

All customers who wish to register with Via Brasil Comércio Atacadista de Produtos de Exploração Mineral Ltda. ("Via Brasil") must submit the following documents and provide the requested information. In addition, the client declares to be aware of the sanctions provided for in Brazilian legislation for false declarations and false documents, declares that the documents presented are in accordance with the original.

Documentation required for opening/renewing corporate registration		YES	NO
A	Registration Opening Form • Completed registration opening/renewal form		
B	Proof of legal existence of the Applicant Company: valid for at least 3 months before maturity • Business license (if relevant in the country of incorporation) • Mining license (for mining companies) • Certificate of Incorporation • Memorandum and Articles of Association • Register of Shareholders • Tax Registration Number/ Registration Certificate • Export/Import License		
C	Board Resolution (where applicable) • Resolution of the board of directors authorizing the opening of registration in Via Brasil		
D	Proof of the Applicant Company's physical address in the country of origin: • Original utility bill; or • Copy of the lease/purchase agreement; or • Original statement from a company, utilities, or banking institution		
E	Registration data of the applicant company: • Office phone number(s); and • Office fax number(s); and • Office email address; and • Website address		
F	Identities and addresses of all individuals controlling the Applicant Company: • Copy of passport for foreigners or Brazilian identity card; • Original public service register; or • Copy of the lease/purchase agreement		
G	Identities and addresses of all authorized signatories of the Requesting Company (if other than those indicated in D above)		
H	Identities and addresses of all persons authorized to trade on behalf of the requesting company (if different from those in F and G above)		

Documentation required for opening/renewing corporate registration		YES	NO
I	Identities and addresses (if other than those described in F, G, and H above) of: <ul style="list-style-type: none"> • Individuals holding powers of attorney from the applicant company; and • Third party mandate holders of the Applicant Company 		
J	First-class bank reference where the Applicant Company has been known to the issuing bank for at least two years.		
K	Audited financial statement for the two immediately preceding years.		
L	AML-CFT Policy and OECD Supply Chain Policy		
M	Independent Verification Report (for Mining Companies and Refineries)		

Note: We may require additional documents in the course of our review of your application.

Registration type (Please check)	Corporate	Sole proprietorship	Individual
COMPANY INFORMATION			
Name			
Business License / Business Registration No.			
Issuing Authority			
Date and Place of Incorporation			
Legal form (LLC, DMCC, LTD, S.A. etc.)			
Tax ID number			
Phone No.			
Fax no.			
Email address			
Website			
Registered Address (Provide complete information to physically locate your office. Office No. Building No. Street, City, P.O. Box, Zip Code, Country)			
Business address (Provide complete information to physically locate your office. Office No. Building No. Street, City, P.O. Box, Zip Code, Country)			
No. of direct and indirect subsidiaries			
Type of business	Gold dealer		
	Scrap metal dealer		
	Wholesaler/ Manufacturer		
	Mining Company		
	Banks/ Financial Institution		
	Jeweler		
	Trading House		
	Investment Company		
	Individual		
	Other (please specify)		

COMPANY INFORMATION

Nature of business/occupation		
Source of Funds	Business Revenue	Capital Contribution
	Debt Financing	Other (please specify)
Company size (number of employees within the company)		
Payment method	Bank transfer	%
	Cash	%

FINANCIAL INFORMATION

Total Shareholders' Equity	
Source of Wealth/Income	
Turnover of the last two years of operation	
Cost of revenue for the last two years of operation	
Expected volume and value of transactions with Via Brasil per month	
Expected volume and value of transactions with Via Brasil per year	
Name of Financial Controller	

SHAREHOLDER(S)

(If Company – provide details of the beneficial owners of a shareholder company using the beneficial ownership form.)

