



iTech Labs Online Gaming Certification Scheme

Introduction

The Hellenic Gaming Commission (HGC) requires that online gambling systems and their components are certified against the Hellenic Gaming Commission jurisdictional requirements by certification bodies, which operate under ISO/IEC 17025:2017, ISO/IEC 17020:2012 and ISO /IEC 17065:2012.

iTech Global Pty Ltd (trading as iTech Labs), incorporated in Australia, is an industry leading testing company, specialising in independent compliance testing for Online Gaming Systems around the world. iTech Labs holds accreditations for ISO/IEC 17025:2017 and ISO/IEC 17020:2012. iTech Global Pty Ltd is the legally responsible entity for the certification activities of iTech Labs.

As an ISO /IEC 17065:2012 accredited certification body, iTech Labs performs certifications against the Hellenic Gaming Commission jurisdictional requirements, in conformance with the ISO/IEC 17025:2017, ISO/IEC 17020:2012 and ISO /IEC 17065:2012.

iTech Labs has the responsibility to provide impartial product certification services to online operators and manufacturers for the Hellenic Gaming Commission, with competence and integrity. Final certification decisions are made by the iTech Labs Certification Committee.

iTech Labs is responsible for the management of all information obtained or created during the certification activities. At all times, personnel involved in the certification activities, treat all acquired information as confidential and private. This is in accordance with iTech Labs' employment contracts, and Non-Disclosure agreements with customers.

This document is designed to provide comprehensive information for users of the iTech Labs Online Gaming Certification Scheme.

Key Terms and Definitions used (not exhaustive)

Online Gaming: casino games of chance, poker and its variants, provided online, and played either live or using a Random Number Generator.
Online Betting: game of chance played online, which requires players to predict the development in and/or outcome of all manner of events (including virtual events, where the result is generated using a Random Number Generator).
Online Gaming Platform: All hardware and software which provide common features to all games offered, is accessible both to the Player and the Licence Holder (Operator) and is needed for the Licence Holder to organise, operate, run, monitor, record, check and centrally manage the player accounts and the Games of Chance.
Customer / Client: organisation or person responsible to a certification body, for ensuring that certification requirements are fulfilled.
Certification requirement: a specified requirement, including a requirement that relates directly to a product, specified in standards or in other normative documents and identified by the certification scheme, that is fulfilled by the client as a condition of establishing or maintaining certification.
Certification Scheme: a certification system related to specified products, to which the same specified requirements, specific rules and procedures apply (the rules, procedures and management for implementing a product, process and service certification are stipulated by the certification scheme - Clause 3.9, ISO 17065:2012).
Scheme Type 1a: In this scheme, one or more samples of the product are subject to determination activities. A certificate of conformity or other statement of conformity (e.g. a letter) is issued for the product type, the characteristics of which are detailed in either the certificate, or a document referred to in the certificate. Subsequent production items are not covered by the certification body's attestation of conformity. The samples are representative of subsequent production items, which could be referred to by the manufacturer as being manufactured in accordance with the certified type.



The certification body may grant the manufacturer the right to use the type certificate or another statement of conformity (e.g. a letter) as a basis for the manufacturer to declare that the subsequent production items conform to the specified requirements (Clause 5.3.1, ISO 17067:2013).
Conformity Assessment: demonstration that specified requirements (regulations, standards, and technical specifications) are fulfilled.
Surveillance: systematic iteration of conformity assessment activities as a basis for maintaining the validity of the statement of conformity.

Scope and requirements of iTech Labs Online Gaming Certification scheme

The scope of the iTech Labs Online Gaming Certification scheme is the certification of online gaming systems and their components, according to the Hellenic Gaming Commission (HGC) requirements.

iTech Labs is the owner of the iTech Labs Online Gaming Certification scheme.

The scheme is bound to be followed by: iTech Labs as a certification body, all client organisations (Online Gaming Operators and Manufacturers) that have a certification agreement with iTech Labs, or that have applied for one.

The iTech Labs Online Gaming Certification scheme was developed in recognition of the iTech Labs Certification Body's (henceforth referred as 'iTech Labs') responsibility in providing product certification to online operators and manufacturers for the Hellenic Gaming Commission (HGC).

The objectives of the iTech Labs Gaming Certification scheme are:

- To address the needs of all interested parties (online gaming operators, online gaming manufacturers, and regulators) by providing confidence, regarding the fulfilment of applicable standards.
- To demonstrate to the Gambling market that the online gaming systems (and their components) have been attested to fulfil the specified Hellenic Gaming Commission requirements by an impartial third-party body - iTech Labs.
- To add value to online operator's and manufacturer's products, by providing online gaming systems (and their components) certifications for the Hellenic Gaming Commission.

The iTech Labs Online Gaming Certification scheme is classified as a type 1a, and it was prepared based on the guidelines given in ISO/IEC 17067, in order to comply with the requirements of ISO/IEC 17065.

In this scheme, one or more samples of the online gaming systems (and/or their components) (the Product) are subject to determination activities. A certificate of conformity or other statement of conformity (e.g. a letter) is issued for the product type, the characteristics of which are detailed in the certificate, or a document referred to in the certificate. Surveillance of certification products is not required, and is not included in the scheme. Subsequent production items are not covered by iTech Labs' attestation of conformity.

