



COMPLIANCE FORM FOR ONBOARDING FOREIGN CUSTOMER



Corporate Controller  
STEENCORE GROUP – ROTTERDAM, THE NETHERLANDS



**STEENCORE**  
MINING & ENERGY

**PRIVATE & CONFIDENTIAL**

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DENVER | HONG KONG | LIMA | LUBUMBASHI | ROTTERDAM

## Foreign Business Customer Know Your Customer Form (KYC)

Thank you for being so interested in establishing a business relationship with Steencore Group.

We are enthusiastic to welcome you to experience our global precious metals solutions for your financial needs. Before we onboard your business, we would like to gather certain information about you and your business to better understand our customers and to mitigate financial crime risks, as regulatory compliance requires.

The information we will be asking includes details about your business structure, its customers, shareholders and controlling parties, and countries with which the business works. We have prepared this Know Your Customer (KYC) form to facilitate a smooth onboarding process for our customers. Please go through each section in the form and fill out the necessary information as requested.

We will take reasonable and appropriate measures to verify the key information provided by you to reliable independent sources.

Please feel free to contact us if you have any questions.

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### Contact details:

Steencore Group | Compliance Department

E: [compliance@steencore.com](mailto:compliance@steencore.com)



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GUIDELINES FOR ACCOUNT OPENING FOR MINED MATERIAL

Applicants who want to open an account with Steencore Group must submit the following documents:

1. All documents must be certified colored copies
2. All documents must be submitted in English language
3. All documents must be updated
4. Documents must be translated by a certified translated
5. If material changes take place the Applicant should inform Steencore Compliance department.

I. DOCUMENTS REQUIRED

1. Company Registration Documents	Articles of Association (notarized / apostilled) Certified of Good Standing (notarized / apostilled) Certified of Incorporation (notarized / apostilled) List of Authorized Signatures and Beneficial Owners (notarized / apostilled) Tax registry (notarized / apostilled) Commerce Registry / Business Register Extract (notarized / apostilled)
2. Valid License, Certifications, Reports Policy & Procedures	Export and Import Licenses Latest Financial & Independent Audit Reports Counterparty's Policies & Procedures (AML, CFT Policy)
3. Owner or Shareholder's identification	Id Copies of beneficial owner or shareholder of the company ** Clear and Colored Passport and Visa Page Copies (notarized / apostilled)  Id Copies of directors of the company ** Clear and Colored Passport and Visa Page Copies (notarized / apostilled)
4. Bank account details	Bank Account numbers Bank reference letters
5. Duly Completed Forms	Steencore Group Forms below
6. <b>Undertaking:</b> Please read the entire documents and make sure you fully understand them before starting to apply opening an account with Steencore Group.	<b>Forms Provided (<a href="https://www.steencore.group/corporate-policy-1">https://www.steencore.group/corporate-policy-1</a>):</b> 1. Anti-Money Laundering (AML) <input type="checkbox"/> 2. Combating the Financing of Terrorism (CFT) <input type="checkbox"/> 3. Anti-Bribery and Corruption (ABC) <input type="checkbox"/> 4. Supply Chain Management Policy <input type="checkbox"/>
<input type="checkbox"/> Applicant upholds and conforms to these standards.	

II. GENERAL INFORMATION

Registered name
Registered address
Business address
Office number
Website
Company registration number
TIN/VAT/Tax ID number

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Country and date of incorporation	
Type of company	<input type="checkbox"/> Sole- proprietorship <input type="checkbox"/> Private company <input type="checkbox"/> Stock listed company <input type="checkbox"/> State owned company <input type="checkbox"/> Trust <input type="checkbox"/> Other (please specify) .....
Parent company registered name (Date & country of incorporation)	
Are you a subsidiary of a stock listed company?	<input type="checkbox"/> No <input type="checkbox"/> Yes (please specify the name) .....
Are you a subsidiary of a state-owned company?	<input type="checkbox"/> No <input type="checkbox"/> Yes (please specify the name) .....

