

EASTERN CAPE GAMBLING BOARD CASINO RULES

Issued under Section 81 of the Eastern Cape Gambling Act, 1997 (as amended)

Updated: September 2025

PART A: CONSTRUCTION AND DEFINITIONS

1. Promulgation, Amendment, Modification, and Repeal

These Rules are issued under Section 81 of the Eastern Cape Gambling Act, 1997 (as amended) (“**Act**”). The Board may amend or repeal these Rules to reflect technological developments, operational risks, and evolving regulatory priorities.

2. Construction

These Rules must be interpreted in harmony with the Act, Regulations, and other applicable statutes. Where technology is deployed, such as AI-driven surveillance or IoT-enabled gaming terminals, compliance must be ensured across all legal instruments.

3. Severability

If any provision is found invalid, the remainder shall remain enforceable.

4. Definitions and Interpretation

Definitions follow the Act unless context dictates otherwise. New technologies require expanded interpretations of terms such as:

- **Asset number:** Includes digital identifiers for smart devices and networked systems.
- **Gambling day:** May be tracked via automated systems with timestamped logs.
- **Statistical win/drop:** May be derived from real-time analytics and machine learning models.

5. Calculation of Time Periods

Time periods exclude the first day and include the last.

6. Criminal Liability

Violations may result in fines or imprisonment. This includes digital misconduct such as unauthorized system access, data breaches, and manipulation of AI algorithms.

7. Non-Applicability

These Rules do not repeal existing provisions related to amusement games unless explicitly stated.

8. Commencement and Applicability

Rules take effect on a date published in the Provincial Gazette. Temporary exemptions may be granted to allow for system upgrades, cybersecurity compliance, or ethical realignment.

PART B: General Provisions

2.1. Improper Attempts to Obtain Information

Unauthorized access to Board records, including digital databases, cloud systems, and encrypted logs, is prohibited. All systems must implement access controls and audit trails.

2.2. Control of Evidence and Cheating Devices

2.2.1. Seized items, including digital cheating tools (e.g., tampered software, unauthorized firmware), must be securely stored.

2.2.2. Chain-of-custody protocols must include digital timestamps and forensic logs.

2.2.3. Disposal of cheating devices must be documented, including metadata and method of destruction.

2.3. Risk management requires secure evidence handling and protection against data tampering.

PART C: LICENCE APPLICATION

Casino Licence Requirements and Premises Suitability

3.1. Casino Licence Applications

- 3.1.1. Applications for a casino licence must demonstrate full compliance with the Act, Regulations, these Rules, and other applicable laws.
- 3.1.2. The Board shall assess the applicant's operational, financial, and managerial capacity to maintain a secure, ethical, and compliant casino environment.
- 3.1.3. Applications must include:
 - 3.1.3.1. A detailed business plan.
 - 3.1.3.2. Organisational structure and key personnel.
 - 3.1.3.3. ICT infrastructure overview.
 - 3.1.3.4. Security and surveillance protocols.
 - 3.1.3.5. Internal control procedures.
 - 3.1.3.6. Financial projections and source of funding.
 - 3.1.3.7. Proof of premises ownership or lease agreements.
 - 3.1.3.8. Any other documentation required by the Board.

3.2. Ownership of Premises where Gambling is Conducted

- 3.2.1. The Board may deem premises unsuitable for casino operations if any interest in the property is held by a person disqualified from holding a gambling licence, regardless of the qualifications of the applicant.
- 3.2.2. If the premises are not wholly owned by the applicant, the applicant must submit:
 - 3.2.2.1. The name and address of the property owner(s).
 - 3.2.2.2. Copies of lease or possession agreements.
 - 3.2.2.3. Any other information requested by the Board.
- 3.2.3. If the premises are wholly or partly owned by the applicant, the applicant must disclose:
 - 3.2.3.1. All third-party interests in the property.
 - 3.2.3.2. Details of mortgages, trusts, bonds, pledges, or other encumbrances.
 - 3.2.3.3. Any other information requested by the Board.
- 3.2.4. Licence holders must notify the Board of any change in ownership or interest in the premises:

- 3.2.4.1. At least thirty (30) days before the change, if the licence holder is a party to the transaction.
- 3.2.4.2. Immediately upon becoming aware of the change, if not a party to the transaction.

3.3. General Conditions of Licence

3.3.1. Any licence, registration, certificate of approval, or certificate of suitability issued by the Board is a revocable privilege, contingent upon the continuous suitability of the holder.

3.3.2. Empowerment and governance

3.3.2.1. The Licensee shall maintain an effective shareholding by Previously Disadvantaged Individuals (PDIs) at a minimum percentage as determined by the Board and stipulated in the Conditions of Licence.

3.3.2.2. Such shareholding shall include sub-allocations to Local PDIs and to women, youth, military veterans, and persons living with disabilities, in accordance with the thresholds and composition requirements set by the Board at licence award or as subsequently amended by the Board.

3.3.3. Socio-Economic Development

3.3.3.1. The Licensee shall contribute an annual percentage of Gross Gaming Revenue (GGR) to Socio-Economic Development (SED) initiatives, with the exact percentage and conditions determined by the Board and stipulated in the Conditions of Licence.

3.3.3.2. All SED initiatives must align with B-BBEE socio-economic strategies, and beneficiaries shall require prior Board approval. The Board may, at its discretion, direct that the SED contribution be paid into a centralised fund administered by or on behalf of the Board.

3.3.3.3. The Licensee shall submit an audited SED report within such a period determined by the Board from time-to-time, of financial year-end, evidencing the contribution amount, beneficiary details, impact metrics, and compliance with these requirements.

3.3.4. Tourism, Local Procurement and Employment Equity

3.3.4.1. The Licensee shall, on an annual basis, submit to the Board: (a) a Tourism and Local Development Plan, including initiatives to promote 'must-see' attractions and support for arts, culture, and sport; (b) a Local Procurement Plan with measurable targets for sourcing from Local PDIs, PDI Enterprises, women, youth, military veterans, persons living with disabilities, and SMMEs; and (c) an Employment Equity-aligned staffing plan, including internship targets and accredited training programmes.

- 3.3.4.2. The specific targets, thresholds, and reporting formats shall be determined by the Board and stipulated in the Conditions of Licence.
- 3.3.4.3. The Licensee shall file quarterly Key Performance Indicators (KPIs) and supporting evidence (e.g., spend analysis, jobs created, beneficiary participation), which shall be subject to verification by and review by the Board.
- 3.3.5. Guarantees and Zoning
 - 3.3.5.1. The Licensee shall maintain the Development Guarantee and the Licence Period Guarantee in the form, amount, and duration determined by the Board and stipulated in the Conditions of Licence.
 - 3.3.5.2. Any amendment, replacement, or reduction of such guarantees requires prior written consent of the Board and proof from a bank as defined in the Banks Act.
 - 3.3.5.3. The Licensee shall ensure that zoning approvals and any special consent applicable to the Licensed Premises remain valid and current throughout the Licence Period.
- 3.3.6. Temporary Casino (Where Applicable)
 - 3.3.6.1. Where a temporary casino is approved, the Licensee shall operate under a Board-approved Temporary Casino Plan. The plan shall detail surveillance arrangements, internal controls, consumer protection measures, milestones, and sunset/transition timelines.
 - 3.3.6.2. The specific requirements and conditions shall be determined by the Board and stipulated in the Conditions of Licence. The Licensee shall submit regular (period determined by the Board) progress reports to the Board until full transition to permanent operations is completed.
- 3.3.7. The Licensee shall complete an annual fit-and-proper review for directors, key employees, and significant shareholders, in accordance with the requirements determined by the Board and stipulated in the Conditions of Licence. Any adverse findings must be reported to the Board within seven (7) days of identification.
- 3.3.8. All obligations under these Rules shall be subject to Internal Audit verification and Board audits. The Licensee shall submit quarterly and annual reports through Board-designated channels, in the format and timelines stipulated in the Conditions of Licence.
- 3.3.9. The Board reserves the right to review, suspend, or revoke any licence or approval if the holder fails to maintain compliance with the Act, the Regulations, these Rules, or any conditions imposed by the Board.

PART D: LICENSED ACTIVITIES

4.1. Methods of Operation

- 4.1.1. Licence holders must operate ethically, securely, and in a manner that protects public welfare. This includes:
 - 4.1.1.1. Secure deployment of AI, IoT, and Big Data systems.
 - 4.1.1.2. Implementation of cybersecurity protocols.
 - 4.1.1.3. Ethical use of player data and predictive analytics.
- 4.1.2. Licence holders shall employ risk mitigation including regular system audits, penetration and vulnerability assessments, and staff training.
- 4.1.3. Gambling by owners or employees at their own establishments is prohibited.
- 4.1.4. All gambling devices must display responsible contact information.
- 4.1.5. Violations must be reported within twenty-four (24) hours, with follow-up actions submitted within seven (07) days.

4.2. Ground for Disciplinary Action

- 4.2.1. Activities deemed harmful or discrediting to the Province or the gambling industry are grounds for disciplinary action. Specific violations include:
 - 4.2.1.1. Poor judgment or failure to prevent reputational harm.
 - 4.2.1.2. Allowing visibly intoxicated persons to gamble or be served alcohol.
 - 4.2.1.3. Possession or use of cheating devices.
 - 4.2.1.4. Operating tampered or deceptive games.
 - 4.2.1.5. Conduct inconsistent with standards of decorum and decency.
 - 4.2.1.6. Issuing credit to settle third-party debts (with limited exceptions).
- 4.2.2. Digital misconduct, such as algorithmic bias, unauthorized data mining, or failure to secure IoT endpoints, may also trigger disciplinary action.
- 4.2.3. These provisions apply equally to registrants.

4.3. Gambling by owners, directors, officers and employees

- 4.3.1. Activities deemed harmful or discrediting to the Province or the gambling industry are grounds for disciplinary action. Specific violations include:

- 4.3.2. Individuals affiliated with a licence holder may not gamble at their own establishment or any establishment they own or operate.
- 4.3.3. Gambling policies must be submitted to the Board for approval.
- 4.4. Criminal Conviction
 - 4.4.1. Licence holders must notify the Board within 7 days of becoming aware of any criminal conviction involving owners, directors, officers, or employees. This includes cybercrime, data breaches, and digital fraud.
 - 4.4.2. The Board may **suspend**, or revoke licences based on reputational and operational risk.
- 4.5. Ownership Identification on Gambling Devices
 - 4.5.1. All devices, including smart terminals and cloud-based platforms, must display contact information for repairs, payouts, and dispute resolution. QR codes or digital tags may be used.
 - 4.5.2. Devices lacking this information may not be exposed for play.
- 4.6. Reports of Violations
 - 4.6.1. Licence holders must report any cheating or legal violations to the Board within 24 hours. This includes:
 - 4.6.1.1. System breaches.
 - 4.6.1.2. AI malfunctions affecting game outcomes.
 - 4.6.1.3. Suspicious data patterns.
 - 4.6.2. Follow-up details of actions taken must be submitted within 7 days, including forensic reports and mitigation steps.
- 4.7. Access to Premises, Information, and Records
 - 4.7.1. Licence holders must report any cheating or legal violations to the Board within 24 hours.
 - 4.7.2. Licence holders must comply with lawful requests for records or information.
 - 4.7.3. The Board must have unrestricted access to premises and equipment.
 - 4.7.4. Required documentation varies by entity type:
 - 4.7.4.1. Companies: Articles of association, business certificate, shareholder and director registers, meeting minutes.
 - 4.7.4.2. Partnerships: Partnership agreement, partner details, capital contributions, withdrawals.
 - 4.7.4.3. Sole Proprietorships: Investment records and financial activity.

4.7.5. Licensee holders must:

- 4.7.5.1. Provide digital and physical records upon request.
- 4.7.5.2. Allow access to cloud systems, databases, and connected devices.
- 4.7.5.3. Maintain documentation including:
 - 4.7.5.3.1. System architecture diagrams.
 - 4.7.5.3.2. Software version logs.
 - 4.7.5.3.3. Data and information governance policies.

4.8. Collection of Gambling Credit

4.8.1. Only authorised parties may collect gambling credit. Digital collection system must:

- 4.8.1.1. Authenticate users.
- 4.8.1.2. Encrypt transactions.
- 4.8.1.3. Log all activity for audit purposes.

4.8.2. Persons deemed unsuitable or denied licensing may not participate in credit collection.

4.8.3. Licence holders must maintain records of all credit collection arrangements, including contracts (unless involving key employees or junket agents).

PART E: REPORTS, REFUNDS AND UNDERPAYMENTS

5. Overarching Policy Compliance Statement

All licensees are required to maintain accurate, timely, and transparent reporting of gambling revenues, taxes, and related financial transactions in accordance with the Act and applicable regulations. PART E establishes mandatory standards for the submission of reports, processing of refunds, and rectification of underpayments to ensure revenue integrity and regulatory compliance.

5.1. Extension of time for reporting - the CEO may extend reporting deadlines. Digital systems must support automated reminders, secure submissions, and timestamped records.

5.2. Claims for Refunds

5.2.1. Licence holders must submit:

5.2.1.1. Legal basis for the claim.

5.2.1.2. Calculations supported by system-generated reports.

5.2.1.3. Submission within 6 months of financial year-end.

5.2.2. Digital audit trails and financial dashboards must support refund verification.

5.3. Additional Assessment for Underpayment

5.3.1. The Board may issue additional assessments based on system data.

5.3.2. Payment is due within **seven (07)** days unless extended.

5.3.3. If records are missing, the Board may estimate amounts using:

5.3.3.1. Legal basis for the claim.

5.3.3.2. Calculations supported by system-generated reports.

5.3.3.3. Submission within 6 months of financial year-end.

5.3.4. Transaction logs.

5.3.5. Machine learning models.

5.3.6. Historical benchmarks.

PART F: PILLARS OF MODERN GAMBLING REGULATION

6. Overarching Policy Compliance Statement

In recognition of the rapid digital adoption, emerging technologies, and associated risks within the gambling industry, all licensees shall comply with the PILLARS OF MODERN GAMBLING REGULATION as prescribed by the ECGB. These pillars establish a forward-looking regulatory framework that prioritizes ethical conduct, data protection, and operational resilience to safeguard the public interest and maintain regulatory trust.

6.1. Responsible and Ethical Gambling

6.1.1. Licence holders must promote responsible gambling through:

- 6.1.1.1. Self-exclusion mechanisms.
- 6.1.1.2. Behavioural analytics to detect risky patterns.
- 6.1.1.3. Staff training on intervention protocols.

6.1.2. Ethical conduct must guide all player interactions, marketing, and system design.

6.1.3. Responsible Gambling and Proximity

- 6.1.3.1. The Licensee shall maintain a Responsible Gambling Implementation Plan, updated annually, addressing measures for: prevention of under-18 gambling; protocols for unattended minors; proximity-risk mitigations for schools, places of worship, and other sensitive sites; intoxication management; and public safety.
- 6.1.3.2. The specific scope, standards, and reporting requirements shall be determined by the Board and stipulated in the Conditions of Licence.
- 6.1.3.3. The Licensee shall submit quarterly reports on key metrics, including self-exclusion usage, interventions, referrals, and proximity-related incidents. Non-compliance may result in remedial directives, penalties, or other sanctions as prescribed by the Board.

6.2. Data Privacy

6.2.1. All personal and transactional data must be:

6.2.1.1. Collected lawfully.

6.2.1.2. Stored securely.

6.2.1.3. **Used transparently.**

6.2.2. Systems must comply with national and international data protection standards (e.g., POPIA).

6.2.3. The Licensee shall file an annual POPIA compliance attestation confirming lawful processing of personal information, data security measures, incident response protocols, and adherence to data subject rights.

6.3. Business Resilience

6.3.1. Licence Holders must maintain:

6.3.1.1. Disaster recovery plans.

6.3.1.2. Cyber and/ or information security incident response protocols.

6.3.1.3. Redundancy in critical systems.

6.3.1.4. 3rd or 4th Party Management Controls.

6.3.2. Resilience planning must include:

6.3.2.1. Risk assessments (**penetration and vulnerability**).

6.3.2.2. Business continuity strategies.

6.3.2.3. Regular testing of backup and recovery infrastructure.

PART G: MINIMUM INTERNAL CONTROL STANDARDS

7. Overarching Policy Compliance Statement

All licensees shall implement, maintain, and continuously adhere to the Minimum Internal Control Standards (MICS) prescribed by the ECGB. These standards are designed to safeguard the integrity of gambling operations, ensure accurate revenue reporting, protect player interests, and uphold regulatory trust. Compliance with MICS is mandatory and forms a condition of licensing under the Act and applicable national legislation.

7.1. **Application** - Applies exclusively to holders or applicants of casino licences.

7.2. Definitions

7.2.1. **“Cage” / “Cashier Cage” / “Cash Desk”** - A secure physical structure adjacent to the gambling area that serves as the central location for:

7.2.1.1. Custody of cage inventory including currency, patron deposits, chips, tokens, plaques, and related records.

7.2.1.2. Receipt, distribution, and redemption of chips, tokens, and plaques in accordance with approved internal controls.

7.2.1.3. Issue, receipt, and reconciliation of imprest funds for operational use.

7.2.1.4. Support of digital payment systems and smartcard transactions, with coins held solely for patron cash-out purposes.

7.2.1.5. Oversight of cash equivalents and secure handling of physical currency where applicable

Note: All references to cheque handling have been removed. Cheques are no longer accepted or issued in casino operations.

7.2.2. **“Cash Equivalent”** - Means instruments or methods accepted for gambling-related transactions, including:

7.2.2.1. Recognised money orders payable to the casino licence holder.

7.2.2.2. Recognised bank and/or credit cards presented under the licence holder’s approved internal control system.

Note: Cheques and travellers’ cheques are no longer accepted in casino operations.

7.2.3. **“Casino Supervisor”** - A person employed in the operation of a casino in a supervisory capacity or empowered to make discretionary decisions governing casino operations. Includes inspectors, floor persons, shift managers, Gaming Floor Managers, and the General Manager.

The role of Assistant Casino Manager is no longer standard and is excluded.

- 7.2.4. **“General Manager”** - The individual located at the licensed casino facility who is ultimately responsible for the daily conduct of the casino and hotel operations, including gambling activities, staff oversight, and compliance enforcement.

Replaces legacy references to “Chief Executive Officer” or “Managing Director.”

- 7.2.5. **“Compensation”** - All direct or indirect payments for services performed, including salary, wages, bonuses, deferred payments, overtime, and premium payments.

- 7.2.6. **“Drop” - For a Gambling Machine including electronic gambling machine, physical or digital drop means:**

7.2.6.1. **Physical - In environment using cash and physical tokens, *drop* refers to the total amount of gambling machine tokens, or notes located in the machine’s drop box or note acceptor.**

7.2.6.2. **Digital - In a cashless casino, *drop* refers to the total value of electronic credits transferred from patron accounts, smart cards, or digital wallets into the gaming system during a shift or accounting period.**

For a Table Game, physical or digital drop means:

7.2.6.3. **Physical - In environment using cash and physical tokens, *drop* refers to the total amount of currency, chips, tokens, and credit markers contained in the drop box.**

7.2.6.4. **Digital - In a cashless casino, *drop* refers to the total value of electronic credits transferred from patron accounts or digital wallets into the gaming system, recorded as part of the electronic drop ledger.**

Electronic drop data must be securely logged, timestamped, and reconciled against system activity.

- 7.2.7. **“Handle” - For a Gambling Machine including electronic gambling machine, physical or digital handle means:**

7.2.7.1. **Physical - In environment using cash and physical tokens, *handle* refers to the total amount of notes, tokens, or credits wagered by patrons.**

7.2.7.2. **Digital - In a cashless casino, *handle* refers to the total value of electronic credits played, including those transferred via smart cards, mobile apps, or biometric-linked accounts.**

Handle reflects total betting activity, regardless of medium.

