

**Limited Liability Partnership
"Tau-Ken Altyn"**

APPROVED BY

Director of LLP "Tau-Ken Altyn" A.S. Tleulin

5th January 2022 year

Policy on Responsible Supply Chains of Gold

Contents:

SCOPE AND PURPOSE.....	3
TERMS AND DEFINITIONS.....	4
1. ORGANIZATION AND PRINCIPLES OF SUPPLY CHAIN MANAGEMENT.....	5
2. IDENTIFICATION AND RISK ASSESSMENT IN THE SUPPLY CHAIN.....	12
3. DEVELOPMENT AND IMPLEMENTATION OF RISK MITIGATION / RISK MANAGEMENT ACTIVITIES.....	14
4. AUDIT.....	19
5. ANNUAL REPORTS.....	20
APPENDIX No. 1/1.....	21
APPENDIX No. 1/2.....	29
APPENDIX No. 2.....	39
APPENDIX No. 3.....	42
APPENDIX No. 4.....	44

SCOPE AND PURPOSE

This Policy describes the existing procedure for managing the supply chains of gold and precious metals at LLP "Tau-Ken Altyn" (hereinafter - the "Partnership"). The Policy on Responsible Supply Chains of Gold (hereinafter - the "Policy") is developed based on the requirements of the London Bullion Market Association (LBMA) to ensure reliable selection and assessment of suppliers, combat systematic or mass violations of human rights, avoid contributing to conflicts, comply with high standards of anti-money laundering and counter-terrorist financing practices.

The Policy includes:

- structure and principles of supply chain management;
- description of supplier identification procedures;
- description of risk assessment procedures;
- description of risk mitigation/risk management procedures;
- organization of independent compliance verification with LBMA requirements;
- description of the personnel training process;
- annual reporting procedure on the Policy's functioning.

The requirements of the Policy apply to the activities of the management and staff of all departments and divisions of the Partnership in performing their official duties.

RESPONSIBILITY

The responsibility for complying with the requirements of this policy lies with the heads of structural divisions of the Partnership involved in interactions with counterparties and participating in the process of supplying raw materials and precious metals.

TERMS AND DEFINITIONS

Counterparty Questionnaire – a list of questions sent to the counterparty to identify basic information about the company before starting cooperation and when deciding to continue cooperation.

Secondary Gold – raw materials and materials containing gold that have previously undergone a refining process (scrap, jewelry waste, etc.).

Primary/Mined Gold – raw materials and materials containing gold that have not previously undergone a refining process (Dore alloy, cathode gold, alluvial gold, etc.).

Counterparty (customer, supplier) – a legal or natural person (individual entrepreneur) who is a party to the contract and supplies raw materials and precious metals.

Partnership – LLP "Tau-Ken Altyn".

Responsible Division – a structural division of LLP "Tau-Ken Altyn" involved in organizing and supporting the supply of raw materials and precious metals.

Marketing – the head of the Partnership's structural division/employee engaged in marketing and sales activities responsible for the functioning of the risk management system in accordance with LBMA requirements and this policy.

LBMA Guidance / RGG – LBMA Responsible Gold Guidance.

Quality Control Department (QCD) – Technical Control Department.

Counterparty Questionnaire – a list of questions sent to the counterparty to identify compliance with LBMA requirements.

Policy – this policy on responsible gold supply chains.

Counterparty Folder – a folder in the information network of "Tau-Ken Altyn" that must be updated by Marketing staff for each counterparty.

Management Representative – the head of the Partnership responsible for making final decisions regarding the functioning of the risk management system in accordance with LBMA Guidance.

Counterparty Certificate/Report – a certificate/report containing information about shareholders, management structure, financial information, etc.

Counterparty Risk Assessment Form – a form for assessing risk in accordance with Appendix No. 4.

1. ORGANIZATION AND PRINCIPLES OF SUPPLY CHAIN MANAGEMENT

The Director of the Partnership has the authority and responsibility for:

- providing overall leadership for the activities of all structural divisions within the enterprise's existing system;
- distributing authority and responsibility to create the necessary conditions for implementing System requirements;
- allocating the necessary resources for the full functioning of the System.

The Director of the Partnership may delegate authority for overall leadership in supply chain management of gold. The management representative is appointed by the Partnership's order.

The Policy requirements apply to the following divisions/employees:

- Technical Director;
- Financial Director;
- Marketing;
- Chief Technologist;
- Senior Manager for Precious Metals Accounting and Storage;
- Senior Manager for Analytics and Risks;
- Security Service;
- Legal Service;
- Technical Control Department;
- Central Plant Laboratory;
- Raw Material Acceptance Commission for Refining Production;
- Procurement Service.

Employees of responsible divisions conduct annual evaluations of each counterparty involved in the supply chain based on the following criteria:

- availability of counterparty documents in accordance with clause 1.1 of the Policy;
- availability of the counterparty questionnaire in accordance with clause 1.3 of the Policy;
- availability of provided originals of requested documents or duly certified copies, as well as their electronic versions;
- availability of a questionnaire with general information about the counterparty (clause 1.3);
- presence/absence of suspicious transactions from the counterparty during the cooperation period;
- presence/absence of additional risks to be considered when concluding the contract, such as the country of origin of the gold.

Based on the assessment results, the employee of the responsible division marks the counterparty risk assessment form (Appendix 3).

Employees of responsible divisions assess the risk level when establishing business relationships with the counterparty. The identification procedure includes several stages.

1.1. To identify a legal entity/individual entrepreneur, Marketing employees request the following information:

For suppliers of primary raw materials:

- Charter in the current version (with all amendments);
- Certificate of state registration (issued by Electronic government of the Republic of Kazakhstan) not older than one week;
- Decision of the company's authorized body on the election of the first manager;
- Order on the appointment of the first manager;
- License/contract for subsoil use with the work program;
- List of participants in the current version;
- Information about beneficiaries: full name/company name, shareholding, address, country of registration/citizenship, registration date/date of birth;
- Information about ultimate beneficial owners: full name, shareholding, address, citizenship, date of birth;
- Completed questionnaires signed and stamped (Appendices 12);
- Certificate of recent changes to the constituent documents (for residents of the Republic of Kazakhstan, issued by Electronic government of the Republic of Kazakhstan) not older than one week;
- Copy of VAT registration certificate;
- Copies of founders' identity documents, and if the founders are legal entities – constituent documents;
- If documents are signed not by the executive body (General Director, Director) – a copy of the power of attorney for the person acting based on powers;
- Audited financial statements or a copy of the annual financial statements for the last reporting year, including:
 - balance sheet;
 - income statement;
 - cash flow statement;
 - statement of changes in equity;
 - breakdown of main balance sheet items: receivables, payables, fixed assets, loans, etc.;
- Certificate from the tax authority on the absence of tax debts not older than one week;

- Registration on the portal www.zakup.sk.kz;
- Counterparty questionnaire (Appendix 12).

