JOINT STOK COMPANY

“URALS’ INNOVATIVE TECHNOLOGIES”

(JSC “UIT”)

|  |  |  |  |
| --- | --- | --- | --- |
|

|  |
| --- |
| dated12 of January 2021 |
|  |
|  |

 |
|  |
|  |

|  |
| --- |
| **PLATINUM AND PALLADIUM RESPONSIBLE SOURCING POLICY** |

**TABLE OF CONTENTS**

|  |  |  |
| --- | --- | --- |
| 1 | Purpose................................................................................................................ | 3 |
| 2 | Scope……………………………………………………………………………………. | 3 |
| 3 | Regulatory References………………………………………………………………… | 3 |
| 4 | Responsibilities..................................................................................................... | 3 |
| 5 | Terms, Definitions and Abbreviations...................................................................  | 4 |
| 6 | Supply Chain Management Philosophy and Arrangement.................................. | 4 |
| 7 | Risk Identification and Assessment…………………………………………………. | 8 |
| 8 | Development and Implementation of Risk Management Measures..................... | 9 |
| 9 | Transaction Monitoring......................................................................................... | 10 |
| 10 | Staff Training........................................................................................................ | 11 |
| 11 | Audit..................................................................................................................... | 11 |
| 12 | Annual Reports..................................................................................................... | 13 |
| Annex A. Questionnaire – Mined Material ………………………..………………………. | 14 |
| Annex Б. Questionnaire – Recycled Material………..……………………………………. | 24 |
| Annex В. Self-Assessment Questionnaire……………………………..…………………. | 30 |
| Annex Г. Site Visit Form – Mined Material…………………………….………………….. | 44 |
| Annex Д. Site Visit Form – Recycled Material…….………….…………………………… | 51 |
| Annex Е. Risk Assessment Table…….………….…………………………………………. | 56 |

**1 PURPOSE**

1.1 This Platinum and Palladium Responsible Sourcing Policy (hereinafter referred to as the "Policy") describes the current platinum and palladium supply chain management in Ural Innovative Technologies, JSC.

**2 SCOPE**

2.1 This Policy is designed to ensure the responsible selection and assessment of reliable suppliers, identify and manage risks in relation to their activities in order to ensure that they play a certain role in preventing and reducing actual and potential adverse impacts and consequences associated with the issues identified in the OECD Best Practices, including the issues of preventing systematic or large-scale human rights violations, preventing facilitation of conflicts, adhering to high anti-money laundering and counter-terrorism financing standards, etc.

2.2 The Policy contains the following information:

- structure and philosophy of supply chain management;

- description of the supplier identification procedures;

- description of the risk assessment procedure;

- description of the risk mitigation procedure;

- description of the transaction monitoring procedure;

- description of the staff training process;

- annual reporting procedure concerning the Policy performance;

- auditing procedure.

2.3 The Policy requirements shall apply to the activities of all the Company's employees regardless of their position within the scope of their functions.

**3 REGULATORY REFERENCES**

Instruction approved by Order of the Ministry of Finance of the Russian Federation No. 231н dated 9/12/2016 Concerning the Procedure of Accounting and Storage of Precious Metals, Gemstones, Products Made of Them and Keeping Records During Their Production, Use and Circulation

Responsible Platinum and Palladium Guidance of the London Platinum and Palladium Market (LPPM)

Internal Regulations On Combating the Legalization (Laundering) of Proceeds from Crime, Financing of Terrorism and Proliferation of Weapons of Mass Destruction of URALINTEKH, JSC (hereinafter referred to as the "Internal Regulations")

**4 RESPONSIBILITIES**

4.1 A person responsible for the development and updating of the Policy is Designated Officer appointed by order of Director General.

4.2 Responsibility for fulfilling the requirements of this Policy shall be borne by the heads of the Company's structural units involved in interaction with counterparties and taking part in the process of supplying raw materials and precious metals.

**5 TERMS, DEFINITIONS AND ABBREVIATIONS**

"**Company**" means Ural Innovative Technologies, Joint Stock Company (URALINTEKH, JSC);

"**Designated Officer**" means a person responsible for arrangement and management of the platinum and palladium supply system appointed by order of Director General of the Company;

"**LPPM Guidelines**" means the Responsible Platinum and Palladium Guidance of the London Platinum and Palladium Market (LPPM) valid at a respective period of time;

"**Counterparty (Customer, Supplier)**" means a legal entity or a natural person (individual entrepreneur), which is a party to the contract that delivers raw materials and precious metals;

"**Counterparty Questionnaire**" means a list of questions sent to a counterparty in order to identify the compliance of its activities with the LPPM requirements;

"**Statement on the Counterparty**" means a statement containing information about shareholders, management structure, financial information, information on the number of employees, etc. with the use of software products of information agencies, which are at the disposal of the Legal Department;

"**Designated Employees**" mean employees of the Commercial Directorate who, within the framework of their official duties, conclude and follow-up contracts for reprocessing, purchase and sale of precious metals;

"**Policy**" means the Platinum and Palladium Responsible Sourcing Policy of the Company, which governs the procedure of supply chain management;

"**Counterparty File**" means a folder for each counterparty, which is collected in hard copy and is located in the information network of URALINTEKH, JSC and is subject to update by Designated Employees.

"**Counterparty Risk Assessment Table**" means a form for scoring the counterparty risk assessment.

"**AML/CFT**" means Anti-Money Laundering/Combating the Financing of Terrorism;

"**OECD**" means Organization for Economic Cooperation and Development.

**6 SUPPLY CHAIN MANAGEMENT PHILOSOPHY AND ARRANGEMENT**

6.1 Director General has the authority and is responsible for:

- providing overall management of activities of all structural units within the framework of the current Company's Policy;

- distribution of authorities and liabilities for creating required conditions that enable fulfilling the requirements of the Policy;

- allocation of required resources to ensure the full functioning of the Policy.

6.2 Director General, by internal administrative order, shall appoint a Designated Officer – a person responsible for the arrangement and monitoring of the platinum and palladium supply chain who has the required expertise, knowledge and experience to supervise the Due Diligence process (due diligence with respect to the supply chain).

6.3 Designated Officer shall meet the following requirements:

- have sufficient qualifications, knowledge, experience and training to conduct supply chain analysis (higher education, at least 3 years of work experience);

- have the resources required to perform the appropriate duties (software, intellectual and material resources);

- be able to communicate important information to management, staff and suppliers.

6.4 The Policy requirements apply to the following employees:

- Commercial Directorate – all employees, except for the Procurement Department;

- Legal Department – all employees;

- A special officer appointed by Director General to supervise AML/CFT.

6.5 Designated employees shall be responsible for the following:

- collecting information on counterparties and transactions;

- identifying the counterparty;

- assigning a risk level to the counterparty;

- providing information on counterparties and transactions therewith to Designated Officer in accordance with Sections 4 and 7 of this Policy;

- providing information to Designated Officer for the preparation of an annual report on supply chain management system compliance with the requirements of the LPPM Guidelines and actions taken.

6.6 Designated employees inform counterparties about LPPM Guidelines requirements when entering into a contract by sending letters and questionnaires to counterparties (in the form of Annex 1 or 2), incorporating LPPM requirements in the contract terms, and familiarizing the counterparty with the Policy of URALINTEKH, JSC. The questionnaire completed by the counterparty and sent to the Company, as well as other documents received, shall be attached to the counterparty file by Designated Employee.

6.7 The files of counterparties that conduct transactions with the Company and are involved in the supply chain of raw materials and precious metals shall be reviewed by designated employees when a contract is concluded for the next period or once a year in order to update the information contained therein. The retention period for documents (counterparty file) shall be at least 5 years after the end of the contract.

6.8 If third parties are involved in financial operations (transactions), designated employees shall obtain information and documents from the client enabling the identification and examination of such third parties.

6.9 Designated employees shall assess the level of risk in establishing business relationship before entering into a contract with a new platinum/palladium supplying counterparty.

6.10 In order to identify a legal entity/an individual entrepreneur, designated employees shall request the following information:

For a legal entity:

- certificate of state registration;

- tax registration certificate;

- mining licence/notification (certificate) of special registration with the State Inspectorate of Assay Supervision together with a special registration card;

- mining quota (for suppliers of mineral raw materials, if applicable);

- Articles of Association;

- documents confirming the authority of the signatories to the contract;

- information on bank details, correspondence and legal address, and contact telephone numbers;

- list of the company participants, as amended;

- information on beneficiaries of the counterparty;

- extract from the Unified State Register of Legal Entities (USRLE);

- full and abbreviated names and name in a foreign language, if available;

- other documents as required by the Internal Regulations;

- counterparty questionnaire (for suppliers of mineral raw materials – in the form of Annex A; for suppliers of secondary raw materials – in the form of Annex B). The counterparty may submit a questionnaire in another form provided that such questionnaire contains all required information.

