

## LBMA DUE DILIGENCE CHECKLIST

### Recyclable Material

No	Check when received	KYC Documents
	<input type="checkbox"/>	<p>“LBMA Questionnaire – Recyclable Material” or any equivalent toolkit document for Refiner consideration</p> <p><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"> <li>• Name</li> <li>• Address</li> <li>• Country of incorporation</li> </ul>
	<input type="checkbox"/>	<p>Evidence of incorporation using reliable independent source documents, data or information, such as:</p> <ul style="list-style-type: none"> <li>• Business register extract</li> <li>• Certificate of Incorporation</li> <li>• Certificate of good standing</li> <li>• Articles of associations</li> <li>• Extract from reliable private database/from regulatory body database</li> </ul>
	<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"/>	<p>Screening (through reliable database such as World-Check) on:</p> <ul style="list-style-type: none"> <li>• Counterparty</li> <li>• Ultimate Beneficial owner(s), Other (based on risk classification)</li> </ul>
	<input type="checkbox"/>	Gold and/or silver supply chain policy or adherence to Refiner same
	<input type="checkbox"/>	<p>Corroborative documentation based on the risk classification such as for example:</p> <ul style="list-style-type: none"> <li>• Internet research</li> <li>• Annual report</li> <li>• Group chart</li> <li>• References</li> <li>• Licenses</li> <li>• Certifications</li> <li>• AML policy</li> <li>• Anti-bribery &amp; corruption policy</li> <li>• Google map &amp; street view of given address</li> <li>• Counterparty’s office pictures</li> </ul>
	<input type="checkbox"/>	Risk assessment from the Refiner’s perspective
		<b>Additional requirements for high risk customers only</b>
	<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 and/or 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