

Bullion Trading



Code of Conduct



Self-Assessment Guide



**Swarna Adarsh
Abhiyaan**

An industry initiative

Inspired by the Retail Gold Investment Principles

Supported by



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Welcome to the in-depth guide for Bullion Trading.



The first part - the Code of Conduct, will help you understand and adapt to the best practices laid out as per the Retail Gold Investment Principles.



The second part - the Self-assessment Guide will help you identify areas of improvement through a comprehensive questionnaire.

We hope that with this guide by your side, you can embark on a glorious journey and set a new benchmark in the gold industry.



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Introduction and structure of the Code of Conduct document

This Code of Conduct document is aimed at providing high-level guidance for Bullion Trading. The Code of Conduct includes sound practices, additional best practices and implementation guidance for Bullion Trading.

Sound practices capture healthy practices which should be followed by any provider (across all sizes, complexity, etc.)

Additional best practices are aimed at larger/matured providers who wish to adhere to even higher standards of practice

Implementation guidance offers broad steps to deploy sound practices/additional best practices in an organisation. The guidance is directional in nature and is not exhaustive. Practical application of these practices will require a detailed guidance that is specific to the organization

Scope and Objectives



World Gold Council launched Global Retail Gold Investment Principles (RGIPs) in August 2020. The principles are designed to raise the bar for product providers across the market and encourage retail investors to place their trust in gold. Greater trust should benefit customers and product providers alike, creating value and driving demand across the industry.

Global Retail Gold Investment Principles



Fairness
and integrity



Transparency



Protection of
client assets



Responsible
gold sourcing



Regulatory
compliance



Commercial
prudence



Operational
professionalism

Gold is an important asset class in India with an annual demand of ~800–900 tonnes¹, making India the world's second largest consumer of gold. Gold holds a unique place in India, being culturally and socially **significant**², and is an important **savings asset**³ with its consumption driven largely in the form of **jewellery**⁴, investment bars and coins.

While Indians have a strong affinity for investment in gold, individuals seeking to invest in gold face several challenges in doing so, particularly around price transparency and quality assurance. As the market is fragmented and there is no overarching supervisory body, an industry-defined Code of Conduct is deemed to be an effective mechanism for protecting the interest of retail investors.

Effective dissemination and implementation of the Code of Conduct should enhance trust of consumers in gold products. This should, in turn, drive demand for both established and new gold products, benefitting consumers and the industry. This document is a step in that direction, and it lays out the Code of Conduct specific to Bullion Trading. There are similar existing Code of Conduct documents for other activities across gold value chain including refining, manufacturing, assaying and retailing. We may develop further Code of Conduct for activities such as vaulting, lending, etc. in future, as required.

¹ Source: Viability of a Gold Exchange in India, 2016 by India Gold Policy Centre

² ~87% of estimated gold stock in India is with women

³ ~20% of household wealth stored is in the form of gold

⁴ ~80% of gold demand in India is in the form of jewellery compared to ~35% globally

Gold industry value chain



The process of developing the Code of Conduct has included interaction with a number of industry experts, providers and other stakeholders. We envision that the Code of Conduct guidelines will continue to evolve over time in step with global best practices and changing consumer preferences and improved awareness of consumers in India.