For an Individual Entrepreneur:

- passport;

- tax registration certificates;

- certificate of entry in the Unified State Register of Individual Entrepreneurs;

- extract from the Unified State Register of Individual Entrepreneurs issued not earlier than two months prior to the date of submission;

- notification (certificate) of special registration with the State Inspectorate of Assay Supervision together with a special registration card;

- information on bank details, mailing address, and contact telephone numbers;

- counterparty questionnaire (for suppliers of primary (produced) raw materials – in the form of Annex A; for suppliers of secondary raw materials – in the form of Annex B).

For foreign counterparties: copies of documents (extract from the Trade Register of the country of origin, certificate, document confirming signatory's authority, other documents recognized as such according to the legislation of the country of incorporation, citizenship or residence of a foreign person (constitutional documents) confirming legal status of a foreign legal entity (individual), citizenship or residence of an individual; location of headquarters or registration of an entity.

6.11 Counterparty verification shall include the following actions:

- identification of a counterparty supplying platinum/palladium and verification of its identity using reliable, independent source documents, data or information;

- identification of a beneficial owner (beneficial owners) of the counterparty supplying platinum/palladium;

- verification that the counterparty supplying platinum/palladium and its beneficial owners are not on any list of wanted persons, list of money laundering persons, list of known fraudsters or terrorists, etc. prepared by various government agencies and organizations;

- obtaining business and financial information concerning the counterparty supplying platinum/palladium and information on the purpose and expected nature of the business relationship.

During the review of counterparty documents, in particular constituent documents of a legal entity/individual entrepreneur and documents confirming its state registration, employees shall examine in detail the aspects below (taking into account the available capacity) in order to properly identify their counterparty:

- execution of the counterparty's constituent documents (including all registered amendments and additions) and documents confirming the counterparty's state registration as a legal entity;

- list of founders (participants) of the legal entity, defining inter alia (where possible) a set of persons who can influence decision-making by the bodies of the legal entity;

- structure of the legal entity management bodies and their powers;

- size of the registered and paid-up authorized (joint stock) capital or size of the authorized fund and property;

- relevance of documents (documents shall be valid on the date of submission thereof).

When it is established that a representative acts on behalf of the counterparty, the designated employees shall:

- identify the representative, verify their powers, and identify the counterparty being represented.

Designated Employee may request the legal department to perform additional screening of the supplier if there are doubts about the documents provided by the counterparty, or to obtain additional information about the counterparty's activities.

All documents received during the counterparty identification process are included in the counterparty's file. Printed documents from the file are stored in the Commercial Directorate, while electronic documents are stored in the Company's information resources. The counterparty file also includes documents received by designated employees as part of AML/CFT procedures.

Based on the results of the screening, Designated Employee shall complete a questionnaire in the form of Annex 1 of the Internal Regulations in force in the Company.

6.12 Following the identification of the counterparty, Designated Employee shall perform a risk assessment of the counterparty concerned in accordance with Section 5 of this Policy, complete the Risk Assessment Table in the form of Annex E, and assign an appropriate level of risk: low, medium, or high.

If a supplying counterparty of primary (produced) raw materials is assigned a high risk level, the Designated Employee shall additionally request from the counterparty a questionnaire in the form of Annex B (the questionnaire is selected depending on the size of the supplier)

6.13 Designated Employees shall forward the hard copies of completed Risk Assessment Tables to Designated Officer. Designated Officer shall examine the counterparty file, check the completeness of the counterparty verification, and give an instruction to request additional documents, if necessary. Following the check, Designated Officer may change the risk level assigned by the Designated Employee, which is noted in the Risk Assessment Table.

If a counterparty is assigned a high risk level, Designated Officer shall direct to perform an enhanced due diligence, which includes:

- An on-site study/visit to the counterparty (platinum/palladium mining sites and platinum/palladium supplier's office in case of secondary platinum/palladium supplies) for high-risk supplies to validate the documented results of the supply chain due diligence to be conducted within the first year of the business relationship. The study results shall be reported in the form of Annex G (for primary (produced) raw material suppliers) or Annex D (for secondary raw material suppliers);

- For produced platinum/palladium: identity verification using reliable, independent source documents, data or information, and verification of government check-list information shall be conducted for each company that participates in a chain located in high-risk areas affected by conflict or human rights abuse, from the mine to the refinery (including platinum/palladium producers, intermediaries, platinum/palladium traders and exporters, as well as carriers);

- For recycled platinum/palladium: identity verification using reliable, independent source documents, data or information, and verification of government check-list information shall be conducted for each company that participates in a chain located in high-risk areas affected by conflict or human rights abuse, from the platinum / palladium suppling counterparty to the refinery (including carriers).

Based on the results of the screening, Designated Officer shall confirm the possibility of entering into a contract with the counterparty.

If the counterparty is assigned a high risk level, Designated Officer shall forward the Risk Assessment Form to Director General of the Company to decide whether to enter into a contract/continue cooperation with the counterparty.

6.14 If unusual transactions with counterparties that conduct platinum/palladium transactions are identified as part of the AML/CFT programme verification, a special officer shall inform a Designated Officer of the existence of such transactions.

6.15 If a counterparty is found to be in violation of the LPPM Guidelines, the designated employee shall inform a Designated Officer thereof in writing (in the form of a memo). Designated Officer shall inform Director General of the information received, who shall decide whether to continue cooperation with the counterparty.

**RISK IDENTIFICATION AND ASSESSMENT IN THE SUPPLY CHAIN**

7.1 When assessing the risk of transactions with counterparties, Designated Employee shall consider the completeness of the information provided, specifics of the counterparty's financial and operating activities, experience in working with the counterparty (if any), geographical features of the supplier and current transactions with platinum and palladium, as well as unusual circumstances and deviations of transactions from accepted standards. Designated employees shall also assess the risks, including:

- Systematic or widespread human rights abuses associated with mining, transportation or trading of platinum/palladium, including the worst forms of child labour, any form of torture, inhuman or degrading treatment, widespread sexual violence or other gross violations of human rights, forced or compulsory labour, military crimes, and crimes against humanity or genocide;

 - Direct or indirect support to illegal non-governmental armed groups, public security forces or private security forces that illegally control mines, traders, other intermediaries, transportation routes through supply chains or illegally impose taxes or extort money or minerals through supply chains ("illegal dissident armed forces, public security forces or private security forces");

- Bribery and deliberate misrepresentation of information regarding the origin of platinum/palladium;

- Failure to comply with payment demands concerning taxes, charges and royalties owed to governments in connection with production, trade and export of minerals from conflict-affected and high-risk areas;

- Money laundering and financing of terrorism;

- Contributing to conflicts.

7.2. The following criteria are used in risk assessment:

High risk:

- Extracted platinum / palladium or processed platinum / palladium originate from, are transited or transported through a high-risk area affected by conflict or human rights abuse;

- Extracted platinum / palladium are said to originate from a country that has limited known reserves, probable resources or expected levels of platinum / palladium production;

- Processed platinum / palladium come in transit from a country that is known or suspected to be a high-risk, conflict-affected or human rights abuse zone;

- The platinum / palladium supplying counterparty or other known superior companies are located in a country that poses a high money laundering risk;

- The platinum / palladium supplying counterparty or other known superior companies or their beneficial owners with significant influence over the platinum / palladium supplying counterparty are politically exposed persons;

- The platinum / palladium supplying counterparty or other known superior companies have high-risk businesses, such as arms manufacture, gaming and casinos, antiques and art, sects and their leaders.

Medium risk:

- The counterparty conducts cash transactions;

- The counterparty was previously assigned a high risk level, and less than 6 months have passed since the date of the risk assessment review;

- Lack of information about the counterparty in independent sources (for new counterparties with whom there was no experience of cooperation).

7.3 In the event of suspected non-compliance with counter-terrorism and anti-fraud measures, an employee of any division shall, on an anonymous basis, send information to email: tatiana.potapova@pm-ural.com.

**8 DEVELOPMENT AND IMPLEMENTATION OF RISK MANAGEMENT MEASURES**

8.1 As part of the interaction with counterparties (during identification, conducting operations and transactions), each counterparty shall be assigned a degree (level) of risk.

8.2 In order to mitigate adverse effects associated with issues identified in the OECD Guidelines, the Company has developed measures based on internationally accepted general principles, standards and procedures for sound supply chain management.

8.3 The assessment of risk degree (level), as well as justification for risk assessment shall be recorded by designated employees, reviewed by Designated Officer and kept in the counterparty file in accordance with Section 6 hereof.

If any risk is identified, Designated Officer shall decide on a risk management framework for that counterparty in accordance with clause 6.13.

