

POLICY Review

Reviewer	Luca Camilleri
Date	05 March 2026
Approved by	

Report on the review of application number CGA/2025/2436/1288

Reviewer's opinion:

The report gives an overview Apollo Sync B.V. policies uploaded during LOK license application. This review is based on the CGA checklist as established during license application.

Basis for the opinion:

The reviewer has tried to gather all possible evidence whilst doing the review and remained independent from any external influence.

All evidence has been saved on the attached documents hereafter.

Emphasis of Matter:

The policies reviewed are as follows:

AML Policy

KYC Policy

Responsible Gaming Policy

Player Complaints Policy

Information Security Policy

AML Policy

Title	Description	Instruction	Criticality	Comments
Signature of CC and Managing director	Is the document signed by the Compliance officer and Managing Director?	The policy must be signed by the Compliance officer and managing director of the applicant	4	No - signed by the Managing Director only
Responsible office	Does it identify the office responsible for Dissemination updates and review of the policy?	The policy must identify the office responsible for Dissemination updates and review of the policy	4	No
Version Control	Does it show the date the policy or revision takes effect?	The policy must indicate the date of the policy issue and/or latest revision	6	Yes
Periodic Review	Does it indicate whether or not the policy will be reviewed and how often?	The policy must state that it will be reviewed periodically, at minimum, once a year	6	No
General Policy Statement	A clear and concise statement of the Company's commitment regarding the policy's subject matter, including its scope and applicability.	The policy must include a concise statement of the company's commitment regarding the policy's subject matter, including its scope and applicability	9	Yes
Purpose	Explain the rationale for the policy, including any legal, regulatory, or business requirements it addresses.	The policy must state the rationale for the policy, including any legal, regulatory, or business requirements it addresses	9	Yes
Audience	Identify the stakeholders affected by the policy, such as "All employees," "Subcontractors," or "Third-party suppliers."	The policy must identify the stakeholders affected by the policy, such as "All employees," "Subcontractors," or "Third-party suppliers."	8	Yes
Definitions	Define key terms with specialized meanings relevant to the policy.	The policy must define any key terms with specialized meaning relevant to the policy	8	Yes
Legal Framework	Reference Curaçao laws: LOK, NORUT, NOIS, CGA Guidelines, Sanctions Ordinance, Criminal Code	The policy must make reference to Curaçao laws, specifically the following: LOK, NORUT, NOIS, CGA Guidelines, Sanctions Ordinance, Criminal Code	8	No - not all laws referenced, namely: LOK, CGA Guidelines, Sanctions Ordinance and Criminal Code.
Policy Implementation	Outline how the policy will be carried out, including key responsibilities and any necessary procedures. Use subheadings for clarity. If procedures are documented separately, specify the responsible department for oversight.	The policy must outline how it will be carried out, including key responsibilities and any necessary procedures, using subheadings for clarity. If procedures are documented separately, specify the responsible department for oversight.	9	Yes
Business Risk Assessment (BRA)	Conduct a comprehensive risk assessment of business operations; Outline business risk assessment carried out to identify the ML/TF risks you are exposed to and ensure that the policies, controls and procedures adopted are adequate to prevent and mitigate those risks. The risk assessment should address the ways in which the casino's products and services, type of customers, delivery channels and geographical factors could be used to launder money, finance terrorism and finance proliferation, and the extent of the risk that this will happen. In this respect the casino should indicate risk it is prepared to accept. Furthermore, it should indicate how effectiveness of the measures to mitigate risks are monitored and improved. Revision of the BRA should happen whenever changes occur to the operating environment, otherwise once a year. The BRA should be documented and approved by management. Technological development risk assessment should be carried out prior to launch of new products, business practices, delivery mechanism or new technologies.	The operator must conduct a comprehensive risk assessment of business operations which is to be included in the AML Policy. This should outline the assessment carried out to identify the ML/TF risks the operator is exposed to and ensure that the policies, controls and procedures adopted are adequate to prevent and mitigate those risks. The risk assessment should address the ways in which the casino's products and services, type of customers, delivery channels and geographical factors could be used to launder money, finance terrorism and finance proliferation, and the extent of the risk that this will happen. In this respect the casino should indicate risk it is prepared to accept. Furthermore, it should indicate how effectiveness of the measures to mitigate risks are monitored and improved. Revision of the BRA should happen whenever changes occur to the operating environment, otherwise once a year. The BRA should be documented and approved by management. Technological development risk assessment should be carried out prior to launch of new products, business practices, delivery mechanism or new technologies.	9	No

