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## **Registrar's Standards for Gaming**

### **December 2014**





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## INTRODUCTION

### Standards-Based Approach

Under the *Gaming Control Act, 1992* (GCA) and Regulation 78/12, the Registrar of Alcohol and Gaming (Registrar) is authorized to establish risk-based standards to regulate Ontario's gaming sector. The objective of a standards-based regulatory model is to shift the focus from requiring registrants to comply with a specific set of rules or processes, which tend to be prescriptive in nature, towards the broader regulatory outcomes or objectives they are expected to achieve. These regulatory outcomes are reflected in the "Standards" established herein.

In most cases, these Standards are drafted at a high level of generality, with the aim being to capture the purpose behind the rule. This offers greater flexibility for regulated entities to determine the most efficient and effective way of meeting the outcomes required, which in turn supports market innovation. At the same time, a standards-based model allows the Alcohol and Gaming Commission of Ontario (AGCO) to focus its resources on key risks and to deliver a modernized approach to gaming regulation that can be applied flexibly to a rapidly evolving industry.

The Standards were developed based on a comprehensive risk assessment conducted in consultation with key stakeholders, including the Ontario Lottery and Gaming Corporation (OLG), public interest groups, Operators of Casinos and Charitable Gaming (cGaming) sites and other gaming and non-gaming regulators. The resulting risk inventory and risk themes are attached as Appendix A. Going forward, risk assessments will be conducted periodically to ensure that the Standards continue to be relevant, and that the highest standards of integrity for gaming in Ontario are maintained.

In some cases, further and more specific direction is provided through one or more specific "Requirements". These Requirements establish the minimum obligations a registrant must achieve in relation to a corresponding Standard.

### Application

OLG, Operators of gaming sites and other registered suppliers, gaming assistants and other employees and persons retained by OLG are required to comply with the GCA and Regulation 78/12. The GCA provides the Registrar with the authority to establish Standards and Requirements for the conduct, management and operation of gaming sites, lottery schemes or businesses related to a gaming site or a lottery scheme or for related goods or services. Sections 3.8 and 3.9 of the GCA require registrants, employees and other persons retained by OLG to comply with those Standards and Requirements.

The Registrar has established the attached Standards and Requirements as of April 2013. Subject to the exceptions described below, these Standards and Requirements will apply to OLG and to all Operators of lottery schemes conducted at gaming sites in Ontario, including Casinos, cGaming sites, and iGaming, as per implementation plans developed between the AGCO, OLG and Operators.

## Exceptions

At this time, these Standards and Requirements do not apply to the sale and purchase of lottery tickets at a gaming site of a registered seller (e.g. lottery retailer). Note, however, the AGCO intends future versions of the Registrar's Standards to cover the lottery sector.

These Standards and Requirements will not apply to lottery schemes conducted and managed by charitable organizations in accordance with section 207(1)(b) of the *Criminal Code* (Canada) or to suppliers, gaming assistants or other persons engaged in such lottery schemes. Existing standards, policies and terms and conditions will continue to apply to such lottery schemes, until such time as the Registrar determines.

## Other Registrants

In addition to OLG and Operators, certain Standards and Requirements also apply to other types of registered suppliers and gaming assistants. For purposes of clarity, the following registrants must comply with the following Standards and Requirements:

- All registered gaming-related suppliers: Standards 1.1 through 1.7, 1.9 through 1.12, 1.14 through 1.18, 1.22, 1.25 through 1.33, 1.35, 1.37 through 1.39, 1.41, 1.43 through 1.46, 2.4, 2.8, 2.11, 4.2, 4.3, 4.5 through to 4.8, 4.11, 5.2 and 5.8.
- Registered gaming-related suppliers for iGaming: Standards 1.13, 1.19, 1.20, 1.21, 1.23, 1.24, 1.34, 1.36, 1.40, 2.09, 2.10, 2.12, 2.13, 3.03, 4.01, 4.04, 4.10, 4.13, 5.03, 5.06, 5.07, 9.04, 9.05, 9.06, 9.07, 9.08, 9.09, 9.10, 9.21 through 9.26, 9.28 through 9.46, 10.04 through 10.17, 10.19 through 10.34, 12.01, 12.04, 12.05.
- Registered non-gaming-related suppliers and trade unions: Standards 1.1 and 1.46.
- Registered gaming assistants: Standards 1.4, 1.6 and 1.46.

The Registrar may direct any registered supplier or registered gaming assistant to comply with any additional Standards and Requirements, as considered necessary to enhance and preserve the integrity of and public confidence in gaming in Ontario. The Registrar may also propose additional terms of registration specific to an Operator or other registrant to give effect to the purposes of the GCA.

## Expectations and Guidance

The Registrar has articulated the following expectations in order to guide Operators in the development and implementation of their control environment, and to establish certain key principles from a forward looking industry perspective. As such, they form an integral part of the standards-based framework.

Further regulatory guidance is also provided in relation to a number of Standards and Requirements throughout this document. Guidance serves to provide registrants with greater clarity or certainty as to the purpose or intent behind a given Standard or Requirement. The AGCO plans to incorporate additional guidance in future versions of these Standards and Requirements, as necessary and in collaboration with industry and other key stakeholders, to facilitate compliance, ease of application and to ensure a consistent and shared understanding between the AGCO and its regulated entities as to the meaning and intent of the Standards and Requirements.

## Expectations

- 1) Operators will have appropriate and effective control activities in place to meet the Standards and Requirements.
- 2) Operators will develop control activities based on the regulatory risks identified by the AGCO, taking into account how these risks apply or could manifest at their particular gaming site. The AGCO recognizes that control environments will vary across gaming sites based on their specific risk profile and the context in which they carry on business (e.g. urban casino versus rural bingo hall).
- 3) Operators will use control activities that can be audited or periodically reviewed for compliance with the Standards and Requirements, and will use systems-based solutions where appropriate.
- 4) In developing their control environment, Operators will consider the Standards and Requirements in their entirety, as one control activity may be used to mitigate the risks associated with multiple Standards and Requirements.
- 5) Operators are encouraged to adopt industry standards, good practices and governance frameworks established by relevant standards-setting and standards-administering institutes and bodies to support an efficient and effective compliance framework. Similarly, Operators are encouraged to obtain certifications and accreditation, over time, to support continuous improvement of their operations and to contribute a degree of independent validation to their control environment and its design effectiveness.
- 6) An Operator's control activities must be reviewed by an independent oversight function for compliance with the Standards and Requirements. Independent oversight practices may vary by Operator depending on a number of factors, including the size, structure and complexity of the Operator's organization. Whatever the case, the Registrar expects that there will be an appropriate role for both internal and external auditors in assessing the ongoing effectiveness and efficiency of internal controls.
- 7) In addition to reviewing controls for compliance with the Standards and Requirements, audits should also take into account whether controls are consistent with appropriate and relevant industry standards, good practices and governance frameworks.
- 8) Operators shall develop an implementation and compliance plan for review by the Registrar prior to transitioning to a standards-based framework for their gaming site. An Operator's plan must cover at a minimum the following elements: its process for developing control activities, including any industry standards or good practices it utilizes as part of its compliance framework; its corporate governance structure; the roles and activities of its internal and external auditors; and the timing for each phase of implementation and anticipated full implementation date.

## **Format**

This document is divided into sections. The “Common Standards and Requirements” covered in sections 1 through 6 apply across all applicable gaming sectors and are organized according to the six major risk themes identified as part of the AGCO’s risk assessment process. Additional sector-specific Standards and Requirements are provided for iGaming, cGaming and Casinos in the sections that follow the Common Standards and Requirements.



## DEFINITIONS

Unless as defined below, words and phrases in these Standards and Requirements shall have the same meaning as in the GCA and Regulation 78/12.

**AGCO** means the Alcohol and Gaming Commission of Ontario.

**Authenticator** is the means or mechanism by which an individual is identified and verified by the system.

**Auto-wagering** is a game feature whereby the player can elect to bet during a game without having to manually activate the betting feature each time a bet is made.

A **Bet** is an amount risked in a wager.

**Board** refers to either the entire Board of Directors of an Operator or gaming-related supplier (as the case may be) or a committee of the Board that has been delegated a particular element of Board oversight (e.g. audit, compliance, etc.) For purposes of clarity, "Board" does not include the OLG Board unless the gaming site is operated by OLG.

**Casino** is a type of gaming site in which lottery schemes conducted and managed by OLG are played in a physical premises that is not a cGaming site, and includes those gaming sites listed in Appendix B.

**cGaming** or **cGaming site** is a type of gaming site maintained for the purpose of offering lottery schemes conducted and managed by OLG, a portion of whose profits are shared with eligible charitable organizations.

**Controls** or **control activities** are the individual policies, procedures, business processes, monitoring systems, structures, accountabilities, tools and instruments, etc., that comprise the control environment management establishes to address the regulatory risks identified by the AGCO and achieve the regulatory objectives reflected in the Standards and Requirements.

A **Deactivated account** is a player account which has been made no longer available to the player for log on and use.

A **Dormant account** is a player account which has been temporarily frozen due to inactivity and made unavailable for player log on and use.

A **Dual authorization access system** is an approach to granting access whereby two or more authorized individuals must operate in concert in order to authorize an individual to obtain access to a sensitive area.