NAME	ADDRESS	COUNTRY OF INCORPORATION /NATIONALITY	DATE OF INCORPORATION /NOMINATION	PERCENTAGE SHARE

MANAGEMENT STRUCTURE				
NAME	POSITION/ DESIGNATION	NATIONALITY	PASSPORT (Passport number)	(Date of issue and expiration)

AUTHORIZED SIGNATORY (If you are not the owner, please provide supporting documents)	
Authorized Signatory 1 Name	Signature
Authorized Signatory 2 Name	Signature
Authorized Signatory 3 Name	Signature
Authorized Signatory 4 Name	Signature

REPRESENTATIVES AUTHORIZED TO OPERATE THE REGISTRY
(If you are not the owner, please provide supporting documents)

NAME	POSITION/ DESIGNATION	NATIONALITY	PASSPORT (Passport number)	(Date of issue and expiration)

COMPLIANCE QUESTIONNAIRE

RESPONSIBLE PRECIOUS METALS SUPPLY CHAIN POLICY	YES	NO
1. Has your company established a responsible gold supply chain policy from conflict-affected and high-risk areas that is consistent with the standards set out in the supply chain policy template in Annex II of the OECD Due Diligence Guide for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas? If so, please provide a copy.		
2. 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? If not, please provide a detailed explanation of the laws, regulations, and regulations you comply with.		
3. Your company complies with the following industry initiatives:		
LBMA Gold or Silver Responsible Guidance	RJC Chain of Custody Standard	
DMCC Responsible Sourcing Guidance	WGC Conflict Free Gold Standard	
RMI's Responsible Gold Standard	Other (please specify)	

SUPPLY CHAIN QUESTIONNAIRE

1. Does your company engage in trading, transportation, transportation, smelting, and other activities related to precious metals?	
2. If yes, please describe the company's operations.	
3. Profile of your precious metals suppliers: (i.e. Individual/ Company/Artisanal Miner, Small-Scale Miner, Gold/Precious Metals Exporter) – Please indicate approx. percentage of volume per supplier	
4. What are the countries of origin of the precious metals delivered to us?	
5. What other countries do you get precious metals from?	
6. To which country(s) or destination(s) will precious metals purchased or acquired from us be delivered?	
7. To which other countries will the precious metals you buy from other entities be delivered?	
8. Is your company required to obtain a license to mine, trade, import or export precious metals? If so, please attach a copy.	
9. Has your company established and implemented a Responsible Gold Supply Chain Policy to ensure that your supplier(s) source precious metals only from legitimate companies whose operations are ethical and compliant with OECD standards and applicable laws and regulations? If so, please attach a copy of the policy	
10. Your company has established and implemented a Responsible Gold Supply Chain Policy to ensure that no precious metals are sourced or delivered to high-risk countries without properly conducting Enhanced Due Diligence.	
11. Does your company conduct due diligence on the origin of the metals you receive from customers and inspect the authenticity and credibility of the source of precious metals disclosed by the downstream supplier?	
12. When hiring new suppliers, does your company ask about the identity of the mines, gold processing sites, processing and transportation methods, to ensure their compliance with OECD guidance?	
13. Your company ensures that the mines from which gold is extracted have:	
(i) proper legal control of the mine site, transport routes and dealers;	
(ii) Didn't you extort or tax money or minerals from the mine and transport routes?	
14. What form of payment (purchases and sales) does your company use? Please provide the percentage of each payment.	
Bank/Bank Transfer/Check Deposit	
Cash	

SUPPLY CHAIN QUESTIONNAIRE

15. What documents/information do you require from your customers to ensure they are compliant with AML/ CFT and Responsible Gold Sourcing Regulations and Guidelines.

Commercial license	Passport/Shareholder ID
Mining License	Passport/Beneficiary ID
Export/Import License	Passport / ID of the authorized manager/ representative(s)
Tax Registration	Proof of address
Financial statement	Other (specify) ID and CPF of shareholders. Environmental License. Tax, Civil and Criminal Judicial Certificates. Declarations of Conformity with respect to Origin, Good Environmental, Social and Labor Practices in accordance with Brazilian, UAE, EU and OECD laws.