Customer Risk Assessment (CRA)	The Customer Risk Assessment will assess the particular risks the casino will be exposed to when providing its services or products to players. The information collected to draw up the CRA will formulate the customer's risk profile. The customer specific risk assessment has to be carried out during establishing a business relationship. The categories follow from the BRA	The operator must conduct a Customer Risk Assessment which will assess the particular risks the casino will be exposed to when providing its services or products to players. The information collected to draw up the CRA will formulate the customer's risk profile. The customer specific risk assessment has to be carried out during establishing a business relationship. The categories follow from the BRA.	9	Yes
Customer Acceptance Policy	On the basis of the CRA, the proper level of CDD can then be applied as stipulated in the Customer Acceptance Policy (CAP). When drawing up its CAP the casino has to comply with its obligations with regard to Politically Exposed Persons (PEP) and Sanctions Screening. The CAP should address the type of players that pose higher than average risk and also indicate the circumstances under which a player is denied.	On the basis of the CRA, the AML & KYC Policy must include a Customer Acceptance Policy, on which the proper level of CDD can then be applied. When drawing up its CAP the casino has to comply with its obligations with regard to Politically Exposed Persons (PEP) and Sanctions Screening. The CAP should address the type of players that pose higher than average risk and also indicate the circumstances under which a player is denied.	9	Yes
Customer Due Diligence (CDD) (XCG 4000 threshold)	Describe timing and which measures are used for customer due diligence including PEP and sanction screening. Further describe the actions taken when XCG 4,000 is reached, but not all documents have been submitted by the player. Describe what happens if the requested information is still not received within 30 days of reaching the threshold. Describe the process if the business relationship needs to be terminated. Describe the timing of ongoing sanctions screening (UN and EU list) and the procedure followed for freezing of funds and reporting to competent authorities in Curacao. Describe how threshold is calculated.	The policy must describe timing and which measures are used for customer due diligence including PEP and sanction screening. Further describe the actions taken when XCG 4,000 is reached, but not all documents have been submitted by the player. Describe what happens if the requested information is still not received within 30 days of reaching the threshold. Describe the process if the business relationship needs to be terminated. Describe the timing of ongoing sanctions screening (UN and EU list) and the procedure followed for freezing of funds and reporting to competent authorities in Curacao. Describe how threshold is calculated.	9	No - threshold approach is present but refers to EUR 2,000 and no mention of timing.
Ongoing Monitoring	Describe the measures employed for ongoing monitoring of customers identity and transactions	The policy must describe the measures employed for ongoing monitoring of customers identity and transactions.	9	Yes
Reliance on third parties to perform customer due diligence	Describe if the operator relies on third parties for CDD and how that is arranged	The policy must describe if the operator relies on third parties for CDD and how that is arranged.	9	N/A
Crypto Policy	Define rules and risk controls around virtual assets and crypto usage	The policy must define the rules and risk controls around virtual assets and crypto usage.	9	No - as per OGLAF, operator accepts USDT.
Transaction Monitoring	Set automated triggers for suspicious transaction patterns. Analyze patterns to detect structuring or other suspicious behavior	The policy must define the set automated triggers for suspicious transaction patterns and how the operator analyzes patterns to detect structuring or other suspicious behaviour.	9	No
Record Keeping	Retain records of CDD, transactions, and UTR (objective and subjective) for 5 years	The policy must state that the operator retains records of CDD, transactions, and UTR (objective and subjective) for at least 5 years.	9	Yes
Reporting to FIU Curaçao (XCG 5000)	Describe the process in place to recognize and report unusual transactions to the Curacao FIU when threshold of XCG 5000 is reached. Please note the prohibition to disclose a report filed to the FIU. The record keeping requirements for CDD information and transactions needs to be described. Describe how to calculate threshold.	The policy must describe the process in place to recognise and report unusual transactions to the Curacao FIU when the threshold of XCG 5,000 is reached. It is important to note the prohibition to disclose a report filed to the FIU. The record keeping requirements for CDD information and transactions also need to be described.	9	No - SAR section included however threshold of XCG 5,000 not mentioned.
Compliance with Internal Policy	Describe the risks and potential consequences of violating the policy, including disciplinary actions, legal implications, or business risks. All staff confirm awareness and compliance with AML policy	The policy must describe the risks and potential consequences of violating the policy, including disciplinary actions, legal implications, or business risks. All staff must confirm awareness and compliance with the AML policy.	8	Yes

