

## **ROYAL MALAYSIAN CUSTOMS**

# **GOODS AND SERVICES TAX**

# GUIDE ON INVESTMENT PRECIOUS METALS (IPM)

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## **CONTENTS**

INTRODUCTION	1
Overview of Goods and Services Tax (GST)	1
GENERAL OPERATIONS OF THE INDUSTRY	1
GST TREATMENT ON INVESTMENT PRECIOUS METALS	2
GST Treatment on IPM	2
Criteria of Investment Precious Metals	3
Importation of Investment Precious Metals	5
Invoice	7
Input Tax Credit	8
FREQUENTLY ASKED QUESTIONS	9
INQUIRY	11
APPENDIX 1	12
APPENDIX 2	16
APPENDIX 3	18
APPENDIX 4	21

#### INTRODUCTION

1. This industry guide is prepared to assist businesses in understanding matters with regards to Goods and Services Tax (hereinafter referred to as "GST") treatment on investment precious metals (hereinafter referred to as "IPM").

#### **Overview of Goods and Services Tax (GST)**

- 2. GST is a multi-stage tax on domestic consumption. GST is charged on all taxable supplies of goods and services in Malaysia except those specifically exempted. GST is also charged on importation of goods and services into Malaysia.
- 3. Payment of tax is made in stages by the intermediaries in the production and distribution process. Although the tax would be paid throughout the production and distribution chain, only the value added at each stage is taxed thus avoiding double taxation.
- 4. In Malaysia, a person who is registered under the GST Act 2014 is known as a "registered person". A registered person is required to charge GST (output tax) on his taxable supply of goods and services made to his customers. He is allowed to claim back any GST incurred on his purchases (input tax) which are inputs to his business. Therefore, the tax itself is not a cost to the intermediaries and does not appear as an expense item in their financial statements.

#### **GENERAL OPERATIONS OF THE INDUSTRY**

- 5. With effect from the implementation of GST on 1.4. 2015, local supply of IPM in Malaysia is exempted from GST as specified under item 4, GST (Exempt Supply) Order 2014 to facilitate trading of IPM in Malaysia and in line with the recognition of IPM as an actively traded financial asset.
- 6. There is no refiner from Malaysia that is listed in the current "Good Delivery" list of the London Bullion Market Association (hereinafter referred to as "LBMA") or London Platinum and Palladium Market (hereinafter referred to as "LPPM"). In addition, there is no government agency in Malaysia to endorse the refiners and

ensure local IPM possess requisite quality to be traded on international bullion markets and accepted by international commodity exchanges. Hence, the main source of IPM is through importation.

- 7. FEDMAS is a representative of Standard & Industrial Research Institute of Malaysia (hereinafter referred to as "SIRIM") that is accredited under MS ISO/IEC 17025:2005 recognized by Malaysian Standards and International Organization for Standardization. FEDMAS ensures all gold jewellery sold in Malaysia complies with the standard of purity by conduct Cupellation Method or X-Ray Fluorescence method, which is tested based on Malaysian Standard (MS 1365: PART1:1994) developed by SIRIM under Trade Descriptions (Articles made of Precious Metals) Regulations 1994. However, FEDMAS does not endorse local IPM to be listed in LBMA or LPPM.
- 8. With effect from 1.1.2016, importation of IPM is given relief under item 31, GST (Relief) (Amendment) (No. 2) Order 2015 subject to the importer getting a certificate of relief as stated in para 20.
- 9. The importers of IPM who have been granted GST relief under item 31, GST (Relief) (Amendment) (No. 2) Order 2015 shall state the actual total value of supplies under Field 13, GST-03 Return.
- 10. Only precious metals which meet the prescribed criteria as specified under item 4, GST (Exempt Supply) Order 2014, will qualify as IPM. The prescribed criteria for IPM is stated in para 13-18.
- 11. Precious metals which do not meet the prescribed criteria does not qualify as IPM (hereinafter referred to as "non-IPM"). The supply of non-IPM is subject to GST at a standard rate. Examples of non-IPM are jewellery, scrap precious metals, precious metals which are refined by refiners who are not on the "Good Delivery" list of the LBMA or the LPPM, proof coins, numismatic coins and collector's coins.

#### **GST TREATMENT ON INVESTMENT PRECIOUS METALS**

#### **GST Treatment on IPM**

12. For the purpose of GST, the supply of IPM can be an exempt supply or a zero-

rated supply.

