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

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

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GENERAL INFORMATION

Client name & Address:	SubTech Ltd. Abacus Business Centre, Level 1 Birkirkara Bypass Dun Karm Street Birkirkara BKR 9037 Malta
Client Reference Number:	Client Submission Letter Dated 28 th October 2020
Testing dates:	Start date: 2 nd November 2020 End date: 01 st October 2021
Product / Game Description:	Multiple Products (Rolling Report)
Test Category:	Category 0
Jurisdictions Recommended:	Multiple Products (Rolling Report)
Technical Standard used for Evaluation:	<ul style="list-style-type: none"> ▪ Order DI-678 of the Director of Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania approving the requirements for Remote Gambling Devices (16 November 2015) ▪ No.2-R-1037-Clarification letter from the Gaming control authority under the ministry of finances of the Republic of Lithuania. ▪ 2020 m. liepos 2 d. Nr. DIE-496 - amendments to the Requirements for Remote Gaming Devices and introduction of Live Dealer requirements ▪ Order on the gambling supervision authority on the finances of the republic of Lithuania order of the director of the ministry of 16 November 2015 no. DI-678. The claims for remote gambling equipment approval of amendment 2021 July 21 Nr. DIE-443
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, Spain
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, Spain
Conclusion:	Pass
BMM Reference Number:	PANDA-OL.1003
Method/Procedures used:	EURSAM-SPA-MO-04 v5.6
Consultant(s):	Marius-Costin Dracea, Sergio Mouriz, Yaiza Costela, David Correa, Giacomo Quaranta, Enric Ferres

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 Lithuanian market:

- Order DI-678 of the Director of Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania approving the requirements for Remote Gambling Devices (16 November 2015).
- No. 2-R-1037-Clarification letter from the Gaming control authority under the ministry of finances of the Republic of Lithuania.
- 2020 m. liepos 2 d. Nr. DIE-496 - amendments to the Requirements for Remote Gaming Devices and introduction of Live Dealer requirements.
- Order on the gambling supervision authority on the finances of the republic of Lithuania order of the director of the ministry of 16 November 2015 no. DI-678. The claims for remote gambling equipment approval of amendment 2021 July 21 Nr. DIE-443.

2. PRODUCT CHARACTERISTICS (PRODUCT UNDER TEST).

2.1 PLATFORM DESCRIPTION.

N/A, only game evaluation.

2.2 GAME DESCRIPTION.

GAME NAME	GAME VERSION	CHANNELS							APPROVAL DATE
		DESKTOP	FLASH	HTML5 DESKTOP	HTML5 MOBILE	NATIVE IOS	NATIVE ANDROID	MINI VERSION	
Demi Gods II	2.0.5			x	x				04 th October 2021
Demi Gods III	1.2.0			x	x				04 th October 2021
Egyptian Rebirth II	2.1.0			x	x				04 th October 2021
Majestic King	1.3.3			x	x				04 th October 2021
Penny Fruits Xtreme	3.1.0			x	x				04 th October 2021

2.2.1 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.

Buy Feature

The Buy Feature allows you to purchase and immediately trigger a free spins round. By clicking the Buy Feature button you will be presented with a window where you can modify the bet with which you will play the free spins round, here the buy price will be set according to the bet. Clicking the buy button to pay the buy price will trigger the free spins round.

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 spins 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 spins mode, starting from the far left reel, each spin a Stacked Wild symbol will move one reel to the right.

Expanding Wilds

During this free spins mode, when a wild lands 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 spins mode, while the reels are spinning, 3-6 wild symbols will appear on the reels and magnify the chance of winning.

2.2.2 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.

Buy Feature

The Buy Feature allows you to purchase and immediately trigger a free spins round. By clicking the Buy Feature button you will be presented with a window where you can modify the bet with which you will play the free spins round, here the buy price will be set according to the bet. Clicking the buy button to pay the buy price will trigger the free spins round.

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 x300.

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

3 or more full sized Scattered bonus symbols will trigger Free spins Feature. Every time user gets free spins, he will get one of the next consecutive free spins features, were bet per line will stay the sam as the game that trigger the free spins feature and can only be triggered during base game.

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.

Joutunheim: Expanding Wild Feature

When a Wild symbol lands on a position on a reel, it will expand to fill the entire reel.

Midgard: Synced Reels Feature

Each spin starts with 2 different reels becoming synced together. Synced reels will be identical to one another.

Asgard: Prize Box Feature

While the reels are spinning, the prize box will show with every spin a reward to either win a multiplier or extra free spins.

2.2.3 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.

