

ADJACENT METAL LINK, INC. KYC QUESTIONNAIRE
RECYCLABLE GOLD SUPPLIER

A. COMPANY DETAILS		
Name		
Registered Address		
Business Address		
Phone Number		
Date of Incorporation		
Country of Incorporation		
Business Registration Number		
Tax Identification number		
VAT number		
If listed, indicate name of stock exchange(s) and ticker		
Website		
External Financial Auditors		
How many direct and indirect subsidiaries does the company have? Please provide a Group chart		
Contact Person of the Company		
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		

B. BUSINESS ACTIVITY		
Type of Business	☐ Bank	☐ Jeweller
	☐ Precious Metals	☐ Scrap Dealer/Pawnshop
	☐ Trader/Dealer	☐ Coins Dealer
	☐ Other Financial Intermediary	☐ Mint
	☐ Industrial	☐ Refinery
	☐ Wholesaler	☐ Others (Pls specify below)
Description of core business activity		
Description of other business activities, if any		
Does the company hold a specific license to conduct its business(es)?	☐ Yes – Please provide a copy	
	☐ Date of issue:	
	☐ Expiry date:	
	☐ No	
	☐ N/A	
Main Market		
Main Products		

**C. BENEFICIAL OWNERS (Shareholders with more than 10%)**

Percentage Holding (%)	Name	Address	Country of Incorporation / Nationality(ies)	Date of Incorporation / Date of Birth

D. ULTIMATE BENEFICIAL OWNERS (Shareholders with more than 10% - Individuals Only)

Percentage Holding (%)	Name	Address	Country of Incorporation / Nationality(ies)	Date of Incorporation / Date of Birth

E. MANAGEMENT STRUCTURE**Board of Directors**

Names	Title	Nationality	Date of Birth

Management

Names	Title	Nationality	Date of Birth

F. FINANCIAL INFORMATION (Please provide copy of latest annual report)

	Currency	Last Reporting Period	Previous Year
Total Shareholder's Equity			
Turnover			

G. HUMAN RESOURCES

Number of Employees within the Company	
Number of Employees within the Group	



H. ORIGIN OF PHYSICAL PRECIOUS METALS

From whom do you source your precious metal products?

☐ Bank	☐ Jeweller
☐ Precious Metals	☐ Scrap Dealer/Pawnshop
☐ Trader/Dealer	☐ Coins Dealer
☐ Other Financial Intermediary	☐ Mint
☐ Industrial	☐ Refinery
☐ Wholesaler	☐ Others (Pls specify below)

List all country(ies) of origin of precious metals delivered to you

Do the precious metals supply by you originate from/transit to a conflict affected and human right abuse high risk areas (CAHRA) as defined on the EU CAHRA list?

Is the Company legally required to have a licence to import precious metals?

☐ Yes (please provide a copy)

Issue Date: _____ Expiry Date: _____

☐ No

☐ N/A



I. FACILITIES		YES	NO	N/A
Do you have refining facilities? Location:				
Do you have melting facilities? Location:				
Do you produce your own jewellery?				
What are the types, forms and percentage of precious metals sourced by the company?				
☐ Recycled Precious Metals (_____ %)				
☐ LBMA GD Bullion		☐ Non-LBMA Good Delivery Bullion (Au=>995/AG=>9999)		
☐ Rudimentary Bars		☐ Jewellery		☐ Broken Jewellery
☐ Coins		☐ Collected Waste		☐ Industrial By-product
☐ Others (please specify):				
☐ Primary Material – Mined Precious Metals (_____ %)				
☐ Large-scale Mining (LSM)		☐ Artisanal Small-scale Mining (LSM)		☐ Mining By-product
What type of precious metals is the Company planning to send for refining?				
☐ Gold / Silver		☐ Others (please specify):		
What is the form of precious metals planned to be sent for refining?				
☐ Unprocessed, recycled precious metals				
☐ LBMA GD Bullion		☐ Non-LBMA Good Delivery Bullion (Au=>995/AG=>9999)		
☐ Coins		☐ Jewellery		☐ Broken Jewellery
☐ Own Production Waste		☐ Collected Waste		☐ Others (please specify):
☐ Melted, Recycled Precious Metals				
☐ Melted Recycled Precious Metals			☐ Rudimentary Bars	
☐ Industrial By-product			☐ Grand-fathered Product	
☐ Others (please specify):				
If you source non LBMA GD bullion / bars (Au =>995 / AG=>9999):				
• Do you identify the refinery?		☐ Yes	☐ No	
• Do you assess if the refinery has any red flags in its supply chain?		☐ Yes	☐ No	
• If the refinery has red flags in its supply chain, do you request the refinery to be audited for its compliance with the OECD due diligence guidance on responsible supply chains from conflict and high-risk areas? If yes, please provide a copy of the audit report.		☐ Yes	☐ No	

J. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY	
Did your company establish a responsible supply chain policy on gold sourced from conflict-affected and high-risk areas that is consistent with the Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?	☐ Yes (please provide a copy) ☐ No
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?	☐ Currently complies ☐ Plans to comply ☐ No
Is in the company complying with any of the following industry initiatives/Regulations?	
☐ LBMA Responsible Gold Guidance	☐ LBMA Responsible Silver Guidance
☐ RJC Code of Practice	☐ EU Conflict Minerals Regulation or equivalent
☐ RJC Chain of Custody Standard	☐ WGC Conflict Free Gold Standard
☐ Responsible Minerals Initiative	☐ Others, please specify: _____
Other comments:	

**K. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY**

Did your company establish a responsible supply chain policy on gold sourced from conflict-affected and high-risk areas that is consistent with the Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?	☐ Yes (please provide a copy) ☐ No
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?	☐ Currently complies ☐ Plans to comply ☐ No
Is in the company complying with any of the following industry initiatives/Regulations?	
☐ LBMA Responsible Gold Guidance	☐ LBMA Responsible Silver Guidance
☐ RJC Code of Practice	☐ EU Conflict Minerals Regulation or equivalent
☐ RJC Chain of Custody Standard	☐ WGC Conflict Free Gold Standard
☐ Responsible Minerals Initiative	☐ Others, please specify: _____
Other comments:	

L. ANTI MONEY LAUNDERING (AML) / COMBATING FINANCIAL TERRORISM (CFT)

Is your institution subject to Anti-Money Laundering / Combating Financial Terrorism Law / Regulation	☐ Yes ☐ No
Name of the AML-CFT Law / Regulation	
Name of the Regulator	
Has your institution established a conformity program that contains AML/CFT policies and procedures, according to internal & international laws, rules and standards?	☐ Yes (please provide a copy) ☐ No

ANTI-BRIBERY POLICY

Does your company have any anti-bribery policy in place?	☐ Yes (please provide a copy) ☐ No
Has the company or the senior management ever been charged for violation of anti-bribery laws or regulations?	☐ Yes (please provide details) ☐ No