



## CONTROL SYSTEM SUBMISSION

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This is Schedule "I" to the Regulations Concerning Interactive Gaming

**All information provided by the applicant to the Commission will be held in the strictest confidence and will not be used by the Commission for any purpose other than matters pertaining to this application nor will the information be provided, in whole or in part, to any other party without the applicant's express written permission.**

## Overview

### Version

This Schedule is subject to change without notice. It is the responsibility of the Applicant to ensure the current version is in use.

This document provides a template to enable Applicants to make a structured submission to the Kahnawake Gaming Commission (the "Commission"). The format of that submission is intended to enable thorough understanding and timely consideration by the Commission.

### Format of submission

The Applicant will respond to all items cited in the attached **questionnaire** by placing an "X" in the appropriate column.

A "Yes" answer indicates that the control is in place at the time the Control System Submission is completed, **or will be in place prior to the date on which the applicant commences offering interactive gaming to the public under a Client Provider Authorization ("CPA")**.

Where a "No" answer is indicated, the Applicant may provide further detail such as mitigating controls or projected implementation dates under the appropriate column or, if additional space is required, in the space provided at the end of the Control System Submission.

As a matter of practice, the Commission will audit an applicant's operations as part of the Commission's Continuous Compliance Program within twelve (12) months of the date on which an applicant commences offering interactive gaming to the public under a CPA. The audit may be conducted on-site or remotely, at the Commission's discretion.

The Commission may consider false or misleading responses are a reflection of the character of the Applicant and consider this in determining if the respondent is suitable to operate, or continue to operate an interactive gaming system within or from the Mohawk Territory of Kahnawake.

### Questions

Any questions about this Control System Submission should be directed to the Compliance Officer that has been assigned to your file.

**Applicant information**

Proposed start or "go live" date: \_\_\_\_\_

Name of Applicant company as it will appear on the Client Provider Authorization ("CPA"):

\_\_\_\_\_

Name of person making the application on behalf of the Applicant:

\_\_\_\_\_

Date of application: \_\_\_\_\_

Mailing address of Applicant:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Contact information**

Name of primary contact person: \_\_\_\_\_

Time zone in which contact person is located: \_\_\_\_\_

Business telephone number: \_\_\_\_\_

Alternate business telephone number: \_\_\_\_\_

Mobile number: \_\_\_\_\_

Fax number: \_\_\_\_\_

Email address: \_\_\_\_\_

Alternate email address: \_\_\_\_\_

**Types of games to be offered**

Type(s) of game(s) to be offered (check as many as are appropriate)

**Casino games** (list types of games – eg. Blackjack, slots, roulette)

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Gaming software to be used for casino games: \_\_\_\_\_

Date on which RNG was last tested: \_\_\_\_\_ (attach certification)

**Sportsbook** (describe operation)

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Odds maker/bookmaker and any other partner to be used for sportsbook operation: \_\_\_\_\_

Software to be used for accounting systems: \_\_\_\_\_

**Poker** (describe operation)

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Software/network to be used for poker games: \_\_\_\_\_

Date on which RNG was last tested: \_\_\_\_\_ (attach certification)

**Bingo** (describe operation)

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Software/network to be used for bingo games: \_\_\_\_\_

Date on which RNG was last tested: \_\_\_\_\_ (attach certification)

Other type(s) of games (describe)

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Date on which RNG was last tested: \_\_\_\_\_ (attach certification)



**Jurisdictions from which players are accepted, and not accepted**

List the countries, territories and/or geographic regions from which the applicant Company will accept players—in order of priority.

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List the countries, territories and/or geographic regions from which the applicant Company will NOT accept players.

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**Equipment at Mohawk Internet Technologies and Continent 8 Technologies**

Describe the servers and related equipment that will be located at Mohawk Internet Technologies (“MIT”) (or, if applicable, other facility managed by Continent 8 Technologies (“C8”)) and the functions the servers will perform.

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**Other Jurisdictions**

If applicable, describe the nature of all aspects of your operations that are located, or that will be located, in jurisdictions other than Kahnawake. Include a copy of any gaming licenses issued by the other jurisdictions.

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## ANTI-MONEY LAUNDERING AND COUNTER FINANCING OF TERRORISM

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
190	1. Has the Applicant developed and implemented Anti-Money Laundering ("AML") and Counter Financing of Terrorism ("CFT") policies which will provide reasonable security measures to prevent transactions which are potentially connected to money laundering and the financing of terrorism?	Internal Controls			
190	2. Are the AML/CFT policies formally documented and approved and supported by senior management?	Policy Document			
190 (audit detail)	3. Do the AML/CFT policies provide for the monitoring, identification and escalation of transactions potentially associated with money laundering?	Policy Document			
190	4. Has the Applicant implemented internal controls, processes and procedures to support the AML/CFT policy?	Internal Controls			
191	5. Has the Applicant appointed a qualified person to act as an AML/CFT Compliance Officer for ensuring the effective operation of the AML/CFT policy and internal controls?	Human Resources			
192	6. Are AML/CFT control requirements between Applicant and relevant service providers clearly defined?	Internal Controls			
193	7. Do the Applicant's terms and conditions state the requirements applicable to funds transferred between players?	Internal Controls			
194	8. Is positive identity verification requested from players upon either a deposit or withdrawal that exceeds \$10,000.00 (whether in a single transaction or series of linked transactions)?	Internal Controls			