16. Business references or company(ies) you have worked with (minimum of 2)

NAME	COUNTRY OF INCORPORATION

FINANCIAL ACTIVITIES/TRANSACTIONS

	YES	NO
1. Are any of your transactions extraordinarily large or frequent in relation to your known business or income activities?		
2. Do you conduct business or maintain registrations in countries or regions that are considered high-risk or have a history of financial crime or terrorism?		
3. You've ever had a bank or finance record frozen or closed due to suspicious activity or involvement in a criminal investigation? detailed explanation of the laws, regulations, and regulations you comply with.		
4. You have recently conducted business with countries categorized as high risk by the FTAF/UNSC.		
5. Have you received funds or assets from unknown or unverified sources, including hard-to-trace cryptocurrency transactions?		
6. Your company is currently being investigated by government authorities or regulatory agencies for violating laws and regulations. If yes, please explain.		

Anti-Money Laundering and Countering the Financing of Terrorism Questionnaire - Client AML and CFT Procedures

1. Has your company established and implemented written policies and procedures aimed at combating Money Laundering and Terrorist Financing and are these policies and procedures applicable to all of your branches, subsidiaries and operations? If so, please provide us with the most recent copy of your Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) policy and procedures. If not, please provide your reasons/ comments.	
2. Is all your relevant staff regularly trained on their own AML and CFT policies and procedures and on the requirements of local laws and regulations? If so, how often do your employees undergo training that covers AML and CFT?	
3. Does your company have procedures in place to identify whether your customers, customers, and beneficial owners are sanctioned entities/individuals?	
4. Does your company have procedures to identify whether your clients, clients and their beneficial owners are considered 'Politically Exposed Persons' (PEPs)?	
5. Does your establishment have procedures in place to verify that your customers, customers and other parties (as beneficial owners) are subject to targeted financial sanctions imposed by the United Nations Security Council, the European Union, the Federative Republic of Brazil and/or the United Arab Emirates or any other relevant authority in these countries and the European Union?	
6. Does your company keep records of the training provided to employees?	
7. Does your company complete and maintain records on KYC forms and documents for individuals and businesses/customers?	
8. Does your procedure require the retention of relevant records and, if so, how long are these documents retained?	
9. What are your company's policies and procedures regarding the determination of the economic beneficiary of a registration and/or transaction?	
10. Your company has adopted a "risk-based approach" in accordance with the FATF, OECD, DMCCA requirements in the evaluation of the customer, product or service, and jurisdiction or geographical risks? If YES, please elaborate the framework adopted by your company.	
11. Does your company check the names of potential customers and suppliers against a database of sanctioned persons/entities as notified by the Authorities? If yes, please indicate the name of the database used.	
12. Has your establishment joined the UIF GOAML system?	
(i) Report covered transaction (cash/wire transfer equal to or greater than USD 15,000);	
(ii) Report suspicious activity/transaction; Partial Name Matching Report/Funds Freeze Report	

Anti-Money Laundering and Countering the Financing of Terrorism Questionnaire - Client AML and CFT Procedures

13. In the event of a suspicious transaction, what are your company's policies for addressing and reporting such instances?	
14. Does your company have a policy of protecting your employees in case they report any suspicious activity in good faith?	
15. Does your company have a policy and procedures for independently auditing or testing its AML and CFT compliance?	
16. Does your company have an anti-bribery policy? If so, please provide a copy.	
17. Has your company ever been subject to regulatory penalties for failing to comply with anti-money laundering (AML) regulations?	
18. Have you ever been associated with a financial institution that faced regulatory penalties for failing to comply with anti-money laundering (AML) regulations?	
19. Has the company or its senior management ever been accused of violating any applicable anti-money laundering laws and regulations in the UAE or any other country?	
20. Has the company or its senior management ever been charged with violating any applicable anti-bribery laws or financial crime laws and regulations in the UAE or anywhere in the world?	
21. Does your company have a compliance officer and/or compliance function responsible for coordinating/monitoring compliance? If yes, please provide the name and registration details of your compliance officer at your institution.	
FULL NAME:	
DESIGNATION: COMPLIANCE	COMPLIANCE
EMAIL ADDRESS:	
TELEPHONE:	
MOBILE NO.:	

COMPLIANCE COMMITMENT

I acknowledge that, as part of Via Brasil's requirement to open registration, I must declare the source of funds that I will use for the purpose stated in this application. I understand the requirements of the laws and regulations, including all applicable Federal Laws on Anti-Money Laundering and Combating Terrorism, I warrant that metals/sources of financing are free from terrorist financing, proliferation financing, conflict financing, criminal financing, child labor, human rights violations, and/or any other criminal origin.

