

LBMA DUE DILIGENCE CHECKLIST

Mined Material

No	Check when received	KYC Documents
	<input type="checkbox"/>	“LBMA Questionnaire – Mined Material” or any equivalent assessment document <i>Please note that some of the requirements below are already included in the LBMA Questionnaire</i>
	<input type="checkbox"/>	Identify the counterparty - [included in the LBMA Questionnaire, section 1] <ul style="list-style-type: none"> • Name • Address • Country of incorporation
	<input type="checkbox"/>	Evidence of incorporation using reliable independent source documents, data or information, such as: <ul style="list-style-type: none"> • Business register extract • Certificate of Incorporation • Certificate of good standing • Article 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"/>	Screening (through reliable database such as Worldcheck) on: <ul style="list-style-type: none"> • Counterparty • Beneficial owner(s) • Others (based on risk assessment)
	<input type="checkbox"/>	Financial details – [included in the LBMA Questionnaire, section 5]
	<input type="checkbox"/>	Documentation supporting the purpose of the business relationship - [included in the LBMA Questionnaire, section 10]
	<input type="checkbox"/>	Documentation supporting business details / Customer profile – [included in the LBMA Questionnaire]
	<input type="checkbox"/>	Identifying gold origin - [included in the LBMA Questionnaire, section 8]
	<input type="checkbox"/>	Copy of mining license(s) for mining operations located in conflict affected or human right abuse high risk areas - [requested in LBMA Questionnaire, section 8]
	<input type="checkbox"/>	Copy of export license(s) for gold supplying counterparty located in conflict affected or human right abuse high risk areas - [requested in LBMA Questionnaire, section 9]
	<input type="checkbox"/>	Collecting and assessing mining practice – [included in the LBMA Questionnaire, section 6 & 8 & 9]
	<input type="checkbox"/>	Collecting mining capacity, if available - [included in the LBMA Questionnaire, section 8 & 9]
	<input type="checkbox"/>	Corroborative documentation based on the risk assessment such as for example: <ul style="list-style-type: none"> • Authorized signatories’ IDs • Beneficial owners’ IDs • Internet research • Annual report • Corporate social responsibility report • Group chart • References • Licenses • Certifications • Counterparty’s policies and procedures (Code of conduct, CSR policy, health and safety procedures, bribery policy, etc.) • Google map of given address • Mining site and processing plant pictures • Regulatory environment assessment • Etc.
	<input type="checkbox"/>	Risk assessment from the Refiner’s perspective <i>Note that the LBMA Supply Chain Assessment Form can be used</i>

Additional requirements for high risk supply chain		
	<input type="checkbox"/>	Report visit on on-site visit – [LBMA on site visit form may be used]
	<input type="checkbox"/>	Screening on all companies located in conflict related areas in the chain from the mine to the refinery