

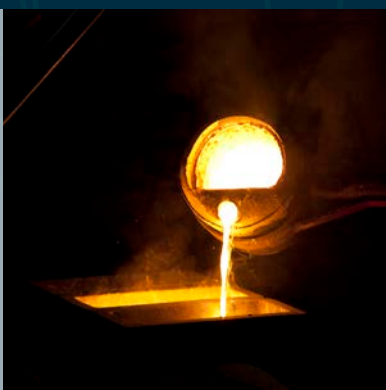


January 2023

AML-CFT COMPLIANCE



TRAWW





TRAWW

CORPORATE OVERVIEW

Corporate Infrastructure, Scope of Operations & Philosophy: TRAWW, Ltd.'s structure maximizes operational efficiencies as a privately-owned smelting company (SIC 3339) with its focus on precious metals. TRAWW is not a toll smelter; rather, it processes only ore it owns or controls. Further, TRAWW on request, intermediates precious metal as a service, to a select set of established sovereign and corporate counterparties, engaging only with well documented grandfather stocks in Europe, the Middle East, and Asia to acquire same for further refining and or hall marking of said grandfathered stocks as defined by the Organization for Economic Co-operation and Development ("OECD") as well as out of compliance London Bullion Market Association ("LBMA") bullion (hereinafter collectively referred to as ("Doré") on a worldwide basis in compliance with all applicable legal and regulatory regimens. TRAWW does not trade in physical nor securitized precious metals and as such maintains no trade desk nor capacity in this regard. TRAWW maintains refining, banking, transport, insurance, relationships worldwide. These relationships, informed by unrivaled infrastructure, capacity and experience allow TRAWW to provide counter-parties with professional goal-oriented compliant service.

TRAWW operates globally and takes pride in its continent-spanning reputation for integrity and honesty. It is essential that TRAWW employees, counter-parties and all those associated with TRAWW, protect that reputation. Money laundering, bribery and corruption are criminal offenses. In addition to the fines, penalties and reputational harm that TRAWW may suffer, such activities can lead to untoward human rights abuses and conflict financing. Employees, counterparties and all those associated with TRAWW involved in money laundering, bribery and corruption will be terminated. Third parties doing business with TRAWW are expected to comply with all applicable laws and adhere to our policies and contract provisions relating to the prevention of money laundering, bribery and corruption. As a leader in the precious metal smelting supply chain, TRAWW recognizes it is uniquely positioned to detect and prevent commercial activities that contribute to illegal activities. TRAWW works with its employees and counter parties to ensure they are aware of our policies and procedures and that the materials intermediated by TRAWW do not contribute to such illegal activities.

ANTI-MONEY LAUNDERING, BRIBERY AND CORRUPTION POLICY

Internal Controls, Procedures & Compliance Management:

TRAWW's integrated anti-money laundering ("AML"), know our customer ("KYC") and chain of custody ("COC") policies, procedures and internal controls are designed to ensure compliance with all applicable statutes, regulations and rules and are reviewed and updated on a regular basis. TRAWW employs on boarding procedures to insure its understanding of the nature, scope, motivation and provenance of those with whom it engages. TRAWW's Management regularly reviews TRAWW's policies, procedures and internal controls with professional international audit, taxation and legal counsel to ensure their ongoing efficacy. Further, TRAWW submits to external periodic independent audit of its compliance regimen. TRAWW's management is vested with responsibility for enforcement and as such a working knowledge of the OECD Chain of Custody Policies, LBMA and World Gold Council Protocols as well as familiarity with related statutory regimes including but not limited to: The foreign corrupt Practices Act; The Drug Trafficking Offenses Act 1986, The Criminal Act 1988, the Prevention of Terrorism (Temporary Provisions) Act 1989, The Criminal Justice (International Co-operation) Act 1990, The Criminal Justice Act 1993, and the Money Laundering Regulations 1993 as amended. Accordingly, TRAWW complies with law enforcement requests for information as well as all validly issued orders of courts of competent jurisdiction. Moreover, if TRAWW uncovers suspicious activity during our risk assessment and review, we will elevate that risk assessment in compliance with relevant statutory regimes.

Monitoring, Zero-tolerance, Training & Records:

TRAWW monitors the provenance of all precious metals transiting any phase of its intermediation services to ensure compliance. TRAWW is committed to a zero-tolerance approach to money laundering, bribery and corruption and will: (i) conduct all our business dealings and relationships in a fair, honest, and ethical manner; (ii) adhere to all applicable national and international laws and regulations relevant to countering money laundering, bribery and corruption; (iii) implement and enforce effective systems to counter the risk of money laundering, bribery and corruption; and (iv) prohibit the use of its businesses and services for money laundering, bribery, corruption or other illegal activities conducted through commercial transactions. If a potential or existing Counter-Party either refuses to provide the information requested, or appears to have intentionally provided misleading information, TRAWW will terminate engagement with that entity or individual TRAWW maintains AML, KYC and COC documentation regarding each counter-party and transaction. TRAWW maintains ongoing employee training under the leadership of a designated Compliance Officer TRAWW's training is based on its policies, procedures and internal controls as well as applicable statutes and regulations. TRAWW's training addresses: (i) identification of red flags; (ii) action upon risk identification, (iii) employees' roles in compliance efforts; (iv) record retention; and (v) disciplinary consequences of non compliance.





CHAIN OF CUSTODY POLICY

TRAWW participates in the worldwide effort to ensure that precious metals come from legitimate and ethical sources. Toward this end, TRAWW cooperates with both law enforcement and its supply chain industry transportation, insurance, banking and refining counter-parties as well as industry organizations such as the OECD, LBMA and World Gold Council.

To ensure that the precious metals have not been associated with criminal or terrorist activity, human rights abuse or armed conflict TRAWW implements its COC policy through a comprehensive set of management systems and procedures. These procedures implement the general standards of business conduct set forth above, as well as setting forth internal compliance standards that comport with applicable statutes and regulations. TRAWW's procedures govern not only our internal corporate conduct and culture; they also govern TRAWW's interaction with counter-parties and government agencies. These procedures penultimately find voice in rigorous contractual negotiations and clearly drafted agreements with all of TRAWW's counter-parties that both drive compliance and clearly set forth the wages of noncompliance.

Chain of Custody Documentation: TRAWW maintains internal legal counsel as well as specialized external legal professionals for international regulatory, corporate, tax, and litigation matters. TRAWW counter-parties engage TRAWW services and infrastructure exclusively through written agreements. It is through the integrated AML, KYC and COC procedures mandated by these agreements that TRAWW's compliance regimen is both enforced and documented.

Legal, Compliance & Logistical Coordination: All TRAWW purchase, sale, and transport agreements with counter-parties are subjected to both legal and compliance risk evaluation. Accordingly, TRAWW counter-party ore acquisition agreements routinely require and attach documents as required, including but not limited to: (i) mining licenses; (ii) mining inspection reports and compliance, certifications, (ii) export licenses; (iii) certifications of payment of taxes and duties; (iv) declarations of ethical standards, (v) principal and signatory passports, (vi) insurance coverage, (vii) LBMA refinery assay and or hallmark certifications and (viii) engagement of secure LBMA transport.



January 2023

AML-CFT POLICY



TRAWW



AML / CHAIN OF CUSTODY POLICY

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CONFIDENTIALITY NOTICE: This document and all information contained herein, inclusive of any amendment, appendix, or addendum hereto, is **Legally Privileged and Confidential**, and constitutes a *Trade Secret* within the meaning of the *Economic Espionage Act of 1996 [Codified at 18 U.S.C. (90), 18 U.S.C. §§ 1831, 1832, and 1839 (3)]*. Any electronic communication of this document is covered by the *Electronic Communications Privacy Act of 1986 [Codified at 18 U.S.C. §§ 1367, 2510-2521, 2701-2710, 3121-3126]*. Unauthorized review, use, disclosure, copy, or distribution is strictly prohibited.

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AML / CHAIN OF CUSTODY POLICY

AML/KYC PROCEDURES

ARTICLE I: AML & KYC Procedures

1.1. TRAWW AML Policy.

It is the policy of TRAWW, LTD. (hereinafter "TRAWW") to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities by complying with all applicable statutes and regulations in the jurisdictions in which we operate. Toward that end, TRAWW's AML procedures are based upon "risk-based" analysis taking into account the totality of the circumstance in addition to our review of specific compliance documentation. TRAWW's integrated procedures follow.

