

白银供应链风险减缓管理办法

Silver Supply Chain Risk Mitigation Management Measures

为了严格遵守国家关于职工权利、环境保护、公平交易等各项法律法规，积极参与白银供应链尽职调查工作，以确保白银来源的合法性。根据《伦敦贵金属市场协会（LBMA）责任白银指南》要求，特制定白银供应链风险减缓管理办法。

In order to strictly obey state laws and regulations in relation to employee's rights, environment protection, fair trade, etc., actively take part in silver supply chain due diligence work to make sure the sources of silver are legal. According to the requirements of LBMA Responsible Silver Guidance, we have specially formulated the Silver Supply Chain Risk Mitigation Management Measures.

1. 范围

1. Scope

本办法适用于河南豫光金铅股份有限公司（以下简称“公司”）根据白银供应链尽职调查政策已识别的所有风险。本办法所涉及的白银来源包括矿产银、阳极泥、粗铅及 2018 年 1 月 1 日后生产的各种形式的库存白银。

This measures applies to all identified risks according to Silver Supply Chain Due Diligence Policy by Henan Yuguang Gold and Lead Co. LTD. (hereinafter referred to as "the Company"). This measures applies to silver resources including mined silver, anode slime, lead bullion and all kinds of stockpiled silver produced after January 1, 2018.

2. 术语和定义

2. Terms and Definitions

本办法中涉及的术语和定义均采用《伦敦贵金属市场协会（LBMA）责任白银指南》所描述的内容。

All terms and definitions are as same as the description of LBMA Responsible Silver Guidance.

3. 风险减缓策略

3. Risk mitigation strategy

3.1 所有尽职调查过程中收集的信息以及供应链风险评估内识别的实际以及潜在风险需上报合规组长，再由合规组长整理后上呈合规总监。由合规总监最终确定风险级别。

3.1 All data and information collected through due diligence and identified and potential risks from supply chain assessment must be reported to compliance manager, and then reviewed and submitted to compliance director. Compliance director decide the risk level finally.

3.2 若白银供应链尽职调查结果得出以下结论，则需立即停止该白银交易并上报至有关部门：

3.2 If the due diligence results draw the following conclusions, it is needed to stop the deal immediately and report it to relevant department:

1) 存在有关白银提取、运输或贸易的系统性或广泛人权侵权行为，包括最严重的使用童工、酷刑、非人道以及侮辱人格对待方式、广泛的性暴力或其他严重反人权强迫劳动、战争罪、反人类罪或种族灭绝罪；

1) There are systematic or extensive human rights violations related to the extraction, transportation or trade of mined silver and recycled silver, including the most seriously child labour employing, cruel torture, inhuman and degrading treatment, extensive sex violence, other forced labour of serious anti human rights, war crimes, crimes against humanity or genocide;

- 2) 存在向非法的非政府武装组织提供直接或间接支持;
- 2) Direct or indirect supports are provided to illegal non-governmental armed organizations;
- 3) 存在通过欺诈掩盖白银的原产地;
- 3)The origin of mined silver and recycled silver is concealed by cheating;
- 4) 存在洗钱或恐怖主义融资;
- 4) There is money laundering or terrorist financing;
- 5) 存在以上 4 种事项可能性较高的情况。
- 5) There are cases where the abovefour matters are of high possibility.

3.3 若白银供应链尽职调查结果得出以下结论，则需立即暂停该白银的冶炼，直至供应商在 6 个月之内提供可证明其并不可能存在以下事项的额外数据或信息为止。若在 6 个月之内仍未提供相关证据，则需立即停止该白银交易并上报至有关部门：

3.3If the due diligence results draw the following conclusions, it is needed to suspend the smelting of silver immediately until suppliers provide additional data or information to provethat the following matters will not happen within 6 months. Ifrelevant evidences are not provided within 6 months, it is necessary to stop the deal immediately and report it torelevant department:

1) 可能存在有关白银提取、运输或贸易的系统性或广泛人权侵犯行为，包括最严重的使用童工、酷刑、非人道以及侮辱人格对待方式、广泛的性暴力或其他严重反人权强迫劳动、战争罪、反人类罪或种族灭绝罪；

1) There are systematic or extensive human rights violations related to the extraction, transportation or trade of minedsilver and recycledsilver, including the most seriously child labour employing, cruel torture, inhuman and degrading treatment, extensive sex violence, other forced labour of serious anti human rights, war crimes, crimes against humanity or genocide;

- 2) 可能存在向非法的非政府武装组织提供直接或间接支持;
- 2) Direct or indirect supports are provided to illegal non-governmental armed organizations;
- 3) 可能存在通过欺诈掩盖白银的原产地;
- 3) The origin of mined silver and recycled silver is concealed by cheating;
- 4) 可能存在洗钱或恐怖主义融资;
- 4) There is money laundering or terrorist financing;

3.4 可能存在以上 4 种事项可能若白银供应链尽职调查的内容并未完全满足，且被评估的供应商正在积极配合的情况下，该白银供应链尽职调查结果得出以下结论，则可继续该白银的冶炼，并要求供应商在 6 个月之内提供可证明其并不存在以下事项的额外数据或信息。若在 6 个月之内仍未提供相关证据，则需立即停止该白银交易并上报至有关部门：

3.4 If the content of supply chain due diligence is not fully satisfied and the evaluated supplier actively cooperates, with the supply chain due diligence results reaching the following conclusions, the smelting ofminedsilver and recycled silver can be continued, and the supplier is required to provide additional data or information to prove that the following matters will not happen within 6 months. If relevant evidences are not provided within 6 months, it is necessary to stop the deal immediately and report it to relevantdepartment:

- 1) 并未完成白银供应链尽职调查全部内容;
- 1) All contents of supply chain due diligence are not completed;
- 2) 向非法的公共或私人安全部队提供直接或间接支持;
- 2) Direct or indirect supports are provided to illegal public or private security forces

3) 贿赂或非欺诈原因而误导矿产品的原产地;

3) The origin of mined silver is misled by bribery or non-cheating reasons.

