

# ALAYA GOLD

## Due Diligence Policy

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## ❖ CUSTOMER DUE DILIGENCE (CDD)

All information and documents must be collected before entering into business relationship:

### **NATURAL PERSONS:**

- Applicant's full name (as per passport).
- Date and place of birth.
- Nationality.
- Physical Address (residential and business / home country and UAE);
- Contact details.
- Previous personal / business activities / occupation (type and volume);
- Anticipated type and volume of company's activities.
- Bank reference and introductory letter; and
- Source of funds

### **Documents required.**

- The passport and identity card (Emirates ID) of individual customers must be checked and a certified copy thereof must be maintained.
- List of non-exhaustive documents for example Driving license, Recent Utility bill, rates or council tax bill, Statement from a regulated bank, building society or credit card company, mortgage statement issued from a regulated lender, Salary Certificate from customer's current employer on a company letter head signed by the authorized person with company stamp, Tenancy Contract or Rental Agreement.
- The Company shall request individual applicants who present only photocopies of identifications and other documents to produce or show the original documents for verification purposes. The prospective customers shall be interviewed personally.

The following checks shall be instituted for non-face-to-face prospective applicants and customer:

- Telephone contact with the applicant at an independently verified home or business number;
- Subject to the applicant's consent, telephone verification of the applicant's employment with the employer's personnel department at a listed business number;
- Income or salary details appearing on recent bank statements, income tax returns or any other document evidencing income or compensation;
- Confirmation of the address through an exchange of correspondence or by other appropriate methods;
- An initial deposit drawn on another financial institution regulated by the central bank of uae will provide additional assurance as to identity.

### **CORPORATES**

- Incorporated name
- Shareholders and or controlling interest (in case applicant company being non-publicly traded);
- Ultimate beneficial owners (in case applicant company is not publicly-traded);
- Managers Details
- Signatories Details
- Country of origin / UAE physical address (if applicable);
- Contact details

- Anticipated type and volume of activities;
- Audited financial statements
- Source of funds; and Source of Wealth

#### **Document Required**

- Valid Registration Certificate, Trade & Regulatory License showing registration details.
- Valid VAT Certificate.
- Copy of the Memorandum of Association and Articles of Association showing the renewal date and all the partners including their shareholding pattern.
- Tenancy Contract of the Office to validate the names and addresses and official presence of the business
- Audited Financial Copy of the Firm to validate the source of wealth and source of funds.or
- Statement from a regulated bank,
- Certified copies of the identification document of Ultimate Beneficial owners, Corporate Organisation Chart etc
- Certified copies of the identification document of authorized signatories.
- Self Attested copy of Tenancy Contract /utility bill of the UBO and shareholders name and residential address to validate the Residency Status.
- As for public shareholding companies, the names and addresses of the Chairman, members of the Board of Directors and shareholders whose holdings are in excess of 5% each.
- As for companies where the ownership has an involment of Trust, we would require a copy of the Trust Deed,and Identifaction document of the Trustee (Nominal and Benficial).
- Any additional documents as necessary for placement of any specific risks or carrying out additional diligence. List of non-exhaustive documents such as Recent Company Utility Bill

#### **TRUSTEE NOMINEE OR FIDUCIARY ACCOUNTS**

Al Aya Gold shall establish whether the applicant for business relationship is acting on behalf of another person as trustee, nominee or agent. Al Aya Gold will obtain satisfactory evidence of the identity of such agents and authorized signatories, and the nature of their trustee or nominee capacity and duties.

Where the Compliance officer or Al Aya Gold staff entertains doubts as to whether the trustee, nominee or agent is being used as a dummy in circumvention of existing laws, it shall immediately make further inquiries to verify the status of the business relationship between the parties. If satisfactory evidence of the beneficial owners cannot be obtained, the Al Aya Gold shall consider whether to proceed with the business, bearing in mind the “Know-Your-Customer” principle.

Al Aya Gold does not deal with shell company or illegal organization or sanction individual or entities by UAE Sanctioned List or the UNSCR Consolidated List.

#### **❖ Enhanced Due Diligence (EDD)**

In addition to the CDD, Enhanced due diligence is required for the High-risk customers including Politically Exposed Persons (PEPs) or in cases where the compliance has requested to perform enhanced due diligence as case may be. In ensuring carrying out enhanced due diligence Al Aya Gold would:

- Increase scrutiny and will implement higher standards of verification and documentation from reliable and independent sources with regard to customer identity;
- Carry out more detailed inquiry and evaluation of reasonableness in regard to the purpose of the Business Relationship, the nature of the customer's business, the customer's source of funds and source of wealth, and the purpose of individual transactions;
- Increase supervision of the Business Relationship, including the requirement for owner approval, more frequent monitoring of transactions, and more frequent review and updating of customer due diligence information.
- EDD should also be applied where the Red flags has been identified (Refer Appendix 1 for list of Red Flags). In doing so Al Aya Gold should ensure that it take reasonable measures to obtain adequate, substantiated, information about the customer, commensurate with the level of the risks identified.

#### **Natural Persons/Individuals**

- Obtain the information source of wealth and source of fund and verify by obtaining the Last three-month/Six-month Bank statements based on the risk assessment.
- Tax assessment documents or any other official correspondence issued by the central or local govt.
- Banking references;
- Domicile/ Residency Status
- Description of the customer's primary trade area and whether international transactions are expected to be routine;
- Description of the business operations, the anticipated volume of currency and total sales, and a list of major customers and suppliers; and
- Explanations for changes in business activity

#### **Corporates**

- Obtain the Source of Fund used in the transaction and verify using Audited Annual report/Financial Statement the annual income, Turnover etc. for the last three years.
- Obtain the name of the bank that the customer or the beneficiary deals with.
- Banking references;
- Domicile and Residency Status of the UBO , Shareholder and Director.
- Description of the customer's primary trade area and whether international transactions are expected to be routine;
- Description of the business operations, the anticipated volume of currency and total sales, and a list of major customers and suppliers; and

Compliance Officer has full discretion to request for any additional documentation to establish the identification of the Customer, Ultimate Beneficial Owner and/or the Source of Funds and the business relationship non-involvement into any conflict activity.

#### **❖ Simplified Due Diligence (SDD)**

Simplified due diligence is required if a customer is:

- Customer is from a Low Risk Country
- Customers has well established Source of Funds

- In case of listed company where such information is available from the third-party sources such as audited financial statement of the listed company on their website or in case of legal entity beneficial owner where the customer is holding the controlling interest of the legal entity listed on the stock exchange.
- Cases that are internally assessed and documented for simplified due diligence from time to time.