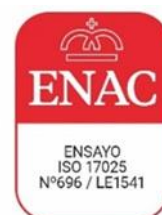


Evaluation Report for CT INTERACTIVE EOOD Hot Luck Jackpot v1.5

Manufacturer:	CT INTERACTIVE EOOD
ATF Report Number:	GRE.CATE-OL.1009.02.01
Document Number:	01
Date:	3 October 2024
Number of Pages:	14

BMM Spain Testlabs s.l.u.

The content of this document is strictly confidential. It has been prepared by BMM Spain Testlabs s.l.u. (BMM) exclusively for the perusal of CT INTERACTIVE EOOD and The Hellenic Gaming Commission and may not be disclosed to any other party without the prior written approval of CT INTERACTIVE EOOD.



GENERAL INFORMATION

Client name & Address:	CT INTERACTIVE EOOD 7 Kukush str. 1345 Sofia, Bulgaria
Client Reference Number:	Submission request letter dated 21 st May 2024
Testing dates:	Start date: 10 th June 2024 End date: 01 st October 2024
Product / Game Description:	Hot Luck Jackpot v1.5
Test Category:	Category 0
Jurisdictions Recommended:	Greece
Technical Standard used for Evaluation:	- Decision of the Minister of Finance number 67663 EΞ 2022/20.05.2022 (B '2483), which amended the Decision of the Minister of Finance number 79835 EΞ 2020/24.7.2020 entitled Adoption of Gaming Regulation on the Organization and Operation of online games of chance (B '3265, error corrections B 4441/2020) - Decision of the Minister of Finance number No.58876 EΞ 2022/06.05.2022 which amended the Decision of the Minister of Finance number 79841 EΞ 2020 (B' 3266) entitled "Adoption of Regulation on the Technical Specification (TEP) for the Organization and Operation of online games of chance" published on 05/08/2020
Location where test was performed:	BMM Spain Testlabs, s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés - Barcelona (España)
Location where report was issued:	BMM Spain Testlabs, s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés - Barcelona (España)
Conclusion:	Pass
BMM Reference Number:	CATE-OL.1009
Method/Procedures used:	EURSAM-SPA-MO-04 v6.0
Consultant(s):	M.Hesam Khosravi, Jasbir Kumar

1. SCOPE OF EVALUATION.

CT INTERACTIVE EOOD requested BMM Spain Testlabs s.l.u., hereinafter referred to as BMM, to evaluate the products listed in section 2 for operation in the Greek Remote Gambling Market, accordingly with the Standards/ Regulations described below:

- Decision of the Minister of Finance number 67663 EΞ 2022/20.05.2022 (B '2483), which amended the Decision of the Minister of Finance number 79835 EΞ 2020/24.7.2020 entitled Adoption of Gaming Regulation on the Organization and Operation of online games of chance (B '3265, error corrections B 4441/2020)
- Decision of the Minister of Finance number No.58876 EΞ 2022/06.05.2022 which amended the Decision of the Minister of Finance number 79841 EΞ 2020 (B' 3266) entitled "Adoption of Regulation on the Technical Specification (TEP) for the Organization and Operation of online games of chance" published on 05/08/2020

2. EVALUATION CHARACTERISTICS.

2.1. PLATFORM DESCRIPTION.

N/A, only jackpot evaluation.

2.2. JACKPOT SOFTWARE EVALUATION.

HOT LUCK JACKPOT

"HOT LUCK" is an interactive mystery jackpot with three (3) levels (Minor, Major and Mega) with a bonus screen and an additional scatter level: FEVER Bonus.

INTERACTIVE MODE

When a player activates the mystery bonus, he enters a bonus screen and plays for one of the mystery jackpot levels. The bonus screen is composed of 30 plates that the player can choose. Each plate can contain a symbol, corresponding to one of the jackpot levels, that when is selected, is attached to the corresponding jackpot level in the upper part of the game screen.