India Gold Market

Code of Conduct - Bullion Trading



Activity	Sound Practices
Sourcing	<ol style="list-style-type: none"> 1. I promise to buy high integrity gold from trustworthy suppliers, who adhere to responsible gold standards, after conducting adequate due diligence on them 2. I promise to conduct business transparently by ensuring due documentation for all transactions with suppliers
Trading	<ol style="list-style-type: none"> 3. I promise to offer fair and clear information on key product characteristics to my customers 4. I promise to maintain fairness and transparency for the prices and fees charged to the customers 5. I promise to clearly communicate terms and conditions including customer rights related to gold ownership 6. I promise to appropriately hedge the risks incurred through trading or holding physical inventory or currency 7. I promise to maintain transaction receipts/business contracts which contain relevant information about product, price and transaction 8. I promise to take appropriate measures to minimise liquidity, pricing, settlement and transaction related risks for my business and customers (Additional best practices)
Transportation, storage and withdrawals	<ol style="list-style-type: none"> 9. I promise to have adequate operational processes for safe handling of gold assets and insurance to cover them against any event of loss 10. I promise to disclose the terms and conditions and protect customer rights with regards to withdrawing or taking delivery of their gold holdings
Customer and complaints management	<ol style="list-style-type: none"> 11. I promise to adhere to minimum KYC requirements before initiating business with a new customer and update this information periodically 12. I promise to offer educational material on products, pricing and trading practices to the customers or point them to credible sources of such information 13. I promise to implement adequate systems and mechanisms to receive, record and redress customer queries and complaints
Payments	<ol style="list-style-type: none"> 14. I promise to clearly communicate and adhere to terms, conditions and timelines of payment with every customer and supplier, consistently and impartially
Risk management	<ol style="list-style-type: none"> 15. I promise to proactively identify major financial and non-financial risks to the business and take appropriate steps to mitigate / manage the risks 16. I promise to have a dedicated and trained risk management team without linkage to any business incentives (Additional best practices)
Audit and compliance	<ol style="list-style-type: none"> 17. I promise to comply with all applicable laws and regulations, maintain adequate documentation and disclose required information to regulatory/statutory bodies

Linkage to Retail Gold Investment Principles



Sound practices and Additional best practices for Bullion Trading cover all the seven Global Retail Gold Investment Principles and are mapped predominantly as below.

No.	Sound practices/Additional best practices	Fairness and integrity	Transparency	Protection of client assets	Responsible gold sourcing	Regulatory compliance	Commercial prudence	Operational professionalism
1.	I promise to buy high integrity gold from trustworthy suppliers, who adhere to responsible gold standards, after conducting adequate due diligence on them				✓	✓		
2.	I promise to conduct business transparently by ensuring due documentation for all transactions with suppliers		✓			✓		
3.	I promise to offer fair and clear information to customers on key product characteristics to my customers	✓	✓					
4.	I promise to maintain fairness and transparency for the prices and fees charged to the customers	✓	✓					
5.	I promise to clearly communicate terms and conditions including customer rights related to gold ownership	✓	✓					
6.	I promise to appropriately hedge the risks incurred through trading or holding physical inventory or currency			✓			✓	✓
7.	I promise to maintain transaction receipts/business contracts which contain relevant information about product, price and transaction	✓				✓		
8.	I promise to take appropriate measures to minimise liquidity, pricing, settlement and transaction related risks for my business and customers (Additional best practices)			✓			✓	✓
9.	I promise to have adequate operational processes for safe handling of gold assets and insurance to cover them against any event of loss			✓				✓
10.	I promise to disclose the terms and conditions and protect customer rights with regards to withdrawing or taking delivery of their gold holdings	✓	✓					
11.	I promise to adhere to minimum KYC requirements before initiating business with a new customer and update this information periodically	✓				✓		
12.	I promise to offer educational material on products, pricing and trading practices to the customers or point them to credible sources of such information	✓						
13.	I promise to implement adequate systems and mechanisms to receive, record and redress customer queries and complaints	✓						
14.	I promise to clearly communicate and adhere to terms, conditions and timelines of payment with every customer and supplier, consistently and impartially	✓	✓					
15.	I promise to proactively identify major financial and non-financial risks to the business and take appropriate steps to mitigate / manage the risks					✓		
16.	I promise to have a dedicated and trained risk management team without linkage to any business incentive (Additional best practices)					✓		✓
17.	I promise to comply with all applicable laws and regulations, maintain adequate documentation and disclose required information to regulatory/statutory bodiest					✓		

Implementation guidance



Sourcing

1

I promise to buy high integrity gold from trustworthy suppliers, who adhere to responsible gold standards, after conducting adequate due diligence on them