8.4 Physically separation and protection of individual goods lots within a risk-prone supply chain.

8.5 Use of risk mitigation mechanisms developed by the Company in case of risk identification or if further checks of the counterparty are required, including:

- continuing to cooperate and advising the counterparty on the possibility to mitigate risks;

- temporarily suspending cooperation with the counterparty whose activities are associated with risk factors, in light of continuing risk mitigation measures that can be assessed;

- terminating cooperation with suppliers, whose activities involve risk factors (as agreed with Director General of the Company) if they do not use risk mitigation means and (or) if such means are inappropriate and (or) unacceptable from the perspective of cost-benefit analysis and capabilities of the Company.

|  |  |
| --- | --- |
| Risk level | Management mechanism |
| Low | Initiation or continuation of cooperation. |
| Medium | Initiation or continuation of cooperation while mitigating the potential consequences of identified risks. |
| High | Suspension of cooperation while mitigating the identified risks by gathering additional information that confirms or disproves the potential for adverse consequences of the risks.ORTermination of cooperation with suppliers that are characterized by the presence of risk factors and/or risk sources. |

**9 TRANSACTION MONITORING**

9.1 To ensure that transactions conducted by the Company in precious metals circulation sphere comply with the requirements of the LPPM Guidelines, the following data is recorded for each precious metals batch received:

- net weight of the batch according to the supplier's data and according to the Company's acceptance data;

- analysis results according to the Company's acceptance data;

- document that is used as a basis for acceptance;

- date of acceptance of the precious metals batch.

The data shall be recorded in the Company's electronic information system.

The data on the results of the supplier analysis is mandatory for receiving during the acceptance of the platinum/palladium batch and shall be stored in the Company's Quality Control Department.

9.2 Acceptance of precious metals shall be performed within the Company on the basis of Orders by designated employees. In the Order, Designated Employee shall indicate the date of the last verification of the counterparty in accordance with Section 4 hereof. If any discrepancies are found in the supplier's documents or if Designated Employee suspects that the delivery is unusual, acceptance of precious metals shall be suspended, and the package shall be isolated until elimination of the discrepancies. If Designated Employee suspects that the delivery is unusual, he or she shall inform a Designated Officer.

9.3 The shipment of precious metals after refining shall be made on the basis of requests from designated employees. When precious metals are shipped, the following details shall be recorded:

- batch net weight according to the Company's data;

- analysis results (content of precious metals in the batch) according to the Company's data;

- date of shipment of the precious metals batch.

The data shall be recorded in the Company's electronic information system.

9.4 Designated employees shall prepare a statement on precious metals flow according to refining contracts for the period from January 1 to June 30, and for the period from July 1 to December 31 of each year, and submit it to Designated Officer.

9.5 Designated Officer shall prepare a Transaction Monitoring Report two (2) times a year stating the information on unusual transactions identified (delivery of precious metals) and checks of the counterparties performed and submit it to Director General for approval.

**10 STAFF TRAINING**

10.1 Designated Officer shall provide briefing to newcomers employed in positions specified in the list under clause 6.4 on the following issues:

- regulations governing principles of supply chain management and principles of combating money laundering and terrorist financing;

- handling counterparty's documents, compiling counterparty dossier and files, etc.

10.2 Designated employees shall also receive AML/CFT training in accordance with the Company's current Internal Regulations.

10.3 Current employees of structural units from the list of positions in clause 6.4 shall receive refresher training every three years or unscheduled training when changes are introduced to the applicable regulations under clause 3.

The briefing shall be confirmed by the employee's signature in the briefing logbook and the trainer's signature.

**11 AUDIT**

The Company shall conduct an annual external audit in order to perform a systematic and independent review to determine compliance and effectiveness of the Policy and compliance with LPPM standards.

11.1 During the audit, the following shall be verified:

- appropriateness of the Company's methods and measures aimed at implementation of the recommendations contained in the LPPM Guidelines;

 - availability of adequate external and internal risk mitigation measures;

- compliance with the recommendations contained in the LPPM Practical Guidelines in all types of interaction with platinum / palladium suppliers;

- availability of an effective system for tracking information about all of the Company's activities;

- continuous risk assessment and prompt response based on the findings of such assessment.

11.2 Auditor requirements:

The Company's platinum / palladium supply chain management systems and methods shall be audited by independent and competent third parties included in the list of approved auditors available on the LPPM website ([www.lppm.com](http://www.lppm.com)).

An organization that perform the Company audit shall meet the following criteria:

- independence from the Company being audited;

- no conflict of interest between the auditor and the Company (business or financial relationship);

- unacceptability of providing any services to the Company being audited in connection with due diligence audit, other than general recommendations on that matter;

- competence required to conduct such audit.

11.3 In undertaking assurance engagements, auditors shall apply ISAE 3000 and refer to the Guidelines on Third Party Audit, particularly those sections that provide additional guidance on the application of ISAE 3000.

11.4 The audit process includes the following activities:

- preparation for the audit: plan development;

- site visit audit;

- consultation with the Company's risk assessment team;

- completion of the audit: justification, documenting and reporting of findings evidencing the level of compliance of the audited Company with the LPPM recommendations for supply chain due diligence;

- provision of recommendations to the Company on improvement of due diligence methods;

- summary report on the audit shall be included as part of the Company's annual report on supply chain due diligence.

11.5 The auditors shall prepare a management report including, at least, the following:

- reporting period;

- scope of the audit;

- audit standard and level of assurance;

- description of audit team members;

- qualifications and independence of the audit team members;

- date of the audit;

- number of man-days of the audit;

- summary of assurance procedures;

- supporting observations, findings and recommendations for improvement;

- description of any deviations from compliance;

- conclusion on assurance.

**12 ANNUAL REPORTS**

12.1 Designated Officer shall prepare an annual report on the compliance of the current Company's supply chain management system (Policy) with the established requirements of the LPPM Guidelines and the actions taken.

12.2 The report shall include the following information:

- Company name;

- due date (reporting period);

- country of origin of platinum/palladium extracted and processed;

- overview of actions taken during the period to demonstrate compliance with the LPPM Guidelines requirements;

- extent of the Company's compliance with each section of the LPPM Guidelines;

- opinion of the Company's corporate management on compliance with the LPPM Guidelines.

12.3 If any non-compliance of the Company's supply chain management systems and methods and the Policy with the LPPM Guidelines is identified, Designated Officer shall develop and agree with Director General a corrective action plan, which shall include:

- case description;

- reference to the relevant section of the LPPM Guidelines;

- assigned rating for non-compliance risk;

- corrective actions to be taken for each non-compliance identified;

- completion dates of corrective actions for each non-compliance identified;

- details (name, position) of the Company's employee responsible for performing each corrective action.

Upon the LPPM request, the corrective action plan may be submitted for review by auditors on the completion date prior to the next annual audit date.

12.4. Copies of audit reports and verification reports shall be emailed by the Company to: info@lppm.com and sent in hard copies upon LPPM request.

**ANNEX А**

**Questionnaire – Mined Material**

|  |
| --- |
| **1. COMPANY DETAILS** |
| **a. Name** |  |
| **b. Registered Address** |  |
| **c. Business Address** |  |
| **d. Phone Number** |  |
| **e. Date of Incorporation** |  |
| **f. Country of Incorporation** |  |
| **g. Business Registration Number** |  |
| **h. Tax Identification/Registration Number** |  |
| **i. If listed, indicate name of stock exchange(s) and ticker** |  |
| **j. Website** |  |
| **k. External Financial Auditors Since Date** |  |
| **l. How many direct and indirect****subsidiaries does the company have?***Please provide a Group chart*  |  |
| **2. BUSINESS ACTIVITY** |
| **a. Type Of Business** |

|  |  |  |  |
| --- | --- | --- | --- |
| Large scale mine(>100’000 oz/year) |  | Precious Metals trader |  |
| Medium scale mine(30-100’000 oz/year) |  | Others, please specify:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |
| Small scale mine(<30’000 oz/year) |  |  |  |

 |
| **b. Description of Core Business Activity** |  |
| **c. In which country/ies do you currently refine your precious metals?** |  |
| **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** |
| **a. Board of Directors** |  |  |  |  |
| **b. Top Management** |  |  |  |  |
| **5. FINANCIAL INFORMATION** |
| **5.1. Financial statements details** |
|  | **Currency** | **Last Reporting Period** | **Previous Year** |
| **a. Share Capital** |  |  |  |
| **b. Total Shareholder’s Equity** |  |  |  |
| **c. Total Balance Sheet** |  |  |  |
| **d. Sales** |  |  |  |
| **e. Net Income** |  |  |  |

