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Evaluation Report for SubTech Ltd. Multiple Products (Rolling Report)

Manufacturer:	SubTech Ltd.
ATF Report Number:	SPR.PANDA-OL.1004.01.01
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BMM Spain Testlabs, s.l.u.

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EVALUATION REPORT

Client name & Address:	SubTech Ltd. Abacus Business Centre, Level 1, Birkirkara Bypass, Dun Karm Street Birkirkara BKR 9037 Malta
Client Reference Number:	Submission request letter dated: 28 th October 2020
Testing dates:	Start date: 02 nd November 2020 End date: 08 th September 2021
Product / Game Description:	Multiple products (described in the section 2.3)
Test Category:	Category 0
Jurisdictions Recommended:	Republic Srpska
Technical Standard used for Evaluation:	<ul style="list-style-type: none"> ▪ Zakon o igrama na sreću (Službeni glasnik Republike Srpske broj: 22-2019 od 18.03.2019 godine) izmijenjen amandmanom 131/20 - The Law on Games of Chance (Official Gazette of Republika Srpska, No. 22-2019 of 18 March 2019), As amended by the Amendment 131/20 ▪ Pravilnik o priređivanju internet igara na sreću (Službeni glasnik Republike Srpske broj:45-2019 od 31.05.2019 godine), izmijenjen amandmanom 64/19, 104/19 - Ordinance on the organizing Online Games of Chance (Official Gazette of Republika Srpska, No. 45-2019 of 31 May 2019), as amended by the Amendments 64/19 and 104/19.
Location where test was performed:	BMM Spain Testlabs, s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés - Barcelona (España)
Location where report was issued:	BMM Spain Testlabs, s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés - Barcelona (España)
Conclusion:	Pass
BMM Reference Number:	PANDA-OL.1003
Method/Procedures used:	EURSAM-SPA-MO-04 V5.6
Consultant(s):	Sergio Mouriz, David Pérez, David Recuenco, Albert, Purull, Irene Sánchez, Marc Gonzalez, Adria Brau, Enric Ferrer, David Correa, Dídac Dorca

1. SCOPE OF EVALUATION

SubTech Ltd. requested BMM Spain Testlabs s.l.u. to evaluate the products listed in section 2 for operation in the relevant below Republika Srpska market:

- Zakon o igrama na sreću (Službeni glasnik Republike Srpske broj: 22-2019 od 18.03.2019 godine - The Law on Games of Chance (Official Gazette of Republika Srpska, No. 22-2019 of 18 March 2019),
- Pravilnik o priređivanju internet igara na sreću (Službeni glasnik Republike Srpske broj:45-2019 od 31.05.2019 godine) - Ordinance on the organizing Online Games of Chance (Official Gazette of Republika Srpska, No. 45-2019 of 31 May 2019), as amended by the Amendments 64/19 and 104/19.

2. PRODUCT CHARACTERISTICS (PRODUCT UNDER TEST)

2.1. Platform Description

N/A. Platform is out of scope for this evaluation.

2.2. Schematic of the Online System

N/A, only game evaluation.

2.3. Game Description

GAME NAME	GAME VERSION	CHANNELS							APPROVAL DATE
		DESKTOP	FLASH	HTML5 DESKTOP	HTML5 MOBILE	NATIVE IOS	NATIVE ANDROID	MINI VERSION	
4 Horsemen II	1.0.1	-	-	X	X	-	-	-	1 st October 2021
Demi Gods II	2.0.5	-	-	X	X	-	-	-	1 st October 2021
Demi Gods III	1.2.0	-	-	X	X	-	-	-	1 st October 2021
Egyptian Rebirth II	2.1.0	-	-	X	X	-	-	-	1 st October 2021
Majestic King	1.3.3	-	-	X	X	-	-	-	1 st October 2021
Penny Fruits Xtreme	3.1.0	-	-	X	X	-	-	-	1 st October 2021

2.3.1. 4 HORSEMEN II

4 Horsemen II is a 20 lines video slot featuring Free Spins, Mystery symbols, Colossus Symbols, Bonus Game, Gamble Feature, Nudge Feature and Wilds. All symbols pay from left to right and right to left.

