



GOLD BRICK GOLD TRADING LLC

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VAT TIN: 100569836800003 | www.goldbrick.ae

AML / CFT / CPF & TARGETED FINANCIAL SANCTIONS COMPLIANCE POLICY & HANDBOOK

Version:	2.0
Effective Date:	07 April 2026
Previous Version:	1.1 (01 February 2026)
Policy Owner:	Moses Jayaraj — MD & MLRO
Next Review:	07 April 2027 or upon regulatory change
Applicability:	All staff, management, directors, contractors

Version 2.0 Update Note: This policy has been updated to align with Federal Decree-Law No. 10 of 2025 and Cabinet Decision No. 134 of 2025, in response to the MoET Letter of Concern dated 31 December 2025 (received 24 March 2026). All sections have been reviewed and enhanced accordingly. Version 2.0 (revised April 2026) additionally incorporates: EOCN TFS Guidance July 2025; Circular No. 4 of 2025 (UAE 2024 NRA); Circular No. 8 of 2025 (High-Risk Countries); a dedicated Counter-Proliferation Financing (CPF) section; OFAC SDN and EU Consolidated List screening requirements; and DPMSR reporting threshold clarifications per Cabinet Decision No. 134 of 2025.

1. PURPOSE & SCOPE

1.1 Purpose

This handbook establishes a comprehensive AML/CFT/TFS/CPF framework for Gold Brick Gold Trading LLC (GBGT) to:

- Prevent, detect, and report money laundering, terrorist financing, counter-proliferation financing, and breaches of targeted financial sanctions arising from gold trading activities.
- Align with Federal Decree-Law No. 10 of 2025 Regarding Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation Financing, Cabinet Decision No. 134 of 2025 (Executive Regulations), Cabinet Resolution No. 71 of 2024, Cabinet Resolution No. 74 of 2020, FATF standards, UN sanctions regimes, EOCN directives, MoE DNFBP rules, and OECD Responsible Gold Supply Chain guidance.
- Establish clear procedures for customer, supplier, and transaction risk management.
- Protect the reputation, licences, and assets of Gold Brick Gold Trading LLC.

1.2 Scope

This policy applies to:

- All employees, directors, shareholders, agents, and contractors
- All business activities including purchase, sale, import/export, storage, logistics, and financing of gold
- All customers, suppliers, intermediaries, transporters, refiners, and financial counterparties

1.3 DNFBP Classification

Gold Brick Gold Trading LLC is classified as a Designated Non-Financial Business or Profession (DNFBP) under UAE law, operating as a Dealer in Precious Metals and Precious Stones (DPMS). GBGT applies AML/CFT/CPF/TFS obligations to all business relationships and occasional transactions involving cash or interrelated transactions of AED 55,000 or more.

2. REGULATORY & LEGAL FRAMEWORK

2.1 Primary UAE Legislation — Updated 2025

Version 2.0 Update: Legal references updated from Federal Decree-Law No. 20 of 2018 to the superseding Federal Decree-Law No. 10 of 2025 and Cabinet Decision No. 134 of 2025.

- Federal Decree-Law No. 10 of 2025 Regarding Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation Financing (primary AML/CFT law)
- Cabinet Decision No. 134 of 2025 on the Executive Regulations of Federal Decree-Law No. 10 of 2025 (implementing regulations governing CDD, EDD, reporting obligations)
- Cabinet Resolution No. 71 of 2024 on Regulating Violations and Administrative Penalties Imposed on Violators of AML/CFT/Proliferation Financing Procedures
- Cabinet Resolution No. 74 of 2020 Regulating the Terrorist Lists and Implementing UN Security Council Resolutions on Prevention and Suppression of Terrorism and its Financing
- Ministry of Economy (MoE) DNFBP Guidelines
- UAE Financial Intelligence Unit (FIU) — goAML obligations

2.2 Sanctions & Non-Proliferation

- United Nations Security Council Resolutions (Consolidated Sanctions List)
- UAE Local Terrorist List (updated via EOCN notification system)

- Executive Office for Control & Non-Proliferation (EOCN) — guidelines, circulars, and notifications
- EOCN Guidance on Targeted Financial Sanctions for Financial Institutions, DNFBPs and VASPs — July 2025 (latest update: enhanced procedural requirements for screening, freezing, and reporting)
- Circular No. 4 of 2025 — Understanding the Importance of the UAE 2024 National Risk Assessment (NRA). The DPMS sector is identified in the NRA as carrying one of the highest inherent ML/TF vulnerabilities. Gold Brick Gold Trading LLC applies this risk context to its EWRA and CDD risk classifications.
- Circular No. 8 of 2025 — Updating the Lists of High-Risk Countries, Countries Subject to Increased Monitoring, and Related Measures. All counterparties and transactions linked to high-risk jurisdictions per this Circular are subject to enhanced scrutiny.

