

Subject:

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Anti-Money Laundering (AML) Policy and Procedures – East Gate Real Estate LLC

Introduction and Policy Statement

East Gate Real Estate LLC is committed to fully complying with UAE anti-money laundering and counter-terrorism financing (AML/CFT) laws and regulations. This AML Policy and Procedure document is designed for our one-employee real estate brokerage in Dubai and aligns with Federal Decree-Law No. (20) of 2018 and its implementing Cabinet Decision No. (10) of 2019, as well as guidance from the UAE Financial Intelligence Unit (FIU) and Dubai Land Department (DLD). The purpose of this policy is to prevent our services from being used for money laundering or terrorist financing, and to ensure we identify and mitigate risks associated with high-value transactions (above AED 55,000) and international clients. All required measures – including Customer Due Diligence, ongoing monitoring, record-keeping, suspicious transaction reporting, internal controls, and training – are implemented in a manner that is clear and feasible for a minimal staff environment. This policy applies to all activities of East Gate Real Estate LLC and will be reviewed and updated regularly to remain compliant with evolving regulations and guidance.

Roles and Responsibilities

Senior Management / Owner: The owner (or senior management) of East Gate Real Estate LLC holds ultimate responsibility for AML compliance. They are committed to fostering a culture of compliance, providing adequate resources for AML/CFT measures, and ensuring that a qualified

Money Laundering Reporting Officer (MLRO) is appointed and empowered. Given our small size, the owner may also serve as the MLRO. Senior management is accountable for approving this AML policy and any significant updates, and for overseeing that all regulatory obligations are met.

Money Laundering Reporting Officer (MLRO): The MLRO is the designated compliance officer responsible for implementing and overseeing the AML/CFT program. In our company, which has only one employee, this individual serves as both the operational staff and the MLRO. The MLRO's duties include:

- Developing, implementing, and maintaining AML policies and procedures on a day-to-day basis .
- Serving as the point of contact with regulatory authorities (FIU, DLD, and Ministry of Economy) on AML/CFT matters. This includes ensuring the firm's registration with the FIU's goAML reporting system as required by law .
- Reviewing customer onboarding and transactions for compliance with CDD/EDD requirements, and approving higher-risk relationships (since in a single-person operation, the MLRO effectively self-approves after thorough review).
- Receiving internal reports of any suspicious activity (if there were additional staff, they would report to the MLRO) and investigating these reports confidentially.
- Filing Suspicious Transaction Reports (STRs) or Suspicious Activity Reports (SARs) to the FIU without delay once suspicion is determined . The MLRO uses the goAML platform to submit STRs and any other required reports (e.g. cash transaction reports) promptly and with sufficient detail.
- Ensuring no "tipping-off" occurs – not revealing to the client or any unauthorized person that a suspicion has been reported .
- Maintaining all AML records and documentation (CDD files, monitoring logs, STR filings, training records) in an organized manner, and making them available to authorities upon request .
- Staying up-to-date with UAE AML laws, DLD/FIU guidance, and international best practices, and updating internal procedures and training materials accordingly. The MLRO must have adequate knowledge of current reporting requirements (for example, how to report large cash or virtual asset transactions above AED 55,000 to FIU) .

- Coordinating periodic independent reviews or audits of the AML program (as required by regulators or as necessary to ensure effectiveness), given the lack of other internal staff to provide separate oversight.

All Employees: As a one-person company, the MLRO is also the sole employee. (If additional employees are hired in the future, this section will apply to them.) All employees have a duty to follow the AML policies and procedures in their daily work. They must conduct required customer due diligence measures, remain vigilant for signs of money laundering or terrorist financing, and immediately report any unusual or suspicious activities to the MLRO. Employees are expected to attend all required training sessions and to consult the MLRO or the AML policy document whenever they have compliance questions. No employee should ever knowingly assist in or turn a blind eye to potentially illicit transactions. Compliance with AML/CFT requirements is a condition of employment, and failure to adhere to this policy can result in disciplinary action and regulatory penalties.

Customer Due Diligence (CDD)

East Gate Real Estate LLC will perform thorough Customer Due Diligence (CDD) on all clients (buyers, sellers, or any party for whom we facilitate a property transaction), especially for any transaction that equals or exceeds AED 55,000 in value. In accordance with UAE law and best practices, the CDD process includes the following measures:

- **Identify the Customer and Verify Identity:** We must obtain and verify the true identity of each customer using reliable, independent source documents. For individuals, this involves obtaining an official photo identification (such as a passport, Emirates ID, or other government-issued ID) and verifying details like full name, date of birth, nationality, and identification number. For corporate or legal entity clients, we collect certified copies of incorporation documents (trade license, certificate of incorporation), information on directors, and identification of the Ultimate Beneficial Owners (UBOs) who ultimately own or control the entity. All identification information provided will be checked for

authenticity (e.g. verifying document security features or using approved online verification systems where available).

