

APPROVED
Chairman of the board
of "Almalyk MMC" JSC
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«16» february 2026

SUPPLY CHAIN DUE
DILIGENCE PROCEDURE

General provisions

1. JSC Almylyk Mining and Metallurgical Complex's ("AMMC") is committed to conducting business responsibly and ensuring that our mineral supply chains uphold the highest standards of ethics, sustainability, and human rights. This Supply Chain Due Diligence Procedure (the "Procedure") outlines our approach to identifying, assessing, and addressing risks of adverse impacts in our supply chains in alignment with the OECD Guidance Annex I, the LBMA Responsible Precious metals Guidance including Responsible gold and silver guidances (the "RGG"), the Copper Mark the Risk Readiness Assessment Criteria Guide (the "RRA") and the Joint Due Diligence Standard (the "JDDS").

2. AMMC is committed to implementing the five-step due diligence process as defined in Annex I of the OECD Guidance.

These steps include:

1. establishing strong company management systems;
2. identifying and assessing risks in the supply chain;
3. designing and implementing a strategy to respond to identified risks;
4. conducting independent third-party audits of supply chain due diligence at identified points in the supply chain and
5. reporting on supply chain due diligence.

3. AMMC pledge to identify, assess, and respond to risks of adverse impacts and actual adverse impacts within AMMC's mineral supply chains. At a minimum, AMMC's approach includes addressing the Annex II risks as outlined in the OECD Guidance, such as:

- serious abuses associated with the extraction, transport, or trade of minerals (e.g., forced labor, child labor, torture);
- direct or indirect support to non-state armed groups;
- public or private security forces acting in violation of international law;
- bribery and fraudulent misrepresentation of the origin of minerals;
- money laundering linked to mineral trade and
- contribution to conflict through the extraction and trade of minerals.

Before entering into a business relationship, AMMC identifies risks in the supply chain and terminates operations with counterparties that pose such risks.

4. AMMC requires suppliers involved in the supply chain to adhere to this Procedure or carry out due diligence on their supply chains in order to identify, assess and mitigate the risks contained in Annex II of the OECD Guidance at a minimum. This requirement applies to all upstream tiers of suppliers, from the origin of the mined metal to supply to AMMC. If risks are identified, AMCC intends to work collaboratively with its suppliers and, where appropriate, other stakeholders, to manage such risks.

5. AMMC makes and receives payments for metals through official banking channels.

6. For the purposes of this Procedure, we use the following lists to determine conflict-affected and high-risk areas:

- Sanctions lists (US, UK, EU, UN);
- Dodd Frank s. 1502;
- EU CAHRA list and
- Heidelberg Barometer.

The areas included in these lists are considered as CAHRAs.

7. AMMC supports the principles of the Extractive Industry Transparency Initiative (EITI) and, in EITI-implementing countries, is committed to implementing the criteria of the EITI. This

includes fostering transparency and accountability in our mineral supply chains and contributing to sustainable development.

8. The Executive Board (“The Board”) has ultimate responsibility for approving, overseeing, the Procedure. The Procurement Department is responsible for conducting supply chain due diligence, risk management, and reporting. The Compliance Officer is appointed for leading this process.

9. AMMC has established a clear and coherent management process to address risks of adverse impacts and actual adverse impacts. This includes:

- assigning responsibilities to dedicated personnel or teams to oversee due diligence efforts;
- integrating risk assessment findings into our decision-making processes;
- developing and implementing action plans to mitigate risks and remediate adverse impacts where they occur;
- monitoring and evaluating the effectiveness of our actions and revising strategies as needed;
- collaborating with suppliers and stakeholders to promote responsible sourcing practices and
- conducting regular audits, including third-party assessments, to evaluate the effectiveness of the due diligence process.

10. AMMC is committed to continuous improvement by developing feedback mechanisms that allow stakeholders to report concerns related to the supply chain. Regular reviews and updates to the Procedure ensure alignment with evolving industry standards and regulations.

11. The Procedure will be updated in case of changes in industry standards, regulations, and changes in the nature of suppliers and types of mined metals to ensure its effectiveness. The Board annually assesses the necessity for such updated. Updated information will be shared with all stakeholders.

12. AMMC has the following e-mail address: responsible_supplychain@agmk.uz, enables parties across the supply chain to report any risk, complaints or other grievances, in a confidential, or if chosen, anonymous manner without fear of retaliation, punishment or discipline.

13. This Procedure applies to all current and prospective suppliers within AMMC supply chains.

1. Scope

This Supply Chain Due Diligence Procedure (the “Procedure”) applies to all aspects of JSC Almalyk Mining and Metallurgical Complex's (“AMMC”) gold, silver, copper, and molybdenum (the “Metals”) sourcing and trading operations. The Procedure is based on the following standards:

1. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
2. The LBMA Responsible Precious metals Guidance including Responsible gold and silver guidances (the “RGG”).
3. The Copper Mark the Risk Readiness Assessment Criteria Guide (the “RRA”).

The main principles of this Procedure based on the OECD’s Five-Step due diligence framework for sourcing minerals from Conflict-Affected and High-Risk Areas:

1. Establish Strong Responsible Sourcing Management Systems (see “2. Governance structure”).

2. Identify and Assess Responsible Sourcing Risks in the Supply Chain (see “3. Risks” and “4. Risk-based due diligence”).

3. Design and Implement Risk Management Strategies (see “4. Risk-based due diligence”).

4. Obtain Independent Assurance on Conformance (see “2. Governance structure”).

5. Report on Management Systems and Performance during the year (see “2. Governance structure“ and “4. Risk-based due diligence“).

This chapter outlines the scope of The Procedure for the supply chains. The purpose of this section is to define the extent of the AMMC's responsibilities, obligations, and the boundaries within which due diligence processes are implemented:

1.1 Applicability

The due diligence process applies to all entities involved in the AMMC’s Metals supply chain, including but not limited to:

- Mines.
- Metals traders, refiners, and other intermediaries.
- Transportation and logistics providers.
- Any third-party entities handling the Metals related transactions.

1.2 Geographical Scope

The Procedure cover all regions and countries from which the Metals are sourced or through which they are transported, with particular attention to:

- Conflict-affected and high-risk areas (CAHRAs).
- Regions with a high prevalence of human rights abuses, illicit activities, or weak governance.
- Any jurisdiction where the metals supply chain activities take place.

1.3 Metals Types and Forms

The scope includes all forms and types of the metals, including gold, silver, copper, and molybdenum, regardless of origin, including:

- Mined metals (both primary and recycled sources).
- All metals-bearing materials in the AMMC’s supply chain.

1.4 Stakeholders

The scope encompasses all stakeholders, including:

- Internal stakeholders such as management, compliance officers, and relevant departments.
- External stakeholders, including suppliers, contractors, and service providers involved in the handling, transportation, and processing of metals.
- Investors, regulatory authorities, and non-governmental organizations (NGOs) involved in overseeing or auditing the company’s adherence to the RGG.

2. Governance Structure

The structure is responsible for overseeing the effective implementation, monitoring, and continuous improvement of due diligence processes across the metals supply chain.

2.1 Executive Board

The Executive Board (the “Board”) has ultimate responsibility for approving and overseeing the Procedure. The structure, the process for selecting members, and the operational procedures of the Board are outlined in the Regulations on the Board published on the AMMC’s corporate website.

For the purposes of this Procedure, the Board responsible for:

- The Procedure aligns with AMMC's values, regulatory requirements, and stakeholder expectations.

- Ensuring internal accountability for the effectiveness of the supply chain due diligence policies and processes.

- Assessing whether effective structures and communication processes are in place for critical information, including the Procedure, to reach relevant employees and metals-supplying counterparties.

- Review the effectiveness of the Procedure and processes to drive continuous improvement annually.

- Evaluating whether the Compliance Officer has adequate resources and support to effectively manage and oversee the operation and monitoring of supply chain due diligence processes and systems.

2.2 Compliance Officer

A designated Compliance Officer, with experience in responsible sourcing and supply chain management, is appointed to oversee all matters related to the metals supply chain. The officer is responsible for:

- Implementing The Procedure,

- Coordinating internal teams and external stakeholders,

- Reviewing the metals supply chain due diligence processes and systems to meet the objectives of the RGG and the RRA and the AMMC's risk management appetite,

- Ensuring effective structures and communication processes are in place for critical information, including the Procedure, to reach relevant employees and metals-supplying counterparties,

- Training employees with respect to supply chain risks (including threat finance and ESG) and preparing and updating of the Procedure and procedures,

- Reviewing Know Your Customer (KYC) files and risk classifications, and requesting additional documentation or information, as necessary,

- Ensuring that appropriate measures are executed in the case of high-risk supply chains or transactions,

- Providing annually information for the Board to perform its duties.

2.3 The Procurement Department

A department and Compliance Officer, are responsible for the daily oversight and management of the due diligence process. The department and Compliance Officer meet regularly to review supply chain risks, approve risk mitigation strategies, and recommend corrective actions when necessary.

2.4 External contractors

To ensure the effectiveness of the Compliance Officer's work in verifying counterparties, external contractors may be engaged to support the due diligence process. These contractors assist in conducting enhanced due diligence, collecting additional documentation, and performing independent assessments where necessary. They work under the direction of the Compliance Officer, providing specialized expertise to help identify potential risks and implement appropriate risk mitigation measures.

2.5 External Auditors

Independent third-party auditors, approved by the LBMA and/or the Copper Mark, perform annual audits of the due diligence practices to ensure compliance with the RGG and/or the RRA.

2.6 Continuous Improvement Mechanism

This Procedure will be reviewed in case of changes in industry standards, regulations, and changes in the nature of suppliers and types of mined metals to ensure its effectiveness. Updated information will be shared with all stakeholders.

2.7 Grievance Mechanism

AMMC has established the grievance mechanism enabling parties across the supply chain to report any risk, complaints or other grievances, in a confidential, or if chosen, anonymous manner without fear of retaliation, punishment or discipline. An e-mail address responsible_supplychain@agmk.uz is used for this purposes. This way of communication should be publicly available (via publishing on the AMMC's web-site) and communicated to suppliers.

3. Risks and CAHRA identification procedure

3.1 Risks group

For the purposes of conducting due diligence on the supply chain, in accordance with Annex II of the OECD, and considering ESG factors, the risks associated with metals supply chains have been categorized into the following groups:

Location risk – the metals may originated from conflict-Affected and High-Risk Areas or specific locations with political instability, weak governance, sanctioned, or association with illicit activities such as conflict financing or human rights violations.

Supply Chain risk - complex supply chains involving multiple intermediaries, suppliers with questionable business practices.

Origin of mined metals - metals sourced directly from illegal mines, using child labor or causing environmental damage.

