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G009\_SYSTEMS-TERMS\_RULES

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# Operational systems, terms & conditions, and rules

Guidelines



## 1. Preliminary

### 1.1 Authority

This document is issued by the Financial Services regulatory Commission (the Commission) pursuant to Regulation 105 of the Antigua & Barbuda Interactive Gaming and Interactive Wagering Regulations.

### 1.2 Confidentiality

This document, all related documents, and methodologies embodied in this document and related documents ("the documents") are the property of the Financial Services Regulatory Commission. 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 authorised for use by licence holders.

The documents are copyright.

### 1.3 Disclaimer

The guidelines provided in this document are current at the time of writing. The Commission may in its absolute discretion amend these guidelines, or any definitions or interpretations pursuant to this or related documents at anytime.

Each licence holder should ensure it has the current version of each document.

### 1.4 Queries

All queries relating to this document should be made, in writing, to:

Director of Gaming  
Financial Services Regulatory Commission  
First Caribbean Financial Centre  
Old Parham Road  
St John's  
Antigua and Barbuda

e-mail : [director@antiguagaming.gov.ag](mailto:director@antiguagaming.gov.ag)

### A.1 References & related documents

The Financial Services Regulatory Commission utilised many documents and international standards when compiling the suite of guidelines.

The current list of related guidelines is available from the Commission's website at <http://www.antiguagaming.gov.ag>.

Licence holders and other interested parties should acquaint themselves with the contemporary documents before relying on them.

### 1.5 Table of contents

<b>1.</b>	<b>Preliminary</b> .....	<b>2</b>
1.1	Authority.....	2



1.2	Confidentiality .....	2
1.3	Disclaimer .....	2
1.4	Queries .....	2
A.1	References & related documents .....	2
1.5	Table of contents .....	2
<b>2.</b>	<b>Guidelines .....</b>	<b>4</b>
2.1	Introduction .....	4
2.2	Responsible gaming and wagering .....	4
2.3	Login notification .....	4
2.4	Terms & conditions .....	4
2.5	Notice, information or help .....	5
2.6	Privacy policy .....	5
2.7	Transaction logging .....	5
2.8	Malfunction .....	6
2.9	Complaints .....	6
2.10	Games and game rules .....	6
2.11	Jackpots .....	25
2.12	Poker rooms .....	29
2.13	Player registration and account guidelines .....	33
	<b>End of document .....</b>	<b>37</b>

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## 2. Guidelines

These guidelines supplement and in no way substitute for the mandatory guidelines stipulated in the Interactive Gaming and Interactive Wagering Regulations or any other statutory guideline.

### 2.1 Introduction

The Commission recognises that problem gambling might not be predictable and foreseen. While the “know your customer” and “know the source of funds” guidelines under anti-money laundering and the prevention of terrorism financing are critical to these guidelines, those guidelines are not enough for the purpose of minimising harm with regard to persons susceptible to problematic gambling behaviour.

The prevention of problem gambling in Antigua & Barbuda is an important public policy guideline.

The Commission requires all licence holders to demonstrate year-in-year out effective controls relating to preventing problematic gambling behaviour.

### 2.2 Responsible gaming and wagering

All operational systems shall incorporate controls to protect those vulnerable to problematic gambling behaviour. These controls are documented in **G 012 Responsible gaming and wagering - Guidelines**, which describes guidelines relating to:

- a. login page;
- b. information and links;
- c. customer alerts and controls;
- d. account statements; and
- e. inducements to gamble.

### 2.3 Login notification

When a customer logs into the licence holder’s system either the last time the customer logged-in or the time of the last interactive transaction should be displayed.

### 2.4 Terms & conditions

#### 2.4.1 Notification of terms & conditions

A terms & conditions sheet must exist.

The terms & conditions sheet shall include default opt-out (and subsequent no registration) opt-in recognition of the following matters (terminology to be approved by the Commission pursuant to r 137 of the Interactive Gaming and Interactive Wagering Regulations).

#### 2.4.2 Content of terms & conditions

A section of the terms & conditions shall:



- a. provide information relating to the potential dangers of gambling and problematic behaviour;
- b. require the customer be eighteen (18) years of age; and
- c. require the customer to keep their password and login identification secure.

#### 2.4.3 Retention of terms & conditions

Customers must opt-in to terms & conditions during the registration process. The terms & conditions shall be maintained (without amendment) in the customer profile.

#### 2.4.4 Amendments to terms & conditions

Amendments to terms & conditions must be notified to, and confirmed by, the customer before the customer may continue to participate in interactive gaming or interactive wagering. Such amended terms & conditions should be maintained in the customer profile.

#### 2.5 Notice, information or help

The licence holder should provide a notice, information or help page designed to educate customers in the secure use of interactive gaming and interactive wagering sites. The page or pages for this purpose should contain the following information relating to:

- a. mechanisms to detect if there is unauthorised use of their login details (e.g. comparing last log-in timestamp with own records – see **2.3 Login**, reconciling banking/financial records with deposits and withdrawals from site, etc); and
- b. the limitations of communications media (particularly the Internet) for instantaneous communication, customers need to be made aware of the imperfections of the communications medium and how this may affect them.

#### 2.6 Privacy policy

The licence holder shall have a Privacy Policy as a component of its control systems. Customers and potential customers shall be able to access the Privacy Policy via a link.

#### 2.7 Transaction logging

##### 2.7.1 Production site

Adequate on-site transaction logging is to occur to ensure dispute resolution is transparent.

##### 2.7.2 Redundancy

Adequate off-site transaction logging is to occur (in conjunction with daily backups of customer accounts) to ensure all customer monies can be recovered in the event of a disaster rendering the site inoperable.



## 2.8 Malfunction

Malfunction of equipment will result in the voiding of the game bets and pays and the return of affected bets.

The message “Malfunction Voids All Pays and Play” or its equivalent should be clearly displayed on the rules for each game and in each screen where deposits to the customer account are made.

The licence holder should record all device malfunctions of the gaming equipment (with a reason for malfunction and corresponding solution) and report these to the Commission on a monthly basis. Malfunctions that require bet and/or pays to be voided should be reported to the Commission within one business day.

There should be some mechanism (procedural or otherwise) to ensure the same malfunctions are not repeated.

## 2.9 Complaints

### 2.9.1 Lodging a complaint

Customers shall be provided an easy and obvious means to lodge a complaint with the licence holder.

### 2.9.2 Escalating complaints

Where complaints have been lodged with the licence holder, then customers shall be provided an easy and obvious means to escalate the complaint to the Commission.

### 2.9.3 Recording complaints

Complaints and complaint management activity shall be logged and maintained pursuant to r177 of the Interactive Gaming and Interactive Wagering Regulations.

## 2.10 Games and game rules

### 2.10.1 Server based gaming

All critical functions including the generation of the result of any game (and the return to the player) should be generated by the gaming equipment and independent of the end customer device. This does not restrict the end customer device and the end customer participating in decision processes contributing to the result of the game and the return-to-player (e.g. draw/hold decisions in draw poker or blackjack).

Exemption to this guideline will be considered in implementations where game result determination involving participation of both ends is completely secure and manipulation on the end device cannot interfere with the game integrity.

### 2.10.2 Independent of communications

Game outcome should not be affected by the effective bandwidth, link utilisation, bit error rate or other characteristic of the communications channel between the gaming equipment and the end customer device.



Game rules (see Game rules) should cater for different communications capabilities from different customers and not unreasonably disadvantage customers with less effective communications channels.

### 2.10.3 Game rules

#### **2.10.3.1 Rules – understandable**

Game rules must be able to be understood by the normal person (as judged by the Commission).

Rules should include instructions of play.

#### **2.10.3.2 Rules – static**

Game rules cannot be changed between a customer making a bet and the decision and payment of winnings for the bet.

Game rules should not be changed during a gaming session unless effective notification is given to customer.

#### **2.10.3.3 Rules – content**

Game rules should include the following information:

- a. game name;
- b. restrictions on play;
- c. instructions on how to play – including a pay table for all prizes and special features;
- d. for a multi-player game, whether or not the expected return-to-player can be influenced by other players colluding;
- e. unit and total bet; and
- f. for a multi-player game, whether or not the expected return-to-player can be influenced by any of the other players using an automated strategy/play tool.

#### **2.10.3.4 Rules – fair and accurate**

Games and game rules must be fair and not misleading.

Games must not be designed to give the customer a false expectation of better odds by falsely representing any occurrence or event.

There shall be no near-miss functionality.

Games shall not be designed such that a customer is likely to perceive that he or she has any control over the game when he or she does not.

