



Foreign Business Customer Know Your Customer Form (KYC)

Thank you for your interest in establishing a business relationship with IGR Metals Trading DMCC. We are excited to welcome you to experience our global precious Metals solutions for your financial needs. Before we on-board your business, we would like to gather certain information about you and your business in order to know our customers better as regulatory compliance requires from us to mitigate the financial crime risks and serve you better for all your Business needs.

The information we will be asking includes details about your business structure, its customers, shareholders, and controlling parties as well as countries that the business work with.

We have prepared This Know Your Customer (KYC) form facilitates smooth the on-boarding process for our customers.

Please go through each section In the form and fill out the necessary information as requested. We will take reasonable and appropriate measures to verify the key Information provided by you to reliable independent sources.

Please feel free to contact us if you have any questions.

IGR METALS TRADING DMCC QUESTIONNAIRE - MINED GOLD

1. COMPANY DETAILS	
a. Name	
b. Registered Address	
c. Email	
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 the name of the stock exchange(s)	
k. Website	
l. External Financial Auditors Since	
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 a 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	
Large scale mine (>100'000 oz/year)	
Medium-scale mine (30-100'000 oz/year)	
Industrial Small scale mine (<30'000 oz/year)	
Precious Metals trader	
Others, please specify:	

3. BENEFICIAL OWNERS				
Shareholders				
%	Name	Address	Nationality	Date of Birth

Ultimate Beneficial Owner <i>Attach Extra page if requires</i>					
Shareholder(s) more than 5% - individual Only					
%	Name	Address	Nationality	Date of Birth	PEP (Yes/No)

5. FINANCIAL INFORMATION - Please provide a copy of the latest annual report

5.1 Financial Statement Details	Currency	Last Reporting Period	Previous Year
a. Total Shareholder's Equity			
b. Turnover			

5.2 Other Financial Information
c. Source of mining operation funding

Own Equity
Government Entity
Bank loan, name:
Other third-party loan, name(s):

d. What usual payment method does the company use to pay its suppliers?

	payment	Percentage (%)
Bank Transfer		
Cheques		
Cash		

6. REGULATORY FRAMEWORK
YES NO N/A
a. Does your Company need to comply with the following regulations in the country/province of operations?

• Health and safety			
• Environmental			
• Labour			
• Anti-bribery & corruption			

b. Is child labor regulated in mining activity in the country/province of operations?

--	--	--

c. Has your Company been fined or prosecuted for a breach of the following regulations in the country/province of operations during the last two years?

• Health and safety			
• Environmental			
• Labour			
• Human rights			
• Anti-bribery and corruption			
• Taxes			

If yes, please describe how it has been mitigated

d. Is the mining site(s)/processing plant legally required to hold a mining/operational license? Please provide a copy of the mining license

Date of Issue:

Expiry Date

--	--	--

e. Is the mining site(s) legally required to hold an environmental license? Please provide a copy of the environmental license

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?

Date of planned visit:

--	--	--

h. Is your Company legally required to have a license to export precious metals?

Date of Issue:

Expiry Date:

--	--	--

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? <i>Share the Company Policy</i>	yes No
c. Do you apply the Extractive Industries Transparency Initiative (EITI) guidelines?	Yes No

8. HUMAN RESOURCES - Please provide relevant policies covering these topics

a. Number of employees within the Company	
b. Number of employees within the Group	
c. What practices have been put in place in your workforce to: <ul style="list-style-type: none"> • Ensure inclusion (e.g., gender, ethnicity, religion, etc.) prevent bullying, harassment, and discrimination • Ensure fair remuneration compared to relevant national and local benchmarks, norms and regulation • Limit working hours 	
d. Do you have a code of conduct on business integrity and ethical conduct?	
e. Is freedom of association or collective bargaining allowed within the Company?	
f. Do you have a fair, accessible, effective, and timely grievance mechanism in place for workers? <i>Please Describe</i>	
g. Do you have employees under the age of 18 in hazardous mining operations?	
h. Does your company <ul style="list-style-type: none"> • offer free access to all employees with appropriate Personal Protective Equipment (PPE) • provide regular documented Health & Safety training • offer to all employees health monitoring and screening to prevent workplace illness 	
i. Does the Company use accident rate as a Key Performance Indicator?	
j. What is the past 12 months' record on accident rate?	

9. ORIGIN OF PHYSICAL PRECIOUS METALS, CAPACITY AND MINING PRACTICES

a. From how many mining sites (s) is the gold extracted?	
b. Name of the mining site(s):	
c. In which perimeter (km) around the Centre of operation/processing plant is the mining site(s) located?	
d. What is the daily production of the mining site(s)?	
e. What are the estimated reserves of the mining sites(s)?	
f. Are you operating an open pit or an underground mine?	
g. What is the gold extraction method (mining equipment & methods)?	

h. Does the mine source from artisanal miners on its concession? <i>Please Describe</i>	Yes
	No
i. Does the mine source ore or doré from mines outside its concession?	Yes
	No

10. PROCESSING PLANT

a. Where exactly the gold processing plant is 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?	Mining company processing plant
	Gold processing outsourced to an external plant
c. If the Mining Company has its own processing plant, does it also source mined gold for processing from external parties?	Name:
	yes
	Name:
d. What is the gold processing method (processing equipment & methods)?	No:
e. What chemical products are used during processing?	Mercury
	Cyanide
	Others, <i>please specify:</i>
f. Do you have practices in place to properly manage transportation, handling, storage, and disposal of all hazardous materials? <i>Please share Reports/procedures</i>	
g. If cyanide is used, is the transportation, storage, use, and, disposal in line with the International Cyanide Management Code?	Yes
	Plant to comply
	No
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 marginalized groups)? Do you have a person responsible for Community Relationships?
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 of mining activities on the community (incl. women, children, Indigenous Peoples, and other potentially vulnerable or marginalized groups)?	
d. Do you have a fair, accessible, effective, and timely stakeholders' grievance mechanism in place?	Yes No
f. Are you or have you had to resettle in local communities? If yes, have you proceeded on the following basis:	
<ul style="list-style-type: none"> consultation with affected communities restoration of established livelihoods provision of fair and timely compensation <i>Please describe</i> 	

13. SECURITY (MINING SITE/PROCESSING PLANT)

a. What are the security methods used at the mining site?	Internal Private security force Outsourced security force
	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?
b. Are the security guards armed?	Yes, <i>Please describe</i>
	No
c. What kind of training has the security personnel received? Is it in line with the UN Voluntary Principles on Security and Human Rights?	
d. Are there any armed groups stationed near the mine site (other than security provider)? <i>If yes, please provide information as to the reason:</i>	yes
	State armed group
	Non-state armed group
	Public or private security forces
	no

14. TRANSPORTATION

a. How is the ore transported from the mining sites to the processing plant?	By a third party (external company), <i>Which company?</i>
b. How is the doré transported from the processing plant to the export location?	
Truck	
Helicopter	
Armored Vehicle	
Fixed wing craft	
Others, <i>please specify</i>	
By a third party (external company) which company?	
Truck	
Helicopter	
Armored vehicle	
Fixed wing craft	
Others, <i>please specify</i>	
c. How will the doré be transported from the export location to the refinery?	
Aircraft	
Boat	
Armored vehicle	
Fixed wing craft	
Others, <i>please specify</i>	

By a third party (external company) which company?		
<input type="checkbox"/>	Aircraft	
<input type="checkbox"/>	Boat	
<input type="checkbox"/>	Armored vehicle	
<input type="checkbox"/>	Others, <i>please specify</i>	
d. Is there any military/police checkpoint along the road from the mining site to the export location?	<input type="checkbox"/>	Yes
	<input type="checkbox"/>	If yes, how many and for what purpose?
	<input type="checkbox"/>	No

15. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY/HUMAN RIGHTS POLICY

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?	<input type="checkbox"/>	Yes – <i>Please provide a copy</i>
	<input type="checkbox"/>	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?	<input type="checkbox"/>	Yes
	<input type="checkbox"/>	No

c. Does your company comply with any of the following industry initiatives?

<input type="checkbox"/>	RJC Chain of Custody Standard
<input type="checkbox"/>	RJC Code of Practices
<input type="checkbox"/>	WGC Conflict-Free Gold Standard
<input type="checkbox"/>	WGC Responsible Gold Mining Principles
<input type="checkbox"/>	Fairtrade Standard
<input type="checkbox"/>	Fairmined Standard
<input type="checkbox"/>	International Council on Mining and Metals
<input type="checkbox"/>	Extractive Sector Transparency Measures Act (ESTMA)
<input type="checkbox"/>	Others, <i>please specify:</i> <i>Please provide a copy of the certification</i>

d. Do you have a Human Right Policy in place?

If yes, please provide a copy

16. ENVIRONMENT/CLIMATE CHANGE

a. At what stage are you in your greenhouse gas emissions (ex: carbon dioxide, methane, nitrous oxide, F-gases, etc.) reduction journey?

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.

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 (tCO2e) Have you set targets to reduce your GHG emission in Scope 1 and 2? If yes, please list each target. If not, do you plan on doing so in the next five years?

<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

b. Is the mining site located in a water-stressed area? If yes, have you taken proportionate and practicable steps to manage the efficiency of your water usage	
c. Does your company have a mine closure plan in place; including: <ul style="list-style-type: none"> • Rehabilitation of land • Preservation of water sources • Prevention of land pollution 	<i>Please describe:</i>
d. Does your Company have an environmental incident plan (incl. tailings dam failure)? <i>Please describe:</i>	
e. Are the mining site(s) located close to a World Heritage Site? <i>Please describe:</i>	
f. Are the mining site(s) located in a Protected Area? (source: protected planet - https://www.iucn.org) <i>Please describe:</i>	

17. ANTI MONEY LANDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)

a. Is your company subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation?	Yes – <i>Please provide a copy</i>
	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
	No

18. ANTI-BRIBERY POLICY

a. Does your Company have an anti-bribery policy in place?	Yes – <i>Please provide a copy</i>
	No
a. Has the company or the Senior Management ever been charged for violation of applicable anti-bribery laws or regulations?	

16. AUTHORIZED SIGNATORIES – Please Provide ID Copies

First Name		Last Name		Signature
Position		Signatory Right		
First Name		Last Name		Signature
Position		Signatory Right		
First Name		Last Name		Signature
Position		Signatory Right		
First Name		Last Name		Signature
Position		Signatory Right		

Signature:

*I hereby declare that the information given above is true and accurate as of the date of writing.
 I undertake to automatically inform IGR METALS TRADING DMCC of any material changes.*

	Authorized Signatory (1)	Authorized Signatory (2)
Signature		
Name (As per ID)		
Position		
Company Name		
Date & Location		

SUPPLIER UNDERTAKING FORM

1.1. The Seller hereby guarantees that the Goods are free and clear of any mortgage, Pledge, liens, claims, charges, and other encumbrances.

Further, the Seller warrants that the Goods do not originate from a Conflict Area nor has it been transported through a zone adjacent to a Conflict Area, and has been sourced in accordance with the sourcing practices as provided by OECD & LBMA. Further, the Seller warrants that the production of the Goods does not contribute to the impoverishment of the socio-economic levels of the local community and that it can prove that the production processes comply with the Relevant health, safety, and environmental laws. For the purposes of this agreement, "Conflict Area" shall mean areas, which are affected by war, any other conflict or sanctions deeming such areas to be high-risk where trade in any Goods sourced from such areas may intensify or perpetuate violent conflict and undermine development, Stabilization efforts, good governance, human rights, and the rule of law in such areas.

