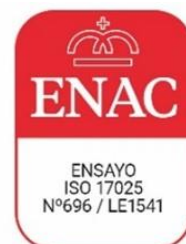


**Evaluation Report for  
CT INTERACTIVE EOOD  
Remote Gaming System (RGS)  
Elephant RGS v5.4**

|                           |                               |
|---------------------------|-------------------------------|
| <b>Manufacturer:</b>      | <b>CT INTERACTIVE EOOD</b>    |
| <b>ATF Report Number:</b> | <b>GRE.CATE-OL.1009.03.01</b> |
| <b>Document Number:</b>   | <b>01</b>                     |
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| <b>Number of Pages:</b>   | <b>8</b>                      |

**BMM Spain Testlabs s.l.u.**

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## GENERAL INFORMATION

|                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Client name &amp; Address:</b>              | CT INTERACTIVE EOOD<br>7 Kukush str.<br>1345 Sofia,<br>Bulgaria                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Client Reference Number:</b>                | Submission request letter dated 21 <sup>st</sup> May 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Testing dates:</b>                          | Start date: 14 <sup>th</sup> June 2024<br>End date: 08 <sup>th</sup> October 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Product / Game Description:</b>             | Remote Gaming System (RGS)<br>Elephant RGS v5.4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Test Category:</b>                          | Category 0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Jurisdictions Recommended:</b>              | Greece                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Technical Standard used for Evaluation:</b> | <ul style="list-style-type: none"> <li>▪ 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)</li> <li>▪ 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</li> </ul> |
| <b>Location where test was performed:</b>      | BMM Spain Testlabs, s.l.u.<br>Edificio Vinson del Parque Empresarial Vallsolana<br>Camí de Can Camps, 17-19<br>08174 Sant Cugat del Vallés - Barcelona (España)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Location where report was issued:</b>       | BMM Spain Testlabs, s.l.u.<br>Edificio Vinson del Parque Empresarial Vallsolana<br>Camí de Can Camps, 17-19<br>08174 Sant Cugat del Vallés - Barcelona (España)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Conclusion:</b>                             | Pass                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>BMM Reference Number:</b>                   | CATE-OL.1009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Method/Procedures used:</b>                 | EURSAM-SPA-MO-04 v6.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Consultant(s):</b>                          | Hesam Khosravi                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

## 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.

CT Interactive RGS (Elephant RGS v5.4) is a remote gaming system which supports online games and guarantees the correct functionality among various parts of the gaming system.

The main functionalities are:

- Random Number Generator Services
- Game Outcome Calculation
- Session Managements and Game Transactions
- Data Transmission
- Data Logging
- Authentication of the system components
- Shutdown, Recovery and Backups
- Connectivity of Various Servers which offer different services.

### 2.2 EVALUATED SOFTWARE.

| Product: Elephant RGS v5.4 |         |          |                   |                        |                                          |
|----------------------------|---------|----------|-------------------|------------------------|------------------------------------------|
| File Name                  | Version | Location | Function          | Digital Signature Type | Digital Signature                        |
| Framework.pm               | 5.4     | Server   | RGS Functionality | SHA-1                  | 5C9A6FFEAD5CEAE95103CCD0173BA2C71F1A0123 |
| RGSCfg.pm                  | 5.4     | Server   | RGS Functionality | SHA-1                  | 3058FC32063AAF43497C2487949B00BE3914744C |

