

Code of Conduct for Anjouan Internet Gaming Operators

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

Purpose, authority and interpretation

This Code sets ethical, operational and professional standards for Anjouan Internet Gaming licensees. AOFA means the Anjouan Offshore Financial Authority. Anjouan Gaming means the administrative service designated by AOFA; this designation does not itself make it a financial intelligence unit or law-enforcement body.

Operators must comply with applicable law, binding AOFA directions and licence conditions. This Code supplements those obligations and applies as a licensing requirement to the extent adopted or incorporated by AOFA. New provisions apply prospectively from the implementation date specified by AOFA; existing obligations continue until replaced. Escalate conflicts promptly without breaching applicable law.

The separate KYC and AML Code of Conduct, final edition dated 13 October 2026, governs detailed AML/CFT and proliferation-financing controls, verification, monitoring, reporting and record keeping. Its effective date, channels and transition are determined by the AOFA adoption notice. This general Code does not amend its reporting procedures.

Core principles

Integrity: act honestly, transparently and ethically. Fairness: provide fair games and fair treatment. Player protection: safeguard players and vulnerable people. Compliance: meet applicable obligations and cooperate with supervision. Responsibility: prevent gambling harm and misuse of gaming services.

1. Legal compliance, scope and regulatory cooperation

Operate only within the licence's scope and through authorised brands, domains and URLs. Do not sublicense, misrepresent regulatory status or use unauthorised seals. Display accurate operator and licensing details and the official unmodified interactive validator.

Understand the laws of the markets served and apply current prohibited-territory and sanctions controls. An Anjouan licence does not replace any local authorisation that may be required.

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.

Cooperate with lawful inspections, investigations, audits and information requests. Provide complete, accurate and timely information through designated channels. Attend reasonably notified regulatory meetings; routine application administration is conducted remotely.

Maintain current beneficial ownership and control records, including nominees, trusts, foundations and other arrangements. Notify a beneficial ownership change of 10% or more within 10 business days under the applicable licence conditions; meet any shorter applicable direction. Notify other material changes promptly and obtain prior approval where required. Disclose relevant licence suspensions or terminations in other jurisdictions. A percentage threshold does not excuse concealing ultimate ownership or control.

2. Player protection and fair treatment

Implement effective self-exclusion, deposit, loss and time limits, reality checks and player-support measures. Block self-excluded players within one working day, with immediate restriction where practicable; prevent targeted promotions to excluded players. Identify signs of harm and document proportionate interventions.

No person below 18, or a higher applicable minimum age, may gamble. Obtain registration information and apply proportionate age, sanctions and fraud controls before activation. Routine documentary identity verification before the first deposit or play is not required under the revised KYC/AML Code absent a trigger. Verify earlier where applicable law, licence conditions, age concerns, identity doubts or suspicion require it.

Disclose clear game rules, applicable odds or RTP, payout structures, fees and account terms. Bonuses and promotions must be transparent, accurate and free from undue pressure. Do not introduce unjustified withdrawal barriers or apply misleading retrospective terms.

3. Complaints and alternative dispute resolution

Maintain accessible complaints procedures, acknowledge complaints within 72 hours and make good-faith efforts to investigate and resolve them within 30 calendar days from receipt.

For unresolved disputes, tell the player how to access the designated AOFA-approved ADR provider. State the provider's name and contact details in player-facing terms. Participation is mandatory where required under the licence and applicable ADR rules; engage in good faith and comply with binding outcomes.

The operator bears all applicable ADR administrative and adjudication fees. No ADR-related cost may be charged to the player. Preserve complaint records and cooperate fully with proceedings. Anjouan Gaming supervises compliance and does not adjudicate individual player disputes. Respect legal confidentiality and lawful AML restrictions without using them to evade ADR.

4. Game integrity, technical standards and supplier oversight

Use games and RNG systems tested by an independent laboratory approved by Anjouan Gaming, with certification appropriate to the product. Maintain accurate certification evidence, fair payout configurations and controls against fraud, collusion, bots and manipulation.

Assess platform and content suppliers for fitness, properness and the required Anjouan B2B licence or recognition. Maintain enforceable contracts, access to compliance data and an identifiable commercial rationale. Disclose significant cross-border B2B flows unrelated to regulated gambling and B2B virtual-asset settlements as required by applicable conditions.

5. AML/CFT and proliferation-financing controls

Maintain a board-approved, risk-based programme, business and player risk assessments, a qualified independent MLRO and deputy, sanctions and PEP controls, ongoing monitoring, training and independent review. Outsourcing does not transfer the operator's accountability.

