



# PROMISE GOLD REFINERY FZC

## AML-CFT POLICY RULE BOOK

Version Rev 02.0B.2024





## TABLE OF CONTENTS

SL NO	DETAILS	PAGE NUMBER
1.	Statement of Corporate Philosophy	
2.	Introduction	
3	Regulatory Guidelines	
3.1	Local Regulations /Circulars/Guidelines	
3.2	International Legislative Framework	
4	Objective and Scope	
5	Definitions	
6.	Roles and Responsibilities of Compliance Officer	
7.	Roles and Responsibilities of The Business Owner	
8.	Risk Based Approach to ML/TF/PF	
9.	Know your customers (KYC), Identity and Verification	
10	Due Diligence	
10.1	Enhanced Due Diligence (EDD)	
10.2	Standard and Simplified Due Diligence (SDD)	
11	Customer Risk Assessment	
12.	UAE FIU Reporting	
12.1	Suspicious Activity Reporting/Suspicious Transaction Reporting	
12.2	Dealers in Precious Metals and Stones Report (DPMSR)	
12.3	Partial Name Match Report & Funds Freeze Report	
12.4	High Risk Country Transaction and Activity Report	
13.	Targeted Financial Sanctions (TFS)	
14.	Training and Awareness	
15.	Record Retention	
16.	Red Flags Identification based on National Risk Assessment	
17.	Non-Compliance	
18.	Administrative Penalties against Violation	
19.	Appendix	
20	Declarations -Account Opening Forms and Review Formats	



## STATEMENT OF CORPORATE PHILOSOPHY

At Promise Gold Refinery FZC our success is built upon the pillars of **customer-centric solutions**, ensuring **robust security** of our client's information and assets, sustainable **profitability**, strategic **growth**, relentless **competitiveness**, **dedication to achieving results**, and **meticulous attention to detail**.

We are unwavering in our commitment to the highest ethical standards. **We prioritize transparency in all our business dealings**, and our word is our bond. We strictly prohibit any transactions that are doubtful or lack transparency. We are fully committed to preventing money laundering, terrorism financing, and any criminal activity. All employees are responsible for upholding the highest ethical standards and strictly adhering to our company's policies and procedures, and all applicable regulatory requirements."

The unwavering integrity and steadfast commitment of each staff member are fundamental to our company's ability to deliver prompt, efficient, customer-focused, and discreet services.

- Promise Gold Refinery FZC fosters a high-performance culture by promoting teamwork, creating a positive and engaging work environment, and implementing a fair, performance-driven reward system.
- Promise Gold Refinery FZC is committed to equal opportunity for all employees, regardless of gender, and upholds the principle of fair compensation for fair work. We strive to be an attractive, caring, and equitable employer.
- Promise Gold Refinery FZC prioritizes rigorous compliance with legal and regulatory frameworks while consistently meeting customer requirements and capitalizing on market potential.
- Promise Gold Refinery FZC ensures that all operations are conducted in strict accordance with customer specifications and identified market opportunities, with a steadfast commitment to observing all relevant legal and regulatory rules and regulations.

Promise Gold Refinery FZC dedicated to delivering maximum value to its customers by providing a competitive portfolio of customized precious metals products and services, ensuring optimal returns for all stakeholders

The aforementioned objective is realized by cultivating a client perception of Promise Gold Refinery FZC as

- Efficient, swift, and courteous service.
- Impeccable, error-free customer service with prompt, fair, and amicable complaint resolution.
- Uncompromising security and confidentiality
- Offering a highly personalized and responsive customer experience.



## INTRODUCTION

Promise Gold Refinery FZC (the “Company”) is committed to adhere to and maintain the highest Anti-Money Laundering (AML), Countering Financing of Terrorism (CFT) and Counter Proliferation Financing (CPF) standards. In addition, Promise Gold Refinery FZC ensures to take adequate measure and prohibits its dealing with the Sanctioned individuals or entities. The Managing Director and all Promise Gold Refinery FZC employees are committed to protect Promise Gold Refinery FZC business, its customers and the industry from being misused for money laundering and/or terrorist financing or other illegal purposes.

## REGULATORY GUIDELINES

Promise Gold Refinery FZC (the “Company”) is a Bullion Refinery and dealer in precious stones and metals and considered as Dealers in Precious Metal and Stones (DPMS) within the purview of Designated Non-Financial Business and Profession (DNFBPs), regulated and supervised by the UAE Ministry of Economy (MoE). The policy requirements outlined in this document are based on the applicable statutory, regulatory requirements and guidance issued by International organizations (FATF), UAE competent authorities (the MoE, CBUAE, UAE FIU, EOCN) applicable to DPMSs:

## LOCAL REGULATIONS/CIRCULARS/GUIDELINES

1. **Federal Decree Law No. (20) of 2018** on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations.
2. **Federal Decree Law No (26) of 2021** to amend certain provisions of Federal Decree Law No (20) of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations.
3. **Cabinet Decision No. (10) of 2019**, Concerning the Implementing Regulation of Decree Law No (20) of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations.
4. **Cabinet Resolution No. 20 of 2019** concerning the UAE list of terrorists and implementation of UN Security Council decisions relating to preventing and countering financing terrorism and leveraging non-proliferation of weapons of mass destruction, and the relevant resolutions.
5. **Cabinet Decision No. (58) of 2020** Regulating the Beneficiary Owner Procedure.
6. **Cabinet Decision No (109) of 2023** regarding regulating the procedures of the beneficial owner.
7. **Cabinet resolution No (74) of 2020** Regarding Terrorism Lists Regulation and Implementation of UN Security Council Resolutions on the Suppression and Combating of Terrorism, Terrorist Financing, Countering the Proliferation of Weapons of Mass Destruction and its Financing and Relevant Resolutions.
8. **Cabinet Decision No (16) of 2021** regarding the Unified List of the Violations and Administrative Fines for the Said Violations of Measures to Combat Money Laundering and Terrorism Financing.
9. **Cabinet Resolution No. (24) of 2022** amending some provisions of Cabinet Resolution No. (10) of 2019 regarding the executive regulations of Federal Decree-Law No. (20) of 2018 regarding countering money laundering crimes and combating the financing of terrorism and the financing of illegal organizations.
10. Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations Guidelines for Designated Non-Financial Businesses and Professions issued by the Ministry of Economy in March 2021.
11. **Guidelines for Designated Non-Financial Businesses and Professions - Supplemental Guidance** for Dealers in Precious Metal and Stones issued by the Ministry of Economy in May 2019.



- 12. Guidance on Targeted Financial Sanctions** for FIs, DNFBPs and VASPs issued by the Executive Office for Control & Non-Proliferation (EOCN) in September 2022.
- 13. Decision of the Council of Ministers No. (45) of 2018** on the Executive Regulation of Federal Law No. (11) of 2015, on the Control and Stamping of the Trade in Precious Stones and Precious Metals.
- 14. Ministry of Economy Circulars** for DNFBPs and Dealers in precious Metal and stones.
- 15. Ministerial Decree No. (68) of 2024** Regarding Gold Refineries' adherence to the Policy of Due Diligence Regulations for Responsible Souring of Gold.
- 16. Cabinet Decision No (132) of 2023** regarding the administrative penalties imposed on violators
- 17. Cabinet Resolution No. (71) of 2024** Regulating Violations, Administrative Penalties Imposed on Violators of Measures for Confronting Money Laundering and Combating Financing of Terrorism Subject to the Control of Ministry of Justice and Ministry of Economy
- 18. Cabinet Decision No. 132 of 2023** on the Administrative Penalties Imposed on Violators of the Provisions of the Federal Decree-Law No. (20) of 2018 on Anti-Money Laundering, Combating the Financing of Terrorism, and Financing of Illegal Organizations.
- 19. Relevant Circulars and amendments** as issued from time to time including those from the UAE Executive office for control and non-proliferation.

## **INTERNATIONAL LEGISLATIVE FRAMEWORK**

**The United Nation:** The UN is the international organization with the broadest range of membership. The UN actively operates a program to fight money laundering; the Global Programme against Money Laundering (GPML), which is headquartered in Vienna, Austria, is part of the UN Office of Drugs and Crime (UNODC).

**The Financial Action Task Force (FATF):** The Financial Action Task Force (FATF) sets international standards and promotes effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system.

**Middle East and North Africa Financial Action Task Force (MENAFATF):** MENAFATF was established in 2004 as a FATF Style Regional Body (FSRB), for the purpose of fostering co-operation and co-ordination between the countries of the MENA region in establishing an effective system of compliance with those standards. The UAE is one of the founding members of MENA FATF.

## **OBJECTIVE AND SCOPE**

Promise Gold Refinery FZC is dedicated to the preservation of its integrity and the prevention of its exploitation for money laundering, terrorist financing, or other illegal activities through precious metals transactions with suppliers, customers, and associated parties. This policy is applicable to all staff, business relationships, counterparties, and customers, irrespective of the working environment. Suppliers are mandated to adopt and maintain AML/CFT practices consistent with relevant jurisdictional frameworks and to strictly prohibit any dealings with sanctioned individuals or entities.



## DEFINITIONS

### MONEY LAUNDERING

Money laundering is the term used to describe the process by which criminals disguise the original ownership and control of the proceeds of criminal conduct by making such proceeds appear to have derived from a legitimate source.

### TERRORIST FINANCING

Terrorist financing refers to activities that provide financing or financial support to terrorists. Transactions associated with terrorist financing tend to be in smaller amounts than is the case with money laundering. It may involve funds raised from legitimate sources, such as personal donations, profits from businesses and charitable organizations.

### SANCTIONS

Sanctions are political and economic decisions that are a part of diplomatic efforts by countries, multilateral or regional organizations against states or organizations, either to protect national security interests or to protect international law and defend against threats to international peace and security.

### STAGES OF MONEY LAUNDERING

There are three stages of Money Laundering:

**Placement:** During placement, “dirty” money derived from criminal activities is placed in the financial system whether such money arises from the purchase or sale of the precious metal or stone.

**Layering:** To conceal the illegal origin of the placed funds and thereby make them more useful to criminals, the funds must be moved, dispersed, and disguised. Layering is the process of disguising the source of the funds through layers of financial transactions.

**Integration:** Once the funds are layered and can no longer be traced back to their criminal origins, they are integrated into the financial system and now appear “clean” and available for use by criminals. If layering has been successful, integration places the laundered money back into the economy and financial system in such a way that they appear as clean and legitimate.

### ROLES AND RESPONSIBILITIES OF COMPLIANCE OFFICER

The Compliance Officer (CO) of Promise Gold Refinery FZC is responsible for the formation, implementation, management and compliance of the AML/CFT Compliance function with all legal and regulatory requirements and applicable guidance. The CO reports directly to the Business Owner on all matters related to AML & CFT, compliance and risk management. The CO has unrestricted access to all information in order to perform this role effectively and independently, without any interference from the Business Owner or other employees Promise Gold Refinery FZC

The CO of Promise Gold Refinery FZC has key responsibilities across the following areas:

#### A. AML/CFT Compliance:

- **Developing and Implementing Policies:**
  - Creating and updating AML/CFT policies and procedures tailored to the gold refinery's specific risks.
- **Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD):**
  - Overseeing the CDD and EDD processes for customers, suppliers, and other business partners.
  - Ensuring thorough KYC (Know Your Customer) and KYCC (Know Your Customer's Customer) checks.



- **Transaction Monitoring:**
  - Monitoring transactions for suspicious activity and red flags.
  - Implementing automated transaction monitoring systems where appropriate.
- **Suspicious Transaction Reporting (STR):**
  - Filing STRs with the UAE Financial Intelligence Unit (FIU) via the GoAML platform.
  - Conducting internal investigations of suspicious activities.
- **SANCTIONS SCREENING:**
  - Screening customers and transactions against sanctions lists (UN, UAE, OFAC, UKHTM and EU etc.).
  - Ensuring compliance with sanctions regulations.
- **RECORD KEEPING:**
  - Maintaining accurate and complete records of all compliance-related activities.

## B. REGULATORY COMPLIANCE:

- **Staying updated on regulations:**
  - Monitoring changes in UAE regulations (Ministry of Economy, FIU, etc.) and international standards (FATF).
  - Ensuring the refinery's compliance program is up-to-date.
- **Liaison with Authorities:**
  - Acting as the primary point of contact for regulatory authorities.
  - Responding to regulatory inquiries and audits.
- Implementing and maintaining compliance with Ministerial Decree No. (68) of 2024, for Due Diligence Regulations for Responsible Sourcing of Gold.
- Ensuring compliance with cabinet decision no (28m/4w) of 2019.

## C. Internal Compliance:

- **Risk Assessment:**
  - Conducting regular AML/CFT risk assessments to identify and mitigate potential risks.
- **Compliance Training:**
  - Developing and delivering AML/CFT training programs for employees.
  - Promoting a culture of compliance within the organization.
- **Internal Audits:**
  - Conducting internal audits to assess the effectiveness of the compliance program.
  - Identifying and addressing compliance gaps.
- **Policy Enforcement:**
  - Ensuring that all employees adhere to the company's internal compliance policies.
- **Supplier Due Diligence:**
  - Ensuring that all suppliers of gold are following correct ethical and legal practices

## D. Responsible Sourcing:

- **Due Diligence on the Gold Supply Chain:**
  - Implementing due diligence procedures to ensure responsible sourcing of gold.
  - Identifying and mitigating risks related to conflict gold, human rights abuses, and environmental damage.
- **Supply Chain Transparency:**
  - Promoting transparency in the gold supply chain.
  - Maintaining records of the origin of gold.



## ROLES AND RESPONSIBILITIES OF THE BUSINESS OWNER

The Business Owner (BO) of Promise Gold Refinery FZC is responsible for active participation, management, oversight and approval of all aspects of the Promise Gold Refinery FZC AML/CFT Program, in particular:

- Appoint a qualified CO in line with the requirements of the relevant Supervisory Authority.
- Put in place and monitoring the implementation of adequate management and information systems, internal controls, and policies, procedures to mitigate risks
- Ensure a robust and effective independent audit function is in place or take adequate measures to obtain the necessary capabilities from qualified external sources.
- Approve and endorse Promise Gold Refinery FZC internal AML/CFT Policies and Procedures and controls, related to areas such as:
  - Identification, assessment, understanding, management and mitigation of ML/TF risks.
  - Performance, review and updating of CDD (including EDD and SDD) measures.
  - Identification and implementation of indicators to identify STRs
  - Record retention and data protection.
  - Staff screening, training and development.
- Oversee the overall the AML/CFT Compliance Programme by:
  - Reviewing and providing comments in relation to the compliance officer's semi-annual reports to the relevant Supervisory Authority.
  - Approving the establishment and continuance of High-Risk Customer Business Relationships and their associated transactions, including those with PEPs;
  - Approving the establishment and continuance of Business Relationships involving high-risk countries;
  - Ensuring the adequate application of the appropriate components of the AML/CFT compliance programme to all branches and majority-owned subsidiaries, including those operating in foreign jurisdictions;
  - Ensuring the designated CO does not have day-to-day responsibility for sales and/or customer business relationship management;
  - Consider implementing additional measures in instances where there are significant challenges to ensure a clear and effective separation of AML/CFT responsibilities from those related to the day-to-day management of the business.
- Ensure complete, timely and accurate application of the directives of Competent authorities, by:
  - Applying the directives of Competent Authorities for implementing UN Security Council decisions under Chapter VII of the Charter of the United Nations, and other related directives, including Cabinet Decision (74) of 2020 Regarding Terrorism Lists Regulation and Implementation of UN Security Council Resolutions on the Suppression and Combating of Terrorism, Terrorists Financing & Proliferation of Weapons of Mass Destruction, and Related Resolutions.
  - Implementing CDD measures defined by the National Committee for Combating Money Laundering and the Financing of Terrorism and Illegal Organizations, regarding High-Risk Countries.

All employees of Promise Gold Refinery FZC are responsible to read, acknowledge and adhere to this policy in their day-to-day activities.



## RISK BASED APPROACH TO MONEY LAUNDERING /TERRORIST FINANCING / PROLIFERATION FINANCING

Promise Gold Refinery is committed to implementing a Risk-Based Approach (RBA) to Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) in compliance with relevant legislation, including AML-CFT Law Article 16.1 and AML-CFT Decision Article 4.1-3. This policy is designed to ensure that Promise Gold Refinery identifies, assesses, and understands its risks of money laundering (ML), terrorist financing (TF), and Proliferation Financing (PF) and adopts appropriate measures to mitigate those risks.

### RISK IDENTIFICATION AND ASSESSMENT

Promise Gold Refinery FZC recognizes that a comprehensive Risk-Based Approach (RBA) is essential for effective AML/CFT compliance. As such, Promise Gold Refinery FZC will implement the following approach:

- Identify the ML/TF risks based on our business nature, size, and complexity.
- Regularly assess these risks by using established criteria and risk factors as outlined in AML-CFT Law and AML-CFT Decision.
- Continuously update risk assessments to reflect new threats, vulnerabilities, or regulatory updates.

In order to implement RBA for effective AML/CFT Compliance and effective identification of ML/TF/PF risk, Promise Gold Refinery FZC will conduct an initial baseline business-wide ML/FT risk assessment across all business lines and processes, considering the following risk factors:

- **Customers** - Assess the ML/TF risks posed by customer types or relationships;
- **Products, services and transactions** - Evaluate risks linked to the nature of products, services, and types of transactions offered by Promise Gold Refinery FZC.
- **Delivery channels** - Identify risks related to the modes of service or product delivery;
- **Geographic locations, and any other risk factors** - consider the risks posed by the geographic areas where Promise Gold Refinery FZC operates or engages in transactions.

Promise Gold Refinery FZC will carry out follow-up assessments at least annually or more frequently as needed based on significant changes in business operations, risk factors, or regulatory requirements. Promise Gold Refinery FZC will regularly review and update the risk assessment methodology to account for any material changes or significant developments, including:

- Internal changes (e.g., business expansion, new products or services).
- External developments (e.g., regulatory changes, emerging risk typologies).
- Results of the UAE National Risk Assessment (NRA) or Topical Risk Assessments, ensuring these are integrated into the organization's risk management approach.

