

Code of Conduct for Anjouan Internet Gaming Operators

Issued by ANJ Management Ltd. (Anjouan Gaming)

Introduction

This Code of Conduct sets out the ethical standards, operational requirements, and professional obligations applicable to all Internet Gaming Operators licensed by **ANJ Management Ltd, operating as Anjouan Gaming**, acting as the competent licensing and supervisory authority on behalf of the Autonomous Island of Anjouan.

Compliance with this Code is **mandatory** for all licensees and forms an integral part of the conditions of licensure. Failure to comply may result in regulatory enforcement action, including suspension or revocation of the gaming license.

This Code is intended to promote integrity, fairness, player protection, and regulatory accountability while safeguarding the international reputation of Anjouan as a responsible gaming jurisdiction.

Core Principles

All licensed operators must conduct their activities in accordance with the following principles:

- **Integrity** – Operate honestly, transparently, and ethically at all times
 - **Fairness** – Ensure all gaming activities are conducted fairly and without manipulation
 - **Player Protection** – Safeguard players, including vulnerable persons
 - **Compliance** – Adhere to all applicable laws, regulations, license conditions, and directives
 - **Responsibility** – Promote responsible gaming and minimize gambling-related harm
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1. Legal and Regulatory Compliance

1.1 Adherence to Laws and Standards

Operators must comply with:

- All applicable laws and regulations governing Internet gaming in Anjouan
- International standards relating to Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF)
- Applicable data protection and privacy regulations

1.2 Licensing Scope and Conditions

Operators must:

- Operate strictly within the scope of their Anjouan-issued gaming license
- Offer gaming services only through **authorized brands, domains, and URLs** approved under their license
- Notify Anjouan Gaming of any material changes to ownership, control, business structure, or operations within **7 calendar days**

Unauthorized use of the license, regulatory references, or site seal constitutes a serious breach.

1.3 Cooperation with the Regulator

Operators must cooperate fully with:

- Audits, inspections, and investigations
 - Requests for information
 - Compliance reviews and enforcement actions
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2. Player Protection

2.1 Responsible Gaming

Operators must implement effective responsible gaming measures, including:

- Self-exclusion mechanisms
- Deposit, loss, and time limits
- Reality checks and player awareness tools

2.2 Prohibition of Underage Gaming

Operators must implement robust age-verification procedures to ensure no person under **18 years of age** is permitted to participate in gaming activities.

2.3 Transparency and Fair Treatment

Operators must:

- Clearly disclose terms and conditions, game rules, odds, and payout structures
 - Ensure all promotions and bonuses are transparent and not misleading
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2.4 Player Complaints and Dispute Resolution

Operators must maintain clear, accessible, and effective procedures for handling player complaints and disputes.

a) **Acknowledgment of Complaints**

Operators must acknowledge receipt of a player complaint within **72 hours**.

b) **Internal Resolution Period**

Operators must make good-faith efforts to investigate and resolve all player complaints internally within **30 calendar days** from the date the complaint is received.

c) **Mandatory Escalation to Alternative Dispute Resolution (ADR)**

Where a complaint or dispute is **not resolved within the 30-calendar-day internal resolution period**, the player must be informed that **Alternative Dispute Resolution (ADR) is the next available escalation option**.

Operators are required to participate in ADR mechanisms designated or approved by **ANJ Management Ltd. / Anjouan Gaming**. Participation is **mandatory, binding, and conducted in good faith**.

d) **ADR Costs**

All costs associated with ADR proceedings, including administrative and adjudication fees, shall be **borne entirely by the operator**. Under no circumstances may ADR-related costs be charged to the player.

e) **Cooperation and Compliance**

Operators must cooperate fully with ADR proceedings and comply with determinations, recommendations, or resolutions issued through ADR or by Anjouan Gaming.

f) **Regulatory Oversight**

Failure to engage in ADR, failure to bear ADR costs, or failure to comply with outcomes constitutes a **material breach of licensing conditions**.

3. Game Integrity and Fairness

3.1 Game Certification

All games must be tested and certified by an independent testing laboratory approved by Anjouan Gaming.

3.2 Random Number Generators (RNGs)

RNGs must meet recognized industry standards to ensure fairness and randomness.

3.3 Fraud Prevention

Operators must implement systems to detect and prevent fraud, collusion, and manipulation.

4. Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF)

Operators must:

- Conduct AML/CTF risk assessments
 - Implement robust KYC and KYB procedures
 - Monitor transactions for suspicious activity
 - Submit Suspicious Activity Reports (SARs) as required
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5. Advertising and Marketing Standards

5.1 Truthful Advertising

Marketing materials must be accurate and not misleading.

5.2 Responsible Messaging

Advertising must:

- Include responsible gaming messages
- Avoid targeting minors or vulnerable individuals

5.3 Promotions

All promotional terms must be clearly disclosed. Promotions must not exert undue pressure to gamble.

6. Data Protection and Cybersecurity

6.1 Data Privacy

Player data must be collected and processed lawfully, securely, and with informed consent.

6.2 Cybersecurity

Operators must employ appropriate technical and organizational measures to protect systems and data. Cybersecurity incidents must be reported to Anjouan Gaming within **24 hours**.

7. Corporate Governance and Ethics

Operators must ensure:

- Directors and key personnel act with integrity
 - Staff receive training on compliance, AML/CTF, and responsible gaming
 - Conflicts of interest are avoided and managed appropriately
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8. Financial Integrity

8.1 Player Funds

Operators must:

- Maintain player funds in segregated accounts
- Process withdrawals promptly and without unjustified delay

8.2 Financial Reporting

Operators must submit annual financial reports demonstrating financial soundness.

9. Enforcement and Penalties

9.1 Compliance Monitoring

Anjouan Gaming may conduct regular or ad hoc audits and reviews.

9.2 Sanctions

Breaches of this Code may result in:

- Fines or financial penalties
- Suspension or revocation of the gaming license
- Public disclosure of violations

Serious breaches, including non-payment of player funds, failure to cooperate with ADR, or operation of unauthorized websites, may result in **immediate suspension pending investigation**.

10. Continuous Improvement

Operators are encouraged to adopt emerging technologies, including blockchain and AI, to enhance transparency, security, and player protection, subject to regulatory approval.

Acknowledgment

All licensed operators must formally acknowledge and agree to comply with this Code of Conduct as a condition of licensure. Any breach may result in enforcement action by **ANJ Management Ltd.** / Anjouan Gaming.