**LBMA Questionnaire – Mined Material**

**LBMA问卷 – 矿产原料**

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| 1. **COMPANY DETAILS 公司详情**
 |
| 1. **Name 名 称**
 |  |
| 1. **Registered Address 注册地址**
 |  |
| 1. **Business Address 办公地址**
 |  |
| 1. **Phone Number 电话号码**
 |  |
| 1. **Date of Incorporation 注册成立日期**
 |  |
| 1. **Country of Incorporation 注册所在国**
 |  |
| 1. **Business Registration Number**

**商业登记号码** |  |
| 1. **Tax Identification/Registration Number**

**税务识别码/注册号** |  |
| 1. **If listed, indicate name of stock exchange(s) and ticker**

**如果是上市公司，交易所的名称和股票名称** |  |
| 1. **Website**

**网站地址** |  |
| 1. **External Financial Auditors**

**外部财务审计公司Since Date** **从何时开始负责审计** |  |
| 1. **How many direct and indirect subsidiaries does the company have?**

**有多少直接或间接子公司？***Please provide a Group chart**请提供集团组织结构图* |  |

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| 1. **BUSINESS ACTIVITY 业务活动**
 |
| 1. **Type Of Business**

**业务类型** |

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| --- | --- | --- | --- |
| Large scale mine (>100’000 oz/year)大型矿山（大于十万盎司/年） | [ ]  | Precious Metals trader贵金属交易 | [ ]  |
| Medium scale mine (30-100’000 oz/year)中型矿山（三万至十万盎司/年） | [ ]  | Others, please specify: 其他类型，请注明 | [ ]  |
| Small scale mine (<30’000 oz/year)小型矿山（小于三万盎司/年） | [ ]  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
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| 1. **Description of Core Business Activity**

**核心业务活动描述** |  |
| 1. **In which country/ies do you currently refine your precious metals?**

**目前在哪个/些国家进行你们 的贵金属精炼？** |  |

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| 1. **BENEFICIAL OWNERS 受益所有权人**
 |
| **SHAREHOLDER(S) (MORE THAN 25%) 股东（持有超过25%）** |
| **Percentage Holding (%)****持股百分比** | **Name 名称 Address 地址** | **Country of Incorporation/****Nationality(ies)****注册所在国/国籍** | **Date of Incorporation/****Date of Birth****成立时间/生日** |
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| **ULTIMATE BENEFICIAL OWNER (MORE THAN 25% - INDIVIDUAL ONLY)****最终受益所有权人（持有超过25%，仅限个人 ）** |
| **Percentage Holding (%)****持股百分比** | **Name名称 Address 地址** | **Nationality(ies)****国籍** | **Date of Birth****生日** |
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| 1. **MANAGEMENT STRUCTURE 管理层结构**
 |
|  | **Names 姓名** | **Title 职务** | **Nationality(ies)****国籍** | **Date of Birth****生日** |
| 1. **Board of Directors**

**董事会** |  |  |  |  |
| 1. **Top Management**

**高管层** |  |  |  |  |

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| 1. **FINANCIAL INFORMATION 财务情况**
 |
| **5.1 Financial statements details 财务报表详情** |
|  | **Currency****货币** | **Last Reporting Period****本期** | **Previous Year****上期** |
| 1. **Share Capital**

**股本** |  |  |  |
| 1. **Total Shareholder’s Equity**

**股东权益总额** |  |  |  |
| 1. **Total Balance Sheet**

**资产负债表总额** |  |  |  |
| 1. **Sales**

**销售额** |  |  |  |
| 1. **Net Income**

**净收入额** |  |  |  |
| *Please provide copy of latest annual report**请提供一份最新的年报* |

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| **5.2 Other Financial Information 其他财务信息** |
| 1. **Source of mining operation funding**

**采矿作业资金来源** | [ ]  Own equity  自有资金 [ ]  Government entity, name(s):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 政府机构，该（些）机构名称：[ ]  Bank loan, name(s):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 银行贷款，银行名称：[ ]  Other third party loan, name(s):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 其他第三方贷款，第三方机构名称: |
| 1. **What usual payment method does the Company use to pay its suppliers?**

**公司向供应商付款的付款方式通常是什么？** |

|  |  |
| --- | --- |
| Payment type付款类型 | Percentage (%) 百分比 |
| Bank transfers银行转账 |  |
| Checks支票 |  |
| Cash现金 |  |