	Conformity assessment functions and activities within the product certification scheme	Type 1a Certification Scheme (x-in scope, N/A- not in scope)
I	Selection , including planning and preparation activities, specification of requirements, e.g. normative documents, and sampling, as applicable	x-in scope



II	Determination of characteristics , as applicable, by: a) testing b) inspection c) design appraisal d) assessment of services or processes e) other determination activities, e.g. verification	x-in scope
III	Review Examining the evidence of conformity obtained during the determination stage, to establish whether the specified requirements have been met	x-in scope
IV	Decision on certification Granting, maintaining, extending, reducing, suspending, and withdrawing certification	x-in scope
V	Attestation, licensing a) issuing a certificate of conformity or other statement of conformity (attestation)	x-in scope
	b) granting the right to use certificates or other statements of conformity	x-in scope
	c) issuing a certificate of conformity for a batch of products	N/A- not in scope
	d) granting the right to use marks of conformity (licensing), based on surveillance (VI) or certification of a batch	N/A- not in scope
VI	Surveillance, as applicable (see 5.3.4 to 5.3.8 of ISO17065:2012), by: a) testing or inspection of samples from the open market	N/A- not in scope
	b) testing or inspection of samples from the factory	N/A- not in scope
	c) assessment of the production, the delivery of the service, or the operation of the process	N/A- not in scope
	d) management system audits, combined with random tests or inspections	N/A- not in scope

iTech Labs will perform all evaluation, inspection or certification activities in accordance with the requirements of the following applicable standards and normative documents:

- ISO/IEC 17020:2012 Conformity Assessment – requirements for the operation of various types of bodies performing inspection
- ISO/IEC 17025:2017 Conformity Assessment – requirements for Testing and calibration laboratories
- ISO/IEC 17065:2012 Conformity Assessment – Requirements for the bodies certifying product, process and services
- ISO 17067:2013 Conformity Assessment – Fundamentals of product certification and guidance for product certification schemes
- ISO 17000:2004 Conformity Assessment – Vocabulary and General principles
- HELLENIC Gaming Commission jurisdictional specific gaming regulations (standards, requirements, and specifications):
 - Decision 79841 EΞ 2020 (Government Gazette 3266 /B) “ Enactment of Regulation on the Technical Specification (TS) for their Organisation and Operation of online games of chance”, August 5, 2020
 - Decision 79835 EΞ 2020 (Government Gazette 3265/B) “Enactment of Gaming Regulation on the Organisation and operation of online games of chance” August 5, 2020



- Decision 79300 ΕΞ 2020 (Government Gazette 3261/B) "Enactment of Gaming Regulation on managing Changes to the Central Information Systems (CIS)" August 5, 2020

The Hellenic Gaming Commission has published on their website the jurisdictional gaming regulations on technical requirements for gambling product certification and accreditations of certification bodies. The Hellenic Gaming Commission is accepting certifications for Technical Means and Materials and/or Studios from certification bodies which operate and are accredited against ISO/IEC 17020:2012, ISO/IEC 17025:2017 and ISO/IEC 17065:2012.

iTech Labs Online Gaming Certification Scheme requirements

- Product requirements for online gaming systems (and their components) as per the Hellenic Gaming Commission jurisdictional specific gaming regulations requirements

<i>Type of Online gaming systems (and their components) products in scope of the scheme:</i>	<i>HGC jurisdictional specific gaming regulations requirements</i>
Online Gaming platforms and systems (software applications or systems, and relevant premises associated with the running of online games of chance)	Decision 79841 ΕΞ 2020 (Government Gazette 3266 /B) Decision 79835 ΕΞ 2020 (Government Gazette 3265/B)
Online Games using Random Number Generators (RNG) (games of chance, poker, and their variants)	Decision 79841 ΕΞ 2020 (Government Gazette 3266 /B) Decision 79835 ΕΞ 2020 (Government Gazette 3265/B)
Any safety requirements applied to the Information Systems, pursuant to the Regulations and Technical Specifications which do not fall under ISO/IEC 27001 certification	Decision 79841 ΕΞ 2020 (Government Gazette 3266 /B) Decision 79835 ΕΞ 2020 (Government Gazette 3265/B)
Online betting platforms and systems (event wagering, fixed and parimutuel betting, and virtual betting)	Decision 79841 ΕΞ 2020 (Government Gazette 3266 /B) Decision 79835 ΕΞ 2020 (Government Gazette 3265/B)
Online Live Dealer Games (games of chance, poker, and their variants)	Decision 79841 ΕΞ 2020 (Government Gazette 3266 /B) Decision 79835 ΕΞ 2020 (Government Gazette 3265/B)
Monitoring, accounting and control systems (including regulator reporting systems), used by online gaming	Decision 79841 ΕΞ 2020 (Government Gazette 3266 /B) Decision 79835 ΕΞ 2020 (Government Gazette 3265/B)
Random Number Generators (RNG) – software and hardware implementations	Decision 79841 ΕΞ 2020 (Government Gazette 3266 /B) Decision 79835 ΕΞ 2020 (Government Gazette 3265/B)
Online Jackpot Systems (including progressive)	Decision 79841 ΕΞ 2020 (Government Gazette 3266 /B) Decision 79835 ΕΞ 2020 (Government Gazette 3265/B)
Changes to the products (as per the Change Management requirements)	Decision 79300 ΕΞ 2020 (Government Gazette 3261/B)

- Other Requirements to be fulfilled by the Client's organisations (Online Gaming Operators and Manufacturers):
 - Signing a certification agreement.
 - Meeting arrangements for the selection and sampling process, testing, assessment, and auditing.
 - Payment of necessary fees.
 - Signing an agreement for the use of certification documents.
 - Providing product information throughout the certification process, and after certification, as needed.



