



Account Opening Questionnaire

F/KYC/08
Rev No.01
Implementation
Date:
May 20, 2019

ACCOUNT OPENING QUESTIONNAIRE

Important Notice:

- The requested information in this form are basic requirements we need as per applicable regulations. We may request for additional information or supporting documentation if necessary, to open the account. Please fill all applicable fields to your business activity/proposed business as missing information may cause delays in processing the account application.
- Please be informed that documents and information including the company, shareholders, beneficial owners, suppliers and person/s who will operate the account are processed and checked against the World-Check Solutions database and other third-party due diligence software and service providers as part of our KYC procedure.
- For further assistance and clarification, please contact the Compliance Department by phone at +971 4 242 4813 or by email at compliance@aletihadgold.com.

1. COMPANY DETAILS	
a. Name	
b. Registered Address	
c. Business Address	
d. Phone Number	
e. Official Email Address	
f. Official Mobile Number	
g. Business Registration Number	
h. Tax Identification/Registration Number	
i. Website	
j. External Financial Auditors	

2. BUSINESS ACTIVITY	
a. Type of Business	
b. Description of core business activity	
c. Main Market (Geographical Scope)	
d. Main Products	



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3. BENEFICIAL OWNERS

SHAREHOLDER(S) (MORE THAN 25%)

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

ULTIMATE BENEFICIAL OWNER (MORE THAN 25% - INDIVIDUAL ONLY)

SHAREHOLDER(S) (MORE THAN 25%)

Percentage Holding (%)	Name	Address	Nationalities	Date of Birth

4. MANAGEMENT STRUCTURE

	Names	Title	Nationalities	Date of Birth
a. Board of Directors				
b. Management				



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5. FINANCIAL INFORMATION

	Currency	Last Reporting Period	Previous Year
a. Share Capital			
b. Total Shareholder's Equity			
c. Total Balance Sheet			
d. Sales			
e. Net Income			

Banking Details (Please provide the banking details of the Company. We do not accept or make payments to third parties)

Bank Name:

Street / No:

Town / City:

Country:

Postcode:

Account Name:

Account Number:

Sort Code:

IBAN:

ABA:

BIC / SWIFT:

Currency of Account:

Years of Relationship with the Bank:

Origin of the Funds of the Company:

6. HUMAN RESOURCES

a. Number of Employees within the Company

b. Number of Employees within the group



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7. ORIGIN OF PHYSICAL PRECIOUS METALS

a. Profile of your precious metal suppliers (Individual / Company)	
b. Countries of origin of precious metals delivered to us?	
c. Countries of destination of precious metals once refined?	
d. Is the Company legally required to have a license to import precious metals? If yes, please provide a copy of the license.	
e. Is the Company legally required to have a license to export precious metals? If yes, please provide a copy of the license.	

8. FACILITIES

	YES	NO	N/A
a. Does the Company have any smelting or refining facilities?			
b. Does the Company have any manufacturing facilities?			
c. Does the Company produce its own jewellery?			
d. What is the form of precious metals planned to be sent for refining/converting?			
Recycled precious metals (__ %)			
LBMA GD Bullion		Dubai Good Delivery Bar	Non-Good Delivery Bar
Rudimentary Bars		Jewellery	Broken Jewellery
Coins		Own production waste	Collected waste
Others, please specify:			
Primary materials – mined precious metals (__ %)			
a. Gold from Large Scale Mine – (more than 100,000 oz/year)			
b. Gold from Medium Scale Mine – (30,000 – 100,000 oz/year)			
c. Gold from Small Scale Mine – (less than 30,000 oz/year)			
d. Others, please specify:			
Please note that a separate questionnaire is needed to be filled for mined precious metals.			



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9. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY

a. Did your company 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 Areas?	
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?	
c. Is the company complying with any of the following industries initiatives? <input type="checkbox"/> LBMA Responsible Gold or Silver Guidance <input type="checkbox"/> DMCC Risk-Based Due Diligence Guidance for GPM <input type="checkbox"/> RJC Chain of Custody Standard <input type="checkbox"/> WGC Conflict Free Gold Standard <input type="checkbox"/> RMI Responsible Gold Standard <input type="checkbox"/> Others, please specify:	Additional Comments:

10. ANTI MONEY LAUNDERING (AML) – COMBATING THE FINANCING OF TERRORISM (CFT) 11.

a. Is your company subject to Anti-Money Laundering/Combating the Financing of Terrorism Law?	
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?	