For suppliers of secondary raw materials:

- Charter in the current version (with all amendments);
- Certificate of state registration not older than one week;
- Decision of the company's authorized body on the election of the first manager;
- Order on the appointment of the first manager;
- Copy of VAT registration certificate;
- Information about beneficiaries (including ultimate): full name/company name, shareholding, address, country of registration/citizenship, registration date/date of birth, copies of identity documents;
 - Copies of founders' identity documents, and if the founders or shareholders are legal entities – constituent and registration documents;
- Audited financial statements or a copy of the annual financial statements for the last reporting year, including:
 - balance sheet;
 - income statement;
 - cash flow statement;
 - statement of changes in equity;
 - breakdown of main balance sheet items: receivables, payables, fixed assets, loans, etc.;
- Current certificate from the tax authority on the absence of tax debts not older than one week;
- Completed questionnaires signed and stamped (Appendices 12);
- Other documents confirming the origin of raw materials (purchase and sale agreements, pledge tickets, registration certificate at the Financial Monitoring Committee, etc.);
- Registration on the portal www.zakup.sk.kz.

Additional documents/information about the counterparty may be required based on the RGG LBMA requirements.

1.2. When reviewing documents, including the constituent documents of a legal entity and documents confirming its state registration, employees, in order to understand their client, pay attention to:

- the execution of the constituent documents (including all registered changes and additions) of the client and documents confirming state registration as a legal entity;
- the composition of the founders (participants) of the legal entity, determining individuals who can influence the decision-making by the legal entity's bodies;

- the structure of the governing bodies of the legal entity and their powers;
- the size of the registered and paid charter (contributory) capital or the size of the charter fund of the property;
- the relevance of documents (must be valid on the date of their presentation).

When it is established that an individual is acting on behalf of a client, employees identify the representative, verify their authority, and also identify the client being represented.

In cases involving transactions with third parties, employees are required to obtain information and documents from the client that allow for the identification of these third parties.

1.3. Marketing sends the counterparty a questionnaire (Appendix No. 2) supplementing the counterparty questionnaire (Appendix No. 1) and containing information about the client, its activities, operations with the Partnership, and other details. If the counterparty has difficulties filling out certain questions in the questionnaire, Marketing clarifies the information and supplements the questionnaire received from the counterparty based on the responses.

1.4. Marketing, in collaboration with responsible structural divisions and using software products and available information agencies, forms a report on the counterparty containing information about shareholders, management structure, financial information, number of employees, etc. The counterparty report is provided electronically to the designated Compliance Officer via corporate email for review and preparation of a compliance report.

1.5. If the Compliance Officer provides a positive conclusion, the issue of transaction approval is submitted for final approval by the Partnership's governing body.

1.6. During document collection, Marketing informs counterparties about LBMA guidance requirements. In response, the counterparty confirms its compliance with LBMA guidance when concluding a contract with the Partnership by including relevant terms in the contract. The contract with the counterparty includes a clause referring to the Policy at <https://taukenaltyn.kz/good-delivery/>.

1.7. Based on the received documents during contract approval, employees of responsible divisions enter the necessary information about the counterparty in electronic form into the information network of LLP "Tau-Ken Altyn".

1.8. Payment for raw materials containing precious metals is made by bank transfer via interbank transfers. Responsible employees of the Partnership ensure proper documentation and support for payments by timely submitting the necessary documents for payment execution by the respective party.

1.9. Cooperation with State Authorities. The Partnership fully and transparently cooperates with state authorities and ensures full access to the Partnership's reports and information about transactions with suppliers upon request from state authorities and in other applicable cases.

1.10. Marketing forms a counterparty folder from the documents specified in clauses 1.1 - 1.6, either in paper or electronic form, with storage in the Partnership's information network, excluding questionnaires according to Appendix 12, which are submitted in person.

1.11. Counterparty documents involved in transactions with the Partnership and participating in the supply chain of raw materials and precious metals are reviewed by employees of responsible divisions upon concluding a contract for the next period or once a year to update the information contained therein. The document retention period is at least 5 years.

Ensuring the functioning of the Policy, compliance with regulatory requirements, and supply chain analysis is assigned to Marketing (responsible for compliance with RGG requirements). The employee must meet the following requirements:

- have sufficient qualifications, knowledge, experience, and training to conduct supply chain analysis (higher education, work experience of at least 3 years);
- possess resources necessary for performing relevant duties (software, intellectual, and material resources);
- have the opportunity to report important information to senior management, personnel, and suppliers.

Responsibilities of Marketing:

- collecting information from employees of responsible divisions about counterparties, transactions, and risk levels;
- filling out the counterparty risk assessment form;
- preparing an annual report on Policy compliance with LBMA guidance and measures taken;
- interacting with external auditors during the audit of the Partnership's compliance report.

Managers of responsible divisions conduct training for newly hired employees on the following issues:

- regulatory acts governing supply chain management principles and anti-money laundering and counter-terrorism financing principles;
- operations exhibiting signs of unusual transactions (Appendix No. 4);
- working with counterparty documents.

Current employees of responsible divisions undergo repeated training based on risk levels and work nature at least once a year.

Marketing and other involved responsible structural divisions must regularly participate in relevant trainings/seminars/courses and other training programs. The training plan is approved

annually by the Partnership's director. The training plan must include events and seminars (including webinars) conducted by LBMA.

All information about raw materials received from the counterparty is stored in the Technical Control Department. All received information about the counterparty is stored electronically in the Partnership's information network and in paper form in the counterparty's file.

Document forms, their processing, handling, and storage procedures are specified in:

- Rules for the procurement of goods, works, and services by JSC "Samruk-Kazyna" National Welfare Fund;
- Instructions of LLP "Tau-Ken Altyn" "On the procedure for accounting and storage of precious metals, sampling, inventory of precious metal actual residues";
- Technological instructions.

All information about the counterparty, including raw material purchase operations and finished product sales, is monitored for compliance with due diligence requirements for gold supply chains. Information about all suspicious operations is forwarded to Marketing, which, in turn, reports to the Partnership's senior management.

Employees of responsible divisions aim to strengthen relationships with clients through the following measures:

- including provisions on practical guidance for compliance with LBMA principles and procedures in contracts with suppliers and customers;
- providing informational support to clients to ensure their activities align with LBMA guidance goals and principles.

If the counterparty violates LBMA principles, the responsible division employee notifies Marketing, which documents information about the counterparty and the suspicious operation and presents the information to the supervising management representative in a memo. After receiving a resolution from the management representative, Marketing, maintaining confidentiality, sends a report to LBMA, certified by the management representative's signature and stamped by the Partnership (email: Regulatory.affairs@lbma.org.uk).

