



# REPUBLIC METALS CORPORATION™

Refiners of Precious Metals

Gold • Silver • Platinum • Palladium

## COMPLIANCE RISK MANAGEMENT POLICY

RMC's identified compliance risks include but are not limited to the following: counter party/customer, money laundering, reputation, material supply chain, human rights, bribery and corruption.

RMC has established a rigorous Compliance Program, which addresses identified compliance related risks through the development of a risk mitigation plan that include policies and procedures in Customer Identification, Anti-Money Laundering, Anti- Bribery and Corruption, Conflict Free Supply Chain Policy, Supporting the United Nations Universal Declaration of Human Rights, Employee Ethics and Whistleblower policy.

Our KYC-AML procedures include investigating all entities and their beneficial owners with whom we buy or sell materials. All business counterparties are verified using World Check, World Compliance, Lexis Nexis Bridger (Bridger Insight), Thomson Reuters CLEAR, whose data bases includes OFAC, PEP, CFT, government agencies, real time incarcerations, arrests, News and 40+ sanctions list. Additionally, we use Google Search and Nomino-Data for negative news. RMC utilizes third party compliance consultants, attorneys in country of origin, and private investigators when RMC is need of further due diligence. We obtain corporate documentation, licenses and beneficial ownership information, including government issued photo identification. Information obtained from applications and questionnaires are verified for accuracy. RMC utilizes a risk matrix to rate each counter-party. The matrix takes into its formula such factors as documentation, identification, business type, background check, length of time in business, reputation, country risk, customer's own Supply Chain and AML program, and on site visitation reports. Resulting ratings have tiered levels of risk accompanied by tiered levels of management approval. All accounts are presented to the RMC Client Onboarding Committee, consisting of five Senior Managers and the CEO for ultimate review and approval.

Our accounts are continuously reviewed and updated annually. Internally employees working in areas susceptible to money laundering receive proper training to detect "red flags" for any suspicious activity. RMC has a strict code of ethics, and offers employees the opportunity to anonymously report violations of any of its policies and procedures through use of a third party vendor hot-line.

Richard A. Lani, CAMS  
Compliance Director

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COMEX  
GOOD DELIVERY



HQ Republic Metals Corporation | 12900 NW 38th Ave, Miami, FL 33054  
T 888-685-8505 | E info@republicmetalscorp.com | W republicmetalscorp.com