

河南豫光金铅股份有限公司

**HENAN YUGUANG GOLD AND LEAD  
Co.,Ltd**

**LBMA 负责任白银供应链尽职调查**

**LBMA Responsible Silver Supply Chain  
Due Diligence**

管 理 体 系

**Management System**

## 白银供应链尽职调查政策

河南豫光金铅股份有限公司严格遵守《LBMA 负责任白银指南》，并按照其要求建立白银供应链尽职调查管理体系，积极推行白银供应链尽职调查工作，确保白银供应链符合《LBMA 负责任白银指南》的要求。我们将严格禁止供应链有如下行为：

Henan Yuguang Gold and Lead Co.,Ltd. strictly abides by the LBMA Responsible Silver Guidance, and establishes a due diligence management system for the silver supply chain in accordance with its requirements. The Company actively promotes due diligence in the silver supply chain to ensure that the silver supply chain meets the requirements of the LBMA Responsible Silver Guidance. We will strictly prohibit the following behaviors in the supply chain:

1. 人权侵犯行为，包括使用童工、酷刑、非人道以及侮辱人格对待方式、广泛的使用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. Violation of human rights, including the use of child labor, torture, inhuman and degrading treatment, widespread use of violence or other serious forms of forced labor against human right, war crimes, crimes against humanity or genocide;

2. 向非法武装组织或向通过供应链非法控制矿区、交易商、其他中介机构、运输线路的公共或私人安全部队提供直接或间接支持，或在整个供应链内非法征税或敲诈钱财或矿产品（“非法武装组织、公共或私人安全部队”）；

2. Direct or indirect support to illegal armed groups or to public or private security forces that illegally control mining areas, dealers, other intermediaries and transportation routes through the supply chain, or illegal taxation or extorting money or mineral products throughout the supply chain ( “illegal armed groups, public or private security forces” );

3. 通过贿赂或欺诈掩盖白银原产地；

3. Covering up the origin of silver through bribery or fraud;

4. 为遵照政府有关来自受冲突及高风险区域的矿产品的提取、贸易及出口税费要求；

4. Intention to comply with the Government ’ s tax requirements for extraction, trade and export of mineral products from conflict-affected and high-risk areas;

5. 洗钱或恐怖主义融资；

5. Money-laundering or terrorist financing;

6. 资助冲突；

6. Financing conflicts;

7. 从事高风险经营业务，例如武器、赌博、古董和艺术品、教派和其领导人；

7. Engaging in high-risk businesses, such as arms, gambling, antiques and works of art, sects and their leaders;

8. 受益人是政治敏感人物或通缉人员；

8. The beneficiary is a politically sensitive person or wanted person;

如果发现供应链中有如上行为，我们将采取措施，隔离已采购的产品，立即暂停或中断与该供应商的任何交易。

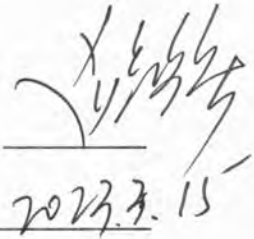
If the above behaviors are found in the supply chain, we will take measures to isolate the purchased products and immediately suspend or interrupt any transactions with the supplier.

我们将根据管理体系要求定期评估供应链风险，建立供应商尽职调查管理档案，确保供应链持续符合《LBMA 负责任白银指南》的要求。

We will regularly assess supply chain risks according to the requirements of the management system, establish due diligence management files for suppliers, and ensure that the supply chain continuously meets the requirements of the LBMA Responsible Silver Guidance.

合规总监/Compliance director: \_\_\_\_\_

日期/Date: \_\_\_\_\_

Handwritten signature and date: 2023.3.15

## 一、适用范围

### 1 Scope of Application

本规定适用于河南豫光金铅股份有限公司以及与河南豫光金铅股份有限公司白银的采购、加工、销售相关的所有供应商及相关合作伙伴（包括白银生产商、中间商、白银交易商、出口商和运输商）。

This standard is applicable to Henan Yuguang Gold and Lead Co.,Ltd and all silver suppliers and silver-related partners (including silver producers, middlemen, silver dealers, exporters and transporters) that have silver trading and silver processing with Henan Yuguang Gold and Lead Co.,Ltd.

## 二、引用术语

### 2 Quoted Terms

1.受冲突影响和高风险区域：受冲突影响和高风险区域的特点是存在武装冲突、大范围暴力活动或其他有害于民众的风险。武装冲突的形式多种多样，如国际冲突或非国际冲突，有可能涉及两个或两个以上的国家，也有可能是解放战争、叛乱、内战等。高风险地区是指有可能存在政局不稳或政治压迫、制度缺陷、不安全因素、民用基础设施崩溃，以及广泛暴力活动的地区。通常这类地区的特点是存在广泛侵犯人权和违反国际国内法律的现象。

1. Conflict-affected and high-risk areas (CAHRA): These areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as an international and non-international conflict, which may involve two or more states, or may consist of

wars of liberation, insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.

