

# Anti-Money Laundering (AML) & Counter-Terrorist Financing (CTF) Code of Conduct

## For Anjouan Internet Gaming Operators

Issued by ANJ Management Ltd. (Anjouan Gaming)

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### 1. Introduction

This Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Code of Conduct (the “Code”) establishes the mandatory standards, controls, and obligations applicable to all Internet Gaming Operators licensed by **Anjouan Licensing Services Inc., operating as Anjouan Gaming**, the competent licensing and supervisory authority acting on behalf of the Autonomous Island of Anjouan.

Compliance with this Code is **mandatory** and forms an integral part of each operator’s licensing conditions. Failure to comply may result in regulatory enforcement action, including financial penalties, suspension, or revocation of the gaming license.

This Code is aligned with international best practices, including the **Financial Action Task Force (FATF) Recommendations**.

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### 2. Scope of Application

This Code applies to:

- All licensed Internet Gaming Operators
- Ultimate Beneficial Owners (UBOs), shareholders, directors, officers, and key personnel
- Employees, contractors, and agents
- Third-party service providers involved in gaming, payments, or player onboarding

Operators remain fully responsible for AML/CTF compliance, including where functions are outsourced.

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### 3. Legal and Regulatory Framework

Operators must comply with:

- AML/CFT laws and regulations applicable in Anjouan
  - Directives, guidance, and notices issued by Anjouan Gaming
  - International AML/CTF standards, including FATF Recommendations
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## 4. Core AML / CTF Principles

Operators must adhere to the following principles:

- **Risk-Based Approach** – Controls must be proportionate to identified ML/FT risks
  - **Transparency** – Funds and player activity must be traceable
  - **Accountability** – Clear responsibility for AML compliance must be established
  - **Cooperation** – Full cooperation with Anjouan Gaming, AOFA, and relevant authorities
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## 5. Risk Assessment

### 5.1 Risk Identification

Operators must conduct a documented AML/CTF risk assessment considering:

- Player risk profiles (geography, behaviour, funding sources)
- Products and services offered
- Payment methods and delivery channels
- Jurisdictions involved, including FATF-identified high-risk countries

### 5.2 Risk Mitigation

Based on identified risks, operators must:

- Implement proportionate controls
  - Apply Enhanced Due Diligence (EDD) where required
  - Review and update the risk assessment at least annually, or upon material change
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## 6. Player Due Diligence Standards

### 6.1 Customer Due Diligence (CDD) – At Registration

Operators must conduct **Customer Due Diligence (CDD)** at the point of player registration.

At a minimum, operators must collect and record the following information at signup:

- Full legal name
- Valid email address
- Date of birth
- Residential address

No account may be activated unless the above information has been provided.

## 6.2 Enhanced Due Diligence (EDD) – Mandatory Triggers

Operators must conduct **Enhanced Due Diligence (EDD)** where **any** of the following occurs:

- Upon the player's **first withdrawal request**, regardless of amount;
- When **aggregate lifetime deposits reach USD 10,000 (or equivalent)**;
- Where elevated risk indicators or suspicious activity are identified.

## 6.3 Enhanced Due Diligence (EDD) – Documentation

EDD must include, at a minimum:

- Government-issued photo identification
- Utility bill or equivalent document confirming residential address
- Proof of source of funds **where required based on risk assessment**

## 6.4 Restrictions Pending Completion of EDD

Where EDD has been triggered but not completed:

- Withdrawals must not be processed
- Financial activity must be restricted where necessary to mitigate risk

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## 7. Player Complaints and Dispute Resolution

- Complaints must be acknowledged within **72 hours**
- Internal resolution must be attempted within **30 calendar days**
- Unresolved complaints must be escalated to **mandatory ADR**
- ADR participation is mandatory and **at the expense of the operator**

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## 8. Record Keeping

### 8.1 Retention Period

Operators must retain AML-related records for a **minimum of five (5) years**, including:

- CDD and EDD documentation
- Transaction records (deposits, wagers, withdrawals)
- SARs and internal reports
- Audit and compliance records

### 8.2 Accessibility

Records must be stored securely and be readily available to Anjouan Gaming upon request.

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## 9. Ongoing Monitoring and Reporting

### 9.1 Transaction Monitoring

Operators must implement systems to detect:

- Structuring or threshold avoidance
- Rapid movement of funds
- Unusual betting patterns
- Activity involving high-risk jurisdictions

### 9.2 Suspicious Activity Reports (SARs)

Operators must report suspicious activity to **ANJ Management Ltd./ Anjouan Gaming** within **24 hours of detection**, including full supporting documentation.

### 9.3 Currency Transaction Reports (CTRs)

All transactions or linked transactions exceeding **USD 10,000 (or equivalent)** must be reported, whether suspicious or not.

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## 10. Internal Controls and Governance

### 10.1 AML Policies and Procedures

Operators must maintain written AML/CTF policies covering:

- Risk assessment
- CDD / EDD
- Monitoring and reporting
- Record keeping
- Staff training

### 10.2 Compliance Officer

Each operator must appoint a suitably qualified Compliance Officer responsible for:

- AML/CTF oversight
- Regulatory liaison
- Timely reporting and escalation

### 10.3 Training

All relevant staff must receive AML/CTF training:

- Upon onboarding
- Annually
- Following regulatory or policy changes

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## 11. Cybersecurity and Data Protection

Operators must:

- Protect the integrity and confidentiality of player data
- Implement appropriate technical and organizational safeguards
- Report cybersecurity incidents to Anjouan Gaming within **24 hours**

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## 12. Independent Audits

### 12.1 Annual AML Audit

Operators must undergo an **independent AML audit annually** assessing:

- Policy effectiveness
- Regulatory compliance
- Internal controls and training

## 12.2 Regulatory Inspections

Anjouan Gaming reserves the right to conduct inspections and audits at any time.

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## 13. Enforcement and Penalties

Non-compliance with this Code may result in:

- Financial penalties
  - Suspension or revocation of the gaming license
  - Public disclosure of violations
  - Referral to law-enforcement authorities in cases of serious or willful misconduct
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## 14. Continuous Improvement

Operators are encouraged to:

- Monitor regulatory developments
  - Adopt approved technological solutions (e.g., AI-based monitoring)
  - Participate in industry compliance initiatives
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## Acknowledgment

All licensed operators must formally acknowledge and agree to comply with this AML & CTF Code of Conduct as a condition of licensure.