### 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 #                      |                          |                          |       |
| GAMING TECHNICAL SPECIFICATION REGULATIONS FOR THE ORGANISATION AND RUNNING OF ONLINE GAMES OF CHANCE.                                                                                                                                                                                                                                                                                                                                                                        |                                     |                          |                          |       |
| ARTICLE 7 – CONTROL PROGRAM                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                     |                          |                          |       |
| 7.1 Control Program authentication                                                                                                                                                                                                                                                                                                                                                                                                                                            | 7.1                                 |                          |                          |       |
| The CIS must confirm that all elements of the control program/operating environment comprising the CIS are authentic copies of manufacturer-approved CIS elements. This procedure must be implemented automatically upon installation and at least every 24 hours, and upon request. The Licence Holder must send the Authority the control program for approval.                                                                                                             | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 7.1                                 |                          |                          |       |
| a) The authentication mechanism must use a hashing algorithm that produces a file of at least 128 bits.                                                                                                                                                                                                                                                                                                                                                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 7.1 a)                              |                          |                          |       |
| b) A logging or reporting system must be used accessible for a period of 90 days, which presents in detail the results of the authentication checks on each control component.                                                                                                                                                                                                                                                                                                | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 7.1 b)                              |                          |                          |       |
| c) Authentication of the control program must include all elements of the control program that could affect the outcome of Games, or the necessary CIS functions. Those elements of the control program include, among other things, executables, libraries, configurations for the Games or CIS, operating system files, elements that control the necessary reporting system, and elements of the database that affect the outcome of games or the necessary CIS functions. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 7.1 c)                              |                          |                          |       |
| d) Where a component of the control program is considered invalid, the CIS will prevent it being run or deactivate it and automatically stop any function relating to Games of Chance which are related to that component.                                                                                                                                                                                                                                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 7.1 d)                              |                          |                          |       |
| e) Each component of the CIS control program must have a method for being checked and confirmed by third parties via an independent verification process. That verification process must not include any security procedures or software in the context of the CIS. The                                                                                                                                                                                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 7.1 e)                              |                          |                          |       |

| GREECE REGULATIONS & ONLINE GAMING                                                                                                                                             | PASS                                | FAIL                     | N/A                                 | NOTES                                                                                                                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|-------------------------------------|----------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                | EXTERNAL REF #                      |                          |                                     |                                                                                                                      |
| GAMING TECHNICAL SPECIFICATION REGULATIONS FOR THE ORGANISATION AND RUNNING OF ONLINE GAMES OF CHANCE.                                                                         |                                     |                          |                                     |                                                                                                                      |
| test laboratory must, before approving the CIS, approve the integrity check method.                                                                                            |                                     |                          |                                     |                                                                                                                      |
| Article 10 - Incomplete Games                                                                                                                                                  |                                     |                          |                                     |                                                                                                                      |
| 10.1 Incomplete Games                                                                                                                                                          | 10.1                                |                          |                                     |                                                                                                                      |
| A Game is incomplete when the outcome of the Game remains unresolved, or the Player cannot clearly see the outcome. Incomplete Games may arise from:                           | 10.1                                |                          |                                     |                                                                                                                      |
| b) the Gaming Platform rebooting;                                                                                                                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                                                                                                                      |
|                                                                                                                                                                                | 10.1 b)                             |                          |                                     |                                                                                                                      |
| e) a game deactivation command from the Gaming Platform while the game is being played.                                                                                        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                                                                                                                      |
|                                                                                                                                                                                | 10.1 e)                             |                          |                                     |                                                                                                                      |
| Article 11 – SHUTDOWN AND RECOVERY                                                                                                                                             |                                     |                          |                                     |                                                                                                                      |
| 11.1 General Statement                                                                                                                                                         | 11.1                                |                          |                                     |                                                                                                                      |
| The CIS must have the following shutdown and recovery functions:                                                                                                               | 11.1                                |                          |                                     |                                                                                                                      |
| a) The Gaming Platform must be able to perform a graceful shutdown and allow automatic restart after completing at least the following processes:                              | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                                                                                                                      |
|                                                                                                                                                                                | 11.1 a)                             |                          |                                     |                                                                                                                      |
| i) successful completion of program resumption routines, including self-tests;                                                                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                                                                                                                      |
|                                                                                                                                                                                | 11.1 a) i)                          |                          |                                     |                                                                                                                      |
| ii) all critical parts of the Gaming Platform's control program have been authenticated-certified using an approved method;                                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                                                                                                                      |
|                                                                                                                                                                                | 11.1 a) ii)                         |                          |                                     |                                                                                                                      |
| iii)completion and authentication of communication between all parts needed for the Gaming Platform to operate.                                                                | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                                                                                                                      |
|                                                                                                                                                                                | 11.1 a) iii)                        |                          |                                     |                                                                                                                      |
| b) The CIS is able to identify and appropriately manage the cases where there are restarts on other subsystems affecting the outcome of the Game, the win amount or reporting. | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | N/A, restarts on other subsystems don't affect the game outcome. Only RNG and game logic can affect the game result. |
|                                                                                                                                                                                | 11.1 b)                             |                          |                                     |                                                                                                                      |
| c) The CIS can restore the system from the last backup.                                                                                                                        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                                                                                                                      |
|                                                                                                                                                                                | 11.1 c)                             |                          |                                     |                                                                                                                      |

