eCOGRA

ECOGRA GENERALLY ACCEPTED PRACTICES (EGAP)

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A   **INTRODUCTION**

The underlying philosophy of eCOGRA is based on the achievement of the objectives of player protection, fair gambling and responsible conduct by operators and relevant service providers. In doing so, it is important that the requirements within this document do not place unnecessary constraints on the seal holder's operations.

The required policies and procedures are documented as eCOGRA Generally Accepted Practices (eGAP) Requirements. The latest release of the eGAP Requirements considers the compliance requirements of various regulated markets and, where appropriate, encompasses the CEN Workshop Agreement 16259:2014 Responsible Remote Gambling Measures, the European Commission's 2014 Recommendation for the common protection of consumers of online gambling services in the EU, the European Parliament's Fourth European Union Anti-Money Laundering Directive, industry relevant information security requirements as outlined in ISO/IEC 27001:2013 and privacy principles as outlined in the EU General Data Protection Regulation (GDPR).

Ultimately, this document aims to set out the most appropriate policies and procedures to ensure that players are playing games that are fair and honest. The eGAP Requirements also make provisions relating to the safety of players' deposits and pay-outs which may be affected, to the players' detriment, by the laws of the jurisdictions in which the player resides. These eGAP Requirements should not be relied upon for any assurances in relation to 3rd parties and/or activities which are not covered by the scope of the eGAP Requirements, and are therefore not reviewed by eCOGRA, such as payment processors, web wallets and affiliate programs.

The eGAP Requirements are made on the assumption that the seal holder, or applicant, is not prevented from carrying out the required processes and controls by any law that exists in the jurisdiction where the player is located.

This document is intended primarily, as a guideline, to define and communicate the eGAP Requirements to which potential eCOGRA seal holders must comply. In addition, this document will be used as a guideline by eCOGRA to establish the testing requirements that will be applicable to a software provider, an operator, or a service provider within the industry.

The following is indicated for each of the eGAP areas:

1) *Objectives* outline the expected results of having adequately implemented the underlying eGAP Requirements.
2) *Methodology* describes the approach, timing, and techniques adopted by eCOGRA , to obtain sufficient assurance that the seal holder adheres to the eGAP Requirements.
3) *eGAP Requirements* dictate the mandatory policies and procedures which must be adhered to for the achievement of the eCOGRA seal.

The eGAP Requirements that may be applicable to software providers and operators have been indicated, within each eGAP area, as follows:

1) For *software providers* with a ✔ in the **SP** column.
2) For *operators* with a ✔ in the **O** column.

The risk indicators assigned to the eGAP Requirements are subjective and are provided for guidance purposes only.

The eGAP Requirements are applicable to different products, within each eGAP area, and indicated as follows:

All − All products   *C − Casino*   *P − Poker*   *S − Sportsbook*   *B − Bingo*

Notwithstanding the products and services provided by software providers have similarities, it is important to note that a clear distinction can be made between software providers through the service agreements they have with operators. For example, the backup responsibilities may be assumed by one software provider, while not by another. Therefore, software providers, service providers and operators should only apply the indications in this document as a guideline to identify implementation areas for which they are responsible.

Recent changes to the eGAP Requirements may not yet be operative on all sites as software providers and operators are provided with a transitional period in which to implement new requirements and updates.

B   GLOSSARY

Term	Definition
Backup	A backup, or the process of backing up, refers to the copying of virtual files or databases to a secondary site for preservation so that data may be restored after a data loss event or other catastrophe. Backups may be performed using mirroring technology, system snapshots, cloud storage, physical tapes and disks, etc.
Business continuity	The process of getting the entire business back to full functionality after a crisis by following an operational plan that lets a business operate with minimal or no downtime or service outage.
Consent	Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
Data processing agreements	A written contract, or other binding legal document which sets out the subject matter and duration of the processing, the nature and purpose of the processing, the type of personal data to be processed, how to store the personal data, the detail of the security surrounding the personal data, the means used to transfer the personal data from one organisation to another, the means used to retrieve personal data about certain individuals, the method for ensuring a retention schedule is adhered to, the means used to delete or dispose of the data, the categories of data subjects and the obligations and rights of the controller.
Network security review	An ethical exercise performed using vulnerability scanning tools and penetration tests to identify vulnerabilities that may exist in the internal or external network defences.
Privacy statement	A statement that describes how the organisation collects, processes, secures, discloses, and retains personal data. A privacy statement is sometimes referred to as a fair processing statement or a privacy policy.
Right to erasure ('right to be forgotten')	The right of data subjects to have personal data erased and to prevent processing of personal data in the following circumstances: • Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed • When the individual withdraws consent • When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing • The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR) • The personal data has to be erased in order to comply with a legal obligation.

Term	Definition
Unauthorised activity	Any activity that contravenes laws and regulations and what the players have agreed to within the Terms and Conditions and the Privacy Statement on the website.
Website	A set of data and information about a particular subject which is available on the Internet through the use of multiple devices such as desktops, laptops, mobile phones, tablets, etc.

C   eGAP REQUIREMENTS

The eGAP Requirements are documented below and embody the objectives of player protection, fair gambling, and responsible conduct by. The eGAP Requirements incorporate information technology system compliance requirements, as well as supporting automated and manual processes.

