



eCOGRA LIMITED
KANSSPELAUTORITEIT
NETHERLANDS ONLINE GAMBLING SYSTEM
CONFORMITY ASSESSMENT REPORT
GAME OR GAMING TECHNOLOGY (INCLUDING RNG)

FOR

ALCHEMYBET LTD

REPORT REFERENCE NUMBER: E233510GRLNLDM

REPORT ISSUE DATE: 27 MARCH 2023

CONFIDENTIAL

**PLEASE NOTE THAT THIS GAME CERTIFICATION
REPORT SUPERSEDES THE PREVIOUSLY
ISSUED REPORT NUMBER: E233396GRLNLDM**

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1. GENERAL INFORMATION

CLIENT NAME:	AlchemyBet Ltd
CLIENT ADDRESS:	Two Valentine Place, London SE1 8QH, United Kingdom
CLIENT CONTACT PERSON:	Alli Archer
CLIENT E-MAIL ADDRESS:	alli@gamingrealms.com
PRODUCT NAME:	Slingo Pirates Treasure
UNIFORM RESOURCE LOCATORS: (WEBSITE ADDRESS)	Not applicable, this report relates to the assessment of a supplier to license holders.
ASSESSMENT BODY FULL NAME:	eCOGRA Limited t/a eCOGRA
ASSESSMENT BODY LEGAL FORM:	Private Company
ASSESSMENT BODY MANAGING ADDRESS:	2nd Floor Berkeley Square House, Berkeley Square, London, W1J 6BD, United Kingdom
ASSESSMENT BODY ACCREDITATIONS HELD:	<p>An Accredited Testing Laboratory No. 4656. ISO/IEC 17025:2017, Issued By The United Kingdom Accreditation Service (Issue: 013, Issue Date: 27 February 2023).</p> <p>An Accredited Inspection Body No. 4656. ISO/IEC 17020:2012, Issued By The United Kingdom Accreditation Service (Issue: 007, Issue Date: 09 August 2021).</p> <p>An Accredited Certification Body No. 4656. ISO/IEC 17021-1:2015, Issued By The United Kingdom Accreditation Service (Issue: 007, Issue Date: 09 August 2021).</p> <p>An Accredited Certification Body no 4656. ISO/IEC 17065:2012, Issued By The United Kingdom Accreditation Service (Issue: 008, Issue Date: 15 December 2022).</p>
ASSESSMENT BODY EXPERIENCE:	20 Years' Testing And Inspection Of Online Gambling Systems; 7 Years' Auditing and Certifying Information Security Management Systems, 8 Years' Experience Of Risk And Vulnerability Analyses.

ASSESSMENT BODY CONTACT PERSON:	Bradley Khoury
ASSESSMENT BODY CONTACT EMAIL:	info@ecogra.org
ASSESSMENT SCOPE:	Game or gaming technology (including RNG)
ASSESSMENT STANDARDS AND CRITERIA:	Netherlands Gambling Authority Online Gambling Assessment Scheme (Version 2.0, 01 October 2022); Netherlands Remote Gambling Decree (January 2021); and Netherlands Remote Gambling Regulation (January 2021).
REPORT TYPE:	Conformity Assessment Report
REPORT REFERENCE NUMBER:	e233510GRLNLDM
REPORT ISSUE DATE:	27 March 2023
DATES OF ASSESSMENT:	07 March 2023 – 27 March 2023
PLACE OF TESTING:	The Assessment Body's Premises with Remote Access to the Pre-Production Environment emulating the Live Environment, where applicable.
ASSESSMENT RESULT:	Compliant
ASSESSMENT BODY REPORT APPROVAL:	

A handwritten signature in black ink, appearing to be "BK" or similar initials, written over a circular scribble.

