ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING POLICY

Company	GoldTakas FZCO
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This Policy shall be read in conjunction with GoldTakas FZCO's Risk Assessment and Scoring Policy, Client Acceptance 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 methodology set out in related policies, this Policy establishes the overall AML/CFT framework, governance responsibilities, core controls and operational requirements designed to prevent, detect and respond to money laundering, terrorist financing, proliferation financing and related financial crime risks arising from GoldTakas FZCO's business activities and relationships.

1. PURPOSE

The purpose of this Policy is to define the AML/CFT framework adopted by GoldTakas FZCO to identify, assess, mitigate, monitor and report money laundering, terrorist financing, proliferation financing and related financial crime risks.

This Policy supports GoldTakas FZCO's commitment to conducting precious metals trading activities in compliance with applicable UAE laws, DMCC requirements, FATF standards and relevant international guidance.

This Policy further aims to:

- Establish clear AML/CFT governance, responsibilities and controls
- Support the implementation of a Risk-Based Approach
- Define the core requirements for Client Due Diligence, Enhanced Due Diligence and ongoing monitoring
- Ensure timely identification, escalation and reporting of suspicious activity
- Ensure compliance with sanctions and Targeted Financial Sanctions requirements
- Support responsible sourcing and supply chain due diligence in precious metals trading
- Maintain accurate records and audit-ready compliance documentation

2. SCOPE

This Policy applies to all activities, transactions, Clients, counterparties, suppliers, intermediaries, Business Partners, Third Parties and Employees of GoldTakas FZCO within the scope of its precious metals trading activities.

The Policy covers, without limitation:

- Client onboarding and continuation decisions
- Client Due Diligence and Enhanced Due Diligence
- Ultimate Beneficial Owner identification and verification
- Source of Funds and Source of Wealth assessments
- Transaction monitoring and trigger-event reviews
- Sanctions and PEP screening
- Targeted Financial Sanctions controls
- Suspicious Transaction and Suspicious Activity reporting
- DPMSR and goAML-related reporting obligations
- Third-Party and supply chain due diligence
- Responsible sourcing controls
- Record keeping, training, monitoring and review

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

3. REFERENCE FRAMEWORK

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

- 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 the UAE Local Terrorist List and United Nations Security Council 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, guidance and review expectations applicable to precious metals trading
- DMCC Review Protocol and responsible sourcing guidance for precious metals
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- GoldTakas FZCO's Risk Assessment and Scoring Policy, Client Acceptance Policy, Anti-Bribery and Anti-Corruption Policy and other applicable internal policies and procedures

4. DEFINITIONS

AML: Anti-Money Laundering; measures designed to prevent, detect and report money laundering risks.
CFT: Counter-Terrorist Financing; measures designed to prevent, detect and report terrorist financing risks.
PF: Proliferation Financing; financing related to the proliferation of weapons of mass destruction and associated activities.
Money Laundering: The process of disguising the illegal origin of funds or assets to make them appear legitimate.
Terrorist Financing: The provision, collection or use of funds or assets for terrorist purposes or terrorist organizations.
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.
CDD (Client Due Diligence): Standard measures used to identify and verify Clients and understand the purpose and nature of the business relationship.
EDD (Enhanced Due Diligence): Additional due diligence measures applied to higher-risk Clients, transactions or relationships.
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.
STR/SAR: Suspicious Transaction Report or Suspicious Activity Report submitted to the UAE FIU through goAML where suspicious activity is identified.
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 the implementation, monitoring and effectiveness of the AML/CFT framework.
Third Party: Any external person or entity conducting business with or on behalf of GoldTakas FZCO.
CAHRA: Conflict-Affected and High-Risk Area.
Adverse Media: Negative news or publicly available information relating to a Client, Third Party or related person.
Red Flag: An indicator suggesting potential money laundering, terrorist financing, proliferation financing, sanctions, fraud or compliance risk.
Tipping-Off: Disclosing information that may prejudice an investigation or alert a person that an STR/SAR has been or may be filed.
Ongoing Monitoring: Continuous or periodic review of Client activity, transactions and risk indicators during the business relationship.
Risk-Based Approach (RBA): An approach whereby controls and monitoring are proportionate to identified risks.