*Please provide copy of latest annual report*

|  |
| --- |
| **5.2. Other Financial Information** |
| **f. Source of mining operation funding** |

|  |
| --- |
|  Own equity |
|  Government entity, name(s): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  Bank loan, name(s): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  Other third party loan, name(s): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

 |
| **g. What usual payment method does the Company use to pay its suppliers?** |

|  |  |
| --- | --- |
| **Payment type** | **Percentage (%)** |
| Bank transfers |  |
| Checks |  |
| Cash |  |
|  |  |

 |
| **6. REGULATORY ENVIRONMENT** | **YES** | **NO** | **N/A** |
| **a. Does your Company need to comply with detailed health and safety regulations in the country/province of operations?** |  |  |  |
| **b. Does your Company need to comply with detailed environmental regulations in the country/province of operations?** |  |  |  |
| **c. Is child labour regulated in mining activity in the country/province of operations?** |  |  |  |
| **d. Are public security forces used on or around the mine site?** |  |  |  |
| **7. HUMAN RESOURCES** |
| **a. Number of employees within the Company** |  |
| **b. Number of employees within the Group** |  |
| **8. ORIGIN OF PHYSICAL PRECIOUS METALS, CAPACITY AND MINING PRACTICES** |
| **a. From how many mining site(s) is the Pt/Pd 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?***Please provide a copy/ies*  |  Yes NoDate 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 Pt/Pd 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)?** |  Yes, please describe: No |
| **k. Are there comprehensive procedures and systems at the mining site to avoid negative impact to the environment by precious metal extraction (such as adequate tailing treatment, system to avoid pollution emission, etc)?** |  Yes, please describe: No |
| **l. Does the mining site engage with affected communities and support local community development?** |  Yes, please describe: No |
| **m. Is there a comprehensive procedure at the mining site to ensure prevention of child labour?** |  Yes, please describe: No |
| **n. Are there any armed groups stationed on/near the mine site?***If yes, please provide information as to the reason:* |  Yes, please describe: State Armed group Non State Armed Group Public or private security forces \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ No |
| **o. Does the Mining Company employ professional security forces to control the mine site?** |  Yes  No |
| **p. Has the Regulator responsible for mining operations carried out an on-site visit** |  Yes, date of last visit: \_\_\_\_\_\_\_\_\_\_\_\_\_\_ No |
| **q. If no on-site visit has been performed yet (question p above), is there any visit planned?** |  Yes, date of planned visit: \_\_\_\_\_\_\_\_\_\_\_\_ No |

|  |
| --- |
| **9. PROCESSING PLANT** |
| **a. Where exactly is the Pt/Pd processing plant(s) located (country, province, closest city, GPS coordinate)?** |  |
| **b. How many people are working in the Pt/Pd processing plant?** |  |
| **c. Is the Pt/Pd processing plant held by the mining company or is it outsourced to an external party?** |  Mining company processing plant Pt/Pd processing outsourced to an external plant: Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| **d. If the Mining Company has its own processing plant, does it also source mined Pt/Pd for processing from external parties?** |  YesName and location of mining sites: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ No |
| **e. What is the Pt/Pd processing method (processing equipment & methods)?** |  |
| **f. What chemical products are used during processing?** |  Hydrochloric acid Chlorine Others, please specify: |
| **g. What is the capacity of the processing plant per day?** |  |
| **h. Is your Company legally required to have a license to export precious metals?** |  Yes – Please provide a copyDate of issue: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Expiry date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ No N/A |
| **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)?** |  Yes, please describe: No |
| **j. Does the processing plant have comprehensive processes to avoid negative impact to the environment by Pt/Pd processing (such as, off gas and adequate tailing treatment, systems to avoid pollution emission, etc)?** |  Yes, please describe: No |
| **k. Does the processing plant engage with affected communities and support local community development?** |  Yes, please describe: No |
| **l. Does the processing plant have a comprehensive procedure to ensure prevention of child labour?** |  Yes, please describe: No |
| **m. Is there any armed groups stationed on/near the processing plant?** |  Yes State Armed group Non State Armed Group Public or private security forces \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ No |
| **n. Does the processing plant employ professional security forces to control the plant** |  Yes  No |
| **MATERIALS** |
| **a. What type of precious metals is the Company planning to send for refining?** Pt Others, please specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Pd |
| **b. What is the form of Pt/Pd planned to be sent for refining?** |
| **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?** |  YesIf yes, how many and for what purpose?\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ No |

|  |
| --- |
| **10. RESPONSIBLE PRECIOUS METALS SUPPLY CHAIN POLICY** |
| **a. Did your company establish a responsible supply chain of Pt/Pd 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?** [**http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf**](http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf) |  Yes **–** *Please provide a copy* No |
| **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?** |  Yes No |
| **c. Does your company comply with any of the following industry initiatives:** RJC Chain of Custody Standard RJC Code of Practices Fair Trade Standard Fair Mine Standard Others, please specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ *Please provide a copy of the certification*  | Additional comments: |
| **d. What are the procedures in place to ensure that the precious metals purchased have not financed conflict?** |  |

|  |
| --- |
| **11. ANTI MONEY LANDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)** |
| **a. Is your company subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation?** |  Yes – Please fill in the Wolfsberg questionnaire attached 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?** |  Yes – **Please provide a copy** No |

|  |
| --- |
| **12. BRIBERY POLICY** |
| **a. Does your Company have a bribery policy in place?** |  Yes – **Please provide a copy** 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?** |  Yes – **Please provide details** 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** |
| **Corporate Name:****Location:** |
| **If you answer “no” to any question, please ensure that an explanation and additional information is supplied at the end of the relevant section.** |

|  |  |  |
| --- | --- | --- |
| ***I. General AML Policies, Practices and Procedures:*** | **YES** | **NO** |
| 1. Is the AML compliance program approved by the Corporate’s board or a senior committee?
 |  |  |
| 1. 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?
 |  |  |
| 1. Has the Corporate developed written policies documenting the processes that they have in place to prevent, detect, and report suspicious transactions?
 |  |  |
| 1. 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?
 |  |  |
| 1. 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).
 |  |  |
| 1. 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?
 |  |  |
| 1. Does the Corporate have policies covering relationships with politically exposed persons (PEP’s), their family and close associates?
 |  |  |
| 1. Does the Corporate have record retention procedures that comply with applicable law?
 |  |  |
| 1. 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?
 |  |  |
| ***II. Risk Assessment*** | **YES** | **NO** |
| 1. Does the Corporate have a risk-based assessment of its customer base and their transactions?
 |  |  |
| 1. 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?
 |  |  |
| ***III. Know Your Customer, Due Diligence and Enhanced Due Diligence*** | **YES** | **NO** |
| 1. Has the Corporate implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?
 |  |  |
| 1. Does the Corporate have a requirement to collect information regarding its customers’ business activities?
 |  |  |
| 1. Does the Corporate assess its FI customers’ AML policies or practices?
 |  |  |
| 1. Does the Corporate have a process to review and, where appropriate, update customer information relating to high risk client information?
 |  |  |
| 1. Does the Corporate have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information?
 |  |  |
| 1. Does the Corporate complete a risk-based assessment to understand the normal and expected transactions of its customers?
 |  |  |
| ***IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds*** | **YES** | **NO** |
| 1. Does the Corporate have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?
 |  |  |
| 1. Where cash transaction reporting is mandatory, does the Corporate have procedures to identify transactions structured to avoid such obligations?
 |  |  |
| 1. Does the corporate screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?
 |  |  |
| 1. 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?
 |  |  |
| ***V. Transaction Monitoring*** | **YES** | **NO** |
| 1. Does the Corporate have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc
 |  |  |
| ***VI. AML Training*** | **YES** | **NO** |
| 1. 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?
 |  |  |
| 1. Does the Corporate retain records of its training sessions including attendance records and relevant training materials used?
 |  |  |
| 1. Does the Corporate communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?
 |  |  |
| 1. Does the Corporate employ third parties to carry out some of the functions of the Corporate?
 |  |  |
| 1. If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes:
* Identification and reporting of transactions that must be reported to government authorities;
* Examples of different forms of money laundering involving the Corporate’s products and services;
* Internal policies to prevent money laundering
 |  |  |