As part of the business-wide risk assessment, Promise Gold Refinery FZC will use identified inherent ML/FT risks as the basis for determining the nature and intensity of risk mitigation controls required across the organization and subsequently apply appropriate mitigation strategies and allocate resources commensurate with the identified risk levels to reduce potential exposure to ML/TF threats. The assessment of inherent ML/FT risks and of the effectiveness of the risk mitigation measures will result in a residual risk assessment. The residual risk assessment will help determine remaining risks. Upon the residual risk assessment, Promise Gold Refinery FZC will consider implementing additional controls to ensure it operates within acceptable risk levels and its business risk appetite.



## RISK ASSESSMENT METHODOLOGY

Promise Gold Refinery FZC will develop and utilize risk assessment methodology that is appropriate for the size and nature of its business, and the methodology will be based on the following principles:

- The assessment is based on both quantitative and qualitative data and information.
- Reflects Promise Gold Refinery FZC approved AML/CFT risk appetite and strategy.
- Takes into consideration input from relevant internal sources, relevant external information (such as ML/FT trends and sectoral risks)
- Describes the weighting of risk factors, the classification of risks and the prioritization of risks.
- Evaluates the likelihood or probability of occurrence of identified ML/FT risks and determining their timing and impact on Promise Gold Refinery FZC business.
- Considers whether the AML/CFT controls are effective, specifically whether there are adequate controls to mitigate risks concerning customers, products, services, or transactions.
- Determines the effectiveness of the AML/CFT risk mitigating measures in place by using information such as audit and compliance reports or management information reports.
- Determines the residual risk as a result of the inherent risks and the effectiveness of the AML/CFT risk mitigating measures.
- Establishes based on the residual risk and the risk appetite, whether additional AML/CFT controls have to be put in place.
- Determines the rationale and circumstances for approving and performing manual interventions or exceptions to model-based risk weightings or classifications.
- Is properly documented and maintained, regularly evaluated and updated, and communicated to management and relevant personnel within the organisation.
- Is tested and audited for the effectiveness and consistency of the risk methodology and its output with regard to statutory obligations.

Promise Gold Refinery FZC will document all risk assessments, including both inherent and residual risks, and will regularly review and report the results to senior management. The findings will guide decision-making related to resource allocation and risk mitigation strategies.

When conducting the business-wide ML/FT risk assessment, Promise Gold Refinery FZC will ensure that the assessment implements the following elements:

- Likelihood or Probability: Assess the likelihood of occurrence of each identified inherent ML/TF risk.
- Timing: Consider when these inherent risks are likely to materialize, whether in the near or distant future.
- Impact: Evaluate the potential impact of these inherent risks on the organization, including financial, operational, and reputational consequences.

Based on the assessment of likelihood, timing, and impact, Promise Gold Refinery FZC will:

- Classify identified risks into categories such as high, medium, or low, or use a more nuanced classification (e.g., medium-high or medium-low) where appropriate.
- Use this classification to prioritize ML/TF risks, ensuring that higher-risk areas receive greater attention and resources.

In keeping with the ever-evolving nature of ML/FT risks, Promise Gold Refinery FZC will remain vigilant and responsive to new risks and typologies as identified by national and international regulatory bodies, as well as industry reports and typology studies.



## CUSTOMER RISK

Promise Gold Refinery FZC will ensure that customer-related risk factors are included and properly assessed as a key component of the ML/TF/PF risk assessment. When assessing the customer risk factors with respect to the business-wide ML/FT risk assessment, Promise Gold Refinery FZC will take the following into account:

- Type of customer, including business relationships with complex legal, ownership structures, less transparent structures or similar;
- Customer base – consider the homogeneity of the customer base or customers based in or operating in growing or emerging markets;
- Maturity of relationship – Promise Gold Refinery FZC will assess the level of interactions with its customers considering occasional, one-off interactions vs. repetitive or long-term business relationships.

## GEOGRAPHIC RISK

Promise Gold Refinery FZC will consider geographic ML/FT risk factors covering the locations of Promise Gold Refinery FZC offices, branches and subsidiaries as well as locations of its customers and where they conduct their activities. Examples of factors to be considered include:

- Regulatory/supervisory framework of the countries where customers are based
- Regulatory / Supervisory framework
- Risk Rating of the country where the customer/ supplier is incorporated on the Know your country risk rating
- Applicability of International Sanctions on the country where the company is incorporated. (UN, UAE and OFAC, UKHTM and EU)
- Reputation
- Consistency with the customer's profile
- Confluence of geographic risks with customer risk

## PRODUCT, SERVICES AND TRANSACTIONAL RISK

Promise Gold Refinery FZC will assess products, services and transaction types to identify those more vulnerable to ML/TF abuse. Examples of factors to be considered include:

- Products, services and transaction types are associated with an established ML/TF typology;
- Complexity of products, services and transaction types;
- Transparency and transferability of products, services and transaction types;
- Size/value of products, services and transaction types.
- Volume of Cash Involved in The Transaction
- Third Party Payment Risk
- Mode of Payment Requested by the supplier and customer
- Country where the payments are requested to be made or made from.
- Unclear source of Funds for the Transactions

## DELIVERY CHANNEL-RELATED RISK

Promise Gold Refinery FZC will pay particular attention to delivery channels that favor anonymity. These channels include non-face-to-face channels (especially in cases where there are no safeguards in place such as electronic identification means), such as internet, phone, or other remote-access services or technologies; the use of third-party business introducers, intermediaries, agents or distributors; and the use of third-party payment, or other transaction intermediaries and completeness of documentation for the product delivered. Promise Gold Refinery FZC won't conduct non-face-to-face onboarding of customer and suppliers.



## OTHER RISK FACTORS

Promise Gold Refinery FZC will monitor and evaluate new and emerging risks, taking into consideration the results of the UAE annual thematic risk assessment, publications from official source, including from the supervisory authorities, the FIU, the FATF, MENAFATF, and other FCRBs, the Egmont Group and others.

## KNOW YOUR CUSTOMERS (KYC), IDENTITY AND VERIFICATION

Promise Gold Refinery FZC implements a comprehensive KYC program to ensure all customers, including natural and legal persons and legal structures, are subject to rigorous identification and monitoring measures. Verifying the identity of customers and beneficial owners through reliable, independent sources, and maintaining detailed records of all verification documents, is fundamental to our business relationships. We corroborate beneficial ownership information with independent sources.

Customers are informed that business transactions will not proceed without satisfactory identity verification, while adhering to our obligation to report suspicious transactions. In cases of initial verification failure or suspected false information, enhanced due diligence will be conducted, with detailed records maintained.

Promise Gold Refinery FZC maintains accounts only in the name of the account holder and prohibits anonymous, fictitious, or incorrect name accounts. All due diligence documentation is treated as true copies of the originals. The KYC form is designed to capture all essential Customer Due Diligence requirements.

## CUSTOMER DUE DILIGENCE (CDD)

All information and documents must be collected before entering into business relationship:

### NATURAL PERSONS:

- Applicant's full name (as per passport);
- Date and place of birth;
- Nationality;
- Physical Address (residential and business / home country and UAE);
- Contact details;
- Previous personal / business activities / occupation (type and volume);
- Anticipated type and volume of company's activities;
- Bank reference and introductory letter; and
- Source of funds

### Documents Required

- The passport and identity card (Emirates ID) of individual customers must be checked and a certified copy thereof must be maintained.
- List of non-exhaustive documents for example Driving license, Recent Utility bill, rates or council tax bill, Statement from a regulated bank, building society or credit card company, mortgage statement issued from a regulated lender, Salary Certificate from customer's current employer on a company letter head signed by the authorized person with company stamp, Tenancy Contract or Rental Agreement.
- The Company shall request individual applicants who present only photocopies of identifications and other documents to produce or show the original documents for verification purposes. The prospective customers shall be interviewed personally.



**The following checks shall be instituted for non-face-to-face prospective applicants and customer:**

- Telephone contact with the applicant at an independently verified home or business number;
- Subject to the applicant's consent, telephone verification of the applicant's employment with the employer's personnel department at a listed business number;
- Income or salary details appearing on recent bank statements, income tax returns or any other document evidencing income or compensation;
- Confirmation of the address through an exchange of correspondence or by other appropriate methods;
- An initial deposit drawn on another financial institution regulated by the CBUEA will provide additional assurance as to identity.

**CORPORATES**

- Incorporated name
- Shareholders and or controlling interest (in case applicant company being non-publicly traded);
- Ultimate beneficial owners (in case applicant company is not publicly-traded);
- Signatories Details
- Country of origin / UAE physical address (if applicable);
- Contact details
- Anticipated type and volume of activities;
- Audited financial statements
- Source of funds; and Source of Wealth

**DOCUMENT REQUIRED**

- Valid Registration Certificate, Trade & Regulatory License showing registration details.
- Valid VAT Certificate.
- Copy of the Memorandum of Association and Articles of Association showing the renewal date and all the partners including their shareholding pattern.
- Tenancy Contract of the Office to validate the names and addresses and official presence of the business
- Audited Financial Copy of the Firm to validate the source of wealth and source of funds, or
- Statement from a regulated bank,
- Certified copies of the identification document of Ultimate Beneficial owners, Corporate Organisation Chart etc
- Certified copies of the identification document of authorized signatories.
- Self-Attested copy of Tenancy Contract /utility bill of the UBO and shareholders name and residential address to validate the Residency Status.
- As for public shareholding companies, the names and addresses of the Chairman, members of the Board of Directors and shareholders whose holdings are in excess of 5% each.
- As for companies where the ownership has an involvement of Trust, we would require a copy of the Trust Deed, and Identification document of the Trustee (Nominal and Beneficial).
- Any additional documents as necessary for placement of any specific risks or carrying out additional diligence. List of non-exhaustive documents such as Recent Company Utility Bill



## TRUSTEE NOMINEE OR FIDUCIARY ACCOUNTS

Promise Gold Refinery FZC shall establish whether the applicant for business relationship is acting on behalf of another person as trustee, nominee or agent. Promise Gold Refinery FZC will obtain satisfactory evidence of the identity of such agents and authorized signatories, and the nature of their trustee or nominee capacity and duties.

Where the Compliance officer or Promise Gold Refinery FZC staff entertains doubts as to whether the trustee, nominee or agent is being used as a dummy in circumvention of existing laws, it shall immediately make further inquiries to verify the status of the business relationship between the parties. If satisfactory evidence of the beneficial owners cannot be obtained, the Promise Gold Refinery FZC shall consider whether to proceed with the business, bearing in mind the “Know-Your-Customer” principle.

Promise Gold Refinery FZC does not deal with shell companies or illegal organization or sanction individual or entities by UAE Sanctioned List or the UNSCR Consolidated List.

## DUE DILIGENCE

### Enhanced Due Diligence (EDD)

In addition to the CDD, enhanced due diligence is required for the High-risk customers including Politically Exposed Persons (PEPs) or in cases where the compliance has requested to perform enhanced due diligence as case may be. In ensuring carrying out enhanced due diligence Promise Gold Refinery FZC would:

- Increase scrutiny and will implement higher standards of verification and documentation from reliable and independent sources with regard to customer identity;
- Carry out more detailed inquiry and evaluation of reasonableness in regard to the purpose of the Business Relationship, the nature of the customer’s business, the customer’s source of funds and source of wealth, and the purpose of individual transactions;
- Increase supervision of the Business Relationship, including the requirement for owner approval, more frequent monitoring of transactions, and more frequent review and updating of customer due diligence information.
- EDD should also be applied where the Red flags has been identified (Refer Appendix 1 for list of Red Flags). In doing so Promise Gold Refinery FZC should ensure that it take reasonable measures to obtain adequate, substantiated, information about the customer, commensurate with the level of the risks identified.

## NATURAL PERSONS/INDIVIDUALS

- Obtain the information source of wealth and source of fund and verify by obtaining the Last three- month/Six-month Bank statements based on the risk assessment.
- Tax assessment documents or any other official correspondence issued by the central or local govt.
- Banking references;
- Domicile/ Residency Status
- Description of the customer’s primary trade area and whether international transactions are expected to be routine;
- Description of the business operations, the anticipated volume of currency and total sales, and a list of major customers and suppliers; and
- Explanations for changes in business activity



## CORPORATES

- Obtain the Source of Fund used in the transaction and verify using Audited Annual report/Financial Statement the annual income, Turnover etc. for the last three years.
- Obtain the name of the bank that the customer or the beneficiary deals with.
- Banking references;
- Domicile and Residency Status of the UBO , Shareholder and Director.
- Description of the customer's primary trade area and whether international transactions are expected to be routine;
- Description of the business operations, the anticipated volume of currency and total sales, and a list of major customers and suppliers; and

Compliance Officer has full discretion to request for any additional documentation to establish the identification of the Customer, Ultimate Beneficial Owner and/or the Source of Funds and the business relationship non-involvement into any conflict activity

## SIMPLIFIED DUE DILIGENCE (SDD)

Simplified due diligence is required if a customer is:

- Customer is from a Low-Risk Country
- Customers has well established Source of Funds
- In case of listed company where such information is available from the third-party sources such as audited financial statement of the listed company on their website or in case of legal entity beneficial owner where the customer is holding the controlling interest of the legal entity listed on the stock exchange.
- Cases that are internally assessed and documented for simplified due diligence from time to time.

## Sanction, PEP and Adverse Media Screening

- All business relationship be its sales or purchases, irrespective of the size of transaction or the method of payment should undergo screening against the Sanction Lists. In doing so, the Promise Gold Refinery FZC may utilize the off the shelf subscription-based database, publicly available UAE local Terrorist list or UNSCR Consolidated list, and third-party screening tools to identify any adverse information including association with the PEPs or with crimes.
- **All our approved customers and suppliers would be listed for ongoing screening on our Screening Tool.**
- Promise Gold Refinery FZC does not conduct any business relationship/transaction that are on the UAE Cabinet blacklist or on Call for Action jurisdictions and Sanctioned jurisdictions. In compliance with UN Security Council resolution No. 1730/2006 and pursuant to UAE Federal Law No. 7 of 2014, the UAE publishes the National Sanctions Blacklist containing the names of individuals and entities identified as terrorist and associated with proliferation of weapons of mass destruction
- (We also utilized the list obtained from Overview on UN Consolidated Sanctions List and National List of Terrorists |Committee for goods & material subjected to import & export ([uaeiec.gov.ae](http://uaeiec.gov.ae)). Promise Gold Refinery FZC Strictly does not deal with such Entities or Individuals.



## Acceptable Payments; Currency and Cash Equivalent Instruments

### Cash Transactions:

- Promise Gold Refinery FZC accepts cash-based transactions, only after completing our enhanced due diligence, we would be collecting the source of funds of the transactions. We would be collecting cash declaration forms from our counterparties to be compliant with the AML and CFT Regulations. We would be reporting all cash transactions above AED 55,000/- in GO AML FIU.

### Wire transfer/Credit Card Payment/Other Mode Cheque:

- All payment through this mode are subject to the Customer Due-Diligence and Enhanced Due-Diligence requirements based on Risk Categorization and mandatory Transactional Screening.

### Payment in form of Precious Metal:

- All payment originating in form of precious Metal or stone or in form or exchange transaction will be subject to the Enhanced Due Diligence Review for CDD and Supply Chain.

### All mode of payment by third parties:

- Promise Gold Refinery FZC does not accept or makes any form of Third-party Payments.

### Payment in form of Digital Assets/Crypto Currencies/NFT

- Promise Gold Refinery FZC does not accept any payment in form of the crypto or digital currency.

## Customer Risk Assessment

To assess the risk associated with each customer, Promise Gold Refinery FZC has classified the Risk category into the following:

- 1. Low-Risk Customers and Suppliers**
- 2. Medium -Risk Customers and Suppliers**
- 3. High-Risk Customers and Suppliers**
- 4. Prohibited Customers and Suppliers**

### **1. Low-Risk Customers and Suppliers**

This classification categorizes the customer based on the factors such as customers who have:

- provided all the kyc documentation that is required to review all the details that is associated with the customer/supplier along with the ownership details and nature of the business.
- These customers have had long-standing business relationships with the Promise Gold Refinery FZC. The ownership structure is not complex.
- These customers have a regulatory and supervisory framework in the countries that they are incorporated in.
- The Risk Rating of the Country which these customers and Suppliers are incorporated are considered a Low-Risk country by Know your country and FATF Risk Rating. These customers and suppliers are incorporated in countries that have no sanctions and are not in the FATF Grey List that require additional supervision.
- These companies are regulated and certified by independent organizations such as LBMA, RJC and UAE Good Delivery.
- These customers have product size is less than 10 Kg per shipment, and they have provided the source of funds and source of wealth to make the purchase or sale of the products, Transparency and transferability related to the ownership of products is well established.



- The companies have a very transparent Mode of Delivery and has secured third party Logistics partners (like Brink, G4S, Transguard), involved in the supply of the product.
- These companies have No cash transaction involved all the payments are made and received through bank transfers
- The payments are not made to any related party or third party, the payment is made into the customer/ supplier's own bank account.
- These customers have no Multi Level of ownership, and UBO are from Low Risk countries and are not a PEP or associated to a PEP.
- These customers have no Hit during the screening (Sanction, PEP and Adverse Media).
- These customers have well-established AML and CFT Policies and Sourcing Policy

### **APPROACH TO LOW RISK CUSTOMERS AND SUPPLIERS**

A Standard Due Diligence will be conducted on **Low-Risk Customers**, by the Compliance Assistant Manager, who will review and conduct basic screening of the Customer/ Supplier and shareholders who would be placed under Ongoing Screening. These customers can be approved by the compliance Assistant Manager, after conducting Standard Due Diligence. RE KYC review of the counterparty would be conducted over a period of **12-16 MONTHS**.

### **2. MEDIUM -RISK CUSTOMERS AND SUPPLIERS**

This classification categorizes the customer based on the factors such as customers who have the following factors.

