

# Fraud Detection & Transaction Monitoring Policy

## 1. Introduction

This Fraud Detection & Transaction Monitoring Policy ("Policy") outlines the guidelines and procedures that GCCH Management FZE ("GCCH") follows to prevent, detect, and mitigate fraudulent activities and suspicious transactions within its operations. As a Dubai licensed Payment Service Provider (PSP), GCCH is committed to maintaining the highest standards of security and compliance to safeguard the interests of its clients and maintain the integrity of the financial system.

## 2. Objective

The primary objective of this policy is to establish a robust framework for fraud detection and transaction monitoring, ensuring that all transactions processed by GCCH are legitimate and comply with relevant regulations and standards.

## 3. Definitions

**Fraud:** Any intentional act of deception, misrepresentation, or manipulation with the intention to gain an unfair or dishonest advantage.

**Suspicious Transaction:** A transaction that exhibits unusual patterns or characteristics that may indicate potential involvement in illegal activities, including money laundering or fraud.

**Transaction Monitoring:** The continuous monitoring of transactions in real-time to identify and assess potentially suspicious or fraudulent activities.

## 4. Responsibilities

**4.1 Management:** GCCH's senior management is responsible for overseeing the implementation and effectiveness of the fraud detection and transaction monitoring program.

**4.2 Compliance Officer:** The designated compliance officer is responsible for ensuring that all transactions are monitored in accordance with this policy and applicable regulations.

**4.3 Risk Management Team:** The risk management team is responsible for conducting risk assessments, defining transaction monitoring scenarios, and analyzing suspicious activities.

## 5. Fraud Detection & Transaction Monitoring Procedures

**5.1 Transaction Monitoring Scenarios:** GCCH will establish transaction monitoring scenarios based on various risk factors, including transaction size, frequency, origin, destination, and customer behavior.

**5.2 Real-time Monitoring:** GCCH will implement real-time transaction monitoring systems that analyze transactions as they occur to identify potential anomalies and suspicious activities.

**5.3 Thresholds & Triggers:** GCCH will set transaction thresholds and triggers that prompt further investigation or action when predefined criteria are met.

**5.4 Data Analysis:** GCCH will employ advanced data analysis techniques, including machine learning and artificial intelligence, to enhance the accuracy and efficiency of fraud detection and transaction monitoring.

**5.5 Customer Profiling:** GCCH will maintain customer profiles to better understand normal transaction patterns and quickly identify deviations from the norm.

**5.6 Escalation & Reporting:** If a suspicious transaction is identified, the compliance officer will be promptly notified. If warranted, reporting to relevant authorities will be carried out as per applicable regulations.

**5.7 Collaboration:** GCCH will collaborate with law enforcement agencies, financial intelligence units, and other PSPs to share information on suspicious activities when necessary.

## 6. Training & Awareness

GCCH will provide regular training to its employees on fraud detection, transaction monitoring procedures, and the importance of vigilance against fraudulent activities. Employees will be informed of their responsibilities in preventing and detecting suspicious transactions.

## 7. Periodic Review

GCCH will conduct periodic reviews of its fraud detection and transaction monitoring procedures to ensure their effectiveness and relevance in the evolving threat landscape. The policy will be updated as needed to reflect changes in regulations, technologies, and risks.

## 8. Conclusion

GCCH Management FZE is dedicated to upholding the highest standards of integrity, security, and compliance. This Fraud Detection & Transaction Monitoring Policy demonstrates our commitment to preventing fraud and ensuring the legitimacy of all transactions processed through our platform.