CLIENT ACCEPTANCE POLICY

Company	GoldTakas FZCO
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This Policy shall be read in conjunction with GoldTakas FZCO's AML/CFT Policy, Risk Assessment and Scoring Policy, Anti-Bribery and Anti-Corruption Policy, Third-Party and Supply Chain Due Diligence procedures, and other applicable compliance policies and procedures.

Rather than duplicating the detailed risk scoring methodology set out in the Risk Assessment and Scoring Policy, this Policy establishes the principles, responsibilities and decision-making framework governing Client onboarding, Client acceptance, continuation, rejection and termination decisions.

1. PURPOSE

The purpose of this Policy is to define the Client acceptance framework applied by GoldTakas FZCO to ensure that business relationships are established and maintained only with Clients whose identity, ownership structure, business purpose, source of funds and risk profile can be adequately understood, verified and managed.

This Policy supports GoldTakas FZCO's commitment to preventing money laundering, terrorist financing, proliferation financing, sanctions breaches, bribery, corruption, fraud and other financial crime risks arising from its precious metals trading activities.

This Policy further aims to:

- Establish clear principles for Client onboarding, acceptance, continuation and rejection
- Ensure that Client acceptance decisions are based on a Risk-Based Approach
- Define minimum requirements for Client Due Diligence and Enhanced Due Diligence
- Ensure that UBO, sanctions, PEP, adverse media and source of funds risks are assessed before acceptance
- Support consistent escalation and approval of higher-risk relationships
- Ensure that unacceptable risks are rejected or terminated in a timely manner
- Maintain accurate, complete and auditable records of Client acceptance decisions

2. SCOPE

This Policy applies to all individual and corporate Clients, prospective Clients, counterparties, suppliers, intermediaries, Business Partners and Third Parties seeking to establish or maintain a business relationship with GoldTakas FZCO.

This Policy applies to:

- Client onboarding
- Client risk assessment and classification
- Client acceptance and rejection decisions
- Continuation or termination of existing business relationships
- UBO identification and verification
- Source of Funds and Source of Wealth assessment
- Sanctions, PEP and adverse media screening
- Supply chain and responsible sourcing considerations
- Trigger-event reviews and periodic reassessments
- Escalation and Senior Management approval processes

This Policy applies to all UAE-booked transactions and all business relationships conducted by or on behalf of GoldTakas FZCO.

3. REFERENCE FRAMEWORK

This Policy has been prepared with reference to the following laws, regulations, guidance and internal policies:

- UAE Federal Decree-Law No. 10 of 2025 regarding Anti-Money Laundering, Combating the Financing of Terrorism and the Financing of Proliferation
- Applicable UAE executive regulations, cabinet decisions, implementing rules and any amendments or replacements thereto
- UAE Targeted Financial Sanctions framework, including UAE Local Terrorist List and United Nations sanctions obligations
- UAE FIU goAML registration and reporting obligations applicable to DNFBPs
- UAE requirements applicable to dealers in precious metals and stones, including DPMSR reporting obligations
- FATF Recommendations and FATF country lists
- United Nations Security Council Resolutions relating to sanctions, terrorist financing and proliferation financing
- DMCC AML/CFT requirements, responsible sourcing guidance and review expectations applicable to precious metals trading
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- GoldTakas FZCO's AML/CFT Policy
- GoldTakas FZCO's Risk Assessment and Scoring Policy
- GoldTakas FZCO's Anti-Bribery and Anti-Corruption Policy
- GoldTakas FZCO's Third-Party and Supply Chain Due Diligence procedures
- Wolfsberg Group financial crime compliance principles and due diligence standards, including the Correspondent Banking Due Diligence Questionnaire (CBDDQ) and Financial Crime Compliance Questionnaire (FCCQ), where relevant and proportionate to the nature of the counterparty or business relationship, as supplementary industry benchmarks and not as substitutes for applicable UAE legal or regulatory requirements.

4. DEFINITIONS

Client: Any individual or legal entity that establishes or seeks to establish a business relationship with GoldTakas FZCO.

Prospective Client: Any individual or legal entity being assessed for onboarding before formal acceptance.

Client Acceptance: The decision to establish a business relationship with a Client following completion of required due diligence and risk assessment.

Client Rejection: The decision not to establish a business relationship due to insufficient information, unacceptable risk or failure to meet onboarding requirements.

