

GGRS Gulf Gold Refinery Services/T.L.I Global FZE

AML / CFT Policy and Procedures

March, 2018 Issued by GGRS

Introduction and Scope

As with any financial services company, there is a risk that products and services offered by GGRS might be used to launder money and finance terrorism. UAE law and applicable local laws in the jurisdictions in which we operate, requires us to put training, processes and systems in place to identify, manage and mitigate this risk. We do this to protect the Group's reputation, to comply with relevant laws and to be a responsible corporate citizen. Failure to do so may result in social harm, significant penalties, including legal and regulatory action.

Our AML/CFT Policy

Our policy sets out how GGRS complies with its legislative obligations. This applies to all business divisions and employees (permanent, temporary and third-party providers) working for GGRS in UAE and overseas.

Definitions

Money laundering is the process of hiding or disguising the source of illegally obtained ("dirty") funds to make them appear legitimate ("clean"), e.g. by filtering them through the financial system.

Money laundering reduces the risk of detection and confiscation by authorities. It is just as serious as the criminal activity behind it – and preventing it can help reduce crime.

Terrorism financing differs from money laundering in 3 main ways:
Its primary purpose is to disguise the ultimate use of the funds, as opposed to their origin,

It can involve relatively small sums of money, which can have a huge impact in terms of death, destruction and disruption,

Although terrorists may finance their activities through crime, legitimate funds can also be misappropriated to finance terrorism.

Customer Identification

UAE and European AML regulations provide a list of 'designated services'. Before receiving any of these designated services, customers will be required to provide proof of identity or similar documentation.

GGRS is required to collect and verify this information, depending on the type of customer:

Personal - an individual person of any nationality;

A sole trader - a person who trades in their own legal right without the use of a company structure,

incorporation or partners and who, alone, has full liability for the activities of the business;

A domestic company- incorporated in Switzerland, including proprietary, public and listed public companies;

A foreign company incorporated outside UAE;

A partnership - a relationship between persons (the partners) carrying on business in common, under a partnership agreement, with a view to profit;

A trust - a relationship where the trustee holds property or assets for a beneficiary. The trustee can be an individual, a group of individuals or a company;

An association - a group of persons who have agreed to join together in pursuit of one or more common objectives. An association can be incorporated or unincorporated;

A Registered co-operative - a legal entity owned and controlled by the people for whom it was established and who benefit from using its services;

A Government body – this can be a domestic or foreign government body.

Please note that GGRS complies with the National Privacy Principles and DMCC code of obligations.

Suspicion

Money laundering and terrorism financing (ML/TF) are sometimes detected because a customer acts or behaves in a suspicious way. For a 'suspicion' to be valid, we must have reasonable grounds to believe ML/TF activity may be occurring.

To support this, employees receive training in identifying and reporting suspicious matters.

GGRS 5 key AML/CTF principles

1. Comply with AML/CTF legislation in the countries we operate in.
2. Strive to fulfill international standards as detailed in the recommendations of the Financial Action Task Force
3. Work in conjunction with the UAE Government and the governments of the countries we operate in, and support their objectives in relation to the prevention, detection and control of ML/TF.
4. GGRS may decide not to provide products or services based upon decisions guided by ML/TF risk appetite and corporate social responsibility.
5. Maintain and comply with an AML/CTF program, as required by DMCC AML/CTF legislation.

Policy Roles and Responsibilities

GGRS, Directors and Senior Management have ongoing oversight of our AML/CTF policy and procedures. All permanent and temporary employees must comply with these, attend training specific to their role, and report suspicious matters or behaviors.

GGRS AML/CTF Program

The design and implementation of the program was tailored to our ML/TF risk profile, applying specific systems and controls, including:

- ML/TF risk assessment, • Employee training,
- Employee and customer due diligence, • Transaction monitoring.

Monitoring and Reporting

We also may report the following information to either DMCC, regulator or ARIF, the private non-profit association of public utility, whose purpose is to assist in the prevention of and the fight against

Money laundering in relation with the DMCC, UAE Government Federal Act on Combating Money Laundering and Terrorist Financing in the Financial Sector (MLA):

- Transactions with a cash component of USD 100,000 - or more.
- Electronic transfers of funds into or out of UAE

- Any transactions or other activities regarded as suspicious.

For any further question please contact our compliance team info@GGRS.gold