- (a) Exempt supply
  - (i) Local supply of investment precious metals as defined under item4, First Schedule, GST (Exempt Supply) Order 2014 are exempted from GST.
- (b) Standard-rated supply
  - (i) Non-IPM is subject to GST at a standard rate.
- (c) Zero-rate supply
  - (i) The exportation of IPM is to be zero-rated under section 17(1) (b), GST Act 2014.
- 13. The importation of IPM can be given relief from payment of GST if the importer meets the criteria set by the Director General. The certificate issued by the DG can be revoked/ cancelled if the importer does not meet the conditions set by the Director General.

#### **Criteria of Investment Precious Metals**

- 14. IPM must meet the following prescribed criteria as specified under item 4, GST (Exempt Supply) Order 2014, in order to qualify for GST exemption:
  - gold is of a purity of at least 99.5%, silver is of a purity of at least 99.9%,or platinum is of a purity of at least 99%;
  - (b) is in the form of a bar, an ingot or a wafer; and
  - (c) possess investment characteristics.
- 15. "Investment characteristics" is defined under subitem 4(3), First Schedule, GST (Exempt Supply) Order 2014, as following:
  - (a) it has been refined by a refiner who is or was in the "Good Delivery" list of the LBMA (in the case of gold or silver); or a refiner who is or was in

the "Good Delivery" list of the LPPM (in the case of platinum);

- (b) it bears a mark or characteristic that is accepted as an international standard guaranteeing its quality; and
- (c) it is traded at a price based on the spot price of gold, silver or platinum on the international bullion market.
- 16. IPM coin is exempted from GST, provided the gold coin is of a purity of at least 99.5%, silver coin is of a purity of at least 99.9% or platinum coin is or a purity of at least 99%; and it is or was legal tender in its country of origin.
- 17. Qualifying gold coins are as follows:
  - (a) America Buffalo coin;
  - (b) Australia Kangaroo Nugget coin;
  - (c) Australia Lunar coin;
  - (d) Austria Philharmoniker coin;
  - (e) Canada Maple Leaf coin;
  - (f) China Panda coin;
  - (g) Malaysia Kijang Emas coin;
  - (h) Mexico Libertad coin;
  - (i) Singapore Lion coin;
  - (j) United Kingdom Britannia coin.
- 18. Qualifying silver coins are as follows:
  - (a) America Eagle coin;
  - (b) Australia Kookaburra coin;
  - (c) Australia Koala coin;

- (d) Australia Lunar coin;
- (e) Austria Philharmoniker coin;
- (f) Canada Maple Leaf coin;
- (g) China Panda coin;
- (h) Mexico Libertad coin;
- (i) United Kingdom Britannia coin.
- 19. Qualifying platinum coins are as follows
  - (a) America Eagle coin;
  - (b) Australia Koala coin;
  - (c) Australia Platypus coin;
  - (d) Canada Maple Leaf coin.
- 20. Under sub items 1(d), (e) and (f), First Schedule, GST (Exempt Supply) Order 2014, a proof coin, a numismatic coin or a collector's coin do not qualify as IPM and is subject to GST at a standard rate. For instance, Gold Dinar and Silver Dirham are traded at prices largely determined by their rarity and the quality of their numismatic value but not the spot price on the international bullion market.

#### **Importation of Investment Precious Metals**

21. A person who meets the conditions imposed under item 31, GST (Relief) (Amendment) (No. 1), may apply for Director General's approval for relief on importation of IPM by submitting the application manually to Customs office, GST Division (controlling station) where the applicant's business operates. You may download the application forms i.e. Lampiran A as attached in Appendix 1 and Lampiran C as attached in Appendix 2, from the GST website. A certificate of GST relief on IPM (hereinafter referred to as CoGSTR) shall be issued by the Royal Malaysian Customs Department as attached in Appendix 3.

- 22. There are 4 types of applications, namely:
  - (a) new application of CoGSTR;
  - (b) renewal of CoGSTR;
  - (c) amendment of CoGSTR; and
  - (d) cancellation of CoGSTR.
- 23. Application of CoGSTR shall be furnished with security in the form of a bank guarantee to protect revenue. The amount of bank guarantee imposed is computed based on the following formula:

#### (total value of importation in a year X 6% GST) / 12 months

Total value of importation is determined by paragraph 4.1(a)(i), 4.1(a)(ii) or 4.1(b) of Lampiran A. New application of GSTR or renewal of GSTR will be pending for approval until the bank guarantee is received.