1.2. Money Laundering.

Money Laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the proceeds appear to have derived from legitimate origins or constitute legitimate assets. Generally, money laundering occurs in three stages. Cash first enters the financial system at the "placement" stage, where the cash generated from criminal activities is converted into monetary instruments, such as money orders or traveler's checks, or deposited into accounts at financial institutions. At the "layering" stage, the funds are transferred or moved into other accounts or other financial institutions to further separate the money from its criminal origin. At the "integration" stage, the funds are reintroduced into the economy and used to purchase legitimate assets or to fund other criminal activities or legitimate businesses.

1.3. Terrorist Financing.

Such financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal either the origin of the funds or their intended use, which could be for criminal purposes. Legitimate sources of funds are a key difference between terrorist financiers and traditional criminal organizations. In addition to charitable donations, legitimate sources include foreign government sponsors, business ownership and personal employment. Although the motivation differs between traditional money launderers and terrorist financiers, the actual methods used to fund terrorist operations can be the same as or similar to methods used by other criminals to launder funds. Funding for terrorist attacks does not always require large sums of money and the associated transactions may not be complex.

1.4. AML Policies, Procedures and Internal Controls.

TRAWW's AML policies, procedures and internal controls are designed to ensure compliance to all applicable statutes, regulations and rules and will be reviewed and updated on a regular basis to ensure their ongoing coordination with both changes in regulations and changes in our business model.

1.4.1. AML Compliance Person Designation and Duties. TRAWW is in the process of on-boarding its third-party designated Anti-Money Laundering Program Compliance officer (AML Compliance Officer), with full responsibility for TRAWW's AML program.

1.4.2. The AML Compliance Officer shall have a working knowledge of the OECD Chain of Custody Policies, LBMA and World Gold Council as well as familiarity with:

1.4.2.1. The Foreign Corrupt Practices Act;

1.4.2.2. The Drug Trafficking Offenses Act 1986,

- 1.4.2.3. The Criminal Act 1988,
- 1.4.2.4. The Prevention of Terrorism (Temporary Provisions) Act 1989,
- 1.4.2.5. The Criminal Justice (International Co-operation) Act 1990,
- 1.4.2.6. The Criminal Justice Act 1993, and the Money Laundering Regulations 1993.
- 1.4.3. The AML Compliance Officer shall be qualified by experience, knowledge and training and shall have direct access to TRAWW's Corporate, Taxation and International legal counsel.
- 1.4.4. The duties of the AML Compliance Officer will include:
 - 1.4.4.1. Monitoring TRAWW's compliance with AML obligations,
 - 1.4.4.2. Overseeing communication and training for employees,
 - 1.4.4.3. Participation in the update of TRAWW's policies.
- 1.4.5. The AML Compliance Officer will also ensure that TRAWW keeps and maintains all of the required AML records and will ensure that Suspicious Activity Reports (SAR-SFs) are filed when appropriate.
- 1.4.6. The AML Compliance Officer is vested with full responsibility and authority to enforce TRAWW's AML program.

1.5. Counter-Parties.

TRAWW defines the scope of the procedures set forth herein to include all counter-parties hereinafter ("Counter-Parties") to agreements to Sell or Acquire; or agreements to Render Services; and all related agent, mandate, facilitator and or finder payees related to the foregoing.

1.6. Counter-Parties Agreements.

TRAWW requires written agreements with and between itself and all Counter-Parties with whom it conducts business involving amounts in excess of ten thousand dollars (\$10,000.00) USD for any single transaction or as a combined total of multiple transactions. Moreover, the nature of TRAWW's business primarily involves the use of an independent, qualified institutional escrow agent to facilitate document versus payment (DVP) exchanges of title for physical metal; ergo, these cash-based transactions are subject to the strict bank compliance review of the underlying written agreements and of TRAWW and its counter-parties. In limited circumstances, TRAWW may engage in bank to bank posting of financial guarantees, such as a Bank Guaranty, subject to the respective bank's satisfaction in compliance with the underlying written agreements. Accordingly, TRAWW's Counter-Parties typically have sophisticated legal representation as well as sophisticated banking relationships.

1.7. Provision of AML Information.

TRAWW will respond to applicable national and international law enforcement agency requests concerning accounts and transactions by immediately searching our records to determine whether we have engaged in any transaction with each individual, entity or organization under investigation. Further, TRAWW will maintain records of all such information requests.

1.8. Coordination with Law Enforcement Agencies.

TRAWW will not disclose law enforcement agency requests concerning accounts and transactions, except in compliance with another subsequent law enforcement request or in compliance with any validly issued order of any court of competent jurisdiction. Moreover, unless otherwise directed, TRAWW will not treat the information request as continuing in nature, and accordingly TRAWW will not treat the requests as a government provided list of suspected criminal or terrorist activities. Unless otherwise directed, TRAWW will treat all such requests as neutral in our risk analysis.

1.9. Compliance with Courts.

We understand that the receipt of a grand jury or other subpoena concerning a customer does not in itself require that we file a Suspicious Activity Report. If we receive a grand jury or other subpoena, we will conduct a risk assessment of the customer subject to the subpoena as well as a review of the customer's account activity. If we uncover suspicious activity during our risk assessment and review, we will elevate that customer's risk assessment and file a report if appropriate and warranted. We understand that none of our officers, employees or agents may directly or indirectly disclose to the person who is the subject of the subpoena its existence, its contents or the information we used to

respond to it. To maintain the confidentiality of any grand jury subpoena we receive, we will process and maintain the subpoena by attaching any files as a compendium to the client file.

1.10. Supply Chain Partners.

TRAWW will share appropriate Due Diligence (hereinafter “DD”) and Know Your Client (hereinafter “KYC”) information with other supply chain parties or institutions regarding individuals, entities, organizations and countries for purposes of identifying and, where appropriate, reporting activities that we suspect may involve possible terrorist activity or money laundering. Further, TRAWW employs strict procedures both to ensure that only relevant information is shared and to protect the security and confidentiality of this information, for example, by segregating it from TRAWW’s other books and records. Moreover, TRAWW also employs procedures to ensure that any information received from another financial institution shall not be used for any purpose other than:

- 1.10.1. Identifying and, where appropriate, reporting suspected money laundering or terrorist activities; or,
- 1.10.2. Determining whether to engage in a transaction.

1.11. Corporate Affiliates.

TRAWW is a member of an affiliated group of companies as aforesaid. Ergo, TRAWW constituent companies will share files, clients, and information as required.

1.12. U.S. Treasury and OECD Compliance.

TRAWW and its affiliates utilize the USA based www.treasury.gov and the OECD websites for lists of countries that are part of economic sanctions and embargoes. TRAWW is aware that these sites are updated frequently. Accordingly, TRAWW will consult the site on a shipment-by-shipment basis. Further, TRAWW reviews existing accounts against the Treasury’s site list of current sanctions and embargoes during its annual client review. If TRAWW determines that a customer/ or source of product for a transaction is on a list or is engaging in transactions that are prohibited by the economic sanctions and embargoes administered and enforced, TRAWW will reject the transaction or cancel existing transactions that may have been initiated prior to change of status. Further, TRAWW will contact through legal counsel the relevant authority to ascertain what TRAWW’s further obligations are in the specific circumstance.

ARTICLE II: IDENTIFICATION PROGRAM

2.1. Counter-Parties Identification Program.

TRAWW has established, documented and maintained a written Customer Identification Program (“CIP”).

- 2.1.1. TRAWW will collect certain minimum customer identification information from each counter-party with whom we engage in a:
 - 2.1.1.1. Sale or Purchase Agreement; or,
 - 2.1.1.2. Joint Venture Agreement; or,
 - 2.1.1.3. Joint Interest Trust Agreement; or,
 - 2.1.1.4. Services Agreement; or,
 - 2.1.1.5. Facilitator’s Agreement; or,
 - 2.1.1.6. Exit Buyer Agreement.
- 2.1.2. Understanding that systems and forms vary by Country, the specified information items of TRAWW’s KYC or CIP procedure include, as applicable, but is not limited to:
 - 2.1.2.1. Company governmental registration certificates;
 - 2.1.2.2. Relevant company or individual licensing;
 - 2.1.2.3. Company or individual taxation numbers;
 - 2.1.2.4. Principal and/or mandate color passport or national identification card photocopy, including the same for each and every payee that includes name and date of birth;
 - 2.1.2.5. Verified contact information including physical address, email address and telephone;
 - 2.1.2.6. Relevant company or individual banking coordinates;
 - 2.1.2.7. Relevant company or individual mining license numbers;

- 2.1.2.8. Relevant company or individual export certifications;
- 2.1.2.9. Certifications of product origin (where applicable);
- 2.1.2.10. Certification of ownership free of lien, claim or encumbrance;
- 2.1.2.11. Certification of non-criminal source;
- 2.1.2.12. UN Clearance Certificates (where required);
- 2.1.2.13. Declarations of compliance with all applicable statutes including but not limited to those related to child labor, environmental sustainability, foreign corrupt practices, money laundering and terrorism.