- **Understand the Purpose and Intended Nature of the Business Relationship:** We gather information from the customer about the nature of the proposed real estate transaction and the reason behind it. This includes understanding whether the client is purchasing for personal use, investment, business purposes, or on behalf of another party. We also inquire about the source of funds for the property purchase (e.g. savings, salary, business income, loan, etc.) and, where applicable, the source of wealth of the client (how they accumulated their overall wealth). Increased scrutiny is applied to the source of funds for high-value property deals to ensure they come from legitimate sources. The brokerage will not accept cash payments exceeding the legal threshold (AED 55,000) in a single transaction, in line with UAE regulations restricting large cash deals in real estate.
- **Customer and Beneficial Owner Screening:** As part of CDD, we screen each customer (and any beneficial owner or person acting on behalf of the customer) against relevant sanctions lists and watch-lists. This includes the United Nations Security Council sanctions list, UAE local terrorist/terrorism financing lists, and any other applicable international sanctions lists. Screening is done at onboarding and again at key stages (e.g. before transaction execution) to ensure no client is a sanctioned person or entity. We also check whether the customer is a Politically Exposed Person (PEP) – meaning an individual who holds or has held a high public office, or their immediate family and close associates – as PEPs are considered higher-risk for potential money laundering. If a potential match to a sanctions list or other high-risk category is found, the MLRO will evaluate and decide whether to proceed with the relationship (subject to Enhanced Due Diligence) or terminate the engagement. No business will be conducted with any person or organization that is sanctioned or prohibited by UAE authorities or UN resolutions.
- **Risk Assessment and Profiling:** The company adopts a risk-based approach in applying CDD. Based on information collected, the MLRO/employee will assess the customer's risk profile (low, normal, or high risk). Factors influencing risk assessment include the customer's nationality and country of residence (e.g. if they are from a jurisdiction with weak AML controls or under international sanctions, risk is higher), the type and value of the transaction (very large or complex transactions may pose higher risk), the payment method (cash and virtual assets pose higher risk, whereas regulated bank transfers are safer), and whether the customer is a PEP or has negative media/red flags in their background. This risk assessment will determine the level of due diligence required – high-risk cases will trigger Enhanced Due Diligence (EDD) as described in the next section. Low-risk scenarios may allow simplified measures where permitted by law, but as a general rule, real estate transactions in Dubai are significant enough that standard CDD (at a minimum) is always performed.

- **Ongoing Monitoring of the Relationship:** CDD is not a one-time process at onboarding – if the business relationship extends over time (for example, if a client engages in multiple transactions or a long closing period), we will conduct ongoing monitoring (see “Ongoing Monitoring” section below). This includes keeping client information updated and scrutinizing transactions to ensure they are consistent with the client’s profile and source of funds provided . Any inconsistencies or suspicious changes in customer behavior will prompt a review by the MLRO and potentially an internal suspicious activity report.

We will document all CDD information obtained (copies of IDs, forms, questionnaires, risk assessment results, etc.) and secure them as part of our record-keeping (see Record Keeping section). If any aspect of required CDD cannot be completed satisfactorily, such as inability to verify the client’s identity or source of funds, the company will not establish or continue the business relationship or carry out the transaction until the issues are resolved. In certain cases, the MLRO may decide to file a Suspicious Transaction Report if the attempt to obtain information itself raises suspicion (for example, if the client refuses to provide standard information or provides obviously fake documents), rather than tip off the client of our concerns .

Enhanced Due Diligence (EDD)

For customers or transactions that are deemed high-risk, East Gate Real Estate LLC will apply Enhanced Due Diligence (EDD) measures, above and beyond the standard CDD. EDD is required by law in situations with higher risk of money laundering or terrorist financing – this typically includes cases where the client is a Politically Exposed Person (PEP), when the client is from or connected to a high-risk jurisdiction (countries known for widespread corruption, terrorism, sanctions, or poor AML controls), when a transaction is unusually large or complex, or involves non-resident or international clients with opaque backgrounds. Additionally, any transaction that involves significant cash or virtual asset payments (at or above AED 55,000) will be treated as high-risk and subject to EDD due to the greater money laundering risk in such cases .

