



BANGKO SENTRAL NG PILIPINAS

CURRENCY AND SECURITIES PRODUCTION SUB-SECTOR |
MINT AND REFINERY OPERATIONS DEPARTMENT
GOLD BUYING STATION

CUSTOMER INFORMATION PACKET Recycled Gold

Date _____

Name		Designation	
Address			

Dear Mr. Uy,

Subject: BSP Responsible Gold Sourcing Policy

In line with the Bangko Sentral ng Pilipinas Responsible Gold Sourcing Policy (BSP RGSP), you shall be requested to provide information and documents pertinent to your transactions with the BSP Gold Buying Station.

The BSP RGSP aims to ensure that its gold assets are complying with the standards set forth in the London Bullion Market Association (LBMA) Responsible Gold Guidance. It aims to provide assurance that the BSP, through its Gold-buying Program, has purchased its gold only from known sources and areas that have not used gold to finance any form of crime or conflict, terrorism, human rights violations, and money laundering activities.

Essentially, the BSP RGSP requires that BSP must know its customers – *who you are* and *what you do*. Knowing *who you are* means ensuring that BSP has your legal identity and if you represent an organization, BSP should know the legitimate owners, as well. Knowing *what you do*, on the other hand, means having an understanding that you have a legitimate reason to sell and a known source for materials that you intend to sell to BSP.

As with all BSP records, information may only be shared if the BSP will be legally bound to respond to authorized inquiries.

We encourage you to respect, support and, comply with the BSP RGSP. You are welcome to contact us for any questions and concerns regarding the policy.

Thank you.

Very truly yours

SIGNATORY
Designation

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

2. BUSINESS ACTIVITY																									
a. Type of Business	<table> <tr> <td>Bank</td> <td><input type="checkbox"/></td> <td>Jeweller</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Precious Metals Trader/ Dealer</td> <td><input type="checkbox"/></td> <td>Scrap dealer /pawnshop</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Other Financial Intermediary</td> <td><input type="checkbox"/></td> <td>Coins dealer</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Industrial</td> <td><input type="checkbox"/></td> <td>Mint</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Wholesaler</td> <td><input type="checkbox"/></td> <td>Others, please specify:</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Refinery</td> <td><input type="checkbox"/></td> <td>_____</td> <td></td> </tr> </table>	Bank	<input type="checkbox"/>	Jeweller	<input type="checkbox"/>	Precious Metals Trader/ Dealer	<input type="checkbox"/>	Scrap dealer /pawnshop	<input type="checkbox"/>	Other Financial Intermediary	<input type="checkbox"/>	Coins dealer	<input type="checkbox"/>	Industrial	<input type="checkbox"/>	Mint	<input type="checkbox"/>	Wholesaler	<input type="checkbox"/>	Others, please specify:	<input type="checkbox"/>	Refinery	<input type="checkbox"/>	_____	
Bank	<input type="checkbox"/>	Jeweller	<input type="checkbox"/>																						
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Industrial	<input type="checkbox"/>	Mint	<input type="checkbox"/>																						
Wholesaler	<input type="checkbox"/>	Others, please specify:	<input type="checkbox"/>																						
Refinery	<input type="checkbox"/>	_____																							
b. Description of Core Business Activity																									
c. Description of other business activities if any																									

d. Does the company hold a license to conduct its business (es)?	<input type="checkbox"/> Yes – Please provide a copy Date of issue: Expiry date: <input type="checkbox"/> No <input type="checkbox"/> N/A
e. Main Market	
f. Main Products	

3. BENEFICIAL OWNERS

SHAREHOLDER(S) MORE THAN 10%

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

ULTIMATE BENEFICIAL OWNER

SHAREHOLDER(S) MORE THAN 10% - INDIVIDUAL ONLY

Percentage Holding (%)	Name	Address	Country of Incorporation/ Nationality(ies)	Date of Incorporation/ Date of Birth	PEP Status (YES/ NO)

4. MANAGEMENT STRUCTURE

	Names	Titles	Nationality(ies)	Date of Birth
a. Board of Directors				
b. Management				

5. FINANCIAL INFORMATION

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

Please provide copy of latest annual report

6. HUMAN RESOURCES

a. Number of employees within the Company	
b. Number of employees within the Group	

7. ORIGIN OF PHYSICAL PRECIOUS METALS

a. From whom do you source your precious metal products?

