

INFORMATION REQUEST PACK

Acme Group

Topic: Everything

Period: 2026-04-01 to 2026-09-30

Generated 2026-09-30 16:20 UTC by Maria Reyes

Topic: Everything. Every record every other topic draws on.

Registers (obligations, suppliers, regulated individuals) are shown as they stand when this pack was generated.

Decisions, reviews and change-impact records are those dated inside the period. Evidence is what was held by the last day of the period.

A GAP marks a record that is missing: no evidence linked, an assessment not made, a recorded expiry passed. It describes the records held in this workspace; it is not an assessment of whether any requirement is met.

Suspicious activity reports are never included in a pack.

Contents

1.	Obligations and status	8 rows, 1 GAP
2.	Evidence held	10 rows
3.	Decisions and approvals in the period	8 rows
4.	Change-impact records in the period	2 rows
5.	Suppliers	4 rows, 1 GAP
6.	Regulated individuals	3 rows, 1 GAP
7.	CPD completed in the period	3 rows
8.	Regulated individuals: changes in the period	6 rows
9.	Sanctions screening set-up	2 rows
10.	Sanctions screening runs in the period	6 rows
11.	Sanctions list changes in the period	3 rows, 1 GAP
12.	Licences	2 rows
13.	Board minutes in the period	2 rows

Gaps (4)

GAP · Obligations: Acme Affiliates Ltd: no evidence linked to "Change of control notification and fee" (Sch. 4).

GAP · Suppliers: Northstar Hosting Ltd: licence position not examined.

GAP · Regulated individuals: Owen Clarke: no fit and proper evidence linked.

GAP · Sanctions screening: UN list change of 2026-09-26 ("UN Security Council list: designations added"): nobody has confirmed screening covered it.

GibComply is compliance management software, not legal advice. Nothing it shows is a determination or approval by the Gambling Authority or the Gambling Commissioner, and the records in it are entered by your team, not verified by GibComply. The licence holder remains responsible for meeting the Gambling Act 2025, and material regulatory questions belong with a qualified Gibraltar lawyer.

1. Obligations and status

Register rows for this topic as they stand at generation, with the evidence linked to each by the end of the period. A row with no evidence linked is a GAP. Rows marked "pending adviser review" come from obligation content an adviser has not yet reviewed.

ENTITY	OBLIGATION	CITATION	STATUS	EVIDENCE
Acme Affiliates Ltd	Access the consolidated list or an equivalent commercial list, with fuzzy matching; disclose and freeze on a match (pending adviser review)	aml-code-remote-2026 AML Code (Remote) §9.2	Evidenced	1 item
Acme Affiliates Ltd	Stay updated on sanctions list changes; cover sanctions in the risk assessment and staff training; report a positive link (pending adviser review)	aml-code-remote-2026 AML Code (Remote) §9.3	Under review	1 item
Acme Affiliates Ltd	Policies, controls and procedures to know the sanctions lists, check customers against them and act on a match (pending adviser review)	sanctions-act-2019 s.8A(1)	Evidenced	1 item
Acme Affiliates Ltd	Change of control notification and fee	LN.2026/065 Sch. 4	Unevidenced	GAP
Acme Affiliates Ltd	Sufficient substantive presence in Gibraltar	Gambling Act 2025 ss.39-40	Evidenced	2 items
Acme Studios Ltd	Access the consolidated list or an equivalent commercial list, with fuzzy matching; disclose and freeze on a match (pending adviser review)	aml-code-remote-2026 AML Code (Remote) §9.2	Evidenced	1 item
Acme Studios Ltd	Stay updated on sanctions list changes; cover sanctions in the risk assessment and staff training; report a positive link (pending adviser review)	aml-code-remote-2026 AML Code (Remote) §9.3	Under review	1 item
Acme Studios Ltd	Policies, controls and procedures to know the sanctions lists, check customers against them and act on a match (pending adviser review)	sanctions-act-2019 s.8A(1)	Evidenced	1 item

2. Evidence held

Every document held by the end of the period that this topic draws on, with when it was uploaded and by whom. The uploader of an evidence-vault document is read from the audit log. The fingerprint is the SHA-256 of the stored file, where one was recorded.