- As applicable, source from suppliers who by themselves adhere to responsible gold sourcing standards, e.g. LBMA, India good delivery standards
- Leverage accepted chains of integrity, e.g. BIS/NABL, LBMA accredited refineries, bullion banks importing as per government norms, reputable exchanges, LBMA reputed dealers
- Conduct due diligence and record relevant information about suppliers such as below before initiating any business transaction with a new supplier
 - Business licence
 - GST certificate
 - PAN details
 - Information on supplier's practices from market intelligence and referee, if any
 - Product inspection
- Monitor practices and update information recorded for onboarded suppliers annually or intermittently (e.g. any red flag is raised for the supplier from market intelligence or any reliable source)
- Report any unfair practices based on the collected information to relevant authorities

2

I promise to conduct business transparently by ensuring due documentation for all transactions with suppliers

- Ensure documentation of relevant details such as below with suppliers for each trade
 - Weight of gold
 - Quality of gold
 - Source of gold (e.g. refinery mark)
 - Standards followed by the supplier, if any, such as LBMA, India Good delivery standards
 - Legal bill/invoice
 - Contract, if applicable
 - Serial number
- Ensure the integrity of product by appropriate packaging, certificates of authenticity or inspection
- Details of procured gold to be collected irrespective of the volume of gold traded and nature of relationship with the supplier

Trading

3 I promise to offer fair and clear information to customers on key product characteristics to my customers

- Offer fair and clear information on key product characteristics such as below to customers
 - Weight, purity
 - Standards followed by the supplier (LBMA, India good delivery)
 - Mint or refinery from which product has been sourced
 - Allocated or unallocated gold
 - Serial no. of the bar
 - Disclose key applicable regulatory guidelines and requirements related to the offering and provide update to customer in case of any changes
 - Key risks should not be omitted, disguised or misstated
-

4 I promise to maintain fairness and transparency for the prices and fees charged to the customers

- Charge fair prices and fees (reference price such as MCX, customs duty, storage and handling charges, transaction fees, taxes, etc.) in line with local market practices
 - Clearly disclose this information to customer allowing them to calculate the overall premium they are paying on basis price for gold before they make investment / purchase decisions
 - Disclose the price and time of executed trades
 - Do treat customers consistently, e.g. display price on the website
 - If possible, explicitly disclose actual mark-ups/spreads to investors
-

5 I promise to clearly communicate terms and conditions including customer rights related to gold ownership

- Key terms and conditions must be made available to prospects and customers
 - Disclosed terms should, at a minimum, include information on customer rights; reference to applicable fees and other costs; trading practices, and storage and insurance arrangements
 - Make it clear when legal title passes to the customer during the transaction process
 - Provide customers with transparency on settlement times and terms, such as whether positions can be closed before final settlement or what happens in case of a transaction failure or a cancellation
-

6 I promise to appropriately hedge the risks incurred through trading or holding physical inventory or currency

- Limit or hedge gold stock positions required to meet customer orders, so that price changes do not create significant losses for customers
 - Pursue trading in OTC market/exchanges after careful assessment of risks and benefits
 - Hedge any significant market price risks incurred through trading and holding physical inventory or currency
 - Segregate customer gold holdings from any proprietary trading stock or company assets
 - Follow recognised gold trading practices based on regulatory requirements
 - Implement and monitor trading and hedging procedures
-

7

I promise to maintain transaction receipts/business contracts which contain relevant information about product, price and transaction

- Maintain transaction receipts for all transactions
- Maintain records of transactions for a minimum period of 2 years
- Include all the relevant information on the invoice with respect to price (reference price such as MCX, customs duty, storage and handling charges, transaction fees, taxes, etc.), product (purity, weight, delivery standards, serial no.) and transaction (date and time, etc.)

