

Apollo Gaming Ltd.

MGA — MGA System Audit Checklist

Operator ID: OP-APOLLO

Audit period: rolling 30 days to 2026-05-27

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Generated by: RightWay.ai (in-app export)

Aligned to:

- MGA Player Protection Directive (Directive 3 of 2018)
- MGA System Audit Checklist (revised)
- MGA Suitability + Compliance Audit Requirements
- FIAU AML/CFT Implementing Procedures (Part II)

Executive summary

12 control evaluations across 12 encoded MGA controls. 5 passing (42%), 7 failing, 0 stale-evidence.

22 open findings: 9 critical, 12 high. 21 require immediate remediation before any scheduled regulator inspection.

WARNING: 9 critical findings would likely fail this audit if presented today.

Control register (latest evaluation per control)

Control ID	Title	Status	Last evaluated
MGA.PPD.AGE.1	Age verification before deposit / play	fail	<1h ago
MGA.PPD.SE.1	Self-exclusion: minimum 6 months, effec...	pass	<1h ago
MGA.PPD.DL.1	Deposit limit offered before first depo...	fail	<1h ago
MGA.PPD.RG.SESSION.1	Session reminder and net-position displ...	pass	<1h ago
MGA.AML.SR.1	Suspicious activity reporting to FIAU	pass	13d ago
MGA.AML.CDD.1	Enhanced Due Diligence for PEPs and hig...	pass	6d ago
MGA.GAME.RNG.1	RNG certification freshness — under 3 y...	fail	12d ago
MGA.PPD.MARKETING.1	No marketing to self-excluded or under-...	fail	6d ago
MGA.OPS.STAFF.AML_TRAINING_1	Annual AML training completion for rele...	fail	7d ago
MGA.PPD.INTERACTION.1	Documented player interaction following...	fail	3d ago
MGA.OPS.AUDIT.SYS.1	Annual System Audit by approved auditor	fail	7d ago
MGA.OPS.PLAYER_FUNDS.1	Player funds segregation from operation...	pass	8d ago

Mapped to MGA System Audit Checklist

PPD §2 — Deposit limits

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

PPD §3 — Self-exclusion

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

PPD §4 — Age verification + KYC

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

PPD §5 — Session limits + reality checks

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

AML — FIAU Implementing Procedures

2/3 controls passing, 1 of high+critical concern

Game integrity — RNG certification

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

Marketing — Commercial Communications Regulations

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

System audit + player funds

1/3 controls passing, 1 of high+critical concern

Open findings (22)

[CRITICAL] MGA.PPD.AGE.1

Acceptance criterion failed: "no successful deposits before dob_verified_at" — expected empty set; got 1 rows

Affected: P-0001

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[CRITICAL] MGA.GAME.RNG.1

RNG certificate expired for 2 games in production: slot-thunder-zeus-v2 (eCOGRA cert expired 2026-04-12), slot-aphrodite-fortune (GLI cert expired 2026-05-08). MGA System Audit (Q4 2025) flagged this category in section 5.2.

Affected: slot-thunder-zeus-v2, slot-aphrodite-fortune

Owner: James O'Connor (CTO)

[CRITICAL] MGA.PPD.AGE.1

Acceptance criterion failed: "no successful deposits before dob_verified_at" — expected empty set; got 1 rows

Affected: P-0001

[HIGH] MGA.PPD.DL.1

Acceptance criterion failed: "limit_offered_at < first_deposit_at for 100% of players" — 1/1 rows fail

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Acceptance criterion failed: "limit_offered_at < first_deposit_at for 100% of players" — 1/1 rows fail
Affected: P-0001

[HIGH] MGA.PPD.MARKETING.1

Acceptance criterion failed: "0 sends to self_excluded_at_send = true" — expected empty set; got 1 rows
Affected: P-0001

[HIGH] MGA.PPD.MARKETING.1

Acceptance criterion failed: "0 sends to age_at_send < 18" — expected empty set; got 1 rows
Affected: P-0001

[HIGH] MGA.OPS.AUDIT.SYS.1

Acceptance criterion failed: "filed_at <= fiscal_year_end + 90 days" — 1/1 rows fail
Affected: {"fiscal_year":2025,"auditor":"FACT Technologies","filed_at"

[HIGH] MGA.PPD.INTERACTION.1

Markers-of-harm Zendesk auto-tickets disabled in production since 2026-05-22 (commit 8a3f44c). 12 RG-marker events have no matching interaction ticket in the last 72 hours.
Affected: P-019501, P-019502, P-019615, P-019702

[HIGH] MGA.PPD.DL.1

Acceptance criterion failed: "limit_offered_at < first_deposit_at for 100% of players" — 1/1 rows fail
Affected: P-0001

[MEDIUM] MGA.OPS.STAFF.AML_TRAINING.1

3 staff in scope-required roles overdue on annual AML training: 1 Payments analyst (last trained 14 months ago), 2 Customer Support seniors (15 months, 13 months).
Affected: E-0049, E-0114, E-0142

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: `b9706e7f987c97c2333df09f5321a48fbe1c9e92a949a4703dccf7e5a7f21a87`

Last appended: `2026-05-27T23:57:54.682Z`

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 \(plan v3.0\)](#).