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| 1. **REGULATORY ENVIRONMENT 监管环境**
 | **YES****是** | **NO****否** | **N/A****不适用** |
| 1. **Does your Company need to comply with detailed health and safety regulations in the country/province of operations?**

**你公司的业务活动是否需要详尽地遵守所在国/省健康和安全监管规则？** |  |  |  |
| 1. **Does your Company need to comply with detailed environmental regulations in the country/province of operations?**

**你公司的业务活动是否需要详尽地遵守所在国/省环保监管规则？** |  |  |  |
| 1. **Is child labour regulated in mining activity in the country/province of operations?**

**在业务活动的国家/省是否监管使用童工行为？** |  |  |  |
| 1. **Are public security forces used on or around the mine site?**

**是否在采矿区或采矿区周边使用公共安全部队？** |  |  |  |

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| 1. **HUMAN RESOURCES 人力资源**
 |
| 1. **Number of employees within the Company**

**公司内雇员人数** |  |
| 1. **Number of employees within the Group**

**集团内雇员人数** |  |

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| 1. **ORIGIN OF PHYSICAL PRECIOUS METALS, CAPACITY AND MINING PRACTICES**

**实物贵金属的原产地、产能和采矿实践情况** |
| 1. **From how many mining site(s) is the gold/silver extracted?**

**黄金/白银开采自几个采矿区？** |  |
| 1. **Name of the mining site(s):**

**采矿区名称** |  |
| 1. **Where exactly is the mining site(s) located (country, province, closest city, GPS coordinate)?**

**采矿区准确的坐落地点在哪里？（国家，省，最近的城市，GPS坐标）？** |  |
| 1. **In which perimeter (km) around the centre of operation/processing plant is the mining site(s) located?**

**采矿区/加工场周长有多少公里?** |  |
| 1. **Is the mining site(s) legally required to hold a mining license?**

**法律法规是否要求采矿区持有采矿许可证？***Please provide a copy/ies**请提供一份* | [ ]  Yes 是 [ ]  No 否Date of issue: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_签发日期Expiry date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_到期日 |
| 1. **What is the daily production of the mining site(s)?**

**采矿区的日产量是多少？** |  |
| 1. **What are the estimated reserves of the mining sites(s)?**

**采矿区的估计储量是多少?** |  |
| 1. **How many people are working on the mining site(s)?**

**采矿区有多少工作人员？** |  |
| 1. **What is the gold extraction method (mining equipment & methods)?**

**提取黄金的方法是什么？（采矿装备和采矿方法）** |  |
| 1. **Are there comprehensive procedures and systems to guarantee the safety of personnel at the mining site (such as use of proper protective equipment, health and safety training, first aid materials and emergency procedures)?**

**是否有全面的程序和机制来保证采矿区内人员的安全？（例如：使用合适的保护装备、健康和安全培训、急救材料和应急措施）** | [ ]  Yes, please describe: 是的，描述如下：[ ]  No 否 |
| 1. **Are there comprehensive procedures and systems at the mining site to avoid negative impact to the environment by gold extraction (such as adequate tailing treatment, system to avoid pollution emission, etc)?**

**采矿区是否有全面的程序和机制来避免提取黄金对环境造成负面影响？（例如:充分的尾矿处理、避免污染排放系统等）** | [ ]  Yes, please describe: 是的，描述如下：[ ]  No **否** |
| 1. **Does the mining site engage with affected communities and support local community development?**

**采矿区是否与受采矿影响社区建立良好关系，并支持当地社区发展？** | [ ]  Yes, please describe: 是的，描述如下：[ ]  No 否 |
| 1. **Is there a comprehensive procedure at the mining site to ensure prevention of child labour?**

**在采矿区是否有全面的程序确保防范使用童工？** | [ ]  Yes, please describe:是的，描述如下：[ ]  No 否 |
| 1. **Are there any armed groups stationed on/near the mine site?**

**If yes, please provide information as to the reason:****采矿区内或周边是否驻扎有武装力量？****如果有，请提供相关信息和理由** | [ ]  Yes 是[ ]  State Armed group 国家武装力量[ ]  Non State Armed Group 非国家武装力量[ ]  Public or private security forces 公共或私人安保力量------------------------------------------------------------------------------------------------[ ]  No 否 |
| 1. **Does the Mining Company employ professional security forces to control the mine site?**

**采矿公司是否雇佣专业的安保力量来控制采矿区？** | [ ]  Yes 是 [ ]  No 否 |
| 1. **Has the Regulator responsible for mining operations carried out an on-site visit**

