Certification Report	Skywind Game Audit Report – Joker's Luck Deluxe
Report Identification	SWG-SE-220224-05-GC-R1
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UKAS Accreditation No. 9263	ISO/IEC 17025 ISO/IEC 17020
Dates of testing	10 February 2022 to 18 February 2022
Date of issue of Certification Report	24 February 2022
Report prepared for	Skywind Holdings Limited Unit 2W – Second Floor Quay House South Quay Douglas Isle of Man
Jurisdiction	Spelinspektionen (Swedish Gaming Authority) Kingdom of Sweden
Technical Standards used for testing	SFS 2018:1138 Gambling Act, 14 June 2018. SFS 2018:1475 Gambling Ordinance, 5 July 2018. LIFS 2018:8 Regulations and Guidelines on Technical Requirements and Accreditation of Organisations for Inspection, Testing and Certification of Gambling Service Providers, 25 July 2018. LIFS 2018:5 Regulations and Guidelines for Commercial Online Gambling and Betting, 25 July 2018. LIFS 2018:2 Regulations and Guidelines for Responsible Gaming, 25 July 2018.

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1 Notations

1.1 Confidentiality

This document, all related documents, and methodologies embodied in this document and related documents ("the documents") are the property of Gaming Associates Europe Limited (hereinafter referred to Gaming Associates or **ga**). Unauthorised copying and distribution of the documents, by any means, on any media is prohibited.

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.

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1.2 Disclaimer

ga has reported on what was discovered throughout the assessment period of the client's game 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 conclusion stated.

2 Administration

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2.2 Version

Version	Description	Date
V0.1	Initial draft – SIJA	2022-02-21
V0.2	Reviewed & Updated – ZKHA	2022-02-22
V0.3	QA - UVAS	2022-02-23
V1.0	Final report to Skywind	2022-02-24

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3 Executive Summary

3.1 Introduction

Skywind Holdings Limited (Skywind) has requested Gaming Associates (**ga**) to test their game "Joker's Luck Deluxe" in scope against the requirements of the Swedish Gaming Authority (SGA) as regulated by Spelinspektionen.

This report presents the results of testing performed by **ga** related to the technical scope of testing as per applicable jurisdictional requirements. Hashes of the game are listed in Annex A: Hashes of Critical Components.

3.2 Scope of Testing

Skywind has provided the following game to be tested against the following game related requirements of the SGA (Spelinspektionens) technical standards:

- *SFS 2018:1138 Gambling Act, 14 June 2018,*
- *SFS 2018:1475 Gambling Ordinance, 5 July 2018,*
- *LIFS 2018:8 Regulations and Guidelines on Technical Requirements and Accreditation of Organisations for Inspection, Testing and Certification of Gambling Service Providers, 25 July 2018,*
- *LIFS 2018:5 Regulations and Guidelines for Commercial Online Gambling and Betting, 25 July 2018,*
- *LIFS 2018:2 Regulations and Guidelines for Responsible Gaming, 25 July 2018.*

Game to be tested:

- Joker's Luck Deluxe

This compliance evaluation was performed against game related requirements and does not include the evaluation of technical standards specific to the Platform, Financial Reporting, and Random Number Generator (RNG) as these are outside of the scope of this assessment.

3.3 Test Summary

Information summary of testing results are detailed below.

Game Name	Game Type	Channels (game clients)	Game version / Software build ID	Return to Player (RTP%)	Actual RTP (calculated from simulated game results)
Joker's Luck Deluxe	Slot Game	Desktop and Mobile	0.1.11	94 – 97%	97.01%

3.4 Conclusion and Recommendations

Subject to the scope of testing and on the basis of testing performed by **ga** for Skywind on the game provided, has formed an opinion that the submitted game comply with the applicable technical standards of the jurisdiction of Sweden as regulated by the Swedish Gaming Authority (Spelinspektionen).

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4 Test Results

This section summarises the results of the tests performed on the provided game. The tables in the following sub-sections provide the assessment of compliance status of the game against the applicable requirements of the technical standards of the jurisdiction of Sweden as regulated by the SGA (Spelinspektionen).

The different values used in the tables below within the "Compliance Status" column are described as follows:

Compliant: The testing results comply with the requirement.

Acknowledged: The requirement is only a statement or information.

N/A: The requirement is not applicable for the current product testing.

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

4.1 SFS 2018:1138 Gambling Act

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
Chapter 1	*Scope of the Act*	*Acknowledged*
Chapter 2	*Terminology used in the Act*	*Acknowledged*
Chapter 3	*Requirements on gambling service providers*	*Acknowledged*
Chapter 4	*Licensing*	*Out of scope*
Chapter 5	*Games reserved for the State*	*Out of scope*
Chapter 6	*Gambling for purposes in the public interest*	*Out of scope*
Chapter 7	*Commercial Online Gaming*	*Acknowledged*
Chapter 8	*Betting*	*Out of scope*
Chapter 9	*Land-based commercial gambling*	*Out of scope*
Chapter 10	*Gambling on vessels in international traffic*	*Out of scope*
Chapter 11	*Partners of licence holders*	*Out of scope*
Chapter 12	*Registration of players*	*Out of scope*
Chapter 13	*Player accounts*	*Out of scope*
Chapter 14	*Responsible gambling*	
	Duty of Care	
§ 1	*A licence holder shall ensure that social and health protection considerations are taken into account in the gambling operations in order to protect players from excessive gambling and help them reduce their gambling when this is called for (duty of care). The duty of care involves counteracting the excessive gambling through continuous monitoring of gambling behaviour. A licence holder shall present in an action plan how this duty of care shall be fulfilled.*	*Out of scope*
	Age Limit	
§ 2	*Gambling that requires a licence may not be provided to a person under the age of 18.*	*Out of scope*
	Persons under 20 years of age may not be allowed into a casino.	*Out of scope*
§ 3	*Gambling shall be provided in such a way that the age of players can be verified. The age limit for a game shall be clearly stated at locations where the game is provided.*	*Out of scope*
	Information obligation	

