

## **RGS EVALUATION TESTING REPORT**

Games

**Reference regulation:**  
Malta Online Gaming Regulation

**01/09/2023**

## INTRODUCTION

The findings reported in this summary are the results of a broader set of documents and testing activities results archived in QUINEL Ltd's facilities. It is intended that the requester declares that:

- Any Hardware provided or described for analysis and testing is configured identically to hardware in commercial use
- Game software/ function provided for the testing and code review is declared by the customer to have the same behaviour to the software/code in commercial use
- Functionality made by the software in automatic test mode has a realistic behaviour

and that

- all the files and modules,
- the database schemas and all the specific programming resources,
- all the parameters contained into any databases and/or configuration file

that have been subject to the audit process guarantee the same behaviour of what is going to be published/deployed according to this audit results.

The Recipient, by accepting and using this Report, declares to be aware and accept unconditionally all the terms and conditions set forth. If the Applicant and / or the Recipient does not agree on the terms and conditions set forth, QUINEL Ltd reserves the right to cancel the certification provided with this Report, it follows therefore that the Recipient must immediately return all copies to QUINEL Ltd of this Report and cannot use them nor refer to.

Any copy of this test report must also include the page number and total number of pages.

Copy of this test report must not be reproduced except in full, without written approval of the laboratory.

## A) Audit ID

MT\_RLG001GAM\_BATCH1\_REV.1

## B) Reference regulation

- Gaming Authorisations Regulations - Subsidiary Legislation 583.05 - L.N. 243 of 2018
- Directive 2 of 2018 - Player Protection Directive - V3 – January 2023

## C) Test methods

QISI001– Software source code inspection  
 QIVI001 – Visual inspection  
 QIMT001 – Mathematical Analysis  
 QIAF001 – Accounting functionalities

## D) Auditor / Test lab

**QUINEL Ltd**  
 M Space M3, Zone 3, Central Business District  
 Triq L-Ghajj tan – Nofs  
 Birkirkara CBD 3060 – Malta  
[info@quinel.com.mt](mailto:info@quinel.com.mt)

## E) Audit subject

**Description:** Compliance of the following test items (games):

| <i>Test Item</i> | <i>Item Name</i>         | <i>Revision</i> | <i>Interface</i>       |
|------------------|--------------------------|-----------------|------------------------|
| G001             | Roulette                 | 2.42.7          | HTML5 (Desktop&Mobile) |
| G002             | Automatic Roulette       | 2.42.7          | HTML5 (Desktop&Mobile) |
| G003             | Automatic Roulette 00    | 2.42.7          | HTML5 (Desktop&Mobile) |
| G004             | Triple Way Live Roulette | 2.42.7          | HTML5 (Desktop&Mobile) |
| G005             | La Partage Live Roulette | 2.42.7          | HTML5 (Desktop&Mobile) |
| G006             | Live Super 6             | 2.42.7          | HTML5 (Desktop&Mobile) |
| G007             | Live Baccarat            | 2.42.7          | HTML5 (Desktop&Mobile) |
| G008             | Live Dragon Bonus        | 2.42.7          | HTML5 (Desktop&Mobile) |
| G009             | Live Blackjack           | 2.42.7          | HTML5 (Desktop&Mobile) |

**Receipt date:**

11/07/2023 – first submission for testing against the regulation as per Section (B).

**Inspection date:**

26/07/2023 - 01/09/2023

## F) Requester

Religa Limited

QUINEL Ltd

M Space M3 – Zone 3, Central Business District – Triq L-Ghajj tan-Nofs – Birkirkara CBD 3060- Malta

[info@quinel.com.mt](mailto:info@quinel.com.mt)

Level -4, Portomaso Marina  
Portomaso PTM 4010, St Julian  
eportelli@religa.com rvella@religa.com

### G) Owner of the system/software

Refer to section F)

### H) Companies and organizations involved in the process

**Producer(s):** Ref. to Section G)

**Requester:** Ref. to Section F)

**Licensee/Operator:** N.A.

### I) Individuals involved in the process

**On the Requester side:** Edgar Portelli (CEO), Renzo Vella.

**On the Producer(s) / Integrator(s) side:** same as for Requester.

**On the Licensee/Operator side:** N.A.

### J) Processes, rules and parameters of the games

Evaluation of game rules was conducted to ensure that they satisfy the requirements as per the regulation in the Section (B). Refer to the Annex I for the full list of requirements satisfied.