Games must interact precisely in accordance with the rules.

A game represented as being based on a random event should have an equally likely chance of obtaining any possible combination every time a game is played. That is, the return-to-player shall not be:

- a. manipulated by the system or manual intervention to maintain a constant return-to-player; or
- b. subject to any other form of adaptive behaviour with regard to determination.



#### 2.10.3.5 Rules - available

Game rules shall be available to all customers:

- a. from the screen where game entry can occur; and
- b. before game is entered.

#### 2.10.4 Multi-language game versions

Where a game is provided in multi-language versions then the following should apply:

- a. each version should provide the same return-to-player;
- b. each should be consistent with the instructions for that version; and
- c. all game information should be provided in the language specified for that version - instructions should be the same across all language versions so that no one is advantaged or disadvantaged.

#### 2.10.5 Multiple variations

Multiple variations of any single game name (i.e. return-to-player) shall not be accepted.

#### 2.10.6 Combination of skill and chance

For games with a component of skill, the theoretical return-to-player should represent a reasonably achievable strategy from an average player. The chosen strategy should be documented.

#### 2.10.7 Physical device simulations

Where a game is represented or implied to utilise a simulation of a physical device (e.g. roulette wheel) then the behaviour of the simulation should be identical to the expected behaviour of the physical device. That is:

- a. the visual representation of the device should correspond to the features of the physical device;
- b. the probability of any event occurring should be as for the actual physical device (e.g. the probability of obtaining a "6" on a simulated die throw should be 1/6);
- c. where the game simulates multiple physical devices that would be expected to be independent of one another, each simulated device should be independent of the other simulated devices; and
- d. where the game simulates physical devices that have no memory of previous events, the behaviour of the simulations should be independent of (e.g. not correlated with) their previous behaviour so as to be non-adaptive and unpredictable in practice.

#### 2.10.8 Metamorphic games

Games that are not completely independent of player's history (e.g. metamorphic) should:

- a. display clearly to the customer which game rules apply to the current game state;
- b. display to the customer sufficient information to indicate the current status towards the triggering of the next metamorphosis of the game (e.g. if the game collects tokens, the number of tokens missing or the total number



- required to trigger the metamorphosis should be indicated along with the number of tokens collected at that point);
- c. not adjust the likelihood of a metamorphosis occurring based on the history of prizes obtained in previous games (e.g. games should not adapt their theoretical return-to-player based on past pay-outs); and
- d. Not be misleading.

NOTE: Note that exceptions to (c) will be considered where precise pay-outs consistent with the carded % rtp would yield fractions of a base monetary unit (e.g. fraction of a cent) in the pay-out. In such games integer base monetary prizes may need to be rounded down and up from time-to-time. Such exceptions need to be justified and will be considered on a case-by-case basis.

#### 2.10.9 Game play

The play of games that require monetary payment can only occur during when a customer is logged in and playing.

Where hotlinks are used to supply game information, game play should not occur if the hot linked information is not available.

In the event that a game cannot be continued due to gaming equipment action, all bets should be returned to the customers playing that game.

The end customer device should not operate if sufficient resources are not available to it.

If the gaming equipment extends an invitation to play a particular game, it should accept all legitimate wagers (as defined by rules) for that game – except as limited by the customer as a component of his or her personal limits as defined in **G 012 Responsible gaming and wagering – Guidelines** or bankroll.

The activity necessary to select and play a particular game should be unambiguous.

It should not be possible to start a new game before the current play is completed and all relevant meters have been updated on the gaming equipment and session balance, or if applicable, customer's total funds balance, has been updated. Some exceptions may be granted in instances where, for example, the licence holder elects to conduct off-line, manual consideration of large pay-outs (that is, if a customer chooses to continue gaming while a large pay-out is pending then this should be permitted).

A “replay last game” facility should be provided either as a re-enactment or by description. The replay should clearly indicate that it is a replay of the previous game and provide the following information (as a minimum):

- a. the date and time the game was played;
- b. the display associated with the final position of the game either graphically or via a clear text message;
- c. customer total monetary funds applicable at start of play;
- d. total monetary amount at the end of play;
- e. amount bet including any multipliers (e.g. number of lines/seats played and monetary amount per line or per seat);
- f. the total monetary amount won (base game and separately jackpot win);
- g. details of any amount transferred to or from the session balance, but before the next play;
- h. any customer choices involved in play outcome; and



- i. results of intermediate game phases such as gamble or feature games.

#### **2.10.9.1 Game page displays**

From screens where game play is possible the following information should be displayed or available from an easy to understand link:

- a. game name;
- b. restrictions on play;
- c. instructions on how to play, including a pay table for all prizes and special features;
- d. current account balance displayed in currency (as opposed to “credits”);
- e. unit and total bet; and
- f. for multi-player games, whether or not the outcome to a human player can be affected if another participating end customer device is automated.

#### **2.10.10 Game disable**

The gaming equipment should provide a mechanism for a game to be disabled by the licence holder.

When a game is disabled, customers should be permitted to conclude games in play.

When a game is disabled, the game is not to be accessible to customers (after current games are concluded).

Terminating a game that is in play is a serious matter and so full audit trails should be provided on the use of this function. It is only to be used where there is known and demonstrable system problem.

If an immediate termination feature is used the licence holder may be liable for damages.

The termination of a valid game that is in play is permitted in a multi-state game (e.g. Draw Poker, Blackjack, etc) where the customer has ended their session in the middle of a hand or a period of inactivity greater than 30 minutes has elapsed (during which time the licence holder shall make all reasonable efforts to advise the customer that their game should be finished).

If a valid multi-state game is terminated, the customer should be advised that this has occurred the next time they log on the system.

#### **2.10.11 Incomplete games**

The gaming equipment should provide a mechanism for a customer to complete an incomplete game before a customer is permitted to participate in any other game.

Incomplete games include:

- a. loss of communications between gaming equipment and end customer device;
- b. gaming equipment re-start;
- c. disabled by gaming equipment;
- d. end customer device re-start; and
- e. abnormal termination of gambling application on end customer device.



Upon reconnection by the customer, the gaming equipment is to present the customer the incomplete game for completion.

Multi-stage games (e.g. Draw Poker, Blackjack, etc) that have been disabled by the gaming equipment should be terminated upon the disable of the game.

Bets associated with a partially complete game that can be continued should be held in a separate account until the game completes.

Game rules should specify that bets placed but remaining undecided in incomplete games will become void after 90 days and will be surrendered to the Commission.

#### 2.10.12 Multi-player games

Multi-player games (e.g. Poker) with outcomes that can be affected through an out-of-channel exchange of information between different customers (e.g. Messenger, etc) will only be permitted where clear rules, compensating controls and technology is in place to assure the Commission that the prospect of cheating is addressed and effectively eliminated. Such controls will require certification by an approved testing organisation and approval by the Commission.

Multi-player games with outcomes that can be affected through the use of automated end customer devices or ancillary computer systems (e.g. chess) should have prominent warnings so that customers can make an informed decision whether or not to participate.

The gaming equipment should ensure fairness in the event of a communication loss to one or more end customer devices during a multi-player game.

Multi-player games where a customer's entitlements may be affected by being excluded, should implement some reasonable form of monitoring customer connection time-outs. Allowances for time to re-connect should be commensurate with customer history and stake.

The gaming equipment should not provide for host initiated exclusions for games of this type.

Game rules should cater for situations where the gaming equipment loses connectivity with the customer(s).

#### 2.10.13 Multi-operator games

Multi-operator games will be considered on a case-by-case basis.

Licence holders should note that each operator involved in a multi-operator game will be considered a business associate of the licence holder.

#### 2.10.14 Game artwork

##### **2.10.14.1 Introduction**

This section refers to all forms of artwork. Artwork is defined as anything that appears on the information display or computer screen as a result of a customer interacting with the licence holder systems. The combination of all relevant messages appearing anywhere on the artwork should comply with these guidelines.

These guidelines are based on the collective experience of the Australian and US slot machine gaming industries and seek to address common causes of player confusion, which has been the cause of disputes.



#### **2.10.14.2 General guidelines**

The guidelines of this part apply to artwork regardless of the medium.

#### **2.10.14.3 Instructions & information**

Written messages shall be in English, or such language approved by the Commission (see **2.10.4 Multi-language game versions**). All messages shall be grammatically and syntactically sound.

Game play and device usage instructions should be stated unambiguously and should not be misleading to the customer.

Game instructions and rules should be accessible and visible without the need for money to be bet on the game.