In order to Ensuring a Reliable Supply Chain and Preventing Violations of LBMA Principles, general security measures taken by the Partnership include:

- packaging each batch of goods in sealed secure containers with individual markings to prevent tampering or content removal;
- physical separation of individual batches until their verification and acceptance;
- involving individuals/specialists in batch evaluation who are not involved in any conflict of interest;
- notifying Marketing (and, if necessary, the management representative) of any violations;

- in case of repeated issues with the same supplier, documenting the violation and taking measures to terminate cooperation.

2. IDENTIFICATION AND RISK ASSESSMENT IN THE SUPPLY CHAIN

When assessing risks in the supply chain of raw materials containing precious metals, employees of responsible divisions consider geographical features of the potential supplier's operations and conducted transactions, noting the following unusual circumstances and deviations from the norm:

- Origin and transportation from conflict zones or high-risk areas;
- Level of government regulation and oversight;
- Share of cash transactions in the respective country;
- Degree of conflict and human rights violations;
- Use of payment systems (official banks and informal systems);
- Level of involvement of criminal organizations (resources of the Financial Monitoring Committee of the Ministry of Finance of the Republic of Kazakhstan (website: <http://kfm.gov.kz/ru/the-list-of-organizations-and-individuals-associa> – a constantly updated list of organizations and individuals associated with extremist or terrorist activities);
- Access level from the respective country to nearby markets or processing enterprises located in conflict and/or high-risk areas;
- Enforcement of laws aimed at combating pronounced criminal activity;
- Existence of sanctions and/or embargoes against the respective country and individual physical and legal entities in that country.

Employees of responsible divisions conduct due diligence of potential suppliers whose activities may be associated with risk factors by:

1. For all potential suppliers:
 - Identifying the counterparty at the pre-contract stage in accordance with clauses 1.1-1.10 of this Policy;
 - Annually reviewing transaction documentation using random sampling;
2. For suppliers of mined (primary) gold:
 - Established weight and assay results (from the counterparty);
 - Shipping/transportation documents (waybill/air waybill, pro forma invoice if applicable);
 - Export and import forms for high-risk transactions, if applicable;
 - License/contract for subsoil use/extraction.
3. For suppliers of secondary gold:
 - Approximate weight (from the counterparty);
 - Shipping/transportation documents (waybill/air waybill, pro forma invoice if applicable);
 - Export and import forms for high-risk transactions, if applicable.

4. For high-risk categories, the following minimum criteria will be considered:

- Mined or secondary gold originates from or was transported through conflict-affected or high human rights risk areas;

- Claimed mined gold originates from a country with limited credible reserves, probable resources, or expected gold production levels;

- Secondary gold comes from a country where gold from conflict-affected and high human rights risk areas is known or suspected to transit;

- The counterparty supplying gold or other known companies located upstream are situated in a country with a high risk of money laundering;

- The counterparty supplying gold or other known companies involved in exploration or mining, or their beneficial owners with significant influence over the gold-supplying counterparty, are politically exposed persons;

- The counterparty supplying gold or other known companies engaged in high-risk business activities such as arms trade, gaming and casinos, antiquities and art, cults and their leaders;

- Gold originated from artisanal mining.

Key indicators of unusual gold and precious metals transactions that may be associated with conflicts or severe violations in mining, transportation, and/or trading are provided in Appendix 4.

In case of suspicions of non-compliance with anti-terrorism and fraud prevention measures, an employee of any division anonymously sends information through written messages to a special mailbox on the premises and to the following email addresses: sm@taukenaltyn.kz, info@taukenaltyn.kz. Marketing monitors messages and verifies the received information.

If suspicions about the counterparty are confirmed, Marketing sends a memo to the Partnership's management and takes all necessary actions in accordance with this Policy.

3. DEVELOPMENT AND IMPLEMENTATION OF RISK MITIGATION / RISK MANAGEMENT ACTIVITIES

As part of client identification and transaction processing, employees of responsible divisions evaluate and assign a risk level to the client in accordance with LBMA requirements: "high," "medium," or "low."

Employees of responsible divisions assess the risk level based on documents received from the client, questionnaires, information from various sources, and identified indicators of unusual gold transactions that may be associated with conflicts or severe violations in mining, transportation, and/or trading.

To mitigate adverse effects, the Partnership has developed activities based on internationally accepted principles, standards, and reliable supply chain management procedures:

3.1. The risk level assessment is recorded by employees of the structural divisions responsible for transactions with clients. This information is stored electronically in the counterparty's folder and in paper form in the archive. If risks are identified, the responsible division employee notifies Marketing, which, in agreement with management, decides on the risk management mechanism for the respective counterparty;

3.2. Physical separation and protection of individual batches of goods in the supply system associated with risk factors;

3.3. If risks are identified or additional supplier verification is required, the Partnership has developed the following actions:

- Continuing cooperation and consulting the supplier on risk reduction possibilities;
- For medium risk level – temporary suspension of interactions with the supplier, whose activities are associated with risk factors, while continuing assessable risk mitigation activities;
- For high risk level – terminating cooperation with suppliers whose activities are associated with risk factors if they do not employ risk mitigation measures and/or if such measures are not feasible or acceptable from a cost-benefit analysis and company capability perspective.

Risk Level	Measures for Risk Mitigation and Management
Low	Start or continue cooperation
Medium	Start or continue cooperation with simultaneous risk mitigation efforts
High	Suspend cooperation with simultaneous risk mitigation efforts by collecting additional information confirming or refuting the possibility of adverse risk consequences OR Terminate cooperation with suppliers characterized by risk factors and/or sources of risk

A. Risk "Harsh Treatment in Gold Mining, Transportation, or Trade"

In supply operations from conflict-affected or high-risk areas, we will not permit or in any way benefit from, support, or contribute to any of the following actions by any party:

- Any form of violent, cruel, inhuman, and degrading treatment;
- Any form of forced labor, understood as work or services performed by a person under threat of penalty or without voluntary consent;
- Extreme forms of child labor;
- Other serious human rights violations and abuses;
- War crimes or other violations of international humanitarian law, crimes against humanity, or genocide.

If any of the listed actions are confirmed, the counterparty is assigned a "High" risk level.

Risk Management

We will immediately suspend or terminate cooperation with suppliers if justified risks are identified that they are purchasing from or are linked to any party committing harsh actions.

B. Risk "Direct or Indirect Support to Non-State Armed Groups"

We will not permit any direct or indirect support to non-state armed groups through gold mining, transportation, trading, storage, and export. "Direct or indirect support" includes, but is not limited to, supplying mineral raw materials, making payments, or providing material support and equipment to non-state armed groups or units that:

- Illegally control mines or otherwise control transportation routes, trading hubs, and gold mining areas; and/or
- Illegally tax or extort money or gold at points of access to mines, along transportation routes, or at trading hubs; and/or
- Illegally tax or extort money from intermediaries, export companies, or international traders.

If any of the listed actions are confirmed, the counterparty is assigned a "High" risk level.