2. 人权：人权是指《国际人权法案》中定义的人权。该法案包括《世界人权宣言》《经济、社会、文化权利国际公约》《公民权利和政治权利国际公约》及其两项任择议定书（关于申诉程序和关于死刑）。

2. Human rights: Human rights are those defined in the International Bill of Human Rights. The Bill includes the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, as well as its two optional protocols (on the complaints procedure and on the death penalty).

3. 供应商：指任何个人或组织在白银和含银材料供应链的参与者。

3. Supplier: This term refers to any individual or organisation that is a participant in the supply chain for the supply of gold and gold-bearing materials.

4. 尽职调查：为准备商业交易及维持关系过程中对相关公司或组织进行的研究和分析。根据精炼商的意愿，需要评估的活动应包括经合组织尽职调查指南附件二中确定的风险、洗钱以及环境、社会和治理责任。

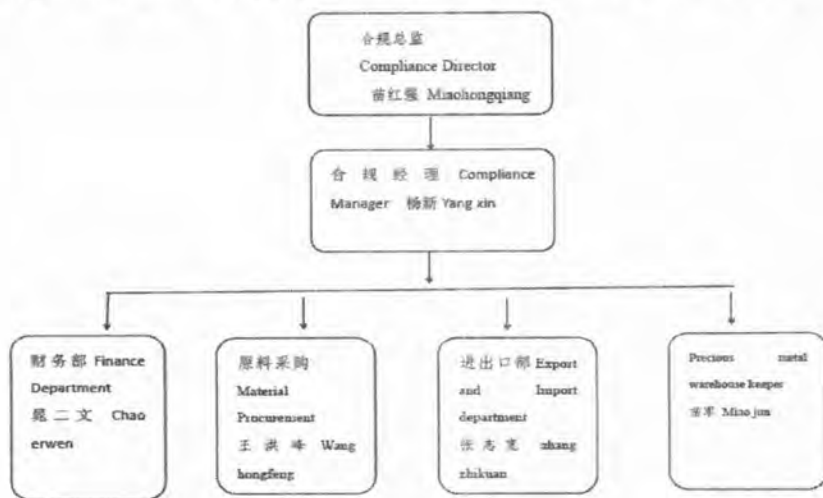
4. Due diligence: Research and analysis of a company or organization done in preparation for a business transaction and throughout the relationship. Activities to be assessed, based on the Refiner's appetite, should include those risks identified in the Annex II of the OECD Due Diligence Guidance, such as money laundering, as well as environment, social and governance responsibilities.

### 三、白银供应链公司内部组织架构及责任

#### 3 Internal Organizational Structure and Responsibilities of Silver Supply Chain Company

河南豫光金铅股份有限公司为白银供应链尽职调查专门设立了调查管理小组，组织结构如下：

Henan Yuguang Gold and Lead Co.,Ltd has set up a special management team for due diligence of silver supply chain. The organizational structure is as follows:



职责:

**Responsibilities:**

**1、合规总监**

**1 Compliance Director**

河南豫光金铅股份有限公司授权的高级管理者副总经理苗红强,对外根据我公司原料采购政策和公司的生产、财务以及销售情况等实际情况需要负责审批与供应商合作合同的签订,并负责对供应商进行审查相关事宜。对内高级管理者根据 LBMA 负责的白银指南文件,对相关员工进行培训,使相关负责人清楚的理解这一体系的目的和意义,明白自己在尽职调查政策实施中的职责。

The deputy general manager of the senior management Miao Hongqiang authorized by Henan Yuguang Gold and Lead Co.,Ltd , is responsible for reviewing and approving the signing of cooperation contracts with suppliers and responsible for reviewing related matters of suppliers. According to the LBMA Responsible Silver Guidelines document,internal senior managers train relevant employees.To make sure relevant responsible persons clearly understand the purpose and significance of this system and their responsibilities in the implementation of due diligence policies.