Additional best practices

8

I promise to take appropriate measures to minimise liquidity, pricing, settlement pricing, settlement and transaction related risks for my business and customers

- Ensure the immediate settlement of gold trades by trading (hedged) inventory or consignment stock and asking customers to pay upfront
- Maximise liquidity and optimise prices for investors e.g. by trading with large and multiple suppliers, allowing customers to trade with one another (if allowed)
- Do not assume undue market risk that could adversely affect creditworthiness by pursuing proprietary trading in gold, other precious metals, currencies or other financial instruments
- Define internal risk limits with regards to market risks such as trading positions in gold, currencies or derivatives, which could threaten the company's liquidity
- Minimise settlement risks by ensuring that operating models have been appropriately configured and reviewed
- Do not enter into any lending transactions involving customers' gold holdings

Sample Scenario:

I am a bullion trader and I serve small to mid-size retailers and manufacturers. Recently, I onboarded two large retailers as my customers. My older customers perceive that I offer discount to large retailers as they offer more business and are well versed with market dynamics. However, this is not true. I treat all my customer fairly and equally. How can I address this situation as it poses significant risk to my business?

Potential Response^v:

You need to invoke trust in your customers that your practices are standard and don't vary with customers. Some of the following steps can help in doing so -

- Clearly display and communicate the reference price used
- Clearly communicate additional charges such as storage, handling, transaction, taxes etc. to customers. If the additional charges are standard, you can consider displaying the same
- Share product information on a standard template capturing characteristics such as weight, purity etc.
- Clearly display and communicate customer rights including provision for complaints and grievance redressal

Transportation, storage and withdrawals

9

I promise to have adequate operational processes for safe handling of gold assets and insurance to cover them against any event of loss

- Deploy adequate physical security/ technology enabled access to vaults, strong rooms; physical/digital recordkeeping of access to ensure safety of stored assets
- Outsource logistics to professional custodians/vaulting service providers, preferably those that are members of reputable trade bodies like LBMA or exchanges and other regulated infrastructure providers
- Conduct due diligence (e.g. presence of adequate operational controls, security system, etc.) and collect relevant KYC details for these providers

- Ensure that gold assets stored or in transit have adequate insurance cover against any event of loss including loss, damage or theft
- Ensure that the product is only delivered to authorised person only by checking government ID verification

10

I promise to disclose the terms and conditions and protect customer rights with regards to withdrawing or taking delivery of their gold holdings

- Provide information on delivery time, charges, requirements related to minimum lot sizes, names and necessary information of logistics service providers, etc. to the customers
- Disclose terms including information on customer rights, insurance arrangements, etc.

Customer and complaints management

11

I promise to adhere to minimum KYC requirements before initiating business with a new customer and update this information periodically

- Perform due diligence and capture relevant information such as below before initiating any business transaction with a new customer
 - Articles of association, memorandum of association, details of directors, bank account, PAN details, designated delivery person (in case of a company)
 - Business licence/registration, GST certificate, PAN details, bank account (in case of a proprietor)
 - Financial stability of the customer
 - Post-dated cheque, Bank guarantee (in case of credit to customers)

- Authorisation letter for delivery
- Information from market intelligence (e.g. any history of payment defaults)

- Update the information recorded for onboarded customers annually or intermittently (e.g. required to update information every 11 months according to OECD guidelines)
- Report suspicious activities to the authorities. Prohibited customers must be rejected and high-risk ones must be subjected to enhanced due diligence

12 I promise to offer educational material on products, pricing and trading practices to the customers or point them to credible sources of such information

- Make customers aware about the standards followed by the company (BIS, LBMA, etc.) and whether the products are sourced responsibly
 - Encourage customers to check the product specifications (e.g. refinery mark, weight, serial no.), test purity and price breakup on receipt
 - Proactively educate customers such as retailers to buy high integrity gold and sell hallmarked jewellery to their customers
 - Guide customers to credible sources of information (e.g. BIS website, LBMA standards, World Gold Council) to help them know more about best practices in the gold industry and make informed decisions
-

13 I promise to implement adequate systems and mechanisms to receive, record and redress customer queries and complaints

- Educate my customers on their rights to raise complaints and the process to access customer support
 - Trader should communicate their responsibility for specific issues, e.g. related to product quality, transaction failures, timely delivery, etc.
 - Provide adequate training to support staff and ensure their availability during standard office hours by email and phone at a minimum
 - Set-up a physical/digital system for customers to file complaints or raise queries. The system should also allow to record, track and resolve queries within the agreed upon timelines
-

Sample Scenario:

I am a gold bullion trader. One of my customers has come to me with a complaint regarding the purity of bar that they bought from me. They have tested the bar and found it to be of lesser purity than stated. How should I resolve this complaint?

