AMR 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	
l. External Financial Auditors Since Date	
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	Large scale mine (>100'000 oz/year)	☐	Precious Metals trader	☐
	Medium scale mine (30-100'000 oz/year)	☐	Others, please specify:	☐
	Industrial Small scale mine (<30'000 oz/year)	☐	______________________	
b. In which countries do you currently refine your precious metals?				

Aleks Metal Rafineri A.Ş.
İkitelli OSB Mh. Marmara Sk. P Blok, No:11 Küçükçekmece,
34490, İstanbul, Türkiye
www.aleksmetal.com

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

4. 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)

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): ______________________ ☐ Bank loan, name(s): ______________________		

	☐ Other third-party loan, name(s): ______________________
d. What usual payment method does the Company use to pay its suppliers?	<table><tr><th>Payment type</th><th>Percentage (%)</th></tr><tr><td>Bank transfers</td><td></td></tr><tr><td>Checks</td><td></td></tr><tr><td>Cash</td><td></td></tr></table>

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	
d. Is the mining site(s)/processing plant legally required to hold a mining/operational license? *Please provide a copy of the mining license*	☐ Yes ☐ No Date of issue: ______________________ Expiry date: ______________________
e. Is the mining site(s) legally required to hold an environmental license? *Please provide a copy of the environmental license*	☐ Yes ☐ No Date of issue: ______________________
	Expiry date: _________

Aleks Metal Rafineri A.Ş.
İkitelli OSB Mh. Marmara Sk. P Blok, No:11 Küçükçekmece,
34490, İstanbul, Türkiye
www.aleksmetal.com

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 visit: ____________ ☐ No
h. Is your Company legally required to have a license to export precious metals?	☐ Yes – Please provide a copy Date of issue: ____________________ Expiry date: _____________________ ☐ No ☐ N/A

7. GOVERNMENT PAYMENTS	
a. Please describe the framework relating to tax/fees/royalties paid to government agencies and officials (taxes on the extraction, trade, transport and export of gold)	
b. Does your Company make financial and in-kind political contributions, whether directly or through an intermediary? If yes, do you have a policy on that matter?	☐ Yes ☐ No ☐ Yes ☐ No
c. Do you apply the Extractive Industries Transparency Initiative (EITI) guidelines?	☐ Yes ☐ No

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: • ensure inclusion (for e.g., gender, ethnicity, religion, etc) • prevent bullying, harassment and discrimination • ensure fair remuneration compared to relevant national and local benchmarks, norms and regulation	

• limit working hours *Please provide relevant policies covering these topics*	
a. Do you have a code of conduct on business integrity and ethical conduct? *Please provide a copy*	
b. Is freedom of association or collective bargaining allowed within the Company?	
c. Do you have a fair, accessible, effective and timely grievance mechanism in place for workers? *Please describe*	
d. Do you have employees under the age of 18 in the hazardous mining operations?	
e. Does your company • offer free access to all employees appropriate Personal Protective Equipment (PPE) • provide regular documented Health & Safety training • offer to all employees health monitoring and screening to prevent workplace illness	
f. 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 MINING 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. Are you operating an open pit or an underground mine?	
h. 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 concession?	☐ Yes, Name and location of the mine: ________________________________ ☐ No

10. PROCESSING PLANT	
a. Where exactly is the gold processing plant(s) located (country, province, closest city, GPS coordinate)?	
b. Is the gold processing plant held by the mining company or is it outsourced to an external party?	☐ Mining company processing plant ☐ Gold processing outsourced to an external plant Name: _________________________
c. If the Mining Company has its own processing plant, does it also source mined gold for processing from external parties?	☐ Yes Name and location of mining sites: ______________________________ ☐ No
d. What is the gold processing method (processing equipment & methods)?	
e. What chemical products are used during processing?	☐ 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.	If cyanide is used, is the transportation, storage, use and disposal in line with the International Cyanide Management Code?	Yes ☐ Plan to comply ☐ No ☐
h.	What is the capacity of the processing plant per day?	

11. MATERIALS
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 sent for refining?

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

j. Are you or have you had to resettle local communities? If yes, have you proceeded on the following basis: - consultation with affected communities - restoration of established livelihoods - provision of fair and timely compensation Please describe	

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

Aleks Metal Rafineri A.Ş.
İkitelli OSB Mh. Marmara Sk. P Blok, No:11 Küçükçekmece,
34490, İstanbul, Türkiye
UYM.FR.06.E
www.aleksmetal.com

14. TRANSPORTATION

a. How is the ore transported from the mining sites to the processing plant?

☐ By a third party (external company), which company? ________________________

b. How is the doré transported from the processing plant to the export location?

☐ Truck ☐ Helicopter ☐ Armoured vehicle ☐ Fixed wing aircraft

☐ Others, please specify

____

☐ By a third party (external company), which company? ________________________

☐ Truck ☐ Helicopter ☐ Armoured vehicle ☐ Fixed wing aircraft

☐ Others, please specify

____

c. How will the doré be transported from the export location to the refinery?

☐ Aircraft ☐ Boat ☐ Armoured vehicle ☐ Others, please specify:

____

☐ By a third party (external company), which company? ________________________

☐ Aircraft ☐ Boat ☐ Armoured vehicle ☐ Others, please specify:

____

d. Is there any military/police checkpoint along the road from the mining site until the export location?	☐ Yes If yes, how many and for what purpose? ________________________________ ________________________________ ☐ No

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 High-Risk Areas?	☐ Yes – Please provide a copy ☐ No

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?	
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 ☐ Fairmined Standard ☐ International Council on Mining and Metals ☐ Extractive Sector Transparency Measures Act (ESTMA) ☐ Others, please specify: ______________________ *Please provide copy of certification*	Additional comments:
d. Do you have a Human Right Policy in place? If yes, please provide a copy	

16. ENVIRONMENT / CLIMATE CHANGE	
a. At what stage are you in your greenhouse gas emissions (ex: carbon dioxide, methane, nitrous oxide, F-gases, etc) reduction journey? *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.* 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) 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	☐ Not started ☐ Internal reflection ☐ Evaluation of our current GHG emission (Scope 1 and 2) ☐ Evaluation of your GHG 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	
c. Does your company have a mine closure plan in place; including: • rehabilitation of land • preservation of water sources • prevention of land pollution	
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 Heritage Site?	
l. Are the mining site(s) located in a Protected Area? (source: protected planet - https://www.iucn.org)	

17. ANTI MONEY LANDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)	
a. Is your company subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation?	☐ Yes – Please fill in the Wolfsberg questionnaire 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, according to internal & international laws, rules and standards?	☐ Yes – Please provide a copy ☐ 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 ever been charged for violation of applicable anti-bribery laws or regulations?	☐ Yes – Please provide details ☐ No

19. 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	

SIGNATURE

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

I/we undertake to automatically and promptly inform the refinery of any material changes.

	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 andadditional information is supplied at the end of the relevant section		
I. *General AML Policies, Practices and Procedures:*	Yes	No
1. Is the AML compliance program approved by the Corporate’s board or a senior committee?		
2. 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 asa bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group).		
6. Does the Corporate have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banksthrough 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 complywith 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 customerbase and their transactions?		
11. Does the Corporate determine the appropriate level of enhanceddue 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 eachcustomer 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 ofTransactions 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?		
20. 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 onlyoperates 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 andpotentially 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 bereported to government authorities, examples of different forms of money laundering involving the Corporation’s products andservices and internal policies to prevent money laundering?		
24. Does the Corporate retain records of its training sessions includingattendance 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 relevantemployees?		
26. Does the Corporate employ third parties to carry out some of thefunctions of the Corporate?		
27. If the answer to question 26 is yes, does the FI provide AMLtraining to relevant third parties that includes: • Identification and reporting of transactions that must be reported to government authorities; • Examples of different forms of money laundering involvingthe Corporate’s products and services • Internal policies to prevent money laundering		

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