III. BUSINESS ACTIVITY

Type of business	<input type="checkbox"/> Trader/Merchant <input type="checkbox"/> Steel Mill <input type="checkbox"/> Bank/Financial Institution <input type="checkbox"/> Mine <input type="checkbox"/> Manufacturer/Industrial <input type="checkbox"/> Smelter <input type="checkbox"/> Refinery <input type="checkbox"/> Other, please specify.....
Please describe the company's core business activity	
Which type of metal does the company purchase and/or sell (produce)?	<input type="checkbox"/> Non-ferrous metals: <input type="checkbox"/> Cu <input type="checkbox"/> Al <input type="checkbox"/> Zn <input type="checkbox"/> Pb <input type="checkbox"/> Sn <input type="checkbox"/> Ni <input type="checkbox"/> tin <input type="checkbox"/> Other <input type="checkbox"/> Precious metals: <input type="checkbox"/> Au <input type="checkbox"/> Ag <input type="checkbox"/> Pt <input type="checkbox"/> Pd <input type="checkbox"/> Rh <input type="checkbox"/> Other <input type="checkbox"/> Ferrous metals: <input type="checkbox"/> Steel <input type="checkbox"/> Iron ore <input type="checkbox"/> Other <input type="checkbox"/> Minor metals: <input type="checkbox"/> Co <input type="checkbox"/> Mo <input type="checkbox"/> Other <input type="checkbox"/> Other, please specify .....
Number of employees	<input type="checkbox"/> Within the company ..... <input type="checkbox"/> Within the group .....

IV. OWNERSHIP INFORMATION

**1. Ultimate Beneficial Owner(s) (More than 25%)**

Percentage holding (%)	Full name Registered name	Permanent residence Registered address	Nationality / country of incorporation	DOB / date of incorporation

**2. Shareholder(s) (More than 25% - Individual Only)**

Percentage Holding (%)	Full name (Surname – First Name)	Permanent residence address	Nationality(ies)	Date of birth

V. BOARD OF DIRECTORS

Title	Full name (Surname – First Name)	Nationality(ies)	Date of Birth

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VI. TOP MANAGEMENT

Title	Full name (Surname – First Name)	Nationality(ies)	Date of Birth
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VII. FINANCIAL INFORMATION

	Currency	Last Reporting Period 20 .....	Previous Year 20 .....
Current Assets			
Current Liabilities			
Total Assets			
Total Equity			
Revenues			
Gross Margin			
Net Income			

VIII. REGULATORY ENVIROMENT

- Do you require to comply with detailed health and safety regulations in the country / province of operations?  Yes  No  NA
- Do you need to comply with detailed environmental regulations in the country / province of operations?  Yes  No  NA
- Is child labor regulated in mining activity in the country / province of operations?  Yes  No  NA
- Are public security forces uses on or around the mine sites?  Yes  No  NA

IX. ANTI MONEY LAUNDERING (AML) & COMBATING FINANCIAL TERRORISM (CFT)

- Is your company subject to Anti-Money Laundering / Combating financial terrorism Law / Regulation  Yes  No
- Name of the AML-CFT Law Regulations
- Name of Regulator
- Did your company a establish a conformity Program that contains AML / CFT policies and Procedures, according to international laws, rules, and standards?  Yes - Kindly provide a copy  No

X. BRIBERY POLICY

- Does your Company have a bribery policy in place  Yes  No
- Has the company or the Senior management ever been charged anywhere in the world for violation of applicable anti-bribery laws or regulations?
- Name of Regulator
- Did your company a establish a conformity Program that contains AML / CFT policies and Procedures, according to international laws, rules and standards?  Yes - Kindly provide a copy  No

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ANTI-MONEY LAUNDERING QUESTIONNAIRE

This questionnaire acts as an aid to firms conducting due diligence and should not be relied on exclusively or excessively. Firms may use this questionnaire alongside their own policies and procedures in order to provide a basis for conducting client due diligence in a consistent with the risk profile presented by the client. The responsibility for ensuring adequate due diligence, which may include independent verification or follow up of the answers and documents provided, remains the responsibility of the firm using this questionnaire.

If you answer “no” to any question, additional information can be supplied at the end of the questionnaire.

I. GENERAL AML POLICIES, PRACTICES AND PROCEDURES

- 1. Is the AML compliance program approved by the company’s board or senior committee?  Yes  No
- 2. Does the company have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?  Yes  No
- 3. Has the company developed written policies documenting the processes that they have in place to prevent, detect, and report suspicious transactions?  Yes  No
- 4. Does the company have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?  Yes  No
- 5. Does the company have a policy prohibiting accounts / relationships with shell companies / company? (A shell company is defined as a company incorporated in a jurisdiction in which it has no physical presence, and which is unaffiliated with a regulated financial group).  Yes  No
- 6. Does the company have policies to reasonable ensure that they will not conduct transactions with or on behalf of shell companies through any of its accounts or products?  Yes  No
- 7. Does the company have policies covering relationships with Political Exposed Persons (PEP’s), their family and close associates?  Yes  No
- 8. Does the company have record retention procedures that comply with applicable law?  Yes  No
- 9. Are the company’s AML policies and practices being applied to all branches and subsidiaries of the company both in the home country and in locations outside of that jurisdiction?  Yes  No

II. RISK ASSESSMENTS

- 10. Does the company have a risk-based assessment of its customer base and their transactions?  Yes  No
- 11. Does the company determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the company has reason to believe pose a heightened risk of illicit activities at or through the company?  Yes  No

III. KNOW YOUR CUSTOMER, DUE DILIGENCE AND ENHANCED DUE DILIGENCE

- 12. Has the company implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transaction?  Yes  No
- 13. Does the company assess its company customers’ AML policies or practices?  Yes  No
- 14. Does the company have a process to review and, where appropriate, update customer information relating to high-risk client information?  Yes  No

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- 15. Does the company complete a risk-based assessment to understand the normal and expected transaction of its customers?  Yes  No
- 16. Does the company screen customers and transactions against lists of persons, entities or countries issued by government / competent authorities?  Yes  No

IV. AML TRAINING

- 17. Does the company provide AML training to relevant employees?  Yes  No
- 18. Does the company retain records of its training sessions including attendance records and relevant training materials used?  Yes  No
- 19. Does the company communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?  Yes  No

Space for additional information:  
(Please indicate which question the information is referenced to).

[Large empty light blue box for additional information]

Name: [ ]

Title: [ ]

Signature: [ ]

Date: [ ]

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CUSTOMER COMPLIANCE AGREEMENT FORM FOR PRECIOUS METALS

(Supplier Due Diligence Agreement)

Company Name: \_\_\_\_\_  
\_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Represented by: \_\_\_\_\_

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

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

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

You will be required to validate and provide all the information mentioned in our questionnaire forms, whether the said party is the main source of Metal or the subcontractor. You will remain responsible and accountable for certification and external audit of supplied precious metals to Steencore Group.

*[declaration page on the following page]*

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PRECIOUS METAL DECLARATION

(Supplier Due Diligence Declaration)

We, (the Company, its directors, and Ultimate Beneficiary Owners) hereby declare that:

- i. We are aware of (i) the latest OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.
- ii. We have read and understood Steencore Group Corporate Policies and the documents in the above paragraph and commit to maintain similar standards. We understand that Steencore Group will perform due diligence to achieve compliance with its Policy and also Annex II of the OECD Guidance. We are aware that Steencore Group and associates are available at any time for summarized or in-depth discussion regarding policies.
- iii. We commit to dealing only with legitimate gold which is free from being directly or indirectly linked to criminal or unethical activity such as (but not limited to) money laundering, ware, terrorism, human rights abuse, worst forms of child labor, unlawful environmental impact, fraud, or corruption.

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

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

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

Compliance officer: .....

Date: .....

Sign & stamp: .....

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