Risk Management

We will immediately suspend/terminate cooperation with suppliers if justified risks are identified that they are purchasing from or are linked to any party directly or indirectly supporting non-state armed groups.

C. Risk "Bribery and Deliberate Misrepresentation of Gold Origin"

We will not offer, promise, give, or demand any bribe and will refuse any request for bribes to conceal or alter the origin of gold, mislead about taxes, fees, and royalties paid to government authorities for gold extraction, trading, storage, transportation, and export.

Risk Management

We will immediately suspend/terminate cooperation with suppliers if justified risks are identified that they are offering or making bribes and misrepresenting the true origin of gold.

D. Risk "Taxes, Fees, and Royalties Paid to Government Authorities"

In our work with counterparties from conflict-affected or high-risk areas, we will monitor the payment of taxes, fees, and royalties related to extraction, trading, and export to government authorities and, according to the company's position in the supply chain, we commit to disclosing these payments following the principles established by the Extractive Industry Transparency Initiative (EITI).

Risk Management

According to the Partnership's position in the supply chain, we commit to cooperating with suppliers, central and local authorities, international organizations, civil society organizations, or interested third parties (if necessary) to track supplier compliance, actions taken to prevent or mitigate risks, and measures implemented within a reasonable timeframe. We will suspend or terminate cooperation with mining suppliers after unsuccessful attempts to mitigate risks.

E. Risk "Direct and Indirect Support to State or Private Security Forces"

We agree to eliminate direct or indirect support to state or private security forces that illegally control mining territories, transportation routes, and mining companies in the supply chain; illegally tax or extort money or minerals at points of access to mines, along transportation routes, or at trading hubs; or illegally tax or extort money from intermediaries, export companies, or international traders.

We recognize that the role of state or private security forces at mines and/or surrounding areas and/or along transportation routes should solely consist of maintaining legality, including protecting human rights, ensuring the safety of miners, equipment, and facilities, and protecting mine or transportation route areas from interference in legitimate mining and trade activities.

If we or any company in our supply chain hires state or private security forces, we commit to or require such security forces to provide services in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or implement measures to ensure that individuals or units of security forces known to be responsible for severe human rights violations are not hired.

We will support efforts or take measures to engage with central or local authorities, international organizations, and civil society organizations to promote acceptable solutions for improving transparency, proportionality, and accountability for payments made to state security forces for security services.

We will support efforts or take measures to engage with central or local authorities, international organizations, and civil society organizations to avoid or minimize the impact on vulnerable groups, particularly artisanal miners, where minerals in the supply chain are mined using artisanal or small-scale mining, and adverse effects associated with the presence of security forces at mines.

Risk Management

According to the company's defined position in the supply chain, we will promptly develop, adopt, and implement a Risk Management Plan with upstream suppliers and other interested parties to prevent or mitigate the risk of direct or indirect support to state or private security forces if we identify such a justified risk. In such cases, we will suspend or terminate interactions with suppliers after unsuccessful attempts to mitigate the risk within six months from the adoption of the risk management plan.

F. Risk "Money Laundering"

We will support efforts or take measures to contribute to effectively eliminating money laundering if we identify a justified risk of money laundering resulting from or related to gold extraction, trading, processing, transportation, or export, obtained from illegal taxation or extortion of minerals at points of access to mines, transportation routes, or trading hubs by suppliers.

Risk Management

We will immediately suspend/terminate cooperation with suppliers if justified risks are identified that they are engaging in money laundering operations.

4. AUDIT

To conduct a systematic and independent analysis to determine the compliance and effectiveness of the Policy, adherence to LBMA standards, an annual external audit is conducted at the Partnership.

During the audit, the following indicators are checked:

- Adequacy of the Partnership's methods and measures aimed at implementing LBMA guidance recommendations;
- Availability of adequate external and internal risk mitigation measures;
- Compliance with LBMA guidance recommendations in all interactions with gold and precious metals suppliers;
- Ensuring the security of gold and precious metals, having an effective information tracking system for all Partnership activities;
- Continuous risk assessment and timely response to the situation based on such assessments.

The company/persons conducting the Partnership's audit must meet the following criteria:

- Be accredited by LBMA and listed as an LBMA auditor. This list is published on the website www.lbma.org.uk;
- Independence from the Partnership;
- No conflict of interest between the auditor and the Partnership (business or financial relationships);
- Prohibition of providing any other services to the Partnership related to the compliance audit except general recommendations on the matter;
- Competence necessary to conduct such an audit.

The audit process includes the following operations:

- Preparing for the audit, developing a plan;
- On-site inspection with a visit;
- Consulting with the Partnership's risk assessment team;
- Completing the audit: justification, documentation, and reporting on the results indicating the level of compliance of the audited company with LBMA recommendations during the compliance audit;
- Providing the Partnership with recommendations for improving compliance audit methods;
- A brief audit report should be included in the Partnership's annual supply chain compliance audit report.

5. ANNUAL REPORTS

Marketing annually, no later than March 31, prepares a report on the compliance of the responsible supply chain management Policy with LBMA guidance requirements and measures taken.

The report is submitted to the management representative for approval, after which Marketing prepares a general report on the Policy's effectiveness and sends it to LBMA.

Based on the audit results, the Partnership's compliance report and the external auditor's report are published on the Partnership's website.

APPENDIX No. 1/1

COUNTERPARTY QUESTIONNAIRE LLP "Tau-Ken Altyn" PRIMARY GOLD

1. COUNTERPARTY INFORMATION	
Company Name	
Registration Date	
Country of Registration	
Company Website	
External Auditors	
Number of Direct and Indirect Subsidiaries	

2. COMPANY ACTIVITIES	
Type of Activity	<ul style="list-style-type: none"> - Bank - Other Credit-Financial Organization - Production - Wholesale Trade - Other Activities (specify) _____ - Jewelry - Waste Trade - Precious Metal - Coin Trade - Mint Geological Exploration -Prospecting Artel
Volume of Extraction	<ul style="list-style-type: none"> - Over 100,000 ounces per year - From 30,000 to 100,000 ounces per year - Less than 30,000 ounces per year
Description of Main Activity	
Countries of Operation (in % of annual volume)	
License for Activity	
Description of Main Market	
Description of Main Products	

3. BENEFICIAL OWNERS				
SHAREHOLDER(S) (MORE THAN 25%)				
Share (%)	Full Name/ Company Name	Address	Country of Registration/ Citizenship	Registration Date/ Date of Birth
ULTIMATE BENEFICIAL OWNER (MORE THAN 25% - INDIVIDUAL ONLY)				
Share (%)	Full Name	Address	Citizenship	Date of Birth

4. MANAGEMENT STRUCTURE				
	Full Name	Position	Citizenship	Date of Birth
A. BOARD OF DIRECTORS				
B. MANAGEMENT				

5. FINANCIAL INFORMATION			
1.1.FINANCIAL STATEMENT INFORMATION			
Indicator	Currency	Last Reporting Period	Previous Year
Authorized Capital			
Total Capital			
Total Balance Sheet			
Revenue			
Net Profit			

Please provide a copy of the annual financial statement/report.