**Eligible individuals** are those persons who are not prohibited from accessing gaming sites or playing lottery schemes under Standards 3.1 or 3.2.

**FINTRAC** means the Financial Transactions and Reports Analysis Centre of Canada.

**Free-to-play games** refer to games, typically offered for promotional purposes, that provide players the option to play without paying or betting.

**Gaming-related supplier** means a person who manufactures, provides, installs, tests, maintains or repairs gaming equipment or who provides consulting or similar services directly related to the playing of a lottery scheme or the operation of a gaming site.

**Gaming site** means a premises or an electronic channel maintained for the purpose of playing or operating a lottery scheme.

**Gaming supplies** refers to gaming equipment that could influence or is integral to the conduct, management or operation of a lottery scheme.

**Gaming system** includes hardware, software, applications and all associated components of gaming supplies and the technology environment.

**GCA** means the *Gaming Control Act, 1992*.

**iGaming** refers to lottery schemes conducted and managed by OLG that are played or operated through the internet, but does not include Lotto Advance.

**Independent oversight function** has the meaning ascribed to it in Standard 1.2.

**Lottery scheme** has the same meaning as in subsection 207(4) of the *Criminal Code* (Canada).

**Manual controls** are non-system, human-performed control activities.

A **Metamorphic game** is a game where features or prizes are triggered by the cumulative result of a series of plays.

**OLG** means the Ontario Lottery and Gaming Corporation. For purposes of these Standards and Requirements, OLG is also an Operator.

**Operator** means a person who operates a gaming site, and includes OLG.

**Peer-to-peer games** are a type of lottery scheme where players gamble against each other rather than against the house.

**Randomness** or **Chance** is observed unpredictability and absence of a pattern in a set of events that have definite probabilities of occurrence.

**Registrar** means the Registrar of Alcohol and Gaming under the *Alcohol and Gaming Regulation and Public Protection Act, 1996*.

**Self-excluded persons** are individuals who participate in a process established by OLG to exclude themselves voluntarily from gaming sites.

**Sensitive inventories** are assets that require strict access controls to ensure gaming integrity and protection of assets, and include at a minimum cash and cash equivalents, cash boxes, controller chips, keys that enable access to sensitive areas of a gaming machine or premises or items that affect the outcome of a game including but not limited to cards, dice, roulette and bingo balls, tiles and bingo paper.

**Single player** games are any games which are not considered to be peer-to-peer games.

**System accounts** are all accounts that are used to manage the system.

A **Two factor access system** is an approach to authentication that requires the use and verification of two of the following authentication factors in order for an individual to gain access to a sensitive area: something they have (e.g. a key or card); something they know (e.g. a password or combination); or something they are (e.g. fingerprint).

## COMMON STANDARDS AND REQUIREMENTS

### 1. ENTITY LEVEL

#### Management Integrity

**1.1 There shall be a commitment to character, integrity and high ethical values demonstrated through attitude and actions.**

**Requirements** – At a minimum:

1. Matters identified in management letters from internal and external auditors and matters identified by the Registrar shall be responded to in a timely manner.
2. All applicable laws and regulations shall be adhered to.
3. Operators and gaming-related suppliers shall create and abide by a code of conduct which addresses at a minimum conflicts of interest and transparency in dealings with the Registrar. The code of conduct must be regularly reviewed by the organization's senior management.

**Guidance:** *Management in the context of this Standard refers to executives and senior-level management who have the day-to-day responsibility of managing the business of the organization.*

#### Sound Control Environment

**1.2 Formal control activities shall be submitted to the Registrar which have been assessed by an independent oversight function acceptable to the Registrar for alignment with the Standards and Requirements and authorized by the appropriate level of management.**

**Requirements** – At a minimum:

1. A process shall be in place to periodically review control activities for effectiveness in fulfilling the Standards and Requirements and to document, remedy and adjust the controls where deficiencies or gaps are found.
2. Substantial changes to the control environment shall be communicated to the Registrar in a timely manner.
3. Control activities must be available to the AGCO (or its designate) for regulatory assurance purposes.

**Guidance:** *Independent oversight may be exercised by an internal audit body and/or external auditor, as considered appropriate by the Operator or gaming-related supplier and as acceptable to the Registrar. The Registrar recognizes that oversight practices may vary by Operator / gaming-related supplier depending on their size, ownership structure, scope and complexity of operations, corporate strategy and risk profile. Whatever the case, the independent oversight function should be responsible for auditing the organization's compliance management framework, identifying, managing and reporting on risks the organization is or might be exposed to and exercising oversight that is independent from operational management. It should also have direct and unrestricted access to the Board.*

**Additional Guidance for Gaming-Related Suppliers:** *In the application of the entity level Standards and Requirements, it is recognized that some gaming-related suppliers, particularly suppliers of gaming equipment, operate in jurisdictions in addition to Ontario and may be limited in their ability to design and implement control activities based solely on the Standards and Requirements. The intent is that these Standards and Requirements apply to gaming-related suppliers in respect of their conduct in Ontario. At a minimum, the entity level Standards and Requirements seek assurance that gaming-related suppliers, including suppliers operating in multiple jurisdictions, will have acceptable control activities and that periodic review for gaps in control activities is carried out and that the suppliers ensure that the control activities are followed where such control activities affect the respective supplier's conduct in Ontario.*

- 1.3 Operators and gaming-related suppliers shall comply with their control activities and shall have in place measures to monitor compliance and to address failures to comply.**
- 1.4 Employees shall comply with the control activities established by their employer to achieve the Standards and Requirements.**
- 1.5 Operators and gaming-related suppliers are accountable for employee compliance with control activities and shall have in place measures to monitor compliance and to address failures to comply.**
- 1.6 Employees shall inform their employer if control activities are ineffective in achieving compliance with the Standards and Requirements.**
- 1.7 Management overrides of the control activities shall be clearly documented and communicated to the Registrar.**

**Requirements** – At a minimum:

  - 1. Approval from at least two senior-level managers is required in order to override any control activity, and in each instance the override shall be reported to the Board.

**Guidance:** *The intent of this Standard is to allow senior-level management to override controls on a one-off basis in exigent or necessary circumstances and to ensure that appropriate documentation is maintained for auditing purposes. This Standard is not intended to address permanent changes to the control environment.*
- 1.8 Operators must establish, implement and maintain controls to support preparation of financial reports which comply with all applicable accounting standards, rules and good practices.**

## Organizational Structure and Capabilities

### **1.9 Employees must have the competence, skills, experience and training required to execute control activities.**

**Requirements** – At a minimum:

1. Employees involved in performing control activities must be trained and have knowledge of the organization's control environment, the regulatory risks that the controls are designed to mitigate and the regulatory objectives reflected in the Standards and Requirements.

### **1.10 Organizational structures shall be designed to promote a sound control environment and proper segregation of duties to ensure that the possibility for collusion or unauthorized or illegal activities is minimized.**

**Requirements** – At a minimum:

1. Employees shall be given the appropriate and documented authority and responsibility to carry out their job functions, subject to supervision.
2. The adequacy of segregation of duties as they relate to player protection, game integrity and protection of assets shall be regularly reviewed by the organization's internal audit group or other independent oversight function acceptable to the Registrar.
3. Operators must provide the Registrar with an organizational chart showing key reporting lines and relationships and shall ensure that it remains up to date.

### **1.11 Management clearly understands its accountability and authority for the control environment.**

**Requirements** – At a minimum:

1. Management shall have been trained and have knowledge of the organization's control environment, the regulatory risks that the controls are designed to mitigate and the regulatory objectives reflected in the Standards and Requirements.

### **1.12 Information, including logs, related to compliance with the law, the Standards and Requirements and/or adherence with control activities shall be retained for a minimum of three (3) years, unless otherwise stated.**

### **1.13 All surveillance recordings shall be retained for a minimum period as specified by the Registrar.**

## Oversight

### 1.14 **Compliance with the Standards and Requirements shall be documented in an organized manner to ensure that the information is capable of being reviewed and audited by an independent oversight function.**

**Requirements** – At a minimum:

1. Documentation shall be reviewed and analyzed to ensure compliance with the Standards and Requirements, and approved by management.
2. Internal and external auditors shall be granted access to all relevant systems, documentation (including control activities) and resources for the purpose of conducting an audit.
3. Where directed, Operators and gaming-related suppliers shall retain an independent auditor acceptable to the Registrar to carry out audits required by the Registrar and provide copies of the audit reports to the Registrar.

**Guidance:** *The intent of this Requirement is to allow the Registrar to direct third party audits where he considers necessary for regulatory assurance purposes. Although the auditor would be retained by the Operator or gaming-related supplier in these circumstances, it would report directly to the Registrar.*

4. In reviewing control activities for compliance with the Standards and Requirements, internal and external auditors shall take into account the Registrar's expectations, as articulated herein.

### 1.15 **Primary accountability for compliance resides with the Board and there shall be evidence that the Board has carried out its responsibility in this respect.**

**Requirements** – At a minimum:

1. A compliance oversight function shall be established that is independent of the activities it oversees.

**Guidance:** *Overall responsibility for compliance monitoring should ideally rest with a chief compliance officer or if such person does not exist, a member of senior management.*

2. An internal audit function shall be established that regularly audits the organization's control environment and compliance management framework and exercises oversight that is independent from operational management. The internal audit function shall have the authority to independently review any aspect of the operations.

