

Application Process for an Anjouan Internet Gaming Licence

Issued by ANJ Management Ltd. (Anjouan Gaming) | Revised 13 October 2026

Purpose and administration

This overview describes the application and continuing-compliance process. Applications are administered through Anjouan Gaming by ANJ Management Ltd. under AOFA's designated arrangements. AOFA means the Anjouan Offshore Financial Authority. Approval remains subject to applicable law, suitability checks, technical assessment and licence conditions.

Use the current application forms, fee schedule and instructions. This overview does not guarantee approval, processing time, access to a particular market or permission to operate before authorisation. The revised KYC and AML Code of Conduct dated 13 October 2026 applies from the implementation date specified by AOFA; existing duties continue until replacement takes effect.

1. Define the applicant and proposed licence scope

Establish a legal entity in Anjouan or another jurisdiction accepted for the proposed application. Eligibility of a foreign entity must be confirmed under current programme policy; incorporation elsewhere does not guarantee acceptance. Provide the legal name, registration details, registered address and proposed ownership and management structure.

Identify whether the application is B2C, B2B or both. Describe the products, platforms, game or content suppliers, brands, domains, target markets, payment channels and any virtual-asset use. A B2C licence does not automatically authorise supplying platforms or content to unrelated operators.

Where a third-party platform will be used initially and a group platform later, describe both phases and their suppliers and approvals. Related applications may be assessed concurrently where accepted, but each applicant must independently demonstrate readiness and suitability. A platform still under development is not authorised merely because an application has been filed.

The excluded-territories list is non-exhaustive. Each operator is responsible for identifying and complying with applicable local laws in every jurisdiction in which it offers, markets or provides gaming services, including licensing, advertising and player-access restrictions. The absence of a jurisdiction from the excluded-territories list does not constitute permission to operate there. An Anjouan licence does not replace any local licence or authorisation required by law. Operators must assess their target markets, obtain qualified local legal advice where necessary and implement effective controls to prevent prohibited activity.

2. Prepare corporate, ownership and personal records

Provide the certificate of incorporation, constitutional documents, current shareholder and director registers, registered-office evidence and a complete ownership/control chart tracing ultimate beneficial owners. Include relevant parent entities, nominee arrangements, trusts, foundations and persons exercising control.

Provide valid government-issued identification, recent address evidence, police clearance and a CV or professional history for relevant shareholders, ultimate beneficial owners, directors and key personnel, as required by the current checklist. Supply certified documents, translations and evidence of good standing where requested.

Disclose ownership arrangements below percentage thresholds where they obscure control, source of wealth where required, material adverse information and relevant regulatory or criminal history. Citizenship-by-investment status does not substitute for due diligence. Keep ownership information current throughout assessment and thereafter.

3. Prepare the operational and financial submission

Provide a detailed business plan or summary covering proposed services, target markets, launch phases, organisational responsibilities and three-year financial projections. Explain funding, reserves, liquidity and player-funds protection; provide source-of-funds evidence and bank references or other financial evidence required by the current checklist.

Provide platform architecture, hosting arrangements, game/software details, relevant independent testing evidence and supplier contracts. Demonstrate required Anjouan B2B licensing or recognition for platform and content suppliers. Address applicable technical requirements, including GLI-19 or GLI-33 where required for the product.

Include AML/CFT and proliferation-financing policies, business risk assessment, sanctions and PEP procedures, monitoring, payment controls, virtual-asset controls if relevant, reporting arrangements, record keeping and staff training. Identify the Key Person, Compliance Officer and MLRO with responsibilities and reporting lines.

Include terms and conditions, privacy and security policies, responsible gaming and self-exclusion procedures, complaints and approved ADR arrangements, incident response, marketing/affiliate controls and prohibited-market procedures.

4. Submit the application and payment

Complete the current official application form supplied by Anjouan Gaming or the authorised application channel. Submit a consistent, complete set of corporate, personal, technical, operational and financial records. Disclose omissions and explain how they will be resolved; do not submit misleading information.

Pay the applicable non-refundable application and licensing fees in accordance with the current fee schedule and payment instructions. ANJ Management Ltd. invoices and collects programme payments under its designated arrangements. Obtain payment instructions through the authorised channel and retain proof of payment.

Where incorporation services are requested, complete the required corporate KYC and payment before incorporation proceeds. Corporate applicant due diligence is separate from the player-verification thresholds applicable to licensed B2C operations.