12. BRIBERY POLICY

a. Does your company have any bribery policy in place?	
b. Has the company or the Senior Management ever been charged anywhere in the world for violation of applicable anti-bribery laws or regulation?	



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13. DATA PRIVACY PROTECTION

a. Does your company have Data Protection Policy?	
b. Does your company have Data Protection Commissioner?	
c. Does your company have a certified data storage system or and information system?	

14. 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)? If yes, please provide us with his/her name, phone number and e-mail address																																																											
b. Is the Company subject to and AML-CFT audit by an independent party or a governmental party? Date of your last AML-CFT compliance audit:																																																											
c. Does the Company have an AML-CFT training for employees?																																																											
d. Does the Company delegate to third parties some of the compliance functions to be carried out? If yes, what functions and to which company do you delegate?																																																											
e. How long does the Company keep its due diligence files (records)?																																																											
f. What is the typical profile of your precious metals suppliers?																																																											
Corporate:		%																																																									
Individual persons:		%																																																									
g. What type of information does the Company request from its precious metals suppliers?																																																											
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Companies</th> <th style="width: 10%;">Yes</th> <th style="width: 10%;">No</th> <th style="width: 40%;">Individuals</th> <th style="width: 10%;">Yes</th> <th style="width: 10%;">No</th> </tr> </thead> <tbody> <tr> <td>Company Name</td> <td></td> <td></td> <td>Name and First Name</td> <td></td> <td></td> </tr> <tr> <td>Address</td> <td></td> <td></td> <td>Address</td> <td></td> <td></td> </tr> <tr> <td>Date of Incorporation</td> <td></td> <td></td> <td>Date of Birth</td> <td></td> <td></td> </tr> <tr> <td>Country of Incorporation</td> <td></td> <td></td> <td>Nationality</td> <td></td> <td></td> </tr> <tr> <td>Business register extract or equivalent document</td> <td></td> <td></td> <td>Copy of ID card or Passport</td> <td></td> <td></td> </tr> <tr> <td>Beneficial Owners</td> <td></td> <td></td> <td>Beneficial Owners</td> <td></td> <td></td> </tr> <tr> <td>Origin of Precious Metals</td> <td></td> <td></td> <td>Origin of Precious Metals</td> <td></td> <td></td> </tr> <tr> <td>Description of Main Activity and Financial Information</td> <td></td> <td></td> <td>Supplier Profile (activity, wealth, etc.</td> <td></td> <td></td> </tr> </tbody> </table>	Companies	Yes	No	Individuals	Yes	No	Company Name			Name and First Name			Address			Address			Date of Incorporation			Date of Birth			Country of Incorporation			Nationality			Business register extract or equivalent document			Copy of ID card or Passport			Beneficial Owners			Beneficial Owners			Origin of Precious Metals			Origin of Precious Metals			Description of Main Activity and Financial Information			Supplier Profile (activity, wealth, etc.							
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h. Does the Company have a risk-based assessment of its precious metals suppliers? (e.g. Low, Medium, High)															
i. Does the Company screen precious metals suppliers and transactions against lists of persons, entities or countries issued by government/competent authorities?															
j. Does the Company perform enhanced due diligence for high risk precious metals suppliers															
k. Does the Company assess its corporate precious metals suppliers' AML-CFT and purchase procedures and practices?															
Transaction Monitoring	YES	NO	N/A												
l. Does the Company perform a risk-based assessment to understand the normal and expected transactions of its suppliers (in order to identify unusual transactions)?															
m. Does the Company have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments (e.g. traveler's cheques) or third party payments?															
n. Does the Company have to register all purchases and sales? If yes, to which body they are registered?															
o. From which of the following suppliers does the Company purchases its precious metals and what is the average amount of purchase by deal?															
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Supplier Type</th> <th style="width: 25%;">Purchase Percentage (%)</th> <th style="width: 50%;">Average amount in USD per deal</th> </tr> </thead> <tbody> <tr> <td>Bank</td> <td></td> <td></td> </tr> <tr> <td>Corporate</td> <td></td> <td></td> </tr> <tr> <td>Individual</td> <td></td> <td></td> </tr> </tbody> </table>				Supplier Type	Purchase Percentage (%)	Average amount in USD per deal	Bank			Corporate			Individual		
Supplier Type	Purchase Percentage (%)	Average amount in USD per deal													
Bank															
Corporate															
Individual															
p. What usual payment method does the Company use to pay its precious metals suppliers?															
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 70%;">Payment Type</th> <th style="width: 30%;">Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Bank Transfers</td> <td></td> </tr> <tr> <td>Checks</td> <td></td> </tr> <tr> <td>Cash</td> <td></td> </tr> </tbody> </table>				Payment Type	Percentage (%)	Bank Transfers		Checks		Cash					
Payment Type	Percentage (%)														
Bank Transfers															
Checks															
Cash															
q. Does the Company have a procedure in place to prevent, detect and report suspicious transactions from its suppliers to the relevant Authority?															
r. How many suspect reports has the Company filled and handed over to the relevant Authority the last two years?															
s. Does the Company have a maximum amount as per internal policy or regulatory framework?															
<ul style="list-style-type: none"> • Amount allowed for cash payment? If yes, how much? • Amount per deal per supplier in USD? If yes, how much? 															
t. Where cash transaction reporting is mandatory, does the company have procedures to identify transactions structured to avoid such obligations?															