3.2 Risk Classification

3.2.1 Low Risk

For location-based low risks, the Mined metals:

- Originates from AMMC's mines or countries with stable governance and strong regulatory frameworks, where there is no history of conflict financing or significant human rights abuses.
- Sourced from regions with transparent and traceable mining operations, ensuring that the material's provenance can be verified with confidence.
- Come from mining operations that are independently certified by recognized industry standards (e.g., LBMA, Copper Mark, RMI, or equivalent).
- For supplier-based low risks, the metals-supplying counterparty or other known upstream companies:
 - Have no known association with high-risk activities, such as arms trading, money laundering, or politically exposed persons (PEPs).
 - Have not shown any discrepancies in the provided documentation, and all requests for information have been promptly fulfilled.
 - Have robust due diligence procedures in place that are independently verified by a third-party audit or certification body.

3.2.2 Medium Risk

For location-based medium risks, the Mined metals:

- Originate from, has transited or has been transported via a Conflict-Affected and High-Risk Area (CAHRAs), but the metals-supplying counterparties are intermediaries or traders with internal due diligence procedures in place but lack independent third-party verification or certification (e.g., LBMA, Copper Mark, or equivalent).

For supplier-based medium risks, the metals-supplying counterparty or other known upstream companies:

- Have internal due diligence procedures in place but lack independent third-party verification or certification (e.g., LBMA, Copper Mark, or equivalent).

3.2.3 High Risk:

For location-based high risks, the Mined metals:

- Originates from, has transited or has been transported via a Conflict-Affected and High-Risk Area (CAHRA)

- Is claimed to originate from a country through which metals from CAHRAs is known, or reasonably suspected, to transit

- Is claimed to have originated from a country that has limited known reserves, likely resources or expected production levels.

- For supplier-based high risks, the metals-supplying counterparty or other known upstream companies:

- Have shareholders, or UBOs, or other metals supplying interests in one of the location-based high-risk criteria

- Have UBOs that are Politically Exposed Persons (PEPs)

- Have activities in a higher-risk business activity such as arms, gaming and casino industry, antiques and art, and sects and their leaders

- Have been known to have sourced the metals from a high-risk country in the last 12 months

- Have material discrepancies/inconsistencies in the documentation provided or have refused to provide requested documentation.

- For type of material-based high risks, the:

- Sourced from ASM

- Produced with the use of mercury

- Contributing to catastrophic harm or highly adverse ESG factors, to the extent that the Refiner is able to identify this

3.2.4 Zero-tolerance risk:

- The metals is known to originate from areas designated as World Heritage Sites.

- The Mined or Recycled metals is known to be sourced in breach of international sanctions (including but not limited to those of the UN, EU, UK and US).

- The Mined or Recycled metals supplying counterparty, other known upstream companies or their UBOs are known money launderers, fraudsters or terrorists, or have been implicit in serious human rights abuses, or in direct or indirect support to illegitimate non-state armed groups.

- Suppliers involved in:

- any forms of torture, cruel, inhuman and degrading treatment;

- any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily

- the worst forms of child labour;

- other gross human rights violations and abuses such as widespread sexual violence;

- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

- Suppliers, who support (direct or indirect) to non-state armed groups who:

- illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;

- illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded;
- illegally tax or extort intermediaries, export companies or international traders

3.3 CAHRA identification procedure

For the purposes of this Procedure, we use the following lists to determine conflict-affected and high-risk areas:

- Heidelberg Barometer.
- EU CAHRA list

The areas included in these lists are considered as CAHRAs for the purpose of risk identification process described in section 4.

4. Risk-based due diligence

4.1 Risk identification process

The AMMC perform supply chain due diligence:

- before entering a new business relationship with a metals-supplying counterparty;
- before concluding new supply contracts, in case of a change in the country of origin and/or transportation routes;
- when receiving additional information from external sources.

4.1.1 Risk identification process for each the risk group

Procedures for location risk identification include:

- Determination of the origin of the metals source (The location of the mine (LSM and ASM)).
- Determination of the general transportation routing of the metals source from origin to the AMCC.
- Verification that sourcing from the Country of Origin is not in breach of any international sanctions.
- Verification that the mine site is not located in a World Heritage Site.
- Procedures for supplier risk identification include:
 - Identification and verification of the metals-supplying counterparty's name, physical address, corporate registration and license information, using reliable, independent source documents, data or information.
 - Identification and verification of Ultimate Beneficial Owners (UBOs) (defined as 10% or more ownership) and authorised signatories of the metals-supplying counterparty, using reliable and current government-issued photo identity documents
 - Confirmation that the metals-supplying counterparty and its UBOs are not named on any government lists as wanted money launderers, or as known fraudsters or terrorists.
 - Obtaining the metals-supplying counterparty's business and financial details, and information on the purpose and intended nature of the business relationship.

Procedures for Mined metals from LSM include obtaining, assessing and, where possible, verifying against publicly available information:

- Import/export metals licence for metals supplying counterparty, if applicable
- Mining practice, including processing and transportation method
- Production data and processing capacity, if available
- Sources of any third-party stock, including that from ASM, on the mine site and controls to appropriately manage these

- Anti-money laundering and terrorist financing policies and practices, where relevant
- Bribery and corruption policies and practices, including payment to government
- Human rights policies and practices
- Environmental policies and practices
- Health and safety policies and practices
- Labour policies and practices, if not already covered through other policies collected
- Community engagement programmes
- Ethics and business integrity policies and practices.

When identifying the criteria of High-risk, AMMC determines whether there is independent audit, assurance or certification reports of conformance with recognised responsible sourcing standards. If any, the Compliance Officer should determine whether the supplier's procedures made under other initiatives cover the identified risks.

All procedures should be documented in the LBMA's templates specified in the amendment to this Procedure.

4.1.2 Monitoring of transactions

Transactions monitoring include:

- Checking volumes, types and concentrations of metals-bearing material for consistency with previous shipments
- Monitoring the actual transportation routing for each shipment
- Verifying physical shipment against shipping/transportation documents (assays, weights, serial numbers)
- Confirming that documents and materials are consistent with each other (purchase order, goods receipt, invoice) and with the KYC information (mine capacity, origin, sources).

4.2 Responses to the identified risks

4.2.1 Low Risk

Supply chains classified as low risk will not trigger any Enhanced Due Diligence and additional risk identification process.

4.2.2 Medium Risk

Supply chains classified as medium risk will trigger additional risk identification process.

4.2.3 High-risk supply chains

Supply chains classified as high risk will trigger Enhanced Due Diligence for high-risk supply chains.

4.2.4 Zero-tolerance supply chains

Where zero-tolerance issues are identified, the AMMC does not enter a business relationship with a metals-supplying counterparty or must terminate an existing relationship immediately.

4.3 Enhanced Due Diligence and additional risk identification process

4.3.1 Additional risk identification process measures for medium-risk supply chains

Additional risk identification process for medium-risk metals supply chains include

- The supply chain verification procedures have been documented at the trader and/or supplier level
- Analysis of the applicability of the counterparty's Procedure
- Obtaining internal documents on Procedure compliance
- Confirmation of an independent audit

4.3.2 Enhanced Due Diligence measures for high-risk supply chains

4.3.2.1 Enhanced Due Diligence. On-site investigation

In the event of identifying high-risk supply chain The AMMC undertake an on-site investigation/visit at the location of the metals origin.

The on-site visit:

- Aimed at substantiating the documented KYC information
- Focused on investigating threat financing risks, and the specific supply chain due diligence findings
- Conducted before any transactions occur or, at the least, within six months of the business relationship commencing
- Conducted by competent employees or independent third-party consultants, who are free of any conflict of interest with the supplier. Everyone conducting an on-site visit must commit to reporting truthfully and accurately
- Consult relevant internal and external stakeholders, where applicable
- Fully and accurately documented in the Site Visit Report templates
- Followed up, depending on the number and severity of issues identified and documented in the improvement plans.

4.3.2.2 Enhanced Due Diligence for high-risk LSM

Enhanced Due Diligence for high-risk LSM metals supply chains include:

- Proportionate KYC on each company involved in the conflict location-based high-risk supply chain from the mine to the refinery (including metals producers, intermediaries, metals traders and exporters, and transporters).
- Understanding the nature of public or private security services provided at the mine sites and through the supply chain (including the screening and training of security personnel in line with the Voluntary Principles on Security and Human Rights).
- Considering the risks of militarisation of mine sites and transportation routes, and direct or indirect support to illegitimate non-state armed group, or public or private security forces.
- Determination of the risk of any serious human rights abuses committed by any party at mine sites, transportation routes and points where metals is traded and/or exported.
- Estimating the number of Artisanal and Small-Scale Miners (if any) on the producer's concession, and:
 - Confirming their status as legitimate ASM
 - Considering risks of metals from third-party sources unknowingly being introduced into the producer's operations
 - Considering the relationship between producer and ASM actors to identify instances of conflict or tension.
- Complete self-declaration of taxes and royalties compliance, as applicable.
- Understanding payments or compensation made to government agencies and officials, public or private security forces, or other armed groups at all points in the supply chain from extraction onwards, unless prohibited by law.
- Considering compliance with environmental, health, safety, labour, community, business integrity regulations, policies and good practices for issues identified in the initial due diligence.

4.4 The management risk strategy

4.4.1 The management risk strategy for concluded high-risk supply chains

4.4.1.1 Terminate relationship

The AMMC immediately stop refining metals where its EDD concludes that there are known instances of:

- Money laundering
- Terrorist financing
- Serious human rights abuses
- Direct or indirect support to illegitimate non-state armed groups
- Fraudulent misrepresentation of the origin of minerals.

The AMMC report such instances to the appropriate authorities and to LBMA, where applicable, and in accordance with local and international legal requirements.

4.4.1.2 Suspend relationship

The AMMC suspend refining metals where its EDD concludes that:

- There is a founded suspicion of:
 - Money laundering
 - Terrorist financing
 - Serious human rights abuses
 - Direct or indirect support to illegitimate non-state armed groups
 - Fraudulent misrepresentation of the origin of minerals
- There are reported catastrophic ESG impacts as defined in the Refiner's classification criteria.

The AMMC may resume once additional information/data refuting the preliminary suspicions or a timely and appropriate response to addressing the ESG impacts has been obtained from the supplier. This should be approved by the Compliance Officer and/or the Board Committee.

4.4.1.3 Continue relationship with improvement plan

The AMMC may continue to refine metals where the EDD is not fully satisfactory, or where it concludes that the counterparty is using reasonable and good faith efforts despite instances of:

- Bribery
- Non-fraudulent misrepresentation of the origin of minerals
- Non-compliance with taxes, fees and royalties due to government
- Material breaches of environmental, health, safety, labour and community-related local legislation, and/or ESG risks that have the high likelihood to result in highly adverse impacts.
- In this case, the AMMC require the counterparty to adopt an improvement plan, which is:
 - Devised with the AMMC's input and engagement
 - Clearly documented, including performance objectives and quantitative and/or qualitative performance measurement indicators
 - Approved by the Compliance Officer and/or the Board Committee.
 - This risk management strategy include measurable steps to be taken by the counterparty, performance monitoring, periodic reassessment of risk and regular reporting to the Board Committee.
 - Performance monitoring include:
 - Identify significant and measurable improvements towards eliminating the risk within six months from the adoption of the improvement plan.

