

# Anti-Money Laundering and Counter-Terrorism Financing Policy Statement

## Overview

Gold Corporation (**Corporation**) is committed to taking steps to prevent money laundering and terrorism financing by adopting appropriate business practices and complying with applicable laws and regulations. As part of this commitment, the Corporation has established a joint Anti-Money Laundering and Counter-Terrorism Financing Program (**AML/CTF Program**) to mitigate the risk of services offered by the Corporation from being used to facilitate illegal activity.

## AML/CTF Program

The AML/CTF Program outlines the Corporation's approach to the identification, mitigation, and management of money laundering and terrorism financing risks that it faces in connection with providing its customers with the opportunity to use the Corporation's products and services.

## Risk-based approach

The Corporation recognises that money laundering and terrorism financing risks vary based on several factors, such as customer type, products, services, and geography. Therefore, the Corporation employs a risk-based approach to addressing money laundering and terrorism financing risks which includes:

- conducting risk assessments on its customers, products, services, and geographic areas of operation to identify and assess risks of money laundering and terrorism financing;
- conducting enhanced customer due diligence procedures on high-risk customers and transactions;
- implementing risk-based policies and procedures to mitigate identified risks; and
- periodically reviewing and updating risk assessments to ensure that policies and procedures remain effective.

## Compliance with regulatory requirements

The Corporation is committed to complying with all applicable Anti-Money Laundering and Counter-Terrorism Financing (**AML/CTF**) laws and regulations, including the Anti-Money Laundering and Counter-Terrorist Financing Act 2006 (Cth) and associated rules (**AML/CTF Law**). To this end, the Corporation implements measures including:

- the appointment of an AML/CTF Compliance Officer (being the Group Money Laundering Reporting Officer (**MLRO**)) responsible for ensuring compliance with obligations imposed under AML/CTF laws and regulations;

- providing regular training to employees to ensure they understand their obligations in relation to AML/CTF laws and regulations;
- conducting independent audits to ensure the Corporation's AML/CTF policies and procedures are effective and compliant with legal and regulatory requirements;
- monitoring and conducting manual reviews and reporting suspicious transactions, as required by AML/CTF Law;
- retaining records of transactions, customer identification and verification procedures, and other relevant data to facilitate compliance with applicable AML/CTF laws and regulations; and
- developing, implementing, and maintaining the Corporation's AML/CTF Program, as required by AML/CTF Law.

## Board of Directors

The Corporation's Board of Directors, assisted by the Corporation's Management and Enterprise Risk Committee, is committed to fostering and communicating a corporation-wide culture of compliance. The Board has overall responsibility and oversight for making available appropriate human and information technology resources and ensuring that the Corporation's personnel are empowered to deploy policies and procedures in a manner that effectively addresses money laundering and terrorism financing risks associated with the Corporation's business.

## Personnel

All Corporation employees have a role to play and are required to understand this policy statement and associated compliance obligations that impact on their area of responsibility. The Corporation's commitment to, and the active participation of all employees in, the prevention of money-laundering and terrorism financing activities will contribute to the Corporation's ongoing success.



**JAMES SAWYER**

Acting Chief Risk Officer and MLRO