**ANTI-MONEY LAUNDERING AND COUNTER FINANCING OF TERRORISM**

<b>Reg</b>	<b>Question</b>	<b>Control Area</b>	<b>Yes</b>	<b>No</b>	<b>If "No", provide an explanation.</b>
194 (audit detail)	9. Has reporting functionality been developed within the back-office application or through data extracts from the database to produce reports on:  (a) All transactions (single or cumulative) per individual exceeding \$10,000.00 within a twenty-four (24) hour period; and  (b) All suspicious transactions (single or cumulative) exceeding \$5,000.00 by a connected group of people?	System Functionality			
194 (audit detail)	10. Is a legal disclaimer displayed on all of the Applicant's websites stating that any criminal or suspicious activities may be reported?	Website			
195	11. Are the Applicant's employees made aware of their personal obligations to detect and report criminal and suspicious behaviour to senior management as well as the dangers of 'tipping-off' and the procedures to be followed to ensure it does not happen?	Human Resources			
196	12. Does the Applicant have systems in place to ensure that records of player's financial transactions and player verification documents are retained for a minimum period of five (5) years?	Internal Controls			
197	13. Does the Applicant have systems in place to ensure that funds will be remitted by the Applicant to a player only through the same payment mechanism from which the funds originated, unless it has been established that the new payment mechanism is in the name of the same player?	Internal Controls			
198	14. Has the Applicant developed and implemented measures to ensure that no cash-ins will be made to a player's account where there is reason to suspect money laundering or terrorist activity?	Internal Controls			

## ANTI-MONEY LAUNDERING AND COUNTER FINANCING OF TERRORISM

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
198	15. Has the Applicant developed and implemented measures to ensure that all information regarding changes to player details will be logged and appropriate verification documentation will be requested for significant changes, including but not limited to players' names and banking details?	Internal Controls			
198	16. Has the Applicant developed and implemented measures to ensure that transfers of funds between player accounts will only be conducted through a formal documented process?	Internal Controls			
198	17. Has the Applicant developed and implemented measures to ensure that the recommendations of the Financial Action Task Force ("FATF"), particularly as they pertain to casinos and gaming establishments, are fully respected?	Internal Controls			
198 (audit Detail)	18. Does the formal anti-money laundering policy document provide for the FATF requirements including:  (a) "Tipping off";  (b) The retention of verification documents;  (c) The identification, escalation and reporting of suspicious transactions; and  (d) Anti-money laundering responsibilities between the Applicant and third party service providers?	Policy Document			
200	19. Has the Applicant developed and implemented measures to ensure that no one under the age of eighteen (18) years can participate as an employee or agent in operations related to the conduct of authorized games?	Human Resources			

## PLAYER PROTECTION

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
201	20. Has the Applicant taken all reasonable and available measures to ensure that anyone under the full age of eighteen (18) years does not participate as a player in an authorized game?	Control Systems			
201 (audit detail)	21. Is a formal documented policy regarding underage play implemented?	Policy Document			
201 (audit detail)	22. Do the homepages of all the Applicant's websites display a "no under 18's" sign, which hyperlinks through to a clear message regarding underage play?	Website			
201 (audit detail)	23. Does the player registration process include:  (a) A clear message regarding underage play; and  (b) A requirement for registrants to capture their date of birth?	Website			
201 (audit detail)	24. Do the terms and conditions on all of the Applicant's websites contain a clause prohibiting underage play?	Website			
201 (audit detail)	25. Do the responsible gaming pages on all of the Applicant's websites contain an active link to a recognised filtering programme?	Website			
201 (audit detail)	26. Are internal controls in place for the identification and prevention of underage play?	Internal Controls			

<b>PLAYER PROTECTION</b>					
<b>Reg</b>	<b>Question</b>	<b>Control Area</b>	<b>Yes</b>	<b>No</b>	<b>If "No", provide an explanation.</b>
201 (audit detail)	27. Are automated controls implemented within the registration process, for all of the Applicant's websites, to prevent underage players from successfully registering a player account?	System Functionality			
201 (audit detail)	28. Does the back-office application have functionality to flag player accounts that have been locked due to underage play?	System Functionality			
201 (audit detail)	29. Are automated or manual controls in place to identify and lock multiple or linked accounts of identified underage players?	System Functionality			
201 (audit detail)	30. Does the Applicant have a formal documented process for age and player verification, including the instances where verification of players is required?	System Functionality			
203	31. Has the Applicant taken all reasonable and available measures to ensure that any money paid in respect of the use of its services by a player under the full age of eighteen (18) years is returned to the player as soon as is reasonably practicable?	Control Systems			
203 (audit detail)	32. Does the Applicant have a formal documented process for the treatment of deposits and winnings of players that are subsequently identified as underage?	Policy Document			
203 (audit detail)	33. Does the formal documented process state that all (non-disputed) deposits received from underage players will be refunded to the player or funding source?	Policy Document			

