

# 广东金业贵金属有限公司

## 白银供应链尽职调查政策

Guangdong Jinye Precious Metals Co., Ltd.  
Silver Supply Chain Due Diligence Policy

广东金业贵金属有限公司严格遵守国家关于职工权利、环境保护等各项法律法规，积极参与配合 LBMA 供应链调查工作，为全面实施《OECD 关于在冲突地区及高危地区供应链尽职调查指导方针》以及《LBMA 负责的白银指南》，我公司现已推行尽责管理体系。

Guangdong Jinye Precious Metals Co., Ltd. strictly abides by national laws and regulations on employee rights, environmental protection, etc., actively participates in the supply chain investigation work with LBMA, and for the full implementation of OECD Guidelines on Due Diligence Investigation of Supply Chains in Conflict and High Risk Areas as well as the LBMA Responsible Silver Guidance, the company has implemented the Due Diligence Management System.

为配合我公司 LBMA 负责体系的顺利执行，各供应商应遵守管理体系的各项要求，并承诺向我公司提供的所有类别产品的采购均为合法，严格遵守 OECD（附录二）、LBMA 制定的供应链尽责管理要求的相关内容。我们做出承诺不涉及以下情况：

In order to cooperate with the smooth implementation of our LBMA responsible system, each supplier shall comply with the requirements of the management system and promise that the procurement of all categories of products supplied to our company is legal, and strictly comply with the relevant contents of the supply chain due diligence management requirements formulated by OECD (Appendix II) and LBMA. We make a commitment not to involve the following:

1. 侵犯人权，强制劳役、童工、残酷，非人道和羞辱虐待，实施严重侵权或侵犯人权行为的任何一种方式采购或与该方有关联；

1. Violation of human rights, forced labor, child labor, cruel,

inhuman and degrading abuse, commission of serious abuses or violations of human rights in any of the ways procured or associated with the party;

2. 战争犯罪，违反国际人权法，人权犯罪或种族屠杀；

2. War crimes, violations of international human rights law, human rights crimes or genocide;

3. 洗钱、恐怖主义融资或资助冲突的直接或间接的任何一种方式采购或与该方有关联；

3. Any purchase or association with a party that directly or indirectly engages in money laundering, terrorist financing or the financing of conflict;

4. 向非法武装组织、公共或私人安全部队提供直接或间接的任何一种方式采购或与该方有关联；

4. Procurement or association with illegal armed groups, public or private security forces, directly or indirectly in any way;

5. 贿赂或欺诈白银真实来源直接或间接任何一种方式采购或与该方有关联；

5. Bribery or Fraud Silver True Source directly or indirectly any of the ways to procure or be associated with the party;

6. 不遵守有关就源自受冲突影响和高风险地区（“CAHRA”）的矿产开采、贸易和出口应付政府的税收、费用和使用费的或社会信用评价低的直接或间接与该方有关联；

6. Non-compliance with taxes, fees and royalties payable to governments for the extraction, trade and export of minerals originating from conflict-affected and high-risk areas ( “CAHRA ” ) or having a low social credit rating, directly or indirectly associated with such party;

7. 不符合环境和可持续性法律要求，开采白银源于世界遗产或生态保护区域的直接或间接与该方有关联；违反环境、健康、安全、劳工和与社区有关的地方立法，触发 ESG 风险，极有可能导致不利影响或间接与该方有关联，并支持实施相关倡议（如采掘业透明度倡议(EITI)）。

7. Non-compliance with environmental and sustainability legal requirements, direct or indirect association with the party where the

mining of silver originates from a World Heritage Site or an ecologically protected area; violation of environmental, health, safety, labour and community-related local legislation, triggering an ESG risk with a high likelihood of adverse impacts or indirect association with the party, and support for the implementation of relevant initiatives (e.g. Extractive Industries Transparency Initiative (EITI)).