After collecting four (4) plates with the same symbol, the player is awarded the corresponding jackpot level and the bonus screen closes. The time for selecting the plates is limited by a timeout. If the player exceeds that time, the interactive mode is automatically completed, and the player is awarded the jackpot amount resulting from the bonus.

SCATTER MODE

Scatter Wins are activated when reaching one of the three (3) mystery jackpot levels. The total amount of bonus scatter is equal to the current value of the Lead level of the jackpot (FEVER bonus). The duration and the bonus win amount in scatter mode depends on the scatter settings and from the number of active players. This mode ends when all the Wins are paid.

"HOT LUCK" THERMOMETER

With each bet, the HOT LUCK scale rises until it reaches the top or one of mystery jackpot levels — Minor, Major or Mega — is hit. Then the scatter mode becomes 'ACTIVE', and scatter winnings are distributed between other active players. When the whole amount of the scatter bonus is paid, the sign 'ACTIVE' disappears, and the scale goes back down.

NOTE: "HOT LUCK JACKPOT" is applicable for all the games above.

2.2.1 MATHEMATICAL EVALUATION.

JACKPOT/S NAME	BMM CALCULATED RTP		CLIENT CALCULATED RTP	
	% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM
Minor	0,23%	1,16%	0,23%	1,23%
Major	0,16%	0,21%	0,16%	0,21%
Mega	0,30%	0,30%	0,30%	0,31%

Note¹: Hit Rate value for the Minor, Major and Mega jackpot are respectively 16,000, 320,000 and 2,100,000.

Note²: Seed values for the Minor, Major and Mega jackpot are respectively 20, 200 and 2,000.

Note³: the RTP Contributions for the Minor, Major and Mega jackpot are respectively 0.10%, 0.10% and 0.20%.

Note⁴: when a player hits the mystery bonus (randomly), he/she enters a bonus screen and plays for one of the three mystery jackpot levels that are won through a selection's bonus. Scatter winnings are kind of promotional bonus, which is triggered by hitting of any of the three Mystery jackpot levels. This jackpot evaluation has been taken from the original project CATE.1024. The base values and bet contributions are subject to the jackpot settings. It will be responsibility of the game provider / operator to set the proper value based on the live configuration.

2.3 EVALUATED SOFTWARE.

Product: HOT LUCK JACKPOT					
File Name	Version	Location	Function	Digital Signature Type	Digital Signature
cmsjpot_s_exe	1.5	Server	Game Logic	SHA1	CD39629D32AC7092D9636CF20CA962647CA1CFFA
JPIO.pm	1.5	Server	Game Logic	SHA1	4FCD4400BF50D8527873AEDE7B01A0F0A2C14F04

3. BMM EVALUATION PERFORMED.

BMM has tested and confirmed compliance of the products specified in Section 2 against the appropriate applicable technical requirements for the Greek Remote Gambling market. BMM performed the following tests to confirm compliance to the relevant regulatory specifications:

GREECE REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	NOTES
	EXTERNAL REF #			
DECISION OF THE MINISTER OF FINANCE NUMBER 67663 EE 2022/20.05.2022 (B '2483)				
ARTICLE 13 JACKPOT MODE				
13.1. A Jackpot may be run under a valid Type 2 Licence.	☐	☐	☒	N/A, this requirement is info only.
	13.1			
13.2. A Jackpot may only be used within the territory of Greece and only on games from the same manufacturer.	☐	☐	☒	N/A, only Jackpot standalone evaluation.
	13.2			