- 7.2.8. **“Imprest / Imprest Basis” - For a Gambling Machine including electronic gambling machine, physical or digital drop means:**

7.2.8.1. **A replenishment system where cashier’s cage and gambling booth funds are restored to original levels based on net expenditures.**

7.2.8.2. In cashless environments, imprest principles apply to digital float accounts, requiring reconciliation of virtual credits and expenditures.

Still requires oversight by a higher authority to validate transactions before replenishment.

7.2.9. **“Incompatible Function”**

7.2.9.1. A role that allows a person or department to both commit and conceal errors or fraud.

7.2.9.2. In cashless systems, this includes access to digital wallets, transaction logs, and system overrides.

Segregation of duties must extend to IT, finance, and surveillance teams.

7.2.10. **“Jackpot” - Means any money or thing of value to be paid to patron.**

7.2.10.1. Gambling Machines: Triggered by specific winning combinations.

7.2.10.2. Table Games: Includes progressive jackpots.

7.2.10.3. Cashless Systems: Jackpots may be credited directly to patron accounts or issued via digital vouchers.

Requires secure digital payout protocols and audit verification

7.2.11. **“Integrated Security and Surveillance Department Member” - Means any person employed by a casino licence holder to perform both physical security and surveillance functions within the establishment.**

7.2.11.1. These members are responsible for ensuring regulatory compliance, detecting anomalies, preventing fraud, and maintaining the integrity of gambling operations. Surveillance personnel may operate from on-site control rooms or secure remote command centers, and their activities are governed by **the Digital Surveillance and Data Protection Protocols (DSDPP)**.

7.2.11.2. Responsibilities:

7.2.11.2.1. Provide physical security across the casino premises, including monitoring entrances, exits, and high-risk areas.

7.2.11.2.2. Escort and observe the movement of cash and cash equivalents between secure locations and the casino floor.

7.2.11.2.3. Conduct covert and overt surveillance of gambling operations using video cameras, recording equipment, and real-time monitoring systems.

- 7.2.11.3. Operational Note: These employees may operate under a unified department that merges traditional security roles with surveillance oversight, enhancing coordination and response capabilities.
- 7.2.11.4. Independence Clause: While surveillance duties are now integrated, internal controls must ensure impartiality and prevent conflicts of interest in monitoring casino-related operations and transactions.
- 7.2.12. **“Shift” - Refers** to a designated operational cycle within a **twenty (24)**-hour period during which a specific team of personnel is assigned duties related to the operation, administration, or supervision of gambling activities, including but not limited to table games, electronic gambling machines, cashier’s cage operations, satellite cages, and digital platforms.
 - 7.2.12.1. Shifts are structured in accordance with the licence holder’s Integrated Operational Control System (IOCS) as approved by the ECGB, which may include biometric access logs, AI-driven scheduling, and real-time workforce analytics.
 - 7.2.12.2. Shifts may be physical, hybrid, or virtual depending on the operational model and regulatory approval.

7.3. Organisational Structure

All casino licence holders shall develop, implement, and maintain a dynamic organisational structure that ensures operational integrity, regulatory compliance, and technological adaptability. The structure must provide for:

- 7.3.1. **Accountability Through Intelligent Command Systems** - A clearly defined system of personnel roles and chain of command, enhanced by **AI-driven accountability dashboards**, enabling real-time tracking of decisions, actions, and omissions. Management and supervisory personnel must be identifiable and accountable for all activities within their areas of responsibility, with audit trails embedded in operational systems.
- 7.3.2. Segregation of Incompatible Functions via Smart Access Controls - Automated segregation of duties using **role-based access control (RBAC)** and **biometric authentication**, ensuring that no employee can simultaneously perform, conceal, or override critical functions. This includes the use of **blockchain-based transaction logs** to prevent tampering and ensure transparency.
- 7.3.3. Continuous Supervision Through Multi-Layered Oversight - Deployment of **primary and secondary supervisory roles**, supported by **remote monitoring tools**, **AI-assisted transaction validation**, and **predictive risk alerts**, to ensure that all critical transactions are authorized and supervised at all times, including during hybrid or virtual operations.

7.3.4. Optimised Responsibility Zones - Design of operational areas and responsibilities using **workload analytics, digital twin simulations,** and **human-machine collaboration models,** ensuring that no individual is assigned a scope of responsibility that exceeds practical monitoring or decision-making capacity.

7.4. Departments and Supervisory Positions

7.4.1. Integrated Departmental Framework - In addition to the requirements of Rule 7.3, each casino licence holder shall establish and maintain a digitally integrated organisational structure and internal control system that includes the mandatory departments and supervisory positions outlined in sub-rules (2) to (11). Each department shall operate collaboratively yet independently, supported by secure data-sharing protocols, automated compliance alerts, and role-based operational firewalls to prevent conflicts of interest and ensure regulatory integrity.

7.4.2. **Standalone Surveillance Department**

7.4.2.1. A Surveillance Department shall be established and supervised by a Surveillance Manager, who shall comply with the reporting requirements in Rule 7.5.

7.4.2.2. The department shall leverage, including AI-enhanced surveillance systems, facial recognition, and real-time behavioural analytics to perform the following functions:

7.4.2.2.1. Covert monitoring of table games using smart vision systems.

7.4.2.2.2. Surveillance of gambling machines and digital currency acceptors.

7.4.2.2.3. Monitoring of cashier's cage and satellite cages via encrypted video feeds.

7.4.2.2.4. Automated recording and archiving of activities in hard and soft count rooms.

7.4.2.2.5. Detection of cheating, theft, embezzlement, and other illicit activities using anomaly detection algorithms.

7.4.2.2.6. Identification of excluded or prohibited individuals using biometric and identity databases.

7.4.2.2.7. Continuous monitoring and recording of unusual or illegal activities.

7.4.2.2.8. Immediate notification to relevant supervisors and the Board upon detection or initiation of recording of suspicious activities.

7.4.2.2.9. Real-time alerts for presence of excluded, **underage** or prohibited persons.

7.4.2.2.10. Maintenance of a **digital incident log**, integrated with the casino's compliance dashboard.

7.4.3. Internal Audit Department

7.4.3.1. An **Internal Audit Department** shall be supervised by an **Internal Audit Manager**, subject to the reporting requirements in Rules 7.5 and 7.35. This function may be centralized or outsourced to a certified third-party provider using secure audit platforms.

7.4.3.2. Responsibilities include:

7.4.3.2.1. Evaluation of internal controls including using automated audit tools and risk dashboards.

7.4.3.2.2. Monitoring compliance with internal control standards, legislation, and regulations.

7.4.3.2.3. Reporting non-compliance to executive management, the Board, and relevant committees.

7.4.3.2.4. Identification and reporting of material weaknesses in control systems.

7.4.3.2.5. Recommendation of corrective actions using predictive analytics and benchmarking.

7.4.3.2.6. Maintenance of audit records in secure, tamper-proof digital repositories.

7.4.4. Information Technology (IT) or Information and Communications Technology (ICT) Department

7.4.4.1. An **IT Department** (formerly EDP) shall be supervised by an **IT/ICT Manager**.

7.4.4.2. The department shall ensure the integrity, security, and reliability of all digital systems used in casino operations, including:

7.4.4.2.1. Management of access controls, encryption protocols, and cybersecurity frameworks.

7.4.4.2.2. Oversight of data storage systems including cloud-based and on-premises infrastructure.

7.4.4.2.3. Maintenance of hardware, software, and communications systems, including AI modules, gaming platforms, and regulatory reporting tools.

7.4.5. Table Games Department

- 7.4.5.1. A **Table Games Department** shall be established, supervised by a **Casino / Gaming Manager**.
- 7.4.5.2. The department shall oversee the operation and conduct of all **board-approved table games**, excluding functions such as the count process and system administration, which are deemed incompatible.
- 7.4.5.3. All operations must comply with **digitally logged internal control procedures**, including **real-time game monitoring, dealer performance analytics**, and **automated bet tracking systems**.
- 7.4.6. Gambling Machine Department
 - 7.4.6.1. A **Gambling Machine Department** shall be supervised by a **Gambling Machine / Gaming Manager**.
 - 7.4.6.2. The department shall be responsible for the operation, maintenance, and performance optimization of all board-authorized gambling machines, excluding the count process.
 - 7.4.6.3. Duties must align with internal control procedures and include remote diagnostics, predictive maintenance, and AI-driven game performance analytics.
- 7.4.7. Standalone Security Department
 - 7.4.7.1. A **Security Department** shall be supervised by a **Security Manager**.
 - 7.4.7.2. The department shall ensure the physical and digital security of the establishment, including:
 - 7.4.7.2.1. Enforcement of applicable laws and regulations.
 - 7.4.7.2.2. Protection of patrons and staff.
 - 7.4.7.2.3. Secure transport of assets using these may include **RFID-tracked containers** and **bodycam-equipped escorts**.
 - 7.4.7.2.4. Prevention and response to illegal activity using **AI-assisted threat detection**.
 - 7.4.7.2.5. Detainment procedures in line with the **Criminal Procedure Act, 1977**, with digital evidence capture.
 - 7.4.7.2.6. Logging of incidents using **immutable digital ledgers** with timestamped entries.
 - 7.4.7.2.7. Identification and removal of excluded or prohibited persons using **facial recognition** and **real-time watchlist alerts**.
 - 7.4.7.2.8. Full compliance with internal control protocols and data protection standards.

7.4.8. Integrated Surveillance and Security Department

7.4.8.1. Where surveillance and security are integrated following approval by the ECGB, there shall be an **Integrated Surveillance and Security Department**, supervised by a **Surveillance & Security Manager**, who shall be subject to the reporting requirements specified in Rule 7.5 and any applicable provisions of the Criminal Procedure Act, 1977 (Act No. 51 of 1977), as amended.

7.4.8.2. The department shall be responsible for the holistic monitoring, protection, and enforcement of operational integrity and safety across the licensed premises. Its responsibilities shall include, but not be limited to:

7.4.8.2.1. **Surveillance:**

7.4.8.2.1.1. Covert monitoring of table games, gambling machines, cashier's cage, and satellite cages.

7.4.8.2.1.2. Automated video and audio recording of activities in count rooms and sensitive areas.

7.4.8.2.1.3. Detection of cheating, theft, embezzlement, and other illegal or suspicious activities.

7.4.8.2.1.4. Identification of excluded or prohibited persons using biometric and AI-enhanced systems.

7.4.8.2.1.5. Maintenance of a secure digital incident log with immutable entries and audit trails.

7.4.8.2.1.6. Real-time alerts and notifications to relevant supervisors and the Board.

7.4.8.2.2. **Security:**

7.4.8.2.2.1. Covert monitoring of table games, gambling machines, cashier's cage, and satellite cages.

7.4.8.2.2.2. Automated video and audio recording of activities in count rooms and sensitive areas.

7.4.8.2.2.3. Enforcement of applicable laws and internal control procedures.

7.4.8.2.2.4. Protection of patrons, staff, and assets, including secure transport and escort operations.

7.4.8.2.2.5. Detainment of individuals suspected of illegal activity, with proper documentation and legal compliance.

7.4.8.2.2.6. Recording of all unusual occurrences using secure digital systems with backup protocols.

7.4.8.2.2.7. Coordination with law enforcement and regulatory bodies as required.

7.4.8.3. The department shall operate **with functional independence**, supported by role-based access controls, automated conflict-of-interest detection, and compliance-integrated surveillance platforms.

7.4.9. Casino Admin Accounting Department

7.4.9.1. A **Casino Accounting Department** shall be supervised by a **Controller** or **Unit Financial Manager**.

7.4.9.2. The department shall oversee the financial integrity of the casino, including:

7.4.9.2.1. Implementation of **automated accounting controls**.

7.4.9.2.2. Preparation and secure storage of financial records and operational data.

7.4.9.2.3. Oversight of digital forms, data reconciliation, and usage tracking.

7.4.9.2.4. Generation of financial and management reports using **real-time dashboards**.

7.4.9.2.5. Supervision of **hard count** and **gaming device count** processes using **AI-audited systems** and **blockchain-based reconciliation**.

7.4.10. Cashiers' Desk Department

7.4.10.1. The **Department** shall be established and supervised by a **Cashier Desk Manager**.

7.4.10.2. The **Cashier Desk Manager** shall report to the **Controller** or **Unit Financial Manager** and oversee the operations of the department, **gambling machine cashiers, change personnel, and casino runners**, with responsibilities tracked via **digital workflow systems**.

7.4.10.3. The Cashier Desk shall operate independently from the revenue count processes of table games and gambling machines to maintain functional segregation.

7.4.10.4. Responsibilities include, but are not limited to:

7.4.10.4.1. Custody and secure handling of currency, chips, tokens, plaques (where applicable), and associated digital and physical records, all tracked via **real-time asset management systems**.

7.4.10.4.2. Exchange, redemption, and consolidation of token of value instruments using **secure digital platforms**.

7.4.10.4.3. Receipt, distribution, and redemption of chips, tokens, and plaques, with **RFID tagging** and **automated reconciliation**.

7.4.10.4.4. Execution of all other functions traditionally associated with cashier booths, now enhanced by **biometric authentication**, **automated cash dispensers**, and **compliance-integrated transaction logs**.

7.4.11. **Structural Flexibility and Innovation**

The Board may approve **alternative reporting lines**, **revised titles**, or the **merger of departmental functions**, provided the licence holder demonstrates, through **risk assessments**, **process mapping**, and **compliance audits**, that no incompatible functions exist. Such structural innovations must be supported by:

7.4.11.1. **Digital governance frameworks**,

7.4.11.2. **Automated conflict-of-interest detection**, and

7.4.11.3. **Transparent reporting mechanisms** to ensure continued regulatory integrity.

7.5. **Reporting Requirements: Surveillance and Internal Audit Departments**

7.5.1. **The Surveillance & Security Manager** shall report directly to a member of executive management who **does not participate in daily casino operations**, and who holds a position at least equivalent to **CEO or GM**. The Board may approve alternative reporting lines if the licence holder demonstrates, **through risk mapping and functional segregation analysis**, that no incompatible functions exist.

7.5.2. **The Internal Audit Manager** shall report directly to **the Audit Committee** of the Board of Directors of the company or holding company. In the absence of an Audit Committee, reporting shall be made to **an independent non-executive director**, ensuring audit independence and oversight integrity.

7.6. **Regulatory Compliance Personnel and Logistics**

The licence holder shall provide *inter alia* **Office accommodation** for at least **two full-time** ECGB's personnel. **Overnight accommodation** for the personnel conducting scheduled regulatory work and on the licence holder's request including extended or unplanned inspections.

7.7. **Jobs Compendium Submission**

7.7.1. Preparation for approval.

7.7.1.1. Each casino licence holder or applicant shall prepare and maintain **a Jobs Compendium**, detailing job descriptions and lines of authority for all personnel involved in casino operations.

- 7.7.1.2. Unless otherwise directed, the Jobs Compendium must be submitted to the **Board at least sixty (60) days before** the projected commencement of operations.
- 7.7.1.3. The Board shall review the submission to ensure alignment with **the Act, Regulations, and Rules**, particularly regarding licensing, registration, and chain-of-command integrity.
- 7.7.1.4. Any deficiencies shall be communicated in writing, and the licence holder must make the necessary amendments.
- 7.7.1.5. Once deemed adequate, the Board shall issue formal approval.
- 7.7.1.6. No licence holder may commence gambling operations without an approved Jobs Compendium, unless otherwise directed by the Board.

7.7.2. Required Sections:

The Jobs Compendium shall include:

- 7.7.2.1. **An alphabetical table of contents listing** each position title, job code, and corresponding page number.
- 7.7.2.2. **An organogram** for each department/division showing direct and indirect lines of authority, with:
 - 7.7.2.2.1. Submission date,
 - 7.7.2.2.2. Superseded organogram date,
 - 7.7.2.2.3. Unique title or identifier.
- 7.7.2.3. **A job description for each position, organized by department/division, including:**
 - 7.7.2.3.1. Position title and department.
 - 7.7.2.3.2. Duties and responsibilities.
 - 7.7.2.3.3. Experience and education requirements.
 - 7.7.2.3.4. Access to sensitive areas and key control.
 - 7.7.2.3.5. Submission and supersession dates.
 - 7.7.2.3.6. Reference to the organogram page.

7.7.3. Amendments and Updates

- 7.7.3.1. Any proposed amendment to an approved Jobs Compendium must be submitted **to the Board prior to implementation**.
- 7.7.3.2. Unless otherwise directed, amendments must be **submitted 60 days before the** proposed effective date.

- 7.7.3.3. A complete and up-to-date Jobs Compendium must be **submitted every 24 months after** receiving a certificate of operation, unless otherwise directed by the Board.

7.8. Personnel assigned to the operation and conduct of table games and gambling machines

7.8.1. General Requirements

- 7.8.1.1. Each casino licence holder shall employ the personnel described in this Rule for the operation of its casino, regardless of the internal position titles used in its approved Jobs Compendium.
- 7.8.1.2. All functions must be performed only by individuals who hold the **appropriate registration, certification, or digital credential** as defined in the licence holder's approved Jobs Compendium and validated **through real-time personnel verification systems**.
- 7.8.1.3. Licence holders must maintain a **minimum staffing level** that ensures the **safe, secure, and compliant operation** of all table games and gambling machines, which may be supported by **AI-assisted scheduling and workload optimization tools**.

7.8.2. Table Games Department / Division - Personnel assigned to table games must operate in accordance with the approved internal control system and include:

- 7.8.2.1. Gaming / Gaming Technical / Casino Manager - Senior Management. The primary roles include but not limited to, managing daily operations of table games; responsibility for hiring, training, and termination of table games personnel; and ensuring compliance with the Act, Regulations, Rules, Policies of the Board, Conditions of Licence and any other applicable laws.
- 7.8.2.2. **Gaming Floor Manager (formerly Pit Clerk / Pit Boss)** - a second-level supervisor role, located at the gaming floor, with access to all, including digital systems. The Primary duties include but are not limited to:
 - 7.8.2.2.1. Oversees multiple inspectors and table game operations within assigned zones.
 - 7.8.2.2.2. Enters and verifies system data (e.g., fills, credits, credit instruments).
 - 7.8.2.2.3. Coordinates and Liaise with surveillance, cage, and compliance teams.
 - 7.8.2.2.4. Ensures adherence to internal controls and regulatory requirements.
 - 7.8.2.2.5. Manages staffing, shift changes, and operational escalations.

- 7.8.2.3. Inspector - a first-level supervisor.
 - 7.8.2.3.1. The primary roles for the casino inspectors include but not limited to, supervising dealers and table operations, ensuring compliance with game procedures and internal controls, reporting irregularities and escalating issues.
 - 7.8.2.3.2. The number of tables per inspector is governed by the ECGB approved internal controls.
- 7.8.2.4. Dealers - operate and conduct licensed or registered table games. The primary roles for the dealers include but not limited to, facilitating gameplay, enforcing which may include use accepted and approved digital technologies, i.e., RFID-enable chips, automated shufflers, and digital bet tracking systems.
- 7.8.3. Gambling Machines Department / Division - Personnel assigned to gambling machines must operate in accordance with the approved internal control system and include:
 - 7.8.3.1. Gaming / Gaming Technical / Casino Manager - Senior Management. The primary roles include but not limited to, managing daily operations of gambling machines; responsibility for hiring, training, and termination of gambling machines personnel; and ensuring compliance with the Act, Regulations, Rules, Policies of the Board, Conditions of Licence and any other applicable laws.
 - 7.8.3.2. Gaming Floor or Slot Manager (formerly Shift Manager) - a second-level supervisor role, located at the gaming floor, with access to all, including digital systems. The Primary duties include but are not limited to:
 - 7.8.3.2.1. Oversees the overall operation of gambling machines and related activities for each shift.
 - 7.8.3.2.2. Coordinates and Liaise with surveillance, cage, and compliance teams.
 - 7.8.3.2.3. Ensures adherence to internal controls and regulatory requirements.
 - 7.8.3.2.4. Manages staffing, shift changes, and operational escalations.
 - 7.8.3.3. Gambling Machine Supervisor - a first-level supervisor. The roles include, but are not limited to:
 - 7.8.3.3.1. Directly supervises operation of gambling machines and related activities for each shift.
 - 7.8.3.3.2. Monitors the Floor Attendants, ensures compliance with procedures, and addresses operational issues as delegated or within the said function or role.