- Customer who has provided all the KYC documentation that is required to review all the details that are associated with the customer/supplier along with the ownership details and nature of the business.
- These customers have had long-standing business relationships with the Promise Gold Refinery FZC. The ownership structure is not complex.
- These customers have a regulatory and supervisory framework in the countries in that they are incorporated.
- The Risk Rating of the Country in which these customers and Suppliers are incorporated are considered a Medium Risk country by Know your country and FATF Risk Rating.
- These customers and suppliers are incorporated in countries that have no sanctions and are not on the FATF Grey List which requires additional supervision.
- These companies are regulated and certified by independent organizations such as LBMA, RJC and UAE Good Delivery.
- These customers have a product size is less than 10-25 Kg per shipment, and they have provided the source of funds and source of wealth to make the purchase or sale of the products, Transparency and transferability related to the ownership of products are well established.
- The companies have a very transparent Mode of Delivery and have no third party involved in the supply of the product.
- These companies have Less than 10% cash transaction involved, and 90% of the payments are made and received through bank transfers
- The payment is not made to any related party or third party, the payment is made into the customer/supplier's own bank account.
- These customers have no Multi Level of ownership, and UBOs are from Medium-Risk countries.
- Local (United Arab Emirates) PEPs are classified into this Category.
- The Supplier who is sourcing metal from medium Risk Country where the AML and Corruption are at medium levels.



- These customers have no Hit during the screening (Sanction, PEP and Adverse Media).
- These customers have well-established AML and CFT Policies and Sourcing policies.

### **APPROACH TO MEDIUM RISK CUSTOMERS AND SUPPLIERS**

A Standard Due Diligence will be conducted on **Medium Risk Customers and Suppliers**, by the Compliance Assistant Manager, who will review and conduct basic screening of the Customer/ Supplier and shareholders who would be placed under Ongoing Screening. These customers can be approved by the compliance Assistant Manager, after conducting Standard Due Diligence. These customers will be reviewed on a **12 MONTHS bases**.

### **3. HIGH-RISK CUSTOMERS AND SUPPLIERS**

This classification categorizes the customer based on the factors such as customers who have the following characteristics:

- Customer who has provided the basic KYC documentation that is required to review all the details that are associated with the customer/supplier along with the ownership details and nature of the business.
- These customers do not have a long-standing business relationship with the Promise Gold Refinery FZC and who any customer who has been in the business for less than one Year.
- The ownership structure is complex and has multiple levels of ownership of the company.
- These customers have very less regulatory and supervisory frameworks in the countries in which they are incorporated and countries that they operate in.
- The Risk Rating of the Country in which these customers and Suppliers are incorporated are considered as High-Risk country by Know your country and FATF Risk Rating.
- These customers and suppliers are incorporated in countries that are on the FATF Grey List which requires additional supervision.
- These Suppliers are involved in sourcing metal from directly from the mines, hence they are exposed to the high probability of Bribery, Corruption and Environment Abuse hence they are categorized as High Risk.
- These companies have large-scale shipment.
- These companies are not regulated and certified by independent organizations.
- These companies actively use Hand Carry and Air Cargo for their delivery and use authorized third parties for the delivery of Metals.
- These companies have Less than 25% cash transactions involved, and 75% of the payments are made and received through bank transfers.
- The payment is not made to any related party or third party, the payment is made into the customer/supplier's own bank account.
- These customers have Multi Levels of ownership, and UBOs are from High -Risk countries or Sanctioned countries but are residents in Non-Sanctioned countries and have been living there for a period more than 3 years.
- International PEP from Low-Risk Countries and PEP's who have no Adverse Media against them are listed in this category.
- These customers have Potential Hits during the screening (Sanction, PEP and Adverse Media) but are found not to be a True Match.
- These customers have AML and CFT Policies and Sourcing policies.

### **APPROACH TO HIGH-RISK CUSTOMERS AND SUPPLIERS**

Compliance Manager would conduct an EDD review and conduct Enhanced screening on **High Risk Customer/ Supplier** and shareholders, once approved these customers would be placed under Ongoing Screening. For these customers' all their transactions will be subjected to screening, the compliance manager will conduct a Monthly review of their overall activity to ensure the Risks are Mitigated. RE KYC review of the counterparty would be conducted over a period of **Annual Basis**.



## 5. PROHIBITED CATEGORIES OF CUSTOMERS

Any customer or supplier would be categorized as **Prohibited** if they fall under the below category. Any company or Shareholder registered in any Sanctioned country, the UBO is Residents of Sanctioned Countries or Countries that are listed in Conflict-Affected and High-Risk Areas or Operating from these areas.

- Is a foreign pep from a High-Risk Country and PEP who have adverse media Information.
- Is a restricted or sanctioned person on an official authority watch list.
- Where payment is made in form of precious metal and stones or equivalent form.
- Where business relationships and transactions are involved from Sanctioned jurisdictions.
- Person/country; located in a Conflict-Affected high-risk country; or is connected to the extraction industry, for instance, the extraction of natural resources such as gas, oil, diamonds, gold (and other precious metal), and wildlife (e.g., ivory trading) from CAHRA
- Has a complex ownership structure, making it difficult to identify the owners and controllers or know where funds are coming from or going.
- Is a charity or a ‘not-for-profit organization (NPO) –terrorists may exploit charities to move funds, provide logistical support, encourage terrorist recruitment, or support other terrorist groups.
- Customers /Supplier and Shareholders who have been convicted for AML, Bribery, Smuggling, Human Rights Abuse, Human Trafficking etc.
- Customer so are not willing to provide KYC Documents to validate the Ownership of the firm.
- Customers who request payment to be made and received in form of cryptocurrency.
- Customers and suppliers who use shell banks and shell companies.
- Company or shareholder has been listed or associated with Terrorist List.
- Suppliers who do not have proof of Tax Payment to the government for their shipment.
- Customer / Suppliers who do not have Valid Trade License, Export License and Mining License.
- Customers who have their company incorporated in a Black Listed country (Iran and Democratic Republic of Korea).
- Customer and Supplier who are Multiple Third party involved in Supply Chain.
- Companies who insist on conducting only cash-based transaction.
- Companies and Shareholders who have been True Match Hit during screening for (PEP, Sanctions and Adverse Media info).

## THE COURSE OF ACTION

Compliance Manager would conduct review and **Review and Straight away Reject** these Customer and Suppliers at the time of on boarding. If its an existing customer, the staff will bring the concerns to the compliance manager who will conduct a review and would be reporting to the component authority via GO AML and conduct necessary actions as required by the regulator and exit the relationship with the customer at the earliest.



## **ONGOING SCREENING:**

All customer categories are subject to be ongoing screening for Sanction, PEP and Adverse media information. A periodically risk-based review is carried out to ensure that customer-related data or information is kept up to date. This required periodic screening of the customer's transaction for high risk. In case of any unusual transaction or suspicious transaction or activity please follow the instruction on reporting as prescribed in the Policy.

## **HIGH RISK CALL FOR ACTION AND GRAY LIST BY FATF**

Promise Gold Refinery FZC does not deal with the High-Risk Call for Action countries (Refer FATF High-Risk Countries). During the course of business relationship if any transaction is originating from, routed through or destined to high risk jurisdictions "Call for action" as well as any financial or non-financial engagement involving an individual or entity hailing from (by virtue of nationality, residency, place of incorporation) a country classified as a 'High-Risk Jurisdiction subject to a Call for Action' by FATF (list available via link on NAMLCFTC's website -High Risk Countries) should be mandatorily reported as per Reporting requirements. Compliance officer shall determine to report such a transaction to FIU in appropriate form.

The list of Jurisdictions under Increased Monitoring (the Gray List), shall be adopted along with the requirements to implement procedures by DNFBPs that may include enhanced due diligence measures. Promise Gold Refinery FZC shall continuously monitor the blacklist and grey list of FATF and take measure accordingly.

To refer to the Black and Grey list please visit the following National Committee website:

<https://www.namlcftc.gov.ae/ar/>.

In case of PEP, High Risk jurisdiction, all relationship should be signed by the Compliance officer and owner of the Promise Gold Refinery FZC.

## **SUSPICIOUS TRANSACTION REPORTING**

The AML/CFT Law defines 'suspicious transactions' as transactions related to funds for which there are reasonable grounds to believe that they are earned from any felony or misdemeanour or related to the financing of terrorism or of Illegal organizations, whether committed or attempted .

Promise Gold Refinery FZC shall establish and update the indicators to identify possible suspicious transactions and report the suspicious transactions to the FIU without any delay when the company has suspicions, or reasonable grounds to suspect, that the proceeds are linked to a crime, or to the attempt or intent to use funds or proceeds for committing, concealing, or profiting from a crime. Promise Gold Refinery FZC is not required to have knowledge of the underlying criminal activity nor any founded suspicion that the proceeds come from a criminal activity; reasonable grounds are sufficient. The suspicious nature of a transaction can be deduced from various information, such as indicators, behavioural patterns, or CDD information. Refer to Appendix 1 for non-exhaustive list of red flag indicators to help identify suspicious transactions or activity.

Appendix 1 also includes a set of risk indicators that may be directly or indirectly related to the abuse of DPMS and signal potential misuse of the PMS sector or the establishment of DPMS entities for the purpose of ML or TF . These indicators are particularly important in the context of the business-to-business (B2B) commerce transactions conducted by Promise Gold Refinery FZC.



## **INTERNAL REPORTING**

Employees in the first line of defence, such as relationship managers and back-office operations staff are crucial in identifying and preventing money laundering and the financing of terrorism and illegal organizations and must understand the ML/FT risks relevant to PMS sector. These employees play a key role in managing customer and third-party risks, as well as in promptly escalating potentially suspicious activities and should receive appropriate training on potential ML/TF risks, risk mitigation, and reporting. Employees should also understand the regulatory requirements related to their roles, the red flags associated with their customers, products, services, delivery channels, and geographic regions, as well as the proper escalation procedures to management and Compliance Team, without compromising their responsibility to report suspicious transactions. If any employee of Promise Gold Refinery FZC identifies unusual or potentially suspicious activity, regardless of the value, he/she shall escalate it promptly to the Compliance Officer via email for further analysis and decision whether to report the STR to the FIU or not.

## **INVESTIGATION OF ALERTS**

Employees of the Compliance Team shall review alerts (e.g. automated transaction monitoring alerts, employee referrals, and law enforcement requests) and assess whether further investigation is necessary, ensuring that the rationale for their decision is documented. If the information available at the alert review stage is sufficient to warrant a filing of STR without further investigation, the Compliance Team's employees shall promptly escalate the alerted activity to the Compliance Officer for review. The investigation of alerts, along with its conclusions, will be thoroughly documented, including the decision to either close the alert or promptly report the transaction as suspicious. For any alerted activity assessed to require further investigation, the Compliance Team will conduct the investigation, analyse all relevant information, document the findings and provide a recommendation on whether STR shall be filed. The turnaround time for Requests for Information (RFIs) is 3 working days. No unanswered or delayed RFIs during the course of the investigation shall not delay the timely submission of recommendations to the Compliance Officer regarding the filing of STR.

## **EXTERNAL REPORTING**

It is the responsibility of the Compliance Officer of Promise Gold Refinery FZC to "review, scrutinize and study records, receive data concerning Suspicious Transactions, and take decisions to either notify the FIU or maintain the Transaction with the reasons for maintaining while maintaining complete confidentiality" Upon receipt of data concerning suspicious transactions, the Compliance Officer shall review and analyse the data and determine whether to report a transaction as suspicious to the UAE FIU via goAML, or not. The Compliance Officer shall document the decisioning process and outcome and maintain the relevant records. Promise Gold Refinery FZC must report a transaction (pending, in progress, or past) to the FIU immediately once its suspicious nature becomes evident. This occurs when, based on an objective assessment of the available information, there is reason to believe that the transaction is suspicious. Promise Gold Refinery FZC must promptly investigate alerts and potential indications of ML/FT and immediately report the transaction upon concluding that it should be reported to the FIU. Promise Gold Refinery FZC must also be able to demonstrate that immediate and continuous action was taken from the moment the alert was raised. There is no minimum threshold or monetary value for reporting; all suspicious transactions, including attempted ones, must be reported regardless of the transaction amount. There is no statute of limitations regarding when the possible crimes or the suspicious transaction took place. Post the submission of the stated report, Promise Gold Refinery FZC will allow reasonable time period for receiving feedback from FIU with any advice or objection pertaining to the reported transaction(s), before executing such transaction(s). In the absence of any response from the UAE FIU, taking into consideration the type, size and circumstances of the transaction; normal average processing times for the specific transaction type; type of customer or business relationship; nature and size of the business; and precise nature of the suspicion, the Compliance Officer shall reserve the discretion to approve or deny the case. All business rejection cases by Compliance should be backed by the Promise Gold Refinery FZC owner.



Promise Gold Refinery FZC shall ensure that its Compliance Officer is registered at GoAML portal for the purpose of reporting the suspicious transactions to the UAE FIU. Refer to Appendix 2 for more information about GoAML portal.

### **Handling of Transactions and Business Relationships after the Filing of STRs**

Once a Suspicious Transaction or other suspicious information related to a customer or business relationship has been reported to the UAE FIU, Promise Gold Refinery FZC shall apply the following measures:

- immediately classify the customer or business relationship as 'high risk',
- conduct enhanced due diligence (EDD) and ongoing monitoring to mitigate the associated ML/FT risks,
- comply with any instructions from the FIU regarding both the specific transaction and the business relationship as a whole.

When an STR involves a transaction that is anticipated, pending, or already in progress, Promise Gold Refinery FZC will make every effort to delay the execution or completion of the transaction, allowing reasonable period of time to receive feedback, instructions, or additional information requests from the FIU. In doing so, Promise Gold Refinery FZC will avoid "tipping off" the customer or raising suspicion that the transaction is under investigation or has been reported. Promise Gold Refinery FZC will take the following measures, either individual or combined, to delay the transaction:

- Delaying the transaction processing without providing an explanation for as long as possible,
- Informing the customer that the transaction has been delayed due to an unspecified operational, technical, or other issue, and that efforts are being made to resolve it,
- Requesting additional information and/or supporting documentation related to the transaction, customer, or counterparty, such as evidence of relevant licenses or authorizations, shipping or customs/bank or additional identification documents, etc.
- Informing the customer that paperwork for the transaction has been lost and asking for it to be resubmitted,
- Notifying the customer that the transaction is awaiting internal approval,
- Employing any other reasonable delaying strategies, while ensuring compliance with the obligation to avoid "tipping off" the customer.

If any new suspicion arises during a period when anticipated, pending, or in-progress STR that has already been reported to the FIU is being delayed, Promise Gold Refinery FZC shall promptly report to the FIU as a follow-up to the original STR. Examples of such additional suspicions include, but are not limited to:

- New adverse information related to the transaction, the business relationship, or the counterparty.
- Unusual behaviour exhibited by the customer due to the delay in the transaction, such as sudden cancellation of the transaction or termination of the business relationship, threats directed at coercing Promise Gold Refinery FZC or its employees into completing the transaction, etc.

If a sufficient period has not yet passed before receiving feedback, instructions, or requests for additional information from the FIU concerning an STR, and it becomes impossible for the DNFBP to further delay the execution of the reported transaction without raising the customer's suspicion that it is being investigated or reported, Promise Gold Refinery FZC shall seek specific instructions or permission from the FIU regarding the execution or rejection of the transaction.

Promise Gold Refinery FZC may not receive instructions or other feedback from the FIU regarding filed STRs, or there may be a delay in receiving such communication that exceeds reasonable timeframe deemed by Promise Gold Refinery FZC. In these situations, Promise Gold Refinery FZC shall assess how to appropriately handle the STR and the business relationship overall, considering all relevant risk factors.

- reassessing the risk associated with the business relationship and re-evaluating the customer's risk profile,
- initiating an enhanced customer due diligence review,
- considering conducting an enhanced background investigation (including, if appropriate, utilizing a third-party investigation service), and



- taking any other reasonable measures commensurate with the nature and size of their businesses while ensuring compliance with the obligation to avoid "tipping off" the customer.

Promise Gold Refinery FZC is not required to terminate the business relationship after filing an STR, however when deciding to terminate a business relationship for which an STR has been filed and no feedback has been received from the FIU after a reasonable period, Promise Gold Refinery FZC shall formally notify the FIU of the company's intention to proceed with the termination unless there is an official objection.

### **Confidentiality and Prohibition against “Tipping Off”**

Tipping off is a punishable offence and is not permitted.

When reporting suspicious transactions to the FIU, Promise Gold Refinery FZC must keep both the reported information and the fact of reporting confidential. The company should also take reasonable steps to protect the relevant information and data from unauthorized access.

It is a federal offense for DNFBPs, including their managers, employees, or representatives, to notify a customer or any other individual, directly or indirectly, that a report has been or will be filed, or to disclose the information contained in the report, or that an investigation is in progress regarding the transaction. Anyone who violates this prohibition is subject to a penalty ranging from no less than AED 100,000 to no more than AED 500,000 and imprisonment for term of not less than six months.

### **Consequences for Failure to Disclose Suspicious Activity**

Failure to report a suspicious transaction (STR, SAR, or other report types) without delay, whether intentionally or due to gross negligence, constitutes a federal crime in the UAE. The AML-CFT Law stipulates the following penalties for any individual, including DNFBPs, as well as their managers and employees, who fail to fulfil their statutory obligation to report a suspicion of money laundering, related predicate offenses, or the financing of terrorism or illegal organizations, whether deliberately or through gross negligence:

- Imprisonment and fine of no less than AED 100,000 and no more than AED 1,000,000, or
- Any of these two sanctions, according to Article 24 of the AML-CFT Law.

According to Article 15 of the AML-CFT Law, the requirement to report is upon suspicion or if there are reasonable grounds to suspect a crime.

