

CUSTOMER DUE DILIGENCE FOR ANTI-MONEY LAUNDERING PURPOSES

pursuant to Legislative Decree 231/2007, as amended

In accordance with the anti-money laundering legislation and the Responsible sourcing policy, that can be downloaded from our website www.caurum.it, Caurum Srl intends to involve its customers and providers to assure them that the precious metal sources are not involved in any conflicts, money laundering, human rights abuse, terrorist financing, and that they act in respect of the environment and sustainability and apply the principles of traceability throughout the production chain.

To such end, we kindly ask you to provide us with the following documents:

1. Chamber of Commerce company registration (“visura camerale”) updated no more than one month ago
2. Valid company registration or entry in the Chamber of Commerce, Industry and Crafts (issued within 6 months)
3. Precious metals processing / trading licence issued by the police headquarters (“Questura”)
4. Copy of a valid ID of the beneficial owners, legal representative, executor (if other)
5. Entry in the Register of professional gold traders with the Bank of Italy, U.I.F. (if “Banco Metalli”)
6. Entry in the Register of Gold buying agents (“*Compro oro*”) with the Italian Agents and Brokers Organization (“OAM”)
7. The completed form below including the documentation requested therein

Considering the obligation of truthfulness of the information provided of which, according to articles 19-20-21-22 of Legislative Decree 231/2007, as amended, the customer is responsible, we ask you moreover:

- to verify that the data contained in the documents issued by us (transport documents, invoices etc.) are correct;
- to notify us of any future change that may concern you (e.g. company name, legal representative’s address etc.);
- to keep the data provided up-to-date (e.g. IDs).

Finally, please be aware that the anti-money laundering provisions (art.42 of Leg. Decree 231/07) provide expressly that should Caurum srl not be able to gather from customers the necessary information to comply with customer due diligence, it may be forced to give up establishing a new business relationship or terminate an already existing relationship.

Caurum srl provides the following e-mail address odv231@caurum.it to enable any employee, supply chain player and the concerned parties, to express any concern about the supply of the precious metals or any other identified risk.

Caurum Srl will act in such a way as to guarantee the notifying parties against any form of retaliation, discrimination or penalization, also ensuring the confidentiality of their identity, without prejudice to any legal obligations and the protection of the rights of persons wrongly accused and/or in bad faith.

The declarations provided are made on one own’s responsibility, pursuant to articles 46, 47, 76 and 77 of the DPR 445/2000.

They must be signed by the natural person concerned and, in case of legal person, by its Legal Representative.



Caurum Srl ensures that the processing of personal information complies with the provisions of the EU Regulation 2016/670 ("GDPR").

Should you need any further information, please read our data protection disclosure published on our website www.caurum.it.

Caurum S.r.l: Fraz. San Zeno – Strada A, 36 - 52100 Arezzo
Tel. 057599494 - Fax 0575959190 | info@caurum.it - www.caurum.it

Cod. Fisc. 02381430517 Partita IVA: IT02381430517

Registro imprese di Arezzo - Siena n. 02381430517 R.E.A. n. AR-206586 - Cap. Soc. € 596.860,00 i.v.

La società è sottoposta all'attività di direzione e coordinamento di Zaira S.r.l. a socio unico ai sensi dell'art. 2497 cod.civ.

DECLARATION

The legal representative hereby declares that:

- he/she is the owner of the goods that will be delivered to Caurum Srl, or otherwise, that the owner is (Company name, nationality, contacts)
- that he/she has purchased those goods from persons who have provided evidence of legitimate possession of the goods;
- the goods delivered are obtained and/or purchased through legal means, from legitimate sources not involved in the financing of conflicts or in the non-respect of international human rights standards or in the exploitation of child labour, and the supply chain complies with applicable environmental protection and sustainability regulations;
- where applicable, the goods have been extracted from licensed mines operating in accordance with the regulations of the country of origin;
- he/she has taken all necessary measures to prevent the purchase and marketing of goods obtained through illegal activities, which finance, promote or cover up criminal activities;
- he/she has collected said goods in compliance with the legislation and regulations in force in the country of origin;
- he/she does not use child labour in the performance of any service or activity related to the Company;
- he/she complies with current environmental legislation / he/she operates in compliance with legal provisions concerning environmental protection and sustainable development;
- he/she neither promises nor gives any undue advantage, whether directly or through intermediaries, to foreign public officials or private sector employees to procure business or further advantage;