5. GOVERNANCE AND RESPONSIBILITIES

GoldTakas FZCO maintains an AML/CFT governance framework to ensure that responsibilities are clearly assigned and that financial crime risks are managed effectively.

5.1 Senior Management

Senior Management is responsible for:

- Approving this Policy and overseeing its implementation
- Establishing and maintaining GoldTakas FZCO's AML/CFT risk appetite
- Ensuring adequate resources, systems and controls are available for AML/CFT compliance
- Reviewing significant AML/CFT matters, escalations and regulatory issues
- Approving high-risk relationships where required
- Promoting a culture of compliance, integrity and accountability

5.2 MLRO / Compliance Function

The MLRO / Compliance Function is responsible for:

- Implementing and maintaining the AML/CFT framework
- Overseeing Client Due Diligence, Enhanced Due Diligence and ongoing monitoring controls
- Reviewing escalated alerts, Red Flags and suspicious activity concerns
- Determining whether STR/SAR or other regulatory reports are required

- Submitting STR/SAR, DPMSR and other required reports through goAML where applicable
- Monitoring sanctions, PEP and adverse media screening processes
- Coordinating AML/CFT training and awareness activities
- Maintaining AML/CFT records and compliance registers
- Reporting significant AML/CFT matters to Senior Management
- Monitoring legal, regulatory and supervisory developments and recommending policy updates

5.3 Employees
All Employees are responsible for:
- Complying with this Policy and applicable AML/CFT procedures
- Conducting business activities in accordance with internal controls and ethical standards
- Completing required AML/CFT training
- Identifying and promptly escalating Red Flags, unusual activity or suspicious conduct
- Cooperating with internal reviews, investigations and compliance assessments
- Avoiding any action that may result in tipping-off

5.4 Business Units
Business Units are responsible for:
- Collecting accurate Client information and supporting documentation
- Ensuring that onboarding and transaction information is complete and reliable
- Identifying unusual Client behavior or transaction patterns
- Escalating relevant concerns to the Compliance Function without delay
- Supporting ongoing monitoring, periodic reviews and remediation actions

5.5 Third Parties and Business Partners
Third Parties and Business Partners acting on behalf of GoldTakas FZCO are expected to:
- Comply with applicable AML/CFT, sanctions and financial crime requirements
- Cooperate with due diligence and monitoring processes
- Provide accurate and complete information when requested
- Notify GoldTakas FZCO of any material compliance concerns, sanctions exposure or integrity issues

6. RISK-BASED APPROACH
GoldTakas FZCO adopts a Risk-Based Approach to identify, assess, mitigate and monitor AML/CFT risks across Clients, products and services, transactions, geographic exposures, delivery channels, Third Parties and the supply chain.

The intensity of controls is proportionate to the nature and level of identified risk.

GoldTakas FZCO applies its Risk Assessment and Scoring Policy to classify Clients and relationships as low, medium or high risk and to determine the appropriate level of due diligence, monitoring and review.

6.1 Core Principles
GoldTakas FZCO applies the following principles:

- Each Client and transaction is assessed based on risk
- Higher-risk Clients and transactions are subject to Enhanced Due Diligence
- Zero Tolerance and High Risk Override factors are assessed separately from scoring factors
- Risk assessments are updated at onboarding, periodically and upon trigger events
- Geographic, sectoral, product, transaction and Third-Party risks are considered holistically
- Risk mitigating factors may be considered only where permitted under the Risk Assessment and Scoring Policy
- Material risks are escalated to the Compliance Function and, where appropriate, Senior Management

6.2 Key Risk Factors

GoldTakas FZCO considers, at a minimum, the following AML/CFT risk factors:

- Client type, ownership and control structure
- UBO transparency and verification
- PEP status or close association with PEPs
- Sanctions, TFS or adverse media exposure
- Source of Funds and Source of Wealth
- Cash intensity and non-banking transaction channels
- Transaction size, frequency, structure and economic rationale
- Geographic exposure, including FATF-listed jurisdictions, offshore jurisdictions and CAHRA regions
- Sectoral exposure, including high-risk sectors and cash-intensive businesses
- Precious metals origin, provenance and supply chain traceability
- Third-Party and Business Partner risk

7. CLIENT DUE DILIGENCE AND ENHANCED DUE DILIGENCE

GoldTakas FZCO shall conduct Client Due Diligence before establishing a business relationship and where required during the course of the relationship.

