

Document Subject	ANTI-MONEY LAUNDERING & COMBATING THE FINANCING OF TERRORISM (AML/CFT) POLICY
Company name	Fine Gold LLC
Trade license number	643756
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Code	FG/AML
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Contact Details	Compliance@finegold.ae

1. Purpose

This Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) Policy sets out the standards and practices followed by **FINE GOLD LLC (“FINE GOLD”)** to prevent our business from being used for money laundering, terrorism financing, or proliferation financing.

We are committed to protecting the integrity of the precious metals industry and ensuring that all activities surrounding purchasing, refining, and trading metals comply with UAE laws and the highest international standards.

This policy explains the responsibilities of our customers and describes the measures we are taking to check responsible, transparent, and lawful business operations.

2. Scope

This policy applies to:

- ✓ All customers, suppliers, and third-party business partners
- ✓ All transactions, regardless of value or jurisdiction
- ✓ All products and services offered by **FINE GOLD**
- ✓ All onboarding, due diligence, and transactional processes
- ✓ **FINE GOLD** group of Companies

This is primarily a customer-facing policy, but it reflects the core components of **FINE GOLD's** internal compliance framework.

3. Regulatory Framework

FINE GOLD complies with all UAE laws, regulations, and guidance relating to AML/CFT, including:

- ✓ **Federal Decree-Law No. (10) of 2025:** AML/CFT & Proliferation Financing
- ✓ **Cabinet Resolution No. 134 of 2025** is now the governing Executive Regulation.

Cabinet Resolution No.(156) of 2025 (Schedule of Goods Subject to Control and Non-Proliferation) sets out the UAE controls on dual-use goods and proliferation financing. Fine Gold screens all customers and counterparties against proliferation financing indicators under this Resolution. Fine Gold refuses any transaction linked to the financing of controlled goods and, where there are grounds for suspicion, reports the matter to the UAE FIU through GoAML immediately.

- ✓ **Cabinet Resolution No. (71) of 2024:** Administrative Violations and Penalties for DNFBPs under Ministry of Economy Supervision
- ✓ **Cabinet Resolution No. (74) of 2020:** Local Terrorist List & UNSC implementation
- ✓ UAE National AML/CFT/CPF Strategy 2024–2027
- ✓ Ministry of Economy DNFBP Guidelines (2025)
- ✓ FATF Recommendations & international best practices

FINE GOLD also incorporate insights from:

- ✓ The UAE National Risk Assessment (NRA)
- ✓ Typology reports issued by the UAE Financial Intelligence Unit (FIU)

FINE GOLD recognizes that the DPMS sector carries medium–high inherent risk and is therefore committed to greater vigilance and enhanced controls.

FINE GOLD conducts a Business-Wide Risk Assessment every year to evaluate the money laundering, terrorist financing, and proliferation financing risks that may affect our business. This assessment reviews our customers, suppliers, products, services, delivery channels, and geographical exposure.

The results are used to strengthen our controls, update our procedures, and guide all risk-based decisions.

The BWRA is documented, approved by senior management, and kept available for inspection by the Ministry of Economy.

4. What is Money Laundering?

Understanding how money laundering works is essential to preventing criminals from exploiting our business.

The explanation below outlines the stages involved, how illegal funds are disguised, and why these activities pose serious risks to financial systems and society. It provides a clear foundation for recognizing and responding to suspicious behaviour.

Money laundering is the process of making illegal funds appear legitimate. It typically consists of three stages:

1	2	3
Placement	Layering	Integration
Introducing illicit funds into the financial or commercial system.	Conducting complex transactions to obscure the source and ownership of funds.	Reintroducing the funds into the legal economy as seemingly legitimate assets. Money laundering fuels organized crime, corruption, tax evasion, fraud, drug trafficking, and other serious offenses.

5. What is Terrorism Financing?

Terrorism financing involves providing or collecting funds whether from legitimate or illegitimate sources with the intention of supporting terrorist acts or organizations.

The following explanation describes how such funds may be diverted toward harmful purposes and helps customers understand the seriousness of this risk and the importance of strong preventive measures.

Funds may come from:

- ✓ Legitimate businesses
- ✓ Personal donations
- ✓ Crime proceeds
- ✓ Misuse of charities
- ✓ Informal money transfer systems

Terrorism financing is considered a major national security threat and carries severe penalties.