When conducting Enhanced Due Diligence, the company will take steps including, but not limited to:

- **Obtaining Additional Identification or Verification Documents:** We will require extra documents to verify identity or residence (e.g. multiple forms of ID, proof of address, references from a reputable bank or regulated person, etc.) and may independently verify the information provided (for instance, contacting the issuing authorities or using third-party verification services). We also ensure we have identified all beneficial owners and controllers if the client is an entity or if the customer is acting on someone else's behalf, as mandated by UAE regulations .
- **In-depth Inquiry into Source of Funds and Wealth:** For high-risk clients, especially PEPs or those with large wealth, we gather more detailed information and evidence about how they acquired the funds for the property purchase and their overall wealth. This could include bank statements, investment portfolio statements, salary certificates, property sale agreements, business financials, or other documentation that substantiates the legitimacy of their funds. If the money comes from a third party (not the client's own account), we will also perform due diligence on that third party. Enhanced scrutiny of source of funds is a critical component of EDD . The MLRO must be satisfied that the funds are not the proceeds of crime before proceeding.
- **Senior Management Approval:** Establishing or continuing a business relationship with a high-risk customer (such as a PEP or a high-risk foreign client) will require approval from senior management. Given our one-person operation, this means the MLRO (who in our structure is also the senior manager/owner) must consciously approve the decision and document the rationale for accepting the risk. This approval step ensures that high-risk cases are acknowledged at the highest level of the company and that appropriate risk-mitigation measures are in place.
- **More Frequent Monitoring and Review:** High-risk relationships and transactions will be subject to enhanced monitoring (see Ongoing Monitoring section). The MLRO will review such cases more frequently, perhaps at every stage of the transaction process, and will update CDD information more regularly. For example, if a property transaction is delayed over several months, the MLRO may re-confirm the client's information or check for any new adverse information before closing. Any new red flags or discrepancies that arise during the course of the transaction will trigger a re-evaluation of the risk and potentially an STR filing.
- **Consultation of External Databases/Resources:** The MLRO may utilize external databases, commercial intelligence tools, or consult public records to gather more information on a high-risk client. This might include running the client's name through specialized risk intelligence databases for any negative media, checking litigation or criminal records in relevant jurisdictions, or seeking information from the UAE FIU or regulatory guidance on handling certain high-risk scenarios.

All EDD measures taken must be clearly documented in the client's file, along with a justification of why the client or transaction was categorized as high-risk and the outcome of the enhanced due diligence (e.g., decision to proceed or not, any conditions imposed, etc.). The combination of these EDD steps ensures that East Gate Real Estate LLC exercises a higher level of scrutiny for high-risk customers, consistent with regulatory expectations that more rigorous measures be applied in such cases. If at the end of the EDD process the risk is deemed too high to manage, the company reserves the right to refuse or terminate the business relationship in order to remain compliant with AML/CFT obligations.

Ongoing Monitoring

Performing due diligence is not a one-time event but an ongoing obligation. East Gate Real Estate LLC will conduct ongoing monitoring of business relationships and transactions to detect and report any suspicious activity, and to ensure that transactions remain consistent with the customer's profile and source of funds as understood during CDD. Given our brokerage's small size and the nature of real estate transactions, ongoing monitoring will be applied in the following ways:

- **Transaction Monitoring:** The MLRO will closely monitor the progress of each property transaction facilitated by the company. This includes observing the flow of funds in the transaction. For example, if the deal involves a down payment, installments, or a final settlement amount, the MLRO will verify that payments are coming from the customer's declared bank account or legitimate channels. If we notice any unexpected payments – such as funds coming from a third-party account not disclosed earlier, multiple split payments structured to evade thresholds, or a sudden switch to cash or virtual assets – these will be flagged for investigation. Any transaction that is unusually large, complex, or lacks economic justification will likewise be scrutinized. Unusual patterns or deviations from the expected transaction structure are considered red flags and will prompt the MLRO to perform deeper checks or request clarification from the client, and possibly file an STR if no satisfactory explanation is provided.