Client Continuation: The decision to maintain an existing business relationship following periodic or trigger-based review.

Client Termination: The decision to suspend or end an existing business relationship due to unacceptable risk, unresolved due diligence issues or compliance concerns.

CDD (Client Due Diligence): Standard measures used to identify and verify Clients and understand the purpose and intended nature of the business relationship.

EDD (Enhanced Due Diligence): Additional due diligence measures applied to higher-risk Clients, transactions or relationships.
UBO (Ultimate Beneficial Owner): The natural person who ultimately owns or controls a legal entity, whether directly or indirectly.
PEP (Politically Exposed Person): An individual who holds or has held a prominent public function, including their family members and close associates.
Source of Funds (SoF): The origin of funds used in a specific transaction.
Source of Wealth (SoW): The origin of a Client's overall wealth.
Sanctions: Financial, trade or other restrictions imposed by competent national or international authorities.
Targeted Financial Sanctions (TFS): Sanctions requiring the freezing of funds or assets and prohibiting the provision of funds or services to listed persons or entities.
Adverse Media: Negative news or publicly available information relating to a Client, UBO, Third Party or related person.
Red Flag: An indicator suggesting potential money laundering, terrorist financing, sanctions, fraud, bribery, corruption or other compliance risk.
Zero Tolerance: A risk category involving unacceptable risk where the business relationship must not be established or must be terminated.
High Risk Override: A risk factor that directly classifies the Client as high risk regardless of the calculated risk score.
Risk-Based Approach (RBA): An approach whereby controls, due diligence and monitoring are proportionate to the identified level of risk.
DPMSR: Dealers in Precious Metals and Stones Report submitted through goAML where applicable threshold reporting requirements are triggered.
goAML: The reporting platform used by the UAE Financial Intelligence Unit for regulatory reporting.
MLRO: Money Laundering Reporting Officer responsible for AML/CFT oversight, escalation review and regulatory reporting.
Compliance Function: The function responsible for overseeing implementation, monitoring and effectiveness of GoldTakas FZCO's compliance framework.
Third Party: Any external person or entity conducting business with or on behalf of GoldTakas FZCO.
CAHRA: Conflict-Affected and High-Risk Area.
Structuring: The practice of splitting transactions into smaller amounts to avoid detection, due diligence or reporting thresholds.

5. GOVERNANCE AND RESPONSIBILITIES

GoldTakas FZCO maintains a governance framework to ensure that Client acceptance decisions are controlled, documented and aligned with the Risk-Based Approach.

5.1 Senior Management

Senior Management is responsible for:

- Approving this Policy and overseeing its implementation
- Defining GoldTakas FZCO's risk appetite for Client acceptance
- Approving high-risk Client relationships where required
- Reviewing material Client acceptance, rejection or termination escalations

- Ensuring adequate resources are available for Client due diligence and compliance controls
- Promoting a culture of compliance, integrity and accountability

5.2 MLRO / Compliance Function

The MLRO / Compliance Function is responsible for:

- Overseeing the Client acceptance framework
- Reviewing Client risk assessments and escalations
- Determining whether EDD, rejection, termination or regulatory reporting is required
- Reviewing sanctions, PEP, adverse media and Red Flag findings
- Reviewing high-risk Client acceptance or continuation cases
- Escalating significant matters to Senior Management
- Maintaining Client acceptance, rejection and termination records
- Monitoring regulatory developments and recommending updates to this Policy

5.3 Operations / Onboarding Teams

Operations and Onboarding Teams are responsible for:

- Collecting required Client information and supporting documentation
- Conducting initial completeness checks
- Ensuring data entry is accurate and complete
- Performing initial screening and onboarding checks where assigned
- Identifying missing, inconsistent or unverifiable information
- Escalating onboarding concerns to the Compliance Function

5.4 Business Units

Business Units are responsible for:

- Providing relevant information regarding the purpose and nature of the proposed relationship
- Identifying unusual commercial arrangements or transaction expectations
- Escalating concerns relating to Client behavior, transaction rationale or business purpose
- Refraining from establishing or continuing a relationship before required approvals are obtained

5.5 Employees

All Employees are responsible for:

- Complying with this Policy and related procedures
- Reporting Red Flags or suspicious Client behavior without delay
- Avoiding any action that may bypass onboarding, screening or approval requirements
- Cooperating with due diligence reviews and compliance assessments

6. CLIENT ACCEPTANCE PRINCIPLES

GoldTakas FZCO shall only establish or maintain business relationships where the Client’s identity, ownership structure, business purpose, source of funds, risk profile and transaction rationale can be adequately understood and verified.