### **Protection for Individuals Disclosing Suspicious Activity**

Promise Gold Refinery FZC along with their board members, employees, and authorized representatives, are protected by Article 15 of the AML-CFT Law and Article 17.3 of the AML-CFT Decision from any administrative, civil, or criminal liability arising from their good-faith efforts to fulfil their statutory obligation to report suspicious activity to the FIU. This protection applies even if they were unaware of the specific underlying criminal activity or if no illegal activity ultimately occurred. This includes situations where an employee files an STR, SAR, or other report types against their employer's wishes. However, it should be noted that this protection does not apply to the unlawful disclosure to the customer or any other person, whether directly or indirectly, that a suspicious transaction report has been or will be filed, or to the sharing of the information or data contained in the report, or the fact that an investigation is being conducted related to the transaction.



### **Dealers in Precious Metals and Stones Report (DPMSR)**

- **Transactions with resident individuals:** Promise Gold Refinery FZC shall obtain identification documents (Emirates ID or Passport) for cash transactions equal to or exceeding AED 55,000 and register the information in the FIU GoAML platform using DPMSR.
- **Transactions with non-resident individuals:** Promise Gold Refinery FZC shall obtain identification documents (ID or Passport) for cash transactions equal to or exceeding AED 55,000 and register the information in the FIU GoAML platform using DPMSR.
- **Transactions with entities / companies:** Promise Gold Refinery FZC will collect a copy of the trade license, and identification documents (Emirates ID or passport) of the person representing the company, in transactions equal to or exceeding AED 55,000 in cash or through wire transfer and register the information in the FIU GoAML using the DPMSR.

### **Politically Exposed Person (PEP) Screening**

PEP refers to Politically exposed person. Natural persons who are or have been entrusted with prominent public function in the state or any their foreign country such as Head of the Government, Senior Politicians, State Government officials, judicial or military officials, senior executive managers or state owned corporations, and senior officials of political parties and person who are, or have been entrusted with the management of an international Organization or any prominent function within such an Organization including Direct Family members of PEP or Associates known to be close to Associates.

Enhance Due Diligence measures should be applied in case of business relationship, Counterparty or PEP has been identified as PEP Promise Gold Refinery FZC Owner's/ Compliance Managers approval is must prior to proceeding based on risk assessment on all PEP cases. In doing so Promise Gold Refinery FZC should be:

- Implementing (automated) screening systems which screen customer and transaction information for matches with known PEPs;
- Incorporating thorough background searches into their CDD procedures, using tools such as:
- Manual internet search protocols;
- Public or private databases;
- Publicly accessible or subscription information aggregation services;
- Commercially available background investigation services.

In case of PEP, High Risk jurisdiction, all relationship should be signed by the Compliance officer and owner of the Promise Gold Refinery FZC.

### **TARGETED FINANCIAL SANCTIONS (TFS)**

The term "targeted sanctions" refers to sanctions imposed on specific individuals, entities, or groups. Targeted Financial Sanctions (TFS) encompass both the immediate freezing of assets and the prohibition of providing funds, assets, or services, either directly or indirectly, to the benefit of sanctioned individuals, entities, or groups.

The UAE issued Cabinet Decision No. 74 of 2020, which established the framework for TFS. This includes the Local Terrorist List, the UN Consolidated List (collectively referred to as the Sanctions Lists), and the procedures for implementing TFS. The Sanction Lists contain the names of individuals, entities, or groups primarily engaged in activities such as terrorism, terrorism financing, proliferation financing, and violations of international law, and who are deemed by the UAE or the UN to be detrimental to national or global peace and security.

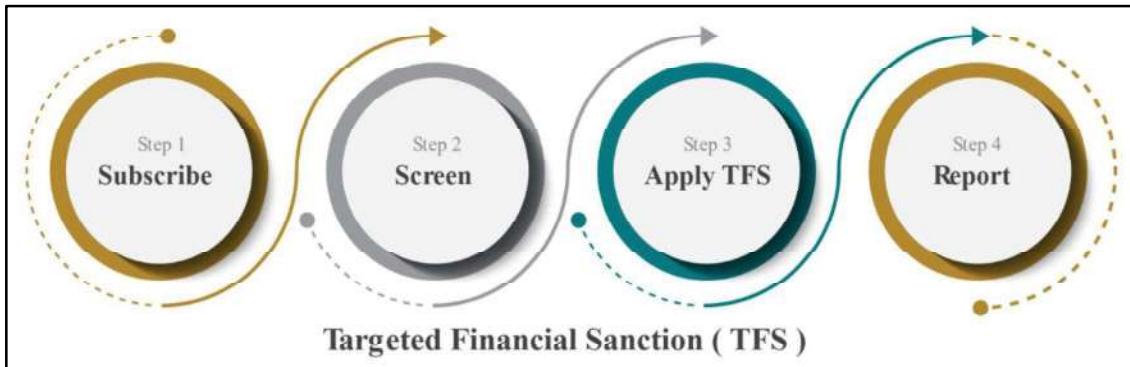
The Sanctions Lists provide a range of information to assist in identifying designated individuals, entities, or groups. Where the individual, entity, or group matches all of the key identifiers published on the Sanctions Lists ('confirmed match'), Promise Gold Refinery FZC must immediately (within 24 hours) freeze assets, refrain from providing any funds, assets, or services, and report the freezing measures to the EOCN and the Ministry of Economy via GoAML within five business days of applying any freezing measures and/or attempted transactions. If the confirmed match is a potential customer, the transaction must be immediately rejected by Promise Gold Refinery FZC , and the case reported.



Failure to implement freezing measures immediately, at the latest within 24 hours of a designation, or provide funds or services to or for the benefit of a designated individual or entity, constitutes a violation of the UAE law. This may lead to both financial penalties and imprisonment, as set out in the Cabinet Decision.

### TFS Obligations

In implementing the TFS, Promise Gold Refinery FZC must comply with the following obligations:



#### **Step-1 Subscribe:**

Subscribe to the Notification System of the Executive Office for Control and Non-Proliferation (EOCN) to receive automated email notifications on any updates to the Sanctions Lists (Local Terrorist List or UN Consolidated List): UN page Executive Office for Control & Non-Proliferation ([uaeiec.gov.ae](http://uaeiec.gov.ae))

#### **Step-2 Screen:**

Conduct regular and ongoing screening on the latest Local Terrorist List and UN Consolidated List, available on EOCN web-site (see link above).

#### **Screening must be undertaken in the following circumstances:**

1. Upon any updates to the Local Terrorist List or UN Consolidated List. In such cases, screening must be conducted immediately and without delay to ensure compliance with implementing freezing measures without delay (within 24 hours).
2. Prior to onboarding new customers/business relationships.
3. Upon KYC reviews or changes to a customer's information.
4. Before processing any transaction.

#### **Step-3 Apply TFS:**

1. **Freezing of all funds:** Freeze, without delay (within 24 hours) and **without prior notice**, all the funds:
  - Owned or controlled, wholly or jointly, directly, or indirectly, by an individual or legal entity designated by the UAE Cabinet or pursuant to a relevant UNSC Resolution.
  - Derived or generated from funds under the item above; or
  - Individuals or legal entities acting on behalf of or at the direction of an individual or legal entity designated by an individual or legal entity designated by the Local Terrorist List or the UN Consolidated List pursuant to a relevant UNSC Resolution.
2. **Prohibition of making funds available:** No individual or legal person in the UAE, including Promise Gold Refinery FZC is permitted to provide services (e.g. supply of precious metal or stones or equivalent) related to, whether in whole or in part, directly or indirectly, or for the benefit of any individual or legal entity listed in the Local Terrorist List or the UN Consolidated List pursuant to a relevant UNSC Resolution.
3. **Duration of Freezing Measures:** The freezing of assets and prohibition measures have no time limit. The funds must remain frozen, and the prohibition to provide funds and services continues until the individual, group, or entity is removed from the Local Terrorist List or the UN Consolidated List or until there is a decision to lift the freezing measures by a competent authority or the UN Sanctions Committee.



#### 4. TFS - TF Red Flags

A list of red flags to identify TF potential sanctions circumventions is embedded in Appendix 4.

##### Step-4 Report:

Report any freezing or suspension measures taken upon identifying confirmed or potential matches through the GoAML platform within five (5) days from taking such measures.

- If a confirmed match is identified, Promise Gold Refinery FZC must immediately (within 24 hours) freeze the assets and submit a Funds Freeze Report (FFR) through GoAML. The FFR shall include details about the type and amount of frozen funds or other assets, identification documents of the confirmed match, and any additional supporting documentation.
- If a partial name match is identified, Promise Gold Refinery FZC must immediately suspend the transaction and submit a Partial Name Match Report (PNMR) through GoAML. The PNMR shall include details about the type and amount of funds or other assets suspended, identification documents of the partial name match, and any other relevant supporting documents.
- The overview of the TFS Measures along with reporting process is provided below:

		TFS Measures	Reporting Process
Confirmed Match	Existing Customer	Freeze Assets without delay Prohibit making Funds / Services available	<b>Submit FFR</b> Via goAML within 5 days
	Potential Customer	Reject customer	<b>Submit FFR</b> Via goAML within 5 days
Partial Name Match	Any Customer	Suspend all Transaction without delay Prohibit making Funds / Services available	<b>Submit PNMR</b> Via goAML within 5 days
NO Match	Any Customer	No further action is required	<b>No Report Required</b>

The employees of Promise Gold Refinery FZC are prohibited from, directly or indirectly, informing the customer or any third party that freezing action or any other measures are going to be implemented. Refer to Appendix 3 for additional obligations on TFS.

This policy shall be read in conjunction with the Sanctions Screening procedures.

##### Reliance on Third Party for Screening Solution

Promise Gold Refinery FZC may use externally provided sanctions screening services to fulfil company's legal and regulatory obligations to screen its customers and transactions. However, Promise Gold Refinery FZC should be ultimately responsible for complying with AML/CFT and sanctions requirements, even while using third-party model to assist with meeting its compliance obligations. The screening system should be appropriate to the nature, size and risk of Promise Gold Refinery FZC business.

Where reliance is placed on vendor's system, Promise Gold Refinery FZC should understand the mechanism behind the thresholds and tuning and conduct quality control checks on a regular basis.



### Proliferation Financing Risk

Promise Gold Refinery FZC should assess and mitigate proliferation financing risk as defined more narrowly in the FATF's Recommendation 1:

Proliferation Financing (PF) risk refers to the potential breach, non-implementation, or evasion of the targeted financial sanctions obligations referred to in FATF Recommendation 7, namely those pursuant to UNSCRs relating to the prevention, suppression, and disruption of proliferation of weapons of mass destruction (WMD) and its financing.

Three stages of PF include: program fundraising, disguising the funds and procurement of materials and technology.

- **Program Fundraising:** A proliferating country generates financial resources to cover domestic expenses. These funds may come from the country's national budget, profits from an international commercial network, or revenues from an overseas criminal enterprise. Example: export of prohibited commodities, e.g. coal, iron and copper by North Korea (DPRK) to generate revenue as part of intricate trade-based payment schemes to support its WMD and conventional weapons program development.
- **Disguising the Funds:** The proliferating state injects assets into the international financial system, often involving foreign exchange transactions, for trade purposes. This process can range from simple methods, such as using standard correspondent banking channels, to more complex approaches involving networks of procurement agents and front companies. Countries facing comprehensive sanctions often attempt to bypass these restrictions by employing sophisticated techniques to obscure the origin of funds. Both Iran and North Korea (DPRK) have been known to use front companies, shell companies, and complex, opaque ownership structures to evade and circumvent targeted financial sanctions (TFS).
- **Procurement of Materials and Technology:** The proliferating state or its agents use concealed financial resources to acquire materials and technology through the international financial system. This stage also involves making payments for the shipping and transport of these goods, e.g. employment of various procurement strategies by Iran, including the use of front companies for prohibited procurement and leveraging country's petrochemical sector to obscure the intended use of items acquired for its nuclear program.

### UAE Control List

Cabinet Resolution No. 50 of 2020 contains the list of strategic and Dual-Use goods controlled under UAE law (UAE Control List). The UAE Control List implements internationally agreed Dual-Use goods subject to import and export control, including the Missile Technology Control Regime (MTCR), Nuclear Suppliers Group (NSG), the Wassenaar Arrangement (WA), the Australia Group (AG), the Chemical Weapons Convention (CWC), and the Organization for the Prohibition of Chemical Weapons (OPCW).

The UAE Control List is organized into 12 categories based on the type of technology involved. Each category provides a technical description of the items and specifies their control parameters. An overview of these categories is provided below



Category	Type / mandate	Example of controlled items used in WMD programs
0	Nuclear Materials	Nuclear Reactor - Pressure Tubes - Zirconium Metal Tubes - Steam generators
1	Special Materials	Protective and detection equipment - Body armour and components - High-density lead glass
2	Material Processing	Bearing systems - Milling Machines - Robotics - Vibration test systems - Motion simulators
3	Electronics	Microcomputers - Microcircuits - Microwave Amplifiers - Oscillator - High-speed pulse generators
4	Computers	Electronic Computers - Hybrid Computers - Analogue Computers
5	Telecommunications	Telecommunication systems - Electronically steerable antennae - Interception & Jamming equipment
6	Sensors	Acoustic systems - Optical sensors - Scanning cameras - Imaging cameras - Optical equipment
7	Navigations & Avionics	Accelerometers - Gyros - Inertial measurement equipment - Global Navigation Satellite Systems
8	Marine	Submersible Vehicles and surface vessels - Pumpjet propulsion - Noise reduction systems
9	Aerospace & Propulsion	Gas Turbine Engines - Marine gas turbine engines - Liquid rocket propulsion - Ramjet - Scramjet
10	Chemical List (OPCW)	Chemical Weapons Chemical Lists
11	National Controlled Commodities	Armoured components and technologies

Additionally, the EOCN website provides a list of dual-use chemicals that fall under the UAE Control List: UAE Control List | Executive Office for Control & Non-Proliferation ([uaeiec.gov.ae](http://uaeiec.gov.ae)).

#### **Enhanced Due Diligence for Customers and Transactions**

Promise Gold Refinery FZC should conduct enhanced due diligence (EDD) on all customers and transactions that are assessed as high-risk for PF for the purpose of mitigating the PF risk of a designated person concealing their identity or ownership of an entity. Another objective of customer EDD is to gather information about the customer's expected behaviour, and to identify the expected end users of any strategic goods or Dual-Use goods and the customer's expected exposure to high-risk jurisdictions, including trans-shipment hubs.

#### **Customer EDD measures should include, at minimum, the following:**

- Obtaining additional information about the customer and the intended nature of the business relationship and updating more frequently the identification data of the customer and beneficial owner.
- Obtaining additional information about the customer's source of funds and wealth.
- Requiring customers to provide a list of main suppliers and customers and conducting basic due diligence and public records searches on these entities.
- Reviewing the customer's customer acceptance policy, TFS policy, and any policies related to export controls, and requiring the customer to introduce changes if these policies are not sufficient.
- Obtaining senior management's approval to start or continue the business relationship.
- Conducting enhanced monitoring of the business relationship by increasing the timing and number of controls applied.

EDD should also be applied to transactions identified to involve any proliferation sensitive goods or services, irrespective of the customer being assessed as high-risk for PF or not.

#### **Shell and Front Companies**

While shell companies often fulfil legitimate economic functions, both shell and front companies have been misused by designated individuals and entities to conceal their involvement in transactions and evade TFS. Complex networks of such companies can make it challenging for both the private sector and authorities to trace the flow of illicit funds globally. Hence, for the purpose of mitigating this PF risk, Promise Gold Refinery FZC should conduct thorough customer due diligence, and EDD where necessary, to comprehensively identify their customers and their beneficial owners. Promise Gold Refinery FZC should also be vigilant for shell companies, especially those from high-risk jurisdictions, in transactions, when relevant.



## PF Red Flags

A list of red flags for possible PF activities is embedded in [Appendix 5](#).

### Update of KYC information

KYC information should be reviewed periodically, based on the risk categorization of the customer and supplier, with the Lowest Updating period being annually and Highest Risk Being Done every quarterly.

### Use of Third party for CDD

Promise Gold Refinery FZC may use the third party in reliance on a third party of the entire or part of the CDD process as well as reliance on a third party when introducing business. In selecting a third party, Promise Gold Refinery FZC should ensure that:

- The third party is regulated and supervised and adheres to the CDD measures towards Customers and record-keeping.
- The third party should also have adequate and effective control measure on Anti-Money Laundering, Counter financing of Terrorism and Illegal organization and sanction measures.
- SLA is agreed with the third parties setting role and responsibilities of each party.
- Procedures for the certification by third parties of documents and other records pertaining to the CDD measures undertaken.
- Copies of the Identification and verification checks are made available as and when required.
- They reserve right to audit third party and their business relationship, customer and counterparty data, due diligence documentations.

## TRAINING AND AWARENESS

Promise Gold Refinery FZC believes that one of the best tools to combat money laundering and terrorism financing is to create a culture of compliance and control among its staff. Training Program ensures that all the staff are mandatorily trained in AML and sanctions-related requirements at the time of joining and regularly on an on-going basis.

Staff will have access to the updated version of this policy and other policies and will be involved in the task of prevention, for which they will be duly informed and instructed. To ensure the continued adherence to AML/, CFT and Sanction policy, all staff of Promise Gold Refinery FZC are required to confirm and reconfirm their awareness of the contents of this Compliance Manual by signing the acknowledgement form annually, or more frequently, as required by the Compliance Officer.

All the staff will be provided with regular training periodically, it is mandatory that the staff be trained at least twice a Year.

## RECORD RETENTION

Promise Gold Refinery FZC shall keep comprehensive records, documents, data, and statistics for all transactions, including those obtained through CDD measures, account files, business correspondence, and the results of any analysis conducted. Promise Gold Refinery FZC shall also maintain records and documents related to the ML/FT risk assessments and mitigation measures as well as records of AML/CFT training registers, training attendance sheets, AML training materials and other evidence for providing AML/CFT and TFS training. A clear audit trail for any potential matches shall be maintained by Promise Gold Refinery FZC along with documentation of the underlying TF/PF risks as well as supporting documents for the transaction monitoring and investigations carried out on unusual transactions. The records shall be stored electronically and organized in a manner that allows for data analysis and the tracking of financial transactions and shall be made immediately available to the Competent Authorities upon request. The records shall be detailed enough to allow the reconstruction of individual transaction, providing evidence for potential prosecution of criminal activities.



