



IGR GUIDELINES FOR ACCOUNT OPENING FOR RECYCLABLE GOLD

Suppliers who want to open an account with Istanbul Gold Refinery (IGR) must submit the following documents.
(if applicable / if existing) :

- ... All documents must be certified colored copies.
- ... All documents must be submitted in one of the following languages : English or Turkish.
- ... All documents must be updated.

DOCUMENTS REQUIRED

1-Company Registration Documents:	Articles of Association (notarized/apostilled)
	Certificate of Incorporation (notarized/apostilled)
	Certificate of Good Standing (notarized/apostilled)
	List of Authorized Signatures and Beneficial Owners (notarized/apostilled)
	Tax Registry (notarized/apostilled)
2- Valid Licence & Certification & Reports & Policy & Procedures	Licence to deal with Export and Import Precious Metals (notarized/apostilled)
	Financial & Independent Audit Repots
	Counterparty's Policies & Procedures (AML-CFT Policy, Responsible Gold Supply Chain Policy, Bribery Policy, Child Labor Policy etc.)
3- Owner or Shareholder's Identification	List of Beneficial owner or shareholders of the company.(att. Clear or Colored Passport and Visa Page Copies) (notarized/apostilled)
	List of directors of the company (board members).(att. Clear or Colored Passport and Visa Page Copies) (notarized/apostilled)
	Utility bill of the office (Phone,Electricity etc.)
4-Bank Account Details	Bank account numbers
	Bank reference letters
5-Duly Completed Forms	IGR Questionnaire Form 1
	IGR Compliance Agreement Form 2
	IGR Child Labor Form 3
	IGR Authorization Letter for Transactions Form 4
	IGR Bank Details Form 5
	IGR Certificate of Origin Form 6 (To be filled for each shipment)
6-Undertakings: Please read the entire documents and make sure you fully understand them before starting to apply for opening an account with Istanbul Gold Refinery (IGR)	OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High Risk Areas https://www.oecd-ilibrary.org/docserver/9789264252479-en.pdf?expires=1645543290&id=id&accname=guest&checksum=FA8E8D11CEC7BA6CA73D7982FBEB442D
	LBMA Responsible Gold Guidance https://cdn.lbma.org.uk/downloads/Publications/2021/Responsible-Gold-Guidance-Version-9-Final.pdf
	LBMA Responsible Silver Guidance https://cdn.lbma.org.uk/downloads/responsible-sourcing/20170824-Responsible-Silver-Sourcing-Master-SHD-V1.pdf
	DMCC Rules for Risk Based Due Diligence in the Gold and Precious Metals Supply chain https://www.dmcc.ae/application/files/3116/0083/7591/DMCC_Rules_RBD_GPM_-_v2_Final_002.pdf



IGR QUESTIONNAIRE RECYCLABLE GOLD

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	
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-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> Bank <input type="checkbox"/> Precious Metals <input type="checkbox"/> Trader/Dealer <input type="checkbox"/> Other Financial Intermediary <input type="checkbox"/> Industrial <input type="checkbox"/> </td> <td style="width: 50%; vertical-align: top;"> Jeweller <input type="checkbox"/> Scrap dealer/pawn shop <input type="checkbox"/> Coins dealer <input type="checkbox"/> Mint <input type="checkbox"/> Others, please specify <input type="checkbox"/> </td> </tr> </table>	Bank <input type="checkbox"/> Precious Metals <input type="checkbox"/> Trader/Dealer <input type="checkbox"/> Other Financial Intermediary <input type="checkbox"/> Industrial <input type="checkbox"/>	Jeweller <input type="checkbox"/> Scrap dealer/pawn shop <input type="checkbox"/> Coins dealer <input type="checkbox"/> Mint <input type="checkbox"/> Others, please specify <input type="checkbox"/>
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	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> Wholesaler <input type="checkbox"/> Refinery <input type="checkbox"/> </td> <td style="width: 50%; vertical-align: top;"> _____ _____ </td> </tr> </table>	Wholesaler <input type="checkbox"/> Refinery <input type="checkbox"/>	_____ _____
Wholesaler <input type="checkbox"/> Refinery <input type="checkbox"/>	_____ _____		
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)?	<input type="checkbox"/> Yes – Please provide a copy Date of issue: Expiry date: <input type="checkbox"/> No <input type="checkbox"/> N/A		
e. Main Market			
f. Main Products			



3. BENEFICIAL OWNERS				
SHAREHOLDERS(S) MORE THAN 10%				
Percentage Holding (%)	Name	Address	Country of Incorporation/ Nationality(ies)	Date of Incorporation/ Date of Birth
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)

