IGR GUIDELINES FOR ACCOUNT OPENNING FOR RECYCLABLE GOLD

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

All documents must be **certified colored copies**

All documents must be submitted in one of the following languages : ***English or Turkish***.

All documents must be **updated.**

DOCUMENTS REQUIRED

1) Company Registration Documents :
- Articles of Association***(notarized/apostilled)***
- Certificate of Incorporation***(notarized/apostilled)***
- Certificate of Good Standing***(notarized/apostilled)***
- List of Authorized Signatures and Beneficial Owners***(notarized/apostilled)***
- Tax Registry ***(notarized/apostilled)***
- Commerce Registry/ Business Register Extract***(notarized/apostilled)***

2) Valid License &Certifications&Reports &Policy&Procedures
- License to deal with Export and and Import Precious Metals **(notarized/apostilled)**
- Financial &IndependentAudit Reports
- Counterparty's Policies& Procedures (AML-CFT Policy, Responsible Gold Supply Chain Policy, Bribery policy, Child Labor Policy etc.)

3) Owner or Shareolder's identification
- List of beneficial owner or shareholders of the company **(att. *Clear and Colored Passport and Visa Page Copies)* *(notarized/apostilled)***
- List of directors of the company (board members) **(att. *Clear and Colored Passport and Visa Page Copies) (notarized/apostilled)***
- Utility bill of the office (Phone, Electricity, etc...)

4) Bank account details
- Bank account numbers
- Bank reference letters

5) Duly Completed Forms
- IGR Questionnaire **Form 1**
- IGR Compliance Agreement **Form 2**
- IGR Child Labour **Form 3**
- IGR Authorisation Letter for Transactions **Form 4**
- IGR Bank Details **Form 5**

6) Undertakings (please read the entire documents and make sure you fully understand them before starting to apply openning an account with İstanbul Gold Refinery (IGR)

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High Risk Areas
http://www.oecd.org/daf/inv/mne/mining.htm
- LBMA Responsible Gold Guidance
http://www.lbma.org.uk/assets/RGG20130118.pdf
- DMCC Practical Guidance
http://www.dmcc.ae/jltauthority/gold/files/2013/01/DMCC- Practical-Guidance-for-Responsible-Supply-Chain.pdf

ACCOUNT OPENNING DOCUMENTS CHECK LIST

Please mark the documents that you provide us.

Articles of Association	☐
Certificate of Incorporation	☐
Certificate of Good Standing	☐
List of Authorized Signatures and Beneficial Owners	☐
Tax Registry	☐
Commerce Registry/ Business Register Extract	☐
Trade License to deal with and export Precious Metals	☐
Latest Financial& Audit Reports	☐
Company Policies&Procedures	☐
Proof copy of all Owner&Shareolder's&Benificiary's ID Copies	☐
Utility bill of the office (Phone, Electricity, etc...)	☐
IGR Compliance Forms(1-5)	☐

Authorised signatory

Name

Title

Date,Place

If you have any questions regarding the documents, supply chain due diligence policy or its implementation please contact our ***Compliance Department*** via compliance@iar.com.tr or telephone numbers; +90 542 404 57 51, +90 543 684 79 01, +90 212 603 01 01 (ext.1083).

Form 1

Document Code :IAR –C 01
Revision Date: 03. 01.2017
Revision No:001

IGR Questionnaire – Recyclable Gold

1. COMPANY DETAILS	
a. Name	
b. Registered Address	
c. Business Address	
d. Phone Number	
e. Date of Incorporation	
f. Country of Incorporation	
g. Business Registration Number	
h. Tax Identification/Registration number	
i. If listed, indicate name of stock exchange(s) and ticker	
j. Website	
k. External Financial Auditors	
l. How many direct and indirect subsidiaries does the company have? *Please provide a Group chart*	

2. BUSINESS ACTIVITY		
a. Type of Business	☐ Bank ☐ Precious Metals Trader/Dealer ☐ Other Financial Intermediary ☐ Industrial ☐ Wholesaler	☐ Jeweller ☐ Scrap dealer ☐ Coins dealer ☐ Mint ☐ Others, please specify:
b. Description of core business activity		
c. Does the company hold a license to conduct its business(es)? *Please provide a copy(ies)*		
d. Main Market		
e. Main Products		