- **Ongoing Due Diligence Updates:** For any client with whom we have an ongoing relationship (for example, a repeat investor client who buys/sells multiple properties over time, or a long-term project involving staged payments), the company will update CDD information at appropriate intervals. This may include requesting updated identification documents upon expiry, refreshing sanctions/PEP screening before each new transaction, and asking if there have been changes in ownership or control for entity clients. We will also periodically ask high-risk clients if their source of funds or circumstances have changed. At minimum, a fresh review of the client profile will be done for each new property transaction, even if the client engaged us in the past, to ensure our information and risk assessment remain current.
- **Monitoring for Regulatory Changes and Guidance:** Ongoing monitoring is not limited to client activity; it also means staying alert to any changes in laws or guidance that might affect how we handle certain customers or transactions. The MLRO will monitor communications from DLD, the Ministry of Economy, the Central Bank, and the UAE FIU for any updates (for example, new high-risk country lists, updated sanctions, new typologies or schemes to watch for). Any relevant updates will be integrated into our procedures immediately. For instance, if authorities issue a warning about a certain money laundering trend in real estate (such as use of third-party company funding or new patterns in illicit use of virtual assets for property purchases), the MLRO will incorporate checks for those patterns into our monitoring process.
- **Documentation of Monitoring Efforts:** The MLRO will maintain logs or files noting the monitoring actions taken for each case. This can be as simple as a checklist or diary entry in the client's file indicating that transaction stages were reviewed on certain dates and any observations made. If a transaction proceeds without issue and closes normally, the MLRO will record that no irregularities were observed in the course of the deal. If any potential red flag was examined and resolved, the MLRO will document what the issue was and how it was cleared (e.g., "Queried source of additional \$100,000 wire transfer – client provided bank letter confirming loan"). Such documentation demonstrates that ongoing monitoring is active and allows authorities or auditors to later verify that we took appropriate steps.

Through vigilant ongoing monitoring, East Gate Real Estate LLC aims to spot suspicious activities early and ensure that all transactions align with what we know of our customers. This process is especially important given the involvement of high-value transactions and international clients in our business model – we recognize that such factors can increase risk, and we remain alert throughout the engagement, not just at onboarding.

Record Keeping

Proper record-keeping is a cornerstone of AML compliance. East Gate Real Estate LLC will maintain detailed records of all documents and information collected or generated as part of our AML program, and retain them for a minimum of five (5) years following the completion of the transaction or the end of the business relationship, whichever is later. These records will be kept in a secure manner (in locked file storage for physical documents and/or encrypted digital format for electronic records) so that they remain confidential and are protected from unauthorized access or tampering. They will also be organized such that they can be readily retrieved and provided to the competent authorities upon official request.

The types of records we shall maintain include:

- **Customer Identification and Verification Records:** Copies of all documents obtained during the CDD process for each customer. This includes copies of passports, IDs, driver's licenses, or any official identification documents, as well as corporate documents (licenses, certificates of incorporation, etc.) and records of UBO identification for entity clients. We also keep any additional documentation gathered for enhanced due diligence (e.g. source of funds proofs, reference letters, etc.). These records evidence how we verified the customer's identity and assessed their risk.
- **Customer Due Diligence Forms and Risk Assessments:** Any internal forms or checklists used to record the CDD steps taken, risk classification of the client, and the rationale for any decisions (such as why a client was classified as high-risk or why certain verification steps were deferred or enhanced). This may include the client risk assessment scoring sheets, if used, and notes from the MLRO regarding the acceptance/approval of the client.
- **Transaction Records:** Full details of each property transaction the company facilitates. For a brokerage, this may include copies of sale and purchase agreements, memoranda of understanding (MOUs), property title deed details (once issued), payment receipts or confirmations (including bank transfer records, deposit receipts, etc.), and correspondence related to the transaction. If any funds were handled by the brokerage (e.g. escrow deposits or commission payments), those financial records are kept as well. Essentially, we keep a paper trail of the entire transaction to show what property was involved, who the parties were, and how and when payments were made.

- **Internal and External STR/SAR Records:** We will retain copies of any Suspicious Transaction Reports (STRs) or Suspicious Activity Reports we file with the FIU (including the submissions made via the goAML system) as well as any internal reports of suspicion and the MLRO's analysis or decision related to those. The fact of an STR filing will be kept confidential in our files, but it's important for us to have a record that we filed it, along with the date of filing and reference number. Likewise, if we received any communication from the FIU or regulators about a report or requesting additional information, those correspondences will be retained.
- **Training Records:** Documentation of AML training attended by the MLRO/employee (and any future staff) will be maintained. This includes training materials, dates of training sessions, topics covered, and names of attendees. For a one-person company, this serves as evidence that the MLRO has kept up with training requirements. If the MLRO takes any external courses or certifications (for example, a UAE FIU webinar or a DLD workshop on AML), certificates or proof of attendance will be stored. UAE regulations require that training records be kept for at least 5 years as well, similar to other AML records.

All records will be updated promptly and stored in an organized manner. The MLRO is responsible for ensuring the integrity and confidentiality of these records. After the 5-year retention period (which may be extended if required by any updated laws or if instructed by authorities in specific cases), records will be disposed of securely (shredding physical documents, permanently deleting electronic files) to protect customer confidentiality. However, if an investigation is ongoing or anticipated, we will retain records as needed beyond five years on the instruction of law enforcement or the supervisory authority.

