

KYC POLICY

Fine gold conducts all its business as a Market Participant as defined by the LBMA Global Precious Metals Code, and is acting in a manner consistent with the principles of the Code. Fine Gold applies following standards:

- LBMA Responsible Gold Guidance;
- OECD Due Diligence Guidance for responsible supply chain of minerals from conflict-affected and high risk areas;
- OECD Due Diligence Guidance Gold Supplement;
- World Gold Council Conflict-free gold standard

We, Fine Gold are aware of the risks that precious metals extraction, processing and trading may be involved into illegal practices, especially from conflict-affected and high-risk areas. Fine Gold has established strong company management systems to identify and assess these risks in supply chain.

Fine Gold implements effective **Know Your Customer-KYC Procedures** for each of its suppliers/customers and third parties. Sufficient information is gathered on every Client and completed on a periodic basis, using a risk-based approach

Risk Categories	Definition	Due diligence to be applied
Low risk A	Gold with clean source from secure regions with secure transport routes Customers with strong documents and records Risk-free/secure regions/countries	Basic due diligence
Medium risk B	Gold from high risk regions or regions affected by conflict and gold with risk transport routes High number of undocumented, unregistered commercial operations Reasonable and well meaning customers Low risk regions	Enhanced due diligence



<p>High risk C</p>	<p>Gold from high risk regions or regions affected by conflict and gold with risk transport routes Mined gold is claimed to be originated from a country that has limited known reserves Recycled gold comes from a country where gold from high risk areas reasonably suspected to transit Counterparty is located in a country representing high-risk for money laundering The mined gold originated from artisanal mining The mined gold is produced with the use of mercury Involvement of PEP</p>	<p>Enhanced due diligence</p>
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Generally all counterparties company names, beneficial owners and management is verified by World-check

Whole supply chain must be declared transparently and below documents should be provided, but not limited to:

- Evidence/certificates determining the origin of gold - Mining concession documentation approved by the Mining agency of each country or body regulatory.
- Mining license, mining titles and precious metals trading License
- Mining capacity and GPS Locations
- Mining agreements between trader and Gold source
- Import/Export license
- A legitimate tax number along with the certificate in order to perform transactions.
- Exclusive Commercial register issued by the Chamber of commerce - country of source.
- Analysis of Partnership structure and authorized signatories
- Judicial background of each shareholder, authorized signatories implementing (world check) and national legal control authority of each country
- Taxation receipts it must include the name of the company and tax number assigned by the government.
- Royalty fees along with the shipping documents issued by the mining agency or tax authority control.
- Artisanal Mining - Gold declaration receipts along with the ID identification and site source.
- Environmental study report or/and environmental license issued by the Ministry of Environment.
- Bank channels - Transactions and payments

Additionally yearly regular mine site visit reports along with photographs and brief descriptions should be performed by Fine Gold or by approved 3rd parties (local NGOs, local organizations).

In accordance with a responsible enhanced due diligence, all information is **verified** before starting the on boarding process with Fine Gold ; in case of any doubts, nonconformity or violations, Fine Gold will not proceed with account opening or terminate existing relationship.

Fine Gold is committed to follow an ethical responsible policies for each source, responsible sourcing that do not integrate any international violations while conducting business and acquiring mineral; none of the issues below will not be tolerated :

- Money Laundering – AML
- Armed Conflict and/or Terrorism Financing - CFT
- Sourcing from countries/persons under sanctions
- Illegal mining - extraction method.
- Illegal mine Sources and mining concession alterations
- Human Rights violation acting as: Inhumane behavior, torture, sexual violence, slavery and oppression
- Crimes such as race-hatred and genocide
- Forced labor or non-voluntary work
- Child labor
- Direct or indirect type of bribery



- Negative Environmental Impacts, environmental violations of restricted areas and world heritage sites.
- Illegal taxation and unlawful documentations

When serious violations concerning the above are identified, transactions and commercial relationship shall be suspended or terminated immediately without any objection.

Fine gold works with international organizations on ground in order to have regular updates about the situation in the mining areas that are often difficult to access. While working with this organizations Fine Gold can react faster in case any red flag is raised.

We also support and educate local communities in order to bring them to the desired compliance level.