Buy Feature

The Buy Feature allows you to purchase and immediately trigger a free spins round. By clicking the Buy Feature button you will be presented with a window where you can modify the bet with which you will play the free spins round, here the buy price will be set according to the bet. Clicking the buy button to pay the buy price will trigger the free spins round.

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.

2.2.4 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.

Buy Feature

The Buy Feature allows you to purchase and immediately trigger a free spins round. By clicking the Buy Feature button you will be presented with a window where you can modify the bet with which you will play the free spins round, here the buy price will be set according to the bet. Clicking the buy button to pay the buy price will trigger the free spins round.

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.

2.2.5 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.

2.3 MATHEMATICAL EVALUATION.

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.

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

Notes: Demi Gods II does not have Jackpot feature.

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%	95.68%

Notes: Differences due to simulations.

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

Notes: Demi Gods III does not have Jackpot feature.

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.

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

Notes: Egyptian Rebirth II does not have Jackpot feature.

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	96.31%	96.31%	96.36%	96.36%	96.31%
	Bought Feat	95.23%	95.23%	95.25%	95.25%	95.23%

Notes: Differences due to simulations.

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

Notes: Majestic King does not have Jackpot feature.

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	% RTP	% RTP	% RTP			
	MINIMUM	MAXIMUM	MINIMUM	MAXIMUM			
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes: Penny Fruits Xtreme does not have Jackpot feature.

2.4 EVALUATED SOFTWARE.

Product: See Section 2.2					
File Name	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 listed in section 2, against the relevant requirements of the Lithuanian online market:

Order DI-678 of the Director of Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania approving the requirements for Remote Gambling Devices (16 November 2015) amended by 2020 m. liepos 2 d. Nr. DIE-496 - amendments to the Requirements for Remote Gaming Devices and introduction of Live Dealer requirements. Amended on 21 July 2021 by Nr.DIE-443t	Results		
	Pass	Fail	Observations
CHAPTER II BASIC REQUIREMENTS FOR REMOTE GAMBLING DEVICES			
6. Remote gambling devices must automatically check the following:			
6.1 The authenticity of its constituent and other components which affect the outcome of games, through the means of digital signature (for example SHA checksums) or other equivalent methods, at the time when the remote gambling device is switched on and then at a frequency of no more than 24 hours	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Order DI-678 of the Director of Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania approving the requirements for Remote Gambling Devices (16 November 2015) amended by 2020 m. liepos 2 d. Nr. DIE-496 - amendments to the Requirements for Remote Gambling Devices and introduction of Live Dealer requirements. Amended on 21 July 2021 by Nr.DIE-443t	Results		
	Pass	Fail	Observations
after switching on; and			
6.2 The authenticity of the client software (where this is used to connect a remote gambling device and a player device), through the means of digital signature (for example SHA checksums) or other equivalent methods, at the time when the client software establishes a connection to the remote gambling device and then at a frequency of no more than 24 hours after establishment of the connection.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
7. The results of authenticity checks performed by a remote gambling device must be stored in its database for at least 90 calendar days.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
8. A remote gambling device that detects discrepancies of the authenticity of its components (error) shall suspend the operation of all remote gambling that contains the discrepancies (error) and those components that may be affected by these discrepancies (error).	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
9. Whenever a remote gambling device or client software detects authenticity inconsistencies in constituent components of the client software or detects connection interruptions between the remote gambling device and the client software, they must disable the operation of client software.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
10. Remote gambling devices must be designed so as to have the capability to be securely checked, both locally and remotely, to identify at the system level any installed software, including components of the automatic checking software of the remote gambling device itself (hereinafter, "remote gambling device software") and their versions, using a reliable external inspection device prepared by a third party (hereinafter, "external inspection device"). The reliability of external inspection devices must be assessed by an accredited body (laboratory).	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
11. The design of remote gambling devices must be such as to allow for checking their software with an external inspection device	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.

Order DI-678 of the Director of Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania approving the requirements for Remote Gambling Devices (16 November 2015) amended by 2020 m. liepos 2 d. Nr. DIE-496 - amendments to the Requirements for Remote Gambling Devices and introduction of Live Dealer requirements. Amended on 21 July 2021 by Nr.DIE-443t	Results		
	Pass	Fail	Observations
12. Remote gambling devices must ensure that only persons authorised to do so are able to change information in its own records and logs of operations (switching on and off of the device, malfunctions, disabling and enabling of games) (hereinafter, "key operations"). When any of the said data are changed, remote gambling devices must log and store the following for at least 90 days:			
12.1 the changed data element	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
12.2 the initial value of the data element;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
12.3 the changed value of the data element;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
12.4 the date and time of the data element change; and	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
12.5 the person who made the change.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
13. Remote gambling devices must log and store the following for at least 90 days:			
13.1 the player's unique identification number (ID);	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
13.3 the game status (in progress, completed, etc.);	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
13.4 the unique identification number of the game and table (if the game was played at a table);	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
13.5 the unique identification number of the winnings table;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
13.6 the identification number and version of gambling software installed on a remote gambling device;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
13.7 the version of client software (where this is used); and	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
13.8 information on the reasons for disabling and enabling games and player sessions.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
14. Remote gambling devices must have an internal clock which keeps the date and time or a built-in timestamp server (hereinafter, "internal clock"), which shall be used to:			

