

Responsible Gaming Guidelines for Anjouan Gaming Licensees

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

Purpose and application

These guidelines set out measures to prevent gambling-related harm, protect minors and vulnerable players, and support informed participation. Gambling must be presented as entertainment, not a source of income or a solution to financial problems. No operator can guarantee that gambling is free from harm.

Read these guidelines with applicable law, binding AOFA directions, licence conditions, the October 2026 general Code of Conduct, Website Compliance guidance and the separate KYC and AML Code of Conduct dated 13 October 2026. AOFA means the Anjouan Offshore Financial Authority; Anjouan Gaming provides administrative services designated by AOFA.

“Must” identifies requirements under applicable licence conditions or adopted Codes. “Should” identifies recommended implementation practice. Additional requirements introduced through an adopted Code apply from the date and under the transitional arrangements specified by AOFA. Existing obligations, including self-exclusion and approved ADR, continue independently of the new KYC/AML implementation notice. These guidelines do not themselves waive or amend a binding condition.

1. Core principles and operator accountability

Protect players from financial and other gambling-related harm. Provide clear information, effective controls and timely intervention. Prevent underage participation and avoid misleading or exploitative practices.

The operator remains responsible for its platforms, brands, staff, affiliates and outsourced functions. Senior management should assign an accountable responsible gaming lead, provide adequate resources and review outcomes regularly. Commercial targets, bonuses and VIP status must not override player-protection decisions.

2. Age, eligibility and registration controls

No person below 18, or the higher applicable minimum age, may gamble. Obtain prescribed registration information, including full legal name, date of birth and residential details, before activating an account. Apply proportionate age, geography, sanctions and fraud controls. Do not rely on a tick-box age declaration as the sole safeguard where other information indicates underage risk.

Under the revised KYC/AML Code, documentary identity verification is not routinely required before the first deposit or real-money play absent a trigger. Earlier checks remain mandatory where required by applicable law, binding licence conditions, age concerns, identity doubts or suspicious activity. The threshold approach does not permit underage gambling.

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 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 qualifying threshold-crossing transaction. Combine gross deposits across accounts and brands under the same licensee without offsetting withdrawals, wagers, losses or refunds. Restrict payments received before required verification and block further deposits, real-money wagers and payouts pending completed checks or lawful resolution. The detailed KYC/AML Code governs valuation, linkage and exceptions.

If underage participation is suspected, restrict gambling immediately and investigate promptly. Handle balances, refunds, records and notifications under applicable law and regulatory directions; do not automatically confiscate funds.

3. Accessible responsible gaming information

Maintain a prominent responsible gaming page linked site-wide and accessible from player accounts. Explain risks, signs of harm, available limits, breaks, self-exclusion, account closure and support services in clear language.

Provide accurate game rules, applicable odds or RTP and payout information. Explain that past results do not guarantee future outcomes and that losses should not be chased. Give players accessible transaction and gambling histories showing deposits, withdrawals, wagers and outcomes.

Information should be usable on mobile devices, accessible to players with disabilities and accurately translated for the markets served. Do not obscure controls behind promotional content or unnecessary steps.

4. Deposit, loss and time controls

Operators must provide effective deposit, loss and time limits and reality checks under the applicable Code. Players should be able to set limits easily, including daily, weekly or monthly deposit limits, and see the remaining allowance clearly.

Define how each limit is calculated, which brands or accounts it covers and the relevant period. Loss limits should use a clearly explained calculation and must not be labelled as deposit limits. Controls should prevent ordinary account switching from defeating their purpose.

Recommended practice is to apply reductions immediately and require a meaningful cooling-off period, ordinarily at least 24 hours, before an increase takes effect. Staff should not encourage increases or remove protections for commercial reasons. Any longer applicable legal or regulatory period takes precedence.

Reality checks should show elapsed session time and meaningful spending or outcome information, with a clear route to stop or log out. Record interruptions and system failures and remediate controls promptly.

5. Breaks, self-exclusion and account closure

Provide clear, easily accessible mechanisms for temporary breaks and self-exclusion for stated periods, with an indefinite option. Explain the scope, start time, duration and reinstatement process before confirmation. Requests must not require a player to justify harm or engage with retention staff.

Licensees must block players who request self-exclusion within one working day. Immediate automated restriction is recommended wherever practicable. Stop further gambling and deposits, suppress gambling promotions and prevent reopening during the exclusion. Do not use bonuses, VIP contact or incentives to reverse the request.

Recommended practice is to apply self-exclusion across brands and linked accounts operated by the same licensee, explain that scope to the player and use available identifiers to detect re-registration. Do not imply that exclusion automatically covers unrelated operators or a jurisdiction-wide register unless such coverage exists.

Self-exclusion must not obstruct access to legitimate balances or withdrawals. Resolve funds promptly, subject to identity verification and lawful restrictions. Explain permitted account access during exclusion and preserve necessary records.

Distinguish ordinary account closure from protective self-exclusion. A closure request that reveals gambling harm should be assessed for protective action. Reinstatement after a fixed exclusion should require a deliberate request and an appropriate risk review; it must not occur during the exclusion period.

