



# Summary Assessment Report

**LBMA Responsible Gold Guidance  
LBMA Responsible Silver Guidance  
Summary Assessment Report  
based on ISO 19011:2011**

AGOSI, Allgemeine Gold- und Silberscheideanstalt AG  
Pforzheim, Germany

**Full Assessment**

Report date: 26.03.2019

Prepared for:

AGOSI, Allgemeine Gold- und Silberscheideanstalt AG

London Bullion Market Association (LBMA)

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# 1. Engagement description

The client, AGOSI, Allgemeine Gold- und Silberscheideanstalt AG, Pforzheim, Germany (hereinafter referred to as AGOSI) mandated KPMG Cert GmbH Umweltgutachterorganisation (hereinafter referred to as KPMG Cert) by written contract dated 17 December 2018 to conduct a 3rd party audit of their Supply Chain Due Diligence according to the LBMA Responsible Gold and Silver Guidance and ISO 19011. Qualified auditors performed the audit of Supply Chain Due Diligence pursuant to the LBMA Responsible Gold Guidance (RGG v7), Responsible Silver Guidance (v1), ISO 19011 and the Third Party Audit Guidance (for Gold v3, for Silver v1).

In 2018, an Assessment Review was performed for reporting year 2017. This year a Full Assessment covering both Gold and Silver was performed due to the implementation of the LBMA Responsible Silver Guidance. The Full Assessment on Gold was conducted in accordance with Step 4 of the LBMA Responsible Gold Guidance (v7) and Responsible Silver Guidance (v1) required to acquire LBMA Certification and listing as Good Delivery Refiner.

# 2. Preface

In particular, this report contains the information regarding the auditors, the assessment scope, methodology, criteria, audit details comments, findings, and the auditor's conclusions based on the Assessment.

To guarantee the transparency of the Summary Report, the format and entries are based on the Responsible Gold Guidance (v7) and the reporting template "Appendix 8 – ISO19011 Refiner Summary Report" published by the LBMA in the Third Party Audit Guidance (Gold v3, Silver v1).

This Refiner Report is submitted (along with the Summary Report) to AGOSI and to the London Bullion Market Association (LBMA), in order for AGOSI to maintain and achieve LBMA Responsible Gold and Silver Certification as well as listing as Good Delivery Refiner. The information presented in this report has been reviewed and approved by the refiner and its management. The report is not intended as a basis for third party (business) decisions. We accept no responsibility for third parties.

# 3. Assessment information and scope

Assessment information	
Refiner Name	AGOSI, Allgemeine Gold- und Silberscheideanstalt AG
Reference Standard LBMA RGG	ISO 19011:2011
Assessment Period	1 January 2018 – 31 December 2018
Refiner location(s) included in the assessment scope	AGOSI, Allgemeine Gold- und Silberscheideanstalt AG Kanzlerstraße 17, 75175 Pforzheim
Audit type:	Multi-metal Full Assessment: LBMA RGG, LBMA RSG

## 4. Refiner information

Refiner information									
Refiner Location(s)	AGOSI, Allgemeine Gold- und Silberscheideanstalt AG Kanzlerstraße 17, 75175 Pforzheim								
Refiner Contact Person:									
Name	Mr. Karl-Heinz Flach								
Title:	Director TQM & Services & CoC/ LBMA Compliance Officer								
Email:	karl-heinz.flach(at)agosi.de								
Phone:	+49 (0) 7231 960-294								
Certifications currently held:	<table border="0"> <tr> <td>LBMA RGG</td> <td>ISO 14001</td> </tr> <tr> <td>RJC COP</td> <td>ISO 50001</td> </tr> <tr> <td>RJC CoC</td> <td>ISO/IEC 17025</td> </tr> <tr> <td>ISO 9001</td> <td>Waste Management company</td> </tr> </table>	LBMA RGG	ISO 14001	RJC COP	ISO 50001	RJC CoC	ISO/IEC 17025	ISO 9001	Waste Management company
LBMA RGG	ISO 14001								
RJC COP	ISO 50001								
RJC CoC	ISO/IEC 17025								
ISO 9001	Waste Management company								
Refiner details:	Refiner for recycled gold and other precious metals								

## 5. Audit team

Audit Team	
Auditor Independence / Independence of all team members (including trainees and Independent Quality Reviewer):	<p>The auditors and the topic experts confirm that they are fully independent from the refiner audited and do not have any conflicts of interest that would prevent them from objectively assessing the performance of the client.</p> <p>KPMG Cert is an approved service provider (team auditors are LBMA approved). The auditors have completed required LBMA trainings. In addition, the KPMG Cert handbook defines independence requirements which are obligatory for all team members.</p>

## 6. Limitations

There were no significant or inherent limitations or areas not covered that were within the assessment scope.