DOCUMENT	WHERE IT IS HELD	UPLOADED	UPLOADED BY	VALID UNTIL	SHA-256
Identity verification services agreement	Supplier Verifyly Ltd: Contract	2026-01-20	Maria Reyes	2027-12-31	36506-c024096...
Office lease, Europort, Acme Affiliates Ltd	Evidence vault: Office Lease (s.40)	2026-02-10	owen.clarke@acme.example	2029-01-31	7-d1c4336ada5...
Acme Affiliates Ltd board minutes, 12 March 2026: sanctions screening procedure v2.1 adopted	Evidence vault: Local Board Minutes	2026-03-13	maria.reyes@acme.example	No end date	2-d40b8f47180...
Hosting and managed services agreement	Supplier Northstar Hosting Ltd: Contract	2026-04-06	Owen Clarke	2027-04-05	5dfbf1707e59...
Marketing services agreement	Supplier Signalhouse Media Ltd: Contract	2026-05-21	Daniel Okafor	2027-05-20	4-e4c22d681f7...
Acme Studios Ltd board minutes, 18 June 2026: screening provider and name-matching settings recorded	Evidence vault: Local Board Minutes	2026-06-19	maria.reyes@acme.example	No end date	f6f484d4b033...
Employee roster, Q2 2026, Acme Affiliates Ltd	Evidence vault: Employee Roster (s.40)	2026-07-03	owen.clarke@acme.example	No end date	20-c9e85b84ca...
Beneficial ownership and control questionnaire	Supplier Verifyly Ltd: Due diligence	2026-07-08	Maria Reyes	No end date	9-c0e7ab7e7ba...
Payment processing agreement	Supplier PayRail Ltd: Contract	2026-08-12	Owen Clarke	2028-08-11	0-db0696909a6...
Payroll records, August 2026, Acme Affiliates Ltd	Evidence vault: Payroll Records (s.40)	2026-09-04	owen.clarke@acme.example	No end date	375868-be804a...

3. Decisions and approvals in the period

Status changes on this topic's obligations, supplier reviews and signed quarterly returns dated inside the period, oldest first, with who made them.

DATE	BY	RECORD	DECISION
2026-04-14	Owen Clarke	Acme Affiliates Ltd: Sufficient substantive presence in Gibraltar	Status Unevidenced to Evidenced
2026-06-19	Maria Reyes	Acme Studios Ltd: Policies, controls and procedures to know the sanctions lists, check customers against them and act on a match	Status Unevidenced to Evidenced
2026-06-19	Maria Reyes	Acme Studios Ltd: Access the consolidated list or an equivalent commercial list, with fuzzy matching; disclose and freeze on a match	Status Unevidenced to Evidenced
2026-07-08	maria.reyes@acme.example	Supplier review: Verifyly Ltd	No concerns recorded
2026-07-12	Owen Clarke	Quarterly return Q2 2026	Signed (SHA-256 79026a1fd5b9...)
2026-08-19	owen.clarke@acme.example	Supplier review: PayRail Ltd	Remediation required
2026-09-24	Maria Reyes	Acme Affiliates Ltd: Stay updated on sanctions list changes; cover sanctions in the risk assessment and staff training; report a positive link	Status Evidenced to Under review
2026-09-24	Maria Reyes	Acme Studios Ltd: Stay updated on sanctions list changes; cover sanctions in the risk assessment and staff training; report a positive link	Status Evidenced to Under review

4. Change-impact records in the period

Records created or signed inside the period that list at least one of this topic's obligations. A signed record is frozen; a draft is still being worked on.