Order DI-678 of the Director of Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania approving the requirements for Remote Gambling Devices (16 November 2015) amended by 2020 m. liepos 2 d. Nr. DIE-496 - amendments to the Requirements for Remote Gambling Devices and introduction of Live Dealer requirements. Amended on 21 July 2021 by Nr.DIE-443t	Results		
	Pass	Fail	Observations
14.1 form timestamps for key operation;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
14.2 prepare reports;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
14.3 form timestamps for bets placed and gambling operations carried out.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
15 The time kept by the internal clock of a remote gambling device must be clearly visible to the player at all times	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
16. Remote gambling devices must be able to reproduce the following gambling data for at least the last game played by a player:			
16.1 the date and time when a game starts and finishes;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
16.2 the amount of money or credits possessed by a player prior to and after a game;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
16.3 the total amount of bets;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
16.4 amounts of money won or number of credits	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
16.6 the total amount of money won or the number of credits;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
16.7 gambling offers;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games do not have gambling offers.
16.8 gambling operations and their results;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games do not have gambling offers.
16.9 choices made by the player while gambling and their outcomes;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games do not have gambling offers.
16.10 results of game cycle elements; and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
16.11 a replay of the entire game.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
17. Client software and player devices may not:			

Order DI-678 of the Director of Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania approving the requirements for Remote Gambling Devices (16 November 2015) amended by 2020 m. liepos 2 d. Nr. DIE-496 - amendments to the Requirements for Remote Gambling Devices and introduction of Live Dealer requirements. Amended on 21 July 2021 by Nr.DIE-443t	Results		
	Pass	Fail	Observations
17.1 have logic that generates game results;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
17.2 continue games after loss of connection to the remote gambling device; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
17.3 store restricted data	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
18 Exchange of data between and among client software and player devices, except for chat (text, audio, video, etc.) and permitted files (photo and user description, other photos, etc.), shall be prohibited	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
19 Data transmission between remote gambling devices and client software must be encrypted	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
20 Client software functions unrelated to games must not influence gambling.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
21 Prior to initialising a player session, client software and the remote gambling device must detect any incompatibilities or limitations which would prevent client software from working adequately with the remote gambling device.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
22. Whenever a remote gambling device detects incompatibilities or limitations, the following must be performed:			
22.1 the player must be informed about the incompatibilities or limitations detected; and	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
22.2 a player session must not be initialized until the incompatibilities or limitations have been removed.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
22.3 Remote gambling devices must have the capability to disable and enable all or certain games and player sessions.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
CHAPTER III BASIC REQUIREMENTS FOR GAMES CONDUCTED THROUGH REMOTE GAMBLING DEVICES			
23. The purpose of touching (pressing) areas depicted in the player interface must be clearly indicated	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Order DI-678 of the Director of Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania approving the requirements for Remote Gambling Devices (16 November 2015) amended by 2020 m. liepos 2 d. Nr. DIE-496 - amendments to the Requirements for Remote Gambling Devices and introduction of Live Dealer requirements. Amended on 21 July 2021 by Nr.DIE-443t	Results		
	Pass	Fail	Observations
adjacent to the respective areas and/or in the game rules. Touching (pressing) areas and keyboard key combinations lacking a description may not appear in the player interface			
24. Amounts of money represented in the player interface must be in a currency which is a lawful payment and settlement instrument in the Republic of Lithuania.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
25. Any player interface or website accessible through an active link displayed in a clearly visible place in another player interface must at all times provide the possibility to familiarise oneself with the rules of the game.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
26. In the rules of the game, illustrations, payment tables and help screens, all claims and images must be clear and not be misleading to the player. They must also contain the following:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
26.1 information on how costs related to acceptance of bets and paying of winnings will be shared (transfer and other costs, if any), and their amount if these costs will be deducted from the player's prize money;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, Only game evaluation.
26.2. indicates the theoretical percentage of the winning fund and explains in detail the way it has been set up and how the player can achieve it (e.g., by using an optimal strategy);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
26.3. data of winnings tables (This information must include all lucky outcomes and combinations together with the corresponding prize payments expressed as values and in a currency, which is a lawful payment and settlement instrument in the Republic of Lithuania. All prize payments and methods must be theoretically possible;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
26.4. explanation of how to play all elements of the game;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
26.5. the procedure for ending and cancelling	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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	Pass	Fail	Observations
unfinished game cycles.			
27. The maximum prize must be attainable in one game cycle.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
28. Game cycles may only be started after all of the following conditions have been met:			
28.1. the player's gambling account has a sufficient amount of money;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, gambling account is out of scope. Only game evaluation.
28.2 the player has allocated a sufficient amount of money or credit for the game;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
28.3 the player has pressed and released the game-starter button (for example, "Play") or performed an equivalent action.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
29. In addition to the main game, a game cycle may have the following game cycle elements:			