1	RESPONSIBLE GAMBLING

OBJECTIVE:

Seal holders are committed to promoting socially responsible gambling, and working with players, employees, and relevant industry stakeholders to help combat problem gambling. Seal holders should ensure that proper controls are established, implemented, and enforced, and that gambling takes place in a responsible environment.

METHODOLOGY:

eCOGRA shall ensure that seal holders meet these requirements by reviewing the seal holders' websites and acceptable financial and control practices used to meet this objective.

MINIMUM REQUIREMENTS:

Ref		Risk Indicator	Products	SP	O
	Responsible Gambling				
1.01	The homepage of the operator's website shall contain a clear link to a Player Protection and Responsible Gambling page, which shall contain at a minimum:				
1.01.1	Detail of the operator's responsible gambling policy and their commitment thereto.	Low	All		✔
1.01.2	A warning statement that gambling could be harmful if not controlled and kept in moderation.	Low	All		✔
1.01.3	Advice on responsible gambling and a link to sources of help on problem gambling, including helpline numbers.	Low	All		✔
1.01.4	An accepted and simple self-assessment process to determine risk potential.	Low	All		✔
1.01.5	The player protection measures offered by the operator (including, amongst others, deposit limits, cooling-off and self-exclusion) and instructions on how to access these measures.	Low	All		✔
1.01.6	No display of promotional material and no misleading messages of an operator's support of responsible gambling.	Low	All		✔
1.02	The download gambling software shall contain a link to the Responsible Gambling page.	Low	All	✔	✔
1.03	Direct communication with the player shall carry a responsible gambling message, where practicable.	Low	All		✔
1.04	A clock shall be available on the screen at all times.	Low	All	✔	✔
1.05	The denomination of each credit shall be clearly displayed on the games screen and the currency unit shall be clearly stated where multiple currency game play is available.	Low	All	✔	✔
1.06	Players shall be able to access their account history dating back for a minimum period of sixty days and shall be provided offline access dating back for a minimum period of twelve months,	Medium	All	✔	✔

Ref		Risk Indicator	Products	SP	O
	including all deposits, withdrawals, wagers, wins, losses, fees, and bonuses.				
1.07	Free play websites shall provide links to the same age restriction, responsible gambling, and player protection information as the real money website.	Low	C P B		✔
1.08	Information concerning age limits, responsible gambling, and player protection shall be provided in each language offered by the website.	Low	All		✔
Responsible Gambling Limits					
1.09	The operator shall provide players with the option to set their own deposit limits per day, week, and month.	Medium	All	✔	✔
1.10	Operators shall deal with requests to decrease deposit limits immediately. Player requests to increase previously set deposit limits shall only be effective after a minimum waiting period of 24 hours.	Low	All		✔
1.11	There shall be a clear link from the deposit page to the facility to set deposit limits and/or to the Responsible Gambling page.	Low	All	✔	✔
1.12	The Responsible Gambling page shall provide players with an option to set a 'cooling off' exclusion period of at least 24 hours.	Low	All		✔
1.13	Best endeavours shall be made to prevent marketing to players during their 'cooling-off' period.	Low	All		✔
1.14	The Responsible Gambling page shall provide players with an option to 'self-exclude' in accordance with the following:				
1.14.1	The account shall be locked and any funds in the account paid out, subject to appropriate and necessary checks and verifications.	High	All		✔
1.14.2	Best endeavours shall be made to ensure that the player does not receive any marketing material during the exclusion period.	Medium	All		✔
1.14.3	Self-exclusion due to a gambling addiction shall be for a minimum period of 6 months.	High	All		✔
1.14.4	A third party making an application for a player's exclusion shall be properly identified. Based on the circumstances, the appropriate manager shall contact the player for whom the exclusion is being sought and take appropriate action.	Medium	All		✔
1.14.5	Self-exclusion requests shall apply to all brands and products offered by the operator.	High	All		✔
1.14.6	Players with a self-excluded status shall not be able to deposit or wager with the operator.	High	All		✔
Responsible Gambling Practices					
1.15	Training shall be provided to appropriate employees on responsible gambling. Refresher courses shall be undertaken as and when needed.	Low	All		✔
1.16	A player shall not be given credit (other than through the provision of a promotion or bonus) unless the regulatory	Low	All		✔

Ref		Risk Indicator	Products	SP	O
	authority permits such practice. Adequate measures shall be taken to establish the financial standing of the player and the player shall clearly consent to honour consequential debts.				
1.17	Each operator shall appoint a designated senior management employee to assume responsibility for the implementation and monitoring of responsible gambling practices.	Low	All		✔
1.18	Relevant third party and business partner contractual terms and conditions shall provide the operator the right to terminate the contract where that third party's conduct conflicts with the operator's responsible gambling program.	Low	All		✔
1.19	Player behaviour suggestive of problem gambling should be proactively investigated by the operator.	Medium	All		✔
1.20	Responsible gambling functionality used by the gambling platform shall be subject to regular internal quality testing.	Medium	All	✔	✔

2 PLAYER INFORMATION AND UNDERAGE PROTECTION

OBJECTIVE:

Seal holders should seek to implement all reasonable measures that prevent underage individuals from accessing gambling products. Seal holders should ensure these measures address appropriate age verification, and with help from industry stakeholders and governments, work to maximise the coverage, quality and effectiveness of near real-time verification.

