**LBMA RGG Questionnaire – Mined Gold**

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| 1. **COMPANY DETAILS**
 |
| 1. **Name**
 |  |
| 1. **Registered Address**
 |  |
| 1. **Business Address**
 |  |
| 1. **Phone Number**
 |  |
| 1. **Date of Incorporation**
 |  |
| 1. **Country of Incorporation**
 |  |
| 1. **Business Registration Number**
 |  |
| 1. **Tax Identification/Registration Number**
 |  |
| 1. **If listed, indicate name of stock exchange(s) and ticker**
 |  |
| 1. **Website**
 |  |
| 1. **External Financial Auditors Since Date**
 |  |
| 1. **How many direct and indirect subsidiaries does the company have?**

*Please provide a Group chart* |  |

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| 1. **BUSINESS ACTIVITY**
 |
| 1. **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) | [ ]  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
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 |
| 1. **Description of Core Business Activity**
 |  |
| 1. **In which country/ies do you currently refine your precious metals?**
 |  |

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| 1. **BENEFICIAL OWNERS**
 |
| **SHAREHOLDER(S) (MORE THAN 25%)** |
| **Percentage Holding (%)** | **Name Address** | **Country of Incorporation/****Nationality(ies)** | **Date of Incorporation/****Date of Birth** |
|  |  |  |  |  |
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|  |  |  |  |  |
| **ULTIMATE BENEFICIAL OWNER (MORE THAN 25% - INDIVIDUAL ONLY)** |
| **Percentage Holding (%)** | **Name Address** | **Nationality(ies)** | **Date of Birth** |
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| 1. **MANAGEMENT STRUCTURE**
 |
|  | **Names** | **Title** | **Nationality(ies)** | **Date of Birth** |
| 1. **Board of Directors**
 |  |  |  |  |
| 1. **Top Management**
 |  |  |  |  |

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| 1. **FINANCIAL INFORMATION**
 |
| **5.1 Financial statements details** |
|  | **Currency** | **Last Reporting Period** | **Previous Year** |
| 1. **Share Capital**
 |  |  |  |
| 1. **Total Shareholder’s Equity**
 |  |  |  |
| 1. **Total Balance Sheet**
 |  |  |  |
| 1. **Sales**
 |  |  |  |
| 1. **Net Income**
 |  |  |  |
| *Please provide copy of latest annual report* |

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| **5.2 Other Financial Information** |
| 1. **Source of mining operation funding**
 | [ ]  Own equity [ ]  Government entity, name(s):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_[ ]  Bank loan, name(s):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_[ ]  Other third party loan, name(s):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| 1. **What usual payment method does the Company use to pay its suppliers?**
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|  |  |
| --- | --- |
| Payment type | Percentage (%) |
| Bank transfers |  |
| Checks |  |
| Cash |  |

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| --- | --- | --- | --- |
| 1. **REGULATORY ENVIRONMENT**
 | **YES** | **NO** | **N/A** |
| 1. **Does your Company need to comply with detailed health and safety regulations in the country/province of operations?**
 |  |  |  |
| 1. **Does your Company need to comply with detailed environmental regulations in the country/province of operations?**
 |  |  |  |
| 1. **Is child labour regulated in mining activity in the country/province of operations?**
 |  |  |  |
| 1. **Are public security forces used on or around the mine site?**
 |  |  |  |

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| 1. **HUMAN RESOURCES**
 |
| 1. **Number of employees within the Company**
 |  |
| 1. **Number of employees within the Group**
 |  |

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| 1. **ORIGIN OF PHYSICAL PRECIOUS METALS, CAPACITY AND MINING PRACTICES**
 |
| 1. **From how many mining site(s) is the gold extracted?**
 |  |
| 1. **Name of the mining site(s):**
 |  |
| 1. **Where exactly is the mining site(s) located (country, province, closest city, GPS coordinate)?**
 |  |
| 1. **In which perimeter (km) around the centre of operation/processing plant is the mining site(s) located?**
 |  |
| 1. **Is the mining site(s) legally required to hold a mining license?**

*Please provide a copy/ies* | [ ]  Yes [ ]  NoDate of issue: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Expiry date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| 1. **What is the daily production of the mining site(s)?**
 |  |
| 1. **What are the estimated reserves of the mining sites(s)?**
 |  |
| 1. **How many people are working on the mining site(s)?**
 |  |
| 1. **What is the gold extraction method (mining equipment & methods)?**
 |  |
| 1. **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 |
| 1. **Are there comprehensive procedures and systems at the mining site to avoid negative impact to the environment by gold extraction (such as adequate tailing treatment, system to avoid pollution emission, etc)?**
 | [ ]  Yes, please describe:[ ]  No |
| 1. **Does the mining site engage with affected communities and support local community development?**
 | [ ]  Yes, please describe:[ ]  No |
| 1. **Is there a comprehensive procedure at the mining site to ensure prevention of child labour?**
 | [ ]  Yes, please describe:[ ]  No |
| 1. **Are there any armed groups stationed on/near the mine site?**