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
§ 4	*A licence holder shall keep all relevant information about the game, including its rules and likelihood of winning, easily accessible to players and authorities.*	*Compliant*
	Such information shall be in Swedish.	*Compliant*
	Designing games	
§ 5	*It is not permitted to specifically design or programme a game so that players are given the impression of being close to winning when such is not the case.*	*Compliant*
	A licence holder may not provide free games, trial games or similar games that have a random outcome different than that for the corresponding game when played with bets.	*Compliant*
	Stakes and specific limits	
§ 6	*Players shall actively specify and confirm their stakes when gambling.*	*Compliant*
§ 7	*In online gambling, players must specify a maximum limit for deposits. In the case of gambling on token gambling machines as per Chapter 5, §§ 7 and 8, a loss limit shall instead be specified.*	*Out of scope*
	Credit ban	
§ 8	*A licence holder or gambling agent may not offer or provide credit for gambling stakes.* *The gambling authority may, for a particular lottery, grant exemptions from the ban in the first paragraph if* *1. the provided lottery is licensed as per Chapter 6,* *2. the credit is for the purchase of lottery tickets for a certain time frame, and 3. the aggregate amount of credit is a maximum of 1/40 the price base amount.*	*Out of scope*
	Bonus offers	
§ 9	*A licence holder may not offer or provide bonus offers beyond the first occasion on which the player participates in a game.*	*Out of scope*
	Self- assessment test	
§ 10	*Licence holders shall provide an online tool that enables players to assess their gambling behaviour.*	*Out of scope*
	Self-exclusion	
§ 11	*A licence holder as per Chapters 5-8 shall ensure that registered players have the option to exclude themselves from gambling for a certain length of time or indefinitely. An indefinite exclusion may not be revoked before twelve months has passed.*	*Out of scope*
	A licence holder who provides casino games online, online bingo and computer- simulated gambling machines shall, on their website, also provide players with an option to immediately exclude themselves from such gambling for 24 hours.	*Out of scope*
§ 12	*A player shall be able, through notifying the gambling authority, to exclude themselves from all gambling that requires registration as per Chapter 12, § 1. The exclusion shall apply at all licence holders for a specified period or indefinitely. An indefinite exclusion may not be revoked before twelve months has passed.*	*Out of scope*
	The gambling authority shall keep a registry of players who are excluded from gambling pursuant to the first paragraph.	*Out of scope*
	Customer service	
§ 13	*Licence holders shall have procedures and staffing in place to handle complaints and other issues concerning the gambling that is provided.*	*Out of scope*

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
	Training	
§ 14	*Licence holders shall continually train their management and staff, both internal and external, who work with product development, marketing, game monitoring, sales and customer service.*	*Out of scope*
	The training shall create awareness and understanding of the risks associated with gambling and the factors that affect players' gambling behaviour.	*Out of scope*
	Specific provisions for employees	
§ 15	*Licence holders shall have provisions that specify the employees and contractors who may not participate in the licence holder's games and ensure that such gambling does not take place.*	*Out of scope*
	Control procedures	
§ 16	*Licence holders shall have procedures in place to detect and counteract actions that are covered by Chapter 19, § 4 on cheating and other violations of the terms of use and game rules.*	*Out of scope*
	Licence holders shall also make it possible for players to immediately notify the licence holder of such circumstances as specified in the above paragraph.	*Out of scope*
	A licence holder may provide the Swedish Police Authority or a prosecutor with information that can point to criminal activity in connection with gambling.	*Out of scope*
Chapter 15	*Marketing*	*Out of scope*
Chapter 16	*Technical requirements*	*Out of scope*
Chapter 17	*Processing of personal data*	*Out of scope*
Chapter 18	*Oversight and other measures*	*Out of scope*
Chapter 19	*Punishments and pecuniary penalties*	*Out of scope*
Chapter 20	*Fees and appeals*	*Out of scope*
Chapter 21	*Authorization*	*Out of scope*

4.2 SFS 2018:1475 Gambling Ordinance

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
Chapter 1	*Scope and terminology used in the Ordinance*	*Acknowledged*
Chapter 2	*Licensing and registration of games*	*Out of scope*
Chapter 3	*Games reserved for the State*	*Out of scope*
Chapter 4	*Gambling for purposes in the public interest*	*Out of scope*
Chapter 5	*Commercial online gambling*	*Acknowledged*
Chapter 6	*Betting*	*Acknowledged*
Chapter 7	*Land-based commercial gambling*	*Out of scope*
Chapter 8	*Gambling on vessels in international traffic*	*Out of scope*
Chapter 9	*Partners of licence holders*	*Out of scope*
Chapter 10	*Player accounts*	*Out of scope*
Chapter 11	*Responsible gambling*	
	Duty of care	

