ALEKS
METAL RAFİNERİ

AMR Questionnaire -Smelters/Refiners

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? *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	

2. BUSINESS ACTIVITY				
a. Type of Business	Bank	☐	Jeweller	☐
	Precious Metals	☐	Scrap dealer/pawn shop	☐
	Trader/Dealer	☐	Coins dealer	☐
	Other Financial Intermediary	☐	Mint	☐
	Industrial	☐	Others, please specify	☐

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	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)?	☐ Yes – Please provide a copy Date of issue: Expiry date: ☐ No ☐ 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				

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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	☐	Jeweller	☐
Precious Metals Trader/Dealer	☐	Scrap dealer/pawn shop	☐
Other Financial Intermediary	☐	Coins dealer	☐
Industrial	☐	Mint	☐
Wholesaler	☐	Others, please specify	☐
Refinery	☐		
Individuals	☐		

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]?	
d. Is the Company legally required to have a licence to import precious metals?	☐ Yes – Please 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 as registered address):			
b. Does the Company have any melting facilities? Location (if different as registered address):			
c. Does the Company produce its own jewellery?			
d. What are the types, forms and percentage of precious metals sourced by the Company?			

☐ Recycled precious metals (%____________)

☐ LBMA GD Bullion ☐ Non LBMA Good Delivery Bullion (Au=>995/AG=>9999)
☐ Rudimentary Bars ☐ Jewellery ☐ Broken jewellery
☐ Coins ☐ Collected waste ☐ Others, please specify
☐ Industrial By-product

____

☐ Primary material – mined precious metals (%__________)

☐ LSM
☐ ASM ☐ Mining By-Product

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

☐ Gold and/or Silver ☐ Others, please specify

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
☐ Own production waste ☐ Collected waste ☐ Others, please specify

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☐ Melted recycled precious metals

☐ Melted recycled precious metals
☐ Rudimentary Bars (undefined dimension and fineness) ☐ 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? If yes, please provide a copy of the audit report	☐ Yes ☐ No

9. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY	
a. Did your institution establish a responsible supply chain of gold and/or silver 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
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?	☐ 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 ☐ WGC Conflict Free Gold Standard ☐ Responsible Minerals Initiative ☐ Others, please specify: ______________________	Additional comments:

10. ANTI MONEY LANDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)	
a. Is your institution subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation	☐ Yes ☐ No

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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?	☐ Yes – Please provide a copy ☐ No

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

12. PRECIOUS METALS SUPPLIERS DUE DILIGENCE QUESTIONNAIRE	YES	NO	N/A
Organisation			
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)?			
Precious Metals Suppliers Due Diligence	YES	NO	N/A

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

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

	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	☐	☐	☐
• Profile of the counterparty	☐	☐	☐
• Supply chain risk (product)	☐	☐	☐
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?			
Transaction monitoring	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: ☐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	

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

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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:		

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