**If yes, please provide information as to the reason:** | [ ]  Yes [ ]  State Armed group[ ]  Non State Armed Group[ ]  Public or private security forces------------------------------------------------------------------------------------------------[ ]  No |
| 1. **Does the Mining Company employ professional security forces to control the mine site?**
 | [ ]  Yes [ ]  No |
| 1. **Has the Regulator responsible for mining operations carried out an on-site visit**
 | [ ]  Yes, date of last visit:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_[ ]  No |
| 1. **If no on-site visit has been performed yet (question 8p above), is there any visit planned?**
 | [ ]  Yes, date of planned visit:\_\_\_\_\_\_\_\_\_\_\_\_[ ]  No |

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| 1. **PROCESSING PLANT**
 |
| 1. **Where exactly is the gold processing plant(s) located (country, province, closest city, GPS coordinate)?**
 |  |
| 1. **How many people are working in the gold processing plant?**
 |  |
| 1. **Is the gold processing plant held by the mining company or is it outsourced to an external party?**
 | [ ]  Mining company processing plant[ ]  Gold processing outsourced to an external plant Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| 1. **If the Mining Company has its own processing plant, does it also source mined gold for processing from external parties?**
 | [ ]  Yes Name and location of mining sites:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_[ ]  No |
| 1. **What is the gold processing method (processing equipment & methods)?**
 |  |
| 1. **What chemical products are used during processing?**
 | [ ]  Mercury[ ]  Cyanide[ ]  Others, please specify:\_\_\_\_\_\_\_\_\_\_\_\_ |
| 1. **What is the capacity of the processing plant per day?**
 |  |
| 1. **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 |
| 1. **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 |
| 1. **Does the processing plant have comprehensive processes to avoid negative impact to the environment by gold processing (such as adequate tailing treatment, system to avoid pollution emission, etc)?**
 | [ ]  Yes, please describe:[ ]  No |
| 1. **Does the processing plant engage with affected communities and support local community development?**
 | [ ]  Yes, please describe[ ]  No |
| 1. **Does the processing plant have a comprehensive procedure to ensure prevention of child labour?**
 | [ ]  Yes, please describe[ ]  No |
| 1. **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 |
| 1. **Does the processing plant employ professional security forces to control the plant**
 | [ ]  Yes [ ]  No |

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| **MATERIALS** |
| 1. **What type of precious metals is the Company planning to send for refining?**

|  |  |  |
| --- | --- | --- |
| [ ]  Gold |  | [ ]  Others, please specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

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| 1. **What is the form of precious metals planned to be sent for refining?**

|  |  |
| --- | --- |
| [ ]  Gold concentrate | [ ]  Mining by-product |
| [ ]  Gold ore | [ ]  Others, please specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

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| **Transportation** |
| 1. **How is the ore transported from the mining sites to the processing plant?**

|  |
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| [ ]  By your company |
| [ ]  By a third party (external company), which company? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

 |
| 1. **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\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |  |

 |
| 1. **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: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  |  |  |  |

 |
| 1. **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 |

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| 1. **RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY**
 |
| 1. **Did your company establish a responsible supply chain of gold from conflict-affected and high risk areas policy which is consistent with the standards set forth in the model supply chain policy in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?** [**http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf**](http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf)
 | [ ]  Yes **– Please provide a copy**[ ]  No |
| 1. **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 |
| 1. **Does your company comply with any of the following industry initiatives:**

|  |  |
| --- | --- |
| [ ]  | RJC Chain of Custody Standard |
| [ ]  | RJC Code of Practices |
| [ ]  | WGC Conflict Free Gold Standard |
| [ ]  | Fair Trade Standard |
| [ ]  | Fair Mined Standard |
| [ ]  | Others, please specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*Please provide a copy of the certification* |

 | Additional comments: |
| 1. **What are the procedures in place to ensure that the precious metals purchased have not financed conflict?**
 |  |

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| 1. **ANTI MONEY LANDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)**
 |
| 1. **Is your company subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation?**
 | [ ]  Yes – Please fill in the Wolfsberg questionnaire attached[ ]  No |
| 1. **Name of the AML-CFT Law/Regulation**
 |  |
| 1. **Name of the Regulator**
 |  |
| 1. **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 |

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| 1. **BRIBERY POLICY**
 |
| 1. **Does your Company have a bribery policy in place?**
 | [ ]  Yes **– Please provide a copy**[ ]  No |
| 1. **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** |
| Does the Corporate have a risk-based assessment of its customer base and their transactions? |  |  |
| 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 travellers 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):

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_