7.8.3.4. Gambling Machine Attendant - operates gambling machines and relate activities and assist with manual jackpots payout as well as fills.

7.8.3.5. Gambling Machine Technician

7.8.3.5.1. Role: Responsible for the repair and maintenance of gambling machines and currency acceptors.

7.8.3.5.2. Reporting Line: Reports to the Gambling Machine Technical Manager; in their absence, to the Gambling Machine Manager or designate.

7.8.3.5.3. Independence: Must remain independent from attendants and supervisors to ensure integrity.

7.8.3.5.4. Technology Integration: **Utilises diagnostic software, remote monitoring tools, and digital maintenance logs.**

7.8.4. **Signing Authority Limitations:**

7.8.4.1. Principle - Signing authorities shall be defined strictly in accordance with the casino licence holder's **ECGB approved internal control procedures.**

7.8.4.2. Implementation

7.8.4.2.1. Role-based access and digital authentication protocols (e.g., biometric login, smart cards, or secure PINs) should be embedded in systems handling fills, credits, jackpots, and maintenance logs.

7.8.4.2.2. Segregation of **duties must** be enforced through system permissions to prevent conflicts of interest.

7.8.4.2.3. Audit Trails must be automatically generated for all sign-off actions, accessible to compliance and audit teams.

7.8.5. Flexibility in Personnel Utilisation:

7.8.5.1. Principle - The Rule does not restrict the casino licence holder from:

7.8.5.1.1. **Employing additional personnel beyond those listed.**

7.8.5.1.2. **Responding to directives from the Board to deploy** additional or specialised personnel **for effective control and supervision.**

7.8.5.2. Modern Application

7.8.5.2.1. Roles such as **Data Analysts, Compliance Technologists, Digital Surveillance Coordinators, and Responsible Gambling Officers may** be added to support evolving operational and regulatory needs.

7.8.5.2.2. The Board retains discretion to mandate additional staffing based on risk assessments, operational complexity, or emerging threats (e.g., cybersecurity, AI-driven fraud).

7.9. Gratuities - Compliance Statement

7.9.1. **Policy Requirement** - All procedures and policies regarding the payment of gratuities (tips) to staff must be clearly documented in the casino licence holder's **minimum standards of internal controls**.

7.9.2. **Approval** - These procedures and policies must be **approved by the Board** prior to implementation.

7.9.3. Morden Practice

7.9.3.1. Digital Tracking: Gratuity payments should be tracked electronically (e.g., via payroll or point-of-sale systems) to ensure transparency and auditability.

7.9.3.2. Disclosure: Staff and patrons should be informed of gratuity policies, including any pooling or distribution arrangements.

7.9.3.3. Compliance: **Regular reviews should be conducted to ensure gratuity handling aligns with approved internal controls and regulatory requirements.**

7.10. Patron Cash or Cash Equivalent Deposits

7.10.1. Documentation of Deposits and Withdrawals

7.10.1.1. Every **receipt or withdrawal** of a patron deposit must be documented using a **pre-numbered, multi-copy document**.

7.10.1.2. **Minimum Copies:** At least **two original duplicates**:

7.10.1.2.1. **One copy** to the patron.

7.10.1.2.2. **One copy** retained in the **case file** for accounting and reconciliation.

7.10.2. Required information on Document - The multi-copy document must include:

7.10.2.1. **Minimum Copies:** At least **two original duplicates**:

7.10.2.1.1. Identical **pre-printed or system-generated number(s)** on all copies.

7.10.2.1.2. Patron's **full name and signature**.

7.10.2.1.3. **Date** of deposit or withdrawal.

7.10.2.1.4. **Amount** deposited or withdrawn.

7.10.2.1.5. **Nature or description** of the transaction (e.g., cash deposit, chip redemption).

7.10.2.1.6. **Cashier's signature**, or if system-generated, the **cashier's full name** as an **electronic signature and/or self-service terminal serial number**.

7.10.3. Internal Control Procedures - **The licence holder's internal controls must include procedures to ensure accountability of patron deposits, including:**

7.10.3.1. Patron-Level Recordkeeping - Maintain a **detailed ledger** per patron: Dates of all deposits and withdrawals and A **running balance** of the patron's account.

7.10.3.2. Cashiers' Desk Inventory Tracking - Maintain a **current running balance** of all patron deposits held by the licence holder.

7.10.3.3. Daily Reconciliation - **Reconcile the total of all patron balances with the individual deposit/withdrawal records daily.**

7.11. Table Game Rules

7.11.1. **All controls governing the day-to-day operations of casino tables must be documented in the licence holder's Internal Controls Manual, subject to Board approval.**

7.11.2. Key or minimum Operational Areas include but are not limited to:

7.11.2.1. **Table Opening and Closing Procedures.**

7.11.2.2. **Dealer Duties and Conduct.**

7.11.2.3. **Table Limits (min/max bets).**

7.11.2.4. **Order of Payouts.**

7.11.2.5. **Inspector Duties.**

7.11.2.6. **Chip Change Procedures.**

7.12. Call bets and announced bets: Table Games

7.12.1. Call Bet

7.12.1.1. **A call bet** is a verbal wager made to the **dealer accompanied by chips or cash** sufficient to cover the bet.

7.12.1.2. **Permitted, subject to procedures defined in the approved internal controls.**

7.12.2. Announced Bet

7.12.2.1. **An announced bet** is a verbal wager **not accompanied by chips, plaques, or cash.**

7.12.2.2. Includes **marked bets** (supplemental bets made during a hand).

7.12.2.3. **Prohibited** - any such bet is **void.**

7.12.3. Internal Control Requirements

- 7.12.3.1. Procedures for **handling call bets** must be clearly outlined in the licence holder's **internal control procedures** and approved by the Board.
- 7.12.3.2. **Surveillance and table staff must be trained to identify and void announced bets.**

7.13. Fills and Credits Compliance Statement

- 7.13.1. **Policy Requirement** - All processes and procedures relating to **fills and credits** must be clearly documented in the **casino** licence holder's minimum standards of internal controls (ICS). These must include:
 - 7.13.1.1. Transaction authorization protocols.
 - 7.13.1.2. Segregation of duties.
 - 7.13.1.3. Slip issuance, numbering, and retention.
 - 7.13.1.4. Reconciliation and audit procedures.
 - 7.13.1.5. **Technology integration and surveillance visibility.**
- 7.13.2. **Approval** - All fills and credits procedures, including **any amendments**, must be **approved by the Board** prior to implementation. The Board retains discretion to require enhancements or additional controls where necessary for effective supervision and risk mitigation.

7.14. Soft Count Compliance Statement

- 7.14.1. Policy Requirement - All procedures and controls relating to **the soft count process and the count room environment** must be clearly documented in **the casino licence holder's minimum standards of internal controls (ICS)**.
- 7.14.2. Approval - These procedures, including **any amendments**, must be **approved by the Board** prior to implementation. The Board retains discretion to require enhancements or additional controls where necessary for effective supervision and risk mitigation.
- 7.14.3. Minimum Requirements or Themes to be included in the ICS
 - 7.14.3.1. Physical Security and Infrastructure
 - 7.14.3.1.1. Count room must be **separate from gambling areas**, constructed of **solid materials**, with **no windows or wall apertures**.
 - 7.14.3.1.2. Steel-lined **door, spy hole**, and **internal locking mechanism**.
 - 7.14.3.1.3. Emergency **lighting system** (minimum 8-hour duration). Air **conditioning** with internal controls.
 - 7.14.3.2. Surveillance & Monitoring
 - 7.14.3.2.1. Digital Surveillance with audio, covering, drop box removal and transport, count process, and storage area access.

- 7.14.3.2.2. Surveillance must be **continuous**, with **alerts for unauthorized access**.
- 7.14.3.3. Access Control
 - 7.14.3.3.1. Entry restricted to authorised personnel.
 - 7.14.3.3.2. Surveillance must be notified prior to entry.
 - 7.14.3.3.3. Observers, inspectors, and maintenance staff may enter on if properly authorised.
- 7.14.3.4. Count Table Specification
 - 7.14.3.4.1. Made of clear **toughened glass** or equivalent.
 - 7.14.3.4.2. No obstructions above/below.
 - 7.14.3.4.3. Partitioning to separate counted vs. uncounted items.
- 7.14.3.5. Emergency Communication
 - 7.14.3.5.1. **Panic alarm** and **internal telephone** within reach of count clerk.
 - 7.14.3.5.2. Optionally, **AI-driven surveillance alerts** (e.g., gesture recognition, audio triggers).
- 7.14.3.6. Operational Procedures
 - 7.14.3.6.1. Minimum number of **count team members** rotated routinely.
 - 7.14.3.6.2. Number of persons to exit during count until completion, if any.
 - 7.14.3.6.3. Language spoken during count.
 - 7.14.3.6.4. Drop boxes must be **individually emptied and counted**, one at a time.
 - 7.14.3.6.5. Count recording in **permanent format** (ink or digital).
 - 7.14.3.6.6. Currency **counter usage** must be observed.
- 7.14.3.7. Reconciliation and Documentation
 - 7.14.3.7.1. Count sheet reconciled by a **non-recording team member**.
 - 7.14.3.7.2. All team members and accounting rep must **sign and print names**.
 - 7.14.3.7.3. Cash Desk must **certify receipt and accuracy**.
 - 7.14.3.7.4. Supporting documents delivered to accounting or placed in **locked container**.
- 7.14.3.8. Overnight Security (where count occurs the next day)

- 7.14.3.8.1. Drop Boxes stored in **lockable shelving or safe**, under surveillance.
- 7.14.3.8.2. Monitor **and door sensors** connected to alarm system.
- 7.14.3.8.3. Alarm must be **armed**, with **10-second delay control** inside room.
- 7.14.3.9. Audit and Exemption Handling
 - 7.14.3.9.1. All discrepancies investigated and documented.
 - 7.14.3.9.2. Threshold for review: **5% or R1,000**, whichever is greater.
 - 7.14.3.9.3. Corrections to manual records must be **crossed out, corrected, and signed by two team members**.

7.15. Key Control Compliance Statement

- 7.15.1. Policy Requirement - All procedures and controls relating to **key management**, including issuance, custody, access, duplication, destruction, and logging, must be clearly documented in the casino licence holder's minimum standards of internal controls (ICS).
- 7.15.2. Approval - These procedures, including **any** amendments, must be approved by the Board **prior** to implementation. The Board retains discretion to require enhancements or additional controls where necessary for effective supervision and risk mitigation.
- 7.15.3. Minimum Requirements or Themes to be included in the ICS
 - 7.15.3.1. Key Categories
 - 7.15.3.2. Custody and Access Control
 - 7.15.3.2.1. Custody must be **independent of** the operational department (e.g., table games or gambling machines).
 - 7.15.3.2.2. Access must require multi-person authorization, typically **from at least two or three separate departments**, one of which must be **Security**.
 - 7.15.3.2.3. Surveillance must be notified and **must** observe and record all key access events, especially for drop box contents and duplicate keys.
 - 7.15.3.3. Restrictions
 - 7.15.3.3.1. Staff authorized to **remove drop boxes must** not have access to **drop box contents keys**.
 - 7.15.3.3.2. Staff **accessing storage rack keys must** not also access **release keys**, except for count team during reset.

- 7.15.3.3.3. Unscheduled access to sensitive keys (e.g., drop box contents) must be **authorized by** casino management, documented with signatures and reasons, and observed and recorded **by surveillance.**
- 7.15.3.4. Key Storage and Security
 - 7.15.3.4.1. **Keys must be stored in secure, monitored locations.**
 - 7.15.3.4.2. Duplicate **keys must** be stored with **the same** level of **control as** active keys.
 - 7.15.3.4.3. Digital surveillance must cover all key storage areas 24/7.
- 7.15.3.5. Key Logs
 - 7.15.3.5.1. Logs must be maintained for all key categories listed above.
 - 7.15.3.5.2. Logs must include date/time of issuance and return, signatures and printed names or employee numbers of custodians and recipients.
 - 7.15.3.5.3. Logs must be:
 - 7.15.3.5.3.1. Inspected by Internal Audit.
 - 7.15.3.5.3.2. Retained for at least two years.
 - 7.15.3.5.3.3. **Completed in** ink or permanent format.
- 7.15.3.6. Issuance, Duplication and Destruction
 - 7.15.3.6.1. Must be authorized and verified **by at** least two departments, **including Security.**
 - 7.15.3.6.2. Detailed Records must be kept for:
 - 7.15.3.6.2.1. Type of key.
 - 7.15.3.6.2.2. Number issued, duplicated, or destroyed.
 - 7.15.3.6.2.3. Date, reason, and signatures of involved personnel.

7.16. Table games computer generated documentation

7.16.1. System capability - Computer systems used to record table games transactions must be capable of **generating complete and accurate documentation of** all information recorded on source documents and transaction details, including but not limited to:

- 7.16.1.1. Fills and credit slips.
- 7.16.1.2. Markers.

7.16.1.3. Table Activity Logs.

7.16.1.4. Exception reports.

7.16.2. Access Control - Access to all computer-generated documentation shall be:

7.16.2.1. Restricted to authorised personnel.

7.16.2.2. Segregated from incompatible functions.

7.16.2.3. Enforced through secure authentication protocols (e.g., passwords, biometrics, smart cards).

7.16.3. Required Documentation Outputs - Computer-generated documentation must include, at minimum:

7.16.3.1. System Exception (voids, corrections, system parameter changes, any other exception or override activity).

7.16.3.2. Personnel Access Listing (employee name, employee identification number, listing of functions the employee is authorised to perform, or an equivalent access mapping).

7.16.4. Data Integrity and Audit Trail

7.16.4.1. **All transactions must be time-stamped and non-editable once finalized.**

7.16.4.2. The system must maintain a **complete audit trail** of data entries, modifications, voids, and authorisations.

7.16.5. Data Retention and Security

7.16.5.1. All documentation must be retained in accordance with applicable regulatory requirements.

7.16.5.2. Systems must be protected against unauthorized access, tampering, and data loss.

7.16.5.3. Regular **backups and security reviews must be conducted.**

7.17. Playing Cards

7.17.1. Policy Requirements - All procedures and controls relating to **the receipt, storage, issuance, reconciliation, and destruction of playing cards must** be clearly documented in **the casino licence holder's minimum standards of ICS.**

7.17.2. Approval - These procedures and controls must **be approved by the Board prior** to implementation, including any amendments. The Board retains discretion to require **enhancements or additional controls where necessary for effective supervision and risk mitigation.**

7.17.3. Minimum Requirements or Themes to be included in the ICS

- 7.17.3.1. Storage and Security - All playing cards not yet issued to the pit must be stored in a locked and secure location to prevent unauthorised access and minimise the risk of tampering or manipulation.
- 7.17.3.2. Receipt and inventory verification
 - 7.17.3.2.1. Upon receipt from the manufacturer: an inventory of the playing cards must be conducted by a representative of the surveillance department, and a representative of the casino administration department.
 - 7.17.3.2.2. Both representatives must, verify the quantity and integrity of the shipment, Sign the inventory document, and print their names under their signatures.
- 7.17.3.3. Recordkeeping - Maintain complete and accurate records of cards distributed to table games personnel and cards collected and destroyed.
- 7.17.4. Monthly Reconciliation - the casino administration department must conduct at least a monthly count of playing card inventory and reconcile this to purchases, distributions, and destructions.
- 7.17.5. Documentation and evidence - All inventory and reconciliation sheets must be signed by the personnel conducting the checks, with printed names as evidence.

7.18. Table Games Accounting and Auditing Procedures

- 7.18.1. Independence - All accounting and auditing procedures for table games must be performed by personnel who are independent of the transactions being audited or accounted for, and who have no incompatible functions.
- 7.18.2. Reconciliation Reporting - A daily reconciliation must be prepared, including drop per table, win per table, and total gross gambling revenue. Reconciliations must also be prepared for week-to-date and month-to-date periods. These reconciliations must provide all information necessary for the preparation of gambling tax and VAT returns.
- 7.18.3. System Reconciliation - If a table game is equipped to determine drop (e.g., bill-in/coin-drop meters, currency acceptors, computerized records), the system-recorded drop must be reconciled to the actual drop on a daily basis.
- 7.18.4. Exception Reporting - Accounting and auditing personnel must review exception reports from all computerized table games systems at least monthly for: Propriety of transactions and Unusual occurrences.
- 7.18.5. Investigation and Documentation - Any improper transactions or unusual occurrences discovered during exception report reviews must be: investigated, documented, and maintained for Board auditing or inspection.

7.18.6. Audit Process Documentation - The licence holder **must** document the audit process **and** the procedures used for auditing table games and exception follow up, in their internal controls.

7.19. Emergency Clearances - Tables

7.19.1. Definition & Purpose - Emergency clearances refer to exceptional procedures that allow access to gambling tables or associated equipment outside of routine operations, typically due to technical faults, security concerns, or operational disruptions.

7.19.2. Internal Control Requirements

7.19.2.1. Documented Procedures - The licence holder must include detailed emergency clearance procedures in their internal control manual.

7.19.3. Board Approval - These procedures must be submitted to and approved by the Board.

7.19.4. Security & Surveillance - Emergency clearances must be conducted under surveillance and logged, with access restricted to authorized personnel.

7.19.5. **Audit Trail** - Each clearance must be recorded, including the reason, personnel involved, time, and outcome, to ensure accountability and compliance.

7.20. Gambling Machines Drop Rules

7.20.1. Personnel & Oversight

7.20.1.1. Minimum of two employees - required for any physical drop or device clearance: one from Security or Surveillance and once from Audit or Count Team.

7.20.1.2. Cashless Environment - physical drops may be replaced by the digital reconciliation, subject to systems audit trails, real-time monitoring, and Board approved protocols.

7.20.2. Security & Surveillance

7.20.2.1. Physical Movements - containers (where applicable) must be escorted by security and under continuous surveillance coverage.

7.20.2.2. Cashless Environment - surveillance must monitor system access logs, transaction anomalies, and device tempering alert.

7.20.3. Procedure Submission - in recognition of evolving operational models, including cashless systems and lean staffing structures, the following procedures shall apply:

7.20.3.1. Drop & clearance procedures - all, whether physical or digital, must be documented in the internal controls and submitted to the Board for approval 1 (one) month prior implementation.

7.20.4. Change Management - any change in drop time or sequence must be:

- 7.20.4.1. Submitted to the Board at least two weeks prior to the intended change.
- 7.20.4.2. Accompanied by a **justification** and updated risk mitigation measures.
- 7.20.4.3. Reflected in the **internal control documentation** and surveillance plans.

7.21. Currency Acceptor Drop and Countr Rules

7.21.1. **Regulatory Compliance Statement** - The licence holder shall ensure that all currency acceptor drop and count activities are conducted under secure, controlled, and auditable conditions. Procedures shall include dual custody, restricted access, independent reconciliation, and comprehensive record-keeping, with all processes aligned to approved internal controls and adaptable to both physical and cashless operational models.

7.21.2. Drop Box Removal and Transport

- 7.21.2.1. Currency acceptor drop boxes (where still applicable) must be:
 - 7.21.2.1.1. Removed by an employee independent of the gambling machine department.
 - 7.21.2.1.2. Placed in **locked trolleys**.
 - 7.21.2.1.3. Transported directly to a **secure count area** (e.g., soft count room or equivalent).
 - 7.21.2.1.4. **Locked and secured** until the count takes place
- 7.21.2.2. A **minimum of three employees** must perform the removal and transport:
 - 7.21.2.2.1. At least one from **Security or surveillance**
 - 7.21.2.2.2. Others must be independent of the gambling machine department
 - 7.21.2.2.3. Surveillance coverage must be continuous during transport.