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
§ 1	*Licence holders shall have established procedures to contact players in cases where problem gambling has been identified or suspected.*	*Out of scope*
§ 2	*Licence holders shall document all responsible gambling measures that are taken.*	*Out of scope*
	Limitations on deposits, losses and login time	
§ 3	*Limits on deposits and losses under Chapter 14, § 7 of the Gambling Act (2018:1138) shall be specified by day, week and month.* *If a player wishes to change one of the set limits, the change shall come into effect immediately if it relates to a decrease and after 72 hours at the earliest if it relates to an increase.*	*Out of scope*
§ 4	*In the case of online gambling according to Chapters 5-8 of the Gambling Act (2018:1138) and games on token gambling machines at locations other than casinos pursuant to Chapter 5, § 1 of the same act, players shall specify whether their login time is to be limited. If a player chooses to limit their login time, they shall also specify the exact duration.*	*Out of scope*
§ 5	*Licence holders shall ensure that the limits specified under §§ 3 and 4 cannot be exceeded. If a player raises a limit or sets a deposit limit higher than SEK 10,000 per month, the licence holder shall contact the player in order to fulfil their duty of care pursuant to Chapter 14, § 1 of the Gambling Act (2018:1138).*	*Out of scope*
	Bonus offers	
§ 6	*A licence holder that offers a bonus to a player in accordance with Chapter 14, § 9 of the Gambling Act (2018:1138) shall – in conjunction with providing the offer and use of the offer by the player – inform the player in clear and plain language of the terms and conditions of the offer. Payment of a bonus shall be made as soon as possible after the terms and conditions have been met.* *A bonus to an individual player may not be offered on terms that differ from those offered under the same conditions to other players who play the same game.* *A player shall have at least 60 days to fulfil any terms that may have been linked to the payout of a bonus.*	*Out of scope*
	Self-assessment test	
§ 7	*A self-assessment test in accordance with Chapter 14, § 10 of the Gambling Act (2018:1138) shall be placed in a clearly visible location and always be possible to access on pages of the website where the player can play or where there is information about their player account or information on responsible gambling.*	*Out of scope*
	Self-exclusion	
§ 8	*A licence holder shall inform the player of the self-exclusion option in accordance with Chapter 14, § 12 of the Gambling Act (2018:1138). On their website, licence holders shall also provide a link to the page on the Swedish Gambling Authority's website where one can submit a self-exclusion notification.*	*Out of scope*
§ 9	*Upon registration of a player, the licence holder shall check whether the player is excluded from gambling in accordance with Chapter 14, § 12 of the Gambling Act (2018:1138). If the check reveals that the player has excluded themselves from gambling, the licence holder is to deny the player registration.* *A check of this nature shall also be made every time a player logs in to the gambling system. If the check reveals that the player has excluded themselves from gambling, the licence holder is to deny the player access to the game.*	*Out of scope*
§ 10	*If a licence holder becomes aware that a player is excluded from gambling indefinitely, the licence holder shall immediately close the player account.*	*Out of scope*
§ 11	*The self-exclusion function under Chapter 14, § 11, paragraph 2 of the Gambling Act (2018:1138) shall be clearly visible and accessible from all pages of the website where the player can play or where there is information about their player account or information on responsible gambling.*	*Out of scope*

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
§ 12	*A notification in accordance with Chapter 14, § 12, paragraph 1 of the Gambling Act (2018:1138) shall be personal and contain an express request regarding exclusion.*	*Out of scope*
Chapter 12	*Processing of personal data*	*Out of scope*
Chapter 13	*Oversight and other measures*	*Out of scope*
Chapter 14	*Cooperation*	*Out of scope*
Chapter 15	*Fees*	*Out of scope*

4.3 LIFS 2018:8 Technical Requirements

The following are the Regulations and Guidelines on the Technical Requirements and Accreditation of Organisations for the Inspection, Testing and Certification of Gambling Service Providers.

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
Chapter 1	*Scope*	*Acknowledged*
Chapter 2	*Inspection, testing and certification*	*Acknowledged*
Chapter 3	*Accredited bodies*	*Acknowledged*
Chapter 4	*The licence holder's information security*	*Out of scope*
Chapter 5	*The licence holder's risk and vulnerability management*	*Out of scope*
Chapter 6	*The licence holder's system changes*	*Out of scope*
Chapter 7	*Functions for the licence holder's game administration*	
	Activation and Deactivation of Games	
§ 1	*The licence holder must be able to immediately activate or deactivate each game or its players; either one or more games, or an individual player or all players at once.*	*Out of scope*
	Measures pursuant to the first paragraph must be registered and documented. *General advice* *A game can for example be deactivated by temporary concealment if the licence holder discovers faults in the game or relating to an individual player.*	*Out of scope*
§ 2	*It must be possible to finish playing a game that has been deactivated.*	*Out of scope*
	For games played in several steps, it must be possible to finish playing the game when the player next logs in.	*Out of scope*
	Interrupted Game	
§ 3	*It must be possible to finish playing an interrupted game, unless otherwise specified in the rules of the game.*	*Compliant*
	An interrupted game must be shown to the player, along with any bets made, once the gambling system is reconnected.	*Compliant*
	Bets referred to in the second paragraph must be kept separate and be separately reported in the player's player account until the game is finished. *General advice:* *A game can be considered interrupted if, for example, the gambling system is disconnected from the player's equipment, if the gambling system or the player's equipment restarts, or if the gambling system is unexpectedly shut down.*	*Out of scope*