2.2. Counter-Parties Who Provide False Information.

If a potential or existing client either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, TRAWW will not engage in business with that entity or individual.

2.3. Verification of Information:

Based upon TRAWW's risk analysis, and to the extent reasonable and practicable, TRAWW will ensure that we have a reasonable belief that we know the true identity of our customers by using risk-based procedures to verify and document the accuracy of the information gathered about our customers. We will analyze the information we obtain to determine whether the information is sufficient to form a reasonable belief that we know the true identity of our contractual counter-party.

TRAWW will verify counter-parties identity through documentary means, non-documentary means or both. We will use documents to verify customer identity when appropriate documents are available. In light of the increased instances of identity fraud, we will supplement the use of documentary evidence by using the non-documentary means described below whenever necessary. TRAWW may also use non-documentary means, if we are still uncertain about whether we know the true identity of the customer. In verifying the information, we will consider whether the identifying information that we receive, such as the counter-parties' name, street address, zip code, telephone number, date of birth allow us to determine that we have a reasonable belief that we know the true identity of the counter-party (e.g., whether the information is logical or contains inconsistencies).

TRAWW understands that we are not required to take steps to determine whether the document that the customer has provided to us for identity verification has been validly issued and that we may rely on a government-issued identification as verification of a counter-parties' identity. Nevertheless, TRAWW notes that if the document shows some obvious indicia of fraud, TRAWW will consider that factor in determining whether we can form a reasonable belief that we know the counter-parties' true identity.

Depending on the nature of the transaction and or requested transactions, TRAWW may refuse to complete a transaction before we have verified the information, or in some instances when we need more time, we may, pending verification, restrict the types of transactions or dollar amount of transactions. If TRAWW finds suspicious information that indicates possible money laundering, terrorist financing activity, or other suspicious activity; TRAWW will, after internal review, reject the transaction and so inform said counter-parties.

2.4. Lack of Verification:

When TRAWW cannot form a reasonable belief that we know the true identity of a Counter-Party; then, TRAWW will not engage in business with said counter-parties.

2.5. AML Recordkeeping & Archive:

TRAWW will document our verification, including all identifying information provided by a said counter-party, the methods used and results of verification, and the resolution of any discrepancies identified in the verification process. TRAWW will keep records containing a description of any document that we relied on to verify a said counter-parties' identity, noting the type of document, any identification number contained in the document, the place of issuance, and if any, the date of issuance and expiration date. To this end TRAWW will always require certified color photocopies of all identification including but not limited to:

- 2.5.1. Passports,
- 2.5.2. Drivers licenses,

2.5.3. Cedulas, and / or

2.5.4. Other forms of governmental identification.

TRAWW maintains a hard copy Compendium of all counter-party Agreements and related documentation cross-referenced by client and transaction reference code. Moreover, TRAWW maintains an electronic version of this Compendium both on and off site.

2.6. Comparison with Government-Provided Lists of Terrorists:

At such time as we receive notice that a government agency has issued a list of known or suspected terrorists and identified the list as a list for CIP purposes, we will, within a reasonable period of time after an account is opened (or earlier, if required by another applicable law or regulation) determine whether extant TRAWW Counter-Parties appear on any such list of known or suspected terrorists or terrorist organizations. In the event that a match is made; then, TRAWW will advise legal counsel which shall contact the related government agency as warranted in the circumstances. Moreover, TRAWW will continue to comply separately with any known rules prohibiting transactions with certain foreign countries or their nationals.

2.7. Notification to Counter-Parties:

We will provide notice to Counter-Parties that TRAWW is requesting information as a part of its AML/KYC program to verify their identities as required by applicable statutes. Moreover, TRAWW shall embed all identification documents into our agreements as Attachments, Exhibits, Addenda, or Amendments.

2.8. General Customer Due Diligence:

It is important to TRAWW's AML program to obtain sufficient information regarding all Counter-Parties to allow TRAWW to evaluate the risk presented by said counter-party and to detect and report suspicious activity. Accordingly, TRAWW conducts its internal review and if deemed necessary, TRAWW engages the services of third party investigative services to resolve conflicting or missing information.

2.9. Confidentiality.

TRAWW will maintain all Counter-Party supporting documentation confidential; absent an appropriate law enforcement inquiry or an order from any court of competent jurisdiction.

2.10. Emergency Notification to Law Enforcement:

In situations involving violations that require immediate attention, such as terrorist financing or ongoing money laundering schemes, TRAWW will immediately refer the matter to its legal counsel with directions to contact an appropriate law enforcement authority.

ARTICLE III: RED FLAG EVENTS

3.1. Red Flags:

Red flags that signal possible money laundering or terrorist financing include, but are not limited to:

- 3.1.1. Counter-Parties refusal to provide sufficient information.
- 3.1.2. Counter-Parties providing suspicious information.
- 3.1.3. Counter-Parties refusal to provide information about nature and purpose of business, prior banking relationships, anticipated account activity, officers and directors or business location.
- 3.1.4. Counter-Parties refusal to identify a legitimate source for funds or such information that is provided proves to be misleading or substantially incorrect.
- 3.1.5. Counter-Parties background is questionable or differs from expectations based on proposed transactions.
- 3.1.6. Counter-Parties with no commercial rational for using TRAWW's service.
- 3.1.7. Counter-Parties that go to lengths to avoid TRAWW's reporting and recordkeeping procedures.
- 3.1.8. Counter-Parties that attempt to persuade an employee not to file required reports or not to maintain required records.

- 3.1.9. Counter-Parties that structure transactions (deposits, withdrawals or purchase of monetary instruments) specifically to avoid reporting or recordkeeping requirements.
- 3.1.10. Counter-Parties that evidence unusual concern with TRAWW's compliance with government reporting requirements and or TRAWW's AML policies.

3.2. Suspicious Funds Transfer Activities:

Certain financial activity, of its nature, bears indicia of non-compliant financial activity. These include but are not limited to:

- 3.2.1. Wire transfers to or from high-risk geographic locations without an apparent business rational.
- 3.2.2. Wire activity or payments made using checks and or money orders, which are inconsistent with the business or history.
- 3.2.3. Wire activity that is unexplained, repetitive, and or unusually large or demonstrates an unusual pattern or has no apparent business purpose.
- 3.2.4. Activity inconsistent with business to be conducted.
- 3.2.5. Transactions patterns show a sudden change inconsistent with normal activities.
- 3.2.6. Attempts to act as an agent for an undisclosed principal.
- 3.2.7. Requested payments to a third-party without apparent connection to transaction.
- 3.2.8. Absence of concern regarding the cost of transactions or fees.
- 3.2.9. Law enforcement subpoenas.

3.3. Responding to Red Flags and Suspicious Activity:

When TRAWW detects any red flag, or other activity that may be suspicious, TRAWW will determine, at its sole discretion, whether or not and how to further investigate the matter. This may include gathering additional information internally or from third-party sources, contacting the government agencies. When deemed appropriate, TRAWW will cancel the related proposed transaction and or contract.

ARTICLE IV: REPORTING AND TRAINING POLICY.

4.1. Suspicious Transactions and Regulatory Reporting.

TRAWW will, through legal counsel, contact an appropriate authority for any transactions where we know, or have substantial competent evidential matter that would lead to the conclusion that:

- 4.1.1. A transaction involves funds derived from illegal activity or is intended or conducted in order to hide or disguise funds or assets derived from illegal activity as part of a plan to violate or evade applicable laws or regulations; or
- 4.1.2. A transaction has no apparent lawful purpose; or
- 4.1.3. A transaction seeks to involve the use of TRAWW to facilitate criminal activity; or
- 4.1.4. A transaction seeks to involve the use of TRAWW to facilitate terrorist activity.