Client acceptance decisions shall be based on the following principles:

- No Client shall be accepted before completion of required due diligence
- Client acceptance shall be risk-based and documented
- Individual and corporate Clients shall be assessed using the applicable Risk Assessment and Scoring Policy
- UBOs, controlling persons, authorized signatories and relevant related parties shall be assessed where applicable
- Sanctions, PEP and adverse media screening shall be completed before acceptance
- Source of Funds and, where required, Source of Wealth shall be assessed
- High-risk relationships shall require Enhanced Due Diligence and appropriate approval
- Zero Tolerance / Red Flag cases shall not be accepted
- Where information is incomplete, inconsistent or unverifiable, onboarding shall be suspended until the issue is resolved
- Where the risk cannot be adequately mitigated, the Client shall be rejected or the business relationship shall be terminated

No commercial pressure, revenue expectation or relationship consideration shall override AML/CFT, sanctions, anti-bribery, responsible sourcing or compliance requirements.

7. CLIENT ONBOARDING REQUIREMENTS

GoldTakas FZCO shall complete Client onboarding before establishing a business relationship or executing transactions where due diligence is required.

7.1 Individual Clients

For individual Clients, GoldTakas FZCO shall obtain and verify, as appropriate:

- Full legal name
- Valid identification document
- Passport or Emirates ID, where applicable
- Nationality and country of residence
- Residential address and supporting evidence where required
- Contact details
- Occupation or source of income
- Purpose and intended nature of the business relationship
- Expected transaction profile
- Source of Funds
- Source of Wealth where required based on risk
- Bank account details where relevant
- Sanctions, PEP and adverse media screening results

7.2 Corporate Clients

For corporate Clients, GoldTakas FZCO shall obtain and verify, as appropriate:

- Legal name and registration details
- Trade or commercial license

- Constitutional documents
- Articles or memorandum of association
- Registered address and operating address
- Ownership and control structure
- UBO declaration and supporting documentation
- Identification documents for UBOs and controlling persons
- Authorized signatory list and authorization documents
- Nature of business and expected transaction profile
- Source of Funds
- Source of Wealth where required based on risk
- Bank account details
- Supply chain and product origin information where relevant
- Sanctions, PEP and adverse media screening results

7.3 Additional Documentation

GoldTakas FZCO may request additional information or documentation where required by the Client's risk profile, transaction structure, geographic exposure, ownership structure, source of funds, supply chain risk or other compliance concern.

Onboarding shall not proceed where required documentation is not provided or cannot be verified.

8. CLIENT RISK ASSESSMENT AND CLASSIFICATION

Each Client shall be assessed and classified in accordance with GoldTakas FZCO's Risk Assessment and Scoring Policy.

Risk classification shall take into account, at a minimum:

- Client type and legal form
- Ownership and control structure
- UBO transparency
- PEP exposure
- Sanctions and adverse media findings
- Source of Funds and Source of Wealth
- Expected transaction size, frequency and structure
- Cash usage and non-banking payment channels
- Geographic exposure
- Sector and product risk
- Third-Party and supply chain risk
- Responsible sourcing and CAHRA exposure
- Any Red Flag or High Risk Override factor

Clients shall generally be classified as:

- Low Risk
- Medium Risk

- High Risk
- High Risk by Override
- Zero Tolerance / Rejected

Risk classification shall be documented and reviewed in accordance with the Risk Assessment and Scoring Policy.

9. PROHIBITED CLIENT CATEGORIES AND ZERO TOLERANCE / REJECTION CRITERIA

9.1 General Principle

GoldTakas FZCO shall not establish or maintain a business relationship with a Client where the relationship is prohibited under applicable law, falls within the Company's approved Zero Tolerance criteria, or is otherwise determined to be unacceptable in accordance with the Company's Risk Assessment and Scoring Policy.

The classification of a risk factor as a Zero Tolerance / Red Flag, High Risk Override or quantitative scoring factor shall be determined in accordance with the Risk Assessment and Scoring Policy. This Policy does not establish a separate or alternative risk classification methodology and shall not be interpreted as reclassifying a High Risk Override or quantitative scoring factor as a Zero Tolerance criterion.