6. Negative Effects of Money Laundering:

- ✓ Money laundering, terrorist financing, and proliferation financing can destabilize communities, economic sectors, and national economies by enabling criminals and terrorist networks to transform illicit proceeds into legitimate money, enabling their destructive activities.
- ✓ Money laundering is a criminal activity that fuels criminal enterprises, increasing the cost of government due to increased law enforcement and healthcare expenses.

This process has devastating economic, security, and social consequences, as it fuels drug dealers, smugglers, terrorists, illegal arms dealers, and corrupt officials. The globalization of the financial services industry and rapid technological advancements have made the financial aspects of crime more complex and harder to track.

- ✓ Money laundering hinders the growth of the private sector by providing products at lower prices than production costs, making it difficult for legitimate activities to compete. Money launderers often use front companies to hide their gains, which can subsidize products and services below market rates. Criminals can also transform productive enterprises into sterile ones to launder funds, reducing overall economic productivity. Laundering money can lead to unpredictable fluctuations in money demand, significant volatility in international capital flows, and significant fluctuations in exchange rates.
- ✓ Strong financial institutions, including banks, non-bank financial institutions, and equity markets, are crucial for economic growth. However, they can also be low-cost vehicles for criminals to launder funds, potentially undermining market stability. Money laundering often correlates with fraudulent activities by employees and can damage the reputation of financial institutions involved in scheming, leading to a loss of trust and goodwill with stakeholders. In worst cases, money laundering may result in bank failures and financial crises.
- ✓ Money laundering reduces tax revenue by making it difficult for the government to collect revenue from underground transactions, leading to higher tax rates than if untaxed proceeds of crime were legitimate. Additionally, corruption increases taxes for public works expenditures.
- ✓ Money laundering has significant socio-economic effects, as it involves the laundering of dirty money from criminal activities into legitimate funds, which is then used to expand existing criminal operations and finance new ones.
- ✓ Laundered money has significant social and political costs, as it can be used to corrupt national institutions, undermine moral fabric, weaken ethical standards, and encourage criminal activity.

FINE GOLD is committed to supporting both domestic and international efforts and initiatives aimed at combating money laundering and the financing of terrorism in addition to implementing such measures as may be deemed necessary, working only with those whose sources of funds can be reasonably established as legitimate and who do not pose any risk to **FINE GOLD's** reputation and the nation.

7. Line of Defenses:

- ✓ **First Line of Defense: Employee Responsibilities**
Employees play a crucial role in identifying and assessing money laundering and terrorism financing risks.
Identification: Employees are responsible for identifying risks associated with customer activities daily.
Policy Adherence: require that policies and procedures are followed as prescribed by **FINE GOLD**
Transaction Monitoring: Identify suspicious transactions/activities and communicate these to the designated compliance officer.
- ✓ **Second Line of Defense: Compliance Officer**
The compliance officer requires that the organization adheres to policies and procedures related to Anti-Money laundering (AML) and counter-terrorism financing (CFT).
Policy Development: Develop and implement compliance policies and procedures.
Training: Provide training to employees in recognizing and reporting suspicious activities/transactions.
Monitoring: Review and evaluate suspicious transactions and assess their risk levels based on established criteria.
Reporting: check proper reporting of suspicious transaction/activities reports (STRs/SARs) to the relevant authorities.
- ✓ **Third Line of Defense: Independent Audit Function**
An independent audit function is essential to evaluate the effectiveness of the implemented AML compliance program.
Effectiveness Evaluation: Assess the effectiveness of the AML compliance program regularly.
Reporting: Provide feedback to the organization's senior management regarding compliance status and areas for improvement.
Recommendations: Suggest improvements to enhance the compliance framework and address identified weaknesses

8. Employee AML Responsibilities (Staff Obligations)

All employees must follow **FINE GOLD's** AML/CFT procedures, attend mandatory compliance training, report any unusual behavior or red flags, and cooperate with the Compliance Officer.

Employees must not disclose any internal reviews or regulatory investigations, as this may constitute tipping-off under UAE law.

9. FINE GOLD's Commitment

FINE GOLD is committed to conducting business responsibly and safeguarding the financial system from misuse.

The principles outlined below reflect our prevent financial crime. They reflect the values that shape our compliance culture.

- ✓ Zero tolerance for financial crime
- ✓ Full cooperation with competent UAE authorities
- ✓ Timely reporting of suspicious activities
- ✓ Transparent and lawful business conduct
- ✓ Protection of our customers, partners, and the industry
- ✓ a compliance culture embedded across operations

10. Customer Due Diligence (CDD)

Customer Due Diligence is a vital part of how we understand the individuals and businesses we work with, and it helps us confirm that their activities are lawful and appropriate.