**Guidance:** *Where this is not feasible given the organization's size or structure, audits should be carried out by another independent oversight function.*

3. The compliance oversight function and internal audit or other independent oversight function shall have direct and unrestricted access to the Board and shall report on all important issues regarding compliance on a regular basis or as necessary.
4. The Board shall establish a committee or committees to oversee the organization's compliance and audit oversight functions, with appropriate terms of reference addressing composition and accountabilities.
5. Members of the Board and of any committees established to oversee the organization's compliance and audit oversight functions shall understand the business's operations, initiatives and major transactions, and shall have the skills, training, experience and independence to carry out their fiduciary responsibilities.

**1.16 There shall be an independent “whistleblowing” process to allow employees to anonymously report deficiencies or gaps in the control environment as well as incidents of possible non-compliance with the controls, Standards and Requirements, or the law.**

**Requirements** – At a minimum:

1. Issues raised through the “whistleblowing” process must be addressed and communicated to the Board in a timely manner.

**1.17 Registrants shall engage with the Registrar in a transparent way.**

**Requirements** – At a minimum, Operators shall:

1. Provide reports regarding any incident or matter that may affect the integrity or public confidence in gaming, including any actions taken to prevent similar incidents from occurring in the future, in accordance with the established notification matrix.
2. Provide reports regarding any incident of non-compliance with the law, Standards and Requirements or control activities, including any actions taken to correct the cause of non-compliance, in accordance with the established notification matrix.
3. Provide periodic reports demonstrating the performance over time of compliance with control activities.
4. Make available any data, information and documents requested by the Registrar.
5. Provide reports regarding any public complaints related to compliance with the Standards and Requirements, including any actions taken to resolve the complaints, in accordance with the established notification matrix.

## **Information Technology**

**1.18 A recognized industry standard framework shall be used to manage the information technology (IT) control environment to support compliance with the Standards and Requirements.**

## **Security Management**

**1.19 Users shall be granted access to the gaming system based on business need.**

**Requirements** – At a minimum:

1. Access privileges are granted, modified and revoked based on employment status and job requirements and all activities associated with these actions are logged.
2. Access privileges are independently reviewed and confirmed on a periodic basis.

**1.20 All system accounts shall be uniquely assigned to an individual.**

**1.21 Processes shall be in place to ensure that only authorized individuals are permitted to open system accounts.**



- 1.22 Industry accepted components, both hardware and software, shall be used where possible.**
- 1.23 Any connection or interface between the gaming system and any other system, whether internal or external third party, shall be monitored, hardened and regularly assessed to ensure the integrity and security of the gaming system.**
- 1.24 Mechanisms shall be in place to ensure the reliability, integrity and availability of the gaming system.**
- 1.25 There shall be a suitably secure physical environment in place to prevent unauthorized access to the gaming system and to ensure the protection of assets.**
- 1.26 Gaming systems, infrastructure, data, activity logs and all other related components shall be protected from threats, vulnerabilities, attacks or breaches.**
- Requirements – At a minimum:**
1. All users shall be authenticated.
  2. All components shall be hardened in accordance with industry and technology good practices prior to going live and prior to any changes.
  3. The appropriateness and effectiveness of steps taken to harden technology components shall be regularly assessed.
  4. Patches to correct any security risks shall be updated regularly.
- 1.27 Security activities shall be logged in an auditable manner, monitored, promptly analyzed and a report prepared and escalated as appropriate.**
- Requirements – At a minimum:**
1. Attempts to attack, breach or access gaming system components in an unauthorized manner shall be responded to in a timely and appropriate manner.
  2. Intrusion attempts shall be actively detected and where possible prevented from causing disruption or outage of the gaming system.
  3. There shall be adequate logging to capture and monitor any attempts to attack, breach or access in an unauthorized manner any components of the gaming system. There shall be an appropriate escalation procedure.
- 1.28 Independent assessments shall be regularly performed by a qualified individual to verify the adequacy of gaming system security and all of its related components.**
- 1.29 Operators and gaming-related suppliers shall stay current on security trends, issues and solutions.**

## **Change Management**

- 1.30 A system development lifecycle that considers security and processing integrity shall be in place for gaming system technology developed in-house.**
- 1.31 Due diligence must be performed on all acquired gaming system technology to ensure security and processing integrity requirements are met.**
- 1.32 A testing strategy to address changes in technology shall be in place to ensure that deployed gaming systems operate as intended.**
- 1.33 All gaming system changes shall be appropriately, consistently and clearly documented, reviewed, tested and approved.**
- Requirements** – At a minimum:
1. All gaming system technology components are installed and maintained in accordance with the appropriate change management procedures.
  2. Requests for changes and maintenance of the gaming system are standardized and are subject to change management procedures.
  3. Emergency changes are approved, tested, documented, and monitored.
  4. Change management procedures shall account for segregation of duties between development and production.
  5. Only dedicated and specific accounts may be used to make changes.
- 1.34 The gaming system shall be able to detect unauthorized changes.**

## **Data Governance**

- 1.35 Data governance shall be in place to address data processing integrity and protection of sensitive data.**
- 1.36 Sensitive data, including player information and data relevant to determining game outcomes, shall be secured and protected from unauthorized access or use at all times.**
- Requirements** – At a minimum:
1. The gaming system shall ensure that data is appropriately backed up in a manner that allows it to be completely and accurately restored.
  2. Data backups shall be stored off-site in a secure location and in accordance with applicable policies and laws.

**1.37 All player information shall be stored and maintained within Ontario.**

**Requirements** – At a minimum:

1. Data protection requirements for player personal information shall meet those set out in the *Freedom of Information and Protection of Privacy Act*.
2. Movement of player personal information outside of Ontario shall only occur with player consent, unless the movement of player personal information outside of Ontario is for the purposes of fulfilling OLG's legal obligations under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*.
3. Player information shall only be used for OLG's business unless there is prior approval from OLG.

**1.38 All gaming systems critical to the outcome of the lottery scheme shall reside in Ontario, unless the lottery scheme is conducted in conjunction with the government of another province.**

**1.39 Communication of sensitive game data shall be protected for integrity, either through dedicated and physically secure communication lines, or by encrypting to industry good standards and industry accepted encryption algorithms.**

**1.40 Procedures shall be established and documented for IT operations and incident management, including managing, monitoring and responding to security and processing integrity events.**

**Requirements** – At a minimum:

1. Proactive monitoring and detection of errors in the gaming system and related components shall be in place. Action shall be immediately taken to correct incidents of non-compliance with the Standards and Requirements or control activities.
2. There shall be time synchronization of the gaming system environment and related components.
3. Event data shall be retained to provide chronological information and logs to enable the reconstruction, review and examination of the time sequences of processing.

**1.41 Gaming applications on all portable devices shall be appropriately secured.**

**Guidance:** *This Standard is not intended to capture players using their own portable devices such as their smartphones, but rather employees or players using portable devices to access the Operator's gaming system.*

## **Third Party Management**

**1.42 Operators shall only contract with reputable suppliers.**

**1.43 Service levels for management of suppliers shall be established.**

**Requirements** – At a minimum:

1. Service levels must be documented and enforceable.
2. Corrective action is taken to address non-compliance with established service levels.

- 1.44 Operators and gaming-related suppliers shall provide the Registrar with a list of suppliers that provide them with goods or services in relation to lottery schemes and shall ensure that this list is kept up to date.**

### **Compliance with Technical Standards**

- 1.45 Operators and gaming-related suppliers shall comply with applicable technical standards issued by the Registrar.**

### **Compliance with OLG Policies and Procedures**

- 1.46 All registrants and non-gaming-related suppliers who are exempt from registration will comply with all applicable OLG policies and procedures to the extent that they are consistent with these Standards and Requirements.**

## **2. RESPONSIBLE GAMBLING**

### **2.1 Advertising and marketing materials and communications shall not target underage or self-excluded persons to participate in lottery schemes and shall not include underage individuals.**

**Requirements** – At a minimum, materials and communications shall not:

1. Be based on themes, or use language, intended to appeal primarily to minors.
2. Appear on billboards or other outdoor displays that are directly adjacent to schools or other primarily youth-oriented locations.
3. Contain cartoon figures, symbols, role models, and/or celebrity/entertainer endorsers whose primary appeal is to minors.
4. Use individuals who are, or appear to be, minors to promote gambling.
5. Appear in media and venues directed primarily to minors, or where most of the audience is reasonably expected to be minors.

### **2.2 Advertising and marketing materials and communications shall not be misleading.**

**Requirements** – At a minimum, materials and communications shall not:

1. Imply that playing a lottery scheme is required for social acceptance, personal success, financial success or resolving economic, social or personal problems.
2. Contain endorsements by well-known personalities that suggest that playing lottery schemes has contributed to their success.
3. Encourage play as a means of recovering past gambling or other financial losses.
4. Present winning as the most probable outcome, or misrepresent a person's chances of winning a prize.
5. Imply that chances of winning increase:
  - a. The longer one plays;
  - b. The more one spends; or
  - c. Suggest that skill can influence the outcome (for games where skill is not a factor).