There should be sufficient game instructions to allow a customer to determine the correctness of prizes awarded.

If random prizes are offered the maximum value obtainable from the random prize should be indicated where the customer puts monetary funds at risk.

If the value of the random prize depends on the amount of money wagered, this should be stated.

All statements on the artwork should be true.

The game instructions shall be clearly visible, or the means of displaying such instructions should be readily available at all times.

The name of the game being played should be clearly visible to the customer.

Logos or copyright messages may be displayed.

Artwork graphics shall not be in any manner or form indecent, illegal or offensive (e.g. pornographic or offensive to religion or race).

For non-event based games, a pay-scale on the artwork should correspond to the pay-scale used in the mathematical treatise.

The functions of all buttons represented on a screen should be clearly indicated, preferably on the button.

All game instructions on the artwork should be easily interpreted, unambiguous, and sufficient to explain all game rules. Common sense rules apply.

#### **2.10.14.4 Bet display**

The bet denomination (and where applicable the tokenisation) of the game should be clearly visible or able to be easily deduced.

If a game uses tokens or tokenisation, the number of credits registered for each monetary unit (e.g. \$1 buys 1 000 credits) for the current game should be displayed.

The artwork should either state the maximum bet, the number of credits that can be bet per selected line and the number of possible lines available or it should be possible to deduce this information from the game rules.

The minimum bet (if not easily deduced) should be readily available to the customer.



### **2.10.14.5 Result Display**

The display of the result of a game outcome should not be misleading or deceptive to the player (e.g. should not improperly indicate a near-miss of any type).

The outcome of each game should be displayed for a reasonable length of time.

The nature of all prizes should be clearly indicated. If some prizes are in cash whilst another is in credits, this should be stated.

If the artwork contains game instructions specifying a maximum win, then it should be possible to win this amount from a single game (including features or other game options). For example, if the artwork states that \$10 000 is the maximum prize for a game it should be possible to win \$10 000 on that game.

To the extent that is practicable for the range of games offered, only one method of displaying win amounts may be used on an e-gambling site so as to avoid confusion.

### **2.10.14.6 Spinning Wheel (Reel) guidelines**

#### **2.10.14.6.1 Symbol-prize relationship**

The prizes for the winning patterns of each symbol should be placed in an area that visually belongs to the symbol. This can be achieved with appropriate boxing or framing. The symbol or group of symbols should not invade the area that visually belongs to some other group of symbols if this could cause ambiguities as to which symbols are displayed on the paying line.

#### **2.10.14.6.2 Number of symbols required for a prize**

The number of symbols required to appear in the reels display window, in order to trigger each prize, should be indicated. These numbers should line up with the prizes in order to avoid any ambiguity as to which prize corresponds to which number.

#### **2.10.14.6.3 Shared pay-scales**

If some symbols share the same pay-scale then they should be placed in an area that visually belongs to the pay-scale. This can be achieved with appropriate framing or boxing. The words "OF A KIND" or the equivalent should be placed near the number of symbols required to complete a winning pattern.

#### **2.10.14.6.4 Mixed or grouped symbols**

If prizes can be awarded for mixed or grouped symbols, the artwork should clearly specify the grouping of the symbols either by placing the symbols in an area that clearly belongs to the pay-scale and labelled with the term "Mixed" (or the equivalent) or by using a descriptive term that clearly defines the grouping. Care should be taken with such phrases as "Mixed Bars" or "Mixed Fruit" to ensure that there can be no misinterpretation.

#### **2.10.14.6.5 Tabulated prizes for multiple credits staked**

If the prizes for multiple credits staked are tabulated, then the number of credits bet required for each prize should be placed in a location that clearly indicates which prizes apply to which multipliers. Such numbers should have associated with them the word "credits" or equivalent (i.e. "credits per line" or "total credits bet"). Common tabulations display the number of credits bet as column headings and the number of symbols required as row headings.



If partial tabulation exists, the artwork should clearly indicate that the prize for one credit (or other appropriate bet) staked is multiplied by the number of credits bet (per line). Alternate game instructions should ensure that it is not possible to incorrectly assume that the tabulated prizes are further multiplied by credits bet.

Where both multiplier instructions and tabulated prizes are displayed on artwork, there should be no confusion possible as to whether the multiplier applies to the tabulated prizes or not.

#### 2.10.14.6.6 Winning line pays (pay-lines)

In games that permit multiple credits to be wagered on selected lit lines, the artwork should either clearly state that the win(s) for each selected lit line will be multiplied by the number of credits wagered on that line or show a tabulation of all possible wagers and their pay-outs.

#### 2.10.14.6.7 Scattered pays

The artwork should clearly indicate that scattered pays are multiplied by the total number of credits staked. This may be either via a message or a tabulation of all possible wagers and their pay-outs. If partial tabulation is used the artwork should clearly indicate that the prize for one credit (or other appropriate bet) staked is multiplied by the total number of credits bet. Alternate game instructions should ensure that it is not possible to incorrectly assume that the tabulated prizes are further multiplied by credits bet.

#### 2.10.14.6.8 Scatters

The scattered symbol should be clearly labelled with the word “scatters” once in the game instructions. Further occurrences of the scattered symbol in the game instructions do not require further labelling.

### 2.10.14.7 Positioning, size, colour and shape

#### 2.10.14.7.1 One symbol/prize instructions

Game instructions that belong to only one symbol/prize or a group of symbols/prizes should be clearly associated with the symbol/prize or group of symbols/prizes. This may be achieved with appropriate framing or boxing. Additional wording such as “these symbols” could also be used.

#### 2.10.14.7.2 Global instructions

Game instructions that refer to all symbols/prizes should read “ALL” or equivalent. If some symbols/prizes are excluded from these instructions, this should be indicated with wording such as “EXCEPT” or equivalent.

#### 2.10.14.7.3 Colour of messages

Game instructions should be printed in a colour that contrasts with the background colour to ensure that all instructions are clearly readable. For example black print on dark purple background is not acceptable as it can create confusion.

#### 2.10.14.7.4 Shape of symbols

Symbols that are not characters or numbers should have the same shape throughout all artwork, except while animation is in progress. Any symbol that changes shape or colour during an animation process should not appear in a way that might misrepresent another symbol in the pay table.

#### 2.10.14.7.5 Reference to symbols

If game instructions refer to a particular symbol and the written name for the symbol may be mistaken for another symbol or may imply other characteristics (e.g. “Pair of Sunglasses” might imply two sunglass symbols) the visual display of the instructions should clearly indicate to which symbol the instruction is referred.



This may be via the display of the actual symbol or a more clearly written description or both.

## **2.10.14.8 Substitutes**

### **2.10.14.8.1 Substitute symbols**

The artwork should clearly state which symbols may act as a substitute, in which winning patterns, for which symbols and any conditions that may apply. This may be permitted in the following manner:

- a. an indication that the substitute(s) match “ALL” symbols;
- b. provide a list of symbols that the substitute does match;
- c. provide a list, using the term “EXCEPT”, which the substitute does not match;
- d. provide a statement clearly describing groups of symbols that are substituted.

### **2.10.14.8.2 Substitutes and coinciding wins**

Where a game's rules provide for both coinciding wins being paid on a selected lit line and the use of one or more substitute symbols, the following should apply to the artwork if:

- a. The substitute symbols on their own are awarded a prize and concurrently may substitute for some other symbol (e.g. Sub Sub Sub Queen Queen pays both 3 Subs and 5 Queens), explanations of this rule should be explicitly included. It is not required to state the reverse case where the highest prize only is paid.
- b. Multiple patterns that use substitutes exist on the selected lit line (for example Queen Queen Sub Jack Jack for a game playing Left to Right and Right to Left) and the game only pays one of these combinations, explanations of this rule should be explicitly included. It is not required to state the reverse case where both prizes are paid.
- c. Substitution occurs for patterns where none of the substituted symbols are displayed (e.g. Sub Sub Sub Sub Sub pays for 5 Kings and 5 Queens, etc.) explanation of this rule should be explicitly included. It is not required to state the reverse case where only one prize is paid.

### **2.10.14.8.3 Substitutes participating in scattered wins**

The artwork should contain all rules relative to Substitutes participating in scattered wins. The following should be addressed:

- a. If applicable, the artwork should specifically state when the term “substitutes for all symbols” is used but the Substitute does not participate in scattered wins (e.g. “<sub> substitutes for all symbols except scattered <scatter symbol>”).
- b. The artwork should state pay-out rules for coinciding wins when there are multiple scattered win symbols and substitutes participate, including the situation where one or more scattered symbols may not appear.

