

Apollo Gaming Ltd.

CA-ON-AGCO — AGCO Ontario — Registrar's Standards Self-Assessment

Operator ID: OP-APOLLO
Audit period: rolling 30 days to 2026-05-28
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Aligned to:

- AGCO Registrar's Standards for Internet Gaming
- iGaming Ontario Operating Agreement reporting schedule
- FINTRAC Proceeds of Crime (Money Laundering) + Terrorist Financing Act reporting
- AGCO Standard 2 (Game Integrity), Standard 3 (Responsible Gambling), Standard 5 (Information Security)

Executive summary

7 control evaluations across 7 encoded CA-ON-AGCO controls. 4 passing (57%), 3 failing, 0 stale-evidence.

31 open findings: 10 critical, 20 high. 30 require immediate remediation before any scheduled regulator inspection.

WARNING: 10 critical findings would likely fail this audit if presented today.

Control register (latest evaluation per control)

Control ID	Title	Status	Last evaluated
CA.ON.AGCO.STD.1.19	Self-exclusion across iGO operators (ce...	pass	<1h ago
CA.ON.AGCO.STD.2.GAME.1	Game certification by AGCO-recognised I...	pass	2d ago
CA.ON.AGCO.STD.3.RG.1	Mandatory deposit-limit prompt, time-ou...	fail	<1h ago
CA.ON.AGCO.STD.4.AML.1	FINTRAC reporting (LCTR, STR, EFT)	pass	3d ago
CA.ON.AGCO.IGO.REPORTING.1	iGO operating reporting (Player liabili...	pass	3d ago
CA.ON.AGCO.STD.6.MARKETING.1	No use of athletes as endorsers (active...	fail	1d ago
CA.ON.AGCO.STD.LOCATION.1	Player physically in Ontario at wager t...	fail	<1h ago

Mapped to AGCO Ontario — Registrar's Standards Self-Assessment

Standard 1.19 — Self-exclusion (centralised)

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

Standard 2 — Game integrity + certification

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

Standard 3 — Responsible gambling tools

0/1 controls passing, 2 of high+critical concern

Standard 4 — AML/CTF + FINTRAC reporting

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

Standard 6 — Advertising + marketing

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

iGO operating agreement — Reporting

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

Geo-restriction (Ontario territory)

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

Open findings (31)

[CRITICAL] CA.ON.AGCO.STD.LOCATION.1

Acceptance criterion failed: "in_on = true for 100% of wagers" — no evidence rows returned by connector

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[HIGH] CA.ON.AGCO.STD.3.RG.1

Acceptance criterion failed: "deposit_limit_offered = true at registration" — no evidence rows returned by connector

[HIGH] CA.ON.AGCO.STD.3.RG.1

Acceptance criterion failed: "time_out_available = true" — no evidence rows returned by connector

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[MEDIUM] CA.ON.AGCO.STD.6.MARKETING.1

Marketing creative C-2026-118 (Twitter campaign starting next Monday) features active NHL player — flagged by automated talent review but not yet legal-reviewed.

Affected: C-2026-118

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).