4. MANAGEMENT STRUCTURE				
	Names	Title	Nationality(ies)	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			

Please provide copy of latest annual report

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	<input type="checkbox"/>	Jeweller	<input type="checkbox"/>
Precious Metals Trader/Dealer	<input type="checkbox"/>	Scrap dealer/pawn shop	<input type="checkbox"/>
Other Financial Intermediary	<input type="checkbox"/>	Coins dealer	<input type="checkbox"/>
Industrial	<input type="checkbox"/>	Mint	<input type="checkbox"/>
Wholesaler	<input type="checkbox"/>	Others, please specify	<input type="checkbox"/>
Refinery	<input type="checkbox"/>		
Individuals	<input type="checkbox"/>		
b. List 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 right abuse high risk areas (CAHRA) as defined on the EU CAHRA list ?			



<p>d. Is the Company legally required to have a licence to import precious metals?</p>	<p><input type="checkbox"/> Yes – Please provide a copy</p> <p>Date of issue:</p> <p>Expiry date:</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> N/A</p>
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8. FACILITIES	YES	NO	N/A												
<p>a. Does the Company have refining facilities?</p> <p>Location (if different as registered address):</p>															
<p>b. Does the Company have any melting facilities?</p> <p>Location (if different as registered address):</p>															
<p>c. Does the Company produce its own jewellery?</p>															
<p>d. What are the types, forms and percentage of precious metals sourced by the Company?</p> <p><input type="checkbox"/> Recycled precious metals (% _____)</p> <table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> LBMA GD Bullion</td> <td><input type="checkbox"/> Non LBMA Good Delivery Bullion (Au=>995/AG=>9999)</td> </tr> <tr> <td><input type="checkbox"/> Rudimentary Bars</td> <td><input type="checkbox"/> Jewellery <input type="checkbox"/> Broken jewellery</td> </tr> <tr> <td><input type="checkbox"/> Coins</td> <td><input type="checkbox"/> Collected waste <input type="checkbox"/> Others, please specify</td> </tr> <tr> <td><input type="checkbox"/> Industrial By-product</td> <td style="border-top: 1px solid black;"></td> </tr> </table> <p><input type="checkbox"/> Primary material - mined precious metals (% _____)</p> <table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> LSM</td> <td><input type="checkbox"/> Mining By-Product</td> </tr> <tr> <td><input type="checkbox"/> ASM</td> <td></td> </tr> </table>				<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"/> Industrial By-product		<input type="checkbox"/> LSM	<input type="checkbox"/> Mining By-Product	<input type="checkbox"/> ASM	
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<input type="checkbox"/> LSM	<input type="checkbox"/> Mining By-Product														
<input type="checkbox"/> ASM															
<p>e. What type of precious metals is the Company planning to send for refining?</p> <p><input type="checkbox"/> Gold/Silver <input type="checkbox"/> Others, please specify</p>															



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

Unprocessed, recycled precious metals

- | | |
|---|--|
| <input type="checkbox"/> LBMA GD Bullion | <input type="checkbox"/> Non LBMA Good Delivery Bullion (Au=>995/AG=>9999) |
| <input type="checkbox"/> Coins | <input type="checkbox"/> Jewellery |
| <input type="checkbox"/> Own production waste | <input type="checkbox"/> Collected waste |
| | <input type="checkbox"/> Broken jewellery |
| | <input type="checkbox"/> Others, please specify |

Melted recycled precious metals

- | | |
|--|---|
| <input type="checkbox"/> Melted recycled precious metals | |
| <input type="checkbox"/> Rudimentary Bars (undefined dimension and fineness) | <input type="checkbox"/> Others, please specify |

Industrial by-product

Grand-fathered product

g. If you source non LBMA GD bullion / bars (Au =>995 / AG=>9999):

... Do you identify the refinery?

- Yes
 No

... Do you assess if the refinery has any red flags in its supply chain?

- Yes
 No

h. If the refinery has red flags in its supply chain, do you request the refinery to 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 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 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/GuidanceEdition2.pdf>

- Yes
Please provide a copy
- No



<p>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?</p>	<input type="checkbox"/> Currently complies <input type="checkbox"/> Plans to comply <input type="checkbox"/> No
<p>c. Is the company complying with any of the following industry initiatives/Regulations?</p> <ul style="list-style-type: none"> <input type="checkbox"/> LBMA Responsible Gold Guidance <input type="checkbox"/> LBMA Responsible Silver Guidance <input type="checkbox"/> RJC Code of Practice <input type="checkbox"/> EU Conflict Minerals Regulation or equivalent <input type="checkbox"/> RJC Chain of Custody Standard <input type="checkbox"/> WGC Conflict Free Gold Standard <input type="checkbox"/> Responsible Minerals Initiative <input type="checkbox"/> Others, please specify: _____ 	<p>Additional comments:</p>

