



Anti-Money Laundering (AML) Policy

1. Introduction

This Anti-Money Laundering (AML) Policy outlines the principles and procedures that Aure8 Bullion adheres to in order to prevent and detect money laundering and terrorist financing activities in its gold trading business. This policy is designed to ensure compliance with applicable laws and regulations, uphold ethical standards, and safeguard the Aure8 Bullion's reputation.

2. Purpose

The purpose of this AML Policy is to:

- Establish controls and procedures to prevent the Aure8 Bullion from being used for money laundering or terrorist financing activities.
- Comply with all relevant laws, regulations, and guidelines concerning anti-money laundering and counter-terrorist financing.
- Provide guidance to employees, contractors, and third parties on their responsibilities and obligations under this policy.

3. Scope

This policy applies to all employees, contractors, agents, and third parties acting on behalf of Aure8 Bullion in relation to its gold trading activities. It covers all aspects of the business, including but not limited to customer due diligence, transaction monitoring, and reporting suspicious activities.

4. Regulatory Framework

The regulatory framework for gold trading in Dubai is robust, designed to ensure the integrity of the market and prevent illicit activities such as money laundering and terrorism financing. Some of the key entities we refer to for guidance are:

Dubai Multi Commodities Centre (DMCC)

The DMCC is a key regulatory body overseeing the trading of commodities, including gold, in Dubai. It provides a framework for regulating and facilitating the trading environment, ensuring transparency and adherence to international standards.

UAE Central Bank



The Central Bank of the UAE plays a significant role in regulating financial transactions related to gold trading. It sets policies to combat money laundering and terrorism financing, which gold traders must comply with.

Dubai Gold and Commodities Exchange (DGCX)

The DGCX is a platform for trading gold futures and options. It operates under the regulation of the Securities and Commodities Authority (SCA) and adheres to stringent compliance requirements to maintain market integrity.

Securities and Commodities Authority (SCA)

The SCA is responsible for regulating the securities and commodities markets in the UAE, including gold trading. It ensures that all trading activities are conducted in a fair and transparent manner.

Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) Regulations

Gold traders in Dubai must comply with AML/CFT regulations. These regulations require businesses to implement robust customer due diligence procedures, report suspicious transactions, and maintain accurate records.

Responsible Sourcing

Dubai has implemented responsible sourcing guidelines to ensure that gold traded within its jurisdiction is sourced ethically and sustainably. This includes compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Customs and Import Regulations

The Dubai Customs authority regulates the import and export of gold. Traders must comply with customs declarations, import duties, and other related regulations to prevent smuggling and ensure proper documentation.

Taxation

Gold trading in Dubai is subject to specific tax regulations, including the Value Added Tax (VAT) introduced in January 2018 and Corporate Tax introduced in June 2023. Traders must comply with tax filing and payment requirements as stipulated by the Federal Tax Authority (FTA).

Industry Associations



Various industry associations, such as the Dubai Gold and Jewellery Group (DGJG), play a role in self-regulating the market. They provide guidelines, best practices, and support to gold traders in compliance with regulatory requirements.

Compliance and Enforcement

Regulatory bodies conduct regular audits and inspections to ensure compliance with the laws and regulations. Non-compliance can result in penalties, including fines, suspension of trading licenses, and other legal actions.

Conclusion

The regulatory framework for gold trading in Dubai is comprehensive, aiming to maintain a fair, transparent, and secure market environment. It aligns with international standards and practices to support Dubai's position as a leading global hub for gold trading.

5. Compliance Framework

Aure8 Bullion is committed to maintaining an effective AML/CFT compliance framework that includes:

Designated Compliance Officer: Aure8 Bullion designates a Compliance Officer responsible for overseeing the implementation and enforcement of this AML Policy.
Training and Awareness: All employees undergo regular training on AML/CFT laws, regulations, internal policies and procedures. This training includes topics such as identifying suspicious activities, customer due diligence procedures, and reporting obligations to ensure employees understand and adhere to these requirements.

Customer Due Diligence (CDD): Aure8 Bullion conducts thorough due diligence on all customers to verify their identity, assess their risk profile, and ensure compliance with regulatory requirements.

Transaction Monitoring: We implement systems for monitoring transactions to detect and report suspicious activities promptly.

Record-Keeping: Aure8 Bullion maintains accurate records of customer transactions and due diligence measures as required by law.

Reporting: We have procedures in place for reporting suspicious transactions to the appropriate authorities in accordance with regulatory requirements.



6. Customer Due Diligence (CDD)

Aure8 Bullion applies a risk-based approach to customer due diligence, which includes:

Customer Identification: We gather sufficient information to verify the identity of customers, including their name, address, date of birth, and identification documents such as passports or government-issued IDs, as well as beneficial ownership.

Risk Assessment: We assess the risk associated with each customer based on factors such as their business activities, geographical location, and transaction history to identify and mitigate potential money laundering and terrorist financing risks. We regularly review and adjust controls and procedures based on risk assessment findings and regulatory developments.

