

INGOT Brokers Recruitment and Retention Policy

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Recruitment

We believe that hiring qualified individuals to fill positions at the company contributes to the overall strategic success of INGOT Brokers. Each employee, while employed, is hired to make significant contributions. The following process should be followed in the hiring process.

Hiring Process and Procedures

Requests must be initiated by the department supervisor/manger, approved by the CEO and forwarded to the HR unit. Requests should indicate the following:

- Position title
- Reasons for opening
- Essential job functions and qualifications (or a current job description may be attached)
- Any special recruitment advertising instructions

Job Postings

Openings are posted on different social media platforms describing the position, duties and qualifications of the candidate needed. In case of internal transfers the new job positing is created.

The HR will submit resumes of qualified candidates to the hiring manager/supervisor. The hiring manager will identify the most appropriate candidate for interviewing.

Select Process

1. Hiring managers are responsible for conducting timely, effective interviews of qualified candidates to open positions. The HR unit is available to advice the hiring managers on interview techniques and final candidate selection.
2. Upon selection of the final candidate, the hiring manager and the HR department will collaborate to develop an appropriate offer of employment (including position title, compensation, duties, etc.).
3. HR unit will extend a job offer of employment to the candidate selected. HR will prepare the written contract for the candidate.
4. Upon receipt of job offer letter signed by the candidate, the HR unit close out the requisition.

After Hiring

1. HR performs an introduction for the employee about the company and key people.
2. HR creates an account for the new employee on the HR system and updates it with the employee info needed.
3. HR informs accounting with the employee name, start date and salary by email.

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Responsibility

The HR department is responsible for the overall management of the recruitment and selection processes, including employment-related agency relationships, contract negotiations and maintenance, and the processing of new requisitions, offers and employees.

Employee screening

We ensure, as part of our employment processes that we carry out the following investigations in relation to Designated Employee types, prior to commencing employment or if, in the view of the AML/CFT compliance officer, these checks need to be conducted:

- Criminal history check (National Police Check);
- Right to work in Australia via Department of Immigration and Citizenship;
- Address verification/ basic I.D. check via electoral roll and telephone registry searches; Employment references;
- Academic qualification check (all tertiary qualifications should be checked); Professional recognition check eg CPA, CA, AHRI etc;
- Directorships or company/ business interests held - all details (check whether any conflict of interest);
- Disqualified directors & other company officials check via ASIC website www.asic.gov.au;
- Enforceable Undertaking check via the ASIC website www.asic.gov.au; and Search engine check.

Records of the results of the screening processes are created, and the compliance officer reviews the results of the screening process, to consider whether the report includes any AML/CTF-related findings about the employee, which could be of concern to us. The compliance officer will review the reports with the Board.

If your business engages agents, this section should include a procedure explaining how you screen agents.

Designated Employee types include roles in our business that is susceptible to facilitating ML/TF (for example, customer-facing positions where the employee may be offered a bribe to circumvent certain customer onboarding rules). Specifically:

Staff who can send or receive money on our behalf

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Re-screening employees

Every 3 years, we re-screen our employees, and again carry out the following checks and investigations:

- criminal history check (National Police Check);
- ASIC check, checking the disqualified register (ASIC)

The compliance officer maintains a diary system which alerts the compliance officer to when the period of 2.5 years has elapsed since the last screening process took place, and requires him or her to re-screen the relevant employees (all records are retained by us).

Records of the results of the re-screening processes are created, and the compliance officer reviews the results of the re-screening process, to consider whether the report includes any AML/CTF-related findings about the employee, which could be of concern to us. The compliance officer will review the reports with the Board.

Transfer / Promotion Re-screening

Employees who are transferred or promoted into a role where she/he can facilitate money laundering or terrorism financing may be re-screened, at the discretions of the AML / CTF compliance officer and the Board

Failure to comply with the Program

Any failures to comply with the Program must be reported to the Board by the AML / CTF compliance officer.

Any employee who fails, without reasonable excuse, to comply with any system, control or procedure within this Program must, as a minimum, recomplete the AML / CTF Training Program. The Board may also impose additional requirements after considering the failure, such as further training, termination of employment, removal of authorization, or other punitive action.