4.2. Regulatory Report Retention.

TRAWW will retain copies of any report filed and the original or business record equivalent of any supporting documentation for five years from the date of filing the report. Further, TRAWW will identify and maintain supporting documentation and make such information available to any appropriate law enforcement agency upon request. Moreover TRAWW will not notify any person involved in the transaction that the transaction has been reported, except as permitted by applicable regulations.

4.3. Confidential Reporting of AML Non-Compliance:

Employees will promptly report any substantial violations of TRAWW's AML compliance program to the AML Compliance Officer, unless the violations implicate the AML Compliance Officer, in which case the employee shall report to said employee's supervisor. Such reports will be confidential.

4.4. Training:

TRAWW will develop ongoing employee training under the leadership of the AML Compliance Officer. TRAWW training will occur on an annual basis. It will be based on TRAWW's business model and procedures that shall be updated as necessary to reflect changes in applicable statutes and regulations. TRAWW's training will include, at a minimum:

- 4.4.1. How to identify red flags and signs of money laundering;
- 4.4.2. What to do once the risk is identified;
- 4.4.3. What employees' roles are in TRAWW's compliance efforts and how to perform them;
- 4.4.4. TRAWW's record retention policy;
- 4.4.5. The disciplinary consequences for non-compliance with the corporate policies.

Further, TRAWW will review our operations to ascertain whether certain employees, such as those in compliance, require specialized additional training.

ARTICLE IV: PROGRAM MONITORING.**5.1. Program to Independently Examine AML Program:**

An independent third party will perform TRAWW's examination of its AML program at least annually. TRAWW will evaluate the qualifications of the independent third party to ensure they have a working knowledge of applicable requirements under applicable statutes and regulations. Subsequent to TRAWW's completion of the independent examination, staff will report its findings to senior management. TRAWW will promptly address each of the resulting recommendations and keep a record of how each noted deficiency was resolved.

5.2. Monitoring Employee Conduct and Accounts:

TRAWW will subject employee performance of duties to the same AML guidelines as Counter-Party Agreements.

CHAIN OF CUSTODY PROCEDURES**ARTICLE VI: COC POLICY.****6.1. TRAWW Chain of Custody (hereinafter "COC") Policy.**

TRAWW participates in worldwide efforts to ensure that Precious Metals come from legitimate and ethical sources. Toward this end, TRAWW cooperates with both law enforcement and its supply chain industry partners such as: insurance underwriters, Banking Institutions, LBMA recognized security transport companies, Refiners (LBMA or others), etc.

To ensure that the Precious Metals have not been associated with criminal activity, terrorist activity, human rights abuse, or armed conflict TRAWW maintains strict policies designed to ensure that it only interacts with legitimate Counter-Parties. Further, TRAWW maintains a no tolerance posture with Counter-Parties that are non-compliant.

TRAWW's Chain of Custody Procedures integrate with its associated AML and DD procedures to form its corporate standards for business conduct and commitment to:

- 6.1.1. A culture of honesty and opposition to fraud and corruption;
- 6.1.2. Maintenance of high moral, ethical and social standards in our business activities; and,
- 6.1.3. Maintenance of proper business relationships with all Counter-Parties, including government agencies and their employees.

6.2. TRAWW Chain of Custody Management Systems:

TRAWW implements its Chain of Custody Policy through a comprehensive set of management systems. These Systems implement the general standards of business conduct set forth above, as well as setting forth the internal compliance standards that comport with applicable statutes and regulations. TRAWW's Systems govern not only our

internal corporate conduct and culture; they also govern TRAWW's interaction with Counter-Parties and government agencies. These Systems ultimately find voice in rigorous contractual negotiations and clearly drafted Agreements with all of TRAWW's counter-Parties. In this regard we commit to the following:

- 6.2.1. **Written Agreements with Acquisition Counter-Parties:** TRAWW maintains internal legal counsel as well as specialized external counsel for corporate, tax, international and litigation matters. All TRAWW Counter-Parties execute Agreements in which it's Chain of Custody and related AML Policies are embedded. This includes, but is not limited to, executed Counter-Party declarations.
- 6.2.2. **Chain of Custody Compliance Officer:** Mr. Corey Keller serves as TRAWW's Chain of Custody Compliance Officer. Mr. Keller has extensive experience in the practical aspects of Chain of Custody management. In this regard, Mr. Keller's duties include final review of all Agreements with Counter-Parties, including but not limited to all Purchase Agreements related to precious metals. This provides Mr. Keller the perfect vantage point from which to evaluate risk associated with each acquisition at its inception.
- 6.2.3. **OECD, World Gold Council and LBMA Guidelines:** TRAWW's Chain of Custody Compliance Officer maintains current awareness of all changes to these regulatory mandates to insure TRAWW's compliance.

6.3. **Non-Compliant Counter-Parties.**

TRAWW will not tolerate, profit from, contribute to, assist or facilitate the commission of:

- 6.3.1. Cruel, inhuman and degrading treatment;
- 6.3.2. Forced or compulsory labor;
- 6.3.3. Child labor;
- 6.3.4. Human rights violations or abuses; or
- 6.3.5. Crimes against humanity.

TRAWW will immediately discontinue Agreements with Counter-Parties in the Chain of Custody of precious metals where TRAWW identifies the risk of sourcing precious metals is linked to the abuses described above.

Further, TRAWW will not tolerate acquisition of precious metals from Counter-Parties that directly or indirectly support armed groups, including, but not limited to, non-state armed groups or their affiliates who illegally:

- 6.3.6. Control mine sites, transportation routes, points where precious metals are traded and or upstream actors in the Chain of Custody;
- 6.3.7. Tax or extort money or precious metals (i) at mine sites, along transportation routes or at points where they are traded, or (ii) from intermediaries, export companies or international traders in the Chain of Custody supply chain.

TRAWW will immediately discontinue Agreements with Counter-Parties in the Chain of Custody of precious metals where TRAWW identifies the risk of sourcing precious metals linked to the abuses described above. Further, TRAWW affirms that it will immediately discontinue Agreements with Counter-Parties where the role of public or private security forces exceeds the provision of security to workers, facilities, and equipment in accordance with the rule of law.

ARTICLE VII: CORRUPTION.

7.1. **Bribes and Undue Influence.**

TRAWW will not directly or through Counter-Parties attempt to improperly influence others or offer, promise, give, or demand bribes or kickbacks in any form. Further TRAWW will refuse the solicitation of same; ensuring that company funds, assets or property will not be used to benefit any Counter-Parties including government officials that violate this policy.

ARTICLE VIII: PRODUCT ORIGIN.

8.1. **Origin of Precious Metals.**

TRAWW will not disguise or misrepresent the origin of precious metals acquisitions and will not tolerate this behavior from any Counter-Party. Further, TRAWW will not tolerate the misrepresentation of extraction statistics to avoid taxes, fees or royalties paid to governments by any Counter-Party.

ARTICLE IX: MONEY LAUNDERING.**9.1. Money Laundering through Precious Metals.**

TRAWW will support efforts and contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering from, or connected to, the extraction, trade, handling, transport or export of precious metals.

ARTICLE X: POLICY COMPLIANCE.**10.1. TRAWW Compliance- Employees, Agents, and Consultants.**

TRAWW requires their employees, agents, consultants, and Counter-Parties to comply with this policy. TRAWW will enforce this Policy with appropriate disciplinary measures, up to and including termination of employment or third party service contracts.

10.2. Senior Manager Approval:

TRAWW's senior management has approved these Chain of Custody and Anti-Money Laundering Compliance and Supervisory Procedures. Further, TRAWW's senior management will take steps reasonably designed to foster and monitor compliance on an ongoing basis therewith.

For questions and concerns regarding this policy or its implementation, please contact TRAWW's Compliance Team at info@TRAWW.ch.

TRAWW, LTD.
Stuart Hamon, Director



January 2023



AML-CFT POLICY ONBOARDING FORMS

TRAWW





NEW CLIENT ONBOARDING PACKAGE

General KYC ("Know Your Client")

1. BUSINESS INFORMATION

a. Registered Name _____

b. Legal Domicile _____

c. Inception Date _____

d. Registration N° _____

e. Tax / VAT N° _____

f. Industry Classification _____

g. Board of Directors _____

h. Officers _____

i. Shareholders (over 5%) _____

j. Registered Agent _____

k. Authorized Signatory _____

l. Authorized Agents _____

2. CONTACT COORDINATES

a. Registered Address

Add 1: _____

Add 2: _____

City: _____ State: _____

Country: _____ Postal Code: _____

b. Mailing Address
Add 1: _____
Add 2: _____
City: _____ State: _____
Country: _____ Postal Code: _____

c. Address for Legal Notices
Add 1: _____
Add 2: _____
City: _____ State: _____
Country: _____ Postal Code: _____

d. Phone N° _____
f. Mobile N° _____
h. Website _____
e. Fax N° _____
g. Alt. Mobile _____
i. Email _____

3. PERSONAL INFORMATION OF OFFICERS

a. First Name _____ b. Middle _____
c. Last Name _____ d. DOB _____
e. SSN / ID _____ e.2 Type _____
f. Nationality _____ g. Language _____
h. Passport N° _____ i. Country _____
j. Issue Date _____ k. Expire Date _____
l. Address
Add 1: _____
Add 2: _____
City: _____ State: _____
Country: _____ Postal Code: _____

** Duplicate for each Director and Officer*

4. BENEFICIAL OWNER INFORMATION

a. First Name _____ b. Middle _____
c. Last Name _____ d. DOB _____
e. SSN / ID _____ e.2 Type _____
f. Nationality _____ g. Language _____
h. Passport N° _____ i. Country _____
j. Issue Date _____ k. Expire Date _____

I. Address
Add 1: _____
Add 2: _____
City: _____ State: _____
Country: _____ Postal Code: _____

** Duplicate for each Shaeholder owning 5% or more.*

5. LEGAL COUNSEL

a. Legal Firm _____
b. Firm Contact _____
c. address
Add 1: _____
Add 2: _____
City: _____ State: _____
Country: _____ Postal Code: _____
d. Phone N° _____
f. Mobile N° _____
h. Website _____
e. Fax N° _____
g. Alt. Mobile _____
i. Email _____

6. Bank Information

a. Bank Name _____
b. Address
Add 1: _____
Add 2: _____
City: _____ State: _____
Country: _____ Postal Code: _____
c. Account Officer _____
d. Phone N° _____
f. Mobile N° _____
h. Website _____
e. Fax N° _____
g. Alt. Mobile _____
i. Email _____
j. Account Name _____
k. Signatory 1 _____ l. Signatory 2 _____
m. Branch Code _____
n. SWIFT Code _____
o. ABA Routing N° _____
p. IBAN N° _____
q. Account N° _____

7. TRADE REFERENCES

Name: _____
email: _____

Phone: _____
Fax: _____

Name: _____
email: _____

Phone: _____
Fax: _____

Name: _____
email: _____

Phone: _____
Fax: _____

8. GENERAL

a. Type of Business _____

b. Are precious metals essential to the business? _____ Yes _____ No

b.2 If no, explain: _____

c. Is the company currently compliant with AML Regulations? _____ Yes _____ No

c.2 If no, explain: _____

d. Does the company have an AML-CFT Policy in place? _____ Yes _____ No

d.2 If yes, please provide a copy of the policy with the submission of this packet.

9. DECLARATION

I, the undersigned, do hereby swear that the information provided herein is both true and accurate. I have signatory authority for the bank account detailed herein and have full authority to execute any and all contracts or agreements relating to pleading and disposition of the company and its assets. All monies transacted from the company are derived from non-criminal origin and are good clean funds. The funds and assets of the company/ individual are in full compliance with the anti-money laundering policies set forth by the Financial Action Task Force (FATF) 6/01.

ON BEHALF OF _____

By: /s/ _____

Name: _____
Title: _____
Date: _____

[CORPORATE SEAL]

CLIENT QUESTIONNAIRE

Recyclable Material

1. COMPANY DETAILS

a. Registered Name _____
b. Trade Name _____
c. Date of Incorporation _____
d. Domicile of Incorporation _____
e. Business Registration N° _____
f. Tax Identification N° _____

g. Registered Address
Add 1: _____
Add 2: _____
City: _____ State: _____
Country: _____ Postal Code: _____

h. Mailing Address
Add 1: _____
Add 2: _____
City: _____ State: _____
Country: _____ Postal Code: _____

i. Address for Legal Notices
Add 1: _____
Add 2: _____
City: _____ State: _____
Country: _____ Postal Code: _____

j. Phone N° _____
l. Mobile N° _____
n. Website _____
k. Fax N° _____
m. Alt. Mobile _____
o. Email _____

p. Is the company publicly traded? _____ Yes _____ No
p.2 If yes, list the exchange and ticker symbol. _____

q. External Financial Auditors: _____

r. How many direct and indirect subsidiaries does the company have? _____
r.2 Please provide a group chart. _____

2. BUSINESS ACTIVITY

a. Type of Business

Bank <input type="checkbox"/> Trader / Dealer <input type="checkbox"/> Financial Intermediary <input type="checkbox"/> Industrial <input type="checkbox"/> Wholesaler <input type="checkbox"/>	Jeweller <input type="checkbox"/> Scrap Dealer <input type="checkbox"/> Coins Dealer <input type="checkbox"/> Mint <input type="checkbox"/> Other <input type="checkbox"/>
Please specify: _____	

b. Core business activity

c. Does the company hold a license to conduct its business? _____ Yes _____ No

c.2 If yes, please provide a copy of any and all licenses held.

d. Primary market(s) served.

e. Primary products.

3. BENEFICIAL OWNERS

a. Shareholder(s) (More than 25%)

Percentage Held (%)	Name	Address	Nationality / Corporate Domicile	DOB / Date of Incorporation

b. Ultimate Beneficial Owner (More than 25%) - INDIVIDUAL ONLY

Percentage Held (%)	Name	Address	Nationality	DOB

4. MANAGEMENT STRUCTURE

	Name	Title	Nationality	DOB
a. Directors (BOD)				
b. Management				

5. FINANCIAL INFORMATION

	Currency	Last Reporting Period	Prior Year
a. Share Capital			
b. Total Shareholders Equity			
c. Total Balance Sheet			
d. Sales			
e. Net income			

** Please provide copy of latest annual report.*

6. HUMAN RESOURCES

a. Number of Employees within Company _____

b. Number of Employees within Group. _____

7. ORIGIN OF PHYSICAL PRECIOUS METALS

a. Profile of your precious metals suppliers (Individual / Company)

b. Primary Countries of Origin of Precious Metals _____

c. Countries of destination of precious metals post refining _____

d. Is the Company legally required to have an import license?

Yes - Provide copy.
 No
 N/A

d. Is the Company legally required to have an export license?

Yes - Provide copy.

No

N/A

8. FACILITIES

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?

YES	NO	N/A

d. What are the types, forms and percentage of precious metals sourced by the Company.

- Recycled precious metal (%_____)
- LBMA GD Bullion
- Non-LBMA Good Delivery Bullion > 995
- Rudimentary Bars
- Other

- Jewellery
- Broken Jewellery
- Collected Waste
- Coins

Specify _____

- Primary Material - Mined Precious Metal (%_____)

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

- Gold
- Silver

Other

Specify _____

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

- Unprocessed recycled precious metals
- LBMA GD Bullion
- Non-LBMA Good Delivery Bullion > 995
- Rudimentary Bars (undefined fineness)
- Other

- Jewellery
- Broken Jewellery
- Collected Waste
- Coins
- Own production waste

Specify _____

- Melted recycled precious metals
- Rudimentary Bars (undefined fineness)

Other

Specify _____

9. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY

<p>a. Has your Company established 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</p>	<p><input type="checkbox"/> Yes - Please provide copy.</p> <p><input type="checkbox"/> No - Please explain.</p>
---	---

<p>b. Does your Company comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?</p>	<p><input type="checkbox"/> Currently Complies</p> <p><input type="checkbox"/> Plans to Comply</p> <p><input type="checkbox"/> No</p>
---	---

<p>c. Does the Company comply or participate with any of the following industry initiatives?</p> <p><input type="checkbox"/> LBMA Responsible Gold Guidance</p> <p><input type="checkbox"/> LBMA Responsible Silver Guidance</p> <p><input type="checkbox"/> RJC Chain of Custody Standard</p> <p><input type="checkbox"/> WGC Conflict Free Gold Standard</p> <p><input type="checkbox"/> Conflict Free Smelter (CFS) Program</p> <p><input type="checkbox"/> Other</p> <p>Specify _____</p> <p>_____</p>	<p>Additional Comments:</p>
--	-----------------------------

<p>d. What are the procedures in place to ensure that the precious metals purchased have not financed conflict?</p>	
---	--

10. ANTI MONEY LANDINGING (AML) - COMBATING FINANCIAL TERRORISM (CFT)

<p>a. Is the Company subject to anti-Money Landering/ Combating Financial Terrorism Regulatory Regimes?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>b. Name of the AML-CFT Regulation</p>	
<p>c. Name of the AML-CFT Regulator</p>	
<p>d. Has the Company established a conformity program that contains AML-CFT policies and procedures, according to internal & international laws, rules and standards.</p>	<p><input type="checkbox"/> Yes, Please provide copy.</p> <p><input type="checkbox"/> No</p>

11. BRIBERY POLICY

<p>a. Does the Company have a bribery policy in place?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
--	--

b. Has the Company or the Senior Management ever been charged anywhere in the world for violation of applicable anti-bribery laws or regulations?	<input type="checkbox"/> Yes, Please provide details <input type="checkbox"/> No
---	---

12. DATA PRIVACY POLICY

a. Does the Company have a Data Protection Policy?	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Does the Company have a Data Protection Commissioner?	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. Does the Company have a certified data storage system or information system?	<input type="checkbox"/> Yes <input type="checkbox"/> No

13. PRECIOUS METALS SUPPLIERS DUE DILIGENCE QUESTIONNAIRE

	Yes	No	N/A
a. Does the Company have a person responsible (Compliance Officer) for all AML-CFT matters (Due Diligence, AML Policies, internal training)? <i>*If yes, please provide us with the name, phone number, and email address.</i>			
b. Is the Company subject to an AML-CFT audit by an independent party or a government authority? <i>* Date of last AML-CFT compliance audit.</i>			
c. Does the Company have an AML-CFT training program for employees?			
d. Does the Company outsource or utilize any third parties to perform any of the compliance functions to be carried out? <i>* If yes, which functions, and to what company are these functions delegated?</i>			
e. How long does the Company retain its due diligence files?			
f. What is the typical profile of your precious metals suppliers?			
<input type="checkbox"/> Corporate % _____	_____		
<input type="checkbox"/> Individuals % _____	_____		

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

Companies	Yes	No	Individuals	Yes	No
Company Name	<input type="checkbox"/>	<input type="checkbox"/>	First and Last 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"/>
Legal Domicile	<input type="checkbox"/>	<input type="checkbox"/>	Nationality	<input type="checkbox"/>	<input type="checkbox"/>
Tax / VAT N°	<input type="checkbox"/>	<input type="checkbox"/>	Copy of ID or Passport	<input type="checkbox"/>	<input type="checkbox"/>
Beneficial Owners	<input type="checkbox"/>	<input type="checkbox"/>	Tax N°	<input type="checkbox"/>	<input type="checkbox"/>
Origin of Metals	<input type="checkbox"/>	<input type="checkbox"/>	Beneficial Owner(s)	<input type="checkbox"/>	<input type="checkbox"/>
Financial Information	<input type="checkbox"/>	<input type="checkbox"/>	Origin of Metals	<input type="checkbox"/>	<input type="checkbox"/>
Business Abstract	<input type="checkbox"/>	<input type="checkbox"/>	Supplier Profile	<input type="checkbox"/>	<input type="checkbox"/>

h. Does the Company have a risk-based assessment of its precious metals suppliers (e.g., low, medium, or high risk)?

i. Does the Company screen precious metals suppliers and transactions against list of persons, entities, or countries issued by government / competent authorities?

j. Does the Company perform enhanced due diligence for high risk precious metals suppliers?

k. Does the Company assess its corporate precious metals suppliers' AML-CFT policies, purchase procedures and practices?

Transactions Monitoring	Yes	No
-------------------------	-----	----

l. Does the Company perform a risk-based assessment to understand the normal and expected transactions of its suppliers (in order to identify any unusual transactions)?

m. Does the Company have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and money instruments (e.g., traveller's cheques) or third party payments?

n. Is the Company required to register all purchases and sales?

o. From which of the following suppliers does the Company purchase its precious metals and what is the average amount of purchase per transaction?

Supplier Type	Purchase Percentage (%)	Average Transaction (USD)
Bank		
Refinery		
Wholesaler		
Corporate		
Individual		

p. What is the usual method of payment the Company uses to pay its precious metals suppliers?

Payment Type	Percentage (%)
Bank Transfer	
Checks	
Cash	

q. Does the Company have a procedure in place to prevent, detect, and report suspicious transactions from its suppliers to the relevant authorities?

r. How many suspect reports has the Company filled and handed over to the relevant Authority in the last 2 years

s. Does the Company have a maximum amount as per internal policy or regulatory framework for the following:

- Amount allowed for cash payment?

If yes, how much?

- Transaction limit per supplier basis (USD)

If yes, how much?

t. Where cash transaction reporting is mandatory, does the Company have procedures to identify transactions structured to avoid such obligations?

Yes

No

N/A

14 TRANSACTION MONITORING ON PURCHASE FROM INDIVIDUALS ONLY

• Only to be completed by Companies purchasing precious metals from individuals.

a. Does the Company perform statistics on precious metals sold by person in order to identify unusual transactions?

b. Does the Company have a specific procedure if a deal with an individual is significantly higher than the average deal?

* If yes, please describe:

Yes

No

N/A

	Yes	No	N/A
<p>c. Does the Company have a procedure to prohibit multiple individual sales, at separate counters/ locations to sell a small amount each time, but for a global material amount (smurfing)?</p> <p><i>* If yes, please describe:</i></p>			
<div style="border: 1px solid black; height: 60px; width: 100%;"></div>			

15. INDUSTRIAL SOURCING
 • Only to be completed by Industrial Companies.

<p>a. What type of precious metals do you purchase for industrial purposes?</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> LBMA GD Bullion <input type="checkbox"/> Non-LBMA Good Delivery Bullion > 995 <input type="checkbox"/> Other Specify _____ </div> <div style="width: 45%;"> <input type="checkbox"/> Semi Finished <input type="checkbox"/> Grains <input type="checkbox"/> Industrial Products Specify _____ </div> </div>			
<p>b. In which countries do you primarily purchase precious metals?</p>			
<p>c. From whom do you source your precious metals products?</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Refineries <input type="checkbox"/> Banks <input type="checkbox"/> Wholesalers Specify _____ </div> <div style="width: 45%;"> <input type="checkbox"/> Industrial <input type="checkbox"/> Other Specify _____ </div> </div>			
<p>d. Have you identified the refinery which produced the precious metals used in your supply chain?</p>			
<p>e. Have you assessed the refier's due diligence policies and practices?</p>			

Comments / Additional information (please indicate which questions the information is in reference to):

SIGNATURE

I hereby declare that the information given above is true and accurate to the best of my knowledge, as of the date below. I undertake to automatically update the information upon any material change.

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



CLIENT QUESTIONNAIRE

Mined Material

1. COMPANY DETAILS

a. Registered Name _____

b Trade Name _____

c. Date of Incorporation _____

d. Domicile of Incorporation _____

e. Business Registration N° _____

f. Tax Identification N° _____

g. Registered Address Add 1: _____

Add 2: _____

City: _____ State: _____

Country: _____ Postal Code: _____

h. Mailing Address Add 1: _____

Add 2: _____

City: _____ State: _____

Country: _____ Postal Code: _____

i. Address for Legal Notices Add 1: _____

Add 2: _____

City: _____ State: _____

Country: _____ Postal Code: _____

j. Phone N° _____

k. Fax N° _____

l. Mobile N° _____

m. Alt. Mobile _____

n. Website _____

o. Email _____

p. Is the company publicly traded? _____ Yes _____ No

p.2 If yes, list the exchange and ticker symbol. _____

q. External Financial Auditors: _____

r. How many direct and indirect subsidiaries does the company have? _____

r.2 Please provide a group chart.