### **2.3 Information about the risks of gambling and where to obtain additional information or assistance shall be made readily available to all patrons.**

**Requirements** – At a minimum:

1. Responsible gambling materials and information about obtaining help, including Ontario's Problem Gambling Help Line, shall be available, visible and accessible to all patrons.
2. Information about setting betting limits, if applicable, shall be made available to all patrons.
3. Information about self-exclusion programs shall be available, visible and accessible to all patrons.
4. Advertising and marketing materials shall, where effective, contain a responsible gambling message.
5. All information related to responsible gambling shall be regularly and periodically reviewed and updated to ensure that it is accurate, up to date and in line with industry good practice.

**2.4 Patrons shall be provided with meaningful and accurate information to enable them to make informed choices.**

**Requirements** – At a minimum:

1. Meaningful and accurate information on the rules of play shall be clearly stated and made available to patrons.
2. Meaningful and accurate information on the odds of winning, payout odds or returns to patrons shall be clearly stated and made available to patrons.

**2.5 Support shall be provided to persons showing signs of potentially problematic gambling behavior.**

**Requirements** – At a minimum:

1. All employees who interact with players shall receive training in a Registrar-approved program designed to identify and respond appropriately to players who may be showing signs of problem gambling.
2. Players shall be provided with easily accessible contact information of at least one organization dedicated to treating and assisting problem gamblers.
3. OLG shall develop and enforce responsible gambling policies, procedures and training, ensure they are available, kept up to date and relevant, and that the Operator complies with them.
4. Responsible gambling policies shall be reviewed periodically for effectiveness.

**2.6 OLG shall provide a common voluntary self-exclusion program.**

**Requirements** – At a minimum:

1. At the time of signing up for self-exclusion, individuals shall have the option to be excluded from any or all gaming sectors (e.g. Casino, cGaming).
2. Despite requirement 1, if a player self-excludes from a Casino, the player is not eligible to gamble on OLG's iGaming site for the duration of the self-exclusion period.
3. Individuals shall have the option to sign up for the self-exclusion program at gaming sites or at an off-site location.
4. Self-exclusions shall have a term of at least six months.
5. Operators shall take active steps to identify and, if required, remove self-excluded persons when they are found to be in breach of their self-exclusion agreement.

**Guidance:** *OLG's self-exclusion program may be executed in each of the gaming sectors using different processes and technologies to reflect the distinct operational circumstances of that sector, however, the long term expectation is that OLG will be able to identify, track and prohibit access to self-excluded persons in and between the various gaming sectors.*

**2.7 Individuals who have decided to voluntarily self-exclude shall be removed from mailing lists and shall not receive incentives or promotions for any products and services during the period of self-exclusion.**

## **2.8 Game designs and features shall be clear and shall not mislead the player.**

**Requirements** – At a minimum:

1. Where a game simulates a physical device, the theoretical probabilities and visual representation of the game shall correspond to the features and actions of the physical device, unless otherwise disclosed to the player.
2. Game design shall not give the player the perception that speed of play or skill affects the outcome of the game when it does not.
3. After the selection of game outcome, the game shall not make a variable secondary decision which affects the result shown to the player. If the outcome is chosen that the game will lose then the game shall not substitute a particular type of loss to show to the player (i.e. near miss).
4. Where the game requires a pre-determined pattern (for example, hidden prizes on a map), the locations of the winning spots shall not change during play, except as provided for in the rules of play.
5. Games shall not display amounts or symbols that are unachievable.
6. Games shall not contain intentionally programmed subliminal messaging.
7. Where games involve reels:
  - a. For single line games, jackpot symbols shall not appear in their entirety more than 12 times on average, adjacent to the pay-line, for every time they appear on the pay-line;
  - b. For multi-line games, jackpot symbols shall not appear in their entirety more than 12 times, on average, not on any pay-line, for every time they appear on any pay-line.
8. Free-to-play games shall not misrepresent or mislead players as to the likelihood of winning or prize distribution of similar games played for money.
9. The denomination of each credit shall be clearly displayed on game screens.

## **2.9 Free-to-play games shall provide the same responsible gambling and player protection information as games played for money.**

## **2.10 Only eligible individuals are permitted to play free-to-play games.**

## **2.11 Games shall not encourage players to chase their losses, or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they want to stop.**

## **2.12 Players shall have the means to track the passage of time.**

## **2.13 Games that are located in gaming sites that are not age-restricted shall not appeal primarily to, nor be associated with, underage individuals.**

### **3. PROHIBITING ACCESS TO DESIGNATED GROUPS**

#### **3.1 Only eligible individuals are permitted access to a gaming site.**

**Requirements** – At a minimum:

1. A policy on eligibility of access to the gaming site, play and payment of prizes shall be established, implemented and made public.
2. The following individuals shall not be permitted access to the gaming site:
  - a. An individual under 19 years of age where the gaming site is a Casino;
  - b. An individual under 19 years of age where the gaming site is an iGaming site, except where the individual is at least 18 years of age and is accessing the gaming site solely for the purpose of purchasing a lottery ticket;
  - c. An individual under 18 years of age where the gaming site is a cGaming site;
  - d. Individuals who appear to be intoxicated if the site is a physical premises;
  - e. Every individual who advises the Operator or OLG that the individual is participating in a self-exclusion process established by OLG that applies to the site, unless the individual is accessing the gaming site in the course of their employment;
  - f. An individual who is known by the Operator to have been restricted from accessing the gaming site or playing a lottery scheme as a condition of a court order;
  - g. Individuals who the Operator or OLG have reason to believe have been excluded from the site under subsection 3.6(1) of the GCA.

#### **3.2 Only eligible individuals are permitted to play a lottery scheme.**

**Requirements** – At a minimum:

1. The following individuals shall not be permitted to play lottery schemes:
  - a. An individual under 19 years of age where the gaming site is a Casino
  - b. An individual under 19 years of age where the gaming site is an iGaming site, except where the individual is at least 18 years of age and is accessing the gaming site solely for the purpose of purchasing a lottery ticket;
  - c. An individual under 18 years of age where the gaming site is a cGaming site;
  - d. Individuals who appear to be intoxicated if the site is a physical premises;
  - e. Every individual who advises the Operator or OLG that the individual is participating in a self-exclusion process established by OLG that applies to the site;
  - f. An individual who is known by the Operator to have been restricted from accessing the gaming site or playing a lottery scheme as a condition of a court order;
  - g. Individuals who the Operator or OLG have reason to believe have been excluded from the site under subsection 3.6(1) of the GCA;
  - h. Officers, members of the board of directors or partners of the Operator;
  - i. Registered gaming assistants of an Operator or OLG employed at any gaming site operated by the Operator or OLG;
  - j. Executives or staff of a trade union who represent or negotiate on behalf of employees employed at the site;



- k. Employees of registered suppliers who maintain or repair gaming equipment at the site;
  - l. Members or employees of the AGCO;
  - m. Officers, members of the board of directors, or employees of OLG, unless they are within the description set out in subsection 22(6) of Ontario Regulation 78/12 (ie. they are registered as category 2 gaming assistants or otherwise not required to be registered by the AGCO).
2. Individuals described in paragraphs 1. a. to c. and e. to m. shall not be permitted to win prizes in accordance with the policy on prize payment.

**Note:** *This Standard does not preclude the AGCO from participating in games for regulatory assurance purposes.*

**3.3 Lottery schemes shall be provided only within Ontario, unless the lottery scheme is conducted in conjunction with the government of another province.**

## **4. ENSURING GAME INTEGRITY AND PLAYER AWARENESS**

### **4.1 All gaming activities and financial transactions shall be conducted fairly and honestly, and must be independently verifiable.**

**Requirements** – At a minimum:

1. Continuous independent monitoring and recording of lottery schemes and cash (and cash equivalent) handling must be in place to support the verification of:
  - a. Adherence to required rules of play by players and employees;
  - b. Confirmation of outcomes of lottery schemes;
  - c. Prize payment to the proper person;
  - d. Accuracy of financial transactions.
2. Continuous logs shall be maintained for critical gaming systems including to track financial accounting and game state history.
3. Periodic performance reports must be completed for employees involved in the delivery of lottery schemes with respect to adherence to required procedures. Reports shall be completed more frequently for employees with higher rates of non-adherence.

### **4.2 Rules of play, including any subsequent modifications, shall be submitted to the Registrar for approval.**

**Requirements** – At a minimum, the rules of play shall contain:

1. Odds of winning, payout odds or returns to players.
2. A description of how the game is played.
3. Circumstances in which a game can be declared void.

### **4.3 Lottery schemes must be conducted in accordance with the approved rules of play.**

**Requirements** – At a minimum:

1. All bets shall be accepted, processed and settled in accordance with the approved rules of play.
2. Adequate supervision of the lottery scheme is in place to ensure adherence to required procedures.
3. Devices that compromise or affect the lottery scheme shall not be permitted.

