

No.	CS01
Version No.	1.3
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Sweden Online Gambling Systems Certification Scheme

1 Introduction

Swedish Gambling Authority (SGA) requires the online gambling operators to get their online gambling systems certified against SGA's regulations and technical requirements in accordance with ISO/IEC 17065 standard (ISO 17065). This includes testing and inspection of online games (including random number generators (RNG)), gambling systems, and security assessment of gaming operations.

Gaming Associates Group of companies comprises of Gaming Associates AB (ga) and Gaming Associates Europe Limited (GA EU).

GA EU provides compliance testing and inspection services to the online gambling jurisdictions around the world. GA EU is accredited for ISO/IEC 17025:2005 (ISO 17025) for testing online games (including RNG) and gambling systems. GA EU is also accredited for ISO/IEC 17020:2012 (ISO 17020) for inspection of online games and gambling systems by UKAS. The following reports are provided by GA EU:

- 1. Test reports for online games, RNG, and gambling system as per ISO 17025
- 2. Inspection reports for online games and gambling system as per ISO 17020

ga, as an ISO 17065 certification body, performs the following certification activities against SGA's regulations and technical requirements in accordance with ISO 17065 standard.

- 1. Perform security assessment as per ISO17065
- 2. Review test reports issued by GA EU or another ISO 17025 accredited test laboratory
- 3. Review inspection reports issued by GA EU or another ISO 17020 accredited inspection laboratory
- 4. Decide on certification and issue certification

The details of the certification scheme for online gambling systems are provided below.

1.1 Online gambling systems certification scheme

1.1.1 Scope of certification scheme

Swedish Gambling Authority (SGA), the gaming regulator in Sweden, has issued regulations and general advice on technical requirements and accreditation of bodies for inspection, testing and certification of gambling service providers. These regulations require inspection, testing and certification against SGA regulations in accordance with ISO 17065.

The certification is performed against the following SGA regulations and technical requirements:

- The Swedish Gambling Act (SFS 2018:1138);
- The Swedish Gambling Ordinance (SFS 2018:1475);

Author	Approved by	Dogo 1 of 11
Quality Manager	CEO	Page 1 of 11



No.	CS01
Version No.	1.3
Date	2019-10-08

Sweden Online Gambling Systems Certification Scheme

- The Swedish Gambling Authority's regulations and general advice on technical requirements and accreditation of bodies for inspection, testing and certification of gaming service providers (LIFS 2018:8);
- The Swedish Gambling Authority's regulations and general advice on state lotteries and lotteries for matters of public interest (LIFS 2018:4), and
- The Swedish Gambling Authority's regulations and general advice on responsible gambling (LIFS 2018:2).

1.1.2 Type of ga certification scheme

The following certification scheme, Type 6 scheme for certification of services and processes based on ISO/IEC 17067:2013 (ISO 17067), has been selected for certification of online gaming systems against SGA regulations.

Scheme Owner: The Swedish Gambling Authority

	Conformity assessment functions and activities	Type 6 Certification scheme
I	Selection , including planning and preparation activities, specification of requirements, e.g. normative documents, and sampling, as applicable	Х
II	Determination of characteristics, as applicable, by: a) testing b) inspection c) design appraisal d) assessment of services or processes e) other determination activities, e.g. verification	х
III	Review Examining the evidence of conformity obtained during the determination stage to establish whether the specified requirements have been met	х
IV	Decision on certification Granting, maintaining, extending, reducing, suspending, withdrawing certification	
V	Attestation, licensing a) issuing a certificate of conformity or other statement of conformity (attestation)	х
	b) granting the right to use certificates or other statements of conformity	х
	c) issuing a certificate of conformity for a batch of products	
	d) granting the right to use marks of conformity (licensing) is based on surveillance (VI) or certification of a batch.	х
V!	Surveillance, as applicable (see 5.3.4 to 5.3.8 of ISO17065:2013), by:	
	a) testing or inspection of samples from the open market	

Author	Approved by	Page 2 of 11
Quality Manager	CEO	Page 2 of 11



No.	CS01
Version No.	1.3
Date	2019-10-08

Sweden Online Gambling Systems Certification Scheme

ĺ	Conformity assessment functions and activities	Type 6 Certification scheme
	b) testing or inspection of samples from the factory	
	c) assessment of the production, the delivery of the service or the operation of the process	Х
	d) management system audits combined with random tests or inspections	Х

This scheme (Type 6) is applicable to certification of services and processes. Although services are considered as being generally intangible, the determination activities are not limited to the evaluation of intangible elements (e.g. effectiveness of an organisation's procedures, delays and responsiveness of the management). In some situations, the tangible elements of a service can support the evidence of conformity indicated by the assessment of processes, resources and controls involved.