29.1. games, which determine entitlement to free games;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	This applies for Egyptian Rebirth II, Majestic King, Demi Gods II and Demi Gods III.
29.2. bonus "second screen" games;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	This applies for Egyptian Rebirth II and Majestic King.
29.3. games where the player has a right of choice;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	This applies for Egyptian Rebirth II.
29.4. games with rules which allow allocating an additional amount of money or credits; and	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation do not allow additional amount of money or credits.
29.5. secondary gambling functions i.e. risk options (risk taking functions).	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation do not have secondary gambling functions.
30. A play cycle shall be considered completed when the amount of money or credits in the player's respective counters is fully reached or lost.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
31. A play cycle shall not be considered completed when its result is undetermined or is not clearly visible to the player.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
32. Unfinished game cycles must be completed prior	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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to starting a new game cycle.			
33. When players connect to a remote gambling device, the device must present an unfinished game cycle for the player to finish it.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
33.1. Where the player does not need to perform any actions in order to finish a previously unfinished game cycle, the remote gambling device must display to the player the final result of the game cycle and account for the amount of money or credits in the player's respective counters.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
33.2. Where the player does need to perform actions in order to finish a previously unfinished game cycle, the remote gambling device must return the player to the position in the game cycle where the player was prior to the game being interrupted.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation do not have situations where the player does need to perform actions in order to finish a previously unfinished game cycle.
34. Remote gambling devices must hold any bets placed in unfinished game cycles which can still be completed until this is done. Remote gambling devices must clearly display to the player any amounts of money which are on hold in unfinished game cycles.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
35. In the event of remote gambling device malfunctions which prevent the completion of a game cycle, the remote gambling device must cancel such a cycle and refund the bets placed by the player.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
36. The following information must be visible to and easy to locate for the player at all times in the course of a game cycle:			
36.1. the name of the game being played;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
36.2. limits on gambling or bets, such as limits on the duration of gambling, maximum prize value, etc.;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
36.3. gambling offers;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
36.4. gambling operations and their results;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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36.5. the balance of player's current session; and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
36.6. the value of the bet placed (this information must be displayed in game cycle elements where the player can place or increase bets);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
36.7. the value of winnings in the completed game cycle (this information must be displayed until another game cycle is started or bet selections are changed);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
36.8. selections made by the player in the course of the completed game cycle (this information must be displayed until another game cycle is started or until selection changes are made);	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation do not have selections of choice information during the completed game cycle.
36.9. the player's initial selections and player's selection options once the game cycle has started;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation do not have player selections of choice information in initial selections and selection options once the game cycle has started.
36.10. values of winnings for each bet separately and total amount of winnings;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
36.11. the series and number of the special identification mark issued by the Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania; and	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
36.12. the identification number and version of the software.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, only game evaluation.
37. Gambling through a player interface may not be started before the relevant counter readings, connection information and player's session balance for that interface have been updated in the remote gambling device	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Player's session is out of scope.
38. Gambling may not be started automatically when:			
38.1 a game is being selected;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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38.2. the player's gambling account has a sufficient amount of money for gambling; or	<input type="checkbox"/>	<input type="checkbox"/>	N/A, player account is out of scope. Only a game evaluation.
38.3. the game-starter button has been pressed and held down.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
39. A game must not create a false impression for the player that the player is able to control the course of the game using skill.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
40. Gambling functions which influence the creation of any game result or outcome must be performed by the remote gambling device. Their performance must be independent of external factors and devices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
41. Remote gambling devices must display each game result selected and may not change this result.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
42. Remote gambling devices which imitate real devices and their operation (revolving discs, rolling dice, flipping coins, dealing cards, etc.) must ensure that:			
42.1 the imitation it creates corresponds to the behaviour and appearance of the real device;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation do not imitate real devices.
42.2. the probability of any event which may occur in the course of the imitation must be equivalent to the probability of the same event occurring on the real device;	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation do not imitate real devices.
42.3. when several real devices are imitated in the course of a game, the device imitations must be independent of each other.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation do not imitate real devices.
43. When the optimal gambling strategy is based on the information provided in the gambling rules, the percentage of the winning fund must be no less than that indicated in the gambling rules.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
44. Any strategy advice or automatic delays must be fair, not be misleading, not present a bad choice and ensure the minimum share per cent of the return to player.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation do not have any strategy advice or automatic delays.