Moreover, for those who purchase from private parties, declares that:

- the goods delivered to Caurum Srl come from parties on which a customer due diligence has been conducted (para.1 art. 4 Leg. Decree 92/2017);
- the data relating to the purchase of the material are set out in the cards used for the traceability of gold and / or other precious metals used or purchased by private individuals provided for in Article 5 of Legislative Decree No. 92/2017;
- the purchase of the goods will be paid cash up to a maximum of € 499.99 (para. 2 art. 4 Leg. Decree 92/2017);
- a summary receipt of purchases has been issued to customers and a copy has been retained pursuant to art. 5, paragraphs 2 and 3, of Leg. Decree no. 92/2017;
- the data gathered pursuant to articles 4 and 5 of Leg. Decree 92/2017 will be kept for 10 years;
- used valuables have not been altered or disposed of for 10 days in accordance with the fifth paragraph of art.128 RD n.773/1931;
- he/she is regularly entered in the Gold buying agents ("*Compro oro*") Register kept with OAM for the sale and purchase and/or exchange of used valuables.

The Company is signing this declaration on behalf of its members, board members, employees, operators and representatives, and is committed to conducting its business within the scope of this declaration so that its providers, consultants, customers and other associates abide by these same principles.

The Company undertakes to promptly inform Caurum Srl of any change or amendment made to this declaration and to keep the information up-to-date and truthful.

Date

Stamp and signature

Company One-man business

1. COMPANY / ONE-MAN BUSINESS INFORMATION

Company name:		Year of incorporation:
VAT number:	Tax code:	
Registered office address:		City and Province:
E-mail:	Certified e-mail:	Phone no.:
IBAN:	Certified e-mail for billing purposes:	Mobile phone no. (if any):

2. BENEFICIAL OWNERS' DETAILS (over 25% of capital)

Last name and first name:	DoB:	Nationality:
Tax code:	ID number:	Issued by and Issue date:
Politically exposed person (PEP):	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Last name and first name:	DoB:	Nationality:
Tax code:	ID number:	Issued by and Issue date:
Persona politicamente esposta:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Last name and first name:	DoB:	Nationality:
Tax code:	ID number:	Issued by and Issue date:
Politically exposed person (PEP):	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3. LEGAL REPRESENTATIVE'S DETAILS (only for corporate entities)

Last name and first name (as indicated in the ID):		
DoB:	Nationality:	
ID number:	Issued by and Issue date:	
Tax code:	Phone no.:	e-mail:
Politically exposed person (PEP):	<input type="checkbox"/> Yes	<input type="checkbox"/> No

4. EXECUTOR'S DETAILS (art.1 Legislative Decree 231/2007)

Last name and first name:	DoB:	Nationality:
Tax code:	ID no.:	Issued by and Issue date :
Politically exposed person (PEP):	<input type="checkbox"/> Yes	<input type="checkbox"/> No

5. MATERIAL TO DELIVER TO CAURUM SRL

<input type="checkbox"/> Gold	<input type="checkbox"/> Silver	<input type="checkbox"/> Platinum
<input type="checkbox"/> Palladium	<input type="checkbox"/> Other precious metals:	
<input type="checkbox"/> Rods and scrap of gold industries	<input type="checkbox"/> Dorè (mine rods)	<input type="checkbox"/> Used goldsmiths to melt
<input type="checkbox"/> Industrial waste and spent catalysts	<input type="checkbox"/> Electronic scrap	<input type="checkbox"/> Goldsmith waste
<input type="checkbox"/> Galvanic solutions	<input type="checkbox"/> Warehouse scrapping	<input type="checkbox"/> Other