7.21.3. Count Room Protocols

- 7.21.3.1. The count must occur in a **secure area** with controls equivalent to a soft count room.
- 7.21.3.2. A **minimum of three persons** must perform the count.
- 7.21.3.3. The count team must be **independent** of the gambling machine department and any related transactions.

7.21.4. Cashless Adaptation

7.21.4.1. In cashless environments, the count process refers to:

7.21.4.1.1. Digital reconciliation of currency acceptor transactions

7.21.4.1.2. System-generated reports matched against machine meters

7.21.4.1.3. Audit trail reviews by independent personnel

7.21.4.2. Surveillance must monitor:

7.21.4.2.1. System access and transaction logs

7.21.4.2.2. Currency counter operations (if used)

7.21.4.2.3. Rejected currency handling

7.21.5. Count Integrity and Documentation

7.21.5.1. Each drop box must be:

7.21.5.1.1. Individually emptied and counted

7.21.5.1.2. Prevent commingling of funds until the count is permanently recorded

7.21.5.1.3. Shown empty to another count team member and surveillance camera

7.21.5.2. Counts must be:

7.21.5.2.1. Recorded in ink or permanent digital form.

7.21.5.2.2. Compared daily to machine meter readings.

7.21.5.2.3. Variances must be investigated and reported per internal controls.

7.21.5.3. Corrections must be:

7.21.5.3.1. Made by crossing out the error, entering the correct figure.

7.21.5.3.2. Initialled by the count room supervisor and one verifying team member

7.21.6. Reconciliation and Accountability

7.21.6.1. Total drop must be:

7.21.6.1.1. **Reconciled** by the count team supervisor and one other team member

7.21.6.1.2. **Attested** by all count team members and a casino accounts department representative

7.21.6.2. After reconciliation:

7.21.6.2.1. All monies must be turned over to the **cage cashier**, who is independent of the count team

7.21.6.2.2. The **vault/cage representative** must certify the accuracy and assume responsibility

7.21.7. Access Control

7.21.7.1. Access to **stored full drop boxes** is restricted to authorized drop and count team members

7.21.7.2. Access to the **count room during the count** is restricted, with exceptions for:

7.21.7.2.1. Board inspectors

7.21.7.2.2. Supervisors resolving issues

7.21.7.2.3. Maintenance personnel

7.21.7.2.4. Authorized personnel collecting empty boxes

7.21.7.3. All non-count team personnel must be accompanied by Security at all times

7.21.8. Delivery of Count Documentation -count sheet and supporting documents must be:

7.21.8.1. Delivered promptly to the accounting department.

7.21.8.2. Or secured in a locked container accessible only to accounting personnel.

7.22. Emergency Clearances Procedure

Regulatory Compliance Statement - the licence holder shall ensure that all emergency clearances involving the removal of funds from gambling machines are conducted in a secure, transparent, and accountable manner. Procedures shall include defined trigger conditions, real-time oversight, detailed logging, immediate reconciliation, and regular review, in alignment with approved internal controls and regulatory requirements.

7.22.1. Definition and Scope

Emergency clearances refer to **non-routine interventions** required to access or remove coin or note contents from gambling machines or associated devices due to:

- 7.22.1.1. Technical faults.
- 7.22.1.2. Security breaches
- 7.22.1.3. System malfunctions
- 7.22.1.4. Operational disruptions (e.g., jammed acceptors, overflow alerts)

This applies to both physical currency environments and hybrid/cashless systems where note acceptors or coin mechanisms remain in use.

7.22.2. Procedure Requirements

- 7.22.2.1. All emergency clearance procedures must be:
 - 7.22.2.1.1. Documented in the licence holder's internal controls
 - 7.22.2.1.2. Approved by the Board prior to implementation
- 7.22.2.2. Procedures must include:
 - 7.22.2.2.1. **Trigger conditions** for emergency clearance
 - 7.22.2.2.2. **Roles and responsibilities** (minimum of two personnel, including one from Security or Surveillance).
 - 7.22.2.2.3. **Surveillance coverage** (real-time digital monitoring and recording).
 - 7.22.2.2.4. **Logging and reporting** of the incident, including time and reason for clearance, personnel involved, and outcome and reconciliation details.
- 7.22.2.3. Cashless Environment - in cashless or hybrid setups:
 - 7.22.2.4. Emergency clearance may involve **system overrides, Manual retrieval of jammed notes, Resetting of note acceptors or coin mechanisms.**
 - 7.22.2.5. All actions must be **logged digitally, Monitored by Surveillance, and Reviewed by Audit or Compliance personnel.**

7.22.3. Post-Clearance Protocol - all cleared contents must be **counted and reconciled** immediately, **verified against machine meter readings, and reported to the Board** if variances exceed thresholds

7.22.4. A **post-clearance report** must be compiled and retained for inspection, including incident summary, reconciliation results, and corrective actions taken.

7.23. Hand Payouts, Hopper Fills, Short Pays and Accumulated Credit Payouts

Regulatory Compliance Statement - to the extent applicable, the licence holder shall ensure that all manual and system-assisted payouts are processed in a secure, controlled, and verifiable manner.

This includes proper documentation, dual verification, access control, and audit trail maintenance, in accordance with approved internal controls and regulatory requirements.

7.23.1. Document Requirements - all payouts and fills must be recorded using a **three-part form** (or single-sheet if computer-generated), containing:

7.23.1.1. Date and time of transaction

7.23.1.2. Machine number

7.23.1.3. Rand amount (in numbers and words) or prize description and value

7.23.1.4. Game outcome (for handwritten payouts - e.g., reel symbols, card values)

7.23.1.5. Type of payout (e.g., progressive, jackpot, credit win, short pay, special pay, hopper fill)

7.23.1.6. Names and signatures of all verifying and witnessing personnel

7.23.1.7. Customer signature: for jackpots and credit wins, also include name and address

7.23.1.8. Sequential number on all copies of the form (pre-printed or system-generated).

7.23.2. Digital Recordkeeping

7.23.2.1. Computer-generated forms must be stored electronically for at least 5 years or such other period the Boar may determine, and accessible only to authorized personnel with no incompatible functions.

7.23.2.2. System-generated documentation must include:

7.23.2.2.1. Exception logs (e.g., corrections, voids).

7.23.2.2.2. Personnel access list, employee name, ECGB registration number, authorized functions.

7.23.3. Short Pays and Accumulated Credit Payouts use the same payout form as above.

7.23.4. For short pays, value paid must be recorded in the machine entry log and authorizing personnel must sign the log and include their name.

7.23.5. System Controls & Security

7.23.5.1. Computerised jackpot and fill systems must:

7.23.5.1.1. Prevent unauthorized access.

7.23.5.1.2. Require supervisory authorization for all corrections.

7.23.5.1.3. Include password and or other approved authentications, and physical controls in internal controls approved by the Board.

7.23.5.2. Documentation routing must prevent:

7.23.5.2.1. Fraudulent payouts.

7.23.5.2.2. Forged signatures.

7.23.5.2.3. Post-payout alterations.

7.23.6. Controlled Stationery and Digital Media

7.23.6.1. All forms/slips used must be:

7.23.6.1.1. Secured and controlled.

7.23.6.1.2. In triplicate with matching sequential numbers

7.23.6.1.3. Accounted for by the accounting department, which must investigate missing or altered forms

7.23.6.2. For computerised systems:

7.23.6.2.1. Restricted copies must be stored in secure digital media.

7.23.6.2.2. Verified by the accounting department.

7.23.6.2.3. Payout personnel must not have access to this stored data.

7.24. Promotional Payouts and Awards

Regulatory Compliance Statement - the licence holder shall ensure that all promotional payouts and awards are issued in a transparent, controlled, and auditable manner. All such activities must be governed by documented procedures aligned with Regulation 89, with appropriate authorisation, verification, and record-keeping to support regulatory compliance and uphold the integrity of gambling operations and promote responsible gambling.

7.24.1. Definition

Promotional payouts and awards refer to supplemental rewards not reflected in the gambling machine's pay table. These may include cash bonuses, prize giveaways, digital credits, special promotions (e.g., double jackpots, themed bonuses). These must be clearly distinguished from standard machine payouts and comply with Regulation 89.

7.24.2. Document Requirements - each promotional payout or award must be recorded using a multi-part form or computer-generated document, containing:

- 7.24.2.1. Date and time of the transaction.
- 7.24.2.2. Machine number and denomination.
- 7.24.2.3. Rand amount (in numbers and words) or prize description and value.
- 7.24.2.4. Type of promotion (e.g., double jackpots, four-of-a-kind bonus)
- 7.24.2.5. Name and signature of a gambling machine department supervisor and at least one other employee authorizing and completing the transaction
- 7.24.2.6. Customer details, such as name, address, and signature.

7.24.3. Regulatory Alignment (Regulation 89) - all promotional payouts and awards must:

- 7.24.3.1. Be truthful, responsible, and non-misleading.
- 7.24.3.2. Avoid targeting minors or vulnerable individuals.
- 7.24.3.3. Include responsible gambling messaging.
- 7.24.3.4. Not imply gambling as a solution to financial problems or a guaranteed path to success.

7.24.4. Internal Control Submission - all procedures for authorising promotional hand pays and awards must:

- 7.24.4.1. Documented in the licence holder's internal controls
- 7.24.4.2. Submitted to the Board for approval shall include:
 - 7.24.4.2.1. Approval hierarchies.
 - 7.24.4.2.2. System access controls.
 - 7.24.4.2.3. Audit trail requirements.
 - 7.24.4.2.4. Surveillance coverage.
 - 7.24.4.2.5. Alignment with Regulation 89.

7.25. Gambling Machine Department Funds

Regulatory Compliance Statement - the licence holder shall ensure that all gambling machine department funds are managed in a secure, accountable, and auditable manner. This includes accurate reconciliation at shift changes, proper documentation of all fund movements, secure storage or system access, and appropriate supervisory oversight. Controls shall be proportionate to the size and operational model of the casino and shall support full compliance with applicable regulatory requirements.

- 7.25.1. **Shift-End Reconciliation** - imprest gambling machine booths and change banks must be:
- 7.25.1.1. Counted down at the end of each shift by both outgoing and incoming personnel.
 - 7.25.1.2. Reconciled using approved documentation.
 - 7.25.1.3. Signed by both employees to ensure accountability.
- In cashless environments, this may refer to digital float balances and system-based reconciliations, with audit trails and dual verification.*
- 7.25.2. **Float Returns** - if no incoming employee is available:
- 7.25.2.1. Cashier float returns must be returned to the vault.
 - 7.25.2.2. A departmental supervisor must verify the count and co-sign the documentation with the outgoing employee.
- 7.25.3. **Documentation Handling** - all booth and change bank documentation must be:
- 7.25.3.1. Forwarded directly to the accounting department for verification.
 - 7.25.3.2. Or placed in a secured location accessible only to accounting personnel
- 7.25.4. **Transfers of Value** - a record must be maintained for all transfers of value from gambling machine booths. Both the booth cashier and the recipient cashier must:
- 7.25.4.1. Sign the transfer documentation.
 - 7.25.4.2. Include their names under their signatures.
- 7.25.5. **Shortage Tracking** - all cashier shortages must be recorded, investigated by the accounting department, and included in variance reports and reconciliations.

7.26. EPROM Control

Regulatory Compliance Statement - the licence holder shall ensure that all EPROMs are received, stored, installed, and managed under strict technical and procedural controls. This includes verified installation, dual custody storage, comprehensive register maintenance, secure electronic handling, and defined protocols for promotional and competition EPROMs. All procedures shall be documented, Board-approved, and aligned with regulatory requirements to ensure integrity, traceability, and compliance.

- 7.26.1. **Receipt and Installation** - upon receipt and installation of EPROMs from the manufacturer:
- 7.26.1.1. The following must be verified:
 - 7.26.1.1.1. Master program number.
 - 7.26.1.1.2. Par percentage.
 - 7.26.1.1.3. Pay table
 - 7.26.1.2. Verification must be conducted against the manufacturer's specification sheet and Board approval number.
 - 7.26.1.3. This task must be performed by the **Technical Manager or Supervisor and Board Official**.
- 7.26.2. **Storage and Dual Control** - all **registered copies** of percentage, game, or personality EPROMs held on the premises must be:
- 7.26.2.1. Stored under **dual control**.
 - 7.26.2.2. Managed by **two persons from different departments**, one of whom must be from **Security**.
- 7.26.3. Master EPROM Register - a register must be maintained for all master EPROMs, including:
- 7.26.3.1. EPROM number.
 - 7.26.3.2. Board approval number.
 - 7.26.3.3. Manufacturer.
 - 7.26.3.4. Date of par verification, with **signatures and names** of all persons present.
 - 7.26.3.5. Reason for removal from secured area, with **authorizing signatures and names**.
 - 7.26.3.6. Date of destruction, reason, and **signatures of those involved**.
 - 7.26.3.7. **Kobetron signature number** (or equivalent verification tool).
- 7.26.4. **Electronic Storage and Sealing Procedures** - procedures for electronic storage, copying of EPROMs, and sealing EPROMs into machines, must be documented in the licence holder's internal controls and approved by the Board
- 7.26.5. **Promotional and Competition EPROMs** - Procedures for the control of promotional and competition EPROMs must be clearly defined, included in the internal controls, and submitted to the Board for approval.

7.27. Theoretical and Actual Hold

Regulatory Compliance Statement - the licence holder shall ensure that theoretical and actual hold data for all gambling machines is accurately maintained, regularly reviewed, and reconciled in accordance with approved internal controls. All changes, variances, and statistical records must be properly documented, system-supported, and subject to oversight to ensure transparency, performance integrity, and regulatory compliance.

7.27.1. Definitions

- 7.27.1.1. **Actual Hold:** The total Rand value retained by a gambling device divided by the total Rand value played into the device, expressed as a percentage.
- 7.27.1.2. **Floor Par:** The weighted average of theoretical hold percentages across all machines within a denomination, based on coin-in contribution.

7.27.2. Theoretical Hold Records

- 7.27.2.1. Maintain **accurate and current theoretical hold worksheets** for each gambling machine on the floor or in inventory, if provided by the manufacturer.
- 7.27.2.2. Theoretical hold percentages used in analysis must be **within manufacturer tolerance and be approved by the Board.**
- 7.27.2.3. **Discrepancies** must be **investigated immediately, documented** and retained for Board inspection.

7.27.3. Machine Change Tracking - Maintain records for each machine reflecting:

- 7.27.3.1. Date and type of changes made.
- 7.27.3.2. Recalculated theoretical hold (unless retained by the MSC).
- 7.27.3.3. Dates of placement into service, removal from operation, and reinstatement.
- 7.27.3.4. Any changes in machine numbers or designations.
- 7.27.3.5. **Asset numbers must remain constant** throughout ownership.

7.27.4. Meter Requirements - each gambling machine must contain functioning meters for:

- 7.27.4.1. Drop (cash box).
- 7.27.4.2. Jackpot/Credit Win (hand pay meter).
- 7.27.4.3. Games Played (hand pull meter).
- 7.27.4.4. Bill Movement Meter

7.27.5. Meter Reading and Validation

- 7.27.5.1. If **manual readings** are taken: a representative from **Accounting** must record the readings.

- 7.27.5.2. If a **computerised system** is in place:
 - 7.27.5.2.1. Meters may be **downloaded automatically** during machine clearance.
 - 7.27.5.2.2. **Tolerance levels** may be pre-set to flag exceptions
- 7.27.5.3. Upon receipt of meter summaries:
 - 7.27.5.3.1. **Accounting** must review readings for **reasonableness**.
 - 7.27.5.3.2. **Unusual readings** must be:
 - 7.27.5.3.2.1. Reviewed with gambling machine department.
 - 7.27.5.3.2.2. Documented and corrected.
 - 7.27.5.3.2.3. Follow-up actions retained with monthly reports.

7.27.6. Statistical Reporting

- 7.27.6.1. Monthly reports must show:
 - 7.27.6.1.1. Month-to-date, year-to-date, and if practical, life-to-date actual hold percentages.
 - 7.27.6.1.2. Comparison to each machine's theoretical hold percentage.
- 7.27.6.2. Each change in theoretical hold must result in the machine being treated as a new statistical unit.
- 7.27.6.3. Promotional payouts must be included in a way that does not distort actual hold percentages

7.27.7. Monthly reports must also show **year-to-date combined performance by denomination**, including:

- 7.27.7.1. Floor Par.
- 7.27.7.2. Combined Actual Hold %.
- 7.27.7.3. Percentage Variance (Actual - Theoretical).
- 7.27.7.4. **Projected Rand Variance (Coin-in × % Variance)**.

7.27.8. Review and Oversight

- 7.27.8.1. Gambling machine department and relevant management must review statistical reports monthly.
- 7.27.8.2. Large variances must be investigated, resolved, and documented.

7.27.9. System Maintenance

- 7.27.9.1. The IT/ICT department must maintain all gambling machine accounting and monitoring system data files.
- 7.27.9.2. Updates to reflect additions, deletions, or movements of machines must be made at the time of change to ensure report accuracy.

7.28. Currency Acceptor Keys

Regulatory Compliance Statement - the licence holder shall ensure that all currency acceptor keys are controlled, issued, and accessed under strict security protocols. This includes multi-person verification, surveillance oversight, detailed logging, and segregation of duties. All procedures must be documented, Board-approved, and designed to prevent unauthorized access, ensure accountability, and maintain the integrity of drop and count operations.

7.28.1. Drop Box Release Keys

- 7.28.1.1. Access is restricted to **authorized employees**, including at least **one from the Security or Surveillance department**.
- 7.28.1.2. For **unscheduled removals**:
 - 7.28.1.2.1. **Surveillance must be notified.**
 - 7.28.1.2.2. the entire process must be **observed and recorded**.
- 7.28.1.3. At least **two additional employees** must be present during key checkout.
- 7.28.1.4. The **reason for access** outside scheduled times must be **logged**.
- 7.28.1.5. **Release keys** must be stored **separately** from **contents keys**.
- 7.28.1.6. Employees removing drop boxes must **not have access** to contents keys.

7.28.2. Storage Rack/Trolleys Keys

- 7.28.2.1. During count operations at least **three count team members** must be present when keys are issued.
- 7.28.2.2. At other times:
 - 7.28.2.2.1. A Security/Surveillance representative and two authorized persons must accompany the keys.
 - 7.28.2.2.2. Surveillance must monitor and record the placement of full drop boxes into storage racks.

7.28.3. Contents Keys

- 7.28.3.1. Access to currency acceptor contents requires:
 - 7.28.3.1.1. At least three individuals from separate departments.
 - 7.28.3.1.2. One must be from Security/Surveillance

- 7.28.3.2. For unscheduled access - surveillance must be notified and record the process.
- 7.28.3.3. During key access - a management representative, a Security/Cash Desk representative, and one other authorized employee must be present.
- 7.28.3.4. The reason for access must be recorded in the key log.

7.28.4. Count Room Keys

- 7.28.4.1. At least three count team members must be present when count room keys are issued.
- 7.28.4.2. Surveillance must be notified immediately each time the count room is accessed .

7.28.5. Duplicate Keys

- 7.28.5.1. Must be stored with the **same level of control** as active keys
- 7.28.5.2. Access requires - at least three individuals from separate departments, including Security/Surveillance.
- 7.28.5.3. Storage location must be under 24-hour video surveillance.
- 7.28.5.4. Surveillance must be automatically notified when duplicate keys are accessed.
- 7.28.5.5. Detailed records must be maintained for:
 - 7.28.5.5.1. Key issuance, duplication, destruction.
 - 7.28.5.5.2. Type, quantity, date, reason, and signatures of all involved
- 7.28.5.6. Authorization and verification must be done by at least two departments, one being Security/Surveillance

7.28.6. Key Control Logs

- 7.28.6.1. Logs must be maintained for:
 - 7.28.6.1.1. Gambling machines drop clearance and cabinet keys.
 - 7.28.6.1.2. Count room keys (hard and currency acceptor).
 - 7.28.6.1.3. Currency acceptors drop box storage rack/trolley keys.
 - 7.28.6.1.4. Currency acceptors drop box release keys.
 - 7.28.6.1.5. Currency acceptor contents keys.
 - 7.28.6.1.6. All **duplicate keys** listed above.
- 7.28.6.2. Each log entry must include:
 - 7.28.6.2.1. Date and time keys are obtained and returned.
 - 7.28.6.2.2. Printed name, signature, and board registration number of:
 - 7.28.6.2.2.1. Custodian releasing the keys.