### **4.4 Reasonable accommodation may be provided to patrons and employees based on disabilities or religious beliefs and/or to address health and safety requirements, so long as these accommodations do not affect the integrity of the game or obscure independent monitoring activities.**

### **4.5 All gaming systems and gaming supplies, including any subsequent modifications, shall be submitted to the Registrar for testing and approval, at the expense of the supplier, prior to being made available for play.**

- 4.6 Gaming supplies and gaming systems shall operate in accordance with the Registrar's approval.**  
**Requirements** – At a minimum:
1. Only gaming systems and gaming supplies approved by the Registrar shall be used at a gaming site.
  2. The Registrar shall be immediately notified where there is any problem with the integrity or security of the gaming system or gaming supplies.
  3. Monitoring and testing shall be performed throughout the life of the gaming system and gaming supplies to ensure they are operating as approved.
- 4.7 Production, testing and development systems shall be logically separated.**
- 4.8 Game outcomes shall be recoverable, where technically possible, so that player bets can be settled appropriately.**
- 4.9 Where incomplete games are not recoverable, the rules of play shall clearly define the Operator's policies in respect of treating the player fairly when resolving the player's transactions.**
- 4.10 Mechanisms shall be in place to allow a game to be recreated up to and including the last communicated state to the player.**  
**Requirements** – At a minimum:
1. Selected electronic game elements and game outcomes shall be logged before they are displayed to the player.
  2. Information shall be captured that is needed to continue a partially complete game within a reasonable period of time.
- 4.11 A player's bet and the outcome of the game shall be clearly displayed and easy to understand.**
- 4.12 Patron complaints and any inquiries related to game integrity must be recorded and addressed in a timely and appropriate manner.**
- 4.13 Games shall pay out accurately, completely and within a reasonable time of winning, subject to checks and verifications.**
- 4.14 Operators shall have mechanisms in place to appropriately deter, prevent and detect collusion and cheating.**
- 4.15 All relevant activities related to the detection of collusion and cheating shall be logged.**
- 4.16 Players must be able to easily and readily report activities related to collusion and cheating.**

## **5. PUBLIC SAFETY AND PROTECTION OF ASSETS**

### **5.1 Operators shall have available for review by the AGCO floor plans and documentation showing that the premises complies with all applicable laws including:**

- a. Zoning by-laws respecting the use of the premises
- b. *Building Code Act, 1992*
- c. *Fire Protection and Prevention Act, 1997* (including emergency evacuation plans)
- d. *Health Protection and Promotion Act, 1997*
- e. *Liquor Licence Act*

#### **Requirements – At a minimum:**

1. Floor plans shall identify the sensitivity level of each area of the premises including:
  - a. Areas within the premises at which lottery schemes are offered, showing the current inventory and location of games;
  - b. Financial control areas;
  - c. Areas containing sensitive inventories.
2. Floor plans or other documentation shall identify areas where a dual authorization access system or two factor access system is appropriate, given the sensitivity level of the area.
3. Floor plans or other documentation shall include the maximum capacity approved for the gaming site.

### **5.2 Only authorized individuals shall be permitted access to sensitive areas.**

#### **Requirements – At a minimum, Operators shall:**

1. Adopt a dual authorization or two factor access system for those sensitive areas of the premises or sensitive parts of gaming supplies identified by the Operator.

**Guidance:** *There may be various levels of sensitivity in a gaming site. Dual authorization access will be appropriate for the highest risk areas, such as playing card vaults and cash count rooms, where strict controls are necessary to secure the gaming site and/or safeguard gaming integrity or assets. Two factor access, on the other hand, may be appropriate for other types of sensitive areas or equipment. Each gaming site is unique and should define its sensitive areas as it deems appropriate. The Registrar, however, retains the authority to direct an Operator to adopt a certain form of access authorization for a certain area or equipment, as deemed necessary.*

### **5.3 Individuals suspected of, or engaged in, creating a disturbance that could be harmful to the individual, to the public or to gaming-related assets shall be removed from the premises, and the occurrence shall be reported in accordance with the established notification matrix.**

### **5.4 A policy and process shall be in place to provide individuals with security escorts to and from vehicles, where it is requested.**

### **5.5 Areas under the control of the Operator shall be monitored for the presence of unattended children. All occurrences of unattended children shall be addressed and reported in accordance with the established notification matrix.**

**5.6 There shall be site emergency procedures to protect the public from personal harm and limit the damage to or loss of gaming-related assets.**

**Requirements** – At a minimum:

1. Employees or persons retained by the Operator shall be competent in implementing site emergency procedures.

**5.7 Security and surveillance shall be in place to protect the public and gaming-related assets and to record transactions.**

**Requirements** – At a minimum:

1. Floor plans must show surveillance equipment positioning for each area including:
  - a. location(s) of the lottery schemes (including the camera coverage for each);
  - b. areas containing cash or cash equivalents such as cages, count rooms, armoured car pickups and deliveries;
  - c. areas containing sensitive inventories;
  - d. all entrances and exits (points of egress).

**Guidance:** *The intent of Requirement 1(d) is to ensure that all points of access which directly or indirectly lead to the gaming floor or sensitive areas at a minimum have camera coverage or an alarm, which is actively monitored for unauthorized access.*

2. Surveillance plans must include activities that address the following:
  - a. camera coverage and control systems for all lottery schemes;
  - b. secure movement of cash, cash equivalents and sensitive inventories within the gaming site;
  - c. interventions related to persons suspected of conducting illegal activities at the gaming site.
3. Any interruption of monitoring activities shall be immediately reported in accordance with the established notification matrix.
4. Continuous independent monitoring must be provided even if the premises is closed to the public.
5. Video/digital recordings shall be made and retained for a minimum period as specified by the Registrar.
6. Destruction of sensitive inventories, whether performed on the premises or at another site, shall be conducted under the supervision of security personnel and verified independently by staff from another department.

**5.8 There shall be timely and accurate maintenance of gaming-related financial transactions, accounting information and data.**

**5.9 Lottery schemes shall be played only within designated areas of the premises.**

## **6. MINIMIZING UNLAWFUL ACTIVITY RELATED TO GAMING**

### **6.1 Mechanisms shall be in place to reasonably identify and prevent criminal activities at the gaming site.**

**Requirements** – At a minimum:

1. Periodic risk assessments shall be conducted to determine the potential for illegal activities, including money laundering, fraud, theft and cheat at play.
2. All employees involved in the operation, supervision or monitoring of the gaming site shall remain current in the identification of techniques or methods that may be used for the commission of crimes at the gaming site.
3. Player and employee transactions must be appropriately monitored and suspicious transactions analyzed for possible illegal activity.
4. Suspicious behaviour, cheating at play and criminal activities shall be reported in accordance with the established notification matrix.

### **6.2 Anti-money laundering policies and procedures to support obligations under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* shall be implemented and enforced.**

**Requirements** – At a minimum:

1. Copies of all reports filed with the FINTRAC and supporting records shall be made available to the Registrar.
2. Operators shall inspect valid government issued photo identification in relation to anti-money laundering requirements.

## iGAMING - ADDITIONAL STANDARDS AND REQUIREMENTS

The following additional Standards and Requirements apply to iGaming.

### 7. PLAYER ACCOUNT MANAGEMENT (iGAMING)

#### Registration and Account Creation

- 7.1 Relevant player information shall be collected and saved upon registration and shall be demonstrated to be complete, accurate and validated before a player account is created for the player.**

**Requirements** – At a minimum, the following information shall be gathered upon registration:

1. Name.
2. Date of birth.
3. Address.
4. Method of identification for subsequent log on.
5. Player contact information.
6. Information required by the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and to be filed with FINTRAC.

- 7.2 Before a player account is created, players shall affirm that all player information provided upon registration is complete and accurate.**

- 7.3 Only eligible individuals are permitted to create a player account and gamble.**

**Note:** This Standard does not preclude the AGCO and OLG from being granted access to accounts for purposes of testing and/or monitoring.

#### Player Account Maintenance and Transactions

- 7.4 Player information shall be kept complete and accurate.**

- 7.5 Prior to participating in game play, players must affirm that they are fit for play.**

- 7.6 Only eligible individuals who hold a valid player account are permitted to log on to their account and gamble.**

**Note:** This does not preclude the AGCO and OLG from being granted access to accounts for purposes of testing and/or monitoring.

- 7.7 All player accounts shall be uniquely identifiable.**

- 7.8 Players may have only one player account with an Operator.**

**7.9 The list of prohibited and excluded individuals may change from time to time. Player information shall be re-verified at the time of change and at regular intervals thereafter.**

**Guidance:** *The intent is to ensure that each time the list of individuals who are prohibited from accessing gaming sites or playing lottery schemes under Standards 3.1 and 3.2 changes, all registered player information is checked to ensure that all registered players are still eligible to play and, if they are not eligible, they are prohibited from gambling.*

**7.10 There shall be an auditable trail of events that is logged and available relating to account creation and activation and account changes.**

**Requirements** – At a minimum, an auditable trail of events shall be available for the following:

1. Information relating to player identification and verification.
2. Information related to any contractual agreements entered into between the OLG and the player.

**7.11 Players shall acknowledge and accept the terms of the contract between the player and OLG prior to account creation and shall acknowledge and accept any subsequent changes to the terms of the contract when the player logs onto their account.**

**7.12 All players shall be authenticated prior to accessing their player account and being permitted to gamble.**

**7.13 All player account transactions shall be recorded and logged in an accurate and complete manner.**

**7.14 Player account information shall be made readily available to the player.**

**7.15 All player account transactions shall be made readily available and clear to the player.**

**Requirements** – At a minimum, the gaming system shall give the player access to the following player account transactions:

1. Deposit/withdrawal history, and current balance.
2. Log in time, last log in time and last log out time.
3. Gaming event and transaction history.
4. Method and source of funds used for transactions.
5. Total monies wagered for session and/or period of time.
6. Total monies won or lost for session and/or period of time.
7. Account balance at start and end of session.

