

# 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 the Product / Process Compliance Certification Committee (PCCC) 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 gaming systems against the regulations included in the ISO17065 accreditation scope.

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

For the list of gaming regulations at the basis for product and process certification, please refer to the official ISO17065 accreditation scope, available at the following link:

<https://www.enac.es/documents/7020/506acfb0-81b2-4335-993a-0f397b7f7a39>

### 2.3 Product and process categories

For the list of products and processes subject to certification, please refer to the official ISO17065 accreditation scope, available at the following link:

<https://www.enac.es/documents/7020/506acfb0-81b2-4335-993a-0f397b7f7a39>

### 3 CERTIFICATION CONDITIONS

Applicant for certification may be an operator, manufacturer or a distributor. The process may also be initiated by another BMM office or a third-party laboratory.

The applicant is obliged to enable the BMM CB personnel to carry out the certification process by providing all relevant and requested information about the submitted product / process.

In case of a positive outcome of certification, the applicant stated on the issued certificate becomes the holder of the certificate.

At all times, BMM CB remains the owner of the certificate of conformity, as it is in the capacity of a certification body and therefore responsible for certificate maintenance, updating, registry keeping, and in case of discovering any subsequent deficiencies also for withdrawal or suspension of the certificate.

### 4 EVALUATION / TESTING SCENARIOS

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

Scenario 1: Evaluation / testing not performed by BMM CB. Instead, an evaluation / test report is submitted to BMM CB as part of the certification application package. Note that this scenario applies even if one of BMM's own units (including BMM Spain test laboratory) performed the evaluation / testing and issued the report.

- Scenario 2: Evaluation / testing performed by BMM CB as part of the certification process. The evaluation / test report is never created in this case, only the certificate.

### 5 CERTIFICATION PROCESS

#### 5.1 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: As a minimum, test / evaluation report in accordance with section 4 (Evaluation / testing scenarios). Additionally, based on its judgement, the PCCC may subsequently require access to any and all other items related to evaluation / testing, such as the evaluation / testing project file, records, product documentation, and/or the product sample.
- In case of Scenario 2 (or when additional evaluation / testing is needed): Product sample or process framework subject to certification, including all material and information necessary to perform the evaluation / testing and the 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.

## 5.2 Initial administrative application review

Upon receipt of a certification submission package, BMM CB 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. Additional information or accessories may be required from the client, to complete the application.

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.

## 5.3 Evaluation / testing

In case of Scenario 1 (evaluation / testing not performed by BMM CB):

- The laboratory performing the evaluation / testing shall be accredited according to one of the following standards, depending on the evaluation / testing performed:
  - o ISO/IEC 17025
  - o ISO/IEC 17020
  - o ISO/IEC 17021-1 in accordance with the ISO/IEC 27006 scheme
- The evaluation / test report shall be accordingly accredited.
- The evaluation / testing shall be performed against any applicable jurisdictional regulations. If that is not the case, this additional (jurisdictional) evaluation is to be performed by BMM CB as part of the certification process.
- The evaluation / test report shall unambiguously identify the subject of certification:
  - o For product certification: In case of software, identification should be done through versions and digital signatures (hashes). In case of hardware, identification should be done through full model name(s) and identification number(s), as appearing on product identification plates.
  - o For process certification, the following is required:
    - framework of policies/procedures governing the submitted process,
    - access to any system/tool involved in the governing and execution of the submitted process,
    - information about the company infrastructure, both technical and organizational,
    - information about key roles within the company applicable to the submitted process,
    - any other applicable information, depending on the nature of the process.

In case of Scenario 2 (evaluation / testing performed by BMM CB):

- The evaluation / testing must be performed by staff satisfying the minimum qualifications defined in BMM CB's internal procedures and methodologies and by, where applicable, jurisdictional regulations.

## 5.4 Technical review

An assessment is conducted by a Technical Reviewer to determine a product or process conformity to the requirements of the certification scheme and the applicable standards or regulations. Technical Reviewers review the product or process conformity at a minimum by confirming that the product or process evaluation / testing has met the appropriate approval to the requested technical standards or regulations. Technical Reviewers also confirm that the evaluation / testing standards or regulations applied are the latest and current.

For Scenario 1: In case the evaluation / test report provides adequate information on evaluation results and evaluation procedures, BMM CB generally does not perform additional evaluations (except for non-obligatory evaluation by sampling). Otherwise, additional evaluations are performed by BMM CB to such extent that it is possible to establish the conformity of the product / process against the required regulations or standards. In any case however, the Technical Reviewer has the discretion to assign additional evaluation / testing activities to qualified personnel.

All evaluation tasks are performed internally by qualified and competent BMM CB 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 in agreement with the client and within the scope of BMM's accreditation to international or other standards.

BMM CB informs the client of all nonconformities identified during the assessment. If one or more non-conformities arise, at the discretion of the client, BMM CB 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 CB 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 PCCC.

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

## **5.5 Certification decision**

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

If the decision is not to grant certification, the client is notified and provided the reason(s) for denial.

All members of the PCCC 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.

## **5.6 Certificate issuance**

Certificate is issued to the client. 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.

# **6 CERTIFICATE MAINTAINANCE AND VALIDITY**

## **6.1 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.

## **6.2 Withdrawal or suspension**

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

- Due to subsequent findings about the certified product or process.
- 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 CB 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.

If a suspended certificate is subsequently reinstated (e.g., the client resolved the issue causing the suspension), the certificate status can be resumed.

### 6.3 Changes affecting certification

**Scope change:** Changes of the scope of certification in relation to the submitted product/process, 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.

### 6.4 Samples maintenance

Product samples submitted for certification are normally kept by BMM CB for as long as there are any jurisdictional requirements for potential post-certification investigations. Software samples (both source and executable code, where applicable) are kept along with the documentation for as long as it is necessary to maintain product evaluation records.

## 7 COMPLAINTS AND APPEALS

A client may lodge a complaint by contacting BMM CB at [BMMCertified@bmm.com](mailto: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, timelines 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](mailto: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 are documented in writing and are kept in the appropriate Appeals and Complaints file on the BMM Toolbox application.

## **8 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.