Bradley Khoury
Chief Technical Officer
eCOGRA

2. GAMING TECHNOLOGY ASSESSMENT WORK – QUALIFICATIONS AND EXPERIENCE

2.1. ASSESSMENT SUPERVISORS

Name:	Tyrone Rajah
Education/Qualification:	Bachelor of Science
Date Obtained:	2014
Number of Years' Experience in Testing and Inspection of Online Gaming Systems:	2 Years

Name:	Temesgen Zewotir
Education/Qualification:	PhD in Statistics
Date Obtained:	28 November 2001
Other Relevant Qualifications:	MSc in Statistics, BSc in Mathematics
Date Obtained:	1991, 1987
Number of Years' Experience in Testing and Inspection of Online Gaming Systems:	From 2016 to date

2.2. TESTING AND INSPECTION ASSESSORS

Name:	Thabang Maganedisa
Position:	Team Lead

Name:	Sumeshan Padayachee; Ethic Hadebe; Collin Zondi; Lungisani Mkhize
Position:	Compliance Tester

Name:	Lungisani Mkhize
Position:	Data Analyst

3. OVERVIEW OF ONLINE GAMING SYSTEM COMPONENTS ASSESSED

3.1. GAME OR GAMING TECHNOLOGY (INCLUDING RNG)

Please note that this is an initial certification conducted over Slingo Pirates Treasure and therefore this game certificate does not supersede any previous certifications.

3.2. GAME OVERVIEW

Game Name	Game ID	Version	Platform	Game Type
Slingo Pirates Treasure	slingo-piratestreasure	1.0.0	HTML5-Desktop; HTML5-Mobile	Slot

Game Description: The aim of Slingo Pirate's Treasure is to complete Slingos (win lines) by matching the numbers on the reel to the numbers in the grid above. Each Slingo completed moves the player up the pay ladder to award prizes. Cash prizes are awarded for 3 or more Slingos and a bonus game of increasing value, starting with the 6th Slingo completed.

Further details regarding the betting characteristics, features and detailed game rules can be found in the game instructions which can be provided upon request.

This certification report highlights our key findings as a result of the evaluation conducted on the following channels:

- Desktop Channel - Windows 11 Pro, Google Chrome Browser, Version 111.0.5563.66 (Official Build) (64-bit)
- Mobile Channel - Samsung A8, Android 11; SM-X205 Build/RP1A.200720.012 Google Chrome Browser Version 103.0.5060.129

3.3. PERCENTAGE RETURN TO PLAYER ('RTP')

Theoretical RTP %	eCOGRA RTP % Recalculation
Base game: 94.17%	Base game: 93.51%
Extra Spins: 93.98%	Extra Spins: 94.14%

The theoretical RTP percentage indicated in the table above is extracted from the game documentation as provided by the supplier. eCOGRA recalculated the RTP percentage by performing additional independent mathematical calculations on the output of simulation game data.

3.4. GAME CRITICAL SOFTWARE COMPONENTS

The following critical software elements formed part of the assessment scope:

Software Element Name	Version Date	Version Number	Digital Signature (SHA#1 Hash)
ChanceEngine.class	N/A	1.5.0	F13C9090CCC0FAA67602EEA89FB44EAAD4A52C1A
SlingoPiratesTreasureEngine.class	N/A	1.5.0	A5C898FBBA9B9DA6861FAFFF2279C38E436BF236
battle-piratestreasure-1-config.yml	N/A	1.5.0	421E2E0F314418997D6F723D45F32A1F9B8A6367
battle-piratestreasure-2-config.yml	N/A	1.5.0	A758CB387AAE10455261A8E06FCA149B77E64548
battle-piratestreasure-3-config.yml	N/A	1.5.0	ED10A13EFE5F84792DA56A0ED9536AD90FBF3072
battle-piratestreasure-4-config.yml	N/A	1.5.0	C79EB6043777E6BFBB600DA523115E9367D87168
battle-piratestreasure-5-config.yml	N/A	1.5.0	76378090A6EB70C77A3D4FB86E19E3C5D5D64C91
battle-piratestreasure-6-config.yml	N/A	1.5.0	5117EDE31518B1906E2CA626959EDF0CE8F1F79F
chance-piratestreasure-diamond-config.yml	N/A	1.5.0	DDE34FA68B50BD1F6593B5CA0B7049E3D209A4D0
chance-piratestreasure-gold-config.yml	N/A	1.5.0	831D849E67563BBAA7A54FC1DF396442CC2E426E
chance-piratestreasure-ruby-config.yml	N/A	1.5.0	B210BA96B44C863DD01C53DCEEFDF07678286B53
slingo-piratestreasure-config.yml	N/A	1.5.0	BBFC70E61291EECB4499EDAAC060800A92EDDB06
slingo-piratestreasure-prices.csv.gz	N/A	1.5.0	1414088711EF75C5364727F2F529DB4467F796F5
SlingoEngine.class	N/A	1.5.0	e8F4516E8A9C1656E8884E3716077E85CCA7738F
BattleEngine.class	N/A	1.5.0	1F8B5F56B822FF67A2E5719B35D509E03295E20B

