


# Gaming Laboratories International



## *Evaluation and Certification Guide*



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## 1. About GLI

**Gaming Laboratories International**, hereafter referred to as GLI, has provided independent testing, inspection, certification and consultation services in the field of Gaming technology since 1989. GLI is the most dedicated private company in the world to provide these services to Gaming industry parties in regulated jurisdictions. GLI has successfully developed a business model able to meet the needs of regulators, manufacturers/suppliers and operators to provide the public with compliant Gaming products. Our position as the industry leader is tied to a proven record of accomplishment in meeting the requirements of our customers with impartiality and transparency.

GLI employs over 550 people worldwide with offices located in North America, South America, Europe, Africa, Australia and Asia. Our international team is comprised of technical, administrative, compliance, development and legal staff members demonstrating the highest degree of integrity and competence.

The cultural diversity and first-rate performance of our staff facilitates the regulation, testing, placement, management and control of technology in the Gaming industry worldwide. Our dedication to provide reliable services has earned GLI unparalleled international recognition and credibility in the Gaming world.

The process described in this document outlines the basic scheme GLI follows to provide independent certification of electronic and computer-based Gaming products used in regulated Gaming and Lottery jurisdictions. This process has been established through years of working with regulators, suppliers and operators in the industry. The information gathered and experience GLI gained has contributed to the successful management of compliance in Gaming and Lottery jurisdictions for over 20 years. GLI has been involved in developing and implementing technical standards and technical methods based on an understanding of the technology and its implementation in products used in the market. The feedback we received, the familiarity with the GLI process and the worldwide acceptance of GLI certification reports in the regulated Gaming markets have served to validate this process. GLI wishes to continue to refine and improve our services. Interested parties can contact GLI offices by mail, phone or through our website with recommendations, requirements, concerns or other feedback related to the core elements described in this scheme.

GLI hosts annual roundtable events to discuss issues important to our customers and the suitability of our service to them. We encourage participation from parties impacted by our services in the Gaming industry to help us to adapt our policies, evaluation processes, certification reports and other services to any changing needs within the industry.

Our goal is to exceed the expectations of the industry and our customers through ongoing improvement and by adapting our expertise to deliver the highest quality and value in all services GLI offers. Visit our website at [www.gaminglabs.com](http://www.gaminglabs.com).

### 1.1. Services Offered

GLI offers the following services: Independent Testing, Inspection, Certification, Forensic Analysis, Mathematical Analysis, Training, Auditing, Protocol Analysis and Consultation Services (i.e. Assistance in the development of technical standards to monitor gaming activity). These services are applied to the following devices, games and equipment:

- Gaming Devices in casinos
- Video Lottery Terminals (VLTs)
- Electronic Table Games
- Electronic Bingo and Keno devices and systems
- Finite scratch ticket and pull-tab systems
- Charitable gaming devices and systems
- Progressive systems/signs
- Internet Gaming Systems (Testing/Inspection only where legally permitted)
- Gaming Device peripherals (currency acceptors, printers, card readers, etc)
- Lottery Systems

**Note:** GLI maintains independence and impartiality in order to provide service as an accredited organization with the highest level of integrity. GLI cannot and will not engage in the production or design of products upon which we provide service.

A complete list of GLI service locations and addresses can be found [here](#) on our website.

### 1.2. Submitter Service Fees

GLI companies normally charge submitters an hourly fee for technical evaluation services and a flat fee for administrative work related to issuing reports for items evaluated. All fees and rates and pertaining to this work are available upon request. Fees related to specific projects can be obtained by contacting the GLI office performing the work.

### 1.3. GLI Standards

GLI has authored and published the following series of standards, which are widely accepted and used by gaming regulatory agencies. The latest versions of the GLI Standards series may be obtained by contacting us or downloading them from our website.

<b>GLI-11</b>	Gaming Devices in Casinos
<b>GLI-12</b>	Progressive Gaming Devices in Casinos
<b>GLI-13</b>	On-Line Monitoring and Control Systems
<b>GLI-14</b>	Finite Scratch Ticket and Pull-Tab Systems
<b>GLI-15</b>	Electronic Bingo and Keno Systems
<b>GLI-16</b>	Cashless Systems in Casinos
<b>GLI-17</b>	Bonusing Systems in Casinos
<b>GLI-18</b>	Promotional Systems in Casinos
<b>GLI-19</b>	Internet Gambling Environments
<b>GLI 20</b>	Redemption Kiosks
<b>GLI-21</b>	Server-Based Game Download Systems
<b>GLI-24</b>	Electronic Table Game Systems
<b>GLI-25</b>	Dealer Controlled Electronic Table Games
<b>GLI-26</b>	Wireless Gaming Systems

## 1.4. GLI Customers

GLI provides quality independent consulting, testing and evaluation services to manufacturers/suppliers, operators, and regulators within the gaming, wagering and lottery industries. GLI can evaluate and/or certify Gaming products against GLI standards or regulatory standards. GLI must be authorized by a regulatory agency or by regulatory statute to issue certification reports in regulated jurisdictions. Submitters with questions regarding the certification process should contact one of our offices or their development representative for more information.

### 1.4.1. Regulatory Customers

- **Gaming Commissions & Enforcement Agencies requiring a competent organization**
- **Lottery Commissions & Lottery Operators**
- **Pari-mutuel Wagering Commissions and Regulatory Agencies**

Services GLI provides to regulatory customers are:

- Assist with developing technical standards
- Perform on-site inspections of Gaming products used in their jurisdictions
- Provide evaluation and certification of Gaming products for compliance with their requirements
- Forensic evaluation of Gaming products

### 1.4.2. Non-Regulatory Customers

- **Manufacturers & Suppliers of Gaming products**

Services GLI provides to non-regulatory customers are:

- Third-party compliance evaluation (testing/inspection) of Gaming products
- Third-party compliance evaluation or analysis of Math or other Gaming data
- Independent functionality testing or inspection of Gaming products
- Certification of Gaming products that meet specified compliance/conformity requirements

## 2. Submission/Application Request

Submitters may request evaluation and certification of Gaming products using a GLI Submission Request Form or by sending in a request on company letterhead in conjunction with other forms, if needed. All requests must be signed by an authorized representative.

