



MERIDAS
GOLD

Anti-Money Laundering, Combating the Financing of Terrorism, and Counter- Proliferation Financing (AML/CFT/CPF) Policy

MERIDAS GOLD REFINERY FZC

Version 5.0 · Effective 17 September 2026 · Internal / Confidential

DOCUMENT CONTROL

Anti-Money Laundering, Combating the Financing of Terrorism, and Counter-Proliferation Financing (AML/CFT/CPF) Policy	
Version	5.0
Effective Date	17 September 2026
Review Date	17 September 2027
Document Owner	Compliance Department
Classification	Internal / Confidential

VERSION HISTORY

Version	Date	Author	Changes
1.0	28 July 2022	Management	Initial policy establishment
1.1	15 January 2023	Compliance Officer	Updated regulatory references, added GoAML procedures
2.0	15 July 2023	Board of Directors	Major revision: Enhanced risk assessment framework, added monitoring procedures, updated training requirements
2.1	10 January 2024	Compliance Officer	Updated sanctions screening procedures, enhanced EDD requirements
3.0	28 July 2024	Board of Directors	Comprehensive update addressing audit findings: Added performance metrics, enhanced governance framework, updated regulatory compliance per UAE National Strategy 2024-27
4.0	08 November 2025	Shoraf Yasin Thakur	Comprehensive revision to tailor policy to UniGold Refinery FZC's (now Meridas Gold Refinery FZC) specific operations, services, and business model; incorporation of Federal Decree-Law No. 7 of 2024, Federal Decree Law No. 10 of 2025, Cabinet Resolution No. 134 of 2025; enhanced alignment with MoE supervisory requirements for DNFBPs
5.0	17 September 2026	Shoraf Yasin Thakur	Entity renamed from UniGold Refinery FZC to Meridas Gold Refinery FZC (all other registration details unchanged); policy retitled to AML/CFT/CPF Policy; regulatory framework updated to Federal Decree-Law No. 10 of 2025 (effective 14 October 2025) and Cabinet Resolution No. 134 of 2025 (effective 14 December 2025), which replace Federal Decree-Law No. 20 of 2018 and Cabinet Decision No. 10 of 2019; counter-proliferation financing added as an explicit third pillar; tax evasion added as a predicate offence; the "knew or should reasonably have known" liability standard and UAEFIU enforcement powers added; supervisory authority named as the Ministry of Economy and Tourism (MoET), with the MoET DNFBP Guidelines and DPMS Supplemental Guidance (March 2026) added; AED 55,000 threshold referenced to Article 3(3) of Cabinet Resolution No. 134 of 2025; LBMA Responsible Gold Guidance Version 10 timetable and FATF Mutual Evaluation readiness added; Product / Precious Metal Source risk factor added (Section 7.2); semi-annual reporting calendar set (Section 6.3); beneficial ownership record controls added (Section 11.4); customer risk bands aligned to the Company's enterprise risk scale (Section 7.3)

APPROVAL

Compliance Officer	Shoraf Yasin Thakur	_____	17 September 2026
Managing Director	_____	_____	_____
Board of Directors	_____	_____	_____

TABLE OF CONTENTS

1. Introduction and Purpose
 2. Scope and Applicability
 3. Regulatory Framework
 4. Definitions
 5. Meridas Gold Refinery FZC Business Profile
 6. AML/CFT Governance Structure
 7. Risk-Based Approach
 8. Customer Due Diligence (CDD)
 9. Enhanced Due Diligence (EDD)
 10. Simplified Due Diligence (SDD)
 11. Beneficial Ownership
 12. Transaction Monitoring
 13. Suspicious Transaction Reporting
 14. Sanctions Screening
 15. Record Keeping
 16. Employee Training and Awareness
 17. Internal Audit
 18. Confidentiality and Tipping Off
 19. Disciplinary Actions
 20. Policy Review
 21. Contact Information
-

1. INTRODUCTION AND PURPOSE

1.1 Introduction

Meridas Gold Refinery FZC ("the Company," "Meridas Gold," or "the Refinery") is a gold refining company licensed and operating in the Sharjah Airport International Free Zone (SAIF Zone), Sharjah, United Arab Emirates (UAE). As a gold refinery, the Company is classified as a Designated Non-Financial Business and Profession (DNFBP) under UAE law and falls within the broader category of Dealers in Precious Metals and Stones (DPMS).

Gold refineries have been identified by UAE authorities and international bodies, including the Financial Action Task Force (FATF), as inherently high-risk for money laundering (ML) and terrorist financing (TF) due to the nature of the precious metals trade, the high value of transactions, and the complexity of global supply chains.

This policy reflects Meridas Gold Refinery FZC's unwavering commitment to combating financial crime and maintaining the highest standards of integrity in all business operations.