Wild Symbol

Wild symbol counts as any symbol except free spins and bonus. Any 5 Wild Symbols on a winning line will pay Ber per Linex1000. During free spins, a colossus wild symbol might appear on reels 2-4.

Colossus Symbol

All symbols may appear as a Colossus symbol(3x3) in the middle of the slot (on reels 2-4), Wild colossus symbols can appear only during free spins

Mystery Symbol

After the reels have stopped, if there are mystery symbols on the slot, they will uncover and reveal 1 random mystery symbol except bonus, wild and free spins symbols.

Free Spins

Only appears as a colossus symbol on reels 2-4.

During base game when this symbol lands fully(3x3) it will award the player with free spins.

During free spins reels 2-4 will contain only Colossus symbols.

Bonus

Only appears as a colossus symbol on reels 2-4.

During base game when this symbol lands fully(3x3) it will award the player with a bonus game.

The player can spin the wheel to win the indicated multiplier.

Nudge Feature

If 2/3 of a bonus or a free spins symbol landed in the middle of the slot (on reels 2-4), a Nudge feature might occur. The Nudge feature will make the symbol fill the middle of the slot.

During base game only.

Gamble Feature

After triggering the free spins feature, the gamble screen is displayed.

This feature gives a chance to win up to 50 free spins.

The player can choose to collect the current amount of free spins or risk a portion of them by clicking the gamble button to try and win more free spins.

A successful gamble will award the player with the indicated amount of free spins for this round.

Afterwards, the player can choose to gamble again or to collect the amount gathered so far.

In case the player reaches 50 free spins, the player will not be able to gamble again.

In case of an unsuccessful gamble, the player will get the amount of free spins indicated on the losing coin, and the player will not be able to gamble again.

2.3.2. DEMI GODS II

Demi Gods II is a 5x3 reel 50 lines video slot featuring 4 types of Free Spins, including Expanding Wilds, Extra Wilds and Shifting Wilds.

Wild Symbol

The Wild symbol can substitute for any symbol except the Free Spins symbol. Any 5 Wild Symbols on a winning line will pay Bet per Line x150.

Win Multiplier

While the reels are spinning, a win multiplier may appear. Any winning combination in this round will be multiplied by x2 or x3. This feature is only present during the base game.

Free Spins Journey

The Free Spins feature will trigger if there are 3 or more scattered Free Spins symbols present on the reels. Each time the player receives free spins they will get the next consecutive free spin feature. This feature is only present during the base game.

Moving Reels Re-Spin

During this free spin's mode, after each winning combination the game will trigger a free re-spin where all reels move 1 reel to the right and a new reel on the far left will be revealed.

Re-spin may re-trigger.

Moving Wild

During this free spin's mode, starting from the far-left reel, each spin a Stacked Wild symbol will move one reel to the right.

Guaranteed Wins

During this free spin mode, each time a spin will result in a loss, a re-spin will trigger which guarantees that every spin will result in a win.

Re-spin may be retriggered.

Expanding Wilds

During this free spin's mode, when a wild land it will expand to fill the entire reel.

Any 5 wild symbols on a winning line will pay bet per line x150.

Extra Wilds

During this free spin's mode, while the reels are spinning, 3-6 wild symbols will appear on the reels and magnify the chance of winning.

2.3.3. DEMI GODS III

Demi Gods III is a 5-reel, 4 row slot game with 50 paylines where all symbols pay from the leftmost to rightmost reel. The game contains a Wild symbol which can replace any symbol except the Scatter. If the Scatter bonus symbol appears a minimum of 3 times in the same spin, it triggers one of nine free spin features. A Win multiplier of x2 or x3 (at random) can appear on any spin.

Niflheim: Winning Symbols Respin

During this feature, any new winning combinations will trigger a respin. All winning combinations will stay in place and the non-winning symbols will be replaced by new symbols in the respin. New symbols that complete or add to a winning bet line will stay in place and the game will respin again. Respinning continues until no newer winning combinations may occur. The game will pay only for the last respin.

Muspelheim: Stacked Wild Respin

Each time a stacked wild symbol lands fully on the reel, a respin will be triggered. Respins may be retriggered. Fully stacked wild symbols can appear only on reels 1 to 4.

Helheim: Guaranteed Wins Feature

Each time a spin results in a loss, a respin will be triggered, guaranteeing that every spin will result in a winning combination. Respins may be retriggered.