### **2.10.14.8.4 Unusual substitutes**

If there is a feature where a symbol may substitute in a winning pattern when the symbol is not on a pay line, this should be clearly specified on the artwork.

### **2.10.14.8.5 Change of substitutes**

The artwork should clearly state if the game provides for a change of substitutes, (e.g. during free games) and any special conditions that may apply. Substitutes and extra pays



If the game provides for extra pays or multipliers apply when substitutes participate in winning patterns, a clear explanation should be provided.

If the game provides for multipliers to apply when substitutes participate in winning patterns, the multiplication factor or a tabulation of all prizes with possible multipliers should be displayed.

If extra pays or multipliers apply when substitutes participate in winning patterns, the handling of winning patterns where multiple substitutes participate is to be clearly explained.

## **2.10.14.9 Winning patterns**

### **2.10.14.9.1 Patterns**

All winning patterns relevant to the particular point in time of a game, should be clearly displayed or accessible on some form of artwork. All undefined patterns are assumed to be non-winning.

Complicated winning patterns should be clearly explained, preferably with pictorial representations.

### **2.10.14.9.2 Scatters patterns**

The winning pattern for scatters should be explicitly stated or displayed.

### **2.10.14.9.3 Pictorial winning patterns**

If generic winning patterns (graphical representation of the order/position in which the winning symbols are to appear) are only represented graphically (without the aid of a written explanation), then they should be supplemented with numbers to indicate how many correct symbols each pattern corresponds to, except for unusual winning patterns (eg X\_X\_x\_X\_X) where numbers should not be displayed and the pattern should be position in proximity to the prize.

### **2.10.14.9.4 Difficult patterns**

Winning patterns that are not “left to right” or “right to left” or “any” should be clearly explained, preferably with pictorial representations.

### **2.10.14.9.5 Selected lit lines**

The artwork should appropriately state that all wins occur on selected lines (and if applicable - except scatters) or equivalent.

### **2.10.14.9.6 Extra lines**

If it is possible to bet on multiple possible lines and it is not clearly obvious which reel positions are part of each of the possible lines, then the additional lines should be clearly displayed on the artwork, and appropriately labelled. The additional lines should either be shown on static artwork or be available for display on a help or pay table screen or permanently displayed on all game play screens in a location separate from the actual reels. This guideline applies to all standard five-reel games where lines greater than five should be schematised on the artwork and appropriately labelled.

### **2.10.14.9.7 Displaying pay lines**

Upon a win, all pay lines should be clearly indicated. If it is possible to bet more than 5 lines, then upon a win for video machines, the pay lines should be indicated in a manner such that all pay lines can be clearly identified by the player.

### **2.10.14.9.8 Coinciding winner rules**

The artwork should clearly state the rules for payments of prizes where multiple wins are possible. The following should be addressed:



- a. a description of what patterns will be paid when a pay line may be interpreted to have more than one individual winning pattern (see also to Substitutes and Coinciding wins);
- b. where the game supports multiple pay lines, a message indicating wins on different pay lines are added or the equivalent is to be displayed;
- c. where the game supports scatters, a message indicating that scattered wins are added to pay line wins or equivalent, is to be displayed if this is the rule of the game;
- d. treatment of coinciding scattered wins with respect to other possible scattered wins should be clearly stated (e.g. the artwork should state whether combinations of scattered symbols pay all possible prizes or only the highest prize); and
- e. where mixed symbol prizes are paid, the treatment of prizes that may be interpreted to be both mixed and straight winners is to be described.

#### **2.10.14.10 Features**

It is not possible to define standards for all kinds of game features that may be developed over time. The following guidelines apply to feature games that are commonly in use in casino machines and may be expected to be used in e-gambling.

##### **2.10.14.10.1 Feature trigger patterns**

The trigger pattern(s) and all other conditions that should occur, in order to trigger the feature, should be unambiguously specified.

##### **2.10.14.10.2 Feature Re-trigger**

The action of the game when feature trigger patterns occur during the feature (eg free games) is to be clearly stated on the artwork (e.g. further triggers, bonus pay-out and/or no further trigger).

##### **2.10.14.10.3 Tokens accumulation**

For games with rules which allow for the accumulation of tokens to qualify for a feature or multiple feature to be triggered or game metamorphosis, the artwork should clearly show:

- a. the definition of the event that leads to the accumulation of tokens;
- b. a description of how many tokens are accumulated with each occurrence of the event;
- c. a description of how many tokens are required to trigger the feature;
- d. an indication of how many tokens are currently accumulated;
- e. if sub-tokens accumulate to tokens, a description of the number of sub-tokens needed to accumulate a token and the number of sub-tokens and tokens currently accumulated;
- f. if the accumulation of tokens may lead to free games, the number of possible lines and credits per line that are to be wagered during the free games; and
- g. game rules when further tokens are not accumulated during the feature sequence for events which normally would qualify to earn tokens.

##### **2.10.14.10.4 Free games**

The artwork should explain all rules relative to free games. Areas relative to free games that should be addressed in addition to the general guidelines above are:

- a. Additional pay-outs for non-winners during the free game sequences, if any, are to be displayed on the artwork. A clear indication if this pay-out is



to be multiplied by credits staked per line or total credits staked, is to be given.

- b. Any multipliers for prizes, special prizes, substitutes and other special rules during free games, are to be displayed on the artwork.
- c. A clear display of an accumulated win amount is required during each stage of the free games if the gaming machine does not directly add wins to the credit meter.
- d. If more than one free game is offered, the number of free games that has occurred or the number remaining (or the total number) should be displayed; and
- e. Appropriate game instructions defining the number of possible lines and credits per line that are wagered during the free games.

#### 2.10.14.10.5 Re-spins/Held reels

This section describes guidelines which apply for artwork for games where one or more reels are automatically “held” for one or more “re-spins”. The rules for the criteria for the re-spin and which reel positions are held should be clear and without possible misinterpretation. Examples of areas that should be addressed are:

- a. which reels are to be held e.g. first two reels;
- b. whether held reels occur on winning or non-winning patterns;
- c. the specific line where the trigger combination should occur, if any (eg “ON THE CENTRE LINE”), or scattered if that is the actual guideline of the game;
- d. if a partial number of reels (e.g. 2, 3 or 4 reels) are held for some criteria, it should be clearly stated what happens when the criteria forms part of a larger pattern (e.g. what happens when all 5 reels meet said guideline);
- e. if the trigger is a winning pattern and the pattern does not pay during re-spins, this should be clearly stated on the artwork;
- f. the rules for extensions or termination of the re-spin sequences including additional held reels, e.g. when there are improvements to the original held combination(s), are to be clearly explained on the artwork; and
- g. if more than one re-spin is offered, the number of re-spins that has occurred or the number remaining (or the total number) should be displayed.

#### 2.10.14.10.6 Bonus prizes

This section refers to games where one or more bonus prizes may be paid to the player during the feature sequence. Generally, bonus prizes are awarded as a result of some second (or subsequent) screen animation:

- a. criteria for both the initial entry and entry to further bonus features are to be clearly stated;
- b. all instructions and player choices for the bonus feature are to be clearly stated;
- c. a display of total amounts won should be available at the end of each stage of the game, including on second screen animations (this is to include display of bonus prizes won in multiple sequence bonus features); and
- d. if bonus prizes are multiplied the artwork should clearly state whether they are multiplied by credits staked per line or total where appropriate.

#### 2.10.14.10.7 Metamorphic sequences

This section refers to metamorphic games where the player still “pays” for the sequence game(s):



- a. all instructions for the game including the differences between the main game and the metamorphic game are to be stated (e.g. <character> appearing anywhere in window pays the original prize which started the feature);
- b. an indication should be stated that the number of lines and/or number of credits wagered during the metamorphic sequence may not exceed the wager of the game or games which triggered the feature if that is the rule of the feature;
- c. any special prizes, substitutes, multipliers or similar rules during the metamorphic sequence should be clearly stated on the artwork; and
- d. if the metamorphic sequence consist of more than one feature game, the number of games in the metamorphic sequence that has occurred or the number remaining (or the total number) should be displayed.

#### 2.10.14.10.8 Held Reel games

This section refers to spinning reel variations with Draw Poker characteristics where the player may hold one or more reels for a second chance to improve the hand. The artwork should address the following:

- a. held and non-held reels, including recommended reels, should be clearly marked on the screen at all times;
- b. the method for changing holds should be clearly displayed to the player;
- c. if the player should wager additional credits to participate in the hold reels phase of the game, this is to be stated; and
- d. display that the player is able to hold or release reels.