Prohibited Clients shall be distinguished from High-Risk Clients. A High-Risk Client may be accepted where the relationship is legally permissible and the applicable Enhanced Due Diligence, Compliance Function review and Senior Management approval requirements have been satisfactorily completed. A Client falling within an applicable legal prohibition or Zero Tolerance criterion shall not be accepted.

No commercial consideration, revenue opportunity, strategic importance, relationship value or management sponsorship shall override an applicable legal prohibition or Zero Tolerance determination.

9.2 Categorically Prohibited Clients

Subject to the classification principles established under the Risk Assessment and Scoring Policy, GoldTakas FZCO shall not establish or maintain a business relationship with:

- Clients, Ultimate Beneficial Owners, controlling persons or other relevant parties that are subject to applicable sanctions or Targeted Financial Sanctions where the applicable legal measures prohibit the establishment or continuation of the relationship;
- persons or entities determined, in accordance with applicable sanctions requirements, to be acting for or on behalf of, or to be owned or controlled by, a prohibited or designated person or entity where the relevant restrictions apply;
- Clients that provide false, forged, fraudulently altered or deliberately misleading identification, corporate, financial, transactional, provenance, supply chain or other material information or documentation in circumstances meeting the Company's Zero Tolerance criteria;

- Clients that intentionally conceal or misrepresent their Ultimate Beneficial Owners, controlling persons, ownership or control structure, or the identity of the person on whose behalf they are acting;
- Clients in respect of whom reasonable suspicion, strong indicators or confirmed findings of terrorist financing, proliferation financing, organised crime or other serious criminal activity result in a Zero Tolerance determination under the Risk Assessment and Scoring Policy;
- Clients conducting activities requiring a licence, registration, permit or other regulatory authorisation where the required authorisation is absent, invalid or cannot be satisfactorily verified and the circumstances meet the Company's Zero Tolerance criteria;
- Clients or relationships falling within jurisdictional or sanctions-related prohibitions classified as Zero Tolerance under the Risk Assessment and Scoring Policy; and
- any other Client or business relationship that is prohibited under applicable UAE law, a binding direction of a competent authority, or the Company's formally approved Zero Tolerance criteria.

Enhanced Due Diligence, additional documentation, commercial justification or Senior Management approval shall not override an applicable legal prohibition or Zero Tolerance determination.

9.3 Inability to Complete Required Due Diligence

Where information or documentation required under applicable law or the Company's compliance framework is incomplete, inconsistent, unavailable or cannot initially be verified, the Client shall not automatically be classified as a Prohibited Client solely for that reason.

Onboarding or the relevant activity shall remain suspended while reasonable clarification, verification or Enhanced Due Diligence measures are undertaken in accordance with the Customer Due Diligence Procedure and the Risk Assessment and Scoring Policy.

Where mandatory Customer Due Diligence cannot ultimately be completed to the standard required by applicable law or Company policy, or where material risks cannot be satisfactorily understood or mitigated, the business relationship shall not be established or, in the case of an existing relationship, shall be subject to appropriate restriction, escalation or termination in accordance with applicable requirements.

Where the failure, refusal or inability to provide satisfactory information gives rise to reasonable grounds for suspicion, the matter shall be escalated to the MLRO / Compliance Function for assessment under the Suspicious Transaction Reporting Procedure.

9.4 High-Risk Clients Distinguished from Prohibited Clients

The existence of elevated risk shall not, by itself, render a Client prohibited or unacceptable.

Risk factors classified as High Risk Overrides under the Risk Assessment and Scoring Policy shall result in the Client being classified as High Risk and shall trigger the applicable Enhanced Due Diligence, Compliance Function review and Senior Management approval requirements.

Accordingly, factors such as PEP status, CAHRA exposure, complex or insufficiently transparent ownership structures, Source of Funds concerns requiring enhanced verification, or other circumstances classified as High Risk Overrides shall not automatically result in rejection unless:

- the circumstances separately meet a Zero Tolerance criterion;
- a legal or regulatory prohibition applies;
- mandatory Customer Due Diligence cannot be satisfactorily completed; or
- the identified risk cannot be adequately understood or mitigated within the Company's approved risk appetite.