Game / Test item type: **Refer to the table below**

Game(s) / Test item(s) use(s) Jackpot: **No**

Here follows the theoretical pay-out of the test items:

| Test Item | Game/Item Name           | Live Game | Game Type | Theor. RTP [%]                                                                                                           |
|-----------|--------------------------|-----------|-----------|--------------------------------------------------------------------------------------------------------------------------|
| G001      | Roulette                 | Yes       | Roulette  | 97.3%                                                                                                                    |
| G002      | Automatic Roulette       | Yes       | Roulette  | 97.3%                                                                                                                    |
| G003      | Automatic Roulette 00    | Yes       | Roulette  | 94.74%                                                                                                                   |
| G004      | Triple Way Live Roulette | Yes       | Roulette  | 97.30%                                                                                                                   |
| G005      | La Partage Live Roulette | Yes       | Roulette  | The Optimal Theoretical RTP for Red/Black, Even/Odd and 1-18/19-36 is 98.65%<br>The RTP for all the other bets is 97.30% |
| G006      | Live Super 6             | Yes       | Baccarat  | Banker - 98.54%<br>Player - 98.76%<br>Tie - 85.64%                                                                       |

| Test Item | Game/Item Name    | Live Game | Game Type | Theor. RTP [%]                                                                                                                             |
|-----------|-------------------|-----------|-----------|--------------------------------------------------------------------------------------------------------------------------------------------|
|           |                   |           |           | Player Pair - 89.64%<br>Banker Pair - 89.64%<br>Super6 - 86.18%                                                                            |
| G007      | Live Baccarat     | Yes       | Baccarat  | Banker - 98.94%<br>Player - 98.76%<br>Tie - 85.64%<br>Player Pair - 89.64%<br>Banker Pair - 89.64%                                         |
| G008      | Live Dragon Bonus | Yes       | Baccarat  | Banker - 98.94%<br>Player - 98.76%<br>Tie - 85.64%<br>Dragon Bonus Player - 97.35%<br>Dragon Bonus Banker - 90.63%                         |
| G009      | Live Blackjack    | Yes       | Blackjack | Blackjack 99.42% (*)<br>Perfect Pair 95.9%<br>21 +3 93.71%<br>Bet Behind 99.42%<br>(*) The RTP is calculated on the first hand of the deck |

## K) Protocols and specifications of the gaming system

The Requester provides an online live dealer gaming environment.

The game (server-side) is developed entirely with the Java language, and an HTML5 responsive graphic user interface is configured for both desktop and mobile environments. The game client does not own any game logic and only the specific data related to the player is sent over the communication channel.

The game server receives the live events and calculate the probabilities and the situation of each game played by the dealer. The server also receives the bets and calculate the outcome based on the live results. The Requester transmits the videos of the games directly to the players.

Games were provided through the following link for the player's interface: [Game link](#)

### Live Dealer Studio:

The Requester provides an online live dealer gaming environment. The videos of the games produced in the Requester's facilities are integrated into its web interface. Thereafter, the Requester transmits the videos directly to the players.

The Live Studios requirements are declared out of the scope as per customer's request.

## L) Security of the system

N.A.

## M)Critical modules

| <i>File name</i>                            | <i>SHA1</i>                              | <i>Critical</i> | <i>Test Item</i> |
|---------------------------------------------|------------------------------------------|-----------------|------------------|
| mathematic.js                               | 005dee06ae131641049d73eaa3ed658fea25e22  | Y               | G001             |
| mathematic.js                               | 005dee06ae131641049d73eaa3ed658fea25e22  | Y               | G002             |
| mathematic.js                               | 0ebe1032d4124577d4853032a5ad721efb7e958f | Y               | G003             |
| mathematic.js                               | 2105a020a8fb67f341b13cdcd9de5134cd98f06  | Y               | G004             |
| roulette-triple.player-round-logic.model.js | 4011388a4f493033347d9cdf09e5d1036fbbe009 | Y               | G004             |
| roulette-france.player-round-logic.model.js | f06806e39e1298543604a11a983f8f5f0a4c5c84 | Y               | G005             |
| mathematic.js                               | 779360c7b6232f5899f7c5220fb8d7991b6998c2 | Y               | G005             |
| mathematic.js                               | 05dd08901ba814d8a244b1a263fe83ef590ee6ea | Y               | G006             |
| baccarat.player-round-logic.model.js        | 8c34a0b78adf2826707001dab225e7af3acd61cc | Y               | G006             |
| mathematic.js                               | 326014317e5bcabafceeb9635e5c560021cdf61  | Y               | G007             |
| mathematic8.js                              | 3dbd5efceba2d800a4e30495209076165c18c39d | Y               | G007             |
| baccarat.player-round-logic.model.js        | 8c34a0b78adf2826707001dab225e7af3acd61cc | Y               | G007             |
| mathematic.js                               | 326014317e5bcabafceeb9635e5c560021cdf61  | Y               | G008             |
| mathematic10.js                             | df42893c4c197caa3bcf2861acfedd15828c54b2 | Y               | G008             |
| baccarat.player-round-logic.model.js        | 8c34a0b78adf2826707001dab225e7af3acd61cc | Y               | G008             |
| bj.math.js                                  | 62264071ad98beffcb1af57658f77888fc9e4253 | Y               | G009             |
| bj.player-round-logic.model.js              | 1fdb37e6396314c6d8550123d98c794c44f37eb9 | Y               | G009             |

