

## LBMA Questionnaire – Mined Material

1. COMPANY DETAILS	
<b>a. Name</b>	
<b>b. Registered Address</b>	
<b>c. Business Address</b>	
<b>d. Phone Number</b>	
<b>e. Date of Incorporation</b>	
<b>f. Country of Incorporation</b>	
<b>g. Business Registration Number</b>	
<b>h. Tax Identification/Registration Number</b>	
<b>i. If listed, indicate name of stock exchange(s) and ticker</b>	
<b>j. Website</b>	
<b>k. External Financial Auditors Since Date</b>	
<b>l. How many direct and indirect subsidiaries does the company have?</b> <i>Please provide a Group chart</i>	

2. BUSINESS ACTIVITY	
<b>a. Type Of Business</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p>Large scale mine (&gt;100'000 oz/year)</p> <p>Medium scale mine (30-100'000 oz/year)</p> <p>Small scale mine (&lt;30'000 oz/year)</p> </div> <div style="width: 35%;"> <p><input type="checkbox"/> Precious Metals trader <input type="checkbox"/></p> <p><input type="checkbox"/> Others, please specify: <input type="checkbox"/></p> <p><input type="checkbox"/> _____</p> </div> </div>
<b>b. Description of Core Business Activity</b>	
<b>c. In which country/ies do you currently refine your precious metals?</b>	

3. BENEFICIAL OWNERS				
SHAREHOLDER(S) (MORE THAN 25%)				
Percentage Holding (%)	Name	Address	Country of Incorporation/ Nationality(ies)	Date of Incorporation/ Date of Birth
ULTIMATE BENEFICIAL OWNER (MORE THAN 25% - INDIVIDUAL ONLY)				
Percentage Holding (%)	Name	Address	Nationality(ies)	Date of Birth

4. MANAGEMENT STRUCTURE				
	Names	Title	Nationality(ies)	Date of Birth
<b>a. Board of Directors</b>				
<b>b. Top Management</b>				

5. FINANCIAL INFORMATION			
5.1 Financial statements details			
	Currency	Last Reporting Period	Previous Year
<b>a. Share Capital</b>			
<b>b. Total Shareholder's Equity</b>			
<b>c. Total Balance Sheet</b>			
<b>d. Sales</b>			
<b>e. Net Income</b>			
<i>Please provide copy of latest annual report</i>			

5.2 Other Financial Information									
<b>f. Source of mining operation funding</b>	<input type="checkbox"/> Own equity <input type="checkbox"/> Government entity, name(s): _____ <input type="checkbox"/> Bank loan, name(s): _____ <input type="checkbox"/> Other third party loan, name(s): _____								
<b>g. What usual payment method does the Company use to pay its suppliers?</b>	<table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="width: 60%;">Payment type</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Bank transfers</td> <td></td> </tr> <tr> <td>Checks</td> <td></td> </tr> <tr> <td>Cash</td> <td></td> </tr> </tbody> </table>	Payment type	Percentage (%)	Bank transfers		Checks		Cash	
Payment type	Percentage (%)								
Bank transfers									
Checks									
Cash									

6. REGULATORY ENVIRONMENT	YES	NO	N/A
<b>a. Does your Company need to comply with detailed health and safety regulations in the country/province of operations?</b>			
<b>b. Does your Company need to comply with detailed environmental regulations in the country/province of operations?</b>			
<b>c. Is child labour regulated in mining activity in the country/province of operations?</b>			
<b>d. Are public security forces used on or around the mine site?</b>			

7. HUMAN RESOURCES	
<b>a. Number of employees within the Company</b>	
<b>b. Number of employees within the Group</b>	

8. ORIGIN OF PHYSICAL PRECIOUS METALS, CAPACITY AND MINING PRACTICES	
a. From how many mining site(s) is the gold/silver extracted?	
b. Name of the mining site(s):	
c. Where exactly is the mining site(s) located (country, province, closest city, GPS coordinate)?	
d. In which perimeter (km) around the centre of operation/processing plant is the mining site(s) located?	
e. Is the mining site(s) legally required to hold a mining license? <i>Please provide a copy/ies</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No Date of issue: _____ Expiry date: _____
f. What is the daily production of the mining site(s)?	
g. What are the estimated reserves of the mining sites(s)?	
h. How many people are working on the mining site(s)?	
i. What is the gold extraction method (mining equipment & methods)?	
j. Are there comprehensive procedures and systems to guarantee the safety of personnel at the mining site (such as use of proper protective equipment, health and safety training, first aid materials and emergency procedures)?	<input type="checkbox"/> Yes, please describe:  <input type="checkbox"/> No
k. Are there comprehensive procedures and systems at the mining site to avoid negative impact to the environment by gold extraction (such as adequate tailing treatment, system to avoid pollution emission, etc)?	<input type="checkbox"/> Yes, please describe:  <input type="checkbox"/> No
l. Does the mining site engage with affected communities and support local community development?	<input type="checkbox"/> Yes, please describe:  <input type="checkbox"/> No

