

PRODUCT/PROCESS CERTIFICATION SCHEME

1 BMM TESTLABS CERTIFICATION BODY (BMM CB)

BMM Testlabs Certification Body (BMM CB) offers high quality certification services to clients whose products are covered by the scope of the BMM CB. Certification is performed in a non-discriminatory and impartial way, with competence and integrity. BMM CB will not develop or engage in any activity that may impede its impartiality, independence or objectivity required to provide certification.

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

BMM CB provides a qualified, independent and impartial certification of products and processes for the gaming industry, in compliance with published standards or jurisdictional requirements, as listed in section 3. BMM CB will confine its certification activities to the agreed upon requirements in the client application. Type 6 scheme for certification of services and processes and Type 1a scheme for certification of products, based on ISO/IEC 17067:2013 (ISO 17067), has been selected for certification of online gaming systems against the regulations listed in section 3 of this document.

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

Continuous improvement of the certification approach as well as related processes and technologies ensure certifications that comply with current regulations and are responsive to changing client needs.

2 CERTIFICATION SCOPE

2.1 Standards and normative references

Certification is performed in accordance with the following standards and normative documents, which BMM CB abides by:

- ISO/IEC 17065:2012 Conformity Assessment - Requirements for bodies certifying products, processes and services

2.2 Jurisdictional regulations

The following jurisdictional gaming regulations are the basis for product and process certification:

Slovenia	<ul style="list-style-type: none"> - Gaming Act (Official Gazette of the Republic of Slovenia n° 14/11, amended 108/12, 40/14) - 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 - Regulation on the Supervisory Information System of Gaming Device (Official Gazette of the Republic of Slovenia n° 59/08, 88/09, 84/10, 37/11, 109/12, 93/14, 97/21, 155/21 in 205/21) - 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	<ul style="list-style-type: none"> - Law 4002/2011 regulating the gaming market and other provisions - 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)

	<ul style="list-style-type: none"> - 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) - Decision N°79841/2020 - Gaming technical specification regulations for the organization and running of online games of chance - Decision N°79835/2020 - Establishment of a Gaming Regulation for the organization and running of games of chance through the internet
Republika Srpska	<ul style="list-style-type: none"> - Rulebook on the organizing of games of chance on automatic machines (Official Gazette of Republika Srpska No. 50/2019) - Rulebook on the organizing of electronic games of chance (Official Gazette of Republika Srpska No. 50/2019) - Ordinance on the organizing Online Games of Chance (Official Gazette of Republika Srpska, No. 45-2019 of 31 May 2019, as amended by Amendments 64/19 and 104/19) - The Law on Games of Chance (Official Gazette of Republika Srpska, No. 22/2019 of 18 March 2019, as amended by Amendment 131/20)
Sweden	<ul style="list-style-type: none"> - 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
*Denmark	<ul style="list-style-type: none"> - SCP.03.00.EN.2.0 - Information Security Management System - SCP.06.00.EN.2.0 - Change Management Programme - SCP.01.03.EN.2.0 - Testing Standards for Online Casino - SCP.01.01.EN.2.0 - Testing Standards for Online Betting - SCP.01.02.EN.2.0 - Testing Standards for Land-based Betting - SCP.02.01.EN.2.0 - Inspection Standards for Online Betting - SCP.02.02.EN.2.0 - Inspection Standards for Land-Based Betting - SCP.02.03.EN.2.0 - Inspection Standards for Online Casino

Note: the jurisdictions marked with “*” are not ISO/IEC 17065 accredited.

2.3 Product and process categories

The following product and process categories may be subject of certification.

Gaming 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.
- Random Number Generators / RNGs: hardware / physical (e.g. roulette wheels or noise diodes), or software (pseudo-RNG / pRNG), as well as the associated functionalities (e.g. seeding and reseeding, scaling, background cycling, etc.).

Online gaming systems 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 in a real environment, or in connection with other components.
- Any applicable or specific gaming systems hardware.
- Random Number Generators / RNGs: hardware / physical (e.g. live studios), or software (pseudo-RNG / pRNG), as well as the associated functionalities (e.g. seeding and reseeding, scaling, background cycling, etc.).

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 may include statistical data, financial information, RNG, etc. Random Number Generators / RNGs: hardware / physical (e.g. roulette wheels or noise diodes), or software (pseudo-RNG / pRNG), as well as the associated functionalities (e.g. seeding and reseeding, scaling, background cycling, etc.).

Processes including the following subcategories:

- Information Security Management Process: Client's framework of policies and procedures regulating the internal information security framework of the infrastructure, dedicated to the provision of the gambling product.
- Change Management Process: Client's framework of policies and procedures regulating the internal management of the changes applied to the certified gambling product or process in the period following the certification.
- Risk Assessment and Vulnerability Management Process: Client's framework of policies and procedures regulating the internal identification and management of risks related to the certified gambling products or processes.

3 CERTIFICATION PROCESS

3.1 Pre-certification evaluation

Evaluation of products or processes being considered for certification shall be conducted prior to certification initiation. Evaluation shall be completed according to one of the following scenarios:

Scenario 1: Evaluation performed by a third-party laboratory and submitted to BMM CB for certification:

- The third-party laboratory performing the evaluation shall be accredited according to one of the following standards, depending on the evaluation performed:
 - o ISO/IEC 17025
 - o ISO/IEC 17020
 - o ISO/IEC 17021-1 in accordance with the ISO/IEC 27006 scheme
- The evaluation shall be performed against any applicable jurisdictional regulations.
- The resulting compliance report shall be submitted as part of the certification application package.

