CORPORATE POLICY

# MD OVERSEAS FZCO

## AML/CFT/CPF Compliance Policy

Version 2026

| DOCUMENT CONTROL | |
|---|---|
| DOCUMENT REFERENCE | MDO/POL/01 |
| DOCUMENT OWNER | Compliance Department |
| APPROVED BY | Senior Management |
| VERSION | 2026 |
| EFFECTIVE DATE | 01 January 2026 |
| NEXT SCHEDULED REVIEW | January 2027 |
| REVIEW FREQUENCY | At least annually and upon material legal or regulatory change |
| CLASSIFICATION | Public |

**REGISTERED / BUSINESS ADDRESS**

Unit No. 2910, DMCC Business Centre, Level No. 1, Jewellery & Gemplex 3,
Dubai, United Arab Emirates

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## 01 Purpose

MD OVERSEAS FZCO (the "Company") trades in jewellery and non-manufactured precious metals and is a Dealer in Precious Metals and Stones (DPMS). It is therefore a Designated Non-Financial Business and Profession (DNFBP) supervised for AML/CFT/CPF purposes by the Ministry of Economy and Tourism (MoET), and is registered on the goAML platform of the UAE Financial Intelligence Unit (FIU).

This Policy sets out the Company's commitment to preventing its business from being used for money laundering (ML), terrorist financing (TF) or proliferation financing (PF), and establishes the governance framework under which all other AML/CFT/CPF policies of the Company operate.

## 02 Legal and Regulatory Framework

This Policy is framed with reference to the following instruments, as amended or replaced from time to time:

- Federal Decree-Law No. 10 of 2025 regarding Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation Financing (the "AML Law").
- Cabinet Resolution No. 134 of 2025 issuing the Executive Regulations of the AML Law (the "Executive Regulations").
- Cabinet Resolution No. 74 of 2020 on the Terrorism Lists Regulation and Implementation of UN Security Council Resolutions, and guidance issued by the Executive Office for Control and Non-Proliferation (EOCN).
- Cabinet Resolution No. 109 of 2023 on the Regulation of Beneficial Owner Procedures.
- Cabinet Resolution No. 71 of 2024 on administrative penalties for AML/CFT/CPF violations.
- MoET circulars and guidance applicable to DPMS, including the AML/CFT Guidelines for DNFBPs, the Supplemental Guidance for DPMS and Circular No. 08/AML/2021 on the DPMS Report (DPMSR).
- Ministerial Decision No. 68 of 2024 on the Due Diligence Regulations for Responsible Sourcing of Gold, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Where a stricter requirement applies under law, regulatory guidance, a banking or refinery counterparty's requirements or another applicable jurisdiction, the Company will apply the stricter requirement.

## 03 Scope

This Policy applies to all directors, managers, employees and temporary personnel of the Company, and to agents, introducers and other third parties acting on its behalf. Compliance with this Policy is a condition of employment or engagement.

## 04 Policy Statement

The Company has zero tolerance for ML, TF and PF. It will not knowingly deal with any person, funds or precious metals connected with criminal activity, terrorism, proliferation or sanctioned parties, and will not enter into or continue any relationship where it cannot complete the required due diligence.

## 05 Compliance Framework

The Company maintains the following individual policies, which together with the AML/CFT/CPF Policies and Procedures Manual form its compliance programme:

| Ref. | Policy | Core obligation addressed |
|---|---|---|
| POL/02 | Enterprise-Wide Risk Assessment Policy | Risk-based approach and business risk assessment |
| POL/03 | Customer Due Diligence & KYC Policy | CDD, EDD, beneficial ownership, PEPs, ongoing monitoring |
| POL/04 | Targeted Financial Sanctions Policy | Screening, freezing and reporting to the EOCN |
| POL/05 | Suspicious Transaction & DPMSR Reporting Policy | STR/SAR, DPMSR and tipping-off |
| POL/06 | Record Keeping Policy | Retention and availability of records |
| POL/07 | Responsible Sourcing of Precious Metals Policy | Supply-chain due diligence |
| POL/08 | AML Training & Awareness Policy | Staff competence and awareness |
| POL/09 | Employee Screening Policy | Integrity of personnel |
| POL/10 | Independent Audit Policy | Independent testing of the programme |
| POL/11 | Whistleblowing Policy | Confidential reporting and non-retaliation |
| POL/12 | Anti-Bribery & Anti-Corruption Policy | Bribery and corruption risk |

> POL/07, POL/11 and POL/12 are published on the Company's website. The remaining policies are internal and are made available to regulators, auditors and banking or refinery counterparties on request.

## 06 Governance and Responsibilities

**Senior Management** is ultimately responsible for the Company's compliance with AML/CFT/CPF obligations. It approves this Policy and all related policies, approves high-risk relationships, provides adequate resources and receives regular compliance reports.

**The Compliance Officer** is appointed at management level with sufficient authority, independence, resources and access to information. Responsibilities include:

- Designing, implementing and updating the compliance programme and policies.
- Reviewing unusual transactions and deciding on and filing STRs/SARs, DPMSRs and sanctions reports on goAML.
- Acting as the Company's point of contact with MoET, the FIU and the EOCN.
- Overseeing CDD quality, sanctions screening, training and record keeping.
- Reporting to Senior Management at least annually, and promptly on material matters.

**All personnel** must understand and follow the Company's AML/CFT/CPF policies and escalate any concern to the Compliance Officer without delay.

## 07 Core Controls

- A documented enterprise-wide risk assessment, updated at least annually.
- Risk-based CDD before establishing a relationship or completing a covered transaction, with EDD for higher-risk customers and suppliers.
- Screening of customers, suppliers, beneficial owners and counterparties against applicable sanctions lists at onboarding, on list updates and before transactions.
- Ongoing monitoring of relationships and transactions for unusual activity.
- Timely reporting through goAML and strict confidentiality around reports.
- Supply-chain due diligence on precious-metal sourcing.
- Record retention for not less than five years.
- Periodic training, employee screening and independent audit.

## 08 Cooperation with Authorities

The Company will cooperate fully and promptly with MoET, the FIU, the EOCN, law enforcement and other competent authorities, including responding to information requests within the deadlines set by them.

## 09 Breaches

Failure to comply with this Policy may expose the Company and individuals to criminal liability and to administrative penalties under the AML Law and Cabinet Resolution No. 71 of 2024. Any breach may result in disciplinary action up to and including termination of employment or engagement, subject to applicable law.

## 10 Monitoring and Review

The Compliance Officer will monitor implementation of this Policy and report material issues to Senior Management. This Policy shall be reviewed at least annually and earlier where required by changes in law, regulatory guidance, the National Risk Assessment, the Company's business or its risk profile.

## 11 Contact

Questions about this Policy, or requests for the Company's AML/CFT/CPF documentation for due diligence purposes, may be addressed to:

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|---|---|
| Compliance Department | MD OVERSEAS FZCO |
| Email | compliance@mdoverseasdmcc.com |
| Address | Unit No. 2910, DMCC Business Centre, Level No. 1, Jewellery & Gemplex 3, Dubai, United Arab Emirates |

## 12 Approval

This AML/CFT/CPF Compliance Policy is approved for adoption by MD OVERSEAS FZCO with effect from **01 January 2026** and remains effective until replaced or amended by an authorised version.

| POLICY APPROVAL | |
|---|---|
| PREPARED BY | Compliance Department |
| APPROVED BY | Senior Management, MD OVERSEAS FZCO |
| EFFECTIVE DATE | 01 January 2026 |
| NEXT SCHEDULED REVIEW | January 2027 |

**Reference note:** This is the public version of the Company's policy. It is supported by the Company's AML/CFT/CPF Policies and Procedures Manual and internal procedures. Applicable legislation, regulatory guidance and official Arabic legal texts prevail in the event of inconsistency.