A High-Risk Client may only be accepted where:

- the relationship is legally permissible;
- the nature and source of the identified risks have been adequately understood;
- required Enhanced Due Diligence has been satisfactorily completed;
- appropriate risk mitigation measures have been identified and documented;
- the Compliance Function has completed its review; and
- the required Senior Management approval has been obtained.

No Enhanced Due Diligence measure, mitigating factor or management approval may be used to override an applicable legal prohibition or Zero Tolerance criterion.

9.5 Institutional Counterparty Due Diligence and Wolfsberg Standards

Where GoldTakas FZCO establishes, maintains or reviews business relationships with banks, financial institutions or other institutional counterparties, internationally recognised financial crime compliance standards may be considered as supplementary sources of due diligence information where relevant and proportionate to the nature and risk of the relationship.

The Compliance Function may, where appropriate, consider the Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ), Financial Crime Compliance Questionnaire (FCCQ), equivalent institutional due diligence questionnaires, or information prepared in accordance with comparable recognised industry standards.

The use of such questionnaires or standards shall:

- supplement, and not replace, GoldTakas FZCO's own Customer Due Diligence, Ultimate Beneficial Ownership identification, risk assessment, sanctions screening, Enhanced Due Diligence and Client approval requirements;

- be proportionate to the nature, complexity and financial crime risk of the relevant counterparty relationship;
- be subject to appropriate review and verification where the information provided is material to the Client acceptance decision;
- not result in automatic acceptance solely because the counterparty has completed a Wolfsberg or equivalent questionnaire; and
- not override applicable UAE legal or regulatory requirements, the Risk Assessment and Scoring Policy, or the Company's approved risk appetite.
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The final Client acceptance decision shall remain the responsibility of GoldTakas FZCO and shall be based on the totality of relevant due diligence, risk and compliance information.

10. HIGH-RISK CLIENTS AND ENHANCED DUE DILIGENCE

High-risk Clients may be accepted or continued only where the risk is understood, justified, documented and subject to appropriate controls.

High-risk factors may include:

- Foreign PEP status or close association with a foreign PEP
- UBO cannot be fully verified or ownership structure lacks transparency
- Source of Funds is unexplained, unverifiable or inconsistent with the Client profile
- Significant adverse media or criminality concerns
- CAHRA exposure
- FATF grey-listed or higher-risk jurisdiction exposure
- Offshore or tax haven exposure
- High cash usage or non-banking transaction intensity
- Transactions inconsistent with declared business activity
- Supply chain traceability concerns
- Dealings with high-risk suppliers, intermediaries or Business Partners

EDD measures may include:

- Additional identity verification
- Enhanced UBO verification
- Detailed Source of Funds and Source of Wealth verification
- Additional adverse media and reputation checks
- More detailed assessment of transaction purpose and economic rationale
- Senior Management approval
- Enhanced monitoring

- Shorter review cycles
- Additional supply chain and provenance checks

High-risk Client acceptance or continuation shall require Compliance Function review and Senior Management approval where required.

11. SANCTIONS, PEP AND ADVERSE MEDIA SCREENING

GoldTakas FZCO shall conduct sanctions, PEP and adverse media screening before Client acceptance and during the business relationship.

Screening shall apply, where relevant, to:

- Individual Clients
- Corporate Clients
- UBOs
- Controlling persons
- Authorized signatories
- Directors and senior managers
- Counterparties
- Suppliers
- Intermediaries
- Relevant Third Parties and Business Partners

Screening shall include applicable UAE and United Nations lists and may include supplementary international sanctions and risk databases.

Where a potential match is identified, the matter shall be escalated to the Compliance Function.

Where a confirmed sanctions or TFS match is identified, GoldTakas FZCO shall apply applicable freezing, rejection, termination and reporting requirements in accordance with the AML/CFT Policy and applicable law.

A Client shall not be accepted until screening results have been reviewed and any relevant concerns have been resolved.

12. SOURCE OF FUNDS AND SOURCE OF WEALTH

GoldTakas FZCO shall assess the Source of Funds used in Client transactions and, where required based on risk, the Client's Source of Wealth.

SoF and SoW assessment shall be proportionate to the Client's risk profile, transaction size, transaction structure and identified Red Flags.

Verification may include, where appropriate:

- Salary or employment evidence
- Bank statements
- Business income records
- Financial statements
- Sale agreements
- Investment records
- Inheritance or donation documents
- Tax or income documentation
- Corporate financial documentation
- Other reliable and independent evidence

Unexplained, unverifiable or inconsistent SoF / SoW shall result in escalation and may lead to High Risk classification, rejection, suspension or termination.