3.5. RANDOM NUMBER GENERATOR

The RNG utilised in evaluating the game output and games rules has been sufficiently and appropriately tested under a separate RNG testing report. Please refer to RNG report RN-563-GR1-20-02-609 issued by GLI Europe B.V. on 14 July 2021 for further details of testing conducted over RNG.

4. KEY DOCUMENTS REVIEWED

Key Documents Inspected			
File Name	Type	Version Number	Version Date
slingo-piratestreasure_v09-PAR	Parsheet	V09	N/A
rgs-game-info-slingo-pirate_s-treasure	Specification Document	1.0	28/02/2023

5. ASSESSMENT AND EVALUATION METHODS APPLIED

The sections below provide a high-level overview of the assessment and evaluation methods applied.

5.1. GAMES AND GAMING TECHNOLOGY

Game design assessment has included verification of the game mathematics, game artwork, the theoretical RTP and player-facing game rules. Software assessment has included evaluation and verification of the software implementation of the game design aspects tested, with verification procedures conducted over games rules and the actual RTP, using methods of simulation, emulation and manual testing, and verification of the scaling and mapping used to convert raw RNG output to game outcomes.

Game Assessments	
Game Software Assessment	Verification procedures over sufficiency and appropriateness of the client's internal testing conducted over the game under certification.
Documentation Assessment	Evaluation of the supporting game documentation to ensure that it is consistent and supports the game rules and logic present in the game.
Source Code Assessment	Evaluation of the pertinent modules of the game source code for mapping of rules and RNG calling.
Mathematical Assessment	Review of the mapping of the random inputs to game outcomes in accordance with prevailing probabilities and pay tables. Review of the game design and game mathematics that determine the theoretical RTP%. Independent mathematical calculations of RTP% utilising complete, accurate and valid simulated game data output, to verify the theoretical RTP% as per the game mathematics documentation. Game simulation (output) assessment to ensure the game outcomes are randomly generated and the actual RTP is within an acceptable range of the expected RTP.
Playability Assessment	Inspection of game interface including artwork and graphics, and clear and correct presentation of the game rules. Evaluation of game accounting in accordance with game pay tables.
Functionality Assessment	Comprehensive operational and functional client-side tests over the game mechanics to ensure that game pay tables, game rules and help files are correctly implemented in the operation of the game. A check on whether it is possible to place a wager outside of the base game and ordinary course of play, and if this wager directly activates a game feature outside of the ordinary course of play.
Emulation Assessment	Assessment of rare outcomes through emulation to ensure that game pay outs, top prizes and jackpot features (if applicable) operate correctly.

Further documentation assessments, game functionality assessments and game artwork and game rule review assessments were conducted to verify that the game conformed to relevant certifiable requirements.