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SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
	A game can also be considered interrupted if it has not been possible to finish a game or a race has been cancelled.	
§ 4	*If an interrupted game is not finished within 90 days, it must be terminated. The rules of the game must clearly state what will happen to a player's bet if a game is terminated before being finished.*	*N/A*
	Fault management	
§ 5	*There must be documented procedures for all games on how to manage faults and deficiencies.*	*Out of scope*
	The rules of the game must clearly state what applies in relation to the player in the event of faults and deficiencies.	*Out of scope*
§ 6	*Any errors and faults that arise must be registered and documented.*	*Out of scope*
	Causes and solutions of errors and faults in the first paragraph must be registered and documented.	*Out of scope*
§ 7	*It must be ensured that an interrupted game or other errors and faults will not negatively affect a player's player account or game balance.*	*Out of scope*
	In the event that a player is unable to finish a game due to errors and faults, there must be a function calculating the amount that will be returned to the player.	*Out of scope*
§ 8	*The value of a pot must not be affected by errors and faults.*	*N/A*
Chapter 8	*Information that a gambling system must be able to generate*	*Out of scope*
Chapter 9	*Functional requirements for the licence holder in relation to the players*	*Out of scope*
Chapter 10	*Payout percentage*	
§ 1	*For games with progressive winnings, the minimum payout percentage must be indicated to the player.*	*N/A*
§ 2	*The gambling system must have a function to monitor the payout percentage of each individual game.*	*Out of scope*
	Data that is generated in accordance with the first paragraph must be stored and kept available for audit.	*Out of scope*
Chapter 11	*Game instructions, payout table and pot*	
	Game Instructions	
§ 1	*Game instructions must be complete, unambiguous and non-deceptive.* *General advice:* *Game instructions may be translated into other languages, in which case they must have the same content as the original instructions.*	*Compliant*
§ 2	*Game instructions and rules must be available without placing a bet.*	*Compliant*
§ 3	*Game instructions must be available through the same type of medium as the game.*	*Compliant*
	Game instructions must be easily accessible. *General advice:* *If the characteristics of a game change temporarily during an ongoing game, the game instructions should be automatically adapted to the change.*	*Compliant*
	Payout table	
§ 4	*There must be documented quality assurance procedures to ensure that the configuration of payout tables is correct.*	*Compliant*

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
	There must be documented procedures to ensure that the calculations of payout tables are correct. *General advice:* *These procedures can be both automatic and manual.*	*Compliant*
	Pot	
§ 5	*There must be rules for how a player can win a pot.*	*N/A*
	It must be clearly stated how the pot is financed and distributed.	*N/A*
§ 6	*It must be clear from the rules how a pot will be divided if there is more than one winner.*	*N/A*
§ 7	*It must be clear from the rules how a licence holder can cancel or terminate a pot.*	*N/A*
Chapter 12	*Abnormal gambling patterns and cheating*	*Out of scope*
Chapter 13	*Functional requirements for random number generators*	
§ 1	*The results from a random number generator must be random, statistically independent, have a correct standard deviation and correct probability distribution.*	*Out of scope*
	The results yielded by the random number generator must not be predictable without knowledge of the applied algorithm, implementation and initial values. *General advice:* *There are several statistical tests that can be used to ascertain the results of a random number generator. The DIEHARD test suite (Marsaglia) and the NIST test suite (National Institute of Standards and Technology) are two of the tests that can be used.*	*Out of scope*
§ 2	*There must be a documented reference to a well-established algorithm and any source code as well as to the recalculation procedure of the random number generator.*	*Out of scope*
	If the random number generator is built in to the software, it must be possible to present the entire source code, along with comments and documentation. *General advice:* *The algorithm that the random number generator is based on should be published in an internationally recognised publication.* *The outcome tests that may be used on generated random numbers include the X2 test (chi-squared-test), the autocorrelation test and the runs test.* *The licence holder can enable verification of the set payout table by having the accredited body or the Swedish Gambling Authority to review programmes, plates, logs, verification lists or other documentation for the payout table.*	*Out of scope*
§ 3	*The random number generator must be able to withstand the set maximum load.*	*Out of scope*
§ 4	*Functions that do not generate outcomes in games but which depend on random elements must* *be based on the results of the random number generator.* *General advice:* *Such functions may include a randomised sequence or placement at a poker table during a tournament.*	*Out of scope*
§ 5	*Calculations based on a random number generator must have a correct standard deviation and correct probability distribution.*	*Out of scope*
	The numbers, symbols or events resulting from the random number generator must correspond with the rules set for the game involved.	*Compliant*