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

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



12. PRECIOUS METALS SUPPLIERS DUE DILIGENCE QUESTIONNAIRE	YES	NO	N/A
<i>Organisation</i>			
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 his/her name, phone number and e-mail address			
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? Date of your last AML-CFT compliance audit:			
d. Does the Company have an AML-CFT training for the employees?			
e. Does the Company have a 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? If yes, what functions and to which company do you delegate?			
g. How long does the Company keep its due diligence files (records)?			
<i>Precious Metals Suppliers Due Diligence</i>	YES	NO	N/A



h. What type of information does the Company request from its precious metals suppliers type?

Companies	YES	NO	Individuals	YES	NO
Company name	<input type="checkbox"/>	<input type="checkbox"/>	Name and first name	<input type="checkbox"/>	<input type="checkbox"/>
Address	<input type="checkbox"/>	<input type="checkbox"/>	Address	<input type="checkbox"/>	<input type="checkbox"/>
Date of Incorporation	<input type="checkbox"/>	<input type="checkbox"/>	Date of birth	<input type="checkbox"/>	<input type="checkbox"/>
Country of Incorporation	<input type="checkbox"/>	<input type="checkbox"/>	Nationality	<input type="checkbox"/>	<input type="checkbox"/>
Business register extract or equivalent document	<input type="checkbox"/>	<input type="checkbox"/>	Copy of ID card or passport	<input type="checkbox"/>	<input type="checkbox"/>
Beneficial Owners	<input type="checkbox"/>	<input type="checkbox"/>	Beneficial Owners	<input type="checkbox"/>	<input type="checkbox"/>
Origin of Precious Metals	<input type="checkbox"/>	<input type="checkbox"/>	Origin of Precious Metals	<input type="checkbox"/>	<input type="checkbox"/>
Description of main activity and financial information	<input type="checkbox"/>	<input type="checkbox"/>	Supplier profile (activity, wealth, etc.)	<input type="checkbox"/>	<input type="checkbox"/>
Tax conformity declaration	<input type="checkbox"/>	<input type="checkbox"/>	Tax conformity declaration	<input type="checkbox"/>	<input type="checkbox"/>
Supply chain policy or procedures	<input type="checkbox"/>	<input type="checkbox"/>			

	YES	NO	N/A
i. Does the Company have a risk-based assessment of its precious metals suppliers (e.g. low, medium or high risks) based on?			
... Location of the counterparty/supply chain	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
... Profile of the counterparty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
... Supply chain risk (product)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Does the Company screen precious metals suppliers and transactions against lists of persons, entities or countries issued by government/competent authorities?			
k. Does the Company perform enhanced due diligence for high risk precious metals suppliers/supply chains?			
l. Does the Company assess its corporate precious metals suppliers' AML-CFT procedures and practices?			
<i>Transaction monitoring</i>	YES	NO	N/A
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. traveller'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 transfers	
Checks	
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 the last two years?

	YES	NO	N/A
t. Does the Company have a maximum amount as per internal policy or regulatory framework? ... amount allowed for cash payment? If yes, how much? ... amount of deal per supplier in USD? If yes, how much?			
u. Where cash transaction reporting is mandatory, does the Company have procedures to identify transactions structured to avoid such obligations?			

14. TRANSACTION MONITORING ON PURCHASE FROM INDIVIDUALS ONLY - TO BE FILLED ONLY BY COMPANY PURCHASING PRECIOUS METALS FROM INDIVIDUALS	YES	NO	N/A
a. Does the Company maintain a transactions register?			
b. Does the Company have a specific procedure to identify unusual transactions? If yes, please describe:			
c. Is the Company able to verify that a person does not come several times in the counter/in different counters to sell each time a small amount but for a global material amount (smurfing)? If yes, how?			

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

Boat

Plane

16. 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	



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 *[The refinery]* of any material changes.

	Authorised Signatory	Authorised Signatory
Signature:		
Print Name:		
Title:		
Company Name		
Date and location:		



FORM:1

CUSTOMER COMPLIANCE AGREEMENT FORM
(Customer Due Diligence Agreement)

Company : _____

Address : _____

Represented by : _____

In order to preserve the viability and reputation of Turkey's leading Gold Refining Company Istanbul Gold Refinery (IGR). Established ethical principles and Due Diligence policy concerning customer relations.

Istanbul Gold Refinery (IGR). participates in cooperates with and enhances overall efforts to ensure that precious metals come from legitimate, ethical sources, and that they have not been associated with crime, armed conflict or human rights abuse. It is our policy to do business only with legitimate, law abiding customers, and to deny our products and services to all others.