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

**ANNEX Б**

**Questionnaire – Recyclable Material**

|  |
| --- |
| **1. РЕКВИЗИТЫ КОМПАНИИ** |
| **a. Name** |  |
| **b. Registered Address** |  |
| **c. Business Address** |  |
| **d. Phone Number** |  |
| **e. Date of Incorporation** |  |
| **f. Country of Incorporation** |  |
| **g. Business Registration Number** |  |
| **h. Tax Identification/Registration number** |  |
| **i. If listed, indicate name of stock exchange(s) and ticker** |  |
| **j. Website** |  |
| **k. External Financial Auditors** |  |
| **l. How many direct and indirect subsidiaries does the company have?** *Please provide a Group chart* |  |
| **2. BUSINESS ACTIVITY** |
| **a. Type of Business** |

|  |  |  |  |
| --- | --- | --- | --- |
| Bank |  | Jeweller |  |
| Precious Metals  |  | Scrap dealer |  |
| Trader/Dealer |  |  |  |
| Other Financial Intermediary |  | Coins dealer |  |
| Industrial |  | Mint |  |
| Wholesaler |  | Others, please specify: |  |
|  |  |   |  |

 |
| **b. Description of core business activity** |  |
| **c. Does the company hold a license to conduct its business(es)?***Please provide a copy(ies)* |  |
| **d. Main Market** |  |
| **e. Main Products** |  |
| **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** |
| **a. Board of Directors** |  |  |  |  |
| **b. Top Management** |  |  |  |  |
| **5. FINANCIAL INFORMATION** |
|  | **Currency** | **Last Reporting Period** | **Previous Year** |
| **a. Share Capital** |  |  |  |
| **b. Total Shareholder’s Equity** |  |  |  |
| **c. Total Balance Sheet** |  |  |  |
| **d. Sales** |  |  |  |
| **e. Net Income** |  |  |  |

*Please provide copy of latest annual report*

|  |
| --- |
| **6. HUMAN RESOURCES** |
| **a. Number of employees within the Company** |  |
| **b. Number of employees within the Group** |  |
| **7. ORIGIN OF PHYSICAL PRECIOUS METALS** |
| **a. Profile of your precious metals’ suppliers (Individual / Company)** |  |
| **b. Country(ies) of origin of precious metals delivered to us?** |  |
| **c. Countries of destination of precious metals delivered once refined?** |  |
| **d. Is the Company legally required to have a license to import precious metals?** |  Yes – Please provide a copy No N/A |
| **e. Is the Company legally required to have a license to export precious metals?** |  Yes – Please provide a copy No N/A |
| **8. FACILITIES** | **YES** | **NO** | **N/A** |
| **a. Does the Company have any smelting or refining facilities?** |  |  |  |
| **b. Does the Company have any manufacturing facilities?** |  |  |  |
| **c. Does the Company produce its own jewellery?** |  |  |  |
| **d. What are the types, forms and percentage of precious metals sourced by the Company**

|  |  |
| --- | --- |
|  | **Recycled precious metals (% \_\_\_\_ )** |
|  | LPPM GD Bullion |  Non LPPM Good Delivery Bullion (Pt/Pd =>9995) |
|  | Rudimentary Bars |  Jewellery |  Sponge |
|  | Coins |  Collected waste |  Others, please specify |
|  |  |  |   |
|  | **Primary material – mined precious metals (% )** |

 |
| **e. What type of precious metals is the Company planning to send for refining?**

|  |  |
| --- | --- |
| **Pt** |  **Others, please specify:** |
| **Pd** |   |
|  |  |

 |
| **f. What is the form of precious metals planned to be sent for refining?**

|  |
| --- |
|  **Unprocessed recycled precious metals** |
| LPPM GD Bullion |  Non LPPM Good Delivery Bullion (Pt/Pd =>9995) |
|  Coins |  Jewellery |  Sponge |
|  Own production waste |  Collected waste |  Others, please specify |
|  |  |  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  **Melted recycled precious metals** |  |
|  Rudimentary Bars (undefined dimension and fineness) |  Others, please specify: |
|  |  |   |

 |
| **9. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY** |
| **a. Did your institution establish a responsible supply chain of precious metal 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?** [**http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf**](http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf) |  Yes **– Please provide a copy** No |
| **b. Does your institution comply or plan to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?** |  Currently complies Plans to comply  No |
| **c. Is the company complying with any of the following industry initiatives:** LPPM Responsible Pt/Pd Guidance LBMA Responsible Gold Guidance LBMA Responsible Silver Guidance RJC Chain of Custody Standard WGC Conflict Free Gold Standard Conflict Free Smelter (CFS) ProgramOthers, please specify: \_ | Additional comments: |
| **d. What are the procedures in place to ensure that the precious metals purchased have not financed conflict?** |  |
| **10. ANTI MONEY LANDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)** |
| **a. Is your institution subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation?** |  Yes No |
| **b. Name of the AML-CFT Law/Regulation** |  |
| **c. Name of the Regulator** |  |
| **d. Has your institution established a conformity program that contains AML/CFT policies and procedures, according to internal & international laws, rules, and standards?** |  Yes **– Please provide a copy** No |
| **11. BRIBERY POLICY** |
| **a. Does your Company have any bribery policy in place?** |  Yes **– Please provide a copy** 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?** |  Yes **– Please provide details** No  |
| **12. DATA PRIVACY PROTECTION** |
| **a. Does your company have Data Protection Policy?** |  Yes No |
| **b. Does your company have Data Protection Commissioner?** |  Yes No |
| **c. Does your company have a certified data storage system or an information system?** |  Yes No |
| **d. Does your company have an anonymous whistleblowing communication pathway through which employees may express concerns about the origins of sourced material?** |  Yes No |
| **13. PRECIOUS METALS SUPPLIERS DUE DILIGENCE QUESTIONNAIRE** | **YES** | **NO** | **N/A** |
| ***Organization*** |  |  |  |
| **a. Does the Company have a person responsible (Compliance Officer) for all AML-CFT matters (Due Diligence, AML policies, internal training)?**If yes, please provide us with his/her name, phone number and e-mail address |  |  |  |
| **b. Is the Company subject to an AML-CFT audit by an independent party or a governmental party?**Date of your last AML-CFT compliance audit: |  |  |  |
| **c. Does the Company have an AML-CFT training program for its employees?** |  |  |  |
| **d. Does the Company delegate to third parties some of the compliance functions to be carried out?**If yes, what functions and to which company do you delegate? |  |  |  |
| **e. How long does the Company keep its due diligence files (records)?** |  |
| **f. What is the typical profile of your precious metals’ suppliers?**

|  |  |
| --- | --- |
|  Corporate (%\_) |  |
|  Individual persons (%\_) |  |

 |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **g. What type of information does the Company request from its precious metals’ suppliers?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Companies** | **YES** | **NO** | **Individuals** | **YES** | **NO** |
| Company name |  |  | Name and first name |  |  |
| Address |  |  | Address |  |  |
| Date of Incorporation |  |  | Date of birth |  |  |
| Country of Incorporation |  |  | Nationality |  |  |
| Business register extract or equivalent document |  |  | Copy of ID card or passport |  |  |
| Beneficial Owners |  |  | Beneficial Owners |  |  |
| Origin of Precious Metals |  |  | Origin of Precious Metals |  |  |
| Description of main activity and financial information |  |  | Supplier profile (activity, wealth, etc.) |  |  |

 |
| **h. Does the Company have a risk-based assessment of its precious metals’ suppliers (e.g., low, medium, or high risks)?** |  |  |  |
| **i. Does the Company screen precious metals suppliers and transactions against lists of persons, entities or countries issued by government/competent authorities?** |  |  |  |
| **j. Does the Company perform enhanced due diligence for high risk precious metals suppliers?** |  |  |  |
| **k. Does the Company assess its corporate precious metals suppliers’ AML-CFT and purchase procedures and practices?** |  |  |  |
| ***Transactions monitoring*** | YES | NO | N/A |
| **l. Does the Company perform a risk-based assessment to understand the normal and expected transactions of its suppliers (in order to identify the unusual transactions)?** |  |  |  |
| **m. Does the Company have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments (e.g., traveller’s cheques) or third-party payments?** |  |  |  |
| **n. Does the Company have to register all purchases and sales?** |  |  |  |
| **o. From which of the following suppliers does the Company purchase its precious metals and what is the average amount of purchase by deal.**

|  |  |  |
| --- | --- | --- |
| **Supplier type** | **Purchase percentage (%)** | **Average amount in USD per deal** |
| Bank |  |  |
| Corporate |  |  |
| Individual |  |  |

 |
| **p. What usual payment method does the Company use to pay its precious metals suppliers?**

|  |  |
| --- | --- |
| **Payment type** | **Percentage (%)** |
| Bank transfers |  |
| Checks |  |
| Cash |  |