- 24. For new application, the applicant shall fill up and submit "Lampiran A", as attached in Appendix 1 and "Lampiran C", as attached in Appendix 2. Once the application is approved, the applicant will be given a reference number of CoGSTR.
- 25. Approval of CoGSTR is on a two-yearly renewal basis and any application for renewal must be made within 6 months before the expiry of each approval period. CoGSTR that approved under item 31, GST (Relief) (Amendment) (No. 2) Order 2015 is void upon expiration. Renewal of CoGSTR will maintain the same reference number and the validity will be extended for 2 years period from the date of approval. Renewal upon the expiration of CoGSTR is considered as new application.
- 26. An approved person shall immediately notify RMCD if there is any change of particulars such as name of applicant, company address, types of IPM and weight of IPM. An application for amendments shall be furnished with relevant documents.
- 27. Application for cancellation of CoGSTR shall be applied in writing with details of cancellation stated clearly. The last monthly statement should be submitted together with this application. IPM stock held on hand shall only be used for investment

purpose. GST shall be charged on IPM held on hand if it is used other than for investment purpose.

- 28. Provided no appeal has been made to the tribunal or court, an applicant who has been denied approval for relief, may apply to DG within 30 days from the date of rejection for a review of the decision as stipulated in section 124, GST Act 2014.
- 29. Approval of CoGSTR may be cancelled at any time without prior notice in the event of any misappropriation or misuse.
- 30. An approved person shall submit monthly statement by using "Lampiran 1", as attached in Appendix 3 by 15th of the following month.

#### Invoice

- 31. In order to differentiate between IPM that is given relief from payment of GST and local supply of IPM, an approved person is required to issue an invoice with specific information for an exempt supply of IPM.
  - (a) the invoice serial number
  - (b) the date of the invoice
  - (c) the name, address and number of CoGSTR
  - (d) the name and address of the person to whom the IPM are supplied
  - (e) a description sufficient to identify the IPM supplied as follows:
    - (i) a bar, an ingot or a wafer
      - type of IPM (gold, silver or platinum)
      - purity
      - name of refiner
      - unique serial number of IPM (if applicable)
      - unit price

#### (ii) IPM coins

- type of IPM (gold, silver or platinum)
- name of coin
- weight
- unit price
- quantity of IPM supplied
- total amount payable
- 32. The invoice should be issued within 30 days from the time of supply of IPM.

#### **Input Tax Credit**

33. A GST-registered person can claim input tax incurred in the course or furtherance of business that is attributable to taxable supplies. The input tax attributable for the making of exempt supplies is not claimable. For a mixed supplier that makes both taxable and exempt supplies, only the input tax attributable to taxable supplies is claimable. The amount of input tax entitled is determined by using the recoverable percentage of residual input tax.

#### FREQUENTLY ASKED QUESTIONS

# Q1. How do I distinguish whether the precious metals that I purchased is an IPM or non-IPM?

- A1. Generally, IPM can be assessed by examining the physical surface of IPM as followings:
  - (a) the name of the refiner and/or the refiner's hallmark that is stamped on the bar, ingot or wafer is in the "Good Delivery List" of the LBMA or LPPM. Sometimes, the name of specific bank is stamped on the bar, ingot or wafer as well;
  - (b) the purity reflected on the precious metal meets the minimum required purity content of IPM (e.g. gold is of a purity of at least 99.5%, silver is of a purity of at least 99.9%, or platinum is of a purity of at least 99%); and
  - (c) the type of precious metal (e.g. gold, silver or platinum). On the other hand, the refiners in the "Good Delivery List" of LBMA or LPPM possess Responsible Gold Certificate.

For instance,



Refiner: ABC Refinery (Australia) Pty

Ltd

Refinery location: Sydney, Australia

Current Bar Mark: The letters "ABC" within a circle superimposed on a graphical representation



Refiner: Daye Nonferrous Metals Co.,

Ltd

Refinery Location: Huangshi City,

China

Current Bar Mark: Chinese characters

followed by DAJIANG

- Q2. I am a jewellery manufacturer and import IPM for manufacturing purpose.

  Am I eligible to apply CoGSTR to relief from payment of GST during importation of IPM?
- A2. One of the condition that is stated under item 31, GST (Relief) (Amendment) (No. 2) Order 2015 is that the IPM is imported solely for investment purpose and not for manufacturing. Hence, you are not entitled to apply for CoGSTR.
- Q3. I have a CoGSTR to import IPM for investment. Can I sell the IPM to a manufacturer?
- A3. No. You cannot sell IPM imported under relief to manufacturers for non-investment purpose. Your CoGSTR may be revoked / cancelled.
- Q4. Is locally fabricated IPM entitled for GST exemption?
- A4. Locally fabricated IPM are not exempted without internationally accreditation and not in the "Goods Delivery" List of the LBMA or LPPM.

#### **INQUIRY**

1. For any inquiries for this guide please contact:

Sector IV

**GST** Division

Royal Malaysian Customs Department

Level 3 – 7, Block A, Menara Tulus,

No. 22, Persiaran Perdana, Presint 3,

62100 Putrajaya.

Email: gstsector4@customs.gov.my.