**监管人员是否对采矿运营进行过实地考察？** | [ ]  Yes, date of last visit:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 是，最近一次考察的时间是：[ ]  No 否 |
| 1. **If no on-site visit has been performed yet (question 8p above), is there any visit planned?**

**如果没有进行过实地考察，是否有任何考察计划？** | [ ]  Yes, date of planned visit:\_\_\_\_\_\_\_\_\_\_\_\_ 是，计划好的考察日期是:[ ]  No 否 |

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| 1. **PROCESSING PLANT 加工厂**
 |
| 1. **Where exactly is the gold/silver processing plant(s) located (country, province, closest city, GPS coordinate)?**

**黄金/白银加工厂的准确位置是哪里？（国家，省，最近的城市，GPS坐标）** |  |
| 1. **How many people are working in the gold/silver processing plant?**

**黄金/白银加工厂有多少工作人员？** |  |
| 1. **Is the gold/silver processing plant held by the mining company or is it outsourced to an external party?**

**黄金/白银加工厂是由采矿公司兴办的还是由外部方承包的？** | [ ]  Mining company processing plant 采矿公司加工厂[ ]  Gold/silver processing outsourced to an external plant 黄金/白银加工外包给外部方 Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 外部方名称 |
| 1. **If the Mining Company has its own processing plant, does it also source mined gold/silver for processing from external parties?**

**如果采矿公司拥有自己的加工厂，加工厂是否也从外部方进矿产黄金/白银原料进行加工？** | [ ]  Yes Name and location of mining sites: 是 采矿区名称和地点：\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_[ ]  No 否 |
| 1. **What is the gold/silver processing method (processing equipment & methods)?**

**使用的黄金/白银加工方法是？（加工装备和方法）** |  |
| 1. **What chemical products are used during processing?**

**加工过程中使用的化学产品是什么？** | [ ]  Mercury 水银[ ]  Cyanide 氰化物[ ]  Others, please specify:\_\_\_\_\_\_\_\_\_\_\_\_ 其他，请列出： |
| 1. **What is the capacity of the processing plant per day?**

**加工厂一天的产能是多少？** |  |
| 1. **Is your Company legally required to have a license to export precious metals?**

**法律法规是否要求你公司持有贵金属出口许可证？** | [ ]  Yes – Please provide a copy 是的，请提供一份复印件Date of issue: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_签发日期Expiry date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_到期日[ ]  No 否[ ]  N/A 情况不适用 |
| 1. **Are there any comprehensive procedures and system to guarantee the safety of personnel in the processing plant (such as use of proper protective equipment, health and safety training, first aid materials and emergency procedures)?**

**是否有全面的程序和机制保证加工厂内全体人员的安全？（例如：使用适当的保护装备、健康和安全培训、急救材料和紧急措施）** | [ ]  Yes, please describe: 是，请描述：[ ]  No 否 |
| 1. **Does the processing plant have comprehensive processes to avoid negative impact to the environment by gold/silver processing (such as adequate tailing treatment, system to avoid pollution emission, etc)?**

**加工厂是否有全面的程序来避免黄金/白银加工对环境造成负面影响？（例如：恰当的尾矿处理、避免污染排放系统等）** | [ ]  Yes, please describe: 是，请描述[ ]  No 否 |
| 1. **Does the processing plant engage with affected communities and support local community development?**

**加工厂是否与受加工影响社区建立良好关系，并支持当地社区发展？** | [ ]  Yes, please describe 是，请描述[ ]  No 否 |
| 1. **Does the processing plant have a comprehensive procedure to ensure prevention of child labour?**

**加工厂是否有全面的程序来确保防范雇佣童工？** | [ ]  Yes, please describe 是，请描述[ ]  No 否 |
| 1. **Is there any armed groups stationed on/near the processing plant?**

**加工厂内或周边是否驻扎有武装力量？** | [ ]  Yes 是[ ]  State Armed group 国家武装力量[ ]  Non State Armed Group 非国家武装力量[ ]  Public or private security forces 公共或私人安保力量[ ]  No 否 |
| 1. **Does the processing plant employ professional security forces to control the plant**

**加工厂是否雇佣专业安保力量来控制加工厂？** | [ ]  Yes  是[ ]  No 否 |

|  |
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| **MATERIALS 原料** |
| 1. **What type of precious metals is the Company planning to send for refining?**