 |
| **q. Does the Company have a procedure in place to prevent, detect and report suspicious transactions from its suppliers to the relevant Authority?** |  |  |  |
| **r. How many suspect reports has the Company filled and handed over to the relevant Authority the last two years?** |  |
| **s. Does the Company have a maximum amount as per internal policy or regulatory framework:****amount allowed for cash payment?**If yes, how much?**amount of deal per supplier in USD?**If yes, how much? |  |
|  |
| **t. Where cash transaction reporting is mandatory, does the Company have procedures to identify transactions structured to avoid such obligations?** |  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
| **14. TRANSACTION MONITORING ON PURCHASE FROM INDIVIDUALS ONLY** | YES | NO | N/A |
| - **TO BE FILLED ONLY BY COMPANY PURCHASING PRECIOUS METALS FROM INDIVIDUALS**  |  |  |  |
| **a. Does the Company perform statistics on precious metals sold by person in order to identify unusual transactions?** |  |  |  |
| **b. Does the Company have a specific procedure if a deal with an individual is significantly higher than the average deal?**If yes, please describe:   |  |  |  |
| **c. Is the Company able to verify that a person does not come several times in the counter/in different counters to sell each time a small amount but for a global material amount (smurfing)?**If yes, how?   |  |  |  |
| **15. INDUSTRIAL SOURCING – TO BE FILLED ONLY BY INDUSTRIAL COMPANIES** | **YES** | **NO** | **N/A** |
| **a. What type of precious metals do you purchase for industrial purposes?**

|  |  |  |
| --- | --- | --- |
|  LPPM GD Bullion |  Non LPPM Good Delivery Bullion (Pt/Pd =>9995 e.g., sponge) |  |
| Grains |  Semi-finished products |  Industrial products, please describe |
|  Others, please specify |  |   |
|   |  |   |

 |
| **b. In which country do you purchase your precious metals products?** |  |
| **c. From whom do you source your precious metal products?**

|  |  |  |
| --- | --- | --- |
|  Refineries |  Precious metals dealers |  |
| Banks |  Industrial |  Others, please specify |

 |
| **d. Have you identified the refinery which produced the precious metals used in your supply chain?** |  Yes No |
| **e. Have you assessed the refiner’s due diligence policies and practices?** |  |  |  |

Comments / Additional information (please indicate which question the information is referring to)

**SIGNATURE**

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

I undertake to automatically inform [*The refinery*] of any material changes.

|  |  |  |
| --- | --- | --- |
|  | **Authorised signatory** | **Authorised signatory** |
| **Signature:** |  |  |
| **Print Name:** |  |  |
| **Title:** |  |  |
| **Company Name** |  |  |
| **Date and Location:** |  |  |

**ANNEX В**

**SELF-ASSESSMENT QUESTIONNAIRE**

**ASM SUPPLY CHAIN**

|  |
| --- |
| **1. MINING SITE INFORMATION** |
| 1.1 | Name of the Mine Site(s)· Territory· Province· Country |  |
| 1.2 | Is the mine approved by a relevant ASM (Artisanal and Small-Scale Mining) Sector standard (e.g., RAGS, CRAFT, IRMA)If yes please attach a copy of the last audit report and certificate |  |
| 1.3 | Describe tenure status:· Title holder· Permit holder, type, status, time period of permit (exploration, etc.)· License holder, type, and status of licenseAttach if applicable :· Mining Title· Permit· License· Mine-level agreement |  |
| 1.4 | Minerals produced (plus annual totals) |  |
| 1.5 | Number of pits or tunnelsName of pits or tunnels, if applicable(detail each separately). |  |
| 1.6 | Method of platinum and/or palladium processing (list any chemicals used). |  |
| 1.7 | Do conditions of extraction involve the presence and involvement of non-state armed groups or public or private security forces? | If yes please provide details . |

|  |  |  |
| --- | --- | --- |
| 1.8 | Do third parties illegally tax or extort money or minerals at mine site? |  |
| 1.9 | Name and description of the cooperative, association, or other structure of artisanal miners. | Please provide names or organizational charts and % ownership/stake. |
| 1.10 | Are there other cooperatives on site? | If yes, please provide details. |
| 1.11 | Please provide the name, first name, nationality, residence, date of birth of the management/representatives of the cooperative/association. |  |
| 1.12 | Is there a presence of children on site? | If yes, please provide details. |
| 1.13 | Are children engaged in any activities defined by the International Labour Organisation as “worst forms of child labour" at the mine site? | If yes, please provide details. |
| 1.14 | Describe the measures taken to ensure that no children are illegally (in accordance with national law) working on the mine site. |  |
| 1.15 | Government, political party, or military affiliation of the leadership of cooperative/association or miners’ teams |  |
| 1.16 | Any evidence of “serious abuses” (as described in OECD DDG Annex II) at the mine site. | If yes, please provide details. |
| 1.17 | Status of site validation by government or designated authority.If validation in progress, describe steps to finalisation, risks, and mitigation measures |  |

|  |
| --- |
| **2 SOCIAL, ENVIRONMENTAL AND GOVERNANCE** |
| 2.1 | Type of mining (open-pit, alluvial, tunnels). |  |
| 2.2 | Description of tunnels and the security measure for mining in tunnels, if applicable. |  |
| 2.3 | Health and safety of miners on the site (protective equipment, security of pits/tunnels, use of chemical, etc.) |  |
| 2.4 | Describe environment (e.g., Electricity (sources), Phone network coverage, Internet coverage, Other comments). |  |
| 2.5 | Describe the requirements to be part of this cooperative / association (if applicable). |  |
| 2.6 | Estimated total number of miners and number of miners registered with relevant local or national agencies. |  |
| 2.7 | Activities of men and women on the site.Are these activities legitimate?Describe the activities carried out bywomen on site.Describe the presence of anypregnant women on site and theiractivities. |  |
| 2.8 | Describe positive and negative impacts of mining site over community. |  |
| 2.9 | Describe any environmental or social assessments that have been undertaken of the mining site.If no third-party assessment exists, provide information of impact of mining activity on environment and social impacts. |  |

|  |
| --- |
| **3 SYSTEM TO ESTABLISH SUPPLY CHAIN CONTROL, TRANSPARENCY, AND INFORMATION COLLECTION** |
| 3.1 | Are supply chain actors operating in a conflict-affected or high-risk area? |  |
| 3.2 | Please provide documentation to describe system used to establish transparency, information collection, and control of the supply chain to be able to identify origin of material, i.e., Traceability (e.g., bag and tag or electronic system to physically trace minerals)Chain of custody (a range of documents that identify the provenance of minerals and their transport routes). | Add additional sheets for supplemental information if necessary |
| 3.3 | Are there any other supply chain intermediaries?If yes, note whether an additional KYC form will be used to seek supplementary information. |  |
| 3.4 | Are there specific weaknesses in the traceability or chain of custody system that would allow conflict material to enter the supply chain? Describe other sources of material which could be mixed at the mine, by a trader, in transport, or at the premises of the exporter.What quantity (value/volume/percent of total) could potentially infiltrate the system? Evaluate the likelihood of this occurring. |  |
| 3.5 | Is a unique reference number assigned to each output?Are securities practices over gold such as sealed security boxes for shipment adopted in such a manner that tampering or removal of content during transport will be evident. |  |

|  |  |  |
| --- | --- | --- |
| 3.6 | Is the immediate proximity of the entire supply chain free of militarization and/or the presence of armed groups?If not, is further risk assessment required or are mitigation measures needed?If yes, please describe recommended steps. |  |
| 3.7 | Are there other recent activities or issues in the region of supply chain which could quickly escalate the risk of conflict or human rights abuses? |  |

|  |
| --- |
| **4 GOVERNMENT AND TAXES** |
| 4.1 | Describe the system of tax, royalties and rights paid to government institutions and government officials for extraction, trade, and export of Pt/Pd. |  |
| 4.2 | Are taxes, royalties and fees related to mineral extraction, trade and export being paid to government institutions and officials? |  |

Self-Assessment form completed by:

Position:

Signature:

Date:

|  |
| --- |
| **REFINER REVIEW**  |
| General comments: |
| Risk rating | Low | Medium | High |
| Site visit required |  YES NOComments: |
| Reviewed by Name: |
| Position: |
| Signature: |
| Date of current review: |
| Date of next review: |