#### 2.10.14.10.9 Miscellaneous symbols

If a symbol that can form part of a winning combination is not on all reels, the artwork should clearly show which reels the symbol appears on.

#### 2.10.14.11 Keno/Bingo artwork guidelines

This section refers to games such as Keno and Bingo, where balls (or the equivalent) are drawn from a simulated cage or the equivalent and a player tries to pick in advance which of these balls are selected, then:

- a. the player should be able to view or access a tabulated display of the scorecard, which shows all winning pay-outs, when no game is in progress;
- b. any special rules, which are outside the standard game of Keno, should be clearly explained;
- c. all of the player's selections should be clearly identified on the screen;
- d. the balls drawn should be clearly identified on the screen;
- e. the game should highlight balls drawn which match the player's selections (i.e. "hits");
- f. special hits, if any, are to be clearly identified;
- g. the screen should provide clear indication of how many spots were selected and how many hits;
- h. rules for purchase of additional features of the game, if any, are to be explained; and
- i. the artwork should clearly state how the customer makes or changes selections. Areas to be addressed are how:
  - i) individual numbers are picked;



- ii) individual numbers are cleared; and
- iii) all selections are cleared.

#### **2.10.14.12 Card game artwork guidelines**

This section refers to games which involve the simulated dealing of cards from a deck or deck(s).

##### **2.10.14.12.1 General**

Card faces are to clearly display the card value (e.g. it should be obvious which is a Jack and which is Queen).

Card faces are to clearly indicate the suit (Hearts and Diamonds should be Red, Clubs and Spades Black).

Jokers are to be distinguishable from all other cards.

It should be clearly stated if more than one deck of cards is used in the game.

The artwork should clearly state if the rules of the game do not shuffle the deck after every game. In this instance, the artwork should indicate when shuffles actually do occur.

As a minimum the customer should be able to view a pay-table of the scorecard, which shows all winning hands and their pay-outs, when no game is in progress.

##### **2.10.14.12.2 Poker**

The artwork should provide clear indication if Stud Poker rules apply. Common Draw Poker is assumed, if nothing is stated.

The artwork should provide a definition of winning combinations outside the scope of standard Poker (e.g. Royal Flush without Wild Cards, Four of a kind "Jacks or better", 4 Deuces (when Deuces are wild), etc).

Wild card rules should be clearly explained (e.g. Jokers Wild or Deuces Wild).

Held and non-held cards, including recommended holds (if implemented), in Draw Poker or the equivalents should be clearly marked on the screen, and the method for changing Holds clearly displayed to the player.

Winning hands should be clearly labelled as to the win category (e.g. "Full House").

All special rules outside the scope of common Poker should be clearly explained.

When player options outside the scope of common Poker are currently available, they should be clearly explained on the artwork.

##### **2.10.14.12.3 Blackjack**

Insurance rules are to be clearly explained if Insurance is available.

Pair Split rules should be explained. Areas to be addressed include:

- a. split aces have only one card dealt to each ace, if this is the game rule;
- b. further splits, if available; and
- c. double-down after splits, if available.

Double-down rules are to be clearly explained including limitations of which totals may allow a double down to be selected.

The current total of all hands, including the Dealer's total, should be displayed during and at the end of the game. The term "Bust" or the equivalent may be used to indicate a hand whose total has exceeded 21.

Dealer play rules should be clearly explained, including special treatment of a soft 17 count, if any.



Any limits on the number of cards that may be drawn by Player and/or Dealer are to be explained, including winners declared (if any) when the limit is reached (e.g. Five Under wins).

Surrender Rules are to be explained, if any exist.

If the player loses on “Dealer Push”, this is to be clearly explained.

Winning hands should be clearly labelled as to the win category (e.g. “Blackjack”, “Six Under”, or “Push”).

If Pair Splits have occurred, the results for each hand are to be shown (total points, resultant win or loss category, amount won, amount wagered).

Special rules, if any, should be clearly explained.

All player options that are available at any point in time are to be shown on the artwork.

### **2.10.14.13 Gamble option artwork standards**

The following specifications apply to all games, which provide a gamble option. The most common use is for “Double-up”, where a multiplier of two (2) is sought, but also may apply to other multipliers (e.g. Triple-up) or a selection of multipliers.

#### **2.10.14.13.1 Limits**

The gamble prize limit (if applicable) for a particular game and the maximum number of gambles available should be clearly stated. Note that if wording indicating the maximum prize that can be won exists, then it should be possible to win this prize.

#### **2.10.14.13.2 Automatic exit**

When the gamble option is executed automatically before reaching the maximum number of gambles available, the reason should be clearly displayed.

#### **2.10.14.13.3 References**

All references to gamble should use words such as “gamble” or “double up” which cannot be misinterpreted to indicate some other feature.

#### **2.10.14.13.4 Conditions**

Unusual conditions in which the gamble option cannot be accessed should be specified (ie those conditions not listed in the “Software” chapter).

#### **2.10.14.13.5 Choices of multipliers**

If a gamble game offers a choice of multipliers, it should be clear to the player what is the range of choices/pay-outs.

Once the player has selected a multiplier, it should be clearly stated on the screen which multiplier was selected.

### **2.10.14.14 Other games**

This section is to address games that do not fall into any of the above categories. It is not possible to address all such games, but the following specifications will apply. Other games will be considered on a case-by-case basis.

#### **2.10.14.14.1 General**

Initial player selection options are to be described (e.g. selection of a runner in a horse race should identify name, number and expected pay-out).



Player selection options, once the game has commenced, should be clearly shown on the screen.

The winning amount for each separate wager and total winning amount are to be displayed on the screen.

#### 2.10.14.14.2 Roulette

If standard Roulette is simulated, the following rules apply. Variations will be considered on a case by case basis:

- a. each “Zero” used should be uniquely labelled (e.g. “0”, “00”, “000”);
- b. the simulated Roulette wheel should be in the identical format as a standard casino wheel (including colours of landing locations and position of numbers) with the exception of the position of “Zeroes,” if more than one exists, in which case the “Zeroes” may be placed arbitrarily;
- c. a scorecard or description of all available wagers and their pay-outs should be accessible by the player while not in game play;
- d. the method of selecting individual wagers is to be explained by the rules;
- e. the wager(s) already selected by the Player are to be displayed on the screen; and
- f. the simulated ball spin should result in a location that unambiguously determines the winning number.

#### 2.10.14.14.3 Dice Games

This section refers to standard Dice games. Variations will be considered on a case-by-case basis. The normal guidelines are:

- a. each face should clearly show the number of spots;
- b. simulated die should be of the same layout as standard die (e.g. the 1 and 6, 2 and 5, 3 and 4 respectively should be on opposite faces);
- c. it should be obvious which is the up face on each die after the dice are thrown;
- d. the result of each die should be clearly visible or displayed;
- e. there should be a description of each wagering option available on the artwork (e.g. the Craps wagers “Field” and “Hardway” should be clearly explained); and
- f. all possible wagering options available and obtainable at any point in time should be displayed on the artwork.

#### 2.10.14.14.4 Simulated wagering

This section refers to simulated racing games:

- a. all participants in the race should have characteristics that make it unique in appearance (e.g. number, jockey colours);
- b. the result of the race should be clearly obvious and not open to misinterpretation;
- c. if prizes are to be paid for combinations involving runners other than just the first place finisher, the order of the place getters that can be involved with these prizes should be clearly shown on the screen (e.g. Result 8-4-7);
- d. each meaningful result position should be available for display in all last game replays; and
- e. the rules for alternative wagering options (e.g. quinella), and the expected pay-outs are to be clearly explained on the artwork.



#### 2.10.14.14.5 Scratch ticket

This section refers to games which simulate a lottery scratch tickets or similar, then:

- a. a precise definition of which player options should be taken to complete the game should be shown on the artwork;
- b. details of how pay-outs are won and their amounts should be shown on the artwork (e.g. three matching scratched symbols win that prize); and
- c. all rules for symbols that may substitute in winning patterns should be displayed on the artwork.

#### 2.10.15 Randomness

##### 2.10.15.1 Certification & approval

Where game rules require the use of a random event, then the means of randomness shall be certified by an approved testing agency – refer r 123 of the Interactive Gaming and Interactive Wagering Regulations.

The Commission should approve all methods of random number generation.

##### 2.10.15.2 General

Determination of events of chance should not be influenced, affected or controlled by anything other than numerical values derived in an approved manner from the verified random number generator (RNG), including pseudo-random number generator, in conjunction with the rules of the game. This does not prohibit metamorphic games or jackpots determined by means other than individual game outcome from being considered on a case-by-case basis.