3. BENEFICIAL OWNERS					
SHAREHOLDER(S) (MORE THAN 25%)					
Percentage Holding (%)	Name	Address		Country of Incorporation/ Nationality(ies)	Date of Incorporation/ Date of Birth
ULTIMATE BENEFICIAL OWNER (MORE THAN 25% - INDIVIDUAL ONLY)					
Percentage Holding (%)	Name	Address		Nationality(ies)	Date of birth

4. MANAGEMENT STRUCTURE				
	Names	Title	Nationality(ies)	Date of Birth
a. Board of Directors				
b. Management				

5. FINANCIAL INFORMATION			
	Currency	Last Reporting Period	Previous Year
a. Share Capital			
b. Total Shareholder's 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 the Company	
b. Number of Employees within the Group	

7. ORIGIN OF PHYSICAL PRECIOUS METALS	
a. Profile of your precious metals suppliers (Individual / Company)	
b. Country(ies) of origin of precious metals delivered to us?	
c. Countries of destination of precious metals delivered once refined?	
d. Is the Company legally required to have a licence to import precious metals?	☐ Yes – Please provide a copy ☐ No ☐ N/A
e. Is the Company legally required to have a licence to export precious metals?	☐ Yes – Please provide a copy ☐ No ☐ N/A

8. FACILITIES	YES	NO	N/A
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?			

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

☐ **Recycled precious metals (%__________)**

☐ LBMA GD Bullion ☐ Non LBMA Good Delivery Bullion (Au =>995 / AG =>9999)

☐ Rudimentary Bars ☐ Jewellery ☐ Broken jewellery

☐ Coins ☐ Collected waste ☐ Others, please specify

Primary material – mined precious metals (%__________)

____

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

☐ **Gold** ☐ **Others, please specify:**

____

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

Unprocessed recycled precious metals

☐ LBMA GD Bullion ☐ Non LBMA Good Delivery Bullion (Au =>995 / AG=>9999)

☐ Coins ☐ Jewellery ☐ Broken jewellery

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

☐

☐ **Melted recycled precious metals**

____

☐ Rudimentary Bars (undefined dimension and fineness) ☐ Others, please specify:

____

9. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY	
a. Did your institution establish a responsible supply chain of gold from conflict-affected and high risk areas policy which is consistent with the standards set forth in the model supply chain policy in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas? [**http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf**](http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf)	☐ Yes – **Please provide a copy** ☐ No
b. Does your institution comply or plan to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?	☐ Currently complies ☐ Plans to comply ☐ No
c. Is the company complying with any of the following industry initiatives: ☐ LBMA Responsible Gold Guidance ☐ RJC Chain of Custody Standard ☐ WGC Conflict Free Gold Standard ☐ Conflict Free Smelter (CFS) Program ☐ Others, please specify: ____________________	Additional comments:
d. What are the procedures in place to ensure that the precious metals purchased have not financed conflict?	

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

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

12. Data Privacy Protection	
a. Does your company have Data Protection Policy?	☐ Yes ☐ No
b. Does your company have Data Protection Commissioner?	☐ Yes ☐ No
c. Does your company have a certified data storage system or an information system?	☐ Yes ☐ No

13. PRECIOUS METALS SUPPLIERS DUE DILIGENCE QUESTIONNAIRE	YES	NO	N/A
Organisation			
a. Does the Company have a person responsible (Compliance Officer) for all AML-CFT matters (Due Diligence, AML policies, internal training)? If yes, please provide us with his/her name, phone number and e-mail address			
b. Is the Company subject to an AML-CFT audit by an independent party or a governmental party? Date of your last AML-CFT compliance audit:			
c. Does the Company have an AML-CFT training for the employees?			
d. Does the Company delegate to third parties some of the compliance functions to be carried out? If yes, what functions and to which company do you delegate?			
e. How long does the Company keep its due diligence files (records)?			
Precious Metals Suppliers Due Diligence	YES	NO	N/A

f. What is the typical profile of your precious metals suppliers?

☐ Corporate (%___________)	
☐ Individual persons (%________)	

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

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

	YES	NO	N/A
h. Does the Company have a risk-based assessment of its precious metals suppliers (e.g. low, medium or high risks)?			
i. Does the Company screen precious metals suppliers and transactions against lists 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 and purchase procedures and practices?			
Transactions monitoring	YES	NO	N/A
l. Does the Company perform a risk-based assessment to understand the normal and expected transactions of its suppliers (in order to identify the unusual transactions)?			
m. Does the Company have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments (e.g. traveller's cheques) or third party payments?			
n. Does the Company have to register all purchases and sales?			

o. To which of the following suppliers does the Company purchase its precious metals and what is the average amount of purchase by deal?