6. Monitoring and proportionate intervention

Licensees must maintain procedures to identify players at risk of compulsive gambling and provide appropriate information, assistance and support. Use a combination of account activity, player communications, payment patterns and behavioural indicators; spending alone is not a complete assessment.

Indicators may include escalating deposits or losses, repeated failed payments, unusually long sessions, chasing losses, frequent requests to raise limits, distress, disclosed borrowing or financial difficulty, repeated closure/reopening requests and attempts to bypass protections. A single indicator is not a diagnosis; assess its context and urgency.

Recommended interventions range from personalised information and reminders to direct contact, protective limits, a break, suspension of gambling or exclusion where warranted. Record the concern, assessment, action and follow-up. Serious disclosures or clear immediate risk require prompt protective escalation rather than waiting for a scheduled review.

Do not require proof that a player can afford to lose money as a substitute for recognising behavioural harm. Source-of-funds evidence for AML purposes does not establish that gambling is safe or affordable.

Automated tools should support trained human decisions. Validate alerts for accuracy and effectiveness, protect privacy and avoid relying solely on opaque scores. Do not use harm indicators to intensify marketing.

7. Responsible advertising, promotions and VIP management

Advertising must be accurate and must not target minors or vulnerable people. Avoid guaranteed winnings, claims that gambling solves debt or financial hardship, and messaging that pressures players to chase losses or gamble beyond their means.

Include responsible gaming messaging and disclose material bonus terms prominently, including wagering requirements, restrictions and expiry dates. Do not make self-exclusion or access to protective tools conditional on fulfilling bonus requirements.

Suppress gambling marketing to self-excluded players and respect marketing preferences. Recommended practice is to suspend targeted promotions while a significant harm concern is being assessed. Oversee affiliate conduct and correct misleading or inappropriate campaigns promptly.

VIP and customer-service staff must follow player-protection controls. Do not reward staff for reversing self-exclusion, bypassing limits or retaining players identified as at risk.

8. Player support and staff training

Provide current links and contact details for reputable, accessible gambling-harm support and counselling services appropriate to the player's location and language. Verify availability and hours; do not describe a service as 24/7 unless it is. Independent help should be accessible without a deposit or an active gaming account.

Staff should listen respectfully, avoid blame or diagnosis, explain available protections and refer players to qualified support. If a player communicates immediate danger or self-harm, follow a documented urgent-response procedure and direct them to local emergency or crisis services. Operators do not replace clinical or emergency services.

Train relevant employees before independent duties, at least annually under the applicable Code and following material changes. Include recognition of harm, conversations with vulnerable players, self-exclusion, limits, marketing suppression, privacy, escalation and complaints. Record training and assess understanding.

9. Complaints and mandatory approved ADR

Maintain clear, accessible complaints procedures. Acknowledge complaints within 72 hours and make good-faith efforts to investigate and resolve them within 30 calendar days from receipt. Keep records and explain decisions clearly.

All operators must clearly identify their designated AOFA-approved ADR provider in their player-facing Terms and Conditions, including the provider's name and contact information, so players can access ADR directly. Keep those details current and explain how to submit a dispute.

Where a dispute remains unresolved after the internal resolution period, inform the player of the approved ADR route. Operators must participate in good faith, bear all applicable ADR administrative and adjudication costs and comply with binding outcomes under applicable rules. ADR-related costs must not be charged to the player.

Anjouan Gaming oversees regulatory compliance and does not adjudicate individual player disputes. AML reviews do not remove ADR duties, although lawful restrictions and reporting confidentiality must be respected.

10. Privacy, records and reporting

Process responsible gaming information lawfully and securely, with access limited to appropriate personnel and purposes. Explain relevant monitoring in the privacy policy. Sensitive disclosures must not be repurposed for player acquisition or promotional targeting.

Keep auditable records of exclusion requests and activation, limits and changes, alerts, interventions, contacts, complaints, marketing suppression and reinstatement decisions. Set lawful retention periods and preserve records required by the licence, Code or regulatory request. KYC/AML records remain subject to the separate Code's retention requirements.

Provide responsible gaming returns and information in the intervals and formats directed by AOFA. Report material incidents under applicable conditions. The separate KYC/AML Code requires notification within 24

hours after discovery of material cybersecurity incidents affecting player data, funds, AML controls or reporting, once applicable; meet shorter legal deadlines and other required notifications.

The separate US\$10,000-equivalent CTR threshold concerns reportable financial movements, not harm detection or the timing of player verification. Suspicious activity reporting operates independently of responsible gaming interventions and transaction thresholds.

11. Assurance and continuous improvement

Review responsible gaming policies and their effectiveness at least annually under the applicable Code and after significant incidents, product changes, regulatory developments or audit findings. Include documented internal review and proportionate independent assurance.

Management should monitor the speed and effectiveness of exclusions, breaches of controls, interventions, marketing suppression, staff training and complaint outcomes. Investigate failures, assign remediation owners and verify that corrective measures work. Revenue or player retention must not be treated as proof of player-protection effectiveness.

Maintain consistency between published policies and actual system behaviour. Operators must not advertise protections that are unavailable, unreliable or materially narrower than described.

Contact

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