| GREECE REGULATIONS & ONLINE GAMING                                                                                                                                                                                                                                                                                                             | PASS                                | FAIL                     | N/A                      | NOTES |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|-------|
|                                                                                                                                                                                                                                                                                                                                                | EXTERNAL REF #                      |                          |                          |       |
| GAMING TECHNICAL SPECIFICATION REGULATIONS FOR THE ORGANISATION AND RUNNING OF ONLINE GAMES OF CHANCE.                                                                                                                                                                                                                                         |                                     |                          |                          |       |
| d) The CIS can recover all critical information from the time the last backup was created to the time when the malfunction or reboot occurred.                                                                                                                                                                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                | 11.1 d)                             |                          |                          |       |
| Article 12 - MALFUNCTION                                                                                                                                                                                                                                                                                                                       |                                     |                          |                          |       |
| The Gaming Platform:                                                                                                                                                                                                                                                                                                                           |                                     |                          |                          |       |
| a) must not be affected by Player Device malfunctions other than initiating procedures for incomplete Games in accordance with the requirements on incomplete games;                                                                                                                                                                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                | 12 a)                               |                          |                          |       |
| b) must include a mechanism to cancel Wagers and payments in the event of a Gaming Platform malfunction when full recovery is not possible.                                                                                                                                                                                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                | 12 b)                               |                          |                          |       |
| Article 16 - REPORTING                                                                                                                                                                                                                                                                                                                         |                                     |                          |                          |       |
| 16.3 Gaming Performance Report                                                                                                                                                                                                                                                                                                                 | 16.3                                |                          |                          |       |
| The CIS must be able to produce a Gaming Performance Report (or report with a similar name) on demand for the duration of the specific reporting period and at least for specific time periods such as a month to date (MTD), year to date (YTD) and from the start of system operation to date (life to date/LTD) for each game individually. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
| The report must contain the following information:                                                                                                                                                                                                                                                                                             | 16.3                                |                          |                          |       |
| a) the period selected;                                                                                                                                                                                                                                                                                                                        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                | 16.3 a)                             |                          |                          |       |
| b) the Game ID;                                                                                                                                                                                                                                                                                                                                | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                | 16.3 b)                             |                          |                          |       |
| c) the total wagered;                                                                                                                                                                                                                                                                                                                          | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                | 16.3 c)                             |                          |                          |       |
| d) the total won;                                                                                                                                                                                                                                                                                                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |       |
|                                                                                                                                                                                                                                                                                                                                                | 16.3 d)                             |                          |                          |       |