METHODOLOGY:

eCOGRA shall ensure that seal holders meet these requirements by reviewing the seal holders' websites and acceptable financial and control practices used to meet this objective.

MINIMUM REQUIREMENTS:

Ref		Risk Indicator	Products	SP	O
	Underage and Illegal Gambling				
2.01	The homepage of the operator's website shall clearly display a 'no under 18's' sign or an age restriction determined by the regulatory authority, which links through to a clear message about underage play.	Medium	All		✔
2.02	The operator's Responsible Gambling page shall provide a link to a recognised filtering programme to assist players/parents in preventing underage individuals from using gambling sites.	Low	All		✔
2.03	A legal disclaimer shall be displayed on the operator's website stating that no player below the legal age of gambling is legally permitted to participate in Internet gambling.	Low	All		✔

Ref		Risk Indicator	Products	SP	O
2.04	The registration process shall include a clear message regarding underage play.	Low	All		✔
2.05	Player registration shall require the player to provide the following minimum information: name, date of birth, address and unique username and password details.	Low	All		✔
2.06	Age and player verification shall be conducted in accordance with a formal documented process and shall include operator and third-party verification checks, where feasible and available.	Low	All		✔
2.07	Free play games shall not award cash or cash equivalents unless the players have been successfully age verified.	Low	All		✔
2.08	If player contact details are required prior to being allowed to "play for free", the operator shall obtain a confirmation of the player's age.	Low	All		✔
2.09	Operators shall have a clear documented policy which is applicable if an underage individual is identified.	Low	All		✔
2.10	Operators shall immediately lock the account of any person suspected or confirmed of being an underage individual found to have accessed its services.	Low	All		✔
2.11	The operator shall implement an appropriate policy for refunding the value of all deposits should a player, after registration, be identified as an underage individual.	Low	All		✔
2.12	Best endeavours by the operators shall be made to prevent advertising that is targeted towards underage individuals and gambling adverts or promotional material shall not portray any underage individuals.	Low	All		✔
2.13	Training shall be provided to all employees involved in the operator's age verification process, including training on the process to follow if a need for additional verification is identified.	Low	All		✔

3   ANTI-MONEY LAUNDERING (AML) AND COUNTER FINANCING OF TERRORISM (CFT)

OBJECTIVE:

Seal holders should ensure that strict security measures and gambling supervision is implemented and enforced to prevent fraudulent player activity. Any player transactions suspected of being potentially connected to money laundering, the financing of terrorism or other criminal activity should be reported in compliance with the requirements of the relevant regulatory authority.

METHODOLOGY:

eCOGRA shall ensure that seal holders meet these requirements by reviewing the seal holders' websites and acceptable financial and control practices used to meet this objective.

MINIMUM REQUIREMENTS:

Ref		Risk Indicator	Products	SP	O
	AML and CFT				
3.01	Operators shall implement an AML and CFT policy formulated on a risk-based approach. The AML and CFT policy shall be approved and supported by senior management and shall provide reasonable security measures to prevent transactions which are potentially connected to money laundering and the financing of terrorism.	Medium	All		✔
3.02	Each operator shall appoint a designated senior management employee with suitable qualifications and experience to assume responsibility for the implementation and monitoring of AML and CFT systems.	Low	All		✔
3.03	AML and CFT control requirements between operators and relevant service providers shall be clearly defined.	Low	All		✔
3.04	Training and guidance shall be provided to relevant employees on the operator's policy to ensure the prompt identification, escalation and reporting of fraud, data protection measures and AML and CFT practices.	Low	All		✔
3.05	No cash shall be accepted to fund an account.	Medium	All		✔
3.06	Transfers of funds between players' accounts shall be conducted through a formal documented process in compliance with the operator's AML and CFT policy.	Medium	All		✔
3.07	The operator's terms and conditions shall state the requirements applicable to funds transferred between players.	Low	All		✔
3.08	AML and CFT policies and procedures shall be in place for the identification, escalation, and reporting of unusual or suspicious activities, including investigating material or unusual deposits, withdrawals, and player accounts where little or no gambling activity takes place.	Low	All		✔
3.09	The operator's AML and CFT practices shall include the provision of suspicious transaction reports to the relevant national financial investigation unit and international institutions.	Low	All		✔
3.10	No deposits or pay-outs shall be made to a player's account if there is reason to suspect money laundering or terrorist activity unless reviewed and authorised by the Anti-Money Laundering Reporting Officer.	Low	All		✔
3.11	Where the deposit or pay-out exceeds both €1,000 and the amount prescribed by the relevant licensing authority (whether in a single transaction or a series of transactions which appear to be linked), no payment shall be made until the operator can positively identify the player.	Medium	All		✔
3.12	A legal disclaimer shall be displayed on the operator's website stating that any criminal or suspicious activities may be reported.	Low	All		✔
3.13	All employees shall be made aware of their personal obligations to detect and report criminal and suspicious behaviour as well as the	Low	All	✔	✔