Sampling

In accordance with the characteristics of the type of product to be certified, sampling may be used (as indicated):

<i>Type of Online gaming systems (and their components) products in scope of the scheme:</i>	<i>Determination method and Sampling used</i>
Online Gaming platforms and systems (software applications or systems, and relevant premises associated with the running of online games of chance)	Assessment of functionality; Documentation review; testing/inspection where required. Sampling where multiple components perform the same function or use the same source code and configuration. Sampling of inputs used for testing (e.g. deposit, withdrawal amounts, and limits on betting)
Online Games using Random Number Generators (RNG) (games of chance, poker, and their variants)	Individual games: testing/inspection; assessment of mathematical design; sampling so tests include each unique component of the design at least once. Groups of games: testing/inspection; assessment of mathematical design; where games share a common code base with different parameters, sampling is used to test combinations of parameters that have changed.
Any safety requirements applied to the Information Systems, pursuant to the Regulations and Technical Specifications which do not fall under ISO/IEC 27001 certification	Documentation review, assessment of implementation; sampling of specific event handling, e.g. for detailed review of firewall logs or of security alerts; if there are different classes of alerts or processes, choose a sample from each.
Online betting platforms and systems (event wagering, fixed and parimutuel betting, and virtual betting)	Assessment of functionality; documentation review; testing/inspection for each action required by the regulator, e.g. race entry, outcomes, changes to results, voiding, system limits, automated resulting, links to financial systems, exclusions, and reporting. Sampling for each bet type, ranges of odds, minimum and maximum runners, etc.
Online Live Dealer Games (games of chance, poker, and their variants)	Assessment of services/processes; testing/inspection for player actions versus rules, sampling across a range of games covering every player outcome (win, lose, draw), but not every possible outcome.
Monitoring, accounting and control systems (including regulator reporting systems), used by online gaming	Documentation review, design appraisal; assessment of functionality; sampling to test/inspect each class of event to monitor, account, or report.
Random Number Generators (RNG) – software and hardware implementations	RNGs: testing/inspection; assessment; sampling of at least two sets of 80 million bits for standard statistical tests.
Online Jackpot Systems (including progressive)	Testing/inspection; assessment of mathematical design; sampling (of jackpot contributions and wins) from a variety of games at different bet levels, to ensure correct operation and fairness.
Changes to the products (as per the Change Management requirements)	Documentation review; assessment of changes and effects of linked components; inspection of unchanged components to confirm this; verification of versions and checksums at each baseline; assess whether documented changes in the period match the record of actual change to the system. Depending on the products affected by the changes, sampling is done for products affected, ensuring that each change is tested on at least one affected product.



Duties and Responsibilities

Impartiality is one of the core values of iTech Labs in performing testing and certification activities. iTech Labs' top management and staff understand and adhere to iTech Labs' Impartiality Policy and procedures, in carrying out all activities related to testing and certification. To preserve objectivity, iTech Labs manages any conflict of interest and any potential conflict of interest for existing and new clients.

Decisions related to certification are not influenced by any conflict of interest or activities of internal and/or external parties, and are solely based on conformity evidence and facts.

iTech Labs has tools for managing risks to impartiality, including but not limited to: declarations of any personnel conflicts of interest, Annual Impartiality Declarations, and Annual Management Reviews.

Liability is limited to iTech Labs' assets and staff (both permanent and contract). The amount of iTech Labs insurance for general liability and professional liability ensures there is appropriate cover for the provided testing and certification services.

iTech Labs evaluates and monitors finances and sources of income monthly and quarterly. iTech Labs is highly profitable and has been growing strongly in recent years. These evaluations ensure that commercial, financial, and other pressures do not compromise the provision of impartial testing and certification services.

All certification applicants are treated fairly, and in accordance with the requirements outlined in ISO/IEC 17065:2012. By following internally developed procedures and policies, based on the standards defined in the scheme, iTech Labs ensures that the certification process does not depend on applicants' size, membership or any previous number of certifications held by the applicant. iTech Labs does not discriminate against any applicant for certification, whose activities fall within the scope of the iTech Labs Online Gaming Certification scheme. Fees for certification are clearly and transparently shown in the proposal (agreement).

As required in accordance with our ISO/IEC 17025:2017 accreditation, iTech Labs has processes for the determination of competence criteria and competence evaluation, to ensure that all categories of personnel involved throughout the certification activities demonstrate knowledge and skills, as required, in their areas of responsibility. A Skills matrix is maintained for all personnel involved in the evaluations. iTech Labs has documented processes for the initial competence evaluation, as well as ongoing monitoring of competence and performance, of all personnel involved in certification activities.

Certification Process

iTech Labs' certification process is described below. The procedures for testing and inspections are according to iTech Labs ISO/IEC 17025:2017 & ISO/IEC 17020:2012 accreditations.

iTech Lab certification process is based on ISO /IEC 17067 and guidelines for product certification schemes. The certification process ensures that products are certified in compliance with the relevant applicable requirements as defined in the scope of the scheme.

➤ Selection

Selection involves planning and preparation activities, to collect or produce all the information and input needed for the subsequent **determination** function.

- **Application for certification and certification agreement**

On receipt of a request, regarding certification against ISO/IEC 17065:2012, iTech Labs will forward the 'ITL_IID Initial Information Document' for completion by the client applying for certification.

The client makes an application to iTech Labs for certification of its specified products. The application provides iTech Labs with all necessary information to enable it to plan the evaluation and certification process.



