

## IGR GUIDELINES FOR ACCOUNT OPENNING FOR MINED MATERIAL

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 R						
	Articles of Association (notarized/apostilled)					
1-Company	Certificate of Incorporation (notarized/apostilled)					
Registration Documents:	Certificate of Good Standing (notarized/apostilled)					
	List of Authorized Signatures and Beneficial Owners (notarized/apostilled)					
	Tax Registry (notarized/apostilled)					
	Licence to deal with Export and Import Precious Metals (notarized/apostilled)					
2- Valid Licence & Certification &	Financial & Independent Audit Repots					
Reports & Policy & Procedures	Counterparty's Policies & Procedures (AML-CFT Policy, Responsible Gold Supply Chain Policy, Bribery Policy, Child Labor Policy etc.)					
	List of Beneficial owner or shareholders of the company.(att. Clear or Colored Passport and Visa Page Copies)					
3- Owner or	(notarized/apostilled)					
Shareholder's Identification	List of directors of the company (board members).(att. Clear or Colored Passport and Visa Page Copies)					
identification	(notarized/apostilled)  Utility bill of the office (Phone,Electricity etc.)					
	Bank account numbers					
4-Bank Account	Bank reference letters					
Details	Bullit (blocker)					
	IGR Questionnaire Form 1					
5-Duly Completed	IGR Compliance Agreement Form 2					
Forms	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:	OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and					
Please read the	High Risk Areas https://www.oecd-ilibrary.org/docserver/9789264252479-					
entire documents and make sure you	en.pdf?expires=1645543290&id=id&accname=guest&checksum=FA8E8D11CEC7BA6CA73D7982FBEB442D					
fully understand them	LBMA Responsible Gold Guidance https://cdn.lbma.org.uk/downloads/Publications/2021/Responsible-Gold-					
before starting to	Guidance-Version-9-Final.pdf					
apply for opening an	LBMA Responsible Silver Guidance https://cdn.lbma.org.uk/downloads/responsible-sourcing/20170824-					
account with Istanbul Gold	Responsible-Silver-Sourcing-Master-SHD-V1.pdf  DMCC Rules for Risk Based Due Diligence in the Gold and Precious Metals Supply					
Refinery (IGR)						
	chain https://www.dmcc.ae/application/files/3116/0083/7591/DMCC_Rules_RBD_GPMv2Final_002.pdf					



## IGR RGG Questionnaire - Mined Gold (LSM/MSM) 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 I. External Financial Auditors Since m. How many direct and indirect subsidiaries does the company have? Please provide a Group chart 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 a. Type of Business Large scale mine $\ \square$ Precious Metals trader $\ \square$ (>100'000 oz/year) Medium scale mine $\square$ Others, please specify: $\square$ (30-100'000 oz/year) Industrial Small scale mine (<30'000 oz/year)



b. In which countries do you currently refine your precious metals?

3. BENEFICIAL OWNERS							
SHAREHOLDERS	(S) MORE THAN :	10%					
Percentage Holding (%)	Name	Address	Country of Incorporation/		Date of I	f Incorporation/ Date	
			Nationality(ies)				
4. ULTIMATI	E BENEFICIAL OW	/NER					
SHAREHOLDERS	(S) MORE THAN 1	10% - INDIVIDUAL	ONLY				
Percentage Holding (%)	Name	Address	Country of Incorporation/ Nationality(ies)	Date o Incorpo Date o	oration/	PEP Status (YES/NO)	

5. FINANCIAL INFORMATION						
5.1 Financial statements details						
Currency Last Reporting Period Previous Year						
a. Total Shareholder's Equity						
b. Turnover						
Please provide copy of latest annual report						



5.2 Other Financial Information						
c. Source of mining operation funding		Own equity				
		☐ Government entity, name(s):				
		Bar	nk loan, name(s):			
		Oth	er third-party loan, name(s):			
d. What usual payment						
method does the Company use to pay its			Payment type	Percentage (%)		
suppliers?			Bank transfers			
			Checks			
		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 labour regulated in mining activity in the country/province of operations?			
c. Has your Company been fined or prosecuted for a breach to the following regulations in the country/province of operations during the last two years?  • Health and safety  • Environmental  • Labour  • Human rights  • Anti-bribery & Corruption  • Taxes			
If yes, please describe how it has been mitigated			



