



GIBRALTAR GAMBLING COMMISSIONER – EVALUATION REPORT

FOR

ALCHEMYBET LTD

SLINGO PIRATES TREASURE, HTML5-DESKTOP; HTML5-MOBILE, 1.0.0

CONFIDENTIAL

CERTIFICATE NUMBER: E233505GRLGIBM

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TABLE OF CONTENTS

SECTION 1. GENERAL INFORMATION	4
SECTION 2. INTRODUCTION.....	5
SECTION 3. GAMES DESCRIPTION	6
SECTION 4. SOFTWARE DETAILS	7
SECTION 5. REVIEW FINDINGS	9

SECTION 1. GENERAL INFORMATION

Operator:	N/A
Software Provider:	AlchemyBet Ltd
Product Name:	Slingo Pirates Treasure
Product Type:	Other
eCOGRA Proposal Number:	p21635GRLCGM
Applicable Technical Standards:	Remote Technical and Operating Standards for the Gibraltar Gambling Industry, Gambling Commissioner's Guidelines – v.1.1.0 (the 'RTOS')
Testing Laboratory:	eCOGRA Limited 2/F Berkeley Square House Berkeley Square London W1J 6 BD United Kingdom
Test Engineer:	Sumeshan Padayachee; Tshavhungwa Mukhanu; Ethic Hadebe; Lungisani Mkhize
Supervisor:	Thabang Maganedisa
Request for Report:	07 March 2023
Report Date:	27 March 2023
Report Number:	e233505GRLGIBM

I hereby certify that the slot game Slingo Pirates Treasure complies with the relevant sections of the RTOS, as described in Section 5 of this report.



Pierre Jordaan
Compliance Director
eCOGRA

SECTION 2. INTRODUCTION

eCOGRA has been appointed by AlchemyBet Ltd to review the HTML5-Desktop; HTML5-Mobile, Slingo Pirates Treasure for compliance with the RTOS, and to highlight any exceptions identified during testing.

This report highlights our key findings as a result of the testing performed in a test environment established at AlchemyBet Ltd during the period 07 March 2023 to 27 March 2023

Please note that this game certificate supersedes the certification for the game previously conducted, as follows:

Slingo Pirates Treasure HTML5-Desktop; HTML5-Mobile Previous Certificate Number: e233392GRLGIBM

The update made to the originally certified game encompassed the following changes:

- The slingo-piratestreasure-prices.csv.gz, SlingoEngine.class and BattleEngine.class critical files has been added to the game.

SECTION 3. GAMES DESCRIPTION

Slingo Pirates Treasure, 1.0.0

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.

SECTION 4. SOFTWARE DETAILS

Details of the software tested during this evaluation are as follows:

HTML5-Desktop; HTML5-Mobile – Slingo Pirates Treasure

File Name / Identifier	Version Date	Version Number	SHA 1 hashes
ChanceEngine.class	N/A	1.5.0	F13C9090CCCF0AA67602EEA89FB44EAAD4A52C1A
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	C79EB6043777E6BFB600DA523115E9367D87168
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	B210BA96B44C863DD01C53DCEEFD07678286B53
slingo-piratestreasure-config.yml	N/A	1.5.0	BBFC70E61291EECB4499EDAAC060800A92EDDB06
BattleEngine.class	N/A	1.5.0	1F8B5F56B822FF67A2E5719B35D509E03295E20B
SlingoEngine.class	N/A	1.5.0	e8F4516E8A9C1656E8884E3716077E85CCA7738F
slingo-piratestreasure-prices.csv.gz	N/A	1.5.0	1414088711EF75C5364727F2F529DB4467F796F5

RNG

File Name	Version Date	Binary MD5 Sums/ SHA 1 hashes
RNG.class	1.0.51	11eb3a558bcad225abbc630db5847871 24b872ccac8d36c4d5694cc5d523e8b0e19846b3
SecureRNG.class	1.0.51	2ff576ad343e1910b785fd0d65304c8f c051b2292f000afcc6cc782d581ba6507b83817d
RNG.java	1.0.51	e21b7d1977d0b437f45f5d94415e754c c09cf366a0351e6f346bce00a3a0583bb7ee45d5
SecureRNG.java	1.0.51	8bf70f81bb37c05ab806be8cba712a1e 794cc18d0b853715a0e2e4bbc623007819dd3644