For both services and processes, the surveillance part of this scheme includes applicable audits of the management system and assessment of the services or processes.

1.1.3 Certification system

SGA has identified the sections of regulations which require assessment, testing and/or inspection and certification as follows:

Section of SGA regulations LIFS 2018:8	Alternative A: Accredited for	Comment for A (Output)	Alternate B: Accredited for	Comment for B (Output)
Chapter 4 Information security	ISO/IEC 17021-1 and ISO/IEC 27006	ISO 27001 certificate	ISO/IEC 17065	Carried out as a management system assessment (ISO/IEC 17021-1). Certificate issued*
Chapter 5 Risk and vulnerability management	ISO/IEC 17021-1 and ISO/IEC 27006	ISO 27001 certificate	ISO/IEC 17065	Carried out as a management system assessment (ISO/IEC 17021-1). Certificate issued*
Chapter 6 System changes	ISO/IEC 17021-1 and ISO/IEC 27006	ISO 27001 certificate	ISO/IEC 17065	Carried out as a management system assessment (ISO/IEC 17021-1). Certificate issued*
Chapter 7 Functions for game administration	ISO/IEC 17025	Test report to show that the functions exist.	ISO/IEC 17065	Carried out as testing activity (ISO/IEC 17025). The result is reported in an appendix to the certificate*

Author	Approved by	Page 3 of 11
Quality Manager	CEO	Page 3 01 11



No.	CS01
Version No.	1.3
Date	2019-10-08

Sweden Online Gambling Systems Certification Scheme

Section of SGA regulations LIFS 2018:8	Alternative A: Accredited for	Comment for A (Output)	Alternate B: Accredited for	Comment for B (Output)
	ISO/IEC 17020	Inspection report to show that the functions work.		
Chapter 8 Information that a gambling system must be able to generate	ISO/IEC 17025	Test report to show that the functions exist.	ISO/IEC 17065	Carried out as testing activity (ISO/IEC 17025). The result is reported in an appendix to the certificate*
	ISO/IEC 17020	Inspection report to show that the functions work.		
Chapter 9 Functional requirements in relation to the players	ISO/IEC 17025	Test report to show that the functions exist.	ISO/IEC 17065	Carried out as testing activity (ISO/IEC 17025). It can alternatively be done as a control activity under ISO/IEC 17065. The result is an integral part of the certificate*
	ISO/IEC 17020	Inspection report to show that the functions work.		
Chapter 10 Repayment process	ISO/IEC 17025	Test report to show that the functions exist.	ISO/IEC 17065	Carried out as testing activity (ISO/IEC 17025). The result is reported in an appendix to the certificate*
	ISO/IEC 17020	Inspection report to show that the functions work.		
Chapter 11, Section 4 Game play instructions,	ISO/IEC 17025	Test report to show that the functions exist.	ISO/IEC 17065	Carried out as testing activity (ISO/IEC 17025). The result is reported in an

Author	Approved by	Dogo 4 of 11
Quality Manager	CEO	Page 4 of 11



No.	CS01
Version No.	1.3
Date	2019-10-08

Sweden Online Gambling Systems Certification Scheme

Section of SGA regulations LIFS 2018:8	Alternative A: Accredited for	Comment for A (Output)	Alternate B: Accredited for	Comment for B (Output)
payout table and pot				appendix to the certificate*
	ISO/IEC 17020	Inspection report to show that the functions work.		
Chapter 12 Abnormal gambling patterns and cheating	-	Not included	-	Not included
Chapter 13 Functional requirements for random number generators (All parts)	ISO/IEC 17025	Test report to show that the functions exist.	ISO/IEC 17065	Carried out as testing activity (ISO/IEC 17025). The result is reported in an appendix to the certificate*
Chapter 14 Agent terminals	ISO/IEC 17020	Inspection report to show that the functions work.	ISO/IEC 17065	Carried out as a control activity under ISO/IEC 17065. The result is included in the certificate*
Chapter 15 Functional requirements for online games (Introduction)	ISO/IEC 17020	Inspection report to show that the functions work.	ISO/IEC 17065	Carried out as a control activity under ISO/IEC 17065. The result is included in the certificate*