Ref		Risk Indicator	Products	SP	O
	dangers of 'tipping-off' and the procedures to be followed to ensure it does not happen.				
3.14	Operators shall take appropriate measures to protect employees who report suspicions of money laundering or terrorist financing either internally or to an independent third-party body.	Low	All		✔
3.15	Records of player financial transactions shall be retained for a minimum period of 5 years or in accordance with the retention requirements of the operator's regulatory authority.	Medium	All	✔	✔
3.16	All information regarding changes to player details shall be logged and appropriate verification documentation shall be requested for significant changes (e.g. changes to players' names and banking details).	Medium	All	✔	✔
3.17	Funds shall be remitted by the operator to the player only to the same payment mechanism from which the funds originated, except where changes to the payment mechanism are substantiated.	Medium	All		✔
3.18	Player verification documents shall be retained in accordance with the retention requirements of the operator's regulatory authority.	Low	All		✔
3.19	Technical and organisational measures shall be in place to protect player data against accidental loss, alteration, unauthorised disclosure or access and unlawful destruction.	Low	All	✔	✔
3.20	Service providers shall ensure that the confidentiality of player data and sensitive information collected shall be accessible only by designated individuals requiring such access.	Low	All	✔	✔

4   PROTECTION OF PLAYER PRIVACY AND SAFEGUARDING OF INFORMATION

OBJECTIVE:

Seal holders should ensure that the privacy and confidentiality of all player information submitted at any point in time is maintained and protected from unauthorised or unnecessary disclosure.

METHODOLOGY:

eCOGRA shall ensure that seal holders meet these requirements by reviewing the seal holders' websites and acceptable financial and control practices used to meet this objective.

MINIMUM REQUIREMENTS:

Ref		Risk Indicator	Products	SP	O
	Privacy of Player Information				
4.01	The organisation shall take appropriate measures to comply with relevant data protection regulations.	Medium	All	✔	✔

Ref		Risk Indicator	Products	SP	O
4.02	The operator shall display a privacy statement on the website stating when information is collected, the minimum information that is required to be collected, the purpose for information collection, the conditions under which information may be disclosed/shared, the controls in place to protect the information from unauthorised or unnecessary disclosure, the rights of the players and contact details for where any questions/ complaints should be directed.	Low	All		✔
4.03	Operators shall provide their privacy statement for the relevant languages offered, through an appropriate channel.	Low	All		✔
4.04	Player consent for the collection, processing, and storage of personal information shall be obtained through the acceptance of the operator's terms and conditions and privacy statement prior to successful registration.	Medium	All		✔
4.05	The organisation shall have a process in place to manage requests from players for the right to erasure.	Medium	All		✔
4.06	Where player data is shared with third parties, the operator shall ensure that formal data processing agreements are in place.	Medium	All	✔	✔
	Protection of Player Information				
4.07	Player credit card numbers stored on the system shall be secured from unauthorised use.	High	All	✔	✔
4.08	Players shall be provided access to their personal information. The operator shall take all reasonable steps to ensure that any information supplied by players is accurate, reliable, and kept up to date.	Low	All		✔
4.09	Director, officer, and employee contracts shall contain a "confidentiality" clause prohibiting the unauthorised or unnecessary disclosure of player information.	Medium	All	✔	✔
4.10	The operator shall make a written commitment not to abuse its relationship with the player by any unauthorised activity on the player's computer system.	Medium	All	✔	✔

5 PROTECTION OF PLAYER FUNDS

OBJECTIVE:

Seal holders should ensure prompt and accurate processing of deposits, winnings and payment requests, subject to appropriate and necessary checks and verification.

METHODOLOGY:

eCOGRA shall ensure that seal holders meet these requirements by reviewing the seal holders' websites and acceptable financial and control practices used to meet this objective.

MINIMUM REQUIREMENTS:

Ref		Risk Indicator	Products	SP	O
	Receipt from and Payment to Players				
5.01	Preventative and detective controls and technology shall be in place to ensure that the prospect of players registering from jurisdictions specifically excluded by the operator is prevented.	Low	All	✔	✔
5.02	The operator's website terms and conditions shall state that only players legally permitted by their respective jurisdiction may participate in gambling activities.	Low	All		✔
5.03	All receipts from and payments to players shall be conducted through a formal documented process.	Low	All		✔
5.04	Registration, deposit and withdrawal conditions and procedures shall be clearly communicated to players.	Low	All		✔
5.05	The detection and correction of timeout receipts shall be conducted in accordance with a formal documented process.	Medium	All		✔
5.06	Operators shall ensure prompt and accurate processing of payments, including jackpot wins, subject to appropriate and necessary checks and verifications.	High	All		✔
5.07	All information regarding receipts and payments shall be logged and retained by the applicable parties.	Medium	All	✔	✔
5.08	Financial reconciliations performed for payments and receipts shall be reviewed and approved.	Medium	All		✔
5.09	Player account related queries shall be promptly addressed.	Medium	All		✔
5.10	The locking of player accounts shall be conducted through a formal documented process.	Low	All		✔
5.11	Any uncontested funds left in an account, previously de-activated by the operator, shall be remitted to the owner of the funds upon request and subject to published terms and conditions.	Medium	All		✔
	Operator Liquidity				
5.12	The operator's liability for player balances, pending cash-ins and guaranteed prizes shall be separately identifiable at any point in time, and operators shall demonstrate sufficient cash and cash equivalents to settle these balances.	High	All		✔
5.13	Effective risk control mechanisms shall be in place for managing events offered, maximum bet sizes and prices, taking into consideration available cash and cash equivalents.	Medium	S	✔	✔
5.14	Any increases in maximum bet sizes set by the operator shall be appropriately authorised.	Medium	All		✔
	Player Funds				
5.15	If the operator adopts a policy of clearing inactive accounts, then players shall be informed prior to clearing of the account, and this policy shall be clearly stated in the operator's terms and conditions. Records shall be maintained for all purged player accounts.	Medium	All		✔
5.16	Any negative manual adjustments made to active player accounts and administrative adjustments processed against inactive player accounts shall be reviewed and authorised by management.	Low	All	✔	✔