1.2. OTHER INFORMATION	
Sources of funds for financing mining	- Own Funds ___% - State Funding ___% - Bank Loans ___% - Loans from Other Parties ___% (specify below) _____
Payment Methods Used by the Company	- Bank Transfers ___% - Cash ___% - Other Forms of Payment ___% (explain below) _____

6. REGULATORY ENVIRONMENT	
Does your company have to comply with detailed safety and labor protection requirements according to the legislation of the country and/or region of operation?	
Does your company have to comply with detailed environmental protection requirements according to the legislation of the country and/or region of operation?	
Are child labor regulations applicable to your mining activities according to the legislation of the country and/or region of operation?	
Are public security forces used at or near the mining site?	

7. EMPLOYEES	
Number of Employees in the Company	
Number of Employees in the Group	

8. PHYSICAL ORIGIN OF PRECIOUS METALS	
A) Number of mining sites	
B) Names of mining sites	
C) Exact addresses of mining sites (country, region, nearest city, GPS coordinates)	
D) Distance (in km) from the mining site to the processing center	
E) Is a mining license required according to the law?	Yes _____ No _____ Date of issue: _____ Expiry date: _____
F) Average daily production volume at mining sites	
G) Estimated reserves at mining sites	
H) Number of workers at mining sites	

I) Method of gold extraction	
J) Are sufficient procedures in place to ensure the safety of workers at the mining site (e.g., proper use of protective equipment, safety training, first aid, and emergency procedures)?	Yes _____ – please describe: _____ _____ _____ No _____
K) Are sufficient procedures and systems in place at the mining site to prevent environmental impact during gold extraction (e.g., tailings storage, systems to prevent air and water pollution, etc.)?	Yes _____ – please describe: _____ _____ _____ No _____
L) Does the mining site interact with local authorities and support local area and community development?	Yes _____ – please describe: _____ _____ No _____
M) Are sufficient procedures in place at the mining site to prevent child labor?	Yes _____ – please describe: _____ _____ No _____
N) Are armed groups present at or near the mining site?	Yes _____ Government Forces _____ Non-state Armed Groups _____ Public or Private Security Forces _____ No _____
O) Are professional security services employed by the enterprise to control the mining site?	Yes _____ No _____
P) Has a supervisory authority visited the mining site?	Yes _____, Date of last inspection: _____ No _____
Q) If no inspection has taken place, when is the next inspection scheduled?	Yes _____, Planned inspection date: _____ No _____

9. PROCESSING FACILITIES	
A) Exact location of the gold/silver processing plant (country, region, nearest city, GPS coordinates)	
B) Number of employees at the processing plant	

C) Does the company own the processing plant or is the processing function outsourced?	Company-Owned _____ Outsourced _____ Processor Name: _____
D) If the processing plant is company-owned, does it also process gold and silver for third parties?	Yes _____ Names and locations of third-party mining companies: _____ No _____
E) What processing method is used for gold/silver?	
F) What chemicals are used in processing?	Mercury _____ Cyanide _____ Others (specify): _____
G) Processing plant capacity	
H) Is an export license for precious metals required?	Yes _____, provide a copy Date of issue: _____ Expiry date: _____ No _____ Not applicable _____
I) Are sufficient procedures in place to ensure the safety of workers at the processing plant (e.g., proper use of protective equipment, safety training, first aid, and emergency procedures)?	Yes _____, please describe: _____ _____ _____ No _____
J) Are sufficient procedures and systems in place at the processing plant to prevent environmental impact during gold extraction (e.g., tailings storage, systems to prevent air and water pollution, etc.)?	Yes _____, please describe: _____ _____ _____ No _____
K) Does the processing plant interact with local authorities and support local area and community development?	Yes _____, please describe: _____ No _____
L) Are sufficient procedures in place at the processing plant to prevent child labor?	Yes _____, please describe: _____ No _____
M) Are armed groups present at or near the processing plant?	Yes _____ Government Forces _____ Non-state Armed Groups _____ Public or Private Security Forces _____ No _____

N) Are professional security services employed by the enterprise to control the processing plant?	Yes ____ No ____
MATERIALS	
A) What types of precious metals does the enterprise plan to send for refining?	Gold ____ Silver ____ Others – specify: _____
B) In what form will precious metals be sent for refining?	Concentrate (gold) ____ Concentrate (silver) ____ Ore (gold) ____ Ore (silver) ____ By-product (specify): _____ Other – describe: _____
TRANSPORTATION	
A) How is ore transported from the mining site to the processing plant?	By the company ____ Third party – specify company: _____
B) How is transportation from the processing plant to the export point (port, airport, etc.) carried out?	By the company ____ - By truck _____ - By helicopter _____ - By armored car _____ - By plane _____ - Other – specify: _____ By third party ____ - By truck _____ - By helicopter _____ - By armored car _____ - By plane _____ - Other – specify: _____
C) How will transportation from the export point to the refinery be carried out?	By the company ____ - By truck _____ - By helicopter _____ - By armored car _____ - By plane _____ - Other – specify: _____ By third party ____ - By truck _____ - By helicopter _____ - By armored car _____ - By plane _____ - Other – specify: _____

D) Is there a military post/police checkpoint along the route from the mining site to the export point?	Yes ____, how many and for what purposes:

	No _____

10. POLICY ON RESPONSIBLE SUPPLY CHAINS OF PRECIOUS METALS	
A) Has your company adopted a policy on responsible gold supply chains from conflict-affected and high-risk areas that meets the standards set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?	Yes _____, provide a copy No _____
B) Does your company comply with or plan to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?	Yes _____ No _____
C) Does your company comply with the following industry initiatives? - RJC Chain of Custody Standard - RJC Code of Practices - WGC Conflict-Free Gold Standard - Fair Trade Standard - Fair Mined Standard - Others – specify: _____ Provide a copy of certificates.	
D) What approved procedures ensure that purchased precious metals did not finance conflicts?	

11. ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING	
A) Does your company fall under the requirements of anti-money laundering/counter-terrorism financing legislation?	Yes _____ No _____
B) Name of AML/CTF Law/Regulation	
C) Name of Regulator	
D) Has your company established a compliance program containing AML/CTF policies and procedures in accordance with internal and international laws, rules, and standards?	Yes _____, provide a copy No _____
E) Are the company's management, participants, and ultimate beneficiaries listed on sanction lists?	Yes _____, specify No _____

12. ANTI-BRIBERY POLICY	
A) Has your company adopted an anti-bribery policy?	Yes _____, provide a copy No _____
B) Has the company's senior management ever been accused anywhere in the world of violating anti-bribery laws and regulations?	Yes _____, provide information No _____

Comments / Additional Information (refer to question):

SIGNATURE

I hereby confirm that the above information is accurate as of the date of signing.

