REGULATION FOR PRODUCT CERTIFICATION

(ONLINE GAMING SYSTEMS)

INDEX OF REVISIONS				
REV.	DATE	CHANGE DESCRIPTION	DRAFTED BY	AUTHORISED BY
00	15.05.2020	First issue	RQ	DG
01	21.05.2021	Paragraph terms and definitions amended. References to the GLI 27 certification scheme removed.	RQ	DG
02	30.07.2021	§ 5.1- 5.5 removed following Accredia findings	RQ	DG
03	14.09.2021	Modified § 5.4 -§ 5.5 -§ 5.5.1	RQ	DG
04	01.12.2021	Extension of the scheme to Greek regulation	RQ	DG
05	15.03.2022	Amendments following Accredia findings	RQ	DG
06	21.03.2022	Amendments following Accredia findings	RQ	DG
07	18.10.2022	Extension of the scheme to Danish regulation Greek Regulation Update General Revision	RQ	DG
08	11.11.2022	Amendments following Accredia document review	RQ	DG
09	01.12.2022	Amendments following Accredia document review	RQ	DG
10	31.07.2023	Amendments following internal audit findings	RQ	DG
11	15/09/2023	SIFS 2022 3 Swedish Legislation Update	RQ	DG
12	07/03/2024	Game certification duration modified/RNG certification for Greece and general revision	RQ	DG

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Summary

1. PURPOSE AND SCOPE

1.1. Purpose

This document defines the relationship between Quinel Ltd and the client organisations wishing to obtain, maintain or extend a certification of their gaming platform/game/RNG products in accordance with the requirements defined in the certification scheme that is the subject of the client's request.
The document also provides clients and interested parties with information on how Quinel manages the certification process for products.

1.2. Scope

These Rules apply to all product conformity assessment activities requested by Company Organisations wishing to obtain, maintain or extend the certification of their products in accordance with the requirements set out in the certification scheme that is the subject of the request.

2. REGULATORY REFERENCES

Reference standards for the drafting of this regulation

The reference rules of this Regulation are set out below.

- UNI CEI EN ISO/IEC 17065:2012 "Conformity assessment, requirements for bodies certifying products, processes and services"
- RG-01 REV. 05 Rules for the accreditation of Certification, Inspection, Verification and Validation Bodies - General part
- RG-01-03 REV.02 Rules for the Accreditation of Product/Service Certification Bodies
- RG-09 REV. 10 Rules for the use of the ACCREDIA Trademark
- RG-19 rev.01 - Rules for Scheme Owners seeking acceptance for accreditation by ACCREDIA of new and revised conformity assessment schemes
- PG-13-01 rev.03 - Procedure for the Initiation of Accreditation of New Conformity Assessment Schemes
- EA-1/22 A-AB: 2020 - EA Procedure and Criteria for the Evaluation of Conformity Assessment Schemes by EA Accreditation Body Members
- SIFS 2022:3 of The Swedish Gambling Authority
- Guidelines to SIFS 2022:3 of The Swedish Gambling Authority
- Decision with Reference number 79835 ΕΞ 2020 (B' 3265) entitled "Adoption of Gaming Regulation on the Organisation and Operation of online games of chance." published on 05/08/2020, as amended with the decision with reference number 56604ΕΞ 2022 (B 2185) and with the decision with reference number 67663ΕΞ 2022 (B 2483) and applicable of the Hellenic Gambling Commission (HGC)
- Decision with Reference number 79841 ΕΞ 2020 (B' 3266) entitled "Adoption of Regulation on the Technical Specification (TEP) for the Organisation and Operation of online games of chance" published on 05/08/2020, as amended with the decision with reference number 58876ΕΞ 2022 (B 2232) and applicable of the Hellenic Gambling Commission (HGC)
- Law No. 4002/2011 (A 180) Part D Chapter H entitled "Regulation of the Gaming Market" as last amended by Law No. 4635/ 2019 (A167).
- Spillemyndigheden's Certification Programme - Information Security Management System SCP.03.00.EN.2.0
- Spillemyndigheden's Certification Programme - Change Management Programme SCP.06.00.EN.2.0

3. *TERMS AND DEFINITIONS*

For the purposes of these Rules, the definitions given in UNI CEI EN ISO/IEC 17065:2012 shall apply.
In these Rules, the terms "organisation" and "company" are used to designate the entity/parties requesting and using the certification services of Quinel Limited.

In drafting this manual, reference has been made to the terminology provided in the reference standards listed in point 2.1.
A number of definitions are also provided to help understand the contents of the manual.

