

Apollo Gaming Ltd.

UKGC — UKGC Annual Assurance Statement + RTS Annex A

Operator ID: OP-APOLLO

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

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Aligned to:

- UKGC Licence Conditions and Codes of Practice (LCCP) — Social Responsibility Code + Ordinary Code
- Remote Technical Standards (RTS) — Annex A control register
- UKGC Annual Assurance Statement, Section 122 enquiry response
- LCCP 1.1.2 record-keeping (7-year evidence retention)

Executive summary

19 control evaluations across 19 encoded UKGC controls. 16 passing (84%), 2 failing, 1 stale-evidence.

12 open findings: 9 critical, 2 high. 11 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
UKGC.LCCP.SR.3.4.1	Customer interaction with players exhib...	pass	<1h ago
UKGC.LCCP.SR.3.5.1	GAMSTOP integration for national multi-...	pass	<1h ago
UKGC.LCCP.SR.3.5.3	Time-out facility (24h, 7d, 30d, 6w)	pass	<1h ago
UKGC.LCCP.SR.2.1	AML risk assessment + customer due dili...	pass	9d ago
UKGC.RTS.2A	Customer-led deposit limits, applied wi...	pass	<1h ago
UKGC.RTS.3	Display net position and session time t...	pass	<1h ago
UKGC.RTS.7A	RNG certification and game-cycle integr...	pass	10d ago
UKGC.RTS.12	Game rules, RTP, and house edge disclos...	pass	10d ago
UKGC.RTS.14	Slot design: no autoplay, max 2.5s spin...	pass	11d ago
UKGC.LCCP.5.1.6	Marketing: bonus T&Cs clear, no mislead...	pass	11d ago
UKGC.LCCP.15	Regulatory Returns filed on time (quart...	stale_evidence	11d ago
UKGC.LCCP.AFFORDABILITY.1	Financial vulnerability checks at £125 ...	fail	1d ago
UKGC.LCCP.SCV.1	Participate in Single Customer View (SC...	pass	11d ago
UKGC.LCCP.SR.3.5.4	GAMSTOP sync — sync_status must be 'ok'...	pass	<1h ago
UKGC.LCCP.SR.3.5.5	Recent GAMSTOP exclusions must be block...	pass	<1h ago
SPORTSBOOK.LIMITS.UKGC.AC.1	Affordability checks at £125 net-loss-p...	pass	12d ago
SPORTSBOOK.MARKETING.UKGC.CAP1	No marketing of sports betting to under...	pass	13d ago
SPORTSBOOK.RG.UKGC.SR.			

In-play loss-chasing intervention promp...

pass

<1h ago

SPORTSBOOK.PAYMENT.CR Credit card deposits blocked
EDIT.UKGC.1

fail

<1h ago

Mapped to UKGC Annual Assurance Statement + RTS Annex A

LCCP SR Code 2 — AML / CTF

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

LCCP SR Code 3 — Customer interaction + self-exclusion

5/5 controls passing, 0 of high+critical concern

LCCP SR Code 5 / 15 — Marketing + regulatory returns

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

RTS Annex A §2-3 — Financial limits + session info

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

RTS Annex A §7 — RNG + game fairness

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

RTS Annex A §12-14 — Customer information + responsible product design

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

Affordability + Single Customer View (post-White Paper)

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

Open findings (12)

[CRITICAL] SPORTSBOOK.PAYMENT.CREDIT.UKGC.1

Acceptance criterion failed: "no deposit_id has funding_type=credit_card with status=accepted" — expected empty set; got 1 rows
Affected: {"note":"mock rows for query=deposit_funding_audit"}

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[CRITICAL] UKGC.LCCP.SR.3.5.1

GAMSTOP sync stale — last successful sync 31 hours ago (threshold 24h). 2 newly-listed customers may have placed bets between the missed sync and now.

Affected: P-018372, P-021554

Owner: Sarah Mitchell (Head of Compliance)

[CRITICAL] SPORTSBOOK.PAYMENT.CREDIT.UKGC.1

Acceptance criterion failed: "no deposit_id has funding_type=credit_card with status=accepted" — expected empty set; got 1 rows
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[HIGH] UKGC.LCCP.AFFORDABILITY.1

Affordability check not performed within 24h for 1 customer who crossed £500 net-loss threshold 31 hours ago. Customer P-019887 has continued to deposit since trigger.

Affected: P-019887

[HIGH] UKGC.LCCP.SR.3.4.1

5 high-severity safer-gambling markers triggered in last 30 days without documented customer interaction within the 24h SLA. Affected: P-014501 (chasing losses), P-016002 (late-night session 4h+), P-017889 (deposit velocity spike), P-018440 (cancelled withdrawal), P-019112 (3 deposit-limit increases in 7d).

Affected: P-014501, P-016002, P-017889, P-018440, P-019112

Owner: Sarah Mitchell (Head of Compliance)

[MEDIUM] UKGC.LCCP.15

Acceptance criterion failed: "filed_at <= deadline for every quarter" — 1/1 rows fail

Affected: {"period":"2026-Q1","filed_at":"2026-04-12T00:00:00Z","ggy_r

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