Outcomes derived from the RNG are to be distributed within statistically expected bounds, including normal distribution.

Any mapping or scaling to convert random numbers into events of chance should be linear and the distribution of the events of chance should be identical to the distribution of the unmapped random number from which they were derived. Exceptions to this criterion are metamorphic random prizes awarded under approved rules but not subject to the outcome of any game in particular.

Events of chance should demonstrate that they are statistically random when subject to the same statistical tests for randomness that is specified for the base random number generator.

As events of chance occur (e.g. due to calls to the RNG by the game), they should be immediately used as directed by the rules of the game (i.e. are not to be discarded due to adaptive behaviour by the game).

Where the rules of the game require a sequence or mapping of entities or events to be set up in advance (e.g. the position of hidden objects within a maze), the entities or events should not be re-sequenced or remapped except as provided for in the rules of the game.

Events of chance within games should be independent of (i.e. not correlated with) any other events within the game or any events within previous games - except as provided by the rules of the game and for metamorphic games.



### **2.10.15.3 Functionality**

The fundamental guideline is that the use of an RNG results in the selection of game symbols or production of game outcomes, which are able to be proven to:

- a. be statistically independent;
- b. be uniformly distributed over their range;
- c. pass various recognised statistical tests; and
- d. be unpredictable without the knowledge of the algorithm, its implementation and the current value of the seed (all of which should be secure).

### **2.10.15.4 Choice of RNG**

Any RNG algorithm is at the discretion of the licence holder. However, it shall require certification and approval.

Any hardware RNG device is at the discretion of the licence holder. However, it shall require certification and approval.

Failure of an RNG could have serious consequences for the licence holder as all games may become predictable. If a hardware RNG is used there should be a fail-safe mechanism to disable game play in the event that the device fails. If a software RNG is used then dynamic monitoring of the output is recommended and detected failure should disable game play.

### **2.10.15.5 Seeding**

The method of seed set generation should be a component of the certification and approved – refer **2.10.15.1 Certification & approval**.

The method of seed generation should ensure that the “next” game outcome is NOT predictable.

Reseeding should not be a routine or regular practice. Seeding and reseeding should be kept to a minimum. Both the method of reseeding and the instances when it may occur should be a component of the certification and approved – refer **2.10.15.1 Certification & approval**.

If for any reason the background RNG activity is interrupted (e.g. the random number generator process halts), the next seed value for the RNG should itself be unpredictable.

### **2.10.15.6 Range**

The range of values produced by the RNG should be adequate to provide sufficient precision and flexibility when setting event outcome probabilities (e.g. so as to accurately achieve a desired expected return to customer).

### **2.10.15.7 Scaling**

If a random number with a range shorter than that provided by the RNG is required for some purpose by the game, the method of rescaling (i.e. converting the number to the lower range) is to be designed such that all numbers within the lower range are equally probable.

The scaled sequence of numbers should pass the same statistical tests as applied to the sequence of numbers produced by the RNG. That is, scaling algorithms should not introduce bias, or result in the production of patterns.



RNGs and pseudo-RNGs used for result selection should meet the guidelines of this section.

There should be some means that the verification can be made after the event that the results selected by the RNG computer system are the same as held in the gaming equipment.

## 2.11 Jackpots

### 2.11.1 Procedures

The licence holder's control system shall confirm the gaming equipment complies with this part, and at a minimum, include the following:

- a. details of Jackpot seeding arrangements, jackpot ceiling values, increment rate, reconciliation, monitoring arrangements, etc.;
- b. procedures for payment, i.e. payment limit, authorisation, verification procedures;
- c. payment time frame;
- d. validation procedures;
- e. reconciliation methodology; and
- f. assurances of prize funds being available (including, but not limited to, where jackpots are linked with other operators).

### 2.11.2 Fairness

The following principles should apply to jackpots:

1. All customers that play jackpot games should be made aware of how they can be eligible to win the jackpot.
2. Jackpot contributions are part of the return-to-player calculation, the contributions should not be assimilated into licence holder business revenue.
3. If a cap is established on any jackpot, all additional contributions once that cap is reached are to be credited to a diversion pool. Any minimum return represented to the player should be met regardless of the number of betting units calculated.
4. The rules of the game should include how the jackpot is funded and determined.
5. If a minimum bet amount exists in order for a player to win a linked jackpot, then the base game (excluding the jackpot) should meet any minimum return to player (which may be stipulated by the Commission).
6. All players contributing to the prize should be eligible to win the jackpot whilst they are playing that game.
7. The probability of winning the jackpot should be linearly proportional to the contribution.

### 2.11.3 Notification of the jackpot amount

The current jackpot amount should be displayed on all end player devices participating in the jackpot. This display should be updated on all participating end player devices at least every 30 seconds.



Note: It is accepted that Internet communication delays are variable and beyond the knowledge or control of the licence holder. Server-to-client delays will vary from player-to-player and from message-to-message. Consequently the period necessary to broadcast to all registered players, the current state of any given jackpot should be a consideration. For example, the greater the window, the greater the potential for “simultaneous” wins before a jackpot is reset (multi-state games introduce another level of complexity).

Players utilising the Internet need to be made aware, possibly in the rules of the game, of the imperfections of the communications medium and how this affects them. Licence holders should also consider policy in relation to awarding of jackpot prizes.

#### 2.11.4 Contributions

The rules of the game should clearly specify how the contributions to the jackpot pool are made (based on turnover, net balance of each operator contributing to a multi-operator pool, etc.).

Where a fee is deducted (that is the entire customer contribution is not attributed to the jackpot prize value), then that should be described within the rules.

#### 2.11.5 Win notification

A winning customer should be notified of a jackpot win by the end of game play simulation (being the game that relates to the jackpot win).

Whenever a jackpot is won, the notification of the jackpot being won should be notified to all active end user devices and the jackpot amount should be displayed (so far as it is practical to do so) on all end player devices participating in the jackpot at the time of the jackpot win. (Naturally, notification won't be displayed at the time of the jackpot win if an eligible playing device is being connected when jackpot is won or is transmitting a play instruction or is disconnected when the notification is sent.)

#### 2.11.6 Parameter changes

Once a Jackpot has commenced, parameter changes should not take effect immediately, rather they should be saved to apply after that jackpot is next won. These are 'pending' parameters.

#### 2.11.7 Partial redirection

Diversion pool schemes, where a portion of the jackpot contributions are redirected to another pool so that when the jackpot is won, the pool is added to the re-start level of the next jackpot, should be defined in the rules of the game (as notified to the Commission). The following guidelines apply to such schemes:

- a. a jackpot redirection scheme should not have a mathematical expectation of the diversion pool of infinity;
- b. where a diversion pool is used to fund a “minimum or start-up level” the minimum jackpot amount is deemed to be zero for the purposes of calculations of expected return-to-player i.e. in calculating return-to-player the start-up prize can only be counted once; and
- c. diversion pools shall not be capped.



#### 2.11.8 Multiple winners

The licence holder should address the possibility of a jackpot being won (or appearing to be won) by one or more players at a time that might appear to be simultaneous. The rules of the game should include resolution of this possibility.

#### 2.11.9 Conversion

The licence holder should receive written approval if a jackpot pool is to be converted or combined into another jackpot pool.

The rules of the game should provide for any planned termination of a jackpot, in particular how any outstanding pool amounts are dealt with.

The rules of the game should provide for the administration of the jackpot pool including positive or negative jackpot pool balance. Unplanned jackpot termination should be accounted for.

The rules of the game should cover how the game can be discontinued.

#### 2.11.10 Shutdown

There are instances in this guideline document where it is indicated that the jackpot should be “shutdown”. A jackpot shutdown requires the following action:

- a. clear indication should be given to players that the jackpot is not operating (e.g. by displaying “Jackpot Closed” on end customer devices);
- b. it should not be possible for the jackpot to be won while in the shut down state;
- c. if the jackpot operates in conjunction with another game (e.g. base game) and the return-to-player guideline is only met when jackpot contributions are included the other game may only be offered when the jackpot is available; and
- d. activation of the jackpot from the shutdown state should return the jackpot with the identical parameters including jackpot value, and hidden win amount for mystery jackpots, as before the shutdown.

#### 2.11.11 Meters

The gaming equipment should store and maintain the following software meters as a minimum:

- a. total amount played for jackpots;
- b. total amount of jackpots won;
- c. total jackpot contributions made (includes any diverted amounts);
- d. total jackpot contributions won;
- e. current amount for each jackpot; and
- f. current value of jackpot contributions diverted.

