

BMM Testlabs

Product Certification Scheme

BMM Testlabs Certification Body (CB) offers Product Certification services to our clients in a non-discriminatory way whose products are covered by the scope of the Certification Body.

BMM CB has been established as a separate and independent department to provide certification services to BMMs existing and new clients for European markets. This department acts with impartiality and is guided by a Product Compliance Certification Committee for final certification decisions.

BMM provides a qualified independent and impartial review, certification and of products for the gaming industry in compliance with published standards or jurisdictional requirements. BMM CB will confine its certification activities to the agreed upon requirements in the client application.

The goal of this scheme is the assurance to the customer that their product meets all applicable standards to enable them to go to market within regulated gaming and jurisdictions upon successful completion of the product certification process.

Therefore, BMM will continuously deliver high quality certification services with competence, integrity and impartiality.

Continuous improvement of the product certification approach as well as related processes and technologies will also help to provide product certifications that are in compliance with current regulations and designed to respond to changing customer needs.

This scheme details

- Scope of certifications
- Competency requirements of Certification Body
- Certification application process
- Certification evaluation and decision process
- Appeals and Disputes

1. CERTIFICATION SCOPE

Certification work will be performed in accordance with ISO/IEC 17065: 2012 as applicable to the certification.

APPLICABLE STANDARDS AND NORMATIVE REFERENCES

The following are the applicable standards and normative documents BMM CB abides by;

- ISO 17065:2012 Conformity Assessment - Requirements for bodies certifying products, process

The following standards are the basis for product certification, along with product categories;

Slovenia	<ol style="list-style-type: none"> 1. Gaming Act (Official Gazette of the Republic of Slovenia n° 14/11, amended 108/12, 40/14) 2. Rules on technical standards for gaming devices designed for use in games of chance and the conformity assessment procedure (Official Gazette of the Republic of Slovenia, no. 59/08, 88/09, 37/11, 38/14, 32/15, and 67/20). Annex Electronic meters and pay-ins and pay-outs with tickets entered into force on the 28th of June 2008 3. Regulation– Information on the control of gaming machines (Official Gazette of the Republic of Slovenia n° 59/08, amended 88/09, 84/10, 37/11, 109/12, 93/14) 4. Regulation on Gaming via the Internet or Other Telecommunications Means (Official Gazette of the Republic of Slovenia, no. 42/08, 103/08 and 109/12)
Greece	<ol style="list-style-type: none"> 1. Law 4002/2011 regulating the gaming market and other provisions. 2. Decision N°79823/2020 (B 3264/2020 -05.8.2020) of Hellenic Gambling Commission entitled Technical Specifications for conducting Gambling through Video Lottery Terminals (VLT) 3. Decision N°79314/2020 (B 3263/2020 -05.8.2020) of Hellenic Gambling Commission entitled establishment of a Gaming Regulation for conducting Gambling through Video Lottery Terminals (VLT) 4. Decision No:79841_2020 - Gaming technical specification regulations for the organisation and running of online games of chance. 5. Decision No: 79835_2020 - Establishment of a Gaming Regulation for the organisation and running of games of chance through the internet
Netherlands	<ol style="list-style-type: none"> 1. Netherlands Gambling Authority Online Gambling Assessment Scheme - (Remote gambling conformity assessment scheme) V1.4. May 2021 2. Regulations of the Minister for Legal Protection of 21 January 2021, no.3181156

	3. Decree of 26 January 2021, containing provisions for the implementation of the Remote Games of Chance Act (Remote Games of Chance Decree) #37
Republika Sprska	<ol style="list-style-type: none"> 4. Official Gazette of the Republic Sprska Monday, 18th March 2019 Banja Luka Number 22 year, XXVIII, amendments 131/20 5. Rulebook on the organizing of games of chance on automatic machines – official gazette of the republika sprska number 50 6. Rulebook “ organization of electronic games of chance” official gazette of the republika Sprska Number 50 7. Ordinance on the organizing Online Games of Chance (Official Gazette of Republika Srpska, No. 45-2019 of 31 May 2019), as amended by the Amendments 64/19 and 104/19 8. The Law on Games of Chance (Official Gazette of Republika Srpska, No. 22-2019 of 18 March 2019). As amended by the Amendment 131/20
Sweden	1. LIFS 2018: 8 The Swedish Gambling Authority regulations and the general guidelines regarding the technical requirements and accreditation of bodies in charge of checking, testing and certifying gambling activities

Slot machines including the following subcomponents:

- A gaming machine platform; a platform includes hardware with different versions (e.g. different shapes of cabinets, monitors, pay-in / pay-out units, toppers, etc.)
- An operating system, which runs on the processor assembly and controls all machine parts, communication with players and connected systems, accounting and game base;
- Game software which includes the main game software, pay tables, reel layouts or card symbols, etc., or even the operating system of the gaming device. The certificate may be issued for a specific part of the software only, e.g. the data software with pay tables
- Gaming device components / assemblies, including the hardware upgrade, e.g. a bill acceptor or a standalone progressive.
- Gaming technology systems, including systems of linked progressives, supervisory information systems, systems of internet gaming, etc.