CREATED	RECORD	TRIGGER	STATUS	SIGNED
2026-08-20	New payments supplier: PayRail Ltd	An operational change was logged	Draft	Not signed
2026-09-18	Code of Practice for the Remote Gambling Industry: Anti-Money Laundering, Countering the Financing of Terrorism and Counter Proliferation Financing Arrangements: 2 requirement changes	A legal instrument changed	Signed	Owen Clarke, 2026-09-24

5. Suppliers

Outsourcing Register suppliers for this topic as they stand at generation. The licence position is what the operator recorded, not a statement of any supplier's legal position. A supplier with no documents held, or whose licence position nobody has examined, is a GAP.

SUPPLIER	FUNCTION	STATUS	LICENCE POSITION (AS RECORDED)	DOCUMENTS
Northstar Hosting Ltd	Hosting	Active	Licence position not examined	1
PayRail Ltd	Payments	Active	Licence required, none recorded	1
Signalhouse Media Ltd	Marketing	Active	Licence required, application recorded	1
Verifyfy Ltd	Identity verification	Active	Licence position recorded	2

6. Regulated individuals

The register as it stands at generation. The status is what the operator recorded. An approval whose recorded expiry has passed by the end of the period, or with no expiry recorded, is a GAP; so is a person with no fit and proper evidence linked by the end of the period. Linked evidence means a document is held, not that it has been assessed.

NAME	REGULATED FUNCTION	STATUS (AS RECORDED)	GRANTED	EXPIRY	FIT AND PROPER EVIDENCE
Daniel Okafor	Managing Director	Assessment Pending	2026-04-01	2029-03-31	1 document
Maria Reyes	MLRO	Assessment Pending	2026-04-01	2029-03-31	1 document
Owen Clarke	Compliance Officer	Assessment Pending	2026-06-01	2029-05-31	GAP

7. CPD completed in the period

Continuing professional development the operator recorded for these individuals, completed inside the period.

COMPLETED	NAME	ACTIVITY	PROVIDER	TOPIC	HOURS
2026-05-14	Maria Reyes	Targeted financial sanctions: screening and freezing	Straits Compliance Training	AML / CFT	3
2026-06-10	Daniel Okafor	Directors under the Gambling Act 2025	Straits Compliance Training	Governance	2
2026-09-10	Owen Clarke	Sanctions list changes: rescreening in practice	Not recorded	AML / CFT	1.5

8. Regulated individuals: changes in the period

The register's own append-only history for the period: people added or removed, changes to function, status, dates or reference, and evidence or CPD recorded. It includes people since removed.

DATE	NAME	EVENT	DETAIL	BY
2026-04-20	Maria Reyes	Evidence linked	Fit and proper questionnaire, Maria Reyes (Fit and proper)	maria.reyes@acme.example
2026-04-22	Daniel Okafor	Evidence linked	Fit and proper questionnaire, Daniel Okafor (Fit and proper)	maria.reyes@acme.example
2026-05-14	Maria Reyes	CPD recorded	Targeted financial sanctions: screening and freezing, 3 hours, 2026-05-14	maria.reyes@acme.example
2026-06-01	Owen Clarke	Added to the register	Compliance Officer · Assessment Pending · expiry 2029-05-31	daniel.okafor@acme.example
2026-06-10	Daniel Okafor	CPD recorded	Directors under the Gambling Act 2025, 2 hours, 2026-06-10	daniel.okafor@acme.example
2026-09-10	Owen Clarke	CPD recorded	Sanctions list changes: rescreening in practice, 1.5 hours, 2026-09-10	owen.clarke@acme.example

9. Sanctions screening set-up

How the operator recorded that it screens customers against sanctions lists, and every change or review of that set-up up to the end of the period, newest first. GibComply does not screen anyone; this is what the operator recorded, and who signed it off.