6. DETAILED ASSESSMENT RESULTS

Testing, inspection procedures and certification auditing procedures were performed against certifiable sections of the following laws and regulations of Kansspelautoriteit, as applicable to the components relevant to the products within scope:

- Netherlands Gambling Authority Remote Gaming System Assessment Scheme (Version 2.0, 01 October 2022);
- Netherlands Remote Gambling Decree (January 2021);
- Netherlands Remote Gambling Regulation (January 2021);

The results of our assessment for conformity with the relevant requirements are detailed below. Different values used in the “Assessment Result” column is described as follows:

- **Compliant:** The components within the assessment scope conform to the assessment standards and criteria.
- **Not Applicable:** The requirement is not applicable for the assessment of conformance. Refer to comments for further information.
- **Out of Scope:** The requirement for the assessment of conformance cannot be evaluated at this stage due to the current scope of testing/inspection or limitation of the test/inspection environment. Refer to comments for further information.
- **Non-Compliant:** Non-compliance with the regulatory requirement has been identified. Refer to comments for further information.
- **Compliant with Observation:** The components within the assessment scope conform to the assessment standards and criteria with certain limitations or an area of moderate risk of potential non-compliance identified. Refer to comments for further information.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
3.2 Payment transactions						
7 - Section number Decree: B4.28.2	ID NL: KS.02.05_2.0	Confirm that the design does not allow the licensee to enable a player to place bets or gamble if the balance (including any gambling credit) on his gambling account does not allow them to do so. Rule out the fact that players can end up with a negative balance on their gambling account.		Functionality Assessment	Compliant	We accessed the games bet options section which can be found on the game interface and selected a bet amount from the bet levels available that is higher than the players account balance. We then attempted to initiate a game round and confirmed that the game does not allow this, the game produces an error message informing the player of insufficient funds and the player is returned to the game interface.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
12 - Section number Decree: B4.31.2	ID NL: KS.02.10_2.0	<p>Confirm that the design ensures that the licensee provides the player with access to the necessary information relating to their gambling account and the changes to the gambling account on each page or screen of the player interface. This information shall in any case include:</p> <ul style="list-style-type: none"> a. the current balance of the gambling account; b. the opening balance of the gambling account at the most recent login; c. the total stake since the most recent login; d. the total profits and the total losses since the most recent login, and e. an overview of all transactions on the gambling account for a period of at least the last 90 days. 		Playability Assessment	Compliant	<p>We participated in multiple game rounds and inspected the game interface, game rules and pay tables. We confirmed that the player's account balance is continuously displayed on all pages related to the game.</p> <p>Requirements are not managed by the game supplier. The scope of assessment is limited to aspects directly managed by the supplier.</p>
3.9 Gambling technology						