Client and Product information to be submitted* must include the following:

Information regarding the client requiring certification	This includes: <ul style="list-style-type: none"> • Legal name of the applicant, address of its registered office, and contact details • Relationship to any parent company (if applicable) • Name and function of the person acting as contact to the certification body and authorized to sign on behalf of the applicant • Business address • Role of applicant organization (manufacturer, operator, etc.) • Information on any outsourced process used by the client that may have an impact on conformity
Information regarding intended certificate holder	Similar details as the client are needed, only if they are different from client's details.
Designation of product(s) for which certification is requested	This includes: <ul style="list-style-type: none"> • List of products and quantities • Description of product(s), including descriptive identifier(s), names, and versions • Jurisdictional standard(s) and other normative document(s) to which certification is requested: number, title, and year of issue
Manufacture of product(s)	Similar details as the client are needed, only if they are different from client's details.
Certification and licensing agreements	Declaration of willingness, on satisfactory completion of evaluation, to conclude the applicable certification agreement and licensing agreement, if not previously concluded.

* The above information is to be submitted using the form 'ITL_IID Initial Information' document.

Based on the information received, there may be further clarification required, to enable the preparation of the certification agreement. If the information provided is not clear or sufficient, iTech Labs will ask clarifying questions (via email or during a meeting).

- **Application review**

iTech Labs conducts a review on the information obtained, to ensure that:

- the provided client and product information is sufficient for the certification agreement;
- there are no differences in understanding between the client and iTech Labs, regarding standards or any other normative documents;
- The certification scope is clear and defined;
- iTech Labs has sufficient and appropriate means, competence, and capacity, to perform all required certification activities.

- **Certification Agreement**

On completion of the review, iTech Labs notifies the client whether the information provided is satisfactory, and if so, provides a proposal for certification (certification agreement). The proposal will include the scope of evaluation, applicable jurisdictional standards, submission requirements, a proposed schedule, reporting during the valuation, deliverables, price, payment terms and Terms & Conditions. The agreement with the client generally has fixed price agreements, with no additional costs involved for the additional evaluation required after resolution of non-conformances. In case of specific projects where additional costs are involved, this will be specified in the proposal, including in the payment terms.

iTech Labs uses proposals with each client as legally enforceable agreements for the provision of certification activities, in accordance with the relevant requirements. The proposals are binding contracts and are signed by both iTech Labs and the client. The period of validity of the agreement is specified in the proposal's Terms and Conditions. The proposal takes into account the responsibilities of iTech Labs and its clients.



iTech Labs reserves the right to make its own decisions, relating to: the granting, refusal, and maintaining of certification; the expansion or reduction of the scope of certification; the renewal, suspension, or restoration following a suspension; or the withdrawal of certification. By signing the agreement, the customer agrees to follow and comply with iTech Labs' certification agreement, the Terms and Conditions, and rules.

➤ Determination

During this function, iTech Labs gathers information to determine the extent to which the client demonstrates its fulfilment of certification requirements.

Submission required for Determination (Evaluation):

Type of product	Required submission:
Online Gaming platforms and systems (software applications or systems, and relevant premises associated with the running of online games of chance)	<p>Documentation on the functionality, operation, procedures, and policies used in operation, related to:</p> <ul style="list-style-type: none"> • Player registration and account management • Payment methods (deposit and withdrawal) • Player protection • Privacy • Data logging, transmission, and recovery <p>Back of house access. Online test system for remote testing and test accounts. Source code. The Platform certification process usually requires at least one game to be available. The game itself is not subject to the certification, but is needed in order to verify certain platform functions.</p>
Online Games using Random Number Generators (RNG) (games of chance, poker, and their variants)	<p>Game rules, pay-tables, game mathematics documents, game configuration documents. Online test systems for remote testing, test accounts, emulation testing tools (for bypassing the RNG to verify game results). Simulation results. Source code.</p>
Any safety requirements applied to the Information Systems, pursuant to the Regulations and Technical Specifications which do not fall under ISO/IEC 27001 certification	<p>Documentation on the operation, procedures and policies used in operation, related to:</p> <ul style="list-style-type: none"> • Information systems security • Network diagram • Evidence of implementation
Online betting platform and systems (event wagering, fixed and parimutuel betting, and virtual betting)	<p>Documentation on the functionality, operation, procedures, and policies used in operation, related to:</p> <ul style="list-style-type: none"> • Player registration and account management • Payment methods (deposit and withdrawal) • Player protection • Privacy • Data logging, transmission, and recovery <p>Back of house access. Online test system for remote testing and test accounts. Source code. Betting system configuration, rules on betting, documentation on management of events. Mathematical documentation on parimutuel betting (if applicable). The game itself is not subject to the certification, but is needed in order to verify certain platform functions.</p>
Online Live Dealer Games (games of chance, poker, and their variants)	<p>Game rules, pay-tables, game mathematics documents, game configuration documents.</p>



Type of product	Required submission:
	Online test system for remote testing, test accounts, combination testing tools (for bypassing the RNG to verify game results). Simulation results. Source code.
Monitoring, accounting, and control systems (including regulator reporting systems), used by online gaming	Documentation on the operation, procedures and policies used in operation, related to the control subsystem. Required games, platform functionality to be tested. Evidence of implementation.
Random Number Generators (RNG) – software and hardware implementations	Source code of the implementation of the RNG Game code snippets calling the RNG Type of games (e.g. slots, dice, card games) for which the RNG needs to be evaluated
Online Jackpot Systems (including progressive)	Rules, game mathematics documents, jackpot configuration documents. Usually tested together with the game. Online test system for remote testing, test accounts, combination testing tool (for bypassing the RNG in testing). Simulation results. Source code.
Changes to the products (as per the Change Management requirements)	Details on any significant changes to the CIS, which may affect valid certifications and/or result in conditions arising which may pose a risk to the lawful running of Games, in accordance with the Regulatory Framework.