1.2. The Seller operates in accordance with the aims and management responsibilities of the London Bullion Market Association (LBMA) and Dubai Multi Commodities Centre (DMCC) upon responsible activity in the field of precious metals in order to prevent Anti-Money laundering, human rights violations as well as risk minimization associated With mining and circulation of precious metals.

1.3. The Seller declares not to conduct any transactions with courtiers/persons under sanctions, particularly with Venezuela / Myanmar / Iraq / Yemen / Uganda / Libya / Somalia / Democratic Congo Republic / Iran / Russia / Syria / Sudan / Cuba / North Korea and/or Crimea region.

1.4. The Buyer operates in accordance with the aims and management responsibilities of the London Bullion Market Association (LBMA) and Dubai Multi Commodities Centre (DMCC) upon responsible activity in the field of precious metals. The Buyer has developed and approved a policy on responsible gold and other precious metals supply guidance, which is aimed to prevent Anti-Money laundering, human rights violations as well as risk minimization associated with the mining and circulation of precious metals

1.5. The Seller confirms the aims of the Buyer's policy and expresses its content with this Policy

For and on behalf of the SUPPLIER

Name

Position

Signature

Company Stamp

WOLFSBERG ANTI-MONEY LAUNDERING QUESTIONNAIRE

Entity 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

1. General AML Policies, Practices, and Procedures	YES	NO
a. Is the AML compliance program approved by the company's board or a senior committee?		
b. Does the company have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML framework?		
c. Has the company developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?		
d. In addition to inspections by the government supervisors/regulators, does the company client have an internal audit function or another independent third party that assesses AML policies and practices on a regular basis?		

e.	Does the Company 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).		
f.	Does the Company have policies to reasonably ensure that it will not conduct transactions with or on behalf of shell banks through any of its accounts or products?		
g.	Does the Company have policies covering relationships with politically exposed persons (PEPs), their families, and close associates?		
h.	Does the Company have record retention procedures that comply with applicable law?		
i.	Does the Company require that its AML policies and practices be applied to all branches and subsidiaries of the company both in the home country and in locations outside of the home country?		
2. Risk Assessment		YES	NO
a.	Does the Company have a risk-based assessment of its customer base and its transactions?		
b.	Does the Company determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the company has reason to believe pose a heightened risk of illicit activities at or through the Company?		
3. Know your customer, Due diligence, and Enhanced due diligence		YES	NO
	accounts or conducts transactions?		
b.	Does the Company have a requirement to collect information regarding its customers' business activities?		
c.	Does the Company assess its FI customers' AML policies or practices?		
d.	Does the Company have a process to review and, where appropriate, update Customer information relating to high-risk client information?		
e.	Does the Company have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information?		
f.	Does the Company complete a risk-based assessment to understand the normal and expected transactions of its customers?		
4. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		YES	NO
a.	Does the Company have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?		
b.	Where cash transaction reporting is mandatory, does the Company have procedures to identify transactions structured to avoid such obligations?		
c.	Does the company screen customers and transactions against lists of persons, entities, or countries issued by government/competent authorities?		
d.	Does the Company have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?		
5. Transaction Monitoring		YES	NO
e.	Does the Company have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveler's checks, money orders, etc.?		
f.	Does the Company provide AML training to relevant employees that include identification and reporting of transactions that must be reported to the government authorities, examples of different forms of money laundering involving the Corporation's products and services, and internal policies to prevent money laundering?		
g.	Does the Company retain records of its training sessions including attendance records and relevant training materials used?		
h.	Does the Company communicate new AML-related laws or changes to existing AML-related policies or practices to relevant employees?		
i.	Does the Company employ third parties to carry out some of the functions of the Company?		
j.	If the answer to question 26 is yes, does the company provide AML training to relevant third parties that include: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities; • Examples of different forms of money laundering involving the company's products and services • Internal policies to prevent money laundering 		

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