13. TRANSACTION THRESHOLDS AND STRUCTURING RISK

GoldTakas FZCO shall assess transaction thresholds and transaction patterns as part of Client acceptance and ongoing monitoring.

Single or linked cash transactions of AED 55,000 or above shall be treated as high cash usage and shall trigger enhanced scrutiny and applicable reporting assessment.

Transactions below the threshold may still present risk where they:

- Occur with unusual frequency
- Appear linked or structured
- Lack clear economic rationale
- Are inconsistent with the Client profile
- Appear designed to avoid due diligence or reporting requirements

Structuring or suspected threshold avoidance shall be escalated to the Compliance Function.

Threshold reporting obligations shall not replace STR/SAR assessment. Where suspicion exists, STR/SAR obligations shall be assessed separately.

14. THIRD-PARTY, SUPPLIER AND SUPPLY CHAIN CONSIDERATIONS

For Clients, suppliers, counterparties or Business Partners involved in precious metals trading, GoldTakas FZCO shall consider Third-Party and supply chain risks as part of the Client acceptance process.

The assessment may include:

- Identification and verification of the supplier or counterparty
- Ownership and control assessment
- UBO verification
- Sanctions and adverse media screening

- Review of AML/CFT controls
- Review of licenses and regulatory status
- Assessment of source and origin of precious metals
- Chain of custody and traceability review
- CAHRA exposure assessment
- Refinery accreditation assessment where applicable
- Review of responsible sourcing documentation

Supply chains with unverifiable origin, lack of traceability, CAHRA exposure or links to sanctioned, criminal or high-risk parties shall be escalated and may result in rejection or termination.

Where higher-risk sourcing is identified, GoldTakas FZCO shall apply enhanced due diligence in line with responsible sourcing requirements and relevant internal procedures.

15. CLIENT ACCEPTANCE DECISION FRAMEWORK

Client acceptance decisions shall be made after completion of required due diligence, screening and risk assessment.

15.1 Low-Risk Clients

Low-risk Clients may be accepted following completion of standard CDD, basic screening and risk assessment. Low-risk Clients are subject to routine monitoring and periodic review.

15.2 Medium-Risk Clients

Medium-risk Clients may be accepted subject to additional verification, enhanced monitoring or additional documentation where required.

The Compliance Function may require further review depending on the nature of the risk indicators.

15.3 High-Risk Clients

High-risk Clients may be accepted only where:

- EDD has been completed
- The risk is understood and documented
- Appropriate mitigating controls are applied
- Compliance Function review has been completed
- Senior Management approval is obtained where required

High-risk Clients shall be subject to enhanced monitoring and shorter review cycles.

15.4 Rejected Clients

Clients falling within the Prohibited Client Categories or Zero Tolerance criteria specified in Section 9 and the Risk Assessment and Scoring Policy shall not be accepted.

A Client shall also be rejected where mandatory Customer Due Diligence cannot be satisfactorily completed, material information required for the assessment of the relationship remains materially unreliable or unverifiable after reasonable clarification efforts, or identified risks cannot be adequately understood or mitigated within the Company's approved risk appetite.

All rejection decisions and the material rationale supporting the decision shall be documented within the Company's approved compliance systems.

A decision to reject or terminate a Client relationship shall not, by itself, determine whether an STR/SAR is required. Where the circumstances giving rise to rejection or termination also create reasonable grounds for suspicion, the matter shall be separately escalated to the MLRO / Compliance Function for assessment in accordance with the Suspicious Transaction Reporting Procedure.

16. CONTINUATION, SUSPENSION AND TERMINATION

Client acceptance is not a one-time decision. Existing Clients shall be reviewed periodically and upon trigger events.

GoldTakas FZCO may suspend or terminate a business relationship where:

- Required information is not provided
- Previously provided information is found to be false or misleading
- UBO, SoF or SoW cannot be verified
- Sanctions, PEP or adverse media concerns arise
- The Client’s activity becomes inconsistent with the declared profile
- Supply chain or product origin risks become unacceptable
- The Client refuses to cooperate with due diligence or monitoring
- Continuing the relationship would exceed GoldTakas FZCO’s risk appetite

Where a relationship is suspended or terminated due to suspicious circumstances, the MLRO / Compliance Function shall assess whether STR/SAR reporting is required.

