

TEST REPORT AND RECOMMENDATION

Jurisdiction:	Malta
Authority:	Malta Gaming Authority (MGA)
Customer:	iMoon B.V. Dr. H. Fergusonweg 1 Willemstad, Curaçao
Manufacturer:	iMoon B.V.
Submission Reference:	Submission email dated 18 th December 2024
Evaluated Product(s):	Online game "HI LO"
Issued By:	BMM Testlabs
Location(s) of Evaluation:	BMM Macao Limited MPU-BMM testing Center for Gaming Devices, Macao Polytechnic University, Taipa Campus Research Building 2 ^o floor, room R2F-02 Avenida Padre Tomás Pereira,S.N.,Taipa, Macao, China
Project Number:	IMOON.1005
Report Number:	IMOON.1005.02.A
Date of Issue:	3 rd April 2025
Date(s) of Evaluation:	18 th December 2024 to 3 rd April 2025
Standards Tested:	Legal Notice 176 of 2004 of the Lotteries and other Games Act as amended by Legal Notice 110 of 2006, 270 and 426 pf 2007, 90 of 2011 and 131 of 2016 Directive 2 of 2018 V3 - Player Protection Directive (amended 12 th January 2023)
Compliance Certification:	I, Carmen Ho, Team Leader – Technical Services, hereby certify that the Online game "HI LO" complies with the relevant standard (except as identified below in section 5 "Non-Compliances") and is recommended for approval by the Authority for operation in "Malta".
Signed:	 Carmen Ho, Team Leader - Technical Services



The results reported herein have been performed in accordance with the laboratory's terms of accreditation under the Singapore Accreditation Council–Singapore Laboratory Accreditation Scheme.

bmm macao limited

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1. PURPOSE:

iMoon B.V. has requested BMM to evaluate the product listed in section 3 for operation in relevant below Malta market:

- Legal Notice 176 of 2004 of the Lotteries and other Games Act as amended by Legal Notice 110 of 2006, 270 and 426 pf 2007, 90 of 2011 and 131 of 2016
- Directive 2 of 2018 V3 - Player Protection Directive (amended 12th January 2023)

This report has been amended from the previously submitted report with Report ID "IMOON.1005.01.A" dated 27th March 2025 to remove the configuration parameter under section 5.

2. EVALUATION METHOD:

The evaluation was conducted using the BMM testing procedures designed to ensure compliance to the applicable technical standards and ISO/IEC 17025.

The full details of the tests are stored in the Quality Management System.

3. DEVICE IDENTIFICATION:

3.1. PLATFORM DESCRIPTION

Game testing only. The game was tested on iMoon Online Gaming Platform.

3.2. GAME DESCRIPTION

GAME NAME	GAME VERSION	CHANNELS							APPROVAL DATE
		DESKTOP	FLASH	HTML5 DESKTOP	HTML5 MOBILE	NATIVE IOS	NATIVE ANDROID	MINI VERSION	
HI LO	1.3.2	-	-	X	X	-	-	-	3 April 2025

HI LO

HI LO is a card game designed for quick gameplay. The goal is to predict whether the next card drawn will be higher, lower or equal to the current card. Note that the 'equal' option is only available when the current card is either an Ace or a 2.

This standard "higher or lower" game gets a strategic twist with special conditions for 2s and Aces. Wherein 2s are the lowest card, and Aces are the highest valued card.

Game Interface

- **Bet:** The player can place the bets directly from the bet panel by entering the desired Bet Amount. Adjust the bet more comfortably using the (1/2) and (2x) buttons for fine-tuned control.
- **Cash Out:** Players have the option to withdraw the initial bet before starting to guess the next card, giving the player a cashback equal to the original bet without continuing the round. If the player chooses not to withdraw the bet and proceed with the round, the Cash Out button remains available before each card is

drawn, giving the player the chance to secure the bet. The amount displayed on the button updates based on the bet amount multiplied by the odds of the previously drawn card.