By maintaining comprehensive records, East Gate Real Estate LLC can demonstrate compliance with AML requirements and assist authorities in any subsequent investigations. We understand that proper record-keeping is not only a regulatory obligation but also an effective tool for tracking our own compliance efforts.

Suspicious Transaction Reporting (STR)

East Gate Real Estate LLC recognizes its legal obligation to report any suspicious transaction or activity to the UAE authorities without delay. We have a clear procedure in place to identify and report suspicions of money laundering or terrorist financing, in compliance with Federal Decree-Law 20 of 2018 and associated regulations. This section outlines how we handle suspicious transaction reporting (STR), as well as other required reporting such as large cash transaction reports, given the nature of our business.

Identification of Suspicious Activity: All employees (in practice, our sole employee/MLRO) must be vigilant for red flags or indicators of possible money laundering during the course of business. Examples of red flags in real estate transactions can include: a client showing unusual concern about providing standard documentation, usage of significant cash when normally transactions are via bank, multiple quick resales ("flips") of the same property at increasing prices, the involvement of opaque funding sources or third parties with no clear role, a client who is a PEP or has known criminal background attempting an all-cash deal, or any situation where the economic purpose of the transaction is unclear or illogical. We rely on both our training (see Training section) and official guidance (FIU and DLD red flag indicators) to recognize suspicious patterns. If any employee suspects or has reasonable grounds to suspect that a transaction, attempted transaction, or any client activity may involve proceeds of crime or be linked to terrorist financing, they must report it internally to the MLRO immediately.

Internal Reporting Process: Since we are a very small firm, the internal escalation process is straightforward. The MLRO (being the only staff) essentially self-assesses any suspicion. If we had other staff: an employee would fill out a brief internal STR form or otherwise confidentially inform the MLRO about the basis of their suspicion (with relevant details and documents). The MLRO would then record this report and proceed to analyze the situation. In our case, the MLRO documents the suspicion themselves as soon as it is identified. The MLRO will evaluate the circumstances promptly, consulting transaction documents and performing any additional research needed (e.g. re-checking the client against databases, reviewing transaction history, etc.). This evaluation is done urgently, given that reporting must not be unduly delayed. We also ensure that during this analysis, we avoid "tipping off" the client – meaning we will not inform or warn the client that they are under scrutiny or that an STR may be filed. Staff must refrain from any action that could alert the suspect client (for instance, we would continue with normal communications and not divulge the investigation).

Decision and External Reporting (STR Filing): If after review the MLRO determines that the suspicion is credible and there are grounds to believe a transaction or client is involved in money laundering or terrorist financing, the MLRO will file a Suspicious Transaction Report (STR) with the

FIU. All STRs are filed via the official electronic system, goAML, which the company is registered on as required by UAE regulations. The MLRO will include all pertinent information in the STR – details of the client and transaction, the reasons for suspicion, and any supporting documents or evidence (as attachments) that could assist the FIU's analysis. According to UAE law, this report should be made "without delay," which we interpret as immediately after confirming suspicion, generally within 2 business days or sooner from the time of internal escalation. In practice, the MLRO aims to submit the STR as soon as possible once the determination is made, recognizing that swift reporting is crucial to enable authorities to act. We maintain strict confidentiality about the existence of the STR; the report's content is not disclosed to any unauthorised parties (including the subject of the report). The MLRO may, if needed, liaise with the FIU before or after submission for guidance, but will document any such communications.

Post-Reporting Actions: After filing an STR, the company will comply with any instructions or inquiries from the FIU or relevant authorities. If the FIU requests us to delay executing a transaction (for example, to allow them to investigate or freeze funds), we will abide by such directives and cooperate fully. If no immediate feedback is received, the company will independently consider whether it is prudent to proceed with or halt the transaction or business relationship. In many cases, filing an STR does not automatically mean we must stop the transaction; however, if the risks are too high or if continuing the deal could implicate the company in potential money laundering, the MLRO (in consultation with senior management) may choose to pause or terminate the transaction until clearance is obtained. All such decisions will be documented.