Appointment of Compliance Officer	Assign a trained and independent AML Compliance Officer	The policy must assign a trained and independent AML Compliance Officer.	9	Yes - however CO not defined in the policy.
Independent Audit	Annual audit of AML program and internal controls	The policy must outline the annual audit plan of the AML program and internal controls.	8	Yes
Policy History/Policy Maintenance	Indicate whether this is a new policy or if it replaces an existing one. List previous versions with effective dates and revisions, if applicable.	The policy must indicate whether it is a new policy or if it supersedes an existing one. Previous versions must be listed with effective dates and revisions, if applicable.	8	No
Related Information	Provide links or references to related policies, legal or regulatory frameworks, guidelines, or relevant forms and templates.	The policy must provide links or references to related policies, legal or regulatory frameworks, guidelines, or relevant forms and templates.	8	Yes
Contact Information	For any questions regarding this policy, please contact: [Insert name and email address.]	The document must provide contact information for any questions regarding the policy which must include the name and email address of the designated contact person.	8	No
Policy URL (if applicable)	Indicate where the policy can be accessed online if published on the Company website.	The policy must indicate where the policy can be accessed online if published on the company website.	8	N/A

KYC Policy

Title	Description	Instruction	Criticality	Comments
Registered player	The policy must state that players who do not register themselves will not be allowed to play.	The policy must state that players who do not register themselves will not be allowed to play.	9	No
Registration procedure	The policy must set out the player registration procedure, including the information which will be requested from the players.	The policy must set out the player registration procedure, including the information which will be requested from the players.	9	Yes - in AML policy
CDD initiation	The policy must specify the point in time between the establishment of the business relationship and when the deposit threshold is met in which customer due diligence (CDD) will be initiated, and if it is undertaken upon the deposit threshold being met, the procedures shall indicate how the deposit threshold will be calculated.	The policy must specify the point in time between the establishment of the business relationship and when the deposit threshold is met in which customer due diligence (CDD) will be initiated, and if it is undertaken upon the deposit threshold being met, the procedures shall indicate how the deposit threshold will be calculated.	9	No
CDD procedure	The policy must set out the procedure to be adopted when conducting CDD.	The policy must set out the procedure to be adopted when conducting CDD.	9	Yes - in AML policy
Verification of player identity	The policy must outline the documentary evidence required for verification of a player's identity and residential address and specify that the evidence obtained for verification of residential address should not be more than 6 months old.	The policy must outline the documentary evidence required for verification of a player's identity and residential address and specify that the evidence obtained for verification of residential address should not be more than 6 months old.	9	Yes - in AML policy
Failure to complete CDD/KYC	The policy must outline the procedure that needs to be followed in instances where, following the lapse of 30 days from when the deposit threshold is met, the CDD/KYC identification and verification cannot be completed.	The policy must outline the procedure that needs to be followed in instances where, following the lapse of 30 days from when the deposit threshold is met, the CDD/KYC identification and verification cannot be completed.	9	No
Sanctions screening	The policy must provide for name screening against sanctions lists to be carried out prior to the onset of the business relationship and at determinate points in time afterwards, the procedure to be adopted in carrying out sanctions screening and the sources used for such purpose.	The policy must provide for name screening against sanctions lists to be carried out prior to the onset of the business relationship and at determinate points in time afterwards, the procedure to be adopted in carrying out sanctions screening and the sources used for such purpose.	9	Yes - in AML policy
PEP screening procedure	The policy must set out the procedure to be adopted in carrying out screening for PEP status, as well as the screening of existing customers for PEP status and the frequency of such checks on a risk-based approach.	The policy must set out the procedure to be adopted in carrying out screening for PEP status, as well as the screening of existing customers for PEP status and the frequency of such checks on a risk-based approach.	9	Yes - in AML policy
PEP status timeline	The policy must specify that screening for PEP status should be carried out within 30 days from when a player reaches the deposit threshold even if PEP screening would have already been carried out.	The policy must specify that screening for PEP status should be carried out within 30 days from when a player reaches the deposit threshold even if PEP screening would have already been carried out.	9	No
Identifying a PEP	The policy must explain the procedure that needs to be followed when a PEP is identified, including the procedure for obtaining senior management approval, establishing the player's source of wealth and, where applicable, their source of funds and conducting enhanced on-going monitoring of the customer's activity.	The policy must explain the procedure that needs to be followed when a PEP is identified, including the procedure for obtaining senior management approval, establishing the player's source of wealth and, where applicable, their source of funds and conducting enhanced on-going monitoring of the customer's activity.	9	Yes - in AML policy
Gathering information	The policy must set out the procedure to be followed and the sources which will be used to gather and obtain information on the Purpose and Intended Nature of the Business Relationship and build a business and risk profile for the different player risk categories.	The policy must set out the procedure to be followed and the sources which will be used to gather and obtain information on the Purpose and Intended Nature of the Business Relationship and build a business and risk profile for the different player risk categories.	9	Yes - in AML policy