Nidavellir: Extra Wild Feature

While the reels are spinning, 3 to 5 wild symbols will appear on the grid and increase the chances of obtaining winning combinations.

Alfheim: Sticky Wild Feature

While the reels are spinning, a sticky wild symbol may appear. Sticky wild symbols will stay on the reels until the end of the free spins round.

Vanaheim: Shifting Reels Feature

After each winning combo, the game will trigger a respin where all reels move 1 row down, having a new row on top revealed. Respins may be retriggered.

2.3.4. EGYPTIAN REBIRTH II

Egyptian Rebirth II is a 5x3 reel 50 lines video slot featuring Stacked Wild free spins, Countdown Wilds, Mystery symbols and Bonus Game.

Wild Symbol

The Wild Symbol can substitute for any symbol except free spins and the Bonus. Any 5 Wild Symbols on a winning line will pay Bet per Line x1000.

Mystery Symbol

After the reels have stopped, if there are Mystery symbols present, they will uncover and reveal 1 random symbol. Any symbol can be revealed except the Bonus, Wild or Free Spins symbols.

Free Spins

The Free Spins feature is triggered if there are 3 or more scattered free spins symbols on the reels.

During free spins only, the wild symbol will expand on one of the reels and will remain there until the end of the free spins feature.

When free spins mode is triggered, the player can choose 1 out of 5 options. For each option, the stacked wild will be located on a different reel for the entire Free Spins game, and the amount of Free Spins will change accordingly.

Countdown Wild

After the reels have stopped, if there are any Countdown Wild symbols on the slot, the game will enter a re-spin mode. During this mode, the Countdown Wild will remain for the next re-spin and its count will go down by 1.

Once there are no Countdown Wilds with a count bigger or equal to 1 on the slot, the re-spin mode will end.

During the base game Countdown Wilds can appear only on reels 1, 3 and 5. This feature is only present during the base game and re-spin modes.

Bonus Game

3 or more scattered bonus symbols will trigger the bonus game feature.

During bonus game, the player will be presented with a 3-level Wheel of Fortune and will have 3 attempts to spin the wheel to win prizes such as multipliers, extra spins or level ups.

If they receive a level up, the player will move to an inner circle of the bonus wheel, where the prizes are higher. Levelling up will also award the player with an extra spin.

Once the player has completed all 3 spins, they will be awarded with the sum of wins that they have collected.

2.3.5. MAJESTIC KING

Majestic King is a 5x3 reel 25 lines video slot featuring 4 types of Free Spins, including Bonus Game, Extra Stacked Wilds Feature, Double Symbols Feature.

Wild Symbol

The Wild Symbol can substitute for any symbol except free spins and the Bonus. Any 5 Wild Symbols on a winning line will pay Bet per Line x200.

Extra Wilds

While the reels are spinning, wild symbols might appear on the reels and increase the chance of winning.

Only Double Symbols

While the reels are spinning, The Only Double Symbols might appear, and cause all symbols to appear in their double symbols form.

Bonus Game

The Bonus Game is triggered when there are 3 or more scattered Bonus symbols on the reels. The game will start with 3 spins. The player must fill the meter by collecting scattered winning symbols. This feature is only present during the base game.

Free Spins

Free Spins is triggered when there are 3 or more scattered Free Spins symbols on the reels.

The player must spin the wheel to win the maximum amount of free spins. Symbols will remain doubled throughout the duration of the free spins game. This feature is only present during the base game.

2.3.6. PENNY FRUITS XTREME

Penny Fruits Xtreme is a 5x4 reel 10-100 lines video slot, where all symbols pay left to right, starting from the leftmost reel. Only the highest win on each winning line is paid. Wins are multiplied by bet. The amount of paylines ranges between 10-100 and is set by user before betting/a wager is placed.

Wild Symbol

Wild Symbol counts as any symbol except Free Spins. Any 5 wild symbols on a winning line will pay bet per line x2000.

Scatter Symbol

3 or more scattered symbols will pay on any position.

2.4. MATHEMATICAL EVALUATION

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM	
4 Horsemen II	1	95.98%	95.98%	96.01%	96.01%	96.01%
4 Horsemen II	Buy-in	95.67%	95.67%	95.69%	95.69%	95.69%

Notes: Differences due to simulations.

