



Anti-Money Laundering & Know Your Counterparty (KYC) Policy

This policy and procedure confirms Global Trend Handcraft Co., Ltd. (GT)'s commitment to prevent money-laundering and the financing of terrorism in GT's business practices and transactions. Money laundering is the process of disguising the financial proceeds of crime to conceal their illegal origin. The financing of terrorism is any kind of financial support to those who attempt to encourage, plan or engage in terrorism.

GT has established Know Your Counterparty (KYC) procedures to combat money laundering and the financing of terrorism. This policy and procedure allows GT to identify every organisation that GT deals with, to understand the legitimacy of GT business relationships and to identify and react to unusual or suspicious activity.

The Management Representative of GT is responsible for development and implementation of this policy and procedure, and GT commits to review this policy and procedure every year.

To support this policy and procedure, GT has developed a KYC form which GT sends to all our counterparties (suppliers and customers) to collect relevant business information to identify risks of money-laundering. GT requires this form to be completed for all existing and new counterparties of gold, silver, PGM, diamonds, coloured gemstones or jewelry products containing these materials.

By collecting and reviewing the information in completed KYC forms, GT commits to :

1. Establish the identity of counterparties by checking government-issued identification.
2. During the initial stage of business engagement, check that the counterparties are not considered high-risk (this means checking whether counterparties are based in FATF high-risk jurisdictions or international (UN) sanctions lists, or if they source from conflict-affected and high-risk areas (CAHRAs)).
3. Maintain an understanding of the nature and legitimacy of all counterparties' businesses.
4. Maintain KYC records for at least five years.
5. Maintain records of all single or linked cash (or cash-like) transactions equal to or above 10,000 USD/EUR.
6. Monitor transactions for unusual or suspicious activity and report suspicions of money laundering or finance of terrorism to Anti-Money Laundering Office (AMLO) as applicable.
7. Upon receiving reports of suspicious activities or triggered by risks or applicable law, Management Representative shall establish the beneficial ownership and principals of the counterparty, check them against international and government watch lists, and report to appropriate government authorities.
8. Follow up actively with counterparty on missing information that is legally required.
9. Conduct regular trainings to ensure personnel involved are familiar with this policy and procedure, including continuous monitoring and appropriate reporting of unusual or suspicious activity.
10. Conduct annual reviews and documentation to ascertain if this policy and procedure works adequately.
11. Help prevent money-laundering within the jewelry industry and to enhance the integrity of the industry.
12. Deal only with legitimate entities and ensure the legitimacy of all transactions and thereby protecting business.

If counterparties are considered high-risk for any reason (for example named on a sanctions list or engaging in unusual activity) GT may:

1. Cease trading with the counterparty
2. Identify the beneficial owners of the counterparty and check whether the beneficial owners are on any international or government issued watch list.
3. Make an on-site visit to the high-risk counterparty.
4. Report the transactions for unusual or suspicious activity immediately to Anti-Money Laundering Office (AMLO) by choosing one of the methods as follows.
 - 4.1 Directly submit the documents to the officers at the AMLO;
 - 4.2 Send a registered mail to the AMLO; or
 - 4.3 Submit documents through the AERS system of the AMLO.

Note:

- (1) Reporting cash receive of 2 million Baht above (Form: Popor 1-05-2).
- (2) Reporting transactions that are suspected of being related to money laundering without a minimum limit, (Form: Popor 1-05-10).



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The KYC Questionnaire requires that counterparties to provide the following information:

1. Company's legal name and address and any other trade names
2. Nature of the business
3. How the business is structured
4. Government Identification Number and date/place of registration
5. Beneficial Owners including ownership percentage and each date of birth, if applicable
6. Key Persons, Title(s) and each date of birth

The beneficial owner's identification is only required when the counterparty is considered high-risk on account of unusual transactions or that the counterparty operates in a FATF high-risk jurisdiction or sanction list, or it is required by law.

A new KYC form will only be needed when any of the previous details of counterparty has changed.

As part of the ongoing KYC due diligence and monitoring, GT will conduct the following reviews of counterparties annually:

1. Full review against International Sanctions List and FATF High-Risk Jurisdictions
2. Full review against Conflict-Affected and High-Risk Areas (CAHRAs)
3. Full review against cases of unusual or suspicious activity, and whether they have been properly documented and appropriately reported.
4. Review beneficial owners of high-risk counterparty against international or government issued watch list.

For the reporting of suspicious activities or any questions regarding this policy and procedure, please contact Management Representative +66(2) 127 0077 extension 101, settha.w@gthandcraft.com

Best Regards
GLOBAL TREND HANDCRAFT CO., LTD.

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