Medium and High risk customers	The policy must specify the minimum information that shall be obtained on medium and high risk customers, including supporting evidence when it comes to high risk customers.	The policy must specify that as a minimum the following information on medium and high risk customers shall be obtained, including supporting evidence when it comes to high risk customers: (1) information on the nature of and details concerning the customer's business / occupation / employment (2) any other activity in addition to (1) above from which the customer derives his/her wealth (e.g., inheritance); (3) the expected source and origin of the funds to be used throughout the business relationship; and (4) the anticipated level and nature (including expected value and frequency of transactions) that is to be undertaken throughout the relationship.	9	No
Ongoing monitoring	The policy must lay down the procedure to be adopted to ensure that any player related documents, data or information held by the Licensee are reviewed and kept up-to-date.	The policy must lay down the procedure to be adopted to ensure that any player related documents, data or information held by the Licensee are reviewed and kept up-to-date.	9	No
Transaction monitoring	The policy must list the procedures and measures to be applied when carrying out scrutiny of transactions based on the level of customer risk, as well as the timing intervals to carry out the scrutiny of transactions based on the level of customer risk.	The policy must list the procedures and measures to be applied when carrying out scrutiny of transactions based on the level of customer risk, as well as the timing intervals to carry out the scrutiny of transactions based on the level of customer risk.	9	No
EDD scenarios	The policy must list the circumstances and scenarios in which enhanced due diligence (EDD) would need to be carried out. This shall include PEPs, high risk rated customers, customers linked to high risk and non-reputable jurisdictions and customers using multiple payment methods.	The policy must list the circumstances and scenarios in which enhanced due diligence (EDD) would need to be carried out. This shall include PEPs, high risk rated customers, customers linked to high risk and non-reputable jurisdictions and customers using multiple payment methods.	9	Yes - in AML policy

Responsible Gaming Policy

Title	Description	Instruction	Criticality	Comments
Registration form self-attestation	Registration form self-attestation	The player is required to self-attest their date of birth upon registration.	9	N/A
ID verification procedure	ID verification procedure	The RG policy must outline the procedure carried out by the operator to verify the player's age.	9	Yes
Account closure procedure	Account closure procedure upon the operator becoming aware that the player is a minor post-registration.	The RG policy must outline the procedure for post-registration account closure upon the operator becoming aware that the player is a minor.	9	No
Record-keeping	Record-keeping	The RG policy must state the operator's record-keeping policy.	9	No
RG page accessibility	RG page clearly identifiable and accessible	The site homepage must have a link to the RG page.	9	N/A
RG tools accessibility	Direct access to all RG tools	The player must be able to access all RG tools through their player account settings and/or the RG page.	9	N/A
Contacting the operator	Procedure on how the player can contact the operator regarding RG concerns via email or chat	The RG policy must describe the procedure for how the player can contact the operator regarding RG concerns via email or chat.	9	No
Language	Must be available in English and target market language	The RG page/policy must be available in English and the site's target market language.	9	Yes
Link to RG section	Clear and visible link to the RG section must be present on the homepage	The site homepage must have a link to the RG page.	9	N/A
RG reference in T&Cs	RG section reference on the T&Cs	The T&Cs must make reference to the RG section available on the site.	9	N/A
Information available to players	Players must be informed about the RG tools available	The T&Cs must inform the player about the RG tools available on the site.	9	N/A
Underage gambling visual	Visual Indication that under-age gambling is prohibited	The site footer must clearly display an "18+" sign.	9	N/A
Company details	Name and registered address of the license holder	The site footer must clearly identify the name and registered address of the licensed operator's Curacao registered entity.	9	N/A
License number	Official license number issued by the CGA	The site footer must clearly display the official license number issued by the CGA.	9	N/A
CGA's regulatory oversight	Statement confirming the regulatory oversight of the operations by the CGA	The site footer must clearly display a statement confirming the regulatory oversight of the operations by the CGA.	9	N/A
Link to RG section	Link to the RG section	The site footer must contain a link to the site's RG section.	9	N/A
CGA dynamic seal	The operator's CGA dynamic seal	The site footer must clearly display the CGA dynamic seal, in line with the instructions for the display of the dynamic seal.	9	N/A
Links to support resources	Direct link to gambling addiction support resources	The site footer must contain a direct link to gambling addiction support resources.	9	N/A
Player records	Players must be able to access a detailed record of their betting and wagering history	Players must be able to access a detailed record of their betting and wagering history through their player account.	9	N/A
Self-Assessment tools	Self-Assessment tools made available to players	Players must have access to self-assessment tools.	9	Yes
Vulnerable gamblers	RG policy should include a structured process on flagging potential vulnerable gamblers	The RG policy must include a structured process on flagging potential vulnerable gamblers.	9	No
Indicators of problem gambling	Must have a structured process for responding to indicators of problem gambling	The RG policy must contain a structured process for responding to indicators of problem gambling. The key monitoring factors include: - Deposit and wagering frequency - Repeated failed transactions due to insufficient funds - Reversing withdrawals - A pattern of inexplicable extended play sessions - Unreasonable increased communication with customer support, including requests for bonuses - Frequent changes to RG tools - Players maxing out a credit card - Attempts to open multiple accounts to bypass deposit or loss limits	9	No
Player profiling and Risk Assessment	Establish player profiles to assess risk levels	The RG policy must establish player profiles to assess risk levels	9	No
Monitoring and intervention	Adopt RBA to determine level of monitoring and intervention	The RG policy must adopt RBA to determine level of monitoring and intervention	9	No
Recording RG interactions	Record all RG interactions in PAM system	The RG policy must state that the operators records all RG interactions in the PAM system	9	No
Identification of vulnerable persons	Procedure to follow for players identified as vulnerable persons	The RG policy must define the procedure to be followed for players identified as vulnerable persons	9	No
Cooling-off period	Operator must offer players option to activate a cooling-off period	The operator must offer players the option to activate a cooling-off period	9	Yes
Cooling-off options	Options for cooling-off must include duration and marketing opt-out at minimum	The options for cooling-off may include Duration, brand, vertical and marketing, of which the duration and marketing opt-out are mandatory. Furthermore, the duration must be for a minimum of at least 24 hours	9	Yes