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM	
Demi Gods II	1	96.29%	96.29%	96.29%	96.29%	96.29%
	Buy-in	96.21%	96.21%	96.23%	96.23%	95.21%

Notes: Differences due to simulations.

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM	
Demi Gods III	95	95.73%	95.73%	95.74%	95.74%	95.74%
	Bought Feature	94.68%	94.68%	94.70%	94.70%	94.68%

Notes: Differences due to simulations

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP	% RTP	% RTP	% RTP	
		MINIMUM	MAXIMUM	MINIMUM	MAXIMUM	
Egyptian Rebirth II	1	96.01%	96.31%	95.92%	96.19%	96.01% - 96.31%
	Bought Feat	93.77%	95.93%	93.65%	95.88%	93.77% - 95.93%

Notes: Differences due to simulations.

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP	% RTP	% RTP	% RTP	
		MINIMUM	MAXIMUM	MINIMUM	MAXIMUM	
Majestic King	1	Variation 1	96.31%	96.31%	96.36%	96.36%
	Bought Feat	Buy feature	95.23%	95.23%	95.23%	95.23%

Notes: Differences due to simulations.

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP	% RTP	% RTP	% RTP	
		MINIMUM	MAXIMUM	MINIMUM	MAXIMUM	
Penny Fruits Xtreme	1	95.72%	95.72%	95.72%	95.72%	95.72%

JACKPOT/S NAME	BMM CALCULATED RTP		CLIENT CALCULATED RTP		HIT RATE	BASE (START) VALUE	BET % CONTRIBUTION/S
	% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM			
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

N/A, none of the games have a jackpot feature

2.5. EVALUATED SOFTWARE

Product: See Section 2.2					
File Name	Server Version	Location	Function	Digital Signature Type	Digital Signature
RGS.Base.dll	1.0.0.0	Game server	Binary File	SHA-1	314C4327FED1C5FCFD200984B2A03712616DEEED
RGS.CertifiedConfigurations.dll	1.0.0.0	Game server	Binary File	SHA-1	859569E0A75AD7F409E2A855789E62D8358CE538
RGS.CertifiedLogic.dll	1.0.0.0	Game server	Binary File	SHA-1	139AADD0D1BE08A56068AEB106CB3080EE09A903
RGS.Helpers.dll	1.0.0.0	Game server	Binary File	SHA-1	8A7B1BBFE34A21CFA2377C5DF445BDC63D9A9DBB
RGS.Models.dll	1.0.0.0	Game server	Binary File	SHA-1	FD6D5D211B0781290B2665E1250419AB92164D3C
RNGCryptoRandom.dll	1.0.0.0	Game server	Binary File	SHA-1	036B2B8A73B3BA4DFCFEE43761D8CBD4C54A4770

3. BMM EVALUATION PERFORMED.

BMM Spain Testlabs s.l.u. has tested the SubTech Ltd. products specified in Section 2.3, against the relevant requirements of the Republic Srpska online market:

