



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 – RECYCLABLE 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	
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)? <i>Please describe:</i>	

2 BUSINESS ACTIVITY													
a. Type of Business	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; padding: 5px;">Bank</td> <td style="width: 33%; padding: 5px;">Jeweller</td> </tr> <tr> <td style="padding: 5px;">Precious Metals</td> <td style="padding: 5px;">Coins Dealer</td> </tr> <tr> <td style="padding: 5px;">Trader/Dealer</td> <td style="padding: 5px;">Mint</td> </tr> <tr> <td style="padding: 5px;">Other financial Intermediary</td> <td style="padding: 5px;">Scrap dealers/pawnshops</td> </tr> <tr> <td style="padding: 5px;">Industrial</td> <td style="padding: 5px;">Other, Please Specify</td> </tr> <tr> <td style="padding: 5px;">Wholesaler</td> <td style="padding: 5px;">Refinery</td> </tr> </table>	Bank	Jeweller	Precious Metals	Coins Dealer	Trader/Dealer	Mint	Other financial Intermediary	Scrap dealers/pawnshops	Industrial	Other, Please Specify	Wholesaler	Refinery
Bank	Jeweller												
Precious Metals	Coins Dealer												
Trader/Dealer	Mint												
Other financial Intermediary	Scrap dealers/pawnshops												
Industrial	Other, Please Specify												
Wholesaler	Refinery												
b. Description of core business activity													
c. Description of other business activities, if any													
d. Does the company hold a specific License to conduct its business (es)?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;">Yes - Please provide a copy</td> </tr> <tr> <td style="padding: 5px;">Date of Issue:</td> </tr> <tr> <td style="padding: 5px;">Expiry date:</td> </tr> <tr> <td style="padding: 5px;">No</td> </tr> <tr> <td style="padding: 5px;">N/A</td> </tr> </table>	Yes - Please provide a copy	Date of Issue:	Expiry date:	No	N/A							
Yes - Please provide a copy													
Date of Issue:													
Expiry date:													
No													
N/A													
e. Main Market													
f. Main Products													

3. BENEFICIAL OWNERS

Shareholders				
%	Name	Address	Nationality	Date of Birth

Ultimate Beneficial Owner Shareholder(s) more than 5% - individual Only					
%	Name	Address	Nationality	Date of Birth	PEP (Yes/No)

4. MANAGEMENT STRUCTURE

	Name	Title	Nationality	Date of Birth
a. Board of Directors				
b. Management				

5. FINANCIAL INFORMATION

	Currency	Last Reporting Period	Previous Year
a. Total Shareholder's equity			
b. Turnover			

6. HUMAN RESOURCES	
a. Number of employees within the company	
b. Number of employees within the group	

7. ORIGIN OF PHYSICAL PRECIOUS METALS			
a. From whom do you source your precious metal products?	Bank		Jeweller
	Precious Metals Trader		Coins Dealer
	Refinery		Mint
	Other financial Intermediary		Scrap dealers/pawnshops
	Industrial		Other, Please Specify
	Wholesaler		Individuals
b. List of all country(ies) of origin of precious metals delivered to you			
c. Do the precious metals supply by you originate from/transit to a conflict-affected and human rights abuse high-risk areas (CAHRA) as defined on the EU CAHRA list ?			
d. Is the Company legally required to have a license to import precious metals?	Yes – Provide a copy		
	Date of Issue:		
	Expiry Date:		
	No		
	N/A		

8. FACILITIES	YES	NO	N/A
a. Does the Company have refining facilities? Location (if different from the registered address):			
b. Does the Company have any melting facilities? Location (if different from the registered address):			
c. Does the Company produce its own jewelry?			

d. What are the types, forms, and percentages of precious metals sourced by the Company?	
Recycled Precious metals % _____	Primary material - Mined Precious metals % _____
LBMA GD Bullion	LSM – Large-scale mining
Rudimentary Bars	ASM – Artisanal small mining
Coins	Mining By-product
Industrial by Product	
Non-LBMA Good Delivery Bullion (Au=>995/AG=>9999)	
Jewellery	
Collected waste	
Broken Jewellery	
Others, please specify	

e. What type of precious metals is the company planning to send for refining?	
Gold/Silver	
Others, please specify	

f. What is the form of precious metals planned to be sent for refining?	
Unprocessed, recycled precious metals	Melted Recycled Precious Metals
LBMA GD Bullion	Rudimentary Bars (undefined dimension and fineness)
Coins	Industrial by-product
Own product waste	Grand-fathered product
Non-LBMA Good Delivery Bullion (Au=>995/AG=>9999)	Others, please specify
Jewellery	
Collected waste	
Broken jewellery	
Others, please specify	

g. If you source non-LBMA GD Bullion/bars (Au =>995 / AG=>9999):	YES	NO
Do you identify the refinery?		
Do you assess if the refinery has any red flags in its supply chain?		

h. If the refinery has red flags in its supply chain, do you request the refinery be audited for its compliance with the OECD due diligence guidance on responsible Supply chains from conflict and high-risk areas?	YES	NO
If yes, please provide a copy of the audit report		

9. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN	YES	NO	N/A
a. Did your institution 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/GuidanceEdition3.pdf			
b. 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/Regulations?			
LBMA Responsible Gold Guidance			
LBMA Responsible Silver Guidance			
RJC Code of Practice			
EU Conflict Minerals Regulation or equivalent			
RJC Chain of Custody Standard			
Responsible Minerals Initiative			
Others, please specify:			

10. ANTI MONEY LAUNDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)	YES	NO
a. Does the Company have refining facilities? Location (if different from the registered address):		
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?		

11. ANTI-BRIBERY POLICY	YES	NO
a. Does your Company have any anti-bribery policy in Place?		
b. Has the company or the Senior Management ever been charged for violation of applicable anti-bribery laws or Regulations?		

12. 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 contact details			

b. Does the Company have a person responsible for all responsible supply chain matters?			
c. Is the Company subject to an AML-CFT audit by an independent party or a governmental party? <i>Date of your last AML-CFT compliance audit:</i>			
d. Does the Company have AML-CFT training for the employees?			
e. Does the Company have responsible supply chain training for the employees?			
f. Does the Company delegate to third parties some of the due diligence functions to be carried Out? <i>If yes, what functions and to which company do you delegate?</i>			
g. How long does the Company keep its due diligence files (records)?			

13. PRECIOUS METALS SUPPLIERS DUE DILIGENCE

h. What type of information does the Company request from its precious metals suppliers type?					
Companies	YES	NO	Individuals	YES	NO
Company name			Complete Name		
Address			Address		
Date of incorporation			Date of birth		
Country of Incorporation			Nationality		
Business register or equivalent document			Copy of ID card or passport		
Beneficial Owners			Origin of Precious Metals		
Origin of Precious Metals			Tax conformity declaration		
Description of the main activity			Supplier profile (activity, wealth, etc.)		
financial information					
Tax conformity declaration					
Supply chain policy or procedures					

i. Does the Company have a risk-based assessment of its precious metals Suppliers (e.g. low, medium, or high risks) based on?	YES	NO	N/A
• <i>Location of the counterparty/supply chain</i>			
• <i>Profile of the counterparty</i>			
• <i>Supply chain risk (product)</i>			

j. Does the Company screen precious metals suppliers and transactions against lists of persons, Entities, or countries issued by government/competent authorities?			
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k. Does the Company perform enhanced due diligence for high-risk precious metals Suppliers/supply chains?			
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l. Does the Company assess its corporate precious metals suppliers' AML-CFT procedures and Practices?			
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13. TRANSACTION MONITORING

			YES	NO	N/A
Organization					
m. 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)?					
n. Does the Company have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments (e.g. traveler's cheques) or Third-party payments?					
o. Does the Company have to register all purchases and sales?					
p. To 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					

q. What usual payment method does the Company use to pay its precious metals suppliers?			
Payment Type	Percentage (%)		
Bank transfer			
Cheques			
Cash			
r. Does the Company have a procedure in place to prevent, detect and report suspicious transactions from its suppliers to the relevant Authority?			
s. How many suspect reports has the Company filled and handed over to the relevant Authority in the last two years?			
t. Does the Company have a maximum amount as per internal policy or regulatory Framework?	YES	NO	N/A
<ul style="list-style-type: none"> Amount allowed for cash payment? <i>If yes, how much?</i> 			
<ul style="list-style-type: none"> A amount of the deal per supplier in USD? <i>If yes, how much?</i> 			

14. TRANSACTION MONITORING ON PURCHASES FROM INDIVIDUALS ONLY			YES	NO	N/A
To be filled only by the company purchasing precious metals from individuals					
a. Does the Company maintain a transactions register?					
b. Does the Company have a specific procedure to identify unusual transactions? <i>If yes, please describe:</i>					
c. Is the Company able to verify that a person does not come several times to the counter/in different counters to sell each time a small amount but for a global material amount (smurfing)? <i>If yes, how?</i>					

15. TRANSPORTATION	
a. How is the recycled gold transported from your company to the refinery?	
By your own company	
By a third party (external company), which company?	
b. What is the transport method?	
Road	
Plane	
Boat	

16. AUTHORIZED SIGNATORIES – Please Provide ID Copies				
First Name		Last Name		<i>Signature</i>
Position		Signatory Right		
First Name		Last Name		<i>Signature</i>
Position		Signatory Right		
First Name		Last Name		<i>Signature</i>
Position		Signatory Right		
First Name		Last Name		<i>Signature</i>
Position		Signatory Right		
First Name		Last Name		<i>Signature</i>
Position		Signatory Right		
First Name		Last Name		<i>Signature</i>
Position		Signatory Right		

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

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		