

«Approved» by
Board of Directors
Kyrgyzaltyn OJSC
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Guidance on Risk Assessment in the Precious Metals Supply Chain

Bishkek

2023

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1. Purpose

This Guidance describes the precious metals supply chain management system in place at Kyrgyzaltyn Open Joint Stock Company (hereinafter referred to as Kyrgyzaltyn OJSC).

The Precious Metals Supply Chain Management System (hereinafter referred to as the System) is developed based on the London Bullion Market Association (LBMA) Responsible Gold Guidance (hereinafter referred to as the LBMA Guidance) to ensure reliable selection and assessment of suppliers, formation of liability, exclusion the risk of direct or indirect support of any conflicts, combating human rights violations, combating money laundering and terrorist financing, compliance with requirements in the field of environmental protection.

The Precious Metals Supply Chain Risk Assessment Guidance contains:

- structure and principles of constructing the System;
- description of supplier identification procedures;
- description of the risk assessment procedure;
- description of the risk mitigation/risk management procedure;
- description of the staff training process;
- the procedure for annual reporting on the functioning of the System;
- procedure for conducting external and internal audits.

2. Scope

The requirements of the Guidance apply to the activities of the management team and employees of all divisions of Kyrgyzaltyn OJSC participating in the gold and silver supply chain.

3. Responsibility

Responsibility for meeting the requirements of the standards described in this Guidance lies with members of the Management Board, including heads of structural divisions of the Company involved in interaction with counterparties and taking part in the process of supplying raw materials and precious metals.

4. Terms and Definitions

Counterparty questionnaire – a list of questions sent to the counterparty in order to determine compliance of its activities with LBMA requirements.

Conflict-affected and high-risk areas (CAHRA) – These areas are identified by the presence of armed conflict, widespread violence, or other risks of harm to people. An armed conflict may take various forms, such as a conflict of an international or non-international character, which may involve two or more states, or it may consist of wars of liberation, insurrections, civil wars, etc.

High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law.

Recycled gold is raw materials and materials that contain gold and have previously gone through a refining production procedure (scrap, jewelry waste, etc.).

The counterparty's file is documents compiled in one folder and additional information collected by employees of responsible departments about the counterparty.

Mined gold - raw materials and materials containing gold, for which the refining production procedure has not previously been carried out (Dore alloy, cathode gold, surface gold, etc.)

The counterparty's profile is a database in the information system of Kyrgyzaltyn OJSC, which must be filled out (updated) by employees of the responsible departments for each counterparty.

Counterparty (customer, supplier) is a legal entity or individual (private entrepreneur) who is a party to the contract and supplies raw materials and precious metals.

The responsible department is a structural unit of Kyrgyzaltyn OJSC, which takes part in the process of supplying raw materials and precious metals:

- EEAD– External Economic Activities Directorate of Kyrgyzaltyn OJSC;
- PTD – Production and Technical Department of Kyrgyzaltyn OJSC ;
- SD – Security Directorate/Division of Kyrgyzaltyn OJSC;
- Labor Protection, Safety and Environment Department of Kyrgyzaltyn OJSC;
- PCD – Process Control Department of the “Refinery” branch of Kyrgyzaltyn OJSC;
- R&SD –Precious Metal Regime and Safety Department of the “Refinery” branch of Kyrgyzaltyn OJSC.

Politically Exposed Persons (PEP) are politically exposed persons (political persons involved in corrupt and illegal activities) (see definition p.10 of the LBMA Responsible Gold Guidance).

Certificate about the counterparty - information containing information about shareholders, management structure, financial information, information about the number of employees, etc. using software products of news agencies.

Zero tolerance is a term that implies the imposition of the maximum possible restrictions and sanctions under the law, even for minor offenses, in order to eliminate unwanted behavior.

5. Organization and principles of system construction

5.1. The Chairman of the Management Board has the authority and responsibility for:

- providing general management of the activities of all structural divisions within the framework of the precious metals supply chain management system in force in the Company;
- allocation of the necessary resources and creation of the necessary conditions to implement the requirements of the precious metals supply chain management system.

5.2. The Deputy Chairman of the Management Board has the authority and responsibility for:

- monitoring of all supplies of gold and silver;
- coordination of documents related to supply chain management.

5.3. The Chairman of the Management Board delegates authority for the general management of the System. By Order of the Chairman of the Management Board of Kyrgyzaltyn OJSC, a Management Representative is appointed with the following functional responsibilities:

- drawing up and submitting a report on the performance of work to the LBMA on behalf of the Management Board of the Company;
- providing the necessary resources to maintain and monitor supply chain due diligence;
- development of an organizational structure and communication processes that will ensure that relevant departments and contractors are informed of important information, including the Company's policies (informing through sending letters/e-mails/memos);
- ensuring internal accountability of the responsible persons for compliance with LBMA standards for implementing due diligence processes in the gold supply chain.

5.4. By order of the Chairman of the Board, a chief LBMA specialist is appointed who meets the following requirements:

- have sufficient qualifications, knowledge and experience to prepare an analysis of the supply chain of precious metals (higher education, work experience in the international field of at least 3 years);
- knowledge of English at the level of professional competence;
- have the necessary resources to perform duties (software, intellectual and material resources);
- be able to communicate important information to management, employees and suppliers.

5.5. The responsibilities of the Chief LBMA Specialist include:

- collection of documented information from employees of responsible departments about counterparties, transactions, and level of risk;
- analysis of the verification of documented information relating to the precious metals supply chain;
- assessing the degree of adequacy of documented information reviews;
- preparation of annual reports.

5.6. The System requirements apply to employees of the following responsible departments:

- EEAD– External Economic Activities Directorate of Kyrgyzaltyn OJSC;
- PTD – Production and Technical Department of Kyrgyzaltyn OJSC;
- PTD – Production and Technical Department of Kyrgyzaltyn OJSC;
- Labor Protection, Safety and Environment Department of Kyrgyzaltyn OJSC;
- PCD – Process Control Department of the “Refinery” branch of Kyrgyzaltyn OJSC;
- PhChL – Physico-chemical laboratory of the “Refinery” branch of Kyrgyzaltyn OJSC;
- R&SD –Precious Metal Regime and Safety Department of the “Refinery” branch of Kyrgyzaltyn OJSC.

5.7. In relation to current and potential counterparties in the process of pre-contractual work, conclusion and execution of contracts, employees of responsible departments evaluate each counterparty participating in the supply chain of precious metals according to the following criteria:

- availability of counterparty’s documents in accordance with clause 5.8.1. - 5.8.2 of this Guidance;
- availability of a completed profile and case file of the counterparty (clauses 5.8.6 - 5.8.9);
- availability of a questionnaire with general information about the counterparty (clause 5.8.4);
- availability of the counterparty's questionnaire (clause 5.8.7);
- availability of written confirmation that the counterparty carries out its activities in accordance with the goals and principles of the LBMA guidance (clause 5.8.8);
- availability of a certificate about the counterparty;
- presence/absence of suspicious transactions on the part of the counterparty during the period of cooperation;
- presence/absence of additional risks that should be taken into account when concluding a contract, for example, geographical factor.

5.8. Based on the results of the assessment, the employee of the responsible department makes a note in the counterparty’s file and assigns a risk level.

5.8.1. In order to identify a legal entity, employees of responsible departments request copies of the following documents:

- certificate of state registration (Reg No.);
- charter;
- foundation agreement/extract from the register of shareholders;
- names of its ultimate beneficial owners (i.e. not just direct shareholders), indicating any level of ownership limit.
- all beneficial owners who are politically exposed persons and discloses regular updates;
- Information about the political roles, public importance or family relationships of the ultimate beneficial owners;
- certificate of tax registration (TIN);
- certificate of absence of tax debts and arrears with the social fund;
- certificate of registration with the social fund;
- information about bank details (BIC);
- information about telephone number and address;
- if necessary, extracts from the Unified State Register of Legal Entities;
- documents confirming the powers of the persons signing the agreement (power of attorney, order of appointment).

Information about gold:

- certificate of origin of gold;
- license for mine development;
- license for import/export of gold;
- information about gold reserves.