1.2 Purpose

The purpose of this Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) Policy is to:

1. **Establish a comprehensive framework** specifically tailored to Meridas Gold Refinery FZC's gold refining operations, services, and business model for preventing, detecting, and reporting money laundering, terrorist financing, and proliferation financing activities.
 2. **Ensure full compliance** with all applicable UAE laws, regulations, and guidance issued by the Ministry of Economy and Tourism (MoET), the UAE Financial Intelligence Unit (UAEFIU), and the Central Bank of the UAE (CBUAE).
 3. **Protect the Company** from legal, regulatory, financial, and reputational risks associated with being used as a vehicle for financial crime.
 4. **Provide clear guidance** to all employees, management, and relevant stakeholders on their roles and responsibilities in the AML/CFT program.
 5. **Demonstrate to regulators, customers, and partners** that Meridas Gold Refinery FZC operates with integrity and in accordance with international best practices.
-

2. SCOPE AND APPLICABILITY

2.1 Scope

This policy applies to:

- **All operations** of Meridas Gold Refinery FZC, including gold refining, assaying, trading, and related services
- **All business relationships** established by the Company
- **All transactions** conducted by or through the Company
- **All gold supplies** received for refining, regardless of origin
- **All refined gold products** delivered to customers

2.2 Applicability

This policy is mandatory for:

- All directors, officers, and members of the Board
- The Compliance Officer and compliance team
- All employees at all levels
- All contractors, agents, and third parties acting on behalf of the Company
- All business units and departments

2.3 Geographic Scope

This policy applies to all activities conducted within the UAE and to all international transactions and relationships involving Meridas Gold Refinery FZC, with enhanced scrutiny applied to transactions involving:

- Conflict-Affected and High-Risk Areas (CAHRAs)
 - Countries identified as high-risk by FATF
 - Countries subject to international sanctions
-

3. REGULATORY FRAMEWORK

3.1 UAE Legal and Regulatory Framework

Meridas Gold Refinery FZC's AML/CFT program is designed to comply with the following UAE laws and regulations:

Primary Legislation:

- **Federal Decree-Law No. 10 of 2025** on Anti-Money Laundering, Combating the Financing of Terrorism, and Financing of Proliferation of Weapons of Mass Destruction – issued October 2025, **effective 14 October 2025**. This law **fully repeals and replaces** Federal Decree-Law No. 20 of 2018 (as previously amended by Federal Decree-Law No. 26 of 2021 and Federal Decree-Law No. 7 of 2024) and is now the Company's primary AML/CFT statute.

Executive Regulations:

- **Cabinet Resolution No. 134 of 2025** – Executive Regulation of Federal Decree-Law No. 10 of 2025, **effective 14 December 2025**. This Resolution (71 articles) **fully repeals and replaces** Cabinet Decision No. 10 of 2019 and all prior executive regulations, including Cabinet Decision No. 58 of 2020 on beneficial ownership procedures, Cabinet Decision No. 109 of 2023, and Cabinet Decision No. 132 of 2023 on administrative fines, which are retained below for historical reference only.

Superseded instruments (retained for reference): Federal Decree-Law No. 20 of 2018; Federal Decree-Law No. 26 of 2021; Federal Decree-Law No. 7 of 2024; Cabinet Decision No. 10 of 2019; Cabinet Decision No. 58 of 2020; Cabinet Decision No. 109 of 2023; Cabinet Decision No. 132 of 2023.

Sector-Specific Guidance:

- **Ministry of Economy and Tourism (MoET), Countering Money Laundering, Terrorism Financing and Proliferation Financing — Guidelines for Designated Non-Financial Businesses and Professions, March 2026**, issued under Article 49 of Cabinet Resolution No. 134 of 2025
- **MoET, Supplemental Guidance for Dealers in Precious Metals & Stones, March 2026**
- MoET circulars for DNFBPs, including circulars on high-risk countries
- MoET Due Diligence Regulations for Responsible Sourcing of Gold (compliance required from the audit period beginning 1 January 2023)
- Ministerial Decree No. 68 of 2024 on Responsible Sourcing
- Emirates Bullion Market Committee (EBC) Rules for Risk-Based Due Diligence in the Gold and Precious Metals Supply Chain

3.2 Supervisory Authorities

Authority	Role
Ministry of Economy and Tourism (MoET)	Primary supervisor for DNFBPs including gold refineries; issues sector-specific guidance and circulars; conducts inspections; imposes administrative penalties
UAE Financial Intelligence Unit (UAEFIU)	Receives, analyzes, and disseminates STRs; operates the goAML system; under Federal Decree-Law No. 10 of 2025, may suspend a transaction for up to 10 working days and freeze assets for up to 30 days (extendable)
Central Bank of UAE (CBUAE)	Supervises financial institutions; issues risk warnings
Supreme Committee/ National Committee	Oversees national AML/CFT strategy and policy coordination

3.3 International Standards

This policy also aligns with:

- FATF Recommendations (particularly Recommendations 22 and 23 for DNFBPs)
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs (Third Edition)
- London Bullion Market Association (LBMA) Responsible Gold Guidance, **Version 9**, current for production from 1 January 2022. **Version 10** has completed its first public consultation (10 June – 10 July 2026); LBMA expects final publication in **December 2026**, an implementation period running **1 January to 31 December 2027**, and first audits against it for the reporting year ending **31 December 2027**. The Company will adopt Version 10 on that timetable
- UAE National Strategy for AML/CFT (2024-2027)

3.4 What Changed Under Federal Decree-Law No. 10 of 2025 and Cabinet Resolution No. 134 of 2025

Area	Change	Implication for the Company
Counter-Proliferation Financing (CPF)	Financing of the proliferation of weapons of mass destruction is now an explicit third pillar alongside AML/CFT	Proliferation financing risk is integrated into the enterprise-wide risk assessment (Section 7) and CDD/EDD procedures (Sections 8-9)
Predicate offences	Tax evasion (direct and indirect) is now expressly recognized as a predicate offence for money laundering	Red flag indicators (Section 12.3) and STR assessment criteria now explicitly consider tax-evasion-linked activity
Liability standard	Entities may face exposure where they "knew or should reasonably have known" funds were illicit, an objective negligence-based standard	Reinforces the need for documented, risk-based decision-making at every CDD/EDD and transaction-monitoring step
FIU powers	Transaction suspension (up to 10 working days) and asset freezing (up to 30 days, extendable); UAE courts may enforce qualifying foreign judicial orders without a fresh local investigation	The Company will cooperate fully and promptly with any UAEFIU suspension or freeze order
DNFBP scope	Additional DNFBP categories were formally designated under the new framework	No direct change to the Company's own DNFBP classification as a DPMS/gold refinery

3.5 FATF Mutual Evaluation Readiness

The UAE is scheduled for its **5th Round Mutual Evaluation**, assessed jointly by the FATF and MENAFATF. The FATF assessment calendar gives an indicative onsite period of **June 2026** and indicative Plenary discussion in **February 2027**; both are marked by the FATF as possible dates rather than confirmed ones, and the Compliance Officer shall confirm the position with MoET before relying on either. Assessors will examine real-world outcomes and enforcement results, with particular focus on beneficial ownership transparency, sanctions implementation, and cross-border cooperation. In preparation, the Company will maintain an up-to-date enterprise-wide risk assessment, evidence of effective transaction monitoring, and STR filings that are demonstrably compliant with Federal Decree-Law No. 10 of 2025, and will be prepared to produce this evidence to the Compliance Officer, the Board, or MoET/UAEFIU on request.

4. DEFINITIONS

Term	Definition
AML	Anti-Money Laundering – laws, regulations, and procedures designed to prevent criminals from disguising illegally obtained funds as legitimate income
CFT	Combating the Financing of Terrorism – measures to prevent the collection or provision of funds intended to finance terrorist activities
Beneficial Owner (BO)	Any natural person who ultimately owns or controls a customer or the person on whose behalf a transaction is conducted, including any person with 25% or more ownership or voting rights

Term	Definition
CDD	Customer Due Diligence – the process of verifying customer identity and assessing risk
DNFBP	Designated Non-Financial Business and Profession – categories of businesses including DPMS that are subject to AML/CFT obligations
DPMS	Dealers in Precious Metals and Stones – businesses dealing in gold, silver, precious metals, and gemstones
EDD	Enhanced Due Diligence – additional verification measures applied to high-risk customers or transactions
FIU	Financial Intelligence Unit – the national center for receiving and analyzing STRs
goAML	The electronic platform operated by UAEFIU for filing suspicious transaction reports
KYC	Know Your Customer – the process of identifying and verifying customer identity
ML	Money Laundering – the process of concealing the origins of illegally obtained money
PEP	Politically Exposed Person – an individual entrusted with a prominent public function
PF	Proliferation Financing – providing funds or financial services used, in whole or part, for the manufacture, acquisition, development, or use of weapons of mass destruction, recognized as an explicit third pillar of the Company's program alongside AML/CFT under Federal Decree-Law No. 10 of 2025
Predicate Offence	An underlying criminal offence (e.g., fraud, corruption, or tax evasion) that generates proceeds capable of being laundered
STR	Suspicious Transaction Report – a report filed with the FIU regarding suspected ML/TF/PF activity
TF	Terrorist Financing – providing or collecting funds to support terrorist acts
UBO	Ultimate Beneficial Owner – the natural person(s) who ultimately owns or controls a legal entity

5. MERIDAS GOLD REFINERY FZC BUSINESS PROFILE

5.1 Company Overview

Meridas Gold Refinery FZC is a precious metals refinery licensed to operate in the Sharjah Airport International Free Zone (SAIF Zone), Sharjah, United Arab Emirates. The Company specializes in the refining and processing of gold to produce high-purity refined gold products.

5.2 Core Services

Meridas Gold Refinery FZC provides the following services:

Service	Description	AML Risk Considerations
Gold Refining	Processing of raw gold, doré bars, and scrap gold to produce refined gold of 995+ purity	High – source verification critical; potential for laundering through mixing legitimate and illicit gold
Assaying Services	Testing and certification of gold purity and composition	Medium – documentation integrity essential
Gold Trading	Purchase and sale of refined gold products	High – high-value transactions; customer verification essential
Toll Refining	Refining gold on behalf of third parties who retain ownership	High – beneficial ownership verification critical
Storage Services	Secure storage of gold on behalf of customers	Medium – ongoing monitoring of stored assets

5.3 Customer Base

Meridas Gold Refinery FZC serves the following customer categories:

- Artisanal and Small-Scale Mining (ASM) cooperatives and aggregators
- Large-scale mining companies
- Gold traders and dealers
- Jewelry manufacturers
- Financial institutions and bullion banks
- Central banks and sovereign entities
- Scrap gold collectors and recyclers
- Other refineries

5.4 Geographic Footprint

Primary markets: UAE, Middle East, Africa, South Asia, Europe

Higher-risk source regions requiring enhanced scrutiny:

- Countries on FATF grey or black lists
- Conflict-Affected and High-Risk Areas (CAHRAs) as defined by OECD
- Sanctioned jurisdictions

5.5 Business Model Risk Assessment

Given its business profile, Meridas Gold Refinery FZC recognizes the following inherent ML/TF risks:

1. **Product Risk:** Gold is a high-value, portable, and liquid asset that can be used to store and transfer value anonymously
 2. **Customer Risk:** Customers may include entities from high-risk jurisdictions or with complex ownership structures
 3. **Geographic Risk:** Supply chains may involve CAHRAs or countries with weak AML frameworks
 4. **Channel Risk:** Complex multi-party transactions across borders
 5. **Service Risk:** Toll refining and trading services present elevated verification challenges
-

6. AML/CFT GOVERNANCE STRUCTURE

6.1 Board of Directors Responsibilities

The Board of Directors has ultimate responsibility for ensuring that Meridas Gold Refinery FZC maintains an effective AML/CFT program. The Board shall:

- Approve this AML/CFT Policy and all material amendments
- Ensure adequate resources are allocated to the compliance function
- Receive and review regular compliance reports
- Set the tone from the top regarding the Company's commitment to compliance
- Ensure the appointment of a qualified Compliance Officer

6.2 Senior Management Responsibilities

Senior Management shall:

- Implement the AML/CFT program approved by the Board
- Ensure day-to-day compliance with this policy
- Support the Compliance Officer in executing their duties
- Escalate significant compliance issues to the Board
- Foster a culture of compliance throughout the organization

6.3 Compliance Officer

Appointed Compliance Officer (effective 05 August 2025): Shoraf Yasin Thakur

The Compliance Officer shall:

Duty	Description
Program Oversight	Manage and maintain the AML/CFT program
Risk Assessment	Conduct and update enterprise-wide ML/TF risk assessments
Policy Development	Develop, update, and implement AML/CFT policies and procedures
Training	Design and deliver AML/CFT training programs
STR Review	Review and approve all suspicious transaction reports prior to filing
goAML Reporting	Ensure timely and accurate filing of STRs via the goAML system
Regulatory Liaison	Serve as the primary point of contact with MoET, UAEFIU, and other authorities
Internal Reporting	Prepare semi-annual compliance reports for senior management and the Board
Record Keeping	Ensure maintenance of all required AML/CFT records
Internal Audit Coordination	Coordinate with internal and external auditors on AML/CFT matters

Reporting Line: The Compliance Officer reports directly to the Board of Directors and has direct access to the CEO.

Independence: The Compliance Officer shall operate with independence and authority to escalate concerns without obstruction.

Senior Management Reporting Calendar: The semi-annual compliance report required under the Internal Reporting duty above shall follow a defined calendar, applicable regardless of any transition in the Compliance Officer or MLRO role during the reporting year:

Period Covered	Report Due By
1 January – 30 June (H1)	31 July
1 July – 31 December (H2)	31 January of the following year

The Board shall confirm receipt of both the H1 and H2 reports each year, and any missed deadline shall itself be escalated to the Board without delay.

6.4 goAML Registration Details

Meridas Gold Refinery FZC is registered on the goAML portal:

Field	Details
Registered Name	MERIDAS GOLD REFINERY FZC
Organizational ID	15641
Authorized Admin	Shoraf Yasin Thakur (effective 05 August 2025)
Registered Email	refinery@meridasgold.com
Registered Mobile	+971 50 968 01 65

6.5 All Employees

All employees are responsible for:

- Understanding and complying with this policy
- Completing all required AML/CFT training
- Identifying and escalating suspicious activity to the Compliance Officer
- Maintaining confidentiality regarding STRs and investigations
- Cooperating fully with compliance reviews and audits

7. RISK-BASED APPROACH

7.1 Enterprise-Wide Risk Assessment

Meridas Gold Refinery FZC conducts a comprehensive enterprise-wide ML/TF risk assessment at least annually. This assessment:

- Identifies and evaluates ML/TF risks across all business lines, customers, products, services, delivery channels, and geographic areas
- Considers both inherent and residual risks
- Informs the allocation of compliance resources
- Is documented and approved by senior management and the Board

7.2 Customer Risk Classification

Customers are classified into risk categories based on:

Risk Factor	Low Risk Indicators	High Risk Indicators
Customer Type	Regulated financial institutions; listed companies	Cash-intensive businesses; shell companies; trusts
Geography	Low-risk jurisdictions with robust AML frameworks	CAHRAs; FATF grey/black list countries; sanctioned jurisdictions
Products/Services	Standard refining with clear documentation	Toll refining; complex multi-party arrangements
Product / Precious Metal Source	Verified recycled gold with complete, system-generated assay/XRF and chain-of-custody documentation (see Supply Chain Due Diligence Policy §9.2)	Mined or ASM-sourced gold; gold whose mined/recycled classification cannot be independently substantiated
Transaction Patterns	Consistent, predictable, well-documented	Unusual patterns; large cash; rapid turnover
Ownership	Clear, transparent ownership	Complex structures; nominee shareholders; opacity
PEP Status	Non-PEP	PEP or PEP associate

The Product / Precious Metal Source factor is assessed jointly with the Supply Chain Due Diligence Policy's Formal Risk Assessment Parameters (Supply Chain Policy §9.2) for every gold supply.

7.3 Risk Categories

These are the Company's single set of counterparty risk bands. They are defined in **Risk Assessment Framework v5.0 §11.2**, which is the controlling source, and the same four bands are used in the Customer Due Diligence Policy v5.0 §6.1 and in the risk assessment tool.

Category	CDD Level	Monitoring Intensity	Review Frequency
Low Risk	Simplified Due Diligence (where permitted)	Standard	Every 3 years
Medium Risk	Standard CDD	Enhanced	Annually
High Risk	Enhanced Due Diligence	Intensive	Every 6 months
Very High Risk	Enhanced Due Diligence with senior management approval	Intensive	Quarterly

Declining or exiting a relationship is an outcome, not a band. It is available at any band and is required where a prohibition in Section 8 applies, where satisfactory due diligence cannot be completed, or where a sanctions match is confirmed. A counterparty is not rated "Prohibited"; it is rated on the four bands above and then declined or exited.

8. CUSTOMER DUE DILIGENCE (CDD)

8.1 General Requirements

Meridas Gold Refinery FZC shall conduct CDD measures when:

- Establishing a business relationship with a new customer
- Carrying out a single cash transaction, or several linked transactions, equal to or exceeding **AED 55,000** (Article 3(3) of Cabinet Resolution No. 134 of 2025). The threshold is a trigger for the transaction-specific obligations; it is not an exemption from applying risk-based measures below it
- There is a suspicion of ML/TF regardless of transaction amount
- There are doubts about the veracity of previously obtained customer information

8.2 CDD Measures for Individual Customers

For individual customers, the Company shall:

1. **Identify the customer** by obtaining:
 - Full legal name
 - Date and place of birth
 - Nationality
 - Residential address
 - Occupation/source of income
 - Contact information
2. **Verify identity** using reliable, independent source documents:
 - Valid passport
 - Emirates ID (for UAE residents)
 - Government-issued photo ID
3. **Understand the purpose** of the business relationship
4. **Assess the customer's risk profile**

8.3 CDD Measures for Corporate Customers

For corporate customers, the Company shall:

1. **Verify legal existence** through:
 - Certificate of incorporation/registration
 - Trade license
 - Memorandum and Articles of Association
2. **Understand ownership and control structure:**
 - Shareholder register
 - Organizational chart
 - Board resolution authorizing the relationship
3. **Identify and verify:**
 - All directors and officers
 - All beneficial owners (see Section 11)
 - Authorized signatories
4. **Verify identity of authorized representatives**
5. **Understand the nature of business and source of funds/wealth**

8.4 Ongoing Due Diligence

CDD is not a one-time exercise. Meridas Gold Refinery FZC shall:

- Monitor transactions throughout the relationship
- Keep customer information up to date
- Conduct periodic reviews based on risk category
- Re-assess risk ratings when circumstances change

8.5 Timing of CDD

CDD must be completed **before** establishing a business relationship or executing a transaction. In exceptional cases where completion before is not possible:

- The relationship may proceed if the risk is appropriately managed
- Verification must be completed as soon as reasonably practicable
- The delay must be necessary to avoid interrupting normal business
- Effective risk management measures must be in place

9. ENHANCED DUE DILIGENCE (EDD)

9.1 When EDD is Required

EDD must be conducted for:

- Customers classified as high risk
- Politically Exposed Persons (PEPs) and their family members/close associates
- Customers from high-risk countries (FATF grey/black lists)
- Complex or unusual transaction structures
- Gold originating from Conflict-Affected and High-Risk Areas (CAHRAs)
- Customers with complex or opaque ownership structures
- Any situation where there is a higher risk of ML/TF

9.2 EDD Measures

In addition to standard CDD, EDD measures include:

1. **Obtaining senior management approval** before establishing or continuing the relationship
2. **Enhanced verification of source of funds and source of wealth:**
 - Detailed inquiry into the origin of gold supplies
 - Verification of mining licenses, export permits, and chain of custody documentation
 - Third-party verification where appropriate
3. **Increased monitoring:**
 - More frequent transaction reviews
 - Lower thresholds for alerts
 - More frequent relationship reviews
4. **Additional documentation requirements:**
 - Mine site certificates
 - Government export documentation
 - Independent audit reports
 - Third-party due diligence reports
5. **On-site visits** where appropriate
6. **Verification through multiple sources**

9.3 PEP Procedures

For PEPs, Meridas Gold Refinery FZC shall:

- Screen all customers and beneficial owners against PEP databases
 - Obtain senior management approval for PEP relationships
 - Establish the source of wealth and source of funds
 - Conduct enhanced ongoing monitoring
 - Maintain PEP status throughout the relationship (including for former PEPs for an appropriate period)
-

10. SIMPLIFIED DUE DILIGENCE (SDD)

10.1 When SDD May Be Applied

SDD may only be applied where the Company has assessed that the ML/TF risk is demonstrably low. Potential low-risk scenarios include:

- Listed companies subject to regulatory disclosure requirements
- Regulated financial institutions in low-risk jurisdictions
- Government entities from low-risk jurisdictions

10.2 SDD Measures

SDD does not mean no due diligence. The Company shall still:

- Identify and verify the customer
- Monitor the relationship
- Maintain records

SDD allows for:

- Reduced frequency of customer identification updates
- Reduced frequency of ongoing monitoring
- Inference of verification from regulated status

10.3 Restrictions on SDD

SDD shall **never** be applied:

- When there is any suspicion of ML/TF
- For customers from high-risk jurisdictions
- For PEPs
- For complex ownership structures
- Where explicitly prohibited by regulations

11. BENEFICIAL OWNERSHIP

11.1 Identification Requirements

Meridas Gold Refinery FZC shall identify and verify the identity of all beneficial owners of corporate customers. A beneficial owner is defined as:

- Any natural person who ultimately owns or controls **25% or more** of the shares or voting rights
- Any natural person who otherwise exercises ultimate control over the customer
- Where no natural person meets the above criteria, the senior managing official

11.2 Verification

The Company shall:

- Obtain official documentation of ownership structure
- Verify identities of all beneficial owners as for individual customers
- Understand the nature of control exercised
- Be alert to nominee arrangements, trusts, and other structures that may obscure beneficial ownership

11.3 Complex Structures

For customers with complex or multi-layered ownership structures:

- The Company shall trace ownership through all layers to identify natural person beneficial owners
- Enhanced scrutiny shall be applied
- Additional documentation may be required
- Where beneficial ownership cannot be adequately determined, the Company shall not establish or continue the relationship

11.4 UBO Records System Integrity

To ensure the accuracy of UBO records within the risk assessment system and prevent misclassification of verified ownership information:

- The Compliance Officer shall periodically test and validate the UBO-identification fields of the risk assessment tool to confirm they accurately reflect verified ownership information
- Any system-flagged "UBO not identified" result shall be manually reconciled against the underlying KYC file before being relied upon
- Identified system errors shall be logged, corrected, and reported to senior management, with confirmation of resolution retained as part of the compliance record

12. TRANSACTION MONITORING

12.1 Purpose

Transaction monitoring enables Meridas Gold Refinery FZC to detect unusual or suspicious activity that may indicate ML/TF.

12.2 Monitoring Framework

The Company employs a combination of:

- **Automated monitoring:** System-based screening for anomalies, thresholds, and patterns
- **Manual review:** Expert analysis of flagged transactions
- **Ongoing surveillance:** Continuous assessment of customer behavior against expected profile

12.3 Red Flags and Indicators

The following are indicative red flags specific to gold refining operations:

Category	Red Flag Indicators
Customer Behavior	Reluctance to provide information; inconsistent information; unusual interest in compliance procedures
Transaction Patterns	Transactions inconsistent with customer profile; unusual transaction sizes; structuring to avoid thresholds
Documentation	Missing or inconsistent documentation; forged documents; reluctance to provide documentation
Geographic	Gold sourced from CAHRAs; transactions involving sanctioned jurisdictions; circuitous routing
Payment	Cash payments; payments from third parties; use of multiple accounts; rapid movement of funds
Gold Supply	Unverifiable origin; inconsistent purity claims; unusual physical characteristics; missing chain of custody
Tax / Predicate Offence	Under-invoicing or over-invoicing; mismatched customs and commercial values; indications that duties, taxes, or royalties on gold have not been paid in the country of origin
Proliferation Financing	Counterparties or jurisdictions linked to UN or UAE proliferation-related sanctions lists; transactions involving dual-use goods or entities with no clear connection to the gold trade

12.4 Response to Red Flags

When red flags are identified:

1. The matter is escalated to the Compliance Officer
2. Additional information and documentation are obtained
3. Enhanced monitoring is applied
4. A determination is made whether to file an STR
5. The relationship may be suspended or terminated if risks cannot be mitigated

13. SUSPICIOUS TRANSACTION REPORTING

13.1 Obligation to Report

Meridas Gold Refinery FZC shall report to the UAEFIU via the goAML system when there are **reasonable grounds to suspect** that:

- A transaction or attempted transaction involves proceeds of crime
- Funds are related to or intended to be used for ML/TF, **or the financing of proliferation of weapons of mass destruction (PF)**
- Funds may be connected to tax evasion or another predicate offence under Federal Decree-Law No. 10 of 2025
- Regardless of the amount involved

Consistent with the objective liability standard introduced by Federal Decree-Law No. 10 of 2025, an STR obligation can also arise where the Company **knew or should reasonably have known** that funds were illicit, even absent actual knowledge.

13.2 Reporting Process

Step	Action	Responsible Party
1	Detection of suspicious activity	Any employee
2	Internal escalation to Compliance Officer	Reporting employee
3	Investigation and assessment	Compliance Officer
4	Decision to file STR	Compliance Officer
5	Preparation of STR	Compliance Officer
6	Filing via goAML portal	Compliance Officer
7	Response to FIU requests	Compliance Officer

13.3 Timing

STRs must be filed **without delay** upon forming reasonable suspicion. The transaction should not be delayed if doing so would alert the customer (unless instructed by the FIU).

13.4 Content of STR

STRs shall include all relevant information:

- Customer identification details
- Transaction details
- Reason for suspicion
- Supporting documentation
- Any other relevant information

13.5 Record of Internal Decisions

Even where a decision is made not to file an STR, the assessment and reasoning shall be documented and retained.

14. SANCTIONS SCREENING

14.1 Sanctions Compliance

Meridas Gold Refinery FZC shall comply with all applicable sanctions regimes, including:

- United Nations Security Council sanctions
- UAE domestic sanctions
- US OFAC sanctions (where applicable to transactions)
- EU sanctions (where applicable)
- Any other applicable sanctions

14.2 Screening Requirements

The Company shall screen:

- All customers at onboarding
- All beneficial owners
- All counterparties to transactions
- All ongoing relationships (periodically and upon sanctions list updates)

14.3 Screening Process

Element	Requirement
Frequency	At onboarding; upon any transaction; periodically; upon list updates
Lists	UN, UAE, OFAC SDN, EU consolidated, other applicable lists
Scope	Full name, aliases, variations
Escalation	All potential matches escalated to Compliance Officer
Resolution	True matches result in transaction blocking and regulatory notification

15. RECORD KEEPING

15.1 Retention Requirements

Meridas Gold Refinery FZC shall retain all records for a minimum of **five (5) years** from:

- The date of completion of a transaction, or
- The date of termination of a business relationship, or
- The date of completion of supervisory inspection, or
- The date of final judicial ruling

whichever is later.

15.2 Records to be Maintained

Category	Records
CDD Records	Customer identification documents; verification evidence; beneficial ownership records; risk assessments
Transaction Records	Transaction documents; contracts; invoices; payment records; gold supply documentation
STR Records	All STRs filed; supporting documentation; internal deliberations
Training Records	Attendance; materials; assessments
Compliance Records	Policies; risk assessments; audit reports; board minutes

15.3 Record Management

Records shall be:

- Organized to permit analysis and tracking
- Readily accessible for regulatory inspection
- Protected from unauthorized access
- Available immediately upon request by authorities

16. EMPLOYEE TRAINING AND AWARENESS

16.1 Training Program

Meridas Gold Refinery FZC maintains a comprehensive AML/CFT training program under the leadership of the Compliance Officer.