Regulatory Reference	Regulation applied in Republika Srpska	Results of the Test		
		Pass	Fail	Observations
	Text of the Regulation			
	1. System software and hardware			
LGC 24.1	Lottery ("The Lottery of Rep. Srpska") and other organizers of games of chance are obliged, for the purpose of control, to have the appropriate computer system that ensures the storage of data on all elements of organizing of games of chance and which is approved by Ministry.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 24.2	The manufacturer of the computer system referred to in paragraph 1 of this Article cannot be the organizer of games of chance in the Republic.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 90.1	Organizer of the Online games of chance is requested to have a website, which must show the following information: 1) Business name of the organizer of online games of chance,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Regulatory Reference	Regulation applied in Republika Srpska	Results of the Test		
		Pass	Fail	Observations
LGC 90.2	2) Registered seat of the organizer,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 90.3	3) Number of license for organization of online games of chance and issue date,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 90.4	4) The warning that games of chance cause addiction, stress, influence health, as well as possibility of loss of significant funds,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 90.5	5) Links to web sites of organizations which are specialized for assistance to players that have addiction problems,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 90.6	6) Links to legal texts and procedures for online games of chance,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 90.7	7) Links to the balance sheet and business operations for the last year,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 90.8	8) Rules of the games.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
2. Registration and Account:				
LGC 13.1	The organizers of the games of chance are required to comply with the international standards of responsible gaming (English term “responsible gaming”) for the protection of players from harmful consequences of playing and to ensure compliance with the regulations that govern the prevention of money laundering and financing of terrorism.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 87.3	All the data that refer to the online games of chance must be located on the territory of the Republic and must be available on-line to the Ministry.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 87.4.1	The organizer of online games of chance provides Ministry with continuous access to the following data: 1) Username of registered players with virtual player account,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Regulatory Reference	Regulation applied in Republika Srpska	Results of the Test		
		Pass	Fail	Observations
LGC 87.4.2	2) Number of virtual account of players (a special player's account through which he participates in online games of chance),	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 87.4.3	3) Account balance of virtual account of players,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 87.4.4	4) Current balance of total available funds of the players on virtual account,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 87.4.5	5) All payments from the virtual account of players.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.2	Players in online games of chance are required to register for the games through internet page of the organizer referred to in Article 94 of this Law by filling in the registration application.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.3	During the registration, the organizer awards to the player a single account number which is unchangeable and through which all transactions are carried out within the system of online games of chance as well as records of transactions of every player individually.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.4.1	Registration application contains at least the following information: 1) Identity of the player, i.e.name, surname, address of residence and date of birth,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.4.2	2) Selected username of the player,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.4.3	3) Valid e-mail address of the player,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.4.4	4) Selected password,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.4.5	5) Selection of secret personal question with the answer for confirmation of authenticity of the player during every payout,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.4.6	6) Proof that the player is informed about rules before sending the request for registration.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Regulatory Reference	Regulation applied in Republika Srpska	Results of the Test		
		Pass	Fail	Observations
LGC 91.5	Online games provider must prohibit participation in the game to particular player if not regularly registered for participation in the game.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.6	Online games organizer must ensure safe and anonymous on-line list of all participants in the game.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.7	Each player can be registered only with one account at organizer of online games of chance i.e. e-mail address may be valid only once.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.9	The organizer is obligated to enable every player entire insight into movements on its account in every moment.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 91.10	The organizer is obligated to provide internet domain for access to online games of chance.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 6.2	The report shall contain a graphic schematic of the functioning of the online system and shall state all the games in the organiser's online system.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.1	The organizer's software shall be designed to: 1) Ensure the recording and storing of information about players obtained through the registration app;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.2	2) Send an electronic registration confirmation with an activation code to the players, after their registration;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.3	3) Block the virtual accounts of players as a system of control of transferring money to players;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.4	4) Ensure that certain games of chance are conducted and implemented under the rules of each game;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Ord, Article 7.1.5.1	5) Depending on the features of a game, enable that the outcome of an approved game depends solely on chance or on an uncertain event in the game, and to provide accuracy (synchronisation)	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Regulatory Reference	Regulation applied in Republika Srpska	Results of the Test		
		Pass	Fail	Observations
	of the system time (date and hour) with UTC (Coordinated Universal Time) time, thereby providing: 1. Monitoring of all events by time,			
Ord, Article 7.1.5.2	2. Referential reporting clock,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.5.3	3. Monitoring all transactions by time,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.5.4	4. Use of several systems for measuring time must be synchronised;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.6	Meet the requirements for the security of confidential data, and prevent any effect on the course of the selected online game of chance;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.7.1	Enable recording and keeping of the data and information on played games, including: 1. Start time of the selected game,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.7.2	2. Balance of the player's account when the game started,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.7.3	3. Payments in selected games,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.7.4	4. Status of the selected game (started, finished, etc.),	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.7.5	5. The result of the game,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.7.6	6. Finish time of the selected game,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.7.7	7. Amount of the possible and achieved winnings,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.7.8	8. Balance of the player's virtual account when the selected game finished;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.8	Enable recording and keeping of deposits and payments (time, date, manner, and amount);	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Regulatory Reference	Regulation applied in Republika Srpska	Results of the Test		