TERMS	DEFINITIONS
Product certification process	Set of third-party conformity assessment activities carried out by certification bodies in implementation of a specific certification scheme aimed at issuing a certificate of conformity of the product/service/process to the requirements specified in the scheme.
Certification system	Rules, procedures and management methods for carrying out the certification. The rules, procedures and management methods for implementing product, process and service certification are laid down by the certification scheme.
Certification scheme	Certification system related to specified products, to which the same specified requirements, specific rules and procedures apply.
National regulatory framework	Set of national laws, regulations and rules governing the online gambling sector in a specific country.
Online gaming system	Set of categories of objects that enable the organisation and enjoyment of online games. An online gaming system consists of the following elements: gaming platform, games, RNG.
SGA	Swedish Gambling Authority; Swedish gambling regulatory authority
HGC	Hellenic Gambling Commission - Greek gambling regulatory authority
DGA	Danish Gambling Authority. - Danish gambling regulatory authority
Audit	A systematic and independent examination to determine whether the activities carried out related to quality and the results obtained are in accordance with what has been planned and whether what has been set up is effectively implemented and suitable for achieving the objectives.
Corrective action	Activity initiated as a result of an unforeseen situation, may concern a product or a process.

TERMS	DEFINITIONS
Sampling	Action consisting in taking a sample from a batch; the most common forms are simple random sampling, stratified sampling and multiple sampling.
Sample	Element that serves as a reference for measuring the properties of the set or universe it represents. It is a fraction of a batch.
Checklist	A control list.
Conformity	Fulfilment of a requirement.
Non-Conformity	Non-fulfilment of a requirement.
Impartiality	Presence of objectivity.
Procedure	Specified way to perform a task or process.
Process	Set of related or interacting activities that transform input elements into output elements.
Review	Activity carried out to determine the suitability, adequacy and effectiveness of all the results of the verification activities carried out on the gaming platform or any part of it.
Registration	Document reporting the results achieved or providing evidence of the activities carried out.
Lead auditor	Auditor who has the skills and experience to conduct an audit independently and who has, in audit teams, the responsibility to coordinate and lead the team.
Auditor	A qualified person commissioned by the CAB, either alone or as part of a team, to assess the item to be verified.
Evaluator	Person qualified to perform or supervise compliance testing on games, random number generators (RNG) and functional requirements of gaming platforms.
Supervisor	The individual responsible for overseeing and validating certification in accordance with SCP.03.00.EN.2.0 (chap. 2.3.3) and SCP.06.00.EN.2.0 (chap. 2.3.3).
Expert	A person qualified and commissioned by the CAB, working under the responsibility of an Auditor, who provides specific knowledge or expertise with regard to the range of the activities to be verified.
Complaint	Expression of dissatisfaction, other than an appeal, expressed by a person or organisation to a conformity assessment body concerning the activities of that body, for which a response is expected.
Appeal	Request addressed by the supplier of the product to be verified by the conformity assessment body for reconsideration by that body of a decision it has made in respect of that item.
Organisation	Group, company, firm, corporation or institution, or parts or combinations thereof, whether associated or not, public or private, which has its own functional and administrative structure.

For easier reading of the SGQ documentation, a list of the acronyms and abbreviations used is given below:

Abbreviation	In full
SGQ	Quality Management System
MSGQ PRD	Quality Manual
RG	Regulation
PGP	Management Procedure
IO	Operational Instruction
AC	Corrective Action
NC	Non-Conformity
JDP	Job Description
CSI	Impartiality Safeguard Committee
CD	Deliberation Committee
DG	General Manager
DT	Technical Director
AMM	Administrative Manager
RQ	Quality Manager
ST	Technical Secretariat
COM	Sales Manager
CAB	Conformity Assessment Body
AUD	Auditor
LA	Lead Auditor
VAL	Evaluator
ESP	Expert

4. GENERAL PROVISIONS

4.1. Principles behind Quinel Ltd certifications

Quinel Limited grants its certification services to organisations that request them without any undue discrimination, financial or otherwise.
Quinel Limited employs both permanent in-house and external staff to carry out the activities necessary to issue its certifications.
Quinel Ltd, before undertaking a certification assignment, assesses its ability to carry out such activity in compliance with the reference principles and documents. Quinel Limited undertakes not to issue certifications in cases where it cannot guarantee the impartiality and independence of the certifications themselves, in compliance with the following principles:

- Impartiality
- Expertise
- Transparency
- Confidentiality

4.2. Complaints and appeals

Quinel Limited has trained all personnel who may have contact with the outside world in the proper handling of all reports of unmet needs from direct and indirect customers.
Quinel Limited has put in place a procedure to analyse and manage all complaints from customers or other parties when the service provided by Quinel Limited does not meet their expectations;Such a request can be sent to the relevant personnel using the form provided on the site https://www.quinel.com.mt/it/contatti/ under "Complaints".