Section of SGA regulations LIFS 2018:4	Alternative A: Accredited for	Comment for A (Output)	Alternate B: Accredited for	Comment for B (Output)
Chapter 4 The properties of physical lottery tickets	ISO/IEC 17025	Test report of the physical lottery tickets' compliance with the requirements in Chapter 4.	ISO/IEC 17065	Carried out as testing activity (ISO/IEC 17025). The result is reported in an appendix to the certificate*

^{*}The certificate is provided by a product certification body and includes all requirements set out in the Swedish Gambling Authority's regulations, as specified in the guide.

Author	Approved by	Page 5 of 11
Quality Manager	CEO	Page 5 of 11



No.	CS01
Version No.	1.3
Date	2019-10-08

Sweden Online Gambling Systems Certification Scheme

The decision is partly based in the certification body's own assessments and partly on valid test reports which show that the gambling systems fulfil the requirements of the regulations in those parts that the accredited certification body has not tested.

1.1.4 Scheme covered by certification system

ga follows the following certification scheme as part of its certification system:

	SGA requirements	Assessment/ Testing/ Inspection/ Complete certification	Applicable Standard	Certification Standard
ga SGA Certification Scheme	Chapters 4, 5, 6 of LIFS 2018:8	Assessment	ISO 17065	ISO 17065
	Chapters 7, 8, 9, 10, 11, 13 of LIFS 2018:8 Chapter 4 of LIFS 2018:4	Testing	ISO 17025	ISO 17065
	Chapters 7, 8, 9, 10, 11, 14, 15 of LIFS 2018:8	Inspection	ISO 17020	ISO 17065

The security assessment is performed by **ga** as per ISO 17065 while testing and inspection is performed by GA EU as per ISO 17025 and 17020 respectively. **ga** reviews testing and inspection reports issued by GA EU and other conformity assessment bodies (CAB's) as part of the overall certification assessment against SGA regulations and technical requirements.

1.1.5 Certification process

The following flow charts depict the processes adopted by **ga** for certification in accordance with the "**ga** Sweden Online Gambling Systems Certification Scheme" described above. Please note that the submission for certification (apart from certification application) expected from the client includes (but not limited to):

- 1. Documentation for games including game rules, pay-tables, game maths, mapping table, etc.
- 2. Gambling System documentation including operational manual, functional description; and policies, procedures for gambling operations
- 3. Test system for remote testing/inspection of games and gambling system including game play simulation tool if available
- 4. Production environment network and connectivity diagram including third party connectivity
- 5. Security documentation including security policy, security controls, etc.
- 6. Supervised remote access to proposed production environment for security assessment tasks

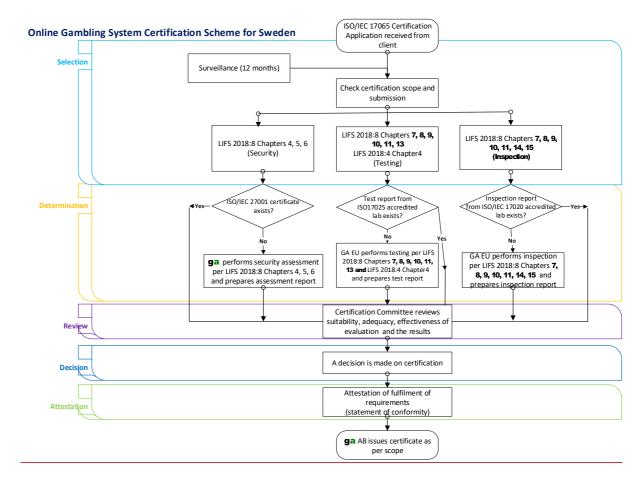
Author	Approved by	Page 6 of 11
Quality Manager	CEO	Page 6 01 11



No.	CS01
Version No.	1.3
Date	2019-10-08

Sweden Online Gambling Systems Certification Scheme

7. In case of existing ISO 27001 certification: a valid ISO/IEC 27001:2013 certificate, statement of applicability and documented risk assessment



1.1.6 Validation of conformity assessment scheme

The Conformity Assessment Scheme (CAS) has been validated in accordance with paragraph 3.9 of EA 01/22. These details are described below.