SECTION 5. REVIEW FINDINGS

The key findings of our review of the game for compliance with the relevant sections of the RTOS are as follows:

Technical and Operating Standards	Assessment	Comments
7.1 Game Fairness		
(1) Licence holders should make information available to customers on their website(s) about their testing and quality assurance arrangements in place to assure fairness and randomness in their gaming products, including information about testing/certification by an ATF where applicable and where this can be accessed.	Not applicable	The scope of assessment is limited to aspects directly managed by the supplier.
(2) Licence holders should ensure appropriate systems and resources are deployed to prevent or detect attempts to cheat by customers or other parties. Such measures should be applied on a risk sensitive basis, with analytic programs (e.g. algorithms, exception reports, cluster analysis) deployed to identify long term or systemic cheating as well as short/medium term sporadic efforts.	Not applicable	The scope of assessment is limited to aspects directly managed by the supplier.
(3) Games should be implemented and operate fairly and strictly in accordance with the published rules and prevailing RTP where applicable.	Compliant	
(4) Games designed to give the customer only the perception that speed or skill influences the outcome of a game (e.g. "steering" or "aiming") should make this apparent in the game description.	Not applicable	This is not a game of skill
(5) A licence holder should not implement game designs or features that may reasonably be expected to mislead the customer about the likelihood of particular results occurring. This includes, but is not limited to the following:	Compliant	
(a) Where a game simulates a physical device the theoretical probabilities and visual representation of the device should correspond to the features and actions of the physical device (e.g. roulette wheel).	Not applicable	This game does not simulate any physical objects
(b) Where multiple physical devices are simulated the probabilities of each outcome should be independent of the other simulated devices (e.g. dice games).	Not applicable	This game does not simulate any physical objects
(c) Where the game simulates physical devices that have no memory of previous events, the behaviour of the simulations should reflect the behaviour of the physical devices (e.g. roulette wheel, cards, dice games).	Not applicable	This game does not simulate any physical objects

Technical and Operating Standards	Assessment	Comments
(d) Games should not falsely display near-miss results, that is, the event may not substitute one random losing outcome with a different losing outcome.	Compliant	
(e) Where the event requires a pre-determined layout (for example, hidden prizes on a map), the locations of the winning spots should not change during play, except as provided for in the rules of the game.	Not Applicable	This game does not make use of pre-determined layouts
(f) Where games involve an element of skill, every outcome described in the virtual event rules or artwork should be possible, that is, the customer should have some chance of achieving an advertised outcome regardless of skill.	Not applicable	This is not a game of skill
(g) Where a customer contributes to a jackpot pool, that customer should be eligible to win the jackpot whilst they are playing that game, in accordance with the game and jackpot rules.	Not applicable	This game does not contain a progressive jackpot
(6) If a cap is established on any jackpot, all additional contributions once that cap is reached should be credited to the next jackpot.	Not applicable	This game does not contain a progressive jackpot
(7) If the artwork contains game instructions specifying a maximum win, then it should be possible to win this amount from a single game (including features or other game options).	Compliant	
(8) Casino games should operate at a speed that allows the player to establish the result of each cycle of the game. Players may be permitted to accelerate the speed of a game where they are still able to establish the result of each cycle.	Compliant	
7.2 'Play for Free' Games		
(1) Play for free games for no prize are not gambling but should accurately reflect any 'real-money' version of the game, and should not be used to encourage those under 18 to use licensed gambling facilities.	Not applicable	The game is not a 'Play for Free' offering.
(2) In particular, such games should not be designed to mislead the player about the chances for success by, for example, using mappings that produce different outcomes than the cash game. Licence holders should be able to demonstrate this equivalence to the Gambling Commissioner upon request.	Not applicable	The game is not a 'Play for Free' offering.
(3) Play for Free games for a prize, (ie games providing the opportunity to win a prize of money or monetary worth) do amount to gambling.	Not applicable	The game is not a 'Play for Free' offering.
(4) Pay to Play games for no prize, sometimes referred to as 'social gaming', do not amount to gambling whilst the object or outcome of the game play does not amount to a prize.	Not applicable	The game is not a 'Social Gaming' offering.

