



Verification report: ITL1601355

Top Entertainment Group Inc. S.A.

**2 Poker Games
Certification Report**

04 October 2016



Verification report: ITL1601355

I. General information

| No. | Description | Details | | | | | | | | | |
|-----|--|--|-----|-----------|-----------|----|----------------------------|-------------------|----|--------------------|-------------------|
| 1. | Identification | 2 Poker Games | | | | | | | | | |
| 2. | Verification body issuing the certificate (test house) | iTech Labs Australia Suite 24, 40 Montclair Ave Glen Waverley, VIC 3150, Australia URL: http://www.itechlabs.com.au E-mail: info@itechlabs.com.au | | | | | | | | | |
| 3. | Guidelines used for testing | Malta Remote Gaming Regulations S.L.438.04 | | | | | | | | | |
| 4. | Details of the module tested | <table border="1"> <thead> <tr> <th>No.</th> <th>Game Name</th> <th>Game Type</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Texas Hold'em* (Ring Game)</td> <td>Multiplayer Poker</td> </tr> <tr> <td>2.</td> <td>Omaha* (Ring Game)</td> <td>Multiplayer Poker</td> </tr> </tbody> </table> <p>* Desktop Download</p> | No. | Game Name | Game Type | 1. | Texas Hold'em* (Ring Game) | Multiplayer Poker | 2. | Omaha* (Ring Game) | Multiplayer Poker |
| No. | Game Name | Game Type | | | | | | | | | |
| 1. | Texas Hold'em* (Ring Game) | Multiplayer Poker | | | | | | | | | |
| 2. | Omaha* (Ring Game) | Multiplayer Poker | | | | | | | | | |
| 5. | Type of the module tested | Poker Games | | | | | | | | | |
| 6. | Produced by | Top Entertainment Group Inc. S.A. Edificio Fuentecantos 2nd Floor, San Jose, Costa Rica Contact: Nikola Novakovic (ellninjo@gmail.com) | | | | | | | | | |
| 7. | Licensee details | N/A | | | | | | | | | |
| 8. | Date of request for verification | 04 August 2015 | | | | | | | | | |
| 9. | Date of completion | 04 October 2016 | | | | | | | | | |
| 10. | Results | Passed all tests, except as specified under sections VI and VII below | | | | | | | | | |
| 11. | Other records | <p>Texas Hold'em and Omaha (i.e. Omaha Hi) are new games and have not been previously certified. Testing was conducted on Desktop Download client.</p> <p>Both games were tested for the following table limits:</p> <ul style="list-style-type: none"> NL (No Limit) PL (Pot Limit) <p>This certification is only for the above-mentioned games. RNG certification is out of scope.</p> | | | | | | | | | |

II. Details of hardware

| No. | Description | Details |
|-----|---|----------------|
| 1. | Produced by | Not applicable |
| 2. | Identification of hardware | Not applicable |
| 3. | Features that characterize the hardware | Not applicable |
| 4. | Reference to verification | Not applicable |
| 5. | Other records | Not applicable |



Verification report: ITL1601355

III. Details of software components

| No. | Description | Details | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------------|--|---|-----------|---------|---------------|-------|-------|-------|-----------|-----------|---------------|---------|---------|---------|-------------|----------------|--------|----------------|-------|---------|---------|---------|-------------|----------------|--------|----------------|----------|
| 1. | Produced by | Top Entertainment Group Inc. S.A. Edificio Fuentecantos 2nd Floor, San Jose, Costa Rica Contact: Nikola Novakovic (ellninjo@gmail.com) | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2. | Details of the software components | <table border="1"> <thead> <tr> <th>Game Name</th> <th>Release</th> </tr> </thead> <tbody> <tr> <td>Texas Hold'em</td> <td>5.3.2</td> </tr> <tr> <td>Omaha</td> <td>5.3.2</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Game Name</th> <th>File Name</th> </tr> </thead> <tbody> <tr> <td rowspan="7">Texas Hold'em</td> <td>Card.cs</td> </tr> <tr> <td>Deck.cs</td> </tr> <tr> <td>Hand.cs</td> </tr> <tr> <td>HandType.cs</td> </tr> <tr> <td>PokerEngine.cs</td> </tr> <tr> <td>Pot.cs</td> </tr> <tr> <td>VariantType.cs</td> </tr> <tr> <td rowspan="7">Omaha</td> <td>Card.cs</td> </tr> <tr> <td>Deck.cs</td> </tr> <tr> <td>Hand.cs</td> </tr> <tr> <td>HandType.cs</td> </tr> <tr> <td>PokerEngine.cs</td> </tr> <tr> <td>Pot.cs</td> </tr> <tr> <td>VariantType.cs</td> </tr> <tr> <td>Table.cs</td> </tr> </tbody> </table> | Game Name | Release | Texas Hold'em | 5.3.2 | Omaha | 5.3.2 | Game Name | File Name | Texas Hold'em | Card.cs | Deck.cs | Hand.cs | HandType.cs | PokerEngine.cs | Pot.cs | VariantType.cs | Omaha | Card.cs | Deck.cs | Hand.cs | HandType.cs | PokerEngine.cs | Pot.cs | VariantType.cs | Table.cs |
| Game Name | Release | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Texas Hold'em | 5.3.2 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Omaha | 5.3.2 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Game Name | File Name | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Texas Hold'em | Card.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Deck.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Hand.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | HandType.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | PokerEngine.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Pot.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | VariantType.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Omaha | Card.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Deck.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Hand.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | HandType.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | PokerEngine.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Pot.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | VariantType.cs | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Table.cs | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3. | Features that characterise the software object | See at the end of this table ¹ | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4. | Any % RTP | See at the end of this table ² | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5. | Reference to verification | Malta Remote Gaming Regulations S.L.438.04 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6. | Other records | None | | | | | | | | | | | | | | | | | | | | | | | | | |

¹ Features that characterise the software object

| No. | Game Name | Game Type | Game Description |
|-----|---------------|----------------------|---|
| 1. | Texas Hold'em | Multiplayer Poker | In Texas Hold'em, each player is dealt two private cards called as 'hole cards'. Five community cards are dealt face-up. All players in the game use these shared community cards in conjunction with their own hole cards to each make |



Verification report: ITL1601355

| | | | |
|----|-------|-------------------|---|
| | | | their best possible five-card poker hand. In Hold'em, a player may use any combination of the seven cards available to make the best possible five-card poker hand, using zero, one or two of their private hole cards. |
| 2. | Omaha | Multiplayer Poker | In Omaha, each player is dealt four private cards ('hole cards') which belong only to that player. Five community cards are dealt face-up on the 'board'. All players use exactly three of the community cards together with exactly two of their hole cards to make the best five-card poker hand. |

² RTP for the game

Not applicable for Multiplayer Poker.

IV. Details of tests

Product identification: 2 Poker Games

| No. | Tests Performed | Details of Tests | Results |
|-----|---------------------------------|--|---------|
| 1. | Game rules & artwork evaluation | Evaluation of game rules and artwork was conducted to ensure that they satisfy relevant requirements in Malta Remote Gaming Regulations S.L.438.04 and the games do work according to the game rules and artwork. | Passed |
| 2. | Functional tests | Functional tests were conducted to verify that the games satisfy the relevant requirements in Malta Remote Gaming Regulations S.L.438.04. | Passed |
| 3. | Emulation tests | Emulation tests were conducted to verify that the game payouts are in accordance with the game rules. | Passed |
| 4. | Source code review | Source code examination was performed on critical components of the software to ensure that the games comply with the relevant standards and that there are no unintended functionalities. | Passed |
| 5. | Other records | <p>Texas Hold'em and Omaha (i.e. Omaha Hi) are new games and have not been previously certified. Testing was conducted on Desktop Download client.</p> <p>Both games were tested for the following table limits:</p> <ul style="list-style-type: none"> NL (No Limit) PL (Pot Limit) <p>This certification is only for the above-mentioned games. RNG certification is out of scope.</p> | Passed |

V. Complete requirements met by the tests

iTech Labs has evaluated the 2 Poker Games as per the relevant Malta Remote Gaming Regulations S.L.438.04. Evaluation details are given below:

| Requirements | Results |
|--|---------|
| Part X – Aborted and Miscarried Games | |
| Part X – 47.1 | Comply |
| Part X – 47.2 | Comply |



Verification report: ITL1601355

| | |
|---|---|
| Part X – 48 | Comply, subject to section VI below |
| Third Schedule – Regulation 25 Technical Requirement for Gaming System | |
| Third Schedule – 1 | |
| Third Schedule – 1a | Comply |
| Third Schedule – 1b | Comply |
| Third Schedule – 2 | Comply, subject to section VI below |
| Third Schedule – 3 | |
| Third Schedule – 3a | Covered by a separate RNG certification |
| Third Schedule – 3b | Covered by a separate RNG certification |
| Third Schedule – 3c | Covered by a separate RNG certification |
| Third Schedule – 4 | Comply |
| Third Schedule – 5 | Comply |
| Third Schedule – 6 | |
| Third Schedule – 6a | Comply |
| Third Schedule – 6b | Comply |
| Third Schedule – 6c | Comply |
| Third Schedule – 6d | Comply |
| Third Schedule – 6e | Comply |
| Third Schedule – 6f | Comply |
| Third Schedule – 7 | Comply, subject to section VI below |
| Third Schedule – 8 | |
| Third Schedule – 8a | Comply, subject to section VI below |
| Third Schedule – 8b | Comply, subject to section VI below |
| Third Schedule – 9 | |
| Third Schedule – 9a | Comply |
| Third Schedule – 9b | Comply |
| Third Schedule – 9c | Comply |
| Third Schedule – 9d | Comply |
| Third Schedule – 9e | Comply |
| Third Schedule – 9f | Comply |
| Third Schedule – 9g | Comply |
| Third Schedule – 9h | Comply |
| Third Schedule – 9i | Comply |
| Third Schedule – 10 | |
| Third Schedule – 10a | Comply, subject to section VI below |
| Third Schedule – 10b | Comply, subject to section VI below |
| Third Schedule – 10c | Comply, subject to section VI below |



Verification report: ITL1601355

VI. Observations

| No. | Description | Remarks | Notes |
|-----|---|---|--------------------------------|
| 1. | <p>Part X – 48</p> <p>(1) If a game is started but miscarries because of a failure of the licensee’s computer operating system, the licensee shall:</p> <p>(a) (i) refund the amount wagered in the game to the player by crediting it to the player’s account or, if the account no longer exists, by paying it to the player in an approved manner; and</p> <p>(a) (ii) if the player has an accrued credit at the time the game miscarries, credit to the player’s account the monetary value of the credit or, if the account no longer exists, pay it to the player in an approved manner;</p> <p>(b) inform immediately the Authority of the circumstances of the incident;</p> <p>(c) refrain from conducting a further game if the game is likely to be affected by the same failure:</p> <p>Provided that the Authority may, by written notice to the licensee, give the licensee other directions which the Authority considers appropriate in the circumstances.</p> | <p>Top Entertainment Group Inc. S.A. is a games manufacturer.</p> <p>It is the licensee’s obligation to make sure these requirements are satisfied.</p> | <p>Licensee responsibility</p> |
| 2. | <p>Third Schedule – 2</p> <p>Both the gaming and financial transactions must be congruent and secure.</p> | <p>Top Entertainment Group Inc. S.A. is a games manufacturer.</p> <p>It is the licensee’s obligation to make sure these requirements are satisfied.</p> | <p>Licensee responsibility</p> |
| 3. | <p>Third Schedule – 7</p> <p>All financial reports produced by the gaming system must be congruent with gaming transaction reports and conversely: Provided that all such reports shall be readily and freely available to the Authority.</p> | <p>Top Entertainment Group Inc. S.A. is a games manufacturer.</p> <p>It is the licensee’s obligation to make sure these requirements are satisfied.</p> | <p>Licensee responsibility</p> |
| 4. | <p>Third Schedule – 8</p> <p>The gaming system must:</p> <p>(a) be capable of producing monthly auditable and aggregate financial statements of gaming transactions, and</p> <p>(b) calculate accurately all taxation and other monies due to the Authority.</p> | <p>Top Entertainment Group Inc. S.A. is a games manufacturer.</p> <p>It is the licensee’s obligation to make sure these requirements are satisfied.</p> | <p>Licensee responsibility</p> |
| 6. | <p>Third Schedule – 10</p> <p>The gaming system must maintain information about significant events as follows:</p> <p>(a) large wins;</p> <p>(b) transfers of funds in excess of such amount as the Authority may from time to time direct by notice in writing to the operator;</p> <p>(c) changes made by the operator to game</p> | <p>Top Entertainment Group Inc. S.A. is a games manufacturer.</p> <p>It is the licensee’s obligation to make sure these requirements are satisfied.</p> | <p>Licensee responsibility</p> |



Verification report: ITL1601355

| | | | |
|--|-------------|--|--|
| | parameters. | | |
|--|-------------|--|--|


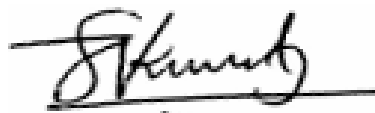
VII. Conditions

When the game is released to production, items listed under **VI. Observations** must be satisfied by the licensee.

VIII. Final declaration and conformity

| No. | Description | Details |
|-----|---------------|---|
| 1. | Certification | Date of certification: 04 October 2016 Software provider: Top Entertainment Group Inc. S.A. Licensee name: N/A Licensee site URLs: N/A Total number of pages: 7 iTech Labs certifies that the 2 Poker Games comply with Malta Remote Gaming Regulations S.L.438.04 for the requirements listed in section V above. iTech Labs recommends that the 2 Poker Games be approved for deployment. |

Signatures:

| | |
|--|---|
|  |  |
| Alvin Rizaldi Senior Consultant iTech Labs Australia 04 October 2016 | Kiren Sreekumar Principal Consultant iTech Labs Australia 04 October 2016 |

IX. Conclusion

While it is not possible to test all possible scenarios in a laboratory environment, iTech Labs has conducted a level of testing appropriate for a submission of this type.
 Accordingly, subject to the above comments, iTech Labs certifies that the items under test comply with the relevant Technical Standards, unless otherwise stated.