16.2 Training Requirements

Personnel	Initial Training	Refresher Training	Specialized Training
All employees	Upon joining	Annual	N/A
Front-line staff	Upon joining	Annual	Transaction monitoring; red flag identification
Compliance team	Upon joining	Semi-annual	Advanced AML; regulatory updates; investigations
Senior management	Upon appointment	Annual	Governance; regulatory obligations
Board members	Upon appointment	Annual	Oversight responsibilities

16.3 Training Content

Training shall cover:

- UAE AML/CFT laws and regulations
- Company policies and procedures
- Red flags and suspicious indicators specific to gold refining
- Reporting procedures
- Sanctions requirements
- Confidentiality obligations
- Consequences of non-compliance
- Recent regulatory developments and enforcement actions

16.4 Training Records

All training activities shall be documented, including:

- Date and duration
- Attendees
- Content covered
- Assessment results
- Trainer credentials

17. INTERNAL AUDIT

17.1 Independent Review

The AML/CFT program shall be subject to independent review to ensure its effectiveness. This review may be conducted by:

- Internal audit function (with appropriate independence)
- External auditors or consultants

17.2 Scope of Audit

Audits shall assess:

- Adequacy of policies and procedures
- Effectiveness of controls
- Compliance with regulatory requirements
- Quality of CDD and transaction monitoring
- Accuracy and timeliness of STR filing
- Adequacy of training
- Record-keeping practices

17.3 Frequency

Independent reviews shall be conducted at least **annually**.

17.4 Audit Findings

Findings and recommendations shall be:

- Documented in a written report
- Presented to senior management and the Board
- Addressed through a remediation plan with tracked action items
- A copy provided to the MoE as required

18. CONFIDENTIALITY AND TIPPING OFF

18.1 Prohibition on Tipping Off

It is **strictly prohibited** to disclose, directly or indirectly:

- That an STR has been or will be filed
- The content of an STR
- That an ML/TF investigation is being conducted

18.2 Confidentiality Obligations

All information related to STRs and ML/TF suspicions is **strictly confidential** and shall only be shared:

- With the FIU
- With other authorities as required by law
- With the Compliance Officer for legitimate compliance purposes

18.3 Consequences

Violation of confidentiality obligations is a criminal offense under UAE law and may result in:

- Criminal prosecution
- Regulatory penalties
- Immediate termination of employment

19. DISCIPLINARY ACTIONS

19.1 Employee Accountability

Any employee who:

- Violates this policy
- Fails to report suspicious activity
- Knowingly misleads or hinders an investigation
- Breaches confidentiality obligations

shall be subject to disciplinary action, up to and including **termination of employment** and referral to authorities.

19.2 Third-Party Accountability

Third parties acting on behalf of the Company who violate AML/CFT requirements shall have their contracts:

- Re-evaluated
- Suspended
- Terminated

19.3 Reporting Violations

Employees are encouraged to report potential AML/CFT policy violations to the Compliance Officer through the Company's confidential reporting mechanism without fear of retaliation.

20. POLICY REVIEW

20.1 Review Frequency

This policy shall be reviewed:

- At least **annually**
- Upon significant changes to laws or regulations
- Upon material changes to the Company's business
- Following significant compliance incidents
- At the direction of the Board

20.2 Amendment Process

Amendments shall be:

- Proposed by the Compliance Officer
- Reviewed by senior management
- Approved by the Board of Directors
- Communicated to all employees
- Documented in the version history

21. CONTACT INFORMATION

21.1 Compliance Officer

Field	Details
Name	Shoraf Yasin Thakur
Title	Compliance Officer
Email	compliance@meridasgold.com
Phone	+971 50 968 01 65
Appointment Date	05 August 2025

21.2 General Inquiries

For questions regarding this policy:

- **Email:** refinery@meridasgold.com
- **Website:** www.meridasgold.com

21.3 Confidential Reporting

To report suspected AML/CFT violations or concerns:

- **Email:** compliance@meridasgold.com (marked "Confidential")
 - **Phone:** +971 50 968 01 65
-

DECLARATION

By implementing this policy, Meridas Gold Refinery FZC reaffirms its commitment to operating with integrity, combating financial crime, and maintaining the trust of its regulators, customers, and stakeholders. All employees are expected to read, understand, and comply with this policy.

END OF DOCUMENT

This document is the property of Meridas Gold Refinery FZC and contains confidential information. Unauthorized distribution is prohibited.