**2、合规经理**

**2 Compliance Manager**

协助高级管理人员全面负责白银供应链尽职调查事务,对白银供应链上的所有事情负责,确保公司整个白银供应链符合风险管理规定,并能有效识别风险、规避风险。负责白银供应链尽职调查及风险控制的培训,起草和更新白银供应链政策,为高级管理者提供准确的信息。

(1) 有权监查白银供应链尽职调查过程,并评估尽职调查是否充分进行;如果认为必要,有权要求提供附加文件或信息。

(2) 如果存在高风险供应链或交易,需要及时向业务分管副总汇报。

(3) 定期对员工进行白银供应链规则培训,起草和更新白银供应链规则,为高级管理层履责提供准确的信息。

(4) 每年至少一次对重要客户进行现场调查;

(5) 协助与鼓励白银原料供应商及白银交易客户承诺遵守白银供应链尽职规则;

(6) 如出现异常情况需及时向合高级管理者报告。

Assist senior management to be fully responsible for due diligence of silver supply chain, be responsible for all matters in silver supply chain, ensure that the whole silver supply chain of the company complies with risk management regulations, and can effectively identify and avoid risks. Responsible for silver supply chain due diligence and risk control training, drafting and updating silver supply chain policy, providing accurate information for senior managers.

(1) Have the right to inspect the due diligence process of silver supply chain and evaluate whether the due diligence is fully carried out; if necessary, request additional documents or information.

(2) If there is a high-risk supply chain or transaction, it is necessary to report to the vice president in charge of business in a timely manner.

(3) Regularly train employees on silver supply chain rules, draft and update silver supply chain rules, and provide accurate information for senior management to fulfill

their responsibilities.

(4) Conduct on-site investigation on important customers at least once a year;

(5) Assist and encourage silver raw material suppliers and silver trading customers to commit to abide by the due diligence rules of silver supply chain;

(6) In case of any abnormal situation, it is necessary to report to the compliance manager in time.

### 3、原料部及进出口部合规专员

#### 3 Compliance officer of Raw Material Department and I&E Department

负责原材料采购，确保矿粉、原材料供应的长期性、稳定性、安全性，并拒绝与高风险地区的相关企业、组织或国家合作。

The raw materials department and the import and export department are responsible for the procurement of raw materials to ensure the long-term, stability and safety of ore powder and raw materials supply, and refuse to cooperate with relevant enterprises, organizations or countries in high-risk areas.

### 3、财务部合规专员

#### 4 Compliance officer, finance department

财务部合规专员其职责为完整保存所有客户的交易凭证。

(1) 交易凭证包括但不限于：出入库单、客户相关合法资质证明等，记录保存至少 5 个会计年度；

(2) 如出现异常情况需及时向合规经理报告。

The compliance officer of the finance department is responsible for the complete preservation of transaction receipts of all customers.

(1) Transaction vouchers include but are not limited to: warehouse in / out documents, customer related legal qualification certificates, etc., and the records shall be kept for at least 5 accounting years;

(2) In case of any abnormal situation, it is necessary to report to the compliance manager in time.

### 5、贵金属仓库合规专员

#### 5 Precious metal warehouse compliance officer

(1) 仓库管理员应按照客户进行分类作好白银的入库、出库记录。

(2) 如出现异常情况需及时向合规经理报告。

(1) The warehouse keeper should classify the silver according to the customers and make a record of the storage and delivery of silver.

(2) In case of any abnormal situation, it is necessary to report to the compliance manager in time.

## 四、管理体系

### 4 Management System

#### 1.制定和发布公司关于 LBMA 负责任白银供应链尽职调查政策

#### 1.Develop and publish the Company' s due diligence policy on LBMA responsible silver supply chain

1.1 公司关于 LBMA 负责任白银的公告，告知供应链合作方严格遵守公司白银供应链管理制度，并公开接收社会各界及全公司内部员工的监督。

The Company makes Announcement on LBMA Responsible Silver to inform the supply chain partners to strictly abide by the Company's silver supply chain management system and publicly accept the supervision of all sectors of society and employees throughout the Company.

1.2 公司白银原料采购承诺，承诺遵守《LBMA 负责任白银指南》，积极参与并支持 LBMA 含银原料的可追溯性工作，严格遵守白银供应链无冲突冶炼厂计划要求，公司不与提供来自冲突影响地区及高风险地区的白银原料供应商进行交易。

For procurement of silver raw materials, the Company undertakes to abide by the LBMA Responsible Silver Guidance, actively participate in and support the traceability of LBMA silver-containing raw materials, strictly abide by the requirements of the Conflict-Free Refiner Plan in Silver Supply Chain, and not to trade with suppliers of silver raw materials from conflict-affected areas and high-risk areas.

## 2 尽职调查流程

### 2 Due diligence process

2.1 在交易前，将公司负责任白银供应地管理政策及要求明确告知对方。

Before the transaction, the Company shall clearly inform the other party of the management policies and requirements of the responsible silver supply place of the Company.

2.2 向供应商、客户发放尽职调查表，具体内容详见尽职调查表，收集相应的资质与资料。

Issue due diligence questionnaires to suppliers and customers. Please refer to the due diligence questionnaires for details to collect corresponding qualifications and data.

