



JUST REFINERS USA, INC.
620 Greg Street, Sparks, NV. 89431 USA

Anti-Money Laundering Program (AML) and Bank Secrecy Act (BSA)

Just Refiners (USA) Inc. has designed an anti-money laundering program that complies with the Financial Crimes Enforcement Agency (Fin CEN). As part of Just Refiners due diligence, it strictly adheres to the policies and procedures of the Bank Secrecy Act (BSA). Just Refiners has also implemented procedures and safe guards to ensure against being implicated in illegal activity regardless of whether this activity occurs in a foreign country or in the United States. It is the commitment of Just Refiners (USA) Inc. to do what is necessary to avoid aiding and abetting the violation of domestic or foreign laws.

A. Customers

Just Refiners (USA) Inc. requires all customers to complete a customer information packet. The packet requests contact information, passport numbers and copies of passports, bank references, as well as certificates of good standing certified by the state or country where they are operating. Registration certificates are required for all international customers. In some instances, Just Refiners (USA) Inc. will require a government issued export license. All sources of income are requested as well. This ensures Just Refiners (USA) Inc. that there is a positive identification of the people and companies with whom we do business. In addition, IRS 8300 forms are completed for those customers who have made cash transactions with Just Refiners (USA) Inc. in excess of \$10,000. Customers with transactions in excess of \$10,000 involving payment with money orders, traveler's checks, cashiers' checks or bank checks each with a face amount less than \$10,000 are required to have 8300 forms filled out as well. Regardless of the dollar amount or type of currency, any transaction thought to be suspicious requires the completion of an 8300 form.

Before agreeing to do business with a company, Just Refiners (USA) Inc. is required to ask the following questions to the potential customer:

- (1) What type of business is customer engaged in?
- (2) What type of products does the customer wish to buy/ have refined?
- (3) Were metals obtained legally in, and or exported legally from a foreign country/ or U.S. by the customer?
- (4) Who are the suppliers to the customer? Who are your customer's customer?
- (5) What are the geographic locations in which customer acquired material?
- (6) Who is the customer?
- (7) What is the last country of export of the material being discussed?

If Just Refiners (USA) Inc. sales representatives or compliance officer feels that any of the answers to the above questions are vague or suspicious, business negotiations are suspended and government authorities are notified of the situation.

Financial Institutions Hotline – (1-866) 566-3974
Office of Chief Counsel (Fin CEN) – (703) 905-3590
Office of the General Counsel – (202) 622-1927
Office of the Assistant General Counsel – (202) 622-0480
www.fincen.gov



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B. Indicators of Illegal Activity

Just Refiners (USA) Inc. has identified a list of several, “red flags” or situations that necessitate customer investigation and possible contact of government regulators. These “red flags” are known by all sales representatives and are as follows:

- (1) Unusual payments such as the use of large amounts of cash
- (2) Multiple or sequentially numbered money orders, traveler’s checks, cashier’s checks
- (3) Payments to/from unknown third parties
- (4) The frequent change or use of multiple corporation names or account names
- (5) The frequent change or use of multiple banking institutions
- (6) Attempts by customer to maintain a high and unusual degree of secrecy with respect to the transaction
- (7) Request for no business records to be kept
- (8) Purchases that are unusual for that particular customer
- (9) Purchases that do not conform to standard industry practice
- (10) Structured, complex, or multiple invoice requests

If any of the indicators are present, investigation of the matter is initiated immediately and government authorities will be contacted if necessary.

C. Compliance Officer

Hendrik (Bobby) Boekhoud has been appointed Compliance Officer on behalf of Just Refiners (USA) Inc. He is in charge of administering the anti-money laundering program. He has read the USA Patriot Act in its entirety and is competent and knowledgeable regarding BSA requirements and money laundering issues. He is responsible for ensuring that the program is being implemented effectively and the program is updated as necessary. He is required to train the personnel responsible for day-to-day customer relations, so they are aware of the indicators of fraudulent attempts when they present themselves. He will conduct periodic testing of the compliance program to ensure its success and proper implementation.

Existing customers are periodically reevaluated to ensure efficiency in the program.