

RGS EVALUATION TESTING REPORT

Reference regulation: Maltese Remote Gaming Regulations 2004

(Legal Notice 176 of 2004 of the Lotteries and other Games Act - ACT XXIV OF 2001 and further amendments by Legal Notices 110 of 2006, 270 and 426 of 2007, and 90 of 2011)

February 12th 2015



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Michael Spiteri Bailey CPA MIA

INTRODUCTION

The findings reported in this summary are the results of a broader set of documents and testing activities results archived in Quinel M's facilities. It is intended that the requester declares that:

- Any Hardware provided or described for analysis and testing is configured identically to hardware in commercial use
- Game software/ function provided for the testing and code review is declared by the customer to have the same behavior to the software/code in commercial use
- Functionality made by the software in automatic test mode has a realistic behavior

and that

- all the files and modules,
- the database schemas and all the specific programming resources,
- all the parameters contained into any databases and/or configuration file

that have been subject to the audit process guarantee the same behavior of what is going to be published/deployed according to this audit results.

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The Recipient, by accepting and using this Report, declares to be aware and accept unconditionally all the terms and conditions set forth. If the Applicant and / or the Recipient does not agree on the terms and conditions set forth, Quinel M Ltd reserves the right to cancel the certification provided with this Report, it follows therefore that the Recipient must immediately return all copies to Quinel M Ltd of this Report and cannot use them nor refer to.

Any copy of this test reports and calibration certificates must also include the page number and total number of pages.

Copy of this test report must not be reproduced except in full, without written approval of the laboratory.

A) Audit ID

J14120011

B) Reference regulation

Maltese Remote Gaming Regulations 2004

(Legal Notice 176 of 2004 of the Lotteries and other Games Act - ACT XXIV OF 2001 and further amendments by Legal Notices 110 of 2006, 270 and 426 of 2007, and 90 of 2011)

C) Test methods

J14120011 – I001: QIRT000, QIRT001, QIRT002, ERT001, ERT002

D) Auditor / Test lab (RGR Part VI, 26.b)

Quinel M.ltd

Legal Office:Level 5, Quantum House,75
Abate Rigord Street, Ta'Xbiex, XBX 1120, MALTAOperating Office:Luxe Pavilion, Level 3,
Portomaso Complex, St. Julians - Malta
info@quinel.com.mt**E) Audit subject****Description:**

J14120011 – I001 – BETSOFTGAMING LTD RNG

Receipt date:December 3rd 2015**Inspection date:**From January 28th to February 11th 2015**Certified True Copy**
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F) Requester (RGR Part VI, 26.a)

DIGITUS LTD
77 Strovolos Av.
Strovolos Center Office 204
2018 Strovolos Nicosia (Cyprus).

G) Owner of the system/software (RGR Part VI, 26.a)

RNG.class:
Betsoft Gaming
Suite 19, 4th floor
Valletta Buildings,
South Street,
Valletta - VLT 1103

colt-1.0.3.jar:
Colt library (used by Betsoft Gaming software) is a set of Open Source Libraries for High Performance Scientific and Technical Computing written in Java and developed at CERN.

H) Companies and organizations involved in the process (RGR Part VI, 26.c)

Producer(s) / Integrator(s):
Brandi Ellis – Operations Manager of Betsoft Gaming

Requester:
Michael Spiteri Bailey CPA (Evolve consultancy) – consultant for DIGITUS LTD

Licensee/Operator:
-


I) Individuals involved in the process (RGR Part VI, 26.d)

On the Producer(s) / Integrator(s) side:
Brandi Ellis – Operations Manager of Betsoft Gaming

On the Requester side:
-

On the Licensee/Operator side:
-

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J) Processes, rules and parameters of the games (RGR Part VI, 26.e)

N.A.

K) Protocols and specifications of the gaming system (RGR Part VI, 26.f)

N.A.

L) Security of the system (RGR Part VI, 26.g)

N.A.

M) Critical modules (RGR Part VI, 26.h)

J14120011 – I001:

Modules:
 RNG.class (sha1: 0968f400876ba6d4e41cdf99b35e5826b98ab492)
 colt-1.0.3.jar (sha1: 607f4f891c2707aeeb77fe4d1916945279f31b82)

N) Evaluation performed

The test evaluation, required by **Digitus Ltd.**, was completed against the following requirements:
 - Part VI, 25, 26
 - Third Schedule (Regulation 25)

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O) Testing activities applied

Internal procedure followed:
 Rif. "IO 02-02 TEST METHODS rev.2.doc"

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Tests were performed against the following files :

FILE NAME	SHA1	Functionality
RNG.class	0968f400876ba6d4e41cdf99b35e5826b98ab492	Code and binaries
colt-1.0.3.jar	607f4f891c2707aeeb77fe4d1916945279f31b82	Code and binaries

P) Additional information (RGR Part VI, 26.i)

The RNG subject to testing (test item J14120011 – I001) was tested independently without any game connected: no integrations between RNG and games were tested.