	Please provide a copy of the mining license		issue: _		No	-
	the mining site(s) legally required to hold an environmental license?  Please provide a copy of the environmental license	□ Date of i			No	-
		Expiry d	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?	□ Yes,	date of	planned v	risit:	
h.	Is your Company legally required to have a license to export precious metals?		issue:		provide a cop	_

	7. GOVERNMENT PAYMENTS	
a.	Please describe the framework relating to tax/fees/royalt (taxes on the extraction, trade, transport and export of go	
b.	Does your Company make financial and in-kind political contributions, whether directly or through an intermediary?	□ Yes □ No
	If yes, do you have a policy on that matter?	□ Yes □ No



	. 0010		
C.	Do you apply the Extractive Industries Transparent Initiative (EITI) guidelines?	□ Yes	
	8. HUMAN RESOURCES		
a.	Number of employees within the Company		
b.	Number of employees within the Group		
C.	What practices have been put in place in your work force to:		
	<ul> <li>ensure inclusion (for e.g., gender, ethnicity, religion, etc)</li> </ul>		
	<ul> <li>prevent bullying, harassment and discrimination</li> </ul>		



e. Does your company
e. Does your company
<ul> <li>offer free access to all employees appropriate Personal Protective Equipment (PPE)</li> </ul>
provide regular documented Health & Safety training
offer to all employees health monitoring and screening to prevent workplace illness
. Does the Company use accident rate as a Key Performance Indicator?
g. What is the past 12 months record on accident rate?

	9. ORIGIN OF PHYSICAL PRECIOUS METALS, CAPACITY AND	D MININ	G PRACTICES
a.	From how many mining site(s) is the gold extracted?		
b.	Name of the mining site(s):		
c.	Where exactly is the mining site(s) located (country, province, closest city, GPS coordinates)?		
d.	In which perimeter (km) around the centre of operation/processing plant is the mining site(s) located?		
e.	What is the daily production of the mining site(s)?		
f.	What are the estimated reserves of the mining sites(s)?		
g. A	Are you operating an open pit or an underground mine?		
h. V	What is the gold extraction method (mining equipment & methods)?		
i.	Does the mine source from artisanal miners on its concession?		Yes, please describe:
			No



j.	Does the mine source ore or doré from mines outside its		Yes,
	concession?	Name a	and location of the mine:
			No
		I.	
	10. PROCESSING PLANT		
a.	When a second the delay are also also also the delay		
	Where exactly is the gold processing plant(s) located (country, province, closest city, GPS coordinate)?		
	(country, province, closest city, GF3 coordinate)?		
b.	Is the gold processing plant held by the mining company		Mining company processing plant
	or is it outsourced to an external party?		Gold processing outsourced to an
			external plant
			·
			Name:
	If the Mining Company has its own processing plant, does	_	Yes
C.	If the Mining Company has its own processing plant, does it also source mined gold for processing from external		Name and location of mining sites:
	it also source mined gold for processing from external parties?		Name and location of mining sites.
	parties.		
			No
	What is the gold processing method (processing		
d.	equipment & methods)?		
e.	What chemical products are used during processing?		Maraum
			Mercury
			Cyanide
			Others, please specify:
f.			
'-	Do you have practices in place to properly manage		
	transportation, handling, storage and disposal of all		
	hazardous materials?		
g.		Yes	
	If cyanide is used, is the transportation, storage, use and	Plan to	o comply $\ \square$
	disposal in line with the International Cyanide	No	_
	Management Code?		



h	h. What is the capacity of the processing plant per day?							
_								
	11. MATERIALS							
a.	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 s	sent for r	efining?					
•								
	12. COMMUNITY ENGAGEMENT							
a	Do you have Community Engagement Programs (incl. for vulnerable or marginalised groups)?							
	Do you have a person responsible for Community Relationship?							
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 on mining activities on the community (incl. women, children, Indigenous Peoples and other potentially vulnerable or marginalised groups)?							
i.	Do you have a fair, accessible, effective and timely stakeholders' grievance mechanism in place?		Yes, please describe:					
			No					