Ref		Risk Indicator	Products	SP	O
	Multi Operator Network Fund Management				
5.17	Multi-operator network funds shall be managed and paid out by a reputable party.	Low	C P B	✔	✔
5.18	Multi-operator network fund accounts shall always be in credit and any exceptions shall be documented and authorised.	Medium	C P B	✔	✔
5.19	The liability for multi-operator network wins, prizes, bonuses, and guaranteed amounts shall be clearly defined and documented.	Medium	C P B	✔	✔
5.20	No progressive jackpots shall be paid unless appropriate verification is received.	Low	C P B	✔	✔
5.21	Progressive jackpot wins shall be paid out within a reasonable period.	Medium	C P B	✔	✔
5.22	Surplus funds requested by operators shall be paid out within a reasonable period.	Low	C P B	✔	✔

6	RIGOROUS INDEPENDENT ASSESSMENT OF GAME FAIRNESS

OBJECTIVE:

Seal holders are committed to ensuring that gambling products are subjected to continuous and rigorous independent assessment to ensure products continue to operate in a fair manner, and in accordance with published game rules.

METHODOLOGY:

eCOGRA shall ensure that seal holders meet these requirements by reviewing the seal holders' software, gaming data, websites and acceptable financial and control practices used to meet this objective. Where applicable, the average pay-out percentage (being the percentage of winnings to wagered amounts) shall be regularly reviewed. The final results output of the random number generator shall be reviewed and shall incorporate appropriate statistical tests.

MINIMUM REQUIREMENTS:

Ref		Risk Indicator	Products	SP	O
	Data Monitoring and Analysis				
6.01	Operators shall implement a product testing policy, approved, and supported by its senior management, which shall provide for the internal and external testing of all products for fairness and randomness.	Medium	C P B	✔	✔
6.02	All slots, video poker and table games shall have a theoretical / estimated statistical return to the player of at least 90% using optimal game play strategy.	Low	C	✔	✔
6.03	All slots, video poker and table games shall have a combined average actual statistical return to player of at least 92%.	Low	C	✔	✔

Ref		Risk Indicator	Products	SP	O
6.04	Final result output-based testing of fairness and randomness of products shall be conducted prior to, and subsequent to the live implementation of the games.	High	C P B	✔	✔
6.05	The core RNG design and implementation shall be evaluated by an accredited testing agency prior to live operation, or following any changes to the RNG source code, including:				
6.05.1	RNG documentation review.	High	C P B	✔	
6.05.2	RNG source code review.	High	C P B	✔	
6.05.3	RNG mathematical analysis.	High	C P B	✔	
6.05.4	RNG range determination.	High	C P B	✔	
6.05.5	RNG period assessment.	High	C P B	✔	
6.05.6	Seeding/re-seeding investigation.	High	C P B	✔	
6.05.7	Background cycling investigation.	High	C P B	✔	
6.06	All major changes shall be individually tested, and a system-wide regression test shall be completed at least annually.	Medium	C P B	✔	
6.07	Pay-out percentage reviews shall be conducted on a regular basis to verify the final result actual return to the player against the theoretical statistical return percentage.	Medium	C	✔	✔
6.08	The financial data log files shall be reconciled to movements on the accounts, or equivalent procedures conducted, to ensure accuracy and completeness of data used in final result pay-out percentage and RNG testing.	Medium	C P B	✔	✔
6.09	The theoretical statistical return percentage for a particular game type shall be no less than that of the equivalent game in free play mode.	Medium	C	✔	
6.10	The final result obtained through the use of the RNG in games shall be proven to be:				
6.10.1	Statistically independent.	High	C P B	✔	
6.10.2	Uniformly distributed over their range.	High	C P B	✔	
	Game Rules				
6.11	The design and operation of games shall be strictly in accordance with the specified game rules and shall not deviate from those rules. This shall be tested either internally or externally on an annual basis.	Low	All	✔	✔
6.12	Game rules shall be made available to the player at all times. Changes to game rules shall be date-stamped.	Medium	All	✔	✔
6.13	The game pay tables shall be available to the player during applicable games of chance.	Medium	C	✔	✔
6.14	A game and betting event shall follow a constant set of rules and shall at no time deviate from those rules. A rule change shall constitute a different game or betting event, although variations to the maximum number of bets per game are permitted.	Medium	All	✔	✔
6.15	Betting odds shall be calculated in a consistent manner, and changes to pay tables, game rules and betting odds shall not be affected retrospectively.	Medium	All	✔	✔