<b>PLAYER PROTECTION</b>					
<b>Reg</b>	<b>Question</b>	<b>Control Area</b>	<b>Yes</b>	<b>No</b>	<b>If "No", provide an explanation.</b>
204	34. Do the terms and conditions on all of the Applicant's websites indicate that players identified as underage will forfeit their accrued winnings to the Commission?	Website			
205	35. Has the Applicant taken all reasonable and available measures to ensure that a person cannot participate in an authorized game under a name, account name or designation that is obscene, indecent or offensive?	Control Systems			
206	36. Has the Applicant taken all reasonable and available measures to ensure that the Applicant may refuse to register a person as a player in an authorized game under a name or account name that is obscene, indecent or offensive?	Control Systems			
207	37. Does the Applicant's player registration process ensure that the following details are required to be captured by players prior to successful registration: (a) full names; (b) residential address; (c) age or date of birth; (d) contact details; (e) a password to access the registered account; and (f) positive confirmation of acceptance of a legally enforceable contract defining the terms and conditions of play?	System Functionality			
207 (audit detail)	38. Does the website or gaming software provide players with integrated functionality to perform the following activities online: (a) To create a unique username and password to access the player account; (b) To change the player account password; (c) To view the player account balance and the financial transactions that have resulted in movements to the player's account balance; (d) To access the funds in the player's account for purposes of participating and wagering in a game offered by the Applicant; (e) To withdraw all or part of the account balance (in accordance with the terms and conditions on the Applicant's website); and (f) To close the player account?	System Functionality			

**PLAYER PROTECTION**

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
208	39. Are the Applicant's account opening documents free of terms that are unfair or unreasonable to the player?	Control Systems			
209	40. Has the Applicant developed and implemented measures to ensure that a player is limited to one player account for any website operated by the Applicant?	Internal Controls			
209 (audit detail)	41. Do the terms and conditions on all of the Applicant's websites indicate that players are permitted to register no more than one account?	Website			
209 (audit detail)	42. Are automated controls in place for the identification of players that attempt to register multiple accounts?	System Functionality			
209 (audit detail)	43. Are automated controls in place for the identification of players that have successfully registered multiple accounts?	System Functionality			
209 (audit detail)	44. Is the back-office application able to generate exception reports on player accounts that contain duplicate or similar player information?	System Functionality			
209 (audit detail)	45. Where multiple accounts that have been successfully registered by a single player are identified by the Applicant, are these player accounts locked in a timely manner?	Internal Controls			



## PLAYER PROTECTION

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
210	46. Has the Applicant developed and implemented measures to ensure that a player's account is established in a manner that allows a player only to: (a) have direct access to funds in that account; (b) use some or all of the funds in that account to play an authorized game offered by the Applicant; (c) obtain the balance of funds in that account and close the account; (d) obtain the whole or part of the amount paid into that account as a prize in an authorized game or as authorized by the Applicant or the Commission?	System Functionality			
211	47. Has the Applicant developed and implemented measures to ensure that the Applicant cannot accept a bet or wager from a player in an authorized game unless a player's account has been established in the name of the player and there are adequate funds in the account to cover the amount of the bet or wager?	System Functionality			
212	48. Does the Applicant's website display hyperlinks to the terms and conditions of use and to the full and complete rules of the authorized games being offered?	Website			
212 (audit detail)	49. Are internal controls in place to ensure that changes to the terms and conditions on all of the Applicant's websites are appropriately approved prior to deployment?	Internal Controls			
212 (audit detail)	50. Do the terms and conditions on all of the Applicant's websites include the date and time of the latest revision?	Website			
213	51. Are the Applicant's rules posted in the English language and any other language the Applicant deems appropriate?	Website			

## PLAYER PROTECTION

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
215	52. Do all of the Applicant's games and betting events follow a constant set of rules and at no time deviate from those rules?	Internal Controls			
215 (audit detail)	53. Does the Applicant have access to directly affect changes to the game rules?	System Functionality			
215 (audit detail)	54. Are game rules made available to players within the gaming software or on the websites of the Applicant?	System Functionality			
215 (audit detail)	55. If a sports book product is offered by the Applicant, are sports betting rules made available to players within the gaming software or on the Applicant's websites?	System Functionality			
215 (audit detail)	56. Where game rules are provided on the Applicant's website(s), do management control and authorise all changes to game rules that are deployed to the website?	Internal Controls			
216	57. Does the Applicant, at the request of a player in whose name a player's account is established, once the player's identity has been verified, remit funds in the player's account to the requesting player as soon as practicable after receipt of the request?	System Functionality			
216 (audit detail)	58. Does the Applicant have a formal documented policy on the processing of player deposits and player withdrawals?	Policy Document			