CDD measures shall be sufficient to identify and verify the Client, understand the purpose and intended nature of the business relationship, and assess the Client's AML/CFT risk profile.

7.1 CDD Triggers

CDD shall be conducted, at a minimum:

- Before establishing a business relationship
- Before onboarding any individual or corporate Client
- For occasional transactions meeting applicable regulatory or internal thresholds
- For cash or linked transactions of AED 55,000 or above
- For wire transfers meeting applicable regulatory thresholds
- Where there is suspicion of money laundering, terrorist financing, proliferation financing or other financial crime
- Where there are doubts regarding the accuracy, adequacy or validity of previously obtained information
- Where a trigger event requires reassessment of the Client's risk profile

7.2 CDD Requirements for Individual Clients
For individual Clients, GoldTakas FZCO shall obtain and verify, as appropriate:
- Full name and identification details
- Valid identification document
- Nationality and residence information
- Address information
- Contact details
- Purpose and intended nature of the business relationship
- Source of Funds and, where required, Source of Wealth
- Expected transaction profile
- Sanctions, PEP and adverse media screening results

7.3 CDD Requirements for Corporate Clients
For corporate Clients, GoldTakas FZCO shall obtain and verify, as appropriate:
- Legal name and registration details
- Trade or commercial license
- Constitutional documents
- Registered and operating address
- Ownership and control structure
- UBO information and supporting documentation
- Authorized signatories and representatives
- Nature of business and expected transaction profile
- Source of Funds and, where required, Source of Wealth
- Supply chain and Third-Party information where relevant
- Sanctions, PEP and adverse media screening results

7.4 Ultimate Beneficial Ownership
GoldTakas FZCO shall identify and verify the Ultimate Beneficial Owners of corporate Clients and legal arrangements.

Where the UBO cannot be identified or the ownership and control structure is not sufficiently transparent, the matter shall be treated as a High Risk Override in accordance with the Risk Assessment and Scoring Policy.

Intentional concealment or misleading information relating to UBOs shall be treated as a Zero Tolerance / Red Flag matter.

UBO information shall be kept accurate, up to date and supported by relevant documentation.

7.5 Enhanced Due Diligence
EDD shall be applied where elevated AML/CFT risk is identified.

EDD measures may include:
- Additional identity and ownership verification

- Enhanced Source of Funds and Source of Wealth verification
- Additional information on the purpose and nature of the business relationship
- Senior Management approval
- Enhanced screening and adverse media review
- More frequent Client information updates
- Increased transaction monitoring
- Additional supply chain and provenance checks
- Periodic review at shorter intervals

EDD shall be mandatory for high-risk Clients and may be required for medium-risk Clients depending on the risk indicators identified.

8. SANCTIONS, PEP AND TARGETED FINANCIAL SANCTIONS CONTROLS

GoldTakas FZCO shall screen Clients, UBOs, controlling persons, authorized signatories, counterparties, Third Parties and relevant Business Partners against applicable sanctions, PEP and adverse media sources.

Screening shall be conducted:

- During onboarding
- On an ongoing basis throughout the business relationship
- Upon trigger events
- Before processing higher-risk transactions where appropriate
- When sanctions lists or relevant data sources are updated

8.1 Sanctions and TFS Screening

GoldTakas FZCO shall screen against applicable sanctions and TFS lists, including the United Nations sanctions lists and UAE Local Terrorist List.

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

The Compliance Function shall determine whether the match is a false positive or a confirmed match.

Where a confirmed sanctions or TFS match is identified, GoldTakas FZCO shall:

- Freeze funds or assets without delay where legally required
- Cease or reject the relevant transaction or business relationship
- Avoid prior notice to the listed person or entity where prohibited
- Notify the relevant competent authority within applicable timelines
- Maintain records of the assessment, decision and notification
- Ensure no funds, assets or services are made available to listed persons or entities

8.2 PEP Screening

GoldTakas FZCO shall identify and assess PEP exposure as part of the Client risk assessment process.
Foreign PEPs shall be treated as High Risk Override factors.

Domestic PEPs and PEPs associated with international organizations shall be assessed under a risk-based approach, taking into account the Client's overall risk profile, position, exposure and transaction behavior.