**LSM SUPPLY CHAIN**

|  |
| --- |
| **COMPANY INFORMATION**  |
| Company Name | Please attach a link to company website |
| Registered address |  |
| Name of the mine |  |
| Location of the mine | TownRegionCountry |
| Name of the mine site operator if not a wholly owned subsidiary |  |

|  |
| --- |
| **GOVERNANCE** |
| Company PoliciesDoes the company have the following policies, please attach a copy or a link to the relevant page on the corporate website | Mission statement □Code of conduct □Anti-bribery and corruption □Business integrity and ethical □Conflict minerals □Environment Health and Safety □Environmental Impact Assessment □HR policies □Modern slavery and human trafficking □Procurement policy □Whistleblowing policy □ |
| Industry Memberships please list relevant industry association memberships (e.g., WGC, ICMM, EITI) Extractive Sector Transparency Measures Act (ESTMA). |  |
| Has the Company signed up to relevant industry codes of conduct? If yes how are these commitments verified? |  |
| Permit(s) type(s): |  |
| Have the Local authorities performed an on-site visit in the past 12 months? | □Yes □No If yes please provide a copy or a link to the report  |
| Is a visit by local authorities planned in the next 12 months? | □ Yes□ No |
| Approximate total number of workers directly employed at the mine |  |
| Do you have a policy prohibiting child labour? | □Yes □No \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_If yes please attach a copy or link to the policy |
| Are any workers employed by subcontractors? | □ Yes□ NoIf yes how many on average \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Is employment freely chosen? | □Yes□No |
| Do you prohibit any use of forced labour (e.g.: not permitting employees to change jobs) including bonded or involuntary prison labour | □Yes □No \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_If yes please attach a copy or link to the policy |
| Do miners live on the premises of the mine (e.g.: in a dormitory)?If yes please describe the facilities (e.g. washrooms, canteens, recreational facilities) | □Yes□No |

|  |  |
| --- | --- |
| Are working hours, excluding overtime limited to a maximum of 48 hours per week? | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Have you received any reports or complaints of pressure, threats, bad or degrading treatment, etc. from employees or third parties, including sexual violence? | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Are the employees represented by a syndicate or equivalent body? | □Yes□No  |
| Have the employees been on strike during the past 12 months? | □ Yes□ NoIf yes, please explain why: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Do you have a policy that prohibits discrimination on the grounds of race, caste, national origin, religion, and sexual orientation? | □Yes □No \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_If yes please attach a copy or link to the policy |
| Other comments: |  |

|  |
| --- |
| **HEALTH AND SAFETY**  |
| Did you have a visible health & safety policy? | □Yes □No \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_If yes please attach a copy or link to the policy |
| Did you provide adequate first aid equipment and training? | □ Yes □ No \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_If yes please provide brief details of the measures taken |
| Is the workplace environment secure? | □ Yes □ No \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_If yes please provide brief details of the measures taken |
| Is personal protective equipment (PPE) freely available for employees and site contractors? (e.g., head protection, safety footwear, protective clothing, face mask, etc.) | □ Yes□ No |
| Do you enforce compliance to PPE requirementsby all personnel?How is compliance recorded? | □ Да□ Нет |
| Does the mine provide safety training to visitors? | □ Yes □ No \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_If yes please provide brief details of the training |
| Does the mine use the accident rate as key performance indicator? | □ Yes □ No \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_If yes please provide brief details of the measures taken and targets |
| What is the mine safety track record for the past 24 months? |  |

|  |  |
| --- | --- |
| Are there appropriate procedures to train security personnel | □Yes□NoComments \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Is site security managed in-house or outsourced to a third party? | Comments \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Other comments: |  |
| Are there appropriate procedures to train security personnel | □Yes□NoComments \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Other comments: |  |

|  |
| --- |
| **Platinum and Palladium Extraction and Processing Method**  |
| Please describe the mining site (open pit, underground, etc.) |  |
| Please describe the extraction techniques. |  |
| What is the annual production in tonnes? |  |
| Please describe the processing techniques, including chemical products used. |  |
| What type of material will be sent to refiners for processing? |  |
| Is the infrastructure and/or the equipment set up proportionate to the production figures? | □Yes□NoComments \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Is there any routine maintenance programme for mining equipment, and are maintenance records kept? | □Yes □No \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_If yes please attach a copy or link to the policy |
| Please describe the method/process to avoid negative impact on the environment (e.g.: adequate tailing treatment, system to avoid pollution emission, etc). |  |
| Do you have procedures for storing, using and disposing of hazardous chemicals? | □ Yes □ No \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_If yes please provide brief details of the measures taken |
| Other comments: |  |
| **Artisanal Mining Next to the Mine Site**  |
| Have you identified any artisanal miners next to the mine site? | □ Yes□ No |
| If Yes, estimate the number of ASM miners on the concessions. |  |
| Can these ASM miners be considered Legitimate ASM? | □ Yes□ No |
| How does the mine handle artisanal miners next to the mine site? |  |
| Have there been any instances of conflict or tension? If yes please describe. | □ Yes□ NoComments \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Does the mine source from artisanal miners on its concession? | □ Yes□ No |
| Does the mine source ore or doré from mines outside its concession? | □ Yes□ No |
| Other comments: |  |

|  |
| --- |
| **CONFLICT AREA AND SECURITY**  |
| Is the mine located in a conflict area? | □ Yes□ No |
| Are there any armed groups stationed on/near the mine site? | □ Yes□ No |
|  | If yes:Is it state armed groups?□ Yes □ NoIs it Non state armed groups?□ Yes □ NoIs it public or private security forces?□ Yes □ No |

|  |  |
| --- | --- |
| Please describe the general site security infrastructure (CCTV, perimeter fence, controlled access etc.) |  |
| Please describe the precious metal storage security infrastructure and processes. |  |
| Please describe storage facility and security of hazardous chemicals. |  |
| How do you assess the security infrastructure? | □ Adequate□ InadequateComments \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Have you identified any indication of illegal taxation or extortion of money across the whole supply chain? | □ Adequate□ InadequateComments \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Please describe the environment relating to tax/fees/royalties paid to government (taxes on the extraction, trade, transport, and export of gold). |  |
| Other comments: |  |

|  |
| --- |
| **TRANSPORTATION** |
| Please describe transportation method from mine site to export location. |  |
| Other comments: |  |

Self-Assessment form completed by:

Position:

Signature:

Date:

|  |
| --- |
| **REFINER REVIEW**  |
| General comments: |
| Risk rating | Low | Medium | High |
| Site visit required |  YES NOComments: |
| Reviewed by Name: |
| Position: |
| Signature: |
| Date of current review: |
| Date of next review: |

**ANNEX Г**

**SITE VISIT FORM – MINED MATERIAL**

Visited by (Name of Representative): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date of the visit: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Purpose** To standardise the on-site visit report documentation

|  |
| --- |
| **Customer** |
| Name: |  |
| Name of the mine: |  |
| GPS coordinates of the mine: |  |
| Name of the mine site operator: |  |
| Name of the mine owner if different and start/end of mining rights: |  |

|  |
| --- |
| **Permit** |
| Permit(s) type(s): |  |
| Have the Local authorities already performed an on-site visit? | □Yes□No |
| Is a visit by local authorities planned in the next 12 months? | □Yes□No |

|  |
| --- |
| **Mine workers** |
| Approximate total number of workers: |  |
| Have you seen any evidence of children working during the site visit? | □Yes□No If yes, please indicate their tasks: |
|  |
|  |
| Have you seen any evidence of vulnerable individuals or groups working during the on-site visit? | □Yes□No If yes, please indicate their tasks: |
|  |
|  |
| Are any workers employed by subcontractors? | □Yes□No  |
| Have you identified any use of forced labour (e.g.: not permitting employees to change jobs) | □Yes□No  |
| Do miners live on the premises of the mine (e.g.: in a dormitory)? | □Yes□No  |
| How do you assess the quality of the camp? | □ Unacceptable□ Basic□ Comfortable |
| Have you seen any evidence of pressure, threats, bad or degrading treatment, etc. of employees, including sexual violence? | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Are the employees represented by a syndicate or equivalent body? | □Yes□No  |
| Have the employees been on strike during the past 12 months? | □ Yes□ NoIf yes, please explain why: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Other comments: |  |

|  |
| --- |
| **Health & Safety**  |
| Did you see any visible emergency plan? | □Yes □No |
| Did you see any first aid equipment? | □Yes □No |
| Does the workplace environment look secure? | □Yes □No |
| Is personal protective equipment (PPE) available for employees and on-site contractors? (e.g. head protection, safety footwear, protective clothing, face mask, etc.) | □Yes □No |
| Does the PPE look appropriate and is it properly used and worn by all personnel? | □Yes □No |
| Does the mine provide safety training to visitors? | □Yes □No |
| Does the mine use the accident rate as key performance indicator? |  |
| What is the mine safety track record? |  |
| Are there appropriate procedures to train security personnel | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Are there appropriate procedures to screen security personnel during the hiring process | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Other comments: |  |

|  |
| --- |
| **Pt/Pd extraction and processing method**  |
| Please describe the mining site (open pit, underground, etc.) |  |
| Please describe the extraction techniques. |  |
| Please describe the mining equipment (e.g. compressor, excavator, jack hammer, water pumps). |  |
| Is there any routine maintenance programme for mining equipment, and are maintenance records kept? | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Please describe the processing techniques, including chemical products used. |  |
| Please describe the method/process to avoid negative impact on the environment (e.g.: adequate tailing treatment, system to avoid pollution emission, etc). |  |
| What type of material will be sent to us for refining? |  |
| Is the infrastructure and/or the equipment set up proportionate to the production figures? | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Other comments: |  |