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
56 - Regulations number Decree: R3.4.1	ID NL: KS.09.03_2.0	In terms of design, establish that the licence holder only uses names for the games on offer that match the types of game actually being played (poker, roulette, betting, etc.).		Playability Assessment	Compliant	We inspected the game interface, game rules and pay tables, and confirmed that the game name displayed on all pages does not give the player the impression that this is a different game type other than a Slot game. Furthermore, the game rules state this is a slot game.
58 - Regulations number Decree: R3.7	ID NL: KS.09.05_2.0	In terms of design and implementation, establish that devices cannot automatically begin taking part in betting or gambling activities without the input of the player.		Functionality Assessment	Compliant	We accessed the game and confirmed that a game round does not automatically initiate, the player is required to initiate the game round by clicking the 'Spin' button or using the space bar in the keyboard. We further inspected the game interface, game rules and pay tables, and confirmed that there is no auto-play functionality available.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		In terms of design and implementation, establish that a player will not begin participating in a game until they press a real or virtual button to confirm their stake.		Functionality Assessment	Compliant	We participated in multiple game rounds, wagering all possible bet amounts, and confirmed that the player is not forced into betting or gambling activities, the player is required to initiate the game round by clicking the 'Spin' button.
		In terms of design and implementation, confirm that games against the licensee do not include any form of automatic stakes.		Functionality Assessment	Compliant	We accessed the game and inspected the game interface, game rules and pay tables. We confirmed that there is no auto-play functionality available.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		In terms of design and implementation, establish that the so-called auto-play functionality can only be used after the start of a game where another player is played at the same time.		Functionality Assessment	Not Applicable	We inspected the game interface, game rules and paytables, and confirmed that there is no auto-play functionality available in the game. Furthermore, the game under certification is not a multi- player game.
59 - Regulations number Decree: R3.9	ID NL: KS.09.06_2.0	In terms of design, establish that the auto-play function operates in accordance with the rules of the game, as communicated to the player. At the very least, establish that the fairness of the function and the timeliness of choices are addressed.		Functionality Assessment	Not Applicable	We inspected the game interface, game rules and paytables, and confirmed that there is no auto-play functionality available in the game.
		In terms of design, establish that a player cannot simply stake money on something by using the auto-play function, unless this is necessary for the progress of the game, in accordance with rules that must be easily understood by the players (e.g. blinds in a game of poker).		Functionality Assessment	Compliant	We inspected the game interface, game rules and paytables, and confirmed that there is no auto-play functionality available in the game.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
60 - Regulations number Decree: R3.9a	ID NL: KS.09.07_2.0	In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements: a. The player is able to take part in those casino games via a direct video link.		Playability & Functionality Assessment	Not applicable	The game under certification is not a live casino game.
		In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements: b. The direct video link and, where applicable, other communication connections and means of communication: i. have been sufficiently protected against malfunctions; ii. are protected against unlawful access, unauthorised use and manipulation;		Not applicable	Not applicable	The game under certification is not a live casino game.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements: c. the progress of the live casino games and the gambling behaviour of players is analysed and recorded on the basis of video surveillance and video reporting;		Not applicable	Not applicable	The game under certification is not a live casino game.
		In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements: d. the analysis and recording, as referred to under c., shall in any case be aimed at identifying and countering fraud and abuse, as well as risks of gambling addition;		Not applicable	Not applicable	The game under certification is not a live casino game.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		<p>In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements:</p> <p>e. Only personnel who have the requisite qualifications and have received training either internally or externally or have attended a training course shall be used to organise the live casino games.</p>		Not applicable	Not applicable	The game under certification is not a live casino game.

<p>61 - Regulations number Decree: R3.3</p>	<p>ID NL: KS.09.08_2.0</p>	<p>In terms of design and implementation, establish that the gaming system allows the player to finish a game interrupted by malfunctions.</p>	<p>Not applicable</p>	<p>Functionality Assessment</p>	<p>Compliant</p>	<p>We simulated a loss in connection during game play and inspected the game interface. We confirmed that the game produces a message informing the player of no internet connection, and on return to the game we confirmed that the player is presented with a message informing them of the incomplete game. The game continues after a player has pressed the 'ok' button. Furthermore, we refreshed the browser during game play and inspected the game interface on return to the game. We confirmed that the player is presented with a message informing them of the incomplete game. The game continues after a</p>
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Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
						player has pressed the 'ok' button.