2. BUSINESS ACTIVITY

a. Business Type

Large Scale Mine, (> 100,000 oz production per anum) <input type="checkbox"/> Medium Scale Mine (30,000-100,000 oz production per anum) <input type="checkbox"/>	Precious Metals Trader <input type="checkbox"/> Small Scale Mine (< 30,000 oz) <input type="checkbox"/> Other <input type="checkbox"/> Please specify: _____
---	---

b. Core business activity

c. Does the company hold a license to conduct its business? _____ Yes _____ No

c.2 If yes, please provide a copy of any and all licenses held.

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

--

3. BENEFICIAL OWNERS

a. Shareholder(s) (More than 25%)

Percentage Held (%)	Name	Address	Nationality / Corporate Domicile	DOB / Date of Incorporation

b. Ultimate Beneficial Owner (More than 25%) - INDIVIDUAL ONLY

Percentage Held (%)	Name	Address	Nationality	DOB

4. MANAGEMENT STRUCTURE

	Name	Title	Nationality	DOB
a. Directors (BOD)				
b. Management				

5. FINANCIAL INFORMATION

5.1 Financial Statement Details.	Currency	Last Reporting Period	Prior Year
a. Share Capital			
b. Total Shareholders Equity			
c. Total Balance Sheet			
d. Sales			
e. Net income			

* Please provide copy of latest annual report.

5.2 Other Financial Information

f. Source of mining operational funding.	<input type="checkbox"/> Own Equity.								
	<input type="checkbox"/> Government entity. Names: _____								
	<input type="checkbox"/> Bank Loan. Names: _____								
	<input type="checkbox"/> Other Third Party. Names: _____								
g. What is the Company's usual methodology for payment to 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>Checks</td> <td></td> </tr> <tr> <td>Cash</td> <td></td> </tr> </tbody> </table>	Payment Type	Percentage (%)	Bank Transfers		Checks		Cash	
	Payment Type	Percentage (%)							
	Bank Transfers								
Checks									
Cash									

6. 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 labor regulated in mining activity in the country / province of operations?			

d. Are public security forces used on or around the mine site?			
--	--	--	--

7. HUMAN RESOURCES

a. Number of Employees within Company	
b. Number of Employees within Group.	

8. ORIGIN OF PHYSICAL PRECIOUS METALS

a. From how many mining site(s) is the gold extracted?	
b. Name 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. Is the mining site(s) legally required to hold a mining license? <i>Please provide a copy /copies.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No Issue Date: _____ Expiry Date: _____
f. What is the daily production of the mining site(s)?	
g. What are the estimated reserves of the mining site(s)?	
h. How many people are working on the mining site(s)?	
i. What is the gold extraction method (mining equipment & methods)?	
j. Are there comprehensive procedures and systems to guarantee the safety of personnel at the mining site (such as use of proper protective equipment, health and safety training, first aid materials and emergency procedures)?	<input type="checkbox"/> Yes, Please describe: _____ <input type="checkbox"/> No
k. Are there comprehensive procedures and systems at the mining site to avoid negative impact to the environment by gold extraction (such as adequate tailing treatment, system to avoid pollution emission, etc.)?	<input type="checkbox"/> Yes, Please describe: _____ <input type="checkbox"/> No
l. Does the mining site engage with affected communities and support local community development?	<input type="checkbox"/> Yes, Please describe: _____ <input type="checkbox"/> No
m. Is there a comprehensive procedure at the mining site to ensure prevention of child labour?	<input type="checkbox"/> Yes, Please describe: _____ <input type="checkbox"/> No

<p>n. Are there any armed groups stationed on or near the mine site?</p> <p><i>If yes, please provide information as to the reason.</i></p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> State Armed Group</p> <p><input type="checkbox"/> Non State Armed Group</p> <p><input type="checkbox"/> Public/ Private Security</p> <p>_____</p> <p>_____</p> <p><input type="checkbox"/> No</p>
<p>o. Does the Mining Company employ professional security forces to control the mine site?</p>	<p><input type="checkbox"/> Yes, Please describe:</p> <p>_____</p> <p><input type="checkbox"/> No</p>
<p>p. Has the Regulator responsible for mining operations carried out an on-site visit?</p>	<p><input type="checkbox"/> Yes, date of last visit.</p> <p>_____</p> <p><input type="checkbox"/> No</p>
<p>q. If no on-site visit has been performed yet (question 8p above), is there any visit planned?</p>	<p><input type="checkbox"/> Yes, date of last visit.</p> <p>_____</p> <p><input type="checkbox"/> No</p>

9. PROCESSING PLANT

<p>a. Where exactly is the gold processing plant(s) located (country, province, closest city, GPS coordinates)?</p>	
<p>b. How many people are working in the gold processing plant?</p>	
<p>c. Is the gold processing plant held by the mining company or is it outsourced to an external party?</p>	<p><input type="checkbox"/> Company owned plant</p> <p><input type="checkbox"/> Processing is outsourced</p> <p>Name: _____</p>
<p>d. If the Mining Company has its own processing plant, does it also source mined gold for processing from external parties.</p>	<p><input type="checkbox"/> Yes</p> <p>Name and location of mining sites:</p> <p>_____</p> <p><input type="checkbox"/> No</p>
<p>e. What is the gold processing method (processing equipment and methods)?</p>	
<p>f. What chemical products are used during processing?</p>	<p><input type="checkbox"/> Mercury</p> <p><input type="checkbox"/> Cyanide</p> <p><input type="checkbox"/> Other</p> <p>_____</p>
<p>g. What is the capacity of the processing plant per day?</p>	

<p>h. Is the Company legally required to have a license to export precious metals?</p>	<p><input type="checkbox"/> Yes - Please provide copy. Issue Date: _____ Expiry Date: _____</p> <p><input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>i. Are there any comprehensive procedures and system to guarantee the safety of personnel in the processing plant (such as use of proper protective equipment, health and safety training, first aid materials and emergency procedures)?</p>	<p><input type="checkbox"/> Yes - Please describe. _____ _____</p> <p><input type="checkbox"/> No</p>
<p>j. Does the processing plant have comprehensive processes to avoid negative impact to the environment by gold processing (such as adequate tailing treatment, system to avoid pollution emission, etc)?</p>	<p><input type="checkbox"/> Yes - Please describe. _____ _____</p> <p><input type="checkbox"/> No</p>
<p>k. Does the processing plant engage with affected communities and support local community development?</p>	<p><input type="checkbox"/> Yes - Please describe. _____ _____</p> <p><input type="checkbox"/> No</p>
<p>l. Does the processing plant have a comprehensive procedure to ensure prevention of child labour?</p>	<p><input type="checkbox"/> Yes - Please describe. _____ _____</p> <p><input type="checkbox"/> No</p>
<p>m. Is there any armed groups stationed on or near the processing plant?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> State Armed Group <input type="checkbox"/> Non State Armed Group <input type="checkbox"/> Public/ Private Security</p> <p>_____ _____</p> <p><input type="checkbox"/> No</p>
<p>n. Does the Mining Company employ professional security forces to control the mine site?</p>	<p><input type="checkbox"/> Yes, Please describe: _____</p> <p><input type="checkbox"/> No</p>

Materials

<p>a. What types of precious metals is the Company planning to send for refining?</p> <p><input type="checkbox"/> Gold <input type="checkbox"/> Other Please specify: _____</p>

b. What is the origin of the precious metals planned to be sent for refining?

- Gold Ore
- Gold Concentrate
- Mining by-product

- Gold Dore
- Other

Specify: _____

Transportation

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

By the Company

By a third party (external company). Which company? _____

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

By the Company

- Truck
- Aircraft
- Other - Please specify: _____
- Helicopter
- Armoured Car

By a third party (external company). Which company? _____

- Truck
- Aircraft
- Other - Please specify: _____
- Helicopter
- Armoured Car

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

By the Company

- Aircraft
- Boat
- Armoured Car
- Other

Please specify: _____

By a third party (external company). Which company? _____

- Aircraft
- Boat
- Armoured Car
- Other

Please specify: _____

d. Is there any military or police checkpoint along the road between the mining site and the export location?

Yes - how many and for what purpose.

