

# **Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) Policy**

**Effective Date: 30/05/2025**

## **Our Commitment to Your Security**

At **GLOBAL GOLD BANK**, we prioritize your financial security and trust. We are dedicated to ensuring the safety and legality of every transaction, whether through **overseas money transfers** or **digital cryptocurrency exchange services**. Our **Anti-Money Laundering (AML)** and **Counter-Terrorism Financing (CTF)** policies are specifically designed to protect you and the broader community from illicit activities such as money laundering and terrorism financing, and to comply with all relevant legal regulations.

## **Key Information for Your Transactions**

### **1. Identity Verification**

To protect both you and our services, we require **identity verification** before providing either money transfer or cryptocurrency exchange services. This helps us ensure the legitimacy of all transactions.

#### **Documents You May Need to Provide:**

- **Government-Issued Photo ID:** Passport, national ID card, or driver's license.
- **Proof of Address:** Recent utility bills, bank statements, or government-issued letters.
- **Additional Documentation:** In certain circumstances, we may request further information to verify your identity and the legitimacy of your transactions.

This process ensures a smooth and secure experience when transacting with us.

### **2. Enhanced Security Measures for High-Risk Transactions**

For transactions that involve higher risks—such as **large amounts**, transfers to **high-risk regions**, or **cryptocurrency exchanges**—we may require additional verification to comply with AML/CTF laws.

#### **Possible Additional Requests:**

- **Source of Funds:** Documentation of the origin of funds or cryptocurrency.
- **Purpose of Transaction:** Clarification of the reason for the transfer or exchange.
- **Beneficiary Details:** Information about the recipient or the recipient's cryptocurrency wallet address.

These additional measures ensure compliance with international regulations and the protection of your funds.

### **3. Monitoring for Unusual Activity**

We continuously monitor all transactions, including overseas money transfers and cryptocurrency exchanges, for suspicious or irregular activities.

#### **Examples of Unusual Activity:**

- Transactions made at odd hours or from high-risk locations.
- Multiple transactions to different beneficiaries or cryptocurrency wallets within a short time.
- Third-party payments made on your behalf without prior notice.

If any suspicious activity is detected, we may contact you for verification or additional information to ensure your account remains secure.

### **4. Privacy and Data Protection**

Your privacy is of utmost importance to us. We take significant steps to safeguard your personal and financial data.

#### **Our Commitments:**

- **Compliance with Data Protection Laws:** We comply with the Privacy Act 1988 and other relevant privacy laws.
- **Secure Storage:** We implement robust security measures to protect all personal information.
- **Limited Sharing:** Your data is shared only when necessary for compliance or as required by law.

We use your information solely for the purpose of providing services and meeting our regulatory obligations.

### **5. Restricted Services**

For your safety and to comply with legal requirements, we cannot provide services to certain individuals or entities.

#### **We Do Not Serve:**

- Individuals or organizations involved in illegal activities.
- Customers who refuse to provide necessary identification or documentation.
- Unauthorized representatives acting without proper documentation.

- Individuals or entities listed under international sanctions or embargoes.
- **Politically Exposed Persons (PEPs)**, who pose a higher risk of exposure to corruption or other illicit activities.

These restrictions are in place to protect the integrity of our services and ensure compliance with global regulations.

## 6. Sanctions and PEP Screening

We conduct **sanctions** and **PEP (Politically Exposed Persons)** screening for every customer, regardless of whether they are using our **money transfer** or **cryptocurrency exchange** services.

### Screening Process Includes:

- **Sanctions Lists:** We cross-check all customers and transactions against global sanctions lists to prevent illegal or prohibited activity.
- **PEP Identification:** We screen for individuals who are politically exposed, applying appropriate measures to mitigate risk.

These screenings are vital for ensuring that we do not facilitate illegal transactions or inadvertently assist sanctioned individuals or entities.

## 7. Ongoing Monitoring and Risk Management

We actively monitor all accounts and transactions to identify potential risks in real time. This includes monitoring **overseas remittance transactions** and **digital currency exchanges**.

### Continuous Oversight Includes:

- Regular reviews of transaction patterns for unusual activity.
- Use of automated technology to enhance monitoring capabilities, especially for cryptocurrency exchanges.

This enables us to act promptly if any suspicious activity is detected.

## 8. Risk-Based Approach

We assess the risk level of each transaction to determine if additional verification is required. High-risk factors include **transaction size**, **geographical location**, and **cryptocurrency usage patterns**.

### Factors Considered:

- **Transaction Amounts:** Larger or frequent transfers or exchanges may require further scrutiny.

- **Geographic Regions:** Transfers to or from high-risk countries or regions.
- **Cryptocurrency Transactions:** Unusual transactions involving cryptocurrencies may trigger additional verification steps.

While this may cause slight delays in processing, it helps ensure that your funds or digital assets are handled securely and in compliance with legal requirements.

## **9. Your Responsibilities**

To ensure that we can provide you with optimal service and protect your account, please make sure to:

- Provide accurate and complete information when requested.
- Respond promptly to any follow-up requests for additional information.
- Use our services solely for legal, legitimate purposes.

Failure to comply with these responsibilities may result in delays or an inability to process transactions.

## **10. Cooperation with Compliance Procedures**

By using our services, you agree to undergo necessary checks, provide required documentation, and accept communication from us regarding your transactions. Your full cooperation is essential in helping us meet regulatory obligations and ensure the integrity of our services.

## **11. Communication and Support**

Our team is here to assist you and respond to any questions or concerns regarding our policies or your transactions.

### **Contact Us If:**

- You have any questions about our AML/CTF policies or need clarification.
- You notice unusual activity in your account.
- You require assistance providing documentation.

### **Contact Information:**

- **Email:** [compliance@globalgoldbank.org](mailto:compliance@globalgoldbank.org)

We are here to help ensure your transactions are safe and secure.

## **12. Policy Updates**

We may revise this policy periodically to reflect changes in regulations or our internal practices.

## Stay Informed:

- Any updates will be posted on our website. We recommend that you review this policy regularly to stay up-to-date.
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## Why This Matters

Our **AML** and **CTF** policies are more than just legal obligations—they are an essential part of our commitment to providing secure, reliable services for both **overseas money transfers** and **digital cryptocurrency exchanges**. By adhering to these policies, we aim to:

- Prevent illegal activities such as money laundering and terrorism financing.
- Ensure full legal compliance and protect both you and the broader financial system.
- Build a secure and trustworthy relationship with you.

## Thank You for Your Trust

We value your business and appreciate your understanding and cooperation in helping us maintain a secure and legally compliant service. Our goal is to offer the highest level of service while safeguarding the integrity of every transaction, whether through traditional remittances or digital asset exchanges.

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## Contact Information

For any questions or additional clarification about our policies, please contact us.

**Email:** [compliance@sgcx.io](mailto:compliance@sgcx.io)

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