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
	General advice: *If the random numbers are translated into cards, for examples, there should be four aces, four kings, etc. in a normal deck, if the game uses a normal deck.*	
§ 6	*The calculations of the random number generator must correspond to the events registered in the gambling system.*	*Compliant*
§ 7	*If the rules of the game requires a sequence from a random number generator to be set in advance, it is only allowed to generate new sequences if this is stated in the rules.*	*N/A*
§ 8	*Unless otherwise specified in the rules of the game, the results from a random number generate must always be independent of events in the current or previous games.*	*Compliant*
	Drawing equipment without a random number generator	
§ 9	*The results from drawing equipment without a random number generator must be random, statistically independent, have a correct standard deviation and correct probability distribution.* *General advice:* *The outcome tests that may be used on generated random numbers include the X2 test (chi-squared-test), the autocorrelation test and the runs test.*	*N/A*
§ 10	*Independent drawing equipment without a random number generator must be kept locked in with limited access.*	*N/A*
	Drawing equipment for live casino games	
§ 11	*Drawing equipment used in live casino games must be monitored and recorded.*	*N/A*
	The recorded material must show compliance with the rules of the game.	*N/A*
	The recording must register date and time.	*N/A*
§ 12	*There must be physical access control for the premises used for live casino games and any associated areas.*	*N/A*
	There must separate access control, at least for different employee categories. *General advice:* *Dealer, floor manager, supervisor, surveillance staff are examples of various types of employees that should be categorised into different authorisation groups.*	*N/A*
Chapter 14	*Functional requirements when agent terminals are used for bets and control*	*Out of scope*
Chapter 15	*Functional requirements for online games*	
	Game design	
§ 1	*Games with interactive options must have illustrations that clearly show current and possible bets.*	*Compliant*
	Games in accordance with the first paragraph must clearly illustrate the possibility of changing or resetting the current bet.	*Compliant*
§ 2	*Each round must last for at least three seconds.*	*Compliant*
	The first paragraph also applies to autoplay functions.	*Compliant*
§ 3	*A player's participation in a game, and the choices made by the player in the gambling system, must be optional.*	*Compliant*
	A player must be given a reasonable period of time to consider the consequences of a choice.	*Compliant*

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
	Repeated choices made by a player in the gambling system must not be able to be placed in a queue. *General advice:* *Choices that can be made include "buy", "pay", "spin", "play", "hold", "draw", "double".*	*Compliant*
	Visual presentation	
§ 4	*The name of the game must be displayed on all pages associated with that particular game.*	*Compliant*
§ 5	*The gambling system must have a function that continuously shows the player how long they have been logged in.*	*N/A*
§ 6	*The gambling system must have a function that continuously shows the player their balance throughout the session.*	*Compliant*
§ 7	*The bet on a game must be clearly displayed.*	*Compliant*
	The player's possible and actual bets, as well as the minimum and maximum bets, must be clearly displayed.	*Compliant*
	The gambling system must have a function that clearly visualises the player's bet, including the total bets in the game. *General advice:* *An example of when a player's bet may be included in the total bets is when the player can bet on a combination of things happening in a single bet.*	*Compliant*
§ 8	*A player must be informed that there are factors beyond their control, which may affect the game and its outcome.* *General advice:* *Factors that may affect a player include the use of automation or add-ons for automatic features.*	*N/A*
§ 9	*The outcome of a game must remain visible for a reasonable period of time.*	*Compliant*
§ 10	*Computer-simulated gambling machines must clearly indicate or illustrate which symbols represent a win.*	*Compliant*
	If different combinations of symbols lead to a win, these must be clearly indicated or illustrated.	*Compliant*
§ 11	*If the characteristics of a game change temporarily the game must clearly indicate the current status before the next game.*	*Compliant*
§ 12	*A symbol that is used in a gambling system must have the same shape and colour throughout that particular game.*	*Compliant*
§ 13	*The number of active decks as well as which cards are included in a particular game must be clearly indicated.*	*N/A*
	The front of the card must clearly show its suit and rank.	*N/A*
	The rules of the game must clearly state when the cards will be shuffled. *General advice:* *In different games, cards other than the playing cards may be included.*	*N/A*
§ 14	*If a non-traditional die is used in a dice game, this must be made clear to the player.* *It must be clearly indicated which side of a die wins a game.*	*N/A*

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
§ 15	*A gambling system must have a function to prevent players playing against themselves.*	*Compliant*
	A gambling system must have a function to discover and prevent one or more players using the same gambling equipment at the same time.	*N/A*
§ 16	*The current pot amount must be visible to all participating players.*	*N/A*
§ 17	*A player must immediately be informed of winning the pot.*	*N/A*
	Once a pot has been won, all players must be informed of its new value.	*N/A*
	Information pursuant to the second paragraph must also be available to players who have not participated in the specified pot.	*N/A*
§ 18	*It must be clearly stated if a pot is not available to a player.*	*N/A*
	It must be ensured that all information given to the players is correct, regardless of whether or not a pot is available.	*N/A*

4.4 LIFS 2018:5 Commercial Online Gaming and Betting

The following are the applicable regulations and guidance for Commercial Online Gaming and Betting.