Self-Exclusion	Operator must offer players the option to self-exclude themselves for a duration of at least 1 year	Operator must offer players the option to self-exclude themselves for a duration of at least 1 year	9	Yes
Self-Exclusion applicability	Self-Exclusion must automatically exclude the player from all gambling activity	Self-Exclusion must automatically exclude the player from all gambling activity, including: - All brands/domains operated by the licensee; - All gaming verticals; - All marketing materials	9	Yes
Self-Exclusion procedure	Players must be able to initiate and complete the self-exclusion process fully online	Players must be able to initiate and complete the self-exclusion process fully online	9	N/A
Deposit Limits	Players must be able to set limits on the total amount they deposit	Players must be able to set limits on the total amount they deposit	9	Yes
Training and Staff Readiness	Operators must train customer service and Responsible Gaming staff to handle player interaction professionally and effectively	Training should cover, at least: - Recognizing signs of gambling distress - Conducting sensitive and structured conversations with at-risk players - Directing players to appropriate support resources and RG tools	9	Yes
Consumer Advertising and Marketing	Operators must not engage in irresponsible advertising	- No targeting of Vulnerable Groups - No portrayal of Gambling as an Investment - No misrepresentation of Skill vs Chance - No Emotional Manipulation - Marketing materials must not feature minors or depict them engaging with gambling content - No explicit content - No encouragement of Unrelated Harmful Behaviours - Bonuses and promotions must be communicated transparently - Operators must not use bonuses to encourage excessive gambling - Operator is responsible for materials provided to affiliates, representatives, sponsorships, ambassadors, social media influencers - Operator must make any contracted third-party aware of their RG policy - All advertising must include a clearly visible RG message or slogan	9	No
Internet Filtering Tools	The operator is advised to remind adults that they should take precautions when sharing devices with minors	The operator is advised to remind adults that they should take precautions when sharing devices with minors, such as safeguarding usernames, passwords and payment details.	2	No
Sharing links to third-party software	The operator may consider sharing links to third-party software that can help restrict access to gambling websites	The operator may consider sharing links to third-party software that can help restrict access to gambling websites. Examples that are available for website blocking include: - BetBlocker; betblocker.org - GamBlock; gamblock.com - Gamban; gamban.com	2	Yes
Notifications for concerning behaviours	Operators may employ automatic or manual pop-up notifications in response to concerning behaviours	Operators may employ automatic or manual pop-up notifications in response to concerning behaviours	4	No
Initiating direct contact	When a player exhibits behaviour that reasonably suggests they may be a Vulnerable Player, the operator must initiate direct contact	When a player exhibits behaviour that reasonably suggests they may be a Vulnerable Player, the operator must initiate direct contact	8	Yes
Other Limits	Other limits may be considered including loss limits, time limits or wager limits, in line with the operator's target player and/or market	Other limits may be considered including loss limits, time limits or wager limits, in line with the operator's target player and/or market	4	No
Reality Check	Reality check measures can be implemented without compromising the user experience, however, if used, they must be fit-for-purpose	Reality check measures can be implemented without compromising the user experience, however, if used, they must be fit-for-purpose and measures include: 1. Real-time session timer that remains visible at all times when the player is logged in; 2. Real-time clock in the player's time zone; 3. Periodic pop-up reminders or prompts about session duration; 4. Player-Activated Reality Checks which can be customized to activate at specific time intervals. Custom messages should clearly indicate how long the player has been playing and display the player's winnings and losses during that period.	4	Yes