The following guidance outlines the steps that **FINE GOLD** takes before entering into a business relationship, as well as the information we need to assess a customer's level of risk.

Customer Due Diligence includes:

- ✓ Verification of identity
- ✓ Understanding customer source of funds and wealth
- ✓ Screening against local and international sanctions lists
- ✓ Assessment of risks associated with the customer's profile
- ✓ Collection of corporate documents
- ✓ Beneficial ownership (UBO) identification
- ✓ Purpose and nature of the business relationship

CDD is required for all customers and may vary based on their risk level.

If any difference is identified between the customer's beneficial ownership information and the details available in the official UBO register or other reliable sources, **FINE GOLD** will request clarification from the customer. If the discrepancy is not resolved within a reasonable time, the matter will be reported to the Ministry of Economy through the designated channels, as required under Cabinet Decision No. 109 of 2023.

FINE GOLD will not proceed with or continue a business relationship if the UBO information cannot be verified satisfactorily.

11. Enhanced Due Diligence (EDD)

Some customers or activities present higher risks that require deeper scrutiny.

This section introduces our Enhanced Due Diligence approach, outlining when it applies and how **FINE GOLD** takes additional steps to verify legitimacy, understand source of funds, and protect our operations from misuse.

EDD is applied when customers present a higher risk, including:

- ✓ High-risk countries or jurisdictions
- ✓ Politically Exposed Persons (PEPs)
- ✓ Complex ownership structures
- ✓ Cash-intensive businesses
- ✓ Adverse media or negative reputation
- ✓ Unusual or inconsistent activity

EDD may include:

- ✓ Additional documentation
- ✓ Verification of SOF and SOW
- ✓ Senior management approval
- ✓ Ongoing monitoring of customer transactions
- ✓ More frequent reviews and updates

If a customer is unable or unwilling to provide required information, **FINE GOLD** will not proceed with the relationship.

11.1 Prohibited Relationships:

Under Article 14 of Cabinet Resolution No. 134 of 2025, **FINE GOLD** will not establish or continue any business relationship when customer due diligence cannot be completed or when information is unclear, unreliable, or inconsistent. In such cases, the relationship must be declined or terminated.

Where Fine Gold declines or terminates a business relationship because CDD cannot be completed, the Compliance Officer assesses whether the circumstances raise reasonable suspicion of money laundering, terrorist financing, or proliferation financing. Where they do, Fine Gold files a Suspicious Activity Report with the UAE FIU through GoAML immediately, under Article 11 of Federal Decree-Law No.(10) of 2025.

Fine Gold does not tell the customer that a report has been filed. Under Article 2(3) of Federal Decree-Law No. (10) of 2025, knowledge of ML/TF/PF may be inferred from the factual and objective circumstances of the case. Fine Gold applies this constructive knowledge standard when assessing suspicious activity; a person need not have direct proof of wrongdoing for suspicion to be formed. Under Article 37 of the same law, there is no limitation period for ML/TF/PF offences. Directors and senior managers may face personal criminal liability for offences committed by the company's representatives under their authority.

12. Ongoing Monitoring

Risk management does not end after onboarding.

The information below explains how **FINE GOLD** continuously monitors transactions and customer behaviour to check their activities remain under their profiles. It shows the importance of vigilance throughout the business relationship.

FINE GOLD continuously monitors:

- ✓ Transaction consistency
- ✓ Behavioral patterns
- ✓ Sanctions list updates
- ✓ Ownership changes
- ✓ Geographical risk shifts
- ✓ Unusual customer activity

Transactions must align with the customer's stated profile, financial capacity, and business activities.

13. Screening of Customers and Transactions

Screening helps identify sanctioned individuals, entities, and high-risk associations before they enter our business.

The details below outline when screening is performed and how it supports regulatory compliance, ensuring transactions remain lawful and transparent.

FINE GOLD screens:

- ✓ Names of customers
- ✓ Beneficial owners
- ✓ Representatives and signatories
- ✓ Linked entities and addresses

Screening is performed at:

- ✓ Onboarding
- ✓ Regular intervals (based on risk classification)
- ✓ Upon regulatory updates
- ✓ When unusual behavior is detected

If a match against sanctions lists is identified, appropriate TFS measures are applied under UAE laws.

14. Suspicious Activity Indicators

Certain behaviours or transaction patterns may signal potential financial crime.