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
	Scope	
§ 1.	*These regulations and general advice concern those that have a licence to provide gambling services in accordance with Chapters 7 and 8 of the Gambling Act (2018:1138).*	*Acknowledged*
	Expressions used in the regulations	
§ 2.	*The terminology used in the regulations has the same meaning as in the Gambling Act (2018:1138) and the Gambling Ordinance (2018:1475).*	*Acknowledged*
	Casino games	
§ 3.	*The following casino games may be covered by a licence according to Chapter 7, § 1 of the Gambling Act (2018:1138)* *1. Roulette* *2. Baccarat,* *3. Punto Banco,* *4. Blackjack,* *5. Poker, and* *6. Dice games.*	*Acknowledged*
	Player account	
§ 4.	*A player may only have one player account.* *The first paragraph does not apply if the licence holder provides games with different web addresses. In that case, a player may have more than one player account with the licence holder on condition that the licence holder* *1. can identify and establish the player's separate player accounts,* *2. ensure that the player is excluded from all gambling with the licence holder if the player chooses to exclude himself pursuant to Chapter 14, § 11 of the Gambling Act (2018:1138), unless the player actively chooses that the exclusion only applies to a specific game or games, and* *3. can monitor gambling behaviour and transactions on all of the player's separate accounts.*	*Out of scope*
	Temporary player account	

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
§ 5	*A player shall not be able to deposit more than 1/4 price base amount in a temporary player account.*	*Out of scope*
§ 6	*A player that has a temporary player account shall within 15 days of registering be asked to submit documentation that substantiates the information submitted during registration.* *A temporary player account may not be used for gambling for more than 30 days.*	*Out of scope*
	Information to the player	
§ 7	*In addition to what is stipulated in Chapter 14, § 4 of the Gambling Act (2018:1138), the following information shall be kept readily available to players where the licence holder offers gambling services* *1. the licence holder's name, corporate identity number, telephone number and e-mail address,* *2. licence period,* *3. the risks that can be associated with gambling for money,* *4. contact information to a helpline for gambling problems, independent* *from the gambling service provider, that can offer help on the basis of Swedish conditions,* *5. that the Swedish Gambling Authority is the licensing and supervisory authority,* *6. the bet or equivalent in the game in question, and 7. any other costs for participation in the game.* *General advice:* *An example of an independent helpline is Stödlinjen.*	*Out of scope*
§ 8	*The information indicated in § 7, points 1 and 4 is to be clearly visible on the licence holder's homepage, along with the Swedish Gambling Authority's logo with links to the authority's website and the terms of use.*	*Out of scope*
§ 9	*If the current terms of use are changed, and the change is not insignificant, the player shall be informed of the changes before they enter into effect.* *General advice:* *A not insignificant change may, for example, refer to corrections of spelling errors.* *Information to the player regarding changes in the terms of use may, for example, be provided through the player receiving the changes in writing or by approving the new terms of use in connection with login.*	*Out of scope*
	Information specific to poker	
§ 10	*An ongoing poker game is to be made viewable to all logged-in players. The first paragraph does not apply if participants in a poker game require separate registration. In that case, an ongoing poker game is only to be made viewable to the separately registered players.*	*N/A*
§ 11	*The licence holder is to be staffed in accordance with Chapter 14, § 13 of the Gambling Act (2018:1138) at least during the time when it is possible for players to participate in the poker game.*	*N/A*
	Information to gambling agents	
§ 12	*Gambling agents are to be familiar with relevant parts of the Gambling Act (2018:1138), the Gambling Ordinance (2018:1475), regulations, general advice and terms and conditions to which the licence holder is subject, as well as the licence holder's internal procedures and guidelines that relate to and are relevant to the gambling agent operations.* *General advice:* *Relevant parts of the Gambling Act, Ordinance and regulations may, for example, be that a player must be 18 to gamble, that it is prohibited to provide credit for gambling, and that each*	*Out of scope*

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
	player can receive information and help with self-assessment tests, self-exclusion and other problems connected to their gambling.	

4.5 LIFS 2018:2 Responsible Gaming

The following are the applicable regulations and guidance for responsible gaming.

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
	The Swedish Gambling Authority's regulations and general advice on responsible gambling.	
	The Swedish Gambling Authority prescribes1 the following pursuant to Chapter 16, § 3, § 8, point 4, § 10, points 1-4, 7 and § 11, points 1-2 of the Gambling Ordinance (2018:1475) and hereby adopts the following general advice.	*Acknowledged.*
	Scope	
§ 1	*These regulations and general advice apply to those that have a licence in accordance with the Gambling Act (2018:1138) and contain provisions regarding responsible gambling.*	*Acknowledged.*
	Expressions used in the regulations	
§ 2	*The terminology used in the regulations has the same meaning as in the Gambling Act (2018:1138) and the Gambling Ordinance (2018:1475).*	*Acknowledged.*
	Exemption from the requirement of an action plan	
§ 3	*Those holding a licence pursuant to Chapter 6, § 8 or Chapter 9, § 3 of the Gambling Act (2018:1138) are exempt from the requirement of establishing an action plan in accordance with Chapter 14, § 1 of the Gambling Act.*	*Acknowledged.*
	Training	
§ 4	*Training according to Chapter 14, § 14 of the Gambling Act (2018:1138) must at least include the following elements* *1. relevant legislation,* *2. characteristics and symptoms of gambling problems,* *3. prevalence of gambling problems and gambling addiction in the population,* *4. the relationship between gambling problems, gambling addiction and other addiction,* *5. the importance of responsibility when designing games,* *6. the effects of gambling problems and gambling addiction for players, relatives and society,* *7. identification of vulnerable groups, and* *8. the available forms of support and care for gambling problems and gambling addiction.* *For employees working with duty of care, the content and frequency of the training is to be specifically adapted to the individuals' areas of responsibility. The content of the training according to the first and second paragraphs is to be documented.*	*Out of scope*
§ 5	*Training under § 4 is to be conducted within six months of commencement of the employment or assignment with or for the licence holder.* *Information according to § 4, point 1 shall be provided in conjunction with the beginning of the employment or assignment.* *Management and staff according to Chapter 14, § 14 of the Gambling Act (2018:1138) must undergo training at least every third year.* *The licence holder shall keep a list of people who have completed the training and when this was undertaken.*	*Out of scope*

