

## LBMA RGG Questionnaire – Mined Gold (LSM/MSM)

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 Number	
i. VAT Number	
j. If listed, indicate name of stock exchange(s) and ticker	
k. Website	
l. External Financial Auditors Since Date	
m. How many direct and indirect subsidiaries does the company have?  <i>Please provide a Group chart</i>	
n. Contact Person of the Company	
o. Has the Company, its ultimate beneficial owner(s) or member of top management been subject to legal proceedings or under investigation by national or international authorities (past 5 years/current)?  Please describe	

2. BUSINESS ACTIVITY													
a. Type of Business	<table style="width: 100%; border: none;"> <tr> <td style="width: 60%; border: none;">Large scale mine (&gt;100'000 oz/year)</td> <td style="width: 5%; border: none;"><input type="checkbox"/></td> <td style="width: 30%; border: none;">Precious Metals trader</td> <td style="width: 5%; border: none;"><input type="checkbox"/></td> </tr> <tr> <td style="border: none;">Medium scale mine (30-100'000 oz/year)</td> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none;">Others, please specify:</td> <td style="border: none;"><input type="checkbox"/></td> </tr> <tr> <td style="border: none;">Industrial Small scale mine (&lt;30'000 oz/year)</td> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none;">_____</td> <td style="border: none;"></td> </tr> </table>	Large scale mine (>100'000 oz/year)	<input type="checkbox"/>	Precious Metals trader	<input type="checkbox"/>	Medium scale mine (30-100'000 oz/year)	<input type="checkbox"/>	Others, please specify:	<input type="checkbox"/>	Industrial Small scale mine (<30'000 oz/year)	<input type="checkbox"/>	_____	
Large scale mine (>100'000 oz/year)	<input type="checkbox"/>	Precious Metals trader	<input type="checkbox"/>										
Medium scale mine (30-100'000 oz/year)	<input type="checkbox"/>	Others, please specify:	<input type="checkbox"/>										
Industrial Small scale mine (<30'000 oz/year)	<input type="checkbox"/>	_____											

<b>b. In which countries do you currently refine your precious metals?</b>	
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3. BENEFICIAL OWNERS				
SHAREHOLDERS(S) MORE THAN 10%				
Percentage Holding (%)	Name	Address	Country of Incorporation/ Nationality(ies)	Date of Incorporation/ Date of Birth

4. ULTIMATE BENEFICIAL OWNER					
SHAREHOLDERS(S) MORE THAN 10% - INDIVIDUAL ONLY					
Percentage Holding (%)	Name	Address	Country of Incorporation/ Nationality(ies)	Date of Incorporation/ Date of Birth	PEP Status (YES/NO)

5. FINANCIAL INFORMATION			
5.1 Financial statements details			
	Currency	Last Reporting Period	Previous Year
<b>a. Total Shareholder's Equity</b>			
<b>b. Turnover</b>			
<i>Please provide copy of latest annual report</i>			
5.2 Other Financial Information			
<b>c. Source of mining operation funding</b>	<input type="checkbox"/> Own equity <input type="checkbox"/> Government entity, name(s): _____ <input type="checkbox"/> Bank loan, name(s): _____		

	<input type="checkbox"/> Other third-party loan, name(s): _____								
<b>d. What usual payment method does the Company use to pay its suppliers?</b>	<table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Payment type</th> <th style="text-align: center;">Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Bank transfers</td> <td></td> </tr> <tr> <td>Checks</td> <td></td> </tr> <tr> <td>Cash</td> <td></td> </tr> </tbody> </table>	Payment type	Percentage (%)	Bank transfers		Checks		Cash	
Payment type	Percentage (%)								
Bank transfers									
Checks									
Cash									

6. REGULATORY FRAMEWORK	YES	NO	N/A
<b>a. Does your Company need to comply with the following regulations in the country/province of operations?</b> <ul style="list-style-type: none"> <li>Health and safety</li> <li>Environmental</li> <li>Labour</li> <li>Anti-bribery &amp; corruption</li> </ul>			
<b>b. Is child labour regulated in mining activity in the country/province of operations?</b>			
<b>c. Has your Company been fined or prosecuted for a breach to the following regulations in the country/province of operations during the last two years?</b> <ul style="list-style-type: none"> <li>Health and safety</li> <li>Environmental</li> <li>Labour</li> <li>Human rights</li> <li>Anti-bribery &amp; Corruption</li> <li>Taxes</li> </ul>			
<b>If yes, please describe how it has been mitigated</b>			
<b>d. Is the mining site(s)/processing plant legally required to hold a mining/operational license?</b> <i>Please provide a copy of the mining license</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Date of issue: _____ Expiry date: _____
<b>e. Is the mining site(s) legally required to hold an environmental license?</b> <i>Please provide a copy of the environmental license</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Date of issue: _____