5.8.2. In order to identify a private entrepreneur, employees of responsible departments request:

- a passport;
- number of the PE certificate;
- certificate of state registration (Reg No.);
- certificate of tax registration (TIN);
- certificate from the National Statistics Agency (OKPO);
- information about bank details (BIC);
- information about telephone number, legal and physical addresses.

5.8.3. When studying documents in order to study your counterparty, pay utmost attention to:

- registration of foundation documents (including all registered changes and additions) of the counterparty and documents confirming the state registration of the counterparty as a legal entity;
- the composition of the founders (participants) of the legal entity, identifying among them the persons or their ultimate beneficial owners (i.e., not only direct shareholders) and the presence of sanctions and/or embargoes against them;
- relevance of documents (compliance with the date of presentation).

When establishing that a representative is acting on behalf of a counterparty, employees identify the representative, check his credentials, and also identify and study the represented counterparty.

In case of participation in financial transactions (transactions) of third parties, employees are required to obtain from the counterparty information and documents that allow them to identify and study third parties.

5.8.4. Based on the documents received from the counterparty, employees of the responsible departments fill out a questionnaire containing information about the counterparty, its activities, operations that they carry out through Kyrgyzaltyn OJSC, and other information.

5.8.5. Based on the received documents, employees of responsible departments enter the necessary information into the counterparty's profile electronically into the corporate information system:

- name;
- legal, postal addresses;
- main state registration number;
- date of registration and registering authority;
- taxpayer identification number;
- number and date of issue of the certificate of special registration/license, etc.

5.8.6. Employees of the responsible departments simultaneously create the counterparty's file on paper (folder) from the documents specified in clauses 5.8.1, 5.8.3 and a documentary review is carried out, including registration as specified in clause 5.8.5.

Documented review of the precious metals supply chain includes the following measures:

- Identification of the second party and verification of its authenticity through the use of reliable, independent primary documentation, data or information;
- Determination of the beneficial owners of the second party;

- Examination of the second party and their beneficial owners to ensure they are not on government lists of wanted money launderers or known fraudsters or terrorists;
- Obtaining detailed information about the financial and business plan relating to the other party and information about the objectives and intended character of the business relationship;

For Mined Gold:

- Identification the origin of gold based on appropriate reviews (clause 2.3, pp. 32-33 of the LBMA Responsible Gold Guidance);
- Obtaining a subsoil use license, if applicable;
- Obtaining a gold import/export license, if applicable;
- Collection and assessment of mining practices;
- Obtain data on mining volumes, if applicable.

For recycled gold:

- Identification of suppliers and sources of origin of gold based on appropriate reviews (clause 2.3, pp. 32-33 of the LBMA Responsible Gold Guidance);
- Obtaining permits for gold transactions, if applicable.
- Checking the availability and assessment of the counterparty's environmental policies and practices.

5.8.7. In order to confirm the documented results of the due diligence, employees of the responsible departments visit the gold mining site of the counterparty (to compile reports during the visit, questionnaire templates and questionnaires included in the LBMA Toolkit can be used).

5.8.8. Employees of responsible departments inform counterparties about the requirements of the LBMA Guidance by sending letters and questionnaires to counterparties (in the form of Appendix 1 or 2).

In response, the counterparty sends a completed counterparty questionnaire and confirmation of compliance of its activities with the requirements of the LBMA Guidance.

The employee of the responsible department adds the received documents to the counterparty's file.

5.8.9. The profile and files of counterparties who carry out transactions with Kyrgyzaltyn OJSC and participate in the supply chain of raw materials and precious metals are reviewed by employees of the responsible departments when concluding an agreement for the next period or once every three years in order to update the information contained in it. The storage period for documents (counterparty's file) is at least 5 years.

5.9. Heads of responsible departments instruct newly hired employees in accordance with the approved training program on the following issues:

- regulations governing the principles of managing the supply chain of precious metals and the principles of combating money laundering, and financing of terrorism;
- LBMA Responsible Gold Guidance
- Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals;
- transactions that have signs of unusual transactions (Appendix 3);
- work with documents of counterparties, formation of profiles and files of the counterparty, etc.

Current employees of responsible departments, depending on the level of risks and the nature of the work, undergo repeated training at least once a year.

The briefing is confirmed by the signature of the employee in the briefing log and the signature of the instructing person.

5.9.1 All incoming information about the counterparty, raw materials and finished products is stored electronically in the corporate information system and in paper form in the counterparty's file.

The forms of documents, the procedure for their execution, circulation, storage, accounting (monitoring) are given:

- in the instructions on the procedure for receiving, issuing precious metals and ensuring safety during their processing, storage and transportation, approved by the Chairman of Kyrgyzaltyn OJSC dated 07/12/2021;
- in technical instructions.

5.9.2. All information about the counterparty, including transactions for the purchase of raw materials and the sale of finished products, is monitored for compliance with due diligence requirements for precious metals supply chains. Information about all suspicious transactions is transmitted to the chief LBMA specialist.

5.9.3. Employees of responsible departments strive to strengthen relationships with counterparties through the following measures:

- contracts include provisions for practice guidance on how suppliers' and customers' activities comply with LBMA principles and procedures.
- information support is provided to counterparties to ensure compliance of their activities with the goals and principles of the LBMA Guidance.

5.9.4. If a counterparty violates the principles of the LBMA Guidelines, the employee of the responsible department notifies the LBMA Compliance Officer, who, in turn, documents information about the counterparty and the transaction in relation to which there are suspicions, and provides the information to the System Management Representative (in the form of an internal memo).

After receiving the resolution of the Management Representative, the chief LBMA specialist, under confidentiality conditions, sends to the LBMA a message certified by the signature of the System Management Representative and certified by the seal of Kyrgyzaltyn OJSC .

5.9.5. In order to ensure a due diligence of the supply chain of precious metals and prevent violations of the LBMA principles, Kyrgyzaltyn OJSC takes general precautions:

- packaging of each batch of goods in a sealed safe container with individual markings that prevent opening or removal of the contents of the container;
- physical separation of individual consignments until inspection is completed and acceptance is confirmed;
- involving in the assessment of consignments of goods persons who are not involved in a particular conflict of interest;
- notifying the Chief LBMA Officer of any violations;

If there are repeated problems with the same supplier, the violation is documented and action is taken to terminate or suspend the relationship.

6. Identification and assessment of risks in the supply chain

6.1. When assessing the risks associated with the supply chain of precious metals in transactions with counterparties, employees of responsible departments (see clause 4 Terms p. 4 of this Guidance) take into account:

- origin and transportation from conflict-affected or high-risk areas (*CAHRA*) by questioning counterparties;
- the degree of conflict and human rights violations during the extraction, transportation or trade of precious metals (by questioning counterparties);
- use of payment systems (official banking and informal systems);
- criminal involvement check: direct or indirect support for non-state armed groups/public policing/private policing that commit offenses or act illegally.
- ensuring the implementation of legislation aimed at combating pronounced criminal activity;
- checking information about the financing of terrorist activities and money laundering (by questioning counterparties);
- checking information about bribery and deliberate distortion of facts about the origin of precious metals (security departments of Kyrgyzaltyn OJSC);
- compliance with legal requirements in the field of environmental protection;
- compliance with the international cyanide management code.

6.2. Employees of responsible departments study and assess the risks of counterparties (including new counterparties), whose activities may be associated with risk factors, by:

- identification of the counterparty at the stage of pre-contractual work in accordance with clause 5.8. of this Guidance;
- annual review of transaction documentation using a random selection method.

6.3. The main signs of unusual transactions in gold and precious metals, which may be associated with conflicts or serious offenses in the field of mining, transportation, refining and (or) trading are given in Appendix 3.

6.4. In the event of new risks in the supply chain of precious metals, suspicions of non-compliance with measures to combating terrorism, fraud, bribery, human rights violations, conflict, direct or indirect support of non-state armed groups, employees can send (including anonymously) information to the postal address priemnaya@kyrgyzaltyn.kg. Messages are monitored by the Chief LBMA Specialist and he/she rechecks the information received together with the security departments of Kyrgyzaltyn OJSC. Further actions are carried out in accordance with clause 5.9.4. of this Guidance.

6.5. The risk assessment of the supply chain of precious metals in terms of mining, transportation, refining and trade is carried out in the form of Appendix No. 5 to this guidance. Responsible departments conduct risk assessments according to the **high-risk** criteria specified in clause 7.2.3. of this Guidance.