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
§ 6	*Those who only have a licence in accordance with Chapter 6, § 8 or Chapter 9, § 3 do not need to fulfil the training requirement under Chapter 14, § 14 of the Gambling Act (2018:1138).*	*Out of scope*
	Protection of the players' money	
§ 7	*In conjunction with opening a player account, the customer must agree to the separate terms and conditions pertaining to the protection of the players' money in the event of the licence holder becoming insolvent.* *General advice:* *Agreeing to separate terms and conditions may, for example, be done through the player actively approving the new terms of use before logging in.*	*Out of scope*
	Limitations of deposits, losses and login time	
§ 8	*If the conditions for a licence holder to offer a player multiple player accounts are met, the limits specified by the player pursuant to Chapter 11, §§ 3 and 4 of the Gambling Ordinance (2018:1475) shall apply to all player accounts held by a player with the licence holder.*	*Out of scope*
	If the licence holder offers a player multiple player accounts, the licence holder must inform the player that the limits in the first paragraph relate to all the licence holder's gambling services and clarify which gambling services are encompassed by the licence holder's licence.	*Out of scope*
	The player's deposits with the licence holder are to be shown as an accumulative amount on all separate player accounts of the player.	*Out of scope*
§ 9	*In the case of gambling with token gambling machines in accordance with Chapter 5, § 1 of the Gambling Act (2018:1138) in locations other than at a casino and commercial online gambling in accordance with Chapter 7, the player is to be offered the possibility of limiting their login time per day, week and month.*	*Out of scope*
	If the conditions for a licence holder to offer a player multiple player accounts are met and the player chooses to limit the login time, this shall apply to all player accounts held by a player with the licence holder.	*Out of scope*
	If the player wants to change a limit as per the first paragraph, the change shall apply immediately if it relates to a shortening of the login time, and if the change relates to an extension, no earlier than 72 hours from when the established time limit expires.	*Out of scope*
	Self- assessment test	
§ 10	*A self-assessment test must be designed by an independent party.* *A self-assessment test is to be based on current knowledge and research* *on problem gambling and also be the subject of regular follow-ups.* *General advice:* *A generally accepted self-test is that of the national gambling helpline, Stödlinjen, to which licence holders can link.*	*Out of scope*
	Information on winnings, losses and logged-in duration	
§ 11	*In the case of gambling with token gambling machines in locations other than at a casino in accordance with Chapter 5, § 1 of the Gambling Act (2018:1138), the licence holder must ensure that a person cashing in a voucher is the same person indicated on the voucher.*	*Out of scope*
§ 12	*In the case of gambling with token gambling machines in locations other than at a casino in accordance with Chapter 5, § 1 of the Gambling Act (2018:1138), the player must receive regular, clear and varied notifications concerning winnings and losses and information on how long the player has been logging in.* *The notifications under the first paragraph are to be shown as often and for as long as is required to counteract excessive gambling. The notification shall subsequently be*	*Out of scope*

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
	acknowledged by the player, and the player shall be given the opportunity in connection with the acknowledgement to choose between ending or continuing their gambling.	
§ 13	*In the case of online gambling in accordance with Chapters 7 and 8 of the Gambling Act (2018:1138), the player must receive regular, clear and varied notifications concerning winnings and losses and information on how long the player has been logged in.* *The notifications under the first paragraph are to be shown as often and for as long as is required to counteract excessive gambling. The notification shall subsequently be acknowledged by the player, and the player shall be given the opportunity in connection with the acknowledgement to choose between ending or continuing their gambling.*	*Out of scope*
§ 14	*In the case of gambling with token gambling machines in locations other than at a casino in accordance with Chapter 5, § 1 of the Gambling Act (2018:1138), the player shall, every time during login, receive clear information about the licence holder's responsible gambling measures, the player's own limitations according to Chapter 14, § 7 of the Gambling Act, and the player's accumulated losses for the past twelve months.*	*Out of scope*
§ 15	*In the case of online gambling in accordance with Chapters 7 and 8 of the Gambling Act (2018:1138), the player shall, every time during login, receive clear information about the licence holder's responsible gambling measures, the player's own limitations according to Chapter 14, § 7 of the Gambling Act, and the player's accumulated losses for the past twelve months.*	*Out of scope*
§ 16	*In the case of gambling with token gambling machines in locations other than at a casino in accordance with Chapter 5, § 1 of the Gambling Act (2018:1138), there must be logotypes with links to self-assessments, restrictions (gambling budget), limitation of login time and exclusion from gambling. The logos are provided by the Swedish Gambling Authority and are to be pinned where they are clearly visible on the screens of the token gambling machines.*	*Out of scope*
§ 17	*In the case of online gambling in accordance with Chapters 6-8 of the Gambling Act (2018:1138), there must be logotypes with links to self- assessments, restrictions (gambling budget), limitation login time and exclusion from gambling. The logotypes are provided by the Swedish Gambling Authority and must be pinned at the top of all the licence holder's websites, mobile websites, applications and similar.*	*Out of scope*
	Stakes	
§ 18	*Stakes shall be given in SEK.*	*Compliant*
	Designing games	
§ 19	*A game may not give the impression that the player's approach or choices have an impact on their probability of winning, if winning is exclusively down to chance.*	*Compliant*
§ 20	*If the licence holder offers options that impact the outcome of the game, a notification shall be displayed for the player for at least three seconds before an automatic choice is made.*	*N/A*
	Information to the Swedish Gambling Authority	
§ 21	*Those with a licence to provide gambling with token gambling machines in locations other than at a casino in accordance with Chapter 5, § 1, or a licence according to Chapters 7 and 8 of the Gambling Act (2018:1138), must, for the period 1 January until 30 June each year and 1 July until 31 December each year, report the following information to the Swedish Gambling Authority* *1. the number of registered players,* *2. the number of players that have participated in gambling for money, 3. the number of players that have lowered and increased their limit* *respectively, both in time and money,* *4. the number of players that have reached their limit in time and money* *respectively,* *5. the number of completed self-assessment tests,* *6. the number of people that have contacted the licence holder regarding*	*Out of scope*

SGA Req. no.	Spelinspektionen (SGA) Requirements	Compliance Status
	problem gambling, *7. the number of player accounts that have been closed by licence holder and player respectively,* *8. the number of exclusions over 24 hours, for a limited period or indefinitely,* *9. the number of players that have been contacted by the licence holder for suspected or identified problem gambling,* *10. the number of those contacted players under 9 that have reduced their gambling and how much the gambling has decreased on average in per cent, 11. the number of those contacted players under 9 that have chosen to exclude themselves from gambling,* *12. the percentage of the total net turnover that comes from 5 per cent of the players with the highest net turnover,* *13. the net turnover, as an average and mean figure, for players specified in 12, and* *14. the percentage of players that have been contacted by the licence holder and who are players specified in 12.* *The information in the first paragraph, points 1, 2 and 8, is to be reported in categories divided by gender and age with the ranges 18-24 years old, 25-44 years old, 45-64 years old and >65 years old.*	
§ 22	*Those with a licence to provide gambling at a casino in accordance with Chapter 5, § 1 of the Gambling Act (2018:1138) must, for the period 1 January until 30 June each year and 1 July until 31 December each year, report the following information to the Swedish Gambling Authority* *1. the number of unique visitors,* *2. the number of exclusions, for a limited period or indefinitely,* *3. the number of people with restrictions on visits,* *4. the number of people that have contacted the licence holder regarding problem gambling,* *5. the number of players that have been contacted by the licence holder for suspected or identified problem gambling, and* *6.the number of those contacted players under 5 that have then chosen to exclude themselves from gambling.* *The information in the first paragraph is to be reported in categories divided by gender and age with the ranges 20-24 years old, 25-44 years old, 45-64 years old and >65 years old.*	*Out of scope*
§ 23	*Reports under §§ 21 and 22 are to be submitted to the Swedish Gambling Authority no later than the 20th of the following month.*	*Out of scope*

4.6 Return to Player

Information summary of testing results are detailed below.

Game Name	Client Version	Channels (game clients)	Simulation of games run	Game version / Software build ID	Return to Player (RTP%)	Published RTP
Joker's Luck Deluxe	15	Desktop and Mobile	100 million	0.1.11	94 – 97%	97.01%

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5 References

1. *SFS 2018:1138 Gambling Act, 14 June 2018.*
2. *SFS 2018:1475 Gambling Ordinance, 5 July 2018.*
3. *LIFS 2018:8 Regulations and Guidelines on Technical Requirements and Accreditation of Organisations for Inspection, Testing and Certification of Gambling Service Providers, 25 July 2018.*
4. *LIFS 2018:5 Regulations and Guidelines for Commercial Online Gambling and Betting, 25 July 2018.*
5. *LIFS 2018:2 Regulations and Guidelines for Responsible Gaming, 25 July 2018.*
6. *Skywind RNG Evaluation Report for Sweden "RNG.SWE.SKY-OL.1004.04.01.pdf", no version, date 08/09/2021.*
7. *Maths spread sheet "Jokers Luck Deluxe 97.0 v1.0.xlsx", no version, no date.*

Annex A: Hashes of Critical Components

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

Game Name	Critical Component	SHA-1 Hashes
Joker's Luck Deluxe	*game.js*	*B75F41F84FF66E026AA6BBDB08B4F6A17C8D259C*
	constant.js	*EDEC415ECB3B9C0BB45AFAD71E6B285C5E26945F*
	game.js	*7CAE8989B34F9C3F0F225D51EFC1716901F5CDD8*
	weights.js	*81407C14C9AD10368E1E0F18281EC35686525E37*
	reelSets.js	*A2967AD5EC2779F3165FDBAC04E8EBD70599F01F*
RNG	*config.ts*	*F15E40F96380168188EEE93B8833C520DE26F4C4*
	csprng.ts	*7A3BA4D4E5D07F91725ADEDBDA194F48B1A6655E*
	csprngQueue.ts	*6D083A042FEDB929B90D340CBE0049434AF9BE17*
	random.ts	*D48F60F1363A3C875BE12E9C2EBDADB4C9F70EBA*
	cheatsConfig.json	*38A0329B66D2AF76310D7AFF0293EDB418818AAE*
	randomFactory.ts	*62DE3D8223E2EC0932995CDE96B620FAC91F9FB6*

End of Document

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