2.3 International Standards

- FATF Recommendations (40 Recommendations + Guidance for DNFBPs)
- OECD Due Diligence Guidance for Responsible Supply Chains of Gold

3. GOVERNANCE, OVERSIGHT & ROLES

3.1 Senior Management / Board

- Approves AML/CFT policy and risk appetite
- Ensures adequate resources and independence of Compliance
- Reviews EWRA and compliance reports annually
- Approves high-risk customer relationships
- Ensures remediation of audit findings; and ensures that an independent review of the AML/CFT compliance framework is conducted at least annually per FATF Recommendation 18 and UAE 2025 DNFBP Guidelines, with findings documented and remediated within agreed timescales

3.2 Money Laundering Reporting Officer (MLRO)

The designated MLRO for Gold Brick Gold Trading LLC is Moses Jayaraj, Managing Director & Ultimate Beneficial Owner. The MLRO:

- Owns AML/CFT/TFS/CPF programme; maintains EWRA; approves onboarding per authority matrix
- Reviews Internal Suspicious Reports (ISRs) and files STRs via goAML (registered under moses@goldbrick.ae)
- Handles sanctions TFS freezing and EOCN reporting including FFR and PMNR submissions
- Liaises with FIU, MoE, EOCN, and other competent authorities
- Maintains confidential ISR, STR, and sanctions registers
- Has direct and unrestricted access to Senior Management and operates independently of business lines

3.3 All Staff

- Complete mandatory training within 30 days of joining and annually thereafter
- Adhere to all AML/CFT procedures; never tip-off customers or counterparties
- Report suspicions immediately via Internal Suspicious Report (ISR) to the MLRO

4. ENTERPRISE-WIDE RISK ASSESSMENT (EWRA)

4.1 Objectives

Identify and evaluate inherent ML/TF/CPF/TFS risks; assess control strength; determine residual risk and risk appetite alignment.

4.2 Risk Factors & Weighting

Risk Factor	Indicative Weight
Customer (type, cash-intensity, UBO opacity, PEP ties)	25%
Geography (origin, transit, destination, sanctions/weak AML regimes)	25%
Product/Service (bullion vs scrap; hand-carry; third-party payments)	20%
Sanctions/CPF Exposure (list proximity, dual-use risk)	20%
Delivery Channel (non-face-to-face, introducers)	10%

4.3 Scoring & Frequency

- 1-5 scale per factor. Thresholds: Low (5-9) / Medium (10-14) / High (15-25).
- Annual formal EWRA; event-driven updates for market/route/product changes, sanctions updates, adverse media, audit findings.
- Outputs: Company Risk Register; mitigating controls matrix; Board approval minutes. Evidence retained minimum 5 years.

5. SANCTIONS SCREENING

Version 2.0 Update: Explicit EOCN notification monitoring and documented screening procedures added in response to MoET deficiency findings.

5.1 EOCN Notification System

- Gold Brick Gold Trading LLC is subscribed to the EOCN notification system under moses@goldbrick.ae (updated from mosesjrj@gmail.com effective April 2026).
- The MLRO actively monitors all EOCN notifications upon receipt and ensures prompt action on any sanctions list updates.
- All EOCN notifications are saved, logged with date received, and actioned within 24 hours.

5.2 Screening Obligations

All of the following must be screened at onboarding and on an ongoing basis:

- All customers and prospective customers
- All beneficial owners (UBOs) holding 25% or more, or exercising control
- All authorised signatories
- All suppliers and trading counterparties

- All intermediaries, agents, and introducers

5.3 Lists to Screen Against

- UAE Local Terrorist List (published and updated by EOCN)
- United Nations Security Council Consolidated Sanctions List
- PEP (Politically Exposed Persons) — domestic, foreign, and international organisation PEPs and their relatives and close associates (RCAs)
- Adverse media sources — global and regional
- OFAC SDN List (US Office of Foreign Assets Control) — Specially Designated Nationals and Blocked Persons List
- EU Consolidated Sanctions List — European Union Consolidated Financial Sanctions List

5.4 Screening Process

1. Pre-onboarding: Mandatory screen before any business relationship is established or transaction executed.
2. Ongoing: Re-screen all active counterparties upon each EOCN notification update and prior to each material transaction for medium/high risk clients.
3. Documentation: Save and retain screening results including date, tool used, analyst name, and outcome for every screen conducted. Retain for minimum 5 years.
4. Partial Name Match: Where a partial match is identified, conduct secondary checks (DOB, nationality, ID number, alias) and document rationale. File PMNR where required (see Section 12).
5. Confirmed Match: Immediate freeze. File FFR (see Section 9.1). Escalate to MLRO and notify EOCN without delay (same business day where practicable, in line with Cabinet Resolution No. 74 of 2020 and EOCN TFS Guidance July 2025).

6. CUSTOMER DUE DILIGENCE (CDD)

Version 2.0 Update: CDD/EDD procedures updated to align with Cabinet Decision No. 134 of 2025. Risk-based customer classification framework formalised.