<b>PLAYER PROTECTION</b>					
<b>Reg</b>	<b>Question</b>	<b>Control Area</b>	<b>Yes</b>	<b>No</b>	<b>If "No", provide an explanation.</b>
216 (audit detail)	59. Does the formal documented policy require that uncontested player withdrawals must be processed within five (5) working days?	Policy Document			
217	60. Does the Applicant ensure that:  (a) the Applicant's liability for player balances is separately identifiable at all times; and  (b) player balances and prizes, bonuses and guaranteed amounts are covered by liquid funds at all times and that upon request the Commission is provided proof of same?	System Functionality			
217 (audit detail)	61. Are players' funds held in separate and dedicated bank accounts that are isolated from the Applicant's operating funds?	Internal Controls			
217 (audit detail)	62. Are all player funds held in accounts with accredited financial institutions?	Internal Controls			
217 (audit detail)	63. Are player balances disclosed as a separate liability on the Applicant's financial accounts?	Internal Controls			
218	64. Has the Applicant developed and implemented measures to ensure that any manual adjustments made to a player's account must be reviewed and authorized by the appropriately authorized management personnel?	System Functionality			

## PLAYER PROTECTION

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
218 (audit detail)	65. Does the back-office application maintain an audit log of all manual and bulk adjustments to player balances?	System Functionality			
218 (audit detail)	66. Does the back-office application functionality include a management report on all negative adjustments to player balances?	System Functionality			
218 (audit detail)	67. Does the Applicant maintain a formal process to review and approve negative manual and bulk adjustments on player accounts (including adjustments relating to the purging of player funds)?	Internal Controls			
218 (audit detail)	68. Are manual adjustment reports prepared and authorized on a regular basis and are these retained?	Internal Controls			
219	69. For an Applicant that offers sportsbook wagering, does the Applicant have in place effective risk control mechanisms for managing events offered, bet sizes and prices, taking into consideration available liquid funds?	System Functionality			
220	70. Does the Applicant refrain from accepting cash from players and ensure that funds are received from players only by any of the following methods: (a) credit cards; (b) debit cards or stored value accounts; (c) electronic transfer; (d) wire transfer; (e) cheques; (f) any other method approved by the Commission?	Internal Controls			

**PLAYER PROTECTION**

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
221	71. Has the Applicant developed and implemented measures to ensure that, unless authorized by the Commission, the Applicant will not provide credit to a player or a player's account or act as agent for a credit provider to facilitate the provision of credit to a player or a player's account?	Internal Controls			
222	72. Has the Applicant developed and implemented measures to ensure that , the Applicant does not have access to funds in a player's account except as follows: (a) to debit to the account, a wager made by the player or an amount the player indicates the player wants to wager in the course of an authorized game the player is playing or is about to play; (b) to remit funds standing to the credit of the account to the player at the player's request; (c) as otherwise authorized under the Commission's Regulations concerning Interactive Gaming?	System Functionality			
223	73. Does the Applicant have a written policy (the "dormant player account policy") which describes the process that will be used to clear dormant player accounts and the process that will be followed when a player requests a withdrawal from a dormant account that has been cleared?	Policy Document			
224	74. Is the Applicant's "dormant player account policy" included in terms and conditions that are posted on the Applicant's website?	Website			
225	75. Does the Applicant maintain a complete and accurate record for all dormant player accounts that have been cleared?	Internal Controls			

PLAYER PROTECTION					
Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
225	76. Has the Applicant developed and implemented measures to ensure that any request from a player for a withdrawal from a dormant account that has been cleared will be addressed and resolved in accordance with the provisions of the dormant player account policy?	Internal Controls			
227	77. Has the Applicant developed and implemented measures to ensure that the disclosure of information, or its use for a purpose other than the purpose for which it was given, is only authorized if the disclosure or use is:  (a) authorized by the player;  (b) reasonably necessary for the conduct of authorized games; or  (c) required for the administration or enforcement of the Kahnawake Gaming Law or the Commission's Regulations concerning Interactive Gaming?	Internal Controls			
227 (audit detail)	78. Do all employment contracts and relevant third party service provider contracts include an appropriate confidentiality clause, preventing the signatories from disclosing player information?	Human Resources			
226	79. Has the Applicant developed and implemented measures to ensure that the Applicant or an employee or other person engaged in duties related to the conduct of an authorized game does not, without authorization under section 227 of the Regulations:  (a) disclose information about the name, or other identifying particulars, of a player; or  (b) use information about a player for a purpose other than the purpose for which the information was given?	Internal Controls			