Please read the following statement carefully to confirm the signature at the bottom of the page:

The source from where the gold is being exported to (Turkey) or its territories is free of identification of any affiliation of the company with the government, political parties, military, criminal networks or non-state armed groups, including in particular any reported instances of affiliation with non-state armed groups and/or public or private security forces. Also, the shipper whose name is on the shipping documents or in many cases the owner of the gold, confirms that the gold that is coming in from a source where any serious abuses (torture, cruel, inhuman and degrading treatment, forced or compulsory labor, the worst forms of child labor, gross human rights violations war crimes, or other serious violations of international humanitarian law, crimes against humanity or genocide) are not committed by any party involved in the supply chain of the goods on transportation routes nor at the points where gold is traded and/or processed.

You will be required to validate, and provide all the information mentioned in the Compliance Questionnaire form, whether the said party is the main source of gold or the subcontractor.

You will remain responsible and accountable for certification and external audit of supplied precious metals to Istanbul Gold Refinery (IGR).



FORM:2

Are you in compliance with Istanbul Gold Refinery (IGR). Compliance Regulations, its Istanbul Gold Refinery (IGR). Gold Supply Chain Due Diligence Policy or are you exempt?

(Please mark the correct answer below with an "x") :

_____ Yes, we are in compliance with Istanbul Gold Refinery (IGR). as it concerns our industry.

_____ No, we are not in compliance with Istanbul Gold Refinery (IGR). as it concerns our industry.

_____ Yes, we are exempt from Istanbul Gold Refinery (IGR) .as it concerns our industry.

Reason for exemption: _____

DECLARATION

We hereby confirm that we have read and understood *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High Risk Areas, LBMA Responsible Gold Guidance, DMCC Practical Guidance* and Due Diligence Procedures of the company.

We hereby declare that the particulars given herein are true, correct and complete to the best of our knowledge and belief, the documents submitted along with this application are genuine and we are no making this application for the purpose of contravention of any Istanbul Gold Refinery (IGR). Policies rules and regulations.

We hereby agree to provide any additional information / documentation that may be required by the Authorised Parties, in connection with this compliance and declaration.

We herewith declare to be the single owner of the funds, metals and /or valuables to act on his own account; should he be dealing on behalf of a third party being the beneficial owner of the funds, metals and/or valuables, he herewith commits to inform immediately Istanbul Gold Refinery (IGR).

Place and date _____

Name and Title _____

Stamp and Authorized Signature _____

Istanbul Gold Refinery (IGR).

7.No'lu Fabrika Kuyumcukent Sitesi 34197 Yenibosna/İstanbul /Turkey

P: +90 212 603 01 01 F: +90 212 603 01 10



FORM:3

CHILD LABOR AGREEMENT FORM

We are implementing a risk based supply chain due diligence considering the OECD due diligence guidance for responsible supply chain of minerals from conflict-affected and high risk areas in order to respect human rights regarding the worst form of child labor.

We ensure that we don't have any child labor under the age of 18. We are strictly enforcing penalties for breaches.

Our child labor policy is attached.

..../..../20..

Compliance officer
Sign & stamp



FORM:4

CUSTOMER AUTHORISATION LETTER FOR TRANSACTIONS

(to be printed on the company letterhead)

We _____(company name), hereby, confirm that the persons named below are authorized signatories for cash and metal settlements on the given IAR Customer Bank Account Details form.

Contact Person	Designation	Signing rights (jointly or individually)	Contact number, fax and e-mail	Signature

The present indications shall be valid unless otherwise advised by the company in writing.

Signed on behalf of _____(company stamp)

Authorised signatory

Name

Title

Date, Place



FORM:5

CUSTOMER BANK ACCOUNT DETAILS

~~These instructions are valid until changed or cancelled by us in writing, duly signed by authorised signatories~~

Cash settlements

To: Bank name:
Address: Country:

USD Account Number:
Account:
IBAN Number:
BIC:

TRY Account Number:
Account:
IBAN Number: BIC:

EUR Account Number:
Account:
IBAN Number:
BIC:

Precious Metal Settlements

Bank Name :
Address : Country :
Name of account holder :

Account Number :

Signed on behalf of _____ (company stamp)

Authorised signatory

Name

Title

Date,Place



FORM:6

Letter Headed

...../...../20..

CERTIFICATE OF ORIGIN

We hereby certify that the product (gold bars / silver bars / scrap jewelry)
contained herein consists of net grams, with a gold / silver purity grade of
.... %, which is equivalent to grams of pure gold / silver; and that these materials
originate from legitimate gold /silver mines / suppliers in the Republic of
.....

Stamp and Authorized Signature