

Apollo Gaming Ltd.

BR-SPA — Brazil SPA — Compliance Pack

Operator ID: OP-APOLLO
Audit period: rolling 30 days to 2026-05-27
Generated: 2026-05-27T23:59:57.074Z
Generated by: RightWay.ai (in-app export)

Aligned to:

- Lei 14.790/2023 — Brazilian fixed-odds betting + online games regulation
- Portaria SPA/MF series (Q1-Q2 2026 amendments)
- SIGAP transaction reporting interface specification
- COAF/UIF (Lei 9.613/1998) suspicious transaction communications

Executive summary

9 control evaluations across 9 encoded BR-SPA controls. 3 passing (33%), 5 failing, 1 stale-evidence.

43 open findings: 1 critical, 40 high. 41 require immediate remediation before any scheduled regulator inspection.

WARNING: 1 critical finding would likely fail this audit if presented today.

Control register (latest evaluation per control)

Control ID	Title	Status	Last evaluated
BR.SPA.LICENCE.1	Federal SPA authorisation for fixed-odd...	pass	<1h ago
BR.SPA.CPF_KYC.1	CPF verification + biometric/facial mat...	pass	<1h ago
BR.SPA.SE.1	Self-exclusion register (national, cros...	pass	<1h ago
BR.SPA.PIX.PAYMENT.1	Player-owned account: Pix/transfer must...	fail	<1h ago
BR.SPA.NO_CREDIT.1	Credit card payments prohibited for wag...	fail	<1h ago
BR.SPA.BONUS.1	Bonuses with wagering requirements clea...	stale_evidence	1d ago
BR.SPA.REPORTING.1	SIGAP transaction reporting in real time	fail	<1h ago
BR.SPA.RG.LIMITS.1	Player-set deposit and time limits	fail	<1h ago
BR.SPA.AML.COAF.1	Suspicious activity reporting to COAF/U...	fail	2d ago

Mapped to Brazil SPA — Compliance Pack

Authorisation + capital requirements (Lei 14.790)

1/1 controls passing, 0 of high+critical concern

Player identification — CPF + biometric

1/1 controls passing, 0 of high+critical concern

Responsible gambling + national self-exclusion

1/2 controls passing, 1 of high+critical concern

Payment methods — Pix matching + credit-card prohibition

0/2 controls passing, 2 of high+critical concern

SIGAP transaction reporting

0/1 controls passing, 1 of high+critical concern

AML — COAF/UIF communications

0/2 controls passing, 2 of high+critical concern

Open findings (43)

[CRITICAL] BR.SPA.AML.COAF.1

Acceptance criterion failed: "filed_at <= 24h after MLRO decision" — 1/1 rows fail

Affected: EV-001

[HIGH] BR.SPA.PIX.PAYMENT.1

Acceptance criterion failed: "matched = true for 100% of accepted transactions" — no evidence rows returned by connector

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[HIGH] BR.SPA.NO_CREDIT.1

Acceptance criterion failed: "method not in [credit_card]" — no evidence rows returned by connector

[HIGH] BR.SPA.REPORTING.1

Acceptance criterion failed: "sent_at - occurred_at <= 30s for 99%" — no evidence rows returned by connector

[HIGH] BR.SPA.RG.LIMITS.1

Acceptance criterion failed: "limits available in account preferences" — no evidence rows returned by connector

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[MEDIUM] BR.SPA.BONUS.1

Acceptance criterion failed: "additional_deposit_required = false" — no evidence rows returned by connector

[MEDIUM] BR.SPA.BONUS.1

Acceptance criterion failed: "wagering_x and expiry_days disclosed" — no evidence rows returned by connector

Evidence integrity statement

Every evaluation in this pack is backed by a tamper-evident evidence record. Each record carries a SHA-256 Merkle root over its fields and is chained to the previous record via SHA-256(`prev_chain_hash || record_root`). Any modification to any historical evidence record will break the chain at that point and be detected on verification.

Ledger chain head: `707cfe83e6f3fde2e18c32288702a6b6c77f3fa64040a448670e032d3b97cb22`

Last appended: `2026-05-27T23:59:54.740Z`

An independent verifier may request a Merkle proof for any specific field of any specific evidence record without disclosure of the full record. See [RightWay.ai operator portal — Engineering Decision 1 \(plan v3.0\)](#).