**Guidance:** *Player account transactions under this Standard would not include logs of game play activity (e.g. log for each hand played).*

**7.16 All player account transactions shall be uniquely identifiable and traceable to a unique individual player account.**



## **Deactivation and Dormant Accounts**

- 7.17 Reasonable efforts shall be made to inform players of player funds remaining in dormant accounts.**
- 7.18 Players may elect to deactivate their player account at any time and, once the election is made, the account is deactivated.**
- 7.19 There shall be an auditable trail of events logged and available regarding account deactivation.**
- 7.20 Where necessary, a player account may be deactivated by the Operator.**
- 7.21 A player account shall be deactivated if requested by the Registrar.**
- 7.22 If player information is removed, OLG shall ensure that it is archived in accordance with records retention schedules.**
- 7.23 Where an account becomes dormant, the player shall be able to recover the balance of their account owing to them.**
- 7.24 Where an account is deactivated, by a player or another authorized individual, the player shall be able to recover the balance of their account owing to them.**

## **8. FUNDS MANAGEMENT (iGAMING)**

### **Deposits**

- 8.1 A player may be permitted to deposit funds into his/her player account only after the appropriate verifications and authorization.**

**Requirements** – At a minimum, deposits shall be verified and authorized to ensure the following:

1. Deposits made are appropriately authorized by a financial services provider.

### **Withdrawals**

- 8.2 Players are permitted to withdraw funds from their player account only after the appropriate verifications and authorization.**

**Requirements** – At a minimum:

1. Withdrawals shall be verified and authorized to ensure the following, before a withdrawal is permitted:
  - a. The withdrawal is being made by a holder of the account;
  - b. The withdrawal is being transferred to an account of which the player is a legal holder;
  - c. Where winnings are equal to \$10,000 or more, additional verification shall take place to ensure that the player is eligible to receive the winnings.

- 8.3 Players are permitted to withdraw funds from their player account in an accurate and complete fashion and within a reasonable timeframe.**

### **Funds Maintenance and Transactions**

- 8.4 Player funds shall be clearly and appropriately managed.**
- 8.5 All player funds deposited shall be held in an OLG account.**
- 8.6 Operators shall not extend credit or lend money to players or refer players to credit providers or imply or infer that a player should seek additional credit to play games.**
- 8.7 A player shall never have a negative funds balance.**
- 8.8 Players shall be provided with a clear and accurate representation of their funds account balance that is easily accessible and readily available at all times.**

**Requirements** – At a minimum:

1. The player balance shall be displayed in Canadian dollars.

- 8.9**     **Players shall be provided with unambiguous information about all player account fees prior to making a withdrawal or deposit.**
- 8.10**   **Players shall be informed clearly and specifically of all rules and restrictions regarding deposits and withdrawals and access to funds in connection with deposits and withdrawals.**
- 8.11**   **Funds shall not be transferred between player accounts without the Registrar's approval.**
- 8.12**   **Adjustments to player accounts shall be made accurately and only by authorized individuals.**
- 8.13**   **Adjustments to player accounts shall be recorded and logged in an accurate and complete manner.**
- 8.14**   **Players shall be provided with accurate, clear and specific reasons for any adjustments made to their accounts.**

## 9. SECURITY (iGAMING)

### Architecture and Infrastructure

- 9.1** The gaming system architecture and all its related components shall demonstrate security in depth.
- 9.2** All gaming systems and devices shall validate inputs before inputs are processed.
- 9.3** The gaming system shall only display the minimum information about the gaming system to unauthorized users and during system malfunctions.  
***Guidance:** The intent is to ensure that the gaming system does not display unnecessary information to unauthorized individuals that may be used to compromise the gaming system or privacy of information.*
- 9.4** All remote access methods shall be appropriately secured and managed.
- 9.5** Use of wireless communication shall be secured and only used where appropriate.  
***Guidance:** The intent is to ensure that wireless communication is not present in areas where it could be potentially harmful (e.g. data centres).*
- 9.6** All components shall be hardened as defined by industry and technology good practices prior to going live and as part of any changes.  
**Requirements** – At a minimum:
1. All default or standard configuration parameters shall be removed from all components where a security risk is presented.
  2. The appropriateness and effectiveness of steps taken to harden technology components shall be regularly assessed and, if appropriate, changes must be made to improve the hardening.
- 9.7** Access shall be appropriately restricted to ensure that the domain name server records are kept secure from malicious and unauthorized changes.

### Data and Information Management

- 9.8** All private encryption keys shall be stored on a secure and redundant media that is only accessible by authorized management personnel.
- 9.9** Encryption keys must be appropriately rotated at regular intervals.
- 9.10** The gaming system architecture shall limit the loss of data and session information.

## **System Account Management**

- 9.11** The gaming system shall be able to change, block, deactivate or remove system accounts in a timely manner upon termination, change of role or responsibility, suspension or unauthorized usage of an account.
- 9.12** A secure authenticator that meets industry good practices shall be used to identify a user and his or her account to ensure that only authorized individuals are permitted to access their system account on the gaming system.
- Requirements** – At a minimum:
1. The gaming system shall automatically lock out accounts should identification and authorization requirements not be met after a defined number of attempts.
- 9.13** The gaming system shall ensure that all access to the system is fully attributable to, and logged against, a unique user identification.
- 9.14** Only the minimum access rights shall be granted to each system account on the gaming system and access rights shall be clearly documented.
- 9.15** All temporary and guest accounts shall be disabled immediately after the purpose for which the account was established is no longer required.
- 9.16** System accounts and system access rights for the gaming system shall be regularly reviewed and updated.
- 9.17** A log of account owners shall be kept and regularly reviewed and updated.
- 9.18** A mechanism shall be in place to ensure that the assignment of administrator accounts is approved by the Operator's management and that usage is monitored for appropriateness.
- 9.19** Inappropriate use of system accounts on the gaming system shall be logged, reviewed and responded to within a reasonable period of time.
- 9.20** Inappropriate use of administrator accounts shall be reported to the Registrar in a timely manner.

## **Software**

**Note:** The following Standards apply to the following types of software: 1) Commercial off the shelf software, 2) Modified commercial off the shelf software, 3) Proprietary developed software, and 4) OLG specific developed software.

- 9.21** Software used for the gaming system shall be developed using industry good practices.
- 9.22** Software development methodologies used shall be clearly documented, regularly updated and stored in an accessible, secure and robust manner.

- 9.23** An appropriate system shall be in place to manage the software development and ongoing software management lifecycle.
- 9.24** All software development roles shall be segregated during and after release of code to a production environment.
- 9.25** The Operator shall establish an appropriate audit trail of authority and management review of code for software.
- 9.26** Controls shall be in place to ensure software is appropriately secured and access is appropriately restricted throughout development.
- 9.27** The Operator's authorized management staff shall review and approve software documentation to ensure that it is appropriately and clearly documented.
- 9.28** Source code and compiled code shall be securely stored.  
***Guidance:** Compiled code could be digitally signed or hashed (including each time there is a change) in a manner that allows for external verification.*
- 9.29** The promotion or movement of code from testing through other environments to production shall be accompanied by the appropriate documentation and approvals.
- 9.30** All promotion of code from development to production shall only be performed by production support staff and not by development staff.
- 9.31** Appropriate testing environments shall be in place to allow for thorough testing of any code before it is put into production.
- 9.32** Access to production environments shall be restricted from development personnel.  
***Note:** This does not preclude granting of temporary supervised access for conducting technical investigations that may only be performed on the production environment.*
- 9.33** Development code shall not be present in the production environment.
- 9.34** A mechanism shall be built into the gaming system to verify the integrity of the software that is deployed to production, including before changes are implemented, as well as on an ongoing basis.
- 9.35** Appropriate release and configuration management systems shall be in place to support software development.
- 9.36** All code developed by a third party shall be tested to ensure it meets industry good practices and that it performs to meet its purpose prior to being added to the testing environment and prior to integration testing.
- 9.37** All code developed by a third party shall pass integration testing before it is added to production.

- 9.38 Mechanisms shall be in place to ensure that bugs are identified and addressed prior to, and during, production.**
- 9.39 Quality assurance processes, including testing, shall take place during development and prior to the release of any code.**
- 9.40 All components, where appropriate, shall be tested for the purposes for which they will be used.**

## **Change Management**

- 9.41 Post implementation reviews shall be performed to ensure that changes have been correctly implemented and the outcomes shall be reviewed and approved.**
- 9.42 All change related documentation and information shall be captured, stored and managed in a secure and robust manner.**
- 9.43 The implementation of software related updates, patches or upgrades shall be regularly monitored, documented, reviewed, tested and managed with appropriate management oversight and approval.**
- 9.44 A mechanism shall be in place to regularly monitor, document, review, test and approve upgrades, patches or updates to all gaming-related hardware components as they become end of life, obsolete, shown to have weaknesses or vulnerabilities, are outdated or have undergone other maintenance.**
- 9.45 Appropriate release and configuration management processes with support systems shall be in place to support both software and hardware related changes.**
- 9.46 Only dedicated and specific accounts may be used to make changes.**

## 10. GAME PLAY AND MANAGEMENT (iGAMING)

### Display and Game Information

#### 10.1 The player shall be provided with accurate information to enable the player to make informed choices.

**Requirements** – At a minimum:

1. For each game, the theoretical payout shall be provided:
  - a. For games that include progressive awards, limited time awards, metamorphic elements or game-within-a-game awards, the variable contribution of such awards to the theoretical payout percentage shall be clearly disclosed;
  - b. For games which have different theoretical payout percentages for different betting options, the lowest theoretical payout percentage of all betting options shall be disclosed, as a minimum;
  - c. For games which have skill and/or strategy components, the theoretical payout percentage shall be calculated using a standard/published strategy. If there is no such standard/published strategy, the theoretical payout percentage shall be calculated using a blind strategy (random choice).
2. Games with elements of skill or strategy shall either disclose the optimal strategy or provide other information to the player that is sufficient to derive the optimal strategy.
3. For any top award that has a probability of less than 1 in 17 million to win, the probability shall be disclosed to the player.
4. For any other award that has a probability of less than 1 in 34 million to win, the probability shall be disclosed to the player.