Mandatory Reporting of Cash Transactions and Virtual Assets: In addition to STRs for suspicious activities, UAE regulations (and DLD/FIU guidance) require real estate brokers to file reports for certain high-value transactions even if they are not initially deemed suspicious. Specifically, any single or series of related transactions involving cash or virtual assets (such as cryptocurrency) totaling AED 55,000 or more in a property transaction must be reported to the FIU. This is part of the government's efforts to track large cash movements in real estate and mitigate money laundering risks. East Gate Real Estate LLC will comply with this requirement by submitting the appropriate report (often referred to as a "Large Transaction Report" or similar) through the goAML system whenever such a scenario arises. For example, if a buyer intends to pay the property down payment in cash exceeding AED 55,000, or if a client uses Bitcoin or another virtual asset equivalent to AED 55,000 or above in value to fund a purchase, the MLRO will file the required report with details of the transaction. This report is filed whether or not the transaction appears suspicious, as it is a regulatory requirement. The MLRO must be knowledgeable about the format and information required for these reports, and ensure they are submitted in a timely fashion (typically prior to or immediately upon the transaction taking place). We also keep evidence of having filed these reports (such as confirmation receipts from the FIU system) in our records.

No Tolerance for Non-Compliance: Failing to report suspicious transactions or required cash/virtual asset transactions can lead to severe penalties for the company and responsible individuals under UAE law. Therefore, the MLRO and all staff understand that reporting is not optional – it is a legal duty. We emphasize this in training and internal communications. The company would rather file an STR out of caution (even if it later proves to be nothing significant) than miss reporting something that could be illicit. In line with UAE's stringent approach, we know that swift and thorough reporting of suspicious activities is critical to the national AML/CFT effort .

In summary, East Gate Real Estate LLC will swiftly report any suspicious activity to the FIU through goAML, maintain confidentiality (no tipping off), and also fulfill any other reporting obligations (like large cash transaction reports). By doing so, we comply with our regulatory responsibilities and contribute to the prevention of money laundering and terrorist financing in the UAE's real estate sector.

Internal Controls and Compliance Management

We have established internal controls to ensure effective implementation of this AML policy and compliance with all legal requirements. Despite having only one employee, the company structures its internal processes to provide checks and accountability to the extent possible, and will leverage external resources if needed to strengthen its control environment. The following internal control measures are in place:

- **Policies and Procedures:** This written AML Policy and Procedure document is a foundational internal control. It has been reviewed and approved by senior management. The policy clearly delineates the procedures for CDD, EDD, monitoring, reporting, recordkeeping, and training. It will be reviewed at least annually (and updated as needed) to incorporate any changes in UAE laws, regulations, or guidance from supervisory authorities . The MLRO is responsible for keeping the policy up-to-date and for circulating any updates to relevant personnel (in our case, the sole employee and any future hires). The company also ensures that any new business processes or products (if any in future) are assessed for AML risk and the policies are adjusted accordingly.

- **Compliance Officer (MLRO) Appointment:** As required for all Designated Non-Financial Businesses and Professions (DNFBPs) including real estate brokers, East Gate Real Estate LLC has appointed an MLRO who is qualified and holds sufficient seniority to enforce AML compliance. The MLRO has a direct reporting line to the owner (where these are different persons) or is themselves the owner, ensuring that compliance issues receive due attention at the highest level. The MLRO's roles and responsibilities are described in detail in the Roles and Responsibilities section of this policy. Critically, the MLRO has full access to all customer and transaction records and the authority to make necessary decisions (such as rejecting a high-risk client or pausing a transaction) in the interest of AML compliance. The company will notify DLD or the relevant regulator of the MLRO's appointment as required, and likewise inform them in the event of any change in this position.
- **Dual-Control or Approval Processes:** While our staff count is one, we still incorporate a principle of dual review for the most critical decisions by involving the owner or seeking external input. For instance, if a particularly large or complex transaction occurs or if a potential STR situation arises, the MLRO/sole employee will, where feasible, consult with a trusted external compliance advisor or legal counsel for a second opinion. This serves as a form of independent review, given we cannot have internal separation of duties with more staff at this time. All high-risk client approvals and STR decisions are documented by the MLRO and reviewed by the owner (if the owner is not the MLRO) to ensure awareness and accountability.
- **Risk Assessment:** The company conducts an internal Business Risk Assessment to identify and evaluate the potential money laundering and terrorist financing risks it faces. This risk assessment considers factors such as the types of customers common to our business (e.g. international investors, local off-plan buyers, corporate vs. individual clients), the geographic areas involved (many clients might be from outside the UAE), the typical transaction sizes (often high-value), and methods of payment. By understanding these risk factors, we can implement proportionate controls. For example, if our risk assessment finds a higher risk of cash being offered in deals, we will pay extra attention to cash transactions and strictly enforce non-cash policies beyond a threshold. The risk assessment is updated periodically or when new risk factors emerge (for instance, if the government flags new trends like misuse of third-party checks in real estate, we would include that). The outcomes of the risk assessment directly inform our CDD and EDD measures and overall AML program focus. We keep a written record of our risk assessment and any steps taken to mitigate identified risks.
- **Transaction Controls:** Internally, we have set certain controls around how transactions are handled to ensure compliance. For example, we have a strict policy against accepting cash payments above AED 55,000, in line with the law, and in practice we encourage all payments to go through regulated banking channels. If a client attempts to give a cash payment that is suspicious or over threshold, the MLRO will intervene. Similarly, if any

