

# Code of Conduct for Anjouan Internet Gaming Operators Issued by Anjouan Licensing Services Inc.

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## Introduction

This **Code of Conduct** outlines the ethical standards, operational requirements, and professional obligations for all Internet Gaming Operators licensed by **Anjouan Licensing Services Inc.** It aims to promote integrity, fairness, and accountability within the gaming industry while safeguarding the interests of players and maintaining the global reputation of the jurisdiction of Anjouan.

Compliance with this Code is mandatory for all licensees and forms part of their licensing conditions.

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## Core Principles

1. **Integrity:** Operate with honesty and transparency to foster trust among players and stakeholders.
  2. **Fairness:** Ensure all gaming activities are conducted fairly and without manipulation.
  3. **Player Protection:** Prioritize the safety and well-being of players, especially vulnerable groups.
  4. **Compliance:** Adhere to all applicable laws, regulations, and directives issued by Anjouan Gaming.
  5. **Responsibility:** Promote responsible gaming practices to minimize harm to players and communities.
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## 1. Legal and Regulatory Compliance

### 1.1. Adherence to Laws

Operators must comply with:

- The laws and regulations of Anjouan governing internet gaming.
- International standards on Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT).
- Data protection regulations applicable to player information.

### 1.2. Licensing Requirements

- Operate only within the scope of their Anjouan-issued gaming license.
- Notify Anjouan Gaming of any material changes in business structure, ownership, or operations within 30 days.

### 1.3. Cooperation with Regulators

Operators must:

- Cooperate fully with audits, investigations, and inspections conducted by Anjouan Gaming.
  - Respond promptly to inquiries and requests for information.
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## 2. Player Protection

### 2.1. Responsible Gaming

- Provide tools for players to manage their gaming activities, including:

- Self-exclusion options.
- Deposit, loss, and time limits.
- Reality checks to remind players of time spent gaming.

## **2.2. Prohibition on Underage Gaming**

- Implement robust age verification measures to ensure that no individual under the legal age (18 years or older) participates in gaming activities.

## **2.3. Transparency**

- Clearly communicate terms and conditions of play, including game rules, odds, and payout structures.
- Ensure that promotional offers are not misleading and include all applicable terms.

## **2.4. Fair Complaint Handling**

- Establish accessible and transparent procedures for resolving player disputes.
- Players must be informed of their right to escalate unresolved disputes to Anjouan Licensing Services Inc..
- Mandatory participation in ADR

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## **3. Game Integrity and Fairness**

### **3.1. Game Certification**

- All games must be tested and certified by an independent third-party testing agency approved by Anjouan Licensing Services Inc..

### **3.2. Random Number Generators (RNGs)**

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

### **3.3. Fraud Prevention**

- Implement systems to detect and prevent fraudulent activities, such as collusion and game manipulation.

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

### **4.1. AML/CTF Compliance Program**

Operators must:

- Conduct risk assessments to identify and mitigate AML/CTF risks.
- Implement Know Your Customer (KYC) procedures to verify the identity of all players.

### **4.2. Transaction Monitoring**

- Monitor player transactions to detect unusual patterns or behaviors indicative of money laundering or terrorist financing.

### **4.3. Reporting Suspicious Activity**

- Report Suspicious Activity Reports (SARs) to Anjouan Gaming and any relevant financial intelligence units within the required timeframe.

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## **5. Advertising and Marketing Standards**

### **5.1. Truthful Advertising**

- Ensure all marketing materials are accurate and do not mislead players regarding the chances of winning or the risks involved.

## 5.2. Responsible Messaging

- Include responsible gaming messages and helpline information in all advertisements.
- Avoid marketing to vulnerable individuals, including minors or those with known gambling problems.

## 5.3. Use of Promotions

- Clearly state all terms and conditions of bonuses and promotions.
  - Avoid promotions that create undue pressure to gamble.
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## 6. Data Protection and Cybersecurity

### 6.1. Data Privacy

- Collect, store, and process player data in compliance with data protection laws.
- Obtain explicit player consent for data collection and processing activities.

### 6.2. Cybersecurity Measures

- Employ advanced security protocols to protect player data and systems from breaches or unauthorized access.
  - Report any cybersecurity incidents to Anjouan Gaming within 24 hours.
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## 7. Corporate Governance and Ethics

### 7.1. Leadership Accountability

- Directors and key personnel must act with integrity and ensure the operator's compliance with this Code.

### 7.2. Training and Awareness

- Train staff on responsible gaming, AML/CTF compliance, and data protection requirements.

### 7.3. Conflict of Interest

- Avoid conflicts of interest that may compromise the fairness or integrity of gaming operations.
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## 8. Financial Integrity

### 8.1. Player Funds

- Maintain player funds in segregated accounts to ensure their availability for withdrawal.
- Provide clear and timely payouts to players in accordance with stated policies.

### 8.2. Reporting Requirements

- Submit annual financial reports clearly demonstrating the licensee's financial position.
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## 9. Enforcement and Penalties

### 9.1. Compliance Monitoring

- Anjouan Licensing Services Inc. will conduct regular and ad hoc audits of licensees to ensure compliance with this Code.

### 9.2. Penalties for Non-Compliance

Violations of this Code may result in:

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

### **9.3. Right to Appeal**

Operators have the right to appeal enforcement actions through the established procedures of Anjouan Licensing Services Inc.

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## **10. Continuous Improvement**

### **10.1. Innovation and Adaptation**

Adopt emerging technologies, such as blockchain and AI, to enhance transparency, security, and player experiences.

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### **Acknowledgment**

All licensed operators must acknowledge and agree to adhere to this Code of Conduct as a condition of their licensure. Any breach of this Code may result in enforcement actions as deemed necessary by Anjouan Licensing Services Inc.