#### FURTHER ASSISTANCE AND INFORMATION ON GST

- 2. Further information on GST can be obtained from :
  - (a) GST website: www.gst.customs.gov.my
  - (b) Customs Call Center:

• Tel: 03-7806 7200 / 1-300-888-500

Fax: 03-7806 7599

• E-mail: ccc@customs.gov.my

#### **APPENDIX 1**

#### **LAMPIRAN A**

# PERMOHONAN SIJIL MENGIMPORT LOGAM BERHARGA PELABURAN BUTIRAN 31 JADUAL PERTAMA PERINTAH CUKAI BARANG DAN PERKHIDMATAN (PELEPASAN) 2014.

Pemohonan ini hendaklah dikemukakan ke Bahagian Cukai Barang dan Perkhidmatan di mana perniagaan pemohon beroperasi.

MAI	KLUMAT PEMOHON
Nam	a Pemohon :
No. 1	Kad Pengenalan:
Jawa	itan :
Alam	nat :
MAI	KLUMAT SYARIKAT
a.	Nama dan Alamat Syarikat :
b.	No. Pendaftaran Cukai Barang dan Perkhidmatan (sekiranya ada):
c.	
d.	No Sijil Perniagaan/ROC :

sertakan salinan sijil pendaftaran perniagaan memorandum of asssociation dan sebagainya.

i.	Nama	<b>:</b>
	Alamat	:
	Jawatan	:
	No Kad Peng	enalan :
ii.	Nama	:
	Alamat	:
	Jawatan	
		:enalan :
iii.	Nama	:
	Alamat	:
	Jawatan	:
	No Vod Dono	enalan :

f.

#### 3. BUTIR-BUTIR LOGAM BERHARGA PELABURAN

a. Jenis (emas/perak/platinum/syiling)/Bentuk (bar, jongkong, wafer atau					
	syiling)/Ketulenan:				
	(gunakan lampiran jika ruangan tidak mencukupi)				
b.	Nama dan negara penapis(Refiners) (bar, jongkong atau wafer):				
	(gunakan lampiran jika ruangan tidak mencukupi)				
c.	Katalog/gambar barang yang diimport disertakan (YA/TIDAK)				
d. Nama dan alamat pembekal :					
	(gunakan lampiran jika ruangan tidak mencukupi)				
e.	Jenama/Kuantiti/Berat :				
	(gunakan lampiran jika ruangan tidak mencukupi)				
f.	Harga yang dibeli:				
g.	Stesen import :				
	(Satu stesen sahaja)				
h.	Tarikh import :				

#### 4. MAKLUMAT-MAKLUMAT LAIN

- 4.1 Jumlah nilai pengimportan
  - (a) Dua tahun lepas

			(i)Tahun:	Jumlah(RM):
			(ii)Tahun:	Jumlah(RM):
		(b)	Dua belas bulan ya	ang akan datang(anggaran)
			Jumlah(RM):	
	4.2	Butir-b	utir jualan (potong	g yang mana tidak berkenaan)
		(a)	Untuk pasaran ten	npatan
		, ,	Untuk pasaran eks	•
			Untuk jualan peng kawasan tempat p	gedar (nyatakan nama dan alamat pengedar dan emasarannya)
5.	PENO	GAKUAI	N	
	Saya	dengan ir	ni mengakui dan m	engesahkan bahawa :
	(a)	Butir-b	utir yang diberika	n di atas adalah betul.
(b) IPM yang diimport hanya digunakan bagi tujuan				
	(c)	harga to		wafer) ini didagangkan pada suatu harga berdasarkan atau platinum, mengikut mana-mana yang berkenaan,
	(d)			a perubahan mengenai butir-butir yang diberi selepas
				engan ini saya akan mengemukakan butir-butirnya
	(e)			Piraja Malaysia dalam tempoh tujuh hari. Baya diluluskan, saya akan mengemukakan Penyata
	(0)			ran 1 mengenai pengimportan, penjualan dan baki stok
		kepada	Pengarah Kastam	Negeri berkaitan.
	Tanda	atangan	:	
	Nama		:	
	No. K	ad Penge	enalan :	
	Cop s	yarikat	:	
	Tarikl	•		