#### 10.2 Information shall be displayed for a length of time that is sufficient for the player to understand their bet and the result of the game.

### Speed and Interruption

#### 10.3 Where speed of interaction has an effect on the player's chances of winning, the Operator shall take reasonable steps to ensure the player is not unfairly disadvantaged due to gaming system related performance issues.

#### 10.4 Service interruptions shall be responded to and dealt with in a way that does not disadvantage players.

**Requirements** – At a minimum, the gaming system shall:

1. Inform players that the speed of connection or processor may have, or appear to have, an effect on the game;
2. Recover from failures that cause interruptions to the game in a timely fashion;
3. Where appropriate, void bets;



4. Retain sufficient information to be able to restore events to their pre-failure state, if possible;
5. Return bets to players where a game cannot be continued after a service interruption.

**10.5 For all single player games, a mechanism shall be in place to require a player to complete an incomplete game before a player is allowed to participate in any other games, where possible.**

## **Peer-to-Peer Games**

**10.6 For all peer-to-peer games, the player shall be made aware of possible communication loss and the impact to the player in such an event.**

**10.7 Operators shall ensure that no programs are used to participate in peer-to-peer games with players (e.g. robots).**

**10.8 Mechanisms shall be in place to detect and prevent situations where players in peer-to-peer games may be using software/programs (e.g. robot play) to create an unfair advantage during game play.**

**Requirements** – At a minimum:

1. OLG shall require the player to enter into an agreement which clearly states that using software or programs to play games on a player's behalf is prohibited.

**10.9 A mechanism shall be in place to allow players to report suspected use of robots.**

**10.10 A mechanism shall be in place to ensure that a player cannot play against himself/herself.**

**10.11 Players shall not be unjustly treated or unfairly disadvantaged by the actions of other players.**

**10.12 Where players are unjustly treated or unfairly disadvantaged by the actions of other players, a mechanism shall be in place to detect, log and respond appropriately to this behaviour.**

## **Determination of Game Outcomes**

**10.13 All possible game outcomes (winning and losing outcomes) shall be available in each play, unless clearly explained in the rules of play.**

**10.14 The probability of game outcomes in virtual games shall be the same as in the associated live game (e.g. card games), unless the differences are set out in the rules of play and communicated to players.**

**10.15 The probability of achieving any specific game outcome shall be constant and independent of game history, player or any other factor.**

***Guidance:** The intent is to ensure that where the outcome of a game should be truly random (i.e. dice games, slot games), the outcome is not dependent or based upon any game history or other factors. This Standard is not meant to prohibit games which are based on cumulative play i.e. metamorphic games.*

**10.16 Bets shall be committed before the selection of game elements and associated game outcomes. Any wager received after the selection of game elements or associated game outcomes associated with the wager shall be voided and returned to the player.**

## **Randomness of Game Outcomes**

**10.17 A mechanism shall be in place to randomly select game elements used to determine game outcomes.**

**10.18 The mechanism used to select game elements and their associated game outcomes shall be impervious to outside influences, including: electro-magnetic interference; devices within or external to the gaming system; characteristics of the communications channel between the gaming system and the end player device; players; and the Operator.**

**10.19 Mechanical and electrical devices used to select game elements and their associated game outcomes shall meet the following:**

- a. Components shall be constructed of materials that will not degrade or impact the randomness of the selection before their scheduled replacement lifecycle;
- b. The devices shall be capable of being monitored and inspected to ensure the integrity of the device and randomness of the generated outcomes.

**10.20 The selected game elements and their associated game outcomes shall not be influenced, affected or controlled by the amount wagered, or by the style or method of play unless the conditions of play are changed and are clearly disclosed to the player.**

**10.21 The selected game elements and their associated game outcomes shall not be altered, discarded or otherwise manipulated through a secondary decision by the game program.**

**10.22 There shall be a mechanism in place to ensure that the randomness of selected game elements is not impacted by load on the gaming system.**

**10.23 Selected game elements shall not be supplied to more than one player, unless required by the rules of play.**

**10.24 Initial values and conditions shall be selected and used to seed the random selection process in a way that ensures the randomness of the resulting game outcomes, and avoids any correlation of selected game elements with elements selected by any other instances of the mechanism.**

- 10.25 Re-initialization of initial values shall be kept to a minimum. Initial values shall be reinitialized, if corrupted.**
- 10.26 Where the random selection process is interrupted, the next selection shall be a function of the selection produced immediately prior to the interruption, where possible.**
- 10.27 Any failure of the mechanism used to select game elements shall be quickly identified and responded to in an appropriate and timely manner in order to minimize the effect on players.**
- 10.28 Where there is a failure of the mechanism used to select game elements, games that rely upon that mechanism shall be made unavailable until the failure has been rectified.**

### **Automated Functionality**

- 10.29 A mechanism shall be in place to ensure that the player retains control of betting where auto-wagering functionality is provided.**

**Requirements** – At a minimum, the auto-wagering functionality shall:

1. Enable the player to choose the bet, and either the number of auto-wagering bets or the total amount to be bet.
2. Enable the player to stop the auto-wagering regardless of how many auto-wagering bets were initially chosen or how many remain.
3. Not override any of the display requirements, e.g. the result of each bet shall be displayed for a reasonable length of time before the next bet commences.
4. Enable the player to limit the dollar amount gambled and/or length of play.
5. Provide reasonable limits to the length of time auto-wagering can continue.

### **Game Management**

- 10.30 Where applicable, game interface changes made by the player shall be appropriately limited by the gaming system to ensure that information and representation of the game remains fair and accurate and in accordance with the rules of play.**
- 10.31 Rules of play shall not be changed during a game session unless the player is made aware of the change and no bets have been placed by the player.**
- 10.32 Where games have been changed, players shall be notified of the changes and the impact on the rules of play before the game is played.**
- 10.33 All game sessions shall be appropriately secured and checked for authenticity.**
- 10.34 There shall be a player inactivity time-out that automatically logs the player out or ends the player's session after a specified period of inactivity.**

## Downloadable Game Content

**10.35 All downloadable games shall be set up and provided to the player in a secure manner with all relevant information provided to the player.**

**Requirements** – At a minimum, downloadable games shall include:

1. Separate and distinct rules of play.
2. Separate and distinct security parameters.

**10.36 All critical functions, including the generation of the outcome of any game, shall be generated by the gaming system, independently of the end player device.**

**Guidance:** *The intent is for the Operator to maintain control (i.e. security, integrity) of all critical game functions.*

## Collusion and Cheating

**10.37 Mechanisms shall be in place in order to facilitate investigation of collusion and cheating and, if necessary, deactivation of player accounts or player sessions in a timely fashion when detected.**

## 11. RESPONSIBLE GAMBLING (iGAMING)

### 11.1 All lottery schemes shall be entered into willingly by the player.

**Guidance:** *The intent is to ensure that the player is not forced into game play simply by selecting the game.*

### 11.2 Players shall be provided with an easy and obvious way to set gaming limits (financial or time based) upon registration and at any time after registration.

**Requirements** – At a minimum:

1. Players shall be provided with the option to set loss and deposit limits during registration.

### 11.3 Where a gaming limit has been previously established by a player, a request to relax or eliminate that limit shall only be implemented after a cooling-off period.

**Requirements** – At a minimum:

1. The cooling-off period shall be 24 hours.

### 11.4 Where a gaming limit has been previously established by a player, it may not be relaxed by an Operator acting unilaterally, without instructions from the player.

### 11.5 Gaming limits, however imposed, shall be enforced by the gaming system.

**Requirements** – At a minimum:

1. Players shall be clearly notified that the game or gaming session has come to an end due to a gaming limit.

### 11.6 The registration page and pages within the player account shall prominently display a responsible gambling statement.

### 11.7 A mechanism shall be in place to monitor and detect game and account transactions which may indicate signs of problem gambling.

### 11.8 Players shall affirm that they are eligible to play free-to-play games and are not prohibited from playing games under Standard 3.2.