- Define additional measures in a revised improvement plan based on the progress achieved within the first six months.

- Formally assess performance to determine that measures have been properly undertaken by the deadline (e.g., through independent audits, a follow-up on-site visit or remote review, as appropriate).

- After the six-month time frame, the AMMC should consider:

- Suspending the relationship where limited or no measurable improvement can be demonstrated, until the supplier responds to the improvement plan; or

- Terminating the relationship after failed attempts at risk mitigation and performance improvement.

The Compliance Officer and/or the Board Committee should frequently revisit the decision to continue with business relationships under the risk mitigation strategy (i.e. annually, at a minimum).

4.5 The regular reporting to the Board

The Compliance Officer should provide to the Board at least the following information each quarters:

- relevant statistics on high-risk supply chains

- counterparty under risk mitigation strategies and status of risk mitigation strategies

- reports on the progress and effectiveness of improvement plans.

Such information should be provided timely and on a regular basis. Based on current assessment of risk profiles of suppliers, the information should be provided annually before the end of the reporting period. Timing and extent of communication with the Board should be regularly reviewed for potential revision.

All data related to communication with the Board and minutes should be properly documented and stored.

4.6 Public Reporting

4.6.1 Public Reporting for RGG compliance

The Compliance Officer is responsible for preparation of Step 5 Reporting on Metals supply chain for reporting to be RGG complaint. This reporting must include:

- General provisions of the supply chain Procedure must be made publicly available.

- AMMC's Compliance Report - The Compliance Report should, as a minimum, meet the requirements outlined in the LBMA's Disclosure Guidance Document. The Compliance Report must be submitted to LBMA and made publicly available.

- Refiner's Country of Origin Annex - The Country of Origin Annex should, as a minimum, meet the requirements outlined in the LBMA's Disclosure Guidance document. The Country of Origin Annex should be submitted to LBMA.

- In addition, Compliance Officer must report any of the following to LBMA, with due consideration of local and international legal requirements:

- Zero-tolerance non-conformances identified during the AMMC's due diligence processes in suppliers or supply chains already onboarded.

- Zero-tolerance non-conformances identified during the AMMC's assurance process.

- Assurance Providers with whom the AMMC has decided to cease engagement as a result of performance issues.

- Reporting period is a period of 12 months, from 1 January to 31 December.

- Step 5 reporting must be issued by the 31 March of the following period.

- For meeting deadlines, the Compliance Officer is responsible for:

- monitoring of the RGG requirements and timely updating of the templates, Procedure and skeleton of the report;
- timely completing the required purchase procedures and signing the agreement with an auditor;
- preparation of a skeleton of the report and obtaining confirmation from the auditor before the end of the reporting period;
- preparation of a preliminary version of AMMC's Compliance Report within a month after the end of the reporting period.

The reviewed version must then be communicated to senior management (refer to section 4.5).

4.6.2 Public Reporting for RRA compliance

The Compliance Officer is responsible for preparation of reporting on Metals supply chain for assessment period to be RRA compliant. This reporting must include:

- General provisions of the supply chain Procedure must be made publicly available.
- A description of the management system designed and implemented related to the Procedure.
 - The system of control and transparency designed and implemented to collect and retain information necessary for risk identification and explain how the information collected for has strengthened the AMMC's due diligence efforts.
 - A summary of the methodology adopted and the results of the risk responses process obtained during the assessment period.
 - In addition, if high-risk suppliers are identified in assessment period the report shall describe the methodology adopted and the results of the risk assessment obtained in the assessment period, including information on the methodology and results of the on-the-ground assessment.
 - If risks of adverse impacts and/or actual adverse impacts are identified during the risk assessment, the report shall describe the strategy adopted to respond to such risks, including:
 - The risk management plan and the actions taken during the assessment period to mitigate risks of adverse impacts and/or actual adverse impacts identified, including, where relevant, the involvement of stakeholders.
 - A summary of the methodology for monitoring and evaluating the risk management plan.
 - Whether improvement was made towards eliminating the risks of adverse impacts and/or actual adverse impacts.

Assessment period is a period of 12 months, from 1 September to 31 August.

Reporting must be issued by the 31 October of the following period.

For meeting deadlines, the Compliance Officer is responsible for:

- monitoring of the RGG requirements and timely updating of the templates, Procedure and skeleton of the report;
- timely completing the required purchase procedures and signing the agreement with an auditor;
- preparation of a skeleton of the report and obtaining confirmation from the auditor before the end of the reporting period;
- preparation of a preliminary version of AMMC's Compliance Report within a month after the end of the reporting period.

The reviewed version must then be communicated to senior management (refer to section 4.5).

5. Know Your Counterparty (KYC) and Supply Chain Due Diligence Record Maintenance Requirements

5.1 Record Retention Period

Minimum Retention Period: KYC and supply chain due diligence records must be retained for a minimum period of five years. This period may be extended in cases where ongoing investigations or legal inquiries require longer retention.

Retention Beyond Five Years: In instances where a counterparty relationship or transaction is under review or subject to regulatory scrutiny, records should be maintained beyond the five-year minimum until the matter is fully resolved.

5.2 Documentation Requirements for KYC

Counterparty Identification: All KYC records must include comprehensive information to verify the identity nature and legality of all counterparties.

Ownership and Control Structure: For corporate entities, records should document the ownership and control structure, including identifying ultimate beneficial owners (UBOs) who hold significant influence or ownership in the company.

Sanctions and PEP Screening: Documentation of screenings against international sanctions lists, politically exposed persons (PEP) databases, and adverse media checks should be maintained. This includes the results of these screenings and any subsequent investigations or clarifications required due to potential red flags. Red flags are described in section 3.2.

Risk Assessment Profile: KYC records should include the risk assessment of the counterparty, detailing:

- Risk rating based on geographic location, type of business, and history of compliance,
- Justification for the assigned risk rating,
- Any enhanced due diligence (EDD) measures implemented for high-risk counterparties.

5.3 Supply Chain Due Diligence Recordkeeping

Supply Chain Maps and Origin of Metals: Comprehensive records of the metals supply chain must be maintained, including details of each link in the chain (from mines to refineries and beyond) and the origin of the metals.

5.4. Enhanced Due Diligence (EDD) Records

Documentation for High-Risk Counterparties: When enhanced due diligence (EDD) is performed for high-risk counterparties (e.g., those operating in conflict-affected or high-risk areas), detailed records of additional investigations must be maintained. These records should include:

- Additional documentation requested from the counterparty, such as proof of origin, financial statements, or external audits,
- On-site inspection or third-party audit reports,
- Risk mitigation steps taken, including any corrective action plans or decisions to reject or terminate the relationship.

• Ongoing Monitoring Records: For high-risk supply chains or counterparties, documentation of ongoing monitoring efforts should be maintained, including:

- Periodic risk assessments and updates to counterparty profiles,
- Results of ongoing transaction monitoring,
- Records of any red flags or suspicious activity reports (SARs) filed with regulatory bodies.

5.5. Auditability and Accessibility

Electronic Recordkeeping: To ensure records are easily accessible for internal or external audits, The AMMC uses secure electronic document management systems.

Audit-Ready Documentation: All records should be maintained in a format that is readily accessible for audits by internal auditors, external independent auditors, or regulatory authorities (e.g., LBMA or AML regulators). Documentation must be:

- Comprehensive, providing a clear trail of all due diligence steps taken,
- Consistent with internal procedures and external compliance requirements,
- Updated regularly to reflect ongoing due diligence efforts and any changes in the risk profile.

6. Employee Training Program for Responsible Metals Guidance (RGG)

6.1. Program Objectives

Awareness of Responsible Sourcing: To educate employees on the importance of responsible metals sourcing, including the social, environmental, and economic impacts of their work.

Understanding RGG Compliance: To familiarize employees with the RGG, its requirements, and how their roles contribute to compliance.

Risk Identification and Management: To develop skills in identifying and assessing risks related to human rights violations, environmental harm, money laundering, and conflict financing within the metals supply chain.

Implementation of Due Diligence Practices: To train employees on implementing due diligence processes, including KYC, transaction monitoring, and reporting procedures for suspicious activities.

6.2. Target Audience

The training program is tailored for various levels of employees, including:

Board and Compliance Officer: Understanding overall responsibilities and strategic importance of RGG and RRA compliance.

Procurement Staff: Focus on supply chain due diligence, risk assessment of suppliers, and responsible sourcing practices.

6.3. Training Methods

In-Person Workshops: Interactive sessions led by subject matter experts that encourage group discussions, role-playing, and problem-solving activities.

Webinars and Guest Speakers: Regularly scheduled webinars featuring industry experts and/or regulatory representatives to provide diverse perspectives on responsible sourcing.

On-the-Job Training: Practical, hands-on training for operational staff to ensure they understand and can apply compliance measures in their daily activities.

6.4 Documentation and Record Keeping

Training Records: Documentation of all training sessions, participant attendance, and assessment results to ensure accountability and compliance with regulatory requirements.

Access to Resources: Creation of a centralised repository of training materials, resources, and policies related to responsible metals sourcing that employees can access as needed.