- **Skip:** Player can choose to skip the next card drawn to generate a new one. There is no limit to how many times the player can skip.
- **History:** Track the bet status through the History modal, located on the left side of the screen. The player can also access it from the game menu.
- **Round ID:** This displays the total rounds players have played for this session.
- **Stake Limits:** This displays the minimum and maximum value the player can place on each bet.
- **Total Bet:** This displays the total bet amount the player placed in the most recent bet.
- **Balance:** This displays the available funds to play with.
- **Higher:** When the card is a 2, bet on Higher if the player thinks that the next card will be higher than a 2.
- **Higher or Equal:** Bet on Higher or Equal, if the player thinks that the next card will be higher than or the same as the current card.
- **Lower:** When the card is an Ace, bet on Lower if the player thinks that the next card will be lower than an Ace.
- **Lower or Equal:** Bet on Lower or Equal, if the player thinks the next card will be lower or the same as the current card.
- **Equal:** This is for 2s and Aces. Bet on Equal if the player thinks that the next card will be a 2 or an Ace again.
- **Card Drawn Result History:** The previously drawn cards and the action the player have taken on each card are displayed at the top of the main game screen for reference. This history will reset at the beginning of each round.
- **Previous Round Multipliers:** The result multiplier from the previous round is displayed at the top of the main game screen for reference.
- **Menu:** Represented by a Hamburger Menu Item, use this to open the Menu window to access the options for the game.
- **Time:** This displays the current time.

Additional Information

- **Win Odds Calculation:** Win odds are based on probability and aligned with the expected RTP. Lower probabilities result in higher odds and vice versa. All odds are adjusted according to the game's RTP, ensuring fairness and a balanced payout structure.
- **Example for HI (Up Arrow):** When guessing that the next card will be higher than the current card, if the current card is low, the probability of the next card being higher increases, resulting in lower odds.
- **Example for LO (Down Arrow):** When guessing that the next card will be lower than the current card, if the current card is high, the probability of the next card being lower increases, resulting in lower odds.
- **Wins and Balance Calculations:** Game does not round or truncate any amounts. All calculations are accurate up to the required decimals; Game just do not display extra decimals in games.
- **Malfunction:** In the event of a malfunction of the game, all affected game bets and payouts are voided and all affected bets will be refunded.
- **Disconnections:** In the event of internet disconnection while the round is ongoing, the game will automatically reward the player with the current multiplier reached. The correct winning amount will be added to player balance.

3.3. MATHEMATICAL EVALUATION

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM	
HI LO	95	94.15%	95.00%	94.15%	95.00%	94.15% - 95.00%
HI LO	98	97.31%	98.00%	97.31%	98.00%	97.31% – 98.00%

3.4. EVALUATED SOFTWARE

Product: HI LO				
File Name	Location	Function	Digital Signature Type	Digital Signature
/home/vsts/work/1/s/libs/game-services/hi-lo/helpers/get-last-hi-lo-card-info.helper.ts	Game Server	Game Logic	SHA1	480c75942037e88209ff00b3633281b58e23cca6
/home/vsts/work/1/s/libs/game-services/hi-lo/helpers/select-random-casino-card.helper.ts	Game Server	Game Logic	SHA1	b2806291a0bf7aa0198c10195be34dbda3fa22ff
/home/vsts/work/1/s/libs/game-services/hi-lo/hi-lo.service.ts	Game Server	Game Logic	SHA1	6468f53b388b1f5f05809ff71c8b3a1242459edc
/home/vsts/work/1/s/libs/helpers/resolve-bet.helper.ts	Game Server	Game Logic	SHA1	e7ec7c88e2f58bf306b2035d2f52d832dd40616f

4. BMM EVALUATION PERFORMED:

BMM has tested and confirmed compliance of the products specified in Section 3 against the appropriate applicable technical requirements for the Maltese Remote Gambling market. BMM performed the following tests to confirm compliance to the relevant regulatory specifications:

Player Protection Directive n. 2/2018	Results			
	OK	Fail	N/A	Observations
Part II				
Disclosure Requirements				
5.6) B2C licensees who market their services in one or more languages besides the English and, or Maltese language shall ensure that all the information required to be displayed by virtue of this Directive, is available	☐	☐	✓	N/A. Verified in English.