Colt "colt-1.0.3.jar" is a set of Open Source Libraries for High Performance Scientific and Technical Computing written in Java and developed at CERN.

Q) Setup and application/system architecture (RGR Part VI, 26.j)

N.A.

R) PRODUCT TESTED

The tests were performed against the following files:

FILE NAME	SHA1	Functionality
RNG.class	0968f400876ba6d4e41cdf99b35e5826b98ab492	Code and binaries
colt-1.0.3.jar	607f4f891c2707aeeb77fe4d1916945279f31b82	Code and binaries

S) CERTIFICATIONDate: February 12th 2015
Requester: DIGITUS LTD.

Total Number of Pages: 11

QUINEL M LTD certifies that the Betsoft RNG examined complies with the Remote Gaming Regulation of Malta (*Legal Notice 176 of 2004 of the Lotteries and other Games Act - ACT XXIV OF 2001 and further amendments by Legal Notices 110 of 2006, 270 and 426 of 2007, and 90 of 2011*).

Refer to the Annex report for the full list of requirement satisfied.

T) CONDITIONS

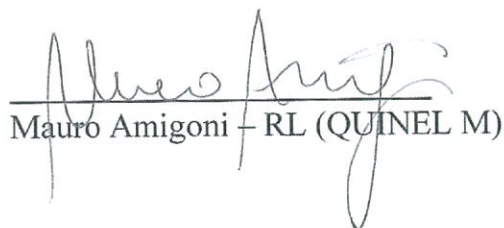
1. The RNG subject to testing (test item J14120011 – I001) was tested independently without any game connected: no integrations between RNG and games were tested.

U) CONCLUSIONS

QUINEL M LTD certifies that the Betsoft RNG tested complies with the Technical Standards requested

Date: February 12th 2015

Signed:



Mauro Amigoni – RL (QUINEL M)

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ANNEX REPORT

DEFINITIONS
“ the Act ” means the Lotteries and Other Games Act, 2001
“ appropriate resources ” means financial resources which are, in the Authority’s sole discretion, adequate to ensure the financial viability of operations of a remote gaming office, and which are available from a source that is not tainted with illegality
“ appropriate services ” means the services of persons who have appropriate experience to ensure the proper and successful conduct of a remote gaming operation and, or a remote betting office
“ approved control system ” means a control system approved by the Authority, and shall include an approved control system changed or modified with the approval of the Authority
“ authorised game ” means remote gaming that a licensee is permitted to conduct under these regulation
“ the Authority ” means the Lotteries and Gaming Authority
“ betting market ” means a betting event with a well defined termination point and decidable outcome
“ control system ” means a system of internal controls, and administrative and accounting procedures for the conduct of a remote gaming office which is set up and maintained in Malta
“ electronic means ” means all electronic data transfer, whether by telephony, facsimile, computer or any other means of distance communications as approved by the Authority
“ game ” has the same meaning assigned to it by the Act
“ gaming ” means an agreement, scheme, or arrangement between two or more parties to play together at a game of chance in which a prize or reward consisting of money or some other item of value, worth, advantage, or opportunity is offered or can be won and become the property of the winner under defined conditions established for the purpose of the game
“ gaming records ” means all records directly or indirectly related to remote gaming and to bets provided by a licensee and to player account information, wagers placed and to the outcomes of games played
“ gaming system ” means a computer system or systems of computers by means of which remote gaming is conducted, and shall include all its associated components, its operating systems and applications software
“ inspector ” has the same meaning assigned to it by article 17 of the Act
“ key official ” means a person nominated by the licensee who is a director of the licensee and resident in Malta
“ licensee ” means a person to whom the Authority has issued a remote gaming licence
“ means of distance communications ” has the same meaning assigned to it by the Act but shall not include press advertising with an order form or catalogue and phone-ins during radio and television programmes
“ the Minister ” means the Minister responsible for finance
“ player ” means any person who is over 18 years of age and who takes part in remote gaming
“ player’s account ” means a record kept by the licence holder, which record shall at all times be accessible to the player, which shows the player’s credit against such licence holder, taking into account all wagers placed and all prizes won by such player and any other debits or credits as may be permitted by these regulations or approved by the Authority
“ pool betting ” means betting made on terms where all or part of the winnings shall be determined

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by reference to the aggregate of stakes paid or agreed to be paid by the person betting, and which shall be divided among the winners
“ remote betting ” means the negotiation or receiving of any bet by a means of distance communications
“ remote gaming ” means any form of gaming by means of distance communications
“ remote gaming equipment ” means a machine or other device whether electronic, electrical or mechanical, computer software, or any other mechanism, device or item, used or suitable for use, in the operation of an authorised game and which is situated in Malta
“ remote gaming licence ” means the licence granted to a licensee by the Authority to conduct remote gaming
“ remote gaming related activities ” means any activity or business that the Authority considers reasonably related to the operation of remote gaming, or any business that offers goods or services to persons who participate in licensed remote gaming
“ qualifying shareholding ” has the same meaning assigned to it by the Act
“ stake ” has the same meaning assigned to it by the Act.