2.3 跟踪、收回尽职调查表，并进行风险评估。

Follow up and withdraw the due diligence questionnaire and conduct risk assessment.

2.4 编制尽职调查报告。

Prepare due diligence report.

## 3 尽职调查内容

### 3 Content of due diligence

3.1 尽职调查供应商包括矿产白银供应商、含银物料供应商、再生白银供应商、贸易商。

Due diligence suppliers include mineral silver suppliers, silver-containing material suppliers, recycled silver suppliers and traders.

3.2 尽职调查客户包括贸易商、买家等；

Due diligence customers include traders, buyers, etc.

3.3 在采购、销售交易发生前，要了解供应商、客户对于来自受冲突影响、高风险区域及存在的其它风险情况负责的供应链采购、销售情况。

Before purchasing and selling transactions occur, it is necessary to understand the purchasing and selling situation of the responsible supply chain of suppliers and customers from conflict-affected, high-risk areas and other risk situations.

3.4 尽职调查应包含供应链资质情况、白银原料产地识别，采矿与山口许可证，采矿情况信息证明是否侵犯人权、是否违规操作等，开采能力数据等。

Due diligence shall include supply chain qualification, identification of silver raw material origin, mining and mountain pass license, mining information to prove whether human rights are violated or operations are illegal, mining capacity data, etc.

#### 4 尽职调查措施

##### **Due diligence measures**

4.1 建立供应链客商档案。包括名称、法人、地址、联系方式、运营方式、交易合同等。

Establish supply chain customer/supplier files, including name, legal person, address, contact information, operation mode, transaction contract, etc.

4.2 对既有供应链需进行年度评估，如有供应商或客户，需要及时对其进行风险评估，符合体系要求方可进行交易。

Annual assessment is required for the existing supply chain. If there are suppliers or customers, risk assessment is required for them in a timely manner. Transactions can only be conducted if they meet the system requirements.

4.3 确定供应链没有任何的洗钱、诈骗或恐怖主义行为。

Determine that the supply chain is free of any money laundering, fraud or terrorist acts.

4.4 定期获取供应链公司的经营状况及交易目的信息。

Regularly obtain information on the operating status and transaction purpose of supply chain companies.

4.5 针对矿产白银供应商，在交易前，需要获得如下信息：

For mineral and silver suppliers, the following information shall be obtained before trading:

a) 白银的产地来源信息

a) Information on the origin of silver

b) 采矿许可证

b) Mining permits

c) 提供进/出口白银或者精矿许可证

c) Provision of permits for the import/export of silver or concentrate

d) 采矿情况信息证明

d) Proof of mining information

e) 定期对矿产白银客户进行尽职调查

e) Regular due diligence of mineral silver customers

4.6 针对回收白银供应链客商，在交易前，需要获得如下信息：

For customers in the silver recovery supply chain, the following information needs to be obtained before the transaction:

a) 再生白银供应商需提供合法的商业关系，包括再生银来源证明、收益人等信息

a) Suppliers of recycled silver are required to provide legal business relationships, including information such as proof of the source of recycled silver, beneficiaries, etc.

b) 公司会持续不断的对再生白银客户进行尽职调查



b) The Company will conduct continuous due diligence on recycled silver customers

## 5 风险评价标准

### 5 Risk evaluation criteria

#### 5.1 风险评价方法 Risk assessment method

供应链尽职调查应从三个维度进行:位置(包括来源)、供应商和材料类型风险。

The supply chain due diligence shall be conducted from three dimensions: location (including source and route), supply chain and type of raw materials.

5.1.1 位置风险识别应包括但不包括限于:

- a) 确定原料的来源, 并真实记录来源类别;
- b) 参阅中国批准的国际制裁名单, 多德-弗兰克法案第 1502 条, 欧盟 CAHRA 名单, 海德堡冲突晴雨表或类似的指数, 金融行动特别工作组 (FATF) 的报告(包括相关国家/地区报告 );
- c) 白银是否来源于一个已知储量有限、资源有限或预计白银产量有限的国家。

5.1.1 Location risk identification shall include but not be limited to:

- a) Determine the source of silver, and truly record the categories of source.
- b) Determine the source or route of gold and silver, and refer to the international sanctions list approved by the Chinese government, Section 1502 of the Dodd Frank Act, the EU CAHRA List, the Heidelberg Conflict Barometer, Report of the Financial Action Task Force on Money Laundering (FATF);
- c) Mineral silver originates from a country with known limited reserves, limited resources or expected limited silver production.