### **Promise Gold Refinery FZC shall ensure adequate backup of data.**

Promise Gold Refinery FZC must comply with the statutory retention period for all records which is a minimum of five (5) years, depending on the circumstances, starting from the date of the most recent of the following:

- termination of the business relationship or closure of the customer's account with Promise Gold Refinery FZC International,
- completion of an occasional transaction in the case of a customer with whom no business relationship exists,
- completion of an inspection of the records by Supervisory Authorities,
- issuance of a final judgment by the competent judicial authorities,
- liquidation, dissolution, or any other form of termination of a legal entity or arrangement.

### **Records Type**

Transaction records include operational and statistical records, documents, and information related to all (commercial or financial) transactions carried out or processed by Promise Gold Refinery FZC International, whether domestic or international. Examples include:

- customer correspondence, requests, or order forms related to the initiation and execution of all types of transactions and associated agreements.
- customer payment advice, receipts, invoices, billing notifications, bills of exchange, account statements, and expense reimbursement requests or notifications.
- agreements related to sales, purchases, leases, mergers and acquisitions, and similar agreements
- statistical and analytical data on customers' financial transactions, including details such as monetary values, volumes, currencies, interest rates, and other relevant information.
- In addition, Promise Gold Refinery FZC shall document any particularly large or unusual transactions and maintain this documentation as part of their records.

**CDD records** encompass records, documents, and information regarding customers, their due diligence, and the investigation and analysis of their activities, such as customer information, including account files, business correspondence, and the results of any analysis performed, company information, reliance on third parties for conducting CDD, ongoing monitoring of business relationships and Suspicious Transaction Reports (STRs):

- customer account information and files,
- customer correspondence (including email and fax communications), call reports, or meeting minutes (as well as any applicable recordings, transcripts, or logs of telephone or videophone calls),
- copies of personal identification documents, CDD (including enhanced and simplified due diligence forms), profiles, supporting documentation, and the results of background checks, queries, and investigations conducted during due diligence,
- records of customer risk assessments and classification records.

### **Record related to the ongoing monitoring of business relationships, such as:**

- files related to the review, analysis, and investigation of transactions, along with corresponding communications,
- customer correspondence (including emails and faxes), call reports, or meeting minutes (as well as any relevant recordings, transcripts, or logs of telephone or videophone calls) related to the transactions or their analysis and investigation,
- CDD records, documents, profiles, or information gathered during the review, analysis, or investigation of transactions, including transaction-related supporting documents and the results of background checks on customers, beneficial owners, beneficiaries, controlling persons, or counterparties to the transaction,
- records of transaction handling decisions, such as approvals or rejections, along with associated analysis and correspondence.



**Records and documents related to STRs and the results of the analysis or investigations conducted, such as:**

- suspicious transaction indicator alert records, logs, investigations, recommendations, decision records, and all related correspondence,
- requests for information from Competent Authorities, requests for assistance from Promise Gold Refinery FZC International, along with associated investigation files and correspondence,
- CDD and business relationship monitoring records, documents, and information obtained during the analysis or investigation of potentially suspicious transactions, including all related internal and external correspondence or communications,
- STRs (both internal and external), logs, and statistics, along with their related analysis, recommendations, decision records, and associated correspondence,
- records on feedback received from the FIU regarding reported STRs, along with records of any further actions taken or required by the FIU.

**Company Information:** administrators, liquidators, or any other stakeholders involved in the dissolution of the company shall retain the specified records, documents, and information for at least five (5) years from the date of the company's dissolution, liquidation, or termination. These records include corporate documents as well as information on beneficial owners, legal shareholders, and senior managers

**Reliance on Third Parties to Undertake CDD:** should Promise Gold Refinery FZC rely on third parties, whether unaffiliated or members of their own financial groups, the company must ensure that copies of all the necessary documents collected through the performance of CDD measures can be obtained upon request and without delay, and that the third parties adhere to the record-keeping provisions of the AML-CFT Decision.

**DPMSR related record:** Promise Gold Refinery FZC shall keep records of all documents and information related to the transactions subject to Dealers in Precious Metals and Stones Report (DPMSR) for a minimum period of 5 years.

**NON-COMPLIANCE**

- Any breach of this policy will be referred to the Compliance Officer who will review the breach and determine adequate consequences, which can include disciplinary procedures under HR procedures.
- Any violation or breach be subject to disciplinary proceedings in accordance with UAE Labour Law, the AML Regulations, and any other applicable UAE Laws.
- If employees are unsure or not clear of anything in this policy, they should seek clarification or advice from Compliance Officer.

**REVIEW**

The AML, CFT & Sanction policy shall be periodically reviewed and at least annually for accuracy and appropriateness.



## APPENDIX 1

### RED FLAGS/POTENTIAL SUSPICIOUS ACTIVITY LIST

#### The Business Relationship, Counterparty, or Customer:

- Suddenly cancels the transaction when asked for identification or information.
- Is reluctant or refuses to provide personal information, or the Promise Gold Refinery FZC has reasonable doubt that the provided information is correct or sufficient.

Is reluctant, unable, or refuses to explain:

- Their business activities and corporate history;
- The identity of the beneficial owner;
- Their source of wealth/funds;
- Why they are conducting their activities in a certain manner;
- Who they are transacting with;
- The nature of their business dealings with third parties (particularly third parties located in foreign jurisdictions).
- Is under investigation, has known connections with criminals, has a history of criminal indictments or convictions, or is the subject of adverse information (such as allegations of corruption or criminal activity) in reliable publicly available information sources.
- Is a designated person or organization (i.e. is on a Sanctions List).
- Is related to, or a known associate of, a person listed as being involved or suspected of involvement with terrorists or terrorist financing operations.
- Insists on the use of an intermediary (either professional or informal) in all interactions, without sufficient justification.
- Actively avoids personal contact without sufficient justification.
- Is a politically exposed person, or has familial or professional associations with a person who is politically exposed.
- Is a foreign national with no significant dealings in the country, and no clear economic or other rationale for doing business with Promise Gold Refinery FZC .
- Is located in a significant geographic distance away from the Promise Gold Refinery FZC , with no logical rationale.
- Refuses to co-operate or provide information, data, and documents usually required to facilitate a transaction, or is unfamiliar with the details of the requested transaction.
- Makes unusual requests (including those related to secrecy).
- Is prepared to pay substantially higher fees than usual, without legitimate reason.
- Appears very concerned about, or asks an unusual number of detailed questions about compliance-related matters, such as customer due-diligence or transaction reporting requirements.
- Is conducting a transaction which appears incompatible with their socio-economic, educational, or professional profile, or about which they appear not to have a good understanding.
- Uses legal persons, legal arrangements, or foreign private foundations that operate in jurisdictions with secrecy laws.
- Requests services that could improperly disguise the nature of the precious Metal and Stones or conceal beneficial ownership from competent authorities, without any clear legitimate purpose.
- Claims to be a legitimate DPMS but cannot demonstrate a history or provide evidence of real activity.
- Is a business that cannot be found on the internet or social business network platforms (such as LinkedIn or others).
- Is registered under a name that does not indicate that activity of the company is related to precious Metal and stones, or that indicates activities different from those it claims to perform.
- Is a business that uses an email address with a public or non-professional domain (such as Hotmail, Gmail, Yahoo, etc.).



- Is registered at an address that does not match the profile of the company, or that cannot be located on internet mapping services (such as Google Maps).
- Is registered at an address that is also listed against numerous other companies or legal arrangements, indicating the use of a mailbox service.
- Has directors or controlling shareholder(s) who cannot be located or contacted, or who do not appear to have an active role in the company, or where there is no evidence that they have authorized the transaction.
- Is incorporated or established in a jurisdiction that is considered to pose a high money laundering, terrorism financing, or corruption risk.
- Has a complex corporate structure that does not appear to be necessary or that does not make commercial sense.
- Appears to be acting according to instructions of the unknown or inappropriate person(s).
- Conducts an unusual number or frequency of transactions in a relatively short time period.
- Asks for shortcuts, excessively quick transactions, or complicated structures even when it poses an unnecessary business risk or expense.
- Requests payment arrangements that appear to be unusually or unnecessarily complex or confusing (for example, unusual deposit or instalment arrangements, or payment in several different forms), or which involve third parties.
- Provides identification, records or documentation which appear to be falsified or forged.
- Requires that transactions be affected exclusively or mainly through the use of cash, cash equivalents (such as cashier's cheques, gold certificates, bearer bonds, negotiable third-party promissory notes, or other such payment methods), or through virtual currencies, for the purpose of preserving their anonymity, without adequate and reasonable explanation.

#### **The Transaction-Based Red Flags:**

- Involves the use of a large sum of cash, without an adequate explanation as to its source or purpose.
- Involves the frequent trading of precious Metal and stones (especially diamonds and gold) or Jewellery for cash in small incremental amounts.
- Involves the barter or exchange of precious Metal and stone (especially diamonds and gold) or Jewellery for other high-end Jewellery.
- Appears structured so as to avoid the cash reporting threshold.
- Involves delivery instructions that appear to be unnecessarily complex or confusing, or which involve foreign jurisdictions with no apparent legitimate connection to the counterparty or customer.
- Includes contractual agreements with terms that are unusual or that do not make business sense for the parties involved.
- Involves payments to/from third parties that do not appear to have a logical connection to the transaction.
- Involves merchandise purchased with cash, which the customer then requests the merchant to sell for him/her on consignment.
- Involves precious Metal and stones with characteristics that are unusual or do not conform to market standards.
- Involves the unexplained use of powers-of-attorney or similar arrangements to transact business on behalf of a third party.
- Appears to be directed by someone (other than a formal legal representative) who is not a formal party to the transaction.
- Involves a person acting in the capacity of a director, signatory, or other authorized representative, who does not appear to have the required competency or suitability.
- Involves persons residing in tax havens or High-Risk Countries, when the characteristics of the transactions match any of those included in the list of indicators.
- Is carried out on behalf of minors, incapacitated persons or other categories of persons who appear to lack the mental or economic capacity to make such decisions.



- Involves several successive transactions which appear to be linked, or which involve the same parties or those persons who may have links to one another (for example, family ties, business ties, persons of the same nationality, persons sharing an address or having the same representatives or attorneys, etc.).
- Involves recently created legal persons or arrangements, when the amount is large compared to the assets of those legal entities.
- Involves foundations, cultural or leisure associations, or non-profit-making entities in general, especially when the nature of the merchandise or the characteristics of the transaction do not match the goals of the entity.
- Involves legal persons which, although incorporated in the country, are mainly owned by foreign nationals, who may or may not be resident for tax purposes.
- Involves unexplained last-minute changes involving the identity of the parties (e.g. it is begun in one individual's name and completed in another's without a logical explanation for the name change) and/or the details of the transaction.
- Involves a price that appears excessively high or low in relation to the value (book or market) of the goods, without a logical explanation.
- Involves circumstances in which the parties:
  - Do not show particular interest in the details of the transaction.
  - Do not seem particularly interested in obtaining a better price for the transaction or in improving the payment terms.
  - Insist on an unusually quick completion, without a reasonable explanation.
  - Takes place through intermediaries who are foreign nationals or individuals who are non-resident for tax purposes.
  - Involves unusually high levels of assets or unusually large transactions compared to what might reasonably be expected of clients with a similar profile.
  - Involves indications that the counterparty does not have or does not wish to obtain necessary governmental approvals, filings, licenses, or other official requirements.
  - Involves any attempt by a physical person or the controlling persons of a legal entity or legal arrangement to engage in a fraudulent transaction (including but not limited to: over- or under-invoicing of goods or services, multiple invoicing of the same goods or services, fraudulent invoicing for non-existent goods or services; over- or under- shipments (e.g. false entries on bills of lading); or multiple trading of the same goods and services).

### **Means of Payment**

- Involves cash, cash equivalents (such as cashier's cheques, gold certificates, bearer bonds, negotiable third-party promissory notes, or similar instruments), negotiable bearer instruments, or virtual currencies, which do not state the true payer, especially where the amount of such instruments is significant in relation to the total value of the transaction, or where the payment instrument is used in a non-standard manner.
- Involves unusual deposits (e.g. use of cash or negotiable instruments, such as travelers' cheques, cashier's cheques and money orders) in round denominations (to keep below the reporting threshold limit) to pay for precious Metals and stones. The negotiable instruments may be sequentially numbered or purchased at multiple locations, and may frequently lack payee information.
- Is divided into smaller parts or instalments with short intervals between them.
- Involves doubts as to the validity of the documents submitted in connection with the transaction.
- Involves third-party payments with no apparent connection or legitimate explanation.
- Cannot be reasonably identified with a legitimate source of funds.



### **Customer Behavior:**

- Established customer (including bullion dealers) dramatically increasing their purchase of gold bullion for no apparent reason.
- Foreign nationals purchasing gold bullion through multiple transactions over a short time period.
- Bullion transferred among associates using bullion accounts (including family members) for no apparent commercial purpose.
- Occupation inconsistent with customer's financial profile. For example, the customer may list their occupation as 'student' or 'truck driver' yet transfer large values of funds to bullion accounts.
- Customer buying gold bullion and using a General Post Office or private service mailbox as their address, without listing a corresponding box number.
- Unusual pattern and nature of bullion transactions inconsistent with the customer profile.
  - A previously unknown customer requesting a refiner to turn gold into bullion

### **Company Behavior:**

- Changes to the business name of entities registered to deal in gold.
- Trading company registration in a tax haven, even though its business relates to another jurisdiction.
  - Movement of abnormally large sums of money in individuals' and companies' accounts, unrelated to the nature of their business.
- Unusual deposits, i.e. use of cash or negotiable instruments (such as traveler's cheques, cashier's cheques and money orders) in round denominations (to keep below reporting threshold limit) to fund bank accounts and to pay for gold. The negotiable instruments may be sequentially numbered or purchased at multiple locations, and may frequently lack payee information.
- Numerous sole proprietorship businesses/private limited companies set up by seemingly unrelated people (proxies), but controlled by the same group of people. False addresses are used to register such businesses.
- Use of a corporate structure of shell companies located across different jurisdictions
- Gold industry organizations not reporting suspicious transactions to the UAE Financial Intelligence Unit (FIU), where there is an obligation to report.
- Significant number of companies registered to one natural person.
  - Commercial activities are not easy to track, as the companies are registered elsewhere.
  - No clarity on how the company transports its merchandise.

### **Trade-Based behavior (also related to Trade-Based ML)**

- Cash payments for high-value orders are an indication of trade-based ML (TBML) activity.
  - Misclassification of gold purity, weight, origin and value on customs declaration forms.
- Gold is shipped to or from a jurisdiction designated as 'high risk' for money laundering activities or sensitive/non-co-operative jurisdictions.
- Gold is transshipped through one or more such high-risk/sensitive jurisdictions for no apparent economic reason.
- Consignment size or type of commodity being shipped appears inconsistent with the exporter or importer's scale or capacity in their regular business activities, or the shipment does not make economic sense, i.e. there is no reasonable explanation for the client's financial investment in the shipment.
- The transaction involves the use of front or shell companies. Both shell and front companies can be used to facilitate TBML, but in different ways. A shell company has no real operating activity, and is used to hide ML activity and the identities of individuals involved, to obscure the money trail. If activity is traced to the company, it is literally an empty shell.



#### **Product Differentiation:**

- The bullion has physical characteristics that are inconsistent with industry standards.
- Gold prices are higher than those of the local gold market.

#### **Payment Behavior:**

- A number of affiliated entities in the payments chain.
- Transit movement of funds and changes in purposes of payments.
- Payments to shell companies with further withdrawals
- Granting of loans (with zero interest rates) to foreign companies or persons
- Natural person or business sells gold saying that it comes from a place with no extraction license or from places with no gold mines
- Large amount of funds transferred internationally, then withdrawn quickly.
  - International transfers to countries where the company is not registered.
- Significant cash withdrawals from bank accounts by participants within the gold trading industry.
- Division of funds in cheques and smaller cash transactions to pay for merchandise.
- Purchase of gold bullion with bank cheques may be an attempt to conceal the source of the funds and underlying ownership.
- The use of cash to purchase bullion, especially when there are multiple purchases in a short timeframe, or when large amounts are purchased at once, or when there are structured cash deposits into an account to finance a single gold bullion purchase.
- Original source of funds to buy gold bullion cannot be established. The transaction involves the receipt of cash (or by other payment methods, including cheques or credit cards) from third party entities that have no apparent connection with the transaction or front or shell companies or wire instructions / payment from parties which were not identified in the original letter of credit or other documentation. Transactions that involve payments for goods through cheques, bank drafts, or money orders not drawn on the account of the entity that purchased the items also need further verification
- Transactions between domestic buyers and sellers with sales proceeds sent to unknown third parties overseas.

#### **Predicated Crime Activity - Gold Mining Behavior:**

- Gold production and commercialization by a person or business without a license.
- An ethnic community hiring a third party for the entire operation of a mine.
- Licensed mines, where the production has decreased with no apparent explanation
- The development of mining activities using machinery and equipment that is not in accordance with the characteristics of the licensed small or artisanal mining
- The development of mining activities without compliance with the administrative, technical, social and environmental regulation
- The development of mining activities in prohibited areas.



