

This is a revised report of “RVS-MT-231122-01-GC-R1” issued on 22 November 2023. The RTP has been updated for the games Chubby Santa and Lucky Comanche in this report.

Certification Report RS Reevo Services Ltd Game Audit Report – 09 Games

Report Identification RVS-MT-231122-01-GC-R2

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Malta

Technical Standards used for testing Remote Gaming Regulations, 20 April 2005,  
Legal Notice 176 of 2004 of the Lotteries and other  
Games Act (ACT XXIV OF 2001) as amended by  
Legal Notices 110 of 2006, 270 and 426 of 2007, 90 of  
2011 and 131 of 2016.

**Gaming Associates**



## 1 Notations

### 1.1 Confidentiality

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This document, its themes, and ideas are strictly confidential and may not be used in any manner other than its expressed purpose, without the written permission of the author. The documents are for the intended client named in this report, also referred to as “the client” or “client”, and the applicable gaming jurisdiction mentioned in this document.

The documents are copyright.

### 1.2 Disclaimer

**ga** has reported on what was discovered throughout the assessment period of the client’s game(s) related to the technical scope of testing as per applicable jurisdictional requirements. Results are based on the client’s submission of information material, access to the testing environment and applicable testing is performed within a finite period.

Inherently there are limitations in performing compliance testing within a laboratory environment and accordingly **ga** has undertaken its best endeavours to ensure a thorough assessment is performed and a conclusion stated.



## 2 Administration

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### 2.2 Version

Version	Description	Date
V0.1	Initial draft - MFAR	2023-11-16
V0.2	Review and update - WKAS	2023-11-17
V0.3	QA - UVAS	2023-11-20
V1.0	Final Report to RS Reevo	2023-11-22
V1.1	Revised report to RS Reevo - The RTP has been updated for the games Chubby Santa and Lucky Comanche in this report.	2024-01-08

## 3 Executive Summary

### 3.1 Introduction

RS Reevo Services Ltd (RS Reevo) has requested Gaming Associates (ga) to test their game, 09 Games, against the compliance requirements of Malta.

ga has tested RS Reevo's game 09 Games against the Malta Gaming Authority (MGA) compliance requirements listed in Section 3.2 Scope of Testing. This report presents the results of testing performed by ga for the 09 Games game. Hashes of the game are listed in Annex A: SHA-1 Hashes.

### 3.2 Scope of Testing

The scope of testing is to verify compliance against the following requirements of the Gaming Regulations, 20 April 2005, Legal Notice 176 of 2004 of the Lotteries and other Games Act (ACT XXIV OF 2001) as amended by Legal Notices 110 of 2006, 270 and 426 of 2007, 90 of 2011 and 131 of 2016:

♣ Third Schedule Regulation 25: Technical requirement for gaming system.

This compliance evaluation does not include evaluation of the Random Number Generator (RNG).

### 3.3 Testing Limitations Due to the Test Environment

Since 09 Games has been tested in a test environment, the following MGA requirements could not be tested and need to be verified when the game is integrated with a gaming platform:

- ♣ 2. Both the gaming and financial transactions must be congruent and secure.
- ♣ 6 (b) - 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:-  
(b) restrictions on play;
- ♣ 7. All financial reports produced by the gaming system must be congruent with gaming transaction reports and conversely: Provided that all such reports shall be readily and freely available to the Authority.
- ♣ 8. The gaming system must:- (a) be capable of producing monthly auditable and aggregate financial statements of gaming transactions, and (b) calculate accurately all taxation and other monies due to the Authority.
- ♣ 10. The gaming system must maintain information about significant events as follows:-
  - (a) large wins;
  - (b) transfers of funds in excess of such amount as the Authority may from time to time direct by notice in writing to the operator;
  - (c) changes made by the operator to game parameters.

### 3.4 Conclusions and Recommendations

RS Reevo's game 09 Games complies with the requirements of the Remote Gaming Regulations, 20 April 2005. However, some requirements, identified in Section 3.3 of this report, need to be verified when the game is integrated with a gaming platform.

ga recommends RS Reevo's game 09 Games to be approved for integration with gaming platforms already approved by the MGA.