GREECE REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	NOTES
	EXTERNAL REF #			
DECISION OF THE MINISTER OF FINANCE NUMBER 67663 EE 2022/20.05.2022 (B '2483)				
ARTICLE 13 JACKPOT MODE				
13.3. It is not permitted for two or more Licence Holders to jointly run a Jackpot.	☒	☐	☐	
	13.3			
13.4. Before installing or transferring or modifying or abolishing a Jackpot, the CIS must provide a report of the configuration settings for that Jackpot for each specific period requested in accordance with the Technical Specifications.	☒	☐	☐	
	13.4			
13.5. For any amount paid out in the Jackpot, the CIS must provide a report on the amounts paid out in that Jackpot for each specific period requested, in accordance with the Technical Specifications.	☒	☐	☐	
	13.5			
13.6. The Licence Holder shall ensure that the maximum limit on the prize which can be paid out in the Jackpot does not exceed EUR 500 000. Any amount over that limit which has been collected based on the Players' wagers shall necessarily be transferred to another Jackpot.	☒	☐	☐	
	13.6			
13.7. Where the amount collected based on the Players' wagers or abolition of the Jackpot, the amount of the reduction or the amount collected based on the Players' wagers at the time of abolition shall necessarily be transferred to another Jackpot within three days of the date of the reduction or abolition.	☐	☐	☒	N/A, only B2B Jackpot standalone evaluation.
	13.7			

GREECE REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	EXTERNAL REF #
	Decision of the Minister of Finance number No.58876 EE 2022/06.05.2022			
Article 16 - REPORTING				
16.5 Progressive Jackpot Configuration Report	16.5			
The CIS must be able to produce a Progressive Jackpot Configuration Report (or report with a similar name) for each such function on the website, during the specific reporting period. The report must contain the following information:	☒	☐	☐	See below:
	16.5			
a) the unique ID and commercial name of the progressive function;	☒	☐	☐	
	16.5.a			
b) the date and time when the progressive pool took effect;	☒	☐	☐	
	16.5.b			
c) the contribution parameters (amount per day, percentage of minimum participation/pot, etc.) for all primary or secondary functions, including any diversion of amounts;	☒	☐	☐	
	16.5.c			
d) the unique ID for the payable for each participating game;	☒	☐	☐	
	16.5.d			
e) the amount required to participate in a progressive jackpot;	☒	☐	☐	
	16.5.e			
f) the total amount of winnings which have been paid out per progressive jackpot;	☒	☐	☐	
	16.5.f			
g) the total jackpot contributions made;	☒	☐	☐	
	16.5.g			
h) the Jackpot startup or other seeds not financed by contributions;	☒	☐	☐	
	16.5.h			
i) the current amount of the jackpot for each progressive pool;	☒	☐	☐	
	16.5.i			
j) the current value of jackpot contributions diverted (for other purposes);	☐	☐	☒	N/A, no diversion of the jackpot contributions is under evaluation.
	16.5.j			
k) the date and time the jackpot was retired;	☒	☐	☐	

GREECE REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	
	EXTERNAL REF #			
Decision of the Minister of Finance number No.58876 EE 2022/06.05.2022				
	16.5.k			
l) the amount transferred;	☒	☐	☐	
	16.5.l			
m) the date and time the jackpot was transferred, if applicable;	☒	☐	☐	
	16.5.m			
n) the progressive jackpot limit (amount), if applicable;	☐	☐	☒	N/A, the progressive jackpot limits to be set from operator side, to be tested during integration.
	16.5.n			
o) the amount over the limit, if applicable.	☐	☐	☒	N/A, the progressive jackpot over limits to be set from operator side, to be tested during integration.
	16.5.o			
16.6 Progressive Jackpot Won Report	16.6			
The CIS must be able to produce a Progressive Jackpot Won Report (or report with a similar name) for each progressive function on the website, during the specific reporting period. The report must contain the following information:	☒	☐	☐	
	16.6			
a) the unique ID and commercial name of the progressive function;	☒	☐	☐	
	16.6.a			
b) the unique ID for the game's payable;	☒	☐	☐	
	16.6.b			
c) the unique Player Session ID;	☒	☐	☐	
	16.6.c			
d) the unique Player ID;	☒	☐	☐	
	16.6.d			
e) the game cycle ID;	☒	☐	☐	
	16.6.e			
f) the date and time the progressive jackpot was paid out;	☒	☐	☐	
	16.6.f			

