

# GOLD BRICK GOLD TRADING LLC

## CASH & CRYPTO PAYMENT SETTLEMENT POLICY

**Version:** 1.0

**Effective Date:** 01/02/2026

**Approved By:** Board of Directors

**Policy Owner:** Money Laundering Reporting Officer (MLRO)

**Review Cycle:** Annual or upon regulatory change

## 1. PURPOSE

This Policy establishes the rules, controls, and approval requirements governing the **acceptance and settlement of payments made in cash or crypto-assets** by or to **Gold Brick Gold Trading LLC (“GBGT”)**.

The objective is to:

- Mitigate **money laundering, terrorist financing, and counter-proliferation financing (CPF)** risks
- Ensure compliance with **UAE AML/CFT/CPF laws, MoE DNFBP guidelines, and EOCN sanctions obligations**
- Align with **FATF standards** and **bank audit expectations**
- Prevent misuse of gold trading activities for illicit value transfer

## 2. SCOPE

This Policy applies to:

- All employees, management, and directors
- All customers and suppliers
- All transactions involving:
  - **Cash payments**
  - **Crypto-asset payments**
- All business activities including purchase, sale, storage, import/export, and logistics of gold

## 3. REGULATORY FRAMEWORK

This Policy is aligned with:

- UAE Federal Decree-Law No. (20) of 2018
- Cabinet Decision No. (10) of 2019
- Cabinet Decision No. (74) of 2020 (TFS & CPF)
- MoE DNFBP / DPMS AML-CFT-CPF Guidelines
- EOCN directives

- FATF Recommendations
- OECD & LBMA gold sector best practices

## 4. POLICY STATEMENT

GBGT adopts a **highly restrictive and risk-based approach** to cash and crypto settlements.

- **Bank transfer is the default and preferred settlement method**
- Cash and crypto transactions are **exceptional**, not routine
- All such transactions require **enhanced controls, approvals, and documentation**

## 5. CASH PAYMENT POLICY

### 5.1 General Rule

- Cash payments are **discouraged**
- Cash is accepted **only where legally permitted and operationally unavoidable**
- Cash transactions are treated as **high-risk**

### 5.2 Cash Thresholds (DNFBP / DPMS)

- Any **single or interrelated cash transaction of AED 55,000 or more** is subject to:
  - Mandatory **Customer Due Diligence (CDD)**
  - Enhanced scrutiny
- Suspicious activity must be escalated **regardless of amount**

### 5.3 Cash Acceptance Conditions

Cash may be accepted **only if all conditions below are met:**

1. Customer is **fully onboarded** with completed CDD

2. No sanctions, PEP, or adverse media concerns
3. Source of Funds (SOF) is clearly documented
4. **MLRO approval obtained prior to acceptance**
5. Transaction is commercially reasonable and consistent with profile

#### **5.4 Prohibited Cash Practices**

GBGT will not:

- Accept cash from third parties unrelated to the customer
- Accept structured or split cash payments to avoid thresholds
- Accept cash involving sanctioned or high-risk jurisdictions
- Accept cash for high-value or recurring transactions without EDD

#### **5.5 Cash Handling & Recordkeeping**

- Cash receipts must be:
  - Counted and verified in presence of two staff members
  - Issued official receipt
  - Deposited promptly into a regulated bank account
- Records retained for **minimum 5 years**

## **6. CRYPTO-ASSET PAYMENT POLICY**

### **6.1 General Position**

GBGT adopts a **very restrictive approach** to crypto-asset settlements due to elevated ML/TF/CPF risks.

- Crypto payments are **not accepted by default**
- Any acceptance is **exception-based** and subject to stringent controls

### **6.2 Conditions for Crypto Acceptance**

Crypto payments may be considered **only if ALL conditions below are satisfied:**

1. Explicit **Board-approved business decision**
2. **MLRO pre-approval** for each transaction
3. Customer classified **Low or Medium risk only**
4. Full **EDD completed**, including:
  - Source of Funds
  - Source of Wealth
  - Crypto wallet ownership verification
5. Use of **regulated Virtual Asset Service Providers (VASPs)** only
6. Blockchain analytics screening completed
7. No involvement of privacy coins or mixers

### **6.3 Prohibited Crypto Practices**

**GBGT will not:**

- Accept crypto from unhosted or anonymous wallets
- Accept privacy-enhancing coins (e.g., Monero, Zcash)
- Accept crypto involving mixers, tumblers, or DeFi protocols
- Accept crypto linked to sanctioned jurisdictions or entities
- Accept crypto for cash-equivalent structuring or layering

### **6.4 Crypto Transaction Controls**

For approved crypto transactions:

- Wallet address must be verified and documented
- Blockchain transaction hash must be recorded
- Conversion to fiat must occur via a **regulated VASP**
- Enhanced monitoring applies post-transaction

## **7. SANCTIONS & CPF CONTROLS**

- All cash and crypto transactions are screened against:
  - UN Consolidated List
  - UAE Local Terrorist List / EOCN updates
- **Immediate freezing without delay** applies where required
- Notifications to EOCN and relevant authorities made within prescribed timelines
- Attempted transactions are treated as reportable events

## 8. INTERNAL ESCALATION & REPORTING

- Staff must file an **Internal Suspicious Report (ISR)** immediately upon suspicion
- The MLRO will assess and file **STRs via goAML without delay** where required
- Strict prohibition on tipping-off applies

## 9. RECORDKEEPING & AUDIT TRAIL

GBGT maintains:

- Detailed transaction records
- Approval logs
- Screening evidence
- Cash receipts and crypto transaction hashes

Records are retained for **at least 5 years** and are retrievable within **48 hours** upon request.

## 10. TRAINING & AWARENESS

- Staff receive specific training on:
  - Cash risks in gold trading
  - Crypto-asset typologies

- Structuring and layering indicators
- Training is refreshed annually

## 11. BREACHES & DISCIPLINARY ACTION

Any breach of this Policy may result in:

- Disciplinary action
- Transaction reversal or refusal
- Regulatory reporting
- Termination of relationships

## 12. POLICY REVIEW

This Policy is reviewed:

- Annually
- Upon regulatory change
- After audit or inspection findings

## APPROVAL

Approved by the Board of Directors of **Gold Brick Gold Trading LLC**

**Name:** MOSES JAYARAJ

**Title:** Director

**Date:** 01/02/2026



**STAMP:** \_\_\_\_\_