#### 2.11.12 Accounting

If the calculation of gross revenue for business purposes allows for jackpot contributions to be totally deductible (as opposed to deducting jackpot prizes when paid), then the gaming equipment should provide adequate reconciliation to ensure that all jackpot increments deducted:

- a. have been paid to players as prizes;



- b. are displayed as part of prizes; and
- c. are held in accountable reserves (which can be demonstrated) to be paid to customers in the future (i.e. as part of future prizes).

Accounting reconciliation shall be performed daily.

#### 2.11.13 Recovery

To enable recovery of the current value of a progressive jackpot amount(s) in the case of gaming equipment failure, either:

- a. the current value of the progressive amount should be stored in at least two physically separate devices, or
- b. the current value of the progressive amount should be able to be accurately calculated from other available metering information that is not stored in the same system as the operational progressive amount.

#### 2.11.14 Multi-operator jackpots

All participants in multi-operator jackpots, including the jackpot provider and other gaming operators, whether licenced in Antigua or not, are associates of the licence holder.

The Commission shall consider multi-operator jackpots on a case-by-case basis.

#### 2.11.15 Jackpot controller

The jackpot controller is deemed to be part of the gaming equipment even if it is a physically separate controller.

Where a “master controller” employs “slave controllers” to control a jackpot (e.g. multi-operator jackpot) the following guidelines apply:

- a. all slave controllers are to be time synchronised with the master controller;
- b. the master controller is to be time synchronised with the gaming equipment;
- c. if a jackpot is determined as the result of a game result then win events should be time stamped and the jackpot controller should ensure that hits registered within a “minimum time increment” are considered as “simultaneous wins”;
- d. prize pay-outs for simultaneous wins shall be made in accordance with **2.11.8 Multiple winners**.
- e. For determining “simultaneous wins”, the “minimum time increment” (aka jackpot reset period) is not less than the longest time taken to:
  - (i) register that a jackpot has been won;
  - (ii) announce the win on the displays of all participating and player devices; and
  - (iii) reset the progressive meters; and
- f. If supporting a jackpot that is determined by increments of individual players’ wages, the processing of receipt of increments from all end player devices, whether attached to Master or Slave controllers, should be fair.



## 2.12 Poker rooms

### 2.12.1 Introduction

Poker shall be treated as a separate game from other casino games. Poker requires particular attention with regard to fairness and anti-money laundering and the prevention of terrorism financing considerations.

### 2.12.2 Procedures

The control systems shall contain detailed procedures, which describe the licence holder's controls applicable to poker rooms, should this game be available to customers. This is required, whether the licence holder controls the poker room or whether the poker room is controlled by another entity (an associate).

The licence holder shall particularly address controls which ensure fraud does not put its financial position at risk.

### 2.12.3 Types of poker rooms

For the purpose of this part (**2.12 Poker rooms**) the following differentiation of poker rooms is made:

#### 2.12.3.1 **Type 1 –Antiguan poker**

All customers are registered pursuant to Antigua and Barbuda Interactive Gaming Licences, whether those customers are registered with the licence holder or not.

The poker room is controlled, operated, and domiciled in Antigua and Barbuda.

#### 2.12.3.2 **Type 2 – associated poker**

The poker room is operated in a foreign jurisdiction.

#### 2.12.3.3 **Type 3 – hosting poker**

Customers from operators in foreign jurisdictions utilise the poker room.

The poker room is controlled, operated, and domiciled in Antigua and Barbuda.

### 2.12.4 Control systems considerations for different types

#### 2.12.4.1 **Type 1 –Antiguan poker**

All control system guidelines are applicable.

#### 2.12.4.2 **Type 2 – associated poker**

In this arrangement the gaming operator and systems for the poker room are not regulated by the Commission. Nevertheless, the control system guidelines for the licence holder still apply, such as player identity verification, anti-money-laundering, player protection, security of deposits, privacy/information security, etc.



The management of the poker room by an associate does not absolve the licence holder obligations of assuring fairness to its customers, especially with regard to collusion.

Furthermore, risks associated with money laundering and the financing of terrorism are increased by this configuration therefore, the licence holder shall pay particular attention to **G 14 – Anti-money laundering – Guidelines** and that the Commission might require certification of the foreign control systems of the licence holder's business associates pursuant to r 103 of the Interactive Gaming and Interactive Wagering Regulations.

#### **2.12.4.3 Type 3 – hosting poker**

All control system guidelines are applicable.

While it is recognised that the external (non-Antiguan) operators deal directly with end customers, the **G 14 – Anti-money laundering – Guidelines** provide guidance relating to considering the control systems of business associates such as external (non-Antiguan) operators.

In addition to satisfying itself with regard to anti-money laundering and the prevention of terrorism financing control systems of the foreign business associates (external, non-Antiguan operators), the licence holder shall be satisfied the control systems are comparable to the Commission's requirements with regard to:

- a. protecting the vulnerable (prevention of problem gambling);
- b. fairness; and
- c. prevention of under-age participation in gambling.

The Commission might require certification of the foreign control systems of the licence holder's business associates pursuant to r 103 of the Interactive Gaming and Interactive Wagering Regulations.

#### **2.12.5 Gaming equipment & systems**

This section provides guidance of some key high-level guidelines. However, for completeness reference should be made to all control system guidelines.

##### **2.12.5.1 Network and communication security**

All gaming equipment and servers shall be housed in a physical environment approved by the Commission.

Firewalls with stringent and granular security rules at all entry points should be implemented.

Intrusion Detection Systems and anti-DDoS (distributed denial-of-service) protection should be strategically placed within the network and the network of upstream providers.

IP Geo-Location may be used to track poker bots, hackers, access from invalid jurisdictions, etc.

##### **2.12.5.2 Poker room system functionality**

Random table allocation is vital in both sit'n'go and multi-table tournaments (in order to avoid collusion by players sitting at both ends of the table or in some other supportive seating arrangement). However, random table allocation may be problematic to enforce on ring tables, as players prefer to choose their playing partners.



Player tracking and analysis by table/ time/ date to establish contemporary pairings shall be implemented.

Anti-chip dumping technology should consider or include player group analysis to match winner and loser pairings, common locations; statistical tracking to establish unlikely winner and loser hands, then pairings as above.

Verbose logging must be enabled on all security devices and servers that facilitate Bank and Credit Card data. Analysis of the logs and system statistics should be conducted regularly.

#### 2.12.6 Security and System Administration

Utilise timely Build/Patch processes; Change Control procedures and Incident Response Policies built on industry best practices.

Malicious Software Control – all systems should utilise Anti-Virus software.

Routinely test internal security systems and processes.

Regularly review and analyse system logs and system statistics.

Access should conform to a standard password policy.

All remote and administrative access must be over a secure channel (e.g. encrypted VPN link, dedicated private circuit, etc.)

Assign employee access to data on a need-to-know basis

Assign a unique ID to each person with computer access to data

Maintain the ability to track employee access to data through the use of unique IDs.

Change employee Passwords regularly.

Ensure employee security policy is understood by all your employees.

It is strongly suggested that two-person control is used to access encrypted data, e.g. whereby no one person holds all the keys or passwords necessary to open up access to data, particularly in respect of off-site backups and logs.

#### 2.12.7 Operational management

A Poker Room Manager shall be employed to ensure the poker tables are fairly played and free of collusion and fraud, at all times. The Poker Room Manager shall be a “key person” pursuant to the Interactive Gaming and Interactive Wagering Regulations.

The management of the poker room should be restricted to the poker room Manager and members of his or her team – as defined in the Organisational Chart. The Poker Room Manager’s team should have at their disposal, automated and sophisticated tools to detect errant player behaviour patterns over a period of time and multiple games/tables/tournaments. The Poker Room Manager should have access to player complaints data and chat logs, and/or to exception reports from these sources, in close-to-real time.

Access to the administrative areas of the system should be strictly controlled and monitored, to maintain an internal check on employees.

Collusion between players and gaming operation staff is a major concern, so there must be security procedures in place to ensure communication between staff and players is carefully monitored.

All processes and procedures concerning the poker room management should be supplied.



### **2.12.7.1 Player management**

Player activity shall be rigorously monitored by the licence holder at all times. Players will inevitably monitor each other and a process should be in place to deal with their complaints and feedback, and investigate accordingly.

A player cannot be allowed play at the same table with different accounts, or from the same PC. This and other fundamental rules should be stated in the terms and conditions.