Player Protection Directive n. 2/2018	Results			
	OK	Fail	N/A	Observations
in that, or those, foreign languages, as well as the English and, or Maltese language.				
5.7) For the avoidance of doubt, any website operated by a B2C licensee, or on his or her behalf, and all the content on such website, shall, as a minimum, be available in the English and, or Maltese language.	☐	☐	✓	N/A. Game evaluation only.
Part III				
Terms and Conditions				
7.1.a) A B2C licensee shall make readily available to players the rules of the games which it is offering: (a) B2C licensees offering their gaming service online shall ensure that the game rules are made readily available to the player. Licensees shall ensure that the game rules are to be displayed in full no more than one (1) click away from the webpage in which the game can be played. With respect to games which are played after being downloaded and installed on a compatible device, licensees shall ensure that the game rules shall be made available to the player in any case prior to the player's first wager on the game; Provided that, for the avoidance of doubt, this paragraph shall be equally applicable to mobile sites and to mobile device applications. In such cases, the webpage or application interface containing the game rules may be further categorised into separate sections within the same webpage or application interface, possibly requiring further clicks to expand the sections due to limitation of space, provided that this shall in no manner prejudice the accessibility and understandability of the game rules.	✓	☐	☐	
7.1.b) B2C licensees offering their gaming service by remote means other than online shall make the game rules readily available and shall inform the player how these may be accessed, in any case prior to the player's first wager; and	☐	☐	✓	N/A. Online Game evaluation.
7.1.c) B2C licensees offering their gaming service in gaming premises and, or controlled gaming premises	☐	☐	✓	N/A. Online Game evaluation.

Player Protection Directive n. 2/2018	Results			
	OK	Fail	N/A	Observations
shall make readily available to players the rules of the games which are offered in those premises.				
7.2) The game rules shall be written in plain and intelligible language and shall include, inter alia, the various ways in which the player can win or lose and, without prejudice to Part VII of this Directive, the prize which the player is eligible to receive in case of a win in each case.	✓	☐	☐	
Part VI				
Player Activity and Support				
18A.4.a) The B2C licensees offering their gaming service online shall make the following information readily available and easily accessible to the player to whom it pertains: (a) the balance on the player's account, and the relevant currency, both of which shall also be visible at all times; Provided that where the game is displayed on a screen, the B2C licensee shall cause to be visible on the screen, at all times during a game, a live counter which automatically updates and shows the player's account balance in real time.	✓	☐	☐	
18A.4.b) The ability to access the player's gambling history of the immediately preceding six (6) months, including but not limited to, data relating to the player's total wins and losses, amounts of money deposited, and amounts withdrawn. Provided that all amounts displayed relating to wagers and winnings shall be quoted with the symbol of currency that the player is playing with. Provided further that the entire player's gambling history shall be accessible to the player upon request.	☐	☐	✓	N/A. Game evaluation only.
18A.4.c) the player support function concerning responsible gaming via online forms or personal contact, including but not limited to, live chat or telephone; and	☐	☐	✓	N/A. Game evaluation only.
18A.4.d) helplines or means to contact organisations that aid persons with problem gambling issues.	☐	☐	✓	N/A. Game evaluation only.

Player Protection Directive n. 2/2018	Results			
	OK	Fail	N/A	Observations
Provided that B2C licensees offering their gaming service by remote means other than online shall ensure that the players may avail themselves of the above information at any time, including by informing players upon registration that they can refer them to an organisation which aids persons who have gambling problems, should the players feel such need.				
18A.5 Without prejudice to anything contained in this Part, full screen games shall not be offered to players unless a real time clock is displayed on the screen at all times and players are given the facility to exit the game.	✓	☐	☐	
18A.6 B2C licensees shall keep a readily available copy of the player's gambling history.	☐	☐	✓	N/A. Game evaluation only.

L.N. 176/2004	Results			
	OK	Fail	N/A	Observations
Part VII - Registration of players				
Application for registration of players				
32.1 A licensee shall not permit a person to participate as a player in an authorised game conducted by the licensee unless that person is registered as a player and holds an account with the licensee.	☐	☐	✓	N/A. Game evaluation only.
32.2.a The licensee may register a person as a player only if the licensee has received from that person an application for registration	☐	☐	✓	N/A. Game evaluation only.
32.2.b The application shall at least include the following details:				
(i) that the player is over eighteen years of age	☐	☐	✓	N/A. Game evaluation only.
(ii) the player's identity	☐	☐	✓	N/A. Game evaluation only.
(iii) the player's place of residence	☐	☐	✓	N/A. Game evaluation only.