| GREECE REGULATIONS & ONLINE GAMING                                                                                                                                                                                                                                                                                                                                  | PASS                                | FAIL                     | N/A                      | NOTES      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|------------|
|                                                                                                                                                                                                                                                                                                                                                                     | EXTERNAL REF #                      |                          |                          |            |
| GAMING TECHNICAL SPECIFICATION REGULATIONS FOR THE ORGANISATION AND RUNNING OF ONLINE GAMES OF CHANCE.                                                                                                                                                                                                                                                              |                                     |                          |                          |            |
| e) the total contributed to the progressive pool, if applicable;                                                                                                                                                                                                                                                                                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 16.3 e)    |
|                                                                                                                                                                                                                                                                                                                                                                     |                                     |                          |                          |            |
| f) the total refunded;                                                                                                                                                                                                                                                                                                                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 16.3 f)    |
|                                                                                                                                                                                                                                                                                                                                                                     |                                     |                          |                          |            |
| g) the total amounts left in incomplete games.                                                                                                                                                                                                                                                                                                                      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 16.3 g)    |
|                                                                                                                                                                                                                                                                                                                                                                     |                                     |                          |                          |            |
| 16.8 Change Notification Report                                                                                                                                                                                                                                                                                                                                     | 16.8                                |                          |                          |            |
| The CIS must be able to provide a Change Notification Report (or report with a similar name) for all changes to the system, setting or parameter configurations in a Game or at events. Licence Holders (Operators) must submit a report comparing previous settings and new ones relating to the Game or event. The report must contain the following information: | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 16.8       |
|                                                                                                                                                                                                                                                                                                                                                                     |                                     |                          |                          |            |
| a) the full history of information changed/modified by the administrator accounts;                                                                                                                                                                                                                                                                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 16.8 a)    |
|                                                                                                                                                                                                                                                                                                                                                                     |                                     |                          |                          |            |
| b) changes to date/times on the master time server;                                                                                                                                                                                                                                                                                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 16.8 b)    |
|                                                                                                                                                                                                                                                                                                                                                                     |                                     |                          |                          |            |
| c) changes made to Game parameters;                                                                                                                                                                                                                                                                                                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 16.8 c)    |
|                                                                                                                                                                                                                                                                                                                                                                     |                                     |                          |                          |            |
| d) the identity of the employee who made changes in the parameters of the Game (such as the rules of the game, the payment schedules, the rake rate, etc.).                                                                                                                                                                                                         | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 16.8 d)    |
|                                                                                                                                                                                                                                                                                                                                                                     |                                     |                          |                          |            |
| Article 17 – GAME REQUIREMENTS                                                                                                                                                                                                                                                                                                                                      |                                     |                          |                          |            |
| 17.6.2 Back-end History                                                                                                                                                                                                                                                                                                                                             | 17.6.2                              |                          |                          |            |
| For each individual game, in addition to the above information that is needed, the CIS must also record the following information:                                                                                                                                                                                                                                  | 17.6.2                              |                          |                          | Info only. |
| a) the unique Player ID;                                                                                                                                                                                                                                                                                                                                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 17.6.2 a)  |
|                                                                                                                                                                                                                                                                                                                                                                     |                                     |                          |                          |            |
| b) any contributions to Progressive Jackpot draws;                                                                                                                                                                                                                                                                                                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |            |

| GREECE REGULATIONS & ONLINE GAMING                                                                     | PASS                                | FAIL                     | N/A                      | NOTES                                                                                        |
|--------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|----------------------------------------------------------------------------------------------|
|                                                                                                        | EXTERNAL REF #                      |                          |                          |                                                                                              |
| GAMING TECHNICAL SPECIFICATION REGULATIONS FOR THE ORGANISATION AND RUNNING OF ONLINE GAMES OF CHANCE. |                                     |                          |                          |                                                                                              |
|                                                                                                        | 17.6.2 b)                           |                          |                          |                                                                                              |
| c) the game's status (under way, over, etc.);                                                          | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                                                                                              |
|                                                                                                        | 17.6.2 c)                           |                          |                          |                                                                                              |
| d) the table number played in the Game (if any);                                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                                                                                              |
|                                                                                                        | 17.6.2 d)                           |                          |                          |                                                                                              |
| e) the payable used;                                                                                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                                                                                              |
|                                                                                                        | 17.6.2 e)                           |                          |                          |                                                                                              |
| f) the game ID and version.                                                                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A for the game version. The game version will be associated to the game after integration. |
|                                                                                                        | 17.6.2 f)                           |                          |                          |                                                                                              |

#### 4. ADDITIONAL INFORMATION/OBSERVATIONS.

N/A.

#### 5. CONCLUSION.

According to the test results<sup>1</sup> BMM Spain Testlabs s.l.u. confirms that the item submitted for testing is compliant with all the relevant technical requirements listed in section "3. BMM Evaluation Performed".

Yours sincerely,

**Rubén Baptista**

SVP Operations ERSAM

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

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