4.3. Responsibility of the client Organisation

- In order to obtain and maintain a certification, the Company Organisation must comply with all the requirements of this Regulation and must consequently implement the management system enabling it to ensure the conformity of the product subject to certification with the requirements of the reference standard. In particular, in order for Quinel Limited to carry out the Audit, it is necessary for the Company Organisation to have implemented the full operation of the Management System that ensures compliance with the requirements of the reference standard.
- An Organisation that has obtained a product certification, as attested by the "Certificate of Conformity", is obliged to make use of it limited to the subject of the certification obtained or to request its extension if it wishes to expand it.
- An Organisation that has obtained certification must not use it in an improper or misleading way and must in any case use it in compliance with the requirements of these Rules.
- A Organisation that has obtained a certification receives a certificate of conformity for its product and the right to use the Quinel Limited mark within the limits defined in Regulation RG 03 PRD "Regulation for the use of the Quinel mark".
- If Quinel Limited decides to suspend or revoke a certification, the Corporate Organisation must cease using all material (advertising and otherwise) referring to such certification and return the Certificate of Conformity (in the case of revocation).
- The client Organisation is required to make available to ACCREDIA data, information and documents during the audits that ACCREDIA carries out on Quinel Limited for the purpose of granting/maintaining the accreditation of Quinel Limited.
- The client Organisation is also required to allow ACCREDIA inspectors to be present at Quinel Limited audit of the Organisation: in this case, the ACCREDIA inspector does not participate in the audit activity but is present as an observer.
- The client Organisation must promptly notify any changes and/or events that may lead to a change in the degree of conformity of the certified product with the established requirements;

5. CERTIFICATION PROCESS

5.1. Request for certification

The first contact with Quinel potential clients is usually through the Sales Manager.
If an Organisation wishes to certify one of its products as an online gaming system, it must complete the document MDP 04 02 "Application Form".
The Technical Secretariat (ST) sends the "Application" and informs the client of the following documents being available on the Quinel website:

- "Regulation for Product Certification" (RG 02 PRD);
- "Regulation for the use of the Quinel trademark" (RG 09 PRD);
- "Application Form" (MDP 04 02);

The ST verifies that all the information requested in the application form has been provided. If the result of the verification is not satisfactory, ST invites the Organisation to complete the information. If the application form is complete and contains all the information required to prepare the quotation, the Technical Director will determine the correct number of man/days according to the scheme's calculation model.

The customer may apply for the issuance of the certificate of conformity of the product (online gaming systems), in accordance with:

- All requirements of the SIFS 2022-3 regulation; requirements contained in chapters 4 to 15;
- the requirements of the Hellenic Game Commission regulations: (Decision with Reference number 79835 ΕΞ 2020 (B' 3265) entitled "Adoption of Gaming Regulation on the Organisation and Operation of online games of chance." published on 05/08/2020, as amended with the decision with reference number 56604ΕΞ 2022 (B 2185) and with the decision with reference number 67663ΕΞ 2022 (B 2483) and applicable of the Hellenic Gambling Commission (HGC) Decision with Reference number 79841 ΕΞ 2020 (B' 3266) entitled "Adoption of Regulation on the Technical Specification (TEP) for the Organisation and Operation of online games of chance" published on 05/08/2020, as amended with the decision with reference number 58876ΕΞ 2022 (B 2232) and applicable of the Hellenic Gambling Commission (HGC) and Law No. 4002/2011 (A 180) Part D Chapter H entitled "Regulation of the Gaming Market" as last amended by Law No. 4635/ 2019 (A167)).
- the requirements of the regulations of the Danish Gambling Authority regulations: Spillemyndigheden's Certification Programme - Information Security Management System SCP.03.00.EN.2.0, Spillemyndigheden's Certification Programme - Change Management Programme SCP.06.00.EN.2.0.