### 11.9 There shall be reasonable and appropriate breaks in play.

## 12. OTHER OPERATOR STANDARDS (iGAMING)

### General

- 12.1 Employees shall receive training appropriate to their role and be competent in carrying out their duties.**
- 12.2 The contract between the player and the OLG shall clearly state that all applicable laws must be complied with.**
- 12.3 Relevant information about the AGCO shall be displayed and easily accessible to the player.**

### Incident Management

- 12.4 The Registrar shall be notified about incidents in accordance with the established notification matrix.**

**Guidance:** *The intent is only to inform the Registrar of incidents which are of a regulatory concern. These may include:*

1. Incidents related to gaming system integrity.
2. Incidents related to security.
3. Incidents related to accounting improprieties.
4. Incidents related to cheat at play.

### Logging Management and Reporting

- 12.5 There shall be appropriate, accurate and complete records of transaction and game state and play information kept and made available for the purposes of:**

1. Ensuring timely investigations can be performed by the Registrar.
2. Capturing information needed to continue a partially complete game within a reasonably defined time.
3. Resolving disputes in a fair and timely manner.
4. Ensuring player complaints can be resolved.
5. Tracking all relevant player information (including funds information).
6. Tracking all relevant individual gaming sessions and game play information.
7. Tracking all relevant information related to events (including significant events).
8. Tracking of game enabling, disabling and configuration changes.

**Guidance:** *There should be an adequate amount of storage, capacity and retention of logged information.*

*The appropriate capacity, design and monitoring of the logging facilities should be in place to ensure that logging is not interrupted for a technical reason that could have been prevented.*

*The following are EXAMPLES ONLY of what should be recorded and logged.*

*Recorded and logged information should include the following:*

- 1. Information that could be used in investigations*
  - a. Amending player balances*
  - b. Changing game rules or pay-tables*
  - c. Changing administrator or root level access*
- 2. Player Account Information*
  - a. Player identity details (including player identity verification results)*
  - b. Account details and current balance*
  - c. Changes to account details, such as change of address, change of credit card or change of name*
  - d. Any self-imposed player protection limitations*
  - e. Any self-imposed player protection exclusions*
  - f. Details of any previous accounts, including reasons for deactivation*
  - g. Deposit/withdrawal history*
  - h. Game play history (e.g. games played, amounts bet, amounts won, progressive jackpots won, etc.)*
- 3. Gaming Session and Game Play Information*
  - a. Unique player ID*
  - b. Unique game identifier*
  - c. Game session start and end time*
  - d. Player account balance at start of game*
  - e. Amount wagered*
  - f. Contributions to progressive jackpot pools (if any)*
  - g. Current game status (i.e. in progress / complete)*
  - h. Game result/outcome*
  - i. Progressive jackpot wins (if any)*
  - j. Game end time*
  - k. Amount won*
  - l. Player account balance at end of game*
- 4. Event Information*
  - a. Player registration or player account creation and deactivation*
  - b. Changes to player registration (e.g. address) or account details (e.g. balance, player configurable parameters)*
  - c. Changes made to game parameters*
  - d. Changes made to jackpot parameters*
  - e. New jackpot created*
  - f. Jackpot retired*

- g. Large wins
  - h. Jackpot wins
  - i. Any large transfer of funds
  - j. Loss of communication with a player device
  - k. Player exclusion (including exclusion, requests to lift exclusion, and actual lifting of exclusion)
5. Significant Event Information
- a. Changes made to game parameters
  - b. Changes made to progressive jackpot parameters
  - c. New progressive jackpots created
  - d. Progressive jackpot shutdowns

**Note:** The above are examples only and are not to be considered a complete list.

**12.6 There shall be a mechanism in place to ensure that if logging is interrupted, compensating manual controls are used, where reasonable.**

**12.7 The gaming system shall be capable of providing unfettered custom and on-demand reports to the Registrar.**

**Guidance:** The intent is to ensure that the Registrar can receive information in the appropriate format when necessary.

The following are *EXAMPLES ONLY* of the types of reports that may be generated:

- a. A list of all currently (or previously) active player accounts
- b. A list of all currently (or previously) dormant player accounts
- c. A list of all accounts for which the player has currently (or previously) imposed a player protection self-exclusion
- d. A list of all accounts for which the player has currently (or previously) been excluded from the site (i.e. involuntary exclusion)
- e. A list of all accounts for which the player's funds have currently (or previously) been inactive for a period of time exceeding 90 days
- f. A list of all accounts for which one or more of the player's deposits and/or withdrawals have exceeded a configurable limit (i.e. large deposits/withdrawals). The limit shall be configurable for single transactions, as well as aggregate transactions over a defined time period.
- g. A list of all accounts for which one or more of the player's wins have exceeded a configurable limit (i.e. large wins). The limit shall be configurable for single wins, as well as aggregate wins over a defined time period.
- h. A list of all currently active gaming sessions
- i. A list of all games hosted by the website, including approved game/paytable versions

**Note:** The above are examples only and are not to be considered a complete list.



- 12.8** Information regarding specific game elements (such as a player's hand or cards) shall not be accessible during live games, unless by the player themselves.
- 12.9** The Operator shall ensure that investigators (OPP or Registrar) are able to monitor and participate in live games with players.

### **Complaints and Help Management**

- 12.10** A mechanism shall be in place to allow players to contact the Operator in a timely fashion with issues or complaints relating to their player account, funds management, game play or any matter related to compliance with the Standards and Requirements. The Registrar shall be notified of any such issues or complaints, in accordance with the established notification matrix.
- 12.11** A 'help' function shall be made readily available and easily accessible to players to provide gaming-related assistance.

## **cGAMING – ADDITIONAL STANDARDS AND REQUIREMENTS**

The following additional Standards and Requirements apply to cGaming sites.

### **RESPONSIBLE GAMBLING (cGaming)**

Following Standard 2.13, the additional Standard applies:

**2.14 Credit shall not be extended or lent to patrons to gamble.**

### **ENSURING GAME INTEGRITY AND PLAYER AWARENESS (cGaming)**

Following Standard 4.16, the additional Standard applies:

**4.17 The OLG shall establish a set of policies and procedures and provide training to support employees across all cGaming sites for consistent delivery of the lottery schemes and related activities.**

### **PUBLIC SAFETY AND PROTECTION OF ASSETS (cGaming)**

Under Standard 5.7, the following additional Requirement applies:

7. The Operator of a cGaming site offering 50 or more electronic break open ticket dispensers shall provide live surveillance monitoring at all times the premises is open to the public.

## **CASINOS - ADDITIONAL STANDARDS AND REQUIREMENTS**

The following additional Standards and Requirements apply to Casinos.

### **RESPONSIBLE GAMBLING (Casinos)**

Following Standard 2.13, the additional Standard and Requirements apply:

**2.14 Operators shall ensure that credit services provided to patrons are carried out in a responsible manner.**

**Requirements** – At a minimum:

1. Operators shall not extend credit to individuals who display problem gambling behavior.
2. If a player requests a credit limit increase, the Operator shall not increase the player's credit limit until at least 24 hours have passed since the request.

### **PUBLIC SAFETY AND PROTECTION OF ASSETS (Casinos)**

Following Standard 5.7, the additional Requirement applies:

7. The AGCO OPP Casino Enforcement Unit, a unit of the OPP Bureau assigned to the AGCO, must be provided with independent monitoring equipment with override capability within the Casino Enforcement Unit work area.

## APPENDIX A

Risk Theme	Regulatory Risk
<b>Entity Level</b>	<ul style="list-style-type: none"> <li>• Lack of appreciation and understanding of critical elements of a risk based control environment</li> <li>• Lack of defined Board mandate and independent oversight of management</li> <li>• No mechanism for reporting wrong doing</li> <li>• Inadequately documented management policies and procedures to define and align accountability skills and competence</li> <li>• Lack of understanding about expected ethical behavior</li> <li>• Lack of transparency in decision making</li> <li>• Individual knowingly fails to comply</li> </ul>
<b>Responsible Gambling</b>	<ul style="list-style-type: none"> <li>• Inappropriate advertising practices targets minors</li> <li>• Advertising is false and misleadingly deceptive to attract the public</li> <li>• Advertising deemed to promote excessive play</li> <li>• Players allowed to play excessively</li> <li>• Responsible gaming controls not designed into environment and product</li> <li>• Players are unaware of risks to problem gambling and options to self-control</li> </ul>
<b>Prohibiting Access to Designated Groups</b>	<ul style="list-style-type: none"> <li>• Individuals prohibited from games of chance have access</li> <li>• Selling product outside jurisdiction</li> </ul>
<b>Ensuring Game Integrity and Player Awareness</b>	<ul style="list-style-type: none"> <li>• Inability to regulate all components</li> <li>• Related parties winning at a higher relative percentage than the public</li> <li>• Players have insufficient information to make an informed choice</li> <li>• Game and system design lack integrity</li> <li>• Game procedures are not followed</li> <li>• Game and systems fail</li> </ul>
<b>Public Safety and Protection of Assets</b>	<ul style="list-style-type: none"> <li>• People are not safe</li> <li>• Assets and customer information are not safe-guarded</li> <li>• Unauthorized individuals have access to prohibited areas</li> </ul>
<b>Minimizing Unlawful Activity Related to Gaming</b>	<ul style="list-style-type: none"> <li>• Gaming used as a vehicle for money laundering</li> <li>• Gaming used as a vehicle for fraud or theft</li> <li>• Internal theft is occurring</li> <li>• Cheat at play materializes within the gaming environment</li> </ul>

## **APPENDIX B**

*[List to be developed as part of implementation planning]*