Ref		Risk Indicator	Products	SP	O
6.16	Operators shall provide game and betting rules for the relevant languages offered, through an appropriate channel.	Low	All	✔	✔
6.17	The rake schedule shall be prominently displayed on the operator's website and shall not be unreasonably altered.	Low	P	✔	✔
6.18	The rake applicable to a game shall be clearly displayed for the duration of game play.	Low	P	✔	✔
	Unfair Influence				
6.19	Preventative and detective controls or technology shall be in place to ensure that the prospect of cheating through collusion (external exchange of information between different players) is prevented.	Medium	P	✔	✔
6.20	Operator terms and conditions shall prohibit players from using bots in poker rooms. Operators shall ensure that procedures are in place to monitor and terminate the use of bots in the poker rooms.	Low	P	✔	✔
6.21	There shall be procedures in place for identifying suspicious sports betting transactions and patterns which might pose a threat to the integrity of the event outcome. Where a threat is identified, a procedure for notifying the relevant sporting body or regulatory authority shall be in place in line with applicable data protection requirements.	Low	S		✔
6.22	If an operator has reason to believe or to suspect that an interruption has been caused, or a transaction has been affected by illegal activity, the operator may withhold payment to the relevant players pending further investigation.	Low	All	✔	✔

7   RESPONSIBLE ADVERTISING AND PROMOTIONS

OBJECTIVE:

Seal holders should endeavour to employ well balanced advertising and marketing campaigns in line with responsible gambling good practices.

METHODOLOGY:

eCOGRA shall ensure that seal holders meet these requirements by reviewing the seal holders' websites, monitoring advertising campaigns on an ad-hoc basis and acceptable financial and control practices used to meet this objective.

MINIMUM REQUIREMENTS:

Ref		Risk Indicator	Products	SP	O
	Advertising and Promotions				

Ref		Risk Indicator	Products	SP	O
7.01	Advertising shall contain factually correct information and shall not be false or misleading, particularly with regard to player winnings.	Medium	All	✔	✔
7.02	Adverts shall not entice underage individuals to gamble and shall not be displayed in media that is clearly targeted at underage individuals.	High	All		✔
7.03	Players shall not be encouraged to chase their losses; or following a win be misled that continued play will guarantee further wins; and at no time should it be suggested that gambling is a means of solving financial difficulties.	Low	All		✔
7.04	Advertising and promotional content shall be within the spirit of responsible gambling.	Medium	All		✔
7.05	The eCOGRA seal shall only be used by the relevant organisation if specifically authorised.	Low	All	✔	✔
7.06	Promotional activities shall not mislead the player by omitting important information. Significant terms and conditions applicable to the promotional activity shall be accessible at most via a direct link from the promotional offer. The significant terms and conditions shall link directly to any other terms and conditions relevant to the promotional activity.	Low	All		✔
7.07	Terms and conditions applicable to promotional activities shall be displayed with a date and time stamp, and shall not be unreasonably altered subsequent to the wagering activity.	Low	All		✔
7.08	Direct advertising and promotional communication shall carry an age restriction warning where practical.	Low	All		✔
7.09	Email and SMS advertising and bonus offers shall have an unsubscribe or opt-out facility.	Low	All		✔
7.10	Operators shall ensure that an affiliate and/or third party performing advertising on their behalf is aware of and is willing to take appropriate steps to abide by these responsible marketing requirements.	Medium	All		✔
7.11	In the event that an operator becomes aware of an affiliate or third party behaving in a manner that contravenes the eGAP requirements and has an adverse effect on players, the operator shall take reasonable steps to ensure that the affiliate ceases that behaviour, or the affiliate contract is terminated.	Medium	All		✔

8   COMMITMENT TO PLAYER SUPPORT

OBJECTIVE:

Seal holders are committed to providing players with an enjoyable gambling experience with access to 24/7 support, where they can be assured of timely attention to complaints and resolution of disputes.

METHODOLOGY:

eCOGRA shall ensure that seal holders meet these requirements by reviewing the seal holders' websites and acceptable financial and control practices used to meet this objective.

MINIMUM REQUIREMENTS:

Ref		Risk Indicator	Products	SP	O
	Player Complaints and Disputes				
8.01	Contact information for complaints and dispute resolution shall be readily accessible on the operator's websites.	Medium	All		✔
8.02	Players shall be able to log complaints and disputes on a 24/7 basis.	Low	All		✔
8.03	Where possible websites shall aim to provide assistance and guidance to all players on complaints and disputes in the same language as the content of the site.	Low	All		✔
8.04	All disputes received from players shall be dealt with in a timely manner and conducted through a formal documented process.	Low	All		✔
8.05	Operators shall keep records of all player correspondence relating to complaints and disputes for an appropriate period.	Low	All		✔
8.06	An independent third party should be available for mediation or resolution of disputes.	Low	All		✔
8.07	The third party should be required to keep records of all player correspondence relating to a dispute for an appropriate period.	Low	All		✔

9 RESPONSIBLE CONDUCT IN A SECURE, SAFE AND RELIABLE ENVIRONMENT

OBJECTIVE:

Seal holders should operate gambling products within an internal control environment that is in line with good practice. The internal control environment must support a secure, safe, and reliable environment through adequate governance, monitoring and continuity provisions.

METHODOLOGY:

eCOGRA shall ensure that seal holders meet these requirements by reviewing the seal holders' websites and acceptable financial and control practices used to meet this objective.