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Part VI Gaming System		
25.	<i>An applicant for a licence, or a licensee shall in respect of a new gaming system, and before any such system becomes operational, provide adequate certification that may be required by the Authority. Provided that the certification must show that gaming system has been found within the previous six months to comply with each and all the technical specifications laid down in the Third Schedule to these Regulations</i>	I001: PASS
26.	The certification submitted to the Authority for approval must, where the system is based on computer software, include the following information	
(a)	the name of the owner of the software	I001: PASS
(b)	the name of the organisation which did the testing required by the Authority	I001: PASS
(c)	all companies and organisations involved in the process and their credentials	I001: PASS
(d)	all individuals involved in the process and their professional credentials	I001: PASS
(e)	the processes, rules and parameters of the games	I001: PASS
(f)	the server protocols, communication protocols and other specifications which are part of the gaming system architecture	I001: N.A.
(g)	information about the security of the system	I001: PASS*
(h)	which modules affect processes, rules and parameters of the game if the source-code is changed	I001: PASS
(i)	any other information that is of material importance to the specific software	I001: PASS
(j)	a detailed description of the setup and functionality of the application architecture and system architecture	I001: PASS

(*) RNG instance will run on licensee system.

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Third Schedule		
Technical requirement for gaming system		
1.	The gaming system must-	
(a)	faithfully follow the game rules published by the operator and	I001: N.A.
(b)	provide over time no more than the expected house advantage to the operator	I001: N.A.
2.	Both the gaming and financial transactions must be congruent and secure.	I001: N.A.
3.	The gaming system must satisfy the following criteria for randomness, following Schneier-	
	(a) the data must be randomly generated, passing appropriate statistical tests of randomness.	I001: PASS
	(b) the data must be unpredictable, i.e. it must be computationally infeasible to predict what the next number will be, given complete knowledge of the algorithm or hardware generating the sequence, and all previously generated numbers.	I001: PASS
	(c) the series cannot be reliably reproduced, i.e. if the sequence generator is activated again with the same input (as exactly as is reasonably possible) it will produce two completely unrelated random sequences.	I001: PASS
4.	The outcome of any game event, and the return to the player, must be independent of the CPU, memory, disk or other components used in the playing device used by the player	I001: N.A.
5.	The game or any game event outcome must not be affected by the effective bandwidth, link utilisation, bit error rate or other characteristic of the communication channel between the gaming system and the playing device used by the player.	I001: N.A.
6.	The gaming system must be able to display for each game the following information on the current page or on a page directly accessible from the current page via a hyperlink-	
	(a) the name of the game	I001: N.A.
	(b) restrictions on play	I001: N.A.
	(c) instructions on how to play, including a pay-table for all prizes and special features	I001: N.A.
	(d) the player's current account balance	I001: N.A.
	(e) unit and total bets	I001: N.A.
	(f) the rules of the game	I001: N.A.
7.	All financial reports produced by the gaming system must be congruent with gaming transaction reports and conversely	I001: N.A.
	provided that all such reports shall be readily and freely available to the Authority	I001: N.A.
8.	The gaming system must-	
	(a) be capable of producing monthly auditable and aggregate financial statements of gaming transactions, and	I001: N.A.
	(b) calculate accurately all taxation and other monies due to the Authority	I001: N.A.

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9.	The gaming system must maintain information about all games played, including	
(a)	the identity of the player	I001: N.A.
(b)	the time the game began as recorded on the games server	I001: N.A.
(c)	the balance on the player's account at the start of the game	I001: N.A.
(d)	the stakes placed in the game (time stamped by the games server)	I001: N.A.
(e)	the game status (in progress, complete, etc)	I001: N.A.
(f)	the result of the game (time stamped by the games server)	I001: N.A.
(g)	the time the game ended as recorded by the games server	I001: N.A.
(h)	the amount won or lost by the player and	I001: N.A.
(i)	the balance on the player's account at the end of the game	I001: N.A.
10.	The gaming system must maintain information about significant events as follows-	
	(a) large wins	I001: N.A.
	(b) transfers of funds in excess of such amount as the Authority may from time to time direct by notice in writing to the operator	I001: N.A.
	(c) changes made by the operator to game parameters	I001: N.A.
11. Any variations to any of the requirements specified in this Schedule shall be submitted to the Authority for its approval by notice in writing.		

**END
OF
DOCUMENT**

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