13. SECURITY (MINING SITE / PROCESSING PLAN	IT)
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, please describe:
	□ 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)?	□ Yes
If yes, please provide information as to the reason:	☐ State Armed group
	☐ Non-State Armed Group
	□ Public or private security forces
	□ No



es to the processing plant?
n company?
ng plant to the export location?
ehicle  Fixed wing aircraft
company? Armoured vehicle □ Fixed wing aircraft
ort location to the refinery?
Armoured vehicle ☐ Others, please specify:
ompany?
Armoured vehicle ☐ Others, please specify:
· · · · · · · · · · · · · · · · · · ·
Yes  If yes, how many and for what purpose?  ———————————————————————————————————

15. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY / HUMAN RIGHT 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	Yes	- Please provide a copy
High-Risk Areas?	No	



<ul> <li>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?     </li> </ul>	
c. Does your company comply with any of the following industry initiatives?	
□ RJC Chain of Custody Standard	
☐ RJC Code of Practices	
□ WGC Conflict Free Gold Standard	
☐ WGC Responsible Gold Mining Principles	
Fairtrade Standard	Additional comments:
Fairmined Standard	
International Council on Mining and Metals	
Extractive Sector Transparency Measures Act (ESTMA)	
Others, please specify:	
Please provide copy of certification	
d. Do you have a Human Right Policy in place?	
If yes, please provide a copy	



16. ENVIRONMENT / CLIMATE CHANGE	
<ul> <li>a. At what stage are you in your greenhouse gas emissions (ex: carbon dioxide, methane, nitrous oxide, F-gases, etc) reduction journey?</li> </ul>	
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.	Not started Internal reflection Evaluation of our current GHG
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)	emission (Scope 1 and 2)  Evaluation of your GHG
Have you set targets to reduce your GHG emission in Scope 1 and 2? If yes, please list each target. If no, do you plan on doing so in the next five years	emission (Scope 1, 2,3)  Target setting
b. Is the mining site located in a water-stressed area?	
If yes, have you taken proportionate and practicable steps to manage efficiency of your water usage	
<ul> <li>c. Does your company have a mine closure plan in place; including:</li> <li>rehabilitation of land</li> <li>preservation of water sources</li> <li>prevention of land pollution</li> </ul>	
d. Does your company have a biodiversity management plan to ensure that there is at least no net loss of critical habitat?	
e. Does your Company have an environmental incident plan (incl. tailings dam failure)?	



k. Are the mining site(s) located close to a World Heritag	ge Site?	
I. Are the mining site(s) located in a Protected Area? (so protected planet - https://www.iucn.org)	urce:	
17. ANTI MONEY LANDERING (AML) – COMBATING	FINANCIAL T	ERRORISM (CFT)
a. Is your company subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation?	□ - qu	Please fill in the Wolfsberg estionnaire attached
	□ 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,	□ Yes	- Please provide a copy
according to internal & international laws, rules and standards?	□ No	
18. ANTI-BRIBERY POLICY		
a. Does your Company have an anti-bribery policy in place?	Yes	- Please provide a copy
	□ No	
b. Has the company or the Senior Management	□ Yes	- Please provide details
ever been charged for violation of applicable anti-bribery laws or regulations?	□ No	



19. Authorised Signa	atories - Please provide ID co	pies	
First Name:	Last Name:		Signature Specimen:
Position:	Signatory Right:		
	□Joint	□Individual	
First Name:	Last Name:		Signature Specimen:
Position:	Signatory Right:		
	□Joint	□Individual	
First Name:	Last Name:		Signature Specimen:
Position:	Signatory Right:		
	□Joint	□Individual	
First Name:	Last Name:		Signature Specimen:
Position:	Signatory Right:		
	□Joint	□Individual	
SIGNATURE	he information given above is	true and accurat	to as of the data of writing

	Authorised signatory	Authorised signatory
Signature:		
Print Name:		
Title:		
Company Name		
Date and Location:		