"Tegishli tekshiruv bo'yicha tekshiruv varaqalari" (Due Diligence Checklist)

Due diligence stage	Этап проверки	Статус	Комментарии
Identify the counterparty : - Name - Address - Country of incorporation	Определите контрагента: - Имя - Адрес - Страна регистрации		
Evidence of incorporation using reliable independent source documents, data or information, such as: - Business register extract - Certificate of Incorporation - Certificate of good standing - Articles of association - Extract from reliable private database/from regulatory body database	Доказательство регистрации, используя надежные документы, данные или информацию из независимых источников, такие как: - Выписка из реестра предприятий - Свидетельство о регистрации - Сертификат о надлежащем состоянии - Устав - Выписка из надежной частной базы данных/базы данных государственного органа		
Identify the beneficial owner(s)	Определите выгодоприобретателя(ей)		
ID of ultimate beneficial owners	Идентификатор конечных выгодоприобретателей		
ID of authorized signatories	Идентификатор уполномоченных подписантов		
Screening (through reliable database such as World-Check) on: - Counterparty - Ultimate Beneficial owner(s), Other (based on risk classification)	Проверка (через надежную базу данных, такую как World-Check) на: - Контрагента - Конечного выгодоприобретателя(ей), Другое (основано на классификации риска)		
Copy of mining license(s)	Копия лицензии на добычу		
Copy of export license(s) if applicable	Копия экспортной лицензии, если применимо		
Corroborative documentation based on the risk classification such as for example: - Internet research - Annual report - Corporate social responsibility report - Group chart - References - Licenses - Certifications - Environmental Impact Assessment	Подтверждающая документация на основе классификации рисков, например: - Интернет-исследование - Годовой отчет - Отчет по корпоративной социальной ответственности - Структура группы - Рекомендации - Лицензии - Сертификаты - Оценка воздействия на окружающую среду		
Counterparty's policies and procedures, if applicable and relevant: - AML - Anti-bribery and corruption (incl. payment to government) - Human rights - Environmental - Health & Safety - Labour - Community engagement - Code of conduct - Grievance / Whistleblowing - Mining site and processing plant pictures	Политики и процедуры контрагента, если применимо и актуально: - ПОД/ФТ (Противодействие отмыванию денег) - Антикоррупция и борьба со взяточничеством (включая платежи правительству) - Права человека - Экология - Охрана здоровья и безопасность - Трудовые отношения - Взаимодействие с сообществом - Кодекс поведения - Жалобы / Информирование о нарушениях - Фотографии шахты и перерабатывающего завода		
Does the company have an environmental incident plan (incl. tailings dam failure)?	Есть ли у компании план реагирования на экологические инциденты (включая разрушение дамбы хвостохранилища)?		
Identify if the transportation route from the mine to the refinery transit is through a Conflict-Affected area?	Определите, проходит ли маршрут транспортировки от шахты до аффинажного завода через зону конфликта?		
Conducting a risk assessment.	Проведение оценки рисков		
Report visit on on-site visit conducted within 6 months of the business relationship commencing, if applicable	Отчет о посещении объекта, проведенный в течение 6 месяцев с момента начала деловых отношений, если применимо		
Screening on all companies located in conflict-related areas, in the supply chain from the mine to the AMMC	Проверка всех компаний, находящихся в зонах конфликта, в цепочке поставок от участка добычки до АГМК, если применимо		

Due diligence stage	Этап проверки	Статус	Комментарии
Self-declaration of taxes and royalties' compliance, as applicable	Самодекларация о соблюдении налогов и роялти, если применимо		
Determine the origin of the precious metals source, including the location of the mine (LSM and ASM)	Определить происхождение источника драгоценных металлов, включая расположение шахты		
Identify the general transportation routing of the precious metals source from the origin to the AMCC.	Определить общий маршрут транспортировки драгоценных металлов от места происхождения до АГМК.		
Verify that sourcing from the Country of Origin is not in breach of any international sanctions	Убедиться, что закупки из страны происхождения контрагента не нарушают международные санкции		
Confirm that the mine site is not located in a World Heritage Site.	Подтвердить, что шахта не расположена на объекте Всемирного наследия.		
Obtain the precious metals-supplying counterparty's business and financial details, as well as information on the purpose and intended nature of the business relationship.	Получить деловую и финансовую информацию о контрагенте, поставляющем драгоценные металлы, а также информацию о цели и предполагаемом характере деловых отношений.		
Assess mining practices, including processing and transportation methods.	Оценить методы добычи, включая методы переработки и транспортировки.		
Verify production data and processing capacity, if available.	Проверить производственные данные и мощности по переработке, если они доступны.		
Identify sources of any third-party stock, including that from ASM, on the mine site and verify controls to manage these sources.	В случае если поставщик является посредником, проверьте всех поставщиков данного посредника и подтвердите контроль посредника за этими поставщиками.		
Identify suppliers of ASM precious metals sources, including: Local artisanal mining team, association, or cooperative. Ore processing plant. Aggregators and traders. Local precious metals exporter.	Определить поставщиков источников драгоценных металлов, включая: Местная артель, ассоциация или кооператив. Завод по переработке руды. Агрегаторы и трейдеры. Местный экспортер драгоценных металлов.		
Assess mining practices, including extraction, processing, and transportation methods.	Оценить методы добычи, включая добычу, переработку и транспортировку.		
Evaluate the use, storage, and recovery of mercury, and its impact on the environment and the health of those involved in production.	Оценить использование, хранение и утилизацию ртути, а также её влияние на окружающую среду и здоровье участников производства.		

Kontragentlarni identifikatsiya qilish va xavf darajasini baholash “O‘z mijozingni bil” so‘rovnomasi (KYC Questionnaire)

1. Company details / Сведения о контрагенте

a. Name / Наименование компании	
b. Registered Address / Фактический адрес	
c. Business Address / Юридический адрес	
d. Phone Number / Контактный номер телефона	
e. Date of Incorporation / Дата создания компании	
f. Country of Incorporation / Страна создания компании	
g. Business Registration Number / Номер регистрации компании	
h. Tax Identification Number / Идентификационный налоговый номер	
i. VAT Number / Номер НДС	
j. If listed, indicate name of stock exchange(s) and ticker / В случае наличия у компании ценных бумаг, котирующихся на бирже, укажите наименование бирже и тикер	
k. Website / Веб-сайт компании	
l. External Financial Auditors Since Date / В случае наличия у компании внешнего аудитора, укажите наименование аудиторской организации, а также период с которого проводятся аудиторские проверки	
m. How many direct and indirect subsidiaries does the company have? (Please provide a Group chart) / В случае наличия у компании прямых или косвенных дочерних компаний, предоставьте структуру Группы	
n. Contact Person of the Company / Контактное лицо компании	
o. Has the Company, its ultimate beneficial owner(s) or member of top management been subject to legal proceedings or under investigation by national or international authorities (past 5 years/current)? Please describe / Подвергались ли Компания, ее конечный бенефициарный владелец(ы) или член высшего руководства судебному разбирательству или расследованию со стороны национальных или международных органов в течении последних 5 лет или в текущем году? Если да, то пожалуйста, опишите	

2. Main activity / Сведения о виде деятельности

a. Type of Business / Вид деятельности	<input type="checkbox"/> Large scale mine (>100'000 oz/year) / Крупная горнодобывающая компания (более 100'000 унций в год) <input type="checkbox"/> Metals trader / Трейдер металлов <input type="checkbox"/> Medium scale mine (30'000 - 100'000 oz/year) / Средняя горнодобывающая компания (30'000 - 100'000 унций в год) <input type="checkbox"/> Industrial Small scale mine (<30'000 oz/year) / Малая горнодобывающая компания (менее 30'000 унций в год) <input type="checkbox"/> Others, please specify / Прочее, просьба уточнить:
b. In which countries do the Company currently refine metals? / В каких странах Компания в настоящее время перерабатывает металлы?	

3. Beneficial owners / Сведения о собственниках. Участники с долей более 10%

Percentage Holding (%) / Процентная доля	Name / Наименование (Имя Фамилия)	Address / Адрес	Country of Incorporation/ Nationality(ies) / Страна создания / Национальность	Date of Incorporation/ Date of Birth / Дата регистрации / Дата рождения

4. ULTIMATE BENEFICIAL OWNER (SHAREHOLDERS(S) MORE THAN 10% - INDIVIDUAL ONLY) / Сведения о конечных бенефициарах. Бенефициары с долей более 10%

Percentage Holding (%) / Процентная доля	Name / Наименование (Имя Фамилия)	Address / Адрес	Country of Incorporation/ Nationality(ies) / Страна создания / Национальность	Date of Incorporation/ Date of Birth / Дата регистрации / Дата рождения	PEP Status (YES/NO) / Бенефициар является политически значимым лицом (Да/Нет)

5. FINANCIAL INFORMATION / Финансовая информация

5.1 Financial statements details / Данные финансовой отчетности (Предоставьте финансовую отчетность за последний отчетный период)

	Currency / Валюта	Last Reporting Period / значение на последнюю отчетную дату	Previous Year / значение на предыдущую отчетную дату
a.Total Shareholder's Equity / Размер капитала			
b.Turnover / Обороты компании (выручка)			

5.2 Other Financial Information / Прочая финансовая информация (Предоставьте финансовую отчетность за последний отчетный период)

<p>c. Source of mining operation funding / Источник финансирования добывающих работ</p>	<p><input type="checkbox"/> Government entity, name(s) / Государственное финансирование: _____</p> <p><input type="checkbox"/> Bank loan, name(s) / Банковский займ: _____</p> <p><input type="checkbox"/> Other third-party loan, name(s) / Займ от третьих сторон: _____</p>
<p>d. What usual payment method does the Company use to pay its suppliers (percentage)? Какой обычный способ оплаты использует Компания для платежей поставщикам (доля)?</p>	<p>Bank transfers / Банковские переводы ____</p> <p>Checks / Чеки ____</p> <p>Cash / Денежные средства ____</p>

6 . REGULATORY FRAMEWORK / Соблюдение законодательства

	Yes / Да	No / Нет	N/a / Н/п
<p>a. Does your Company need to comply with the following regulations in the country/province of operations?</p> <ul style="list-style-type: none"> • Health and safety • Environmental • Labour • Anti-bribery & corruption <p>/</p> <p>Должна ли компания соблюдать следующие нормативные акты в стране, где происходит добыча драгоценных металлов?</p> <ul style="list-style-type: none"> • Охрана труда и техника безопасности • Окружающая среда • Труд • Борьба со взяточничеством и коррупцией 			
<p>b. Is child labour regulated in mining activity in the country/province of operations? / Регулируется ли детский труд в горнодобывающей промышленности в стране, где происходит добыча драгоценных металлов?</p>			

<p>c. Has your Company been fined or prosecuted for a breach to the following regulations in the country/province of operations during the last two years?</p> <ul style="list-style-type: none"> • Health and safety • Environmental • Labour • Human rights • Anti-bribery & Corruption • Taxes <p>/</p> <p>Была ли Компания оштрафована или привлечена к ответственности за нарушение следующих нормативных актов в стране, где происходит добыча драгоценных металлов, в течение последних двух лет?</p> <ul style="list-style-type: none"> • Охрана труда и техника безопасности • Окружающая среда • Труд • Права человека • Борьба со взяточничеством и коррупцией 			
<p>If yes, please describe how it has been mitigated / Если да, пожалуйста, опишите, как были урегулированы выявленные нарушения</p>			
<p>d. Is the mining site(s)/processing plant legally required to hold a mining/operational license? Please provide a copy of the mining license /</p> <p>Обязана ли Компания иметь лицензию на добычу драгоценных металлов / эксплуатацию рудника? Please provide a copy of a license / Пожалуйста, предоставьте копию такой лицензии</p>	<p><input type="checkbox"/> Yes / Да <input type="checkbox"/> No / Нет Date of issue / Дата выдачи лицензии : _____ Expiry date / Срок действия: _____</p>		
<p>e. Is the mining site(s) legally required to hold an environmental license? Please provide a copy of the environmental license / Требуется ли Компании иметь экологическую лицензию в стране, где происходит добыча драгоценных металлов? Пожалуйста, предоставьте копию экологической лицензии</p>	<p><input type="checkbox"/> Yes / Да <input type="checkbox"/> No / Нет Date of issue / Дата выдачи лицензии : _____</p>		
<p>f. Did the Regulator responsible for mining operations carry out an on-site visit / Проводил ли Регулирующий орган, ответственный за добычу полезных ископаемых, выездную проверку рудников, используемых для добычи драгоценных металлов?</p>			
<p>g. If no on-site visit has yet been performed (question above), is there any visit planned? / Если выездная проверка еще не проводилась (вопрос выше), планируется ли какая-либо проверка?</p>	<p><input type="checkbox"/> Yes, date of planned visit / Да, укажите дату проверки: _____ <input type="checkbox"/> No / Нет</p>		