6.1 Minimum CDD — Individuals

- Full legal name, date of birth, nationality
- Valid passport and/or Emirates ID / National ID (certified copy)
- Proof of address (utility bill or bank statement — last 3 months)
- Contact details (phone, email)
- Occupation/employer; expected transaction volume and frequency; declaration of source of funds

6.2 Minimum CDD — Legal Entities

- Legal name and registration number; trade licence
- Certificate of Incorporation; Memorandum & Articles of Association
- List of directors and authorised signatories with ID verification
- UBO identification: natural persons owning 25% or more or exercising control through other means (voting rights, veto rights, shareholder agreements, or senior management control even below 25%)
- Ownership chain charts mandatory for entities with two or more layers

- Nature of business; expected turnover and transaction profile

6.3 Risk-Based Customer Classification

Per Cabinet Decision No. 134 of 2025, each customer shall be classified upon onboarding and reviewed periodically:

Risk Level	CDD Required	Review Frequency
LOW	Standard CDD — core KYC documents, basic screening	Every 36 months
MEDIUM	Standard CDD + enhanced transaction monitoring	Every 24 months
HIGH	Full EDD — SOF, SOW, senior approval, site visit if required	Every 12 months or sooner

6.4 Risk Factors for Classification

- Customer type: individual, corporate, DNFBP, financial institution
- Jurisdiction: FATF greylist/blacklist country, sanctions-exposed geography
- Transaction profile: cash intensity, transaction size, frequency
- Ownership structure: complex, opaque, offshore, nominee
- PEP status: any PEP connection triggers automatic HIGH risk
- Adverse media: negative findings trigger escalation
- Sector: gold sourcing from conflict-affected or high-risk areas

6.5 Ongoing Monitoring

- Transactions to be monitored for conformity with expected profile. Material deviations must be investigated.
- CDD documents must be refreshed at each periodic review date or upon trigger event.
- CDD also applies to occasional/one-off transactions of AED 55,000 or above, or where suspicion exists regardless of amount.
- All CDD records retained for minimum 5 years from relationship termination.

7. ENHANCED DUE DILIGENCE (EDD)

7.1 Triggers for EDD

- Customer classified as HIGH risk per Section 6.3
- Customer is a PEP or associated with a PEP
- Customer is from a FATF high-risk or greylisted jurisdiction
- Large, unusual, or structurally complex transactions
- Complex ownership structure (offshore trusts, bearer shares, nominee arrangements)
- Adverse media indicating criminality or serious reputational risk
- Any transaction where the source of funds cannot be clearly established

7.2 EDD Steps

6. Senior Management approval: No HIGH risk relationship to be onboarded without written MLRO and Senior Management sign-off.

7. Source of Funds (SOF): Invoices, bank statements (last 12 months), sale/purchase contracts.
8. Source of Wealth (SOW): Audited financials, tax returns, sale of assets documentation, corporate minutes.
9. Independent checks: Additional public records, registry checks, bank confirmation letters.
10. Site verification: On-site inspection or third-party verification service for suppliers or high-value customers.
11. Transaction restrictions: Set lower transaction limits and require MLRO pre-approval for each trade.
12. Enhanced monitoring: Monthly or real-time transaction monitoring.
13. Document decision: Save all approvals, evidence, and ongoing monitoring plan in the KYC file.

7.3 Periodic EDD Review

EDD revalidation at least every 6-12 months for HIGH risk clients, or sooner upon adverse development, sanctions update, or trigger event.

8. SAR/STR REPORTING — INTERNAL SUSPICIOUS REPORTS & goAML FILING

Version 2.0 Update: goAML registration updated to official corporate email moses@goldbrick.ae. Red flag documentation and staff training procedures formalised.

8.1 goAML Registration

- Gold Brick Gold Trading LLC is registered on the goAML platform under official corporate email: moses@goldbrick.ae (updated from mosesjrj@gmail.com effective April 2026).
- Regular DPMSR (Dealers in Precious Metals and Stones Report) submissions are conducted on an ongoing basis.
- goAML account is maintained by the MLRO and access credentials are securely stored.

8.2 Red Flag Indicators — Documented

The following red flags must be identified, monitored, and reported via ISR to the MLRO:

- High-value cash purchases inconsistent with the customer's known profile
- Structuring: splitting a large transaction into multiple smaller transactions to avoid reporting thresholds
- Multiple transactions with different counterparties sharing a common UBO
- Third-party or unrelated payments for gold purchases without clear commercial rationale
- Rapid resale of gold in a different jurisdiction with an unusual margin
- Inconsistent, falsified, or missing assay certificates or chain-of-custody documents
- No logical commercial rationale for routing, transshipment, or re-export
- Refusal to provide supplier or origin documentation
- Frequent last-minute changes to shipping instructions or destination
- Use of shell companies, nominee directors, or opaque ownership structures
- Payments to or from banks in jurisdictions under heavy sanctions or with weak AML controls
- Customer reluctance to provide KYC documents or source of funds information

- Transactions inconsistent with the customer's stated business activity

8.3 Internal Suspicious Report (ISR) — Staff Procedure

14. Any staff member who identifies a red flag must file an ISR immediately, within the same business day (maximum 24 hours).
15. ISR must include: reporter name and department; customer/supplier name; transaction dates, amounts, and currencies; narrative explaining the suspicion; supporting documents attached.
16. ISR to be submitted securely to the MLRO via encrypted email or sealed hand-delivery, marked CONFIDENTIAL.
17. MLRO acknowledges receipt and logs ISR in the confidential ISR register.
18. MLRO triages within 24 hours: requests additional information or escalates to investigation.
19. Reporter identity is protected at all times. Anti-retaliation policy applies.

8.4 STR Filing — MLRO Process & goAML Checklist

- An STR shall be filed without delay once reasonable grounds for suspicion are established.
- STR preparation: consolidate ISR evidence; compile analytical narrative; list all parties; provide full transaction trail; attach all supporting documents (IDs, invoices, assay certs, SWIFT, BL, emails).
- Submit via goAML portal using company registered account (moses@goldbrick.ae). Include maximum detail; mark confidentiality reference.
- Post-STR: ongoing monitoring; cooperate with FIU requests; preserve all evidence; hold transactions per FIU/EOCN instruction.
- Retain STR and all supporting documents for minimum 5 years from filing date.
- NEVER inform the customer or any third party of suspicion or STR filing — tipping off is a criminal offence under UAE law.
- Suspicious attempted transactions — including declined, blocked, or abandoned — are also subject to ISR and STR obligations.

9. REGULATORY REPORTING — FFR, PMNR & TFS REPORTING

Version 2.0 Update: Funds Freeze Report (FFR) and Partial Name Match Report (PMNR) procedures explicitly documented as required by the MoET Letter of Concern.

9.1 Funds Freeze Report (FFR)

Upon a confirmed match with any sanctions list:

20. Implement immediate freeze of all funds, assets, goods, or economic resources owned or controlled (directly or indirectly) by the designated person or entity — within 24 hours of confirmation.
21. Isolate and segregate the frozen funds/goods; prevent any release or transfer.
22. File a Funds Freeze Report (FFR) via EOCN without delay. FFR must include: entity details; date and time of freeze action; nature and value of assets frozen; list of all persons involved.
23. Notify the MLRO and competent supervisory authority (MoET/EOCN) without delay upon the freeze action — same business day where practicable. Delay in notification is not permissible under Cabinet Resolution No. 74 of 2020 and EOCN TFS Guidance July 2025.
24. Maintain a full audit trail: freeze instruction, persons who executed it, timestamps, and all supporting evidence.

25. Do not release or unfreeze assets without express clearance from EOCN or relevant authority.

9.2 Partial Name Match Report (PMNR)

Upon a potential or partial match with any sanctions list:

26. Immediately pause the transaction or onboarding process.
27. Conduct secondary verification: cross-reference date of birth, nationality, ID number, aliases, and transliterations.
28. Document all secondary checks and findings in the sanctions screening log.
29. If match cannot be excluded: file a Partial Name Match Report (PMNR) via EOCN.
30. If match is excluded after secondary checks: document the rationale clearly in the KYC file and retain all evidence.
31. PMNR must be filed before resuming the transaction or relationship.

9.3 Documentation of TFS Reporting Actions

- All freeze actions, FFR filings, and PMNR submissions must be recorded in the Sanctions Freeze Log. The log must include at minimum the following fields: (i) date and time of match identification; (ii) counterparty name and ID; (iii) sanctions list matched; (iv) action taken (freeze / decline / secondary check); (v) date and reference number of FFR or PMNR filed with EOCN; (vi) EOCN response reference; (vii) outcome and date of resolution. Where no action is taken after secondary checks, the rationale must be documented in full.
- Log must include: date of match identification; counterparty details; list matched; action taken; date of FFR/PMNR filing; EOCN reference number; outcome.
- All internal decisions relating to TFS reporting — including decisions not to freeze after secondary checks — must be documented with full rationale and retained for minimum 5 years.

9.4 DPMSR — Dealers in Precious Metals and Stones Report

- DPMSR filings are submitted via goAML as required by Cabinet Decision No. 134 of 2025. A DPMSR is required when Gold Brick Gold Trading LLC is involved in any of the following: (i) cash transactions amounting to AED 55,000 or more with resident or non-resident individuals; (ii) cash transactions with corporate entities amounting to AED 55,000 or more; (iii) international wire transfers of AED 55,000 or more (including those executed through exchange houses). DPMSR filings are made promptly upon meeting these thresholds. Where no reportable transactions occur in a period, the MLRO reviews and confirms nil status.
- MLRO to maintain a log of all DPMSR submissions including date, period covered, and goAML reference.

9.5 Counter-Proliferation Financing (CPF) — Controls & Obligations

Version 2.0 Addition: A dedicated CPF section has been added in response to the explicit inclusion of Proliferation Financing in Federal Decree-Law No. 10 of 2025 and FATF Recommendation 7.

