



Statement relating to complaints and allegations by RAID

9th July 2020

On 8th July, RAID, a civil society organization has called for the London Bullion Market Association (LBMA) to suspend MMTC-PAMP from the Good Delivery List of gold and silver refiners.

In its press release, RAID makes several serious allegations and insinuations against MMTC-PAMP in connection with a recent independent assessment by Synergy Global Consulting (Synergy)* of operations at the North Mara Gold Mine (NMGM) in Tanzania.

MMTC-PAMP categorically refutes each and every complaint and allegations made by RAID and, in particular, stresses the following points:

Synergy is an independent third-party consultancy with over 20 years' experience in helping companies, governments, donors, civil society and community-based organisations enhance the social impacts of large-scale and artisanal mining in complex environment. MMTC-PAMP appointed Synergy to perform a detailed assessment of NMGM, following a request for proposal. The London Bullion Market Association (LBMA) approved the selection of Synergy.

As part of its extensive due diligence, Synergy organized private interviews with key external stakeholders, including numerous local community representatives during their on-site visit to North Mara Gold Mine and interviewed RAID staff members, including Anneke Van Woudenberg - Executive Director, Michael Elliot -Legal and Policy Researcher, and Tom Kenny -Research Consultant. In addition, the Synergy assessment also considered the extensive publicly available information from civil organisations, including RAID, which have engaged local stakeholders at the North Mara village.

MMTC-PAMP reiterates its established policies and procedures whereby it carries out enhanced due diligence on every supply chain and rigorously follows the London Bullion Market Association's (LBMA) Responsible Gold/Silver guidance, which is the industry program to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). As part of the LBMA RGG Program, MMTC-PAMP is subject to a yearly audit by an LBMA accredited auditor. The results of this audit are published yearly and submitted to the LBMA.

MMTC-PAMP has always operated and continues to operate under the regulatory framework established and managed by the LBMA. Consequently, any allegations will be handled appropriately by the LBMA as part of its regular oversight role.

MMTC-PAMP stands by its statement of July 3rd 2020 and the executive summary of the Synergy assessment relating to NMGM, which are available on our [website](#).

* Synergy has issued its own response to the RAID allegations, which is available [here](#).