# ATTACHMENT – TO BE FILLED IN ONLY FOR COMPANY SUBJECT TO AML-CFT REGULATION

Wolfsberg Anti-Money Laundering Questionnaire		
Corporate 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		
I. General AML Policies, Practices and Procedures:	Yes	No
<ol> <li>Is the AML compliance program approved by the Corporate's board or a senior committee?</li> </ol>		
Does the Corporate have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML framework?		
3. Has the Corporate developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?		
4. In addition to inspections by the government supervisors/regulators, does the corporate client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?		
5. Does the Corporate 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).		
Does the Corporate have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?		
7. Does the Corporate have policies covering relationships with politically exposed persons (PEP's), their family and close associates?		
8. Does the Corporate have record retention procedures that comply with applicable law?		
9. Does the Corporate require that its AML policies and practices be applied to all branches and subsidiaries of the corporate both in the home country and in locations outside of the home country?		

II. Risk Assessment	Yes	No



10. Does the Corporate have a risk-based assessment of its customerb ase and their transactions?		
11. Does the Corporate determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the Corporate has reason to believe pose a heightened risk of illicit activities at or through the Corporate?		
III. Know Your Customer, Due Diligence and Enhanced Due Diligence	Yes	No
12. Has the Corporate implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?		
13. Does the Corporate have a requirement to collect information regarding its customers' business activities?		
14. Does the Corporate assess its FI customers' AML policies or practices?		
15. Does the Corporate have a process to review and, where appropriate, update customer information relating to high risk client information?		
16. Does the Corporate have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information?		
17. Does the Corporate complete a risk-based assessment to understand the normal and expected transactions of its customers?		
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	Yes	No
18. Does the Corporate have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?		
19. Where cash transaction reporting is mandatory, does the Corporate have procedures to identify transactions structured to avoid such obligations?		
Does the corporate screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?		
21. Does the Corporate have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?		
V. Transaction Monitoring	Yes	No



22. Does the Corporate have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travellers checks, money orders, etc.

VI. AML Training	Yes	No
23. Does the Corporate provide AML training to relevant employees that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the Corporation's products and services and internal policies to prevent money laundering?		
24. Does the Corporate retain records of its training sessions including attendance records and relevant training materials used?		
25. Does the Corporate communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?		
26. Does the Corporate employ third parties to carry out some of the functions of the Corporate?		
27. If the answer to question 26 is yes, does the FI provide AMLt raining to relevant third parties that includes:		
<ul> <li>Identification and reporting of transactions that must be reported to government authorities;</li> </ul>		
<ul> <li>Examples of different forms of money laundering involving the Corporate's products and services</li> </ul>		
Internal policies to prevent money laundering		

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



### 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 com e 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, crimina 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, inhum an 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 agains 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 m etals to Istanbul Gold Refinery (IGR).



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		
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



### **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-effected and high risk areas in order to respect human rights regarding the worst form of child labor.

We ensure that we dont 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



## **CUSTOMER AUTHORISATION LETTER FOR TRANSACTIONS**

## (to be printed on the company letterhead)

	,			
We	` '		confirm that the person	
_	ories for cash and m	etal settlements on tr	he given İAR Custome	er Bank Account
Details form.				
Contact Person	Designation	Signing rights (jointly or individually)	Contact number,fax and e-mail	Signature
·			y the company in writir	ng.
Signed on behalf of		(company stam	np)	
Authorised signatory	<del></del>			
Name	<del></del>			
Title	<del></del>			

Date,Place



## **CUSTOMER BANK ACCOUNT DETAILS**

These instructions a	are valid until changed or cancelled by us in writing, duly signed by authorised signatories
Cash settlements	
То:	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 Settle	ements
Bank Name : Address : Country :	
Name of account hold	ler:
Account Number :	
Signed on behalf of _	(company stamp)
Authorised signatory	
Name	<del></del>
Title	

Date,Place



Letter I	Headed
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/	/20
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## **CERTIFICATE OF ORIGIN**

We hereby certify that the product ( gold bar	s / silver bars / scrap jewelry )
contained herein consists ofne	t grams, with a gold / silver purity grade of
%, which is equivalent to grams materials originate from legitimate gold /silve	. •

Stamp and Authorized Signature