6.6. The method for identifying and assessing supply chain risks is reviewed quarterly and approved by the Management Representative.

7. Development and implementation of risk mitigation/risk management measures

7.1. As part of identifying the counterparty, as well as during operations and transactions, employees of responsible departments assess and assign to the counterparty a degree (level) of risk: **high, medium, low**.

Employees of responsible departments assess the degree (level) of risk based on documents received from the counterparty, questionnaires and information from various sources, identified signs of unusual transactions with gold and silver, which may be associated with terrorism, fraud, bribery, human rights violations, conflicts, direct or indirect support to non-state armed groups in mining, transportation, refining and trade.

7.2. In order to mitigate adverse consequences, Kyrgyzaltyn OJSC has developed measures based on general principles, standards and procedures for reliable management of the precious metals supply chain accepted in international practice.

7.2.1. The assessment of the degree (level) of risk, as well as the rationale for the risk assessment, are recorded by employees of structural units responsible for carrying out operations (transactions) with counterparties, in the form of **Appendix 4**, and are stored in the counterparty's file.

If risks are identified, the employee of the responsible department notifies the chief LBMA specialist, who makes a decision on the risk management mechanism in relation to this counterparty (clause 7.2.3).

7.2.2. Physical separation and protection of individual consignments of goods within a supply chain associated with risk factors.

7.2.3. If risks are identified or if additional verification of the supplier is necessary, Kyrgyzaltyn OJSC has developed risk mitigation mechanisms, including:

- continued cooperation and consultation with the supplier on the possibility of reducing risks;
- temporary suspension of interaction with the supplier(s), whose activities are associated with risk factors, while continuing measures to reduce assessable risks;
- termination of cooperation with suppliers whose activities involve risk factors. If they do not use risk reduction means and (or) if such means are inappropriate and (or) unacceptable from the standpoint of analyzing the costs and benefits and capabilities of Kyrgyzaltyn OJSC.

7.2.4. Supply chain risks

Level of risk	Risk Management Framework	Reassessment of risk
Low	<u>The counterparty will commit to improving the strategy while establishing clear performance targets within one year of determining low risk.</u>	Once every 12 months
Average	If, according to the results of a documentary audit of the supply chain of precious metals, there is a likelihood of money laundering, terrorist financing, participation in the formation of a conflict or violation of human rights, Kyrgyzaltyn OJSC will suspend the processing of gold coming from this source until additional information/data on confirmation is received or refuting this preliminary assessment.	Once every 6 months
High	The following minimum criteria should be considered as high risk categories: <ul style="list-style-type: none"> • Mined Gold or Recycled Gold originates from, is transported from, or is transported through Conflict Affected Areas or High Risk Areas (CAHRA) regarding human rights abuses; 	Once every 6 months

	<ul style="list-style-type: none"> • It is required that the Mined Gold to originate from a country that has limited known reserves, preferably resources or expected levels of gold production; • Recycled Gold originates from a country in which gold from Conflict Affected Areas or High Risk Areas (<i>CAHRA</i>) with a high risk of human rights violations is known or suspected to be transported; • Gold is mined through artisanal mining; • Mined Gold or Recycled Gold is produced using mercury; • Mined Gold or Recycled Gold originates from areas within the boundaries of World Heritage Sites; • The gold supplying counterparty or other known mining companies are located in a country that poses a high risk for money laundering, crime or corruption; • The gold supplying counterparty or other known mining companies, or their beneficial owners, are politically exposed persons (politically exposed persons involved in corrupt and illegal activities) (<u>see definition p.10 of the LBMA Responsible Gold Guidance</u>); • The gold supplying counterparty or other known mining companies have active high-risk business activities such as military activities, gaming and casino industries, antiques or art, diamond trading, cults and their leaders. <p>The criterion for the high-risk precious metals supply chain at Kyrgyzaltyn OJSC is the beginning or continuation of cooperation</p> <p>OR</p> <p>If, according to the results of a documentary audit of the gold supply chain, there are any high-risk criteria, or if the problems of intolerance mentioned above are identified, or their likelihood is very high, Kyrgyzaltyn OJSC considers suspending/terminating interaction with suppliers until eliminating high-risk criteria in accordance with the introduction of the Corrective Action Plan of Kyrgyzaltyn OJSC.</p> <p><u>Measures</u>: measures are taken to train the counterparty, after which an agreement is concluded.</p> <p>Risk reassessment is carried out 6 months after determining a high risk by re-requesting a completed Counterparty Questionnaire. Documented information will be stored in the counterparty's file in electronic form in the corporate information system.</p>	
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7.2.5 Zero tolerance supply chains

If intolerance issues are identified, the Refinery should not enter into a business relationship with the gold supplying counterparty or should immediately terminate the existing relationship. (Clause 2.2 of the LBMA Responsible Gold Guidance).

7.2.6 Zero tolerance issues include, but are not limited to:

- The Mined gold comes from areas within the boundaries recognized as World Heritage Sites.
- The mined gold or recycled gold was mined in violation of international sanctions (including but not limited to UN, EU, UK and US sanctions).
- The counterparty supplying Mined or Recycled Gold, other known mining companies or their Ultimate Beneficial Owners are known to be involved in illegal money laundering processes, fraudsters or terrorists, or are involved in serious human rights violations, or in direct or indirect support of illegal non-state armed groups.

Corrective Action Plan

In the event that the counterparty's enhanced due diligence is not satisfactory, but if it is concluded that the counterparty is making reasonable and good faith efforts to bring its activities into compliance with these Guidance, the Refinery may continue to refine gold (Section 2.2 of the LBMA Responsible Gold Guidance).

At the same time, the counterparty shall comply with the terms of the Corrective Action Plan aimed at improving activities and reducing risks in the gold supply chain, introduced by the chief officer of Kyrgyzaltyn OJSC to comply with LBMA requirements.

8. Audit

8.1 In order to carry out a systematic and independent analysis to determine the compliance and effectiveness of the precious metals supply chain management system and compliance with LBMA standards, internal and external audits are conducted annually at Kyrgyzaltyn OJSC.

8.2 During the audit process, the following indicators are checked:

- the adequacy of the methods and activities of Kyrgyzaltyn OJSC aimed at implementing the recommendations contained in the LBMA Practical Guidance;
- availability of adequate external and internal means of risk mitigation;
- compliance with the recommendations contained in the LBMA Practical Guidance in all types of interaction with suppliers of gold and precious metals;
- ensuring the safety of gold and precious metals, the presence of an effective system for tracking information on all types of activities of the Enterprise;

- continuous risk assessment and timely response to the situation based on the results of such assessment.

8.3 Company performing external audit of Kyrgyzaltyn OJSC shall meet the following criteria:

- be accredited by LBMA and be on the list of recommended LBMA auditors. This list is published on the website (www.lbma.org.uk);
- independence from the Company being audited; no conflict of interest between the auditor and the Company being audited (business or financial relationship);
- inadmissibility of providing the inspected Company with any other services in connection with due diligence, except for recommendations on improving methods for conducting due diligence;
- the competence required to carry out such an audit.

8.4. The audit process includes the following operations:

- preparation for the audit, development of a plan;
- on-site inspection with visit;
- consultation interviews with a group of specialists from Kyrgyzaltyn OJSC involved in risk assessment;
- completion of the audit: justification, documentation and report on the results obtained, indicating the level of compliance of the audited Kyrgyzaltyn OJSC with LBMA recommendations when conducting a supply chain compliance assessment;
- provision of recommendations to Kyrgyzaltyn OJSC to improve methods for conducting due diligence;
- a brief audit report should be included in the annual report of Kyrgyzaltyn OJSC on the examination of the compliance of the supply chain of precious metals.

9. Annual reports

- 9.1. The Chief LBMA Specialist prepares a report on the compliance of the Precious Metals Supply Chain Management System with the established requirements of LBMA Guidance and the measures taken.
- 9.2. The report is provided to the Management Representative, who generates an overall report on the performance of the System and sends it to LBMA.
- 9.3. Reports can be published on the website of Kyrgyzaltyn OJSC.