Enhanced Due Diligence (EDD): For high-risk customers, transactions, and jurisdictions Aure8 Bullion applies enhanced due diligence measures, which may include additional verification steps and ongoing monitoring. We document the rationale for applying EDD and obtain senior management approval when required.

Politically Exposed Persons (PEPs): Aure8 Bullion conducts enhanced due diligence on customers who are politically exposed persons (PEPs) to mitigate the risk of money laundering or corruption.

7. Transaction Monitoring

Aure8 Bullion monitors customer transactions in real-time to identify and investigate potentially suspicious activities, including:

- Unusual transaction patterns or behaviour inconsistent with the customer's known profile that may indicate money laundering or terrorist financing.
- Transactions involving high-risk jurisdictions or politically exposed persons.
- Large or complex transactions that are not consistent with the customer's normal business activities.

8. Record-Keeping

Aure8 Bullion maintains accurate records of customer transactions and due diligence measures for a minimum period as required by law. Records include:



- Customer identification information and verification documents.
- Transaction records, including the nature and purpose of transactions, and the source of funds.
- Correspondence and communications with customers regarding AML/CFT matters.

9. Reporting Obligations

Aure8 Bullion is committed to fulfilling its reporting obligations under applicable AML/CFT laws and regulations. We promptly report suspicious transactions to the relevant authorities and cooperate fully with law enforcement agencies and regulatory bodies.

10. Compliance Monitoring and Review

Aure8 Bullion has appointed a designated Compliance Officer responsible for overseeing the implementation of this AML Policy. The Compliance Officer role is to regularly review and update the Aure8 Bullion AML/CFT policies and procedures to ensure compliance with changing laws, regulations, and industry best practices. Our Compliance Officer conducts periodic reviews and audits to assess the effectiveness of our AML/CFT program.

11. Sanctions Compliance

Aure8 Bullion is committed to conducting its business in compliance with all applicable laws and regulations, including those related to international sanctions. This Sanctions Compliance Policy outlines our commitment to adhering to the sanctions laws and regulations of the United Arab Emirates (UAE), the United Nations (UN), the European Union (EU), and the United States (US), among other jurisdictions as applicable.

Policy Statement:

Aure8 Bullion will not engage in any business activities that violate international sanctions. We will ensure that our operations, including the trading of gold and other precious metals, are conducted in full compliance with the relevant sanctions' regimes.

Scope:



This policy applies to all employees, officers, directors, agents, contractors, and any other parties acting on behalf of Aure8 Bullion.

Responsibilities:

- **Board of Directors and Senior Management:** Oversee the implementation and enforcement of this policy.
- **Compliance Officer:** Designated as the primary individual responsible for ensuring compliance with sanctions laws and regulations. The Compliance Officer will provide training, conduct risk assessments, and monitor transactions to ensure adherence to this policy.
- **Employees and Associated Parties:** Required to adhere strictly to this policy and report any suspicious activities or potential violations to the Compliance Officer.

Prohibited Activities:

Aure8 Bullion will not:

- Conduct business with individuals, entities, or countries subject to international sanctions.
- Facilitate transactions that involve sanctioned parties or jurisdictions.
- Engage in any activities that would result in the circumvention of sanctions laws.

Penalties for Non-Compliance:

Non-compliance with this policy may result in disciplinary action, including termination of employment or contracts. Additionally, Aure8 Bullion will cooperate fully with regulatory authorities in any investigation of potential sanctions violations.

Conclusion:

Aure8 Bullion is dedicated to upholding the highest standards of compliance with international sanctions. By adhering to this policy, we ensure our commitment to ethical business practices and the protection of our reputation and legal standing.

12. Audit and Review

Aure8 Bullion will conduct regular audits of the AML program to assess its effectiveness and compliance with policies and regulations. We will review and update the AML Policy and procedures in response to audit findings, regulatory changes, and emerging risks.



13. Whistleblowing and Non-Retaliation

Aure8 Bullion will implement a confidential whistleblowing mechanism, enabling employees to report concerns about potential AML violations. We commit to supporting whistleblowers who report concerns in good faith and strictly prohibit any form of retaliation against them.

14. Enforcement and Disciplinary Action

Aure8 Bullion will enforce this AML Policy through disciplinary measures against employees or third parties who violate AML regulations or internal policies. We will cooperate fully with regulatory authorities during investigations and enforcement actions.

15. Conclusion

Aure8 Bullion is committed to maintaining a robust AML/CFT compliance program to prevent money laundering and the financing of terrorism. We strive to uphold the highest standards of integrity and ethical conduct in our business operations and will continue to adapt and improve our practices to meet evolving regulatory requirements.

16. Approval and Implementation

This AML Policy is approved by the Board of Directors of Aure8 Bullion and is effective as of 20 June 2024. All employees, contractors, agents, and third parties must comply with this policy.

Approved by:

A handwritten signature in black ink, appearing to read 'Steve Hawkins', written in a cursive style.

Steve Hawkins
CEO
20 June 2024



Contact Information:

For any questions or further information regarding this policy, please contact our Compliance Officer Tom Davies at tom@aure8.com