7.28.6.2.2.2. Person obtaining the keys.

7.28.6.2.2.3. Person returning the keys.

7.28.6.2.2.4. Custodian receiving the keys.

7.28.6.3. Additional Requirements:

7.28.6.3.1. Logs must be stored periodically and accessible to Internal Audit as and when required for review and retention.

7.28.6.3.2. All entries must be made in ink or permanent format.

7.29. Wide Area Progressive Gambling Machines (Inter-Casino Linked Progressives)

Regulatory Compliance Statement - where applicable, the licence holder shall ensure that all wide area progressive gambling systems are operated under secure, auditable, and Board-approved procedures. This includes system access control, payout reconciliation, inter-casino coordination, and ongoing validation to ensure integrity, accuracy, and regulatory compliance. Casinos not operating WAP systems must reflect this in their internal controls.

7.29.1. **System Access Control** - all wide area progressive systems must be **adequately restricted** to prevent unauthorized access, including:

7.29.1.1. Monthly password changes.

7.29.1.2. Restricted access to EPROMs.

7.29.1.3. Controlled physical access to system hardware and interfaces.

7.29.2. **Required Procedures** - Licence holders must develop, implement, and document procedures for:

7.29.2.1. Meter and jackpot payout reconciliation.

7.29.2.2. Collection/drop of gambling machine funds.

7.29.2.3. Jackpot verification, payment, and pro-rata billing to participating casinos.

7.29.2.4. System maintenance protocols.

7.29.2.5. System accuracy validation.

7.29.3. **Internal Control Documentation** - all procedures must be:

7.29.3.1. Documented in the internal control manual.

7.29.3.2. Submitted to the Board for approval.

7.29.3.3. Reviewed periodically to ensure alignment with system changes and regulatory expectations.

7.30. Gambling machine Accounting and Auditing Procedures

Regulatory Compliance Statement - the licence holder shall ensure that all gambling machine accounting and auditing procedures are conducted independently, accurately, and in accordance with approved internal controls. This includes system verification, variance investigation, revenue reconciliation, exception reporting, and documentation, all of which must support transparency, integrity, and compliance with regulatory requirements.

7.30.1. **Independence of Function** - all accounting/auditing procedures must be performed by employees independent of the transactions being reviewed.

7.30.2. System verification - for computerised gambling machine accounting and monitoring systems :

7.30.2.1. Random checks must verify data transmission integrity and accuracy of meter readings in statistical reports.

7.30.3. Variance Investigation - any machine with an unresolved coin variance exceeding **5% or R500** (whichever is lesser) between:

7.30.3.1. Actual drop.

7.30.3.2. Weigh scale reading.

7.30.3.3. Bill-in meter.

7.30.3.4. Soft count.

Must be **investigated**, with findings **documented and retained**.

7.30.4. **Revenue Reconciliation** - Gross Gambling Revenue (GGR) reported in tax returns must be reconciled to the win figures in gambling machine analysis reports by denomination.

7.30.5. **EPROM Change Verification** - at least **quarterly**, accounting/auditing personnel must randomly verify that **EPROM changes** are accurately reflected in analysis reports.

7.30.6. **Exception Report Review** - exception reports from all computerised gambling machine systems must be:

7.30.6.1. **Reviewed regularly** by accounting/auditing employees.

7.30.6.2. **Investigated and resolved** where anomalies are identified.

7.30.7. **Documentation and Board Inspection** - all gambling machine auditing procedures and any follow-up performed shall be documented and maintained for Board inspection.

7.31. Access to Computerised Systems

Regulatory Compliance Statement - the licence holder shall ensure that access to all computerised gambling systems is controlled, documented, and auditable. Access rights must be role-based, independently reviewed, and supported by secure audit trails to maintain system integrity, prevent unauthorized activity, and ensure compliance with regulatory requirements.

7.31.1. **Access Listing requirement** - for all computerised systems used in gambling operations, an **access listing** must be maintained and include the following for each individual with system access:

7.31.1.1. **Full name and job title.**

7.31.1.2. **Board identification number** (or equivalent internal ID).

7.31.1.3. **List of functions** the individual is authorized to perform (or equivalent role-based access descriptors).

7.31.2. **Audit Trail of Access Changes** - an **audit trail** must be maintained for all changes to individual system access, including:

7.31.2.1. Name of the person who performed the change.

7.31.2.2. Name of the individual whose access was modified.

7.31.2.3. Details of access added or removed.

7.31.2.4. Date and time of the change.

7.31.2.5. A computer-generated sequential number for each audit entry.

7.31.2.6. If access rights are amended due to a system upgrade, these changes must also be documented in the audit trail.

7.31.3. **Retention and Inspection** - all access listings and audit trails must be:

7.31.3.1. Securely stored.

7.31.3.2. Retained for Board inspection.

7.31.3.3. Reviewed periodically by internal audit or compliance personnel.

7.32. IT/ICT - General Controls

Regulatory Compliance Statement - the licence holder shall ensure that all IT/ICT systems supporting gambling operations are secured, access-controlled, and independently managed. The IT/ICT department shall operate independently from all gambling functions and be restricted from unauthorized access to gambling areas and live data. All procedures—including system security, access control, backup and recovery, and program change management—must be documented, Board-approved, and designed to uphold system integrity, operational continuity, and regulatory compliance.

- 7.32.1. **System Security** - all main computers (hardware, software, and data files) for gambling departments must be located in **secured areas and** accessible only to **authorized personnel**.
- 7.32.2. Gambling personnel must be **precluded from unrestricted access** to secured computer areas.
- 7.32.3. Secured areas must be under **24-hour digital surveillance**.
- 7.32.4. **System Access Controls** - all systems must be protected using:
 - 7.32.4.1. Passwords or other approved authentication methods.
 - 7.32.4.2. Role-based access control, assigned by management or independent personnel.
- 7.32.5. **Password protocols must include:**
 - 7.32.5.1. Individual passwords per user.
 - 7.32.5.2. Monthly password changes.
 - 7.32.5.3. No reuse of the same password more than once in a 12-month cycle.
- 7.32.6. **Backup and Recovery** - adequate backup and recovery procedures must be in place including :
 - 7.32.6.1. Daily backup of data files.
 - 7.32.6.2. Backup of all programs and configurations.
 - 7.32.6.3. Off-site storage or equivalent secure protection.
 - 7.32.6.4. Quarterly testing of recovery procedures.
- 7.32.7. **System Documentation** - maintain comprehensive documentation including:
 - 7.32.7.1. Hardware and software descriptions.
 - 7.32.7.2. Operator manuals.
 - 7.32.7.3. System architecture and configuration records.

7.33. Information Technology or Information and Communications Technology (IT/ICT) Department

- 7.33.1. **Independence** - the IT/ICT department must be independent of all gambling areas, including, Cage, Pit, and Count Rooms.
- 7.33.2. **Access Restrictions** - the IT/ICT personnel must be restricted from unauthorised access to:
 - 7.33.2.1. Computers and terminals in gambling areas.
 - 7.33.2.2. Source documents.
 - 7.33.2.3. Live data files (excluding test environments).

7.33.3. **Program Change Management** - for inhouse developed systems:

7.33.3.1. Requests for new programs or changes shall follow the change management process detailed in the Board-approved internal controls.

7.33.3.2. **Approvals** must be documented and retained

7.33.3.3. A **written implementation plan** must be maintained, including:

7.33.3.3.1. Date of deployment

7.33.3.3.2. Nature of change

7.33.3.3.3. Conversion or installation procedures

7.33.3.3.4. Assigned personnel.

7.33.4. **Board Approval** - is required prior to implementing any new or modified programs.

7.33.5. **Security Log Review** - if system-generated logs are available, IT/ICT personnel with authority or under supervision must review for:

7.33.5.1. Multiple failed login attempts.

7.33.5.2. Changes to live data files.

7.33.5.3. Unusual transactions or access patterns.

7.33.6. **Modem Access Controls** - if remote dial-up access is permitted for software support, the licence holder must maintain a detailed access log, including:

7.33.6.1. Name of authorizing person.

7.33.6.2. Name of programmer or manufacturer's representative.

7.33.6.3. Manufacturer's name (if applicable).

7.33.6.4. Reason for access.

7.33.6.5. Description of work performed.

7.33.6.6. Date, time, and duration of access.

7.34. Casino Accounting Department

Regulatory Compliance Statement - the licence holder shall ensure that the casino accounting department operates independently and maintains full control over financial integrity, secured stationery, and system access. Through daily verification, reconciliation, and oversight, the department shall uphold transparency, accuracy, and compliance in all accounting functions related to gambling operations.

- 7.34.1. **Internal Control Procedures** - Controls governing the day-to-day operations of the casino accounting department shall be clearly defined in the licence holder's internal control procedures manual, which must be submitted to the Board for approval.
- 7.34.2. **Departmental Independence** - the casino accounting department shall function independently from all gambling departments to ensure objective financial oversight and prevent conflicts of interest.
- 7.34.3. **Secured Stationery Controls** - the department shall be responsible for the control and security of all controlled or secured stationery, ensuring that:
- 7.34.3.1. Such stationery is procured only from Board-approved suppliers holding a valid certificate of suitability.
 - 7.34.3.2. Secured stationery is checked daily for completeness.
 - 7.34.3.3. All copies of secured stationery are accounted for.
 - 7.34.3.4. No unauthorized alterations are made to secured stationery.
 - 7.34.3.5. Secured stationery is used in strict numerical sequence.
- 7.34.4. **Identification of Secured Stationery** - The internal control procedures must identify all forms of secured stationery and specify the control measures applicable to each, subject to Board approval.
- 7.34.5. **Daily Count Verification** - A designated member of the department shall verify and attest to the accuracy of both hard and soft count results on a daily basis.
- 7.34.6. **System Access Oversight** - The casino controller shall ensure that access to the casino management system is restricted to authorized personnel only and that such access does not compromise the minimum internal control requirements.
- 7.34.7. **Accounting Responsibilities** - The department shall perform all routine accounting functions related to the gambling departments, including the cage and vault operations.
- 7.34.8. **Journal Entry Authorization and Reconciliation** - The casino controller shall authorize all journal entries and ensure that revenues, expenses, assets, and liabilities are reconciled to the general ledger on a monthly basis.
- 7.34.9. **Cage and Vault Audits** - The cage and vault operations shall be audited at least monthly by a member of the casino accounting department, with all variances reported to the casino controller for review and resolution.

7.35. Internal Audit Department

Regulatory Compliance Statement - the licence holder shall ensure that internal audit functions are structured to provide independent, risk-based assurance over gambling operations. Whether performed in-house, at group level, or through approved shared services, internal audit must support regulatory compliance, operational integrity, and continuous improvement. Operational audits conducted by Surveillance Audit or Compliance units shall supplement internal audit efforts and reinforce accountability at the unit level.

7.35.1. **Board-Supplemented Guidance** - The Board may issue checklists, programs, and guidelines to supplement these Rules and promote consistency in internal audit practices.

7.35.2. **Covert Observations** - Internal audit observations shall, where feasible, be conducted covertly to ensure authentic assessment of operational practices.

7.35.3. **Audit Function Structure**

7.35.3.1. All casino licence holders shall maintain an internal audit function that is independent of the departments it audits. This function may be:

7.35.3.1.1. Maintained as a separate internal audit department within the licence holder; or

7.35.3.1.2. Outsourced or performed at group/holding company level, subject to prior written approval by the Board.

7.35.4. **Audit Documentation** - All internal audit work must be supported by documentation (e.g., checklists, programs, reports) that evidences the scope, methodology, findings, and conclusions.

7.35.5. **Reporting Structure** - Internal audit results shall be reported to the board of directors, executive management, or ownership personnel who are independent of the departments under audit.

7.35.6. **Regulatory Reporting** - Copies of internal audit reports must be submitted to the Board for oversight and regulatory review.

7.35.7. **Exception Handling** - All material exceptions identified through internal audit must be investigated and resolved, with outcomes documented and retained for a minimum of five years.

7.35.8. **Annual Audit Coverage** - Internal audit must assess compliance with minimum internal control standards across the following areas, based on the licence holder's financial year-end:

7.35.8.1. Table games.

7.35.8.2. Gambling machines.

7.35.8.3. Cage and credit procedures.

7.35.8.4. Cage and vault accountability.

- 7.35.8.5. IT/ICT functions.
- 7.35.8.6. Adjusted or Gross Gaming Revenue Reconciliation to Board tax returns
- 7.35.9. **Surprise Testing** - the following areas must be reviewed or tested at least once per quarter:
 - 7.35.9.1. Table games: fills, credits, pit credit play, soft drop/count, currency counters, key control, source document tracing, and reconciliation.
 - 7.35.9.2. Gambling machines: jackpots, fills, drops, weigh scales, count room counters, EPROM compliance, and key control.
 - 7.35.9.3. Cage and credit procedures and trial balance reconciliations.
 - 7.35.9.4. Cage and vault reconciliation to general ledger e
 - 7.35.9.5. IT/ICT: compliance with approved controls f) Gross revenue: reconciliation to tax returns
- 7.35.10. **Balance Sheet Review** - at least every six months, all casino-related balance sheet accounts must be reviewed by the internal audit function and submitted to the Board.

7.36. Retention of Unclaimed Monies

Regulatory Compliance Statement - the licence holder shall ensure that all unclaimed prize monies are securely recorded, access-controlled, and retained for the period prescribed by the Board. Thereafter, such funds must be recognised as revenue for tax purposes. These procedures shall promote transparency, regulatory compliance, and the integrity of prize disbursement processes.

- 7.36.1. **Register of Unclaimed Prizes** - The licence holder shall maintain a register or system-generated report of all prize monies not claimed by the end of the shift during which the win occurred.
- 7.36.2. **Access Control** - Access to unclaimed prize money records shall be restricted to authorised personnel only, with appropriate system or physical controls in place.
- 7.36.3. **Regulatory Reporting** - The licence holder shall provide the Board with sufficient records and supporting information to enable the identification, tracking, and verification of unclaimed prize amounts.
- 7.36.4. **Tax Treatment** - All unclaimed prizes shall be retained for the period prescribed by the Board. Upon expiry of this period, such amounts shall be recognised as revenue and included in the calculation of Adjusted or Gross Gambling Revenue (GGR) for tax purposes.
- 7.36.5. **Procedures for Minors and Claims** - The licence holder shall submit procedures for handling prizes won by minors and the collection of unclaimed prizes to the Board for approval. These procedures must ensure compliance with applicable laws and protect the integrity of the prize payout process.

PART H: MANUFACTURERS, DISTRIBUTORS, SUPPLY AND MAINTENANCE OF GAMBLING AND ASSOCIATED DEVICES

8. Overarching Policy Compliance Statement

The licence holder, manufacturers, and suppliers shall ensure that all gambling and associated devices are designed, distributed, and maintained in accordance with approved technical standards and regulatory requirements. All devices must be certified, traceable, and supported by accountable personnel to uphold the integrity, safety, and compliance of gambling operations in the Province.

8.1. Definitions

In this Part, terms shall have the meanings assigned in the Act, Regulations, and these Rules. Unless the context indicates otherwise:

- 8.1.1. **Conversion:** A change in a gambling machine from one pre-approved configuration or mode of play to another.
- 8.1.2. **Denomination of a Machine:** The lowest credit value configured on the gambling machine.
- 8.1.3. **Game Outcome:** The final result of a wager.
- 8.1.4. **Manufacturer:** A person or entity that manufactures, assembles, produces, programs, or modifies gambling equipment for use within or outside the Province.
- 8.1.5. **Modification:** A change in an approved gambling machine that affects its mode or manner of play, including changes to control or graphics programs and theoretical hold percentage, excluding:
 - 8.1.5.1. A conversion.
 - 8.1.5.2. Replacement with pre-approved components.
 - 8.1.5.3. Rebuilding with pre-approved components.
 - 8.1.5.4. Changes in theoretical hold that meet prescribed requirements.
 - 8.1.5.5. Changes due to top award or bonus jackpots paid manually and not accounted for by the device.
- 8.1.6. **Promotional Machine:** A device resembling a gaming machine that:
 - 8.1.6.1. Is playable without a wager; or
 - 8.1.6.2. Always pays out an amount equal to or greater than the wager.
- 8.1.7. **Supplier:** A person or entity that sells, leases, markets, or distributes gambling devices for use in the Province or from within the Province, excluding route operators distributing to their own sites.

8.2. Employment of Individual to Respond to Board Inquiries

- 8.2.1. Each manufacturer and supplier of gambling or associated devices shall employ or retain a technically competent individual who understands the design and function of their devices and can respond to Board inquiries within the timeframe specified by the Chief Executive Officer.
- 8.2.2. By 31 December each year, manufacturers and suppliers must submit the name and contact details of the designated individual to the Board and notify the Board in writing of any changes within 15 days.

8.3. Approval of Gambling Devices: Applications and Procedures

- 8.3.1. No manufacturer or supplier may distribute, and no licence holder may offer, gambling devices for play in the Province unless the device:
 - 8.3.1.1. Has been certified by the SABS or an equivalent approved laboratory as compliant with SANS1718; and Has been approved by the Board.
- 8.3.2. Applications for approval must be submitted using prescribed forms and include a complete, technically accurate description of the device in both technical and layman's terms, signed under penalty of perjury.
- 8.3.3. The CEO shall consider whether the approval of a new gambling device aligns with the public policy of the Province.
- 8.3.4. Approval of a gambling device does not constitute certification of its safety.

8.4. Minimum Standards for Gambling Devices

- 8.4.1. All gambling devices submitted for approval must be certified as meeting the requirements of SANS1718.
- 8.4.2. All costs associated with the certification and approval process shall be borne by the applicant submitting the gambling device.

8.5. Rules for Gambling Devices

Regulatory Compliance Statement - the licence holder shall ensure that all gambling devices offered for play are configured, operated, and modified in a secure, auditable, and compliant manner. All changes to game configurations, chip sets, or payback percentages must be controlled, recorded, and approved to preserve fairness, transparency, and regulatory integrity.

- 8.5.1. **Applicability** - this Rule applies to all gambling devices offered for play in the Province. In the event of any conflict with SABS requirements, the SABS standards shall prevail.
- 8.5.2. **Fixed Payback Configuration** -the theoretical payback percentage of a game using a single chip set must not be alterable without physically replacing the chip set.
- 8.5.3. **Change Recording Requirements** - when a chip set change occurs, the following must be recorded:
- 8.5.3.1. Name of the person effecting the change.
 - 8.5.3.2. Closing soft meters (and hard meters, if fitted).
 - 8.5.3.3. Details of the change, including chip identification and Kobetron numbers.
- 8.5.4. **Multi-Game Chip Set Approval** - All game names, RTPs, and bet size combinations on a multi-game chip set must be approved by the Board.
- 8.5.5. **Game Selection Variability** - approved game, RTP, and bet size combinations may be varied manually or via the CMCS.
- 8.5.6. **Recording of Multi-Game Changes** - when changes are made under sub-rule (4), the CMCS must record:
- 8.5.6.1. Name of the person effecting the change.
 - 8.5.6.2. Closing soft meters of the games being replaced.
- 8.5.7. **Frequency of Payback Changes** - Payback percentage changes may not occur more than once per calendar month.
- 8.5.8. **Timing of Changes** - No changes may be made while the machine is available for play.
- 8.5.9. **Exclusions from Payback Changes** - The addition of attendant-paid bonuses, progressive jackpots, or changes in jackpot progression rates are not considered changes to the theoretical payback percentage.
- 8.5.10. **Metering Requirements** - All gambling machines must:
- 8.5.10.1. Accumulate “in”, “out”, “drop”, and “handpay” values in units equal to the denomination or Rand value.
 - 8.5.10.2. Provide on-demand display of stored information.
- 8.5.11. **Note Acceptor Meter** - Gambling machines with note acceptors must include a meter that records the total value of notes accepted.
- 8.5.12. **Meter Accumulation**
- 8.5.12.1. “In” meters: All coin and credit wagers.
 - 8.5.12.2. “Out” meters: All payouts for winning combinations.
 - 8.5.12.3. “Drop” meters: Value of coins or notes diverted into the drop box.

8.5.12.4. “Handpay” meters: All hand-paid amounts.

8.5.13. **Digital Meter Specifications** - Machines must include:

8.5.13.1. Digital meters (minimum 6 digits) recording plays since power-on and door closure.

8.5.13.2. Meters must freeze at maximum value until reset by the appropriate event.

8.5.14. **On-Demand Display** - Machines must provide the means to display stored meter data on demand.

8.5.15. **Hard Meter Labelling** - all hard meters must be permanently labelled to indicate whether they count in units or value.

8.5.16. **Approval of Chip and Game Changes** - all chip set and game changes must be submitted to and approved by the Board.

8.6. Double Up and Gamble Features - Double up and gamble features are strictly prohibited on limited gambling machines in the Province.

8.7. Modifications and Conversions - Applications and Procedures

All modifications and conversions to gambling devices must be performed only by registered and authorised persons, with prior Board approval. These controls ensure that all changes are traceable, technically sound, and compliant with regulatory and technical standards.

8.7.1. Modifications to gambling devices or restricted amusement machines may only be undertaken:

8.7.1.1. By persons registered in terms of section 61 of the Act;

8.7.1.2. Following a formal application to the Board; and

8.7.1.3. Upon written approval from the CEO.

8.7.2. Applications must include:

8.7.2.1. A complete, technically accurate description of the modification in both technical and layman’s terms, signed under penalty of perjury.

8.7.2.2. A declaration under penalty of perjury that the modified device has been certified by the SABS as compliant with SANS1718.

8.8. Conversions

8.8.1. Conversions of gambling or amusement machines may only be performed by:

8.8.1.1. Registered manufacturers; or

8.8.1.2. Persons registered to perform maintenance on gambling machines.

- 8.8.2. All conversions must be fully documented, with complete and accurate records maintained by the person or entity performing the conversion.

8.9. Maintenance of Gambling Machines

Regulatory Compliance Statement - the licence holder shall ensure that all gambling machines are maintained in a secure, compliant, and operational condition. Only authorised and registered personnel may perform maintenance or repairs, and all interventions affecting game outcomes must be documented and traceable to uphold the integrity of gambling operations.

- 8.9.1. **Authorised Maintenance Only** - A licence holder shall not alter the operation of approved gambling machines and may only permit maintenance by persons registered or authorised by the Board.
- 8.9.2. **Operational Condition** - Gambling machines offered for public play must be maintained in a suitable and functional condition at all times.
- 8.9.3. **Restrictions on Game Outcome Changes** - No person may make changes or repairs to any part of a gambling machine that affects the game outcome unless specifically authorised by the Board.
- 8.9.4. **Repair Records** - Each licence holder shall maintain a written record of all repairs involving the replacement of parts that affect the game outcome. This record must include:
- 8.9.4.1. The name of the person performing the repair;
 - 8.9.4.2. A description of the repair; and
 - 8.9.4.3. Be made available for audit and/or inspection by the Board.

8.10. Duplication of Program Storage Media

The duplication of gambling machine program storage media shall be strictly controlled and limited to authorised entities. All duplication procedures must be documented in the internal control manual and approved by the Board to ensure system integrity and prevent unauthorised replication.

- 8.10.1. **Authorised Entities** - only the following may duplicate the contents of a gambling machine's program storage medium:
- 8.10.1.1. A registered manufacturer.
 - 8.10.1.2. A casino licence holder.
 - 8.10.1.3. The Board; or
 - 8.10.1.4. The SABS.
- 8.10.2. **Internal Control Procedures** - the procedure for duplication must be documented in the licence holder's internal control manual and approved by the Board.

8.11. Records for Distribution of Gambling Devices

Regulatory Compliance Statement - Manufacturers, distributors, and licence holders shall maintain complete and verifiable records for all gambling device distributions. These records ensure traceability, prevent unauthorised possession, and support regulatory oversight across jurisdictions.

8.11.1. **Record-Keeping Requirements** - Manufacturers and distributors must maintain detailed records for all gambling devices, device parts, or amusement machines distributed within or outside the Province. Records must include:

- 8.11.1.1. Full name, province of residence, physical address, telephone number, ID/passport number (or birth date if unavailable) of both the purchaser and recipient (if not licensed/registered).
- 8.11.1.2. Name and addresses of the purchaser or recipient (if licensed/registered);
- 8.11.1.3. Destination, including port of exit if outside South Africa.
- 8.11.1.4. Number of items shipped.
- 8.11.1.5. Model number, game type, EPROM number(s), and year of manufacture (if known).
- 8.11.1.6. Denomination of each machine or device.
- 8.11.1.7. Serial number of each machine or device.
- 8.11.1.8. Registration numbers (if applicable).
- 8.11.1.9. Expected date and time of shipment.
- 8.11.1.10. Method of shipment and carrier details.
- 8.11.1.11. Seal number(s) of shipping containers or such other mode of shipping used.
- 8.11.1.12. Certified copy of the recipient's valid licence/registration or, where not required, a sworn statement confirming lawful use, with supporting documentation.

8.11.2. **Prohibition on Unauthorised Supply** - Gambling devices, parts, or amusement machines may not be supplied to:

- 8.11.2.1. Persons not licensed or authorised to possess such equipment; or
- 8.11.2.2. Destinations where possession of such equipment is unlawful.

8.12. Control of Gambling Machines and Associated Devices

Regulatory Compliance Statement - All manufacturers, distributors, and licence holders must ensure that gambling machines and associated devices are **properly marked, registered, distributed, installed, modified, and disposed of** in strict compliance with Board requirements. These controls are essential to: **Ensure traceability** of devices; **Prevent unauthorised use or diversion**; **Maintain**

regulatory oversight and integrity of gambling operations. Full and accurate records must be maintained and made available to the Board upon request. Prior written approval is required for any installation, modification, or disposal of devices, unless otherwise exempted.

8.12.1. **Marking, Registration, and Distribution of Gambling Machines**

8.12.1.1. Except as otherwise provided in sub-rule (2), a manufacturer or distributor shall not distribute a gambling machine in the Province or from a location within the Province out of the Province unless the gambling machine has:

8.12.1.1.1. the machine's unique serial number, permanently stamped or engraved in lettering no smaller than 5 millimetres on the metal frame or other permanent component of the machine and on a removable plate attached to the cabinet of the machine which will allow easy review by a board official without the opening of any part of the machine; and

8.12.1.1.2. in the case of machines distributed in the Province, the board approval number or, if the machine has been modified since initial approval of the machine, the board approval certificate or copy of the modification authorisation should be kept at a place where it is readily available.

8.12.1.2. Each manufacturer or distributor shall keep a written list of:

8.12.1.2.1. the date of each delivery and receipt of gambling machines.

8.12.1.2.2. the container(s) seal number(s).

8.12.1.2.3. the serial numbers of the machines.

8.12.1.2.4. the board approval number, or if the machine has been modified since initial approval of the machine, the modification approval number; and

8.12.1.2.5. the name, Province of residence, addresses and telephone numbers of the person to whom the gambling machines have been distributed and shall provide such list to the chief executive officer or an inspector of the board immediately upon request.

8.12.2. Approval to Sell or Dispose of Gambling Devices

- 8.12.2.1. A licence holder shall not dispose of gambling devices or gambling device parts without the prior written approval of the board: *Provided that if the gambling device or part is sold or delivered to such licence holder's affiliated companies or to a registered manufacturer or distributor within the Province, approval is deemed to have been granted if the details of the gambling devices or parts being shipped are given to the board in advance and the shipment is verified by the board.*
- 8.12.2.2. Applications for approval to sell or otherwise transfer or dispose of gambling machines must be made, processed, and determined in such manner and using such forms as the chief executive officer may prescribe.
- 8.12.2.3. Each application must include items or information as the board may require.

8.12.3. Installation of Associated Devices

- 8.12.3.1. The board will maintain a list of associated devices.
- 8.12.3.2. A licence holder shall not install or use associated devices without prior written approval of the CEO.
- 8.12.3.3. Applications for approval to install or use associated devices shall be made and processed in such manner and using such forms as may be prescribed or determined by the board.
- 8.12.3.4. The CEO may consider the approval of associated devices by other gambling regulatory jurisdictions in his determination of the approval.

8.12.4. **Maintenance of Associated Devices** - A licence holder shall not alter the manner in which associated devices operate without prior written approval of the chief executive officer.

8.12.5. EPROM Seal Break

- 8.12.5.1. Where it is necessary to access the logic area or remove the EPROM of a gambling machine in a casino, the following procedure shall apply unless an inspector of the Board is present.
- 8.12.5.2. Before such logic area is accessed, the licensee shall complete the first two parts of an EPROM seal break form and **notify the Board in writing or electronically (email or portal)**. Where immediate written notification is impractical, **interim permission may be obtained from a Board representative**.
- 8.12.5.3. An EPROM seal break form shall consist of three parts, completed as follows:

- 8.12.5.3.1. The first part shall be completed and signed by the slots technical department and authorised by: **a slots manager, gaming manager, gaming floor manager, or slots shift manager**; and the technical manager or senior technician.
- 8.12.5.3.2. The second part shall be completed and signed by the gaming security supervisor or duty manager.
- 8.12.5.3.3. The third part must be completed by the surveillance department after completion of the procedure.
- 8.12.5.4. Prior to breaking the logic area seal, the gaming security duty manager shall inform the surveillance department of the intended seal break.
- 8.12.5.5. After removal of the MPU board, it shall be taken to the slots technical workshop escorted by a security member or worked on under camera coverage on the casino floor.
- 8.12.5.6. EPROM seal tape and EPROMs may only be removed under camera coverage, monitored by the surveillance department.
- 8.12.5.7. All surveillance recordings of the removal, replacement, and work on the MPU board must be retained until the Board authorises disposal.
- 8.12.5.8. Once resealed, the logic door must not be reopened unless a Board inspector is present.
- 8.12.5.9. Where the logic area was accessed without a Board inspector, a sticker must be placed on the logic door indicating no further access is permitted.
- 8.12.5.10. The original seal break form must be kept in the machine file in the slots department.

8.13. Approval of Promotional Tournament Machines: Applications and Procedures

- 8.13.1. A manufacturer or distributor shall not distribute a promotional machine for use in the Province, and a licensee shall not offer a promotional machine for play to the public unless the promotional machine has been approved by the Board.
- 8.13.2. The provisions governing the approval, distribution into and out of the Province, modification, and conversion of gaming machines shall apply *mutatis mutandis* to promotional machines.

8.14. Approval of Games: Applications and Procedures

- 8.14.1. A licensee shall not offer a casino game played on a gaming machine for play unless such game has been certified as conforming to the standard set by the SABS and approved by the Board: *Provided that the Board may, at its discretion, give temporary approval for the operation of such a game, subject to certification in terms of the SABS standard and any other conditions as determined by the Board.*
- 8.14.2. Applications for approval of a game referred to in sub-rule (1) shall be made and processed in such manner and using such forms as may be approved by the Board and shall include:
- 8.14.2.1. A description of the game, including the **Rules of play**.
 - 8.14.2.2. The **proposed schedule of payouts**.
 - 8.14.2.3. A **statistical evaluation** of the theoretical percentages of the game.

PART I: CHIPS, TOKENS, PLAQUES, DICE, CARDS, ROULETTE WHEELS AND BALLS

9. Overarching Policy Compliance Statement

The licence holder, manufacturers, and suppliers shall ensure that all gambling chips, tokens, plaques, dice, cards, roulette wheels, and balls are designed, issued, and controlled in accordance with approved technical standards and regulatory requirements. All items must be distinct, traceable, and supported by accountable personnel to uphold the integrity, fairness, and compliance of gambling operations in the Province.

9.1. Gambling Chips: Value and Non-Value; Physical Characteristics

Casino licence holders must ensure that **value chips, non-value chips, plaques, and special-use chips** are issued and used in a manner that prevents confusion, fraud, and unauthorised use. Accurate records of chip inventories and movements must be maintained to support regulatory oversight and operational integrity.

9.2. Definitions

In this Part, words and phrases shall have the meaning accorded to them in the Act, Regulations, and Rules and, unless the context otherwise requires:

- 9.2.1. **“non-negotiable chip”** means a gambling chip which cannot be exchanged for cash or other gambling chips and can only be issued to play a gambling game at a casino subject to certain terms and conditions.
- 9.2.2. **“non-value chip”** means a gambling chip which has no face value and is normally associated with the colour chip float on a roulette table and shall include a “wheel check” and a “colour chip”.
- 9.2.3. **“plaque”** means a gambling chip that normally represents the value of a buy-in or is used as part of the float for the table game of punto banco, and shall include the term “jeton”;
- 9.2.4. **“promotional chip”** means a gambling chip which may be used for a specific purpose, a specific promotion or a specific period at a casino, which has a restricted use, issue and negotiability in terms of the conditions in terms of which it is issued.
- 9.2.5. **“special use gaming chip”** means a gambling chip other than a value chip or a non-value chip and includes a “non-negotiable chip” and a “promotional chip”.
- 9.2.6. **“value chip”** means a gambling chip that is accepted within the casino environment as the means by which a wager can be placed, paid out and redeemed and includes “American chip”, “cash chip” and “oversize chip”.

9.3. General Rules

- 9.3.1. Each non-value chip utilised in a casino shall be issued solely for the purpose of gambling at roulette unless otherwise specifically approved by the Board for competition or tournament purposes.
- 9.3.2. No person at a roulette table shall be issued or permitted to gamble with non-value chips that are identical in colour and design to value chips or non-value chips being used by another person at the same table.
- 9.3.3. Each set of non-value gaming chips used on a particular table shall be designed as to be easily distinguishable from all other non-value gambling chips used on that table, on any other gambling table or any other gambling chips used in the casino.
- 9.3.4. Should a non-value gambling chip be issued for play at a value higher than the table minimum, the surveillance department must be informed.
- 9.3.5. When a patron purchases non-value chips, a chip of the same colour shall be placed in a chiptree or other device as approved by the Board, close to the outer rim of the roulette wheel.
- 9.3.6. Non-value chips shall only be presented for redemption at the table from which they were issued and shall not be redeemed or exchanged at any other location in the casino.
- 9.3.7. When non-value chips are presented, the dealer at such table shall exchange them for an equivalent amount of value chips, which will then be used by the patron in gambling or redeemed as any other value chip.
- 9.3.8. Each casino licence holder shall have the discretion to permit or prohibit the use of value chips by persons playing at roulette.
- 9.3.9. It shall be the responsibility of the casino licence holder and its employees to keep accurate account of the wagers being made with value so that the wager made by one player is not confused with those made by another player at the table.
- 9.3.10. Each casino licence holder shall keep a monthly summary of the value chip inventory for each table and design, by colour, which shall include at least, the following:
 - 9.3.10.1. the balance on hand at the beginning of the month.
 - 9.3.10.2. the number of value chips distributed to the gambling tables during the month.
 - 9.3.10.3. the number of value chips returned to inventory during the month.
 - 9.3.10.4. the balance on hand at the end of the month; and
 - 9.3.10.5. documentation as to who is holding these chips (if known).
- 9.3.11. The summary contemplated in sub-rule (11) shall be shown in a format that makes provision for the daily movement.

9.3.12. No casino licence holder or other person licensed by the Board or registered in terms of section 61 of the Act shall manufacture for, sell to, distribute to, or use in any casino outside of the Province, any value or non-value chip having the same design as those approved for use in a casino in the Province.

9.4. Gambling Plaques

Casino licence holders must implement a Board-approved accounting and cage procedure system before issuing gambling plaques. Plaques must align with approved colour schemes to maintain consistency and prevent confusion.

9.4.1. No gambling plaque shall be issued until the casino licence holder has submitted to the Board and the Board has approved a system for accounting for gambling plaques and cage procedures.

9.4.2. Where a value chip exists for a denomination equivalent to a plaque, the primary colour used on the value chip must be utilised as the primary colour for the plaque.

9.5. Primary, Secondary, and Reserve Sets of Gambling Chips

Regulatory Compliance Statement - Casino licence holders must maintain primary and reserve sets of **chips** that meet Board requirements. Reserve sets must be distinct in colour and design to prevent fraud and ensure operational continuity in case of counterfeit or defects.

9.5.1. Unless otherwise authorised by the Board, each casino licence holder shall have a primary set of gambling chips and a reserve set of value chips which shall conform to the requirements of these Rules.

9.5.2. The reserve set of value chips shall have primary colours which do not resemble the primary colours allocated to the primary set and shall be required for denominations over R500.

9.5.3. Each casino licence holder shall have a reserve non-value chip set for every 20 roulette tables in the casino with a design or symbol different from those non-value chips comprising the primary set.

9.5.4. The casino licence holder shall remove the primary set of gambling chips from active play whenever:

9.5.4.1. it is believed the casino is receiving or redeeming counterfeit chips;

- 9.5.4.2. any impropriety or defect in the utilisation of the primary set of chips makes removal of the primary set necessary; or
 - 9.5.4.3. the Board or its agent or an inspector of the Board so directs, whereupon the reserve set shall be placed into active play.
- 9.5.5. Whenever the primary set of chips is removed from active play, the casino licence holder shall immediately notify the Board of this and the reason for such occurrence.

9.6. Submission of Gambling Chips, Plaques (where applicable) and Promotional Chips for Review and Approval

Casino licence holders must submit **designs and samples of chips, plaques, and promotional chips** for Board approval before manufacture or use. Chips must be clearly identifiable under surveillance and reflect the casino's trading name.

- 9.6.1. A casino licence holder shall submit to the Board:
 - 9.6.1.1. a full colour drawing to scale of the design, detail, diameter, measurements and artwork of each denomination of gambling plaque, the final artwork of each value and non-value chip in its primary and secondary sets, and the final artwork of each promotional chip, for certification and approval; and
 - 9.6.1.2. for its notice, details of the name and registration number of the manufacturer and distributor of such chips.
- 9.6.2. A casino licence holder shall not manufacture or cause to be manufactured chips, plaques or promotional chips for gambling purposes until the Board has approved the design thereof.
- 9.6.3. Once the Board has approved the final artwork and the chips, plaques and promotional chips have been ordered, a sample of each must be supplied to the Board prior to the said chips being utilised for gambling purposes.
- 9.6.4. Each chip must be designed and made so that when stacked with chips of other denominations and viewed on a surveillance system, each gambling chip of a specific denomination is clearly distinguishable from gaming chips of other denominations in the stack.
- 9.6.5. With the exception of non-value gambling chips, all other gambling chips must clearly reflect the trading name of the casino.

9.6.6. All value chips must be designed in such a way that:

9.6.6.1. the value of such chip is clearly reflected on both sides of the chip.

9.6.6.2. the colour used as the primary colour must denote the denomination of the chip and reflected below.

9.6.7. The primary colours of sets of value chips must be as follows:

Value	Colour
R20	Flesh/Salmon/Pale Peach
R25	Dark Blue/Tan Brown
R50	Red
R100	Black
R500	White
R1 000	Bright Pink
R5 000	Turquoise
R10 000	Grape

9.7. Nature and exchange of Gambling Chips, Plaques (where applicable) and Promotional Chips for Review and Approval

Regulatory Compliance Statement - Casino licence holders must ensure that all wagering is conducted using **Board-approved value instruments** and that chips, plaques, and promotional chips are issued, redeemed, and exchanged under strict controls. Redemption for amounts over the threshold must be processed via **secure electronic payment methods** (e.g., EFT) instead of casino cheques, ensuring traceability and compliance with anti-money laundering standards.

9.7.1. All wagering in a casino shall be conducted with value instruments approved by the Board: *Provided that where legal tender of the Republic is used for gambling, such approval shall not be required.*

9.7.2. Gambling chips previously issued by a casino licence holder which are not in active use by that casino licence holder shall not be used for wagering at authorised table games.

9.7.3. Gambling chips or plaques shall be issued to a person only at the request of such person and shall not be given as change in any transaction other than a gambling transaction.

- 9.7.4. Gambling chips other than special use gambling chips shall only be issued to casino patrons from a cash desk or at gambling tables and shall only be redeemed at the cash desk (cage): *Provided that gambling chips may be exchanged by a patron at the gambling machine booths for currency, coin, or gambling machine tokens required to play the gambling machines.*
- 9.7.5. Gambling chips and other value instruments may only be redeemed at the cash desk or by means of a device located in the casino gambling area for the specific purpose of value instrument redemption and which shall be continuously controlled and monitored by the cash desk.
- 9.7.6. Each gambling chip and plaque is evidence of a debt that the casino licence holder owes to the person legally in possession of the gambling chip or plaque and shall remain the property of the issuing casino licence holder, which shall have the right at any time to demand that any person in possession of the gambling chip or plaque surrender the item to that casino licence holder.
- 9.7.7. Each casino licence holder shall promptly redeem its own genuine gambling chips, plaques or value held on a smart card upon request by a patron, unless the gambling chips or plaques were obtained or are being used unlawfully.
- 9.7.8. A casino licence holder shall redeem gambling chips or plaques by exchanging them for:
- 9.7.8.1. an equivalent amount of cash; or
 - 9.7.8.2. upon request by a patron who surrenders gambling chips or plaques in any amount over R10 000, payment shall be made via electronic funds transfer (EFT) or another Board-approved cashless method, dated the day of such redemption.
- 9.7.9. The electronic payment shall only be issued for that portion of the redemption which can be established as winnings.
- 9.7.10. The casino may process an EFT for a lesser amount but only up to the amount that relates to winnings.
- 9.7.11. Each casino licence holder shall have the right to demand the redemption of its gambling chips and plaques from any person in possession thereof and such person shall redeem said chips and plaques upon presentation by the casino licence holder of cash to an equivalent amount.
- 9.7.12. Each casino licence holder shall promptly redeem its own genuine gambling chips and plaques presented to it by any other legally operated casino licence holder.
- 9.7.13. The redemption process for credit plaques from another casino must be contained in the casino licence holder's minimum standards of internal controls as approved by the Board.
- 9.7.14. Each casino licence holder shall submit to the Board for approval a system for chip and token exchange between themselves and other legally operated casino licence holders, of gambling chips, plaques and tokens:

- 9.7.14.1. that are in its possession and that have been issued by other legally operated casino licence holders; and
 - 9.7.14.2. that it has issued and that are presented to it for redemption by any other legally operated casino licence holder.
- 9.7.15. Apart from value chips, plaques and non-value chips a casino may make use of gambling chips as non-negotiable chips, promotional chips and special use gambling chips and these chips:
- 9.7.15.1. may deviate from the colour requirements in respect of value chips and non-value chips.
 - 9.7.15.2. shall be designed in such a manner as to be clearly distinguishable from other gambling chips used in the casino; and
 - 9.7.15.3. the word “non-negotiable”, “NN”, “no cash value” or some similar indication of the limited negotiability of the chip must be clearly indicated on at least one side thereof.
- 9.7.16. Prior to the use thereof a casino shall submit to the Board for approval the issue, use and restrictions pertaining to special use gambling chips.

9.8. Receipt, Inventory, Security, Storage and Destruction of Gambling Chips and Plaques (where applicable)

Regulatory Compliance Statement - Casino licence holders must ensure that all gambling chips and plaques received from manufacturers or distributors are verified, recorded, securely stored, and destroyed under Board-approved procedures. These controls maintain traceability, prevent fraud, and safeguard the integrity of casino operations.

- 9.8.1. When gambling chips or plaques are received from the manufacturer or distributor, they shall be opened and checked:
 - 9.8.1.1. by at least three people (excluding the Board representative), one from the casino accounting department, one from internal or external auditing, and one from the security department.
 - 9.8.1.2. under surveillance camera coverage.
- 9.8.2. The casino licence holder must notify the Board at least one week prior to the pending arrival of the chips or plaques.

- 9.8.3. Any deviation between the invoice and actual chips or plaques received, or any defects found, shall be reported promptly to the Board.
- 9.8.4. After checking, the casino licence holder shall record in a chip inventory ledger:
 - 9.8.4.1. denomination of chips and plaques received.
 - 9.8.4.2. number of each denomination.
 - 9.8.4.3. serial number of each plaque.
 - 9.8.4.4. description and number of all non-value chips.
 - 9.8.4.5. date of receipt.
 - 9.8.4.6. signatures and names or employee numbers of individuals who checked the chips and plaques.
- 9.8.5. Chips or plaques held in reserve and not in active use shall be recorded as reserve inventory and stored in separate locked compartments in: (a) an approved casino vault or safe; or (b) a comparable secure area approved by the Board.
- 9.8.6. Secondary set chips shall be recorded and stored separately from reserve chips in locked compartments in an approved secure area.
- 9.8.7. Whenever chips or plaques are taken from or returned to reserve or secondary inventory, this shall be performed in the presence of at least two individuals and recorded in the chip inventory ledger with date, denominations, quantities, and signatures.
- 9.8.8. A casino licence holder shall: (a) compute and record the unredeemed liability for each denomination at the end of each gambling day; (b) perform at least monthly inventory of chips and plaques in circulation and reserve; (c) record results in the chip inventory ledger.
- 9.8.9. Procedures for computing unredeemed liability and inventory shall be submitted to the Board for approval.
- 9.8.10. A physical inventory of reserve chips and plaques is required annually if compartments are sealed and seals remain intact.
- 9.8.11. Prior to destruction of chips and plaques, the casino licence holder shall notify the Board in writing of date and location of destruction; denomination, number, and value of chips or plaques; description and number of non-value chips; and method of destruction.
- 9.8.12. Unless otherwise authorised, destruction shall be carried out in the presence of at least two people, one from the security department.
- 9.8.13. Details of destroyed chips and plaques shall be recorded in the chip inventory ledger with names, signatures, and date.
- 9.8.14. A written log shall be maintained of all personnel involved in destruction, including names, registration numbers, and business addresses of non-casino personnel.

9.8.15. The casino licence holder shall ensure adequate Board-approved security for all chips and plaques at all times.

9.9. Dice: Physical Characteristics

All dice used in gambling must **conform to SANS1718 standards** to ensure fairness, uniformity, and compliance with approved technical specifications.

9.10. Dice: Receipt, Storage, Inspection and removal from Use

Casino licence holders must implement strict controls for the **receipt, inspection, storage, and removal of dice** to prevent tampering and maintain game integrity. Dice must be stored in secure, Board-approved areas, inspected daily, and any damaged or tampered dice must be reported and destroyed under Board oversight.

9.10.1. Immediately upon receipt of dice from the manufacturer or distributor, they shall be inspected by a member of the security department and a member of the casino department to ensure seals on each box are intact, unbroken, and free from tampering.

9.10.2. Boxes that do not satisfy the criteria in sub-rule (1) shall be inspected immediately to ensure dice conform to Board Rules and assure fair play.

9.10.3. Boxes satisfying the criteria, together with boxes having unbroken, intact, and untampered seals, shall then be placed for storage in a locked cabinet in the security department within a primary and secondary storage area.

9.10.4. Dice distributed to gambling pits or tables shall be taken from the primary storage area, the location and physical characteristics of which shall be subject to Board approval.

9.10.5. Secondary storage areas shall be used for surplus dice.

9.10.6. Dice in secondary storage shall not be distributed for gambling until moved to a primary storage area.

9.10.7. All secondary storage areas shall be located in secure areas approved by the Board.

9.10.8. All secondary storage areas shall have two separate locks: security department maintains one key; and casino department maintains the other key (no access below assistant casino manager level).

9.10.9. Dice stored in the primary storage area shall be secured by a lock, the key to which shall be maintained by the security department.

9.10.10. Prior to commencement of each day, the security department shall remove the appropriate number of dice for that gambling day from the primary storage area.

- 9.10.11. All envelope bags or containers used to hold or transport pre-inspected dice to the casino floor and those collected at the end of each gambling day shall be transparent.
- 9.10.12. The envelope bags or containers and sealing method shall be designed to make tampering evident and shall be subject to Board approval.
- 9.10.13. All dice shall be inspected and distributed to gaming tables by gaming floor management.
- 9.10.14. All dice shall be collected, inspected, and returned to the Surveillance Department at the end of the operational shift.
- 9.10.15. Surveillance shall inspect dice for tampering and/or damage. If any tampering or damage is detected, approval shall be sought from the Board for destruction of said dice.
- 9.10.16. All extra dice in the reserve that are to be destroyed shall be placed in a sealed envelope bag or container and a label shall be attached to each envelope bag or container which identifies the date and is signed by the pit boss, whose name or Board registration number must appear under the signature.
- 9.10.17. At the end of each gambling day, or at least once each gambling day at the same time each day, as determined by the casino licence holder and approved by the Board, and at such other times as may be necessary, a casino security officer shall collect and sign all envelope bags or containers of used dice and any dice in the dice reserve that are to be destroyed and shall transport them to the security department for destruction.
- 9.10.18. No dice that have been placed in a cup for use in a game shall remain on the table for more than 24 hours.
- 9.10.19. At the end of each gambling day, or at least once each gambling day at the same time each day as determined by the casino licence holder and approved by the Board, and at such other times as may be necessary, a security officer may collect all extra dice in reserve that are still sealed.
- 9.10.20. The casino licence holder shall submit to the Board for approval, procedures for:
- 9.10.20.1. a dice inventory system which shall include at least the recording of: (i) the balance of dice on hand; (ii) the dice removed from storage; (iii) the dice returned to storage or received from the manufacturer; (iv) the date of the transaction; (v) the signatures and names of the individuals involved.
 - 9.10.20.2. a reconciliation on a daily basis of the dice distributed, the dice destroyed, the dice returned to the primary storage area and if any, the dice in the secondary storage area.

9.10.20.3. a physical inventory of all the dice at least once every month, to which the following shall apply: (i) this inventory shall be performed by an individual with no incompatible functions and shall be compared to the balance of the dice on hand required in paragraph (a) above; (ii) any discrepancies shall immediately be reported to the Board.

9.10.21. All destruction and cancellations of dice, other than those retained by the security department required in sub-rule (18) above, shall:

9.10.21.1. be completed within 48 hours of collection.

9.10.21.2. occur either by drilling a hole through each die or by incineration.

9.10.21.3. take place in a secure place, the location and physical characteristics of which shall be subject to the approval of the Board.

9.10.22. A magnet shall be kept in a compartment at the pit stand and shall at all times be readily available for use by the Board upon request.

9.10.23. A licence holder shall not use a storage area, secure place or bag which is subject to the approval of the Board in terms of this sub-rule and which has not been so approved.

9.11. Cards: Physical Characteristics

Regulatory Compliance Statement - All cards used in gambling must **conform to SANS1718 standards**, be visually distinguishable for different games, and have Board-approved back designs to prevent tampering and maintain game integrity.

9.11.1. Cards used in gambling shall conform to the requirements of **SANS1718**.

9.11.2. Cards used at poker must be visually distinguishable from cards used for other table games.

9.11.3. For each card game, the casino licence holder shall have at least six visually distinguishable card back colours.

9.11.4. Card back designs must be submitted to the Board for approval before use.

9.11.5. All card back designs shall include a white border around the sides of the card.

9.12. Cards Receipt, Storage, Inspection and removal from Use

Casino licence holders must implement strict controls for the **receipt, inspection, storage, and removal of cards** to prevent tampering and ensure fairness. Cards must be stored in secure, Board-approved areas, inspected daily, and replaced promptly when damaged or compromised.

- 9.12.1. When decks of cards are received from the manufacturer or distributor, they shall be placed for storage in a primary (daily issue) or secondary (bulk storage) area by at least two individuals: one from the casino tables department and one from the surveillance department.
- 9.12.2. The daily issue or primary storage area shall be located in the surveillance department, subject to Board approval.
- 9.12.3. Secondary bulk storage areas shall be used for surplus cards.
- 9.12.4. Cards in secondary storage shall not be distributed until moved to the primary storage area.
- 9.12.5. All secondary storage areas shall be located in secure areas.
- 9.12.6. Secondary storage areas shall have two separate locks: surveillance department maintains one key; and casino tables department maintains the other key (no access below Assistant Casino Manager level).
- 9.12.7. Cards stored in the primary storage area shall be secured by a lock, the key to which shall be maintained by the surveillance department.
- 9.12.8. Prior to each gambling day, the surveillance department shall remove the appropriate number of decks from the primary storage area.
- 9.12.9. Each table's cards shall be placed in a sealed envelope or container for distribution to the pit stand.
- 9.12.10. A set of replacement cards for each pit shall also be placed in an envelope or container.
- 9.12.11. The **Gaming Floor Manager or Floor Supervisor** shall examine each package at the table to confirm all decks are present and of the same colour.
- 9.12.12. Prior to use, all decks shall be inspected by the dealer and verified by an in-house inspector.
- 9.12.13. Card inspection shall require sorting into sequence and suit to ensure completeness and checking backs for scratches or marks.
- 9.12.14. Unsuitable Cards
 - 9.12.14.1. If a card is unsuitable, the **Gaming Floor Manager** shall bring a substitute card from the replacement set.
 - 9.12.14.2. The unsuitable card shall be placed in a sealed envelope, identified by table number, date, and time, and signed by the dealer and inspector.

- 9.12.14.3. The **Gaming Floor Manager** shall keep the envelope in a secure place until collection by security at the end of the gambling day.
- 9.12.15. Seals Safeguarding Controls
- 9.12.15.1. All envelope bags or containers used to hold or transport cards shall be transparent.
- 9.12.15.2. Seals must make tampering evident.
- 9.12.15.3. Bags, containers, and seals must be Board-approved.
- 9.12.16. All cards opened and placed on a table shall be changed at least every 24 hours unless the Board approves a longer period.
- 9.12.17. **Damaged Cards Procedures**
- 9.12.17.1. Damaged cards shall be replaced by the dealer, who shall request the **Gaming Floor Manager** to bring a substitute card.
- 9.12.17.2. The damaged card shall be sealed, identified, and signed by the dealer and the individual who brought the replacement card.
- 9.12.17.3. The **Gaming Floor Manager** shall keep the envelopes in a secure place until collected by security.
- 9.12.18. Used Cards Inventorying
- 9.12.18.1. At the end of each gambling day, or at least once daily at the same time, the **Gaming Floor Manager** shall collect all used cards.
- 9.12.18.2. Cards shall be sealed and labelled with table number, date, and time, signed by the dealer and floor person.
- 9.12.18.3. The **Gaming Floor Manager** shall maintain the envelopes in a secure place until collected by security.
- 9.12.19. The casino licence holder shall remove any cards showing tampering, marks, or defects that affect game integrity, or at the request of the Board.
- 9.12.20. All extra decks in the replacement set with broken seals shall be sealed and labelled, signed by the **Gaming Floor Manager**.
- 9.12.21. At the end of each gambling day, a security officer shall collect and sign for all envelopes with damaged cards, used cards, and extra decks with broken seals, and return them to the surveillance department.
- 9.12.22. When returned to surveillance, envelopes shall be inspected for tampering, marks, alterations, missing or extra cards, or anything indicating unfair play.
- 9.12.23. Cards Inspection

- 9.12.23.1. The surveillance department shall inspect all decks used during the day.
 - 9.12.23.2. The casino licence holder shall also inspect all cards requested by the Board or its inspector, any cards removed for suspected tampering, and all cards used for poker.
 - 9.12.23.3. Inspection procedures shall include:
 - 9.12.23.3.1. Sorting cards sequentially by suit;
 - 9.12.23.3.2. Inspection under ultraviolet light;
 - 9.12.23.3.3. Checking sides for crimps, bends, cuts, and shavings.
 - 9.12.23.3.4. Inspecting fronts and backs of plastic cards for consistent shading and colouring.
 - 9.12.23.4. After inspection, each deck shall be destroyed and may not be reused for gambling.
 - 9.12.23.5. The casino licence holder shall develop internal control procedures for issuing cards and returning unused sealed cards to storage.
 - 9.12.23.6. Evidence of tampering, marks, alterations, missing or additional cards, or anything indicating unfair play shall be immediately reported to the Board with a copy of the investigation report.
 - 9.12.23.7. Cards related to incidents in (6) shall be retained until the Board authorises destruction.
- 9.12.24. The casino licence holder shall submit to the Board for approval procedures for:
- 9.12.24.1. A card inventory system including:(i) Balance of cards on hand; (ii) Cards removed from storage;(iii) Cards returned to storage or received from the manufacturer;(iv) Date of transaction;(v) Signatures and names of individuals involved.
 - 9.12.24.2. Daily reconciliation of cards distributed, destroyed, and returned to storage.
 - 9.12.24.3. Physical inventory of cards at least once every three months, performed by an individual with no incompatible functions, compared to recorded balances, with discrepancies immediately reported to the Board.
- 9.12.25. Destruction of cards shall be by shredding or another Board-approved method and shall occur in a secure location approved by the Board.

9.13. Roulette Balls - All roulette balls used in gambling must **conform to SANS1718 standards** to ensure fairness, uniformity, and compliance with approved technical specifications.

9.14. Roulette Wheels

Regulatory Compliance Statement - Roulette wheels must meet **SANS1718 standards** and be maintained according to manufacturer specifications and Board-approved procedures. Regular inspections and secure storage are required to prevent tampering and ensure operational integrity.

9.14.1. Roulette wheels used in gambling shall conform to the requirements of **SANS1718**.

9.14.2. Maintenance of roulette wheels shall be carried out monthly by trained personnel and include:

9.14.2.1. Removing cylinders and cleaning the bowl with a dust air blower.

9.14.2.2. Cleaning the edge of the cylinder and bowl.

9.14.2.3. Ensuring security seals are intact and bowl/cylinder numbers correspond.

9.14.2.4. Oiling top and bottom bearings at marked points if necessary.

9.14.2.5. Oiling the spindle top if necessary.

9.14.2.6. Using correct oil specified by the manufacturer (avoid grease).

9.14.2.7. Cleaning built-up grease along the ball track with approved materials.

9.14.2.8. Cleaning ball pockets with a dust air blower.

9.14.2.9. Ensuring cylinder runs freely and smoothly after replacement.

9.14.2.10. Measuring ball pockets with a dial caliper gauge during maintenance and checking tolerances.

9.14.3. The alignment of the bowl must be checked daily using a spirit level across the rim.

9.14.4. The cylinder must be checked daily and after replacement.

9.14.5. Removal, replacement, or resetting of the wheel must follow manufacturer specifications.

9.14.6. Major repairs (e.g., spindle replacement or breaking seals) must only be performed by the registered manufacturer.