Technical and Operating Standards	Assessment	Comments
Where such games reflect any 'real money' games they should not be used to encourage those under 18 to use licensed gambling facilities and should perform consistently with 'real money' games.		
7.3 Compensated or adaptive games		
(1) Games should not be "adaptive" or "compensated", that is, the probability of any particular outcome occurring should be the same every time the game is played, except as provided for in the (fair) rules of the game.	Compliant	The game does not include any adaptive or compensative features.
7.4 No Forced Game Play		
(1) The customer should not be forced to play a game simply by selecting it.	Compliant	The scope of assessment is limited to aspects directly managed by the supplier.
(2) A mechanism should be implemented to prevent repeated gamble instructions, (for example, where a customer repeatedly presses "play" while waiting for a game result) to be executed.	Compliant	
7.5 Auto-play		
(1) The customer should retain control of the gambling where auto-play functionality is provided. The auto-play functionality should:	Not applicable	
(a) Enable the customer to choose the stake and either the number of auto-play gambles or the total amount to be gambled.	Not applicable	
(b) Enable the customer to stop the auto-play regardless of how many auto-play gambles they initially chose or how many remain.	Not applicable	
(c) Not override any of the display requirements (e.g. the result of each gamble should be displayed for a reasonable length of time before the next play.)	Not applicable	
7.6 Game Control		
(1) It should be possible for the licence holder to disable any game or game session.	Not applicable	The scope of assessment is limited to aspects directly managed by the supplier.
(2) The licence holder should be able to provide full audit trails when disabling a game that is currently in play.	Not applicable	The scope of assessment is limited to aspects directly managed by the supplier.
7.7 Incomplete Games		
(1) Where possible, licence holders should provide a mechanism in single player games for an incomplete game to be completed before a customer is able to participate in any other game. Incomplete games may occur as a result of:	Compliant	

Technical and Operating Standards	Assessment	Comments
(a) Loss of communications between the licence holder and end customer device,	Compliant	
(b) Licence holder restart,	Not applicable	The scope of assessment is limited to aspects directly managed by the supplier.
(c) Game disabled by licence holder,	Not applicable	The scope of assessment is limited to aspects directly managed by the supplier.
(d) End customer device restart, and	Compliant	
(e) Abnormal termination of gambling application on end customer device.	Compliant	
(2) Gambles associated with a partially complete game that can be continued should be held by the licence holder and be apparent to the customer.	Not applicable	The scope of assessment is limited to aspects directly managed by the supplier.
(3) The licence holder should ensure customer fairness, to the extent possible, in the event of a communication loss to one or more end customer devices during a multi-customer game.	Not applicable	This is a single-player game
7.8 Game / Website Design		
(1) The functions of all buttons represented on the website and games should be clearly indicated.	Compliant	The scope of assessment is limited to aspects directly managed by the supplier.
(2) Edges of the “hot” area of buttons should be clearly defined in the artwork to prevent clicking near buttons creating a gamble.	Compliant	The scope of assessment is limited to aspects directly managed by the supplier.
7.9 Poker / P2P Games		
(1) In respect of P2P games, in particular poker, licence holders should ensure appropriate collusion pattern analysis and reporting is in place to identify any biases or patterns that indicate collusion, and be able to provide an appropriate level of investigation/intervention. As a minimum the analysis should:	Not applicable	Does not apply to this product offering
(a) Aim to identify those individual players with unusually high/low levels of success, and be satisfied that these outcomes are consistent with fair and predictable playing patterns and do not arise through extraneous or irregular events or actions.	Not applicable	Does not apply to this product offering
(b) Be able to identify players who routinely make decisions contrary to the mathematically-optimal course of action, and yet persist to have success levels greater than expected.	Not applicable	Does not apply to this product offering