Note: Submission requirements are included in our proposal (Agreement to be signed).

Determination (Evaluation) activities are undertaken to develop complete information regarding the fulfilment of the specified requirements, by the object of conformity assessment or its sample.

These activities include:

- Testing and inspection
- Review of rules, artwork, and critical source code, as required by the type of product
- Review of relevant procedures/processes, as required by the type of product

• Evaluation Plan

Each project is assigned a Project manager and Team Leader, to manage the determination (evaluation) activities.

In accordance with the certification scope, the project manager develops a project plan according to our management system, and assigns competent personnel to each task. The plan consists of project timelines, assigning resources and a selection of iTech Labs' internal checklists, according to the relevant jurisdictional requirements.

Details on Type of product and Evaluation methods used (based on specific applicable requirements relating to the characteristics of the object of conformity).

Type of product	Evaluation methods used
Online Gaming platforms and systems (software applications or systems, and relevant premises associated with the running of online games of chance) (Requested by Manufacturer or Licence Holder)	iTech Labs has developed internal checklists consisting of the following evaluation methods and requirements: Evaluation methods: <ul style="list-style-type: none"> ➤ Functional testing where applicable ➤ Source code review of critical modules ➤ Review of procedures/processes where applicable.



Type of product	Evaluation methods used
	<p>The following requirements from the HGC regulations are covered in our checklists:</p> <p>Government Gazette 3266):</p> <ul style="list-style-type: none"> • Chapter 2. Gaming Platform Requirements <p>Government Gazette 3265:</p> <ul style="list-style-type: none"> • Article 7 COMMERCIAL COMMUNICATION • Article 18 STANDARD FORM CONTRACT • Article 19 PLAYER ONLINE ACCOUNT • Article 20 PLAYER EXCLUSION • Article 21 CLOSURE OF THE PLAYER ONLINE ACCOUNT • Article 22 INACTIVE ONLINE ACCOUNTS • Article 23 BLOCKING OF ONLINE ACCOUNTS • Article 24 PLAYING ACTIVITY LIMITS • Article 25 CASH TRANSFERS • Article 34 RECORD-KEEPING
<p>Online Games using Random Number Generators (RNG) (games of chance, poker and their variants)</p> <p>(Requested by Manufacturer or Licence Holder)</p>	<p>iTech Labs has developed internal checklists consisting of the following evaluation methods and requirements:</p> <p>Evaluation methods:</p> <ul style="list-style-type: none"> ➤ Functional testing where applicable ➤ Source code review of critical modules ➤ Game rules & artwork evaluation ➤ Game maths evaluation ➤ Game outcome tests ➤ Review of procedures/processes where applicable. <p>The following requirements from the HGC regulations are covered in our checklists:</p> <p>Government Gazette 3266:</p> <ul style="list-style-type: none"> • Chapter 3. Game Requirements <p>Government Gazette 3265:</p> <ul style="list-style-type: none"> • Article 12 OTHER ONLINE GAMES • Article 16 PARTICIPATION IN GAMES • Article 17 GAME GUIDE
<p>Any safety requirements applied to the Information Systems pursuant to the Regulations and Technical Specifications which do not fall under ISO/IEC 27001 certification</p> <p>(Requested by Manufacturer or Licence Holder)</p>	<p>iTech Labs has developed internal checklists consisting of the following evaluation methods and requirements:</p> <p>Evaluation methods:</p> <p>Functional testing where applicable.</p> <ul style="list-style-type: none"> ➤ Review of procedures/processes where applicable. <p>The following requirements from the HGC regulations are covered in our checklists:</p> <p>Government Gazette 3266:</p> <ul style="list-style-type: none"> • Chapter 4. IT System security <p>Government Gazette 3266:</p> <ul style="list-style-type: none"> • Chapter 8. Safety of IT Infrastructure



Type of product	Evaluation methods used
<p>Online betting platform and systems (event wagering, fixed and parimutuel betting, and virtual betting)</p> <p>(Requested by Manufacturer or Licence Holder)</p>	<p>iTech Labs has developed internal checklists consisting of the following evaluation methods and requirements:</p> <p>Evaluation methods:</p> <p>Functional testing where applicable</p> <ul style="list-style-type: none"> ➤ Source code review of critical modules ➤ Game rules & artwork evaluation ➤ Game outcome tests ➤ Review of procedures/processes where applicable. <p>The following requirements from the HGC regulations are covered in our checklists:</p> <p>Government Gazette 3266:</p> <ul style="list-style-type: none"> • Chapter 5. Event Wagering <p>Government Gazette 3265:</p> <ul style="list-style-type: none"> • Article 11 BETTING EVENTS
<p>Online Live Dealer Games (games of chance, poker and their variants)</p> <p>(Requested by Manufacturer or Licence Holder)</p>	<p>iTech Labs has developed internal checklists consisting of the following evaluation methods and requirements:</p> <p>Evaluation methods:</p> <ul style="list-style-type: none"> ➤ Functional testing where applicable ➤ Source code review of critical modules ➤ Game artwork evaluation ➤ Game maths evaluation ➤ Game outcome tests ➤ Review of procedures/processes where applicable. <p>The following requirements from the HGC regulations are covered in our checklists:</p> <p>Government Gazette 3266:</p> <ul style="list-style-type: none"> • Chapter 6. Requirements for live dealer games <p>Government Gazette 3265</p> <ul style="list-style-type: none"> • Article 15 STUDIOS • Article 16 PARTICIPATION IN GAMES • Article 17 GAME GUIDE
<p>Monitoring, accounting and control systems (including regulator reporting systems), used by online gaming</p> <p>(Requested by Manufacturer or Licence Holder)</p>	<p>iTech Labs has developed internal checklists consisting of the following evaluation methods and requirements:</p> <p>Evaluation methods:</p> <ul style="list-style-type: none"> ➤ Functional testing where applicable. ➤ Source code review of critical modules ➤ Review of procedures/processes where applicable. <p>The following requirements from the HGC regulations are covered in our checklists:</p> <p>Government Gazette 3266:</p> <ul style="list-style-type: none"> • Chapter 7. Intermediate Control System <p>Government Gazette 3265:</p> <ul style="list-style-type: none"> • Article 33 INTERMEDIATE CONTROL SYSTEM