## 4 Test Results

This section summarises the results of the tests performed on RS Reevo's game 09 Games. The tables in the following sub-sections provide the compliance status of the game against MGA requirements listed in [1]. Different values used in the "System Compliance" column are described as follows:

**Compliant:** The game complies with the requirement.

**Does Not Comply:** The game does not comply with the requirement.

**Acknowledged:** The requirement is only a statement or information.

**N/A:** The requirement is not applicable to the game.

**Out of scope:** The requirement cannot be evaluated at this stage due to the current scope of testing or limitation of the test environment.

### 4.1 Third Schedule Regulation 25: Technical Requirement for Gaming System

Malta Requirements	System Compliance	GA Comments
<b>Third Schedule</b>		
<b>Regulation 25: Technical requirement for gaming system</b>		
1. The gaming system must:		
(a) faithfully follow the game rules published by the operator; and	Compliant	The game instructions are available, and the game operates and interacts with the players in accordance with the game instructions.
(b) Provide over time no more than the expected house advantage to the operator.	Compliant	The game instructions are available, and the game operates and interacts with the players in accordance with the game instructions.
2. Both the gaming and financial transactions must be congruent and secure.	Out of Scope	The scope of the evaluation is limited to the game design, gameplay, and fairness. Evaluation of financial transactions is out of scope.
3. The gaming system must satisfy the following criteria for randomness, following Schneier:-	Compliant	<b>Refer to RNG Report:</b> RVS-MT-230203-01-RC-R1 RS Reevo Services Ltd RNG Evaluation Report.pdf
(a) the data must be randomly generated, passing appropriate statistical tests of randomness;		
(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;		
(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.		
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.	Compliant	The outcomes of the game are independent of the computer or device used by the player.
5. The game or any game event outcome must not be affected by the effective bandwidth, link utilisation, bit error rate or other characteristic of the communication channel between the gaming system and the playing device used by the player.	Compliant	The outcomes of the game are not affected by the bandwidth, link utilization, bit error rate, etc.
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:-	Compliant	
(a) the name of the game;	Compliant	The name of the game is displayed on the betting page.
(b) restrictions on play;	Compliant	
(c) instructions on how to play, including a pay-table for all prizes and special features;	Compliant	Instructions on how to play, including a pay table for all prizes and special features, are provided.
(d) the player's current account balance;	Compliant	The player's current account balance is displayed.

Malta Requirements	System Compliance	GA Comments
(e) unit and total bets permitted;	Compliant	The unit bet and total bets are displayed on the betting page.
(f) The rules of the game.	Compliant	The rules of the game are accessible from the game.
7. All financial reports produced by the gaming system must be congruent with gaming transaction reports and conversely: Provided that all such reports shall be readily and freely available to the Authority.	Out of Scope	The scope of the evaluation is limited to the game design, gameplay, and fairness. Evaluation of game management / operational procedures and controls is out of scope.
8. The gaming system must:-		
(a) be capable of producing monthly auditable and aggregate financial statements of gaming transactions, and	Out of Scope	The scope of evaluation is limited to the game design, game play, and fairness. Evaluation of financial statements is out of scope.
(b) Calculate accurately all taxation and other monies due to the Authority.	Out of Scope	The scope of the evaluation is limited to game design, gameplay, and fairness. Evaluation of financial statements is out of scope.
9. The gaming system must maintain information about all games played, including:-	Acknowledged	
(a) the identity of the player;	Compliant	
(b) the time the game began as recorded on the games server;	Compliant	The start time is provided to the player.
(c) the balance on the player's account at the start of the game;	Compliant	
(d) the stakes placed in the game (time stamped by the games server);	Compliant	
(e) The game status (in progress, complete, etc.);	Compliant	The game status is provided.
(f) the result of the game (time stamped by the games server);	Compliant	The timestamp is provided to the player.
(g) the time the game ended as recorded by the games server;	Compliant	The end time is provided to the player.
(h) the amount won or lost by the player; and	Compliant	
(i) The balance on the player's account at the end of the game.	Compliant	The ending balance is available.
10. The gaming system must maintain information about significant events as follows:-	Out of Scope	The scope of the evaluation is limited to the game design, gameplay, and fairness. Evaluation of game management / operational procedures and controls is out of scope.
(a) large wins;		
(b) transfers of funds in excess of such amount as the Authority may from time to time direct by notice in writing to the operator;		
(c) Changes made by the operator to game parameters.		
11. Any variations to any of the requirements specified in this Schedule shall be submitted to the Authority for its approval by notice in writing.	Acknowledged	

## 4.2 Return to Player

The statistical return to player (RTP) for RS Reevo's game 09 Games are:

No:	Game Name	Game Version	Return to Player (RTP%)
1.	Crown Heist	1.3.5	95.33%
2.	Dracula's Bloody Reels	1.1.0	95.44%
3.	Altar de Muertos	1.0.9	95.36%
4.	Wild Leprechaun	1.6.2	95.33%
5.	Miceketeers: The Cheese Guardian	1.3.10	95.50%
6	Joker's Super Wins	1.6.10	95.67%
7	Chubby Santa	0.6.21	95.36%
8	Naughty Cupid	1.0.0	95.33%
9	Lucky Comanche	1.1.7	95.50%



## 5 References

1. *Remote Gaming Regulations 2004, Legal Notice 176 of 2004 of the Lotteries and other Games Act (ACT XXIV OF 2001), 20 April 2005, as amended by Legal Notices 110 of 2006, 270 and 426 of 2007, 90 of 2011 and 131 of 2016.*
2. *RNG Certificate “RVS-MT-230203-01-RC-R1 RS Reevo Services Ltd RNG Evaluation Report.pdf”, version 1.0, dated 2023-02-03.*
3. *Game Description “EN - Naughty Cupid - GameRules&PayTable.pdf”, no version, no date.*
4. *Game Description “Naughty Cupid - Game Info.pdf”, no date.*
5. *Game Description “Altar de Muertos Game Sheet.pdf”, no date.*
6. *Game Description “Crown Heist Game Sheet.pdf”, no date*
7. *Game Description “Draculas' Bloody Reels Game Sheet.pdf”, no date*
8. *Game Description “EN - Crown Heist - GameRules&PayTable.pdf”, no date*
9. *Game Description “EN - Altar de Muertos - GameRules&PayTable.pdf”, no date*
10. *Game Description “EN - Micekeeters The Cheese Guardian.pdf”, no date*
11. *Game Description “EN - Wild Leprechaun - GameRules&PayTable.pdf”, no date*
12. *Game Description “EN Dracula's Bloody Reels - GameRules&PayTable \_.pdf”, no date*
13. *Game Description “Miceketeers The Cheese Guardian Game Sheet.pdf”, no date*
14. *Game Description “Wild Leprechaun Game Sheet.pdf”, no date*
15. *Game Description “EN - Lucky Comanche - GameRules&PayTable.pdf”, no date*
16. *Game Description “Lucky Comanche - Game Info.pdf”, no date*
17. *Game Description “Chubby Santa Game Sheet.pdf”, no date*
18. *Game Description “EN - Chubby Santa - GameRules&PayTable.pdf”, no date*
19. *Game Description “EN - Joker's Super Wins - GameRules&PayTable.pdf”, no date*
20. *Game Description “Joker's Super Win Game Sheet.pdf”, no date*
21. *Game Description “Reevo General Rules\_Slots.pdf”, no date*
22. *Game Description “ChubbySanta\_en.docx”, no date*



## Annex A : SHA-1 Hashes

The following hashes of critical components for the product tested are recorded.

Name	Critical File Name	SHA-1 hashes
Crown Heist	sugarfruitfrenzy_96.js	c2e4798dfbb87a882ca78343b0eaa86039a5c310
Dracula's Bloody Reels	snowking_96.js	d33adff2a08c30655b3078ba7ed78d25b8b9e7c2
Altar de Muertos	wolfwild_96.js	f3beb49bd27bbda4c1fcf995b3eb63309ac08712
Wild Leprechaun	wildleprechaun_96.js	29203a3bd7e790ce640da06319d02d33d64d3660
Miceketeers: The Cheese Guardian	miceketeersthecheeseguardian_96.js	13ecb69adeb42e7aaaf0e33c9bfaa145dfdea725
Joker's Super Wins	jokerssuperwins_96.js	2b2068a01038a85185b37e6c5f7affbfe9d9043
Chubby Santa	wolfwild_96.js	f3beb49bd27bbda4c1fcf995b3eb63309ac08712
Naughty Cupid	wildleprechaun_96.js	29203a3bd7e790ce640da06319d02d33d64d3660
Lucky Comanche	crazycrocs_96.js	f695ea916b71ae747fa2ae4254407b4fc4e9529b
RNG	engine.js	e4d91311dfbf0be5767d3e1852937f67dc618caf
	rng.js	cf7630b8871c57663a27c312f8117b419114fad

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