

LBMA RESPONSIBLE SOURCING PROGRAMME

Application Form: Exemption for public reporting in relation to specific material sources under Disclosure Guidance version 3

About this application form

As part of the Responsible Sourcing Programme, LBMA requires all Good Delivery List (GDL) Refiners to meet the disclosure requirements set out in the Disclosure Guidance (DG3). This includes the 'Refiner Transparency Roadmap – 2026 Disclosure Requirements' for GDL Refiners on the Current Gold List, applying Responsible Gold Guidance version 9 (RGG9).

LBMA recognises multi-metal procurement can differ from that of single-metal gold and that this can create distinct commercial sensitivities for multi-metal refiners. To balance operational factors with the LBMA's transparency objectives, LBMA has introduced a limited exemption for multi-metal Refiners on the Current Gold List from the Refiner Transparency Roadmap – 2026 Disclosure Requirements.

In order to do so, Refiners must complete the following application and meet the criteria set out below.

Exemption Criteria

Multi metal refiners on the Current Gold List may apply for an exemption for public disclosure of the identity of the refiner and local exporter in OECD red flag locations for the sourcing of:

- Industrial by-products, typically multi-metallic materials consisting of gold together with base metals, or gold together with other precious metals and other elements and impurities.
- Low grade unprocessed recyclables or low grade melted recyclables, typically with a gold content of 2% or below and where gold is not the main or only recoverable metal.
- For Mining By-products, per the definition of origin of mining by-product in the OECD DD Guidance and RGGv9, the location to determine red flag risks will be at the point of separation of the precious metal. Mining By-products with a gold content of 2% or below may also lead to an exemption of disclosing requirements.

These include the following non-exhaustive list of materials:

- Slags (from primary processes, precious metals, base metals slags)
- Blisters, anodes, anode slimes
- Sludges (with copper, lead, leaching residues, neutralization residues)
- Flue dust
- Refractories
- Floor Sweepings
- Dross
- Mattes
- e-Scrap (printed circuit boards, components, sweeps or metallics from mechanically prepared e-scrap)
- Incineration bottom ashes
- Spent catalysts
- Carbon spent/activated carbon

Refiners may apply for exemption of other industrial by-product and low gold content recyclable materials not listed above.

Specific, unambiguous reasons for significant commercial sensitivities must be provided.

Application Process

An exemption application must be submitted for all relevant material, including for the material types already stated in this application form.

Refiners must complete this application form and return it, together with any required supporting material, to responsible.sourcing@lbma.org.uk, at least 3 months prior to the start of the annual third-party assurance engagement, or as soon as practically feasible.

A decision on the application will be made by the LBMA Good Delivery Department, who may request additional information in order to progress the application.

Where the exemption request is approved, the Refiner will be required to publicly disclose in the Refiner's Compliance Report.

- *The number* of refiners and local exporters in red-flag locations by continent.
- Statements that the information on the identities and high-risk location of suppliers of the exempted material:
 - has been disclosed privately to the LBMA.
 - may be shared with interested parties on a bilateral basis, subject to the interested party meeting the eligibility criteria specified in the application form.
 - has been subject to the risk based third-party assurance, as has the exemption.

Section 1 – GDL Refiner Information

| GDL Refiner Details | | |
|---|------------------|--|
| Name of GDL Refiner | | |
| GDL Status | Gold | |
| | Gold and Silver | |
| Reporting year | | |
| Primary Contact Person | Name | |
| | Position | |
| | Telephone Number | |
| | E-mail Address | |
| Exemption Request | | |
| Material Type Please set out the type of material that you believe should be exempt and whether it is classified as industrial by-product or low content recyclable waste. | | |
| Gold content What is the estimated gold content for this material (percentage %)? | | |
| Processing Method and Point of separation Briefly describe: - the process from which the gold-bearing material is generated - the processing method to extract gold bearing material - the location where the separation takes place | | |
| Commercial sensitivities Please explain why you consider the public disclosure of the information required in DG3 to be of significant commercial sensitivity. | | |
| Please provide any additional details as relevant | | |

GDL Refiner Commitments

Please confirm that upon exemption request approval you will publicly disclose in the Refiner's Compliance Report.

- i) *The number* of refiners and local exporters in red-flag locations by continent.
- ii) Statements that the information on the identities and high-risk location of suppliers of the exempted material:
 - has been disclosed privately to the LBMA.
 - may be shared with interested parties on a bilateral basis, subject to the interested party meeting the eligibility criteria specified in the application form.
 - has been subject to the risk based third-party assurance, as has the exemption.

Authorised Person: _____

Position: _____

Signature: _____

Date: _____

Section 2 – Eligibility Criteria

Where the Responsible Sourcing Compliance Panel approves an exemption request, interested parties may contact the Refiner, on a bilateral basis, to request the disclosure information. This will be subject to the interested party meeting the eligibility criteria as set out below.

The party requesting the information:

1. Is a legally registered entity in the country where headquartered and can demonstrate the request is being made as part of public interest reporting.
2. Must not be involved in the gold supply chain e.g. peers, upstream, and downstream companies.
3. Be willing to sign a non-disclosure agreement provided by the refiner to be respected by its organization.
4. Outline the intended ways, or publications, in which the information will be used.

In addition to the above it is recommended that the party requesting the information is willing to visit the works of the refinery in question or is able to visit its office to review the information there.