5.1.2 供应链风险识别应包括但不限于:使用工具包中的 KYC 问卷对供应链进行风险识别, 包括但不限于:

- a) 利用可靠的、独立来源的文件、数据或信息, 识别和核实供应链客户的名称、实际地址、公司注册和许可证信息;
- b) 识别核实最终受益人和关联方信息;
- c) 确认交易方及其最终受益人不在任何政府通缉的洗钱者或已知的欺诈者或恐怖分子名单中;
- d) 了解业务和财务信息, 预测业务关系的目的。

Supply chain risk identification shall include but not be limited to: The KYC questionnaire in toolkit is used to conduct the risk identification of supply chain, including but not limited to:

- a) Make use of reliable, independently sourced documents, data, or information, identify and verify the name, actual address, company registration and license information of supply chain customers;
- b) Identify and verify the ultimate beneficiary and related party information;
- c) Confirm that the silver trading parties and their ultimate beneficiaries are not included in any government's list of wanted money launderers or known fraudsters or terrorists;
- d) Understand the business and financial information, and predict the purpose of the business relationship.

5.1.3 物料风险主要关注手工和小规模开采矿（ASM）还是大规模开采矿（LSM）  
the main focus of material risk is on artisanal and small-scale mining (ASM) or large-scale mining (LSM).

5.2 基于风险状况对供应链进行分类

Classified the supply chain based on risk conditions

公司将供应链分为零容忍供应链、高风险供应链、中风险供应链、低风险供应链。

The company divides the supply chain into zero-tolerance Silver supply chain , high-risk supply chain, mid -risk supply chain, and low-risk supply chain.

5.2.1 零容忍供应链的评判标准

5.2.1 Standards for judging of zero tolerance supply chain

认为开采的白银来自被指定为世界遗产或保护区的地区

The Silver that is considered to be mining comes from areas designated as a World Heritage or Reserve;

已知开采或回收的白银的来源违反了国际制裁(包括但不限于联合国、欧盟、英国和美国)且得到中国政府承认;

The source of Silver known as mining or recycling violates international sanctions( including but not limited to the United Nations, the European Union, the United Kingdom , and the United States) and is recognized by the Chinese government;

被开采或回收白银的供应相对方、其他已知的上游公司或它们的最终受益人是已知的洗钱者、诈骗或恐怖分子,或曾涉嫌严重侵犯人权,直接或间接支持非法的非国家武装组织,或欺骗性地谎报矿物来源。

The supplier of mining or recycling Silver, other known upstream companies , or their ultimate beneficiaries are known money launders, frauds or terrorists, or have been suspected of seriously infringing human rights and indirectly support illegal non-national armed forces. Organization , or deceived the source of minerals.

如发现零容忍问题 , 不得与白银供应相对方建立业务关系 , 或必须立即终止现有关系 。

If zero tolerance is found, it shall not establish a business relationship with the supply of Silver , or it must immediately terminate the existing relationship.

5.2.2 根据 LBMA 和 OECD 相关规定, 结合公司实际情况, 特规定如下高风险供应链评判标准:

(1) 原料银来源于、中转或者运经冲突影响或侵犯人权高风险地区。

(2) 原料银声称来源于一个已知储量有限、资源有限或预计白银产量有限的国家。

(3) 原料银来源于已知的冲突影响和侵犯人权的高风险地区, 或者有理由怀疑经此地区中转的。

(4) 在白银供应链中的公司或者其他已知的上游公司位于一个有着洗钱、犯罪和贪污高风险的国家。

(5) 在白银供应链中的公司或者其他已知的上游公司的收益所有人是政治敏感人物。

(6) 在白银供应链中的公司或者其他已知的上游公司积极参与高风险商业活动, 例如武器、赌博、赌业、古董和艺术品、钻石, 宗教和宗教领袖。

当上述评判标准任何一条客观存在时，则该供应链被判定为高风险供应链。部门合规小组成员应立即准备材料上报合规专员，由合规经理上报合规总监，由合规总监批准采取应对措施，停止交易，强化尽职调查，消除风险。

5.2.2 According to the relevant regulations of LBMA and OECD, combined with the actual situation of the Company, the following assessment criteria for high-risk supply chain are specified:

(1) The mined silver originates from, has transited or has been transported via a conflict-affected or human rights abuse high-risk area.

(2) The mined silver is claimed to be originated from a country that has limited known reserves, likely resources or expected production levels of silver.

(3) The mined silver originates from places where conflict-affected and human rights abuse high-risk areas are known, or reasonably suspected, to transit.

(4) Silver-supplying counterparty or other known upstream companies are located in a country representing high-risk for money laundering, crime and corruption.

(5) Silver-supplying counterparty or other known upstream companies or their beneficial owners with significant influence over the Silver-supplying counterparty are PEPs.

