AML / CTF POLICY

1. Introduction and Policy Objectives

1.1. Purpose and Scope of the Policy

This Anti-Money Laundering and Counter-Terrorist Financing Policy (the "Policy") is adopted by **Joycee Gifts Ltd** (the "Company"), a private limited company incorporated under the laws of England and Wales, with its registered office at:

311 Shoreham St, Highfield, Sheffield S2 4FA, United Kingdom.

Official website: https://joycee.gifts

This Policy governs the Company's internal compliance procedures relating to Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF), particularly in connection with the distribution and sale of Digital Products including, but not limited to, including coupons, prepaid vouchers, promo codes, and gift cards.

1.2. Policy Objectives

The objectives of this Policy are to:

- Ensure full compliance with applicable UK laws and regulations relating to AML and CTF, including but not limited to:
    - The Proceeds of Crime Act 2002 (POCA)
    - The Terrorism Act 2000
    - The Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 (MLR 2017)
- Establish a structured and effective system for:
    - Customer identification and verification (Know Your Customer – KYC / Customer Identification Program – CIP)
    - Application of risk-based due diligence procedures (CDD/EDD)
    - Monitoring of transactions and reporting of suspicious activity (SAR) to competent UK authorities
- Assign roles and responsibilities to management, compliance officers, and personnel
- Safeguard the Company, its Users, and its partners against money laundering, terrorist financing, and related financial crimes

1.3. Scope of Application

This Policy applies to all employees, contractors, third-party agents, and departments of the Company that interact with Users or process financial transactions on behalf of the Company within the United Kingdom. Where UK regulatory guidance (e.g., from the FCA or HMRC) imposes stricter standards than those defined in this Policy, the stricter standard shall prevail.

2. Legislative and Regulatory Framework

The Company adheres to the following legal and regulatory frameworks:

- **UK Laws:**
    - Proceeds of Crime Act 2002 (POCA)
    - Terrorism Act 2000
    - Money Laundering Regulations 2017 (MLR 2017)
- **Guidance from UK Regulators:**
    - Financial Conduct Authority (FCA)
    - HM Revenue & Customs (HMRC)
    - Joint Money Laundering Steering Group (JMLSG)
- **International Standards:**
    - FATF Recommendations
    - EU AML Directives (applicable where cross-border operations occur)
- **Data Protection:**
    - UK GDPR and the Data Protection Act 2018

3. Key Terms and Definitions

- **Money Laundering** – Concealing the origin of illicitly obtained funds.
- **Terrorist Financing** – Providing or collecting funds to support terrorist acts or organizations.
- **KYC / CIP** – Know Your Customer / Customer Identification Program: Procedures to verify User identity and assess risk.
- **CDD / EDD** – Customer Due Diligence / Enhanced Due Diligence: Tiered verification procedures.

- **PEP** – Politically Exposed Person: A person in a prominent public role, subject to heightened scrutiny.

- **SAR** – Suspicious Activity Report: A report submitted to the NCA regarding suspicious behavior.

- **MLRO** – Money Laundering Reporting Officer: Responsible for AML/CTF oversight and SAR filings.

4. Risk-Based Approach (RBA)

4.1. General Principles

The Company adopts a risk-based approach, considering:

- **User type:** Individuals, businesses, PEPs

- **Jurisdiction:** High-risk or sanctioned countries

- **Products/services used:** Digital codes, high-value items

- **Channels:** Online, affiliate, referral-based systems

4.2. Risk Categories

- **Low Risk:** Verified Users from regulated jurisdictions

- **Medium Risk:** Incomplete profiles or unusual purchasing patterns

- **High Risk:** PEPs, high-risk jurisdictions, abnormal transaction sizes

4.3. Risk Review

The Company shall conduct a full reassessment of its internal AML risk model annually or immediately after legal/regulatory changes.

