

Anti-Money Laundering & Counter-Terrorism Financing Policy (AML/CTF)

Version 1.0 | Effective: January 2025

1. Objective

The AML/CTF Policy establishes the framework under which Global Dot Bank prevents, detects, and reports money laundering, terrorist financing, and other illicit financial activities.

2. Regulatory Basis

GDB complies with:

- FATF Recommendations (2012)
- Bank of Thailand AML Regulations
- U.S. FinCEN Guidelines
- EU 6th AML Directive (6AMLD)
- UN Sanctions & Counter-Terrorism Financing Framework

3. Risk-Based Approach

GDB applies a risk-based approach (RBA) to customer due diligence (CDD), transaction monitoring, and reporting. High-risk customers, sectors, and jurisdictions are subject to enhanced due diligence (EDD).

4. Customer Due Diligence (CDD)

Prior to account opening, GDB verifies:

- Customer identity (KYC)
- Source of funds and wealth
- Beneficial ownership for corporate entities
- Purpose of the account and expected transaction behavior

CDD is refreshed periodically based on customer risk category.

5. Transaction Monitoring

All transactions are continuously screened through automated monitoring systems. Red flags include:

- Structuring or rapid movement of funds
- Transactions inconsistent with known business activity
- Links to sanctioned jurisdictions or persons

6. Reporting Obligations

Suspicious activity reports (SARs) are submitted promptly to relevant authorities (AMLO Thailand, FinCEN USA, etc.) by the appointed Money Laundering Reporting Officer (MLRO).

7. Record Keeping

All CDD and transaction data are retained for a minimum of 7 years from the end of the customer relationship, in accordance with FATF Recommendation 11.

8. Sanctions Compliance

GDB adheres to all applicable UN, OFAC, and EU sanctions lists. Transactions or relationships involving sanctioned entities are immediately terminated and reported.

9. Staff Training

All employees receive AML/CTF training annually. Specialized training is provided to frontline, compliance, and audit personnel.

10. Governance

Oversight rests with the Risk & Compliance Committee, chaired by an Independent Non-Executive Director. Internal Audit performs semi-annual AML audits.

Approved by:

Board of Directors, Global Dot Bank

Date: January 10, 2025