Scenario 2: Evaluation performed by BMM CB.:

- The evaluation shall be performed by staff satisfying the minimum qualifications defined in BMM CB internal procedures and methodologies.
- The evaluation shall be performed against any applicable jurisdictional regulations. If that is not the case, this additional (jurisdictional) evaluation is to be performed by BMM Spain Testlabs s.l.u. prior to certification.

3.2 Application for certification

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

At minimum, the submission documentation must include:

- Application for certification. Can have different forms, such as a document signed individually for each certification case, or as defined in a general agreement with the client (SLA).
- Signed (executed) Certification Agreement between BMM and the client for the provision of certification. Can have different forms, such as individually signed document, or signed as part of the application form, or included as part of a general agreement with the client (SLA).
- In case of Scenario 1 certification (as defined in section 3.1): Test / evaluation report from an ISO/IEC 17025 or ISO/IEC 17020 or ISO17021-1 (in accordance with the ISO/IEC 27006 scheme) accredited laboratory identifying and adequately describing the product or process to be certified.
- In case of Scenario 2 certification (as defined in section 3.1): Product sample or process framework subject to certification, including all material and information necessary to perform the evaluation and related certification.
- Identification of applicable standards and/or normative documents or gaming jurisdiction for which the client is seeking certification.
- General information about the client including legal name and address, contact details and contact personnel, physical location (if deemed necessary); significant aspects of its processes or operations to be considered; any legal obligations.
- Information concerning all outsourced processes by the client that might affect conformity of the certified product / process. If the client identifies a separate legal entity, producing the certified product or implementing a process that is different from the client, then BMM can establish appropriate contractual controls over any such legal entities concerned.

3.3 Initial administrative application review

Upon receipt of a certification submission package, the BMM Quality Department completes an initial administrative review. The review evaluates prospective client's application for completeness and ensures that all requirements are mutually understood and agreed upon.

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

3.4 Technical / Security review

Following the initial review of the application or submission, an assessment is conducted by a Technical/Security Reviewer to determine a product or process conformity to the requirements of the certification scheme and the applicable standards or regulations. Technical Reviewer reviews the product or process conformity at a minimum by confirming that the product or process has met the appropriate evaluation approval to the requested technical standards or regulations. Technical Reviewer also confirms that the standards or regulations the evaluation report has recommended are the latest and current.

Technical Reviewer has the discretion to assign additional evaluation activities to qualified personnel. The progress of all work activities is 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/IEC 17025, ISO/IEC 17020 or ISO/IEC 17021-1 (according to the ISO/IEC 27006 scheme) accreditations, depending on the nature of the evaluation performed. 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 informs the client of all nonconformities identified during the assessment. If one or more nonconformities arise, at the discretion of the client, BMM will either terminate further evaluation and/or certification activities, or will continue the 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 his technical review and a recommendation regarding the product or process certification to the Product / Process Compliance Certification Committee (PCCC).

To be considered a Technical/ Security Reviewer, an individual must have an Advanced (or higher) rating in the applicable evaluation standards / regulations, as recorded within the Skills Matrix.

3.5 Certification decision

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

All members of the Product / Process Compliance 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 evaluation activities of BMM Testlabs or third-party laboratories for the product or process under certification. A PCCC 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, who signs the certificate.

3.6 Certificate issuance

Upon request, the certificate and information about the certified product or process and its certification status is made available via an online portal. Upon request, a comprehensive report detailing the decision of the PCCC is also provided to the client.

4 CERTIFICATE MAINTAINANCE AND VALIDITY

4.1 Validity period

Generally, BMM certificates for products, which can be uniquely identified and authenticated, are valid indefinitely. Certificates for processes, which may change over time, may have a limited validity period, such as 5 years. The validity period may also be specified by the individual gaming regulator / jurisdiction.

If and when the validity period ends, the product or process shall be submitted for recertification. If the product or process changes in any way from the original certification, the updated product or process shall also be submitted for recertification. If the technical standards or regulations change in any way from the original certification, the updated (latest / current) versions are applied for recertification, unless specifically requested differently.

4.2 Withdrawal or suspension

A certificate 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 or process originally certified without notification to BMM CB.
- Recertification may result in withdrawal or suspension.

In instances of withdrawal or suspension, BMM will remove the affected certification from the online registry and will require the client to immediately cease to use the affected certificate and any references to the certification status of the affected product or process.

4.3 Changes affecting certification

Scope change: Changes of the scope of certification may result in the issuance of a new certificate, which may require additional evaluation activities and certification decisions.

Scheme change: Clients will be notified if BMM CB makes any change to this certification scheme that affects the client. Verification of any modifications of the certified product or process, intended to accommodate the changes to this scheme, will be performed on receipt of a new evaluation request.

Accreditation status change: Clients will be notified within 45 days if any changes occur regarding the BMM CB ISO/IEC 17065 accreditation status. Notification will include all relevant information regarding the status of certificates issued prior to the change of accreditation status.

5 COMPLAINTS AND APPEALS

A client may lodge a complaint by contacting BMM CB at BMMCertified@bmm.com. Complaints 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.

BMM CB endeavors to resolve any complaint 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 the dispute. If the complaint cannot be resolved through these channels BMM will consider third party mediation and if needed third party arbitration.

An appeal may be made against any adverse decision taken by PCCC. 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.

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

6 CONFIDENTIALITY AND PROTECTION OF INFORMATION AND DATA

Protecting confidential client 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 area 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.

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 is disclosed only to those who, according to their position description, have a role to play in the relevant certification processes.