

LBMA DUE DILIGENCE CHECKLIST

Mined Material

KYC Documents	
<input type="checkbox"/>	<p>“LBMA KYC Questionnaire – Mined Material” or any equivalent toolkit document used for Refiner consideration <i>Please note that some of the requirements below are already included in the LBMA Questionnaire</i></p>
<input type="checkbox"/>	<p>Identify the counterparty - [included in the LBMA Questionnaire, section 1]</p> <ul style="list-style-type: none"> • Name • Address • Country of incorporation
<input type="checkbox"/>	<p>Evidence of incorporation using reliable independent source documents, data or information, such as:</p> <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"/>	ID of ultimate beneficial owners
<input type="checkbox"/>	ID of authorized signatories
<input type="checkbox"/>	<p>Screening (through reliable database such as World-Check) on:</p> <ul style="list-style-type: none"> • Counterparty • Ultimate Beneficial owner(s), Other (based on risk classification)
<input type="checkbox"/>	Copy of mining license(s)
<input type="checkbox"/>	Copy of export license(s) if applicable
<input type="checkbox"/>	<p>Corroborative documentation based on the risk classification such as for example:</p> <ul style="list-style-type: none"> • Internet research • Annual report • Corporate social responsibility report • Group chart • References • Licenses • Certifications • Environmental Impact Assessment • Counterparty’s policies and procedures, if applicable and relevant: <ul style="list-style-type: none"> ○ AML ○ Anti-bribery and corruption (incl. payment to government) ○ Human rights ○ Environmental ○ Health & Safety ○ Labour ○ Community engagement ○ Code of conduct ○ Grievance / Whistleblowing • Mining site and processing plant pictures
<input type="checkbox"/>	Does the company have an environmental incident plan (incl. tailings dam failure)?



	<input type="checkbox"/>	Identify if the transportation route from the mine to the refinery transit is through a Conflict-Affected area?
	<input type="checkbox"/>	Risk assessment from the Refiner's perspective

Additional requirements for high risk supply chain		
	<input type="checkbox"/>	Report visit on on-site visit conducted within 6 months of the business relationship commencing, at the latest - [LBMA on site visit form may be used]
	<input type="checkbox"/>	Screening on all companies located in conflict related areas, in the supply chain from the mine to the refinery
	<input type="checkbox"/>	Self-declaration of taxes and royalties' compliance, as applicable