MINIMUM REQUIREMENTS:

Ref		Risk Indicator	Products	SP	O
	Governance				
9.01	Operators shall appoint appropriate compliance personnel who will assume responsibility for compliance with the eGAP Requirements.	Low	All	✔	✔

Ref		Risk Indicator	Products	SP	O
9.02	Operator websites shall prominently display date-stamped contractual terms and conditions applicable to gambling activities, which shall be available to print or download at any time.	Medium	All		✔
9.03	Operators shall have a legal license to operate in their respective jurisdiction and have satisfied appropriate probity requirements.	High	All		✔
9.04	Operators shall identify their licensing jurisdiction on their sites.	Medium	All		✔
9.05	Operators shall keep records of financial transactions in accordance with the retention requirements of their regulatory authority.	Medium	All		✔
9.06	Operators shall maintain financial information in a manner that will allow for the timely preparation and audit of financial statements and accounting records.	Low	All		✔
9.07	Operator management shall take responsibility for the content of annual financial statements and shall provide formal confirmation on an annual basis that financial statements for operations conducted by the operator are fairly presented in accordance with the relevant accounting framework and applicable laws.	Medium	All		✔
9.08	Operators shall have their financial statements and accounts audited by an independent audit firm, where required to do so by their licensing jurisdiction.	Low	All		✔
Minimum Security Requirements					
9.09	Security policies and procedures shall be documented, communicated to employees and relevant third parties, and reviewed at least annually or in the event of material changes.	Low	All	✔	✔
9.10	All new employees and, where relevant, new contractors shall receive appropriate information security awareness education and training during the induction and onboarding process.	Medium	All	✔	✔
9.11	All employees of the organisation and, where relevant, contractors shall receive appropriate refresher information security awareness education and training at least annually or when significant changes occur.	Medium	All	✔	✔
9.12	Security policies and procedures shall be implemented and monitored. Risk-based internal and external network security reviews shall be conducted at least annually or in the event of material changes, and appropriate measures shall be taken to address any identified risks in a timely manner.	Medium	All	✔	✔
9.13	Physical security perimeters shall be in place to restrict access to authorised personnel to areas that contain	Low	All	✔	✔

Ref		Risk Indicator	Products	SP	O
	information and information processing facilities and to reduce the risk of environmental threats and hazards to equipment.				
9.14	Equipment shall be protected from power failures and other disruptions caused by failures in supporting utilities.	Low	All	✔	✔
9.15	All relevant information security requirements shall be established and formally agreed with each third party and business partner, that may access, process, store and communicate data, or provide IT infrastructure components for the organisation's information.	Low	All	✔	✔
9.16	Virus and malware scanners and detection programs shall be installed on all pertinent information systems and these shall be updated regularly.	Medium	All	✔	✔
9.17	Networks shall be managed and controlled to protect information in systems and applications. Firewalls shall be implemented at network perimeters to protect against unauthorised access of information.	Medium	All	✔	✔
9.18	Controls shall be in place to manage changes to information processing facilities and systems in order to reduce security risk and system failures.	Medium	All	✔	✔
9.19	All players shall be authenticated with an account identifier/password pair, or by any other means that provide equal or greater security, prior to being permitted to access the system.	High	All	✔	✔
9.20	All users of the operator's system shall be authenticated with an account identifier/password pair, or by any other means that provide equal or greater security, prior to being permitted to access the system. All user authentication attempts shall be logged, and unattended equipment shall have appropriate session time-outs.	Medium	All	✔	✔
9.21	Passwords and account settings shall be appropriately configured, in line with the organisational security policy, to mitigate the risk of security breaches.	Medium	All	✔	✔
9.22	Remote access to operational networks shall be routed through secure gateways and protected through appropriate encryption techniques.	Medium	All	✔	✔
9.23	A policy and supporting security measures shall be adopted to manage the risks of using mobile devices.	Medium	All	✔	✔
9.24	Security administration activities shall ensure that access to networks, network services, applications, data, and operating systems is appropriately restricted to authorised individuals whose access rights are commensurate with their job responsibilities and with management's control objectives.	Medium	All	✔	✔

Ref		Risk Indicator	Products	SP	O
9.25	All player deposit, withdrawal or adjustment transactions shall be subject to strict security control and shall be maintained in a system audit log.	High	All	✔	✔
9.26	All inactive accounts, which hold player funds, shall be restricted against unauthorised user access.	Low	All	✔	✔
9.27	Data transmitted in online transactions shall be secured to prevent incomplete transmission, misrouting, unauthorised message alteration, unauthorised disclosure, unauthorised message duplication or replay.	Medium	All	✔	✔
9.28	A policy on the use, protection, and lifetime of cryptographic controls for the protection of data and information shall be developed and implemented.	Low	All	✔	✔
9.29	Event logs recording user activities, exceptions, faults, and information system security events shall be retained and protected. Logging facilities and log information shall be protected against tampering and unauthorised access.	Medium	All	✔	✔
9.30	The clocks of all relevant information processing systems within an organisation or security domain shall be synchronised to a single reference time source.	Low	All	✔	✔
Business Continuity and Disaster Recovery					
9.31	The organisation shall document and implement a business continuity plan that covers all critical locations and clearly defines responsibilities and procedures between software providers and operators.	Medium	All	✔	✔
9.32	Training and awareness of the business continuity plan shall be provided to key employees involved in the business continuity and disaster recovery processes.	Medium	All	✔	✔
9.33	Business continuity exercises shall be planned, performed, and evaluated at regular intervals to prepare the organisation for crisis situations.	Medium	All	✔	✔
Information Backups					
9.34	Backup and recovery procedures shall be in place to ensure data and information (e.g. logs and financial information) are backed up to a secure off-site location on a regular basis and can be restored in the event of a disaster.	Medium	All	✔	✔
9.35	Critical data and information shall be backed-up on a real time and periodic basis and secured off-site in a timely manner.	High	All	✔	✔
9.36	Backup and disaster recovery responsibilities and procedures between software providers and operators shall be clearly defined.	Low	All	✔	✔
Server Connectivity and System Malfunctions					