9.14.7. A maintenance log must be kept for each wheel and be available for Board inspection.

9.14.8. Faulty wheels must be removed and repaired before use.

9.14.9. Annual inspection by a registered manufacturer or supplier must include:

9.14.9.1. Verification of cleaning and maintenance procedures.

9.14.9.2. Checking all security seals.

9.14.9.3. Checking manufacturing tolerances.

- 9.14.9.4. Full calibration of the wheel.
- 9.14.9.5. Checking rise and fall of the cylinder.
- 9.14.9.6. Inspecting ball track for wear.
- 9.14.9.7. Inspecting pocket surfaces and replacing damaged ones.
- 9.14.9.8. Ensuring all hazards are firm and secure.
- 9.14.10. A special log for annual inspections must be maintained and available for Board inspection.
- 9.14.11. Defective devices must be removed from the gambling floor immediately.
- 9.14.12. During non-operating hours or table closure, a transparent security cover must be fitted over the bowl and turret to prevent tampering.
- 9.14.13. The cover must be fixed to prevent access, and sealing/unsealing or locking/unlocking must be recorded in a logbook and verified by a **senior security officer and Gaming Floor Manager** for both table opening and closing.
- 9.14.14. Damaged Wheel
 - 9.14.14.1. The Board must be notified prior to removal of a damaged wheel or any interchange of wheels between tables or storage.
 - 9.14.14.2. The number of the new wheel must be recorded in the maintenance logbook for that table.
 - 9.14.14.3. The new wheel must be properly levelled and tested before play resumes.
- 9.14.15. Spare roulette wheels must be stored in a secure area.

PART J: SURVEILLANCE SYSTEMS

10. Overarching Policy Compliance Statement

Casino licence holders shall ensure that surveillance systems are modern, secure, and capable of continuous monitoring and recording of all critical areas. Systems must meet Board-approved technical standards, provide redundancy, and prevent tampering. Access shall be restricted to authorised personnel, and all surveillance activities must be logged and auditable.

10.1. Application of this Part

The provisions of this Part shall apply to casino licence holders only.

10.2. Definitions

In this Part, words and phrases shall have the meaning accorded to them in the Act, Regulations, and Rules and, unless the context otherwise requires:

10.2.1. **Control Unit:** A device capable of:

- 10.2.1.1. Connecting any camera to any monitor in the surveillance system.
- 10.2.1.2. Controlling PTZ cameras at a variable speed.
- 10.2.1.3. Controlling all **digital video network recording systems** in the surveillance system.

10.2.2. **Dedicated Camera:** A video camera required to monitor and record a specified activity continuously.

10.2.3. **Matrix:** A microprocessor-controlled switching device enabling the system to direct any number of inputs to any number of outputs.

10.2.4. **Monitor:** A device capable of displaying high-resolution digital video or multiple digital videos. This monitor could be:

- 10.2.4.1. A monitor that displays one camera digital video feed at a time measuring a minimum of **17 inches diagonally**.
- 10.2.4.2. A larger monitor or monitor wall with a permanent digital video split where each window within the split displays one camera digital video feed at a time measuring a minimum of **17 inches diagonally**.

10.2.5. **PTZ Camera:** Must have:

10.2.5.1. **Pan 360° at $\geq 120^\circ$ per second.**

10.2.5.2. **Tilt 180° .**

10.2.5.3. Orientation capability.

10.2.5.4. **Pre-set capabilities with a minimum pre-set speed of 360° per second;**

10.2.5.5. Zoom capacity.

10.2.6. **Satellite Monitoring Equipment:** Remote station with access to the surveillance system capable of monitoring and switching signals only.

10.2.7. **Titler:** Device capable of superimposing time, date, and title onto a video signal.

10.2.8. **Video Loss Detector:** Device capable of detecting video loss and generating an alarm.

10.2.9. **Video Printer:** Device capable of generating a clear still image from recorded video upon command.

10.3. Minimum Rules

The Board may impose **stricter surveillance requirements** than those outlined in this Part to address operational risks or compliance concerns.

10.3.1. **Control Unit:** A device capable of:

10.3.1.1. Connecting any camera to any monitor in the surveillance system;

10.3.1.2. Controlling PTZ cameras at a variable speed; and

10.3.1.3. Controlling all **digital video network recording systems** in the surveillance system.

10.3.2. **Dedicated Camera:** A video camera required to monitor and record a specified activity continuously.

10.4. Surveillance Systems: General Requirements

Licence holders must ensure that surveillance systems provide comprehensive, high-quality visual coverage of all critical areas. Surveillance rooms must be equipped with appropriate technology to facilitate effective monitoring, investigation, and regulatory oversight. Audio transmission remains optional unless explicitly required by the Board.

10.4.1. Surveillance Room Equipment and Configuration

- 10.4.1.1. Surveillance rooms shall be equipped with **high-resolution monitors** capable of displaying clear and detailed imagery.
- 10.4.1.2. Monitor controls must be **accessible and operable** without compromising system security; the requirement for front-mounted controls is no longer applicable.
- 10.4.1.3. Surveillance systems must support **dynamic view selection**, allowing any camera feed to be displayed on any monitor.
- 10.4.1.4. The number and configuration of monitors shall be **proportionate to the number and intensity of camera coverage**, ensuring effective monitoring.
- 10.4.1.5. Prescriptive ratios (e.g., one monitor per 25 cameras in gambling machine areas and one per 15 in table areas) are no longer mandatory, but licensees must demonstrate that monitor allocation supports effective surveillance coverage.
- 10.4.1.6. Staffing ratios (e.g., one surveillance officer per eight monitors) are no longer fixed but must be **risk-based and operationally justified**, ensuring adequate monitoring during operating hours.
- 10.4.1.7. All **cash-up, transaction, and count areas** must be included in surveillance coverage planning and staffing considerations.

10.4.2. Camera Installation and Functionality

- 10.4.2.1. Cameras must be installed to **prevent tampering** by patrons and employees.
- 10.4.2.2. Camera control must be enabled via a **variable speed control unit** or equivalent digital interface from the surveillance room.
- 10.4.2.3. Cameras located on the casino floor and in count rooms must be connected to **dedicated recording channels**; however, modern multi-channel recorders may be used if they ensure data integrity and accessibility.
- 10.4.2.4. Cameras of varying resolutions may be used based on environmental conditions and surveillance objectives, provided they deliver **optimum clarity**.
- 10.4.2.5. **High-resolution colour cameras** must be used to monitor all table games.
- 10.4.2.6. Each camera must be capable of having its feed displayed on a monitor, either directly or via a digital matrix system.

10.4.3. Recording System Requirements

- 10.4.3.1. Video recorders must be **selectable and controllable** from the surveillance room control unit.
- 10.4.3.2. Recorders must support **multi-channel input**, simultaneous recording, playback, and secure data storage.

- 10.4.3.3. Surveillance footage must be **timestamped, retained, and protected** in accordance with the Board's data retention and access policies.

10.4.4. **System Protection and Maintenance**

- 10.4.4.1. A lightning protection unit or equivalent surge protection must be installed to safeguard the surveillance system.
- 10.4.4.2. Licensees must ensure that surveillance systems are regularly maintained, tested, and upgraded to meet evolving technical standards and regulatory requirements.

10.5. **Surveillance Systems: Count Rooms and Cashiering Area**

Licence holders must install and maintain surveillance systems that provide clear, unobstructed, and continuous monitoring of all count room and cashiering activities. These systems must support visual and, where required, audio recording, panic alarm integration, and interface capabilities with critical equipment.

10.5.1. **Required Surveillance Coverage**

- 10.5.1.1. Licensees shall ensure that the surveillance system monitors and records the following areas with sufficient clarity and reliability:
 - 10.5.1.1.1. **Scales in count rooms** - Must be clearly visible and have interface capabilities with the surveillance system.
 - 10.5.1.1.2. **Administration offices within count rooms** - Surveillance must cover walls, doors, equipment, and employee movements.
 - 10.5.1.1.3. **Panic alarms in administration offices of count rooms** - Must be installed, integrated into the surveillance system, and capable of being recorded.
 - 10.5.1.1.4. **Counting surfaces in count rooms** - Must be monitored by dedicated cameras.
 - 10.5.1.1.5. **Note counters in count rooms** - Must be monitored and have interface capabilities with the surveillance system.
 - 10.5.1.1.6. **Panic alarms in count rooms** - Must be installed and integrated into the surveillance system for recording.
 - 10.5.1.1.7. **Cashiering booths** - Surveillance must cover:
 - 10.5.1.1.7.1. Customer transaction windows (with close-up views to identify chip values and currency).

10.5.1.1.7.2. Employee windows, cash drawers, vaults, safes, counters, chip storage, and fill windows.

10.5.1.1.8. **Panic alarms in cashiering areas** - Each transaction area must have a panic alarm integrated into the surveillance system and capable of being recorded.

10.5.2. Recording Requirements

10.5.2.1. All activities within **count rooms and cashiering areas** must be recorded with sufficient clarity to:

10.5.2.1.1. Identify each employee and their movements.

10.5.2.1.2. Identify all currency, coins, chips, and associated paperwork.

10.5.3. Audio Monitoring

10.5.3.1. Audio capabilities must be installed in:

10.5.3.1.1. Count room administration offices.

10.5.3.1.2. Count rooms.

10.5.3.1.3. Each transaction window in cashiering booths.

10.5.4. **Retention of Surveillance Footage** - video recordings from count rooms must be retained for a **minimum of 30 days**, or longer if required by the Board for investigative or compliance purposes.

10.6. Surveillance Systems: Gambling Machines

Regulatory Compliance Statement - Licence holders must ensure that surveillance systems provide clear, unobstructed, and continuous monitoring of gambling machines and associated cashiering booths. These systems must support integration with machine diagnostics and transaction monitoring tools to ensure regulatory oversight and operational integrity.

10.6.1. **Camera Positioning and Coverage** - Cameras monitoring gambling machines must be positioned to ensure that:

10.6.1.1. The **betting buttons, tower light, and machine base** are clearly visible.

10.6.1.2. Where **IP cameras** are in use, a **maximum of twelve (12) machines** may be covered by one camera, provided that visibility and clarity are not compromised.

10.6.1.3. Gaps between machines must be considered when determining the required number of cameras to ensure full coverage.

10.6.2. **Public Alarm Integration** - all **cashiering booths** associated with gambling machines must be equipped with **panic alarm buttons** that are directly linked to the surveillance system and capable of being recorded.

10.6.3. **System Interface and Monitoring Requirements** - the casino monitoring system must be **interfaced with gambling machines** to ensure that the following data is captured and reported.

10.6.4. **Gambling Machine Error Codes** - All relevant error codes must be reported to the monitoring system in real time.

Note: References to coin counters and weigh scales have been removed due to the transition to a cashless environment.

10.7. Surveillance Systems: Surveillance and/or Security Offices

Regulatory Compliance Statement - Licence holders must ensure that surveillance and security offices including the electronic monitoring system (EMS) are accessible to the Board and its agents at all times, and that surveillance operations within these areas are subject to continuous monitoring and recording to uphold regulatory integrity.

10.7.1. The Board, its agents, and inspectors shall be provided **immediate and unrestricted access** to the surveillance room and any other designated surveillance areas at all times.

10.7.2. The **interior of the surveillance room**, including working areas, employees, and their movements, must be recorded. The surveillance room must also be equipped with **audio monitoring capabilities**.

10.8. Surveillance Systems: Electronic Monitoring Systems

10.8.1. The **exterior of the EMS control room** must be recorded to ensure visibility of access and activity.

10.8.2. The Board, its agents, and inspectors shall be provided **immediate and unrestricted access** to the EMS control room at all times.

10.9. Surveillance Systems: Recording Requirements

Regulatory Compliance Statement - Licence holders must maintain approved procedures for the secure storage and retention of surveillance recordings, ensuring traceability, integrity, and regulatory access. Licence holders must submit to the Board, in writing, the procedures used for **storing and recordkeeping of digital/video recordings**:

10.9.1. At least **one calendar month prior to commencement of operations**, or

10.9.2. At least **one calendar month prior to any amendment** to the existing approved method.

10.10. Surveillance Systems: Plans and Alteration

Regulatory Compliance Statement - Licence holders must maintain a comprehensive and Board-approved surveillance system plan, and must seek prior approval for any alterations, including temporary or covert installations.

10.10.1. The surveillance system plan must include:

10.10.1.1. A **casino floor plan** showing the placement of all surveillance equipment.

10.10.1.2. **Details of each camera's view** and coverage area.

10.10.1.3. A **narrative identifying machines and tables** covered by each camera.

10.10.1.4. A **detailed inventory** of the surveillance system, including:

10.10.1.4.1. Number of cameras and monitors.

10.10.1.4.2. Specifications of all equipment.

10.10.1.4.3. Matrix plan.

10.10.1.4.4. Procedures for alarm-secured areas, entrances, and exits.

10.10.2. The **camera installation plan** must be **signed off and approved by the Board** upon completion of installation.

10.10.3. For all other surveillance system components, **Board approval must be obtained prior to installation.**

10.10.4. Alterations

10.10.4.1. A licence applicant or holder must submit an **amended surveillance plan** to the Board **no later than 30 days prior** to any proposed alteration.

10.10.4.2. This requirement applies to **temporary or semi-permanent installations.**

10.10.4.3. A **minimum of two days' notice** must be given to the Board for consideration of **covert camera installations.**

10.11. Surveillance Systems: Limited Gambling Machine Coverage

Licencees may use a single camera to monitor a limited number of gambling machines, subject to Board discretion to require additional coverage where necessary to ensure regulatory adequacy.

10.11.1. Subject to the provisions of Rule 10.6, a **single camera may be used to cover a limited number of gambling machines** on a site: *Provided that the Board may require additional cameras where necessary to ensure adequate coverage.*

PART K: CENTRAL MONITORING AND CONTROL SYSTEMS (CMCS)

11. Overarching Policy Compliance Statement

The ECGB mandates the implementation of secure, computerised Central Monitoring and Control Systems (CMCS) by all licensed gambling machine route operators and casinos. These systems must ensure real-time monitoring, logging, control, and reporting of gambling equipment events, financial data, and system integrity. CMCS must comply with SANS1718 standards and additional Board-specified requirements to support regulatory oversight, operational transparency, and data security.

11.1. General Requirements - Licensees must implement CMCS solutions that meet the Board's technical, operational, and security requirements, including SANS1718 compliance and extended logging capabilities for casino operations.

11.1.1. Gambling machine route operators and casinos must implement a **computerised online CMCS** capable of meeting the Board's requirements.

11.1.2. The CMCS for casinos must comply with **SANS1718** standards.

11.1.3. In addition to SANS1718, casino CMCS must log, search, and report the following events:

11.1.3.1. Door open/close events (authorised/unauthorised)

11.1.3.2. Invalid service/key card usage

11.1.3.3. Power on/off

11.1.3.4. CMS connection status

11.1.3.5. Jackpot and progressive jackpot wins and resets

11.1.3.6. Credit cancel

11.1.3.7. Personnel access logs

11.1.3.8. Component errors

11.1.3.9. Financial and soft meter data (in/out/jackpot/handle pull/bill validator)

11.1.3.10. Soft meter vs hard count comparison

11.1.3.11. Secure data collection

11.1.3.12. Manual input logging

11.1.3.13. Any other Board-determined requirements

11.1.4. The CMCS must be **computer-based** with sufficient capacity (processing, memory, communication interfaces, and storage) to monitor, log, and control all gambling devices for **at least 10 days**.

- 11.2. **CMCS Hardware and Software** - Licensees must ensure that CMCS hardware and software configurations are certified and approved by the Board, with all upgrades subject to prior evaluation for reliability, security, and auditability.
- 11.2.1. CMCS hardware and software must be **certified to conform with SABS standards** and approved by the Board prior to use.
- 11.2.2. The certification and approval process shall include evaluation of:
- 11.2.2.1. Reliability
 - 11.2.2.2. Recovery
 - 11.2.2.3. Auditability
 - 11.2.2.4. Redundancy
 - 11.2.2.5. Security
- 11.2.3. All **software upgrades or changes** must be approved by the Board **prior to implementation**.
- 11.3. **Meter Wrap Handling and Meter Width** - Licensees must implement procedures and software capable of detecting and correctly handling meter wrap events to preserve accurate statistical reporting.
- 11.3.1. Operational procedures and software must ensure that the **maximum counting capacity** of meters and the **expected rate of meter counts** are sufficient to detect and correctly handle **meter wrap events**, preserving true total statistics.
- 11.4. **Device Configuration Database** - Licensees must maintain a retrievable configuration database for each gambling device, capturing location, specifications, and operational history.
- 11.4.1. The monitoring system must maintain the following for each gambling device:
- 11.4.1.1. Location.
 - 11.4.1.2. Device description (serial number, manufacturer, registration number).
 - 11.4.1.3. Configuration (denomination, software version, games, progressive status).
 - 11.4.1.4. History of upgrades, movements, and reconfigurations.
- 11.5. **Access Control and Authentication** - Licensees must implement robust access control mechanisms across all operating systems and monitoring platforms. These must include password protection, multi-factor authentication, encrypted credential storage, and user privilege tracking to ensure system integrity and prevent unauthorized access.
- 11.5.1. The operating system(s) and the CMCS must provide **comprehensive access control**, including but not limited to:
- 11.5.1.1. **Password protection.**
 - 11.5.1.2. **Multi-factor authentication (MFA)** (e.g. biometric, token-based, or one-time passcodes).

11.5.1.3. **Role-based access controls (RBAC)**

11.5.2. All programs and critical data files must be accessible **only to authorized personnel**, using secure authentication mechanisms.

11.5.3. Passwords, PINs, and other authentication credentials must be **stored in encrypted form**, using industry-standard encryption protocols.

11.5.4. A system utility or program must be available to:

11.5.4.1. **List all registered users.**

11.5.4.2. Display each user's **privilege level** on both the operating system and the CMCS.

11.5.4.3. Log **authentication attempts and access history.**

11.6. **Access by the Board** - Licensees must ensure that the Board has unrestricted, secure, and real-time access to the CMCS for audit, oversight, and data interrogation purposes, whether remotely or on-site.

11.6.1. The Board shall be able to access the CMCS at any time via:

11.6.1.1. A secure **electronic link** to the Board, or

11.6.1.2. A designated **facility on the operator's site.**

11.6.2. The CMCS must provide **comprehensive search mechanisms** to examine events and statistical data using multiple search keys, including:

11.6.2.1. Date

11.6.2.2. Time

11.6.2.3. Event number

11.6.2.4. Machine/terminal number

11.6.2.5. Combinations thereof

11.6.3. The Board must be able to log onto the CMCS to execute external audit and interrogation programs.

11.6.4. Board officers and inspectors must be granted **read-only access** to all data via secure credentials.

11.7. **User Interface, Documentation and Reporting** - Licensees must ensure that significant event and statistical data are transferred to the Board at intervals and in formats specified by the Board, using secure and approved methods.

11.7.1. Significant event and statistical data required by the Board must be **transferred at intervals** determined by the Board.

11.7.2. Permitted data transfer methodologies may include:

11.7.2.1. Hard copy report via courier or other similar means.

11.7.2.2. Dial-up data transfer.

11.7.2.3. Secure email.

11.7.2.4. Data transfer via dedicated link.

11.7.3. The **format of the data** will be specified by the Board and may be updated from time to time.

11.8. Link to Board's Computing Facilities - Licensees must provide and maintain secure electronic links between their CMCS and the Board's computing facilities, including all necessary hardware, software, and training.

11.8.1. The CMCS operator must provide and maintain, at its own cost, an **electronic link** between the Board and its central computing facilities as required.

11.8.2. The link must include all necessary equipment, such as:

11.8.2.1. Lightning protection.

11.8.2.2. Computer terminals.

11.8.2.3. Telkom or other accredited telecom lines.

11.8.2.4. NTUs, routers, modems, etc.

11.8.3. The operator must supply:

11.8.3.1. Required **software and electronic links**.

11.8.3.2. **Training** to enable Board personnel to access and operate the CMCS.

11.8.4. The link must allow:

11.8.4.1. **Interactive login** to the CMCS.

11.8.4.2. **Data downloads** at frequencies specified by the Board.

11.8.5. The operator must ensure **communications and systems security** to the satisfaction of the Board.

11.9. Facilities for Inspectors - Licensees must ensure that the CMCS includes dedicated functionalities to support Board personnel in performing field and system-level audits. Facilities within the CMCS must include:

11.9.1. Ability to determine **operational software version levels** and record operational hardware.

11.9.2. Ability to verify that **gambling machines and devices are online**.

11.9.3. Functional support for **inspectors working in the field**.