

## **Anti Money Laundering policy**

**Internal policy adopted pursuant to Legislative Decree 231/07 and the "Provisions regarding organisation, procedures and internal controls aimed at preventing the use of DOMA s.r.l. for the purposes of money laundering and terrorist financing".**

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#### **1. Summary**

The company DOMA S.r.l. (hereinafter also "Doma" or the "Company") is a company incorporated under Italian law with headquarters in Laterina - Pergine Valdarno, in the center of the gold-silver district of Arezzo, which mainly deals with the recovery of precious metals through refining, trade both wholesale and retail or purchase and sale of pure gold, the Company also provides treatment and disposal services for waste from the goldsmith processing cycle.

Doma, as a "professional gold operator", registered in the register kept by the Financial Information Unit (UIF) at the Bank of Italy, is subject to the anti-money laundering law referred to in Legislative Decree no. 231/2007 as amended and integrated by Legislative

Decree 90/2017; is also, as registered with the Body of Financial Agents and Credit Brokers (OAM), required to comply with the provisions of Legislative Decree 92/2017.

The Board of Directors, with a view to improving efficiency and transparency in company management and in full compliance with the Anti Money Laundering Policy, at the time, resolved that the Company should equip itself with an organizational chart (referred to in Annex A), complete and detailed, within which each person has been assigned to different roles based on their personal and specific skills; for this purpose, the role of Anti-Money Laundering Manager is currently held by Mr. Marco Faltoni.

Compliance and consistency with these regulatory provisions, as well as with community and international standards, require Doma to define a "Policy on combating money laundering and terrorist financing" hereinafter Policy, which indicates the concrete choices adopted on the matter of organizational structures, procedures and internal controls for adequate verification and data storage, also in compliance with privacy regulations, aimed at demonstrating the concrete commitment undertaken by the Company in combating these criminal phenomena on a national and international basis.

For this purpose, the Company has adopted the certified Corporate Organizational Model 231, a structured corporate management system (ex Legislative Decree 231/2001), consisting of internal procedures, code of conduct, organizational provisions, management software and forms, with the aim of prevent, control and reduce, through a corporate culture inspired by the principle of legality, the potential risks of committing all those crimes that may arise within the scope of company activity.

## 2.1 KYC policy

Customer due diligence obligations are the tools through which Doma srl acquires and verifies information on the customer's identity, the purpose and expected nature of the relationship or operation, also exercising constant control over the customer's operations .

The Company observes customer due diligence obligations:

- *on the occasion of the establishment of a new relationship, occasional or continuous, arranged by a customer;*
- *on the occasion of a new purchase operation of precious metals (scrap, rods, gold ingots);*
- *when there is a suspicion of money laundering or terrorist financing, regardless of any exception;*
- *when there are doubts about the truthfulness or adequacy of the data previously obtained for the purpose of identifying a customer;*

- *towards customers already acquired, whenever adequate verification is appropriate in consideration of the changed level of risk of money laundering or terrorist financing.*

The methods prescribed for carrying out due diligence activities are:

- *identification and verification in the presence of the identity of the natural person customer, or of the beneficial owner in the case of a legal person customer using a valid identity document among those required by law;*
- *verifies, in the case of a legal person client, the actual existence of the power of representation in the person of the person identified, by consulting the updated Chamber of Commerce Certificate no older than six months;*
- *acquisition and careful evaluation of information on the purpose and expected nature of the ongoing relationship or individual operation;*
- *acquisition and careful evaluation of information on the client's economic and financial situation;*
- *acquisition and careful evaluation of information on the origin of any economic resources and/or funds used in operations or in any case the subject of the business relationship;*
- *verification of the customer's status as a politically exposed person, or of being subject to measures freezing funds or economic resources pursuant to Legislative Decree 109/2007 or to proceedings for crimes in economic/financial/tax/corporate matters;*
- *constant monitoring of the relationship with the customer for its entire duration, keeping the documents, data and information held updated;*
- *Subscription to a specific KYC (Know Your Customers) model, divided by natural person customer and legal person customer with a maximum validity of 18 months.*