	Expiry date: _____
f. Did the Regulator responsible for mining operations carry out an on-site visit	
g. If no on-site visit has yet been performed (question above), is there any visit planned?	<input type="checkbox"/> Yes, date of planned visit: _____ <input type="checkbox"/> No
h. Is your Company legally required to have a license to export precious metals?	<input type="checkbox"/> Yes – Please provide a copy Date of issue: _____ Expiry date: _____ <input type="checkbox"/> No <input type="checkbox"/> N/A

7. GOVERNMENT PAYMENTS	
a. Please describe the framework relating to tax/fees/royalties paid to government agencies and officials (taxes on the extraction, trade, transport and export of gold)	
b. Does your Company make financial and in-kind political contributions, whether directly or through an intermediary?  If yes, do you have a policy on that matter?	<input type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Yes <input type="checkbox"/> No
c. Do you apply the Extractive Industries Transparency Initiative (EITI) guidelines?	<input type="checkbox"/> Yes <input type="checkbox"/> No

8. HUMAN RESOURCES	
a. Number of employees within the Company	
b. Number of employees within the Group	
c. What practices have been put in place in your work force to: <ul style="list-style-type: none"> <li>• ensure inclusion (for e.g., gender, ethnicity, religion, etc)</li> <li>• prevent bullying, harassment and discrimination</li> <li>• ensure fair remuneration compared to relevant national and local benchmarks, norms and regulation</li> </ul>	

<ul style="list-style-type: none"> <li>• limit working hours</li> </ul> <p><i>Please provide relevant policies covering these topics</i></p>	
<p>a. Do you have a code of conduct on business integrity and ethical conduct?</p> <p><i>Please provide a copy</i></p>	
<p>b. Is freedom of association or collective bargaining allowed within the Company?</p>	
<p>c. Do you have a fair, accessible, effective and timely grievance mechanism in place for workers?</p> <p><i>Please describe</i></p>	
<p>d. Do you have employees under the age of 18 in the hazardous mining operations?</p>	
<p>e. Does your company</p> <ul style="list-style-type: none"> <li>• offer free access to all employees appropriate Personal Protective Equipment (PPE)</li> <li>• provide regular documented Health &amp; Safety training</li> <li>• offer to all employees health monitoring and screening to prevent workplace illness</li> </ul>	
<p>f. Does the Company use accident rate as a Key Performance Indicator?</p>	
<p>g. What is the past 12 months record on accident rate?</p>	

9. ORIGIN OF PHYSICAL PRECIOUS METALS, CAPACITY AND MINING PRACTICES	
a. From how many mining site(s) is the gold extracted?	
b. Name of the mining site(s):	
c. Where exactly is the mining site(s) located (country, province, closest city, GPS coordinates)?	
d. In which perimeter (km) around the centre of operation/processing plant is the mining site(s) located?	
e. What is the daily production of the mining site(s)?	
f. What are the estimated reserves of the mining sites(s)?	

g. Are you operating an open pit or an underground mine?	
h. What is the gold extraction method (mining equipment & methods)?	
i. Does the mine source from artisanal miners on its concession?	<input type="checkbox"/> Yes, please describe:  <input type="checkbox"/> No
j. Does the mine source ore or doré from mines outside its concession?	<input type="checkbox"/> Yes, Name and location of the mine: _____  <input type="checkbox"/> No

10. PROCESSING PLANT	
a. Where exactly is the gold processing plant(s) located (country, province, closest city, GPS coordinate)?	
b. Is the gold processing plant held by the mining company or is it outsourced to an external party?	<input type="checkbox"/> Mining company processing plant <input type="checkbox"/> Gold processing outsourced to an external plant  Name: _____
c. If the Mining Company has its own processing plant, does it also source mined gold for processing from external parties?	<input type="checkbox"/> Yes Name and location of mining sites: _____  <input type="checkbox"/> No
d. What is the gold processing method (processing equipment & methods)?	
e. What chemical products are used during processing?	<input type="checkbox"/> Mercury <input type="checkbox"/> Cyanide

	<input type="checkbox"/> Others, please specify: _____
f. Do you have practices in place to properly manage transportation, handling, storage and disposal of all hazardous materials?	
g. If cyanide is used, is the transportation, storage, use and disposal in line with the International Cyanide Management Code?	Yes <input type="checkbox"/> Plan to comply <input type="checkbox"/> No <input type="checkbox"/>
h. What is the capacity of the processing plant per day?	