<p><b>m. Is there a comprehensive procedure at the mining site to ensure prevention of child labour?</b></p>	<p><input type="checkbox"/> Yes, please describe:</p>  <p><input type="checkbox"/> No</p>
<p><b>n. Are there any armed groups stationed on/near the mine site?</b>  <b>If yes, please provide information as to the reason:</b></p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> State Armed group</p> <p><input type="checkbox"/> Non State Armed Group</p> <p><input type="checkbox"/> Public or private security forces</p> <p>-----</p> <p>-----</p> <p><input type="checkbox"/> No</p>
<p><b>o. Does the Mining Company employ professional security forces to control the mine site?</b></p>	<p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p>
<p><b>p. Has the Regulator responsible for mining operations carried out an on-site visit</b></p>	<p><input type="checkbox"/> Yes, date of last visit: _____</p> <p><input type="checkbox"/> No</p>
<p><b>q. If no on-site visit has been performed yet (question p above), is there any visit planned?</b></p>	<p><input type="checkbox"/> Yes, date of planned visit: _____</p> <p><input type="checkbox"/> No</p>

9. PROCESSING PLANT	
<b>a. Where exactly is the gold/silver processing plant(s) located (country, province, closest city, GPS coordinate)?</b>	
<b>b. How many people are working in the gold/silver processing plant?</b>	
<b>c. Is the gold/silver processing plant held by the mining company or is it outsourced to an external party?</b>	<input type="checkbox"/> Mining company processing plant <input type="checkbox"/> Gold/silver processing outsourced to an external plant  Name: _____
<b>d. If the Mining Company has its own processing plant, does it also source mined gold/silver for processing from external parties?</b>	<input type="checkbox"/> Yes Name and location of mining sites: _____  <input type="checkbox"/> No
<b>e. What is the gold/silver processing method (processing equipment &amp; methods)?</b>	
<b>f. What chemical products are used during processing?</b>	<input type="checkbox"/> Mercury <input type="checkbox"/> Cyanide <input type="checkbox"/> Others, please specify: _____
<b>g. What is the capacity of the processing plant per day?</b>	
<b>h. Is your Company legally required to have a license to export precious metals?</b>	<input type="checkbox"/> Yes – Please provide a copy Date of issue: _____ Expiry date: _____  <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>i. Are there any comprehensive procedures and system to guarantee the safety of personnel in the processing plant (such as use of proper protective equipment, health and safety training, first aid materials and emergency procedures)?</b>	<input type="checkbox"/> Yes, please describe:    <input type="checkbox"/> No
<b>j. Does the processing plant have comprehensive processes to avoid negative impact to the environment by gold/silver processing (such as adequate tailing treatment, system to avoid pollution emission, etc)?</b>	<input type="checkbox"/> Yes, please describe:    <input type="checkbox"/> No

<b>k. Does the processing plant engage with affected communities and support local community development?</b>	<input type="checkbox"/> Yes, please describe  <input type="checkbox"/> No
<b>l. Does the processing plant have a comprehensive procedure to ensure prevention of child labour?</b>	<input type="checkbox"/> Yes, please describe  <input type="checkbox"/> No
<b>m. Is there any armed groups stationed on/near the processing plant?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> State Armed group <input type="checkbox"/> Non State Armed Group <input type="checkbox"/> Public or private security forces  <input type="checkbox"/> No
<b>n. Does the processing plant employ professional security forces to control the plant</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No

**MATERIALS**

<b>a. What type of precious metals is the Company planning to send for refining?</b> <input type="checkbox"/> Gold <input type="checkbox"/> Silver <input type="checkbox"/> Others, please specify: _____
<b>b. What is the form of precious metals planned to be sent for refining?</b> <input type="checkbox"/> Gold concentrate <input type="checkbox"/> Silver concentrate <input type="checkbox"/> Gold ore <input type="checkbox"/> Silver ore <input type="checkbox"/> Mining by-product <input type="checkbox"/> Others, please specify: _____

**Transportation**

**a. How is the ore transported from the mining sites to the processing plant?**

- By your company
- By a third party (external company), which company? \_\_\_\_\_

**b. How is the ore transported from the processing plant to the export location?**

- By your company**
  - Truck     Helicopter     Armoured vehicle     Fixed wing aircraft
  - Others, please specify \_\_\_\_\_
- By a third party (external company), which company?** \_\_\_\_\_
  - Truck     Helicopter     Armoured vehicle     Fixed wing aircraft
  - Others, please specify \_\_\_\_\_

**c. How will the ore be transported from the export location to the refinery?**

- By your company**
  - Aircraft     Boat     Armoured vehicle     Others, please specify: \_\_\_\_\_
- By a third party (external company), which company?** \_\_\_\_\_
  - Aircraft     Boat     Armoured vehicle     Others, please specify: \_\_\_\_\_