		<p>In terms of design and implementation, establish that the gaming system provides information to the player about the status of a game interrupted by malfunctions.</p>		<p>Playability & Functionality Assessment</p>	<p>Compliant</p>	<p>We simulated a loss in connection during game play and inspected the game interface. We confirmed that the game produces a message informing the player of no internet connection, and on return to the game we confirmed that the player is presented with a message informing them of the incomplete game. The account balance is correct and unchanged from the point where the connection was lost. The game round continues after a player has pressed the 'ok' button. Furthermore, we refreshed the browser during game play and inspected the game interface on return to the game. We confirmed that the</p>
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Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
						player is presented with a message informing them of the incomplete game. The account balance is correct and unchanged from the point where the browser was refreshed. The game continues after a player has pressed the 'ok' button.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
62 - Regulations number Decree: R3.5	ID NL: KS.09.09_2.0	In terms of design and implementation, establish that, before play commences, the gaming system provides the player with information about the possible bets and the bets selected by the player.		Playability Assessment	Compliant	We inspected the game interface before play commences and noted the current stake is available on the game interface, the player accesses the Stake options by selecting the stake. All possible stakes levels are available in the Stake options section. Once the player selects their stake, the stakes is clearly displayed at the bottom of the game interface before initiating a game round.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		In terms of design and implementation, establish that the player provides the value of their stake in money (a currency) before the game starts.		Playability Assessment	Compliant	We inspected the game interface before play commences and noted the current stake is available on the game interface and is displayed in Euro's, the player accesses the Stake options by selecting the stake. All possible stakes levels are available in the Stake options section, and it is clear they are in Euro's. Once the player selects their stake, the stakes is clearly displayed on the game interface in Euro's before initiating a game round.
63 - Remote Gambling Decree and Regulations: B4.2.3 and R3.2.1	ID NL: KS.09.10_2.0	In terms of design and implementation, establish that, with the exception of the actual betting and the actual payment of the prizes, the practice games are the same as the gambling activities offered by the licence holder.		Playability & Functionality Assessment & Source Code Assessment	Compliant	The scope of assessment is limited to aspects directly managed by the supplier.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
64 - Regulations number Decree: R3.2a.1	ID NL: KS.09.11_2.0	In terms of design and implementation, establish that the Random Number Generator applied is suitable for the form of gambling for which the Random Number Generator is used.	Not applicable	Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.
65 - Regulations number Decree: R3.2a.3	ID NL: KS.09.12_2.0	In terms of design and implementation, establish that, for casino games, each Random Number Generator, with a data set of at least 1,000,000 outcomes, successfully passes one of the below tests: <ul style="list-style-type: none"> • the DIEHARD Test (Marsaglia); • the NIST (National Institute of Standards and Technology) or TESTU01. For mechanical random number generators such as roulette kettles, it is possible to limit the dataset to a minimum of 1000 times the possible outcomes.		Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.
66 - Regulations number Decree: R3.2.1	ID NL: KS.09.13_2.0	In terms of design and implementation, establish that each Random Number Generator is equipped with a suitable method of seeding and re-seeding so that predictability of results is avoided.		Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
67 - Regulations number Decree: R3.2.1	ID NL: KS.09.14_2.0	In terms of design and implementation, establish that, except for the randomness of other players, the outcome of all chance parts of the gambling activities are based on the Random Number Generator. Exception: when using a randomness mechanism without replacement, the outcome of the random parts can be predictable to a certain extent.		Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.
68 - Regulations number Decree: R3.2.1	ID NL: KS.09.15_2.0	In terms of design and implementation, establish that each outcome of the Random Number Generator, and the result it has led to in the gambling, is recorded.		Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.
69 - Regulations number Decree: R3.2.1	ID NL: KS.09.16_2.0	In terms of design and implementation, establish that the outcome of any game is determined solely by chance and the choice or choices made by the player within the framework of the game.		Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
70 - Regulations number Decree: R3.2.1	ID NL: KS.09.17_2.0	In terms of design and implementation, establish that the gambling can function in the same way, independently of the means used by the players.		Functionality Assessment	Compliant	We inspected the game on HTML5 Desktop and Mobile and confirmed on mobile devices with smaller screens there is no change in the game interface. We confirmed that the functionality is the same on both devices.