## PLAYER PROTECTION

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
226 (audit detail)	80. Do the back-office application/s and relevant databases have the capability to securely store credit card details and other sensitive player information?	System Functionality			
226 (audit detail)	81. Is access to view credit card details and other sensitive player information restricted to authorized users only (at an application and database level)?	System Functionality			
226 (audit detail)	82. Is sensitive player information stored in an encrypted format at database level?	System Functionality			
226 (audit detail)	83. Is administrator access to view credit card details and other sensitive player information in the back-office application controlled?	System Functionality			
226 (audit detail)	84. Does the system maintain an audit log of restricted and sensitive player information that has been viewed by system users?	System Functionality			
226 (audit detail)	85. Has the Applicant implemented a privacy policy that permits the disclosure of player information only where:  (a) Reasonably necessary for the conduct of authorized games; or  (b) Required for the administration or enforcement of law or regulations.	Policy Document			
226 (audit detail)	86. Is the Applicant's privacy policy made available to players on the all of the Applicant's websites?	Website			

## PLAYER PROTECTION

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
228	<p>87. Has the Applicant taken all reasonable steps to ensure that the Applicant's approved control system enables a player whose participation in an authorized game is, after he or she has made a bet or wager, interrupted by:</p> <p>(a) a failure of the Applicant's system;</p> <p>(b) a failure of the player's computer; or</p> <p>(c) for any other reason that prevents the player from continuing the authorized game,</p> <p>to resume, on the restoration of the system or computer, his or her participation in the authorized game, that was interrupted, as at the time immediately before the interruption without loss or penalty?</p>	System Functionality			
228 (audit detail)	88. Does the system retain the results of the gaming activity that have not been transmitted to players due to connectivity interruptions?	System Functionality			
228 (audit detail)	89. Does the system allow players to view non-retrieved gaming and financial information resulting from system interruptions?	System Functionality			
228 (audit detail)	90. Are players provided, upon request, with non-retrieved gaming and financial information resulting from system interruptions?	System Functionality			
228 (audit detail)	<p>91. Do the website terms and conditions and/or gaming software communicate:</p> <p>(a) The procedures to be followed by players for information recovery and game continuity; and</p> <p>(b) The relevant terms and conditions applicable to game play that is affected by system interruptions or loss of connectivity?</p>	Website			



PLAYER PROTECTION					
Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
228 (audit detail)	92. Do the terms and conditions and game recovery procedures on all of the Applicant's websites or download gaming software appropriately address system interruptions relating to single player gaming activities (e.g. casino) and multiplayer gaming activities (e.g. poker)?	Website			
229	93. Has the Applicant developed and implemented policies and procedures to ensure that if the Applicant's system does not enable a player to continue, after the restoration of the system or computer, with an authorized casino game interrupted by a failure of the Applicant's system, the player's computer or for any other reason, without loss or penalty the Applicant will:  (a) ensure that the game is terminated;  (b) refund the amount of the wager to the player by placing it in the player's account;  (c) immediately inform the Commission of the incident;  (d) refrain from conducting further authorized games if such games are likely to be similarly affected?	Policy Document and System Functionality			
230	94. Is all information required for completing an incomplete game recoverable by the Applicant's system?	System Functionality			
231 (audit detail)	95. Has an approved agent performed a statistical analysis of the RNG and game outputs?	Internal Controls			
231 (audit detail)	96. Has an approved agent examined the RNG, scaling and mapping components to assess whether they operate in accordance with the rules of the virtual game or event? This review shall include a source code review of the RNG and scaling and mapping components for malicious/incorrect code where considered appropriate by the Commission?	Internal Controls			

**PLAYER PROTECTION**

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
231 (audit detail)	97. In respect of the poker games offered by the Applicant: <ul style="list-style-type: none"> <li>(a) Have preventative and detective controls been implemented to mitigate the risk of player collusion?</li> <li>(b) Are collusion detection controls automated?</li> <li>(c) Does collusion detection include monitoring of suspicious game play?</li> <li>(d) Have controls been implemented to prevent and detect players using poker bots?</li> </ul>	System Functionality			
231 (audit detail)	98. In respect of the sports betting games offered by the Applicant: <ul style="list-style-type: none"> <li>(a) Are internal controls or mechanisms in place to prevent individuals with material insider knowledge from participating in betting activities?</li> <li>(b) Does the Applicant monitor the betting activities of individuals known to have material influence on the outcome of results (e.g. players, referees, coaches)?</li> </ul>	System Functionality			

## COMPLAINTS AND DISPUTE RESOLUTION

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
231	99. Does the Applicant's dispute resolution process include an opportunity for the complainant to have recourse to the Commission?	Internal Controls			
231 (audit detail)	100. Has the Applicant developed and implemented a formal documented process over player complaints and disputes that provides for:  (a) Receiving and addressing player complaints;  (b) An appropriate dispute resolution process; and  (c) Escalating player complaints?	Policy Document			
231 (audit detail)	101. Does the Applicant communicate the mechanisms in place for players to lodge a complaint?	Website			
231 (audit detail)	102. Do all of the Applicant's websites communicate the complaint and dispute mediation alternatives offered to players?	Website			
231 (audit detail)	103. Are the Customer Support personnel appropriately trained on the process for handling player complaints and disputes?	Human Resources			
232	104. Does the Applicant maintain adequate records of all complaints and disputes it receives and ensure that such records are provided to the Commission in a timely fashion?	System Functionality			

