

## Testing Strategy Policy and Procedure

### 1) Introduction

This document sets out the obligations of BetIndex Limited (“the Company”) with regard to software testing and security audits in accordance with the legislation and codes of practice as set out by the UK Gambling Commission (“the Commission”).

This Policy shall set out procedures which are to be followed when adding software to the Company’s website(s) and performing the annual security audit. The procedures set out herein must be followed by the Company, its employees, contractors, agents, consultants, partners or other parties working on behalf of the Company.

The Company will comply with all laws and regulations, including guidance notes and guidelines published by the Commission. The Company strives to ensure that all of its website(s) software is compliant. The Commission has introduced the legislation and guidance notes to ensure that the software offered to customers is both secure and fair.

### 2) Software Testing

It is the responsibility of the Company to ensure that all software added to the website(s) has been tested in accordance with the Commissions regulation and legislation.

The Commission has published a list of approved test houses that can perform testing in accordance with their requirements. The approved companies are as follows:

- BMM Testlabs South Africa: [www.bmm.com](http://www.bmm.com)
- Cast Ltd: [www.fairnesstesting.com](http://www.fairnesstesting.com)
- eCOGRA: [www.ecogra.org](http://www.ecogra.org)
- Enex TestLabs: [www.enextestlab.com](http://www.enextestlab.com)
- Gaming Associates: [www.gamingassociates.com](http://www.gamingassociates.com)
- GLI Europe BV: [www.gaminglabs.com](http://www.gaminglabs.com)
- iTech Labs: [www.itechlabs.com.au](http://www.itechlabs.com.au)
- NMI Certin BV: [www.nmi.uk.com](http://www.nmi.uk.com)
- NMI Metrology & Gaming Ltd: [www.nmi.uk.com](http://www.nmi.uk.com)
- Slovenian Institute of Quality and Metrology: [www.siq.si](http://www.siq.si)

The Company will select an approved test house chosen to adequately assess and test for compliance with the Commissions standards. All software available on the website is required to be level 3 compliant. Level 3 compliance is defined as follows:

*Full external third party testing of the game operation integrated on the platform. This*

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*involves verifying the software implementation of the game artwork, maths and theoretical return to player (RTP) through testing of the game on the live environment (or development/staging environment which is essentially the same as the live environment), verification of the actual RTP and game rules utilising the random number generator, and where the digital signatures take on the test platform are the same as those taken on the live environment.*

Upon testing by a Commission approved test house the Company is required to provide the Commission with the relevant certificate in order to obtain approval to integrate the software to the licensed website(s). The Commission state, as a minimum, that the testing report will contain the following information:

- Licensee Name
- Date of Testing
- Game Details – including game name, return to player (RTP), software number and game signature
- Scope and approach for testing – for example, testing completed against the Commission's technical standards, in particular RTS 7A-D\*\*
- Result of testing
- Details of games/versions of games that the game supersedes.

\*\*For the avoidance of doubt, RTS 7 specifically aims to that games operate fairly.