**公司正在计划送去精炼的贵金属原料类型是？**

|  |  |  |
| --- | --- | --- |
| [ ]  Gold [ ]   | Silver | [ ]  Others, please specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  [ ]  黄金 [ ]  白银 |  |  其他，请指明： |

  |
| 1. **What is the form of precious metals planned to be sent for refining?**

**计划送去精炼的贵金属原料是那种类型？**

|  |  |
| --- | --- |
| [ ]  Gold concentrate 金精矿 | [ ]  Mining by-product 采矿副产品 |
| [ ]  Silver concentrate 银精矿 | [ ]  Others, please specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 其他，请指明： |
| [ ]  Gold ore 金矿石[ ]  Silver ore 银矿石 |  |

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| **Transportation 运输** |
| 1. **How is the ore transported from the mining sites to the processing plant?**

**矿石是如何从采矿区运输至加工厂的？**

|  |
| --- |
| [ ]  By your company 公司自行运输 |
| [ ]  By a third party (external company), which company? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 由第三方运输（外部公司），哪家公司？ |

 |
| 1. **How is the ore transported from the processing plant to the export location?**

**矿石是如何从加工厂运输至出口地点的?**

|  |
| --- |
| [ ]  By your company 公司自行运输 |
| [ ]  Truck 卡车 | [ ]  Helicopter 直升机 | [ ]  Armoured vehicle 装甲车 | [ ]  Fixed wing aircraft  固定翼飞机 |
| [ ]  Others, please specify 其他，请指明：\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |  |
| [ ]  By a third party (external company), which company? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 通过第三方（外部公司），哪家公司？： |
| [ ]  Truck 卡车 | [ ]  Helicopter 直升机 | [ ]  Armoured vehicle 装甲车 | [ ]  Fixed wing aircraft  固定翼飞机  |
| [ ]  Others, please specify其他，请指明：\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |  |

 |
| 1. **How will the ore be transported from the export location to the refinery?**

**矿石是如何从出口点运输至精炼厂的？**

|  |
| --- |
| [ ]  By your company 公司自行运输 |
| [ ]  Aircraft 空运 | [ ]  Boat 船运 | [ ]  Armoured vehicle 装甲车 | [ ]  Others, please specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_其他，请指明： |
| [ ]  By a third party (external company), which company? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 通过第三方（外部公司），哪家公司》： |
| [ ]  Aircraft 空运 | [ ]  Boat 船运 | [ ]  Armoured vehicle 装甲车 | [ ]  Others, please specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_其他，请指明： |
|  |  |  |  |

 |
| 1. **Is there any military/police checkpoint along the road from the mining site until the export location?**

**从采矿区至出口点的路上是否有军队/警察检查站？** | [ ]  Yes 是If yes, how many and for what purpose? 如果是，有多少个，检查目的是什么？\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_[ ]  No 否 |

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| 1. **RESPONSIBLE PRECIOUS METAL SUPPLY CHAIN POLICY**

**负责任的贵金属供应链政策** |
| 1. **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**](http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf)

**你公司是否建立了符合OECD标准的冲突影响和高风险地区负责任的黄金供应链政策？（标准详见，冲突影响和高风险地区负责任的矿产供应链尽职调查指南**[**http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf**](http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf)**）** | [ ]  Yes **– Please provide a copy** 是，请提供一份政策资料[ ]  No 否 |
| 1. **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?**

**你公司是否遵守或计划遵守****OECD冲突影响和高风险地区负责任的矿产供应链尽职调查指南？** | [ ]  Yes 是 [ ]  No 否 |
| 1. **Does your company comply with any of the following industry initiatives:**

**你公司是否遵守下列任何行业举措？**

|  |  |
| --- | --- |
| [ ]  | RJC Chain of Custody StandardRJC产销监管链标准  |
| [ ]  | RJC Code of PracticesRJC工作守则 |
| [ ]  | WGC Conflict Free Gold StandardWGC无冲突黄金标准 |
| [ ]  | Fair Trade Standard公平交易标准 |
| [ ]  | Fair Mined Standard合理采矿标准 |
| [ ]  | Others, please specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_其他，请指明：*Please provide a copy of the certification**请提供相关证书复印件* |

 | Additional comments:备注 |
| 1. **What are the procedures in place to ensure that the precious metals purchased have not financed conflict?**

**你公司采取哪种适当的措施来确保采购贵金属而没有资助冲突？** |  |

|  |
| --- |
| 1. **ANTI MONEY LANDERING (AML) – COMBATING FINANCIAL TERRORISM (CFT)**

**反洗钱（AML）-反资助恐怖主义（CFT）** |
| 1. **Is your company subject to Anti-Money Laundering/Combating financial terrorism Law/Regulation?**

