

Anti-Money Laundering and Counter-Terrorism Financing Policy Statement

Policy Statement

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 (**ML**) and terrorism financing (**TF**) risks that it may reasonably face in connection with providing designated services to its customers.

Risk-based approach

The Corporation recognises that ML/TF risks vary based on several factors, such as customer type, products and services, and jurisdictions. Therefore, the AML/CTF Program sets out a risk-based approach to identify, mitigate and manage ML/TF risks, which is underpinned and informed by ML/TF risk assessments of ML/TF risks related to customer types, designated services, channels, jurisdictions, employees.

Compliance with regulatory requirements

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

- developing, implementing, and maintaining the AML/CTF Program;
- appointing an AML/CTF Compliance Officer (**AMLCO**) who is responsible for ensuring compliance with the AML/CTF Laws;
- board and senior management approval and oversight of the AML/CTF Program;
- applying employee due diligence and providing regular AML/CTF risk awareness training to employees;
- conducting independent reviews of the effectiveness of its AML/CTF Program;
- Incorporating feedback and guidance on ML/TF risks from AUSTRAC into the AML/CTF Program;

- applying Applicable Customer Identification Procedures (**ACIP**) to collect and verify Know Your Customer (**KYC**) information about customers;
- applying ongoing customer due diligence (**OCDD**) to regularly review, update and maintain KYC information about customers;
- maintaining a Transaction Monitoring Program (**TMP**) to identify suspicious transactions;
- reporting to AUSTRAC, including international funds transaction instructions (**IFTIs**) suspicious matters reports (**SMRs**) and an annual compliance report, as required by AML/CTF Laws;
- applying enhanced customer due diligence (**ECDD**) procedures on high-risk customers and transactions;
- enrolling with AUSTRAC and reporting any changes to the enrolment details; and
- record-keeping of the AML/CTF Program, transactions, customer identification and verification procedures, and other relevant information, as required by AML/CTF Laws.

Board of Directors

The Corporation's Board of Directors, assisted by the Corporation's Management, Audit and Risk Management Committee (**ARMC**), and Enterprise Risk Committee (**ERC**), is committed to fostering and communicating a corporation-wide culture of compliance. The Board has overall responsibility and oversight for making available appropriate resources and ensuring that the Corporation's personnel are empowered to deploy AML/CTF policies and procedures in a manner that effectively addresses ML/TF 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 ML/TF activities will contribute to the Corporation's ongoing success.



GRAEME SEED

General Manager Risk and Compliance,
AML/CTF Compliance Officer (AMLCO)