5.2. Certification Offer

When the review of the application form is successful, and the man-days are calculated, the offer is prepared:

- The Sales Manager, with the support of the Technical Secretariat, draws up an economic estimate based on the "Tariffs" (MDP 04 06) and using the calculation model.
- Based on the information contained in the application form, the Sales Manager prepares the "Economic offer", which is reviewed, approved and signed by DG.

The Business Manager may, in view of commercial and market requirements, apply a discount within a limit of 35%.
Any discounts granted on the tariff cannot, and must never, lead to a reduction in the duration of the audits.

Either the Sales Manager or Technical Secretariat sends the Economic Offer to the Corporate Organisation. Once countersigned, the offer becomes the certification agreement.
The Company Organisation, having signed this document for acceptance, sends it to Quinel Limited.

5.3. The certification process

The certification process adopted by Quinel consists of the following basic steps:

1. Starting the certification process.
2. Any preliminary visit.
3. Technical verification;
4. Drafting of verification reports.;
5. Review and subsequent approval of certification;
6. Issuance of the certificate.

In all the audits envisaged in the certification cycle and during the period of validity of the certification contract, the Organisation must:

- provide all the information (documented and non-documented) needed to conduct the assessment.
- Enable access to their information security management procedures.
- Enable access to its gaming platforms and online games by Quinel verification team.
- Agree on the presence and support of staff of the accreditation body during the verification.

If access is not granted, it will not be possible to proceed with the issuance of the certificate, in case of initial or renewal audit, or it will be necessary to suspend / withdraw the certification already issued.

In addition, the organisation that maintains an active product certification process with Quinel shall promptly send the latter a written notice in the following cases:

- substantial variation of the context of the certified product, such as: changes to the scope;
- revisions of the software in a way that does not guarantee the maintenance of the certified technical characteristics.

5.4. The certification schemes

The Body has adopted and implements a certification scheme covering product certification activities (online gaming systems) for:

- Certification of online gaming systems in accordance with the requirements of regulatory document SIFS 2022:3 of The Swedish Gambling Authority (Sweden)
- Certification of online gaming systems in accordance with the requirements of the regulatory documents of the Hellenic Game Commission (Greece).
- Certification of compliance with the SCP.03 programme in accordance with the regulations of the Danish Gambling Authority (Denmark)
- Certification of compliance with the SCP.06 programme in accordance with the regulations of the Danish Gambling Authority (Denmark)

The scheme has been adopted with reference to the indications of the UNI CEI EN ISO/IEC 17067:2013 standard, and can be provided upon request to the Technical Secretariat.

5.5. Non-Conformity / Corrective Actions

The findings notified to the Organisation are classified according to the relevance of the deficiencies found (level/type of NC and specific situation) in relation to the relevant regulations and technical standards.

The documents of reference for the applicable requirements are defined in the application for certification.

The classification of major and minor non-conformities and observations is given below:

Findings Classification	Definition
Major Non-Conformity	1. The absence of significant requirements set out in the relevant legislation (absolute lack of implementation). 2. Failure to meet an implicit,contractual or mandatory requirement that, based on available objective evidence, determines the non-conformity of the product/service offered by the organisation.
Minor Non-Conformity	1. The partial absence of a requirement with respect to the reference standard (lack of application and/or documentation) that, based on available objective evidence, does not affect the conformity of the product/service offered by the organisation. 2. Failure to meet an implicit or contractual requirement that, based on available objective evidence, affects the conformity of the product/service offered by the organisation in a non-significant way. 3. Failure to document a requirement under the relevant legislation, which is nevertheless implemented. 4. The non-systematic presence of events that result in non-conformity.
Recommendation	1. An aspect that does not fall under the definitions of Non-Conformity and constitutes a possible improvement in the effectiveness of the product. 2. Where there is no certain impact on conformity but only a potential risk of future non-conformity. 3. Detections of trends towards Non-Conformity. 4. Slight discrepancies in the product from normal practice, with no negative evidence found.

The Organisation shall perform a thorough root cause analysis for each recorded minor or major non-conformity. Based on this analysis, which must be recorded, the Organisation must define the relevant corrective actions (responsibilities, closure times, resources, closure assessment methods and effectiveness methods).

