

Ample Pro

**Anti – Money Laundering (AML) and Countering the
Financing of Terrorism (CFT) Policy**

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1. Introduction

Ample Pro Inc. (“the Company”) is committed to preventing money laundering and the financing of terrorism across its operations. As a gold trading business, the Company recognizes the heightened risk of financial crimes associated with the precious metals industry and is dedicated to complying with all relevant AML and CFT laws and regulations in both the United States and Dubai. This policy outlines the Company’s commitment to detecting, preventing, and reporting any activities related to money laundering and terrorist financing.

2. Scope and Applicability

This AML/CFT policy applies to all employees, officers, directors, contractors, suppliers, and other stakeholders involved in the Company’s operations, including its business activities in New York, the United States, and Dubai, UAE. It covers all aspects of the Company’s business, including customer interactions, financial transactions, and third-party relationships.

3. Legal and Regulatory Framework

The Company adheres to all applicable AML/CFT laws and regulations, including:

- **United States:** Compliance with the Bank Secrecy Act (BSA), the USA PATRIOT Act, and regulations enforced by the Financial Crimes Enforcement Network (FinCEN).
- **Dubai:** Compliance with UAE Federal Law No. 20 of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism, and the regulations issued by the Dubai Financial Services Authority (DFSA).

4. Risk Assessment

The Company will conduct regular risk assessments to identify and evaluate the potential risks of money laundering and terrorist financing within its operations. The risk assessment will consider:

- **Country Risk:** The inherent risks associated with doing business in specific jurisdictions, including Dubai.
- **Customer Risk:** The risk profile of customers based on factors such as nationality, occupation, and transaction history.

- **Product/Service Risk:** The risks associated with the products and services offered, particularly in relation to gold trading.
- **Transaction Risk:** The risks related to the types and volumes of transactions, especially those involving large sums or cross-border activities.

5. Customer Due Diligence (CDD)

The Company will implement stringent Customer Due Diligence (CDD) measures, including:

- **Know Your Customer (KYC):** Verifying the identity of all customers, beneficial owners, and related parties before establishing a business relationship. This includes obtaining identification documents, proof of address, and information on the purpose of the business relationship.
- **Enhanced Due Diligence (EDD):** Applying additional scrutiny for high-risk customers, including politically exposed persons (PEPs), customers from high-risk jurisdictions, or those engaging in high-value transactions.
- **Ongoing Monitoring:** Continuously monitoring customer transactions to detect and report suspicious activity.

6. Record Keeping

The Company will maintain comprehensive records of all transactions and CDD measures for at least five years, as required by U.S. and UAE regulations. These records will include:

- Copies of identification documents.
- Transaction records, including dates, amounts, and parties involved.
- Documentation of the risk assessment and CDD processes.

7. Reporting Obligations

The Company will comply with all reporting obligations under U.S. and UAE law, including:

- **Suspicious Activity Reports (SARs):** Filing SARs with FinCEN in the United States and with the relevant authorities in Dubai when suspicious activity is detected.

- **Currency Transaction Reports (CTRs):** Reporting large cash transactions that exceed specified thresholds, in accordance with U.S. and UAE regulations.
- **Cross-Border Reporting:** Complying with reporting requirements for cross-border transactions, particularly those involving high-risk jurisdictions.

8. Employee Training

The Company will provide regular training to all employees on AML/CFT policies and procedures, including:

- **Awareness Training:** Ensuring all employees understand the risks of money laundering and terrorist financing and their responsibilities in preventing such activities.
- **Role-Specific Training:** Providing additional training for employees in high-risk areas, such as sales, finance, and compliance.

9. Internal Controls and Compliance Monitoring

The Company will establish robust internal controls to ensure compliance with AML/CFT requirements, including:

- **Compliance Officer:** Appointing a Compliance Officer responsible for overseeing AML/CFT compliance, conducting regular audits, and liaising with regulatory authorities.
- **Internal Audits:** Conducting regular internal audits to assess the effectiveness of AML/CFT controls and identifying areas for improvement.
- **Independent Reviews:** Periodically engaging independent auditors to review the Company's AML/CFT program and recommend enhancements.

10. Third-Party Relationships

The Company will conduct due diligence on all third parties, including suppliers, agents, and business partners, to ensure they comply with the Company's AML/CFT standards. This includes:

- **Third-Party Screening:** Verifying the identity and background of third parties before entering into business relationships.

- **Ongoing Monitoring:** Continuously monitoring third-party transactions and relationships for signs of suspicious activity.
- **Contractual Obligations:** Including AML/CFT clauses in contracts with third parties, requiring them to adhere to the Company's AML/CFT policies.

11. Reporting Violations

The Company encourages employees to report any suspected violations of the AML/CFT policy through the Company's whistleblower hotline or other reporting channels. The Company will investigate all reports promptly and take appropriate action, including reporting to relevant authorities if necessary.

12. Compliance with International Standards

The Company's AML/CFT policy is designed to comply with international standards, including the Financial Action Task Force (FATF) Recommendations. The Company is committed to adopting best practices in AML/CFT compliance and continuously improving its policies and procedures.

13. Policy Review and Updates

This AML/CFT policy will be reviewed annually by the Company's Compliance Officer and updated as necessary to reflect changes in the law, regulatory requirements, or the Company's business operations. The Company is committed to maintaining an effective AML/CFT program that evolves with emerging risks and industry developments.

By implementing this AML/CFT Policy, Ample Pro Inc. aims to mitigate the risks associated with money laundering and terrorist financing, ensuring that its business operations in the United States and Dubai are conducted with the highest level of integrity and compliance.