<p>h. Is your Company legally required to have a license to export precious metals? / Обязана ли Компания иметь разрешение на экспорт драгоценных металлов?</p>	<p><input type="checkbox"/> Yes – Please provide a copy / Да, Просьба предоставить копию Date of issue / Дата выдачи: _____ Expiry date / Срок действия: _____ <input type="checkbox"/> No / Нет <input type="checkbox"/> N/A / Не применимо</p>
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7. GOVERNMENT PAYMENTS / Выплаты государству

<p>a. Please describe the framework relating to tax/fees/royalties paid to government agencies and officials (taxes on the extraction, trade, transport and export of gold and/or silver) / Пожалуйста, опишите систему, налогообложения и платежей, выплачиваемых государственным учреждениям и должностным лицам и связанным с добычей драгоценных металлов.</p>	
<p>b. Does your Company make financial and in-kind political contributions, whether directly or through an intermediary? / Делает ли Компания финансовые взносы и взносы в натуральной форме на политические цели, напрямую или через посредника?</p>	<p><input type="checkbox"/> Yes / Да <input type="checkbox"/> No / Нет</p>
<p>If yes, does your Company has a policy on that matter? / Если да, есть ли у вас какая-либо политика, регулирующая данные выплаты?</p>	<p><input type="checkbox"/> Yes / Да <input type="checkbox"/> No / Нет</p>
<p>c. Does your Company apply the Extractive Industries Transparency Initiative (EITI) guidelines? / Применяет ли Компания стандарты Инициативы прозрачности добывающих отраслей?</p>	<p><input type="checkbox"/> Yes / Да <input type="checkbox"/> No / Нет</p>

8. HUMAN RESOURCES / Кадровая политика

<p>a. Number of employees within the Company / Количество сотрудников в Компании</p>	
<p>b. Number of employees within the Group / Количество сотрудников в Группе</p>	

<p>c. What practices have been put in place in Company's work force to:</p> <ul style="list-style-type: none"> • ensure inclusion (for e.g., gender, ethnicity, religion, etc) • prevent bullying, harassment and discrimination • ensure fair remuneration compared to relevant national and local benchmarks, norms and regulation • limit working hours <p>Please provide relevant policies covering these topics / Какие политики были внедрены в Компании в отношении работников для:</p> <ul style="list-style-type: none"> • обеспечения интеграции (например, по признаку пола, этнической принадлежности, религии и т.д.) • предотвращения травли, домогательств и дискриминации • обеспечения справедливой оплаты труда по сравнению с соответствующими национальным законодательством • ограничения рабочего времени <p>Пожалуйста, предоставьте соответствующие правила, охватывающие эти темы</p>	
<p>d. Does your Company have a code of conduct on business integrity and ethical conduct? Please provide a copy / Есть ли у вас кодекс деловой этики? Пожалуйста, предоставьте копию</p>	
<p>e. Is freedom of association or collective bargaining allowed within the Company? / Разрешены ли в Компании свобода объединений или ведение коллективных переговоров?</p>	
<p>f. Does your Company have a fair, accessible, effective and timely grievance mechanism in place for workers? Please describe / Есть ли у вас справедливый, доступный, эффективный и своевременный механизм рассмотрения жалоб для работников? Пожалуйста, опишите</p>	
<p>g. Does your Company have employees under the age of 18 in the hazardous mining operations? / Есть ли у вас работники моложе 18 лет, занятые на опасных работах в рудниках?</p>	
<p>h. Does your company</p> <ul style="list-style-type: none"> • offer free access to all employees appropriate Personal Protective Equipment (PPE) • provide regular documented Health & Safety training • offer to all employees health monitoring and screening to prevent workplace illness <p>/ Предоставляет ли Компания</p> <ul style="list-style-type: none"> • всем сотрудникам бесплатный доступ к соответствующим средствам индивидуальной защиты (СИЗ) • проводит регулярные документированные тренинги по охране труда • предлагает всем сотрудникам мониторинг состояния здоровья и скрининг для предотвращения заболеваний на рабочем месте 	
<p>i. Does the Company use accident rate as a Key Performance Indicator? / Использует ли Компания уровень аварийности в качестве ключевого показателя эффективности?</p>	
<p>j. What is the past 12 months record on accident rate? / Каков показатель аварийности за последние 12 месяцев?</p>	

9. ORIGIN OF PHYSICAL PRECIOUS METALS, CAPACITY AND MINING PRACTICES / Сведения об участках, которые используются для добычи металлов

<p>a. From how many mining site(s) is the metals extracted? / На скольких рудниках добываются металлы?</p>	
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b. Name of the mining site(s) / Название участка (ов) добычи полезных ископаемых:	
c. Where exactly is the mining site(s) located (country, province, closest city, GPS coordinates)? / Где именно находится объект(ы) добычи драгоценных металлов (страна, регион, ближайший город, координаты GPS)?	
d. In which perimeter (km) around the centre of operation/processing plant is the mining site(s) located? / В каком периметре (км) вокруг центра эксплуатации / обогатительной фабрики расположен участок (ы) добычи полезных ископаемых?	
e. What is the daily production of the mining site(s)? / Какова ежедневная добыча на участке (участках)?	
f. What are the estimated reserves of the mining sites(s)? / Каковы предполагаемые запасы участков добычи драгоценных металлов?	
g. Is your Company operating an open pit or an underground mine? / Эксплуатируете ли вы открытый карьер или подземную шахту?	
h. What is the metals extraction method (mining equipment & methods)? / Какие методы добычи используются на участке (опишите методы и используемое оборудование)?	
i. Does the mine source from artisanal miners on its concession? / Приобретает ли Компания руду от индивидуальных старателей, осуществляющих добычу на участке на основе концессионного соглашения?	<input type="checkbox"/> Yes, please describe / Да, просьба описать: <input type="checkbox"/> No / Нет
j. Does the mine source ore or doré from mines outside its concession? / Получает ли Компания руду из рудников, находящихся за пределами ее концессии?	<input type="checkbox"/> Yes, Name and location of the mine / Да, наименование и локация такого рудника :

10. PROCESSING PLANT / Сведения о процессе производства

a. Where exactly is the metals processing plant(s) located (country, province, closest city, GPS coordinate)? / Где именно расположены предприятия по переработке металлов (страна, регион, ближайший город, GPS-координаты)?	
b. Is the metals processing plant held by the mining company or is it outsourced to an external party? / Находится ли завод по переработке металлов в собственности Компании или процесс обработки передан на аутсорсинг сторонней организации?	<input type="checkbox"/> Mining company processing plant / Завод находится в собственности Компании <input type="checkbox"/> Metal processing outsourced to an external plant / Процесс обработки передан на аутсорсинг сторонней организации
c. If the Mining Company has its own processing plant, does it also source mined gold and /or silver for processing from external parties? / Если у Компании есть собственное перерабатывающее предприятие, получает ли Компания также добытые металлы для переработки от внешних сторон?	<input type="checkbox"/> Yes Name and location of mining sites / Да, наименование компаний поставщиков и местонахождение ее рудников: _____ <input type="checkbox"/> No / Нет
d. What is metals processing method (processing equipment & methods)? / Каков метод обработки золота и/или серебра (оборудование и методы обработки)?	
e. What chemical products are used during processing? / Какие химические продукты используются при переработке?	<input type="checkbox"/> Mercury / Ртуть <input type="checkbox"/> Cyanide / Цианид <input type="checkbox"/> Others, please specify / Прочее, просьба описать: _____

f. Does your Company have practices in place to properly manage transportation, handling, storage and disposal of all hazardous materials? / Опишите подходы Компании к организации процессов транспортировки, обработки, хранения и утилизации всех потенциально опасных веществ?	
g. If cyanide is used, is the transportation, storage, use and disposal in line with the International Cyanide Management Code? / Если используется цианид, соответствуют ли его транспортировка, хранение, использование и утилизация Международным правилам обращения с цианидами?	Yes / Да <input type="checkbox"/> Plan to comply / Планируйте соблюдать <input type="checkbox"/> No / Нет <input type="checkbox"/>
h. What is the capacity of the processing plant per day? / Какова производительность перерабатывающего завода в сутки?	

11. MATERIALS / Продукция

a. What type of metals is the Company planning to send for refining? / Какие металлы Компания планирует отправлять на аффинаж?	
b. What is the form of metals planned to be sent for refining? / В каком виде металлы планируется отправить на аффинаж?	

12. COMMUNITY ENGAGEMENT / Взаимодействие с сообществами в регионах участков добычи

a. Does your Company have Community Engagement Programs (incl. for vulnerable or marginalised groups)? / Есть ли у вас политика взаимодействия с сообществами (в т.ч. для уязвимых или маргинализированных групп)? Does your Company has a person responsible for Community Relationship? / Укажите наличие сотрудника, отвечающего за связи с общественностью?	
b. Has there been any issue with the Community over the past 24 months? If yes, please describe and provide information on how it has been mitigated / Возникали ли какие-либо проблемы с местными сообществами за последние 24 месяца? Если да, пожалуйста, опишите и предоставьте информацию о том, как они были устранены	
c. What are the positive impacts on mining activities on the community (incl. women, children, Indigenous Peoples and other potentially vulnerable or marginalised groups)? / Каково положительное влияние деятельности по добыче драгоценных металлов на местные сообщества (включая женщин, детей, коренные народы и другие потенциально уязвимые или маргинализированные группы)	
i. Does your Company have a fair, accessible, effective and timely stakeholders' grievance mechanism in place? / Существует ли у вас справедливый, доступный, эффективный и своевременный механизм рассмотрения жалоб заинтересованными сторонами?	<input type="checkbox"/> Yes, please describe / Да, просьба описать: <input type="checkbox"/> No / Нет

<p>j. Is your Company or has your Company had to resettle local communities? If yes, have you proceeded on the following basis: -consultation with affected communities -restoration of established livelihoods -provision of fair and timely compensation Please describe / Вы переселяете или были вынуждены переселять местные общины? Если да, то действовали ли вы следующим образом: - консультации с пострадавшими общинами - восстановление устоявшихся источников средств к существованию -предоставление справедливой и своевременной компенсации Пожалуйста, опишите</p>	
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13. SECURITY (MINING SITE / PROCESSING PLANT) / Обеспечение безопасности добычи и производства