1.1.6.1 Object

The CAS is for the certification of online gambling systems in accordance with SGA requirements. The requirements are published on SGA website. The conformity assessment covers games, random number generator, gaming platform and security of the gambling systems.

1.1.6.2 Certificate

The following conformity statement will appear on the certificates:

The following online gambling system operated by:

Author	Approved by	Page 7 of 11
Quality Manager	CEO	Page 7 of 11



No.	CS01
Version No.	1.3
Date	2019-10-08

Sweden Online Gambling Systems Certification Scheme

Manufacturer Name

Manufacturer Address

and manufactured by

Manufacturer Name

Manufacturer Address

has been evaluated for SGA regulations and found compliant with the requirements. This certificate is issued in compliance with the certification mark requirements. This certificate is issued for the following product till the expiry date mentioned in the certificate, subject to annual periodic evaluation.

Certification scheme	Product	Reference standard	Regulations
Sweden Online Gambling Systems Certification Scheme	CLEINT online gambling system	ISO/IEC 17065	 SFS 2018:1138 Gambling Act, 14 June 2018 SFS 2018:1475 Gambling Ordinance, 5 July 2018 LIFS 2018:8 Regulations and Guidelines on Technical Requirements and Accreditation of Organisations for Inspection, Testing and Certification of Gambling Service Providers, 25 July 2018 LIFS 2018:5 Regulations and Guidelines for Commercial Online Gambling and Betting, 25 July 2018 LIFS 2018:4 regulations and general advice on state lotteries and lotteries for matters of public interest, 25 July 2018 LIFS 2018:2 Regulations and Guidelines for Responsible Gaming, 25 July 2018
Dates of evaluation:		DD-MM-YYYY to DD-MM-YYYY	
Date of issue:		DD-MM-YYYY	
Date of expiration:		DD-MM-YYYY	

1.1.6.3 Certification mark

The use and significance of certification mark has been documented in "QP_12_GA Use of Certification Marks". This document along with the certification marks are sent to the clients when certification is granted. There is always a risk of misuse or misinterpretation/abuse of the certification mark. The above-mentioned procedure clearly states that the misuse or abuse of certification mark by the client will incur penalties. The clients are instructed and monitored regarding use and display of certification mark.

Author	Approved by	Page 8 of 11
Quality Manager	CEO	Page 8 of 11



No.	CS01		
Version No.	1.3		
Date	2019-10-08		

Sweden Online Gambling Systems Certification Scheme

1.1.6.4 Certification requirements

The certification is performed against SGA regulations and technical requirements for online gambling systems in accordance with ISO/IEC 17065. The requirements are published on SGA website. The SGA regulations and requirements are similar to the requirements laid out by other online gaming jurisdictions around the word and **ga** and GA EU have the required expertise and skillset for testing, inspection, and security assessment of online gambling systems.

1.1.6.5 Certification system

The following evaluation methods are used in order to determine conformity of online gaming systems:

- a. testing
- b. inspection
- c. design appraisal
- d. assessment of services or processes
- e. other determination activities, e.g. verification

The SGA has advised these evaluation methods in its documents and also imposed the requirement of annual periodic evaluation. **ga** maintains records of certification for its client and will contact them before the certification expiry date.

Due to nature of online gaming systems, the SGA has change management requirements included in its technical requirements. The clients will be evaluated for compliance with change management requirements as part of security assessment under this scheme. The client will follow this approved change management process.

1.1.6.6 Conditions

The definition of nonconformity is in line with ISO/IEC 17065 and related ISO/IEC standards. **ga** has defined the following:

- a. criteria for granting, maintaining, expanding, reducing, extending, suspending or revoking certification;
- b. complaints and appeals process;
- c. records kept demonstrating compliance with the requirements; and
- d. rights and obligations of **ga**, clients, and the applicants.

