



بولىون سترىت لتجارة الذهب ش.ذ.م.م BULLION STREET GOLD TRADING L.L.C



+971 4 236 3548



Office no 105, Gold Land Bldg. Al Dhagaya
Street, Deira Dubai



info@bsgtr.com



compliance@bsgtr.com

KNOW ONBOARDING FORM

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 & Expiry Date	
h. Tax Identification/Registration Number	
i. Website	

2. BUSINESS ACTIVITY	
a. Type of Business	<input type="checkbox"/> Precious Metal Trading <input type="checkbox"/> Refining <input type="checkbox"/> Jeweler <input type="checkbox"/> Other: _____ <input type="checkbox"/> Banking of Financial activity
b. Description of core business activity	
c. Main Market (Geographical Scope)	
d. Main Products	<input type="checkbox"/> Gold <input type="checkbox"/> Silver <input type="checkbox"/> Other (please specify):
e. Describe the type of counterparties and suppliers you typically work with	<input type="checkbox"/> Jewelers <input type="checkbox"/> Miners <input type="checkbox"/> Traders <input type="checkbox"/> Banks <input type="checkbox"/> Funds <input type="checkbox"/> Individuals <input type="checkbox"/> Refiners <input type="checkbox"/> Others (please specify):
d. Legal Structure:	<input type="checkbox"/> Limited Liability Company <input type="checkbox"/> Sole Establishment <input type="checkbox"/> Free Zone <input type="checkbox"/> Foreign Company <input type="checkbox"/> Public/listed Company <input type="checkbox"/> Other (please specify):
f. How do you intend to transport the metal from its country of origin to Dubai?	<input type="checkbox"/> Transporter / Secured logistic company <input type="checkbox"/> Hand carry <input type="checkbox"/> Other (please specify):
g. How do you intend to transport the metal in Dubai (locally) to BSGTR?	<input type="checkbox"/> Transporter / Secured logistic company <input type="checkbox"/> Hand carry <input type="checkbox"/> Other (please specify):

3. BENEFICIAL OWNERS --SHAREHOLDER(S)

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

3.1 ULTIMATE BENEFICIAL OWNER

Percentage Holding (%)	Name	Address	Nationalities	Date of Birth

4. MANAGEMENT STRUCTURE

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

5. FINANCIAL INFORMATION	
a. Share Capital	
b. Total Shareholder's Equity	
c. What is your average monthly Purchase volume	
d. What is your average monthly Sale Volume	
e. Please describe the origin of the share capital of your Company.	

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	

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.	
<p>f. What are the types, forms and percentage of precious metals sourced by the Company?</p> <p><input type="checkbox"/> Recycled precious metals (%_____)</p> <p> <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"/> Jewellery <input type="checkbox"/> Broken jewellery <input type="checkbox"/> Coins <input type="checkbox"/> Collected waste <input type="checkbox"/> Others, please specify _____ </p> <p><input type="checkbox"/> Primary material – mined precious metals (%_____)</p>	
<p>g. What type of precious metals is the Company planning to trade?</p> <p> <input type="checkbox"/> Gold <input type="checkbox"/> Others, please specify: _____ </p> <p> <input type="checkbox"/> Silver _____ </p> <p> <input type="checkbox"/> Platinum </p>	

8. FACILITIES	YES	NO	N/A
g. Does the Company have any smelting or refining facilities?			
h. Does the Company have any manufacturing facilities?			
i. Does the Company produce its own Jewellery?			

The following sections are for parties from whom we will purchase Metal – i.e. Suppliers. Other customers may proceed directly to sign the DECLARATION on page 12

9. RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY	
<p>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? http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf</p>	<p><input type="checkbox"/> Yes – If Please provide a copy</p> <p><input type="checkbox"/> No</p>
<p>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?</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 industries initiatives?</p> <p><input type="checkbox"/> LBMA Responsible Gold or Silver Guidance</p> <p><input type="checkbox"/> DMCC Risk-Based Due Diligence Guidance for GPM()</p> <p><input type="checkbox"/> RJC Chain of Custody Standard</p> <p><input type="checkbox"/> WGC Conflict Free Gold Standard</p> <p><input type="checkbox"/> RMI Responsible Gold Standard</p> <p><input type="checkbox"/> Others, please specify:</p>	<p>Additional Comments:</p>

10. ANTI MONEY LAUNDERING (AML) – COMBATING THE FINANCING OF TERRORISM (CFT)	
<p>a. Is your company subject to Anti-Money Laundering/Combating the Financing of Terrorism Law?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>b. Name of the AML-CFT Law/ Regulation?</p>	
<p>c. Name of the Regulator</p>	
<p>d. Has your institution established a conformity program that contains AML/CFT policies and procedures, according to internal & international laws, rules and standards?</p>	<p><input type="checkbox"/> Yes – Please provide a copy</p> <p><input type="checkbox"/> No</p>

11. BRIBERY POLICY	
a. Does your company have any 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 anywhere in the world for violation of applicable anti-bribery laws or regulation?	<input type="checkbox"/> Yes – Please provide a copy <input type="checkbox"/> No

DATA PRIVACY PROTECTION	
a. Does your company have Data Protection Policy?	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Does your company have Data Protection Commissioner?	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. Does your company have a certified data storage system or and information system?	<input type="checkbox"/> Yes <input type="checkbox"/> No

13. 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)? <u>If yes, please provide us with his/her details as below:</u> Name: Contact Number: Email: 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? <table border="1" style="width: 100%;"> <tr> <td>Corporate:</td> <td style="text-align: right;">%</td> </tr> <tr> <td>Individual persons:</td> <td style="text-align: right;">%</td> </tr> </table>	Corporate:	%	Individual persons:	%			
Corporate:	%						
Individual persons:	%						

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

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.		