Online gaming system including the following subcomponents:

- Game software which includes responsible gaming, gaming logic, recording and traceability, terminals and sessions, communication channels, free gaming applications, graphic interface, behavior in the event of technical errors, automated gaming activity, miscellaneous functionalities, “live” gaming, internal control systems, fair play, information displayed to the player.
- Platform software which includes responsible gaming, player registration, user records and verification of prohibitions, gaming accounts, collection and payments, limits on

deposits, recording and traceability, terminal and sessions, communication channels, free gaming applications, internal control system, blacklist access.

- Internal Control System which collects and stores in a specific format the data requested by the applicable technical requirements.
- Integration including the behavior of the game or a specific component of the online gaming system under testing over the real environment.

Video lottery games including the following subcomponents:

- A gaming machine platform: a platform includes hardware with different versions (e.g., different shapes of cabinets, monitors, pay-in / pay-out units, toppers, etc.)
- An operating system, which runs on the processor assembly and controls all machine parts, communication with players and connected systems, accounting, and game base.
- Game software which includes the main game software, pay tables, reel layouts or card symbols, etc., or even the operating system of the gaming device. The certificate may be issued for a specific part of the software only, e.g., the data software with pay tables
- Gaming device components / assemblies, including the hardware upgrade, e.g., a bill acceptor or a standalone progressive.
- Gaming technology systems, including systems of linked progressives, supervisory information systems, systems of internet gaming, etc.
- Gaming machine server which includes statistical data, financial information

BMM CB will not develop or engage in any activity that may impede the impartiality, independence or objectivity required to provide product certification.

2. CERTIFICATION PROCESS

Evaluations of components being considered for 17065 certifications are conducted prior to application to the Certification Body. Evaluations must be completed by a 17025 accredited and the resulting compliance report is submitted as part of the certification application package.

2.1. Application for Product Certification

Every request for certification must be accompanied by acceptable submission documentation and must contain at minimum all the necessary information to complete the certification process in accordance with this product certification scheme.

At minimum, the submission documentation must include:

- Application for certification
- Signed (executed) Certification Agreement between BMM and the Client for the provision of product certification.
- Test Report from an ISO/IEC 17025 accredited laboratory identifying the product to be certified.
- Identification of applicable standards and/or normative documents for which the client is seeking certification.
- General features of the client including, name and address, contact details and contact personnel, physical location (if deemed necessary); significant aspects of its process or operations to be considered; and any legal obligations.
- General information about the client (if new to BMM), relevant to the field of certification for which the submission is being made including its relationship to a larger organization or corporation, if any.
- Information concerning all outsourced processes by the client that will affect conformity to requirements. If the client identified a legal entity/entity for producing the certified product that is different from the client, then BMM can establish appropriate contractual controls over the legal entity/entities concerned.

2.2. Application Review

Upon receipt of a certification submission package, the BMM Quality Department will complete an initial administrative review. The review will evaluate a prospective client's application for completeness and ensure that all requirements are mutually understood and agreed on.

An application may be rejected if it is incomplete i.e. missing documentation or signatures. An application may also be rejected if the client does not accommodate with requests for additional information relating to certification.

2.3. Technical Review

Following the initial review of the application or submission, an assessment is conducted by a Technical Reviewer to determine a product's conformity to the requirements of the product certification scheme and the applicable standard(s). The Technical Reviewer will review the product conformity at a minimum by confirming that the product has met the appropriate testing approval to the requested technical standards. The Technical Reviewer will also confirm that the standards the testing report has recommended are the latest in the market.

To be considered a Technical Reviewer, an individual must have an Advanced rating or higher in the applicable testing standards as recorded within the Skills Matrix.

The Technical Reviewer has the discretion to assign additional evaluation activities to qualified personnel. The progress of all work activities are recorded and monitored for accuracy and completeness. All evaluation tasks are performed internally by qualified and competent BMM personnel unless otherwise specified and communicated to the client of the necessity to outsource specified tasks, under the ISO 17025 accreditation. All evaluation activities, internal and/or outsourced, are performed according to the specific instructions of the client and within scope of BMM's accreditation to international or other standards.

BMM will inform the client of all nonconformities identified during the assessment. If one or more nonconformities have arisen, at the discretion of the client, BMM will either terminate further evaluation activities or will continue the evaluation process and provide information regarding the additional evaluation tasks needed to verify that all nonconformities have been corrected.