Since jurisdictional requirements vary, the submitter must specify the jurisdiction, regulatory market or standards against which testing and/or certification is requested. Please contact our office when submitting, if further clarification is needed.

Submitters are expected to have appropriate authorization to submit the products to submit products to GLI for evaluation. Evidence of this authorization must be provided to GLI, if requested.

The basic items needed for a submission are as follows:

<b>Submitter Information</b>	<i>Name, address, primary contact, etc.</i>
<b>Manufacturer Information</b>	<i>Name, address, primary contact, etc.</i>
<b>Submission Contents</b>	<i>ID Numbers, part numbers, Function</i>
<b>Testing Environment</b>	<i>ID Numbers or part numbers of items to be used during testing</i>
<b>Billing Information</b>	<i>Name, address, primary contact to whom the invoices need to be addressed</i>
<b>Jurisdiction(s) or Standards requested</b>	<i>Scope of evaluation or standards requested</i>

The submitter may also indicate any special requirements or provisions needed, such as translation or expected delivery times.

## **2.1. New Customers Submitting**

New submitters should contact the local GLI office where they intend to send their submission. A development representative will assist with the initial submission process to answer any questions. They will also ensure other information is provided regarding additional documents needed, required information or deposits, if necessary.

## **2.2. Existing Customers Submitting**

Existing submitters familiar with the submission process and requirements need only submit a signed letter or request form. GLI must be notified if there is any change in business contact information, legal status or ownership.

## **3. Types of Submissions & what to include**

Use the links below to visit our website for a detailed list of the submission requirements based on the type of product being submitted. Following an initial review of items submitted, GLI may require additional information, documents, software or other items to evaluate the product submitted.

[To Submit New Software](#)

[To Submit A New Machine](#)

[To Submit Modification Software](#)

[To Submit Hardware Modifications](#)

[GLI Technical Specifications For Random Number Generator Testing](#)

## **4. Terms of a Submission**

The submitter may reference the certification in advertising if both the submitter and the item(s) referenced remain compliant with all terms specified, as applicable.

The submitter may withdraw a submission by contacting the appropriate GLI office prior to the report being issued.

The submitter is responsible for the following:

1. Payment of all invoices related to testing, inspection or certification activity performed on the submission.
2. Notifying GLI if there are any changes to the organization or requirements.
3. Timely provision of any documentation or information needed to fulfill the request.
4. Ensuring any test, inspection or certification issued by GLI is only used in its original context and only for the product(s) referenced therein. Any alterations to the report will render it invalid.
5. Using the test, inspection or certification report issued by GLI only for the intended purpose and to not make any misleading claims that may misrepresent the product(s) identified in the report or claims that may bring GLI or the report into disrepute.
6. Discontinuing the use of a withdrawn, suspended or revoked certification or inspection report as evidence of product compliance or conformity.
7. Keeping a record of all complaints known to the submitter regarding the compliance of the certified product, taking appropriate action and documenting the actions taken as required. These shall be made accessible to GLI if requested.

## **5. Submission Process and Evaluation Overview**

When a submission is received, the products listed within the submission are evaluated or certified for conformity to a published standard as specified within the submission. As part of this process, the product(s) are sent to one of our Engineering departments for review. This initial review may involve the assignment of technical tasks to an authorized testing lab designated to perform the full evaluation.

The evaluation process generally includes various elements of Testing and Inspection work performed on items submitted. The completed results are checked by senior technical staff members prior to preparing, reviewing and issuing a report. The GLI certification committee safeguards the impartiality, reviews the efficacy and evaluates issues involving the suitability of GLI certification programs, processes or schemes during meetings that generally take place each quarter.

When an item requires a determination of its compliance with published standards, the results are evaluated against the requirements to determine if the product conforms prior to issuing a report. In these cases, GLI will only issue a report if a product is determined to conform to the appropriate standards or if an exception is made at the discretion of a regulatory agency. The report issued by GLI serves as evidence of a product's compliance or conformity with applicable regulations, requirements or standards. Each GLI company is legally responsible for their own work as specified in the terms & conditions of the report issued or other applicable written agreements. They work with personnel in other GLI companies and offices to coordinate the administration of certification documents and the status of products evaluated by GLI. Final decisions on certification are made by Quality Assurance and/or Compliance personnel.

GLI bases its decision to certify products on:

- Suitable submission request/application documentation as evidence of the submitter agreeing to the terms of certification
- Completed documentation technical forms, conformance criteria and result documentation from authorized testing or inspection bodies explaining product operation, product characteristics and containing statements attesting to its compliance with requirements
- Other evidence of compliance may be allowed or required on a case-by-case basis depending on the submission, documentation available and scope of the request

Products evaluated and previously approved by GLI companies prior to the revision date of this guide are considered compliant with GLI's certification scheme described herein provided the approval is current and they remain in compliant operation. However, to obtain and/or continue using the "Gaming Labs Certified" mark, products and suppliers must comply with any revised rules concerning the mark, since they may be necessary for acceptance in specific markets. Refer to [The "Gaming Labs Certified" mark](#) section of this guide for additional details.

In some cases, regulatory laws require additional verification, conformity certificates, or other certification documents for items to be fully approved. This may involve periodic retesting, inspection of products in operation, review of manufacturer marketing materials and a review of the manufacturing process. This may need to be determined based on regulations, the characteristics of the product and whether the "Gaming Labs Certified" mark is used. In most cases, a report issued from GLI will be sufficient but we recommend that the supplier contact any of our offices if clarification is needed regarding additional approval or certification requirements.