GREECE REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	
	EXTERNAL REF #			
Decision of the Minister of Finance number No.58876 EE 2022/06.05.2022				
g) the progressive jackpot level hit;	☒	☐	☐	
	16.6.g			
h) the amount of Progressive Jackpot paid out;	☒	☐	☐	
	16.6.h			
i) the user ID and name of the employee who processed the win, if required;	☐	☐	☒	N/A, this is not under scope of this evaluation.
	16.6.i			
j) the user ID and name of the supervisor who confirmed the win, if required.	☐	☐	☒	N/A, this is not under scope of this evaluation.
	16.6.j			
Progressive Jackpot				
Article 26 PROGRESSIVE JACKPOT REQUIREMENTS				
26.1 Introduction	26.1			
The Progressive Jackpot is a progressively increasing prize based on the credit units added/won. This includes prizes awarded on the basis of criteria other than winning a Game, such as the Mystery Jackpot. However, it does not include non-parametered increasing prizes resulting from bonus features, which are part of the Game's payable (theoretical %RTP).	☒	☐	☐	
	26.1			
26.2 Design and operation of the Progressive Jackpot	26.2			
26.2.1 Progressive Jackpot fairness	26.2.1			
For a Progressive Jackpot the following rules must apply:	☒	☐	☐	See below:
	26.2.1			
(a) All Players playing Progressive Jackpot Games must be informed of the actions that will give them the chance to win the Progressive Jackpot.	☒	☐	☐	
	26.2.1.a			
(b) In the event that the bets from the Progressive Jackpot form part of the calculation of the RTP % calculation, these bets must not be treated as revenue. If a Participation cap is set for the Progressive Jackpot, once that cap has been reached all additional contributions will be credited to the diversion pool. The minimum return to the	☒	☐	☐	
	26.2.1.b			

GREECE REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	
	EXTERNAL REF #			
Decision of the Minister of Finance number No.58876 EE 2022/06.05.2022				
Player must be achieved regardless of the number of betting units calculated.				
(c) The rules of the Game must include the way in which the Progressive Jackpot is funded and determined.	☒	☐	☐	
	26.2.1.c			
(d) If there is a minimum Betting amount, in order for a Player to win a Progressive Jackpot the base Game (without the Progressive Jackpot) must meet the minimum return to Player requirement.	☒	☐	☐	
	26.2.1.d			
(e) The current amount of the Progressive Jackpot must be displayed on the devices of the Players participating in it. This screen must be displayed on all Players' devices, at least every 30 seconds.	☒	☐	☐	
	26.2.1.e			
NOTE: It is accepted that, depending on the device, communication times differ and are beyond the Licence Holder's knowledge or control. Server delays to the Player Device will vary from Player to Player and from message to message.				
(f) The rules of the Game must inform the players of the shortcomings of the communication device for the Game, and how this affects them.	☒	☐	☐	
	26.2.1.f			
(g) The rules of the Game must inform the players about the maximum prizes and/or periods of time that may exist for each Progressive Jackpot.	☐	☐	☒	N/A, the maximum prizes or periods of time that the Progressive jackpot may exist will depend on the operator and are to be tested during integration.
	26.2.1.g			
(h) For Progressive Jackpots offering multiple levels of prizes, the Player must always be awarded the highest amount if he/she achieves a specific combination which triggers payment of the highest prize. This may occur when a winning combination may correspond to more than one of the available combinations in the payable (that is to say, a flush is a type of straight flush and a straight flush is a type of royal flush). Therefore, there may be cases where the levels of the Progressive Jackpot must be swapped to ensure that the Player receives the highest possible value based on all the combinations that define the outcome.	☒	☐	☐	
	26.2.1.h			