<p>a. What are the security methods used at the mining site? / Какие методы безопасности используются на месте добычи полезных ископаемых?</p>	<p>Internal Private security force / Внутренняя служба безопасности Outsourced security force / Внешняя служба безопасности Public security force – if yes (use of public forces), Is there a Memorandum of Understanding in line with UN Voluntary Principles on Security and Human Rights in place? / Правительственные силы, если да (использование правительственных сил), применяется ли Меморандум о взаимопонимании в соответствии с Добровольными принципами ООН в области безопасности и прав человека?</p>
<p>b. Are the security guards armed? / Вооружена ли служба безопасности?</p>	<p><input type="checkbox"/> Yes, please describe / Да, просьба описать: <input type="checkbox"/> No / Нет</p>
<p>c. What kind of training has the security personnel received? Is it in line with the UN Voluntary Principles on Security and Human Rights? / Какую подготовку прошли сотрудники службы безопасности? Соответствует ли это добровольным принципам ООН в области безопасности и прав человека?</p>	
<p>d. Are there any armed groups stationed near the mine site (other than security provider)? If yes, please provide information as to the reason / Есть ли какие-либо вооруженные группы, дислоцированные вблизи участка добычи драгоценных металлов (кроме охранных организаций)? Если да, пожалуйста, укажите причину</p>	<p><input type="checkbox"/> Yes / Да <input type="checkbox"/> State Armed group / Правительственная армия <input type="checkbox"/> Non-State Armed Group / Неправительственные вооруженные группировки <input type="checkbox"/> Public or private security forces / Общественные или частные вооруженные силы _____ _____ <input type="checkbox"/> No / Нет</p>

14. TRANSPORTATION / Транспортировка

<p>a. How is the ore transported from the mining sites to the processing plant? / Как транспортируется руда с мест добычи на обогатительную фабрику?</p>	<p><input type="checkbox"/> By your own company / Собственными силами <input type="checkbox"/> By a third party (external company), which company? / Третьими сторонами, укажите название _____</p>
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<p>b. How is the doré transported from the processing plant to the export location? / Как осуществляется транспортировка руды с завода по переработке до места экспорта?</p>	<p><input type="checkbox"/> By your own company / собственными силами</p> <p><input type="checkbox"/> Truck / Грузовые автомобильные перевозки</p> <p><input type="checkbox"/> Helicopter / Вертолетом</p> <p><input type="checkbox"/> Armoured vehicle / Бронемшины</p> <p><input type="checkbox"/> Fixed wing aircraft / Авиaperезовки</p> <p><input type="checkbox"/> Others, please specify / Прочее / просьба описать _____</p> <p><input type="checkbox"/> By a third party (external company), which company? / Третьими сторонами, укажите название _____</p> <p><input type="checkbox"/> Truck / Грузовые автомобильные перевозки</p> <p><input type="checkbox"/> Helicopter / Вертолетом</p> <p><input type="checkbox"/> Armoured vehicle / Бронемшины</p> <p><input type="checkbox"/> Fixed wing aircraft / Авиaperезовки</p> <p><input type="checkbox"/> Others, please specify / Прочее / просьба описать: _____</p>
<p>c. How will the doré be transported from the export location to the refinery? / Как будет осуществляться транспортировка руды с места экспорта на афинажный завод?</p>	<p><input type="checkbox"/> By your own company / собственными силами</p> <p><input type="checkbox"/> Aircraft / Авиaperезовки</p> <p><input type="checkbox"/> Boat / Морские перевозки</p> <p><input type="checkbox"/> Armoured vehicle / Бронемшины</p> <p><input type="checkbox"/> Others, please specify / Прочее / просьба описать: _____</p> <p><input type="checkbox"/> By a third party (external company), which company? / Третьими сторонами, укажите название _____</p> <p><input type="checkbox"/> Aircraft / Авиaperезовки</p> <p><input type="checkbox"/> Boat / Морские перевозки</p> <p><input type="checkbox"/> Armoured vehicle / Бронемшины</p> <p><input type="checkbox"/> Others, please specify / Прочее /</p>
<p>d. Is there any military/police checkpoint along the road from the mining site until the export location? / Есть ли какой-нибудь военный / полицейский контрольно-пропускной пункт вдоль дороги от места добычи до места вывоза?</p>	<p><input type="checkbox"/> Yes</p> <p>If yes, how many and for what purpose? / Да, для каких целей размещены и их количество _____</p> <p><input type="checkbox"/> No / Нет</p>

<p>a. Did your company establish a responsible supply chain of gold and/or silver from conflict-affected and high-risk areas policy which is consistent with the standards set forth in the model supply chain policy in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas? / Разработала ли Компания политику ответственных поставок золота и/или серебра из районов, затронутых конфликтом, и районов с высоким уровнем риска, которая соответствует стандартам, изложенным в типовой политике цепочки поставок, приведенной в приложении II к Руководству ОЭСР по проведению надлежащей проверки для ответственных поставок полезных ископаемых из районов, затронутых конфликтом, и районов с высоким уровнем риска?</p>	<p><input type="checkbox"/> Yes – Please provide a copy / Да, предоставьте копию <input type="checkbox"/> No / Нет</p>
<p>b. Does your company comply or plan to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas? / Соблюдает ли ваша компания или планирует ли соблюдать Руководящие принципы ОЭСР по ответственным цепочкам поставок полезных ископаемых из районов, затронутых конфликтами, и районов повышенного риска?</p>	
<p>c. Does your company comply with any of the following industry initiatives? / Соблюдает ли ваша компания какие-либо из следующих отраслевых инициатив?</p>	<p><input type="checkbox"/> RJC Chain of Custody Standard <input type="checkbox"/> RJC Code of Practices <input type="checkbox"/> WGC Conflict Free Gold Standard <input type="checkbox"/> WGC Responsible Gold Mining Principles <input type="checkbox"/> Fairtrade Standard <input type="checkbox"/> Fairmined Standard <input type="checkbox"/> International Council on Mining and Metals <input type="checkbox"/> Extractive Sector Transparency Measures Act (ESTMA) <input type="checkbox"/> Others, please specify: _____ Please provide copy of certification</p>
<p>d. Does your Company have a Human Right Policy in place? If yes, please provide a copy / Существует ли у вас политика в области соблюдения прав человека? Если да, пожалуйста, предоставьте копию</p>	

<p>a. At what stage is the Company in Company's greenhouse gas emissions (ex:carbon dioxide, methane, nitrous oxide, F-gases, etc) reduction journey? i.e.: Scope 1: Direct GHG emissions that occur from sources that are owned or controlled by the company, for example,emissions from combustion in owned or controlled boilers,furnaces, vehicles, etc.; emissions from chemical production in owned or controlled process equipment.</p> <p>Scope 2: Electricity indirect GHG emissions and accounts for GHG emissions from the generation of purchased electricity consumed by the company.</p> <p>Scope 3: Other indirect GHG emissions that are a consequence of the activities of the company but occur from sources not owned or controlled by the company. Some examples of scope 3 activities are extraction and production of purchased materials; transportation of purchased fuels; and use of sold products and services.</p> <p>If applicable, what are your current greenhouse gas emissions (for Scope 1 and 2 of the GHG Protocol)? Please report in metric tons of carbon dioxide equivalent (tCO2e)</p> <p>Has your Company set targets to reduce Comapny's GHG emission in Scope 1 and 2? If yes, please list each target. If no, does Company plan on doing so in the next five years</p>	<p><input type="checkbox"/> Not started</p> <p><input type="checkbox"/> Internal reflection</p> <p><input type="checkbox"/> Evaluation of our current GHGemission (Scope 1 and 2)</p> <p><input type="checkbox"/> Evaluation of your GHGemission (Scope 1, 2,3)</p> <p><input type="checkbox"/> Target setting</p>
<p>b. Is the mining site located in a water-stressed area?</p> <p>If yes, have you taken proportionate and practicable steps tomanage efficiency of your water usage. / Находится ли место добычи драгоценных ископаемых в регионе с ограниченным доступом к пригодной для использования воде? Если да, то опишите предпринятые Компанией шаги для повышения эффективности потребления воды</p>	
<p>c. Does your company have a mine closure plan in place; including:</p> <ul style="list-style-type: none"> • rehabilitation of land • preservation of water sources • prevention of land pollution <p>/</p> <p>Имеется ли в Компании план закрытия рудника, включающий:</p> <ul style="list-style-type: none"> • восстановление земель • сохранение водных источников • предотвращение загрязнения земель 	
<p>d. Does your company have a biodiversity management plan to ensure that there is at least no net loss of critical habitat? / Есть ли у вашей компании план управления биоразнообразием, гарантирующий, по крайней мере, отсутствие чистой потери критически важной среды обитания?</p>	
<p>e. Does your Company have an environmental incident plan (incl.tailings dam failure)? / Есть ли у Компании план действий в связи с экологическими происшествиями (включая аварию на хвостохранилище)?</p>	
<p>k. Are the mining site(s) located close to a World Heritage Site? / Расположены ли участки добычи драгоценных металлов близко к объектам Всемирного наследия?</p>	
<p>l. Are the mining site(s) located in a Protected Area?(source: protected planet - https://www.iucn.org) / Находятся ли места добычи полезных ископаемых на охраняемой территории? (См. - https://www.iucn.org)</p>	

a. Is your company subject to Anti-MoneyLaundering/Combating financial terrorism Law/Regulation? / Подпадает ли ваша компания под действие Закона о борьбе с отмыванием денег/финансовым терроризмом?	<input type="checkbox"/> Yes – Please fill in the Wolfsberg questionnaire attached / Да, Просьба заполнить, опросник в приложении <input type="checkbox"/> No / Нет
b. Name of the AML-CFT Law/Regulation / Название закона/нормативного акта в области ПОД/ФТ	
c. Name of the Regulator / Название реуглирующего органа	
d. Did your company establish a conformity program that contains AML/CFT policies and procedures, according to internal & international laws, rules and standards? / Разработала ли компания программу соответствия, содержащую политику и процедуры в области ПОД/ФТ, в соответствии с внутренними и международными законами, правилами и стандартами?	<input type="checkbox"/> Yes – Please provide a copy / Да, Просьба предоставить копию <input type="checkbox"/> No / Нет

18. ANTI-BRIBERY POLICY / Антикоррупционная политика

a. Does your Company have an anti-bribery policy in place? / Существует ли в Компании политика борьбы с коррупцией/взятничеством?	<input type="checkbox"/> Yes – Please provide a copy / Да, Просьба предоставить копию <input type="checkbox"/> No / Нет
b. Has the company or the Senior Management ever been charged for violation of applicable anti-bribery laws or regulations? / Привлекались ли когда-либо к ответственности компания или высшее руководство за нарушение применимых законов или нормативных актов по борьбе со взяточничеством?	<input type="checkbox"/> Yes – Please provide a copy / Да, Просьба предоставить копию <input type="checkbox"/> No / Нет

19 Authorised Signatories – Please provide ID copies/ Уполномоченные представители контрагента (Просьба предоставить копии документов, подтверждающих личных)

First Name / Имя:	Last Name / Фамилия:	Signature Specimen / Образец подписи:
Position / Должность:	Signatory Right / Право подписи: <input type="checkbox"/> Joint <input type="checkbox"/> Individual	

I/we hereby declare that the information given above is true and accurate as of the date of writing. / Настоящим я/мы заявляем, что приведенная выше информация является достоверной и точной на дату написания.