6. MATERIAL TO COLLECT FROM CAURUM SRL

<input type="checkbox"/> Gold	<input type="checkbox"/> Other precious metals:	
<input type="checkbox"/> Pure metals (ingots, foils, grains, sponge)	<input type="checkbox"/> Precious metal salts	<input type="checkbox"/> Precious metal solutions

7. OBJECT OF THE RELATIONSHIP

<input type="checkbox"/> Processing with return of pure metal or chemical products or transformation into ingots for return of the loan for use		
<input type="checkbox"/> Sale after sampling, melting and analysis	<input type="checkbox"/> Purchase of metals and other products	<input type="checkbox"/> Consignee for third parties

8. BUSINESS SECTOR

<input type="checkbox"/> Jewellery manufacture	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Manufacturing industry (electronic, chemical, galvanic, etc.)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Recovery and refining of precious metals	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Waste management	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Mining or metal brokering	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Retailing	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Gold buying agents	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Wholesale trade	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Metals counter ("Banco metalli")	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Other (please specify)

9. CERTIFICATIONS AND INDUSTRIAL INITIATIVES

DOES THE COMPANY PARTICIPATE IN ONE OR MORE INDUSTRY INITIATIVES FOR RESPONSIBLE SOURCING?

- | | |
|---|--|
| <input type="checkbox"/> LBMA Responsible Gold Guidance | <input type="checkbox"/> LPPM RESPONSIBLE Platinum and palladium |
| <input type="checkbox"/> LBMA Responsible Silver Guidance | <input type="checkbox"/> WGC Conflict Free Gold Standard |
| <input type="checkbox"/> RJC Chain of Custody Standard | <input type="checkbox"/> Conflict Free Smelter (CFS) Program |
| <input type="checkbox"/> RJC Code of Practice | <input type="checkbox"/> Other : _____ |

DOES THE COMPANY HAVE A CERTIFIED ENVIRONMENTAL AND/OR SAFETY MANAGEMENT SYSTEM?

- | | |
|------------------------------------|--|
| <input type="checkbox"/> ISO 14001 | <input type="checkbox"/> ISO 45001 |
| <input type="checkbox"/> EMAS | <input type="checkbox"/> Other : _____ |

Date

Stamp and signature

NOTES FOR THE COMPLETION OF QUESTIONNAIRE

1. COMPANY/ONE-MAN BUSINESS INFORMATION

To include information about one's own company/firm

2. BENEFICIAL OWNERS' DETAILS

To complete with the details of the beneficial owner/s, attaching IDs and specifying whether the person is a PEP(s)

According to the definition under Legislative Decree 231/07 articles 1 and 20 "beneficial owner" is:

the natural person/s, in whose interest the ongoing relationship is ultimately established, the professional service is rendered or the transaction is carried out;

The beneficial owner of customers other than natural persons is the natural person or persons to whom the direct or indirect ownership or control of the entity can ultimately be attributed.

In the case of limited companies: a) direct ownership means ownership of more than 25 per cent of the customer's capital, held by a natural person;

b) an indication of indirect ownership is constituted by the ownership more than 25 per cent of the customer's capital, held through subsidiaries, trust companies or intermediaries.