## N) Evaluation performed

The test evaluation, required by the Requester, was completed against the applicable requirements of regulations as per section B).

Refer to the Annex I for the full list of requirements satisfied.

## O) Testing activities applied

Internal procedure followed: Rif. "IOP 02-02 TEST METHODS"

## P) Additional information

None

## Q) Setup and application/system architecture

QUINEL Ltd

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|                     |
|---------------------|
| Refer to Section K) |
|---------------------|

**R) Product Tested**

|                     |
|---------------------|
| Refer to Section M) |
|---------------------|

**S) Report revisions**

|      |
|------|
| N.A. |
|------|

**T) CERTIFICATION**

Date: 01/09/2023  
Requester: Religa Limited  
Level -4, Portomaso Marina  
Portomaso PTM 4010, St Julian

Total Number of Pages: 9

QUINEL Ltd certifies that the games / test items identified at section E) comply with the Malta Online Gaming Regulation as per section B).

Refer to the Annex I for the full list of requirements satisfied.

**U) CONDITIONS**

The scope of the activity is limited to game certification. The game must be operated from certified Live Studios.

**V) CONCLUSIONS**

The game / test item identified at section E) is compliant with the abovementioned technical standards.

Date: 01/09/2023

**Signed:**



Fabio Valenti – Laboratory Manager  
(QUINEL Ltd)



Isacco Ceci – CEO  
(QUINEL Ltd)



## ANNEX I – REQUIREMENTS SATISFIED

Unless differently specified, the results are related to all the test items.

### Directive 2 of 2018 - Player Protection Directive - V3 – January 2023

| Article                                        | Result                           | Comments                                                                                                 |
|------------------------------------------------|----------------------------------|----------------------------------------------------------------------------------------------------------|
| Part III – Terms and Conditions - 7.1.a        | PASS<br>(Limited to the game UI) | The game rules are available directly in the game's user interface and can be accessed without wagering. |
| Part III – Terms and Conditions - 7.2          | PASS<br>(Limited to the game UI) | The game rules are clear and accurately describe the behavior of the game.                               |
| Part IV – Responsible Gaming - 13C             | PASS<br>(Limited to the game UI) | In-game values are shown in monetary currency.                                                           |
| Part VI – Player Activity and Support - 18.4.a | PASS<br>(Limited to the game UI) | The player's balance is always available through the game's user interface.                              |
| Part VII – Return to Player - 22.1             | PASS                             | Theoretical RTP of the game is greater than 85% (refer to section J).                                    |

| ID | Description                                                                                                        |
|----|--------------------------------------------------------------------------------------------------------------------|
| 1  | The scope of the activity is limited to game certification. The game must be operated from certified Live Studios. |

| Hardware RNG Description       | Game Name                | Certificate Report (ID)              |
|--------------------------------|--------------------------|--------------------------------------|
| Single Zero Roulette           | Roulette                 | 2017CMM008RNG123                     |
| Single Zero Roulette           | Roulette                 | TCS10102_E                           |
| Automatic Single Zero Roulette | Automatic Roulette       | RN-123_CMM-18-01                     |
| Automatic Single Zero Roulette | Automatic Roulette       | T-J0057-I0016                        |
| Automatic Double Zero Roulette | Automatic Roulette 00    | RN-123_CMM-18-01                     |
| Stellar Wheel                  | Triple Way Live Roulette | RNG.GLI.JJG.1001.01.02–Stellar Wheel |
| SlingshotII                    | La Partage Live Roulette | RN-123-CMM-18-01                     |

**END OF  
COMPLIANCE  
REPORT**