GREECE REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	
	EXTERNAL REF #			
Decision of the Minister of Finance number No.58876 EE 2022/06.05.2022				
(i) In the event that multiple Progressive Jackpots occur around the same time and there is no way to know which jackpot occurred first, it must be ensured that these hits are considered to be simultaneous wins. Payments of prizes for simultaneous wins must be carried out in accordance with the rules of the Game. The rules of the Game must include information on this point.	☐	☐	☒	N/A, Jackpots are designed to only assign one of the levels at once.
	26.2.1.i			
26.2.2 Slave Progressive Jackpot controllers	26.2.2			
When a 'Master Controller' uses 'Slave Controllers' to verify a Progressive Jackpot, the following requirements apply:	☐	☐	☒	N/A, the jackpot system under evaluation does not include any slave-Master controller.
	26.2.2			
(a) All the 'Slave Controllers' must be time synchronised with the 'Master Controller'.	☐	☐	☒	N/A, the jackpot system under evaluation does not include any slave-Master controller.
	26.2.2.a			
(b) The 'Master Controller' must be time synchronised with the CIS.	☐	☐	☒	N/A, the jackpot system under evaluation does not include any slave-Master controller.
	26.2.2.b			
(c) The Progressive Jackpot win events must be timestamped and the Progressive Jackpot controller must ensure that hits that have been recorded with minimal time differences are considered to be simultaneous wins. Payments of prizes for simultaneous wins must be carried out in accordance with the rules of the Game.	☐	☐	☒	N/A, the jackpot system under evaluation does not include any slave-Master controller.
	26.2.2.c			
(d) The minimum 'window' period (Progressive Jackpot Reset Period) must not be less than the longest time period required to:	☐	☐	☒	N/A, the jackpot system under evaluation does not include any slave-Master controller.
	26.2.2.d			
i) register that a Progressive Jackpot has been won;	☐	☐	☒	N/A, the jackpot system under evaluation does not include any slave-Master controller.
	26.2.2.d.i			
ii) announce the victory on the screens of the devices of all participating Players with active sessions;	☐	☐	☒	N/A, the jackpot system under evaluation does not
	26.2.2.d.ii			

GREECE REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	
	EXTERNAL REF #			
Decision of the Minister of Finance number No.58876 EE 2022/06.05.2022				
				include any slave-Master controller.
iii) reset the Progressive Jackpot meters.	☐	☐	☒	N/A, the jackpot system under evaluation does not include any slave-Master controller.
	26.2.2.d.iii			
(e) In the event that a Progressive Jackpot is supported that is determined by increases in the Stakes of individual Players, the processing of the receipt of the increases from all Player devices, whether they are connected to the 'Master Controller' or the 'Slave Controller', must be fair.	☐	☐	☒	N/A, the jackpot system under evaluation does not include any slave-Master controller.
	26.2.2.e			
26.2.3 Progressive Jackpot Win Notifications	26.2.3			
The following requirements must be met when there is a jackpot win:	☒	☐	☐	See below:
	26.2.3			
(a) a Player who wins must be informed that he/she has won a Progressive Jackpot by the end of the game being played	☒	☐	☐	
	26.2.3.a			
(b) all Players taking part in the Progressive Jackpot must be notified that a Progressive Jackpot has been won at the time of the win in a manner comprehensible to the player	☒	☐	☐	
	26.2.3.b			
(c) the amount of the Progressive Jackpot must be displayed on all devices of Players participating in the jackpot at the time of the win.	☒	☐	☐	
	26.2.3.c			
26.2.4 Changes to the Progressive Jackpot parameters	26.2.4			
The following requirements apply to the setting of progressive jackpots:	☒	☐	☐	See below:
	26.2.4			
(a) When a Progressive Jackpot has started, any changes to its parameters must come into force after the current Progressive Jackpot has been won. These are 'pending' parameters.	☒	☐	☐	
	26.2.4.a			
(b) A Progressive Mystery Jackpot that uses a Hidden Progressive Jackpot amount in order to	☒	☐	☐	
	26.2.4.b			