The indicators below describe the types of red flags that may raise concern and explain why such activities must be reviewed. It supports early detection and responsible handling of risks.

Customers should be aware that certain activities may trigger internal review, including:

- ✓ Unexplained changes in behavior
- ✓ Structuring transactions to avoid reporting thresholds
- ✓ Large cash transactions (not permitted under our Cash-Free Policy)
- ✓ Third parties making payments on behalf of customers
- ✓ Requests inconsistent with the customer's business profile
- ✓ Transactions involving high-risk jurisdictions
- ✓ Attempts to obscure beneficial ownership
- ✓ Refusal to provide required documentation

These indicators do not imply wrongdoing but may require clarification or escalation.

15. Reporting Suspicious Activity

When suspicious behaviour is identified, timely and confidential reporting is essential.

The process described below explains the steps that must be taken, the responsibilities involved, and the procedures required under UAE law. It reinforces our supporting regulatory efforts.

If suspicious activity is identified, **FINE GOLD** must:

- ✓ Document the concern
- ✓ Escalate to the Compliance Officer
- ✓ Determine whether a Suspicious Transaction/Activity Report (STR/SAR) is required
- ✓ Submit STRs confidentially through the UAE FIU's GOAML platform
- ✓ Submit with not delay DPMSR

FINE GOLD must not, under any circumstances:

- ✓ Inform the customer ("tipping off")
- ✓ Delay submission of required reports
- ✓ Interfere with regulatory investigations

This protects the integrity of both the investigation and the customer relationship.

FINE GOLD maintains an active and updated registration on the UAE FIU's GOAML platform. The Compliance Officer requires that all user details, access permissions, and contact information remain current. The account is monitored daily to require that no notifications or regulatory alerts are missed.

FINE GOLD will not inform any customer or third party of an internal review, regulatory inquiry, or the filing of a Suspicious Transaction or Activity Report. This protects the integrity of investigations and complies with Article (5) and Article (15) of Federal Decree-Law No. 10 of 2025.

16. Customer Responsibilities

Effective AML/CFT processes require cooperation from all customers.

The responsibilities listed below clarify the obligations customers must meet when working with **FINE GOLD**, ensuring that information provided is accurate and that business activities are carried out transparently and lawfully.

To maintain a safe and compliant environment, all customers must:

- ✓ Provide accurate, complete, and truthful information
- ✓ Cooperate with CDD and EDD requirements
- ✓ Notify **FINE GOLD** of changes in ownership or business activities
- ✓ Avoid transactions with sanctioned or high-risk entities
- ✓ Refrain from using third parties to conduct business without approval
- ✓ Submit documentation when requested
- ✓ check their own compliance programs align with applicable laws

Misrepresentation or refusal to cooperate may lead to termination of the business relationship.

17. Prohibited Practices

To protect our business and comply with UAE law, certain practices are not allowed under any circumstances.

The practices outlined below identify activities that **FINE GOLD** will not accept and explains why these actions pose serious compliance and reputational risks.

- ✓ Cash transactions of any amount
- ✓ Anonymous or fictitious accounts
- ✓ Working with shell banks or unlicensed financial institutions
- ✓ Unverified or unverifiable customers
- ✓ Transactions involving high-risk jurisdictions without proper due diligence
- ✓ Dealing with customers who refuse KYC requirements
- ✓ Transactions lacking legitimate purpose or documentation

Violations will result in immediate action.

18. Recordkeeping

FINE GOLD maintains records for a minimum of 10 years, including:

- ✓ KYC documents
- ✓ Transaction records
- ✓ Screening and monitoring logs
- ✓ STR filings
- ✓ Correspondence related to AML/CFT reviews

Records are kept securely and may be shared only with competent authorities.

19. Internal Governance (Customer Overview)

Strong internal governance supports the consistent and effective application of our AML/CFT measures.

This section provides customers with an overview of the structures, roles, and controls in place to manage compliance, maintain oversight, and check regulatory alignment.

Customers should be aware that **FINE GOLD** maintains:

- ✓ A designated Compliance Officer
- ✓ A dedicated Compliance Department
- ✓ Internal risk-based procedures
- ✓ Compliance training for all employees
- ✓ Regular audits of AML/CFT practices
- ✓ A strong internal reporting mechanism

These measures check consistent implementation of all regulatory obligations.

20. Non-Compliance & Consequences

Failure to comply with AML/CFT requirements can lead to significant legal and operational consequences.