Type of product	Evaluation methods used
<p>Random Number Generators (RNG) – software and hardware implementations</p> <p>(Requested by Manufacturer)</p>	<p>iTech Labs has developed internal checklists consisting of the following evaluation methods and requirements:</p> <p>Evaluation methods:</p> <ul style="list-style-type: none"> ➤ Source code review ➤ Statistical tests <p>The following requirements from the HGC regulations are covered in our checklists:</p> <p>Government Gazette 3266:</p> <ul style="list-style-type: none"> • Chapter 9. Random Number Generator
<p>Online Jackpot Systems (including progressive)</p> <p>(Requested by Manufacturer or Licence Holder)</p>	<p>iTech Labs has developed internal checklists consisting of the following evaluation methods and requirements:</p> <p>Evaluation methods:</p> <ul style="list-style-type: none"> ➤ Functional testing where applicable. ➤ Source code review of critical modules ➤ Jackpot payouts ➤ Review of procedures/processes where applicable. <p>The following requirements from the HGC regulations are covered in our checklists:</p> <p>Government Gazette 3266:</p> <ul style="list-style-type: none"> • Chapter 10. Progressive Jackpot <p>Government Gazette 3265:</p> <ul style="list-style-type: none"> • Article 13 JACKPOT MODE
<p>Changes to the products (as per the Change Management requirements)</p> <p>(Requested by Manufacturer or Licence Holder)</p>	<p>iTech Labs has developed internal checklists consisting of the following evaluation methods and requirements:</p> <p>Evaluation methods:</p> <ul style="list-style-type: none"> ➤ Review of procedures/processes where applicable. <p>The following requirements from the HGC regulations are covered in our checklists:</p> <p>Government Gazette 3261:</p> <ul style="list-style-type: none"> • Managing Significant changes • Management of exceptionally urgent Significant Changes • Quarterly change report

• **Product Evaluation and resources**

The evaluation activities are performed in accordance with the project plan and the standards and methods listed in the table above (*Details on Type of product and Evaluation methods used*). The objective is to ascertain if the product fulfils the specified jurisdictional requirements.

The evaluation activities are always performed by appropriately qualified personnel based on their qualifications, authorisations and experience in accordance with confidentiality and impartiality requirements. iTech Labs does not use subcontractors.



➤ Nonconformities

All non-conformities are recorded in iTech Labs Project management system with clear reference to the jurisdictional requirements. Progress for each module is also recorded in iTech Labs project management system. The client is notified of non-conformances and progress in weekly or bi-weekly reports (Defects report and Progress report).

If the client expresses interest in continuing the certification process, iTech Labs will provide any additional information about the non-conformities and the evaluation tasks needed to be completed. As the agreement with the client is generally fixed price agreements, no additional cost is involved for the additional evaluation required after resolution of non-conformances. In case of additional costs, this is clearly mentioned in the agreement with the client.

If the client agrees to the completion of the additional evaluation tasks, and upon receipt of resolution of non-conformities, the project manager revises the evaluation plan and re-assigns personnel. The conformity assessment process or parts of it are repeated to complete the additional evaluation tasks.

The above process (reporting and resolution of non-conformities) is repeated until all non-conformities are resolved. After confirming resolution of non-conformities, the project management system is updated and the client is informed.

➤ Evaluation report

As part of the evaluation, internal checklists are used to ensure that all requirements are met, results are recorded, and evidence are kept. The outcomes of all evaluation activities, results and relevant evidence are documented and after satisfactory resolution of any nonconformities, an Evaluation report on the assessment team findings is prepared. The report will be considered as part of the total package of evidence to demonstrate compliance with the certification requirements by the certification body's person or group responsible for making the certification decision.

- **Use of conformity assessment results from other Conformity Assessment Bodies (CAB)**

In some cases, on request from the customer, iTech Labs can accept conformity assessment results from other Conformity Assessment Bodies, if the following conditions are met:

- ✓ The customer requests acceptance of the conformity assessment results (test results of the parts of the product) before signing a certification agreement with iTech Labs.
- ✓ The other Conformity Assessment Body is accredited by any mutually recognised accreditation body for the relevant ISO standards.
- ✓ The scope of accreditation requirements is as defined in the iTech Labs Online Gaming Certification scheme.

The conformity assessment results that can be accepted are:

- ✓ Test reports issued to the customer by another Conformity Assessment Body accredited against ISO/IEC 17025:2017;
- ✓ Inspection reports issued to the customer by another Conformity Assessment Body accredited against ISO/IEC 17020:2012;

subject to other Conformity Assessment Bodies satisfying the following conditions:

- ✓ The test and inspection reports cover all relevant jurisdictional requirements.
- ✓ The results in these reports show compliance.
- ✓ The reports are current / valid as per the applicable requirements.