Where PEP exposure is identified, appropriate EDD measures and approvals shall be applied.

8.3 Proliferation Financing And Country-Specific Proliferation Risk Controls
GoldTakas FZCO recognises that Proliferation Financing ("PF") risk may arise not only through direct dealings with designated persons or entities, but also through indirect ownership or control structures, intermediaries, third-country arrangements, trade transactions, payment chains, shipping routes, supply chains and other mechanisms designed to conceal or facilitate prohibited activity.

The Company shall identify, assess and mitigate PF risk as an integral component of its Risk-Based Approach and shall give particular consideration to applicable United Nations Security Council ("UNSC") sanctions regimes relating to the proliferation of weapons of mass destruction, including those concerning the Democratic People's Republic of Korea ("DPRK") and Iran, as amended or replaced from time to time.

PF risk assessment shall not be limited to the country of incorporation or residence of the Client or counterparty. Where relevant, GoldTakas FZCO shall consider direct and indirect geographic, ownership, transactional and commercial connections involving Clients, Ultimate Beneficial Owners, controlling persons, counterparties, financial institutions, intermediaries, suppliers, refineries, logistics providers, vessels and other material participants in the relevant transaction or supply chain.

Indicators of elevated PF risk may include, without limitation:

- direct or indirect exposure to persons, entities, jurisdictions or activities subject to applicable proliferation-related sanctions or Targeted Financial Sanctions;
- the use of shell companies, front companies, nominee arrangements, intermediaries or complex ownership structures that appear designed to obscure the identity, ownership, control or involvement of relevant parties;
- reluctance or inability to provide satisfactory information regarding beneficial ownership, end-users, end-use, destination, counterparties or the commercial purpose of a transaction;
- payment, trade or shipping structures that are unnecessarily complex or inconsistent with the Client's known business activities;
- material inconsistencies between invoices, shipping documents, customs information, payment instructions, product descriptions, origin, destination or other commercial records;
- unusual transshipment, re-export, diversion or third-country arrangements lacking a clear and legitimate commercial rationale;

- transactions involving dual-use goods, export-controlled goods, sensitive technologies, military-related goods or associated supply chains that are inconsistent with the Client's stated business profile or technical capability;
- transactions or business relationships involving persons or entities subject to export-control restrictions or other proliferation-related restrictions;
- unexplained changes to counterparties, beneficial owners, banks, payment routes, shipping routes, end-users or destination countries following sanctions or compliance enquiries;
- activity suggesting that precious metals may be used as a store of value, settlement mechanism, means of cross-border value transfer or other financial instrument to facilitate sanctions evasion or proliferation-related activity;
- apparent attempts to conceal the ultimate beneficiary, economic purpose or source and destination of funds, goods or precious metals; and
- circumstances indicating possible indirect ownership, control or acting-on-behalf-of relationships involving designated persons or entities.

GoldTakas FZCO shall not rely solely on name-based sanctions screening when assessing PF risk. Where appropriate, the Company shall consider the totality of available information, including Customer Due Diligence, beneficial ownership and control information, geographic exposure, transaction behaviour, payment flows, trade documentation, shipment and logistics information, supply chain data, provenance information and sanctions screening results.

Where PF risk, sanctions evasion or possible circumvention of applicable Targeted Financial Sanctions is identified, the matter shall be escalated without delay to the MLRO / Compliance Function before the relevant transaction or business activity proceeds, where legally and operationally appropriate.

The MLRO / Compliance Function shall determine the appropriate course of action, which may include Enhanced Due Diligence, additional verification, suspension or rejection of the relevant transaction or relationship, application of measures required under applicable Targeted Financial Sanctions legislation, and regulatory reporting or notification where required.

Confirmed sanctions or TFS matches shall be handled in accordance with Section 8.1 of this Policy and the Company's applicable Sanctions Screening Procedure. Where the circumstances also give rise to suspicion of money laundering, terrorist financing, proliferation financing or other financial crime, the matter shall be assessed separately under Section 10 and the Company's Suspicious Transaction Reporting Procedure.

9. TRANSACTION MONITORING AND ONGOING MONITORING

GoldTakas FZCO shall monitor Client activity and transactions to detect unusual, inconsistent or suspicious behavior.

Monitoring shall be conducted in line with the Client's risk profile, declared business activity, expected transaction behavior and applicable regulatory requirements.