FINE GOLD must act when a customer does not meet obligations or appears to be involved in suspicious activity. It reinforces the importance of cooperation and transparency.

- ✓ Reject or terminate the business relationship
- ✓ Decline specific transactions
- ✓ Freeze assets when required
- ✓ File reports with UAE authorities
- ✓ Cooperate with law enforcement investigations

Clear and responsible cooperation is essential for a safe business relationship.

21. Policy Review

This policy is reviewed yearly or sooner if:

- ✓ UAE laws or regulations change
- ✓ The National Risk Assessment issues new findings
- ✓ The Ministry of Economy or FIU releases additional guidance

✓ Internal risk evaluations recommend updates
Customers will be informed when updates materially affect them.

22. Statement of Assurance

FINE GOLD is committed to conducting business in a lawful, ethical, and transparent manner.

FINE GOLD upholds the UAE's global leadership in AML/CFT compliance and work continuously to protect the integrity of the precious metals supply chain.

By partnering with **FINE GOLD**, customers agree to support these efforts and uphold the shared responsibility of a safe and compliant business environment.

23. Fine and Penalties

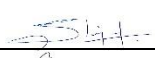
FINE GOLD complies with Federal Decree-Law No. (10) of 2025 and applicable Cabinet Decisions, which empower supervisory authorities to impose penalties for violations of AML/CFT/CPF obligations, including:

- ✓ Written warnings
- ✓ Administrative fines ranging from AED 50,000 to AED 5,000,000 per violation
- ✓ Suspension or restriction of business activities
- ✓ Suspension or removal of responsible individuals
- ✓ Restrictions on owners, directors, or managers
- ✓ Appointment of a temporary supervisor
- ✓ License suspension or full license revocation
- ✓ Public disclosure of penalties as a deterrent

Failure to comply with UAE AML/CFT laws, including providing false information, refusing to cooperate with due diligence, or engaging in any suspicious activity, may lead to criminal penalties, asset freezing, and reporting to the competent authorities.

Any behaviour that may indicate money laundering, terrorism financing, or proliferation financing will be escalated through our internal AML procedures and may result in the submission of a Suspicious Transaction Report through the GOAML platform.

24. Approval and Acknowledgement

Approved By	Shiyad Kattuparambil Abdulkareem Managing Director		
Prepared by	Luisa Fernanda Compliance Officer/MLRO		

Next Review date to be scheduled in February 09, 2026

25. Document Version Control

Version	Date	Summary of Changes
001	2023	Initial issuance.
002	2024	Updates following regulatory review.
003	November 28, 2025	Amendments to align with Federal Decree-Law No.(10) of 2025
005	May 01, 2026	New regulation updates and amendments

COMMUNICATION DETAILS

For questions and/or concerns related to compliance manual, please send an email to compliance@finegold.ae

For anonymous inquiries /concerns/ whistleblowing and grievances, please contact us through email compliance@finegold.ae

Fine Gold LLC

Compliance Department
Al Ras, UAE - Dubai

By signing below, I/we acknowledge that:

- ✓ We have received, read, and understood this policy in its entirety.
- ✓ We agree to comply fully with all requirements, standards, and obligations outlined in this policy.
- ✓ We understand our responsibilities under applicable UAE laws, including:
 - ♦ Federal Decree-Law No. (10) of 2025 on AML/CFT & Proliferation Financing
 - ♦ Cabinet Resolution No. 134 of 2025 (AML/CFT Executive Regulations)
 - ♦ Cabinet Resolution No. (74) of 2020 (Local Terrorist List)
 - ♦ Cabinet Resolution No. (71) of 2024 (Administrative Violations and Penalties for DNFBPs)
 - ♦ Any relevant industry guidelines (OECD, FATF, OECD Due Diligence Guidance, and Cabinet Resolution No. (156) of 2025)
- ✓ We commit to providing accurate and truthful information and to cooperating with all compliance requests, including due diligence, reporting, screening, and monitoring.
- ✓ We understand that violations of this policy may result in consequences including:
 - ♦ Termination of the business relationship
 - ♦ Reporting to competent UAE authorities
 - ♦ Freezing or suspension of transactions
 - ♦ Administrative, civil, or criminal penalties
- ✓ We acknowledge that **Fine Gold LLC** may update this policy as required by law or internal governance, and that we are responsible for complying with the latest version.
- ✓ We understand that **Fine Gold LLC** is available to provide clarification or support regarding the implementation of this policy.

Authorized Signatory:

Name:

Title:

Company:

Date:

Signature: