

## SAM PRECIOUS METALS SUPPLY CHAIN QUESTIONNAIRE

1. COMPANY DETAILS	
a. Name	
b. Registered Address	
c. Business Address	
d. Telephone Number	
e. Date of Incorporation	
f. Country of Incorporation	
g. Business Registration Number	
h. Tax Identification/Registration Number	
i. Website	
j. External Financial Auditors Since Date	
k. How many direct & indirect subsidiaries does the company have? (please provide a Group chart)	

2. BUSINESS ACTIVITY	
a. Type of Business	Precious Metals Trader/Dealer <input type="checkbox"/> Jeweller <input type="checkbox"/> Wholesaler <input type="checkbox"/> Scrap Dealer <input type="checkbox"/> Coins Dealer <input type="checkbox"/> Other Financial Intermediary <input type="checkbox"/> Others, please specify: <input type="checkbox"/> _____
b. Description of Core Business Activity	
c. Does the company hold a license to conduct its business (es)?	
d. Main Market	
e. Main Products	

3. MANAGEMENT STRUCTURE				
	Names	Title	Nationality	Date of Birth
a. Board of Directors				
b. Top Management				

4. FINANCIAL INFORMATION											
4.1 Financial Statements Details											
	Currency	Last Reporting Period	Previous Year								
a. Share Capital											
b. Total Shareholder's Equity											
c. Total Balance Sheet											
d. Sales											
e. Net Income											
<i>Please provide copy of latest Annual Report</i>											
4.2 OTHER FINANCIAL INFORMATION											
f. Source of operation funding	<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): _____										
g. What usual payment method does the Company use to pay its suppliers?	<table border="1"> <thead> <tr> <th>Payment Type</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Bank Transfers</td> <td></td> </tr> <tr> <td>Cheques</td> <td></td> </tr> <tr> <td>Cash</td> <td></td> </tr> </tbody> </table>			Payment Type	Percentage (%)	Bank Transfers		Cheques		Cash	
Payment Type	Percentage (%)										
Bank Transfers											
Cheques											
Cash											

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

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

7. ORIGIN OF PHYSICAL PRECIOUS METALS	
a. Profile of your precious metals suppliers (Individual/ Company)	
b. Country(ies) of origin of precious metals delivered to us?	
c. County(ies) of destination of precious metals delivered once refined?	
d. Is the Company legally required to have a license to import precious metals?	<input type="checkbox"/> Yes- please provide a copy <input type="checkbox"/> No <input type="checkbox"/> N/A
e. Is the Company legally required to have a license to export precious metals?	<input type="checkbox"/> Yes- please provide a copy <input type="checkbox"/> No <input type="checkbox"/> N/A

8. FACILITIES	YES	NO	N/A
a. Does the Company have any smelting or refining facilities?			
b. Does the Company have any manufacturing facilities?			
c. Does the company produce its own jewellery?			
d. What are the types, forms and percentage of precious metals sourced by the Company? <input type="checkbox"/> Recycled precious metals (%_____) <input type="checkbox"/> LBMA GD Bullion <input type="checkbox"/> Non LBMA Good Delivery Bullion (Au= >995 / Ag= >9999) <input type="checkbox"/> Rudimentary Bars <input type="checkbox"/> Jewellery <input type="checkbox"/> Broken Jewellery <input type="checkbox"/> Coins <input type="checkbox"/> Collected waste <input type="checkbox"/> Others, please specify: _____ <input type="checkbox"/> Primary material- mined precious metals (%_____) <input type="checkbox"/> Dore bars			

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

Gold  Others, please specify: \_\_\_\_\_

Silver

---

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

Unprocessed recycled precious metals

LBMA GD Bullion  Non LBMA Good Delivery Bullion (Au= >995 / Ag= >9999)

Coins  Jewellery  Broken Jewellery

Dore  Collected waste  Others, please specify: \_\_\_\_\_

Melted recycled precious metals

Rudimentary bars (undefined dimension and fineness)

**9. RESPONSIBLE PRECIOUS METALS SUPPLY CHAIN POLICY**

**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 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>

Yes- Please provide a copy

No

---

**b. Does your institution 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- Please provide a copy

Plans to comply

No

<p><b>c. Is the Company complying with any of the following industry initiatives:</b></p> <p><input type="checkbox"/> LBMA Responsible Gold Guidance  <input type="checkbox"/> LBMA Responsible Silver Guidance  <input type="checkbox"/> RJC Chain of Custody Standard  <input type="checkbox"/> WGC Conflict Free Gold Standard  <input type="checkbox"/> Conflict Free Smelter (CFS) Program  <input type="checkbox"/> Others, please specify: _____</p>	
<p><b>d. What are the procedures in place to ensure that the precious metals purchased have not financed conflict?</b></p>	

10. ANTI-MONEY LAUNDERING (AML)-COMBATING FINANCIAL TERRORISM (CFT)	
<p><b>a. Is your institution subject to Anti-Money Laundering /Combating Financial Terrorism Law/Regulation?</b></p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p><b>b. Has your institution established a conformity program that contains AML/CFT policies and procedures, according to internal &amp; international laws, rules and standards?</b></p>	<p><input type="checkbox"/> Yes- Please provide a copy  <input type="checkbox"/> No</p>

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

12. DATA PRIVACY PROTECTION	
<p><b>a. Does your Company have Data Protection Policy?</b></p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p><b>b. Does your Company have Data Protection Commissioner?</b></p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p><b>c. Does your Company have a certified data storage system or an information system?</b></p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>

13. PRECIOUS METALS SUPPLIERS DUE DILIGENCE QUESTIONNAIRE			YES	NO	N/A																																																						
<b>a. Does the Company have a person responsible (Compliance Officer) for all AML-CFT matters (Due Diligence, AML Policies, Internal Training)?</b> If Yes, please provide us with his/her name, phone number and email address.																																																											
<b>b. Is the Company subject to an AML-CFT audit by an independent party or a governmental party?</b> Date of your last AML-CFT compliance audit:																																																											
<b>c. How long does the Company keep its Due Diligence files (records)?</b>																																																											
<b>d. What is the typical profile of your precious metals suppliers?</b>																																																											
<input type="checkbox"/> Corporate (%_____)																																																											
<input type="checkbox"/> Individual persons (%_____)																																																											
<b>e. What type of information does the Company request from its precious metals suppliers?</b>																																																											
<table border="1"> <thead> <tr> <th>Companies</th> <th>YES</th> <th>NO</th> <th>INDIVIDUALS</th> <th>YES</th> <th>NO</th> </tr> </thead> <tbody> <tr> <td>Company Name</td> <td></td> <td></td> <td>Company Name</td> <td></td> <td></td> </tr> <tr> <td>Address</td> <td></td> <td></td> <td>Address</td> <td></td> <td></td> </tr> <tr> <td>Date of Incorporation</td> <td></td> <td></td> <td>Date of Incorporation</td> <td></td> <td></td> </tr> <tr> <td>Country of Incorporation</td> <td></td> <td></td> <td>Country of Incorporation</td> <td></td> <td></td> </tr> <tr> <td>Business register exact or equivalent document</td> <td></td> <td></td> <td>Business register exact or equivalent document</td> <td></td> <td></td> </tr> <tr> <td>Beneficial Owners</td> <td></td> <td></td> <td>Beneficial Owners</td> <td></td> <td></td> </tr> <tr> <td>Origin of Precious Metals</td> <td></td> <td></td> <td>Origin of Precious Metals</td> <td></td> <td></td> </tr> <tr> <td>Description of main activity and financial information</td> <td></td> <td></td> <td>Description of main activity and financial information</td> <td></td> <td></td> </tr> </tbody> </table>			Companies	YES	NO	INDIVIDUALS	YES	NO	Company Name			Company Name			Address			Address			Date of Incorporation			Date of Incorporation			Country of Incorporation			Country of Incorporation			Business register exact or equivalent document			Business register exact or equivalent document			Beneficial Owners			Beneficial Owners			Origin of Precious Metals			Origin of Precious Metals			Description of main activity and financial information			Description of main activity and financial information					
Companies	YES	NO	INDIVIDUALS	YES	NO																																																						
Company Name			Company Name																																																								
Address			Address																																																								
Date of Incorporation			Date of Incorporation																																																								
Country of Incorporation			Country of Incorporation																																																								
Business register exact or equivalent document			Business register exact or equivalent document																																																								
Beneficial Owners			Beneficial Owners																																																								
Origin of Precious Metals			Origin of Precious Metals																																																								
Description of main activity and financial information			Description of main activity and financial information																																																								
<b>f. Does the Company have risk-based assessment of its precious metals suppliers (e.g. Low, Medium, High)?</b>																																																											
<b>g. Does the Company screen precious metals suppliers transactions against lists of persons, entities or countries issued by government/competent authorities?</b>																																																											
<b>h. Does the Company perform enhanced Due Diligence for High Risk precious metals suppliers?</b>																																																											
<b>i. 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)?</b>																																																											

j. 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?											
k. Does the Company have to register all purchases and sales?											
l. What usual payment methods does the Company use to pay its precious metals suppliers?											
<table border="1"> <thead> <tr> <th>Payment Type</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Bank Transfers</td> <td></td> </tr> <tr> <td>Cheques</td> <td></td> </tr> <tr> <td>Cash</td> <td></td> </tr> </tbody> </table>				Payment Type	Percentage (%)	Bank Transfers		Cheques		Cash	
Payment Type	Percentage (%)										
Bank Transfers											
Cheques											
Cash											
m. Does the Company have a procedure in place to prevent, detect and report suspicious transactions from its suppliers to the relevant Authority?											
n. Does the Company have a maximum amount as per internal policy or regulatory framework:?											
<ul style="list-style-type: none"> <li>Amount allowed for cash payment? If yes, how much?</li> <li>Amount of deal per supplier in USD? If yes, how much?</li> </ul>											

Comments/ Additional information (please indicate which question the information is referring to)?

**SIGNATURE**

I hereby declare that the information given above is true and accurate as of the date of writing.

I undertake to automatically inform **SAM PRECIOUS METALS FZ LLC** of any material changes.

	Authorized Signatory	Authorized Signatory
Signature:		
Print Name:		
Title:		
Company Name:		
Date and Location:		