GREECE REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	
	EXTERNAL REF #			
Decision of the Minister of Finance number No.58876 EE 2022/06.05.2022				
determine the winning of the Progressive Jackpot must not change the amount of the Hidden Progressive Jackpot when the parameters change, if the Progressive Jackpot is active (i.e. where contributions from the Progressive Jackpot are added to it).				
(c) The CIS must provide a way to display the current and pending parameters of the Progressive Jackpot.	☒	☐	☐	
	26.2.4.c			
(d) The CIS must keep records of the values of all Progressive Jackpot meters, as well as all current or pending parameters of Progressive Jackpots.	☒	☐	☐	
	26.2.4.d			
26.2.5 Partial Progressive Jackpot Redirection	26.2.5			
Diversion Pool schemes are acceptable in which a part of the contributions of the progressive jackpots are redirected to another pool, so that when the Progressive Jackpot is won the diversion pool is added to the seed amount of the next Progressive Jackpot.	☐	☐	☒	N/A, the jackpot system under evaluation does not redirect to another pool.
	26.2.5			
26.2.6 Shutdown of Progressive Jackpot	26.2.6			
In cases where a Progressive Jackpot has to be closed (e.g. malfunction, loss of connectivity, unexpected shutdown), the following requirements must apply:	☒	☐	☐	
	26.2.6			
(a) Players must be given a clear indication that the Progressive Jackpot is not operating (e.g. 'jackpot closed' displayed on the Player Device);	☒	☐	☐	
	26.2.6.a			
(b) It must not be possible to win a Progressive Jackpot while it is in a shutdown state;	☒	☐	☐	
	26.2.6.b			
(c) If the Progressive Jackpot operates in conjunction with another Game (e.g. base game) and the return to Player requirement is only implemented when Progressive Jackpot contributions are included, the other Game may be provided only when the Progressive Jackpot is available;	☐	☐	☒	N/A, the Progressive jackpot operates in conjunction with another game (Base Game), but the implementation of return to player requirements is not restricted to the jackpot contributions.
	26.2.6.c			
	☒	☐	☐	

GREECE REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	
	EXTERNAL REF #			
Decision of the Minister of Finance number No.58876 EE 2022/06.05.2022				
(d) The Progressive Jackpot must be activated following a period of interruption with exactly the same parameters as existed before the interruption, including the value of the Progressive Jackpot and the hidden win amount for the Mystery Jackpot.	26.2.6.d			
26.2.7 Progressive Jackpot Recovery	26.2.7			
To reset the current values of the Progressive Jackpot amounts in the event of a malfunction of a subsystem of the CIS or the Progressive Jackpot controller:	☒	☐	☐	See below:
	26.2.7			
(a) the current value of the Progressive Jackpot amount must be stored on at least two separate and independent devices (physically separate devices) or	☐	☐	☒	N/A, this is not the case.
	26.2.7.a			
b) it must be possible for the current value of the Progressive Jackpot amount to be calculated accurately from other available measurement information, which must not be stored on the same CIS subsystem as the Progressive Jackpot amount. In any event, all Progressive Jackpot winners selected must be paid as soon as the value is recovered.	☒	☐	☐	
	26.2.7.b			

4. ADDITIONAL INFORMATION/OBSERVATIONS.

N/A.

5. CONCLUSION.

According to the test results^{1,2}, BMM Spain Testlabs s.l.u. confirms that the item submitted for testing is compliant with all the technical requirements listed in section “3. BMM Evaluation Performed”.

Yours sincerely,

Rubén Baptista

SVP Operations EURSAM

¹ The results included in this document refer exclusively to the sample tested, such as it is described in the corresponding section.

² BMM Spain Testlabs s.l.u. will not be held responsible for the results extracted from third party test reports, that are referred to in this document.

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