I/we undertake to automatically and promptly inform the refinery of any material changes. / Я/мы обязуемся автоматически и оперативно информировать АГМК о любых существенных изменениях.

Signature / Подпись:

Print Name / Расшифровка:

Title / Должность:

Company Name / Название компании

Date and Location / Дата и место:

Wolfsberg Anti-Money Laundering Questionnaire / Опросник по ПОД/ФТ

Corporate Name / Название компании:

Location / Место :

If you answer “no” to any question, please ensure that an explanation and additional information is supplied at the end of the relevant section / Если вы ответили “нет” на какой-либо вопрос, пожалуйста, убедитесь, что объяснение и дополнительная информация приведены в конце соответствующего раздела

1. General AML Policies, Practices and Procedures / Общие правила ПОД/ФТ

	Yes	No
1. Is the AML compliance program approved by the Corporate's board or a senior committee? / Утверждена ли программа по соблюдению требований в области борьбы с отмыванием денег правлением или комитетом высшего звена?		
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? / Существует ли в Компании программа соблюдения правовых и нормативных требований, включающая назначенного сотрудника по соблюдению требований, ответственного за координацию и надзор за системой борьбы с отмыванием денег		
3. Has the Corporate developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions? / Разработала ли Компания политику, документирующую применяемые ею процессы предотвращения, обнаружения подозрительных транзакций и сообщения о них?		
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? / В дополнение к проверкам со стороны государственных надзорных органов, есть ли у корпоративного клиента служба внутреннего аудита или другая независимая третья сторона, которая на регулярной основе оценивает политику и практику борьбы с отмыванием денег?		

<p>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). / Существует ли в Компании политика, запрещающая счета/отношения с банками-прослойками? (Банк-прослойка - это банк, зарегистрированный в юрисдикции, в которой у него нет физического присутствия, и который не связан с регулируемой финансовой группой).</p>		
<p>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? / Существует ли в Компании политика, позволяющая разумно гарантировать, что она не будет проводить транзакции с банками-прослойками или осуществлять операции от их имени через какие-либо из своих счетов или продуктов?</p>		
<p>7. Does the Corporate have policies covering relationships with politically exposed persons (PEP's), their family and close associates? / Существует ли в компании политика, регулирующая отношения с политически значимыми лицами (PEP), их семьями и близкими сотрудниками?</p>		
<p>8. Does the Corporate have record retention procedures that comply with applicable law? / Существуют ли в Компании процедуры по хранению документации, соответствующие применимому законодательству?</p>		
<p>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? / Требуется ли Компании, чтобы ее политика и практика борьбы с отмыванием денег применялись ко всем филиалам и дочерним компаниям компании как в стране происхождения, так и за ее пределами?</p>		

2. Risk Assessment / Оценка риска

	Yes	No
<p>10. Does the Corporate have a risk-based assessment of its customer base and their transactions? / Проводит ли Компания оценку своей клиентской базы и их операций на основе анализа рисков?</p>		

<p>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? / Определяет ли Компания надлежащий уровень проверки, необходимый для тех категорий клиентов и операций, которые, по мнению Компании, представляют повышенный риск незаконной деятельности внутри Компании или при ее участии?</p>		
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3. KYC, Due Diligence and Enhanced Due Diligence

	Yes	No
<p>12. Has the Corporate implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions? / Внедрила ли Компания процессы идентификации тех клиентов, от имени которых она ведет счета или осуществляет операции?</p>		
<p>13. Does the Corporate have a requirement to collect information regarding its customers' business activities? / Обязана ли Компания собирать информацию о коммерческой деятельности своих клиентов?</p>		
<p>14. Does the Corporate assess its FI customers' AML policies or practices? / Оценивает ли Компания политику или практику своих клиентов в области борьбы с отмыванием денег?</p>		
<p>15. Does the Corporate have a process to review and, where appropriate, update customer information relating to high risk client information? / Существует ли в Компании процесс проверки и, при необходимости, обновления информации о клиентах, относящейся к информации о клиентах с высокой степенью риска?</p>		
<p>16. Does the Corporate have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information? / Существуют ли в Компании процедуры для ведения учета каждого клиента с указанием его соответствующих документов, удостоверяющих личность, и получения информации о процедуре "Знай своего клиента"?</p>		
<p>17. Does the Corporate complete a risk-based assessment to understand the normal and expected transactions of its customers? / Проводит ли Компания оценку рисков, основанную на анализе, чтобы понять, какие операции являются обычными и ожидаемыми для ее клиентов?</p>		

4. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds / Выявление сомнительных транзакций и сообщение о них

	Yes	No
18. Does the Corporate have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities? / Существует ли у Компании политика или практика идентификации операций и представления отчетности о них, о которых необходимо сообщать властям?		
19. Where cash transaction reporting is mandatory, does the Corporate have procedures to identify transactions structured to avoid such obligations? / В тех случаях, когда отчетность по кассовым операциям является обязательной, существуют ли в Компании процедуры идентификации операций, структурированные таким образом, чтобы избежать таких обязательств?		
20. Does the corporate screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? / Проверяет ли Компания клиентов и транзакции по спискам физических и юридических лиц или стран, составленным правительством/компетентными органами?		
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? / Существует ли у Компании политика, позволяющая разумно гарантировать, что она работает только с банками-корреспондентами, имеющими лицензии на осуществление деятельности в своих странах происхождения?		

5. Transaction Monitoring / Мониторинг транзакций

	Yes	No
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. / Существует ли в Компании программа мониторинга необычных и потенциально подозрительных действий, которая охватывает переводы денежных средств и денежные инструменты, такие как дорожные чеки, денежные переводы, и т.д.		

6. AML Training / Тренинги по ПОД/ФТ

	Yes	No
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? / Проводит ли Компания обучение по борьбе с отмыванием денег для соответствующих сотрудников, которое включает в себя идентификацию и отчетность о транзакциях, о которых необходимо сообщать государственным органам, примеры различных форм отмывания денег, связанных с продуктами и услугами Компании, и внутреннюю политику по предотвращению отмывания		
24. Does the Corporate retain records of its training sessions including attendance records and relevant training materials used? / Хранит ли Компания записи о своих учебных занятиях, включая записи о посещении и соответствующие используемые учебные материалы?		
25. Does the Corporate communicate new AML related laws or changes to existing AML related policies or practices to relevant employees? / Доводит ли Компания до сведения соответствующих сотрудников новые законы, касающиеся борьбы с отмыванием денег, или изменения в существующих политиках или практике, связанных с отмыванием денег?		
26. Does the Corporate employ third parties to carry out some of the functions of the Corporate? / Нанимает ли Компания третьих лиц для выполнения некоторых своих функций?		

27.If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes:

- Identification and reporting of transactions that must be reported to government authorities;
- Examples of different forms of money laundering involving the Corporate's products and services
- Internal policies to prevent money laundering /

Если ответ на вопрос 26 утвердительный, проводит ли ФИ обучение по борьбе с отмыванием денег для соответствующих третьих сторон, которое включает:

- Идентификация операций и отчетность о них, которые должны быть доведены до сведения государственных органов;
- Примеры различных форм отмывания денег, связанных с продуктами и услугами Компании
- Внутренняя политика по предотвращению отмывания денег

Joyiga chiqib o'rganish tartibi "Obyektga tashrif hisoboti" (Site Visit Report)

COMPANY INFORMATION	ИНФОРМАЦИЯ О КОМПАНИИ	Ответ	Комментарии
Company Name	Название компании		
Name of the mine	Название шахты		
Location of the mine Town	Местоположение шахты (город) Region (Регион) Country (Страна)		
How did you get to the mine site?	Как вы добрались до шахты?		
Name of the mine site operator if not a wholly owned subsidiary	Название оператора шахты, если это не полностью дочерняя компания		

GOVERNANCE	УПРАВЛЕНИЕ	Ответ	Комментарии
Has your Company been fined or prosecuted for a breach of the local regulations during the last two years?	Была ли ваша компания оштрафована или подвергнута судебному преследованию за нарушение местных норм в течение последних двух лет?		
Does the company ensure provision of fair remuneration to all employees?	Обеспечивает ли компания справедливое вознаграждение для всех сотрудников?		
How much is the minimum salary in comparison with the benchmark?	Какова минимальная заработная плата по сравнению с эталонным уровнем?		
Has the company signed up to relevant industry codes of conduct (e.g., WGC, ICMM, EITI)?	Присоединилась ли компания к соответствующим отраслевым кодексам поведения (например, WGC, ICMM, EITI)?		
If yes, how are these commitments verified?	Если да, как проверяется соблюдение этих обязательств?		
Have the local authorities performed an on-site visit in the past 12 months?	Проводили ли местные власти проверку на месте в течение последних 12 месяцев?		
Is a visit by local authorities planned in the next 12 months?	Планируется ли визит местных властей в течение следующих 12 месяцев?		
Approximate total number of workers directly employed at the mine	Примерное общее количество сотрудников, работающих непосредственно на шахте		
Are any workers employed by subcontractors?	Работают ли на шахте сотрудники, нанятые субподрядчиками?		
Does the company prohibit any use of forced labour (e.g., not permitting employees to change jobs) including bonded or involuntary prison labour?	Запрещает ли компания использование принудительного труда (например, не разрешает сотрудникам менять работу), включая зависимый или принудительный тюремный труд?		
Do miners live on the premises of the mine (e.g., in a dormitory)?	Проживают ли шахтеры на территории шахты (например, в общежитии)?		
How would you assess these facilities?	Как вы оцениваете эти условия?		
Are working hours, excluding overtime, limited to a maximum of 48 hours per week?	Ограничено ли количество рабочих часов, не считая сверхурочных, максимум 48 часами в неделю?		
Has the company received any reports or complaints of pressure, threats, bad or degrading treatment, etc. from employees or third parties, including sexual violence?	Получала ли компания жалобы или отчеты о давлении, угрозах, плохом или унижительном обращении и т.д. от сотрудников или третьих лиц, включая сексуальное насилие?		
Are the employees represented by a syndicate or equivalent body?	Представлены ли сотрудники профсоюзом или аналогичной организацией?		

Have the employees been on strike during the past 12 months?	Были ли сотрудники на забастовке в течение последних 12 месяцев?		
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HEALTH AND SAFETY	ЗДОРОВЬЕ И БЕЗОПАСНОСТЬ	Ответ	Комментарии
Did you see a visible health and safety policy and emergency plan?	Предоставили ли вам политику по охране труда и технике безопасности и план действий в чрезвычайных ситуациях?		
Does the company regularly report leading and lagging safety statistics (KPI on safety incidents)?	Регулярно ли компания сообщает о ключевых показателях безопасности (KPI по инцидентам безопасности)?		
Has the company implemented an ISO 45001 Occupational Health and Safety Management System, or nationally recognised equivalent?	Внедрила ли компания систему управления охраной труда и техники безопасности ISO 45001 или ее национальный эквивалент?		
Does the company offer regular health monitoring and screening to prevent workplace illnesses?	Предлагает ли компания регулярное медицинское обследование и мониторинг для предотвращения профессиональных заболеваний?		
Does the company provide adequate first aid equipment and training?	Предоставляет ли компания соответствующее оборудование и обучение для оказания первой помощи?		
Is the workplace environment secure?	Безопасна ли рабочая среда?		
Does the company enforce compliance to PPE requirements by all people on site?	Обеспечивает ли компания соблюдение требований к средствам индивидуальной защиты всеми находящимися на объекте?		
Does the mine provide safety training to visitors?	Предоставляет ли шахта обучение по безопасности для посетителей?		
Does the mine use the accident rate as key performance indicator?	Использует ли шахта показатель частоты несчастных случаев в качестве ключевого показателя эффективности?		
What is the mine safety track record for the past 24 months?	Каков был уровень безопасности на шахте за последние 24 месяца?		
Do you have medical facilities on site?	Есть ли на объекте медицинские учреждения?		

EXTRACTION AND PROCESSING METHOD	ДОБЫЧА И ОБРАБОТКА	Ответ	Комментарии
Describe the mining site (open pit, underground, etc.).	Опишите шахту (открытая, подземная и т.д.).		
Describe the extraction techniques (incl. blasting).	Опишите методы добычи (включая взрывные работы).		
What is the annual production in tonnes (ore)?	Каков годовой объем добычи в тоннах (руда)?		
What is the average metals grade per tonne?	Каково среднее содержание металла в тонне?		
Does the mine source ore or doré from mines outside its concession?	Поставляет ли шахта руду из других шахт за пределами своей концессии?		
Describe the processing techniques, including chemical products used.	Опишите методы обработки, включая используемые химические вещества.		
What type of material will be sent to our refinery for processing?	Какой тип материала будет отправлен на наш перерабатывающий завод для обработки?		

Is the infrastructure and/or the equipment set up proportionate to the production figures?	Соответствуют ли инфраструктура и/или оборудование объему производства?		
Is there any routine maintenance programme for mining equipment, and are maintenance records kept?	Существует ли плановое техническое обслуживание оборудования, и ведутся ли записи о его обслуживании?		

USE OF MERCURY	ИСПОЛЬЗОВАНИЕ РТУТИ	Ответ	Комментарии
How is mercury sourced?	Как осуществляется поставка ртути?		
How is the mercury stored, handled, used, and recovered?	Как ртуть хранится, используется, обрабатывается и утилизируется?		
What are the procedures in place to limit the negative impacts on environment due to the use of mercury?	Какие процедуры существуют для ограничения негативного воздействия на окружающую среду при использовании ртути?		
What are the procedures in place to limit the negative impact on health & safety issues due to the use of mercury?	Какие процедуры предусмотрены для ограничения негативного воздействия на здоровье и безопасность при использовании ртути?		
What is the action plan to find alternative solution to mercury?	Каков план действий по поиску альтернативных решений замены ртути?		
What is the time frame to renounce to the use of mercury?	Каков срок отказа от использования ртути?		

ARTISANAL MINING NEXT TO THE MINE SITE	Частная добыча рядом с шахтой	Ответ	Комментарии
Did you identify any artisanal miners? • On the mine site? • Next to the mine site?	Вы выявили каких-либо частных шахтеров? • На месте шахты? • Рядом с шахтой?		
If yes, please provide brief details.	Если да, пожалуйста, предоставьте краткую информацию.		
Have you seen children working on site?	Вы видели детей, работающих на месте?		
If yes, please provide details.	Если да, пожалуйста, предоставьте подробности.		
Can these ASM miners be considered legitimate ASM?	Можно ли считать этих частных шахтеров законными частными шахтерами?		
How does the mine handle artisanal miners on or next to the mine site?	Как шахта взаимодействует с частными шахтерами на территории или рядом с ней?		
Have there been any instances of conflict or tension? If yes, please describe.	Были ли случаи конфликтов или напряженности? Если да, пожалуйста, опишите.		
Does the mine source from artisanal miners on or next to its concession?	Шахта закупает материалы у частных шахтеров на своей концессии или рядом с ней?		
Are the ASM part of the community?	Являются ли частные шахтеры частью местного сообщества?		
Other comments:	Другие комментарии:		

COMMUNITY	СООБЩЕСТВО	Ответ	Комментарии
Have you resettled communities?	Переселяли ли вы местные сообщества?		
If possible, visit the resettled community	Если возможно, посетите переселённое сообщество		

Does the company engage with indigenous communities to obtain meaningful consent prior to commencing activities that adversely affect the community (e.g., cultural heritage)?	Взаимодействует ли компания с коренными сообществами для получения значимого согласия перед началом деятельности, которая может неблагоприятно повлиять на сообщество (например, культурное наследие)?		
Does the company have regular meetings with local representatives?	Проводит ли компания регулярные встречи с местными представителями?		
If yes, is there a fair, accessible, effective, and timely grievance mechanism?	Если да, существует ли справедливый, доступный, эффективный и своевременный механизм подачи жалоб?		
Is the mine positively affecting the surrounding communities, for example?	Оказывает ли шахта положительное влияние на окружающие сообщества, например?		
Number of direct employees at the site	Количество прямых сотрудников на объекте		
Number of indirect jobs supporting the mine site	Количество косвенных рабочих мест, поддерживающих шахту		
Infrastructure (e.g., school, community centre, etc.)	Инфраструктура (например, школа, общественный центр и т.д.)		
Is the community facing issues that would impact our refinery's reputation (e.g., organized crime, prostitution, alcoholism, abuse of fragile community members, children schooling)?	Сталкивается ли сообщество с проблемами, которые могут повлиять на репутацию нашего завода (например, организованная преступность, проституция, алкоголизм, злоупотребление уязвимыми членами сообщества, образование детей)?		
Does the company have a policy to "act as a good neighbour" minimizing dust, noise, road access, vibration, water access, and light pollution from its operations?	Существует ли у компании политика "добраго соседа", направленная на минимизацию пыли, шума, доступа к дорогам, вибрации, доступа к воде и светового загрязнения от своей деятельности?		
Have there been demonstrations or social unrest in relation with the mine? If so, how was it handled by the mine and the authorities?	Были ли протесты или социальные беспорядки, связанные с шахтой? Если да, как они были урегулированы шахтой и властями?		

CONFLICT AREA AND SECURITY	ЗОНА КОНФЛИКТА И БЕЗОПАСНОСТЬ	Ответ	Комментарии
Is the mine located in a conflict area?	Находится ли шахта в зоне конфликта?		
Are there any armed groups stationed on/near the mine site?	Присутствуют ли вооруженные группы на территории шахты или рядом с ней?		
If yes:	Если да:		
Is it state armed groups?	Это государственные вооруженные группы?		
Is it non-state armed groups?	Это негосударственные вооруженные группы?		
Is it public or private security forces?	Это государственные или частные силы безопасности?		
Describe the general site security infrastructure (CCTV, perimeter fence, controlled access, etc.)	Опишите общую инфраструктуру безопасности на объекте (видеонаблюдение, ограждение периметра, контролируемый доступ и т.д.)		

Describe the precious metal storage security infrastructure and processes.	Опишите инфраструктуру и процессы обеспечения безопасности хранения драгоценных металлов.		
Does the company have procedures for storing, handling, using, and disposing of hazardous chemicals?	Существуют ли у компании процедуры по хранению, обращению, использованию и утилизации опасных химических веществ?		
Does the mine comply or plan to comply with the International Cyanide Management Code?	Соответствует ли шахта или планирует соответствовать Международному кодексу по управлению цианидами?		
How do you assess the security infrastructure?	Как вы оцениваете инфраструктуру безопасности?		
Have you identified any indication of illegal taxation or extortion of money across the whole supply chain?	Выявлены ли признаки незаконного налогообложения или вымогательства денег по всей цепочке поставок?		
Are there appropriate procedures to screen security personnel during the hiring process?	Существуют ли соответствующие процедуры проверки сотрудников службы безопасности при найме?		
Is the screening of security personnel in line with the UN Voluntary Principles on Security and Human Rights?	Соответствует ли проверка сотрудников службы безопасности Добровольным принципам ООН по безопасности и правам человека?		
Are there appropriate procedures to train security personnel?	Существуют ли соответствующие процедуры подготовки сотрудников службы безопасности?		
Is site security managed in-house or outsourced to a third party?	Управляется ли безопасность объекта внутри компании или передана на аутсорсинг?		
Have you determined any risks of incident of human right violations (as defined in the declaration of human rights)?	Были ли выявлены риски нарушения прав человека (как это определено в декларации прав человека)?		

TRANSPORTATION	ТРАНСПОРТИРОВКА	Ответ	Комментарии
Summaries transportation methods from mine site to export location (routed through CAHRA).	Кратко опишите методы транспортировки от шахты до места экспорта (через зоны повышенного риска, определенные CAHRA).		
Is the material stored by a third party prior to export?	Хранится ли материал третьими лицами до экспорта?		

CORRECTIVE ACTIONS RAISED DURING VISIT	КОРРЕКТИРУЮЩИЕ ДЕЙСТВИЯ, ПРЕДЛОЖЕННЫЕ ВО ВРЕМЯ ВИЗИТА	Ответ	Комментарии
Corrective Action	Корректирующее действие		
Mine Comment	Комментарий шахты		
Completion Date	Дата завершения		

REFINER MANAGEMENT REVIEW	ОБЗОР УПРАВЛЕНИЯ ПЕРЕРАБАТЫВАЮЩЕГО ПРЕДПРИЯТИЯ	Ответ	Комментарии
General comments	Общие комментарии		
What is the mine biggest risk?	Каков наибольший риск для шахты?		
Risk rating	Оценка риска		
Low	Низкий		
Medium	Средний		
High	Высокий		
Next Visit Due	Дата следующего визита		