Potential Response:

It is important to ensure that you have clearly communicated customer rights and your responsibility in such situations. Similarly, you should also have clear understanding of the responsibility of your supplier whether they are liable to compensate in such cases or the onus is on you

- Verify the purity of the bar yourself or ask for testing proof from the customer
- Revisit the terms and conditions to check the validity of customer complaint e.g. whether the customer has supported the complaint with proper invoice
- Reach out to your upstream partner i.e. refiner, bank to report discrepancy and demand compensation if they are liable as per terms of trade
- Accordingly, resolve the customer complaint (e.g. paying/adjusting for the difference) within agreed upon timelines

Payments

14 I promise to clearly communicate and adhere to terms, conditions and timelines of payment with every customer and supplier, consistently and impartially

- Disclose/Solicit key terms and conditions with customers and suppliers such as
 - Applicable purchase price and charges including any additional operational charges (transaction, delivery, storage, etc.)
 - Trade settlement and insurance arrangements
 - Information on customer rights
 - Timelines for the trade
 - Available payment methods to the customer, e.g. digital payments, credit card or cash
 - Quality and quantum of products and services to be provided
 - Adhere to terms, conditions and timelines as agreed upon with the suppliers and customers
 - Any changes to terms and conditions of trade should be communicated to the customers and suppliers explicitly in writing (especially in case of repeat business)
-

Sample Scenario:

I am a large gold bullion trader and have been in this business for more than 20 years. A new customer has approached me and asked for payment terms that involve credit. He has been referred by some other customers of mine that I do extend credit. How should I respond?

Potential Response:

It's important to be transparent in these situations and adhere to standard processes to prevent unnecessary risk to business -

- Define a standard criterion based on customer's financial stability, duration of trade, trade history, etc. for offering credit
- Negotiate terms and conditions after conducting adequate due diligence on the customer with specific focus on financial stability and history of payment defaults (if any)
- Depending on the assessment, communicate whether you would be able to extend credit and the corresponding payment terms
- Include provision for payment through post-dated cheque, bank guarantee, etc., to protect against counterparty risk
- If the customer does not fulfil criteria as defined by you, also clarify if the payment terms could be updated in future

Risk management

15

I promise to proactively identify major financial and non-financial risks to the business and take appropriate steps to mitigate / manage the risks

- Proactively identify and measure major risks for the business such as
 - Operational risks (risks due to error or fraud)
 - Financial risks (gold price risk including customs duty variation and currency movement risks, settlement risk, counterparty risk)
 - Legal and compliance risk
 - Third party/Outsourcing risk
 - Cyber risk
- Deploy risk management practices including processes, policies, roles and responsibilities to mitigate / manage identified risks, e.g.
 - Maintain adequate financial resources to service all liabilities as they fall due or cover any other risks that the business chooses to incur
 - Minimum/no credit window for customers to reduce the counterparty risk
 - Minimum/no business with suppliers/ customers/logistics providers with negative sentiments (limited financial stability, involvement in unfair trade practices, etc.)
 - Focusing on correct procedures in areas such as contractual terms or insurance requirements
 - Develop policies to protect customer rights. For example, in case of wind-down, special consideration should be given to returning any gold or cash held for customers
 - Assign responsibilities around issues such as planning or approval of a wind-down plan

Additional best practices

16

I promise to have a dedicated and trained risk management team without linkage to any business incentives

- Deploy a dedicated risk management team without any business incentive which can perform regular risk assessment, maintain a risk register, design and implement risk mitigation plans
- Implement the “separation of duties principles”, where two independent people are required to complete certain critical activities. Helps to prevent or mitigate fraud and operational errors
- Deploy adequate safeguards to protect the KYC information collected from suppliers, customers, logistics agencies, etc. Implement cyber-security best practices and be prepared for IT emergencies, including system failures

