

LPPM DUE DILIGENCE CHECKLIST

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 |