## RISK INDICATORS FOR DPMS

- DPMS entity has a peculiar structure that is unreasonable and complex, e.g., there is potential involvement of shell companies, a parent or subsidiary of an offshore company, in which the UBO is difficult to identify or cannot be identified (whose main purpose is to hide the UBO and/or disguise fund transfers as a capital transfer or normal business transaction).
- DPMS set up as a front company (presence of real business activity; use to commingle legitimate and illegitimate funds, mainly used effectively in cash-intensive businesses).
- Large and complex transactional behaviors for newly established entities as DPMS.
- Unnecessarily maintaining multiple bank accounts for the same entity (DPMS) or opening accounts under the names of employees.
- DPMS entity or its representatives are transacting outside of the normal monetary system or are making excessive use of cash transactions.
- DPMS or its representatives are using gold as a medium of exchange.
- The circulation of funds between multiple DPMS accounts, or between ‘unrelated’ parties which are in different lines of business that might also be suspected of being ‘shell companies’ (no real business activity; incorporated for ML purposes exclusively).
- The transaction structure appears to be unnecessarily layered and designed to obscure the true origin of funds.
- DPMS entity’s owners, shareholders, or authorized signatories, or any of its counterparties, have been the subject of adverse news from a trusted media source.
- DPMS or any of its controlling persons, or its affiliates, have been found to be associated with a high-risk jurisdiction.
- DPMS entity that is heavily engaged in cross-border cash movement.
- DPMS entity repeatedly depositing large cash amounts in an account, or exchanging foreign currencies, which is supported by ‘cash declaration forms,’ also known as DRIC forms (Declaration Regarding Importation of Cash).
- DPMS or its representatives fail to provide a ‘customs declaration’ in relation to a local/foreign currency cash deposit related to buying/selling precious stones.
- DPMS entity engages in transactions and shipping routes or methods that are inconsistent with standard business practices.
- Contracts, invoices, or other trade documents provided by a DPMS have vague or missing descriptions, appear to be counterfeit (including false or misleading information), include a resubmission of previously rejected documents, or are frequently modified or amended.
- DPMS entity or any of its counterparties appear to import precious metals and stones that originate from a country in which there is limited production or no mines at all.
- Deposits or transfers are received in a DPMS account followed by the immediate transfer of similar amounts to another jurisdiction.
- DPMS entity and its associates, or multiple individuals (external parties), excessively conduct foreign exchange transactions (FOREX) without any business rationale.
- Payment for imported PMS made by an entity other than the consignee for no clear business reason, e.g., by a shell or front company not involved in a trade transaction.
- Cash deposits or other transactions of a DPMS entity (or its representatives) are consistently just below the relevant reporting thresholds (transactions conducted by multiple individuals to avoid reporting requirements).
- Transactions in a DPMS account(s) are seemingly of a pass-through nature, with funds directly debited via wire transfers leaving a low balance in an account.
- DPMS entity(s) excessively obtain loans or credit facilities, which are settled before the due date through cash or cheque repayments.
- DPMS entity(s) transfer payments amongst each other, which are related to 'borrowings' or 'loans' that is referred to as 'back-to-back' or 'loan-back'.



### **RED FLAG INDICATORS TO IDENTIFY TF POTENTIAL SANCTIONS CIRCUMVENTIONS**

- A large number of incoming or outgoing funds transfers take place through a business account, and there appears to be no logical business or other economic purpose for the transfers, particularly when this activity involves higher-risk locations.
- Funds transfers do not include information on the originator, or the person on whose behalf the transaction is conducted, when the inclusion of such information would be expected.
- Funds are sent or received via international transfers from or to higher-risk locations.
- Foreign exchange transactions are performed on behalf of a customer by a third party, followed by funds transfers to locations having no apparent business connection with the customer or to higher-risk countries.
- Transactions involving foreign currency exchanges are followed within a short time by funds transfers to higher-risk locations.
- Funds are generated by a business owned by persons of the same origin or by a business that involves persons of the same origin from higher-risk countries (e.g., countries designated by national authorities and FATF as non-cooperative countries and territories).
- Multiple accounts are used to collect and funnel funds to a small number of foreign beneficiaries, both persons and businesses, particularly in higher-risk locations.
- A customer obtains a credit instrument or engages in commercial financial transactions involving the movement of funds to or from higher-risk locations when there appear to be no logical business reasons for dealing with those locations.
- Transactions involving certain high-risk jurisdictions such as locations in the midst of or in proximity to, armed conflict where terrorist groups operate or locations, which are subject to weaker ML/TF controls.
- Multiple personal and business accounts or the accounts of non-profit organizations or charities are used to collect and funnel funds to a small number of foreign beneficiaries.
- An account opened in the name of an entity, a foundation or association, which may be linked or involved with a suspected terrorist organization.
- The use of funds by a non-profit organization is not consistent with the purpose for which it was established.
- Raising donations in an unofficial or unregistered manner.
- Client donates to a cause that is subject to derogatory information that is publicly available (e.g., crowdfunding initiative, charity, non-profit organization, non-government organization, etc.).
- Client identified by media or law enforcement as having travelled, attempted or intended to travel to high-risk jurisdictions (including cities or districts of concern), specifically countries (and adjacent countries) under conflict and/or political instability or known to support terrorist activities and organizations.
- Transactions involve individual(s) or entity(ies) identified by media and/or Sanctions List as being linked to a terrorist organization or terrorist activities.
- Client conducted travel-related purchases (e.g., purchase of airline tickets, travel visa, passport, etc.) linked to high-risk jurisdictions (including cities or districts of concern), specifically countries (and adjacent countries) under conflict and/or political instability or known to support terrorist activities and organizations.
- Individual or entity's online presence supports violent extremism or radicalization.
- Irregularities during the CDD process which could include, but is not limited to:
  - Inaccurate information about the source of funds and/or the relationship with the counterparty.
  - Refusal to honor requests to provide additional KYC documentation or to provide clarity on the final beneficiary of the funds or goods.
  - Suspicion of forged identity documents



## RED FLAG INDICATORS FOR POSSIBLE PF ACTIVITIES

### Customer Profile Risk Indicators

- During onboarding, a customer provides vague or incomplete information about their proposed trading activities. The customer is reluctant to provide additional information about their activities when queried.
- During subsequent stages of due diligence, a customer, particularly a trade entity, or its owners or senior managers, appears in sanctioned lists or negative news, e.g., relating to past ML schemes, fraud, other criminal activities, or ongoing or past investigations or convictions, including appearing on a list of denied persons for the purposes of export control regimes.
- The customer is a person connected with a country of proliferation or diversion concern, e.g., through business or trade relations, as identified through the national risk assessment process or by relevant national CPF authorities.
- The customer is a person dealing with Dual-Use goods, goods subject to export control goods, or complex equipment for which he/she lacks technical background, or that is incongruent with their stated line of activity.
- A customer engages in complex trade deals involving numerous third-party intermediaries in lines of business that do not accord with their stated business profile established at onboarding.
- A customer or counterparty, declared to be a commercial business, conducts transactions that suggest that they are acting as a money remittance business or a pay-through account. These accounts involve a rapid movement of high-volume transactions and a small end of day balance without clear business reasons. In some cases, the originators appear to be entities who may be connected with a state-sponsored proliferation program (such as shell companies operating near countries of proliferation or diversion concern), and the beneficiaries appear to be associated with manufacturers or shippers subject to export controls.
- A customer affiliated with a university or research institution is involved in the trading of Dual-Use goods or goods subject to export control.
- Customer activity does not match the customer's business profile, or end-user information does not match the end-user's business profile.
- A new customer requests a letter of credit transaction while awaiting approval of new account.

### Account and Transaction Activity Risk Indicators

- A transaction involves person or entity in foreign country of proliferation concern.
- A transaction involves person or entity in foreign country of diversion concern.
- A transaction involves financial institutions with known deficiencies in AML/CFT controls and/or domiciled in countries with weak export control laws or weak enforcement of export control laws.
- Wire transfer activity shows unusual patterns or has no business or apparent lawful purpose.
- The originator or beneficiary of a transaction is a person or an entity ordinarily resident of or domiciled in a country of proliferation or diversion concern, e.g., DPRK and Iran.
- Accounts or transactions involve possible companies with opaque ownership structures, front companies, or shell companies, e.g., companies do not have a high level of capitalization or displays other shell company indicators. Countries or the private sector may identify more indicators during the risk assessment process, such as long periods of account dormancy followed by a surge of activity.
- Business or compliance personnel identify links between representatives of companies exchanging goods, e.g., the same owners or management, physical address, IP address, or telephone number, or activities that appear to be coordinated.
- The account holder conducts financial transactions in a circuitous manner.
- A transaction or account activity involves an originator or beneficiary that is domiciled in a country with weak implementation of relevant UNSCR obligations and FATF Standards or a weak export control regime (also relevant to correspondent banking services).
- The customer of a manufacturing or trading firm wants to use cash in transactions for industrial items or for trade transactions more generally. For financial institutions, the transactions are visible through sudden influxes of cash deposits to the entity's accounts, followed by cash withdrawals.



- Transactions are made on the basis of “ledger” arrangements that obviate the need for frequent international financial transactions. Ledger arrangements are conducted by linked companies that maintain a record of transactions made on each other’s behalf. Occasionally, these companies will make transfers to balance these accounts.
- The customer uses a personal account to purchase industrial items that are under export control, or otherwise not associated with corporate activities or congruent lines of business.
- Account holders conduct transactions that involve items controlled under Dual-Use or export control regimes, or the account holders have previously violated requirements under Dual-Use or export control regimes.

#### **Maritime Sector Risk Indicators**

- An order for goods is placed by firms or persons from foreign countries other than the country of the stated end-user.
- A trade entity is registered at an address that is likely to be a mass registration address, e.g., high-density residential buildings, post-box addresses, commercial buildings, or industrial complexes, especially when there is no reference to a specific unit.
- The person or entity preparing a shipment lists a freight forwarding firm as the product’s final destination.
- The destination of a shipment is different from the importer’s location.
- Inconsistencies are identified across contracts, invoices, or other trade documents, e.g., contradictions between the name of the exporting entity and the name of the recipient of the payment; differing prices on invoices and underlying contracts; or discrepancies between the quantity, quality, volume, or value of the actual commodities and their descriptions.
- A shipment of goods has a low declared value vis-à-vis the shipping cost. A shipment of goods is incompatible with the technical level of the country to which it is being shipped, e.g., semiconductor manufacturing equipment being shipped to a country that has no electronics industry.
- A shipment of goods is made in a circuitous fashion (if information is available), including multiple destinations with no apparent business or commercial purpose, indications of frequent flags hopping, or using a small or old fleet.
- A shipment of goods is inconsistent with normal geographic trade patterns, e.g., the destination country does not normally export or import the goods listed in trade transaction documents.
- A shipment of goods is routed through a country with weak implementation of relevant UNSCR obligations and FATF Standards, weak export control laws, or weak enforcement of export control laws.
- Payment for imported commodities is made by an entity other than the consignee of the commodities with no clear economic reasons, e.g., by a shell or front company not involved in the trade transaction.

#### **Trade Finance Risk Indicators**

- A trade finance transaction involves a shipment route (if available) through a country with weak export control laws or weak enforcement of export control laws.
- A transaction involves persons or companies (particularly trading companies) located in countries with weak export control laws or weak enforcement of export control laws.
- A transaction involves a shipment of goods inconsistent with normal geographic trade patterns (e.g., does the country involved normally export/import good involved?).
- Based on the documentation obtained in the transaction, the declared value of the shipment is obviously under-valued vis-à-vis the shipping cost.
- Prior to account approval, the customer requests a letter of credit for a trade transaction to ship Dual-Use goods or goods subject to export control.
- Lack of full information or inconsistencies are identified in trade documents and financial flows, such as names, companies, addresses, final destination, etc. Identifying documents seem to be forged or counterfeited. Identifying documents seem to be tampered or modified documents with no apparent explanation, especially those related to international trade.
- Transactions include wire instructions or payment details from or due to parties not identified on the original letter of credit or other documentation.



## APPENDIX 2 – GOAML

### ABOUT GOAML SYSTEM

It is an internationally approved electronic system to collect and analyze financial and non-financial information to confront money laundering and combat the financing of terrorism. It aims to oblige finance establishment and DNFBPs to register in their systems and report for Suspicious Activity Reports, Suspicious and Unusual Transaction reports to the FIU. It thereafter enables the Financial Intelligence Unit (FIU) in the United Arab Emirates with better monitor trends during analyzing reports of suspicious activities and transactions to reduce potential threats at more efficient rate and potency.

Promise Gold Refinery FZC under the provision of the regulatory requirements, circulars is required to register their compliance officer to the Go AML system for reporting or raising any SARs/STRs/Unusual transactions.

To know more about the system and how to register, please click on the following link:

<https://www.moec.gov.ae/en/registering-companies-in-goaml>



## APPENDIX 3 – TFS ADDITIONAL OBLIGATIONS

<b>Implement the freezing cancellation decision</b>	Without delay, pursuant to Related UN Security Council Resolutions or decisions of the Cabinet regarding issuance of Local Terrorist List, and notify the Supervisory Authority and the Executive Office.
<b>Immediately notify</b>	Notify within five business days, the relevant Supervisory Authority and the Executive Office in the following cases and include the following information: <ol style="list-style-type: none"><li>1. Identification of targeted funds - the actions that have been taken as per requirements of related UNSC Resolutions or decisions of the Cabinet regarding issuance of Local Lists, including concerning attempted transactions.</li><li>2. Detection of any match with listed individuals or legal entities - details of its data and the actions that have been taken as per requirements of related UNSC Resolutions or decisions of the Cabinet regarding issuance of Local Terrorist Lists, including concerning attempted transactions.</li><li>3. If it was found that one of its previous customers or any occasional customer it dealt with, is listed on the Sanctions List or the Local Lists.</li><li>4. If there is any indication that one of its customers or former customers, or a person it has business dealings with, is an individual listed on the UN Sanctions List or the Local List or has a direct or indirect relationship with a Listed individual.</li><li>5. Similarity of names (notify even if no action has been taken / inability to remove such similarity through available or accessible information).</li></ol>
<b>Implement internal controls and procedures</b>	Set and effectively implement internal controls and procedures to ensure compliance with the obligations arising from the Cabinet Resolution No. 74 of 2020.
<b>Implement policies and procedures</b>	Set and implement policies and procedures that prohibit staff from, directly or indirectly, informing the customer or any third party that freezing action shall be implemented as per provisions of the Cabinet Resolution No. 74 of 2020.
<b>Cooperate</b>	Cooperate with the Supervisory Authority and the Executive Office in verifying accuracy of presented data



## APPENDIX 4- Enhanced Due Diligence Format

### Enhanced Due Diligence Review Template

Customer Onboarding Review	
Company Details	
Company Name	
TL Number	
Date of Incorporation	
Date of Expiry	
No Of years in Business	
Country of Incorporation	
MOA/AOA	
Nature of Business	
TRN Number Identified	
Value of Expected Transaction	
Source of Funds of Company	
Method of Payment	
UBO Identified and verified	
Website Details	
Screening Status	
PEP Association	
SHARE HOLDER DETAILS	
Share Holder 1	
Name of Shareholder	
KYC of Shareholder	
Nationality SH	
Residency Status / Country	
Share % in Company	
Screening Status	
Share Holder 2	
Name of Shareholder	
KYC of Shareholder	
Nationality SH	
Residency Status / Country	
Share % in Company	
Screening Status	
Share Holder 3	
Name of Shareholder 3	
KYC of Shareholder	
Nationality SH	
Residency Status / Country	
Share % in Company	
Screening Status	
RESPONSIBLE SUPPLY CHAIN PROGRAME REVIEW	
Conformance to OECD Rules	
Origin of Gold Declared	
Responsible Supply Chain Policy	
Logistics of Precious Metals	
Precious Metal Trading Agreement	
Anti-Bribery Policy	
Type of Gold Declared	
Risk Review Screening	
Risk Review Screening Company	
PEP Screening	
Sanction Screening	
Adverse Media Screening	
AML Programme Review	
Supply Chain Policy	



OECD Country Risk Rating	
Know Your Country Review	
<b>Risk Review Screening Shareholders</b>	
PEP Screening	
Sanction Screening	
Adverse Media Screening	
AML Review	
World Check Screening	
OECD Country Risk Rating	
Know Your Country Review	
<b>Documentation Status</b>	
PEP Declaration	
AML Policy of Company	
Sanction Declaration	
Conformance to Non-Conflict	
Account Opening Form	
UBO KYC	
Company KYC	
<b>Additional Miners and Exporters Documentation (Only for International Suppliers)</b>	
Mine License Number	
Gold Export License Copy	
Mining Policy	
Exploration License/Permit	
Origin of Gold Declaration	
<b>Feed Back of Review</b>	
<b>List of Missing Documents</b>	
<b>Findings and Recommendation of Compliance Officer</b>	
<b>COMPLIANCE HEAD REMARKS</b>	

Details	Names	Signature
Prepared by		
Approved by		



## APPENDIX -5

### Standard Due Diligence Format and Risk Grading

Name of Entity:		
Length of Business	Risk Factor	Risk Grade
	Up to 1 year	Medium Risk
Date of Expiry	1 year and above	Low Risk
	Risk Factor	Risk Grade
	Unwilling to give Documents	High Risk
Nature of Business Matching with Profile	Expired Documents	Medium Risk
	Valid Documents	Low Risk
	Risk Factor	Risk Grade
Country of Registration	No	High Risk
	Yes	Low Risk
<i>To be Identified from the Account Opening Form</i>		
<b>Risk Rating of the Country of Incorporation</b> <i>Based on the Know Your Country Risk Rating and FATF Rating – Classification would be based on Low Risk, Medium Risk and High Risk – Risk Grading methodologies are explained in the AML Policy. <a href="https://www.knowyourcountry.com/methodologies-sources">https://www.knowyourcountry.com/methodologies-sources</a></i>		
Type of Company Establishment	<i>To be identified via Trade License</i>	
	Risk Factor	Risk Grade
Licensing Authority	LLC- UAE	Low Risk
	- UAE	Low Risk
	Foreign Company	Medium Risk
<i>To be Identified from the Account Opening Form</i>		
Ownership Structure Break Up how many Shareholders less than 25% with KYC documents	<i>To be identified via Trade License and MOA</i>	
	Risk Factor	Risk Grade
	With KYC Document	Low Risk
TRN Number Identified	Majority of Shareholder > 25% without KYC	Medium Risk
	Shareholders Without documents	High Risk
	Risk Factor	Risk Grade
Shareholders Identified via Proper KYC documents	No	High Risk
	Yes	Low Risk
Shareholders nationality Risk Factor	Risk Factor	Risk Grade
	No	High Risk
	Yes	Low Risk
<i>Based on the Know Your Country Risk Rating and FATF Rating – Classification would be based on Low Risk, Medium Risk and High Risk – Risk Grading methodologies are explained on the AML Policy <a href="https://www.knowyourcountry.com/methodologies-sources">https://www.knowyourcountry.com/methodologies-sources</a></i>		
<b>Source of Funds Identified</b> <i>To be Identified from Account Opening Form and Audited Financial Statement / Bank Statement</i>		
<b>PEP Factor Identified for Shareholders</b> <i>To be Identified from Account Opening Form and Conducting world Check</i>		
<b>Declaration of Not Sourcing from High-Risk Country</b> <i>To be Identified from Account Opening Form and Document Collection</i>		
<b>Implementation of Go AML UAE</b> <i>To be Identified from Account Opening Form</i>		
<b>Implementation of AML Policy</b> <i>To be Identified from Account Opening Form and Collecting of Policy</i>		
<b>Implementation of UAE Cabinet issued Resolution (74) of 2020?</b> <i>To be Identified from Account Opening Form</i>		