**你公司是否受反洗钱和反资助恐怖主义法律法规监管?** | [ ]  Yes – Please fill in the Wolfsberg questionnaire attached 是的，请填写后附的沃尔斯伯格调查表[ ]  No 否 |
| 1. **Name of the AML-CFT Law/Regulation**

**反洗钱-反恐怖主义融资法律法规名称** |  |
| 1. **Name of the Regulator**

**监管机构名称** |  |
| 1. **Did your company establish a conformity program that contains AML/CFT policies and procedures, according to internal & international laws, rules and standards?**

**你公司是否根据国内国际法律法规和标准建立了包含反洗钱反恐怖主义融资政策和程序的符合性程序?** | [ ]  Yes **– Please provide a copy** **如果 是，请提供一份资料**[ ]  No 否 |

|  |
| --- |
| 1. **BRIBERY POLICY 贿赂政策**
 |
| 1. **Does your Company have a bribery policy in place?**

**你公司是否有反贿赂政策？** | [ ]  Yes **– Please provide a copy** **如果 是，请提供一份资料**[ ]  No 否 |
| 1. **Has the company or the Senior Management ever been charged anywhere in the World for violation of applicable anti-bribery laws or regulations?**

**公司或公司高管是否被控违法反贿赂法或相关法规?** | [ ]  Yes **– Please provide a copy** **如果 是，请提供一份资料**[ ]  No 否 |

**SIGNATURE**

**签字**

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

自签署之日起，我/我们在此声明上述提供的信息是真实、准确的。

I/we undertake to automatically and promptly inform *[The refinery]* of any material changes.

我/我们保证在发生任何重大变化时，主动及时通知。

|  |  |  |
| --- | --- | --- |
|  | **Authorised signatory****授权签署人** | **Authorised signatory****授权签署人** |
| **Signature:****签字** |  |  |
| **Print Name:****打印姓名** |  |  |
| **Title:****职务** |  |  |
| **Company Name****公司名称** |  |  |
| **Date and Location:****日期和地点** |  |  |

**ATTACHMENT – TO BE FILLED IN ONLY FOR COMPANY SUBJECT TO AML-CFT REGULATION**

**附件：仅限受反洗钱-反资助恐怖主义法规监管的公司填写**

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| --- |
| Wolfsberg Anti-Money Laundering Questionnaire沃尔夫斯堡反洗钱调查表 |
| **Corporate Name:****公司名称** |
| **Location:****地点** |
| **If you answer “no” to any question, please ensure that an explanation and additional information is supplied at the end of the relevant section****如果对问题的回答是“否”，请确保在表格最后提供解释和备注。** |
| 1. ***General AML Policies, Practices and Procedures:***

***通用反洗钱政策，实践和程序：*** | **Yes****是** | **No****否**  |
| 1. Is the AML compliance program approved by the Corporate’s board or a senior committee?

公司董事会或高级委员会是否批准了公司的反洗钱合规性计划？ |  |  |
| 1. Does the Corporate have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML framework?

公司是否有法律法规合规性计划，计划包括指派合规专员负责协调和监督公司的反洗钱框架运作？  |  |  |
| 1. Has the Corporate developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?

公司是否有书面规定程序，以避免、察觉和报告可疑的交易？ |  |  |
| 1. In addition to inspections by the government supervisors/regulators, does the corporate client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?

除了政府监察/监管人员检查外，公司客户是否有内部审计程序或其他独立第三方定期评估反洗钱政策和实践？  |  |  |
| 1. Does the Corporate have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group).

公司是否有政策禁止与空壳银行产生账目往来/关系？（空壳银行是指在任何管辖权范围内都没有实体存在的，且不附属于任何受监管的金融集团）  |  |  |
| 1. Does the Corporate have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?

公司是否有政策来合理地确保自己公司的账户或产品不会与空壳银行发生来往？ |  |  |
| 1. Does the Corporate have policies covering relationships with politically exposed persons (PEP’s), their family and close associates?

公司是否有政策监管与政治公众人物及其家庭成员和亲信的关系？ |  |  |
| 1. Does the Corporate have record retention procedures that comply with applicable law?

公司是否有与所在国法律相符的记录保存程序？  |  |  |
| 1. Does the Corporate require that its AML policies and practices be applied to all branches and subsidiaries of the corporate both in the home country and in locations outside of the home country?