I certify that the above information is accurate and true, that I am duly authorized to participate in this application for registration and that the supporting documents presented herein are genuine and valid.

I authorize Via Brasil to obtain pertinent information from customers, banks and any other sources necessary for the objective evaluation of this application.

I confirm that the authorized signatory(ies) listed herein are authorized to carry out transactions for and on behalf of our company. Breach of trust by the authorized representative, or damages arising from the agent's action or such breach of trust, shall be the sole responsibility of our company.

I confirm and agree that any and all interactions related to registration between Via Brasil and our company may be registered without prior notification

I confirm that, by signing this Agreement, we have obtained the advice of an attorney and agree to the Terms and Conditions attached hereto or as published on the www.viabrasil.com.br website, which document contains the conditions for the validity and enforceability of any and all transactions entered into with Via Brasil.

SOURCE OF WEALTH STATEMENT

I confirm that the accumulated wealth of all shareholders of the Company is derived from legitimate sources such as the Company's capital/dividends they own and operate; business/investment income; professional salary; profit from investment sold; passive income from rent payments; sale of real estate; sale of the company; donation/inheritance, which are not linked to and/or derived from criminal origin, of any nature, and in particular do not constitute the proceeds of money laundering or terrorist financing. I confirm that the investments made in the Company come from the shareholders' equity and are not made on behalf of third parties. Finally, I confirm that the information provided herein is, to the best of my knowledge, accurate and complete.

I agree to provide Via Brasil with any additional information or supporting documentary evidence in relation to sources of wealth upon request.

Company Name:

Signature Name of Authorized Signer:

Signature Date:

DECLARATION OF PEP

Please check as applicable:

I/ We confirm that the shareholders/directors/ultimate beneficiary/directors of the Company:

Do not fall within the definition of 'politically exposed persons' but are natural persons who are or have been entrusted with prominent public functions, including their immediate family members, or persons known to be close associates of such persons; but must not include mid-level or more junior employees, as defined below.

They fall within the definition of 'politically exposed persons', being natural persons who are or have been entrusted with prominent public functions*, including their immediate family members** or persons known to be closely associated*** with such persons, but do not include mid-level or junior officials, as defined below.

* Prominent public functions are: Heads of State or Government, Ministers, Deputy Ministers or Deputy Ministers and Parliamentary Secretaries; Members of Parliament or similar legislative bodies; Members of governing bodies of political parties; Members of courts or other high-level judicial bodies whose decisions are not subject to appeal, except in exceptional circumstances; Members of the cadastral courts, audit committees or boards of directors of central banks, ambassadors, chargé d'affaires and other high-ranking officers of the armed forces; Members of the administration, management or boards of directors of public companies; Any person performing a function equivalent to those referred to above in an institution of the European Union or in any other international body.

**Immediate family members include: (i) the spouse or any partner recognized by national law as equivalent to the spouse;
(ii) children and their spouses or partners or persons deemed to be equivalent to a spouse; and (iii) parents.

Close associates must include: (i) A natural person known to have joint beneficial ownership of a legal entity or any other form of legal arrangement, or any other close business relationship with such politically exposed person; (ii) A natural person who has sole beneficial ownership of a legal entity or any other form of legal arrangement known to have been established for the benefit of that politically exposed person.

I declare that the above information is true and correct. In the event of changes in the circumstances of our shareholders/directors/beneficial owner/executives in relation to this statement, the Company undertakes to duly inform Via Brasil (...) of such changes, within ten (10) days after the occurrence of such change.

