

FREQUENTLY ASKED QUESTIONS

Assurance Providers' Toolkit

1) Are Assurance Providers required to use the AAP toolkit/LBMA templates?

Yes. LBMA templates are mandatory for all Assurance Providers and for each Responsible Sourcing Programme (RSP) Assurance Engagement.

LBMA recognises the technical input required on Assurance Templates and therefore is open to exempting AAPs from using the Assurance Report Templates included in the AAP Toolkit. A formal exemption application must be made of equivalent templates for LBMA review and confirmation in writing prior to final submissions. Please note the equivalent templates must be aligned to all the requirements outlined in the Third Party Assurance Guidance version 2 (TPAG2), section 3.3 Assurance Providers' Conclusion and Reporting. These must also contain the "procedures" outlined in the LBMA templates as a minimum.

2) Will the mandatory Quality Control Templates (QCTs) apply retrospectively for 2025?

No. The Toolkit applies to assurance engagements starting on 1 January 2026. AAPs may voluntarily apply the AAP Toolkit to engagements starting prior to this date.

3) What is the deadline for submission?

- **Four weeks prior** to the site visit: QCT Form 1: Pre-assurance briefing form to be emailed to responsible.sourcing@lbma.org.uk
- **Two weeks prior**: a pre briefing call will be held with LBMA for planning purposes.
- **At the end of the engagement**: all three finalised QCT forms should be submitted with the Assurance Reports.

4) Does a separate assurance report need to be submitted for Country of Origin Annex?

Yes. As the scope of COO assurance is limited this may differ to a reasonable assurance scope for Compliance Reports and it is not always clear what procedures have been undertaken on the COO data, for clarity LBMA requests two separate assurance reports.

5) Do all deliverables need to be submitted to LBMA by email or via GBI platform?

All deliverables must be submitted via the GBI Platform. The only exception is during the pre-assurance planning stage: the QCT 1.1 Pre-Assurance Briefing document should initially be submitted by email to the RS Team. However, the final fully completed version must be uploaded to the GBI Platform along with all other deliverables.

6) Is the new AAP Toolkit expected to be documented as part of an Assurance Provider's planning procedures, and will the documentation within the Toolkit need to be reported to LBMA as part of the annual compliance process?

Yes. LBMA expects AAPs to submit the Excel-based pre-assurance briefing form included in the Toolkit instead of the previous Word-based template. All three QCT Forms must be finalised and submitted with assurance deliverables, including Assurance Reports, via GBI

7) For the Planning procedure, what level of detail is expected beyond a simple Yes/No response?

LBMA does not require KYC forms or transaction records at this stage. The objective is to identify initial risks in advance of the site visit.

- 'Yes' or 'No' answers are sufficient;
- Any clarifying remarks can be added in Column D of the spreadsheet;
- Key risks identified should also be summarised in the 'Key Risks Identified' table. This should provide an overview rather than a full risk assessment.

8) What if a supplier only permits review of transactions or samples during the onsite visit due to confidentiality?

LBMA recognises this may occur. Where data cannot be shared in advance, the pre-assurance briefing form should still be completed as fully as possible and submitted at the end of the engagement, together with the other required forms.

9) On the sample selection tab re: type of material what category would investment gold fit into?
[QCT 1.1, Sample Selection tab]

Per Responsible Gold Guidance 9, investment gold should be categorised as Unprocessed recycled gold. If there are any anomalies do ask the RS team.

10) Will there be any guidance issued on sample selection?

Overarching guidance on sample selection methodology is included in the current LBMA TPAG2.

LBMA requests information on AAP sample selection methodology in the QCT Forms to assess how best to improve guidance on this in TPAG 3.

11) When does an issue become a true non-conformance' in the context of LBMA feedback?

This depends on the refiner's circumstances and the context of the findings. AAPs are expected to use the criteria provided in TPAG 2 Appendix Non-Conformance Risk Levels as well as judgement based on severity versus likelihood of occurrence. LBMA's Sustainability and Responsible Sourcing Report lists common examples of high-risk non-conformances to assist Assurance Providers in making consistent determinations.

12) Emphasis of matter: Does it require AAPs to record all types of risks in the new AAP toolkit as they would have done in the non-conformance report template?

Only High-Risk non-conformance must be clearly indicated in the emphasis of matter section of the Annual Report.

13) What is the expectation for the conclusion?

[refers to QCT 1.1, Engagement Scope tab, Conclusion]

To ensure consistency, one of five standardised conclusions must be selected [unmodified; unmodified with emphasis on the matter; modified, limitation of scope; modified, disagreement; modified, material and pervasive misstatement]. These align with ISAE 3000 and TPAC (Third-Party Assurance Committee) terminology. AAPs may edit the language to align with their own internal guidelines, however LBMA RS Team must be notified in advance of final submission or through a formal exemption for the mandatory use of the Assurance Report templates.

14) Can the AAP toolkit be shared with Refiners?

Yes. AAPs can share the AAP Toolkit with Refiners if they choose to. It is expected Refiners will see the Assurance Reports in advance, however the QCT Forms may also be shared.

15) Can the completed QCT Forms be shared with the Refiner for confirmation? If so, is there a need for the AAP to submit an additional management report to Refiners?

LBMA Mandatory reporting is the submission of the completed AAP Toolkit. Assurance Providers can determine with the refiner if they voluntarily want to submit the Management Report. AAPs should ensure they comply with the independence requirements of the ISAE3000 revised assurance standard when sharing the QCT Forms with Refiners for confirmation.

**16) Is LBMA expected to use ISSA 5000 starting in 2027 or continue using ISAE 3000?
[Territories are expected to implement on audits of fiscal years starting Dec 15, 2026]**

LBMA will continue to apply ISAE 3000 revised for the upcoming assurance cycle. Once the Responsible Gold Guidance v10 is drafted, LBMA will revise Third-Party Assurance Guidance version 3 (TPAG3) to incorporate ISSA 5000.

Note: The FAQ will be updated periodically as further questions arise during implementation. Please direct additional queries to responsible.sourcing@lbma.org.uk