No

10. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY

<p>a. Has your Company established 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</p>	<p><input type="checkbox"/> Yes - Please provide copy.</p> <p><input type="checkbox"/> No - Please explain.</p>
<p>b. Does your Company comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?</p>	<p><input type="checkbox"/> Currently Complies</p> <p><input type="checkbox"/> Plans to Comply</p> <p><input type="checkbox"/> No</p>
<p>c. Does the Company comply or participate with any of the following industry initiatives?</p> <p><input type="checkbox"/> RJC Chain of Custody Standard</p> <p><input type="checkbox"/> RJC Code of Practices</p> <p><input type="checkbox"/> WGC Conflict Free Gold Standard</p> <p><input type="checkbox"/> Fair Trade Standard</p> <p><input type="checkbox"/> Fair Mined Standard</p> <p><input type="checkbox"/> Other</p> <p>Specify _____</p> <p>_____</p> <p><i>Please provide copy of certificate.</i></p>	<p>Additional Comments:</p>
<p>d. What are the procedures in place to ensure that the precious metals purchased have not financed conflict?</p>	

11. ANTI MONEY LANDINGING (AML) - COMBATING FINANCIAL TERRORISM (CFT)

<p>a. Is the Company subject to Anti-Money Landering/ Combating Financial Terrorism Regulatory Regimes?</p>	<p><input type="checkbox"/> Yes - please fill in the Wolfsberg questionnaire.</p> <p><input type="checkbox"/> No</p>
<p>b. Name of the AML-CFT Regulation</p>	
<p>c. Name of the AML-CFT Regulator</p>	
<p>d. Has the Company established a conformity program that contains AML-CFT policies and procedures, according to internal & international laws, rules and standards.</p>	<p><input type="checkbox"/> Yes, Please provide copy.</p> <p><input type="checkbox"/> No</p>

12. BRIBERY POLICY

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

SIGNATURE

I hereby declare that the information given above is true and accurate to the best of my knowledge, as of the date below. I undertake to automatically update the information upon any material change.

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

ATTACHMENT - TO BE FILLED OUT ONLY BY COMPANIES 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 all relevant additional 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 as a 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 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
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10. Does the Corporate have a risk-based assessment of its customer base 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
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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 the Prevention and Detection of Transactions with Illegally Obtained Funds.	Yes	No
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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 only operates with correspondent banks that possess licenses to operate in their countries of origin?		

V. Transaction Monitoring	Yes	No
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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.		
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<p>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?</p>		
<p>24. Does the Corporate retain records of its training sessions including attendance records and relevant training materials used?</p>		
<p>25. Does the Corporate communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?</p>		
<p>26. Does the Corporate employ third parties to carry out some of the functions of the Corporate?</p>		
<p>27. If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes:</p> <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities; • Examples of different forms of money laundering involving the Corporate's products and services • Internal policies to prevent money laundering 		

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



SITE VISIT - INSPECTION FORM

Mined Material

Conducted by: _____

Date: _____

PURPOSE

To standardize the reporting parameters for on-site visits to mines in the supply chain.

SUPPLIER

Name:	
Site (mine) Name:	
GPS Coordinates of mine:	
Name of mine site operator:	
Name of the mine owner if different than operator. Start date and end date of mining rights.	

PERMIT

Permit(s) Type(s):	
Has the Local Authorities / Regulator performed an on-site visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is a visit by Local Authorities / Regulator planned within the next 12 months?	<input type="checkbox"/> Yes <input type="checkbox"/> No

MINE WORKERS

Approximate total number of workers.	
Have you seen any evidence of children working at the site during the visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please indicate their tasks: _____ _____ _____

<p>Have you seen any evidence of vulnerable individuals or groups working during the on-site visit?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please indicate their tasks:</p>
<p>Are any workers employed by subcontractors?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Have you identified any use of forced labor? (e.g., not permitting employees to change jobs)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Do the miners live on the premises of the mine? (e.g., in a dormitory)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>How do you assess the quality of the camp?</p>	<p><input type="checkbox"/> Unacceptable</p> <p><input type="checkbox"/> Basic</p> <p><input type="checkbox"/> Comfortable</p>
<p>Have you seen any evidence of pressure, threats, bad or degrading treatment, etc., of employees, including sexual violence?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Comments:</p>
<p>Are the employees represented by a syndicate or equivalent body?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Have the employees been on strike during the past 12 month period?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please explain why:</p>
<p>Other comments:</p>	

HEALTH & SAFETY

Did you see any visible emergency plan?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Did you see any first aid equipment?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the workplace environment look secure?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is personal protective equipment (PPE) available for employees and on site contractors? (e.g. head protection, safety footwear, protective clothing, face mask, etc.)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the PPE look appropriate and is it properly used and worn by all personnel?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the mine provide safety training to visitors?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the mine use the accident rate as a key performance indicator?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
What is the mine safety track record?		
Are there appropriate procedures to train the security personnel?	<input type="checkbox"/> Yes <input type="checkbox"/> No Comments:	
Are there appropriate procedures to screen security personnel during the hiring process?	<input type="checkbox"/> Yes <input type="checkbox"/> No Comments:	
Other comments:		

GOLD EXTRACTION AND PROCESSING METHOD

Please describe the mining site. (open pit, underground, etc.)	
Please describe the extraction technique.	
Please describe the mining equipment in use (e.g., compressor, excavator, jack hammer, water pumps, etc.).	
Is there any routine maintenance program for mining equipment, and are maintenance records kept?	<input type="checkbox"/> Yes <input type="checkbox"/> No Comments:
Please describe the processing techniques, including chemical products used.	
Please describe the method / process used to avoid negative impact on the environment (e.g., adequate tailing treatment, emission systems, etc.)	
What type of material is produced by the mine, to be sent for secondary refining?	
Is the infrastructure and / or the equipment set up proportionate to the production figures?	<input type="checkbox"/> Yes <input type="checkbox"/> No Comments:
Other comments:	

ARTISANAL MINING NEXT TO THE MINE SITE

Have you identified any artisanal miners next to the mine site?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, estimate the number of ASM miners on the concession.	
Can these ASM miners be considered Legitimate ASM producers?	<input type="checkbox"/> Yes <input type="checkbox"/> No
How does the mine handle the ASM miners next to the mine site?	
Have there been any instances of conflict or tension? If yes, please describe.	<input type="checkbox"/> Yes <input type="checkbox"/> No Comments:
Does the mine source material from the artisanal miners on its concession?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the mine source ore or doře from mines outside its concession?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Other comments:	

COMMUNITY

Is the mine positively affecting the surrounding communities?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the mine negatively affecting the surrounding communities? (health and safety, access rights)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the community facing issues that could impact our reputation? (e.g., organized crime, prostitution, alcoholism, abuse of fragile community members, childrens schooling, drugs, etc.)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Have there been demonstration or social unrest in relation to the mine? If so, how was it handled by the mine and the Local Authorities?	<input type="checkbox"/> Yes <input type="checkbox"/> No Comments:

CONFLICT AREA AND SECURITY

Is the mine located in a conflict area?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Have you gone through any military / police checkpoints along the road from the mining site to the airport?	<input type="checkbox"/> Yes <input type="checkbox"/> No Comments:
Are there any armed groups stationed on /near the mine site?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes: Is it a state armed group? <input type="checkbox"/> Yes <input type="checkbox"/> No Is it a non-state armed group? <input type="checkbox"/> Yes <input type="checkbox"/> No Is it a public or private security forces? <input type="checkbox"/> Yes <input type="checkbox"/> No
Please describe the general site security infrastructure. (CCTV, perimeter fence, controlled access points, etc.)	
Please describe the precious metals storage security infrastructure and processes.	
Please describe the storage facility and security for on-site hazardous chemicals.	
How do you assess the security infrastructure?	<input type="checkbox"/> Adequate <input type="checkbox"/> Inadequate Comments:
Have you identified any indication of illegal taxation or extortion of money across the whole supply chain?	<input type="checkbox"/> Yes <input type="checkbox"/> No Comments:

Please describe the environment relating to tax / fees / royalties paid to government (taxes on extraction, trade, transport and export of gold.)	
Other comments:	

Transportation

Please describe the transportation method from mine site to export location.	
Other comments:	

RELATIONSHIP MANAGER ASSESSMENT

Where appropriate, have you engaged with the counterparty to improve responsible supply chain practices?	<input type="checkbox"/> Yes <input type="checkbox"/> No Comments:
Overall assessment with positive and improvement points.	

SIGNATURE

	Site Inspector 1	Site Inspector 2
Signature		
Print Name:		
Title:		
Company Name:		
Date and Location:		