## **APPENDIX 2**

	<u>LAMPIRAN C</u>
	No. Kelulusan:
S	SIJIL KELULUSAN DI BAWAH BUTIRAN 31 JADUAL PERTAMA PERINTAH CUKAI BARANG DAN PERKHIDMATAN (PELEPASAN) 2014
<b>A</b> .	. Untuk dilengkapi dan ditandatangani oleh pengimport.
1.	Saya dengan ini mengesahkan bahawa saya ialah pengimport logam berharga pelaburan yang dinyatakan di bawah ini dan logam berharga pelaburan adalah di import untuk kegunaan pelaburan sahaja.
2.	Butir-butir logam berharga pelaburan ialah seperti berikut:
	(a) Jenis (emas/perak/platinum/syiling)
	(b) Bentuk (bar/jongkong/wafer atau syiling)
	(c) Ketulenan
	(d) Penapis(bar/jongkong atau wafer)
	(e) Jenama/Nama
	(f) Kuantiti
	(g) Berat
	(h) Tarikh dan stesen import
3.	Sekiranya saya melanggar syarat yang ditetapkan, saya akan membayar Cukai Barang dan Perkhidmatan yang terlibat.
Ta	ndatangan :
Na	ma :
No	o. Kad Pengenalan:

#### B. Kelulusan Sijil

Tandatangan Pengarah Kastam Negeri	:
Nama	:
Cop rasmi	:
Tarikh	:

#### SYARAT-SYARAT KELULUSAN

- (a) IPM yang diimport hanya digunakan bagi tujuan pelaburan.
- (b) IPM (bar, jongkong atau *wafer*) ini didagangkan pada suatu harga berdasarkan harga tetap emas, perak atau platinum, mengikut mana-mana yang berkenaan, di pasaran bullion antarabangsa.
- (c) Butir-butir perubahan hendaklah dikemukakan dalam tempoh tujuh hari ke Cawangan Kawalan Kemudahan, Bahagian Cukai Barang dan Perkhidmatan, sekiranya berlaku apa-apa perubahan mengenai butir-butir yang diberi dalam permohonan.
- (d) Penyata Bulanan seperti di Lampiran 1 mengenai pengimportan, penjualan dan baki stok hendaklah dikemukakan kepada Cawangan Kawalan Kemudahan, Bahagian Cukai Barang dan Perkhidmatan.
- (e) Sekiranya sijil ini dibatalkan, baki stok hendaklah digunakan bagi tujuan pelaburan sahaja. Jika ia tidak digunakan bagi tujuan pelaburan, CBP hendaklah dibayar.
- (f) Kelulusan sijil boleh dibatalkan bila-bila masa jika berlaku pelanggaran atau ketidakpatuhan terhadap mana-mana syarat yang ditetapkan atau peruntukan yang ditadbirkan oleh jabatan.

#### **APPENDIX 3**

#### **LAMPIRAN 1**

## PENYATA BULANAN PENGIMPORTAN PENJUALAN/BAKI STOK LOGAM BERHARGA PELABURAN (IPM) OLEH PENGIMPORT

Penyata Bulan	:	
Nama syarikat	:	
Alamat	:	

#### 1. PENGIMPORTAN

TARIKH IMPORT	NOMBOR BORANG IKRAR (K1)	STESEN IMPORT	JENIS LOGAM BERHARGA PELABURAN (IPM) DAN JENAMA	BERAT DAN KUANTITI (KG/PCS)	CIF (RM)	AMAUN CBP DIBERI PELEPASAN (RM)	CATATAN
JUMLAH							

#### 2. BUTIR-BUTIR PENJUALAN

TARIKH	JUALAN TEMPATAN/EKSPORT/LAIN- LAIN	NO. INVOIS/K2/K3	JENIS LOGAM BERHARGA PELABURAN (IPM) DAN JENAMA	BERAT DAN KUANTITI (KG/PCS)	NILAI (RM)	CATATAN
JUMLAH						

#### 3. BAKI STOK

JENIS LOGAM BERHARGA PELABURAN (IPM) DAN JENAMA	BERAT DAN KUANTITI PENGIMPORTAN (KG/PCS)	BERAT DAN KUANTITI JUALAN (KG/PCS)	BAKI STOK (KG/PCS)	CATATAN
JUALAN				

1. Pengal	uan Syarikat	2. Pengesahan Kasta	m
Adalah dis	hkan butir-butir tersebut di atas adalah benar	Telah disemak	
	(Tandatangan)	(Tanda	itangan)
Nama	:	Nama :	
Jawatan	:	Jawatan :	
Tarikh	:		
Cop Syarik	it :	Tarikh :	

#### **APPENDIX 4**

For the purpose of subitem 4(1) of the First Schedule to the GST (Exempt Supply) Order 2014 [P.U. (A) 271/2014], an IPM must be refined by –

(a) refiner who is or was in the "Good Delivery" list of the London Bullion Market Association in the case of gold comprising of the following:

Refiner	Refinery Location
ABC Refinery (Australia) Pty Ltd	Sydney, Australia
Allgemeine Gold - und Silberscheideanstalt AG	Pforzheim, Germany
Almalyk Mining and Metallurgical Complex (AMMC)	Almalyk, Uzbekistan
Anglogold Ashanti Mineração Ltda	Nova Lima, Brazil
Argor-Heraeus SA	Mendrisio, Switzerland
Asahi Pretec Corp	Kobe City, Japan
Asahi Refining Canada Limited	Brampton, Canada
Asahi Refining USA Inc.	Salt Lake City, USA
Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	Istanbul, Turkey
Aurubis AG (formerly Norddeutsche Affinererie AG)	Hamburg, Germany
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Quezon City, Philippines
Boliden Commercial AB	Skelleftehamn, Sweden
C. Hafner GmbH + Co. KG	Pforzheim 3, Germany
CCR Refinery - Glencore Canada Corporation	Montreal, Canada
Cendres + Métaux SA	Biel-Bienne, Switzerland
Chimet S.p.A.	Arezzo, Italy
Daye Nonferrous Metals Co., Ltd	Huangshi City, China
Elemetal Refining, LLC	Jackson, USA
Great Wall Precious Metals Co., LTD. Of CBPM	Chengdu, China

	<u></u>
Heimerle + Meule GmbH	Pforzheim, Germany
Heraeus Deutschland GmbH & Co. KG	Hanau, Germany
Heraeus Ltd Hong Kong	Fanling, Hong Kong
Inner Mongolia Qiankun Gold and Silver Refinery Share Company Ltd	Huhhot, China
Ishifuku Metal Industry Co Ltd	Soka Saitama, Japan
Istanbul Gold Refinery	Kuyumcukent, Turkey
Japan Mint	Osaka, Japan
Jiangxi Copper Company Ltd	Guixi City, China
JSC 'Ekaterinburg Non-Ferrous Metals Processing Plant	Verkhnyaya Pyshma2, Russia
JSC Uralelectromed	Verkhnyaya Pyshma, Russia
JX Nippon Mining & Metals Co., Ltd	Saganoseki, Japan
Kazzinc Ltd	Ust-Kamenogorsk, Kazakhstan
Kennecott Utah Copper LLC	Magna, USA
Kyrgyzaltyn JSC	Karabalta, Kyrgyzstan
L'azurde Company for Jewelry	Riyadh, Saudi Arabia
LS Nikko Copper Inc	Onsan (1), Korea
Matsuda Sangyo Co., Ltd	Iruma, Japan
Metalor Technologies (Hong Kong) Ltd	Kwai Chung, Hong Kong
Metalor Technologies SA	Marin, Switzerland
Metalor Technologies Singapore Pte Ltd	Singapore City
Metalor USA Refining Corp.	North Attleboro, USA
METALÚRGICA MET-MEX PEÑOLES, S.A. DE C.V	Torreon, Mexico
Mitsubishi Materials Corp.	Naoshima, Japan
Mitsui Mining & Smelting Co., Ltd	Takehara, Japan

MMTC-PAMP India Pvt. Ltd	Mewat, India
Moscow Special Alloys Processing Plant	Moscow, Russia
Nadir Metal Rafineri San. Ve Tic. A.Ş.	Bahçelievler, Turkey
Navoi Mining and Metallurgical Combinat (NMMC)	Navoi, Uzbekistan
Nihon Material Co., Ltd	Noda-City, Japan
OJSC Krastsvetmet	Krasnoyarsk, Russia
OJSC Novosibirsk Refinery	Novosibirsk, Russia
Pamp SA	Castel San Pietro, Switzerland
Prioksky Plant of Non-Ferrous Metals	Kasimov, Russia
PT Aneka Tambang (Persero) Tbk (Logam Mulia)	Jakarta, Indonesia
PX Prcinox SA	La Chaux-de-Fonds, Switzerland
Rand Refinery (Pty) Ltd	Germiston, South Africa
Republic Metals Corporation	Miami, USA
Royal Canadian Mint	Ottawa, Canada
Schöne Edelmetaal B.V.	Amsterdam, Netherlands
Sempsa Joyeria Plateria SA	Madrid, Spain
Shandong Zhaojin Gold and Silver Refinery Co. Ltd	Zhaoyuan City, China
Sichuan Tianze Precious Metals Co., Ltd	Chengdu 2, China
SOE Shyolkovsky Factory of Secondary Precious etals	Shyolkovo, Russia
Solar Applied Materials Technology Corp.	Danong Village, Taiwan
Sumitomo Metal Mining Co., Ltd	Toyo, Saijo, Japan
T.C.A S.p.A	Capolona, Italy
Tanaka Kikinzoku Kogyo K.K.	Hiratsuka, Japan
The Refinery of Shandong Gold Mining Co., Ltd	Laizhou City, China
Tokuriki Honten Co., Ltd	Kuki, Japan

Umicore Brasil Ltda	Guarulhos, Brazil
Umicore SA Business Unit Precious Metals Refining	Hoboken, USA
Valcambi S.A.	Balerna, Switzerland
Western Australian Mint (T/a The Perth Mint)	Newburn, Australia
Zhongyuan Gold Smelter of Zhongjin Gold Corporation	Sanmenxia City, China
Zijin Mining Group Co. Ltd	Shanghang, China

Please refer to LBMA's website for its "Good Delivery" list of gold refiners at http://www.lbma.org.uk/the-good-delivery-list

(b) a refiner who is or was in the "Good Delivery" list of the London Bullion Market Association in the case of silver comprising of the following:

Refiner	Refinery Location
Allgemeine Gold- und Silberscheideanstalt AG	Pforzheim, Germany
Almalyk Mining and Metallurgical Complex	Almalyk, Uzbekistan
Anyang Yubei Gold and Lead Co., Ltd	Anyang City, China
Argor-Heraeus SA	Mendrisio, Switzerland
Asahi Pretec Corp	Saijo, Japan
Asahi Refining Canada Limited	Brampton, Canada
Asahi Refining USA Inc.	Salt Lake City, USA
Aurubis AG	Hamburg, Germany
Boliden Commercial AB	Skelleftehamn, Sweden
Britannia Refined Metals Ltd	Gravesend, UK
CCR Refinery - Glencore Canada Corporation	Montreal, Canada
Chenzhou City Jingui Silver Industry Co., Ltd	Chenzhou City, China
Chimet S.p.A.	Arezzo, Italy
Daye Nonferrrous Metals Company	Huangshi City, China

Doduco GmbH	Pforzheim 2, Germany
Dowa Metals & Mining Co Ltd	Kazuno, Japan
Elemetal Refining, LLC	Jackson, USA
Great Wall Precious Metals Co., LTD. Of CBPM	Chengdu, China
Guangxi Chengyuan Mining and Smelting Co. Ltd	Hechi City, China
Henan Jinli Gold and Lead Co., Ltd	Jiyuan City 2, China
Henan Yuguang Gold and Lead Company Ltd	Jiyuan City, China
Heraeus Deutschland GmbH & Co. KG	Hanau, Germany
Heraeus Ltd Hong Kong	Fanling, Hong Kong
Hunan Huaxin Rare & Precious Metals Technologies Co., Ltd	Hunan Province, China
Hunan Shuikoushan Nonferrous Metals Group Co Ltd (SKS)	Changning, Hunan, China
Hunan Yuteng Nonferrous Metals Co., Ltd	Chenzhou City, China
Inner Mongolia Qiankun Gold and Silver Refinery Share Company Ltd	Huhhot, China
Ishifuku Metal Industry Co Ltd	Soka, Saitama, Japan
Japan Mint	Osaka, Japan
JBR Recovery Ltd	West Bromwich, UK
Jiangxi Copper Company Ltd	Guixi City, China
Jiangxi Longtianyong Nonferrous Metals Co., Ltd	Ji An City, China
JSC 'Ekaterinburg Non-Ferrous Metals Processing Plant'	Verkhnyaya Pyshma2, Russia
JSC Uralelectromed	Verkhnyaya Pyshma, Russia
JX Nippon Mining & Metals Co., Ltd	Hitachi, Japan
Kazakhmys Smelting LLC - Balkhash Metallurgical Complex	Balkhash, Kazakhstan
Kazzinc Ltd	Ust-Kamenogorsk, Kazakhstan

Kennecott Utah Copper Corp.	Magna, USA
KGHM Polska Miedz SA	Glogow, Poland
Korea Zinc Co., Ltd	Onsan, Korea
LS Nikko Copper Inc	Onsan, Korea
Matsuda Sangyo Co Ltd	Matsuda Sangyo Co Ltd, Japan
Metalor Technologies SA	Marin, Switzerland
Metalor USA Refining Corp.	North Attleboro, USA
METALÚRGICA MET-MEX PEÑOLES, S.A. DE C.V	Torreon, Mexico
Mitsubishi Materials Corp.	Naoshima, Japan
Mitsui Mining & Smelting Co., Ltd - Kamioka	Kamioka, Japan
Mitsui Mining & Smelting Co., Ltd - Takehara	Takehara, Japan
MMTC-PAMP India Pvt. Ltd	Mewat, India
Nadir Metal Rafineri San. Ve Tic. A.Ş.	Bahçelievler, Turkey
OJSC Krastsvetmet	Krasnoyarsk, Russia
OJSC Novosibirsk Refinery	Novosibirsk, Russia
PAMP SA	Castel San Pietro, Switzerland
Prioksky Plant of Non-Ferrous Metals	Kasimov Ryazan, Russia
Rand Refinery (Pty) Ltd	Germiston, South Africa
Remondis Argentia B.V	Moerdijk, Netherlands
Republic Metals Corporation	Miami, USA
Royal Canadian Mint	Ottawa, Canada
SAXONIA Edelmetalle GmbH	Halsbrücke, Germany
Schöne Edelmetaal B. V.	Amsterdam, Netherlands
Sempsa Joyeria Plateria SA	Madrid, Spain
Shandong Zhaojin Gold and Silver Refinery Co. Ltd	Zhaoyuan City, China