The Organisation shall send this analysis to Quinel Limited within the timeframe set out below:

	Type of visit	Definition and notification by (*)	Closure implementation by (*)	Verification of implementation and effectiveness through
NC Major	Every type	2 weeks	3 months	Additional visit within 3 months (*) and/or Documentary evidence review within 3 months (*) and verifications at the next visit.
NC Minor	Every type	2 weeks	3 months	Documentary evidence review within 3 months (*) and/or subsequent visit
Recommendation**)	Every type	NO	NO	subsequent visit

Notes:
(*) the timeframes established may be shorter than these depending on the specific situation detected, or longer in the event of objective reasons preventing compliance with this limit, in which case the Client must promptly inform Quinel and assess the closure timeframe.
(**) For findings classified as observations, the Organisation is not obliged to define and implement any treatments (corrections) and/or corrective/preventive actions. However, it is recommended that the organisation carefully analyses the submitted observations in order to prevent the occurrence of Non-

Conformities and/or improve the current SG. Quinel merely checks at the following maintenance visit whether and how the organisation has taken on board these observations.

5.6. Verification report

A report, the contents of which are confidential, shall be drawn up for each audit carried out, with reference to the information and data contained in the documents examined during the audit.
In any case, the document must contain at least the following information:

- Customer identification;
- Identification of the product to be audited;
- The dates of the audit;
- The composition of the audit team;
- The results of the verification including the findings made by the audit team (for each finding, the requirement not met, the description of the finding, the classification of the finding must be indicated);
- The references of the client's personnel involved in the audit activity;
- References to the relevant regulations and technical standards;
- References to any reports issued by third parties for the purpose of deciding on the compliance outcome;

The verification can identify opportunities for improvement, but should not recommend specific solutions. The verification report remains the property of Quinel.
The lead auditor or evaluator, team leader of the audit team, must ensure that the report is prepared and is responsible for its content.
For gaming/RNG certifications, the checklist used in the audit phase also has the function of a report, and therefore must contain the minimum information listed above.

5.7. Issuance of the certification

The verification report prepared by the Lead Auditor or Team Leader Evaluator is submitted to the Deliberation Committee (CD) of Quinel Ltd for its decision, in accordance with the "Operating regulation of the Deliberation Committee of Quinel Limited" (RG 07 PRD).
The deliberation is adopted considering:

- The review of the suitability, adequacy and completeness of the verification findings.
- Compliance with the requirements for impartiality and independence of the verification team and the absence of any formal defect.
- The correct application of all applicable procedures within the certification process.

Following the positive assessment of the certification deliberation phase, Quinel Ltd sends the Certificate to the client Organisation.

5.8. Contents of the Certificate of Conformity of the Quinel Limited Product

The Certificate of Conformity will contain the following information:

- name and geographical location of the Client
- date of issue of the certificate
- date of modification of the certificate
- date of expiry of the certificate
- Unique identification code (CLP-XXXX).
- reference to the regulations and technical standards in question
- definition of the product subject to certification
- The list of test reports examined, and accepted, in order to assess the conformity of the product with specific requirements, if any.
- Quinel's name, address and certification trademark.

- Reference to Quinel internal form (e.g. MDP 04 XX).
- Signature of the Director General of Quinel
- Accredia brand/logo referring to the Accreditation.

The certificate is valid for one year; at the end of which, a Renewal Audit must be carried out covering all requirements set out by the reference rules and regulations and the certificate must be reissued.

For the certification of games and RNG in accordance with Greek legislation, the certificate is issued without a validity period, as the certificate remains valid provided that no changes are made to the critical components listed in Annex I of the certificate.

5.9. Blocking the certification process

Quinel Limited may block the process when one or more of the following situations occur:

- The client Organisation fails to make the due payments to Quinel Limited in accordance with the contractual terms.
- The client Organisation engages in conduct detrimental to the image of Quinel Limited.
- Negative situations occur on the certified product and/or in the behaviour of the client Organisation, as attested by objective and serious complaints, claims and reports by those interested in the certification.
- The applicant Organisation does not implement the corrective actions or does not send the required documentation within the agreed deadlines.

In addition, Quinel Limited blocks the certification process if the client Organisation does not accept the conditions governing certification, which are set out in this RG 02 PRD Regulation.
If DT identifies a reason for blocking the certification process, they notify the company without delay.

5.10. Extensions and reductions of the certifications

5.10.1. Extensions and reductions at the request of the certified Corporate Organisation

The extension of the subject of Certification can be granted by Quinel after a verification limited to the requirements of the request. This verification will be conducted in the same manner as the initial verification.

5.10.2. Reductions on the initiative of Quinel

The client may request a reduction in the scope of the certification compared to what was initially established, provided that the product remains representative of all the technical characteristics to be certified and that the result of compliance with the relevant regulations and technical standards is not compromised.
The reduction in scope is requested by the client, endorsed by the Lead Auditor or Team Leader Evaluator and approved by the Review and Deliberation Committee.