L.N. 176/2004	Results			
	OK	Fail	N/A	Observations
(iv) the player's valid e-mail address	☐	☐	✓	N/A. Game evaluation only.
32.2 Provided that if a licensee becomes aware that a person has provided false information in this respect, the licensee shall not register such person and where that person has already been registered, the licensee shall immediately cancel that person's registration as a player with the licensee.	☐	☐	✓	N/A. Game evaluation only.
32.3 No person under eighteen years of age may be registered as a player and any funds deposited or any money won by any such persons shall be forfeited to the Authority.	☐	☐	✓	N/A. Game evaluation only.
32.4 The licensee shall, at all times, keep a secure online list of all registered players.	☐	☐	✓	N/A. Game evaluation only.
32.5 Any one player can only register a single account with the licensee.	☐	☐	✓	N/A. Game evaluation only.

Part VIII - Player's Accounts and Payment of Winnings				
Players' account to be kept				
35.1 The licensee shall establish and maintain a player's account in relation to each player who is registered with the licensee.	☐	☐	✓	N/A. Game evaluation only.
35.2.a The licensee must credit to the account established under sub-regulation (1) in respect of a registered player all funds a) Received by the licensee from or on behalf of the player, or	☐	☐	✓	N/A. Game evaluation only.
b) owned by the licensee to the player.	☐	☐	✓	N/A. Game evaluation only.
35.3.a The licensee shall not accept a wager from a player unless:	☐	☐	✓	N/A. Game evaluation only.

L.N. 176/2004	Results			
	OK	Fail	N/A	Observations
(a) a player's account has been established in the name of the player and there are adequate funds in the account to cover the amount of the wager, or				
(b) the funds necessary to cover the amount of the wager are provided in an approved way.	☐	☐	✓	N/A. Game evaluation only.
35.4 The licensee shall not accept cash from a player and funds may be received from the player only by any of the following methods: -credit cards -debit cards -electronic transfer -wire transfer -cheques -any other method approved by the authority	☐	☐	✓	N/A. Game evaluation only.
35.5 A licensee shall not provide credit to a player or a player's account or act as agent for a credit provider to facilitate the provision of credit to a player or a player's account	☐	☐	✓	N/A. Game evaluation only.
Payment to players				
36.1 A licensee shall not make a payment in excess of two thousand and three hundred and twenty-nine euro and thirty-seven cents (€2,329.37) out of a player's account to a player until the player's identity, age and place of residence have been verified	☐	☐	✓	N/A. Game evaluation only.

Part IX - Financial Protection of Players				
Problem gaming warning				
42 A licensee shall display at all times, in a prominent place, on the entry screen of the website, a warning of the addiction possibilities of gaming and information	☐	☐	✓	N/A. Game evaluation only.

L.N. 176/2004	Results			
	OK	Fail	N/A	Observations
and links to other websites assisting compulsive gamblers.				
Limits set by Player				
43.1 A registered player may by written notice or electronic notice to the licensee:				
(a) set a limit on the amount the player may wager within a specified period of time(b) set a limit on the losses the player may incur within a specified period of time	☐	☐	✓	N/A. Game evaluation only.
(b) set a limit on the losses the player may incur within a specified period of time	☐	☐	✓	N/A. Game evaluation only.
(c) set a limit on the amount of time the player may play in any one session	☐	☐	✓	N/A. Game evaluation only.
d) exclude the player from playing for a definite or indefinite period of time.	☐	☐	✓	N/A. Game evaluation only.
43.2 A player who has set a limit or exclusion under this regulation may change or revoke the limit or exclusion by written notice or electronic notice given to the licensee.	☐	☐	✓	N/A. Game evaluation only.
43.3 A notice increasing or revoking a limit or decreasing the exclusion has effect only after seven days after the licensee has received the notice.	☐	☐	✓	N/A. Game evaluation only.
43.4 A notice reducing a limit or increasing the exclusion has effect immediately after it is received by the licensee	☐	☐	✓	N/A. Game evaluation only.
43.5 A licensee shall not accept a wager from a player contrary to a limit or exclusion set by the player under this regulation.	☐	☐	✓	N/A. Game evaluation only.
Display of counters				