I commit to informing LLP "Tau-Ken Altyn" of any changes.

	Authorized Signatory
Signature	
Full Name	
Position	
Organization	
Date, Place	

(Stamp)

APPENDIX No. 1/2

COUNTERPARTY QUESTIONNAIRE LLP "Tau-Ken Altyn" SECONDARY GOLD

1. COMPANY INFORMATION	
A) Company Name	
B) Registered Address	
C) Actual Business Address	
D) Phone Number	
E) Date of Establishment	
F) Country of Establishment	
G) Registration Number	
H) Taxpayer Registration Number	
I) Exchange Registration Number (if applicable)	
J) Company Website	
K) External Auditor of Financial Statements	
L) Number of Subsidiaries in Direct and Indirect Ownership (provide group structure)	

2. COMPANY ACTIVITIES	
A) Type of Activity	Bank _____ Precious Metal Trader _____ Other Financial Intermediation _____ Industry _____ Wholesale Trade _____ Jewelry _____ Scrap Trade _____ Coin Trade _____ Mint _____ Other – specify: _____
B) Description of Main Activity	
C) Does the company have licenses to conduct activities? Provide copies	
D) Main Markets	
E) Main Products	

3. BENEFICIAL OWNERS				
SHAREHOLDER(S) (MORE THAN 25%)				
Share (%)	Full Name/ Company Name	Address	Country of Registration/ Citizenship	Registration Date/ Date of Birth
ULTIMATE BENEFICIAL OWNER (MORE THAN 25% - INDIVIDUAL ONLY)				
Share (%)	Full Name	Address	Citizenship	Date of Birth

4. MANAGEMENT STRUCTURE				
	Full Name	Position	Citizenship	Date of Birth
C. BOARD OF DIRECTORS				
D. MANAGEMENT				

5. FINANCIAL INFORMATION			
	Currency	Last Reporting Period	Previous Year
Authorized Capital			
Total Capital			
Total Balance Sheet			
Revenue			
Net Profit			

Please provide a copy of the latest annual report.

6. LABOR RESOURCES	
Number of Employees in the Company	
Number of Employees in the Group	

7. PHYSICAL ORIGIN OF PRECIOUS METALS	
Profile of Precious Metal Suppliers (individuals/organizations)	
Country (countries) of Origin of Precious Metals Supplied to the Company	
Countries of Destination for Refined Precious Metals	
Is an import license required for the company?	Yes _____, provide a copy No _____ Not applicable _____
Is an export license required for the company?	Yes _____, provide a copy No _____ Not applicable _____

8. TECHNICAL FACILITIES (EQUIPMENT)	Yes	No	N/A
A) Does the company have smelting or refining facilities?			
B) Does the company have other production facilities?			
C) Does the company produce its own jewelry?			
D) What types, forms, and contents of precious metals are purchased by the company?			
_____ Unprocessed Secondary Precious Metals (%__)			
_____ LBMA GD Gold Bars			
_____ Semi-finished Bars			
_____ Coins			
_____ Non-LBMA GD Gold Bars (gold > 995, silver > 9999)			
_____ Jewelry			
_____ Scrap			
_____ Jewelry Scrap			
_____ Other – specify: _____			
E) What types of metals does the company plan to send for refining?			
_____ Gold			
_____ Silver			
_____ Other, specify: _____			

F) What form will precious metals sent for refining take?

Unprocessed Secondary Precious Metals (% ___)
 LBMA GD Gold Bars
 Semi-finished Bars
 Coins
 Non-LBMA GD Gold Bars (gold > 995, silver > 9999)
 Jewelry
 Scrap
 Jewelry Scrap
 Other – specify: _____

 Melted Secondary Precious Metals (% ___)
 Semi-finished Bars (undefined sizes and shapes)
 Other, specify: _____

9. RESPONSIBLE SUPPLY CHAIN MANAGEMENT

A) Has your organization adopted a policy on responsible gold supply chains from conflict-affected and high-risk areas that meets the standards set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?

Yes _____, provide a copy
 No _____

B) Does your organization comply with or plan to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?

Complies _____
 Plans to Comply _____
 No _____

C) What procedures have been implemented to ensure that purchased precious metals did not finance armed conflicts?

10. ANTI-MONEY LAUNDERING (AML) AND COUNTER-TERRORISM FINANCING (CTF)

A) Does your company fall under the requirements of AML/CTF legislation?	Yes _____ No _____
B) Name of AML/CTF Law/Regulation	
C) Name of Regulator	
D) Has your company established a compliance program containing AML/CTF policies and procedures in accordance with internal and international laws, rules, and standards?	Yes _____, provide a copy No _____
E) Are the company's management, participants, and ultimate beneficiaries listed on sanction lists?	Yes _____, specify No _____

11. ANTI-BRIBERY POLICY

A) Has your company adopted an anti-bribery policy?	Yes _____, provide a copy No _____
B) Has the company's senior management ever been accused anywhere in the world of violating anti-bribery laws and regulations?	Yes _____, provide information No _____

12. DATA PROTECTION POLICY

A) Does your organization have a data protection policy?	Yes _____ No _____
B) Does your organization have a designated data protection officer?	Yes _____ No _____
C) Does your organization have a certified data storage system or information system?	Yes _____ No _____

13. SUPPORTING SUPPLIER DUE DILIGENCE	Yes	No	N/A
<p>A) Does the company have a designated specialist (controller) responsible for all AML/CTF issues (due diligence, AML policies, internal training)? If yes, please provide their full name, phone number, and email address.</p>			
<p>B) Does the company conduct AML/CTF compliance audits by an independent auditor or government authorities? Date of last AML/CTF compliance audit.</p>			
<p>C) Does the company have an employee training program on AML/CTF?</p>			
<p>C) Does the company outsource any AML/CTF compliance functions to third parties? If yes, what functions and to which company?</p>			
<p>E) How long does the company retain information (documents) related to due diligence?</p>			

SUPPLIER DUE DILIGENCE	Yes	No	N/A
F) Describe your precious metal suppliers.			
- Legal Entities (%)			
- Individuals (%)			
<p>G) What type of information does the company request from its precious metal suppliers? (yes/no)</p> <p><u>For organizations:</u> Company name Address Registration date Country of registration Charter or equivalent document Beneficial owners Sources of precious metals Description of main activities and financial information</p> <p><u>For individuals:</u> Full name Address Date of birth Nationality Passport details and copy Sources of precious metals Supplier profile (activities, wealth, etc.)</p>			
H) Does the company have a supplier risk assessment procedure (e.g., low, medium, high-risk levels)?			
I) Does the company check suppliers and their operations against a list of sanctioned entities, organizations, or countries issued by government/competent authorities?			
J) Does the company conduct due diligence procedures for high-risk suppliers?			
K) Does the company evaluate suppliers' AML/CTF procedures and practices and their procurement procedures and practices?			