## COMPLAINTS AND DISPUTE RESOLUTION

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
233	<p>105. Is the Commission's logo prominently displayed on the Applicant's website with a notification that complaints may be addressed directly to the Commission?</p> <p>Is the logo properly linked to a Certificate of Good Standing issued by the Commission?</p>	Website			
234	106. Does the Applicant advise persons who are not satisfied with the manner in which his or her complaint has been addressed by the Applicant, or who prefers to make his or her complaint directly to the Commission, may submit the complaint to the Commission?	Internal Controls			
234 (audit detail)	107. Does the system retain player complaint and dispute records and the associated correspondence in a manner that will allow for a detailed response, to enquiries by the Commission, in a timely manner?	System Functionality			
234 (audit detail)	108. Are all player complaints and disputes recorded and retained in a centralised storage facility?	System Functionality			

**PRIZES**

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
247	109. Has the Applicant developed and implemented measures to ensure that when a player in an authorized game wins a non-monetary prize the Applicant can: <ul style="list-style-type: none"> <li>(a) have the prize delivered personally or by certified mail to the player; or</li> <li>(b) give the player written notice of an address in the Territory at which the prize may be collected?</li> </ul>	Internal Controls			
247 (audit detail)	110. Are player's account balances updated automatically and immediately subsequent to a player winning a monetary prize from gaming activity?	System Functionality			
247 (audit detail)	111. Where prizes are withheld by the Applicant, are players provided with written notice and the reasons thereof?	Internal Controls			

## PLAYER LIMITATION AND EXCLUSION

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
257	112.Has the Applicant developed and implemented measures to ensure that a registered player may, by submitting a written notice to the Applicant, set a deposit limit per day, week or month (a "Self-Limitation Request")?	Internal Controls			
259	113.Has the Applicant developed and implemented measures to ensure that a player may, by written notice to the Applicant, increase or revoke a deposit limit after a minimum waiting period of twenty-four (24) hours from the time of the request, except when the deposit limit was set to zero (0)?	Internal Controls			
259 (audit detail)	114.Do all of the Applicant's websites clearly communicate the facility of limiting deposit and gaming activity to players?	Website			
259 (audit detail)	115.Does the system automatically prevent the players from exceeding pre-set deposit or gaming limits?	System Functionality			
260	116.Has the Applicant developed and implemented measures to ensure that a registered player that has set a deposit limit to zero (0) may, by providing written notice to the Applicant, change or revoke the deposit limit, but only after a minimum waiting period of six (6) months from the time of the request?	Internal Controls			
260 (audit detail)	117.Is the processing of player requests for zero deposit or gaming limits processed automatically and made effective immediately?	System Functionality			
261	118.Has the Applicant developed and implemented measures to ensure that it does not accept a deposit from a registered player contrary to a limit set out in a Self-Limitation Request?	Internal Controls			

## PLAYER LIMITATION AND EXCLUSION

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
263	<p>119.Has the Applicant developed and implemented measures to ensure that when a registered player has requested that his or her deposit limit be set to zero (0), or has made a Direct Self-Exclusion Request, the Applicant immediately, or as soon as is practicable:</p> <p>(a) locks the registered player's account and pays out any funds in the account, subject to appropriate and necessary checks and verifications;</p> <p>(b) makes all reasonable efforts to prevent marketing materials from being sent to the registered player;</p> <p>(c) provides the registered player with contact information for an organization trained to assist problem gamblers, and encourage the registered player to contact this organization?.</p>	Internal Controls			
267	<p>120.Has the Applicant developed and implemented measures to ensure that upon receipt of a Self-Exclusion Directive from the Commission, it will complete such steps as are necessary to permanently exclude the requesting player from accessing, depositing funds and from playing on any gaming system that is operated by the Applicant and will:</p> <p>(a) lock the registered player's account and pay out any funds in the account, subject to appropriate and necessary checks and verifications;</p> <p>(b) make all reasonable efforts to prevent marketing materials from being sent to the registered player; and</p> <p>(c) provide the registered player with contact information for an organization trained to assist problem gamblers, and encourage the registered player to contact this organization?</p>	Internal Controls			
270	<p>121.Has the Applicant been advised by the Commission of all Comprehensive Self-Exclusion Directives in existence?</p>	Control Systems			