RECORDED	ENTRY	PROVIDER OR TOOL	LISTS	FREQUEN- CY	RESCREEN TRIGGERS	SIGNED OFF BY
2026-09-02	Reviewed, un- changed	Verifyly Ltd screen- ing service	UK, EU, UN	Monthly	New customer registration; A sanctions list is updated; Periodic full rescreen of the customer base	Maria Reyes
2026-03-30	Set-up record- ed	Verifyly Ltd screen- ing service	UK, EU, UN	Monthly	New customer registration; A sanctions list is updated; Periodic full rescreen of the customer base	Maria Reyes

10. Sanctions screening runs in the period

Screening runs dated inside the period, with the lists each covered and the proof file held. A run with no recorded proof fingerprint shows "Not recorded".

RUN DATE	LISTS COVERED	POPULATION	PROOF FILE	SHA-256	RECORDED BY	EVIDENCES
2026-04-15	UK, EU, UN	Full customer database	verifyly-rescreen-summary-2026-04-15.pdf	b170affc481a...	maria.reyes@acme.example	Acme Affiliates Ltd: Access the consolidated list or an equivalent commercial list, with fuzzy matching; disclose and freeze on a match
2026-05-15	UK, EU, UN	Full customer database	verifyly-rescreen-summary-2026-05-15.pdf	13482-f7fa6eb...	maria.reyes@acme.example	Acme Affiliates Ltd: Access the consolidated list or an equivalent commercial list, with fuzzy matching; disclose and freeze on a match
2026-06-15	UK, EU, UN	Full customer database	verifyly-rescreen-summary-2026-06-15.pdf	f34121c0c5e5...	maria.reyes@acme.example	Acme Affiliates Ltd: Access the consolidated list or an equivalent commercial list, with fuzzy matching; disclose and freeze on a match
2026-07-15	UK, EU, UN	Full customer database	verifyly-rescreen-summary-2026-07-15.pdf	e290bcc0252d...	maria.reyes@acme.example	Acme Affiliates Ltd: Access the consolidated list or an equivalent commercial list, with fuzzy matching; disclose and freeze on a match
2026-08-14	UK, EU, UN	Full customer database	verifyly-rescreen-summary-2026-08-14.pdf	83-def4b6a529...	maria.reyes@acme.example	Acme Affiliates Ltd: Access the consolidated list or an equivalent commercial list, with fuzzy matching; disclose and freeze on a match
2026-09-15	UK, EU, UN	Full customer database	verifyly-rescreen-summary-2026-09-15.pdf	12-a09344f406...	maria.reyes@acme.example	Acme Affiliates Ltd: Access the consolidated list or an equivalent commercial list, with fuzzy matching; disclose and freeze on a match

11. Sanctions list changes in the period

List changes the operator recorded as published inside the period, and whether someone confirmed screening covered each one. An unconfirmed change is a GAP.

PUBLISHED	LIST	WHAT CHANGED	COVERAGE CONFIRMED
2026-07-22	UK	UK consolidated list updated: new designations added	maria.reyes@acme.example, 2026-07-23
2026-08-28	EU	EU consolidated list amended: existing entries updated	owen.clarke@acme.example, 2026-08-31
2026-09-26	UN	UN Security Council list: designations added	GAP

12. Licences

Licences recorded in the workspace as they stand at generation. A recorded expiry that has passed by the end of the period is a GAP.

LICENCE	NUMBER	STATUS (AS RECORDED)	EXPIRY
GOSS - affiliate marketing (Acme Affiliates Ltd)	GOSS-T-0231	Transitional Licence (Schedule 8)	2027-03-31
B2B - game content supply (Acme Studios Ltd)	B2B-T-0412	Transitional Licence (Schedule 8)	2027-03-31

13. Board minutes in the period

Board meetings dated inside the period. A meeting with no minutes file attached is a GAP.

MEETING DATE	LOCATION	HELD IN GIBRALTAR	MINUTES FILE
2026-04-28	Europort, Gibraltar	Yes	Attached
2026-07-21	Europort, Gibraltar	Yes	Attached