10. Appendices

Appendix 1

Counterparty questionnaire (LBMA) – Mined Gold

1. CONTRACTOR'S DETAILS	
a. Name	
b. Registered Address	
c. Business Address	
d. Phone Number	
e. Date of Incorporation	
f. Country of Incorporation	
g. Business Registration Number	
h. Tax Identification Number	
i. VAT Number	
j. If listed, indicate name of stock exchange(s) and ticker	
k. Website	
l. External Financial Auditors Since Date	
m. How many direct and indirect subsidiaries does the company have? <i>Please provide a group chart, a full list of beneficiaries</i>	
n. Contact Person of the Company	

<p>o. Has the Company, its ultimate beneficial owner(s) or member of top management been subject to legal proceedings or under investigation by national or international authorities (past 5 years/current)?</p> <p>Please describe</p>	
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2. BUSINESS ACTIVITY

<p>a. Type of Business</p>	<p>Large scale mine (>100'000 oz/year) <input type="checkbox"/> Precious Metals trader <input type="checkbox"/></p> <p>Medium scale mine (30-100'000 oz/year) <input type="checkbox"/> Others, please specify: <input type="checkbox"/></p> <p>Industrial Small scale mine (<30'000 oz/year) <input type="checkbox"/> _____</p>
<p>b. Description of the Main Type of Activity</p>	
<p>c. In which countries do you currently refine your precious metals?</p>	

3. BENEFICIAL OWNERS

SHAREHOLDERS(S) MORE THAN 25%

Percentage Holding (%)	Name	Address	Country of Incorporation/ Nationality	Date of Incorporation/ Date of Birth

ULTIMATE BENEFICIAL OWNER (MORE THAN 25% - INDIVIDUAL ONLY)

Percentage Holding (%)	Name	Address	Nationality(ies)	Date of Birth

4. MANAGEMENT STRUCTURE				
	Name	Title	Nationality	Date of Birth
a. Board of Directors				
b. Senior managers				

5. FINANCIAL INFORMATION		
5.1 Financial statements details		
	Currency	Last Reporting Period (Year)
a. Total Shareholder's Equity		
b. Overall balance		
c. Turnover		
d. Net proceeds		

Please provide copy of latest annual report

5.2 Other Financial Information									
e. Source of mining operation funding	<input type="checkbox"/> Own equity <input type="checkbox"/> Government entity, name(s): _____ <input type="checkbox"/> Bank loan, name(s) _____ <input type="checkbox"/> Other third-party loan, name(s) _____								
f. What usual payment method does the Company use to pay its suppliers?	<table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 60%;">Payment type</th> <th style="width: 40%;">Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Bank transfers</td> <td></td> </tr> <tr> <td>Checks</td> <td></td> </tr> <tr> <td>Cash</td> <td></td> </tr> </tbody> </table>	Payment type	Percentage (%)	Bank transfers		Checks		Cash	
	Payment type	Percentage (%)							
	Bank transfers								
	Checks								
Cash									

6. REGULATORY FRAMEWORK		YES	NO	N/A
a. Does your Company need to comply with the following regulations in the country/province of operations? <ul style="list-style-type: none"> • Health and safety; • Environmental; • Labour; • Anti-bribery & corruption. 				
b. Is child labour regulated in mining activity in the country / province of operations?				
c. Has your Company been fined or prosecuted for a breach to the following regulations in the country/province of operations? <ul style="list-style-type: none"> • Health and safety; • Environmental; • Labour; • Anti-bribery & Corruption; • Taxes. 				
If yes, please describe how it has been mitigated				
d. Is the mining site(s)/processing plant legally required to hold a mining/operational license? <i>Please provide a copy of the mining license.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No Date of issue: _____ Expiry date: _____			

<p>e. Is the mining site(s) legally required to hold an environmental license/permission?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Please provide a copy of the environmental license/permission.</i></p>	<p>Date of issue: _____</p> <p>Expiry date: _____</p>
<p>f. Did the Regulator responsible for mining operations carry out an on-site visit?</p>	
<p>g. If no on-site visit has yet been performed (question above), is there any visit planned?</p>	<input type="checkbox"/> Yes, date of planned visit : _____ <input type="checkbox"/> No
<p>h. Is your Company legally required to have a license to export precious metals?</p>	<input type="checkbox"/> Yes – Please provide a copy Date of issue: _____ Expiry date: _____ <input type="checkbox"/> No <input type="checkbox"/> N/A

<p>7. GOVERNMENT PAYMENTS</p>	
<p>a. Please describe the framework relating to tax/fees/royalties paid to government agencies and officials (taxes on the extraction, trade, transport and export of gold)</p>	
<p>b. Does your Company make financial and in-kind political contributions, whether directly or through an intermediary?</p> <p>If yes, do you have a policy on that matter?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
<p>c. Do you apply the Extractive Industries Transparency Initiative (EITI) guidelines?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

8. HUMAN RESOURCES	
a. Number of employees within the Company	
b. Number of employees within the Group	
<p>c. What practices have been put in place in your work force to:</p> <ul style="list-style-type: none"> • ensure inclusion (for e.g., gender, ethnicity, religion, etc) • prevent bullying, harassment and discrimination • ensure fair remuneration compared to relevant national and local benchmarks, norms and regulation <p>Please provide relevant policies covering these topics</p>	
<p>d. Do you have a code of conduct on business integrity and ethical conduct?</p> <p>Please provide copies</p>	
e. Is freedom of association or collective bargaining allowed within the Company?	
<p>f. Do you have a fair, accessible, effective and timely grievance mechanism in place for workers?</p> <p><i>Please describe</i></p>	
g. Do you have employees under the age of 18 in the hazardous mining operations?	
<p>h. Does your Company:</p> <ul style="list-style-type: none"> • offer free access to all employees appropriate Personal Protective Equipment (PPE); • provide regular documented Health & Safety training; • offer to all employees health monitoring and screening to prevent workplace illness. 	
i. Does the Company use accident rate as a Key Performance Indicator?	
j. What is the past 12 months record on accident rate?	

9. ORIGIN OF PHYSICAL PRECIOUS METALS, CAPACITY AND MINING PRACTICES

a. From how many mining site(s) is the gold extracted?	
b. Name of the mining site(s)	
c. Where exactly is the mining site(s) located (country, province, closest city, GPS coordinates)?	
d. In which perimeter (km) around the centre of operation/processing plant is the mining site(s) located?	
e. What is the daily production of the mining site(s)?	
f. What are the estimated reserves of the mining sites(s)?	
g. Are you operating an open pit or an underground mine?	
h. What is the gold extraction method (mining equipment & methods)?	
i. Does the mine source from artisanal miners on its concession?	<input type="checkbox"/> Yes, please describe: <input type="checkbox"/> No
j. Does the mine source ore or doré from mines outside its concession?	<input type="checkbox"/> Yes, Name and location of the mine: _____ <input type="checkbox"/> No

10. PROCESSING PLANT

a. Where exactly is the gold processing plant(s) located (country, province, closest city, GPS coordinate)?	
b. Is the gold processing plant held by the mining company or is it outsourced to an external party?	<input type="checkbox"/> Mining company processing plant <input type="checkbox"/> Gold processing outsourced to an external plant Name: _____

b. Is the gold processing plant held by the mining company or is it outsourced to an external party?	<input type="checkbox"/> Mining company processing plant <input type="checkbox"/> Gold processing outsourced to an external plant Name: _____
c. If the Mining Company has its own processing plant, does it also source mined gold for processing from external parties?	<input type="checkbox"/> Yes Name and location of mining sites: _____ <input type="checkbox"/> No
d. What is the gold processing method (processing equipment & methods)?	
e. What chemical products are used during processing?	<input type="checkbox"/> Mercury <input type="checkbox"/> Cyanide <input type="checkbox"/> Others, please specify: _____
f. Do you have practices in place to properly manage transportation, handling, storage and disposal of all hazardous materials??	
g. If cyanide is used, is the transportation, storage, use and disposal in line with the International Cyanide Management Code?	<input type="checkbox"/> Yes <input type="checkbox"/> Plan to comply <input type="checkbox"/> No
h. What is the capacity of the processing plant per day?	