		Pass	Fail	Observations
Ord, Article 7.1.9	Enable recording and keeping of information on played games (time and date, type of game, amount, increase or decrease on the account);	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.10.1	Enable a control system, i.e. not allow any change of any data on the player's account, money transactions, reporting or unsupervised events, or in cases of changes to the data mentioned, to document the following information: 1. Information being changed,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.10.2	2. The value of data prior to change,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.10.3	3. the value of data after the change,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.10.4	4. time and date of the change,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.10.5	5. Identify who made the change;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.12	Automatically deny underage persons their registration requests to play online games of chance;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.1.13	Prevent players from transferring money from their virtual account to the virtual account of another person.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 7.2	The organiser's online system software, whose game is based on the random number generator, must ensure that a random number is independent, that a random number cannot be anticipated, and that the random number generator was tested on a representative sample.	<input type="checkbox"/>	<input type="checkbox"/>	N/A. The RNG was evaluated on the report 91507PBLMJ001 (*) issued date 26 th September 2019 by eGaming Compliance Services Limited.
Ord, Article 8	All the features of the software described in Article 7 of this Rulebook must also be confirmed in the report.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 9	In the case of adding new games to the organiser's online system, he/she must obtain the certificate and the report referred to in Article 5	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Regulatory Reference	Regulation applied in Republika Srpska	Results of the Test		
		Pass	Fail	Observations
	of this Rulebook before making them available to be played.			
Ord, Article 12	Organisers must assign unique accounts (virtual accounts) to players, and monetary assets available to players for deposits and earned as winnings in online games of chance are recorded on these accounts.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 13.2	Accounts are unique for every player and are opened by organisers in their online systems after a successful registration of a player.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 13.3	Records are kept on the account about all player's transactions (deposits and payments) regardless of the manner of payment.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 16.1	Payments in online gambling shall be made by a registered player in a cashless manner and shall be visible to the organizer, the player and the Ministry of Finance immediately upon payment, while payments to the players shall be made in cash or cashless.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 16.3	Payment by electronic means in online games of chance shall be considered payment by electronic or digital money, e-cash, e-wallets, vouchers, mobile payment, payment by smart cards, and all other forms of electronic payment.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 16.4	Where payment is made electronically, through an intermediary (vouchers, vouchers, electronic or digital money, e-wallet, etc.), the payment intermediary may be a legal entity obliged to obtain the approval of the Ministry of Finance, subject to the following conditions: 1) is obliged to have a computer system that can be connected to the computer system of the Ministry of Finance for the purpose of monitoring payments in online gambling, 2) is obliged to make payments in online gambling instantaneously visible to the organizer, the player and the Ministry of Finance, 3) is required to have experience in providing gambling brokerage services,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Regulatory Reference	Regulation applied in Republika Srpska	Results of the Test		
		Pass	Fail	Observations
	4) be domiciled in the Republika Srpska and carry out the largest volume of business in the Republika Srpska, 5) has realized a turnover of at least KM 5,000,000 in the field of mediation in payment in games of chance in the last year.			
Ord, Article 16.7	The online gambling operator shall, at each payment and payment, be obliged to check and confirm the registration of the player, to confirm the game of the player, to check the security and internal procedures concerning the player's account and to ensure that the rules relating to the game are applied in accordance with By law.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 16.8	Payments to players' accounts, as well as payments to players, may be made only if the player is registered and holds a virtual account with the organizer.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 89.3	Business is conducted in KM or in foreign currency.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
LGC 92.1	Registered player makes payment for participation in online games of chance by electronic way so that they are visible immediately after payment, cashless, via cashless operations from his bank account or credit cards for cashless payment (credit or debit cards), via electronic transfer or special accounts open in the bank, as well as by another legally prescribed manner that enables electronic operations.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 92.2	Payments to the account of the players as well as payouts to the players can be carried out only if the player is registered and has a virtual account at the organizer.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 92.3	The organizer of online games of chance in every payment or payout must check and confirm registration of the player, check the game of the player, check the security and internal procedures regarding to player account and to assure that rules of games are applied in accordance with the Law.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Regulatory Reference	Regulation applied in Republika Srpska	Results of the Test		
		Pass	Fail	Observations
3. Game Play:				
Ord, Article 10.1.1	The manner in which players can play approved online games of chance must be prescribed by the organiser in the general rules for organising online games of chance (hereinafter, the general rules) which must contain: 1) Information about the name and seat of the organiser,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 10.1.2	2) Number and date of enacting the general rules,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Ord, Article 10.1.3	3) The way players register and the procedure for opening and closing their virtual accounts,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 10.1.4	4) The way deposits are made to play a game,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 10.1.5	5) The way to use the funds on the player's virtual account,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 10.1.6	6) The way winnings are paid to players,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The user account and the payments are out of scope.
Ord, Article 10.1.7	7) The deadline for paying the winnings from the player's virtual account,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 10.1.8	8) Provisions on the ban to take deposits to play online games of chance from persons under the age of 18,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 10.1.9	9) Name and description of a game of chance (rules of the game),	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Ord, Article 10.1.10	10) Promotional bonus (if awarded to players by the organiser).	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 10.1.11	11) The procedure to prevent fraud and money laundering through online games of chance,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 10.1.12	12) Court jurisdiction in cases of disputes between players of online games of chance,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article	13) Signature of the person liable and the stamp	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game