<p>71 - Regulations number Decree: R3.2.1</p>	<p>ID NL: KS.09.18_2.0</p>	<p>In terms of design and implementation, establish that the odds of winning or losing expected by the player correspond to the odds generated and presented by the gambling activities.</p>	<p>SlingoPiratesTreasureEngine.class 1.5.0 slingo-piratestreasure-config.yml 1.5.0 chance-piratestreasure-ruby-config.yml 1.5.0 chance-piratestreasure-gold-config.yml 1.5.0 chance-piratestreasure-diamond-config.yml 1.5.0 ChanceEngine.class 1.5.0 battle-piratestreasure-6-config.yml 1.5.0 battle-piratestreasure-5-config.yml 1.5.0 battle-piratestreasure-4-config.yml 1.5.0 battle-piratestreasure-3-config.yml 1.5.0 battle-piratestreasure-2-config.yml 1.5.0 battle-piratestreasure-1-config.yml 1.5.0 slingo-piratestreasure-prices.csv.gz 1.5.0 SlingoEngine.class 1.5.0 BattleEngine.class 1.5.0</p>	<p>Documentation Assessment & Source Code Assessment & Playability Assessment</p>	<p>Compliant</p>	
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Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
			slingo-piratestreasure_v09-PAR			
72 - Regulations number Decree: R3.2.1	ID NL: KS.09.19_2.0	In terms of design and implementation, establish that, where present, the jackpot is linked to a game outcome of the gambling activities and that the jackpot is part of the prize schedule of the gambling activities.		Source Code Assessment & Functionality Assessment & Emulation Assessment	Not Applicable	This game does not contain a progressive jackpot.

<p>73 - Regulations number Decree: R3.3</p>	<p>ID NL: KS.09.20_2.0</p>	<p>In terms of design and implementation, establish that the pay-out rate presented is the theoretical pay-out rate.</p>	<p>SlingoPiratesTreasureEngine.class 1.5.0 slingo-piratestreasure-config.yml 1.5.0 chance-piratestreasure-ruby-config.yml 1.5.0 chance-piratestreasure-gold-config.yml 1.5.0 chance-piratestreasure-diamond-config.yml 1.5.0 ChanceEngine.class 1.5.0 battle-piratestreasure-6-config.yml 1.5.0 battle-piratestreasure-5-config.yml 1.5.0 battle-piratestreasure-4-config.yml 1.5.0 battle-piratestreasure-3-config.yml 1.5.0 battle-piratestreasure-2-config.yml 1.5.0 battle-piratestreasure-1-config.yml 1.5.0 slingo-piratestreasure-prices.csv.gz 1.5.0 SlingoEngine.class 1.5.0 BattleEngine.class 1.5.0</p>	<p>Mathematical Assessment</p>	<p>Compliant</p>	<p>We inspected the math's par sheet and game specification document, and verify that the pay line assessment, payout distribution and theoretical payout rate are in line with the documents provided.</p>
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Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
			slingo-piratest treasure_v09- PARrgs-game-info-slingo- pirate_s-treasure 1.0			
77 - Regulations number Decree: R3.2.2	ID NL: KS.09.24_2.0	In terms of design and implementation, establish that, in player-to-player gambling activities, the participants are registered per game.		Functionality Assessment	Not Applicable	The game under certification is not a multi- player game
78 - Regulations number Decree: R3.3	ID NL: KS.09.25_2.0	In terms of design and implementation, establish that any deviations in a mechanical Random Number Generator are recorded.		Refer to Method stated in RNG report.	Not Applicable	A Mechanical RNG is not used.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
79 - Regulations number Decree: R3.8	ID NL: KS.09.26_2.0	In terms of design and implementation, establish that the gaming system will accept the player's bet and participation only if the outcome of the immediately preceding game is certain.		Functionality Assessment	Compliant	We inspected the game interface during game play and confirmed that once a player initiates a game round, the stake options and 'Spin' button is disabled. A player is unable to change or add to the current stake until the current game round is complete, the account balance is correctly updated, and the game history functionality provides a record that game play is concluded..