11. MATERIALS	
a. What type of precious metals is the Company planning to send for refining? <input type="checkbox"/> Gold <input type="checkbox"/> Others, please specify: _____	
b. What is the form of precious metals planned to be sent for refinin? <input type="checkbox"/> Gold concentrate <input type="checkbox"/> Mining wastes <input type="checkbox"/> Gold ore <input type="checkbox"/> Others, please specify: _____	

12. COMMUNITY ENGAGEMENT	
a. Do you have Community Engagement Programs (incl. for vulnerable or marginalised groups)? Do you have a person responsible for Community Relationship?	
b. Has there been any issue with the Community over the past 24 months?	
c. What are the positive impacts on mining activities on the community (incl. women, children, Indigenous Peoples and other potentially vulnerable or marginalised groups)?	
d. Do you have a fair, accessible, effective and timely stakeholders' grievance mechanism in place?	<input type="checkbox"/> Yes, please describe <input type="checkbox"/> No
e. Are you or have you had to resettle local communities? If yes, have you proceeded on the following basis: - consultation with affected communities; - restoration of established livelihoods n; - provision of fair and timely compensation. Please describe	
13. SECURITY (MINING SITE / PROCESSING PLANT)	
a. What are the security methods used at the mining site?	<input type="checkbox"/> Internal Private security force <input type="checkbox"/> Outsourced security force <input type="checkbox"/> Public security force – if yes (use of public forces), is there a Memorandum of Understanding in line with UN Voluntary Principles on Security and Human Rights in place?
b. Are the security guards armed?	<input type="checkbox"/> Yes, please describe: <input type="checkbox"/> No
c. What kind of training has the security personnel received? Is it in line with the UN Voluntary Principles on Security and Human Rights?	
d. Are there any armed groups stationed near the mine site (other than security provider)?	<input type="checkbox"/> Yes <input type="checkbox"/> State Armed group

If yes, please provide information as to the reason:	<input type="checkbox"/> Non-State Armed Group <input type="checkbox"/> Public or private security forces <hr/> <input type="checkbox"/> No
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14. TRANSPORTATION

a. How is the ore transported from the mining sites to the processing plant?

By a third party (external company), which company? _____

b. How is the doré transported from the processing plant to the export location?

- Truck Helicopter Armoured vehicle Aircraft
 Others, please specify

By a third party (external company), which company? _____

- Truck Helicopter Armoured vehicle Aircraft

Others, please specify

c. How will the doré be transported from the export location to the refinery?

- Aircraft Helicopter Armoured vehicle Others, please specify:

By a third party (external company), which company? _____

- Truck Helicopter Armoured vehicle Others, please specify:

c. Is there any military/police checkpoint along the road from the mining site until the export location?

Yes
 If yes, how many and for what purpose?

No

15. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY / HUMAN RIGHT POLICY

<p>a. Did your company establish a responsible supply chain of gold from conflict-affected and high-risk areas policy which is consistent with the standards set forth in the model supply chain policy in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?</p>	<p><input type="checkbox"/> Yes – Please provide a copy</p> <p><input type="checkbox"/> No</p>
<p>b. Does your company comply or plan to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?</p>	
<p>c. Does your company comply with any of the following industry initiatives?</p> <p><input type="checkbox"/> RJC Chain of Custody Standard</p> <p><input type="checkbox"/> RJC Code of Practices</p> <p><input type="checkbox"/> WGC Conflict Free Gold Standard</p> <p><input type="checkbox"/> WGC Responsible Gold Mining Principles</p> <p><input type="checkbox"/> Fairtrade Standard</p> <p><input type="checkbox"/> Fairmined Standard</p> <p><input type="checkbox"/> International Council on Mining and Metals</p> <p><input type="checkbox"/> Extractive Sector Transparency Measures Act (ESTMA)</p> <p><input type="checkbox"/> Others, please specify: _____</p> <p><i>Please provide copy of the certificate</i></p>	<p>Additional Comments:</p>
<p>d. Do you have a Human Right Policy in place?</p>	

16. ENVIRONMENT / CLIMATE CHANGE

<p>a. At what stage are you in your greenhouse gas emissions (ex: carbon dioxide, methane, nitrous oxide, F-gases, etc) reduction journey?</p> <p><i>i.e.: Scope 1: Direct GHG emissions that occur from sources that are owned or controlled by the company, for example, emissions from combustion in owned or controlled boilers, furnaces, vehicles, etc.; emissions from chemical production in owned or controlled process equipment. Scope 2: Electricity indirect GHG emissions and accounts for GHG emissions from the generation of purchased electricity consumed by the company. Scope 3: Other indirect GHG emissions that are a consequence of the activities of the company but occur from sources not owned or controlled by the company. Some examples of scope 3 activities are extraction and production of purchased materials; transportation of purchased fuels; and use of sold products and services.</i></p> <p>If applicable, what are your current greenhouse gas emissions (for Scope 1 and 2 of the GHG Protocol? Please report in metric tons of carbon dioxide equivalent (tCO₂e)</p> <p>Have you set targets to reduce your GHG emission in Scope 1 and 2? If yes, please list each target. If no, do you plan on doing so in the next five years</p>	<p><input type="checkbox"/> Not started</p> <p><input type="checkbox"/> Internal reflection</p> <p><input type="checkbox"/> Evaluation of our current GHG emission (Scope 1 and 2)</p> <p><input type="checkbox"/> Evaluation of your GHG emission (Scope 1, 2,3)</p> <p><input type="checkbox"/> Target setting</p>
<p>b. Is the mining site located in a water-stressed area?</p> <p>If yes, have you taken proportionate and practicable steps to manage efficiency of your water usage?</p>	
<p>c. Does your company have a mine closure plan in place; including:</p> <ul style="list-style-type: none"> - rehabilitation of land; - preservation of water sources; - prevention of land pollution. 	
<p>d. Does your company have a biodiversity management plan to ensure that there is at least no net loss of critical habitat?</p>	

e. Does your Company have an environmental incident plan (incl. tailings dam failure)?	
f. Are the mining site(s) located close to a World Heritage Site?	
g. Are the mining site(s) located in a Protected Area? (source: protected planet - https://www.iucn.org)	

17. ANTI MONEY LANDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)	
a. Is your company subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation?	<input type="checkbox"/> Yes – Please fill in the Wolfsberg questionnaire attached <input type="checkbox"/> No
b. Name of the AML-CFT Law/Regulation	
c. Name of the Regulator	
d. Did your company establish a conformity program that contains AML/CFT policies and procedures, according to internal & international laws, rules and standards?	<input type="checkbox"/> Yes – Please provide a copy <input type="checkbox"/> No

18. ANTI-BRIBERY POLICY	
a. Does your Company have an anti-bribery policy in place?	<input type="checkbox"/> Yes – Please provide a copy <input type="checkbox"/> No
b. Has the company or the Senior Management ever been charged for violation of applicable anti-bribery laws or regulations?	<input type="checkbox"/> Yes – Please provide details <input type="checkbox"/> No

19. AUTHORISED SIGNATORIES - Please provide ID copies

First Name:	Last Name:	Signature Specimen
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	
First Name:	Last Name:	Signature Specimen
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	
First Name:	Last Name:	Signature Specimen
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	
First Name:	Last Name:	Signature Specimen
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	

SIGNATURE _____

I hereby declare that the information given above is true and accurate as of the date of writing.

I undertake to automatically and promptly inform the refinery of any material changes.

	Authorised signatory	Authorised signatory
Signature:		

Print Name:		
Title:		
Company Name:		
Date and Location:		

**ATTACHMENT – TO BE FILLED IN ONLY FOR COMPANY
SUBJECT TO AML-CFT REGULATION**

Wolfsberg Anti-Money Laundering Questionnaire		
Corporate Name:		
Location:		
If you answer “no” to any question, please ensure that an explanation and additional information is supplied at the end of the relevant section.		
I General AML Policies, Practices and Procedures:	Yes	No
1. Is the AML compliance program approved by the Corporate’s board or a senior committee?		
2. Does the Corporate have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML framework?		
3. Has the Corporate developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?		
4. In addition to inspections by the government supervisors/regulators, does the corporate client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?		
5. Does the Corporate have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group).		
6. Does the Corporate have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?		
7. Does the Corporate have policies covering relationships with politically exposed persons (PEP’s), their family and close associates?		
8. Does the Corporate have record retention procedures that comply with applicable law?		
9. Does the Corporate require that its AML policies and practices be applied to all branches and subsidiaries of the corporate both in the home country and in locations outside of the home country?		