11. MATERIALS	
a. What type of precious metals is the Company planning to send for refining?	
b. What is the form of precious metals planned to be sent for refining?	

12. COMMUNITY ENGAGEMENT	
a. Do you have Community Engagement Programs (incl. for vulnerable or marginalised groups)?  Do you have a person responsible for Community Relationship?	
b. Has there been any issue with the Community over the past 24 months?  If yes, please describe and provide information on how it has been mitigated	
c. What are the positive impacts on mining activities on the community (incl. women, children, Indigenous Peoples and other potentially vulnerable or marginalised groups)?	
i. Do you have a fair, accessible, effective and timely stakeholders' grievance mechanism in place?	<input type="checkbox"/> Yes, please describe:  <input type="checkbox"/> No

<p>j. Are you or have you had to resettle local communities?</p> <p>If yes, have you proceeded on the following basis:</p> <ul style="list-style-type: none"> <li>- consultation with affected communities</li> <li>- restoration of established livelihoods</li> <li>- provision of fair and timely compensation</li> </ul> <p>Please describe</p>	
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**13. SECURITY (MINING SITE / PROCESSING PLANT)**

<p>a. What are the security methods used at the mining site?</p>	<p>Internal Private security force</p> <p>Outsourced security force</p> <p>Public security force – if yes (use of public forces), Is there a Memorandum of Understanding in line with UN Voluntary Principles on Security and Human Rights in place?</p>
<p>b. Are the security guards armed?</p>	<p><input type="checkbox"/> Yes, please describe:</p> <p><input type="checkbox"/> No</p>
<p>c. What kind of training has the security personnel received?</p> <p>Is it in line with the UN Voluntary Principles on Security and Human Rights?</p>	
<p>d. Are there any armed groups stationed near the mine site (other than security provider)?</p> <p>If yes, please provide information as to the reason:</p>	<p><input type="checkbox"/> Yes</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> State Armed group</li> <li><input type="checkbox"/> Non-State Armed Group</li> <li><input type="checkbox"/> Public or private security forces</li> </ul> <p>_____</p> <p>_____</p> <p><input type="checkbox"/> No</p>

**14. TRANSPORTATION**



<p><b>a. How is the ore transported from the mining sites to the processing plant?</b></p> <p><input type="checkbox"/> By a third party (external company), which company? _____</p>	
<p><b>b. How is the doré transported from the processing plant to the export location?</b></p> <p><input type="checkbox"/> Truck    <input type="checkbox"/> Helicopter    <input type="checkbox"/> Armoured vehicle    <input type="checkbox"/> Fixed wing aircraft</p> <p><input type="checkbox"/> Others, please specify _____</p> <p><input type="checkbox"/> By a third party (external company), which company? _____</p> <p><input type="checkbox"/> Truck    <input type="checkbox"/> Helicopter    <input type="checkbox"/> Armoured vehicle    <input type="checkbox"/> Fixed wing aircraft</p> <p><input type="checkbox"/> Others, please specify _____</p>	
<p><b>c. How will the doré be transported from the export location to the refinery?</b></p> <p><input type="checkbox"/> Aircraft    <input type="checkbox"/> Boat    <input type="checkbox"/> Armoured vehicle    <input type="checkbox"/> Others, please specify: _____</p> <p><input type="checkbox"/> By a third party (external company), which company? _____</p> <p><input type="checkbox"/> Aircraft    <input type="checkbox"/> Boat    <input type="checkbox"/> Armoured vehicle    <input type="checkbox"/> Others, please specify: _____</p>	
<p><b>d. Is there any military/police checkpoint along the road from the mining site until the export location?</b></p>	<p><input type="checkbox"/> Yes</p> <p style="margin-left: 20px;">If yes, how many and for what purpose? _____ _____</p> <p><input type="checkbox"/> No</p>

15. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY / HUMAN RIGHT POLICY	
<p><b>a. Did your company establish a responsible supply chain of gold from conflict-affected and high-risk areas policy which is consistent with the standards set forth in the model supply chain policy in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?</b></p>	<p><input type="checkbox"/> Yes – Please provide a copy</p> <p><input type="checkbox"/> No</p>

<p><b>b. Does your company comply or plan to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?</b></p>	
<p><b>c. Does your company comply with any of the following industry initiatives?</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> RJC Chain of Custody Standard</li> <li><input type="checkbox"/> RJC Code of Practices</li> <li><input type="checkbox"/> WGC Conflict Free Gold Standard</li> <li><input type="checkbox"/> WGC Responsible Gold Mining Principles</li> <li><input type="checkbox"/> Fairtrade Standard</li> <li><input type="checkbox"/> Fairmined Standard</li> <li><input type="checkbox"/> International Council on Mining and Metals</li> <li><input type="checkbox"/> Extractive Sector Transparency Measures Act (ESTMA)</li> <li><input type="checkbox"/> Others, please specify: _____</li> </ul> <p><i>Please provide copy of certification</i></p>	<p>Additional comments:</p>
<p><b>d. Do you have a Human Right Policy in place?</b> <b>If yes, please provide a copy</b></p>	

16. ENVIRONMENT / CLIMATE CHANGE	
<p><b>a. At what stage are you in your greenhouse gas emissions (ex: carbon dioxide, methane, nitrous oxide, F-gases, etc) reduction journey?</b></p> <p><i>i.e.: Scope 1: Direct GHG emissions that occur from sources that are owned or controlled by the company, for example, emissions from combustion in owned or controlled boilers, furnaces, vehicles, etc.; emissions from chemical production in owned or controlled process equipment. Scope 2: Electricity indirect GHG emissions and accounts for GHG emissions from the generation of purchased electricity consumed by the company. Scope 3: Other indirect GHG emissions that are a consequence of the activities of the company but occur from sources not owned or controlled by the company. Some examples of scope 3 activities are extraction and production of purchased materials; transportation of purchased fuels; and use of sold products and services.</i></p> <p>If applicable, what are your current greenhouse gas emissions (for Scope 1 and 2 of the GHG Protocol)? Please report in metric tons of carbon dioxide equivalent (tCO<sub>2</sub>e)</p> <p>Have you set targets to reduce your GHG emission in Scope 1 and 2? If yes, please list each target. If no, do you plan on doing so in the next five years</p>	<input type="checkbox"/> Not started <input type="checkbox"/> Internal reflection <input type="checkbox"/> Evaluation of our current GHG emission (Scope 1 and 2) <input type="checkbox"/> Evaluation of your GHG emission (Scope 1, 2,3) <input type="checkbox"/> Target setting
<p><b>b. Is the mining site located in a water-stressed area?</b></p> <p><b>If yes, have you taken proportionate and practicable steps to manage efficiency of your water usage</b></p>	
<p><b>c. Does your company have a mine closure plan in place; including:</b></p> <ul style="list-style-type: none"> <li>• rehabilitation of land</li> <li>• preservation of water sources</li> <li>• prevention of land pollution</li> </ul>	
<p><b>d. Does your company have a biodiversity management plan to ensure that there is at least no net loss of critical habitat?</b></p>	
<p><b>e. Does your Company have an environmental incident plan (incl. tailings dam failure)?</b></p>	
<p><b>k. Are the mining site(s) located close to a World Heritage Site?</b></p>	
<p><b>l. Are the mining site(s) located in a Protected Area? (source: protected planet - <a href="https://www.iucn.org">https://www.iucn.org</a>)</b></p>	

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

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

19. Authorised Signatories – Please provide ID copies		
First Name:	Last Name:	Signature Specimen:
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	
First Name:	Last Name:	Signature Specimen:
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	
First Name:	Last Name:	Signature Specimen:
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	
First Name:	Last Name:	Signature Specimen:
Position:	Signatory Right: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	

**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.

	<b>Authorised signatory</b>	<b>Authorised signatory</b>
<b>Signature:</b>		
<b>Print Name:</b>		
<b>Title:</b>		
<b>Company Name</b>		
<b>Date and Location:</b>		

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

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

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

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

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

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