公司是否要求反洗钱政策和实践应用于国内外的所有分支机构和子公司？ |  |  |
| II. Risk Assessment 风险评估 | **Yes****是** | **No****否** |
| Does the Corporate have a risk-based assessment of its customer base and their transactions?公司是否有对其客户及其交易进行基于风险的评估措施？ |  |  |
| Does the Corporate determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the Corporate has reason to believe pose a heightened risk of illicit activities at or through the Corporate?对那些公司有理由相信会造成违法风险上升的客户和交易，公司是否会决定适度加强尽职调查？ |  |  |
| 1. ***Know Your Customer, Due Diligence and Enhanced Due Diligence***

***了解你的客户，尽职调查和加强尽职调查*** | **Yes****是** | **No****是** |
| 1. Has the Corporate implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?

公司是否采取措施来识别客户到底是代表谁来进行账户操作或进行交易的？ |  |  |
| 1. Does the Corporate have a requirement to collect information regarding its customers’ business activities?

公司是否要求收集关于客户的业务活动信息？ |  |  |
| 1. Does the Corporate assess its FI customers’ AML policies or practices?

公司是否评估其金融机构客户的反洗钱政策和实践？ |  |  |
| 1. Does the Corporate have a process to review and, where appropriate, update customer information relating to high risk client information?

公司是否有措施来复核高风险客户信息，并且如果适用，更新与高风险客户信息相关的客户信息？ |  |  |
| 1. Does the Corporate have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information?

公司是否有措施为每一个客户分别建立一个身份识别文件档案和了解你的客户信息档案？ |  |  |
| 1. Does the Corporate complete a risk-based assessment to understand the normal and expected transactions of its customers?

公司是否完成了基于风险的评估，以了解与客户的正常和预期交易？ |  |  |
| 1. ***Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds***

***值得报告的交易、预防和侦测与非法获得的资金交易*** | **Yes****是** | **No****否** |
| 1. Does the Corporate have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?

公司是否有政策或实践来鉴别和报告那些需要报告给当局的交易？  |  |  |
| 1. Where cash transaction reporting is mandatory, does the Corporate have procedures to identify transactions structured to avoid such obligations?

在那些现金交易需要强制报告的地方，公司是否有措施来识别那些避免这种报告义务的交易？ |  |  |
| 1. Does the corporate screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?

公司是否根据政府/主管当局签发的人员、企业或国家名单筛选客户和交易？ |  |  |
| 1. Does the Corporate have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?

公司是否有措施来合理的确保只与那些在其来源地持有运营许可证的代理银行进行合作?  |  |  |
| V. Transaction Monitoring 交易监控 | **Yes****是** | **No****否** |
| 1. Does the Corporate have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travellers checks, money orders, etc.

公司是否有对资金转移和旅行者支票、邮政汇票等金融票据等中的不寻常和潜在可疑交易活动的监控程序？ |  |  |
| VI. AML Training 反洗钱培训 | **Yes****是** | **No****否** |
| 1. Does the Corporate provide AML training to relevant employees that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the Corporation’s products and services and internal policies to prevent money laundering?

公司是否给相关的雇员提供反洗钱培训 ，这些培训包括鉴别和报告那些必须报告给政府当局的交易、涉及公司产品和服务不同形式的 洗钱活动的例子，以及预防洗钱的内部政策？  |  |  |
| 1. Does the Corporate retain records of its training sessions including attendance records and relevant training materials used?

公司是否会保留培训档案，包括培训人员出席记录和使用的相关培训材料？  |  |  |
| 1. Does the Corporate communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?

公司是否会向相关雇员传达新的反洗钱法律或现行反洗钱相关政策的变化？ |  |  |
| 1. Does the Corporate employ third parties to carry out some of the functions of the Corporate?

公司是否雇佣第三方来执行公司的某些职能？ |  |  |
| 1. If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes:

如果第26个问题的回答是“是”，那么金融机构是否会向相关的第三方机构提供包括下述内容的反洗钱培训？* + Identification and reporting of transactions that must be reported to government authorities;

鉴别和报告必需向政府当局报告的交易* + Examples of different forms of money laundering involving the Corporate’s products and services

涉及公司产品和服务的不同形式的洗钱例子* + Internal policies to prevent money laundering

预防洗钱的内部政策 |  |  |

Space for additional information (Please indicate which question the information is referring to):

额外信息请写在下面：（请标注出与备注内容相对应的问题）

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_