Bank	<input type="checkbox"/>	Individuals	<input type="checkbox"/>
Precious Metals Trader/ Dealer	<input type="checkbox"/>	Jeweler	<input type="checkbox"/>
Other Financial Intermediary	<input type="checkbox"/>	Scrap dealer/pawnshop	<input type="checkbox"/>
Industrial	<input type="checkbox"/>	Coins dealer	<input type="checkbox"/>
Wholesaler	<input type="checkbox"/>	Mint	<input type="checkbox"/>
Refiner	<input type="checkbox"/>	Others, please specify:	<input type="checkbox"/>

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

c. 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](#)?

d. Is the Company legally required to have a license to import precious metals?

Yes, please provide a copy
Date of issue :
Expiry date :
 No
 N/A

8. FACILITIES	YES	NO	N/A
a. Does the company have any refining facilities? Location (if different as registered address):			
b. Does the company have any manufacturing facilities? Location (if different as registered address):			
c. Does the company produce its own jewelry?			
d. What are the types, forms and percentage of precious metals sourced by the Company? <input type="checkbox"/> Recycled precious metals (% _____) <input type="checkbox"/> LBMA GD Bullion <input type="checkbox"/> Non LBMA Good Delivery Bullion (Au =>995/ AG =>9999) <input type="checkbox"/> Rudimentary Bars <input type="checkbox"/> Jewelry <input type="checkbox"/> Broken jewelry <input type="checkbox"/> Coins <input type="checkbox"/> Collected waste <input type="checkbox"/> Others, please specify: <input type="checkbox"/> Industrial By-product _____ <input type="checkbox"/> Primary material – mined precious (% _____) <input type="checkbox"/> LSM <input type="checkbox"/> ASM <input type="checkbox"/> Mining By-Product			

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

Gold/ Silver Others, please specify:

<p>f. What is the form of precious metals planned to be sent for refining?</p> <p><input type="checkbox"/> Unprocessed recycled precious metals</p> <p><input type="checkbox"/> LBMA GD Bullion <input type="checkbox"/> Non LBMA Good Delivery Bullion (Au =>995/ AG =>9999)</p> <p><input type="checkbox"/> Coins <input type="checkbox"/> Jewelry <input type="checkbox"/> Broken jewelry</p> <p><input type="checkbox"/> Own production waste <input type="checkbox"/> Collected waste <input type="checkbox"/> Others, please specify:</p> <p>_____</p> <p><input type="checkbox"/> Melted recycled precious metals <input type="checkbox"/> Others, please specify:</p> <p><input type="checkbox"/> Rudimentary Bars (undefined dimension and fineness)</p> <p><input type="checkbox"/> Industrial by-product</p> <p><input type="checkbox"/> Grand-fathered product</p>	
<p>g. If you source non LBMA GD bullion / bars (Au=>995 / AG=>9999) :</p> <ul style="list-style-type: none"> Do you identify the refinery? 	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<ul style="list-style-type: none"> Do you assess if the refinery has any red flags in its supply chain? 	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>h. 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?</p> <p>If yes, please provide a copy of the audit report</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

9. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY	
<p>a. Did your institution establish a responsible supply chain of gold from conflict-affected and high risk areas policy which is consistent with the standards set forth in the model supply chain policy in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Area? http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf</p>	<p><input type="checkbox"/> Yes Please provide a copy</p> <p><input type="checkbox"/> No</p>
<p>b. Does your institution comply or plan to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?</p>	<p><input type="checkbox"/> Currently complies</p> <p><input type="checkbox"/> Plans to comply</p> <p><input type="checkbox"/> No</p>

<p>c. Is the company complying with any of the following industry initiatives/ Regulations?</p> <p><input type="checkbox"/> LBMA Responsible Gold Guidance</p> <p><input type="checkbox"/> LBMA Responsible Silver Guidance</p>	<p>Additional comments:</p>
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<input type="checkbox"/> RJC Code of Practice <input type="checkbox"/> EU Conflict Minerals Regulation or equivalent <input type="checkbox"/> RJC Chain of Custody Standard <input type="checkbox"/> WGC Conflict Free Gold Standard <input type="checkbox"/> Responsible Minerals Initiative <input type="checkbox"/> Others, please specify: _____	
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10. ANTI MONEY LAUNDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)	
a. Is your institution subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Name of the AML-CFT Law/Regulation	
c. Name of the Regulator	
d. Has your institution established a conformity program that contains AML/CFT policies and procedures, according to internal & international laws, rules and standards?	<input type="checkbox"/> Yes – Please provide a copy <input type="checkbox"/> No

11. ANTI-BRIBERY POLICY	
a. Does your company have a bribery policy in place?	<input type="checkbox"/> Yes – Please provide a copy <input type="checkbox"/> No
b. Has the company or the Senior Management ever been charged for violation of applicable anti-bribery laws or regulations?	<input type="checkbox"/> Yes – Please provide details <input type="checkbox"/> No

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

13. PRECIOUS METALS SUPPLIERS DUE DILIGENCE

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

Companies	YES	NO	Individuals	YES	NO
Company name	<input type="checkbox"/>	<input type="checkbox"/>	Name and first name	<input type="checkbox"/>	<input type="checkbox"/>
Address	<input type="checkbox"/>	<input type="checkbox"/>	Address	<input type="checkbox"/>	<input type="checkbox"/>
Date of Incorporation	<input type="checkbox"/>	<input type="checkbox"/>	Date of birth	<input type="checkbox"/>	<input type="checkbox"/>
Country of Incorporation	<input type="checkbox"/>	<input type="checkbox"/>	Nationality	<input type="checkbox"/>	<input type="checkbox"/>
Business register extract or equivalent document	<input type="checkbox"/>	<input type="checkbox"/>	Copy of ID card or passport	<input type="checkbox"/>	<input type="checkbox"/>
Beneficial Owners	<input type="checkbox"/>	<input type="checkbox"/>	Beneficial Owners	<input type="checkbox"/>	<input type="checkbox"/>
Origin of Precious Metals	<input type="checkbox"/>	<input type="checkbox"/>	Origin of Precious Metals	<input type="checkbox"/>	<input type="checkbox"/>
Description of main activity and financial information	<input type="checkbox"/>	<input type="checkbox"/>	Supplier profile (activity, wealth, etc.)	<input type="checkbox"/>	<input type="checkbox"/>
Tax conformity declaration	<input type="checkbox"/>	<input type="checkbox"/>	Tax conformity declaration	<input type="checkbox"/>	<input type="checkbox"/>
Supply chain policy or procedures	<input type="checkbox"/>	<input type="checkbox"/>			

	YES	NO	N/A
i. Does the Company have a risk-based assessment of its precious metals suppliers (e.g., low, medium or high risks) based on? <ul style="list-style-type: none"> • Location of the counterparty/supply chain • Profile of the counterparty • Supply chain risk (product) 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Does the Company screen precious metals suppliers and transactions against lists of persons, entities or countries issued by government/ competent authorities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k. Does the Company perform enhanced due diligence for high risk precious metals suppliers/supply chains?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
l. Does the Company assess its corporate precious metals suppliers' AML-CFT procedures and practices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TRANSACTION MONITORING	YES	NO	N/A
m. Does the Company perform a risk-based assessment to understand the normal and expected transactions of its suppliers (in order to identify the unusual transactions)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
n. Does the Company have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments (e.g., traveler's checks) or third party payments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o. Does the Company have to register all purchases and sales?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

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

Payment type	Percentage (%)
Bank transfers	
Checks	
Cash	

r. Does the Company have a procedure in place to prevent, detect and report suspicious transactions from its suppliers to the relevant Authority?

s. How many suspect reports has the Company filled and handed over to the relevant Authority for the last two years?

	YES	NO	N/A
t. Does the Company have a maximum amount as per internal policy or regulatory framework?			
• amount allowed for cash payment? If yes, how much?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• amount of deal per supplier in USD? If yes, how much?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
u. Where cash transaction reporting is mandatory, does the Company have procedures to identify transactions structured to avoid such obligations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

14. TRANSACTION MONITORING ON PURCHASE FROM INDIVIDUALS ONLY - TO BE FILLED ONLY BY COMPANY PURCHASING PRECIOUS METALS FROM INDIVIDUALS	YES	NO	N/A
a. Does the Company maintain a transactions register?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the Company have a specific procedure to identify unusual transactions? If yes, please describe:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Is the Company able to verify that a person does not come several times in the counter/in different counters to sell each time a small amount but for a global material amount (smurfing)? If yes, how?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

15. TRANSPORTATION
a. How is the recycled gold transported from your company to the refinery? <input type="checkbox"/> By your own company <input type="checkbox"/> By a third party (external company), which company? _____
b. What is the transport method? <input type="checkbox"/> Road <input type="checkbox"/> Boat <input type="checkbox"/> Plane

16. AUTHORIZED SIGNATORIES – Please provide ID copies		
First Name:	Last Name:	Signature Specimen:
Position:	Signatory Right : <input type="checkbox"/> Joint <input type="checkbox"/> Individual	
First Name :	Last Name:	Signature Specimen:
Position:	Signatory Right : <input type="checkbox"/> Joint <input type="checkbox"/> Individual	

Comments/Additional information

(Please indicate which question the information is referring to):

SIGNATURE

<p>I/we hereby declare that the information given above is true and accurate as of the date of writing.</p> <p>I/we undertake to automatically and promptly inform the Bangko Sentral ng Pilipinas of any material changes.</p>

	Authorized signatory	Authorized signatory
Signature:		
Print Name:		
Title:		
Company Name:		
Date and Location:		



BANGKO SENTRAL NG PILIPINAS

CURRENCY AND SECURITIES PRODUCTION SUB-SECTOR |

MINT AND REFINERY OPERATIONS DEPARTMENT

The Bangko Sentral Ng Pilipinas Responsible Gold Sourcing Policy

Policy Statement

The Bangko Sentral ng Pilipinas (BSP) commits to ensure that the source of its gold products and related sourcing activities comply with the requirements and standards set forth by the London Bullion Market Association (LBMA) and applicable laws, rules, and regulations, with the ultimate goal of ensuring sustainable gold supply chain by building close and long-lasting relationships with gold supplying counterparties and relevant stakeholders based on trust and mutual recognition.

This commitment is cognizant of the risks associated with the related gold sourcing activities and the responsibility to uphold human rights and conflict-free gold sourcing practices, and prevention of illicit flow of funds.

Coverage

The BSP established the BSP Gold Guying Program pursuant to Section 17 of Republic Act (RA) 7076¹ which provides that all gold produced by small-scale miners shall be sold to the BSP, Section 69 of RA 7653², as amended, providing that the BSP may buy gold in any form, subject to such regulations at the Monetary Board may issue and shall be made in the national currency at the prevailing international market price. Further, pursuant to Section 65 and 66 of RA 7653, as amended, the BSP is mandated to maintain the international reserves which is composed of gold and assets in foreign currencies, which was strengthened by the passage of RA 11256³ which provides applicable tax incentives for the sale of gold to BSP.

Based on the above stated mandate, the BSP may conduct gold transactions with small-scale miners, gold-panners, accredited traders and/or sellers, and large-scale mining companies, which shall be referred to in this policy as “gold-supplying counterparties,” that comply with the BSP Responsible Gold Sourcing Policy (Refer to BSP Gold Buying Program <https://www.bsp.gov.ph/CitizensCharter/bspcitizenscharter>)

Responsibilities

The BSP shall:

- A. Buy its gold only from known sources and areas that have not used gold to finance the following:
 - 1) Systematic or widespread human rights abuses associated with the extraction, transport, or trade of gold, including:
 - a) Any forms of torture, or inhuman and degrading treatment
 - b) Forced or compulsory labour
 - c) Worst form of child labour
 - d) Widespread sexual violence or other gross human rights violations
 - e) War crimes, crimes against humanity or genocide.
 - 2) Direct or Indirect support to illegitimate non-state armed groups, public or private security forces (“illegitimate non-state armed groups, public or private security forces”) which:
 - a) Illegally control mines, sites, traders or other intermediaries, and transport routes through the supply chains; or
 - b) Illegally tax or extort money or minerals through the supply chains.

- 3) Bribery and fraudulent misrepresentation of the origin of gold.
 - 4) Activities that result to non-payment of taxes, fees and royalties due to governments related to mineral extraction, trade and export.
 - 5) Money laundering or terrorism financing.
 - 6) Contribution to conflict.
- B. Engage with the gold supplying counterparties that foster environmentally responsible and sustainable policies and work practices and have integrated ESG related principles in their key functions or operations, consistent with the BSP' ESG policy, and considering the following ESG factors;
- 1) Compliance with environmental, health, safety, and labour regulation in country of operations and/or company policy.
 - 2) Environmental management, including;
 - a) Air, water, land pollution and incident management plans
 - b) Water stewardship, especially in water scarce and stressed areas
 - c) Unauthorized sourcing from World Heritage Sites and Protected Areas.
 - 3) Storage, handling, and disposal of hazardous chemicals.
 - 4) Management of labour issues, including remuneration, working hours, collective bargaining, discrimination, diversity, disputes and safeguarding of workers.
 - 5) Community engagement and management programs (land acquisition and community resettlement, cultural heritage sites and indigenous people, closure planning and safeguarding of vulnerable populations).
 - 6) Management of business integrity and ethical conduct and supporting the implementation of relevant initiatives such as the Extractive Industry Transparency Initiative (EITI).
- C. Maintain a reporting organizational structure to support the old supply chain diligence.

I declare that I have read, understood, and will support and comply with the Bangko Sentral ng Pilipinas Responsible Gold Sourcing Policy.

Signature: _____

Name: _____

Date: _____