third-party payments are requested, we will not proceed until due diligence on that third party is done. Our commission payments to the company are also monitored – we only accept commissions via bank transfer or cheque from known sources (like the trustee or the developer) to avoid handling illicit funds.

- **Systems and Technology:** Given the scale of our operations, our “system” for AML is largely manual, but we do use available tools to enhance controls. We use government databases and online systems for ID verification (such as the UAE Pass or DLD’s verification tools for Emirates IDs, when accessible). We maintain access to updated sanctions lists and can use simple screening software or publicly available screening websites to check names against sanctions/PEP lists. As our business grows, we plan to adopt more advanced compliance technology (for example, an electronic client screening and monitoring solution) to further strengthen our capabilities. For now, the MLRO maintains an internal spreadsheet/tracker of all clients and transactions with risk ratings and key due diligence data, which can help in spotting if, for example, one client is attempting multiple property purchases in an unusual pattern.
- **Independence and Effectiveness of Compliance Function:** Even as a one-person operation, we ensure that compliance is not compromised by commercial considerations. The MLRO has the authority to delay or reject business that poses unacceptable AML/CFT risk, even if it means losing a sale. The owner fully supports this mandate. We also subject our AML program to independent evaluation: periodically (for instance, annually) we will hire an external consultant or auditor specialized in AML/CFT to review our policies and sample transactions for compliance. This independent review will help identify any gaps and suggest improvements, ensuring our controls remain effective and up to date with best practices. The findings of such reviews will be documented, and remedial actions will be taken promptly on any recommendations.
- **Regulatory Engagement:** We actively cooperate with our supervisory authorities. East Gate Real Estate LLC, being registered with DLD, will submit to any examinations or inspections that DLD (in coordination with Ministry of Economy) conducts on our AML compliance program. The MLRO will respond to any regulator queries, provide documents for inspection, and implement any feedback or corrective actions ordered by the regulators. We understand that regulators in the UAE have also introduced significant penalties for DNFBPs that fail to comply with AML requirements (including fines, suspensions, and even criminal liability). This underscores the importance of our internal controls and the seriousness with which we take compliance.

Through these internal controls, we ensure that AML compliance is integrated into our daily operations, despite our minimal staff size. The controls are designed to be practical for a one-employee company while still meeting the standards expected by law. We are committed to continuously improving our compliance framework, recognizing that AML/CFT is an evolving field and that criminals may adapt their methods. By maintaining robust internal controls and a proactive compliance mindset, we aim to prevent our firm from ever being a conduit for illicit funds.

Training and Awareness

Continuous training and awareness are critical components of an effective AML program. Given that East Gate Real Estate LLC has only one employee (who is also the MLRO), we ensure that this individual receives adequate and regular training on AML/CFT requirements. If the firm expands and hires additional employees in the future, all personnel will be required to undergo AML training as well. Our training and awareness efforts include the following elements:

- **Induction Training:** Any new employee (including if a new MLRO is appointed) will receive AML training at the start of their engagement. This covers an overview of what money laundering and terrorist financing are, why AML/CFT is important, the legal obligations in the UAE, and a walkthrough of the company's AML policies and procedures. New staff must read and understand this AML Policy document. We provide a copy of the policy to them and clarify any questions they have about their responsibilities .
- **Ongoing Regular Training:** The company commits to conducting regular training sessions – at least annually, and more frequently if needed – to keep up-to-date with evolving risks, regulations, and techniques. In a one-person context, this means the MLRO will either self-train (through online courses, webinars, reading materials from regulators) or attend external training sessions/workshops provided by authorities or reputable training providers. For example, the UAE FIU and DLD periodically issue guidance, typology reports, or hold seminars; the MLRO will participate in these to stay informed. We treat training attendance as mandatory. Topics covered in ongoing training include: updates to UAE AML laws or lists of sanctioned countries, any new DLD or FIU guidelines, emerging trends in real estate money laundering (such as new methods involving crypto assets or use of shell

companies), how to identify red flags specific to real estate (case studies of suspicious property deals), and reminders of internal procedures for CDD, EDD, and STR filing.

