

Example Bullion Trading DMCC

Anti-Money Laundering, Counter-Terrorist Financing and Counter-Proliferation-Financing Policy & Procedures Manual

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Document control

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Approved by	John Doe, Managing Director
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Applies to	All directors, officers and employees of Example Bullion Trading DMCC

Senior management approval

This Manual has been reviewed and approved by the senior management of Example Bullion Trading DMCC ("the firm"). Senior management is committed to conducting the firm's business in full compliance with the anti-money-laundering, counter-terrorist-financing and counter-proliferation-financing laws of the United Arab Emirates, and to maintaining systems and controls proportionate to the money-laundering, terrorist-financing and proliferation-financing risks the firm faces.

All directors, officers and employees of the firm are required to read, understand and comply with this Manual. Failure to comply may result in disciplinary action and, where the law has been broken, in personal criminal and administrative liability.

Signed: [_____] John Doe, Managing Director Date: [_____]

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1. Introduction & Purpose

1.1 Purpose of this Manual

This Manual sets out the policy of Example Bullion Trading DMCC for preventing, detecting and reporting money laundering, terrorist financing and proliferation financing, together with the procedures that give effect to that policy.

It has three purposes. First, it records the firm's obligations under the anti-money-laundering law of the United Arab Emirates so that senior management, the Money Laundering Reporting Officer and all staff share one understanding of what the firm must do. Second, it sets out the controls and procedures the firm applies — how customers are identified, how transactions are monitored, how suspicion is escalated and reported, and how records are kept. Third, it serves as evidence, to the firm's supervisory authority and to any inspector or auditor, that the firm operates a documented and functioning AML/CFT/CPF programme.

This Manual is the central document of the firm's compliance framework. The other policies, procedures, forms and tools the firm uses are consistent with it and, where relevant, expand on it.

1.2 Scope

This Manual applies to Example Bullion Trading DMCC in all of its business activities, at every location from which it operates, and to every director, officer and employee of the

firm, whether permanent, temporary or contracted. It also informs how the firm expects its agents and introducers, where it uses any, to conduct themselves.

The Manual addresses three connected risks, referred to together throughout as “ML/TF/PF”:

- **Money laundering** — processing the proceeds of crime to disguise their illegal origin.
- **Terrorist financing** — providing or collecting funds to be used for terrorism, whether or not the funds derive from crime.
- **Proliferation financing** — providing funds or services connected with the proliferation of weapons of mass destruction, including any breach or evasion of targeted financial sanctions relating to proliferation.

As a dealer in precious metals and stones, the firm handles high-value, portable and readily convertible goods. This makes the sector attractive to those seeking to launder money or move value, and it is the reason the firm is subject to the obligations described in this Manual.

This Manual covers the firm’s activities as a Dealer in Precious Metals and Stones. It does not address the additional money-laundering, terrorist-financing and proliferation-financing risks and obligations that arise where a firm accepts, makes or facilitates payment in virtual assets — including cryptocurrencies and stablecoins — or otherwise deals in virtual assets. A firm whose business involves virtual assets requires a dedicated virtual-asset compliance module to supplement this Manual, and should not rely on this Manual alone for that part of its activity.

1.3 The firm’s commitment

Example Bullion Trading DMCC does not tolerate the use of its business, in any form, to launder money or to finance terrorism or proliferation. The firm is committed to:

- complying fully with the AML/CFT/CPF laws of the United Arab Emirates;
- applying a risk-based approach, directing the greatest effort to the areas of greatest risk;
- knowing who its customers and suppliers are before it does business with them;
- monitoring its transactions and reporting suspicion to the authorities promptly and in confidence;
- keeping complete records; and
- training its people so that every member of staff understands their role.

Senior management leads this commitment, provides the resources to meet it, and holds the firm accountable for it.

1.4 Definitions and how to use this Manual

A full glossary of the terms used in the firm's compliance framework is provided as a separate document in this kit (the *UAE-Specific AML Glossary*). The terms most important to this Manual are:

- **DNFBP** — a Designated Non-Financial Business or Profession. The firm is a DNFBP.
- **DPMS** — a Dealer in Precious Metals and Stones, the specific category of DNFBP to which the firm belongs.
- **CDD** — Customer Due Diligence: the measures the firm takes to identify and understand its customers.
- **EDD** — Enhanced Due Diligence: the additional measures applied to higher-risk customers and situations.
- **Beneficial owner** — the natural person who ultimately owns or controls a customer.
- **PEP** — a Politically Exposed Person.
- **MLRO** — the Money Laundering Reporting Officer, the individual responsible for the firm's AML/CFT/CPF compliance.
- **STR** — a Suspicious Transaction Report made to the UAE Financial Intelligence Unit.
- **goAML** — the electronic portal operated by the UAE Financial Intelligence Unit through which the firm registers and reports.

Staff should read this Manual in full when they join the firm and again whenever it is updated. It is supported by the specific procedures, forms and tools in the firm's compliance framework; where a section of this Manual refers to such a document, that document should be used. Any question about how this Manual applies to a particular situation should be directed to the MLRO.