Audit and compliance

17

I promise to comply with all applicable laws and regulations, maintain adequate documentation and disclose required information to regulatory/statutory bodies

- Comply with all applicable laws and regulations in the markets in which they operate (including those where customers and potential customers are located)
 - Establish and maintain accurate records such as customer/supplier names, accounts, transactions and appropriate recordkeeping controls
 - Document any compliance procedures for internal purposes, as well as for any legitimate requests by external parties such as regulators or business partners, such as banks
 - Conduct regular internal audits. Audit should include verification of gold holdings and reconciliation with retailer's records and information system
 - Disclose any information related to taxation, consumer protection as required by regulatory authorities
-

Dissemination and application of the Code of Conduct

The proposed sound practices, additional best practices and implementation guidance are voluntary, so, there will be no audit or public endorsement. However, we believe that conforming with these practices will strongly benefit providers and customers. Over time, we expect stakeholders to push for implementation of the sound practices outlined in this document.

Providers are therefore encouraged to independently demonstrate compliance with the sound practices. This should strengthen trust in their offerings, facilitate customer acquisition, drive business growth and foster co-operation with external partners such as vault operators, security carriers, gold dealers and banks. Providers can demonstrate adherence to the practices through public disclosure to customers, investors and other interested parties. This can be achieved in several ways – via providers' own websites, through marketing materials or more generally online.

Providers who choose to go beyond to additional best practices will be able to differentiate themselves from peers.

Disclaimer

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Annexure A: Self-assessment Guide



Introduction to Self-assessment Guide

The Self-assessment Guide is applicable for organisations of any size as the test is based on the practices deployed and not the volume of trade conducted. It is voluntary at present and there will be no audit or public endorsement. Providers can demonstrate adherence to the practices through public disclosure to customers, investors and other interested parties. This can be achieved in several ways – via providers' own websites, through marketing materials or more generally online.

Self-assessment Guide aims to help the provider with current state assessment of their practices against corresponding Code of Conduct and entails three steps for assessment –

- 1.** Read the corresponding Code of Conduct thoroughly before beginning this assessment
- 2.** Refer to guiding questions to develop conclusion for the organisation's practices against each Code of Conduct statement – to determine the extent to which a Code of Conduct is observed by the organisation
- 3.** Assess current state against each Code of Conduct. The assessment is built on the gravity and urgency to address the areas of improvement

Assessment outcome would be as following –

A. Observed (O)

The provider observes the Code of Conduct in entirety

B. Broadly Observed (BO)

The provider broadly observes the Code of Conduct. The assessment has identified one or more areas of improvement that the provider should address and follow up within a defined timeline

C. Partly Observed (PO)

The provider partly observes the Code of Conduct. The assessment has identified one or more critical areas of improvement and should be addressed as high-priority items

D. Not Observed (NO)

The provider does not observe the Code of Conduct.

The Self-assessment Guide is evolving in nature and will mature over time with inputs from the market participants.

Detailed assessment guidance

1

I promise to buy high integrity gold from trustworthy suppliers, who adhere to responsible gold standards, after conducting adequate due diligence on them

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you have a criterion to only procure gold which adheres to Indian industry-accepted standards only?
2. Do you conduct due diligence / have adequate processes to evaluate suppliers before initiating business with them?
3. Do you monitor and update the information on suppliers periodically?

Assessment notes:

Area(s) of improvement:

2

I promise to conduct business transparently by ensuring due documentation for all transactions with suppliers

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you document all information related to the trade in purchase orders / other documents?
2. Do you ensure that the documentation is completed for all trades, irrespective of volume and nature of relationship the supplier?
3. Do you maintain records of past transactions for reasonable period?

Assessment notes:

Area(s) of improvement:

3

I promise to offer fair and clear information on key product characteristics to my customers

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you disclose conditions for the transaction and have documents to share the information with customers?
2. Do you disclose applicable regulatory guidelines applicable to product to your customer?
3. Do you state potential investment risks objectively?