4) 未向政府缴纳应缴税费。

4) The tax payable is not paid to the government.

4. 风险减缓策略具体步骤

4. Specific Steps of Risk Mitigation Strategy

4.1 若白银供应链尽职调查结果符合 3.2 条款所述, 则合规总监需立即召集相关合规专员开立专项会议, 通报与该被评估供应商解除合同关系, 同时要求相关合规专员立即实施, 并形成书面文件上报上层领导。再由公司办公室上报相关政府部门。

4.1 If results of supply chain due diligence conform to what the Article 3.2 states, the Risk Compliance Director shall immediately organize relevant compliance officers to convene a special meeting, notifying the termination of contract with the supplier. Moreover, relevant compliance officers are required to carry out it immediately and formulate a written document for reporting it to the senior management. And then to be reported to relevant government departments by the office of the Company.

4.2 若白银供应链尽职调查结果符合 3.3 条款所述, 则合规总监需立即召集相关合规专员开立专项会议, 通报立即暂停使用该被评估供应商提供的矿产银或回收银, 直至其在 6 个月之内提供可供证明的额外数据或信息为止:

4.2 If results of supply chain due diligence conform to what the Article 3.3 states, the Risk Compliance Director shall immediately organize relevant compliance officers to convene a special meeting, notifying that it is needed to suspend the use of mineral silver and recycled silver supplied by the supplier until the supplier provides additional data or information that can be used for proving within 6 months:

1) 提供证明不存在有关白银提取、运输或贸易的系统性或广泛人权侵犯行为的政府性文件, 如被评估供应商所在地相关公安或商务部门出具的合法性证明等;

1) Provide government documents to prove that there is no systematic or extensive human right violations related to the extraction, transportation or trade of mined silver and recycled silver, such as a legitimate proof issued by the relevant public security or commerce department of location of the supplier;

2) 提供并未向非法武装组织提供直接或间接支持的证明文件;

2) Provide the documentary evidence to prove that direct or indirect supports are not provided to the illegal armed organizations;

3) 提供并未通过欺诈掩盖白银的原产地证明文件, 如相关政府部门出具的原产地证明;

3) Provide the documentary evidence to prove that the origin of mined silver and recycled silver is not concealed by cheating, such as the Certificate of Origin issued by relevant government departments;

4) 提供不存在洗钱或恐怖主义融资的证明文件。

4) Provide the documentary evidence to prove that there is no money laundering or terrorist financing;

由相关的合规专员负责收集以上所述额外数据或信息, 并按时向合规组长汇报情况进展, 合规组长制定监测报告上呈合规总监。若在 6 个月之内仍未提供相关证据, 则需按 4.1 条款实施。

The relevant compliance officers are responsible for collecting the above additional data or information and reporting the progress to the compliance manager on time, compliance manager prepare and send monitoring report to compliance director. If relevant evidences are not provided within 6 months, it is needed to implement what states in Article 4.1.

4.3 若白银供应链尽职调查结果符合 3.4 条款所述, 则合规总监需立即召集相关合规专员开立专项会议, 通报可继续使用使用该被评估供应商提供的矿产银, 阳极泥、粗铅, 直至其在 6 个月之内提供可供证明的额外数据或信息为止:

4.3 If results of supply chain due diligence conform to what the Article 3.4 states, the Compliance Director shall immediately organize relevant compliance officers to convene a special meeting, notifying that the use of mined silver and recycled silver supplied by the supplier can be continued until the supplier provides additional data or information that can be used for proving within 6 months:

- 1) 配合完成白银供应链尽职调查的内容;
- 1) Be cooperative to complete the silver supply chain due diligence;
- 2) 提供并未向非法的公共或私人安全部队提供直接或间接支持的证明文件;
- 2) Provide the documentary evidence to prove that direct or indirect supports are not provided to the illegal public or private security forces;
- 3) 提供并未贿赂或非欺诈原因而误导矿产品的原产地证明文件, 如相关政府部门出具的原产地证明;
- 3) Provide the documentary evidence to prove that the origin of mined silver and recycled silver is not misled by bribery or non-cheating reasons, such as the Certificate of Origin issued by relevant government departments;
- 4) 提供已向政府缴纳应缴税费的证明文件, 如付款凭证。
- 4) Provide the documentary evidence to prove that the tax payable is paid to the government, such as the payment receipt.

由相关的合规专员负责收集以上所述额外数据或信息, 并按时向合规组长汇报情况进展, 合规组长制定监测报告上呈合规总监。若在 6 个月之内仍未提供相关证据, 则需按 4.1 条款实施。

The relevant compliance officers are responsible for collecting the above additional data or information and reporting the progress to the Compliance Manager on time. If relevant evidences are not provided within 6 months, it is needed to implement what states in Article 4.1.

5. 要求和征求意见

5. Requirements and Solicit opinions

要求公司员工、供应商和商业伙伴遵守上述政策, 并采取必要措施来保障上述政策的贯彻落实。愿意接受客户和相关组织的监督, 并欢迎供应商和利益相关方对上述政策提供建议。

It is required that staff, suppliers and business partners of the Company shall comply with the above management measures and adopt necessary actions to ensure the implementation of above management measures. We would like to accept the supervising from customers and relevant organizations, also welcome advices and proposals from suppliers and stakeholders.

合规总监/Compliance director: _____

日期/Date: 2024.1.12