OPERATION MONITORING	Yes	No	N/A												
L) Does the company have a risk assessment procedure to understand suppliers' usual and expected operations (for identifying unusual operations)?															
M) Does the company have a monitoring program for unusual and potentially suspicious activities, including fund transfers and monetary instruments (e.g., travelers' checks) or payments to third parties?															
N) Does the company keep a register of all purchases and sales?															
O) Who are the company's usual precious metal suppliers and what is the average purchase volume? <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr> <th style="text-align: left;">Supplier Type</th> <th style="text-align: left;">Purchase Share (%)</th> <th style="text-align: left;">Average Purchase Value (USD)</th> </tr> </thead> <tbody> <tr> <td>Banks</td> <td></td> <td></td> </tr> <tr> <td>Companies</td> <td></td> <td></td> </tr> <tr> <td>Individuals</td> <td></td> <td></td> </tr> </tbody> </table>				Supplier Type	Purchase Share (%)	Average Purchase Value (USD)	Banks			Companies			Individuals		
Supplier Type	Purchase Share (%)	Average Purchase Value (USD)													
Banks															
Companies															
Individuals															
P) What payment method does the company usually use for settlements with precious metal suppliers? <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr> <th style="text-align: left;">Payment Type</th> <th style="text-align: left;">Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Bank transfer</td> <td></td> </tr> <tr> <td>Check</td> <td></td> </tr> <tr> <td>Cash</td> <td></td> </tr> </tbody> </table>				Payment Type	Percentage (%)	Bank transfer		Check		Cash					
Payment Type	Percentage (%)														
Bank transfer															
Check															
Cash															
Q) Does the company have a procedure to prevent, detect, and report suspicious transactions with suppliers to the relevant authorities?															
R) How many suspicious transaction reports has the company submitted to the relevant authorities in the past two years?															
S) Does the company have established internal or legislative limits for transactions with cash? If yes, what is the limit? _____															
T) Does the company have a procedure to identify transactions structured to avoid reporting requirements?															

14. OPERATION MONITORING WHEN PURCHASING FROM INDIVIDUALS <i>- FILLED OUT ONLY BY COMPANIES PURCHASING PRECIOUS METALS FROM INDIVIDUALS</i>	Yes	No	N/A
A) Does the company keep statistics on purchases of precious metals from individuals to identify suspicious transactions?			
B) Does the company have a specific procedure for transactions with individuals if the amount significantly exceeds the average transaction amount? If yes, please comment: _____ _____ _____			
D) Can the company verify that an individual is not conducting multiple simultaneous small transactions to sell/buy a substantial amount of precious metal ("smurfing")? If yes, how? _____ _____ _____			

15. PURCHASES BY INDUSTRIAL COMPANIES - <i>FILLED OUT ONLY BY INDUSTRIAL COMPANIES</i>	Yes	No	N/A
A) What types of metals does the company purchase for industrial purposes? <input type="checkbox"/> LBMA GD Bars <input type="checkbox"/> Non-LBMA GD Bars (gold > 995, silver > 9999) <input type="checkbox"/> Granules <input type="checkbox"/> Semi-finished Products <input type="checkbox"/> Industrial Products – describe: _____ <input type="checkbox"/> Other – describe: _____ _____			
B) In which countries does the company purchase industrial products?			
C) What is the source of the purchased precious metal products? <input type="checkbox"/> Refining Plants <input type="checkbox"/> Precious Metal Traders <input type="checkbox"/> Banks <input type="checkbox"/> Industrial Companies <input type="checkbox"/> Other – specify: _____ _____			

D) Have you identified the refining enterprise that produces the precious metals used in your supply chain?			
E) Have you evaluated the policies and practices of the refining enterprise regarding supplier verification?			

SIGNATURE

I hereby confirm that the above information is accurate as of the date of signing.

I commit to informing LLP "Tau-Ken Altyn" of any changes.

	Authorized Signatory
Signature	
Full Name	
Position	
Organization	
Date, Place	

(Stamp)

APPENDIX No. 2

LEGAL ENTITY OR INDIVIDUAL ENTREPRENEUR QUESTIONNAIRE

<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Client Client representative Beneficiary	
Full name (for SP – last name, first name, patronymic name)		
Abbreviated name (if any) (for SP - passport information: serial number, number, issuing authority, date of issue)		
Name in foreign language (if any)		
Business identification number (BIN) (for a non-resident - foreign company code)		
Registering authority		
Registration date		
Place of state registration (locality)		
Common Classifier of Economic Activity (codes are separated by commas)		

Bank name	
Settlement account number	
Correspondent account number	
BIC of the bank	
Amount of the authorized (joint) capital or the size of the authorized fund of the company	
License (permission) Date of issue. Validity. Issuing authority	
Legal address (location of the executive body: zip code, locality, street, building, office; for SP - registration address)	
Postal address (location of the executive body: zip code, locality, street, building, office). Specify if it is the same.	
Information about the management bodies of legal entity: Structure (collegial, sole executive body). Personal composition (Last name, first name, patronymic name)	
Information about the presence of legal entity (its standing management body, other body or person with the right to act on behalf of the legal entity without a power of attorney) at the address (<u>underline as appropriate</u>)	
Contact telephone number, fax (with area code)	

Information about the beneficial owner of the legal entity: Date and number of the document confirming the relevant powers	
Legal address Postal address	

Person who filled out the questionnaire on paper

signature

APPENDIX No. 3

COUNTERPARTY ASSESSMENT FORM

Counterparty	
Country of registration of the Counterparty	
Responsible manager for working with the counterparty	

1. Brief description of the origin of precious metals and the organization of the supply system

2. High degree risk criteria

<input type="checkbox"/> Gold mined or processed originates from, has arrived or has been transported from conflict-affected regions or regions with high risks of human rights violations.
<input type="checkbox"/> It is stated that the mined gold comes from a country with limited explored reserves of resources or levels of gold mining.
<input type="checkbox"/> Refined gold originates from a country known as a conflict-affected region or with high risks of human rights violations. Or there are reasonable suspicions to consider the country of origin as such.
<input type="checkbox"/> Gold supplier-counterparty or another well-known mining company is located in countries with a high risk of activities related to money laundering, level of crime or corruption.
<input type="checkbox"/> Gold supplier-counterparty or another well-known mining company or beneficiary are influential political figures.
<input type="checkbox"/> Gold supplier-counterparty or another well-known mining company actively engages in high-risk business activities such as military industry, gaming (casino) industry, trade of antiques or art, trade of diamonds, participation in or management of sects.