Shenzhen Zhongjin Lingnan Nonfemet Company Limited	Shaoguan, China
Shuikoushan Nonferrous Metals Group Co Ltd (SKS)	Changning, Hunan, China
Sichuan Tianze Precious Metals Co., Ltd	Chengdu 2, China
SOE Shyolkovsky Factory of Secondary Precious Metals	Shyolkovo, Russia
Solar Applied Materials Technology Corp.	Danong Village, Taiwan
Sumitomo Metal Mining Co., Ltd.	Toyo (Saijo), Japan
Tanaka Kikinzoku Kogyo K.K.	Tomioka, Japan
Teck Metals Ltd	Trail, Canada
The Refinery of Shandong Gold Mining Co., Ltd	Laizhou City, China
Thessco Ltd	Sheffield, UK
Toho Zinc Co., Ltd	Osakikamijima, Japan
Tokuriki Honten & Co Ltd	Kuki, Japan
Tongling Nonferrous Metals Group., Ltd	Tongling City, China
Umicore Precious Metals (Thailand) Ltd	Bangkok, Thailand
Umicore SA, Business Unit, Precious Metals	Hoboken, USA
Valcambi S.A.	Balerna, Switzerland
Western Australian Mint (T/a The Perth Mint)	Newburn, Australia
Yanggu Xiangguang Copper Co., Ltd	Yanggu County, China
Yunnan Chihong Zinc & Germanium Co. Ltd	Qujing City, China
Yunnan Copper Industry Co Ltd	Kunming, China
Zhuzhou Smelter Group Co. Ltd	Zhuzhou, China

Please refer to LBMA's website for its "Good Delivery" list of silver refiners at http://www.lbma.org.uk/the-good-delivery-list

(c) A refiner who is or was in the "Good Delivery" list of the London Bullion Market Association in the case of platinum comprising of the following:

Refiner	Country
Heraeus Precious Metals GmbH & Co. KG (with effect from 28th April 2015)	Germany
Saxonia Edelmetalle GmbH (with effect from 17th March 2015)	Germany
Johnson Matthey plc	Great Britain
Heraeus Limited (with effect from 21st July 2008)	Hong Kong
Hindustan Platinum Pvt. Ltd.	India
Chimet spA	Italy
Aida Chemical Industries Co. Ltd. (with effect from 14th June 2012)	Japan
2. Asahi Pretec Corp.	
3. Furuya Metal Co Ltd of Japan	
4. Ishifuku Metal Industry Co. Limited	
5. Materials Eco-Refining Co., Ltd. (with effect from 6th September 2012)	
6. Matsuda Sangyo Co. Limited	
7. Tanaka Kikinzoku Kogyo K.K.	
8. Tokuriki Honten Co. Limited	
Ekaterinburg Non-Ferrous Metal Processing Plant	Russia
2. Krasnoyarsk Non-Ferrous Metals Plant	
1. Heraeus South Africa (Pty) Ltd. (with effect from 18th June 2012 formerly Heraeus Refinery SA (Pty) Ltd.)	South Africa
2. Impala Platinum Limited	
3. Lonmin PLC/Western Platinum Limited (formerly Western Platinum Refinery Limited) (formerly Lonmin Platinum Ingots)	
4. Rustenburg Platinum Mines Limited	
1. Argor-Heraeus SA	Switzerland
2. Metalor Technologies SA	
3. PAMP SA	
4. Valcambi SA	

Solar Applied Materials Technology Corp. (with effect from 1 <sup>st</sup> January 2010)	Taiwan
1. BASF Corporation (with effect from 1st April 2010) (formerly BASF Catalysts LLC, Seneca with effect from 1st February 2007) (formerly Engelhard Corporation, Carteret)	USA
2. Heraeus Precious Metals North America LLC (with effect from 1st July 2012)	
3. Johnson Matthey Inc.	
4. Sabin Metal Corporation	

Please refer to LPPM's website for its "Good Delivery" list of platinum refiners at http://www.lppm.com/platinum-list/