NB If any of the shareholders/directors/beneficial owner/directors of your company are/are classified as PEP as defined above, please provide the following details/documents:

- I. Position of the government/mixed economy company:
- II. Appointment Date:
- III. Date of Resignation (if applicable):
- IV. Source of Wealth Statement:

Company Name:

Name of Authorized Signatory:

Title / Designation:

Place and Date:

STAMP AND SIGNATURE

STATEMENT

We acknowledge that we are aware of the Fraud and Corruption, Data Protection, ESG, Risk Manual, among others and I undertake to review it thoroughly and comply with its provisions and any of its addendums and revisions that may be published from time to time and any violation may lead to the suspension of registration.

I confirm that I have read and understood the OECD Due Diligence Guidance for the Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas, the LBMA Responsible Gold Guidance and the DMCC Practice Guidance and commit to comply with their provisions.

I assume that our source(s) of precious metals are free from conflict financing, criminal financing, worst forms of child labor and human rights abuses.

We confirm that we strictly observe and comply with local and international laws, including the laws and regulations governing the illicit trade in precious metals and the United Nations Security Council (UNSC) sanctions list.

I confirm that the above information is true and correct, and that I am authorized to enter into this registration agreement and that the supporting documents provided herein are genuine and authentic.

Finally, I authorize/authorize Via Brasil to obtain pertinent information from customers, banks and any other sources necessary for the objective evaluation of this request.

Company Name:

Signature Name of Authorized Signer:

Signature Date:

STATEMENT**SOURCE OF FUNDS/METALS**

In accordance with the requirements of Federal Decree No. 20 of 2018 on Combating Money Laundering and Combating the Financing of Terrorism, the undersigned undertake that sources of funds/metals are acquired from legitimate sources not involved in the financing of conflicts or non-compliance with any United Nations sanctions, resolutions or human rights violations. Evidence of this is available if needed or as requested.

The undersigned represents and warrants to Via Brasil that the funds and/or metals to be delivered for refining or trading have been acquired by lawful means and do not originate from any country, entity or individual subject to sanctions imposed by the United Nations, the European Union, the Federative Republic of Brazil, the United Arab Emirates and/or any other relevant sanctioning authority.

Finally, we commit to ensuring that our sources of precious metals are free from conflict financing, terrorist financing, proliferation financing, criminal financing, child labor, and human rights abuses.

OECD COMMITMENT

We confirm that we have in place an adequate supply chain policy that includes continuous, proactive and reactive due diligence, risk assessment and mitigation controls to ensure that we and our suppliers are not dealing with precious metals originating from conflict-affected or high-risk areas, including the Democratic Republic of Congo and neighboring countries.

We further confirm that we are in full compliance with national and international laws, rules and regulations, including those governing the illicit trade in precious metals and the sanctions imposed by the United Nations Security Council.

Finally, we acknowledge receipt of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas – Gold Supplement, and commit to thoroughly review it and adhere to its provisions.

Company Name:	Date:
Name of Beneficial Owner/Authorized Signatory:	
Signature:	Stamp:

**Anti-Money Laundering and Countering the Financing of Terrorism
Declaration Compliance and Responsible Sourcing of Gold and Other
Precious Metals****I. Commitment to AML/CFT compliance**

We, the undersigned, declare that our operations are in compliance with all applicable anti-money laundering (AML) and countering the financing of terrorism (CFT) regulations. This commitment includes:

i. AML/CFT Policy Framework

Our company has implemented a robust AML/CFT policy framework that is regularly reviewed and updated to align with current regulations and best practices. This includes risk assessments tailored to our operating environment.

ii. Due Diligence Procedures

We conduct thorough due diligence on all financial transactions and interactions related to our operations. This process involves identifying and verifying the identity of all parties involved, as well as understanding the nature and purpose of the transactions. This includes:

- a. Party identification and verification: We identify and verify the identities of all entities and individuals involved in transactions, including identifying ultimate beneficial owners (UBOs) to avoid hidden ownership risks.
- b. PEP Identification: We have implemented enhanced screening processes to identify Politically Exposed Persons (PEPs) and apply greater scrutiny to transactions involving PEPs to mitigate the risks of corruption or undue influence.
- c. EDD for high-risk transactions: We apply Enhanced Due Diligence (EDD) for high-risk parties or jurisdictions, ensuring that additional verification steps are taken, including a closer examination of the source of funds and ongoing monitoring of business relationships.

iii. Anti-Bribery and Corruption

We have enforced strict anti-corruption policies and procedures to ensure that our business remains free from bribery, corruption, and unethical practices, implementing robust internal controls and whistleblowing mechanisms to detect and prevent corruption.

iv. Risk identification

We will continuously assess the money laundering and terrorist financing risks associated with customers, transactions, products/services, delivery channel and geographic locations. This assessment will guide the level of due diligence and monitoring required, ensuring that high-risk activities are subject to increased scrutiny.

v. Continuous monitoring

We are committed to continuously monitoring customer transactions to identify unusual or suspicious activity. The enhanced monitoring will be applied to customers and transactions classified as higher risk. Any significant changes in customer behavior, transaction patterns, or risk profiles will trigger a review of the customer's risk rating.

Anti-Money Laundering and Countering the Financing of Terrorism Declaration Compliance and Responsible Sourcing of Gold and Other Precious Metals

vi. Risk-based controls and mitigation

Based on the risk assessment, we will implement appropriate risk mitigation measures, such as:

- a. Increased due diligence checks and verification steps.
- b. Transaction limits or restrictions on certain high-risk products or services.
- c. Regular reviews of customer risk profiles and business relationships.

vii. Compliance with regulatory requirements

Our Risk-Based Approach complies with international standards, including the Financial Action Task Force (FATF) Recommendations, as well as applicable local laws and regulations.

viii. Obligations to immediately report any suspicious activities or transactions to the appropriate authorities, in accordance with legal requirements.

II. Responsible sourcing of gold and other precious metals

As a responsible trader of unmanufactured precious metals, we are committed to ensuring that our gold and other precious metals are sourced ethically and sustainably. In this regard, we declare the following:

a. Conflict-free minerals

We ensure that the gold we acquire is not associated with the financing of conflict, forced labor, child labor, or other human rights abuses. We engage with buyers and stakeholders to promote conflict-free sourcing and will disengage from buyers or sources that do not meet these ethical standards.

b. Compliance with OECD Guidelines

We adhere to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the UN Guiding Principles on Business and Human Rights, and other relevant frameworks, ensuring that our operations are free from negative impacts.

III. Transport Routes and Chain of Custody

We recognize the importance of maintaining a safe and transparent transportation process for the gold produced. Our commitments include:

i. Documented transport routes

We have established clear and documented transportation routes for the movement of gold from our mining site to the designated delivery site. These routes are regularly assessed for safety risks and compliance with regulations.

ii. Safe transport procedures

Gold is transported using secure methods, including appropriate vehicles and trained personnel, to minimize the risks of theft or tampering during transportation. All transportation operations are carried out in compliance with relevant laws and regulations.

iii. Chain of Custody Protocols

We maintain a detailed chain of custody for all gold during transport, including documentation, real-time tracking, and protocols to verify shipment integrity.

Anti-Money Laundering and Countering the Financing of Terrorism Declaration Compliance and Responsible Sourcing of Gold and Other Precious Metals

IV. Recognition of responsibilities

We recognize our responsibility to maintain the highest standards of integrity in our operations and to ensure that our activities do not contribute to money laundering, terrorist financing, or human rights abuses. Our management team is dedicated to fostering a culture of compliance and ethical behavior within our organization.

V. Certification

By signing below, we certify that the information provided in this statement is accurate and complete, to the best of our knowledge. We understand that any misrepresentations may result in legal consequences, reputational damage, and the termination of our business relationship with Via Brasil. We also undertake to cooperate fully with any audits or investigations conducted by Via Brasil to verify our compliance with the statements made herein.

Company Name:	Date:
Name of Beneficial Owner/Authorized Signatory:	
Signature:	Stamp: