



## AML AND CFT POLICY

### Introduction

IGR is committed to support all efforts at local and international level to fight against money laundering, the financing of terrorism and other related offences.

Trough continuous monitoring and control, we aim to protect both our company and customers from potential risks and comply with the applicable laws and regulations.

### Definitions

**Money laundering** – the process by which criminals attempt to conceal the true origin and ownership of the proceeds of criminal activities. Criminals do this by disguising the sources, changing the form, or moving the funds to a place where they are less likely to attract attention

**The Financing of terrorism** – an offense within the meaning of the UN International Convention for the Suppression of the Financing of Terrorism (1999), where a person by any means, directly or indirectly, unlawfully and willingly, provides or collects funds with the intention that they should be used in order to carry out an act intended to cause death or serious bodily injury to civilian, when the purpose of such act is to illuminate a population or to compel a government or an international organization to do or to abstain from doing an act.

IGR Metals Trading DMCC is based in UAE under the Rules and Regulations of Dubai Multi Commodities Center. As such IGR is subject to the following laws: UAE Federal Law No.4 of 2002 regarding Criminalization of Money Laundering; UAE Federal Law No.1 of 2004 on Combating Terrorism Finance; Rule No.4 of 2002 for organizing operations at DMCC

As per Circular 5/2021 from UAE Ministry of Economy all companies dealing in precious metals trading must register on the “goAML” online portal to report suspicious activities directly through this electronic system.

Article 22 (7) of Rule No.4 of 2002 regarding organizing operations at DMCC stipulates that any activities that violates the laws of the State including money laundering are prohibited. Under this Law, DMCC Members are obligated to establish a set of policies and procedures to ensure they are not facilitating money laundering and/or financing of terrorism.

### IGR Commitment

IGR Metals Trading DMCC is committed to supporting both domestic and international efforts and initiatives aimed to combating money laundering and the financing of terrorism in addition to implementing such internal measures as may be deemed necessary. IGR will work only the business partners whose sources of funds can be reasonable established as legitimate and who do not pose any risk to IGR reputation.

IGR is following certain procedural checks to ensure the vigilant and effective operation of the Policy. The Procedures and Controls are as follows:

- Identification, verification and KYC measures
- Updating on KYC information
- Activity monitoring
- Reporting of suspicious activities
- Training and awareness
- Record keeping

**If you have any questions regarding to this policy, please contact our Compliance Department.**

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