<i>II. Risk Assessment</i>	Yes	No
10. Does the Corporate have a risk-based assessment of its customer base and transactions?		
11. Does the Corporate determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the Corporate has reason to believe pose a heightened risk of illicit activities at or through the Corporate?		
<i>III. Know Your Customer, Due Diligence and Enhanced Due Diligence</i>	Yes	No
12. Has the Corporate implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?		
13. Does the Corporate have a requirement to collect information regarding its customers' business activities?		
14. Does the Corporate assess its FI customers' AML policies or practices?		
15. Does the Corporate have a process to review and, where appropriate, update customer information relating to high risk client information?		
16. Does the Corporate have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information?		
17. Does the Corporate complete a risk-based assessment to understand the normal and expected transactions of its customers?		
<i>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</i>	Yes	No
18. Does the Corporate have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?		
19. Where cash transaction reporting is mandatory, does the Corporate have procedures to identify transactions structured to avoid such obligations?		
20. Does the corporate screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?		
21. Does the Corporate have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?		
<i>V. Transaction Monitoring</i>	Yes	No

22. Does the Corporate have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travellers checks, money orders, etc.		
VI. AML Training	Yes	No
23. Does the Corporate provide AML training to relevant employees that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the Corporation’s products and services and internal policies to prevent money laundering?		
24. Does the Corporate retain records of its training sessions including attendance records and relevant training materials used?		
25. Does the Corporate communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?		
27. If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities; • Examples of different forms of money laundering involving the Corporate’s products and services • Internal policies to prevent money laundering 		

Space for additional information (Please indicate which question the information is referring to):

Attachment 2

LBMA RGG Questionnaire – Recyclable Gold

1. COUNTERPARTY DETAILS	
a. Name	
b. Registered Address	
c. Business Address	
d. Phone Number	
e. Date of Incorporation	
f. Country of Incorporation	
g. Business Registration Number	
h. Tax Identification number	
i. If listed, indicate name of stock exchange(s) and ticker	
j. Website	
k. External Financial Auditors	
l. How many direct and indirect subsidiaries does the company have? <i>Please provide a Group chart</i>	
m. Contact Person of the Company	
n. Has the Company, its ultimate beneficial owner(s) or member of top management been subject to legal proceedings or under investigation by national or international authorities (past 5 years/current)? Please describe	

2. BUSINESS ACTIVITY

a. Type of Business	Bank	<input type="checkbox"/>	Jeweller	<input type="checkbox"/>
	Precious Metals Trader/Dealer	<input type="checkbox"/>	Scrap dealer/pawn shop	<input type="checkbox"/>
	Other Financial Intermediary	<input type="checkbox"/>	Coins dealer	<input type="checkbox"/>
	Industrial company	<input type="checkbox"/>	Mint	<input type="checkbox"/>
	Wholesale	<input type="checkbox"/>	Others:	<input type="checkbox"/>
	Refinery	<input type="checkbox"/>	_____	
b. Description of core business activity				
c. Description of other business activities, if any				
d. Does the company hold a specific license to conduct its business(es)??	<input type="checkbox"/> Yes – Please provide a copy Date of issue: Expiry date: <input type="checkbox"/> No <input type="checkbox"/> N/A			
e. Main Market				
f. Main Products				

3. BENEFICIAL OWNERS

SHAREHOLDERS(S) MORE THAN 25%

Percentage Holding (%)	Name	Address	Country of Incorporation/ Nationality(ies)	Date of Incorporation/ Date of Birth

**ULTIMATE BENEFICIAL OWNER -
SHAREHOLDERS(S) MORE THAN 25% - INDIVIDUAL ONLY**

Percentage Holding (%)	Name	Address	Nationality(ies)	Date of Birth

4. MANAGEMENT STRUCTURE

	Names	Title	Nationality(ies)	Date of Birth
a. Board of Directors				
b. Management				

5. FINANCIAL INFORMATION

	Currency	Last Reporting Period (year)
a. Shareholder's Equity		

b. Total Shareholder's Equity		
c. Overall balance		
d. Turnover		
e. Net proceeds		

Please provide copy of latest annual report

6. HUMAN RESOURCES	
a. Number of Employees within the Company	
b. Number of Employees within the Group	

7. ORIGIN OF PHYSICAL PRECIOUS METALS	
a. From whom do you source your precious metal products?	
Bank <input type="checkbox"/>	Jeweller <input type="checkbox"/>
Precious Metals Trader/Dealer <input type="checkbox"/>	Scrap dealer/pawn shop <input type="checkbox"/>
Other Financial Intermediary <input type="checkbox"/>	Coins dealer <input type="checkbox"/>
Industrial <input type="checkbox"/>	Mint <input type="checkbox"/>
Wholesaler <input type="checkbox"/>	Others, please specify <input type="checkbox"/>
Refinery <input type="checkbox"/>	
Individuals <input type="checkbox"/>	
b. List all country(ies) of origin of precious metals delivered to you	
c. Do the precious metals supply by you originate from/transit to a conflict affected and human right abuse high risk areas (CAHRA) as defined on the EU CAHRA list?	

d. Is the Company legally required to have a licence to import precious metals?	<input type="checkbox"/> Yes – Please provide a copy Date of issue: Expiry date: <input type="checkbox"/> No <input type="checkbox"/> N/A
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8. FACILITIES	YES	NO	N/A
a. Does the Company have any melting or refining facilities?			
b. Does the Company have production facilities?			
c. Does the Company produce its own jewellery?			
d. What are the types, forms and percentage of precious metals sourced by the Company? <input type="checkbox"/> Recycled precious metals (% _____) <input type="checkbox"/> LBMA GD Bullion <input type="checkbox"/> Non LBMA Good Delivery Bullion (Au=>995/AG=>9999) <input type="checkbox"/> Rudimentary Bars <input type="checkbox"/> Jewellery <input type="checkbox"/> Broken jewellery <input type="checkbox"/> Coins <input type="checkbox"/> Collected waste <input type="checkbox"/> Others, please specify <input type="checkbox"/> Primary material – mined precious metals (% _____)			
e. What type of precious metals is the Company planning to send for refining? <input type="checkbox"/> Gold <input type="checkbox"/> Others, please specify: <input type="checkbox"/> Silver _____			
f. What is the form of precious metals planned to be sent for refining? <input type="checkbox"/> Unprocessed, recycled precious metals <input type="checkbox"/> LBMA GD Bullion <input type="checkbox"/> Non LBMA Good Delivery Bullion (Au=>995/AG=>9999) <input type="checkbox"/> Coins <input type="checkbox"/> Jewellery <input type="checkbox"/> Broken jewellery <input type="checkbox"/> Own production waste <input type="checkbox"/> Collected waste <input type="checkbox"/> Others, please specify <input type="checkbox"/> Melted recycled precious metals _____ <input type="checkbox"/> Rudimentary Bars (undefined dimension and fineness) <input type="checkbox"/> Others, please specify _____			

9. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY

<p>a. Did your institution establish a responsible supply chain of gold from conflict-affected and high risk areas policy which is consistent with the standards set forth in the model supply chain policy in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas? http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf</p>	<p><input type="checkbox"/> Yes</p> <p>Please provide a copy</p> <p><input type="checkbox"/> No</p>
<p>b. Does your institution comply or plan to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?</p>	<p><input type="checkbox"/> Currently complies</p> <p><input type="checkbox"/> Plans to comply</p> <p><input type="checkbox"/> No</p>
<p>c. Is the company complying with any of the following industry Initiatives/Regulations:</p> <p><input type="checkbox"/> LBMA Responsible Gold Guidance</p> <p><input type="checkbox"/> RJC Chain of Custody Standard</p> <p><input type="checkbox"/> (WGC Conflict Free Gold Standard)</p> <p><input type="checkbox"/> (Conflict Free Smelter Program)</p> <p><input type="checkbox"/> Others, please specify: _____</p>	<p>Additional comments:</p>
<p>d. What procedures are in place to verify that precious metals purchased were not used to finance armed conflicts?</p>	

