



**Reference No:** P&P/CC/555

**Company:** Cortexa Capital Ltd.

**Address:** 3rd Floor, 86-90 Paul Street, London, England, EC2A 4NE

**Date:** 15<sup>th</sup> Aug, 2025

# POLICIES AND PROCEDURES MANUAL

**Cortexa Capital Ltd**

Effective Date: Aug 2025

## 1. Customer Due Diligence (CDD) Measures

### 1.1 Purpose and Scope

Cortexa Capital Ltd ("the Company") is committed to implementing robust Customer Due Diligence (CDD) measures to prevent money laundering, terrorist financing, and the facilitation of illicit transactions. These procedures apply to all customers engaging in precious metals transactions, including gold dore sales and purchases.

CDD requirements apply to:

- Direct buyers and sellers of precious metals
- Facilitators and intermediaries
- Beneficial owners with material interest (>25%)
- Ultimate beneficial owners of corporate entities
- Trade finance partners and refineries

### 1. Customer Due Diligence (CDD)

1. The company must identify and verify all customers and, where applicable, beneficial owners before establishing a business relationship or executing a transaction above the internal threshold.
2. For individuals, obtain and verify at least: full name, date of birth, residential address, and government-issued ID.
3. For entities, obtain and verify at least: legal name, registration number, registered address, ownership and control structure, and IDs of directors and beneficial owners.
4. Enhanced due diligence (EDD) must be applied where higher risk is identified, including complex structures, high-risk countries, PEPs, or unusual transaction patterns.
5. If CDD cannot be completed, the business relationship must not be started or must be terminated, and consideration given to filing a suspicious activity report.

## 2. Record-Keeping

1. The company must keep CDD records, transaction records, and internal/external reports in a secure and retrievable manner.

This document, including all its contents, attachments, and the information contained herein, is strictly confidential, privileged, and intended solely for the use of the individual or entity to whom it is addressed ("the Recipient"). Any unauthorised review, disclosure, copying, distribution, replication, or dissemination of this document, in whole or in part, by any means is strictly prohibited and may be unlawful. No part of it may be reproduced, stored in a retrieval system, or transmitted in any form or by any means without the prior written consent of the author, Cortexa Capital Ltd. If you are not the intended recipient, please destroy all copies of this document and notify the sender immediately. This communication may contain information that is protected by legal privilege. By accepting this document, the recipient agrees to be bound by these confidentiality conditions.





**Reference No:** P&P/CC/555

**Company:** Cortexa Capital Ltd.

**Address:** 3rd Floor, 86-90 Paul Street, London, England, EC2A 4NE

**Date:** 15<sup>th</sup> Aug, 2025

2. Records must be retained for at least 5 years from the end of the business relationship or the date of the relevant transaction, whichever is later, or longer if required by law or ongoing investigations.
3. Access to records is restricted to authorised staff only and must be provided promptly to competent authorities upon lawful request.

---

### 3. Politically Exposed Persons (PEPs)

1. The company must screen customers and beneficial owners for PEP status at onboarding and periodically during the relationship.
2. Where a PEP (or a close family member/known close associate of a PEP) is identified, the company must:
  - Apply enhanced due diligence.
  - Obtain senior management approval to establish or continue the relationship.
  - Take reasonable measures to establish the source of wealth and source of funds.
3. PEP status must be reviewed periodically and whenever new relevant information becomes available.

---

### 4. Reporting of Suspicious Transactions

1. All staff must promptly report any knowledge, suspicion, or reasonable grounds to suspect money laundering or terrorist financing to the designated compliance officer (MLRO).
2. The MLRO must assess internal reports without delay and, where suspicion is confirmed or cannot be reasonably dismissed, file a suspicious activity/transaction report with the relevant authority as required by law.
3. Staff are strictly prohibited from informing the customer or any third party that a report has been made or that an investigation may be underway ("tipping off").
4. Internal reports, MLRO assessments, and submitted reports must be documented and retained in line with the record-keeping requirements.

All personnel acknowledge understanding and acceptance of these policies through signed acknowledgment forms.

---

**Document Version:** 1.0

**Last Revised:** December 2025

**Next Review Date:** December 2026

**Approved By:** Board of Directors, Cortexa Capital Ltd

This document, including all its contents, attachments, and the information contained herein, is strictly confidential, privileged, and intended solely for the use of the individual or entity to whom it is addressed ("the Recipient"). Any unauthorised review, disclosure, copying, distribution, replication, or dissemination of this document, in whole or in part, by any means is strictly prohibited and may be unlawful. No part of it may be reproduced, stored in a retrieval system, or transmitted in any form or by any means without the prior written consent of the author, Cortexa Capital Ltd. If you are not the intended recipient, please destroy all copies of this document and notify the sender immediately. This communication may contain information that is protected by legal privilege. By accepting this document, the recipient agrees to be bound by these confidentiality conditions.