|  |
| --- |
| **Artisanal mining next to the mine site**  |
| Have you identified any artisanal miners next to the mine site? | □Yes □No |
| If Yes estimate the number of ASM miners on the concessions? |  |
| Can these ASM miners be considered Legitimate ASM? | □Yes □No |
| How does the mine handle artisanal miners next to the mine site? |  |
| Have there been any instances of conflict or tension? If yes please describe. | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Does the mine source from artisanal miners on its concession? | □Yes □No |
| Does the mine source ore, concentrate or doré from mines outside its concession? | □Yes □No |
| Other comments: |  |

|  |
| --- |
| **Community** |
| Is the mine positively affecting the surrounding communities? | □Yes □No |
| Is the mine negatively affecting the surrounding communities (health and safety, access rights)? | □Yes □No |
| Is the community facing issues that would impact our reputation (e.g. organized crime, prostitution, alcoholism, abuse of fragile community members, children schooling) | □Yes □No |
| Have there been demonstrations or social unrest in relation with the mine? If so, how was it handled by the mine and the authorities? | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

|  |
| --- |
| **Conflict area and security**  |
| Is the mine located in a conflict area? | □Yes □No |
| Have you gone through any military/police checkpoint along the road from the mining site to the airport? | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Are there any armed groups stationed on/near the mine site? | □Yes □No |
| If yes:Is it state armed groups?□ Yes □ NoIs it Non state armed groups?□ Yes □ NoIs it public or private security forces?□ Yes □ No |
| Please describe the general site security infrastructure (CCTV, perimeter fence, controlled access etc.) |  |
| Please describe the precious metal storage security infrastructure and processes. |  |
| Please describe storage facility and security of hazardous chemicals. |  |
| How do you assess the security infrastructure? | □ Adequate□ InadequateComments \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Have you identified any indication of illegal taxation or extortion of money across the whole supply chain? | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Please describe the environment relating to tax/fees/royalties paid to government (taxes on the extraction, trade, transport, and export of Pt/Pd). |  |
| Other comments: |  |

|  |
| --- |
| **Transportation**  |
| Please describe transportation method from mine site to export location. |  |
| Other comments: |  |

|  |
| --- |
| **Relationship Manager assessment**  |
| Where appropriate, have you engaged with the counterparty to improve its responsible practices? | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Overall assessment with positive and improvement points: |  |

Date:

Print name:

Signature:

**ANNEX Д**

**SITE VISIT FORM – RECYCLED MATERIAL**

Visited by (Name of Representative): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date of the visit: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Purpose** To standardise the on-site visit report documentation

|  |
| --- |
| **Customer**  |
| Name: |  |
| Registered address: |  |
| Address visited:(if different from the registered address) |  |
| Type of operations taking place at the location visited |  |
| Who did you meet during your visit (name & title)? |  |
| Have there been any changes in the customer’s ownership since the last visit or KYC update? |  |

|  |
| --- |
| **Business activity**  |
| Description of the customer’s history (company background): |  |
| Description of the customer’s structure (e.g. part of a group, privately owned etc.): |  |
| Description of the customer’s business activity: |  |
| What are the customer’s main products? |  |
| Others: |  |
| **Inbound (purchase of goods to be refined)** |
| What type of material will be sent to us for refining? |  |
| Please list the countries (and amounts) where the customer sources the precious metals: |  |
| What is the profile of their precious metal suppliers? |  |
| How many suppliers (approximatively) do they work with/purchase from? |  |
| What was the customer’s supply / production during the past 12 months? |  |
| How many transactions (purchases) do they have per week or month? |  |

|  |
| --- |
| **Regulatory environment**  |
| Is the precious metal activity regulated in the country of operations (e.g. AML)? | □ Yes □ No If yes, type of regulation and supervision: |
| Is the company required to hold a license to conduct its business?If yes, please attach a copy of the license to this report. | □ Yes □ No If yes, type of license: |
| Is the customer legally required to have a license to import or export precious metal?If yes, please attach a copy of each license to this report. | □ Import□ Export |
| Other comments: |  |

|  |
| --- |
| **Due diligence procedure on its customers/suppliers**  |
| Does the customer perform due diligence on its precious metals suppliers and customers? | □ Yes□ No |
| What type of due diligence is performed on its precious metals suppliers and customers? Please describe the due diligence documents that are requested by the customer? |  |
| Do they monitor the transactions with their customers? | □ Yes□ No |
| Do they accept cash transactions? | □ Yes□ No |
| Do they have to report any suspicious transaction or any cash transaction to the authority? | □ Yes□ NoIf yes, please describe: |
| Did the employees you talked with understand AML and reputation risks? | □ Yes□ No□ N/A |
| Are records of AML training maintained? | □ Yes□ No□ N/A |
| Other comments: |  |

|  |
| --- |
| **Workers**  |
| How do you assess the quality of the offices and/or working conditions? | □ Unacceptable □ Basic □ ComfortablePleas describe: |
| How many people work in the company? In the entire group? |  |
| Have you identified any evidence of use of forced labour, pressure, threats, bad treatment, etc. of employees? | □ Yes□ No |
| Have you seen any evidence of children working during the visit? | □ Yes□ NoIf yes, please indicate their tasks: |
| Other comments: |  |

|  |
| --- |
| **Security**  |
| How do you assess the security infrastructure? | □ Adequate□ InadequatePleas describe |
| What is the situation with respect to security in the Country at the time of the visit? |  |

|  |
| --- |
| **Only for Refining and or Manufacturing installations**  |
| Please describe the operational site and equipment: |  |
| In case they have a refining facility, what is their monthly production/capacity? |  |
| Please describe the processing techniques, including chemical products used (if any): |  |
| Please describe the methods/processes used to avoid negative impacts on the environment (e.g.: environmental management systems, pollution and emission control, etc): |  |

|  |  |
| --- | --- |
| Did you see any visible emergency plan? | □ Yes□ No□ N/A |
| Did you see any first aid equipment? | □ Yes□ No□ N/A |
| Does the workplace environment look safe and well maintained? | □ Yes□ No□ N/A |
| Is Personal Protective Equipment (PPE) available for employees? | □ Yes□ No□ N/A |
| Does the PPE look appropriate and is it properly used and worn by all employees? | □ Yes□ No□ N/A |
| Other comments: |  |

|  |
| --- |
| **Relationship Assessment**  |
| Where appropriate, have you engaged with the counterparty to improve its responsible practices? | □Yes□NoComments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Other comments: |  |
| Overall assessment with positive and improvement points: |  |

Date:

Print name:

Signature:

**ANNEX E**

**RISK ASSESSMENT TABLE**

|  |  |
| --- | --- |
| Counterparty Verification Parameters | Availability Note |
| Yes | No | N/A |
| Name of counterparty (INN (Taxpayer Identification Number)) |  |  |  |
| Address of counterparty |  |  |  |
| Country of incorporation of counterparty |  |  |  |
| Availability of documents according to the list in clause 4.10 of the Policy: |  |  |  |
| * compulsory documents about the company
 |  |  |  |
| * compulsory documents about beneficiary owners
 |  |  |  |
| * additional information (including from independent information sources)
 |  |  |  |
| Availability of the counterparty file |  |  |  |
| Availability of AML/CFT questionnaire |  |  |  |
| Availability of the counterparty questionnaire |  |  |  |
| Availability of the extracting company questionnaire\* |  |  |  |
| Availability of visit report\* |  |  |  |
| Familiarization of ​counterparty with the Company's Policy |  |  |  |
| Availability of counterparty risks: |  |  |  |
| * geographical risk (counterparty or its suppliers are located in conflict-affected countries/areas and/or high-risk areas)
 |  |  |  |
| * financial risk (counterparty unreasonably using cash transactions)
 |  |  |  |
| * existence of unusual counterparty's transactions\*\*
 |  |  |  |
|  |  |  |  |

\* for high-risk counterparties

\*\* if there are relationship with the counterparty prior to verification

The risk assessment table completed by:

Designated Officer relations employee:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_, 20\_\_\_

(signature) (full name)

The risk level assigned to the counterparty: Low Medium High

(*please underline as applicable*)

The risk assessment table checked by:

Designated Officer

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_, 20\_\_\_

(signature) (full name)

The risk level assigned to the counterparty: Low Medium High

(*please underline as applicable*)

Transactions with the counterparty are allowed for the period of

(*for high-risk counterparties) \_\_\_\_\_\_\_\_\_\_\_\_\_*

Director General

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_, 20\_\_\_

(signature) (full name)