Player Complaints Policy

Title	Description	Instruction	Criticality	Comments
Lodging a complaint	Players may lodge a complaint free of charge at any time up to six months of the settlement of the bet or the incident about which they are making a complaint	Players may lodge a complaint free of charge at any time up to six months of the settlement of the bet or the incident about which they are making a complaint.	9	Yes
Lodging a complaint (P2P)	In the case of P2P (such as poker) or ante post fixed odds betting the six month clock begins after the bet settlement or conclusion of a specific event rather than the placement of the wager after the bet settlement or conclusion of a specific event rather than the placement of the wager.	In the case of P2P (such as poker) or ante post fixed odds betting the six month clock begins after the bet settlement or conclusion of a specific event rather than the placement of the wager after the bet settlement or conclusion of a specific event rather than the placement of the wager.	9	Yes
Lodging a complaint (live betting)	In the case of complaints about in-running sports betting, customers must be advised that while they may submit a complaint within six months, prompt action may be necessary if the investigation may depend on data specific to the complaint which — due to the nature of in-running betting — may no longer be available after a short period, insofar as the operator cannot reasonably be expected to preserve such data any longer.	In the case of complaints about in-running sports betting, customers must be advised that while they may submit a complaint within six months, prompt action may be necessary if the investigation may depend on data specific to the complaint which — due to the nature of in-running betting.	9	No
Eligibility to make a complaint	Complaints can only be made by the registered player. Article 1.3 section c of the LOK mandates that a player is not allowed to sell, donate, rent out, lease, pawn, or pledge, under any title, any of their claims against the holder of a gaming license from the CGA.	The complaints procedure must state that complaints can only be made by the registered player.	9	No
Customer support	In the first instance the operator must offer customer support via email and/or live chat.	In the first instance the operator must offer customer support via email and/or live chat.	9	Yes
Complaint form	An official Complaint Submission Form must be available to the player.	An official Complaint Submission Form must be available to the player. a. This form must be either a downloadable form that can be completed and emailed or otherwise uploaded by the player, and/or a form that is fully completed and submitted online b. The form must include at a minimum the following sections i. Complainant's name, address, and place of residence. ii. Complainant's account number (if applicable) iii. Date of the complaint and date of the disputed event. iv. Description of the conduct being disputed (using a selection of predetermined category topics if/as applicable). c. The form must be available in English and in the language of the website/domain that the player is using. d. The operator may request supporting documentation the player requires to include as part of the complaint. Any additional information or documentation requested by the operator must be a reasonable in the context of complaint resolution.	9	N/A
Alternative Dispute Resolution	The operator must offer an ADR option for the players, subject to the requirements of Clause 5 of the Player Complaints Policy Guidelines.	The operator must offer an ADR option for the players, subject to the requirements of Clause 5 of the Player Complaints Policy Guidelines.	9	Yes
Legal action restrictions	Except if mutually agreed under specific terms of ADR (Clause 5 of the Player Complaints Policy Guideline), the operator must not restrict the rights of the player him/herself to take legal action.	Except if mutually agreed under specific terms of ADR (Clause 5 of the Player Complaints Policy Guideline), the operator must not restrict the rights of the player him/herself to take legal action.	9	Yes
Terms and Conditions	It is the responsibly of the operator to make the role of the CGA clear to the player in the Terms and Conditions.	It is the responsibly of the operator to make the role of the CGA clear to the player in the Terms and Conditions: 1. The CGA will not resolve or make decisions on any player complaints regarding gambling-related transactions on the operator's website(s). 2. Unless deemed to be inadequately handled, the decisions made by the operator and/or ADR provider will not be subject to reviewing and/or overturning by the CGA. 3. Notwithstanding 1. and 2. above, the operator must not restrict the player's ability to contact the CGA directly with regard to matters including but not limited to malpractice, breach of license conditions or whistleblowing. 4. While the CGA does not mediate in individual disputes, it will use the information to support its supervisory and enforcement actions.	9	N/A
Prioritizing RG-related complaints	Complaints related to responsible gaming should be prioritized due to potential impacts on player well-being. Complaints should be categorized as related to responsible gaming in any case when it regards targeting of Vulnerable Players, the availability and/or timely implementation of self-exclusion and/or cooling-off and the mandated consequences therein as outlined in the Responsible Gaming policy.	Complaints related to responsible gaming should be prioritized due to potential impacts on player well-being. Complaints should be categorized as related to responsible gaming in any case when it regards targeting of Vulnerable Players, the availability and/or timely implementation of self-exclusion and/or cooling-off and the mandated consequences therein as outlined in the Responsible Gaming policy.	9	Yes
Timeline for RG-related complaints	Operators must use best in efforts to resolve these cases within five business days.	Operators must use best in efforts to resolve these cases within five business days.	9	Yes
RG-related complaints process	Within two days of receiving a complaint, the operator must inform the player of the process that will be followed.	Within two days of receiving a complaint, the operator will: - Confirm receipt of the complaint in writing. - Provide an explanation of how the complaint will be processed. - Provide notice of the average timeline for resolution of such complaints.	9	Yes
Extension of timeline for RG-related complaints	If more time is needed by the operator to make a reasonable and informed decision, players must be informed of the delay, which cannot exceed two weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended by no more than a further two weeks.	If more time is needed by the operator to make a reasonable and informed decision, players must be informed of the delay, which cannot exceed two weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended by no more than a further two weeks.	9	Yes
Timeline for all other complaint types	The operator will assess and respond to complaints within four weeks. If necessary, due to complexity or lack of information, this period may be extended once by an additional four weeks, with prior written notice to the player.	The operator will assess and respond to complaints within four weeks. If necessary, due to complexity or lack of information, this period may be extended once by an additional four weeks, with prior written notice to the player.	9	Yes
Process for all other complaint types	Within one week of receiving a complaint, the operator will:	Within one week of receiving a complaint, the operator will: - Confirm receipt of the complaint in writing. - Provide an explanation of how the complaint will be processed. - Provide notice of the average timeline for resolution of such complaints.	9	Yes