If the client agrees to the continuation of the additional evaluation tasks, BMM will again assess the additional evaluation tasks prior to continuing to complete the activities specified in the originating submission.

Upon completion of the assessment, the Technical Reviewer provides a report detailing the results of this technical review and a recommendation regarding the product certification to the Product Compliance Certification Committee (PCCC).

2.4. Certification Decision

A decision regarding granting or denial of the certification is made by a member of the Product Certification Committee (PCCC) based on the Technical Reviewers' report and recommendation.

All members of the Product Certification Committee act with impartiality and are regular employees with BMM. To mitigate any instance of conflict of interest, all parties involved in the certification decision attest to not being involved in testing activities of BMM Testlabs for the product under application. A Decision Maker must have an Advanced or Expert level of experience as recorded within the Skills Matrix.

The final determination for certification is confirmed by a PCCC member.

2.5. Certification Report Issuance

A comprehensive report detailing the decision of the PCCC is provided to the client. Information about the certified products and their certification status are made available via an online portal.

3. RECERTIFICATION

BMM Certifications will be valid for 5 years. After this period the product must be submitted for recertification. If the product changes in any way from the original certification, the updated product must also be submitted for recertification.

4. WITHDRAWAL OR SUSPENSION

A certification may be withdrawn or suspended for the following reasons or actions:

- At the request of the client.
- Failure to pay invoices related to the certification.
- Any change in the product originally certified without notification to BMM CB or if required a recertification may result in withdrawal or suspension.

In instances of Withdrawal or Suspension, BMM will remove the certification from the online registry and will require the client to immediately cease use of any reference or report to the certification status of the affected product.

5. CHANGES TO SCOPE OF CLARIFICATION

Changes to the scope of certification will result in the issuance of a new certificate which may require additional evaluation activities and certification decisions.

6. COMPLAINTS AND APPEALS

Complaints can be addressed to any employee of BMM CB and will be documented and managed centrally by the Quality Manager (QM). Upon receipt, the QM will send an acknowledgment of the complaint to the complainant. The QM will investigate the complaint, requesting assistance and input from the PCCC or any other BMM CB staff member as needed to assist in the management and resolution of the complaint. A response detailing the outcome of the complaint will be provided to the complainant within 30 working days.

An appeal may be made against any adverse decision taken by BMM CB . Adverse decisions may include:

- Refusal to accept an application.
- Refusal to proceed with an evaluation.
- Decisions to deny, suspend or withdraw certification.
- Any other action that impedes the attainment of certification.

A client may lodge an appeal by contacting BMM CB at BMMCertified@bmm.com. Once the appeal is received by BMM CB, it will be reviewed by the Appeals Committee. A determination of compliance or conformance regarding the details of the appeal will be made. A response will be issued within 30 days detailing the appeal decision and outlining further actions required.

If at this time the client disagrees with the appeal decision, they may take the matter up with the relevant regulatory agency or committee.

BMM CB endeavors to resolve any dispute relating to services, timeliness or billing directly with the client through direct communications with Executive management of BMM. Legal counsel will be included if needed. A review of all related personnel, documentation and records will be performed during this dispute. If the dispute cannot be resolved through these channels BMM will consider third party mediation and if needed third party arbitration.

All communications regarding the appeal or complaint must be documented in writing and are kept in the appropriate Appeals and Complaints file on the BMM CB Intranet site.

7. CONFIDENTIALITY AND PROTECTION OF INFORMATION AND DATA

Protecting confidential client and customer information is critical to the integrity and reputation of BMM CB as a credible and authoritative certification body and to maintain BMM's legal and corporate establishment.

All information and documentation obtained from or provided by companies during the certification process shall be treated as confidential and may not be disclosed to any third party without the client's written consent. Information about an organization which is already known to be available in the public arena may be disclosed without this written consent.

Unless authorized by the applicant in writing, details of applications for certification are also treated as confidential until the conclusion of the certification process. Where a Client is unsuccessful in its application for certification, this information is not made available by BMM.

All BMM staff (employees, independent contractors, advisory committee members, or consultants) shall maintain the confidentiality of the information referenced above. Confidentiality of such information is addressed in the agreements signed by independent contractors and consultants. Within BMM, confidential information should be discussed only with those who, according to their position description, have a role to play.

8. CHANGES AFFECTING CERTIFICATION

Clients will be notified if BMM CB makes any change to this scheme or certification requirements that affect the client. Verification of any technical modifications made to accommodate the changes to this scheme will be performed on receipt of new evaluation request. Clients will be notified within 45 days if any changes occur with the BMM CB 17065 accreditation status. Notification will include all relevant information regarding the status of certifications issued prior to the change of accreditation status.