(6) Silver-supplying counterparty or other known upstream companies are active in a higher-risk business activity such as arms, gaming and casino industry, antiques and art, sects and their leaders.

When any one of the above criteria exists, the supply chain is assessed as a high-risk supply chain. Members of the departmental compliance investigation team should prepare documents immediately and report them to the Compliance Manager, who will then report these materials to the Compliance Director, and the Compliance Director shall approve and take countermeasures to stop the transaction and eliminate risks.

### 5.3 评价标准 Evaluation criteria

a) 风险评价项目详见表《白银供应链尽职调查风险评价标准》(矿产原料类、再生原料类、客户类)。

a) Please refer to the Table Risk Assessment Criteria for Due Diligence Investigation of Silver Supply Chain (Mineral Raw Materials, Recycled Raw Materials and Customers) for details of risk assessment items.

b) 风险等级

b) Risk Level

矿产原料类：评分值(R)≥80分，低风险；

Mineral raw materials: score (R) ≥ 80 points, low risk;

40分≤R<80分，中风险；

40 points ≤R< 80 points, medium risk;

R<40分，高风险；

R< 40, high risk;

再生原料类：评分值(R)≥50分，低风险；

Recycled raw materials: score (R) ≥ 50 points, low risk;

30 ≤ R < 50 分，中风险；

30 ≤ R < 50 points, medium risk;

R < 30 分，高风险；

R < 30, high risk;

客户类：评分值(R) ≥ 50 分，低风险：

Customer category: score value (R) ≥ 50 points, low risk:

30 ≤ R < 50 分，中风险；

30 ≤ R < 50 points, medium risk;

R < 30 分，高风险；

R < 30, high risk;

#### 5.4 应对措施 Response measures

a) 低风险：继续交易，降低风险。

a) Low risk: continue to trade and reduce risk.

b) 中风险：暂停交易，直至降低为低风险。

b) Medium risk: Suspend trading until it is reduced to low risk.

与供应商沟通促进其指定和实施改善措施，在 6 个月之内确认风险符合本规定的要求后继续交易；如果供应商在 6 个月内拒不提供相关合法性证明文件和整改报告，那么公司应将其判定为高风险供应链，停止与其交易。具体要求如下：

Communicate with suppliers to promote them to designate and implement improvement measures, and continue trading after confirming that the risks meet the requirements of this regulation within 6 months; If the Supplier refuses to provide relevant legality certificates and rectification reports within 6 months, the Company shall determine it as a high-risk supply chain and stop trading with it. The specific requirements are as follows:

对于大规模开采的白银、手工及小型矿开采的白银、再生银：使用可信的独立来源的文件、数据和信息来核实情况，从矿山到精炼厂，供应链中每一家公司(包括白银生产商、贸易商、出口商和运输商)的收益所有人和政府监控名单信息都要求要核实。

For silver mined on a large scale, silver and recycled silver mined by manual and in small mines: Use credible independent source documents, data and information to verify the situation. From mines to refineries, the revenue owner and government monitoring list information of every company in the supply chain (including silver producers, traders, exporters and transporters) are required to be verified.

c) 高风险：停止交易，断绝风险，将其列入公司黑名单，3 年之内不能与公司交易。

c) High risk: stop trading, cut off risks, put them on the Company's blacklist and prohibit from trading with the company within 3 years.

## 6 白银供应链尽职调查培训

### 6 Due diligence training for silver supply chain

6.1 公司每年会对白银供应链中的员工进行该规定的培训，并将培训计划纳入年度培训计划当中。

The Company will carry out the specified training for employees in the silver

supply chain every year and incorporate the training plan into the annual training plan.

6.2 涉及白银供应链的员工必须参加，并通过培训签到的形式进行相关培训确认。

Employees involved in the silver supply chain must attend for relevant training confirmation through training sign-in.

6.3 采用讲解授课方式，并进行考核。

Adopt the method of explanation and teaching, and conduct assessment.

6.4 培训档案。培训后，需建立相应培训档案。记录保存至少 5 个会计年度。

After the training , the corresponding trainingfile is required. Record preservation saves at least 5 accounting years.