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45. Players must have the possibility to adjust automatic delays and strategy.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation do not have any strategy advice or automatic delays.
46. Games in which the result depends on the player's physical skill and/or reaction time to the gambling device shall be prohibited.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
47. Random number generators used in remote gambling must be statistically independent and evenly distributed, and their reliability level (confidence interval) must be at least 99 %.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, the RNG has been previously evaluated in the report with reference number 91507PBLMJ001 (*), issued on the 26 th September 2019 by eGaming Compliance Services Limited t/a eCOGRA.
48. Any sorting or distribution method used by a remote gambling device must ensure that all described game results are achievable and created in accordance with prevailing probabilities. Any sorting and matching algorithms must not be biased.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
49. Random number generators must continually generate random numbers irrespective of whether they are being used at a given time to select a game result or not.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, the RNG has been previously evaluated in the report with reference number 91507PBLMJ001 (*), issued on the 26 th September 2019 by eGaming Compliance Services Limited t/a eCOGRA.
CHAPTER IV			
SPECIAL REQUIREMENTS FOR CATEGORY A AND B MACHINE GAMES CONDUCTED THROUGH REMOTE GAMBLING DEVICES			
50. The percentage of the prize fund (RTP) must be:			
50.1 no less than 90 % and no more than 100 % of the total sum of bets received for Category A games; and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
50.2 no less than 80 % and no more than 100 % of the total sum of bets received for Category B games.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation are Category A.
51. The duration of a single game must be:			
51.1 at least 1 second for Category A games; and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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51.2 at least 3 second for Category B games.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation are Category A.
52 In Category B games, the maximum bet value shall be EUR 0.5, while the winnings per single game must not be more than 200 times greater than the amount bet.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation are Category A.
CHAPTER V SPECIAL REQUIREMENTS FOR TABLE GAMES CONDUCTED THROUGH REMOTE GAMBLING DEVICES			
53. Use of software imitating a gambler shall be prohibited.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation are not table games.
54. Remote gambling devices which enable players to play remote table games against one another must:			
54.1 warn players about how software imitating a gambler used by other players can influence the game and must provide the possibility for players to inform the gambling organiser about the potential use of such software; and	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation are not table games.
54.2 ensure that any one player is unable to take more than one gambling seat at the table.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation are not table games.
CHAPTER VI - SPECIAL REQUIREMENTS FOR LIVE REMOTE TABLE GAMES			
55 Live remote table games must be filmed continuously in such a way that the video clearly shows the gambling in progress, the actions taken by the croupier (if the event that results in the gambling result is created with the croupier) and whether the gambling is carried out according to approved rules.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation are not table games.
56 The video records referred to in Article 55 of the requirements shall have a timestamp and be stored for 90 days.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation are not table games.
57 The electronic, electromechanical and mechanical equipment used for remote live table games must ensure that the result of the games is random.	<input type="checkbox"/>	<input type="checkbox"/>	N/A, games under evaluation are not table games.

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Clarification letter from the Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania dated on the 22nd of July 2016. No.2-R-1037			
Remote Gambling devices cannot be connected to the jackpot system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Autoplay function is not allowed to be used in the remote gambling devices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

4. ADDITIONAL INFORMATION/OBSERVATIONS.

- 4.1 The signatures listed under section 2.3 of this test report were generated using the BMM Signatures tool v2.0.5. Where requested, BMM will supply the regulator/operator with this signature verification tool. A user manual will be also supplied.
- 4.2 The technical evaluation of the products listed in the section 2 of this Evaluation Report has been conducted through:
- Web browser: Google Chrome v86
 - Workstation OS: Windows 10

Tests marked with * are not covered by ENAC accreditation.

5. CONCLUSION.

According to the results¹, BMM Spain Testlabs s.l.u. confirms that the item submitted to the tests is compliant with all the relevant Lithuanian Technical Requirements described in the Scope section.

Yours sincerely,

Patricia García

Director of iGaming Services Delivery EURSAM

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

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