



Caprikrn FZE follows DMCC-Compliant Anti-Money Laundering (AML) – Counter Financing of Terrorism (CFT) and OECD Supply Chain Policy

1. Introduction:

In accordance with DMCC regulations and guidelines, Caprikrn FZE emphasizes its commitment to maintaining transparency, ethical sourcing, and combating financial malpractices, including money laundering and terrorist financing.

2. DMCC's KYC and Customer Due Diligence (CDD):

- a. Implement the DMCC's rigorous Know Your Customer (KYC) standards, which involve thorough vetting of customers, suppliers, and other business relationships.
 - b. Regular review and update of CDD information, ensuring it remains current and accurate.
 - c. Retain all KYC and CDD documentation for a minimum of five years, as stipulated by DMCC.
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3. Monitoring Transactions:

- a. Establish an internal threshold for transactions, after which enhanced due diligence is required.
 - b. Constantly monitor transactions to identify any suspicious patterns or activities and immediately report them to DMCC and relevant authorities.
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4. DMCC's Sanctions Compliance:

- a. Routinely monitor and adhere to DMCC's list of sanctioned countries and entities.
 - b. Avoid initiating or maintaining business relationships with blacklisted or high-risk parties.
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5. OECD Supply Chain & DMCC Practical Guidance:

- a. Strictly adhere to the DMCC Practical Guidance for market participants in the gold and precious metals industry.
 - b. Maintain transparency throughout the supply chain, ensuring traceability from origin to end-product.
 - c. Regularly audit the supply chain to ensure DMCC's practical guidance is followed.
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6. Risk-Based Approach:

- a. Adopt a risk-based approach as specified by DMCC, which categorizes customers and suppliers based on their associated risks.
 - b. Apply enhanced due diligence measures for high-risk categories, including Politically Exposed Persons (PEPs) and those from high-risk jurisdictions.
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7. Training & Competence:

- a. Ensure all employees undergo regular training sessions based on DMCC's AML-CFT guidelines.
 - b. Conduct routine assessments to ensure employee competence in identifying and reporting suspicious activities.
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8. Whistleblower Policy:

- a. Establish a whistleblower policy in alignment with DMCC guidelines to encourage reporting of any internal discrepancies.
 - b. Ensure anonymity and protection for whistleblowers against any form of retaliation.
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9. Continuous Evaluation and Reporting:

- a. Regularly review and adapt the AML-CFT and Supply Chain policies based on DMCC updates and feedback.
 - b. Submit periodic compliance reports to DMCC as stipulated.
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10. Conclusion:

Caprikrn FZE's unwavering commitment to DMCC's rigorous AML-CFT and Supply Chain standards underscores our dedication to fostering a transparent, ethical, and compliant trade environment within the UAE. Every stakeholder's support is imperative in this endeavor to ensure the highest standards of operation.