## 7 供应链追溯系统

### 7 Supply chain traceability system

7.1 建立供应链追溯系统，收集并维护每一精炼批次的供应链信息，包括为每一输入及输出分配一个单独参考编号：

Establish a supply chain traceability system to collect and maintain supply chain information for each refining batch, including assigning a separate reference number to each input and output:

a) 白银产品向上追溯（白银—原料）

a) Upward traceability of silver products (silver-raw material)

- 含银物料类型（矿产白银/再生白银）；

-Silver-containing material type (mineral silver/recycled silver);

- 入库重量和分析报告；

-Warehousing weight and analysis report;

- 原料入库日期和成品入库日期；

-Raw material storage date and finished product storage date;

b) 白银产品向下追溯（白银—顾客）

b) Downward traceability of silver products (silver-customer)

- 顾客信息；

-Customer information;

- 交易重量和分析报告；

-Transaction weight and analysis report;

- 出库日期；

-Outbound delivery date;

## 8 文件和记录的保留

### 8 Retention of Documents Records

8.1 按照 LBMA 要求保留充分的供应链文档记录，以证明已遵照适当及持续的尽职调查。

Maintain adequate supply chain documentation as required by LBMA to demonstrate compliance with appropriate and ongoing due diligence.

8.2 保留供应链追溯系统的记录。

Keep records of the supply chain traceability system.

8.3 记录保存 5 年。

Records shall be kept for 5 years.

## 9 白银供应链违规行为、事项上报程序

### 9 Reporting procedures for violations and events in silver supply chain

9.1 公司白银供应链相关工作人员如发现违规行为、事项，应及时向所在单位、分子公司合规专员进行书面或电话报告，合规专员向所在单位、分子公司分管领导进行报告，同时将发现的违规行为、事项及处理建议及时向公司合规专员报告，公司合规专员向公司白银供应链管理领导小组组长汇报。

If any violations or matters found, the relevant staff of the silver supply chain of the Company shall promptly report in writing or by telephone to the Compliance Officer of their organizations or constituent company. The Compliance Officer shall report to the leaders in charge of the organizations and the constituent company and shall also promptly report the found violations, matters and handling suggestions to the Compliance Officer of the Company. The Compliance Officer of the Company shall report to the leader of the Silver Supply Chain Management Leading Group of the Company.

9.2 发现存在有关白银提取、运输或贸易的系统性或广泛人权侵权行为，或者供应商向非法的非政府武装组织提供直接或间接支持，或者欺诈掩盖白银的原产地或者存在洗钱或恐怖主义融资等事项时，通报与该供应商解除合同关系，相关业务立即实施。

In case systematic or widespread human rights violations are found in relation to the extraction, transportation or trade of silver, or when suppliers provide direct or direct support to illegal non-governmental armed organizations, or fraudulently cover up the origin of silver or there are matters such as money laundering or terrorist financing, the relevant salesman shall notify the supplier of the termination of the contractual relationship.

9.3 发现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权行为，或者供应商向非法的非政府武装组织提供直接或间接支持，或者欺诈掩盖白银的原产地或者存在洗钱或恐怖主义融资等事项时，立即暂停交易，并对供应链客商进行专项调查，结合调查的结果来确定是否继续进行交易。

It is discovered that there may be systematic or widespread human rights violations relating to the extraction, transportation or trade of silver, or when suppliers provide direct or indirect support to illegal non-governmental armed organizations, or fraudulently cover up the origin of silver or there are matters such as money laundering or terrorist financing, the transaction shall be suspended immediately, and a special investigation shall be conducted on supply chain traders to determine whether to continue the transaction in combination with the results of the investigation.

## 10、白银供应链交易监督

### 10 Silver Supply Chain Transaction Monitoring

公司将对交易关联的过程贯穿始终的审查和监管，来确保交易时对供应链的

了解和风险预测一致。对交易的监管运用基于风险的方法来开展。

The company will review and supervise the process of transaction association throughout to ensure that the understanding of the supply chain and the risk prediction are consistent during the transaction. The supervision of transactions is carried out using a risk-based approach.

因此，公司对每一批收到的白银获取并记录以下信息：

Therefore, the company obtains and records the following information for each batch of Silver received:

#### （一）原生银

##### Mined Silver

1. 预估的重量和化验结果（来自供应方）。
- 1) Estimated weight and test results (from the supplier).
2. 航运/货运单据（运货/空运单、形式发票）。
- 2) Shipping/freight documents (shipping/air waybill, proforma invoice).
3. 高风险交易的进出口表格。
- 3) Import and export forms for high-risk transactions.
4. 每次付款记录对应合同记录凭证存档。
- 4) Archive the corresponding contract record voucher for each payment record.

#### （二）回收银

##### Recycled Silver

1. 预估重量（来自供应方）。
- 1) Estimated weight (from the supplier).
2. 航运/货运单据（运货/空运单、形式发票）。
- 2) Shipping/freight documents (shipping/air waybill, proforma invoice).
3. 回收银出现高风险交易情况，公司必须要求客户提供相应文件进行相互印证，核实文件是否真实相符，同时进行交易背景调查，情况不一致的需要通过调查并得出书面调查结果。
- 3) In case of high-risk transactions in recycled Silver, the company must require customers to provide corresponding documents for mutual verification, verify that the documents are true and consistent, and conduct a transaction background investigation. If the situation is inconsistent, it needs to pass an investigation and obtain a written investigation result.