Final determination letter	A player will always receive a final determination of their complaint in writing.	A player will always receive a final determination of their complaint in writing. The response will either be: 1. A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable. 2. Detailed reasons for not handling the complaint. If additional information is reasonably required to address the complaint fully, the operator must have requested this information within the initial four week time period. Should the complainant not provide the necessary within the initial four week time period, the operator may reject the complaint. 3. If the player is unsatisfied with the resolution and makes a further complaint to that effect, the player is informed that they may escalate the matter to an independent ADR entity.	9	Yes
Use of AI for complaints process	The use of AI is permissible under the Complaints Policy Guideline subject to the special terms.	The use of AI is permissible under this Complaints Policy Guideline subject to the following terms: 1. Once a player complaint has been identified as pertaining to Responsible Gaming (Clause 4.1), communications with the player should be conducted by a human, not AI. 2. Complaints that can be reasonable considered as complex should be dealt with by a human, not AI. 3. The AI records must be monitored to ensure that they are reasonable in their solutions/recommendations and consistent across players with like-for-like complaints.	9	N/A
Provision of ADR services	In order to be compliant with their license conditions as mandated by LOK, each licensed operator must offer independent ADR services to their players in accordance with the ADR Policy.	Each licensed operator must offer independent ADR services to their players in accordance with the ADR Policy, as mandated by LOK.	9	Yes
T&Cs inclusion	Full details of the ADR process must be included in the operator's Terms and Conditions.	The full details of the ADR process must be included in the operator's Terms and Conditions.	9	N/A
ADR agreement	Operators must have uploaded to the CGA Portal an agreement with at least one CGA Certified ADR entity, within one month of the publication of the Certified ADR Providers on the official website.	Operators must have uploaded to the CGA Portal an agreement with at least one CGA Certified ADR entity.	9	N/A
Escalation to ADR	If a complaint cannot be resolved internally, players are entitled to escalate the matter to an independent ADR provider, free of charge. For avoidance of doubt, the operator will bear all costs of the ADR process.	If a complaint cannot be resolved internally, the operator must provide players with an independent ADR service, of which the operator will bear all costs.	9	Yes
Recommending ADR process with a different entity	Once ADR process is completed it cannot be recommended by either the player or the operator with another different ADR entity.	Once ADR process is completed it cannot be recommended by either the player or the operator with another different ADR entity.	9	No
Recommending dropped ADR processes	In the event that the player drops out of the ADR process (but it has already begun) – it should be noted the player should not have the right to resurface the dispute in the future.	In the event that the player drops out of the ADR process (but it has already begun) – it should be noted the player should not have the right to resurface the dispute in the future.	9	No
Restrictions on ADR escalation	Provision of ADR services by the operator is mandatory. If the operator sets ADR parameters in order to prevent abuse (such as whether ADR must be undertaken before a player can initiate legal proceedings, the binding nature of the ADR outcome on the player, or whether there is a minimum claim value required for escalation to ADR), the CGA advises the operator to carefully consider these conditions and seek independent legal advice regarding any applicable civil legislation.	Provision of ADR services by the operator is mandatory. If the operator sets ADR parameters in order to prevent abuse (such as whether ADR must be undertaken before a player can initiate legal proceedings, the binding nature of the ADR outcome on the player, or whether there is a minimum claim value required for escalation to ADR), the CGA advises the operator to carefully consider these conditions and seek independent legal advice regarding any applicable civil legislation.	9	Yes
Periodic reporting	The operator will submit reports to the CGA on January 15th and June 15th based on complaints submitted to the operator since the previous reporting period by players using the Complaints Submission Form. The first reports become due in January 2026.	The policy must state that the operator will submit reports to the CGA on January 15th and June 15th based on complaints submitted to the operator since the previous reporting period by players using the Complaints Submission Form. The first reports become due in January 2026.	9	Yes
Report details	The report shall include the details as required by the Player Complaints Policy Guidelines.	The report will summarise the following: a. Total number of complaints made b. Total number of settled complaints (upheld and rejected) c. Number of pending or unresolved complaints d. Number of complaints by category e. Number referred to ADR f. Number and detail of complaints for which a player has taken legal action	9	No
Compliance with ADR decisions	The operator will ensure transparency and compliance with ADR decisions and regulatory updates.	The operator will ensure transparency and compliance with ADR decisions and regulatory updates.	9	No
Reporting requirements of the ADR	ADR service providers will have their own reporting requirements in accordance with the Alternative Dispute Resolution policy issued by the CGA.	ADR service providers will have their own reporting requirements in accordance with the Alternative Dispute Resolution policy issued by the CGA.	9	No
Record-Keeping of unresolved complaints	Records of unresolved complaints and/or complaints that have been escalated to ADR or legal proceedings will be kept for the lesser of five years or the relevant time stipulated by data protection, statute of limitations or other relevant laws or guidelines.	The operator will ensure that records of unresolved complaints and/or complaints that have been escalated to ADR or legal proceedings will be kept for the lesser of five years or the relevant time stipulated by data protection, statute of limitations or other relevant laws or guidelines.	9	Yes
CGA's right to access records	The CGA reserves the right to request, at any time, access to records of complaints received as well as any disputes that are pending resolution.	In light of the fact that the CGA reserves the right to request, at any time, access to records of complaints received as well as any disputes that are pending resolution, the operator shall ensure that such records are readily available at all times.	9	Yes