Ref		Risk Indicator	Products	SP	O
9.37	Players shall be informed in the game rules on how to complete any incomplete game and the result of incomplete games shall be available to players.	Low	All	✔	✔
9.38	The system shall enable players to complete interrupted games, within a reasonable timeframe, whether from loss of communication with the end-player device or an event on the system.	Medium	All	✔	✔
9.39	All transactions involving player funds shall be recoverable by the system in the event of a failure or malfunction.	Medium	All	✔	✔
Software Development and Maintenance					
9.40	A development methodology for the development and maintenance of secure systems, software and applications shall be defined, documented, and implemented.	Medium	All	✔	
9.41	All documentation relating to system, software and application development shall be available and retained for the duration of its lifecycle.	Medium	All	✔	
9.42	Reports shall be generated for all changes made to game parameters.	Medium	All	✔	✔
9.43	Data input, validation and output controls shall be incorporated into key applications to ensure that data is complete, valid, and accurate. Appropriate mechanisms shall be in place to detect any corruption of information through processing errors or deliberate acts.	Low	All	✔	✔
9.44	Change control procedures shall be implemented in line with the organisational change management policy and shall cater for the following:	Medium	All	✔	
9.44.1	Approval procedures for changes to software.	Medium	All	✔	✔
9.44.2	A policy addressing emergency change procedures.	Medium	All	✔	✔
9.44.3	Procedures for testing and migration of changes.	Medium	All	✔	✔
9.44.4	Segregation of duties between the developers, quality assurance, deployment, and end-users.	Medium	All	✔	✔
9.44.5	Procedures to ensure that technical and user documentation are updated as a result of a change.	Low	All	✔	
9.44.6	Procedures to ensure that security control requirements are specified for new systems or enhancements to existing systems.	Medium	All	✔	
9.44.7	Procedures to ensure that sensitive player data used for testing purposes is protected against unauthorised disclosure.	Medium	All	✔	
9.45	The development and test environments shall be separated physically and logically from the live operational systems.	Medium	All	✔	✔

10   LIVE DEALER STUDIO SPECIFIC REQUIREMENTS

OBJECTIVE:

Games shall be fair and operated in a safe and secure environment.

METHODOLOGY:

eCOGRA shall ensure that seal holders meet these requirements by reviewing the seal holders' premises, client websites and acceptable financial and control practices used to meet this objective.

MINIMUM REQUIREMENTS:

Ref		Risk Indicator	Products	SP	O
	Live Dealer Studio Specific Requirements				
10.01	Dealers, croupiers, and pit bosses shall all complete extensive training programs. Controls shall be in place for the appointment and dismissal of staff.	Low	C	✔	
10.02	Scanners and card readers shall be present to ensure that results are correctly entered.	Low	C	✔	
10.03	All live dealer and croupier activities shall be supervised by pit bosses and made visually available to the players.	Medium	C	✔	
10.04	All video feeds and associated studio-player communication shall be recorded. Game videos and communication logs shall be immediately retrievable from the archives.	Low	C	✔	
10.05	Game videos and communication logs shall be retained in archives for a minimum period of 90 days.	Low	C	✔	
10.06	All cards and game results shall be clearly visible, together with a separate icon depicting a matching outcome on the player's screen.	Low	C	✔	
10.07	Internal statistical results reviews shall be regularly conducted to monitor game performance and pay-out percentages, and to detect irregularities and variances.	High	C	✔	
10.08	Final game results shall be collated into statistics which can be analysed for trends relating to games, staff and/or locations in the gambling area (e.g. blackjack table number 2).	Medium	C	✔	
10.09	Policies and procedures for conducting results reviews and investigation procedures to be undertaken, in the event that material variances are identified, shall be documented.	Low	C	✔	
10.10	Studio rules and controls shall be implemented and documented, including:				
10.10.1	Studio access.	Low	C	✔	
10.10.2	Collusion, cheating and other dealer and croupier specific controls, including vocalising and the use of hand signals.	Medium	C	✔	
10.10.3	Dealer and croupier shifts, rotations, and break procedures.	Low	C	✔	

Ref		Risk Indicator	Products	SP	O
10.10.4	Segregation of responsibilities in preparing for games prior to play, during play and after play.	Low	C	✔	
10.10.5	Shuffling, presentation, card pickup and responding to dropped cards.	Low	C	✔	
10.10.6	Requesting deck replacements.	Low	C	✔	
10.10.7	Assistance to players.	Low	C	✔	
10.10.8	Resolution procedures for irregularities and errors.	Medium	C	✔	
10.10.9	Equipment cleaning, maintenance, and testing.	Low	C	✔	
10.10.10	Tamper-proof card shoes and similar devices.	Low	C	✔	
10.10.11	Destruction of worn out equipment.	Low	C	✔	
10.10.12	Secure inventory storage when not in use.	Low	C	✔	
10.10.13	Inventory tracking and audits of stored and live decks.	Low	C	✔	
10.10.14	Record retention.	Low	C	✔	