Gold Brick Gold Trading LLC, as a physical wholesale gold dealer, recognises that precious metals represent a potential vehicle for proliferation financing (CPF) due to their high value, portability, and liquidity. The following controls apply:

- CPF Risk Indicators for Gold Trading: Transactions involving jurisdictions or parties subject to UN proliferation-related sanctions regimes (UNSCR 1718 — DPRK; UNSCR 2231 — Iran); unusual interest in specific gold purities, weights, or forms that may indicate non-

commercial use; buyers unwilling to disclose end-use or ultimate destination; routing through high-risk jurisdictions with weak export controls.

- Dual-Use Awareness: All significant transactions are assessed for potential dual-use concern. Where gold may be directed toward non-commercial end-use or onward export to sanctioned jurisdictions, MLRO review is mandatory prior to execution.
- Sanctions Screening for CPF: All counterparties are screened against the UN Consolidated List (which includes proliferation-related listings under UNSCR 1718 and 2231) and OFAC SDN List at onboarding and periodically. Confirmed matches trigger immediate freeze and FFR per Section 9.1.
- CPF Reporting: Where a CPF concern is identified, the MLRO files an STR via goAML with specific reference to proliferation financing. The ISR (Section 8.3) process applies in full.
- Training: All staff receive annual CPF awareness training as part of the TFS training programme (Section 11), covering UN sanctions regimes, dual-use indicators, and CPF red flags for the gold sector.

All CPF-related screening records, decisions, and reports are retained for a minimum of five (5) years.

10. EOCN COMPLIANCE

10.1 Registration & Access

- Gold Brick Gold Trading LLC maintains an active EOCN subscription under official corporate email moses@goldbrick.ae (updated April 2026).
- MLRO is the designated contact for all EOCN correspondence.

10.2 Notification Monitoring

- All EOCN notifications are monitored upon receipt and logged.
- Any sanctions list update is actioned within 24 hours — all active counterparties are re-screened against updated lists.
- EOCN nil reports filed if required by instruction.

10.3 Freeze Reporting

- Use EOCN prescribed format for FFR submissions; include immediate action logs with timestamps and persons involved.
- Maintain open communications with EOCN during any active investigation.

11. TFS TRAINING & STAFF AWARENESS

Version 2.0 Update: Formal TFS training programme with attendance records and training materials implemented as required by the MoET Letter of Concern.

11.1 Training Programme

Training Type	Audience	Frequency
AML/CFT Induction	All new staff	Within 30 days of joining
Annual AML/CFT Refresher	All staff	Annually — every 12 months
TFS / Sanctions Training	All staff	Annually with induction for new hires
Role-based: Front Office / Procurement	Customer-facing staff	Annually + on regulatory change
Role-based: Finance / Payments	Finance team	Annually + on regulatory change
Red Flag & ISR Scenario Training	All staff	Annually (scenario-based exercises)
CPF / Dual-Use Goods Awareness	Procurement, logistics	Annually

11.2 Training Content — TFS Module (Mandatory)

- Overview of UAE TFS obligations under Federal Decree-Law No. 10 of 2025 and Cabinet Decision No. 134 of 2025
- How to screen against UAE Local Terrorist List and UN Consolidated Sanctions List
- How to identify confirmed matches and partial matches
- How to freeze assets immediately upon confirmed match
- How to file a Funds Freeze Report (FFR) via EOCN
- How to file a Partial Name Match Report (PMNR)
- Tipping-off prohibition and consequences under UAE law
- How to file an Internal Suspicious Report (ISR)
- Penalties for non-compliance under Cabinet Resolution No. 71 of 2024

11.3 Attendance & Record Keeping

- Attendance logs must be maintained for every training session: date, topics covered, trainer name, names and signatures of all attendees.
- Training materials (presentations, handouts, test results) must be retained for minimum 5 years.
- MLRO maintains a Training Register recording all staff training completions.
- Non-attendance must be documented with reason and makeup session scheduled within 30 days.

12. SUPPLIER DUE DILIGENCE (OECD-ALIGNED)

12.1 Purpose

Prevent intake of conflict, illicit, or sanction-tainted gold and ensure responsible sourcing in alignment with OECD Due Diligence Guidance for Responsible Supply Chains of Gold.

12.2 Supplier KYC Requirements

- Company registration and trade licences
- UBO and director identification and verification
- Chain-of-custody documents (mine of origin, refiner assay certificates, export permits, customs declarations)
- Transport routes and carrier verification
- Payment terms — any cash involvement must be escalated
- Sanctions/PEP/adverse media screening
- ESG policy and grievance mechanism

12.3 Sanctions Screening of Suppliers

- All suppliers and their UBOs/directors screened against UAE Local Terrorist List, UN Consolidated Sanctions List, and PEP lists prior to onboarding and on an ongoing basis.
- Screening results documented and retained in the supplier due diligence file.

13. TRANSACTION MONITORING & GOLD-SPECIFIC RED FLAGS

13.1 Monitoring Focus

Value/weight anomalies, frequency, remitters/beneficiaries, payment methods, routing, and unusual discounting or premium patterns.

13.2 Trade-Based ML Controls

- Spot price vs invoice price reasonableness checks
- Weight, purity, and assay vs invoice reconciliation
- Shipment route logic review
- Split shipment and split payment detection
- Third-party payment prohibition (exceptions only with MLRO written approval)
- Buy-back or circular trading detection

14. RECORD KEEPING, RETENTION & DATA PROTECTION

14.1 Records to Maintain

- Full KYC/CDD files and UBO documentation
- EDD evidence and approval sign-offs
- Supplier due diligence files
- Transaction records
- Sanctions screening logs (with dates, tools, analyst, outcome)
- ISR and STR filings and supporting documents
- Sanctions freeze logs (FFR and PMNR submissions)
- EOCN notification logs and action records

- DPMSR submission logs
- Training registers and attendance logs

14.2 Retention Period

- Minimum 5 years from relationship termination or date of transaction.
- FIU investigations: retain until formally notified that retention is no longer required.
- All records must be retrievable within 48 hours upon request by regulators or competent authorities.

14.3 Security

- Encrypted storage and role-based access controls.
- Audit trails maintained for all access to compliance records.
- Compliance with UAE data protection requirements.

15. EXIT, REFUSAL & DE-RISKING POLICY

15.1 Grounds to Refuse / Exit

- Confirmed sanctions or CPF involvement
- Unresolved adverse media or credible evidence of criminality
- Failure or refusal to provide UBO, SOF, or SOW documentation
- Unacceptable audit findings from supplier or inability to remediate
- Persistent suspicious activity that cannot be satisfactorily explained

15.2 Exit Procedure

- Stop transactions; freeze assets if required
- Notify operations and logistics to hold any pending shipments
- Document exit rationale in the KYC file
- Notify relevant authorities if exit is linked to ML/TF/CPF/TFS suspicion
- MLRO to assess whether STR or sanctions report is required prior to or concurrent with exit
- Apply secure data retention requirements

16. DISCLAIMER

This AML/CFT/CPF/TFS Policy has been developed by Gold Brick Gold Trading LLC for internal governance and compliance purposes only. It is intended to outline the company's internal controls, procedures, and risk-based framework designed to comply with applicable UAE AML/CFT/CPF laws, Ministry of Economy DNFBP guidelines, EOCN directives, and FATF recommendations. It does not constitute legal, regulatory, financial, or tax advice and should not be relied upon as a substitute for professional legal or regulatory guidance.

This policy is based on laws and regulations in force as at April 2026 and may require updates to reflect future legislative or regulatory changes. In the event of any inconsistency between this policy and applicable UAE laws, regulations, or official guidance, the applicable laws and regulatory requirements shall prevail.

17. DOCUMENT CONTROL & SIGN-OFF

Policy Owner	Moses Jayaraj
Title	Managing Director & MLRO
Version	2.0
Effective Date	07 April 2026
Previous Version	1.1 — 01 February 2026
Next Review Date	07 April 2027 or upon regulatory change
goAML Registration	moses@goldbrick.ae
EOCN Subscription	moses@goldbrick.ae
DET Licence	806677
AML Registration	GMLMOEC467872254

MLRO

Gold Brick Gold Trading LLC

Date: 07 April 2026

Company Stamp:



ANNEX I. ENTERPRISE-WIDE RISK ASSESSMENT (EWRA) — SAMPLE SCORING SHEET

Purpose: Operationalises Section 4 of AML/CFT Policy V2.0. Complete annually and upon any material change to business activities, customer base, supply routes, or the regulatory environment. All fields must be completed and signed. Retain for minimum 5 years. Board approval is required where residual risk is assessed as HIGH.

Part A — Inherent Risk Scoring

Score each factor 1 (lowest) to 5 (highest). Multiply by weight to obtain the weighted score.

Reference: EWRA-GBGT-____-____ | Date: _____ | Period: _____

Risk Factor	Weight	Score (1–5)	Weighted Score	Evidence / Justification
Customer Risk	25%	_____	_____	Customer type, cash intensity, UBO opacity, PEP connection, complex ownership structure
Geography	25%	_____	_____	Origin/transit/destination country; FATF greylist/blacklist status; sanctions-exposed jurisdiction
Product / Service	20%	_____	_____	Bullion vs scrap/doré; hand-carry; third-party payments; unusual purity or form requests
Sanctions / CPF Exposure	20%	_____	_____	Proximity to listed parties; dual-use indicators; UN DPRK/Iran regime links (UNSCR 1718/2231)
Delivery Channel	10%	_____	_____	Non-face-to-face onboarding; indirect counterparties; introducers; online-only relationships
TOTAL INHERENT RISK SCORE		_____	_____/25	Low: 5–9 Medium: 10–14 High: 15–25

Part B — Control Effectiveness & Residual Risk

Assessment Field	Rating	Notes / Basis
Inherent Risk Rating	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High	Based on total inherent score above
Control Effectiveness	<input type="checkbox"/> Strong <input type="checkbox"/> Adequate <input type="checkbox"/> Weak	Policy quality, training, monitoring frequency, audit findings
Residual Risk Rating	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High	Inherent risk adjusted for control effectiveness
Within Risk Appetite?	<input type="checkbox"/> Yes <input type="checkbox"/> No — Escalate	If No: escalate to Senior Management and document mitigating actions

Next EWRA Review Date	_____	<i>Annual minimum; or upon material change, regulatory update, or audit finding</i>
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Part C — Sign-Off & Authorisation

MLRO must sign. Senior Management approval required. Board approval required if residual risk is HIGH.

Role	Name	Signature & Date
Completed by (MLRO)	Moses Jayaraj	
Approved by (Senior Management)		
Board Approval (HIGH residual risk)		

ANNEX II. KYC / CDD CHECKLIST TEMPLATES

Purpose: Operationalises Sections 6 and 7 of AML/CFT Policy V2.0. Complete a separate checklist for each customer, supplier, UBO, or counterparty at onboarding. Retain completed checklists in the KYC file for minimum 5 years. A tick (✓) confirms the item is satisfied and the document is on file.

Part A — Individual / UBO Checklist

Name: _____ Relationship: Buyer Supplier UBO Director Other:

KYC Reference: _____ Onboarding Date: _____ Counterparty Ref: _____

Requirement	✓	Reference / Document No.	Expiry / Notes
Full legal name confirmed (matches ID document exactly)	<input type="checkbox"/>		
Date of birth confirmed	<input type="checkbox"/>		
Nationality confirmed	<input type="checkbox"/>		
Valid passport — certified copy obtained	<input type="checkbox"/>	Passport No: _____	Expiry: _____
Emirates ID / National ID — certified copy (where applicable)	<input type="checkbox"/>	ID No: _____	Expiry: _____
Proof of address — utility bill or bank statement (last 3 months)	<input type="checkbox"/>	Document type: _____	
Contact details recorded (phone and email)	<input type="checkbox"/>		
Occupation / employer declared	<input type="checkbox"/>		
Source of funds — declaration obtained and documented	<input type="checkbox"/>		
Expected transaction volume and frequency declared	<input type="checkbox"/>		
Sanctions screen — UAE Local Terrorist List	<input type="checkbox"/>	Date: _____	Result: CLEAR / MATCH
Sanctions screen — UN UNSC Consolidated List	<input type="checkbox"/>	Date: _____	Result: CLEAR / MATCH
Sanctions screen — OFAC SDN List	<input type="checkbox"/>	Date: _____	Result: CLEAR / MATCH
Sanctions screen — EU Consolidated List	<input type="checkbox"/>	Date: _____	Result: CLEAR / MATCH

PEP check completed	<input type="checkbox"/>	Date: _____	Result: PEP / NOT PEP
Adverse media check completed	<input type="checkbox"/>	Date: _____	Result: CLEAR / FLAGGED

Field	Value	CDD Level	Next Review Date
Risk Rating	<input type="checkbox"/> LOW <input type="checkbox"/> MEDIUM <input type="checkbox"/> HIGH	<input type="checkbox"/> Standard CDD <input type="checkbox"/> EDD	LOW: 36m MEDIUM: 24m HIGH: 12m
EDD Senior Approval (HIGH risk only)	<input type="checkbox"/> N/A <input type="checkbox"/> Approved	Approved by: _____	Date: _____
Completed by (Analyst)		Date: _____	Signature: _____
Reviewed and approved by MLRO	Moses Jayaraj	Date: _____	Signature: _____

Part B — Legal Entity Checklist

Entity Name: _____ Registration No.: _____

Jurisdiction: _____ Relationship: Buyer Supplier Both Other: _____ Risk: LOW MEDIUM HIGH

KYC Reference: _____ Onboarding Date: _____

Requirement	✓	Reference / Document No.	Expiry / Notes
Legal name and registration number confirmed	<input type="checkbox"/>		
Trade licence / DET Licence — copy obtained and valid	<input type="checkbox"/>	Lic. No: _____	Expiry: _____
Certificate of Incorporation obtained	<input type="checkbox"/>		
Memorandum & Articles of Association obtained	<input type="checkbox"/>		
List of directors and authorised signatories obtained	<input type="checkbox"/>		
ID documents for all directors and authorised signatories	<input type="checkbox"/>		Passport / EID copies on file
UBO identification: all natural persons owning ≥25% identified	<input type="checkbox"/>		
ID documents obtained for all UBOs	<input type="checkbox"/>		Passport copies on file
Ownership chain chart prepared (mandatory if 2+ corporate layers)	<input type="checkbox"/>		
Nature of business documented	<input type="checkbox"/>		
Expected turnover and transaction profile documented	<input type="checkbox"/>		
Source of funds / source of goods declared	<input type="checkbox"/>		
Sanctions screen — entity (all 4 lists)	<input type="checkbox"/>	Date: _____	Result: CLEAR / MATCH
Sanctions screen — all UBOs (all 4 lists)	<input type="checkbox"/>	Date: _____	Result: CLEAR / MATCH
Sanctions screen — all directors / authorised signatories	<input type="checkbox"/>	Date: _____	Result: CLEAR / MATCH
PEP check — all UBOs and directors	<input type="checkbox"/>	Date: _____	Result: PEP / NOT PEP