Complaints procedure	The Complaints procedure statement will be visible and accessible on the operator's website as a standalone link or document and clearly outlined in the Terms and Conditions	The Complaints procedure statement will be visible and accessible on the operator's website as a standalone link or document and clearly outlined in the Terms and Conditions. The information provided should include at minimum: 1. Links to customer service and information on how to contact the operator 2. Detail of information required for a player to make a complaint and links to either/both the online form or the downloadable PDF/Word document 3. Timelines for responses and resolution 4. Player rights to complain including explicit rights to ADR services and regulatory escalation 5. An explanation of the potential consequences of the relevant ADR entity's decision, and the manner in which this will affect the player's right to further legal and judicial recourse 6. Details of the ADR process and player rights 7. Contact information for the ADR provider(s) 8. Clear information that the CGA does not mediate individual disputes, but if the player feels the operator is in breach of regulations that the player may contact the CGA	9	Yes
Right to make a complaint	The player has the right to make a complaint regarding any part of their relationship with the operator, or any incident related to their participation in a game of chance	The player has the right to make a complaint regarding any part of their relationship with the operator, or any incident related to their participation in a game of chance. This includes (but is not limited to): 1. Deposit issues 2. Withdrawal issues 3. Bonus terms and conditions 4. Account closures or restrictions 5. Alleged errors or unfairness in game outcomes 6. Responsible gaming issues 7. Treatment of player balances 8. KYC and Verification 9. Data Protection 10. Technical or Software issues 11. AML concerns 12. Issues with minors 13. Fraudulent games 14. Fraudulent practices 15. License or regulation 16. Unfair terms and conditions	9	Yes

Information Security Policy

Title	Description	Criticality	Comments
ISP	Information Security Policy, including details about: <i>(Exempt if holding relevant ISO Certificate)</i>	9	Yes
Objectives	Information Security Purpose and Objectives <i>(Integrity, Confidentiality and Availability of information)</i> ;	9	Yes - Section 1
Data Classification	Data Confidentiality including Data Classification and Access Control Policy (outlining the levels of authority per role over data and systems);	9	Yes - Sections 6.3 and 6.4
Network Security	Network Security (Including Access Controls, Segregation and Security of Network Services);	9	Yes - Section 7
Security Awareness	Security awareness and behaviour including acceptable use policy, email/communication use policy and personal and mobile devices policy;	9	Yes - Sections 6.1 and 6.6
Training	Training, Responsibilities, rights and duties of personnel.	9	Yes - Section 6.6

It is essential that policies have not been tested on ongoing operations since the applicant is not live.

Luca Camilleri – 537194M

Review Date 05 March 2026