

## ANTI-MONEY LAUNDERING (AML) AND COUNTER-TERRORIST FINANCING (CFT) POLICY

**Company Name:** Velmora Trading LLC

**Jurisdiction:** United Arab Emirates

**Effective Date:** 01/01/2026

**goAML Registration ID:** 27514

This Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) Policy sets out the principles and controls adopted by Velmora Trading LLC to prevent money laundering, terrorist financing, and other financial crimes, in accordance with applicable UAE laws and regulations.

### Regulatory Framework

Velmora Trading LLC complies with UAE Federal Decree-Law No. 20 of 2018, relevant Cabinet Decisions, guidance issued by the UAE Financial Intelligence Unit (FIU), goAML reporting requirements, and FATF recommendations.

### Risk-Based Approach

The Company applies a risk-based approach to identify, assess, and mitigate AML/CFT risks associated with its clients, suppliers, counterparties, products, and jurisdictions.

### Customer and Counterparty Due Diligence

Appropriate KYC/KYB procedures are conducted for all clients and suppliers, including verification of identity, beneficial ownership, licences, and legal authority.

### Responsible Sourcing

The Company deals only with licensed counterparties, confirms legal origin of precious metals, ensures tax and royalty compliance, and maintains basic chain-of-custody documentation.

### Ongoing Monitoring and Reporting

Business relationships are monitored on an ongoing basis. Any suspicious activity is reported via the UAE goAML platform in accordance with regulatory requirements.

### Record Keeping

All AML/CFT records are retained for a minimum of five (5) years.

### Declaration

This AML/CFT Policy is adopted and implemented by Velmora Trading LLC.

For and on behalf of Velmora Trading LLC

Vincenzo Oliveri

Managing Director / Authorised Signatory

*Oliver Vincenzo*



The stamp is circular with a double border. The outer border contains the text 'VELMORA TRADING L.L.C.' in capital letters. The inner border contains the Arabic text 'فيلمورا للتجارة ش.ذ.م.م.' (Velmora Trading LLC). In the center, it reads 'Lic.No. 1505309' and 'DUBAI - UAE'.