每年各部门合规专员需向风控合规专员提交风险评估报告，由风控合规专员向高级管理层提交汇总后的风险评估报告。

Every year, the compliance specialists of each department need to submit a risk assessment report to the risk control compliance specialist, and the risk control compliance specialist submits a summary risk assessment report to the senior management.

公司高级管理层通过风险评估包括审批每一个评估为高风险的供应链，并每年重新决定是否继续与之保持商业关系。

The company's senior management has passed risk assessment, including approving each supply chain assessed as high risk, and re-deciding whether to continue to maintain a business relationship with it every year.

## 11 白银供应链第三方审核监督

### 11 Third party audit and supervision of silver supply chain

11.1 由指定认可的第三方审计机构开展年度第三方审核，确保持续改进。

An annual third-party audit shall be conducted by a designated and recognized third-party audit institution to ensure continuous improvement.

11.2 针对第三方审核机构在审核过程中提出的风险、问题，涉及白银供应链管理的部门、分子公司，需认真对照问题，制定改进措施、时限、责任人等。

In view of the risks and problems raised by the third-party audit institutions during the audit process, departments and constituent companies involved in silver supply chain management shall carefully compare the problems and formulate improvement measures, set time limits, assign responsible persons, etc.

## 12 问责

### 12 Accountability

12.1 公司各相关部门、分子公司涉及白银供应链的员工，没有按照本规定要求开展工作，造成不良后果的，根据情节严重情况，依据公司相关问责管理规定进行处理。

If employees of relevant departments and constituent companies of the Company involved in the silver supply chain fail to carry out their work in accordance with the requirements of this Regulation, resulting in adverse consequences, they shall be dealt with according to the relevant accountability management regulations of the Company based on the serious circumstances.

## 13 白银供应链违规上报通讯机制

### 13 Silver Supply Chain Violation Reporting Communication Mechanism

所有公司内部白银供应链相关工作人员如发现违规事项，应及时向所属板块合规专员进行邮件及电话报告，再由合规专员向合规风控官进行邮件及电话报告。由合规风控官负责处理，在3个工作日内采取直接面谈的方式与员工答复，整个申诉过程中保护员工隐私，对举报人信息保密，杜绝任何行为的打击报复。All staff related to the company's internal Gold, Silver supply chain should report to the compliance officer of the sector by email and phone in a manner if they find any violations, and then the compliance officer will report to the compliance risk control officer by email and phone. The compliance and risk control officer is responsible for handling the , and responds to employees is protected during the entire appeal process, the information of informants is kept confidential, and any acts of retaliation are eliminated.

请各供应商严格遵守本公司黄金、白银供应链管理制度，请社会各界及公司全体员工监督，对违规操作进行举报。

Suppliers are requested to strictly abide by the company's Gold, Silver supply



chain management system, and all the employees of the society and the company are required to supervise and report illegal operations.

申诉者应填写附件一所示《供应链尽责管理申诉书》，语种不限。申诉书应通过电子邮件或邮寄至公司白银负责任供应链工作组。

The complainant is required to complete the Supply Chain Responsible Management Appeal Form, as shown in Appendix I, in any language. The complaint should be submitted via email or mail to the Company's Silver Responsible Supply Chain Working Group.

邮箱: [yuguang301@126.com](mailto:yuguang301@126.com)

EMAIL: [yuguang301@126.com](mailto:yuguang301@126.com)

地址: 河南省济源市荆梁南街 1 号豫光金铅集团公司 301 室-供应链尽责管理工作组

Address: Room 301 - Supply Chain Responsible Management Working Group, Yuguang Gold and Lead Group Co., LTD., No. 1 Jingliang South Street, Jiyuan City, Henan Province

  
河南豫光金铅股份有限公司  
Henan Yuguang Gold and Lead Co., Ltd  
2023 年 4 月 17 日  
Date: 2023-04-17

附件一：

供应链尽责管理申诉书

申诉者名称（可匿名）		是否要求保密	
联系电话		电子邮箱	
是否为受委托的第三方		如是，受何人或何团体委托（同时附受委托证明）	
冲突回避	（如需要回避公司供应链尽责管理委员会、尽责管理工作组的特定人员，请列出其姓名）		
所遭受（或可能遭受）负面影响的事实和证据，以及其他任何能够支持申诉的信息（可附页，并附申诉证据）：			
您的诉求，以及实现诉求所希望采用的解决方案（明确且可操作的诉求能够帮助我们更快的帮您解决问题）			
申诉者代表签名：			
申诉日期：			