➤ Review

On completion of the evaluation process, the outcome of all evaluation activities, results and relevant evidences of the product compliance with the defined certification scheme and the evaluation report are gathered and presented for an independent review by a senior staff member, not involved in the evaluation process.



The aim of this review is to ensure that they provide a suitable, adequate, and effective demonstration that the product fulfil the specified requirements.

If the evidence is sufficient, a recommendation for certification is made. The Evaluation report, the results of the review and recommendations are sent to the Certification Committee.

➤ **Certification decision**

The **Certification decision** is the consideration of the suitability, adequacy and effectiveness of the selection and determination activities, as well as the results of these activities, with regard to the fulfilment of specified requirements for the object of conformity assessment.

iTech Labs is responsible for, and retains authority for, all decisions related to certification under this scheme. The certification decision is drawn upon review of all information related to the evaluation, documentation, results, independent review and relevant information from the whole certification process. The certification decision is made by the Certification Committee, not involved in the evaluation activities.

iTech Labs will inform the client of the certification decision.

In case the outcome of the review is positive, iTech Labs decides to grant the certification. As a result of the positive decision, the client will be provided final certification report and certificate. The certification documents reflect the scope of certification in detail, including unique certification number, name of scheme under which the certificate is issued, name and address of the certification body, name and address of the certificate holder, reference to certification agreement, statement of conformity, the date of the certification, and the expiry date of the certification and legally binding signature of authorised personnel.

In case the outcome of the review is negative, iTech Labs decides not to grant the certification and in addition to the decision, the client will also be provided with the reasons for the negative decision.

➤ **Attestation, licensing**

iTech Labs will issue formal certification only upon fulfilment of the following conditions:

- The certification agreement (proposal) has been completed /signed by both parties.
- Payments have been received.
- Certification requirements have been satisfied.
- The decision to grant or extend the scope of certification have been made.

Following the decision to grant certification, iTech Labs issues a statement of conformity.

Under this scheme, the statement of conformity is in the form of a certificate. The certificate will be listed on iTech Lab's website subject to client's approval.

iTech Labs certificate clearly displays the reference to the scheme, lists the Identification of the subject of the assessment and display a statement of conformity - "Summary of the outcome of the assessment: Comply". The client will be granted the right to use the certificates and other statements of conformity.

Use of certificates and marks

iTech Labs is the owner of this certification scheme and the scheme can be used for certification only by iTech Labs. iTech Labs is the authorised entity to make all decisions related to certifications made under this scheme.

iTech Labs is the only certification body that can refer to this certification scheme in marketing or public materials. iTech Labs ensures control over the ownership, use and display of certificates, and any mechanisms for indicating a product or service is certified.

iTech Labs' Terms and Conditions/Rules define all the information related to use of certificates.

iTech Labs has rules governing the use of any statement or accompanying information, related to certification, under this scheme. iTech Labs will take suitable action when dealing with incorrect references to certification status or misleading use of certification documents, marks, or certification statements.

The iTech Labs Online Gaming Certification scheme does not cover the use of certification marks.



➤ **Termination, reduction, suspension or withdrawal of certification**

iTech Labs' product certification process is performed within a defined period of time and includes obtaining a baseline – a digital signature of the certified product, among other evidence. Any current certification becomes suspended upon major changes to the certified product, or changes to the digital signature, which then requires a conformity assessment, as part of a new certification process. The new certification process will result in a new certificate, which will replace the previous one.

In cases of non-conformance in certified products being identified by, or reported to iTech Labs, iTech Labs will investigate, consider and decide on appropriate action, which may include:

- Evaluation, review and/or a certification decision, as per iTech Labs' scheme, and issuing a new certificate to replace the previous one. The new certification process will start once the non-conformity has been rectified and will go through the same conformity assessment process defined in this scheme.
- Conditional continuation of the certification - iTech Labs will define and impose additional conditions that the customer must implement and follow.
- Reduction in the scope of certification to remove the non-conforming product variant.
- Suspension of the certification, pending remedial action by the client.
- Withdrawal of the certification.

In cases iTech Labs suspends/withdraws the certification, the client will be clearly informed on what actions are needed to end the suspension/withdrawal and restore certification, according to the iTech Labs Online Gaming Certification scheme, and any additional relevant actions and requirements that are considered appropriate by iTech Labs.

Changes affecting certification

iTech Labs' Management System has a process for monitoring the development of the standards and other normative documents, which define the specified requirements used in the scheme.

In case the certification scheme presents new or updated requirements that affect the client certification, changes are implemented, as per the process in our Management System, and iTech Labs ensures that details of the changes are communicated to all clients. iTech Labs verifies the implementation of the changes by the clients and follows the certification steps required by the scheme.

In cases where the client introduces changes into the certified product, iTech Labs will decide upon appropriate actions (selection, determination, review, decision, issuance of a revised formal certification document to extend or reduce the scope of certification, etc.) in accordance with the scheme.

As a scheme owner, iTech Labs will review the operation of the scheme on a periodic basis (at least annually) in order to confirm it is meeting its objectives, and to identify aspects that require improvement.

Directory of certified products

iTech Labs maintains details on all certified products. iTech Labs preserves information such as:

- Certification number
- Identification of the client and product
- The standard and other normative documentation to which conformity has been certified
- Formal certification documents

iTech Labs will provide information, upon request, about the validity of a given certification.

Records

iTech Labs maintains and keeps records on all certifications including results and evidences. iTech Labs ensures that record confidentiality is upheld during retention, transport, transmission or transfer in any way.



