ANTI MONEY LAUNDERING POLICY

1. **POLICY STATEMENT**

AURUM FOUNDATION LIMITED is dedicated to adhering to all relevant laws and regulations concerning anti-money laundering (AML) and combating the financing of terrorism (CFT). We are focused on preventing our business from being utilized for money laundering or terrorist financing activities. To achieve this, we will take all necessary steps to ensure that our operations are conducted transparently and ethically.

1. **RISK ASSESSMENT**

AURUM FOUNDATION LIMITED conducted a risk assessment to identify potential money laundering and terrorism financing risks. Based on this assessment, we have implemented controls and procedures to mitigate these risks.

1. **CUSTOMER DUE DILIGENCE**

We have implemented customer due diligence (CDD) procedures to identify and verify the identity of our customers. Our CDD procedures include:

* Obtaining and verifying the customer's identity, including their name, address, and date of birth
* Conducting ongoing monitoring of customer activity to ensure that it is consistent with their expected behavior
* Identifying the beneficial owner of a customer, where applicable
* Obtaining additional information or documentation as necessary to verify a customer's identity
1. **SUSPICIOUS ACTIVITY MONITORING AND REPORTING**

We have implemented systems to monitor customer activity for suspicious activity, including transactions that are inconsistent with a customer's known business or financial profile. We will promptly report suspicious activity to the appropriate regulatory authorities if it is identified.

1. **STAFF TRAINING**

All staff members involved in customer due diligence or AML compliance activities will receive appropriate training to ensure that they understand their roles and responsibilities in preventing money laundering and terrorism financing. Training will be provided on an ongoing basis to ensure that staff members are aware of any changes to AML regulations or our policies and procedures.

1. **RECORD KEEPING**

AURUM FOUNDATION LIMITED will maintain records of all customer due diligence, suspicious activity reports, and other AML compliance activities. These records will be kept for at least five years and made available to regulatory authorities upon request.

1. **COMPLIANCE OVERSIGHT**

A designated compliance officer will oversee our AML compliance program. The officer will be responsible for ensuring that our policies and procedures are effective, that staff members are adequately trained, and that appropriate measures are taken to address any compliance deficiencies.

1. **INDEPENDENT REVIEW**

Our AML compliance program will undergo periodic independent reviews to ensure that it remains effective and compliant with all applicable laws and regulations.

1. **CONSEQUENCES OF NON-COMPLIANCE**

Non-compliance with this Policy may result in disciplinary action, up to and including termination of employment. In addition, our organisation may be subject to regulatory action and fines for non-compliance with AML regulations.

1. **POLICY REVIEW**

This Policy will be reviewed and updated continuously to ensure it remains effective and compliant with all applicable laws and regulations. Any updates to the Policy will be communicated to staff members and incorporated into their training.

**COMPANY**

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