我公司认可的合格供应商提供的必须符合管理体系的各项要求,公司的相关对接单位须认真核实供应商信息,建立供应商信息管理档案,并不定期考察评估供应商风险。

The information provided by the qualified suppliers recognized by our company must meet the requirements of the management system. The company's related docking units must carefully verify the information of the supplier, establish the supplier information management file, and irregularly examine the risk of suppliers.

公司愿意接受客户和相关组织的监督,确保企业尊重人权,为可持续、公平、有效的发展做出贡献,为企业与相关方开展建设性合作创造良好条件。

The company is willing to accept supervision from customers and relevant organizations to ensure that the company respects human rights, contributes to sustainable, fair and effective development, and creates good conditions for the company to carry out constructive cooperation with relevant parties.

根据《LBMA 负责任的白银指南》,对与广东金业贵金属有限公司有交易、加工的所有供应商、相关合作伙伴进行以下风险等级分值设定(见附件1)。

According to the "LBMA Responsible Silver Guidance", the following risk level scores are set for all suppliers and relevant partners that have transactions and processing with Guangdong Jinye Precious Metals Co., Ltd. (See Attachment 1).

根据风险分值,对与广东金业贵金属有限公司有交易、加工的所有供应商、相关合作伙伴达到以下分值,分别采取不同的风险终止办法(见附件1)。

According to the risk score, different risk termination methods will

be adopted for all suppliers and relevant partners who have dealings and processing with Guangdong Jinye Precious Metals Co., Ltd. to reach the following scores (see Annex 1).

请各供应商自觉遵守以上制度，并与我公司签订《承诺书》（见附件2）。

Suppliers are requested to consciously abide by the above system and sign a Letter of Commitment with our company (see Annex 2).

本管理政策自发布之日起实施，公司原有相关规定与本规定有冲突的，一律按本政策执行。

From the date of implementation of this management policy, the company's original relevant regulations have conflicted with these regulations, and they will be implemented in accordance with this policy.



A handwritten signature in black ink, consisting of stylized Chinese characters, positioned below the official seal.

### 风险分级

序号	风险等级	风险值 (R)	控制要求
1	低风险	$R \geq 6$	继续交易减少风险
2	中风险	$2 < R < 6$	减少交易风险
3	高风险	$\leq 2$	停止交易摆脱风险
4	零容忍	任意一条	完全禁止交易

### Risk classification

Serial number	Risk level	Risk value (R)	Control requirements
1	Low risk	$R \geq 6$	Continue trading to reduce risk
2	Medium risk	$2 < R < 6$	Suspend trading to reduce risk
4	high risk	$\leq 2$	Stop trading and get rid of risk
5	zero tolerance	Any one	Totally forbid trading

### 风险等级分值 Risk level score

序号 Number	评估方 Evaluation Party	评估内容 Evaluation Content	分值 Score
1	商业交易方 (含银行) Commercial transaction party (including	1.1 相关营业执照等 Relevant business license, etc.	6分
		1.2 相关受益人 Related beneficiaries	2分
		1.3 受益人身份文件 Beneficiary identity documents	2分
		1.4 相关商业关系 Related business relationships	2分
		1.5 财务状况 Financial condition	2分