L.N. 176/2004	Results			
	OK	Fail	N/A	Observations
44.1 Where the game is displayed on a screen the licensee shall cause to be displayed on the screen, at all times during the game, a counter which automatically updates and shows the player's account balance	✓	☐	☐	
44.2.a) The licensee shall also make available to every player an automatic reality check at intervals of one hour	☐	☐	✓	N/A. Game evaluation only.
44.2.b) The automatic reality check shall:				
(i) suspend play	☐	☐	✓	N/A. Game evaluation only.
(ii) clearly indicate for how long the player has been playing	☐	☐	✓	N/A. Game evaluation only.
(iii) display the player's winnings and losses during such period of time	☐	☐	✓	N/A. Game evaluation only.
(iv) require the player to confirm that the player has read the message	☐	☐	✓	N/A. Game evaluation only.
(v) give an option to the player to end the session or return to the game.	☐	☐	✓	N/A. Game evaluation only.
Indication of currency				
45) All amounts displayed relating to wagers and winnings shall be quoted with the symbol of currency that the player is playing with.	✓	☐	☐	

Player Protection Directive n. 2/2018	Results			
	OK	Fail	N/A	Observations
Part VII				
Return to Player				

Player Protection Directive n. 2/2018	Results			
	OK	Fail	N/A	Observations
22.1) A B2C licensee offering games online which use repetitively generated random selection for determining winning combinations to players, in accordance with the way in which the games offered thereby are designed, shall pay out on average a prize amounting to eighty five per centum (85%) or more of the money or money's worth wagered, or any such higher percentage as may be stipulated through a condition of the licence.	✓	☐	☐	
22.3) A B2C licensee shall ensure that its systems monitor the average percentage returned to the players as prizes for these games. Provided that B2C licensees whose games are hosted and managed by an approved B2B licensee, may have this obligation fulfilled by the said B2B licensee.	☐	☐	✓	N/A. Game evaluation only.

L.N. 176/2004 – Part X	Results			
	OK	Fail	N/A	Observations
Aborted and Miscarried Games				
Procedure to be followed when game aborts				
47.1) A licensee shall take all reasonable steps to ensure that the licensee's approved computer system enables a player whose participation in a game is, after he or she has made a wager, interrupted by a failure of the telecommunications system or a failure of the player's computer system that prevents the player from continuing the game, to resume, on the restoration of the system, his or her participation in the game that was interrupted as at the time immediately before the interruption.	✓	☐	☐	
47.2) If a licensee's computer does not enable a player to continue, after the restoration of the system, with a game interrupted by a failure of the telecommunications system or the player's computer system, the licensee shall				
(a) ensure that the game is terminated;	☐	☐	✓	N/A. The game will continue with default action.

L.N. 176/2004 – Part X	Results			
	OK	Fail	N/A	Observations
(b) refund the amount of the wager to the player by placing it in the player's account.	☐	☐	✓	N/A. The game will continue with default action.
Procedure to be followed when game miscarries				
48.1) If a game is started but miscarries because of a failure of the licensee's computer operating system, the licensee shall:				
48.1.a) (i) refund the amount wagered in the game to the player by crediting it to the player's account or, if the account no longer exists, by paying it to the player in an approved manner; and	☐	☐	✓	N/A. Game evaluation only.
48.1.a) (ii) if the player has an accrued credit at the time the game miscarries, credit to the player's account the monetary value of the credit or, if the account no longer exists, pay it to the player in an approved manner	☐	☐	✓	N/A. Game evaluation only.
Third Schedule - Regulation 25				
Technical Requirement for Gaming System				
1. The gaming system must:				
(a) faithfully follow the game rules published by the operator and	✓	☐	☐	
(b) provide over time no more than the expected house advantage to the operator.	✓	☐	☐	
2. Both the gaming and financial transactions must be congruent and secure.	☐	☐	✓	N/A. Game evaluation only.
3. The gaming system must satisfy the following criteria for randomness, following Schneier:				
(a) the data must be randomly generated, passing appropriate statistical tests of randomness	☐	☐	✓	N/A. the RNG is out of scope and was previously evaluated in the BMM Certification test report with reference RNG.MAL.IMOON.1004.01.01,

