

## **ANTI-MONEY LAUNDERING / COUNTERING THE FINANCING OF TERRORISM POLICY**

Hotlotz is committed to the fight against money laundering and terrorist financing.

We have robust AML processes in place. We train our staff to be vigilant when dealing with unusual transactions; we ensure that we take appropriate steps to know our clients and business partners.

We perform client and transaction due diligence, monitoring, and record-keeping.

We do not accept payments in cash or by cheque.

Hotlotz only accepts payments from the buyer named on the invoice. We cannot accept third-party payments from an individual or organisation that is not named as the buyer. This includes payments from a spouse or another family member.

Hotlotz can only make settlement payments to the individual or organisation named on the Sales Contract.

Clients may also be asked to verify their identity by providing identifying information to Hotlotz, including NRIC/FIN number, passport number, occupation, nationality, address, date of birth and contact number. If we request this information and it is not provided we may terminate a transaction that we have entered into.

Our AML policies are subject to regular review to ensure the proper functioning of our procedures. This is done to protect our clients and our interests. All information is collected in accordance with the Personal Data Protection Act 2012.

Hotlotz is licensed to sell precious stones and precious metals in Singapore (Regulated Dealers Certificate of Registration No. PS20190001021). For further information about this regulation see <https://acd.mlaw.gov.sg>.