5.11. Suspension and Revocation of the Certification

5.11.1. Conditions for the suspension of the Certification

The suspension of the certificate is a temporary measure taken by Quinel, which consists in preventing the client Organisation from using the Quinel certificate until the following conditions are met.
The suspension may not last longer than 6 months, in which case the certificate revocation measure referred to in the following section shall apply.
Quinel may suspend the certification in the following cases:

- If the client Organisation does not make payments to Quinel in accordance with the contract.
- If the client Organisation behaves in a way that is detrimental to the image of Quinel.
- If the client Organisation misuses the Quinel trademark and certificate.
- If the client Organisation makes a justified request in writing to Quinel, by e-mail.

If the applicant Organisation, after a suspension measure, adequately removes the conditions that determined its suspension and Quinel ascertains the removal with favourable results by means of an additional audit and/or examination of documentary evidence, the reinstatement of the validity of the certification is promptly activated with a proposal for removal of the suspension to the deliberation committee and subsequent communication by the Quinel General Management to the client Organisation.
The period of suspension of the certificate does not change the period of validity of the same.

5.11.2. Conditions for revocation of the Certification

A revocation of the certification involves the immediate withdrawal of the certificate by Quinel. The measure is taken when:

- The conditions referred to in the preceding sections persist for more than 6 months despite the implementation of the suspension measure.
- The severity of the client Organisation's misbehaviour, documented by indisputable objective evidence, makes it necessary to protect the image Quinel with an urgent and categorical measure.
- The client Organisation intends to take legal action against Quinel, without any prior attempt to resolve the dispute through the arbitration board in accordance with the procedure "Complaints and Appeals Management" (PG 09).

Quinel informs the client Organisation of what is described in this section by means of RG 02 PRD accepted by the Client in MDP 04 05.
If the Organisation wishes to reacquire the Quinel certificate after a revocation, the certification process will be resumed in the same way as for the first certification.

5.11.3. Certificate suspension and revocation procedure

If the Technical Director ascertains the above situations, assisted, where necessary, by additional expertise provided by auditors or sector experts, and after assessing any Corrective Actions proposed by the Company, if these are not satisfactory, the DT shall request the Deliberation Committee for suspension or revocation (using form MDP 04/22). Suspension or revocation of the certification of the Organisation will take immediate effect.
The procedure followed for the withdrawal of the certification is the same as that followed for the issue of the certification itself.
The measure of suspension or revocation and reactivation shall be notified in writing by registered letter with return receipt or by e-mail with confirmation of receipt to the client Organisation concerned within 15 days of the date of the decision.
Suspension or renunciation can be requested by the certified Organisation, notifying Quinel by registered letter with return receipt or by e-mail with confirmation of receipt.
The maximum duration of self-suspension is 6 months.

5.12. Special inspection visits

Quinel reserves the right, justified in writing to the Organisation, to carry out additional or special visits, which may occur, for example:

- To verify the implementation and effectiveness of treatments (corrections) of non-conformities and corrective/preventive actions implemented by the organisation.
- In response to needs arising during the issuing of the certificate.
- For the purpose of lifting the suspension of the certificate.
- Following changes made by the organisation to its system and considered relevant by Quinel.
- As a result of reports or complaints received, considered to be particularly significant concerning the certified system and its compliance with the reference standards and this Regulation.
- Extension of the scope.

This type also includes visits at short notice, verifications carried out in order to investigate complaints, or following notification of changes by the client or as a follow-up action with regard to clients whose certification has been suspended and for which it must check that the same refrain from further advertising the certification. In such cases:

a. Quinel describes and makes known in an offer to certified clients the conditions under which these visits are carried out at short notice; and
b. Quinel takes particular care in appointing the verification team because of the lack of possibility for the client to object to the members of the verification team.

If the Organisation refuses the special audits, without good reason, Quinel can start the certification suspension process.

All costs relating to any special verifications shall be borne by the Organisation, with the exception of special verifications following reports or complaints, which shall be borne by the Organisation only if they are considered justified by Quinel.

On completion of the visit, the Lead Auditor or the Team Leader Evaluator hands over a copy of the visit report to the Organisation. Quinel reviews the issued report and, if there are no issues to be resolved, confirms it to the organisation, otherwise the Lead Auditor or Team Leader Evaluator is asked to address the issues of doubt and/or lack of evidence.

6. *ANNEXES*

- SC Scheme for the certification of the product "online gaming systems"