10. ANTI MONEY LANDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)	
a. Is your institution subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation?	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Name of the AML-CFT Law/Regulation	
c. Name of the Regulator	
d. Has your institution established a conformity program that contains AML/CFT policies and procedures, according to internal & international laws, rules and standards?	<input type="checkbox"/> Yes – Please provide a copy <input type="checkbox"/> No

11. ANTI-BRIBERY POLICY	
a. Does your Company have any anti-bribery policy in place?	<input type="checkbox"/> Yes – Please provide a copy <input type="checkbox"/> No
b. Has the Company or its senior management been charged in any country in the world for violation of anti-corruption laws?	<input type="checkbox"/> Yes – Please provide details <input type="checkbox"/> No

12. PRECIOUS METALS SUPPLIERS DUE DILIGENCE QUESTIONNAIRE	
<i>Organization</i>	
a. Does the Company have a person responsible (Compliance Officer) for all AML-CFT matters (Due Diligence, AML policies, internal training)?	
If yes, please provide us with his/her name, phone number and e-mail address.	
b. Does the Company have a person responsible for all responsible supply chain matters?	
c. Is the Company subject to an AML-CFT audit by an independent party or a governmental party?	
Date of your last AML-CFT compliance audit:	

d. Does the Company have an AML-CFT training for the employees?

e. Does the Company have a responsible supply chain training for the employees?

f. Does the Company delegate to third parties some of the due diligence functions to be carried out?

If yes, what functions and to which company do you delegate?

g. How long does the Company keep its due diligence files (records)?

h. What type of information does the Company request from its precious metals suppliers type?

Companies	YES	NO	Individuals	YES	NO
Company name	<input type="checkbox"/>	<input type="checkbox"/>	Name and first name	<input type="checkbox"/>	<input type="checkbox"/>
Address	<input type="checkbox"/>	<input type="checkbox"/>	Address	<input type="checkbox"/>	<input type="checkbox"/>
Date of Incorporation	<input type="checkbox"/>	<input type="checkbox"/>	Date of birth	<input type="checkbox"/>	<input type="checkbox"/>
Country of Incorporation	<input type="checkbox"/>	<input type="checkbox"/>	Nationality	<input type="checkbox"/>	<input type="checkbox"/>
Business register extract or equivalent document	<input type="checkbox"/>	<input type="checkbox"/>	Copy of ID card or passport	<input type="checkbox"/>	<input type="checkbox"/>
Beneficial Owners	<input type="checkbox"/>	<input type="checkbox"/>	Beneficial Owners	<input type="checkbox"/>	<input type="checkbox"/>
Origin of Precious Metals	<input type="checkbox"/>	<input type="checkbox"/>	Origin of Precious Metals	<input type="checkbox"/>	<input type="checkbox"/>
Description of main activity and financial information	<input type="checkbox"/>	<input type="checkbox"/>	Supplier profile (activity, wealth, etc.)	<input type="checkbox"/>	<input type="checkbox"/>
Tax conformity declaration	<input type="checkbox"/>	<input type="checkbox"/>	Tax conformity declaration	<input type="checkbox"/>	<input type="checkbox"/>
Supply chain policy or procedures	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

i. Does the Company have a risk-based assessment of its precious metals suppliers (e.g. low, medium or high risks) based on?

- **Location of the counterparty/supply chain**
- **Profile of the counterparty**
- **Supply chain risk (product)**

j. Does the Company screen precious metals suppliers and transactions against lists of persons, entities or countries issued by government/competent authorities?

k. Does the Company perform enhanced due diligence for high risk precious metals suppliers/supply chains?

l. Does the Company assess its corporate precious metals suppliers' AML-CFT procedures and practices?

Transaction monitoring

m. Does the Company perform a risk-based assessment to understand the normal and expected transactions of its suppliers (in order to identify the unusual transactions)?

n. Does the Company have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments (e.g. traveller's cheques) or third party payments?

o. Does the Company have to register all purchases and sales?

p. To which of the following suppliers does the Company purchase its precious metals and what is the average amount of purchase by deal?

Supplier type	percentage (%)	Average amount in USD per deal
Bank		
Corporate		
Cash		

q. What usual payment method does the Company use to pay its precious metals suppliers?

Payment type	Percentage (%)
Bank transfers	
Checks	
Cash	

r. Does the Company have procedures in place to identify transactions that are structured to avoid such liabilities?
s. How many suspect reports has the Company filled and handed over to the relevant Authority the last two years?
t. Does the Company have a maximum amount as per internal policy or regulatory framework: <ul style="list-style-type: none"> • amount allowed for cash payment? If yes, how much? • amount of deal per supplier in USD? If yes, how much?
u. Where cash transaction reporting is mandatory, does the Company have procedures to identify transactions structured to avoid such obligations?

13. TRANSACTION MONITORING ON PURCHASE FROM INDIVIDUALS ONLY <i>- TO BE FILLED ONLY BY COMPANY PURCHASING PRECIOUS METALS FROM INDIVIDUALS</i>	YES	NO	N/A
a. Does the Company keep statistics on purchases of precious metals from individuals to identify suspicious transactions?			
b. Does the Company have a specific procedure in case a transaction with an individual is significantly higher than the average transaction? If yes, please comment: _____			
c. Is the Company able to verify that an individual does not carry out multiple transactions simultaneously for the sale/purchase of a small amount of precious metal, which in total add up to a significant amount (smurfing/dispersal of deposits)? If yes, how? _____			

14. TRANSPORTATION

a. How is the recycled gold transported from your company to the refinery?

- By your own company
- By a third party (external company), which company? _____

b. What is the transport method?

- Road
- Boat
- Plane

15. AUTHORISED SIGNATORIES - Please provide ID copies

First Name:	Last Name:	Signature Specimen
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	
First Name:	Last Name:	Signature Specimen
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	
First Name:	Last Name:	Signature Specimen
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	
First Name:	Last Name:	Signature Specimen
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	

Comments / Additional information (please indicate which question the information is referring to):

SIGNATURE

I hereby declare that the information given above is true and accurate as of the date of writing.

I undertake to automatically inform [The refinery] of any material changes.

	Authorised Signatory
Signature and Seal	
Print Name	
Title	
Company Name	
Date and location:	

Attachment 3

A list of the main signs of unusual transactions with gold and precious metals, which may be associated with conflicts or serious offenses in the field of mining, transportation, refining and (or) trade.

1. Unreasonable refusal by the client to provide information (in addition to the established regulatory documents), but requested in accordance with established practice, including about his principal (in the case when the client acts as a representative of a legal entity or individual) or beneficiary, as well as the unnecessary client's concerns about confidentiality issues regarding the transaction being carried out.
2. The presence of non-standard or unusually complex schemes for the procedure for carrying out calculations that differ from normal market practice.
3. The client's proposal to return the amount due under a terminated transaction either to third parties, including to an account in a non-resident bank, or to his own account in a bank other than the bank from which the funds for this transaction were originally received.
4. Introducing additions and changes to the operation (transaction) that do not comply with established practice.
5. Unreasonable haste in carrying out an operation that the client insists on.
6. Introduction by the client to the previously agreed scheme of the operation (transaction) immediately before the start of its implementation of significant changes relating to the direction of movement of funds or precious metals and precious stones, jewelry made from them and scrap of such products.
7. Transfer by the client of an order to carry out a transaction through a representative (intermediary), if the representative (intermediary) carries out the client's order without entering into direct (personal) contact with Kyrgyzaltyn OJSC.
8. Difficulties that arise when verifying the information provided by the client, unjustified delays in the client's provision of documents and information on the operation (transaction), the client's submission of information that cannot be verified or this verification is too expensive.
9. Impossibility of identifying the client's counterparties.
10. Client's insisting on making payments in cash.
11. Use of accounts opened with various credit institutions for settlements within the framework of one agreement.
12. The participant in the transaction with funds or other property is registered in a state or territory that provides a preferential tax regime and (or) does not provide for the disclosure and provision of information when conducting financial transactions (offshore zone) or his account is open in a bank registered in the specified state or territory.
13. Unreasonable demand from the client to terminate the contract and/or return the funds paid by the client before the actual transaction.
14. Carrying out settlements between the parties to a transaction using settlement accounts of third parties, through unofficial banking systems, using cash.
15. Lack of obvious connection between the nature and type of activity of the clients with the services for which the client approaches to the Company.