	banks)	1.6 原料的源产地资料信息等 Information on the source and place of origin of raw materials, etc.	6分
2	矿场方	2.1 证明合理和善意之努力识别原料产地来源 Proving reasonable and good faith efforts to identify the origin of raw materials	6分
		2.2 采矿许可证 Mining license	3分
		2.3 进出口许可证 Import/Export Silver License	5分
		2.4 采矿情况信息 Mining situation information	2分
		2.5 开采能力的信息 Data on mining capacity	2分
3	回收金 (含自然人)	3.1 再生原料供应商资质信息 Qualification information of recycled raw material suppliers (including natural persons)	6分
		3.2 再生原料供应商商业关系 Business relationship of recycled raw material suppliers	2分
		3.3 再生原料供应商白银来源证明 Proof of Silver Source from Recycled Raw Material Suppliers	4分
		3.4 再生原料供应商相关受益人背景情况描述等 Description of background information of beneficiaries related to recycled raw material suppliers, etc.	4分
		3.5 再生原料供应商相关受益人身份文件 Identification documents of beneficiaries related to recycled raw material suppliers	4分
4	零容忍项目	4.1 原料来自被指定为世界遗产或保护区的地区 Raw materials from areas designated as World Heritage or protected areas	
		4.2 原料来自国际制裁地区 Raw materials from internationally sanctioned regions	
		4.3 有侵犯人权、强制劳役、童工、残酷，非人道和虐待 Violations of human rights, forced labor, child labor,	

		cruelty, inhumanity, and abuse	
		4.4 战争犯罪，违反国际人权法，人权犯罪或种族屠杀 War crimes, violations of international human rights law, human rights crimes, or genocide	
		4.5 洗钱或来自高风险、冲突地区 Money laundering or from high-risk, conflict prone areas	
		4.6 对非政府武装集团直接或间接支持，购买贵金属 或提供协助 Directly or indirectly supporting non-governmental armed groups, purchasing precious metals or providing assistance	
		4.7 造成灾难性伤害或高度不利的 ESG 因素 Causing catastrophic harm or highly unfavorable ESG factors	

附件 2：承诺书

Attachment 2: State of commitment

**承 诺 书**

**Statement of commitment**

广东金业贵金属有限公司：

Guangdong Jinye Precious Metals Co., Ltd.

本公司已经收到贵公司发送的符合 LBMA 负责任白银采购政策，我司将严格遵守 LBMA 要求，积极配合完成各项调查工作。我谨代表本公司向贵司承诺：

We have received a copy of the LBMA's Responsible Silver Sourcing Policy from you, and we will comply with the LBMA's requirements and cooperate actively in completing the survey. On behalf of the Company, I would like to make a commitment to your company:

本公司愿意主动承担社会责任，积极回馈社会，保证企业员工的健康和安

全，为贵公司提供的所有矿石产品均为合法所得（采购贵公司的白银产品均用于合法用途），不涉及以下情况：

Our company is willing to take the initiative to assume social responsibility, actively contribute to the society, ensure the health and safety of the enterprise staff, and provide your company with all the ore products are legally obtained (purchasing your company's silver products are used for legal purposes), and not involved in the following situations:

1. 人权侵权行为，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. Human rights violations, including child labor, torture, inhuman and degrading treatment, widespread use of violence or other serious human rights violations such as forced labor, 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. Providing direct or indirect support to illegal armed organizations or to public or private security forces that illegally control mines, traders, other intermediaries, transportation routes through the supply chain, or illegally taxing or extorting money or minerals throughout the supply chain (“illegal armed organizations, public or private security forces”);

3. 通过贿赂或欺诈掩盖白银原产地；

3. Concealing the origin of silver through bribery or fraud;

4. 未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. Failure to comply with Government requirements regarding extraction, trade and export taxes and fees for minerals 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. Funding 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 business operations, such as weapons, gambling, antiques and 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 a wanted person;

9. 不遵守 ESG 因素, 健康、安全和劳动法规等公司政策;

9. Non-compliance with company policies such as ESG factors, health, safety and labor regulations;

10. 不遵守 LBMA 2.0 白银供应链尽职调查管理体系及经合组织附件二政策。

10. non-compliance with the LBMA Responsible Silver Guidance 2<sup>nd</sup> edition and the OECD Annex II Policy.

公司名字 Company Name:: \_\_\_\_\_

地址 Address: \_\_\_\_\_

授权签字人/职位 Authorized signatory/position: \_\_\_\_\_

电话/电子邮箱 Phone number/e-mail address: \_\_\_\_\_

盖章 Affix a seal: \_\_\_\_\_