Under the revised KYC/AML Code, complete identity, age and residence verification at the earliest of: aggregate lifetime deposits reaching EUR 3,000 or equivalent; the first withdrawal request regardless of value; suspicious activity regardless of value; a single qualifying financial transaction or identifiable linked series reaching EUR 3,000 or equivalent; or doubt about supplied identity information.

Verify before accepting a threshold-crossing deposit or executing another threshold-crossing qualifying transaction. Aggregate gross lifetime deposits across accounts and brands under the same licensee without offsetting withdrawals, losses or refunds. Use historical EUR valuations under the detailed Code. A cancelled withdrawal request does not cancel verification.

Restrict received funds pending required verification; permit no further deposits, real-money wagers or payouts until required checks are completed or a lawful resolution is approved. Apply enhanced due diligence proportionately to risk rather than automatically to every threshold or low-risk first withdrawal. Do not confiscate funds solely because checks are incomplete or a report has been filed.

The separate CTR threshold is US\$10,000 or equivalent for completed reportable funds movements, including virtual assets. Calculate gross incoming and outgoing movements separately; apply rolling 24-hour aggregation and demonstrably linked longer series under Article 9.3. Do not count ordinary internal wagers as fresh reportable movements.

Once commenced, weekly CTRs cover Monday 00:00 UTC to the following Monday 00:00 UTC and are due by 17:00 UTC the following Tuesday, including nil returns. Use the dedicated Annex A structure and specified secure channel. SARs are separate and required promptly, no later than 24 hours after suspicion or reasonable grounds arise, regardless of amount and including attempted activity. Meet statutory reporting obligations separately. Preserve confidentiality and prevent tipping off.

These are programme requirements informed by FATF Standards; they do not imply FATF endorsement. The US\$10,000 CTR threshold and weekly filing procedure are programme rules, not a universal FATF-prescribed reporting threshold or deadline.

6. Advertising and marketing

Marketing must be truthful, accurate and responsible. Avoid targeting minors or vulnerable people, guaranteed-return claims and suggestions that gambling resolves financial problems. Include responsible gaming messages and clearly disclose material promotion conditions. Monitor affiliates and contractors; commercial or VIP priorities must not override compliance decisions.

7. Data protection, security and incidents

Process personal data for lawful, transparent purposes with appropriate safeguards, minimisation and retention. Consent is not the sole possible legal basis. Comply with applicable privacy law and cross-border transfer requirements.

Maintain current encryption, access controls, privileged-user multifactor authentication, logging, vulnerability management, tested backups and incident response. Protect identity records, reports and

player funds, including when using vendors.

Notify the designated regulatory channel within 24 hours after discovery of a material cybersecurity incident affecting player data, funds, AML controls or reporting under the revised Code. Provide available facts and updates. Meet shorter legal deadlines and other licence-condition notifications, including the applicable three-working-day requirement for serious operational or reputational incidents.

8. Governance, financial integrity and records

Directors and key personnel must act with integrity, manage conflicts of interest and resource compliance adequately. Train relevant staff before independent duties, at least annually and after material changes. Maintain accountable decisions and protect good-faith reporting.

Maintain segregated player funds, adequate liquidity, reconciliations and prompt lawful withdrawals. Publish accurate information about funds protection; segregation alone must not be represented as a guarantee of insolvency protection. Submit annual financial reports and other returns as required.

Keep identity, due-diligence and relationship records for at least five years after closure; transaction records for at least five years after the transaction; and reports, analysis and filing receipts as required by the KYC/AML Code. Apply longer lawful preservation requirements and provide secure access on lawful request.

9. Monitoring, enforcement and remediation

AOFA may require compliance reviews, inspections, information and remediation under the applicable legal and licensing framework. Breaches may result in measures including suspension or revocation, financial penalties where legally authorised and public disclosure where lawful.

Serious suspected breaches, including non-payment of player funds, unauthorised websites or refusal to cooperate with approved ADR, may justify urgent protective action under the applicable powers and procedure. This Code does not itself create a criminal offence or an unlimited penalty power. Suspected offences may be referred to competent authorities.

10. Review and implementation

Review controls at least annually and after significant incidents, audit findings or material legal, regulatory or operational changes. Automated and AI tools require validation and accountable human oversight.

Implement the approved edition according to AOFA's notice and transitional milestones. Maintain current policies and an implementation owner.

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