- **Training Content and Material:** The training is designed to be practical and relevant. We include real-life examples and red-flag case studies to illustrate what types of behavior or transactions should raise concern. This might involve discussing actual enforcement cases in the UAE or internationally where real estate was used to launder money, so that the lessons can be learned. The training also reinforces key concepts like how to verify customer identity properly, how to question clients diplomatically when gathering source of funds, how to use the goAML system for reporting, and the legal consequences for the company and individuals if we fail to comply. By covering actual scenarios and consequences, the training ensures the seriousness of AML obligations is understood.
- **Employee Responsibility and Certification:** After each training session, employees (or the single employee, in our case) are typically asked to acknowledge that they have attended and understood the content. We may have a simple quiz or checklist to confirm key takeaways (for instance, “what would you do if a client offers cash over 55k AED?” or “who is our MLRO and what is your duty if you see something suspicious?”). This helps reinforce knowledge. The MLRO will sign-off on having completed their own training requirements annually, and this is reported to senior management/owner. In a one-person company, this is more of a self-declaration, but it’s important for record-keeping.
- **Training Records:** We maintain a training log documenting the training sessions undertaken – including dates, topics covered, and the participant (employee name). Certificates from external courses or workshops are kept on file. As required by regulators, these training records will be retained for at least five years. They may be reviewed during inspections to verify that the company is fulfilling its training obligations.
- **Awareness and Culture:** Beyond formal training sessions, we aim to cultivate a general culture of compliance where AML/CFT is seen as everyone’s responsibility. The MLRO/owner regularly communicates any important AML news or typology alerts to make sure we remain vigilant. For example, if the FIU issues an alert about a new scam or trend (like properties being bought via intermediaries or using certain mortgage schemes to launder money), we will treat that as a learning moment and discuss how to prevent such risks in our operations. We encourage an environment where asking questions and reporting concerns is supported. Since we are small, this simply means the MLRO stays curious and up-to-date, but if we grow, we want each employee to feel it’s their duty to speak up about potential issues without fear.
- **Specialized Training for Roles:** If in the future the company designates certain roles (e.g., a front-office sales agent vs. a back-office administrator), we will tailor training to their functions. For instance, sales agents would get more training on spotting red flags during client interactions and initial due diligence, whereas an accountant handling client

payments would be trained more on transaction monitoring and record-keeping. Currently, with one person handling all roles, that individual receives comprehensive training covering all aspects.

Our training program ensures that knowledge of AML/CFT is continuously reinforced. The MLRO remains informed about regulatory expectations and industry best practices, and this knowledge directly feeds into how our small firm operates. By educating ourselves consistently, we reduce the risk of inadvertent compliance failures and strengthen our ability to detect and prevent illicit activity. Moreover, regulators expect that even the smallest businesses understand their AML duties; through regular training and a proactive learning approach, East Gate Real Estate LLC meets these expectations and maintains a high level of AML awareness .

Conclusion

This Anti-Money Laundering Policy and Procedure document is intended to guide East Gate Real Estate LLC in maintaining full compliance with UAE AML/CFT laws and regulations while operating effectively as a one-person real estate brokerage. The measures outlined – from rigorous customer due diligence and enhanced checks on high-risk cases, to ongoing monitoring, proper record-keeping, prompt suspicious reporting, robust internal controls, and continuous training – collectively form a robust framework to mitigate the risk of money laundering and terrorist financing through our business. By adhering to this policy, the company not only complies with Cabinet Decision 10 of 2019 and Federal Law 20 of 2018 requirements, but also upholds the integrity of Dubai's property market and contributes to the UAE's broader efforts to combat financial crime .

All personnel are required to familiarize themselves with and follow this policy at all times. The MLRO will ensure that any updates to laws or guidance (from the FIU, DLD, or other authorities) are reflected in the policy and communicated promptly. Non-compliance with these procedures is not tolerated and can lead to internal disciplinary action as well as regulatory penalties. On the other hand, effective compliance as set forth in this document will protect the company from legal risks and reputational harm, and safeguard the community by preventing abuse of the financial system.

East Gate Real Estate LLC's management is fully committed to this AML program. We acknowledge that the fight against money laundering and terrorist financing is ongoing, and we will remain vigilant and proactive in our compliance efforts. This policy will be reviewed on a regular basis (at least annually) or when significant changes in regulation occur, to ensure it remains current and effective. By diligently implementing these policies and procedures every day, we aim to keep our business safe, reputable, and in line with the highest standards of ethical conduct and legal compliance.