Adverse media check — entity and key principals	<input type="checkbox"/>	Date: _____	Result: <i>CLEAR / FLAGGED</i>
OECD supply chain due diligence completed (suppliers only)	<input type="checkbox"/>		<i>Chain-of-custody docs on file</i>

Field	Value	CDD Level	Next Review Date
Risk Rating	<input type="checkbox"/> LOW <input type="checkbox"/> MEDIUM <input type="checkbox"/> HIGH	<input type="checkbox"/> Standard CDD <input type="checkbox"/> EDD	<i>LOW: 36m MEDIUM: 24m HIGH: 12m</i>
EDD Senior Approval (HIGH risk only)	<input type="checkbox"/> N/A <input type="checkbox"/> Approved	Approved by: _____	Date: _____
Completed by (Analyst)		Date: _____	Signature: _____
Reviewed and approved by MLRO	Moses Jayaraj	Date: _____	Signature: _____

ANNEX III. STR PRE-SUBMISSION CHECKLIST

Purpose: Operationalises Section 8.4 of AML/CFT Policy V2.0. The MLRO must complete both Parts A and B for every STR filing via goAML. Retain the completed checklist with the STR file for minimum 5 years. REMINDER: Tipping off the subject is a criminal offence under UAE AML/CFT law.

Part A — Pre-Submission Checklist (complete before filing via goAML)

Checklist Ref: STR-CL-GBGT-____ - ____ ISR Reference: _____ Date Prepared: _____

✓	Pre-Submission Requirement	Reference / Notes
<input type="checkbox"/>	ISR reviewed by MLRO and suspicion substantiated on reasonable grounds	ISR Ref: _____
<input type="checkbox"/>	All Internal Suspicion Reports (ISRs) relating to this matter consolidated	No. of ISRs: ____
<input type="checkbox"/>	Full analytical narrative prepared — explains nature, sequence, and basis of suspicion	
<input type="checkbox"/>	All parties to the transaction identified and listed (names, IDs, entity details)	
<input type="checkbox"/>	Complete transaction trail documented: dates, amounts, currencies, payment references, invoice numbers	
<input type="checkbox"/>	All supporting documents attached: IDs, invoices, assay certificates, SWIFT confirmations, bills of lading, emails	
<input type="checkbox"/>	Source of funds / source of wealth concerns documented and included in the narrative	
<input type="checkbox"/>	All applicable red flags identified and cross-referenced to AML/CFT Policy Section 8.2	Red flags noted: _____
<input type="checkbox"/>	goAML account confirmed active: moses@goldbrick.ae AML Reg. GMLMOEC467872254	
<input type="checkbox"/>	STR draft reviewed for completeness — all mandatory goAML fields populated	
<input type="checkbox"/>	Confidentiality reference to be included in the filing	
<input type="checkbox"/>	Tipping-off risk assessed — confirmed: no disclosure made or planned to subject or related parties	Criminal offence under UAE law
<input type="checkbox"/>	MLRO decision to file documented with written rationale	

Part B — Post-Filing Checklist (complete immediately after filing)

✓	Post-Filing Requirement	Reference / Notes
<input type="checkbox"/>	goAML Report Reference Number recorded in ISR Register	goAML Ref: _____
<input type="checkbox"/>	Date and time of STR filing recorded	Filed: _____
<input type="checkbox"/>	Ongoing enhanced monitoring instruction issued for this counterparty	
<input type="checkbox"/>	All evidence preserved and secured — no destruction or alteration of any document	
<input type="checkbox"/>	FIU / EOCN hold instruction (if received) complied with — no transactions released without authorisation	
<input type="checkbox"/>	STR and all supporting documents stored in confidential, restricted-access STR file	Retain: minimum 5 years
<input type="checkbox"/>	MLRO calendar reminder set to monitor for follow-up FIU request or instruction	

Part C — Filing Record & MLRO Sign-Off

Field	Detail	Value
ISR Reference(s)		
Subject / Counterparty Name		
Transaction Reference(s)		
goAML STR Reference Number		
Date and Time Filed		
MLRO Decision	<input type="checkbox"/> FILE STR <input type="checkbox"/> NO FURTHER ACTION (rationale documented) <input type="checkbox"/> PENDING	
MLRO Signature	Moses Jayaraj — Managing Director & MLRO	Date: _____

RECORD KEEPING: This completed checklist and all supporting documents must be stored in the confidential STR file. Access restricted to MLRO and Senior Management only. Retain for minimum 5 years from filing date per Federal Decree-Law No. 10 of 2025 and Cabinet Decision No. 134 of 2025.