<b>Responsible for Sourcing of Precious Metal</b>	<i>To be Identified from the Account Opening Form and Collection of Policy</i>
<b>Complete Account Opening Forms</b>	<i>To be Identified from the Account Opening Form</i>
<b>Review Final Rating</b>	

Details	Names	Signature
<b>Prepared by</b>		
<b>Approved by</b>		



## APPENDIX -6

### Cabinet Decision No. 132 of 2023 — Administrative Penalty Matrix

No.	Violation / Non-Compliance	Administrative Penalty	Legal Basis
1	Failure to identify and verify the identity of customers, beneficial owners, or UBOs before establishing or continuing a business relationship	AED 100,000 – AED 1,000,000	Art. 6 & Art. 7 of Cabinet Dec. 10/2019
2	Failure to implement a risk-based approach or to conduct a risk assessment (EWRA or customer level)	AED 50,000 – AED 500,000	Art. 15 Cabinet Dec. 10/2019
3	Failure to report a suspicious transaction (STR/SAR/DPMSPR/PNMR) to the FIU within the prescribed period	AED 200,000 – AED 1,000,000	Art. 9 Cabinet Dec. 10/2019
4	Failure to maintain records or data for the minimum 5-year period	AED 50,000 – AED 200,000	Art. 17 Cabinet Dec. 10/2019
5	Failure to apply Enhanced Due Diligence for high-risk countries or PEPs	AED 200,000 – AED 1,000,000	Art. 8 Cabinet Dec. 10/2019
6	Dealing with persons or entities listed on UN/Local TFS sanctions lists	AED 500,000 – AED 5,000,000 + possible license suspension	Cabinet Dec. 74/2020 & 132/2023
7	Obstructing inspection, refusing to provide information, or providing false information to the Competent Authority	AED 50,000 – AED 500,000	Art. 22 Cabinet Dec. 132/2023
8	Failure to establish or maintain an independent Compliance Officer function	AED 100,000 – AED 300,000	Art. 20 Cabinet Dec. 132/2023
9	Failure to provide AML/CFT training for employees	AED 50,000 – AED 200,000	Art. 23 Cabinet Dec. 132/2023
10	Failure to register on the goAML platform or update information	AED 100,000 – AED 500,000 + license suspension until rectified	MoE Circular (03/2024) pursuant to Cabinet Dec. 132/2023



# Promise Gold Refinery FZC

## Account Opening Form – Corporate

PGR/AOF/2023/Rev-01A

ACCOUNT NAME	
ACCOUNT NUMBER	



### CHECKLIST OF THE DOCUMENTS REQUIRED:

<input type="checkbox"/>	Copy of Trade License
<input type="checkbox"/>	Copy of Certificate of Incorporation
<input type="checkbox"/>	Copy of Memorandum of Association
<input type="checkbox"/>	Copy of Articles of Association (if available)
<input type="checkbox"/>	Proof of Company Office Address (Copy of Tenancy Contract / Utility bill)
<input type="checkbox"/>	Proof of Residency – Partners/Shareholder (Copy of Tenancy Contract / Utility bill)
<input type="checkbox"/>	Copy of Shareholder Passport and Visa page
<input type="checkbox"/>	Copy of TAX Registration Number
<input type="checkbox"/>	Copy of Financial Statements

**Important Notice:** Customers who wish to open a Business Account with us must submit the following documents. Failure to send the minimum document required will cause delay or ultimately rejection of the application

### ACCOUNT OPENING FORM



### 1. COMPANY DETAILS

a. Company Registered Name					
b. Registered Address					
c. Business Address					
d. Contact Details:	Contact Person Name				
	Contact Person Designation				
	Landline Number				
	Mobile Number				
	Fax Number				
	Email				
e. Date of Incorporation					
f. Country of Incorporation					
g. Business Registration Number					
h. Tax Identification number					
i. Website					
j. External Financial Auditors	<input type="checkbox"/> YES <input type="checkbox"/> NO				
k. No. of Subsidiaries (if any) and Details:					

### 2. BUSINESS ACTIVITY

a. Type of Business (Please Tick the relevant)	<input type="checkbox"/> Precious Metal Trader:		<input type="checkbox"/> Retailer (Jewellery)		
	<input type="checkbox"/> Scrap dealer		<input type="checkbox"/> Exporter		
	<input type="checkbox"/> Wholesaler / Manufacturer		<input type="checkbox"/> Investment Company		
	<input type="checkbox"/> Refinery		<input type="checkbox"/> Others (Please specify):		
b. Description of core business activity					
c. No of years in the business					
d. Number of Employees					
e. Does your establishment have Politically Exposed Persons (PEPs) in the Management	<input type="checkbox"/> YES <input type="checkbox"/> NO If yes, please provide Details:				
f. Please specify method of payment (%)	Cash: Bank: Cheque:				

### 3. LIST OF SUPPLIERS AND CUSTOMER DETAILS

SL No	Supplier and Customers Name	Country of origin	Website Details
-------	-----------------------------	-------------------	-----------------



1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

#### 4. ORIGIN OF PHYSICAL PRECIOUS METALS

a. Profile of your precious metal's suppliers (Individual / Company)	
b. Country of origin of the precious metals delivered	
c. Countries of destination of precious metals delivered once refined	

#### 5. DESCRIPTION OF PRECIOUS MATERIAL

Type of Material to be deposited																	
Monthly Estimated Turnover																	
Estimated Precious Metal Content (%)	<table border="1"><tr><td>Gold</td><td></td></tr><tr><td>Silver</td><td></td></tr><tr><td>Other:</td><td></td></tr></table>	Gold		Silver		Other:											
Gold																	
Silver																	
Other:																	
What are the types, forms and percentage of precious metals sourced by the Company	<table border="1"><tr><td colspan="2">Recycled Precious Metals</td></tr><tr><td>LBMA Good Delivery Bullion</td><td></td></tr><tr><td>Non LBMA Good Delivery Bullion</td><td></td></tr><tr><td>Jewellery</td><td></td></tr><tr><td>Broken jewellery</td><td></td></tr><tr><td>Coins</td><td></td></tr><tr><td>Mined precious metals</td><td></td></tr><tr><td>Others:</td><td></td></tr></table>	Recycled Precious Metals		LBMA Good Delivery Bullion		Non LBMA Good Delivery Bullion		Jewellery		Broken jewellery		Coins		Mined precious metals		Others:	
Recycled Precious Metals																	
LBMA Good Delivery Bullion																	
Non LBMA Good Delivery Bullion																	
Jewellery																	
Broken jewellery																	
Coins																	
Mined precious metals																	
Others:																	
What is the form of precious metals planned to be sent for refining?	<table border="1"><tr><td colspan="2">Non-Recycled Precious Metals</td></tr><tr><td>LBMA Good Delivery Bullion</td><td></td></tr><tr><td>Non LBMA Good Delivery Bullion</td><td></td></tr><tr><td>Jewellery</td><td></td></tr><tr><td>Broken jewellery</td><td></td></tr><tr><td>Coins</td><td></td></tr></table>	Non-Recycled Precious Metals		LBMA Good Delivery Bullion		Non LBMA Good Delivery Bullion		Jewellery		Broken jewellery		Coins					
Non-Recycled Precious Metals																	
LBMA Good Delivery Bullion																	
Non LBMA Good Delivery Bullion																	
Jewellery																	
Broken jewellery																	
Coins																	



	Mined precious metals	
	Others:	

## 6. BANKING INFORMATION

Bank Name / Branch	
Bank address	
Bank SWIFT Code	
Bank account number	
Bank IBAN number	
Account Name ( <i>as per statement</i> )	

## 7. SOURCE OF FUNDS DECLARATION

Source of Income	<input type="checkbox"/> Investment Income <input type="checkbox"/> Business Earning <input type="checkbox"/> Salary <input type="checkbox"/> Property Income <input type="checkbox"/> Other (Please Specify):
Estimated Annual Income	<input type="checkbox"/> AED 1-25 Million <input type="checkbox"/> AED 25-50 million <input type="checkbox"/> AED 50-100 Million <input type="checkbox"/> AED100 Million and Above
Estimated Total Net worth	<input type="checkbox"/> AED 1-25 Million <input type="checkbox"/> AED 25-50 million <input type="checkbox"/> AED 50-100 Million <input type="checkbox"/> AED100 Million and Above

### Declaration:

I/We understand that I/we am/are required to declare the source of funds that I/we will be using for the purpose as stated in this application as a part of **Promise Gold Refinery FZC requirement** to open an account. I/We understand the requirements of the Federal Decree-Law No. (20) of 2018 On Anti-Money Laundering and Combating the Financing of Terrorism and Financing of Illegal Organizations and the Cabinet Decision No (10) of 2019 Concerning the Implementing Regulation of Decree Law no. (20) of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations and do hereby undertake that the source of funds/metals are acquired from legitimate sources and evidence of such is available if needed or as requested.

I/We do hereby undertake that the funds/metals do not originate from any sanctioned country/entity/person/s from the United Nations and other relevant sanction programs. We are authorizing to Compliance Department of **Promise Gold Refinery FZC** can contact our dedicated compliance person at any time to obtain documents for periodic assessment, additional documents requirement, AML Questionnaire etc.

## 8. FINANCIAL INFORMATION

Particulars	Currency	Last Reporting Period	Previous Year
a. Share Capital			
b. Total Shareholder's Equity			
c. Total Balance Sheet			
d. Sales			
e. Net Income			



## 9. MANAGEMENT STRUCTURE

### Board of Directors

Name	Nationality	Date of Birth	Passport Number	Passport Expiry	UAE Residency

### Top Management

Name	Nationality	Date of Birth	Passport Number	Passport Expiry	UAE Residency

### Ultimate Beneficial Owners UBOs (owns more than 25% of the company's shares or more)

Name	Nationality	Date of Birth	Passport Number	Passport Expiry	UAE Residency

## 10. Shareholders/Ultimate Beneficial Owner Details

Are shareholders/ultimate beneficiaries a PEP or Associated to a PEP	
Are the company or ultimate beneficiaries listed as sanctioned entity by any country or UNSCR	
Any previous or existing business dealing (by company or ultimate beneficiaries) with individuals/entities in the countries listed under sanctions or embargo list of UAE, UNSCR & USA's Office of Foreign Asset Control, Department of the Treasury ("OFAC"), or otherwise subject to any U.S. sanctions administered by OFAC	
Any previous or existing proceeding or any possibility for initiation of proceedings against the company or ultimate beneficiaries for violation of Anti-Money Laundering or Combating Terrorism Financing laws of any country	

## 11. Sanction Declaration

Do you deal any sanctioned country?	<input type="checkbox"/> YES
If yes, please mention which	<input type="checkbox"/> NO
Has your company implemented UAE Cabinet issued Resolution (74) of 2020	<input type="checkbox"/> YES <input type="checkbox"/> NO
Has your company Subscribed to the United Nation Consolidated List and UAE Terrorist list? from the Executive Office website <a href="http://www.uawiec.gov.ae">www.uawiec.gov.ae</a>	<input type="checkbox"/> YES <input type="checkbox"/> NO
Does your company deal with individuals, entities, groups or undertakings, which fall in "UAE Terrorist List" and "UN Nation Consolidated List"	<input type="checkbox"/> YES <input type="checkbox"/> NO



## REPRESENTATIVES AUTHORIZATION

We hereby authorize the following representative(s) to conduct purchase or sale of precious metals and stone or approved product and services on behalf of our company and to sign the necessary transaction

related vouchers. His/her original identity documents will be produced by him/her to verify at the time of conducting the transaction.

We also undertake complete responsibility of these transactions and agree to provide you necessary evidence in respect of regulatory related documents if warranted.

Details	Representative1	Representative 2
<b>Employee Name</b>		
<b>Designation</b>		
<b>Emirates ID Number</b>		
<b>Contact Number</b>		
<b>Signature</b>		



## AUTHORIZED SIGNATORIES

The persons named below are authorized to represent the company in its business relationship with Promise Gold Refinery FZC without restrictions. They are authorized to operate accounts and safekeeping accounts in the company's name, enter obligations on buying & selling of bullion, issuing payment order, placement of overnight/ GTC order for bullion, authority to sign consignment agreement for bullion and other instruments on behalf of the company. Regardless of any changes published in the commercial register and in case of death or loss of capacity to act of the proprietor of a sole proprietorship, the signatures below and the corresponding signatory and representative rights are valid until revoked by special written notice to Promise Gold Refinery FZC

NAME	TITLE	SIGNATURE



## DECLARATION

Customer/Beneficial Owner hereby declares and covenants that it is the beneficial owner of good to be delivered to Promise Gold Refinery FZC or, if it is not, then that beneficial owner of such goods is (Company name/tradename, address, country/nationality), that its funds held in banks and its companies do not directly or indirectly fall within the scope of the sanctions imposed by the Security Council of the United Nations and have not violated and do not violate any sanction of the security council of the United Nation and the money laundering laws of any jurisdiction in the World and that such funds are not related in any way with the sanctions imposed by the resolutions of the Security Council of the United Nations, that it has acquired such goods from persons who have produced evidence that they are the legitimate owners of the goods; that it has taken all necessary measures to prevent its acquisition and trade of goods obtained thought or related to criminal activities, or that fund, promote or cover up criminal activities; and that it has not financed conflict, have not participated in abuse of human rights or money laundering, nor financed terrorism at any point in the supply chain or have directly/indirectly supported non-state armed groups or public or private security forces; that it has received such goods in compliance with the relevant legislation of their country of origin; and that it does not fraudulently misrepresent the origin of gold; that it does not use child labor to carry out any work or service; that it complies with applicable environmental regulation and fulfils all legal provisions regarding protection of environment and sustainable development; that it does not offer, promise or give any undue advantage, and/or bribe whether directly or through intermediaries, to a foreign public official or a private sector employee in order to obtain business or any other advantage; and that in case of a corporate entity customer/beneficial owner, that it complies with OECD'S due diligence and for responsible supply chains of minerals from conflict affected and high risk areas and gold supplement guidance, LBMA responsible gold guidance; have not participated in systematic or wise spread human right abuses with extraction transport or trade of gold direct or indirect support to non-state, armed groups or public or private security forces, bribery and fraudulent misrepresentation of the origin of gold, contribution to conflict, the customer/beneficial owner makes this present declaration on behalf of its shareholders, members of the board, its employees and representatives, and that it undertakes to carry out all of the activities within the scope of this declaration in such a way that its providers, its consultants, customers and other associates, abide by these principles, and that it shall advise Promise Gold Refinery FZC of any change to this declaration.

You will be required to validate and provide all the information mentioned in our Questionnaire forms, whether the said party is the main source of Metal or the subcontractor. You will remain responsible and accountable for certification and external audit of supplied precious metals to Promise Gold Refinery FZC.

If any of the foregoing is discovered to be false, customer/beneficiary owner agrees and covenants to indemnify Promise Gold Refinery FZC for any direct and indirect loss and damage incurred by it as a result of the same, upon the first written demand of Promise Gold Refinery FZC and that all liability arising there from shall be solely assumed by it.

NAME	TITLE	SIGNATURE



## KYC QUESTIONER

### A. ANTI MONEY LANDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)

Does the company have a person responsible for AML – CFT matters(Due diligence, AML policies and training) If yes, please provide details (name, designation, contact number and email address)	<input type="checkbox"/> YES <input type="checkbox"/> NO  <i>(If yes, please attach the copy)</i>
Does your company implement policies and procedures applicable to all branches and subsidiaries related to local and international covering Cabinet Decision No. (10) of 2019 Anti -Money Laundering and Combat Terrorist Financing?	<input type="checkbox"/> YES <input type="checkbox"/> NO  <i>(If yes, please attach the copy)</i>
Does the company conduct an AML-CFT training for Employee	<input type="checkbox"/> YES <input type="checkbox"/> NO  <i>(If yes, please attach the copy)</i>
Does the company delegate to third parties some of the compliance functions to be carried out? If yes, what function and which company do you delegate?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Did your establishment sign up to the GOAML system of the FIU? 1) Update all Cash and Wire Transaction above AED55,000/- 2) Report Suspicious activity /Transaction	<input type="checkbox"/> YES <input type="checkbox"/> NO If No Provide the Reasons:
Does your Company have checks in place to identify if its customers / clients and their beneficial owners are ‘Politically Exposed Persons’ (PEPs)?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Does your company conduct risk assessment considering the results of the National Risk Assessment and Geographic risk?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Does your establishment have procedures in place to check if its customers / clients and any other parties (such as beneficial owners) are subjects of targeted financial sanctions by the United Nations Security Council, the UAE, or any other relevant body as per UAE Cabinet issued Resolution (74) of 2020?	<input type="checkbox"/> YES <input type="checkbox"/> NO If No Provide the Reasons:

### B. ANTI- BRIBERY POLICY

a. Does your Company have any anti-bribery policy in place?	<input type="checkbox"/> YES <input type="checkbox"/> NO  <i>(If yes, please attach the copy)</i>
b. Has the company, or the Senior Management ever been charged anywhere in the world for violation of applicable anti-bribery laws or regulations?	<input type="checkbox"/> YES <input type="checkbox"/> NO  <i>(If yes, please attach the copy)</i>

### C. TRANSACTIONAL MONITORING

Does your company have a risk based- assessment of its preciousmetals from suppliers (e.g., Low, Medium, High)	<input type="checkbox"/> YES <input type="checkbox"/> NO  <i>(If yes, please attach the copy)</i>
Does the company perform a risk-based assessment to understand the normal and expected transaction of its suppliers (to identify the unusual transaction)	<input type="checkbox"/> YES <input type="checkbox"/> NO
Does the company have monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments (e.g., traveler's cheques) or third- party payments	<input type="checkbox"/> YES <input type="checkbox"/> NO

**D. ENVIRONMENT REGULATORY**

Does your company comply with detailed health & safety regulations in the country/ province of operations?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Does your company comply with detailed environmental regulations in the country/ province of operations?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is child labor regulated in mining activity in the country/ province of operations?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are public security forces used on or around the mine site?	<input type="checkbox"/> YES <input type="checkbox"/> NO

**E. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY**

Does your company establish a responsible supply chain of metal from conflict-affected and high -risk areas policy which is with the standards of the OECD Due Diligence guidance for responsible Supply chain of Minerals from Conflict-Affected and High-Risk Areas	<input type="checkbox"/> YES <input type="checkbox"/> NO (If yes, please attach the copy)
Do you implement systems for the identification of your suppliers and retain related documents in accordance with the DMCC rules for RBD-GPM/ OECD Guidelines.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Do you implement policies and procedure designed to meet and implement the DMCC rules for RBD-GPM/ OECD Guidelines.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Do you implement a formal responsible supply chain policy that identifies and mitigates related risk in accordance with DMCC in alignment with the OECD Due Diligence for responsible supply chain of minerals from conflicted and high- risk areas?	<input type="checkbox"/> YES <input type="checkbox"/> NO (If yes, please attach the copy)
Are you active in primary Mine supply (e.g., Dore Bars)?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are you active is secondary supply (e.g. Scrap Jewellery)?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Do you currently / potential source metal from conflicted andhigh-risk areas	<input type="checkbox"/> YES <input type="checkbox"/> NO
Does the risk assessment consider delivery channels risk?	<input type="checkbox"/> YES <input type="checkbox"/> NO



## DECLARATION

I/ We hereby declare that the information given above is true and accurate as of the date of writing. I/we undertake to automatically inform Promise Gold Refinery FZC **of** any material changes.

Details	Authorized signatory	Authorized signatory
Signature:		
Print Name:		
Company Name		
Date and location:		



## Suppliers Code of Ethics

### 1. Purpose

This Standard governs the conduct of all Suppliers of all types and forms of precious metals to the Promise Gold Refinery FZC . It sets the standards of ethical conduct that is required from the supplier community, provides for self-certification against all standards, validation of the self-certification, and procedures for proceeding or terminating contracts with suppliers that do not meet these standards.

### 2. Application

Social responsibility guides the operation Promise Gold Refinery FZC in the conduct of its business in the global precious metals industry. This Standard has been designed to help Suppliers understand their responsibilities and to create an awareness of the business and ethical standards that they must follow in their business dealings with Promise Gold Refinery FZC. The key attributes that we expect from our Suppliers are:

- Integrity
- Honesty and,
- The highest ethical standards
- 

### 3. Administration and Interpretation

Enquiries, comments and recommendations related to this Standard and supporting Procedures must be communicated to the Compliance Officer of Promise Gold Refinery FZC.

Definitions applicable to the understanding and application of the requirements contained in this

Standard are located in Appendix A and Appendix B.

Suppliers must read, understand and accept in writing the following conditions of dealing with the Promise Gold Refinery FZC

### 4. Compliance with Laws

Suppliers must comply with all applicable laws, rules and regulations in every jurisdiction in which they do business with Promise Gold Refinery FZC. Local laws might change in restriction to this Standard in some instances. In such events, Suppliers are expected to comply with this Standard, even if the conduct would otherwise be legal under applicable laws. If local laws are more restrictive than this Standard, Suppliers are expected to, at a minimum, comply with applicable local laws.

### 5. UN Global Compact

The ten principles of the Global Compact are based on internationally recognized norms and conventions in four critical areas: Human Rights, Labor Standards, the Environment, and Anti-corruption. In all business dealings with Promise Gold Refinery FZC, Suppliers must comply with the principles of the UN Global Compact (see appendix A for reference).

### 6. OECD Guidance/DMCC rules for Responsible Supply Chains for Gold and Other Precious Metals

In 2012 the OECD issued a “Supplement on Gold” to its paper on Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Area. This provides a common reference for all participants in the supply chain.

This is to ensure responsible sourcing and chain of custody of gold and other precious metals and to eliminate or at least mitigate the risk of direct or indirect support to any kind of conflict in accordance with international standards. Promise Gold Refinery FZC is committed to adopting these practical guidelines and is also fully committed to uphold the DMCC rules for the ethical supply chain at all times.

It is the responsibility of every one of our suppliers to fully understand the OECD guidelines and DMCC Rules for RBD in the Gold and Precious Metal Supply Chain in order to ensure that they are in full compliant with the principals of responsible supply chain management of precious metals. (See Appendix B for reference)

### 7. Certification

Promise Gold Refinery FZC will certify and approve suppliers and accept their products once the supplier has passed our specialized assessment process, verification, and monitoring procedures. Post certification, the supplier becomes a nominated entity to enter any deal with Promise Gold Refinery FZC whenever required. The certification will occur at the outset of the relationship with the supplier and will be an ongoing process and subject to review at least annually.



Promise Gold Refinery FZC has the right, but not the obligation, at its sole discretion to terminate the business relationship at any point if the standards required are not met by the supplier for any business-related reasons. At the time of any termination for the business relationship with the supplier, Promise Gold Refinery FZC will decide at its sole discretion whether or not to disclose the reasons for any such action.

#### **8. Acknowledgement of Policy by The Supplier**

I / WE acknowledge that I / WE have read and understand Promise Gold Refinery FZC Suppliers Code of Ethics and Appendices and agree to always comply with its provisions during the business relationship with the company.

**Name:**

**Supplier:**

**Authorized Signature**

#### **For Official Compliance Use Only**

Details	Proposed By	Approved by
<b>Signature:</b>		
<b>Print Name:</b>		
<b>Designation:</b>		
<b>Date and location:</b>		
<b>Feedback:</b>		



## STATEMENT OF CONFORMANCE OF RECYCLED GOLD ORIGIN

\_\_\_\_ confirms that, based on our KYC due diligence practices, our recycled gold does not originate from illegal sources and is in conformance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Supplement on Gold and with Dodd-Frank Act's Section 1502 on conflict minerals requirements.

Our precious metal originates from the following countries:

1.	6.
2.	7.
3.	8.
4.	9.
5.	10.

We confirm the gold sent is not:

- Sourced, mined, refined, re-melted, or manufactured in Venezuela after November 1<sup>st</sup>, 2017
- Sourced, mined, refined, re-melted, or manufactured in any Conflict Zone or Sanctioned Countries.
- In conflict with any sanctions against Russia, Russian legal entities, and persons, and is accompanied by documents which can prove this.

\_\_\_\_ also confirms to keep record of all customers' data according to the local AML laws.

### Authorised Signatory:

Name:

Signature:

Stamp:



## POLITICALLY EXPOSED PERSON (PEP) DECLARATION

### 1. Account Holder Name:

I/we would like to open a trading account with **Promise Gold Refinery FZC**. I confirm having read the definition of PEP as below and confirm my status by ticking the appropriate item as per point 2 and also by responding to your questions.

### 2. Definition of PEP

Defined are natural persons who have been entrusted with prominent functions either in the United Arab Emirates, in a foreign country or in an international organization such as:

- (1) Head of State or Government; Ministers, Second Ministers or Ministers of State, Members of Parliament, or Nominated Members of Parliament, Director / General or Senior Politician or High- Ranking Official in the public administration, the judiciary, the armed forces or political party; Senior Executive Officer of a state-owned enterprise of national importance, publicly owned Companies or Entities (including Charitable Organizations, Societies or Associations).
- (2) Immediate family members of such persons as set out under such as: the spouse, son / adopted son or stepson, daughter /adopted daughter or stepdaughter, father or step-father, mother or step-mother, brother or adopted brother or step-brother; and sister or adopted sister or step-sister.
- (3) Any natural person who has joint beneficial ownership of legal entities or legal arrangements including trusts, or any other close business relations with a person as set out under (1) & (2).
- (4) Any natural person who has sole beneficial ownership of legal entity, which is known to have been set up for the benefit de facto of the persons set out under (1) & (2).

### 3. Please tick as appropriate:

- a)  I hereby declare that I am not a Politically Exposed Person as defined above.
- b)  I hereby declare that I am a Politically Exposed Person and I hold / held Prominent Public Office as stated above.
- c)  I hereby declare that I have / had personal or business relations with any such persons as stated above.
- d)  I hereby declare that I have / had a close family likely to be involved with any such persons as stated above.

If you ticked b, c or d above, please give full details (name of person, position, domicile, contact details)

### Accuracy of Information:

I hereby certify that the information provided herein are accurate and I undertake to provide you with any change that could affect directly or indirectly my current declaration upon the change being effective I hereby declare that the information provided herein cancel and supersede any information I may have previously provided to **Promise Gold Refinery FZC** by virtue of any signed agreement and/or document and/or form.

### Company Name:

### Authorized Signatory Signature and Company Stamp:



## DECLARATION OF SOURCE OF FUNDS

I/ We, the Authorized Signatory of \_\_\_\_\_ and the undersigned hereby confirm that the accumulated wealth is derived from legitimate sources, which are not linked and/or derived from criminal origin, of whatsoever nature, and in particular do not constitute the proceeds of money laundering or terrorist financing. The origins of my accumulated wealth are provided below in this document.

I/ We, declare that the source of funds that I/we possess are from (Tick the appropriate)

Salary	Inheritance
Business Income	Investment Income
Dividend	Profits from property sale
Interest	Rental Income
Others:	

I/We understand that I/we am/are required to declare the source of funds that I/we will be using for the purpose as stated in this application as a part of **Promise Gold Refinery FZC** requirement to open an account. I/We understand the requirements of the Federal Decree-Law No. (20) of 2018 On Anti-Money Laundering and Combatting the Financing of Terrorism and Financing of Illegal Organizations and the Cabinet Decision No. (10) of 2019 Concerning the Implementing Regulation of Decree Law no. (20) of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations and do hereby undertake that the source of funds/metals are acquired from legitimate sources.

I / We declare that information provided in this form is true and complete. I agree to provide **Promise Gold Refinery FZC** with any further information or supporting documentary evidence in respect of the sources of wealth upon request.

Full name of the Authorized Signatory: .....

Signature of the Authorized Signatory: .....

**Note: The Details of the supporting documents that we would require based on your selection are provided in Annexure 1.**



## Annexure 1

SL No	Type of Income	Details Required (Any Two)
1	Salary	Pay Slips Salary Certificate Bank Statement
2	Business Income	Audited Financials Trade License Copy Chamber of Commerce Registration Tax Registration Nature of Business Bank Statement
3	Dividend	Dividend Letter Bank Statement Proof of share purchase
4	Interest	Investment Proof Deposit Proof Bank Statement
5	Inheritance	Solicitor \ lawyer's signed letter Benefactors source of income Proof of relationship
6	Investment Income	Share certificate Contract note/statement Bank statement Proof of Liquidation
7	Profits from property sale	Title deed from the land registry Sale Agreement copy Valuation Certificate Bank Statement
8	Rental Income	Title deed Copy Ejari Copy Lease agreement Rental receipts Declaration from real estate management entity
9	Other Source of Income <ul style="list-style-type: none"><li>• Pension</li><li>• Family Support</li><li>• Compensation payment</li><li>• Gifts</li><li>• Divorce Settlement</li><li>• Lottery Winning Settlement</li><li>• Sale of Family Antiques</li></ul>	Based on the Other source of Income the required supporting documents would be informed accordingly.



**Date:**

To,

Promise Gold Refinery FZC

Dubai, UAE

**Subject: Sale of Gold Bars**

**Ref Invoice Number:**

With reference to captioned Gold Bars sold to you we hereby represent and warrant that:

1. We have full legal and beneficial title to the gold bars which are free from any security interest or other rights of any third-party.
2. The authorized signatory signing this letter has full rights, power and authority to execute, deliver and perform this letter and delivery of the gold bars and that this letter constitutes our legal, valid and binding obligation.
3. To the best of our knowledge after making due inquiry all gold we supply to you has been refined by refiners who operate in accordance with the latest Dubai Multi Commodities Center Authority's guidance (DMCC Guidelines) and OECD Due Diligence Guidance for responsible sourcing of precious metals.
4. We do not conduct any business in or with any corporate or unincorporated body, or with any individual connected (however remotely) with the UN sanctioned countries or any conflict -affected or high-risk zone.
5. We have not invested or participated in any business, in or any corporate or unincorporated body, or with any individual connected (however remotely) with the UN Sanctioned countries or any conflict affected areas or high-risk zone.
6. We do not provide any support directly or indirectly to any UN Sanctioned countries or any conflict affected or high-risk zone.
7. We have conducted necessary customer due diligence to establish a responsible gold supply chain and to ensure that the gold bars sold/ delivered to you are meeting the following conditions:
  - a) Gold bars are not obtained directly from any UN sanctioned countries or any conflict affected or high-risk zone.
  - b) There has been no human right abuse involved in the supply chain
  - c) No criminal organization or criminal activity is involved in the supply chain
  - d) No Money laundering activity is involved in the supply chain

We confirm that the above representations have been applied to all our delivery of gold bars till date and shall remain continuous obligation in our effort to establish a responsible gold supply chain.

For,

Authorized Signatory



## GOLD DECLARATION FORMS

Customer/Beneficiary Owner hereby declares and covenants that it is the beneficial owner of good to be delivered to **Promise Gold Refinery FZC** or, if it is not, then that beneficial owner of such goods is \_\_\_\_\_ (name/tradename,country/nationality), that its funds held in banks and its companies do not directly or indirectly fall within the scope of the sanctions imposed by the Security Council of the United Nations and have not violated and do not violate any sanction of the security council of the United Nation and the money laundering laws of any jurisdiction in the World and that such funds are not related in any way with the sanctions imposed by the resolutions of the Security Council of the United Nations, that it has acquired such goods from persons who have produced evidence that they are the legitimate owners of the goods; that it has taken all necessary measures to prevent its acquisition and trade of goods obtained thought or related to criminal activities, or that fund, promote or cover up criminal activities; and that it has not financed conflict, have not participated in abuse of human rights or money laundering, nor financed terrorism at any point in the supply chain or have directly/indirectly supported non-state armed groups or public or private security forces; that it has received such goods in compliance with the relevant legislation of their country of origin; and that it does not fraudulently misrepresent the origin of gold; that it does not use child labour to carry out any work or service; that it complies with applicable environmental regulation and fulfils all legal provisions regarding protection of environment and sustainable development; that it does not offer, promise or give any undue advantage, and/or bribe whether directly or through intermediaries, to a foreign public official or a private sector employee in order to obtain business or any other advantage; and that in case of a corporate entity customer/beneficial owner, that it complies with OECD'S due diligence and for responsible supply chains of minerals from conflict affected and high risk areas and gold supplement guidance,; have not participated in systematic or wise spread human right abuses with extraction transport or trade of gold direct or indirect support to non-state, armed groups or public or private security forces, bribery and fraudulent misrepresentation of the origin of gold, contribution to conflict, the customer/beneficial owner makes this present declaration on behalf of its shareholders, members of the board, its employees and representatives, and that it undertakes to carry out all of the activities within the scope of this declaration in such a way that its providers, its consultants, customers and other associates, abide by these principles, and that it shall advise **Promise Gold Refinery FZC** of any change to this declaration.

You will remain responsible and accountable for certification and external audit of supplied precious metals to **Promise Gold Refinery FZC**. If any of the foregoing is discovered to be false, customer/beneficiary owner agrees and covenants to indemnify **Promise Gold Refinery FZC** for any direct and indirect loss and damage incurred by it because of the same, upon the first written demand of **Promise Gold Refinery FZC** and that all liability arising there from shall be solely assumed by it.

Declaration of Source of Metal			
Country of Origin			
Type of Gold	Primary		Secondary
Weight /Quantity of metal			
Mode of Transport of Metal from Source of Gold			
Metal Type			

Name	Emirates ID	Contact Number	Signature



## Policy Approval and Sign-Off

This **Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) Policy of Promise Gold Refinery FZC** has been reviewed, verified, and approved for implementation in accordance with the applicable UAE laws and regulations, including:

- Federal Decree-Law No. (20) of 2018 and its amendments
- Cabinet Decision No. (10) of 2019 and subsequent decisions Nos. (16) of 2021, (132) of 2023, and (71) of 2024
- Ministerial Decree No. (68) of 2024 on Responsible Sourcing of Gold
- Relevant FATF Recommendations and Ministry of Economy DNFBP Guidelines

The undersigned confirm that the Policy accurately reflects the Company's compliance framework, risk-based approach, and operational procedures for the prevention of money laundering, terrorist financing, and proliferation financing within the precious-metals and refinery sector.

This Policy becomes effective on the date of approval indicated below and shall remain in force until superseded by a subsequent revision approved by management.

### Approved by:

Name / Position	Signature
<b>James Mohan Chandran</b> Compliance Officer	
<b>Vipin Raj Selvaraj</b> Managing Director	 

**Document Reference:** PGR-AML-CFT Policy Rev 02.0B October 2024

**Effective Date:** 15 October 2024

**Next Scheduled Review:** October 2025

**Approved Version Control:** Rev 02.0B / 2024