17. TRIGGER EVENTS AND PERIODIC REVIEW

Client risk profiles shall be reviewed periodically and when trigger events occur.

Trigger events may include:

- Significant change in transaction volume, frequency or pattern
- Increased cash usage
- New sanctions, PEP or adverse media findings
- Change in UBO, ownership or control structure
- New high-risk jurisdiction exposure
- New CAHRA or supply chain risk
- Unusual payment arrangements
- Suspicion of acting on behalf of another person
- Inconsistent, incomplete or unverifiable information

- Change in business activity or expected transaction profile
- Regulatory, audit or compliance findings

Where trigger events occur, the Client's risk profile shall be reassessed and the acceptance or continuation decision shall be reviewed.

18. REPORTING AND ESCALATION
Employees shall promptly escalate any Client acceptance concern, Red Flag, suspicious activity, sanctions match, UBO concern, SoF / SoW issue or supply chain concern to the Compliance Function.

The Compliance Function shall assess the matter and determine the appropriate action, which may include:
- Requesting additional information
- Suspending onboarding or transactions
- Applying EDD
- Reclassifying the Client's risk level
- Escalating to Senior Management
- Rejecting or terminating the relationship
- Submitting STR/SAR or other required regulatory reports where applicable

No Client shall be informed that an STR/SAR has been or may be submitted. Tipping-off is strictly prohibited.

19. RECORD KEEPING
GoldTakas FZCO shall maintain complete, accurate, accessible and auditable records relating to Client acceptance decisions.

Records shall include, where applicable:
- Client onboarding forms
- Identification and verification documents
- Corporate and UBO documents
- Source of Funds and Source of Wealth documentation
- Risk assessment and scoring records
- Screening results
- Due diligence and EDD records
- Acceptance, rejection, suspension and termination decisions
- Senior Management approvals
- Internal escalation records
- STR/SAR assessment records
- DPMSR records where applicable
- Supply chain and responsible sourcing documentation
- Periodic review and trigger-event reassessment records

All records shall be retained for a minimum of five (5) years from the end of the business relationship or the completion of the relevant transaction, whichever is later, unless a longer period is required by applicable laws, regulations, investigations, audits or legal holds.

Records shall be made available to competent authorities, regulators, auditors and authorized internal functions upon request and in accordance with applicable legal requirements.

20. TRAINING AND AWARENESS

GoldTakas FZCO shall provide training to relevant Employees on Client acceptance requirements.

Training shall cover, where relevant:

- Client onboarding requirements
- CDD and EDD
- UBO identification and verification
- Source of Funds and Source of Wealth assessment
- Sanctions, PEP and adverse media screening
- Red Flags and suspicious activity escalation
- AED 55,000 cash threshold and structuring risks
- DPMSR and STR/SAR escalation considerations
- Third-Party and supply chain due diligence
- Record keeping requirements

Training shall be provided upon joining and at least annually, or more frequently where required due to regulatory changes, role responsibilities or identified weaknesses.

Training records shall be documented and retained.

21. MONITORING AND REVIEW

The Compliance Function shall monitor the implementation and effectiveness of this Policy.

Monitoring may include:

- Review of onboarding files
- Review of rejected or suspended Clients
- Review of high-risk Client approvals
- Review of UBO verification quality
- Review of SoF and SoW documentation
- Review of sanctions, PEP and adverse media screening results
- Review of trigger-event reassessments
- Review of Third-Party and supply chain due diligence records
- Testing of record keeping and approval documentation
- Review of corrective actions and remediation plans

Significant findings, control weaknesses or material policy breaches shall be escalated to Senior Management.

This Policy shall be reviewed at least annually and whenever required due to regulatory changes, supervisory expectations, internal audit findings, business model changes or identified control weaknesses.

22. FINAL PROVISIONS

This Policy shall enter into force upon approval by Senior Management and shall remain effective until amended, replaced or withdrawn.

The MLRO / Compliance Function shall be responsible for the interpretation, implementation and ongoing administration of this Policy.

All Employees, Business Partners and Third Parties acting on behalf of GoldTakas FZCO are expected to comply with this Policy and support GoldTakas FZCO's commitment to responsible, ethical and compliant business relationships.

In cases of uncertainty regarding the application or interpretation of this Policy, guidance shall be sought from the MLRO / Compliance Function before any action is taken.