3. *In the event that examination of the ownership structure does not make it possible to identify unequivocally the natural person or persons to whom direct or indirect ownership of the entity can be attributed, the beneficial owner shall be the natural person or persons to whom control of the entity is, ultimately, attributable by virtue of: a) control of the majority of the votes that can be exercised at ordinary meetings; b) control of sufficient votes to exercise a dominant influence at ordinary meetings; c) the existence of specific contractual constraints that make it possible to exercise a dominant influence.*
4. *Where application of the criteria set out in the preceding paragraphs does not enable one or more beneficial owners to be identified unequivocally, the beneficial owner shall be the natural person or persons with powers of administration or management of the company.*
5. *In the event that the customer is a private legal entity, as per Presidential Decree no. 361 of 10 February 2000, the following are cumulatively identified as beneficial owners: a) the founders, when alive; b) the beneficiaries, when identified or easily identifiable; c) the holders of management and administration functions.*

According to Legislative Decree 231/07 art. 1, "politically exposed persons" are: natural persons who occupy or ceased to occupy less than one year ago important public offices, as well as their family members and close associates, as listed below: 1) natural persons who occupy or have occupied important public offices are those who hold or have held the position of:

1.1 Head of State, Head of Government, Minister, Vice-Minister and Undersecretary, President of the Region, regional councillor, Mayor of a provincial capital or metropolitan city, Mayor of a municipality with a population of at least 15,000 inhabitants, as well as similar offices in foreign Countries;

1.2 Members of Parliament, Member of the European Parliament, Regional Councillor as well as similar offices in foreign Countries;

1.3 Top ranking officials of political parties;

1.4 Judge of the Constitutional Court, magistrate of the Court of Cassation or of the Court of Auditors, State Councillor and other members of the Council of Administrative Justice for Sicily as well as similar offices in foreign Countries;

1.5 member of the governing bodies of central banks and independent authorities;

1.6 ambassador, chargé d'affaires or equivalent positions in foreign Countries, senior officer in the armed forces or similar positions in foreign Countries;

1.7 members of the administrative, management or control bodies of companies controlled, even indirectly, by the Italian State or a foreign State or in which the Regions, provincial capitals and metropolitan cities and municipalities with a total population of at least 15,000 inhabitants hold a majority or total interest;

1.8 general manager of ASL (Health Local Unit) and hospitals, university hospitals and other bodies of the national health service.

1.9 director, deputy director and member of the management body or person performing equivalent functions in international organizations;

2. family members of politically exposed persons are: the parents, the spouse or partner of the politically exposed person, the children and their spouses as well as their partners;

3. close associates of the politically exposed persons are: 3.1 natural persons related to the politically exposed person by virtue of joint beneficial ownership of legal entities or another close business relationship; 3.2 natural persons who only formally hold total control of an entity known to have been set up, in fact, in the interest of and for the benefit of a politically exposed person.

3. LEGAL REPRESENTATIVE'S DETAILS

For companies: complete with the legal representative's details, attaching an ID and specifying whether he/she is a PEP.

4. EXECUTOR'S DETAILS

For companies and if different from the legal representative, complete with the details of the executor, attaching an ID and specifying whether he/she is a PEP.

According to D. Lgs. 231/07 art. 1 "executor" is: the person delegated to operate in the name and on behalf of the customer or to whom powers of representation are conferred that allow him/her to operate in the name and on behalf of the customer.

5. DOCUMENTATION REQUESTED

Please attach all relevant valid documents in legible copy.

6. MATERIAL TO DELIVER TO CAURUM SRL

To be completed in case of collection from or sale of material containing precious metals to Caurum Srl.

7. MATERIAL TO COLLECT FROM CAURUM SRL

To be completed in case of purchase or processing /collection of material containing precious metals from Caurum.

8. OBJECT OF THE RELATIONSHIP

Please specify the type of business relationship.

9. BUSINESS SECTOR

Please specify the business sector of one's own firm/company.

10. CERTIFICATIONS

Please indicate any industrial initiatives in which the company participates or any certifications held.

The declarations must be read and signed by an authorized person: in the case of one-man businesses by the owner, in the case of companies, by the legal representative or other person authorized to sign if indicated in the Chamber of Commerce certificate or by the executor if indicated in a special proxy.

Firms and companies that do not purchase from private individuals must sign only the first declaration.

Firms and companies that buy from private individuals and "Compro oro" must sign both declarations.

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