**PLAYER LIMITATION AND EXCLUSION**

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
270	122.Has the Applicant entered all existing Comprehensive Self-Exclusion Directives into its control systems?	Control Systems			
273	<p>123.Has the Applicant developed and implemented measures to ensure that in the event the Applicant finds that a player has deposited funds in contravention of the terms of a Self-Limitation Request, a Direct Self-Exclusion Request, a Comprehensive Self-Exclusion Request or an Order of Prohibition (the "unauthorized deposit"):</p> <p>(a) the Applicant will notify the Commission and the player within twenty-four (24) hours of finding the unauthorized deposit, and provide all relevant information pertaining thereto;</p> <p>(b) the Applicant will hold the unauthorized deposit in trust and not release the amount of the unauthorized deposit to the player until six (6) months after the date on which the unauthorized deposit was found;</p> <p>(c) the Applicant will ensure that any winnings the player has accumulated as a result of the unauthorized deposit will be forfeited to a third party charity selected by the Commission?</p>	System Functionality			
275	124.Are player self-limitation and self-exclusion procedures and conditions clearly communicated on the Applicant's responsible gaming page?	Website			
276	125.Has the Applicant provides training to customer service employees on the issues of problem gaming and to ensure the prompt and efficient handling of correspondence relating to player self-limitation and self-exclusion? Does the Applicant make provision for refresher courses to be undertaken as and when needed?	Human Resources			



## PLAYER LIMITATION AND EXCLUSION

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
285	<p>126.Has the Applicant developed and implemented measures to ensure that when served with a copy of an Order of Prohibition the Applicant will, as of a date and time set out in the Order, complete such steps as are necessary to permanently exclude the Player of Concern from accessing, depositing funds and from playing on any gaming system that is operated by the Applicant and regulated by the Commission and must:</p> <p>(a) lock the registered player's account and pay out any funds in the account, subject to appropriate and necessary checks and verifications;</p> <p>(b) make all reasonable efforts to prevent marketing materials from being sent to the registered player; and</p> <p>(c) provide the registered player with contact information for an organization trained to assist problem gamblers, and encourage the registered player to contact this organization?</p>	System Functionality			
292	<p>127.Does the Applicant display at all times, in a prominent place, on the home page of its website, a warning of the risks associated with gaming and information and links to other websites assisting compulsive gamblers?</p>	Website			
292 (audit detail)	<p>128.Does the homepage of the Applicant's website contain a clear link to a player protection and responsible gaming page that includes:</p> <p>(a) A warning that gaming could be harmful if not controlled and kept in moderation;</p> <p>(b) Advice on responsible gaming and a link to sources of help on problem gambling, including helpline numbers;</p> <p>(c) A simple self-assessment process to determine risk potential;</p> <p>(d) A list of player protection measures (deposit or gaming limits including zero limits for self-exclusion and temporary cooling off) that are available on the site, and access to these measures; and</p> <p>(e) Details of the Applicant's responsible gaming policy?</p>	Website			

## RECORDS AND REPORTS

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
294	129.Has the Applicant nominated a place for keeping the Applicant's gaming records? Has the place been approved by the Commission?	Other			
294 (audit detail)	130.Will the Applicant store the gaming records in a facility within the Kahnawake Territory?	Other			
297	131.Has the Applicant developed and implemented measures to ensure that the Applicant's gaming records will be kept for five (5) years after the end of the transaction to which the record relates?	System Functionality			
297 (audit detail)	132.Where the Applicant's systems do not have available storage to retain all player financial transactions for a minimum period of five (5) years, are these transactions accessible in archived or backed up storage facilities?	System Functionality			
299	133.Does the Applicant maintain an accounting system, for its operations in a manner that allows for the timely preparation and audit of financial statements and accounts?	System Functionality			
300	134.Does the Applicant keep accurate records of the following information:  (a) all receipts from players and payments to players; (b) a complete history of all transactions that affect player balances for a period of twelve (12) months?	System Functionality			
301	135.Does the Applicant implement back-up and recovery procedures to ensure data and information, including but not limited to logs and financial information, are backed up on a regular basis and can be restored in the event of a disaster?	System Functionality			

## RECORDS AND REPORTS

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
301 (audit detail)	136.Has the Applicant developed and implemented formally documented backup and recovery procedures?	Policy Document			
301 (audit detail)	137.Does the Applicant replicate or mirror live gaming data?	Internal Control			
302	138.Does the Applicant ensure that:  (a) critical data and information is backed up and secured off-site on a daily basis;  (b) back-up and disaster recovery responsibilities and procedures between software providers and the Applicant are clearly defined?	System Functionality			
302 (audit detail)	139.Does the Applicant perform major backup restores on a regular basis?	Internal Control			
303	140.Is the Applicant be able to demonstrate a financial reconciliation of the net movement of player deposits and withdrawals on its accounting systems to the relevant processor or bank transactions to ensure the accuracy and completeness of player account balances?	Internal Control			
303 (audit detail)	141.Are the receipts and payments from the back-office application reconciled to the payment processors on a regular basis?	Internal Control			

