

## Disclosure Guidance Consultation Response

**Date:** Consultation closed 19 September 2025

**Respondent:** Anonymous

**Organisation's Role in Gold Supply Chain:** Refiner

Spelling of Annex on page 4 (Anex)

Spelling of Gold on page 4 (fold)

Just to clarify – page 11 – clause 3 – “originates from or has been transported through a CAHRA” – aircraft originating from non-CAHRA and flying over a CAHRA (but not landing or entering) and then arriving at a non-CAHRA does not count. E.g. gold flying from London to XX destination on a commercial airliner (e.g. XYZ Airways) flies through a CAHRA country’s airspace. This country is a CAHRA but the material did not land / enter this country therefore it was not “transported through a CAHRA” it merely transited through this country’s airspace with chain of custody etc in tact.

Can we ask where the below from page 11 is from – this is not in RGGv9. Should we put it in RGGv10 first and then it can feature in the disclosure guidance?

- o European Commission Delegated Regulation (EU) 2024/163 third countries which have strategic deficiencies in their AML/CFT regimes

RGGv9

### Location risk identification should include, but is not limited to:

This location-based risk identification process must include an integrated assessment of all risks outlined in Step 1.1.

Sources of such an integrated assessment must include, but are not limited to:

- Sanctions lists (US, UK, EU, UN, and relevant sanctions lists)
- Dodd Frank s. 1502
- EU CAHRA list
- Heidelberg Barometer
- Fragile States Index or equivalent
- UN Human Rights Office of the High Commissioner or equivalent
- Reports (including relevant country reports) by the Financial Action Task Force (FATF)
- Credible market intelligence on high-risk gold centres/transit hubs and on countries where there is a high risk of money laundering.

Refiners should also consider credible market intelligence to cover the risk factors included in Step 1.1, as relevant.