16. The nature of the transaction is confusing or unusual and has no obvious economic meaning or obvious legal purpose.
17. Inconsistency of the transaction with the goals of the organization's activities established by the constituent documents of this organization.
18. Identification of repeated operations or transactions, the nature of which gives reason to believe that the purpose of their implementation is to evade the mandatory control procedures provided for by the Legislation of the Kyrgyz Republic.
19. Systematic acquisition by an individual of several jewelry or other household products made of precious metals and/or precious stones (products of the same type) and/or certified precious stones.
20. Transfer, on behalf of the client, of funds for sold precious stones, jewelry made from them and scrap of such products to the accounts of third parties.
21. Unmotivated refusal of an organization carrying out transactions with precious metals and precious stones, jewelry made from them and scrap of such products, to provide documents confirming special registration with the federal assay supervision authorities or copies of these documents.
22. When purchasing and selling standard and/or small ingots from refined precious metals, the seller presents copies of documents on quality (passport or certificate) instead of their originals, as well as specifications for them.
23. Deviation of the cost of precious metals, precious stones, jewelry made from them or household products from scrap or other household products from scrap and waste under the contract by more than 20 percent upward or downward from the level of market prices.
24. Sales of products (rods, wire, plates, strips, sheets, etc.) made from standard and/or small bars of refined precious metals without changing the chemical composition.
25. Receipt of a batch(es) of jewelry and/or other household items made of precious metals and precious stones with possibly false seals of assay marks, with unregistered seals of manufacturers' names and/or without seals of state assay marks.

Signs of unusual transactions, the implementation of which may be aimed at financing terrorism.

1. A participant in an operation (transaction), as well as a beneficiary of an operation (transaction), is a person excluded from the List of persons involved in terrorist and extremist activities or the proliferation of weapons of mass destruction (hereinafter referred to as – List). The list is compiled and maintained by the State Financial Intelligence Service under the Government of the Kyrgyz Republic in accordance with Government Resolution No. 135 of March 5, 2010 “On measures to implement the Law of the Kyrgyz Republic “On combating the financing of terrorism and legalization (laundering) of proceeds from crime.”
2. A participant in an operation (transaction), as well as a beneficiary and beneficial owner of an operation (transaction) is a close relative of a person included in the List or excluded from it.

3. The registration address (location or place of residence) of the participant in the operation (transaction), the beneficiary of the operation (transaction) coincides with the registration address (location or place of residence) of the person included in the List or excluded from its.
4. Transactions with funds or other property performed by a person newly included in the next edition of the List before its re-inclusion in the List.
5. The participant in the operation (transaction), as well as the beneficiary and beneficial owner of the operation (transaction) have, respectively, registration, place of residence or location in a country/region/entity with a high degree of risk of terrorist and extremist manifestations, interethnic conflicts, armed clashes and military operations.
6. Making payments for an operation (transaction) using Internet technologies, electronic payment systems, alternative money transfer systems or other remote format systems to (from) a country/region/entity with a high level of risk of terrorist and extremist manifestations, interethnic conflicts, armed clashes and military operations.
7. Operations involving the expenditure of funds by Kyrgyz public organizations and associations (religious organizations, political parties, organizations, associations) and funds that do not correspond to the purposes provided for by their constituent documents.
8. Operations involving the expenditure of funds by Kyrgyzstani branches of representative offices of foreign non-profit non-governmental organizations that do not correspond to the stated goals.
9. Operations for the receipt and expenditure of funds by foreign non-profit non-governmental organizations, public associations, political parties and religious organizations and foundations, as well as their branches and representative offices operating in the territory of the Kyrgyz Republic.
10. Operations involving managers, founders or employees (if such information is available) of public organizations and associations (religious organizations, political parties, organizations, associations), funds, foreign non-profit non-governmental organizations, their branches and representative offices operating in the territory of the Kyrgyz Republic Republic.
11. The declared origin of gold and precious metals is from a country or territory of the Kyrgyz Republic in which there are known reserves or potential undeveloped reserves or the expected volume of production of these metals is small (i.e., the declared volumes of gold and precious metals from this territory exceed its known reserves and (or) potential production volumes);
12. Claimed origin of gold and precious metals obtained from recycled/scrap or mixed sources and processed in a country through which gold and precious metals from conflict or high-risk areas are known or suspected to be transiting.
13. The Supplier and other companies engaged in the mining and processing of gold and precious metals operate in one of the territories associated with risk associated with the origin or transit of gold and precious metals, or have shareholders or other persons from the above-mentioned territories with a financial interest in their activities.
14. Other criteria and characteristics at the discretion of Kyrgyzaltyn OJSC.

Attachment 4

RISK ASSESSMENT (underline as necessary - first, repeated, reassessment of risks)
Name of the counterparty (indicating the period of cooperation with it)

Availability of counterparty's documents
YES
NO

Availability of a completed profile and case file of the counterparty
YES
NO

Availability of a questionnaire with general information about the counterparty
YES
NO

Availability of a certificate about the counterparty
YES
NO

The presence of suspicious transactions on the part of the counterparty during the period of cooperation *
YES
NO

Presence of additional risks that should be taken into account when concluding a contract, for example, geographical factor
YES
NO

*Attachment №1 Identification and assessment of risks in the supply chain

Risk level (underline as appropriate):

LOW, MEDIUM, HIGH.

Prepared by _____

(signature, transcript)

Head of _____

(signature, transcript)

Identification and assessment of risks in the supply chains

Refusal to provide information by the client (other than those established by regulatory legal documents)	YES NO <input type="checkbox"/>
The presence of non-standard or unusually complex schemes on settlement procedures	YES NO <input type="checkbox"/>
The client's proposal to return the amount due under a terminated transaction to third parties	YES NO <input type="checkbox"/>
Unreasonable haste in carrying out an operation that the client insists on	YES NO <input type="checkbox"/>
Introduction by the client of significant changes regarding the direction of movement of funds or precious metals and precious stones, jewelry made from them and scrap of such products	YES NO <input type="checkbox"/>
It is impossible to identify the client's counterparties	YES NO <input type="checkbox"/>
The use of accounts opened with various credit institutions or with third parties for settlements within the framework of one agreement.	YES NO <input type="checkbox"/>
Carrying out cash payments	YES NO <input type="checkbox"/>
Unreasonable demand from the client to terminate the contract and/or return the funds paid by the client before the actual transaction	YES NO <input type="checkbox"/>
Lack of obvious connection between the nature and type of activity of the client with the services for which the client approaches to the Company	YES NO <input type="checkbox"/>
Deviation of the value under the contract by more than 20 percent upward or downward from the level of market prices	YES NO <input type="checkbox"/>

Receipt of a batch(es) with possibly false hallmark seals, or without seals	YES NO <input type="checkbox"/>
The participant in the operation is registered in the territory not providing for the disclosure and provision of information when conducting financial transactions	YES NO <input type="checkbox"/>
A participant in an operation is a person in relation to whom there is information about their involvement in extremist activities or terrorism, or in relation to his/her close relatives	YES NO <input type="checkbox"/>
The participant in the operation (transaction), as well as the beneficiary and beneficial owner of the operation (transaction) have, respectively, registration, place of residence or location in a country/region/entity with a high level of risk of terrorist and extremist manifestations, interethnic conflicts, armed clashes and combat actions.	YES NO <input type="checkbox"/>
Carrying out settlements for an operation (transaction) using Internet technologies, electronic payment systems, alternative money transfer systems or other remote format systems to/from a country/region/entity with a high degree of risk of terrorist and extremist manifestations, interethnic conflicts, armed clashes and combat actions.	YES NO <input type="checkbox"/>
Operations involving the expenditure of funds by Kyrgyz public organizations and associations, Kyrgyz branches and representative offices of foreign non-profit non-governmental organizations that do not correspond to the stated goals.	YES NO <input type="checkbox"/>
The declared origin of gold and precious metals is from a country or territory of the Kyrgyz Republic in which known reserves or potential undeveloped reserves or expected production of these metals are small	YES NO <input type="checkbox"/>

Attachment 5

Acknowledgement form

№	Position	Name	Signature	Date

Attachment 6
Revision Record Sheet

Rev.	Numbers of sheets, pages				Total sheets in document	Document Number	Signature	Date	Document maintenance period
	Revised	Replaced	New	Cancelled					