

LPPM DUE DILIGENCE CHECKLIST: March 2021

Recyclable Material

No	Check when received	KYC Documents
	<input type="checkbox"/>	<p>“LPPM Questionnaire – Recyclable Material” or any equivalent assessment document</p> <p><i>Please note that some of the requirements below are already included in the LPPM Questionnaire</i></p>
	<input type="checkbox"/>	<p>Identify the counterparty - [included in the LPPM Questionnaire, section 1]</p> <ul style="list-style-type: none"> • Name • Address • Country of incorporation
	<input type="checkbox"/>	<p>Evidence of incorporation using reliable independent source documents, data or information, such as:</p> <ul style="list-style-type: none"> • Business register extract • Certificate of Incorporation • Certificate of good standing • Article of associations • Extract from reliable private database/from regulatory body database
	<input type="checkbox"/>	Identify the beneficial owner(s) – [included in the LPPM Questionnaire, section 3]
	<input type="checkbox"/>	<p>Screening (through reliable database such as Worldcheck) on:</p> <ul style="list-style-type: none"> • Counterparty • Beneficial owner(s) • Others (based on risk assessment)
	<input type="checkbox"/>	Financial details – [included in the LPPM Questionnaire, section 5]
	<input type="checkbox"/>	Documentation supporting the purpose of the business relationship - [included in the LPPM Questionnaire, section 8]
	<input type="checkbox"/>	Documentation supporting business details / Customer profile – [included in the LPPM Questionnaire]
	<input type="checkbox"/>	Collecting and assessing Recycled Pt/Pd-supplying counterparty's AML-CFT policy and practices, if applicable – [included in the LPPM Questionnaire, section 10 & 12]
	<input type="checkbox"/>	<p>Corroborative documentation based on the risk assessment such as for example:</p> <ul style="list-style-type: none"> • Authorised signatories' IDs • Beneficial owners' IDs • Internet research • Annual report • Group chart • References • Licenses • Certifications • Counterparty's policies and procedures (AML-CFT policy, responsible supply chain policy, etc.) • Google map & street view of given address • Counterparty's office pictures • Regulatory environment assessment • Etc.
	<input type="checkbox"/>	<p>Risk assessment from the Refiner's perspective</p> <p><i>Note that the LPPM Supply Chain Assessment Form can be used</i></p>
Additional requirements for high risk customers only		
	<input type="checkbox"/>	Report visit on on-site visit
	<input type="checkbox"/>	Screening on all companies located in conflict related areas in the chain from the Platinum/Palladium supplying counterparties to the refinery