5. Completeness checks, investigation and assessment

The application is screened for completeness before substantive review. Additional documents, explanations, references or updated evidence may be required. Background and suitability checks address shareholders, beneficial owners, directors, key personnel, related entities and relevant history.

Technical assessment examines platforms, games, security, supplier status and operational readiness. Financial assessment examines funding provenance, solvency, liquidity and business viability. Compliance assessment examines governance, player protection, AML controls, target markets and reporting capability.

Allow approximately six weeks on average for due diligence, background investigation and assessment once a complete application and required payment are received. Complex structures, missing documents or adverse findings may extend this period. This is an estimate, not a service guarantee. No fast-track approval is implied.

Applications and queries are handled through designated remote channels. Administrative offices are not public visitor facilities and routine in-person application meetings are not offered. Attempts to circumvent due diligence or pressure staff may adversely affect the suitability assessment and may result in rejection.

6. Decision, licence issue and readiness to operate

The competent decision-maker may approve, impose conditions, request further information or refuse an application under the applicable framework. Any decision communication will set out applicable conditions and next steps to the extent lawfully disclosable. Reapplication is subject to current requirements and is not guaranteed.

An approval in principle or application submission does not itself permit gaming. Before launch, ensure the licence is valid, the proposed activities and domains are authorised, suppliers and technical systems meet applicable approvals and the website implements the required controls and official interactive validator.

Meet any launch deadline expressly specified in the issued licence or approval. This overview does not create a general six-month launch entitlement. Obtain required approval for platform migration, material changes, new products or domains before implementation.

7. Player verification and AML readiness

Under the revised KYC/AML Code, obtain prescribed registration information before activating a player account and apply proportionate age, sanctions and fraud checks. Routine documentary identity verification before the first deposit or play is not required absent a trigger, unless applicable law or a binding licence condition requires it earlier.

Complete identity, age and residence verification at the earliest of EUR 3,000 or equivalent in aggregate lifetime deposits; the first withdrawal request, regardless of amount; suspicious activity; a single qualifying financial transaction or identifiable linked series reaching EUR 3,000 or equivalent; or doubt about supplied identity information.

Verify before accepting the threshold-crossing deposit or executing another qualifying threshold-crossing transaction. Aggregate gross deposits across the same licensee's accounts and brands without offsetting withdrawals or losses. Restrict funds received before required verification and block further deposits, real-money wagers and payouts pending completed checks or lawful resolution.

The separate US\$10,000-equivalent CTR threshold is not a KYC threshold. Implement the detailed Article 9.3 calculation and Annex A reporting specification, including separate gross incoming/outgoing amounts, rolling 24-hour aggregation and longer demonstrably linked series. The weekly reporting cycle and Tuesday 17:00 UTC deadline, including nil returns, commence as specified by AOFA's adoption notice.

Submit SARs independently, promptly and no later than 24 hours after suspicion or reasonable grounds arise under the revised Code, including attempted activity and irrespective of amount. Meet statutory filing

duties separately. Ensure secure channels, confidentiality and documented reporting responsibility are operational.

8. Continuing compliance and renewal

Maintain authorised websites, accurate licensing disclosures and the unmodified interactive validator. Maintain player-funds segregation, prompt lawful payouts, current financial records, supplier oversight, training, incident response, monitoring and independent compliance review.

Acknowledge complaints within 72 hours and attempt internal resolution within 30 calendar days. Provide access to the designated AOFA-approved ADR provider, participate in good faith and bear applicable ADR costs. Anjouan Gaming supervises compliance and does not adjudicate individual player disputes.

Submit regulatory reports at prescribed intervals and cooperate with lawful inspections and information requests. Notify ownership changes, material application changes and relevant overseas licence suspensions or terminations in accordance with applicable conditions. Keep beneficial ownership and corporate due-diligence information current.

Renewal is not automatic. Submit the annual renewal application, required updated documents and fees in sufficient time before expiry under the current renewal instructions. Refresh corporate applicant KYC at least annually and when circumstances change; player reviews follow the separate risk-based KYC/AML Code. Do not assume continued authority after expiry without express lawful approval.

9. Regulatory action and contact

Non-compliance or misleading submissions may lead to refusal, remediation requirements, suspension, revocation or other legally authorised measures under the relevant framework.

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