If a determination is made that a product does not conform to the appropriate standards, the submitter will be notified of additional options available and action that may be taken related to the request. Submitters may appeal our compliance determinations if they disagree with the findings. Please refer to [Appealing a Compliance or Certification Decision](#) in this document for additional information (section 9).

## **6. Stages of a Submission**

### **6.1. Receipt of the Submission**

The review of the initial submission ensures that all items required for the technical review are present. Submitters with Internet access can check the status of their submissions online via a secure login on our website.

GLI uses a unique project ID to categorize and track the status of each submission received electronically. We also maintain permanent records for all submissions processed along with the respective overall status of the project and its status within each jurisdiction requested.

There is generally one Project ID assigned per submission request. This is normal even when the request contains multiple items and specifies their evaluation against various requirements, regulations or standards. Refer to [Submission and Jurisdictional Status Indicators](#) for more information.

## **6.2. Job Allocation**

Senior technical staff members review the submission and assign the technical tasks and personnel necessary to perform an evaluation using methods appropriate to the product(s), regulations and requirements needed.

## **6.3. Technical Evaluation (Testing, Inspection, Math Analysis)**

Items submitted are verified, configured and evaluated by the technical staff members assigned and performed accordingly. All technical work involves a review and verification of any applicable documentation, source code, design specifications and modifications submitted. These will generally fall into one or more of the categories described below:

### **6.3.1. Software Evaluation**

This generally includes verification and testing of the following:

- Critical functions of a game such as control program functions, memory management, metering, error messages, communications, implementation of the RNG, advanced features, backward compatibility and control of peripheral devices
- Security methods and software authentication
- Payout tables, bonus game payouts, progressive support, and the functional operation of the software as it is integrated with the main program
- Graphic, sound, communication and other programs to determine if they function as intended and integrate properly with the main and personality programs
- Devices and displays to determine if they handle errors and other events properly without showing incorrect or misleading information

### **6.3.2. Hardware Evaluation**

This generally includes verification and testing of the following:

- Compliance and expected operating performance of an electromechanical device, its parts, or components within the game testing environment
- Security features, locks, doors and robustness
- Modifications to a machine or peripheral device
- Testing an entirely new Gaming machine, all related software and peripherals
- Device to device or device to system function of kiosks, printers, coin acceptors, bill acceptors, display terminals, card shufflers, top boxes and other hardware
- Compliance with specified EMC requirements \*

\* GLI will accept reports from recognized test laboratories accredited in the specified jurisdictions to perform the required EMC test methods. GLI may otherwise subcontract these tests to another appropriately accredited test laboratory, as needed. (Refer to the [Assignment of Test & Inspection Work](#) section)

### **6.3.3. Randomness, Probability and Fairness Testing**

Trained mathematicians, statisticians, programmers and engineering staff members perform methods related to mathematics, probability, inferential statistics and programming such as

- Randomness
- Probability and game strategy analysis
- Source code analysis

- Game rule analysis
- Actual and Theoretical Return to Player
- Volatility analyses

#### 6.3.4. Protocol, Progressive, Coin, Bill and Ticketing Evaluation

This generally includes verification and testing of the following:

- Proper implementation of protocol specifications
- Protocol compliance between devices, systems and peripherals
- Suitable error and event handling

#### 6.3.5. System Evaluation

System and Interoperability testing generally includes verification and testing of the following:

- Basic connectivity
- Messaging
- Error/event handling
- Ticketing (TITO)
- Accounting and other system reports
- Security and system logs

### 6.4. Technical and Administrative Review

All completed work is reviewed by senior technical staff members to ensure all procedures and tests were conducted, performed and documented accurately. Any abnormal conditions, results or nonconformities are documented and resolved with senior staff members, Technical Compliance personnel, Quality Assurance personnel and submitters.

### 6.5. Distribution of Reports and Updating

Finalized reports are sent to the submitter and regulatory or supplier customers then the status of the project is updated accordingly. Suppliers and regulators can access updated reports on the GLI website via their secure login.

### 6.6. On-site Inspection

GLI conducts on-site inspections to support regulatory compliance testing and certification work on Gaming products, online monitoring systems and associated equipment located in licensed facilities. The On-site inspection may be independent or may be part of the certification process as specified by regulatory guidelines or other requirements. This is often used to ensure product conformity is maintained while certified products are used in the field.

These inspections typically include device and system functionality verification of devices specified by the requesting party or by regulatory requirements. The scope of work is centered on the performance of specified devices, systems, software and other Gaming products in the field as evidenced by the following services:

- Initial startup of a licensed facility with new gaming machines and online systems
- Installation or upgrade of an online monitoring system
- Ongoing oversight inspections of modifications and expansion of Gaming facilities

#### 6.6.1. General Device Functionality

This generally includes but is not limited to verification of the following:

- Software Authentication
- Game Metering
- Coin/Bill Acceptance
- Accounting
- TITO
- Advanced Feature Functionality
- Local and Wide Area Progressive Functionality
- Error/Event Handling
- Security
- Communication with an Online System

### 6.6.2. System Functionality

This generally includes but is not limited to verification of the following:

- Software authentication
- Accounting
- Communication with devices
- System accounting reports
- Kiosk functionality

## 7. Submission & Jurisdictional Status Indicators

### 7.1. Overall Submission Status Indicators

The overall status of a submission is tracked using the following project status indicators:

Status	Explanation
<b>AP</b> – Approved	The project is completed and GLI has determined the product meets the compliance requirements for at least one jurisdiction listed in the request.
<b>CP</b> – Compliance	Specific issues involving the submission are being reviewed by the Technical Compliance department.
<b>NL</b> – Needs Letter	Report preparation work has begun. (Status is only used in U.S. locations.)
<b>NU</b> - Non-Mandatory Upgrade	All jurisdiction status indicators associated with the product are listed as NU. (Refer to the <a href="#">Non-Mandatory Upgrade</a> section)
<b>OH</b> – On Hold	Work on the item has been placed on hold pending action by GLI or the submitter.
<b>PN</b> – Pending	GLI is actively working on the project.
<b>PW</b> – Pending Withdrawal	An informal withdrawal notification received pending formal written notification.
<b>RJ</b> – Rejected	The submission was found to be noncompliant with the specified requirements.
<b>RV</b> - Revoked	Used only when all jurisdiction status indicators associated with the product are listed as RV. (Refer to the <a href="#">Revocation</a> section)
<b>WD</b> - Withdrawn	The submission was withdrawn from the evaluation or certification process.

### 7.2. Jurisdictional Status Indicators

The jurisdictional status of a submission is tracked using the jurisdictional status indicators below:

Status	Explanation
<b>AP</b> - Approval	Indicates that a report has been issued by GLI.
<b>CP</b> – Compliance	Specific issues involving the submission in the jurisdiction indicated are being reviewed by the Technical Compliance department.
<b>DR</b> – Draft	GLI has determined the item is compliant, but a secondary approval by the regulator or another authorized entity is still required.
<b>LQ</b> - Loto-Québec	Only used for the Loto-Québec jurisdiction to indicate a report was issued.
<b>MS</b> - Mississippi	GLI has determined the item is compliant, but a final decision to accept is required by the State of Mississippi.
<b>NU</b> - Non-Mandatory Upgrade	The jurisdiction has been notified that there is upgraded software available, however the upgrade is not mandatory for the jurisdiction specified. (Refer to the <a href="#">Non-Mandatory Upgrade</a> section)
<b>OH</b> – On Hold	Work on the item has been placed on hold in the specified jurisdiction pending action by GLI, the submitter or a regulatory agency.
<b>RA</b> – Request Approval	A request was submitted for the product to be evaluated for compliance in the jurisdiction specified and a report has not been issued.
<b>RJ</b> – Rejected	The submission was found to be noncompliant with jurisdictional requirements.
<b>RV</b> - Revoked	The approval/certification report for the item has been revoked in the specified jurisdiction. (Refer to the <a href="#">Revocation</a> section)
<b>WD</b> - Withdrawn	The specified jurisdiction has been withdrawn from the approval process for the product specified.

Suppliers, regulators and operators designated by their regulatory entities have access to submission and jurisdictional status information online via our website. Refer to the [GLI Access Online Access](#) section.

### **7.3. Change in a Submission or Jurisdictional Status**

GLI certification reports bear an implication of a certified product's continuing market/jurisdictional suitability and compliance with the standards indicated in the report. This applies regardless of whether the "Gaming Labs Certified" mark is used when referencing the product. A product's suitability can be identified by the individual jurisdictional status specified. For example, if an item has a jurisdictional status of AP, this is evidence that the product is suitable for use in the jurisdiction specified. GLI follows the process described in this section if certified products are discovered to be noncompliant with standards applicable to the certification.

Nonconformity can be identified by a source internal or external to GLI. GLI technical compliance staff members evaluate the discoveries and other notifications of noncompliant products with test engineers and other related parties to gain a clear understanding of the facts. They work with internal and external parties in the Gaming industry to facilitate the most appropriate action to be taken based on the facts. They also advise the parties involved of any recommendations, actions or decisions related to the compliance or certification of the product as needed. These may take the form of internal control or configuration recommendations in addition to changing the status of the item, when applicable. Notifications may be given by an advisory letter or by the issuance of a report containing the approval of a replacement product. Please refer to the following for information regarding the jurisdictional statuses that may be assigned to nonconforming products.

#### **7.3.1. Non-Mandatory Upgrade**

A 'Non-Mandatory Upgrade' (NU) status is used to indicate that a product may contain functional limitations or issues but is still capable of meeting the necessary compliance requirements to remain in use and to maintain a valid certification. When notice of a 'Non-Mandatory upgrade' is issued, the notification will identify any replacements if available, or indicate any internal controls that can be implemented to ensure compliant product operation.

This is commonly used when GLI has evaluated the release of an upgraded version of a product. In these instances, product modifications are not introduced to correct critical issues affecting the integrity of the product or its certification. Therefore GLI does not recommend products with this status be removed from the field. This is simply to provide notification that most users of the product would prefer a later version if it is made available. GLI normally recommends that any new installations of products with this status use the most recent version. Items specified as Non-Mandatory Upgrade are listed in a status report available on our website for future evaluations. GLI does not list (NU) Non-mandatory Upgrade and (AP) Approved items together in the status reports provided on our website.

#### **7.3.2. Revocation**

A 'Revoked' (RV) status is used to indicate that a product is found to contain deficiencies that could affect its capability to meet compliance requirements and maintain a valid certification. GLI recommends use of products with this status in the field be discontinued and will notify affected parties if a compliant replacement is available. This status may be used even in cases when there is a remote chance noncompliant operation will occur. If GLI has determined, that the potential risk caused by the deficiency is high or unknown, the product may be given an RV status. GLI reports for compliance or certification are no longer valid when a product has been assigned RV status unless supplemental information is presented that warrants other action to be taken. GLI lists items with an RV status on a revoked item status report available on our website. These items do not appear on approved or non-mandatory upgrade status reports.

Revocations are normally done in conjunction with the evaluation or certification of a replacement product, when possible. Revocations are issued via an advisory letter or similar notification sent to submitters and regulatory entities when no certified replacement is available or the severity of noncompliance prevents the use of an interim solution.

### 7.3.3. Extending a Certification

Once a revocation is issued, the nonconforming product is assigned the RV status. GLI may specify the number of days in which an item should be replaced or upgraded, if applicable. In some cases, GLI is given this information directly from the regulator.

## 8. Complaints

Any expressions of dissatisfaction with GLI products or services requiring a response are handled as complaints.

### 8.1. Handling Complaints

When GLI receives a complaint, the initial focus is to identify any areas contributing to a possible performance failure. This is followed up by taking the appropriate action determined by the management personnel in the organization to identify and correct the underlying causes. The immediate action taken by management seeks to ensure the customer is satisfied, where possible. Long-term resolution and service recovery is handled through our normal process of corrective and preventive action by using the complaints received as means to understand customer expectations and improve performance.

Depending on the issues involved, the aspects of a complaint may be treated as an appeal or as a business dispute. Complaints about compliance or certification decisions made by GLI are handled as appeals. All other issues involving complaints are handled as business disputes.

## 9. Appealing a Compliance or Certification Decision

An appeal is a request made by a submitter for GLI to reconsider a decision made that a product does not meet compliance or certification requirements.

Appeals:

- Apply only to compliance or certification decisions made following the evaluation of a product
- Apply only to those submitting products for evaluation (Regulators may choose to accept or deny a product in their respective jurisdictions regardless of the determinations made by GLI)
- Are normally resolved internally
- May only be resolved through third party arbitration where specified in the appeal process.

### 9.1. The Appeal Process

When GLI determines a product does not meet the necessary compliance requirements to pass an evaluation or issue a certification, the submitter can contest the findings by making a written appeal to GLI. This initiates an internal review to ensure the submitter has received fair treatment and competent service following unfavorable decision, while keeping the decision independent. Regulatory entities generally do not use this process as they have final authority to allow or deny a product in their respective jurisdictions regardless of the determinations made by GLI.

Although an appeal should be submitted to the appropriate GLI director, any person within the organization can receive an appeal, which is then referred to the appropriate director for review. Appeals in the U.S. are forwarded to the Senior Director of Technical Compliance and Quality Assurance for final determination. Outside of the U.S., appeals are forwarded to the appropriate managing director or designated management staff member for a determination.

During the review of an appeal request, appropriate staff members in the organization will assist in gathering the facts needed to facilitate a final determination. Following a thorough evaluation of the appeal request and any related facts, GLI will notify the submitter of the outcome. GLI will also inform the submitter of any further internal action taken to remedy the situation, if required. If the determination is still unfavorable, GLI accepts no further appeals unless new evidence is presented or discovered that may result in the reversal of an unfavorable decision. Procedures for handling internal nonconformity are followed, if required. GLI responds to appeals within 30 days of receipt.

If a submitter disagrees with a determination of compliance made by GLI, the submitter can take the matter directly to a regulatory authority. Examples of appropriate regulatory authorities are Gaming/Gambling Commissions, Ministries Governing Financial, Casino or Gaming Supervision and State Gaming Agencies. Regulatory agencies are generally the final decision-making authority related to the compliance or conformity of a product in their respective jurisdictions.

GLI may also contact regulatory authorities for a compliance determination in cases where jurisdictional regulations are unclear, silent, or do not specifically address the characteristics, features, or technology of an item submitted. This is applicable provided it does not compromise our impartiality and the submitter wants to proceed. The right to appeal directly to an independent arbiter directly or following GLI's internal review is only allowed in Hong Kong and shall be submitted to the Hong Kong International Arbitration Centre and administered in accordance with the rules and regulations of the HKIAC. Further information can be found at [www.hkiac.org](http://www.hkiac.org).

## 10. Business Disputes

Any disagreement between GLI and a customer, that is not an appeal, is considered a business dispute.

Business disputes:

- Include traditional business issues such as billing, timeliness, quality of work, etc.
- Apply to any service performed by GLI
- May be resolved internally or through third party arbitration

### 10.1. Handling Business Disputes

GLI attempts to resolve business disagreements with customers directly through the appropriate communication channels specified by senior management. GLI will also review any related personnel, documents or records needed to help reach a satisfactory resolution.

Anyone in the organization receiving information related to a dispute over GLI services must notify a Director and take the prescribed action. Billing disputes are handled by Senior Management and accounting personnel. Other disputes involving legal action are forwarded to a Director or the organization's appropriate legal counsel for handling in accordance with the procedures described herein or similar.

Business disputes that cannot be resolved directly with a customer related to the services performed by GLI, or the breach, termination or validity thereof, the parties agree to submit the dispute to a sole mediator selected by the parties or, at any time at the option of either party, to mediation by the American Arbitration Association ("AAA").

## 11. Arbitration

The AAA has experience in dispute resolution for matters involving U.S. and international trade. Additional information is available on their website [www.adr.org](http://www.adr.org).

**Note:** Arbitration related to products evaluated or certified for use in Hong Kong may also be addressed by The Hong Kong International Arbitration Centre [www.hkiac.org](http://www.hkiac.org)

If not thus resolved, it shall be referred to a sole arbitrator selected by the parties within thirty (30) days of the mediation, or in the absence of such selection, to final and binding arbitration by a sole arbitrator under the Rules of Conciliation and Arbitration of the International Chamber of Commerce in effect on the date of this Agreement, except that in the event of any conflict, this Agreement to mediate and arbitrate shall govern. The mediation and arbitration shall be at the headquarters of GLI in Lakewood, Ocean County, New Jersey, USA, at an alternate GLI office or other location agreeable to both parties.

Any award made (i) shall be a bare award limited to a holding for or against a party and affording such remedy as is deemed equitable, just and within the scope of the Agreement; (ii) shall be without findings as to issues (including but not limited to patent validity and/or infringement) or a statement of the reasoning on which the award rests; (iii) may in appropriate circumstances (other than patent disputes) including injunctive relief; (iv) shall be made within four (4) months of the appointment of the arbitration; and (v) may be entered in any court.

The requirement for mediation and arbitration shall not be deemed a waiver of any right of termination under this agreement and the arbitrator is not empowered to act or make any award other than based solely on the right and obligations of the parties prior to any such termination.

The arbitrator shall be knowledgeable in the law and technology of the agreement and shall determine issues or arbitrability, but may not limit, expand or otherwise modify the terms of the agreement.

The Agreement shall be interpreted in accordance with the U.S. Law and the laws of the State of New Jersey, U.S.A., exclusive of its conflicts of law provisions.

Each party shall bear its own expenses but those related to the compensation and expenses of the mediator and arbitrator shall be borne equally.

A request by a party to a court for interim measures shall not be deemed a waiver of the obligation to mediate and arbitration.

The arbitrator shall not have authority to award punitive or other damages in excess of compensatory damages and each party irrevocably waives any claim thereto.

The parties, their representatives, other participants and the mediator and arbitrator shall hold the existence, content and result of mediation and arbitration in confidence.

## 12. Additional Information

### 12.1. Online Access

GLI provides submitters, regulators and authorized parties with access to approval reports, downloads, verification utilities and other information relevant to their products and jurisdictions online via our website using a secure login. GLIACCESS® is available to GLI customers free of charge by contacting our office.

### 12.2. Verification Tools

GLI uses the following utilities to generate signatures such as CRC-16, CRC-32, MD-5 and SHA-1 for purposes of software authentication and verification:

- GLI VERIFY®
- GLI SFCK
- Kobetron™
  - GI-3000
  - GI-4000
  - LT-400
  - RD-700

Other verification tools and/or methods may be used if required or authorized by regulatory requirements.

### **12.3. Device and Data Storage**

All GLI facilities have adequate space for storing and protecting Gaming machines regardless of whether they are currently under test. Our facilities have procedures to control machine inventory and handling. Software media is stored in a secure location within GLI facilities, which is monitored 24 hours a day seven days per week. Access to these storage locations is limited to certain GLI personnel. All submitted software is categorized and tracked by the submission assigned to the project and the software ID.

### **12.4. Confidentiality and Protection of Information/Data**

GLI maintains a strict privacy policy and adherence to procedures intended to protect our organization and our customers. All records relating to testing, inspection or other evaluations are the confidential property of GLI. These records are only shared with other GLI companies except where required by legal statute, contractual agreement or a management directive. GLI does not permit third-party disclosure of customer confidential information without taking appropriate precautionary measures as directed by our General Counsel. Regulatory customers may review records relevant to work performed on their behalf on-site during normal hours of operation. Submitters may review records specifically related to their submissions on-site during normal hours of operation.

In addition to conducting routine employee background checks, GLI equips its computer systems and facilities with security and monitoring equipment to prevent unauthorized access to records. All GLI facilities are equipped with the necessary security access control and monitoring to prevent access by unauthorized individuals. Network and computer access is controlled and monitored by the IT department.

Feel free to contact us if further information is needed regarding our policies and procedures.

### **12.5. Assignment of Test and Inspection Work**

GLI may assign work to other GLI companies or branch offices with suitable competency as evidenced by an evaluation or by the existence of a comparable industry accreditation covered by a mutual recognition agreement.

Both suppliers and regulators have identified this as an appealing trait of GLI to provide them with the highest level of service. This practice also helps to maintain effective workload balancing and to ensure staff members having the most experience with the particular customer, product or jurisdiction are used whenever possible. It also provides customers with a broader knowledge base, support in multiple time zones, and support in multiple languages.

The GLI office responsible for the work communicates the work request requirements to the responsible parties at the location performing the work to ensure adequate resources are available to satisfy the request.

On-site inspection work is generally not subcontracted to non-GLI companies. Some exceptions may exist in cases where the inspecting organization is authorized or specified by the jurisdiction, regulatory requirement or other arrangements made between GLI, the customer and the Inspection Body. GLI may augment the staff members on site with trained personnel who are employed on a contractual basis, if needed. Any person retained in this capacity is subject to all normal requirements and responsibilities related to their work. This includes background screening, training, work supervision and confidentiality agreements.

Should GLI subcontract work to another laboratory, such as EMC and/or safety testing, the laboratory must be evaluated to perform accredited work appropriate to the requirements. GLI identifies these service providers and maintains records of their evaluations.

GLI cannot and does not subcontract certification responsibilities to other companies, including other GLI offices. The office responsible for the certification is established during the submission receipt or review of the request. This is commonly the case when a request for multiple jurisdictions is submitted to the office performing tests but not issuing reports for all of the jurisdictions listed in the request.

## 12.6. GLI Logos, Images and Trademarks

GLI logos, "GAMING LABS CERTIFIED", "ASK THE GAMING LAB", "GLI VERIFY", "GLIACCESS", "GLI UNIVERSITY", "WHERE THE GAME BEGINS" and other marks are registered trademarks, trademarks, or service marks of Gaming Laboratories International, LLC (GLI), at 600 Airport Road, Lakewood, NJ, U.S.A. The absence of a name or logo in this list does not constitute a waiver of GLI's intellectual property rights.

All GLI trademarks are protected under U.S. and International trademark agreements. Use of any GLI images, logos and any other GLI registered trademark is prohibited without express written permission from GLI. GLI logos and trademarks may not be used to endorse, promote or suggest in any way that GLI holds any interest in the development of Gaming products. Do not use the GLI logos on or in connection with products, packaging, manuals, promotional or advertising materials, or websites for any purpose without express written authorization from GLI. Do not use GLI marks in a manner that implies GLI has any legal affiliation with your company.

With the exception of the "Gaming Labs Certified" mark, GLI trademarks may not be used in any manner that expresses or implies affiliation, sponsorship, endorsement, certification, or approval. Use of the "Gaming Labs Certified" mark is authorized as specified in this document. Refer to the ["Gaming Labs Certified" mark](#) conditions of use for more information.

## 13. The "Gaming Labs Certified" mark

### 13.1. General Information

The "Gaming Labs Certified" mark is a registered trademark of Gaming Laboratories International, LLC for use on products and related literature that have been certified for conformity by authorized GLI companies. Use of the mark signifies that the associated certified products have met the required standards following an evaluation by GLI. The technical and operational procedures GLI uses are reviewed for compliance in accordance with recognized international standards for quality and competence. The mark is intended to convey confidence to industry by certifying the compliance of the products following the evaluation. It should also convey a commitment on the part of GLI and the user of the mark to take measures necessary to ensure certified products remain compliant with specified requirements.

A stylized version of the mark is shown below as an example:



The GLI Marketing Department is based in the Las Vegas, Nevada location. They handle the administration involved in controlling and issuing the "Gaming Labs Certified" mark based on the information received from offices issuing certification reports and direction from legal counsel. This helps to ensure a consistent branding and better control via a single department that reports directly to the President at GLI World Headquarters. This also helps to improve the validity involved in our certification process by taking a global approach to risk management associated with using the mark. The GLI company responsible for the certification report must monitor their certifications and notify the Marketing Department when it is appropriate to issue or deny use of the mark. Personnel employed by GLI companies assist the Marketing Department and other departments perform any activities required to facilitate this process (i.e. Inspection, Testing, Research, Document Review, etc.).

GLI shall not refuse to authorize use of the mark to any entity except in cases where there is a failure to meet any of the requirements for obtaining the "Gaming Labs Certified" mark. There shall be no fee to use the "Gaming Labs Certified" mark once issued to the supplier.

For those suppliers with equipment previously evaluated by GLI, a transfer may be requested for a certification against other applicable standards against which GLI can issue certification reports.

Once granted, use of the “Gaming Labs Certified” mark may not be transferred or assigned to a third party without entering a new agreement or without written consent from Gaming Laboratories International, LLC in certain unique situations. Requests for such consent must be made to GLI in writing and will be reviewed on a case-by-case basis.

Unless otherwise indicated, use of the “Gaming Labs Certified” mark is indefinite for compliant products certified by GLI, provided the user adheres to the Conditions for Use. GLI may extend any applicable finite period of use, as in cases where products must be recertified. Such extensions may be granted if GLI is unable to recertify products through no fault of the user or if suitable arrangements are made between the user and GLI in writing.

GLI maintains an electronic register of all authorized users of the “Gaming Labs Certified” mark for review at the World Headquarters location in Lakewood, NJ. This register contains the user information along with the relevant standards and product information under which the authorization to use the certification mark was originally granted. Interested parties, including the public, should submit any requests to review this information in writing to GLI, 60 business days prior to the date of review unless other arrangements, required by law or agreed to by GLI. Any such requests must be acknowledged by a GLI Officer or Managing Director.

GLI submits official copies of the rules regarding the use the “Gaming Labs Certified” mark to the official Trademark Registrars or other authorized regulatory entities in various countries. Where required by the regulatory statute in a country, GLI provides advanced notification or submits a request for consent to amend the rules. No amendment to the rules is applicable or becomes official in these countries until or unless the changes are accepted by the appropriate authority. GLI will identify any amendments pending the consent of a Trademark Registrar in a separate document on the same web page containing the form to request the use of the “Gaming Labs Certified” mark. This document will identify sections and content containing the proposed amendments along with the countries where the consent to implement them is still pending. GLI provides users and stakeholders with advanced notice of any proposed changes to the GLI certification process or the rules governing the use of the mark prior to implementing or requiring compliance. Changes to the process and rules are available to interested parties upon request.

In Hong Kong, the only officially recognized rules regarding the “Gaming Labs Certified” mark are those accepted and approved by the Hong Kong Registrar of Trade Marks. They comprise the complete set of rules governing the authorization of suppliers to the use the “Gaming Labs Certified” mark in their entirety. Any amendments to the rules are not effective in Hong Kong until they are formally accepted by the Hong Kong Registrar of Trade Marks.

### **13.2. Obtaining the Mark**

GLI will grant use of the “Gaming Labs Certified” mark to organizations who have submitted items that a GLI company has determined to meet all of the conformance criteria in an applicable GLI Standard(s) or other published regulatory requirements.

Requests for use of the “Gaming Labs Certified” mark must be submitted in writing or via the electronic request form provided on our website.

The entity making the request must generally be the owner or must be able to provide proof of authorization to use or exercise intellectual property rights over an item certified by GLI.

The requesting party must be able to provide any necessary reference information needed to confirm the validity of a GLI certification related to an item (i.e. a report or ID number of the item).

The requesting party must also agree to abide by the Conditions for Use and must have the intended placement of the mark reviewed by GLI prior to use.

Additional information assistance is available by calling one of our offices or by contacting us through our website.

### 13.3. Conditions for Use

Those wishing to use the “Gaming Labs Certified” mark must have their products evaluated by an authorized GLI company for compliance against a set of documented or published requirements. These include, but are not limited to standards such as those listed in the “[GLI Standards](#)” section of this manual, on the GLI website or specified by a regulatory agency. GLI anticipates that it will create additional standards as well as update the current standards to match suitability and fit-for-use needs of the gaming and wagering industry as new technology is introduced. The full list of current applicable GLI standards published by GLI is available at [www.gaminglabs.com](http://www.gaminglabs.com).

To obtain and continue to use the “Gaming Labs Certified”, the requesting party must agree to the following conditions:

- To permit GLI access to any additional documentation, copies of original documentation, and any other records deemed necessary to fulfill the request and verify the validity of a certification
- To allow GLI to observe the manufacturing process of products certified by GLI annually
- To ensure that the specifications of the item bearing the “Gaming Labs Certified” mark remain unaltered and notify GLI if any such changes are made
- To use the mark on or in reference only to the specific items certified by a Gaming Laboratories International company and the standards applicable to their certification
- To follow the approved placement guidelines when using the mark
- To maintain records of any customer complaints related to items certified
- To cease using the “Gaming Labs Certified” mark in accordance with any applicable Termination of Use Guidelines
- To notify GLI if any deficiencies are discovered that may have an adverse affect on the validity of a certification
- To ensure any test, inspection or certification document issued by GLI is only used in its original context, for its intended purposes and only for the product(s) referenced therein
- To make no false or misleading claims that may misrepresent the product(s) or content identified in a GLI test, inspection or certification document that may bring GLI or the report into disrepute

### 13.4. Placement Requirements

GLI must verify and approve the placement and any manner in which the “Gaming Labs Certified” mark is used. GLI will confirm the accuracy of the specific GLI standard(s) under which the user claims certification. Artwork may be obtained from GLI Las Vegas, 7160 Amigo Street, Las Vegas, Nevada 89119, USA – Attention: Marketing. Placement of the “Gaming Labs Certified” mark shall indicate under which standard it was certified.

The “Gaming Labs Certified” mark may not be placed in a sentence, boxed or otherwise confined within a border, rotated or placed on an angle, enlarged or otherwise modified from its original state as licensed except as provided by the terms of this agreement.

### 13.5. Trademark Acknowledgement

When specified, users must include specific acknowledgment whenever the “Gaming Labs Certified” mark is used. This acknowledgement is important as it reminds competitors, licensees, customers and others that Gaming Laboratories International, LLC claims exclusive rights to the mark and its usage. The correct acknowledgment is:

***The “Gaming Labs Certified” mark is a registered trademark of Gaming Laboratories International, LLC in the United States and other countries.***

### **13.6. Monitoring and Supervision**

GLI takes the use of all of its trademarks, service marks and certification marks seriously. Efforts to monitor the use of these marks include but are not limited to the following:

- Attendance at worldwide tradeshows to observe all uses of the “Gaming Labs Certified” mark
- Reviewing trade publications and consumer publications in addition to commercial and non-commercial Internet websites for all uses of “Gaming Labs Certified” mark
- Requesting employees to report on uses of “Gaming Labs Certified” mark during routine worldwide inspections or observation of gaming equipment placed in service

### **13.7. Termination of Use Guidelines**

GLI shall have the right by notice in writing to the authorized user to terminate their rights to apply the “Gaming Labs Certified” mark forthwith upon any of the following events:

#### **13.7.1. Breach of Conditions**

The certified user has breached one or more of the regulations and the breach is not remedied within 30 days of service of written notice specifying the breach by GLI.

#### **13.7.2. Unsuitable Authorized User**

The authorized user:

- Has ceased trading, becomes insolvent and/or
- Has a receiver, administrator, trustee, liquidator or similar officer appointed over the whole or any substantial part of its assets, and/or
- Has a resolution to wind up passed (other than for the purposes of amalgamation or reconstruction) and/or
- There is a court order for winding up made against and/or
- There is a resolution passed or a court order is issued placing it into liquidation

A GLI company has made notice to the user that the item(s) no longer meets the applicable standards against which the certification was issued and that such certification is REVOKED, due to facts discovered after said certification. Gaming Laboratories International, LLC provides no less than 60 days to the supplier to cure any documented deficiencies that cause to the certified product to be, in fact, not in compliance.

### **13.8. Unauthorized Use**

GLI intends to protect its interests, reputation, and commitment to quality testing inspection and certification services. As such, GLI will aggressively seek to enforce its exclusive rights to the “Gaming Labs Certified” mark under U.S. and International laws governing the use of trademarks. GLI will seek court ordered injunctions, penalties, damages and other legal remedies for violations or perceived violations of the usage of its registered trademarks. This pertains to usage of the actual mark itself or a similar mark that may mislead or confuse a reasonable person into believing that GLI has certified or otherwise approved an item when it has not.

## **14. Description of Other Related Services**

GLI also provides additional services to parties within the Gaming industry that are related to our certification work but independent of the certification process. GLI does not provide certification reports for the services listed below. GLI also makes no claims that these services will expedite or guarantee the approval of any current or future submissions.

### **14.1. Consultation**

GLI is often retained in a consultant capacity to assist regulators with the auditing process, drafting of rules and technical standards regarding gaming devices, associated equipment, gambling devices, internal controls, rules of the game, conduct of gaming or in any other area assistance is requested.

The experience GLI has accumulated in its many years of providing technical compliance consulting services first starts with identifying proper and definitive technical standards that gaming equipment must meet to adhere to public policy and provide protection to the playing public. Technical standards are the baseline for which gaming regulators can enforce rules and regulations to protect and uphold the integrity of gaming in each venue.

#### **14.2. Training**

GLI firmly believes that for gaming jurisdictions to regulate their respective operations effectively, they must have the most up-to-date information available about gaming devices, computer systems and hardware/software located on casino floors for public play. To assist in that endeavor, GLI offers training both at our offices and in the field.

#### **14.3. Forensic Evaluation**

Forensic evaluation services are available to regulatory entities requesting independent analysis of device malfunctions or questionable game operation within a Gaming facility.

This requires the work of a senior engineer or technical expert with demonstrated competence and expertise on the device in question. Engineers performing forensic analysis services will work in conjunction with technical compliance personnel to identify, include or exclude any items of relevance to the investigation and subsequent report.