Technical and Operating Standards	Assessment	Comments
(c) Review player table placement and aim to identify players who tend to collude or operate inappropriately in team groupings.	Not applicable	Does not apply to this product offering
(d) Be aware of existing and developing trends in player collusion methods and tactics.	Not applicable	Does not apply to this product offering
(5) Under their terms and conditions, poker rooms should make explicit that collusion of any form between players will not be tolerated and may lead to the suspension of funds pending investigation.	Not applicable	Does not apply to this product offering
(6) Operators should not permit the use of robots by customers, and should have procedures in place to monitor the rooms for robots and, where detected, stop their play and conduct a review of the account.	Not applicable	Does not apply to this product offering
7.10. Sports betting and integrity		
(1) Sports betting licence holders should have procedures for identifying suspicious betting transactions and patterns which might identify a threat to the sport's integrity or any form of cheating. Where a threat is identified there should be a procedure for notifying the relevant sporting body in line with applicable data protection requirements, and for informing the Gambling Commissioner.	Not applicable	Does not apply to this product offering
(2) Licence holders should give active consideration to joining properly structured and organized information sharing/alert mechanisms for managing suspicious bets or accounts.	Not applicable	Does not apply to this product offering
(3) Effective risk control mechanisms should be in place for managing events offered, bet sizes and prices, taking into consideration available cash and cash equivalents.	Not applicable	Does not apply to this product offering
(4) The terms and conditions for sports betting (and other betting events) should be 'fit for purpose' in terms of the products offered and the safeguards need to deter or disrupt corrupt betting, breaches of the rules of any sport or competition attracting bets, or any other attempt to cheat, commit fraud, breach terms and conditions or otherwise operate an account in a way that may undermine the integrity of the affected event or the betting on that event.	Not applicable	Does not apply to this product offering
11.1 RNG and Game Randomness		
(1) Licence holders should be able to demonstrate the fairness and randomness of all games to the Gambling Commissioner without any undue delay.	Compliant	Refer to report 20928ABLMJ001 where the RNG has been previously certified.
(2) The output obtained through the use of the RNG shall be proven to:	Compliant	Refer to report 20928ABLMJ001 where the

Technical and Operating Standards	Assessment	Comments
(a) Be statistically independent.		RNG has been previously certified.
(b) Be uniformly distributed over their range.		
(c) Pass various recognised statistical tests intended to demonstrate a) and b) above and the absence of patterns.		
(d) Be unpredictable without knowledge of the algorithm, its implementation, and the current seed value (all of which should be secure).		
(e) Be random and distributed in accordance with the rules and expected probabilities of the game.		
11.2 Mechanical RNGs		
(1) For games that use the laws of physics to generate game outcomes (“mechanical RNGs”) the mechanical RNG should also meet the following guidelines:	Not applicable	Refer to report 20928ABLMJ001 where the RNG has been previously certified.
(a) Components should be constructed of materials that will not degrade before their scheduled replacement lifecycle.		
(b) The properties of the items used should not be altered.		
(c) Customers should not have the ability to interact with, come into physical contact with, or manipulate the mechanics of the game.		
11.3 RNG Failure		
(1) Systems should be in place to quickly identify any failure of the RNG (for example, if a short sequence is repeated, or if the output is a constant flow of the same value).	Compliant	Refer to report 20928ABLMJ001 where the RNG has been previously certified.
(2) In the event of an RNG failure, games that rely upon that RNG should be made unavailable for gambling until the failure is rectified or the RNG replaced.	Compliant	Refer to report 20928ABLMJ001 where the RNG has been previously certified.
12.2 (1) RNG Testing		
Prior to the commercial use of a new RNG in the provision of remote gambling facilities, a licence holder shall furnish the Commissioner with a certificate from an ATF confirming that the output of the RNG passes recognised statistical randomness tests confirming that it meets the randomness requirements in section 11.1(2).	Compliant	Refer to report 20928ABLMJ001 where the RNG has been previously certified.
12.3 (1) Game Engine Testing		
Prior to the commercial use of a new game engine in the provision of remote gambling facilities, a licence holder shall furnish the Commissioner with a certificate from an ATF	Compliant	Refer to report 20928ABLMJ001 where the

Technical and Operating Standards	Assessment	Comments
confirming that the game engine's output (after scaling and mapping) conforms to the randomness requirements in section 11.1(2).		RNG has been previously certified.