

## LBMA DUE DILIGENCE CHECKLIST

### Recyclable Gold

| No  | Check when received      | KYC Documents  |
|---|--------------------------|--|
|   | <input type="checkbox"/> | “LBMA RGG Questionnaire – Recyclable Gold” or any equivalent assessment document<br><br><i>Please note that some of the requirements below are already included in the LBMA RGG Questionnaire</i>  |
|   | <input type="checkbox"/> | Identify the counterparty - [included in the LBMA RGG Questionnaire, section 1] <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Country of incorporation</li> </ul>  |
|   | <input type="checkbox"/> | Evidence of incorporation using reliable independent source documents, data or information, such as: <ul style="list-style-type: none"> <li>• Business register extract</li> <li>• Certificate of Incorporation</li> <li>• Certificate of good standing</li> <li>• Article of associations</li> <li>• Extract from reliable private database/from regulatory body database</li> </ul>  |
|   | <input type="checkbox"/> | Identify the beneficial owner(s) – [included in the LBMA RGG Questionnaire, section 3]   |
|   | <input type="checkbox"/> | Screening (through reliable database such as Worldcheck) on: <ul style="list-style-type: none"> <li>• Counterparty</li> <li>• Beneficial owner(s)</li> <li>• Others (based on risk assessment)</li> </ul>  |
|   | <input type="checkbox"/> | Financial details – [included in the LBMA RGG Questionnaire, section 5]  |
|   | <input type="checkbox"/> | Documentation supporting the purpose of the business relationship - [included in the LBMA RGG Questionnaire, section 8]  |
|   | <input type="checkbox"/> | Documentation supporting business details / Customer profile – [included in the LBMA RGG Questionnaire]  |
|   | <input type="checkbox"/> | Collecting and assessing Recycled Gold-supplying counterparty’s AML-CFT policy and practices, if applicable – [included in the LBMA RGG Questionnaire, section 10 & 12]  |
|   | <input type="checkbox"/> | Corroborative documentation based on the risk assessment such as for example: <ul style="list-style-type: none"> <li>• Authorised signatories’ IDs</li> <li>• Beneficial owners’ IDs</li> <li>• Internet research</li> <li>• Annual report</li> <li>• Group chart</li> <li>• References</li> <li>• Licenses</li> <li>• Certifications</li> <li>• Counterparty’s policies and procedures (AML-CFT policy, responsible supply chain policy, etc.)</li> <li>• Google map &amp; street view of given address</li> <li>• Counterparty’s office pictures</li> <li>• Regulatory environment assessment</li> <li>• Etc.</li> </ul> |
|   | <input type="checkbox"/> | Risk assessment from the Refiner’s perspective<br><br><i>Note that the LBMA Supply Chain Assessment Form can be used</i>   |
| <b>Additional requirements for high risk customers only</b> |                          |  |
|   | <input type="checkbox"/> | Report visit on on-site visit  |
|   | <input type="checkbox"/> | Screening on all companies located in conflict related areas in the chain from the gold supplying counterparties to the refinery   |