Assessment notes:

Area(s) of improvement:

4

I promise to maintain fairness and transparency for the prices and fees charged to the customers

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you charge standard prices and fees to the customers irrespective of their understanding of the industry?
2. Do you disclose pricing components to the customer (e.g. base price of gold, mark up and logistics charges)?

Assessment notes:

Area(s) of improvement:

5

I promise to clearly communicate terms and conditions including customer rights related to gold ownership

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you clearly disclose key terms and conditions to prospects and customers? Does this include information such as customer rights, settlement time, insurance arrangements?
2. Do you make the customer aware of their rights and at what stage legal ownership of the bullion changes during the transaction?

Assessment notes:

Area(s) of improvement:

6

I promise to appropriately hedge the risks incurred through trading or holding physical inventory or currency

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you assess the risks involved in trading/holding physical inventory/currency?
2. Do you hedge the transaction risks involved?
3. In case you take advance payment, do you ensure that customer is protected from significant losses?

Assessment notes:

Area(s) of improvement:

7

I promise to maintain transaction receipts/business contracts which contain relevant information about product, price and transaction

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you maintain receipts/business contracts for all transactions?
Do you include all the requisite details about product, price and transaction?
2. Do you store the above records for reasonable period
(at least 2 years)?

Assessment notes:

Area(s) of improvement:

8

I promise to take appropriate measures to minimise liquidity, pricing, settlement and transaction related risks for my business and customers

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you ensure immediate settlement of gold trades by hedging or consigning purchase for customers paying upfront?
2. Do you define internal risk limits and mitigate undue market risk that could affect your credit worthiness?
3. Do you enter into any lending transactions involving customers' gold holdings that could create risks that the customers may be unaware of?

Assessment notes:

Area(s) of improvement:

9

I promise to have adequate operational processes for safe handling of gold assets and insurance to cover them against any event of loss

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you deploy adequate safety measures to store and transport gold, cash and precious metals? Do you consider professional custodians/ vaulting service providers (e.g. those that are members of reputable trade bodies like LBMA or serve exchanges)?
2. Do you have adequate insurance or capital buffers to cover against any event of loss?
3. Do you conduct due diligence / "Know Your Provider" checks to evaluate logistics agencies before empanelling them?

Assessment notes:

Area(s) of improvement:

10

I promise to disclose the terms and conditions and protect customer rights with regards to withdrawing or taking delivery of their gold holdings

Current state:

- ☐ Observed
- ☐ Broadly observed
- ☐ Partly observed
- ☐ Not observed

Key questions to consider:

1. Do you disclose the terms and conditions with regards to withdrawal/delivery of gold to customers?
2. Do you agree with customers on their rights, insurance arrangements, details of logistics provider, etc. for each transaction / on contract basis?

Assessment notes:

Area(s) of improvement:

11

I promise to adhere to minimum KYC requirements before initiating business with a new customer and update this information periodically

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you conduct due diligence / KYC checks to evaluate customers before initiating business with them?
2. Do you conduct business with the customers even if they are unable to fulfil the KYC requirements?
3. Do you update this information periodically?

Assessment notes:

Area(s) of improvement:

12

I promise to offer educational material on products, pricing and trading practices to the customers or point them to credible sources of such information

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Have you developed any educational material for customers?
Do you include details on products, pricing, and trading practices in such materials?
2. Do you train frontend staff to offer material to educate customers?
3. In absence of in-house materials, do you point customers to other external sources of credible information?

Assessment notes:

Area(s) of improvement:

13

I promise to implement adequate systems and mechanisms to receive, record and redress customer queries and complaints

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you have systems in place to receive customer complaints?
2. Upon receiving a complaint, do you commit a timeline for redressal?
3. Do you maintain records of the customer complaints?
If yes, for how long?

Assessment notes:

Area(s) of improvement:

14

I promise to clearly communicate and adhere to terms, conditions and timelines of payment with every customer and supplier, consistently and impartially

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you communicate and clearly align on key terms of payment before finalising trade with suppliers / customers?
2. Do you ensure that you as well as the suppliers adhere to the terms?
3. Do you have mechanisms in place for events when one party violates the terms?