In the event that the supplier is a Gold-Buying Operator as identified pursuant to the co. 1, art. 1, of the Legislative Decree. 92/2017:

- *the Company verifies that the supplier is actually registered in the appropriate register "Register of Gold-Buying Operators", as required by art. 3 of the Legislative Decree. 92/2017;*
- *to ensure full traceability of used precious objects and related purchase transactions, the Company, as directed by the co. 2, art. 5 Legislative Decree 92/2017, have the references of the purchase forms for used precious objects delivered that each Gold-Buying Operator must prepare at the time of the purchase transaction;*

- *the supplier in compliance with the provisions of the art. 128 of the T.U.L.P.S. (Consolidated text of the public security law), upon delivery of the goods to Doma, it is ensured that all legal deadlines have passed.*

### 2.1.1. Strengthened verification obligations

Doma applies enhanced customer due diligence measures in the presence of customers or situations that present a higher risk of money laundering or terrorist financing.

These measures are adopted in the case of:

- *customers resident or based in high-risk third countries (anti-money laundering blacklist) or in the case of ongoing relationships, professional services and operations involving high-risk countries;*
- *cross-border correspondent relationships with a responding financial intermediary from a third country based on high geographical risk factors (as per Annex 2 of the provisions of the Bank of Italy regarding customer due diligence);*
- *relationships or operations with customers and their beneficial owners who are politically exposed persons;*
- *customers classified as Trusts, Fiduciary Companies, Foundations;*
- *customers subjected to investigations/investigations and related ones in the last 24 months;*
- *customers subject to UIF reporting in the last 24 months;*
- *for remote Adequate Checks, recognition occurs through the request for a second identity document.*

In the presence of these circumstances Doma srl acquires additional information on the customer and the beneficial owner, delves into the elements underlying the assessments on the purpose and nature of the relationship, intensifies the frequency of application of the procedures aimed at guaranteeing constant control during the ongoing relationship.

## 2.2 Customer profiling

Doma adopts a risk-based approach to define the intensity and extent of due diligence obligations, which are then modulated according to the degree of money laundering and terrorist financing risk associated with each customer. For this purpose, the Company draws up an evaluation model aimed at defining the risk profile attributed to each customer, based on various factors relating to the customer's characteristics, geographical scope of activity and origin of the precious metals, specificity of

the operation or ongoing relationship.

As a result of the profiling, each customer is placed in a specific pre-determined risk class:

- *not significant risk*
- *not very significant*
- *quite significant*
- *very significant*

## 2.3 Identification of the beneficial owner of the operation

In the case of a customer other than a natural person, Doma proceeds to identify the beneficial owner, who must coincide with the natural person or natural persons to whom legal representation or direct or indirect ownership of the entity or related control is attributed.

Doma fulfills this obligation by transposing and verifying the updated Chamber of Commerce Certificate (no older than six months), ensuring:

- *holding a stake exceeding 25% of the client's capital by a natural person;*
- *possession of a percentage of shareholdings exceeding 25% of the client's capital, through subsidiary, trust companies;*
- *if it is still not possible to unequivocally identify one or more owners, we proceed to identify the persons holding administrative or management powers of the company.*

## 2.4 Abstention obligations

Doma refrains from establishing, carrying out or continuing the relationship or operations in the event of objective impossibility to carry out the Customer Due Diligence or where there is a suspicion that there is a relationship with money laundering or terrorist financing .

In these cases, Doma evaluates whether, from the information in its possession, it is appropriate to report a suspicious transaction to the UIF as required by art. 35 of Legislative Decree no. 231/2007.

Furthermore, if elements of high risk emerge from further assessments or following the Due Diligence activity, the Company reserves the right to limit or terminate the business relationship with the customer.

## 2.5 Reports of suspicious transactions

Doma srl has established procedures and processes to monitor, identify and report suspicious activities in times and ways consistent with legal requirements.