L.N. 176/2004 – Part X	Results			
	OK	Fail	N/A	Observations
				dated issued the 6 th September 2024.
(b) the data must be unpredictable, i.e. it must be computationally infeasible to predict what the next number will be, given complete knowledge of the algorithm or hardware generating the sequence, and all previously generated numbers	☐	☐	✓	N/A. the RNG is out of scope and was previously evaluated in the BMM Certification test report with reference RNG.MAL.IMOON.1004.01.01, dated issued the 6 th September 2024.
(c) the series cannot be reliably reproduced, i.e. if the sequence generator is activated again with the same input (as exactly as is reasonably possible) it will produce two completely unrelated random sequences.	☐	☐	✓	N/A. the RNG is out of scope and was previously evaluated in the BMM Certification test report with reference RNG.MAL.IMOON.1004.01.01, dated issued the 6 th September 2024.
4. The outcome of any game event, and the return to the player, must be independent of the CPU, memory, disk or other components used in the playing device used by the player	✓	☐	☐	
5. The game or any game event outcome must not be affected by the effective bandwidth, link utilization, bit error rate or other characteristic of the communication channel between the gaming system and the playing device used by the player.	✓	☐	☐	
6. The gaming system must be able to display for each game the following information on the current page or on a page directly accessible from the current page via a hyperlink:				
(a) the name of the game	✓	☐	☐	
(b) restrictions on play	✓	☐	☐	
(c) instructions on how to play, including a pay-table for all prizes and special features	✓	☐	☐	
(d) the player's current account balance	✓	☐	☐	
(e) unit and total bets permitted	✓	☐	☐	
(f) the rules of the game.	✓	☐	☐	

L.N. 176/2004 – Part X	Results			
	OK	Fail	N/A	Observations
(g) information relating to the average winnings paid out to players of the game over a period of time or a particular number of plays.	✓	☐	☐	

5. NON-COMPLIANCES:

NIL

6. CONDITIONS:

NIL

7. ADDITIONAL INFORMATION:

1. New technical standards are expected to be published. In the meantime, MGA confirmed that the previous standards are still valid and must be integrated with the 2018 directives.
2. The aforementioned evaluated game has been tested using the iMoon online gaming platform v2.0.0 as an auxiliary component for the game operation in the game provider environment.
3. The RNG is out of scope and was previously evaluated in the BMM Certification test Report with reference RNG.MAL.IMOON.1004.01.01 issued on dated 6th September 2024.
4. The game detailed within this report was tested against appropriate game requirements. This does not include integration testing against a platform provider.
5. BMM has tested the new online game “HI LO” on Microsoft Windows 10 - Google Chrome - 131.0.6778.33 (Official Build) (64-bit) with PC and mobile device (Android with Google Chrome Version 131.0.6778.135) were used in this evaluation.

8. TERMS AND CONDITIONS:

BMM Testlabs (“BMM”) has conducted a level of testing of the gaming product which has historically been adequate for a submission of this type. However, inherent in testing in a laboratory environment are the unavoidable limitations of not being able to verify the effects of all possible configurations and environments that occur in actual gaming venues.

This test report is for use by the client for the jurisdiction (“Jurisdiction”) referenced in the report (the “Report”) and only verifies, as of the date stated, the gaming product described in the Report subject to any conditions or limitations set forth therein.

The manufacturer named in the Report is solely responsible for possession of the appropriate license to sell, lease, service, or provide gaming supplies or gaming-related services in the Jurisdiction and for compliance with the ongoing requirements of the Jurisdiction. It is the responsibility of the manufacturer and operators to ensure that

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the gaming product detailed in this Report is installed, maintained and operated correctly without defects and safely in accordance with requirements of the Jurisdiction.

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The signatory certifies under penalty of perjury that the compliance testing of the gaming product detailed in this Report and any accompanying documents was conducted in accordance with the requirements of the Jurisdiction and that the gaming product meets the requirements of its laws and the regulations adopted thereunder, and all published technical standards, control standards, control procedures, policies, industry notices and similar requirements implemented or issued by the Jurisdiction (as stated in the report), to the best of BMM's knowledge and belief.

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9. ATTACHMENTS:

NIL

--- END OF REPORT ---