Regulatory Reference	Regulation applied in Republika Srpska	Results of the Test		
		Pass	Fail	Observations
10.1.13	of the organiser who enacts the general rules.			evaluation.
LGC 11.1.2	The following is prohibited: 2) Participation in foreign games of chance when stakes are paid on the territory of the Republic.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 11.1.3	3) Collecting stakes in the Republic for taking part in the games of chance that are being organized abroad.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 11.1.4	4) Sale, possession, cession, publishing, advertising and any other representation of foreign Lottery tickets (cards) for the games of chance in the territory of the Republic.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 11.1.7	7) Organization of games of chance where participants pay certain cash amounts to the participants that joined the game before them and expect payment of certain cash amount from the participants that would join the game after them (cash chain and similar) as well as receiving other payments and promising winnings contrary to Article 6 of this Law.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
LGC 11.1.9	Using the words lottery, lotto, bingo, as well as other names for lottery games of chance in the name of the game of chance that for the purpose of this Law does not belong to the lottery game, except for the Lottery, and using of denomination casino if it is not the casino games.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 17.1	In the event a game is interrupted due to a failure of the organiser's online system which prevents a player from continuing his/her game, the organiser must take all necessary actions to ensure that his/her online system allows the player to continue playing the game, or to allow him/her to continue playing the game where he/she left off when the system restarts.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 17.2	When the system restarts, if organisers are not able to let players continue playing the game interrupted due to a failure of the online system, organisers must inform players that the game was	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Regulatory Reference	Regulation applied in Republika Srpska	Results of the Test		
		Pass	Fail	Observations
	ended and as soon as they determine that the game cannot be continued, they must refund the deposits to the players' virtual accounts.			
Ord, Article 18.1	Organisers must: 1) put on their webpage a notification link about responsible organisation,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 18.2	2) send e-mails to players informing them about all information which may be relevant to players,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 18.3	3) design software which will allow players themselves to limit the highest amount they can deposit during a period, to self-exclude from a game, to determine the highest loss they can sustain during a period, and to determine a period of self-exclusion.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 18.4	4) prevent players from accessing their account immediately after receiving their self-exclusion requests,	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 18.5	5) enable players to check at all times, in a clear and easy- to-follow way, their deposits and winnings made during a period of one year, and for transactions which occurred before that period, within five days after receiving a request.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
Ord, Article 20	Besides the information which must be presented on their webpage, organisers must also present a warning that underage persons are forbidden to play online games of chance.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Tests marked with “(*)” are out of BMM Spain Testlabs s.l.u. scope of testing and are not covered by ENAC accreditation.

4. ADDITIONAL INFORMATION / OBSERVATIONS

Tests marked with “(*)” are out of BMM Spain Testlabs s.l.u. scope of testing and are not covered by ENAC accreditation.

5. CONCLUSION

According to the test results^{1,2} obtained from the testing performed, BMM Spain Testlabs s.l.u. confirms that the item submitted under test conforms to all the relevant Republic Srpska Technical Requirements described in the Scope section.

Yours sincerely,



BMM SPAIN TESTLABS S.L.U.

Patricia García

Director of Services Delivery EURSAM

¹ The results included in this document refer exclusively to the sample tested, such as it is described in the corresponding section.

² BMM Spain Testlabs s.l.u. will not be held responsible for the results extracted from third party test reports, that are referred to in this document.

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