## 7. Assessment methodology

The assessment consisted of collecting and reviewing objective evidence including documentation, employee and top management interviews as well as observations demonstrating that AGOSI's management system and supply chain due diligence procedures comply with the LBMA RGG and RSG.

The following documents, policies, procedures, reports and screenshots were reviewed by the audit team during the audit period (desktop review, onsite audit and reporting) and serve evidence of compliance with the LBMA RGG and RSG standard:

- Supply Chain Due Diligence-Policy on Precious Metals<sup>1</sup>
- Management System policies and procedures, Integrated Management System Handbook (ISO 9001, 14001, 50001 RJC COP, RJC CoC, LBMA RGG and RSG), Precious Metals Handbook; Organigram, Role appointment and assignment, Document control (Lotus Notes), policies regarding human rights
- Compliance meeting protocols (held monthly, four fix meetings)
- Risk assessment documentation (BPS Scoring procedure, including criteria and methodology, documents money laundering prevention process)
- Gold counterparty due diligence procedures and corresponding documentation (KYC dossiers, sales and accounting process for vetting, approving and setting up new clients, checklist and ratings, blacklist)
- Quality Procedures for quality check of older customer dossiers
- Money Laundering Guidance document
- Training documentation and participation lists for due diligence according to RJC/LBMA Responsible Gold/ Silver Guidance, money-laundering
- Transaction documentation (digital and physical) : Delivery notes, date and weight of goods delivered (post and prior to refining), descriptions of goods delivered, lot I.D. number, laboratory assessments (precious metal assay), origin of recycled material (location of counterparty), internal smelting approval and material composition, ERP controls and traceability, customer invoice
- Supplier's declaration
- Code of conduct
- Incoming Material Guideline for LBMA & RJC CoC conformance
- Management Review
- Proof (E-Mail) of correspondence with official authorities

The following departments were visited during the audit

- Precious Metals goods receipt (goods acceptance and controlling)
- Sales
- Smelter
- Vault and sampling station
- Laboratory

The following management members attended the opening / closing meeting:

- Director TQM & Services, CoC/LBMA Compliance Officer
- Manager Quality Management
- Internal Compliance Officer
- Director Sales & Precious Metals Services
- Assistant Sales & Precious Metals Services

Interviews were held with the following employees:

- Director TQM & Services, CoC/LBMA Compliance Officer
- Manager Quality Management
- Director Sales & Precious Metals Services
- Assistant Sales & Precious Metals Services
- Assistant Total Quality Management
- Sales Manager Refining Material Services
- Internal Compliance Officer
- Manager Gold Refining operations / Production Planning
- Employees Precious Metals goods receipt
- Employees sampling station

<sup>1</sup> <https://www.agosi.de/unternehmen/download/konfliktfreies-gold/>

## 8. Assessment criteria

Detected actual or potential gaps in the AGOSI management system that are relevant to the criteria and requirements established by the LBMA were assessed to determine compliance.

The KPMG Audit team considered and drew conclusions based on relevant evidence presented by the Refiner during the audit including observations, interviews, documents and records (on-site and remote). Relevant evidence was pertinent, reliable, objective, quantitative and or qualitative. In addition, the KPMG Audit team consults publically available sources when appropriate.

## 9. Assessment conclusion

Category	Subcategory	Compliant	Low	Non-compliance – risk level		
				Medium	High	Zero Tolerance
General information						
Step 1	1	✓				
	2	✓				
	3	✓				
	4		✓			
	5	✓				
Step 2	1		✓			
	2.1	✓				
	2.2	✓				
	2.3	✓				
	2.4	✓				
	3	✓				
Step 3	1	✓				
	2	✓				
	3	✓				
	4	✓				
Step 4	-	✓				
Step 5	-	✓				

Category	Subcategory	Compliant	Low	Non-compliance – risk level		
				Medium	High	Zero Tolerance
Based on the assessment conclusions, the overall rating of the Refiner's performance is determined to represent:			✓			

## 10. Follow up audit

A follow up audit is not required. In 2020 AGOSI intends to have a multi-metal Full Assessment to cover gold and silver due to the introduction of an all-new LBMA Guidance document based on the ISAE 3000 audit approach.

## 11. Final conclusion

The Auditors confirm that:

- ✓ The information provided by the refiner is true and accurate to the best knowledge of the Auditor(s) preparing this report
- ✓ The findings are based on verified objective evidence relevant to the time period for the assessment, traceable and unambiguous
- ✓ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective
- ✓ The Auditor(s) are properly qualified to carry out the assessment at this refiner's facility.

Cologne, 26 March 2019

KPMG Cert GmbH Umweltgutachterorganisation

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