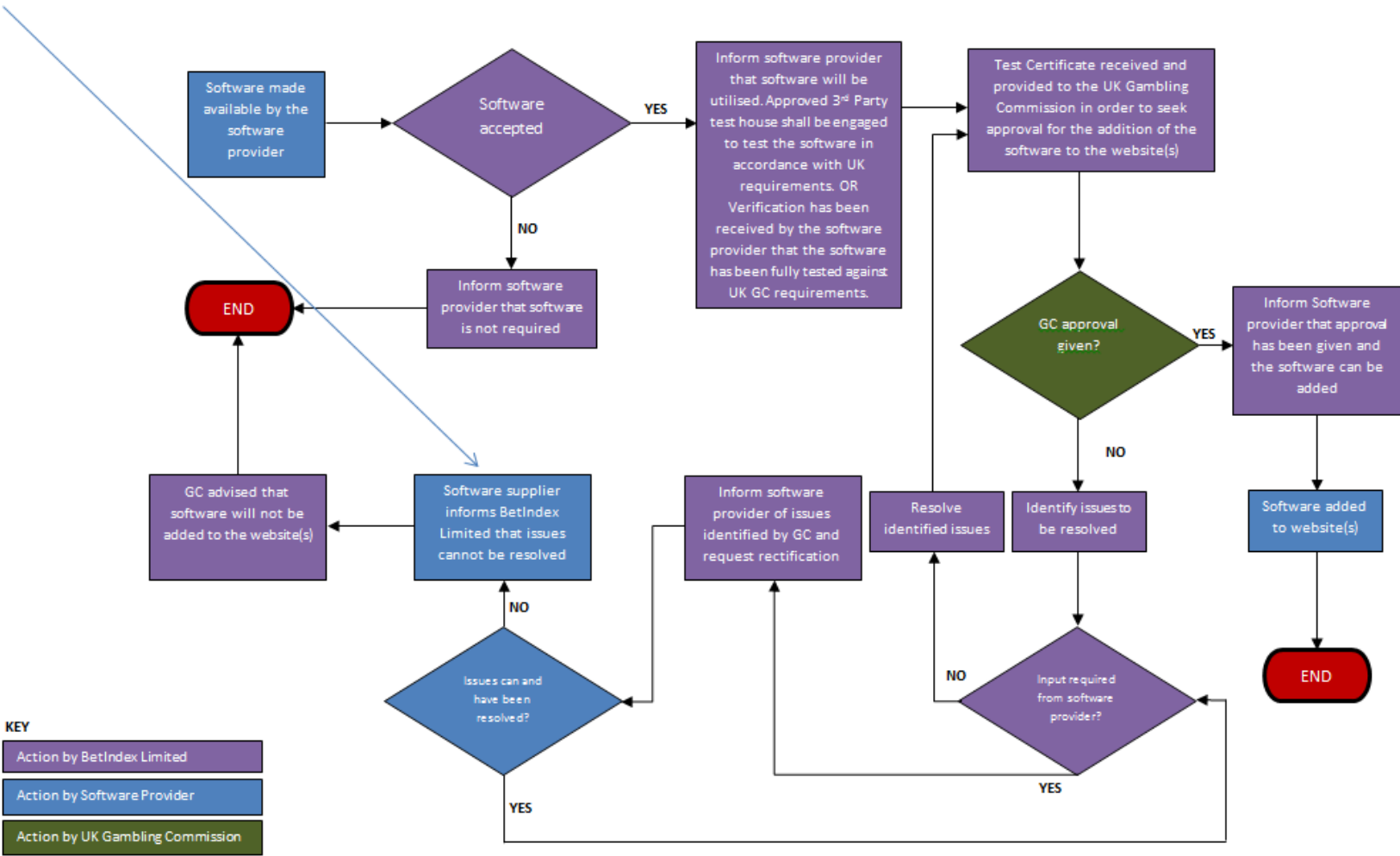
### 3) Procedure for Adding Software to the Licensed Website(s)

The Company will adhere to the following procedure when implementing software onto its website(s).

- New software is made available by the software provider
- The Company decides if it wishes to utilise the new software
- Should the Company wish to utilise the new software the software provider will confirm the certification of the game. The Company may be required to engage with a Commission approved 3<sup>rd</sup> party test house in order to obtain a testing certificate confirming the software is compliance with testing requirements.
- Upon receipt of the testing certificate the Company will revert to the Commission to seek approval to integrate the new software to the licensed website(s).
- The Commission will advise if the new software can be integrated onto the live environment.

In the event that certification is insufficient and approval is not received from the Commission, the new software shall not be integrated. The Company should then review if it wishes to rectify any issues in order to add the new software to its website(s).

## BetIndex Limited - Process flow for adding software to licenced website(s)



## 4) Security Audit

It is the responsibility of the Company to ensure that an annual security audit must be carried out to assess compliance against security requirements set out by the Commission.

The security audit must be undertaken by a third party on an annual basis and the Company must satisfy itself that the security auditor is reputable, suitably qualified to test compliance with BS ISO/IEC 27001:2005 standards and that the auditor is completely independent from the Company.

The Commission has highlighted the systems that are most critical to achieving their aims and the security standards will apply to the following critical systems:

- Electronic systems that record, store, process, share, transmit and retrieve sensitive customer information e.g. credit/debit card details, authentication information, customer account balances.
- Electronic systems that generate, transmit, or process random numbers used to determine the outcome of games on virtual events.
- Electronic systems that store results or the current state of a customer's gamble.
- Points of entry to and exit from the above systems (other systems that are able to communicate directly with core critical systems).
- Communication networks that transmit sensitive customer information.

## 5) Security Audit Procedure

The following procedure will be followed to ensure the Company's security audit is completed in compliance with the Commission's requirements:

- The Company engages with a third party security audit company for certification of its security systems. The third party shall be ISO27001:2005 accredited.
- Upon completion of the security audit the Company will rectify any issues flagged by the auditing company.
- Upon completion the Company shall provide the security audit certificate to the Commission and await any feedback.

## 6) Implementation of Policy

This Policy shall be deemed effective as of the 17<sup>th</sup> July 2015. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.