In case of reasonable grounds for suspicion of money laundering operations, the Company, before carrying out the operation, sends electronically to the Financial Information Unit of the Bank of Italy, via the INFOSTAT-UIF internet portal, the Report of Suspicious Operation – S.O.S.

Doma, to report Suspicious Transactions, has been duly authorized on the INFOSTAT-UIF portal.

The management of reports to the Financial Information Unit is carried out by Mrs. Barbara Polvani.

## 2.6 Data Protection and ICT Security

The Company retains the documents and information it has acquired to fulfill its customer due diligence obligations so that its operations can be reconstructed, as well as to facilitate the performance of control functions, including inspections, of the Bank of Italy and the UIF. With regard to customer due diligence obligations, the Company retains the analogue copy of the requested documents for a period of ten years from the end of the continuous relationship, specifically the customer file is retained consisting of (Copy of the customer identity, Risk Assessment Model, Customer Due Diligence Form, Contract between the parties, updated Customer Chamber of Commerce Certificate, correspondence, further documentation).

To this end, Doma srl, in the pursuit of document digitization and bureaucratic simplification, also makes use of a digital preservation archive, DocFly-Substitute Conservation, an Aruba.it certified service, which meets high standards of reliability and security in digital preservation.

In the implementation of the European legislation EU Regulation 2016/679 "GDPR", on the subject of privacy, it implements a careful strategy for securing information through its own well-built hardware infrastructure (more specifically referred to in Annex B ) and cutting-edge software procedures specifically developed internally by the Data Processing Center; using top quality systems and peripherals, such as Microsoft, Apple, Palo Alto Firewall, Eset Business, Ubiquiti Video Surveillance and Wi-Fi, and VPN technology with SSL certificate for remote connections.

This high level of security is achieved through a structured backup system that is always active, which is based on the asynchronous replication mode of Veeam® Availability Suite, which creates a complete copy of the Doma infrastructure in two servers located in the two "Corporate Vaults" (therefore the most systematically monitored and protected places), the copies are created with encryption support to avoid data leaks in the event of a complete theft of the server.

The "asynchronous replication" configuration of Veeam Backup & Replication allows Doma to have critical machines redundant with a programmed time differential, in order to accelerate the recovery of systems from damage caused by malicious software (see ramsoware, cryptoloker) as well as having all advanced monitoring, reporting and capacity planning features.

Furthermore, an ICT security system is also provided for less important data, since it is still sensitive data, through encryption systems with passwords and 2040 RSA algorithms, such as to reduce any risk of leaks to zero if these devices are mistakenly lost.

External connections with users are instead conveyed through VPN (VIRTUAL PRIVATE NETWORK) with RSA 2048 encryption certificate, with symmetric key and additional password for decrypting the certificate.

External IT media such as USB sticks, external disks and mass storage media are subject to rules that do not allow them to be used by users.

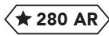
## **2.7 Review and update of the Policy**

Doma srl reviews the Policy Model at least on an annual basis, updating and revising it if and where necessary.

## **2.8 Staff training**

The Company works towards careful training and training of staff on the obligations established by the anti-money laundering legislation through the establishment of internal and external training courses.



**Sede legale**

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## 2.9 Doma, responsible company

Doma Srl adopts high professional standards for responsible and sustainable business conduct, applying the best possible technologies to minimize the impact of its production activity on the surrounding environment.

The Company, in line with the key principles launched by the World Gold Council, and with the LBMA Responsible Gold Guidance Guidelines, guarantees full transparency throughout the supply chain, verifying that its international commercial partners adopt extraction techniques with non-invasive methodologies, that is, without the exploitation of the most vulnerable people, who reduce the use of chemical or explosive agents, who in full respect of human rights are in harmony and collaboration with the environment and the local communities involved.

### **DOMA SRL**

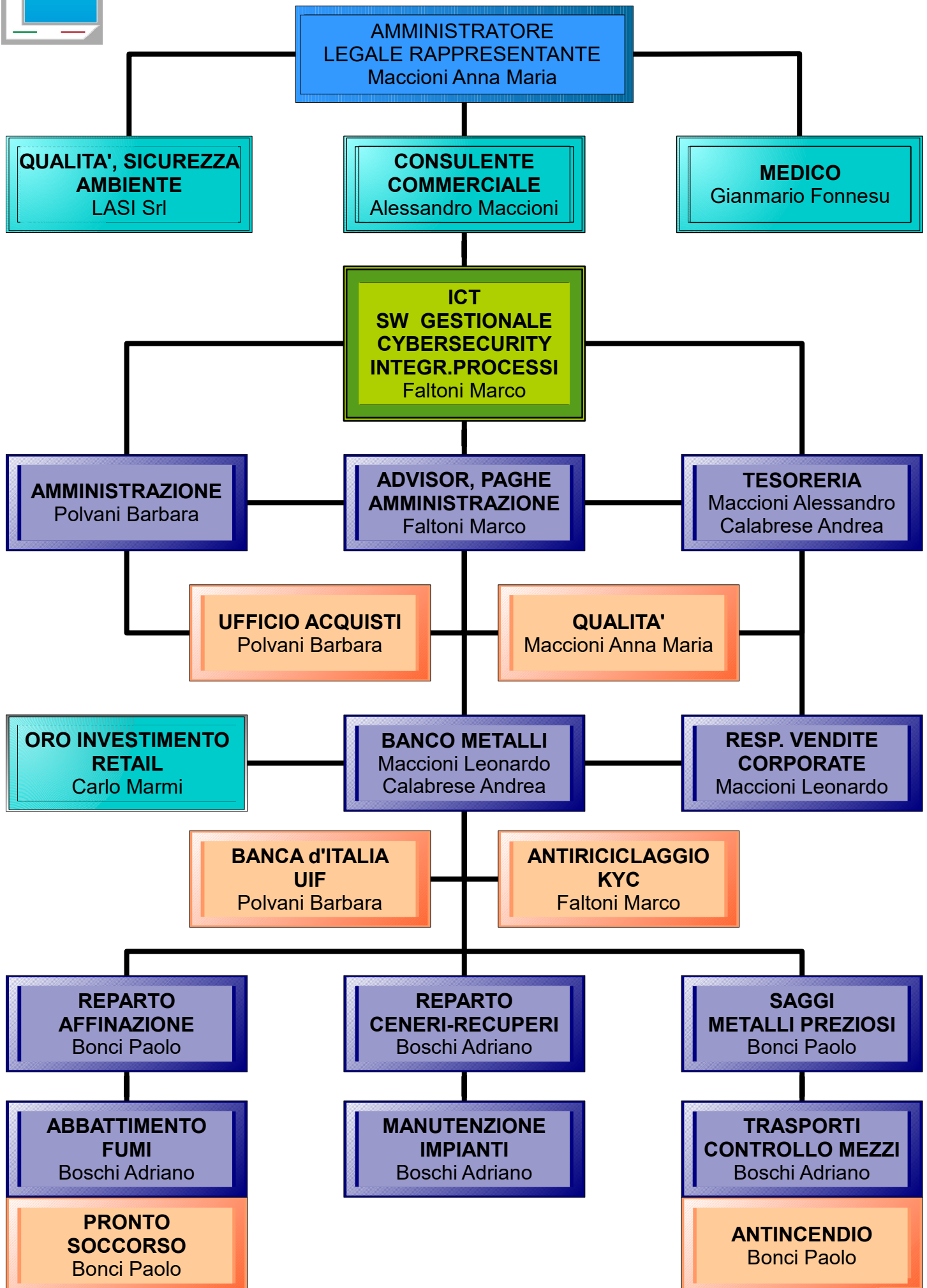
*Anna Maria Maccioni*

*Legal Representative*



# ORGANIGRAMMA DOMA S.r.l.

Mod. DM-013  
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## Allegato B