Publicly available information

iTech Labs maintains on its website, and on request, makes available, iTech Labs' Online Gaming certification scheme, including: evaluation methods; relevant jurisdictional standards, certification activities, rules and procedures for granting, maintaining, extending or reducing the scope of certification; or for suspending, withdrawing or refusing certification, information on complaints and appeals and terms & conditions. Additionally, iTech Labs maintains, and on request, makes available: general information on the fees charged to applicants and to clients and any additional relevant information as requested by the clients.

The public information will be available on www.itechlabs.com/certification

Confidentiality

iTech Labs is responsible for the management of all information obtained or created during the certification activities. At all times, personnel involved in the certification activities, treat all acquired information as confidential and private. This is in accordance with iTech Labs' employment contract, which is a legally enforceable agreement at all levels.

Information about the client, from sources other than the client (e.g. complainant or regulators), is and shall be treated as confidential, consistent with iTech Lab's policies.

iTech Labs will inform the client in advance, of the information it intends to place in the public domain. All other information, except for information that is made publicly accessible by the client, is and shall be considered confidential.

Except as required by the certification standards, information about a particular certified client will not be disclosed to a third party, without the written consent of the certified client.

When iTech Labs is required by law or authorised by contractual arrangements (such as with the accreditation body), to release confidential information, the client concerned shall, unless prohibited by law, be notified of the information provided.

iTech Labs has processes and, where applicable, equipment and facilities that ensure the secure handling of confidential information

Product Liability

In this scheme, all questions related to product liability are dealt with on the basis of the relevant legal system(s).

Complaints and appeals

iTech Labs has a documented process to receive, evaluate and make decisions on complaints and appeals, related to the certification, and products related to this scheme.

Upon receipt of a complaint or appeal, iTech Labs will log the complaint in our system, send acknowledgement to the client, investigate, and confirm that the complaint or appeal relates to iTech Labs' certification activities, and if so, will address it. The client will be informed of the progress and final decision.

iTech Labs is responsible for all decisions, at all levels, of the complaints and appeals handling process. iTech Labs ensures that the persons engaged in the complaint and appeal handling process, are different from those who carried out the evaluation and made the certification decisions.

iTech Labs will provide a formal notice of the outcome of the investigation to the complainant and/or appellant.

The submission, investigation and decision on complaints and appeals shall not result in any discriminatory actions against the complainant or appellant.



Certification agreement Rules

The customer agrees to follow and abide by iTech Labs' certification rules as below:

1. The customer always fulfils the certification requirements, including implementing appropriate changes when they are communicated by iTech Labs. This will include product requirements that are fulfilled by the client, as a condition for establishing and maintaining certification. Product requirements relate directly to a product, specified in standards, regulations and specifications, or are imposed by the certification scheme.
2. If the certification applies to ongoing production, the client agrees that the certified product continues to fulfil the product requirements (specified in standards, regulations and specifications or imposed by the certification scheme).
3. The client agrees to make all necessary arrangements for:
 - the conduct of the evaluation and surveillance (if required), including provision for examining documentation and records, and access to the relevant equipment, location(s), area(s), personnel, and client's subcontractors;
 - investigation of complaints;
 - the participation of observers, if applicable;
4. The client makes any claims regarding certification, consistent with the scope of certification:
 - the products, processes or services for which certification is granted;
 - the applicable certification scheme;
 - the standards, regulations, specifications and the certification scheme, by which it is judged that the products\processes\services comply.
5. The client does not use its product certification in such a manner as to bring the certification body into disrepute, and does not make any statement regarding its product certification that the certification body may consider misleading or unauthorised.
6. The client agrees that upon suspension, withdrawal, or termination of certification, the client discontinues its use of all advertising matter that contains any reference thereto, and takes action, as required, by the certification scheme (e.g. the return of certification documents), and takes any other required measure.
7. If the client provides copies of the certification documents to others, the documents shall be reproduced in their entirety, or as specified in the certification scheme.
8. The client agrees that in making reference to its product certification in communication media, such as documents, brochures or advertising, the client complies with the requirements of the certification body, or as specified by the certification scheme.
9. The client complies with any requirements that may be prescribed in the certification scheme, relating to the use of marks of conformity, and on information related to the product.
10. The client agrees to keep a record of all complaints made known to it, relating to compliance with certification requirements, and makes these records available to the certification body when requested, and takes appropriate action with respect to such complaints and any deficiencies found in products that affect compliance, with the requirements for certification, and documents the actions taken.
11. The client agrees to inform the certification body, without delay, of changes that may affect its ability to conform to the certification requirements. Changes can include the following:
 - the legal, commercial, organisational status or ownership,
 - organisation and management (e.g. key managerial, decision-making or technical staff),
 - modifications to the product or the production method,
 - contact addresses and production sites,
 - major changes to the quality management system.
12. Where witnessed assessments are deemed necessary, the client agrees to provide, on request, access to the United Kingdom Accreditation Service (UKAS) representatives, to assess the certification body's performance in carrying out conformity assessment activities at the client's premises.
13. A certificate or report issued by the certification body in no way implies that any product, service, or management system is approved by UKAS.

Revision Updated	Date	Description of Change	Authorisation
1.0	6 Sep 2021	Updated and submitted to UKAS	Edited: Created Reviewed: Elise Cray Authorised by: Kiren Sreekumar
2.0	21 Jan 2022	Updated based on UKAS review and response	Updated: Gyulserian Hyussein Reviewed and Authorised: Kiren Sreekumar
3.0	11 Feb 2022	Updated based on UKAS further review and response	Updated: Gyulserian Hyussein Reviewed and Authorised: Kiren Sreekumar