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15. 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 perform statistics on precious metals sold by a person in order to identify unusual transactions?			
b. Does the Company have a specific procedure if a deal with an individual is significantly higher than the average deal? If yes, please describe: _____			
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)? _____			

16. INDUSTRIAL SOURCING – TO BE FILLED ONLY BY INDUSTRIAL COMPANIES	YES	NO	N/A						
a. What type of precious metals do you purchase for industrial purposes?									
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 50%; padding: 2px;">LBMA / Dubai Good Delivery Bars</td><td style="width: 50%; padding: 2px;">Non LBMA/DGD Bars</td></tr> <tr><td style="padding: 2px;">Grains</td><td style="padding: 2px;">Semi – finished products</td></tr> <tr><td style="padding: 2px;">Others, please specify</td><td style="padding: 2px;">Industrial products, please describe</td></tr> </table>		LBMA / Dubai Good Delivery Bars	Non LBMA/DGD Bars	Grains	Semi – finished products	Others, please specify	Industrial products, please describe		
LBMA / Dubai Good Delivery Bars	Non LBMA/DGD Bars								
Grains	Semi – finished products								
Others, please specify	Industrial products, please describe								
b. In which country do you purchase your precious metals products?									
c. From who do you source your precious metal products?									
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 50%; padding: 2px;">Refiners</td><td style="width: 50%; padding: 2px;">Precious Metals Dealers</td></tr> <tr><td style="padding: 2px;">Banks</td><td style="padding: 2px;">Industrial</td></tr> <tr><td style="padding: 2px;">Others, please specify:</td><td></td></tr> </table>		Refiners	Precious Metals Dealers	Banks	Industrial	Others, please specify:			
Refiners	Precious Metals Dealers								
Banks	Industrial								
Others, please specify:									
d. Have you identified the refinery which produced the precious metals used in your supply chain?									
e. Have you assessed the refiner's due diligence policies and practices?									



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Declarations

Source of Funds:

I/We understand that I/we am/are required to declare the source of funds that I/we will be using for the purpose as stated in this application as a part of Al Etihad Gold's requirement to open an account. I/We understand the requirements of the Resolution and the Federal Law No. 4 of 2002 as amended by Federal Law No. 9 of 2014 (On Anti Money Laundering and Combating the Financing of Terrorism) and do hereby undertake that the source of funds/metals are acquired from legitimate sources and evidences of such is available if needed or as requested. I/We do hereby undertake that the funds/metals do not originate from any sanctioned country/entity/person/s from the United Nations and other relevant sanction programs.

Responsible Sourcing of Precious Metals:

I/We hereby acknowledge that we received from Al Etihad Gold its Supply Chain Policy and the guidance listed below and we undertake to review it thoroughly and to comply with its provisions.

1. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas – Supplement in Gold
2. DMCC Rules for Risk Based Due Diligence in the Gold and Precious Metal Supply Chain
3. LBMA Responsible Gold Guidance
4. RMI Gold Refiner Standard

I/We confirm that we are observing and complying with domestic and international laws, rules and regulations, including those governing the illicit trade in precious metals and the United Nation Security Council (UNSC) Sanctions. Also, we hereby undertake that our sources of precious metals are free from conflict financing, criminal funding, worst forms of child labour and human rights abuses.

I/We understand that by working with Al Etihad Gold, we may be requested to provide supply chain information and documentation for due diligence purposes and failure to cooperate may cause Al Etihad Gold to refuse a shipment or supplier as required by the above-mentioned guidance.

SIGNATURE

I/We hereby declare that the information given above is true and accurate as of date of writing.

I/We undertake to automatically inform Al Etihad Gold of any material changes.

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