## RECORDS AND REPORTS

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
303 (audit detail)	142. Are the reconciliations of receipts and payments reviewed and approved by management?	Internal Control			
303 (audit detail)	143. Is the Applicant's accounting software integrated with the back-office application or other relevant gaming systems?	System Functionality			
303 (audit detail)	144. Is the generation of general ledgers, trial balances and financial statements automated by packaged accounting software or an internally developed financial application?	System Functionality			
303 (audit detail)	145. Is accounting software utilized to produce the following financial statements and accounting records:  (a) Trading accounts, if applicable, for each financial year;  (b) Profit and loss accounts (income statement) for each financial year; and  (c) Statement of financial position (balance sheets) as at the end of each financial year?	System Functionality			
303 (audit detail)	146. Does the Applicant have sufficiently qualified staff members that maintain the accounting records and prepare annual financial statements in a manner that can be conveniently and properly audited, if required by the Commission?	Human Resources			
304	147. Can the Applicant ensure that players are able to access their account history dating back for a minimum period of one (1) month, including all deposits, withdrawals and payments?	System Functionality			

**RECORDS AND REPORTS**

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
305	148.Has the Applicant developed and implemented policies to ensure that the Applicant's management is responsible for the content of annual financial statements and provides formal confirmation on an annual basis that financial statements for operations conducted by the Applicant are fairly presented in accordance with the relevant standardized/industry accepted accounting framework?	System Functionality			

## SYSTEM SECURITY MEASURES

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
311	149.Does the Applicant document, communicate and review annually, or more often in the event of a material change, security policies and procedures?	Policy Document			
312	150.Has the Applicant implemented security policies and procedures and are risk based internal and external security reviews conducted at least annually, or more often in the event of a material change?	Policy Document			
313	151.Has the Applicant installed and will the Applicant maintain and update on a regular basis, virus scanners and detection programs on all pertinent information systems?	Internal Control			
313 (audit detail)	152.Is anti-virus software installed on all relevant servers, desktops and laptops?	Internal Control			
313 (audit detail)	153.Do all machines that are not protected with anti-virus software have compensating controls or low virus risk?	Internal Control			
313 (audit detail)	154.Are processes in place to ensure that the anti-virus software is regularly updated with the latest virus definitions?	Internal Control			
313 (audit detail)	155.Are firewalls implemented and located appropriately in the network environment?	Internal Control			
313 (audit detail)	156.Does the Applicant make use of an intrusion detection system (IDS)/intrusion prevention system (IPS) to detect/prevent possible network threats?	Internal Control			

## SYSTEM SECURITY MEASURES

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
314	157.Has the Applicant implemented controls for changes to information processing facilities and systems to reduce the risk of security or systems failures?	Internal Control			
315	158.Has the Applicant developed and implemented policies to ensure that security of player accounts are maintained, and, in particular, does the Applicant:  (a) secure from unauthorized use, player credit card numbers stored on the Applicant' system; (b) require that all players have their identity verified with an account identifier and password combination, or by any other means that provides equal or greater security, prior to being permitted to access the system; (c) ensure that all deposit, withdrawal or adjustment transactions are subject to strict security controls and are maintained in a system audit log?	Policy Document			
316	159.Has the Applicant developed and implemented policies to ensure that all system users have their identities verified with an account verifier and password combination, or by any other means that provides equal or greater security, in accordance with a formalized internal policy, prior to being permitted to access the Applicant's system?	Policy Document			
317	160.Has the Applicant developed and implemented policies to ensure that security administration activities provide that access to applications, data and operating systems is appropriately restricted to authorized personnel who access rights are commensurate with their job responsibilities and with management's control objectives?	Policy Document			
318	161.Does the Applicant have in place preventative and detective controls or technology to ensure that the prospect of cheating through collusion between players is prevented?	Internal Control			

## SYSTEM SECURITY MEASURES

Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
319	162.Does the Applicant ensure that regular risk-based IT security reviews are conducted on data transmissions that carry sensitive player information and gaming data, where the Applicant's management considers the need to be appropriate?	System Functionality			



ADVERTISING					
Reg	Question	Control Area	Yes	No	If "No", provide an explanation.
323	163.Does the Applicant ensure that any advertisement or form of marketing it authorizes or that is conducted on its behalf:  (a) is not indecent or offensive;  (b) is based on fact; and  (c) is not false, deceptive or misleading in a material way?	Internal Control			
323 (audit detail)	164.Will management review and formally approve all marketing and advertising material prior to publication?	Internal Control			
323 (audit detail)	165.Does the Applicant have a verifiable advertising and marketing policy that clearly discourages:  (a) Advertising content and placement thereof that entices the underage to gamble or bet;  (b) False or misleading marketing and advertising content;  (c) Indecent or offensive marketing and advertising content;  (d) Marketing and advertising content that is not based on fact; and  (e) The distribution of unsolicited advertisement (i.e. SPAM) either directly or through third parties?	Internal Control			
323 (audit detail)	166.Does the Applicant include an 'unsubscribe' or 'opt out' function on all email marketing and advertisements?	System Functionality			

## ADDITIONAL INFORMATION

Section	Additional Information



Section	Additional Information