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		In terms of design and implementation, establish that the gaming system gives the player sufficient opportunity to influence the further course of the game.		Functionality Assessment	Compliant	We inspected the game interface during game play and confirmed that before a player initiates a game round, a player is given sufficient opportunity to influence the further course of the game, there is no time limit to participate in a game round and a game round will not initiate until a player clicks the 'Spin' button. Include statement on gamble if available.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
80 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.27_2.0	In terms of design and implementation, establish that the rules of the game and the pay-out percentage presented for the game do not change during the game.		Playability & Functionality Assessment	Compliant	We participated in multiple game rounds, including any game features, as well as inspected the game rules and paytables before, during and after game play. We confirmed that there is only one version of game rules and paytables for this game and it does not change and is consistent. Furthermore, we inspected the math's par sheet and XML, and confirmed that the pay-out percentage displayed in the game is consistent with the math's par sheet and XML.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
81 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.28_2.0	In terms of design and implementation, establish that each game is provided with as comprehensive an explanation of the game as possible, including instructions on how to play.		Playability & Functionality Assessment	Compliant	We inspected the game rules/pay tables and confirmed that they cover all aspects of the game and are clearly communicated.
82 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.29_2.0	In terms of design and implementation, establish that the game explanations and related instructions do not give rise to deception or misunderstanding.		Playability & Functionality Assessment	Compliant	We inspected the game rules and pay tables, we participated in multiple game rounds, including any game features and compared this to the game rules and paytables. After our comparison, we confirmed that the game rules are clear and in accordance with the game functionality.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
83 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.30_2.0	In terms of design and implementation, establish that the game explanations and related instructions are displayed using the tool used by the player for the gambling.		Playability Assessment	Compliant	We accessed the game on HTML5 Desktop and Mobile and inspected the game rules and pay tables. The game rules and paytables were accessed via a burger icon found on the game interface and we confirmed that they are available on the same HTML5 Desktop and Mobile device as the actual game.
84 - Remote Gambling Decree and Regulations: B4.34, B4.38 and R3.4	ID NL: KS.09.31_2.0	In terms of design and implementation, establish that the game explanations and accompanying instructions are in any case drawn up in the Dutch language.	rgs-game-info-slingo-pirate_s-treasure 1.0	Playability Assessment	Compliant	We inspected the game interface, game rules, pay tables and game rule documents. We confirmed with the use of a translator tool and image text extractor that all information is displayed in the Dutch.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
85 - Remote Gambling Decree and Regulations: B4.34, B4.38 and R3.4	ID NL: KS.09.32_2.0	In terms of design and implementation, establish that the game explanations and corresponding instructions are set to Dutch by default.	rgs-game-info-slingo-pirate_s-treasure 1.0	Playability Assessment	Compliant	The scope of assessment is limited to aspects directly managed by the supplier.
86 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.33_2.0	In terms of design and implementation, establish that the available game explanations and related instructions are the same in all languages.	rgs-game-info-slingo-pirate_s-treasure 1.0	Playability Assessment	Compliant	We inspected the game interface, game rules, pay tables, Dutch and English and game rule documents. With the use of a translator tool we compared the information and confirmed that all information is the same in all languages.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
87 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.34_2.0	In terms of design and implementation, establish that game explanations and related instructions are available before the player places their bet.		Playability & Functionality Assessment	Compliant	We accessed the game and inspected the game rules and pay tables before initiating a game round. We confirmed that the game rules and paytables are available before a game round is initiated by the player and they remain available throughout game play.
88 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.36_2.0	In terms of design and implementation, establish that game explanations and corresponding instructions are also available during the game.		Playability & Functionality Assessment	Compliant	We participated in multiple game rounds and features and inspected the game rules and pay tables. We confirmed that they are available during game rounds.
89 - Remote Gambling Decree and Regulations:	ID NL: KS.09.37_2.0	In terms of design and implementation, establish that the game explanations and accompanying instructions contain information on the theoretical pay-out rate of the gambling activities.		Playability Assessment	Compliant	We inspected the game rules and pay tables and confirmed that the theoretical pay-out rate is clearly displayed.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
B4.34 and R3.4		In terms of design and implementation, establish that, where applicable, the pay-out percentage is displayed for different game strategies of the player.		Playability Assessment	Not applicable	We inspected the game rules and confirmed that only one RTP payout percentage is displayed. The game being certified is a single player slot game and does not contain elements of skill, the player is able to select their stake from the stake section found by clicking on the stake displayed on the game interface, once a player has selected their stake the stake section is minimized, and the player is able to click the spin button to initiate the game round.