Assessment notes:

Area(s) of improvement:

15

I promise to proactively identify major financial and non-financial risks to the business and take appropriate steps to mitigate / manage the risks

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you identify, measure and monitor major financial and non-financial risks to business?
2. Do you have risk management practices including policies, governance in place to mitigate / manage the identified risks?

Assessment notes:

Area(s) of improvement:

16

I promise to have a dedicated and trained risk management team without linkage to any business incentives

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you have a team that is independent of other business operations that is responsible for risk management?
2. Do you have appropriate policies, processes and governance to ensure their independence?

Assessment notes:

Area(s) of improvement:

17

I promise to comply with all applicable laws and regulations, maintain adequate documentation and disclose required information to regulatory/statutory bodies

Current state:

- | | |
|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Observed | <input type="checkbox"/> Broadly observed |
| <input type="checkbox"/> Partly observed | <input type="checkbox"/> Not observed |

Key questions to consider:

1. Do you comply with applicable laws and regulations that are applicable to the bullion trading activity and business operations in India?
2. Do you maintain records and documentation for all compliance and audit procedures? Does it include details of queries from regulator, events of non-compliance and corresponding actions taken?
3. Do you conduct internal audits and record its findings for reasonable period?
4. Do you disclose this information to customer or regulatory authorities when requested?

Key comments:

Area(s) of improvement:

Activity	Sound Practices	Rating
Sourcing	1. I promise to buy high integrity gold from trustworthy suppliers, who adhere to responsible gold standards, after conducting adequate due diligence on them	O / BO / PO / NO
	2. I promise to conduct business transparently by ensuring due documentation for all transactions with suppliers	O / BO / PO / NO
Trading	3. I promise to offer fair and clear information on key product characteristics to my customers	O / BO / PO / NO
	4. I promise to maintain fairness and transparency for the prices and fees charged to the customers	O / BO / PO / NO
	5. I promise to clearly communicate terms and conditions including customer rights related to gold ownership	O / BO / PO / NO
	6. I promise to appropriately hedge the risks incurred through trading or holding physical inventory or currency	O / BO / PO / NO
	7. I promise to maintain transaction receipts/business contracts which contain relevant information about product, price and transaction	O / BO / PO / NO
	8. I promise to take appropriate measures to minimise liquidity, pricing, settlement and transaction related risks for my business and customers (Additional best practices)	O / BO / PO / NO
Transportation, storage and withdrawals	9. I promise to have adequate operational processes for safe handling of gold assets and insurance to cover them against any event of loss	O / BO / PO / NO
	10. I promise to disclose the terms and conditions and protect customer rights with regards to withdrawing or taking delivery of their gold holdings	O / BO / PO / NO
Customer and Complaints Management	11. I promise to adhere to minimum KYC requirements before initiating business with a new customer and update this information periodically	O / BO / PO / NO
	12. I promise to offer educational material on products, pricing and trading practices to the customers or point them to credible sources of such information	O / BO / PO / NO
	13. I promise to implement adequate systems and mechanisms to receive, record and redress customer queries and complaints	O / BO / PO / NO
Payments	14. I promise to clearly communicate and adhere to terms, conditions and timelines of payment with every customer and supplier, consistently and impartially	O / BO / PO / NO
Risk Management	15. I promise to proactively identify major financial and non-financial risks to the business and take appropriate steps to mitigate / manage the risks	O / BO / PO / NO
	16. I promise to have a dedicated and trained risk management team without linkage to any business incentives (Additional best practices)	O / BO / PO / NO
Audit and Compliance	17. I promise to comply with all applicable laws and regulations, maintain adequate documentation and disclose required information to regulatory/statutory bodies	O / BO / PO / NO

Annexure B: Version control

The Code of Conduct is a continuously evolving document intended to incorporate latest and best practices in the industry. The below table reflects the history of updates and latest version of the document.

S.No.	Version Number	Timeline
1.	Code of Conduct_Bullion Trading_vMar2021	Mar, 2021

Notes