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
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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?

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?

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?			

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 of a global material amount (smurfing)?			

Please summarize the details of expected transaction/business to be done including the volume, frequency, and payment terms with Bullion Street Gold trading LLC:

1. What is the transaction we should expect to see in your account (i.e. refining, converting, assaying, purchasing of minted bars, buying/selling etc.)?

2. What is the expected volume per transaction/deal we should see in your account?

3. What is the frequency of the transactions we should expect in your account (i.e. daily, weekly, monthly)?

4. What is the mode of payment for settlement of charges, purchases, etc.

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

Comments / Additional information (please indicate which question the information is referring to):

Authority Letter

Date:

To: Bullion Street Gold Trading LLC
Dubai, United Arab Emirates

Subject: Authorized Representative Letter

I, the undersigned, M r/s. _____, _____ nationality passport holder no. _____, (Shareholder/Owner or Manager) of (Company Name), authorize the following personnel singly or jointly to operate our account with Bullion Street Gold Trading LLC. They have the full authority to:

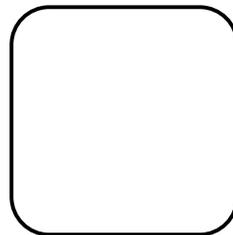
- Delivery of Gold
- Fix Gold
- Signing all statement in connection with the delivery, transfer, receiving of gold and statement of accounts
- Signing/issuing receipt, vouchers, in connection with the delivery of gold and payment related thereto.
- Collecting cheque's and cash in connection with the delivery of gold.

Sl	Name	Passport No	Signature	Contact Number
1				
2				
3				

Thank you & Regards,

(Name & Title)

Company Stamp:



Board Resolution

Date:

The Compliance Department
Bullion Street Gold Trading LLC
Office no 105, Gold Land Bldg.
Al Dhagaya Street, Deira
Dubai UAE

RE : ACCOUNT OPENING

Dear Sir,

Our company_____ agreed to enter into an agreement of opening a **“Gold Trading Account”** with **BULLION STREET GOLD TRADING LLC**, whilst office located in Dubai, subject to the company’s approval as per their policies and procedure.

This also certifies that **Mr.** _____, DESIGNATION of _____ will be the authorized signatory for operating the account

Also below are the specimen signature of the shareholders and the authorized signatory of the company:

Shareholder # 1	Signature
Shareholder # 2	Signature
Authorized person	Signature

Sign and on behalf of

(Company Name)
(Name & Title)

Declarations / Compliance Letter

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 Bullion Street Gold Trading LLC's requirement to open an account. I/We understand the requirements of the **Federal Decree-Law No. (20) of 2018 On Anti-Money Laundering and Combatting the Financing of Terrorism and Financing of Illegal Organizations and the Cabinet Decision No. (10) of 2019 Concerning the Implementing Regulation of Decree Law no. (20) of 2018 on Anti-Money Laundering and Combatting the Financing of Terrorism and Illegal Organizations** 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 Bullion Street Gold Trading LLC 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 Bullion Street Gold Trading LLC, we may be requested to provide supply chain information and documentation for due diligence purposes and failure to cooperate may cause Bullion Street Gold Trading LLC 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 Bullion Street Gold Trading LLC of any material changes.

	Authorized Signatory	Authorized Signatory
Signature: (Please stamp here)		
Print Name:		
Title:		
Date and Location:		

KYC REQUIREMENTS CHECKLIST

Important Notice:

Customers who wish to open an account with Bullion Street Gold Trading LLC must submit the following documents. Failure to send the minimum document required will cause delay or ultimately rejection of the application.

Yes	No	Documents Required
		1. Account Opening Questionnaire <ul style="list-style-type: none"> Please fill all applicable fields to your business activity/proposed business as missing information may cause delays in processing the account application.
		2. Trade or Business License <ul style="list-style-type: none"> Minimum of 3 months before expiration.
		3. Company Registration Documents <ul style="list-style-type: none"> <input type="checkbox"/> Certificate of Registration <input type="checkbox"/> Memorandum of Association <input type="checkbox"/> Articles of Incorporation
		4. Passport or ID copies (and Visa Page if residing in UAE) of the following: <ul style="list-style-type: none"> <input type="checkbox"/> Beneficial Owners / Shareholders <input type="checkbox"/> Directors or Authorized Signatories <input type="checkbox"/> Person/s who will operate the Account
		5. Proof of Address (Latest Utility Bill or Tenancy Contract) of the following: <ul style="list-style-type: none"> <input type="checkbox"/> Registered Address <input type="checkbox"/> Office/Principal Address (place where the business activities are performed) <input type="checkbox"/> Each Beneficial Owner / Shareholder
		6. Board Resolution (stating the intention to open an account and its purpose) and Authority Letter (for authorized personnel that will deal, communicate and/or operate the account with Bullion Street Gold Trading LLC)
		7. Latest Bank Statement or Letter of Good Standing or Trade/Company Reference letter
		8. Tax Registration Number / Registration Certificate
		9. AML – CFT Policy and OECD Supply Chain Policy

For Office use Only:

A. Initial Screening Search
B. Risk Assessment
C. Site-Visit Report
D. Enhanced Due Diligence and Risk Mitigation Report
E. Sample Transactions