#### **2.12.7.1.1 Client Disconnection**

It is possible, for many reasons, for the player to become disconnected from the poker server during a game e.g. internet connection outage, PC crash, etc. Client disconnections should not unnecessarily disadvantage the player. The licence holder's gaming equipment should implement defined rules (e.g. have the player go "all-in" if required to "call").

### **2.12.7.2 Table and game management**

All processes used for the management of tables and games should be described such as table creation, tournaments, tournament series, etc.

### **2.12.7.3 Rake and fees**

The amount of the rake taken by the licence holder should be clearly displayed and explained to the player. Any variation in the rake amount based on the table, limit amount, number of players, or pot-amount should be clearly displayed, as well as any additional fees (special entry fees, etc). Surcharges for making deposits with various payment methods (such as credit cards), should also be clearly stated.

### **2.12.7.4 Bonuses and promotions**

All bonuses and promotions should be clearly explained to the player. The rules must be readily-accessible with clear and unambiguous terms and conditions, especially where bonuses or promotions are limited to certain tables or non-tournament play, or other specific conditions apply.

### **2.12.7.5 Fraud prevention**

The inherent risk of cheating, fraud, and money laundering in poker rooms is greater than casinos. Consequently, the Commission expects to see more licence holder rigid control systems for poker rooms.

Detailed procedures dealing with collusion and fraud should be supplied. The procedures should describe any automated tools used to detect errant player behaviour patterns, and should consider player review over a period of time and many games, examining both deposit and withdrawal patterns, against age of account.

Fraud techniques are forever evolving to evade detection, therefore any automated tools should ideally be built to be as flexible as possible.

Privacy Policies will need to permit the sharing of player information between business associates for the purpose of controlling cheating, fraud and money laundering. However, information sharing shall not permit the crime of tipping off with regard to reporting suspicious or significant transactions.



#### 2.12.7.5.1 Player Collusion

Collusion refers to practice of two or more persons (players and/or gaming operation staff) working together to determine the outcome of, or relative ranking of hands in, a poker game.

Analysis of player behaviour should target collusion.

Chat Logs should be reviewed as required.

#### 2.12.7.5.2 Chip dumping

Chip dumping is the term used for a technique of moving chips from one player or players to another player or players in a deliberate manner.

Chip dumping provides an unfair advantage in tournament play, and may also be related to money laundering or payment fraud.

Analysis of player behaviour should chip dumping.

#### 2.12.7.5.3 Employee & player collusion

As customer support representatives (CSR) may have access to the hand history for all players (which can give an unfair advantage if relayed to certain players) it is vital that there are security procedures in place to ensure communication between CSRs and players is carefully monitored. For example, senior representatives who have access to the hand history of players should not have access to personal contact details of players, and conversely, CSRs who have contact with players should not have access to the hand history of other players.

Another important security measure is to make sure that hands-played so far are not available to anyone from the gaming operation, until they are fully finished, due to the risk of affecting the hand outcomes.

Finally persons with access to customer behaviour logs or information shall be prohibited from playing poker on the same network whether via the licence holder or not.

#### 2.12.7.5.4 Poker-bots

“Poker-bots” (“*poker robots*”) are software programs which connect to poker room servers pretending to be real players or playing with an optimised strategy. Thus bots have an advantage over human players.

Poker-bot software usually allows the player to participate in several games at the same time, which may be detected with the same IP-address being registered against multiple games. With IP Geo-location services, poker bots can be highlighted where multiple usage patterns arise from same geographic street address and city/town.

Site terms and conditions should stipulate, and make players aware, that the use of poker bots is not allowed and of the specific consequences to relevant players if they are used. Nevertheless, customers should be alerted to the potential of bot activity.

Procedures and processes of dealing with poker-bot software should be supplied, including any means of detection used and specific behaviour pattern/signatures that signal their use.

### 2.13 Player registration and account guidelines

**G 014 Anti-money laundering - Guidelines** take precedence over guidelines in this section.

#### 2.13.1 Agreement

Part of the registration process should be agreement to the terms and conditions of the application.



The customer can only advance to “cash” play if they take an action to acknowledge the agreement. This action should be logged in the system for evidentiary purposes.

#### 2.13.2 Verification

Customers should hold a valid account before commencement of gaming.

Customer access to a site will involve at least a user ID and password or PIN number. Any initial password or PIN will be issued securely to the player.

#### 2.13.3 Challenge questions

Customers shall be asked to provide identity and may be required to nominate challenge questions and answers at the time of registration.

The identity or challenge questions must be used by help-desk staff in the event the password or PIN is forgotten, say, to identify the person requesting access to the account or a change in password.

One challenge question may be randomly chosen and asked at the time of log-in to further reduce the possibility of a person other than the registered customer using an account.

E-mail requests for customer information should only be accepted with suitable confirmation of the sender's identity. The system should provide on-line account statements to registered customers.

#### 2.13.4 Under aged persons

Accounts may only be opened by persons over the age of 18 years.

#### 2.13.5 Controls over registration

Licence holders are permitted to use third parties to verify identity, age and place of residence provided that the licence holder has established a formal relationship with that third party prior to accepting verification advice. The relationship should be based on the following principles:

- a. the verification procedures used by the third party should be equivalent to those used directly by the licence holder;
- b. the verification procedures used by the third party should be audited by the licence holder on an ongoing basis and described in the approved control system of the operator;
- c. the licence holder should establish a separate relationship with each third party;
- d. the Commission is to be advised the details of each relationship and may require the licence holder to terminate a specific relationship at any time;
- e. the right of the Commission to determine that a relationship be terminated should be part of a relationship arrangement or agreement; and
- f. where a relationship is terminated in accordance with instructions from the Commission, all player registrations established as a result of that relationship should be authenticated again.

**G 014 Anti-money laundering - Guidelines** provides detailed control guidance with regard to business associates used in relation to customer identification.



### 2.13.6 Controls over accepting wagers

A licence holder should not permit a person to participate as a player in an authorised game unless the person is registered with the licence holder as a player.

A licence holder should not accept a wager from a player in an authorised game unless:

- a. a customer's account has been established in the name of the player and there are adequate funds in the account to cover the amount of the wager; and
- b. the funds necessary to cover the amount of the wager are provided in a way that is acceptable to the Commission.

### 2.13.7 Customer accounts

A new account for a person should not be created if the reason for the deactivation of a customer registration associated with previous accounts indicates that the person should not be permitted to establish another account.

Inactive accounts holding money in the system should be protected against illicit access or removal.

A customer shall only have one active account at one time within a given licence holder's system.

A customer is not permitted to hold multiple accounts or to transfer funds from one account to the other or to deposit from one credit card or account and withdraw to a different credit card or account, except where the different accounts are simply because of technical interface limitations between disparate systems (and then when there is only one account per system).

### 2.13.8 Security

Customer accounts on the system should be secured against unauthorised access or update other than by approved methods.

### 2.13.9 Customer activity statement

On request, a transaction report should display winnings, losses and duration of play for each day of the period requested, and totals of these details.

Apart from account statements that are to be available to the customer via the system, account statements should be sent to the registered address of the player or to the player's e-mail address (whichever is nominated by the customer as being acceptable), on request and on a regular basis - such regularity to be approved by the Commission.

Statements should include sufficient information to allow the customer to reconcile the statement against their own records to the session level.

Account statements should also identify details of major wins and losses. A major win or loss shall be defined by the licence holder but the lower threshold shall not exceed US\$1 000.

### 2.13.10 Player funds maintenance

The following principles should apply to the maintenance of customer funds:

- a. all deposit, withdrawal, transfer or adjustment transactions are to be maintained in a system audit log;



- b. a deposit into a customer account made using a credit card transaction should not be available for betting until such time as the funds are received from the card issuer or the card issuer issues an authorisation number to the licence holder indicating that the funds are available and the transaction is approved (the authorisation number is to be maintained in a system audit log);
- c. positive identification, including a secondary mechanism (eg, password and/or challenge question entry), should be undertaken before withdrawal of moneys held by the IGS can be made;
- d. a player should be able to withdraw funds up to the current balance of their account at any time (the computer system should not permit the withdrawal of funds in excess of the player's balance).

#### 2.13.11 Customer game session

Licence holders should give a customer an electronic identifier such as a digital certificate or an account description and a password to establish a session.

A session finishes if:

- a. the customer notifies the system that the session is finished (e.g. "logs out");
- b. a customer-inactivity timeout is reached;
- c. the balance of the customer's account reaches zero or is not sufficient to pay for another bet;
- d. the licence holder terminates the session under approved circumstances.



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G 009