

LBMA DUE DILIGENCE CHECKLIST

Recyclable Material

No	Check when received	KYC Documents
	<input type="checkbox"/>	“LBMA Questionnaire – Recyclable Material” or any equivalent toolkit document for Refiner consideration <i>Please note that some of the requirements below are already included in the LBMA Questionnaire</i>
	<input type="checkbox"/>	Identify the counterparty - [included in the LBMA Questionnaire, section 1] <ul style="list-style-type: none"> • Name • Address • Country of incorporation
	<input type="checkbox"/>	Evidence of incorporation using reliable independent source documents, data or information, such as: <ul style="list-style-type: none"> • Business register extract • Certificate of Incorporation • Certificate of good standing • Articles of associations • Extract from reliable private database/from regulatory body database
	<input type="checkbox"/>	Identify the beneficial owner(s) – [included in the LBMA Questionnaire, section 3]
	<input type="checkbox"/>	IDs of ultimate beneficial owners
	<input type="checkbox"/>	IDs of authorized signatories
	<input type="checkbox"/>	Screening (through reliable database such as World-Check) on: <ul style="list-style-type: none"> • Counterparty • Ultimate Beneficial owner(s), Other (based on risk classification)
	<input type="checkbox"/>	Gold supply chain policy or adherence to Refiner same
	<input type="checkbox"/>	Corroborative documentation based on the risk classification such as for example: <ul style="list-style-type: none"> • Internet research • Annual report • Group chart • References • Licenses • Certifications • AML policy • Anti-bribery & corruption policy • Google map & street view of given address • Counterparty’s office pictures
	<input type="checkbox"/>	Risk assessment from the Refiner’s perspective
Additional requirements for high risk customers only		
	<input type="checkbox"/>	Report visit on on-site visit conducted within 6 months of the business relationship commencing, at the latest
	<input type="checkbox"/>	Screening on all companies located in conflict related areas in the chain from the gold/silver supplying counterparties to the refinery
	<input type="checkbox"/>	For refinery with red flag in the supply chain, audit report in compliance with OECD If no audit performed, implement risk mitigation strategy
	<input type="checkbox"/>	If non LBMA Good Delivery refinery is not identified, implement risk mitigation strategy