



Anti-Money Laundering (AML) Policy and Procedure

Effective Date: August 14 2024

Version: 1.0

1. Purpose

Golden Titan DMCC (hereinafter referred to as "the Company") is committed to complying with all applicable laws and regulations regarding Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF). This policy outlines the procedures that must be followed to prevent the Company from being used for money laundering or terrorist financing activities.

2. Scope

This policy applies to all employees, directors, officers, agents, and any other individuals or entities acting on behalf of Golden Titan DMCC. The policy also applies to all transactions, clients, and third parties involved in the Company's operations.

3. Regulatory Framework

Golden Titan DMCC will comply with all relevant AML/CTF laws, including but not limited to:

- The UAE Federal Decree-Law No. 20 of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations.
- Dubai Multi Commodities Centre (DMCC) rules and guidelines on AML/CTF.
- International best practices and guidelines, such as those provided by the Financial Action Task Force (FATF).

4. Definitions

Money Laundering: The process by which individuals or entities attempt to conceal or disguise the origins of illegally obtained funds, making them appear legitimate.

Terrorist Financing: Providing funds for terrorist activities, whether from legal or illegal sources.

Beneficial Owner: The individual who ultimately owns or controls a client, whether directly or indirectly.

5. AML/CTF Compliance Officer

Golden Titan DMCC will appoint an AML/CTF Compliance Officer responsible for overseeing the implementation and enforcement of this policy. The Compliance Officer will have the authority to monitor transactions, conduct investigations, and report suspicious activities to the relevant authorities.

6. Customer Due Diligence (CDD)

Golden Titan DMCC will conduct Customer Due Diligence (CDD) measures in the following scenarios:

- New Clients: Before establishing a business relationship.
- Existing Clients: Periodically, based on risk assessment or when there is a change in the client's information or ownership structure.
- High-Risk Transactions: For transactions that are deemed high-risk, additional due diligence will be required.



CDD Measures Include:

- Identifying and verifying the client's identity using reliable, independent source documents, data, or information.
- Identifying the beneficial owner(s) and taking reasonable measures to verify their identity.
- Understanding and, where appropriate, obtaining information on the purpose and intended nature of the business relationship.
- Ongoing monitoring of the business relationship to ensure that the transactions being conducted are consistent with the Company's knowledge of the customer, their business, and risk profile.

7. Risk Assessment

Golden Titan DMCC will perform regular risk assessments to identify, assess, and understand the money laundering and terrorist financing risks that the Company may face. The risk assessment will consider:

- The type of customers served.
- The nature of the products and services offered.
- The geographical areas of operation.
- The delivery channels utilized.

8. Record-Keeping

Golden Titan DMCC will maintain records of all transactions, CDD documentation, and communications for a minimum period of [Insert Number of Years] years, in compliance with applicable laws. These records must be readily available for inspection by the relevant authorities.

9. Reporting Suspicious Activities

Employees must report any suspicious activities to the AML/CTF Compliance Officer immediately. The Compliance Officer is responsible for investigating and, if necessary, reporting suspicious activities to the relevant authorities in accordance with UAE laws and regulations.

10. Training

All employees of Golden Titan DMCC will receive ongoing AML/CTF training to ensure they are aware of their responsibilities and can identify and respond to suspicious activities. Training programs will be updated regularly to reflect changes in laws, regulations, and the Company's operations.

11. Internal Controls and Audits

Golden Titan DMCC will establish internal controls and conduct regular audits to ensure compliance with this AML policy. These controls will include procedures for:

- Monitoring and reporting transactions.
- Ensuring the accuracy and completeness of CDD records.
- Reviewing and updating the Company's risk assessment.

12. Penalties for Non-Compliance

Non-compliance with this policy may result in disciplinary action, up to and including termination of employment or contracts. The Company may also face legal penalties, including fines and sanctions, if found to be in violation of AML/CTF laws.



13. Policy Review

This AML Policy will be reviewed annually or more frequently if required, to ensure it remains current and compliant with any changes in laws, regulations, or the Company’s operations.

14. Conclusion

Golden Titan DMCC is committed to preventing money laundering and terrorist financing. By adhering to this policy and implementing robust AML/CTF measures, the Company aims to protect its reputation, ensure compliance with the law, and contribute to global efforts to combat financial crime.