1.1.6.7 Procedures

The certification processes have been described in our management system. The procedures for testing and inspection have been reviewed by UKAS under ISO/IEC 17025 (testing) and ISO/IEC 17020 (inspection) accreditation.

1.1.6.8 Expertise

ga and GA EU have vast experience in evaluation of online gaming systems against the requirements of online gaming jurisdictions around the world. GA EU is accredited by these jurisdictions. This includes evaluation of games, RNG, game math, gaming platform, player registration and account management, responsible gambling, player protection, etc.

Author	Approved by	Dogo 0 of 11
Quality Manager	CEO	Page 9 of 11



No.	CS01
Version No.	1.3
Date	2019-10-08

Sweden Online Gambling Systems Certification Scheme

ga and GA EU also have experience in information security and GA EU is approved by Payment Card Industry (PCI) Security Standards Council (SSC) as Qualified Security Assessor (QSA) and Payment Applications QSA (PA-QSA). We also provide other information security services such as risk assessment, vulnerability scanning, penetration testing, network reviews etc. Our staff holds international information security certifications such as WLA Security Control Standard Auditor, CISSP, ISO 27001 Lead Implementer, ISO 27001 Lead Auditor, CISSP, CISA, PCI QSA, PCI PA-QSA, CISM, CRISC, etc.

Competency requirements have been defined and assessed for certification auditors, decision makers, and staff performing other tasks related to testing, inspection, and certification. The competency requirements have been established based on SGA regulations and technical requirements and the certification standards.

1.1.6.9 Public nature

The scheme documents are made available to public upon request. Information about details such as evaluation procedures, rules and procedures for granting, for maintaining, for extending or reducing the scope of, for suspending, for withdrawing or for refusing certification are made available to clients upon request.

ga shall keep a list of certified products which can also be made available upon request.

1.1.7 Acceptance of conformity assessment results

ga shall accept results from Conformity Assessment Bodies (CABs) accredited by any EA MLA signatory (for the relevant scope) which follows the requirements laid down by **ga** in the capacity of scheme owner. These results include:

- 1. security assessment (ISO 27001 certificate) issued by CAB accredited for ISO/IEC 17021-1 and ISO/IEC 27006,
- 2. test reports issued by CAB accredited for ISO/IEC 17025, and
- 3. inspection reports issued by CAB accredited for ISO/IEC 17020.

The scope of conformity assessment is based on SGA regulation and technical requirements and is described in detail in this document.

These results shall be accepted if:

- 1. these reports cover the required SGA regulations and technical requirements,
- 2. the evaluation results are compliant, and
- 3. the CAB is accredited by an EA MLA signatory or an equivalent accreditation body.

1.1.8 Changes in certification scheme

The scheme document may need to be updated in order to address changes in SGA regulations and technical requirements, certification standards or due to any other reasons. Whenever the scheme document is updated, it will be communicated to the clients advising them about the changes and how these changes affect their certification.

Author	Approved by	Dogg 10 of 11
Quality Manager	CEO	Page 10 of 11



No.	CS01
Version No.	1.3
Date	2019-10-08

Sweden Online Gambling Systems Certification Scheme

2 General

2.1 Confidentiality

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2.2 Document Control

Version	Date	Description	Author	Approver	Effective Date
0.1	2019-04-19	Initial creation	BANS	ARIZ	2019-04-22
0.2	2019-04-24	QA review, updated Annexures	PCVE	ARIZ	2019-04-24
0.3	2019-05-07	Updated as per Swedac feedback	BANS	ARIZ	2019-05-07
1.0	2019-05-21	Updated and submitted to Swedac	BANS	ARIZ	2019-05-21
1.1	2019-07-12	Updated to resolved SWEDAC	PCVE	ARIZ	2019-07-15
1.2	2019-07-16	Removed detailed flow charts now in QM and use high-level chart in scheme.	PCVE	ARIZ	2019-07-17
1.3	2019-10-07	Amend section 1.1.2 replaced "periodic" with "applicable" as not fixed period surveillance audits are performed	PCVE	ARIZ	2019-10-08

Author	Approved by	Dogo 11 of 11
Quality Manager	CEO	Page 11 of 11