Supplier type	Purchase percentage (%)	Average amount in USD per deal
Bank		
Corporate		
Individual		

p. What usual payment method does the Company use to pay its precious metals suppliers?

Payment type	Percentage (%)
Bank transfers	
Checks	
Cash	

q. Does the Company have a procedure in place to prevent, detect and report suspicious transactions from its suppliers to the relevant Authority?			
r. How many suspect reports has the Company filled and handed over to the relevant Authority the last two years?			
s. Does the Company have a maximum amount as per internal policy or regulatory framework: • amount allowed for cash payment? If yes, how much? • amount of deal per supplier in USD? If yes, how much?			
t. Where cash transaction reporting is mandatory, does the Company have procedures to identify transactions structured to avoid such obligations?			

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

15. INDUSTRIAL SOURCING – TO BE FILLED ONLY BY INDUSTRIAL COMPANIES	YES	NO	N/A
a. What type of precious metals do you purchase for industrial purposes? ☐ LBMA GD Bullion ☐ Non LBMA Good Delivery Bullion (Au =>995 / AG=>9999) ☐ Grains ☐ Semi-finished products ☐ Industrial products, please describe ☐ Others, please specify			
b. In which country do you purchase your precious metals products?			
c. From whom do you source your precious metal products? ☐ Refineries ☐ Precious metals dealers ☐ Banks ☐ Industrial ☐ Others, please specify			
d. Have you identified the refinery which produced the precious metals used in your supply chain?	☐ Yes ☐ No		
e. Have you assessed the refiner's due diligence policies and practices?			

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

____

____

____

____

____

____

SIGNATURE

I hereby declare that the information given above is true and accurate as of the date of writing. I undertake to automatically inform *[The refinery]* of any material changes.

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

Form 2

CUSTOMER COMPLIANCE AGREEMENT FORM
(Customer Due Diligence Agreement)

Company : ____________________________________

Address : ____________________________________

____

____

Represented by : ____________________________________

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

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

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

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

You will be required to validate, and provide all the information mentioned in the Compliance Questionnaire form, whether the said party is the main source of gold or the subcontractor.
You will remain responsible and accountable for certification and external audit of supplied precious metals to Istanbul Gold Refinery (IGR).

Are you in compliance with Istanbul Gold Refinery (IGR). Compliance Regulations, its Istanbul Gold Refinery (IGR). Gold Supply Chain Due Diligence Policy or are you exempt? (Please mark the correct answer below with an "x") **:**

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

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

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

Reason for exemption: ____

____

____

DECLARATION

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

We hereby declare that the particulars given herein are true, correct and complete to the best of our knowledge and belief, the documents submitted along with this application are genuine and we are not making this application for the purpose of contravention of any Istanbul Gold Refinery (IGR). Policies, rules and regulations.

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

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

Place and date _________________ Name and Title_______________________

Stamp and Authorized Signature________

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Form 3

CHILD LABOR AGREEMENT FORM

We are implementing a risk based supply chain due diligence considering the OECD due diligence guidance for responsible supply chain of minerals from conflict-effected and high risk areas in order to respect human rights regarding the worst form of child labor.
We ensure that we dont have any child labor under the age of 18. We are strictly enforcing penalties for breaches.
Our child labor policy is attached.

..../..../20

Compliance officer
Sign & stamp

Document Code :IAR –C 04
Revision Date: 03. 01.2017
Revision No:004

Form 4

Letter Headed

CUSTOMER AUTHORISATION LETTER FOR TRANSACTIONS

(to be printed on the company letterhead)

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

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

The present indications shall be valid unless otherwise advised by the company in writing.
Signed on behalf of ______________________ (*company stamp*)

_________________________________ ___________________________
Authorised signatory | Authorised signatory

_________________________________ ___________________________
Name | Name

_________________________________ ___________________________
Title | Title

_________________________________ ___________________________
Date,Place | Date,Place

Document Code :IAR –C 05
Revision Date: 03. 01.2017
Revision No:004

Form 5

CUSTOMER BANK ACCOUNT DETAILS

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

Cash settlements

To:	Bank name: Address: Country:
USD	Account Number: Account: IBAN Number: BIC:
TRY	Account Number: Account: IBAN Number: BIC:
EUR	Account Number: Account: IBAN Number: BIC:

Precious Metal Settlements

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

Account Number :

Signed on behalf of ______________________ (*company stamp*)

Authorised signatory	Authorised signatory
Name	Name
Title	Title
Date,Place	Date,Place