9.1 Monitoring Focus Areas

Monitoring shall include, as appropriate:

- Transaction size, frequency and pattern
- Cash usage and non-banking payment channels
- Linked or structured transactions
- Cross-border transactions
- Changes in Client behavior
- Transactions inconsistent with the Client profile
- Unusual Third-Party payments
- Unusual supply chain or product origin information
- CAHRA, FATF grey list or offshore exposure
- Sudden changes in UBO, ownership or control
- New sanctions, PEP or adverse media findings

9.2 Trigger Events

The Client's risk profile shall be reassessed where trigger events occur, including:

- Significant change in transaction behavior
- Unusual increase in cash usage
- Suspicion of acting on behalf of another person
- New adverse media or sanctions exposure
- New PEP status
- Change in UBO or ownership structure
- New high-risk geographic exposure
- Incomplete, inconsistent or unverifiable Client information
- Supply chain traceability concerns
- Unexplained or unverifiable Source of Funds

Where required, EDD shall be applied and the matter shall be escalated to the Compliance Function.

9.3 Precious Metals-Specific Financial Crime Typologies And Red Flags

GoldTakas FZCO recognises that precious metals possess characteristics that may increase their vulnerability to financial crime, including high value, liquidity, portability, fungibility, international marketability and the ability to transfer or preserve value outside traditional financial channels.

Accordingly, the Company shall consider financial crime typologies and Red Flags that are particularly relevant to the precious metals sector as part of Client onboarding, transaction monitoring, ongoing monitoring, Third-Party due diligence, supply chain due diligence and responsible sourcing controls.

Relevant indicators may include, without limitation:

- concealment or misrepresentation of the true origin, provenance, ownership, custody, movement or destination of gold or other precious metals;
- suspected smuggling, undeclared cross-border movement or transportation of precious metals outside normal or documented commercial channels;
- over-invoicing, under-invoicing, multiple invoicing, false invoicing or other manipulation of price, quantity, weight, purity, quality, description or value;
- pricing materially inconsistent with prevailing market conditions without a reasonable commercial explanation;
- discrepancies between contractual parties, invoicing parties, payment parties, beneficiaries, consignors, consignees or other participants without a clear economic rationale;
- payments made by or to unrelated Third Parties without a legitimate and documented commercial justification;
- the use of multiple intermediaries, entities, jurisdictions, bank accounts or payment channels in a manner that appears designed to layer, obscure or disconnect funds from their true source, beneficiary or economic purpose;
- circular, back-to-back or rapidly repeated transactions involving the same or substantially similar precious metals without a reasonable commercial purpose;
- transaction volumes, values, frequency or settlement patterns inconsistent with the Client's known business model, financial capacity, expected transaction profile or historical activity;
- material inconsistencies between invoices, assay reports, refinery documentation, shipping records, customs documentation, provenance records, chain-of-custody information or other supporting commercial documentation;
- forged, altered, misleading, unverifiable or contradictory documents relating to refinery, assay, origin, provenance, transportation, customs clearance, ownership or supply chain participants;
- unexplained changes to the declared mine, country of origin, refinery, supplier, beneficial owner, consignee, destination or other material supply chain participant;
- the use of third-country routing, transshipment, intermediaries or re-export structures that appear designed to obscure the true origin or destination of precious metals;
- precious metals originating from or passing through Conflict-Affected and High-Risk Areas ("CAHRAs") without sufficient and reliable evidence of legitimate origin, chain of custody and responsible sourcing;
- reluctance or refusal by a Client, supplier or counterparty to disclose material participants in the supply chain, including mines, refiners, traders, exporters, importers, logistics providers or other intermediaries;

- unexplained differences between the physical characteristics of precious metals, including weight, purity, refinery mark or other identifiers, and the corresponding documentary or transactional records;
- repeated or unusual use of scrap, doré, unrefined material or other forms of precious metals presenting heightened provenance or traceability risk;
- unusual settlement arrangements involving cash, non-banking channels, unrelated Third Parties or jurisdictions having no apparent connection to the underlying trade;
- transactions structured in a manner that appears designed to avoid Customer Due Diligence, reporting, sanctions, customs, responsible sourcing or other regulatory controls; and
- transactions for which the movement of funds, movement of goods and stated commercial rationale cannot be reconciled on a reasonable and documented basis.

The presence of one or more of these indicators does not, by itself, establish that money laundering, terrorist financing, proliferation financing, sanctions evasion, smuggling or other criminal activity has occurred.

However, such indicators shall be assessed in the context of the Client's overall risk profile and the surrounding facts and circumstances. Depending on the nature and significance of the identified concern, the Company may require additional enquiries, Enhanced Due Diligence, Source of Funds or Source of Wealth verification, enhanced provenance and supply chain checks, additional transaction monitoring, suspension or rejection of the relevant transaction, or escalation to the MLRO / Compliance Function.

Where reasonable grounds for suspicion arise, the matter shall be handled in accordance with Section 10 of this Policy and the Company's Suspicious Transaction Reporting Procedure.

10. SUSPICIOUS TRANSACTION AND ACTIVITY REPORTING

All Employees shall promptly escalate actual or suspected money laundering, terrorist financing, proliferation financing or other suspicious activity to the MLRO / Compliance Function.

Suspicion does not require definitive proof. Reasonable suspicion is sufficient to trigger internal escalation and review.

GoldTakas FZCO maintains a centralized Compliance reporting channel at compliance.ae@goldtakas.com for the reporting of AML/CFT concerns, suspicious activities, sanctions-related concerns and other financial crime matters. Employees, Business Partners and relevant Third Parties are encouraged to report concerns promptly through this channel.

10.1 Internal Escalation

Employees shall report suspicious activity without delay through the internal reporting process.

The MLRO / Compliance Function shall assess the report, request further information where required and determine whether a regulatory report must be filed.

All internal assessments, decisions and rationales shall be documented.

10.2 STR/SAR Filing

Where suspicion is established, GoldTakas FZCO shall submit an STR/SAR through goAML without delay and in accordance with applicable regulatory requirements.

The decision to file, or not to file, shall be documented with supporting rationale.

10.3 Tipping-Off Prohibition

GoldTakas FZCO prohibits tipping-off.

No Employee, Business Partner or Third Party shall disclose to a Client or any unauthorized person that:

- A suspicion has been raised
- An internal investigation is ongoing
- An STR/SAR has been or may be filed
- Regulatory authorities have been or may be notified

Any concern regarding tipping-off shall be escalated immediately to the Compliance Function.

11. DPMSR AND THRESHOLD REPORTING

As a dealer in precious metals and stones, GoldTakas FZCO shall comply with applicable DPMSR and threshold reporting obligations.

Where qualifying transactions meet applicable reporting criteria, GoldTakas FZCO shall submit the required report through goAML within the prescribed timeframe.

GoldTakas FZCO shall maintain supporting documentation, identification records and reporting acknowledgements relating to DPMSR submissions.

Threshold reporting does not replace the obligation to assess suspicious activity. Where suspicion exists, STR/SAR obligations shall be assessed separately.

12. THIRD-PARTY AND SUPPLY CHAIN DUE DILIGENCE

GoldTakas FZCO recognizes that AML/CFT, sanctions, bribery, corruption and responsible sourcing risks may arise through Third Parties, suppliers, intermediaries and supply chain participants.

Third Parties and suppliers shall be subject to risk-based due diligence before engagement and periodically thereafter.

12.1 Due Diligence Measures
Due diligence measures may include:

- Identification and verification of the Third Party or supplier
- Ownership and control assessment
- UBO verification
- Sanctions and TFS screening
- PEP and adverse media review
- Review of AML/CFT policies and controls
- Assessment of regulatory status
- Assessment of audit history and compliance capability
- Review of supply chain traceability and provenance
- Assessment of CAHRA exposure
- Review of refinery accreditation where applicable

Business relationships shall not be established or continued where unacceptable AML/CFT, sanctions, supply chain or integrity risks are identified and cannot be mitigated.

12.2 Responsible Sourcing
GoldTakas FZCO shall consider responsible sourcing requirements in relation to precious metals.

Where relevant, GoldTakas FZCO shall assess:

- Origin of gold or precious metals
- Chain of custody documentation
- Traceability of supply chain participants
- CAHRA exposure
- Refinery accreditation
- Red Flags relating to conflict, human rights abuses, sanctions, corruption or criminal activity

Supply chains with unverifiable origin, lack of traceability or high-risk geographic exposure shall be treated as indicators of increased risk.

13. RECORD KEEPING
GoldTakas FZCO shall maintain complete, accurate, accessible and auditable AML/CFT records.

Records shall be maintained in a manner that supports regulatory compliance, internal review, auditability and timely retrieval.

The following records shall be retained, where applicable:

- Client identification and verification records
- CDD and EDD files
- UBO records
- Source of Funds and Source of Wealth documentation
- Risk assessments and scoring records
- Sanctions, PEP and adverse media screening results

- Transaction records
- Ongoing monitoring records
- Internal escalation records
- STR/SAR assessments and filings
- DPMSR submissions and acknowledgements
- TFS freezing and notification records
- Third-Party and supplier due diligence records
- Supply chain and responsible sourcing documentation
- Training records
- Governance, approval and audit records

All AML/CFT 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 retention 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.

14. TRAINING AND AWARENESS

GoldTakas FZCO shall provide AML/CFT training to Employees appropriate to their roles, responsibilities and risk exposure.

Training shall cover, where relevant:

- AML/CFT legal and regulatory obligations
- Risk-Based Approach
- Client Due Diligence and Enhanced Due Diligence
- UBO identification and verification
- Source of Funds and Source of Wealth requirements
- Sanctions, PEP and TFS screening
- Red Flags and suspicious activity identification
- Internal escalation procedures
- STR/SAR and goAML reporting requirements
- DPMSR and threshold reporting obligations
- Tipping-off prohibition
- Record keeping requirements
- Third-Party and supply chain risk indicators
- Precious metals-specific money laundering, trade-based money laundering, smuggling, Third-Party payment, invoice manipulation and provenance-related Red Flags
- Proliferation Financing, sanctions evasion, dual-use and export-control risks, and relevant country-specific PF risk indicators

Training shall be provided:

- Upon joining GoldTakas FZCO
- At least annually
- Following material regulatory, policy or procedural changes
- Where additional training is required based on role, risk exposure or identified weaknesses

Training attendance, content and completion records shall be documented and retained.

15. MONITORING, INDEPENDENT REVIEW AND AUDIT

GoldTakas FZCO shall maintain monitoring and review processes to assess the effectiveness of its AML/CFT framework.

The Compliance Function shall monitor the implementation of this Policy and identify areas requiring improvement, remediation or enhanced controls.

Monitoring and review activities may include:

- Periodic compliance reviews
- Review of CDD and EDD files
- Review of high-risk Client approvals
- Review of sanctions and TFS screening processes
- Review of STR/SAR and DPMSR processes
- Review of transaction monitoring alerts and escalations
- Review of Third-Party and supply chain due diligence records
- Testing of record keeping and training controls
- Assessment of regulatory changes and supervisory expectations
- Monitoring of corrective actions

Independent audit or testing shall be conducted periodically to assess the adequacy and effectiveness of AML/CFT policies, procedures, systems and controls.

Significant findings, control weaknesses, regulatory concerns and material compliance incidents shall be escalated to Senior Management.

16. SANCTIONS, DISCIPLINARY MEASURES AND BREACHES

Failure to comply with this Policy may result in disciplinary, contractual, legal or regulatory action, as appropriate.

Potential consequences may include:

- Internal disciplinary action
- Termination of employment
- Termination of business relationships
- Suspension or rejection of transactions
- Escalation to Senior Management
- Reporting to competent authorities where legally required
- Regulatory penalties or other enforcement measures

GoldTakas FZCO shall take appropriate corrective action where policy breaches, control weaknesses or compliance deficiencies are identified.

17. REVIEW AND UPDATE

This Policy shall be reviewed at least annually and whenever required due to:

- Changes in applicable laws or regulations
- Changes in UAE AML/CFT, TFS, UBO, goAML, DPMSR or DMCC requirements
- FATF updates or relevant international guidance
- Material changes in GoldTakas FZCO's business model or risk exposure
- Internal audit findings or compliance reviews
- Regulatory findings or supervisory expectations
- Identified control weaknesses or compliance incidents

Any amendments to this Policy shall be documented, subject to appropriate approval processes and communicated to relevant stakeholders.

18. 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 preventing money laundering, terrorist financing, proliferation financing and related financial crime risks.

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.