3. Level of business collaboration risk

HIGH MEDIUM LOW

Rationale:

4. Confirmation

Date Name

- Responsible manager for working with the counterparty _____
- Marketing _____
- Management representative _____

5. Procedure for reviewing the decision made

Date of next review:

Notes:

Risk level:

- HIGH MEDIUM LOW

Marketing _____
signature

Management representative _____
signature

APPENDIX No. 4

INDICATORS OF UNUSUAL TRANSACTIONS

WITH GOLD AND PRECIOUS METALS THAT MAY BE RELATED

TO CONFLICTS OR SERIOUS LEGAL VIOLATIONS IN MINING,

TRANSPORTATION, AND/OR TRADING.

1. Unmotivated refusal by the client to provide information (beyond established regulatory documents) but requested according to established practice including about his trustee (in the case when the client acts as a representative of a legal or physical person) or beneficiary as well as excessive concern of the client about confidentiality regarding the transaction being conducted.

2. The presence of non-standard or unusually complex schemes for conducting calculations differing from normal market practice.

3. The client's proposal to return the amount due from a terminated deal to third parties including to an account in a non-resident bank or to their own account in a bank different from the bank from which the funds initially came for this transaction.

4. Inclusion in the transaction (deal) of additions and changes not corresponding to established practice.

5. Unjustified haste in conducting the transaction insisted upon by the client.

6. The counterparty's introduction of significant changes directly before the start of its implementation concerning the direction of movement of funds or precious metals, jewelry made from them, and scrap of such items.

7. The counterparty's instruction to carry out the transaction through a representative (intermediary) if the representative (intermediary) performs the client's instruction without entering into direct (personal) contact with the Partnership.

8. Difficulties arising during the verification of information provided by the counterparty, unjustified delays in the provision of documents and information by the client about the transaction (deal), presentation by the counterparty of information that cannot be verified or such verification is too costly.

9. The impossibility of establishing the partners of the counterparty.

10. The counterparty's insistence on conducting calculations in cash.

11. Use of accounts opened in various credit organizations for calculations within one contract.

12. The participant in the transaction with funds or other property is registered in a state or territory providing a preferential tax regime for taxation and (or) not providing for disclosure

and provision of information when conducting financial transactions (offshore zone) or his account is opened in a bank registered in the stated state or territory.

13. Unmotivated demand by the counterparty for termination of the contract and/or return of the funds paid by the counterparty before the actual implementation of the transaction.

14. The conduct of settlements between the parties to the transaction using the current accounts of third parties through unofficial banking systems using cash.

15. The lack of an obvious connection between the nature and type of activity of the counterparty with the services for which the counterparty turns to the Partnership.

16. The convoluted or unusual nature of the transaction not having an obvious economic sense or obvious lawful purpose.

17. The transaction's inconsistency with the organization's activity goals established by its founding documents.

18. The detection of multiple operations or transactions the nature of which gives reason to believe that their purpose is to evade the mandatory control procedures provided by the legislation of the Republic of Kazakhstan.

19. Transferring funds at the instruction of the counterparty for precious stones, jewelry made from them, and scrap of such items to the accounts of third parties.

20. The unmotivated refusal of the organization carrying out operations with precious metals and precious stones, jewelry made from them, and scrap of such items in providing documents confirming their registration in special accounting registers in the Republic of Kazakhstan or copies of these documents.

21. The seller's presentation during the purchase-sale of standard and/or measured ingots made from refined precious metals instead of originals copies of documents on quality (passport or certificate) as well as specifications for them.

22. Deviation of the cost of precious metals, precious stones, jewelry made from them, or household items made from scrap or other household items made from scrap and waste within the contract by more than 20 percent upward or downward from market price levels.

23. The sale of products (bars, rods, wires, plates, strips, sheets, etc.) made from standard and/or measured ingots of refined precious metals without changing their chemical composition.

24. Receiving a batch (batches) of jewelry and/or other household items made from precious metals and precious stones with possibly fake impressions of assay marks with unregistered impressions of manufacturers' names and/or without impressions of state assay marks.

Indicators of unusual transactions whose implementation may be aimed at financing terrorism.

25. The participant in the operation (transaction) as well as the beneficiary in the operation (transaction) is a person excluded from the List of organizations and persons associated with financing terrorism and extremism (hereinafter - the List). The List is compiled and maintained by the Committee for Financial Monitoring of the Ministry of Finance of the Republic of Kazakhstan in accordance with Article 12 of the Law of the Republic of Kazakhstan "On combating the legalization (laundering) of proceeds obtained by criminal means and financing of terrorism".

26. The participant in the operation (transaction) as well as the beneficiary and beneficial owner in the operation (transaction) is a close relative of a person included in the List or excluded from it.

27. The registration address (location or place of residence) of the participant in the operation (transaction) the beneficiary in the operation (transaction) coincides with the registration address (place of location or place of residence) of a person included in the List or excluded from it.

28. Operations involving cash or other property carried out by a person newly included in the next edition of the List before his re-inclusion in the List.

29. The participant in the operation (transaction) as well as the beneficiary and beneficial owner in the operation (transaction) has a registration place of residence or place of location in a country/region/entity with a high degree of risk of terrorist and extremist manifestations interethnic conflicts armed clashes and military operations.

30. The conduct of settlements in the operation (transaction) using Internet technologies electronic payment systems alternative money transfer systems or other remote-format systems in (from) a country/region/entity with a high degree of risk of terrorist and extremist manifestations inter-ethnic conflicts armed clashes and military operations.

31. Operations involving the expenditure of funds by Kazakhstani public organizations and associations (religious organizations political parties organizations associations) and foundations not corresponding to the purposes provided by their founding documents.

32. Operations involving the expenditure of funds by Kazakhstani branches offices and representatives of foreign non-profit non-governmental organizations not corresponding to the declared purposes.

33. Operations involving the receipt and expenditure of funds by foreign non-profit non-governmental organizations public associations political parties and religious organizations and foundations as well as their branches and representatives carrying out their activities in the territory of the Republic of Kazakhstan.

34. Operations involving leaders founders or employees (if such information is available) of public organizations and associations (religious organizations political parties organizations associations) funds foreign non-profit non-governmental organizations their branches and representatives carrying out their activities in the territory of the Republic of Kazakhstan.

35. The declared origin of gold and precious metals from the country or territory of the Republic of Kazakhstan where reserves or potential undeveloped reserves are known or the expected volume of production of these metals is small (i.e., the declared volumes of gold and precious metals from this territory exceed its known reserves and (or) potential production volumes);

36. The declared origin of gold and precious metals obtained from secondary raw materials/scrap or mixed sources and processed in a country through which as is known or assumed gold and precious metals transit conflict zones or areas of increased risk.

37. The supplier and other companies engaged in mining and processing of gold and precious metals conduct activities in one of the risk-related territories associated with the origin or transit of gold and precious metals or have shareholders or other persons from the aforementioned territories financially interested in their activities:

38. Other criteria and signs at the discretion of the Partnership.