**d. Is there any military/police checkpoint along the road from the mining site until the export location?**

- Yes  
If yes, how many and for what purpose?  
\_\_\_\_\_  
\_\_\_\_\_
- No



10. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY	
<p><b>a. Did your company establish a responsible supply chain of gold from conflict-affected and high risk areas policy which is consistent with the standards set forth in the model supply chain policy in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas? <a href="http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf">http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf</a></b></p>	<p><input type="checkbox"/> Yes – Please provide a copy</p> <p><input type="checkbox"/> No</p>
<p><b>b. Does your company comply or plan to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?</b></p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p><b>c. Does your company comply with any of the following industry initiatives:</b></p> <p><input type="checkbox"/> RJC Chain of Custody Standard</p> <p><input type="checkbox"/> RJC Code of Practices</p> <p><input type="checkbox"/> WGC Conflict Free Gold Standard</p> <p><input type="checkbox"/> Fair Trade Standard</p> <p><input type="checkbox"/> Fair Mined Standard</p> <p><input type="checkbox"/> Others, please specify: _____</p> <p><i>Please provide a copy of the certification</i></p>	<p>Additional comments:</p>
<p><b>d. What are the procedures in place to ensure that the precious metals purchased have not financed conflict?</b></p>	

11. ANTI MONEY LANDINGING (AML) – COMBATING FINANCIAL TERRORISM (CFT)	
a. Is your company subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation?	<input type="checkbox"/> Yes – Please fill in the Wolfsberg questionnaire attached <input type="checkbox"/> No
b. Name of the AML-CFT Law/Regulation	
c. Name of the Regulator	
d. Did your company establish a conformity program that contains AML/CFT policies and procedures, according to internal & international laws, rules and standards?	<input type="checkbox"/> Yes – Please provide a copy <input type="checkbox"/> No

12. BRIBERY POLICY	
a. Does your Company have a bribery policy in place?	<input type="checkbox"/> Yes – Please provide a copy <input type="checkbox"/> No
b. Has the company or the Senior Management ever been charged anywhere in the World for violation of applicable anti-bribery laws or regulations?	<input type="checkbox"/> Yes – Please provide details <input type="checkbox"/> No

## SIGNATURE

I/we hereby declare that the information given above is true and accurate as of the date of writing.

I/we undertake to automatically and promptly inform [*The refinery*] of any material changes.

	Authorised signatory	Authorised signatory
Signature:		
Print Name:		
Title:		
Company Name		
Date and Location:		

## ATTACHMENT – TO BE FILLED IN ONLY FOR COMPANY SUBJECT TO AML-CFT REGULATION

Wolfsberg Anti-Money Laundering Questionnaire		
<b>Corporate Name:</b>		
<b>Location:</b>		
<b>If you answer “no” to any question, please ensure that an explanation and additional information is supplied at the end of the relevant section</b>		
I. <i>General AML Policies, Practices and Procedures:</i>	Yes	No
1. Is the AML compliance program approved by the Corporate’s board or a senior committee?		
2. Does the Corporate have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML framework?		
3. Has the Corporate developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?		
4. In addition to inspections by the government supervisors/regulators, does the corporate client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?		
5. Does the Corporate have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group).		
6. Does the Corporate have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?		
7. Does the Corporate have policies covering relationships with politically exposed persons (PEP’s), their family and close associates?		
8. Does the Corporate have record retention procedures that comply with applicable law?		
9. Does the Corporate require that its AML policies and practices be applied to all branches and subsidiaries of the corporate both in the home country and in locations outside of the home country?		

<b>II. Risk Assessment</b>	<b>Yes</b>	<b>No</b>
10. Does the Corporate have a risk-based assessment of its customer base and their transactions?		
11. Does the Corporate determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the Corporate has reason to believe pose a heightened risk of illicit activities at or through the Corporate?		
<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence</b>	<b>Yes</b>	<b>No</b>
12. Has the Corporate implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?		
13. Does the Corporate have a requirement to collect information regarding its customers' business activities?		
14. Does the Corporate assess its FI customers' AML policies or practices?		
15. Does the Corporate have a process to review and, where appropriate, update customer information relating to high risk client information?		
16. Does the Corporate have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information?		
17. Does the Corporate complete a risk-based assessment to understand the normal and expected transactions of its customers?		
<b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>	<b>Yes</b>	<b>No</b>
18. Does the Corporate have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?		
19. Where cash transaction reporting is mandatory, does the Corporate have procedures to identify transactions structured to avoid such obligations?		
20. Does the corporate screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?		
21. Does the Corporate have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?		
<b>V. Transaction Monitoring</b>	<b>Yes</b>	<b>No</b>
22. Does the Corporate have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travellers checks, money orders, etc.		

VI. AML Training	Yes	No
23. Does the Corporate provide AML training to relevant employees that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the Corporation's products and services and internal policies to prevent money laundering?		
24. Does the Corporate retain records of its training sessions including attendance records and relevant training materials used?		
25. Does the Corporate communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?		
26. Does the Corporate employ third parties to carry out some of the functions of the Corporate?		
27. If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> <li>• Identification and reporting of transactions that must be reported to government authorities;</li> <li>• Examples of different forms of money laundering involving the Corporate's products and services</li> <li>• Internal policies to prevent money laundering</li> </ul>		

Space for additional information (Please indicate which question the information is referring to):

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