5. KYC and Verification Procedures

5.1. Information Collection

For individuals:

- Full name, DOB, nationality, address, ID documents, contact details

For legal entities:

- Company name, registration number, registered address, UBOs, key officers, Companies House records

5.2. Verification Methods

- Cross-checking against public records and government databases
- Use of electronic identity verification (EIDV)
- Notarized documents in high-risk cases

5.3. Simplified Due Diligence (SDD)

SDD may apply to low-risk Users under strict internal thresholds.

5.4. Enhanced Due Diligence (EDD)

EDD is required for:

- PEPs or their associates
- Users from high-risk jurisdictions
- Users engaged in high-value or anomalous transactions
- Users flagged in adverse media reports

EDD measures include:

- Source of funds checks
- Additional documentation
- Approval by the MLRO or senior management

6. Transaction Monitoring

6.1. Monitoring Systems

The Company employs automated tools to identify suspicious activity based on predefined thresholds.

6.2. Alert Triggers

Triggers include:

- Unusual frequency or volume
- Structuring (smurfing)
- Use of high-risk payment methods
- Inconsistencies with the User's profile

6.3. Manual Review

All flagged transactions are reviewed by the MLRO and escalated as needed.

7. Suspicious Activity Reporting

7.1. Legal Obligation

All suspicious activity must be reported via a **Suspicious Activity Report (SAR)** to the **National Crime Agency (NCA)** under POCA and MLR.

7.2. Procedure

1. **Detection:** Staff identifies red flag or receives system alert
2. **Escalation:** Forwarded to MLRO
3. **Assessment:** MLRO reviews and may file SAR
4. **Confidentiality:** "Tipping off" is strictly prohibited

8. Roles and Responsibilities

8.1. Management

- Approves this Policy
- Ensures resource allocation
- Oversees internal controls

8.2. MLRO / Compliance Officer

- Maintains this Policy
- Monitors transactions
- Files SARs
- Coordinates with regulators

8.3. Staff

- Conduct KYC/CDD/EDD
- Report red flags
- Participate in training

9. Data Protection and Confidentiality

9.1. Retention

KYC and transaction data are retained for a minimum of **five (5) years** post-relationship or final transaction.

9.2. Personal Data Use

Personal Data is processed solely for AML/CTF compliance and only in accordance with applicable legal requirements and, where required, with the User's consent.

9.3. Access Control

Access to User data is strictly limited to authorized personnel whose job functions require such access.

10. Training and Awareness

10.1. Annual Training

All staff must undergo annual AML/CTF training.

10.2. Target Groups

- **New employees:** Introductory compliance training
- **MLRO / Compliance:** Ongoing development and external certification
- **Executives:** Legal risks and governance obligations

11. Audit and Review

11.1. Internal Audit

Conducted annually to ensure compliance.

11.2. External Audit

May be commissioned internally or imposed by authorities.

12. Non-Compliance and Sanctions

12.1. Internal Disciplinary Measures

Breaches may result in:

- Warnings
- Suspension
- Dismissal

12.2. Regulatory Sanctions

Non-compliance may lead to:

- FCA/HMRC fines
- Revocation of authorizations
- Criminal liability under POCA or the Terrorism Act

13. Cooperation with Authorities

The Company fully cooperates with:

- Financial Conduct Authority (FCA)
- HM Revenue & Customs (HMRC)
- National Crime Agency (NCA)
- Office of Financial Sanctions Implementation (OFSI)

Only the MLRO or Compliance Department may respond to official inquiries.

14. Policy Approval and Review

14.1. Effective Date

This Policy is effective as of **23 October 2025** upon approval by senior management.

14.2. Review Cycle

Reviewed at least annually and updated as required by changes in law or operations.

15. Contact Information

- Company: Joycee Gifts Ltd
- Address: 311 Shoreham St, Highfield, Sheffield S2 4FA, United Kingdom
- Official website: https://joycee.gifts
- Email: info@joycee.gifts

16. Final Provisions

This Policy reflects the Company's unwavering commitment to AML/CTF compliance. All employees, contractors, and representatives are obligated to comply with this Policy and applicable UK law. In the event of conflict between this Policy and any statutory requirement, the latter shall prevail.