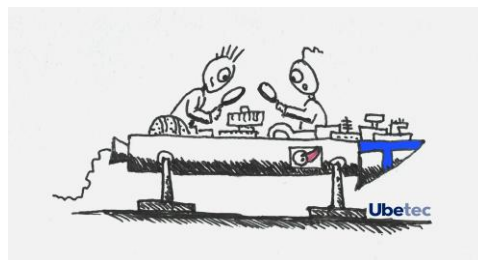


Ubetec - Internal Control System for Lottery and Betting Operations



One independent control platform for different gaming products. The Ubetec Internal Control System independently verifies gaming transactions and critical calculations across lottery and betting operations. The same core platform supports both, while product-specific control modules apply the relevant transaction data, results and game rules.

Our team has extensive experience in regulatory monitoring systems used by gambling authorities to verify gaming transactions, game outcomes, prize calculations and regulatory controls. Ubetec has also been selected to deliver an Internal Control System for Veikkaus lottery games.

Why the ICS is needed

After a lottery entry or bet has been accepted, most of its processing takes place inside the production gaming system. The player cannot see this process, while the operator must rely on the system performing each step correctly. Both depend on transactions being recorded correctly, official results and applicable game rules being applied consistently, and the correct prizes, winnings or cash-out amounts being paid. In pooled games, they must also rely on the distributable pool being formed and allocated correctly.

The ICS provides independent and traceable assurance that these processes have been performed correctly. It helps the operator detect and investigate discrepancies and provides evidence for internal control, compliance monitoring, audits, player complaints and regulatory review.

The ICS therefore supports both consumer protection and the operator's assurance needs by verifying that players are treated fairly, paid correctly and treated consistently under the applicable rules.

How the ICS complements certification

Gaming products and systems may already be certified by accredited testing laboratories. Certification and an ICS, however, serve different purposes.

The scope of certification depends on the applicable requirements and the testing conducted. Certification typically assesses a defined product, system or software version at a particular point in time. The ICS serves a different purpose by providing ongoing independent verification of actual transactions, calculations and payments in the production environment. It complements rather than replaces certification.

What the ICS does

The production gaming system accepts an entry or bet, records its terms, applies the result and game rules, calculates the outcome and records the related payment or player account transactions. The ICS provides a separate and independent control path.

- **Protects the data used for control.** The ICS verifies the integrity and continuity of the data supplied to it, allowing missing or altered records to be detected.
- **Verifies independently.** Product-specific modules perform their own checks and calculations based on verified data, applicable game rules and the terms accepted by the player.
- **Compares and documents.** The shared ICS platform compares the independently calculated results with the production system results, flags discrepancies for investigation and retains traceable evidence for internal control, audit, complaints and regulatory review.

The ICS does not replace the production gaming platform or the operator's trading, fraud and risk-management systems. It also does not perform draw supervision or RNG certification. Its role is to provide ongoing independent assurance that gaming transactions are processed correctly.

One platform with product specific controls

The lottery and betting control modules can be implemented separately or together, depending on the operator's products and control needs. Additional products and controls can be added to the same ICS platform over time.

Shared ICS platform	Lottery control module	Betting control module for fixed-odds and pool betting
• Data signing and integrity checks • Comparison with production system results • Exception handling and investigation • Audit trail and reporting	• Lottery entry and draw controls • Winning entry and prize calculations • Prize pool calculations • Prize payment verification	• Fixed-odds betting controls • Settlement and winnings calculations • Cashout and resettlement controls • Pool-betting calculations and payment verification

ICS for lottery operations

The lottery module independently follows an accepted lottery entry from inclusion in a draw through prize determination and payment. Typical controls include:

- Verification that each accepted entry was included in the correct draw and checked against the official result
- Consistent application of the applicable game rules
- Independent identification of winning entries and calculation of prizes

- Correct formation of prize pools and application of prize tiers, deductions, carryovers and winning shares
- Verification that calculated prizes match the related payment, redemption or player account transactions

Control boundary. The ICS does not supervise the physical draw or certify the randomness of an RNG. It verifies that the official result and applicable game rules were applied correctly and consistently to accepted entries.

ICS for betting operations

The betting module independently follows an accepted bet from acceptance through settlement, cashout and payment. Typical controls include:

- Verification of accepted bets and the betting terms confirmed to players
- Checks that accepted bets comply with defined restrictions on permitted events and markets based on applicable legal and regulatory requirements
- Independent calculation of the expected settlement and winnings based on the applicable result, accepted betting terms and game rules
- Verification that accepted cashout amounts, partial cashouts, cancellations and resettlements were processed correctly
- Verification of pool formation, deductions, carryovers, winning shares and allocation of the distributable amount
- Verification that calculated winnings and cashout amounts match the related payment or player account transactions

Control boundary. The ICS does not assess whether the odds or cashout value represent the correct commercial valuation of a market. It verifies that the terms accepted by each player were recorded correctly, the resulting calculations and transactions followed the applicable rules, and the same rules were applied consistently in comparable cases.

Value for a multi-product operator

For a multi-product operator, one ICS platform provides a common control, exception-handling and reporting process across lottery and betting operations. Product-specific modules apply the relevant data and game rules while retaining the same independent control principles.

This reduces fragmented control processes and provides ongoing evidence that players are treated fairly and paid correctly.