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**Silver Supply Chain Due Diligence
Rules**

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白银供应链尽职调查规则适用范围

Scope of Application for Silver Supply Chain Due Diligence Rules

一、适用范围

I. Scope of application

本白银供应链尽职调查规则，适用于广东金业贵金属有限公司、以及与广东金业贵金属有限公司有白银交易、白银加工的所有白银供应商、白银相关合作伙伴。（包括白银生产商、中间商、白银交易商、出口商和运输商。）

These Due Diligence Rules of Silver Supply Chain are applicable to Guangdong Jinye Precious Metals Co., Ltd. and all silver suppliers and silver related partners of silver trading and silver processing with Guangdong Jinye Precious Metals Co., Ltd. (including silver producers, resellers, silver dealers, exporters, and carriers.)

白银供应链公司内部组织架构及责任

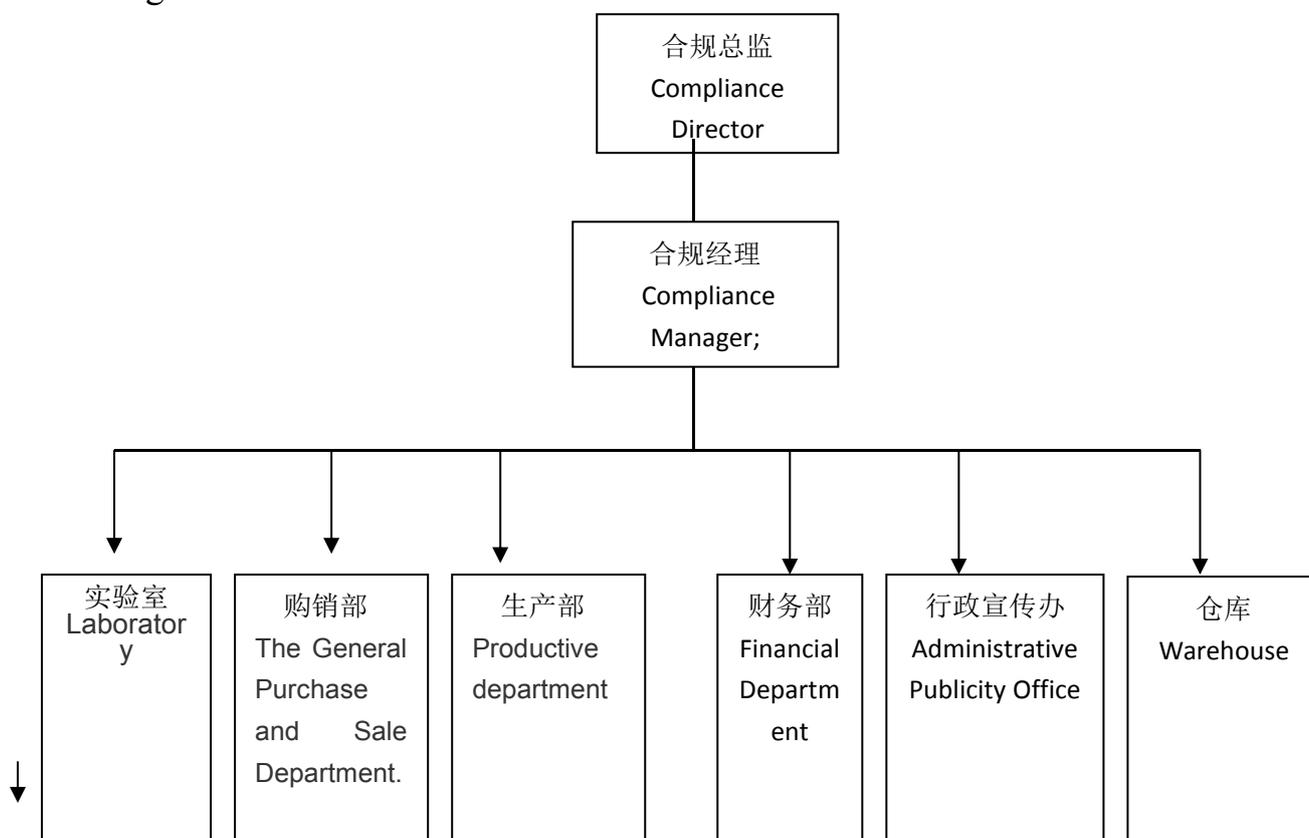
Internal Organizational Structure and Responsibilities of Silver Supply Chain Company

一、白银供应链公司内部组织架构

I. Internal organizational structure of silver supply chain company

广东金业贵金属有限公司为白银供应链尽职调查设立了专门的组织，组织结构如下：

Guangdong Jinye Precious Metals Co., Ltd. has established a special organization for due diligence on the silver supply chain, and the organization structure is as follows:



二、白银供应链公司内部组织责任

II. Internal organizational responsibilities of silver supply chain company

1、合规总监

1. Compliance Director

合规总监对白银供应链上的所有事项负责，负责监督供应链所有事项；对政策每年进行审查,有必要时及时更新。根据 LBMA 负责任的白银指南文件，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，并半年组织培训重温相关内容。

The Compliance Director is responsible for everything in the silver supply chain. The policy is reviewed annually and updated as necessary. According to the LBMA Silver responsible Guidance, the relevant staff will be trained to make the relevant responsible person clearly understand the purpose and significance of this system, understand their responsibilities in the implementation of the due diligence policy, and organize the training to review the relevant contents half a year.

2. 合规经理

2. Compliance Manager

(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。

(1) The Compliance Risk Control Officer shall have the authority to monitor the due diligence on the silver supply chain and assess whether the due diligence has been adequately conducted; the Compliance Risk Control Officer shall have the right to request additional documents or information if deemed necessary.

(2) 如果存在高风险供应链或交易，需要及时向集团分管副总汇报。

(2) If there is a high-risk supply chain or transaction, the Compliance Risk Control Officer shall report to the Vice President of the Group promptly.

(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。

(3) Conduct regular training on rules of the silver supply chain for employees. Draft and update the rules of the silver supply chain to provide accurate information for senior management for compliance.

(4) 负责起草内部的 LBMA 合规报告。

(4) Be responsible for drafting internal LBMA compliance report.

3、合规专员

3. Compliance Officer

合规专员负责收集与保存足够的现货供应链的证明文件，如供应商营业执照、采矿许可证、身份证复印件，白银采购合同、供应商社会责任承诺书等。

The Compliance Officer is responsible for collecting and keeping

sufficient documentary evidence of the spot goods supply chain including the business license of the supplier, mining license, copy of ID card, silver procurement contract, social responsibility commitment of the supplier, etc.

(1) 每年至少一次对重要现货客户（年供应量达到 1000kg）进行现场调查；

(1) The crucial spot goods customers (with the annual supply reaching 1000kg) should be provided with the field investigation at least once a year;

(2) 协助与鼓励现货白银供应商承诺且书面确认遵守白银供应链尽职规则；

(2) It is needed to assist and encourage the spot silver supplier to promise and confirm to comply with the due diligence regulations of the silver supply chain in written form;

(3) 如出现异常情况需及时向合规风控官报告。

(3) It is needed to report to the Compliance Risk Control Officer in time if there are any abnormal conditions.

4、进出口部合规专员

4. Compliance Officer of Import and Export Department

进出口部合规专员负责收集与保存足够的进出口供应链的证明文件，如供应商营业执照、采矿许可证、身份证复印件，白银采购合同、供应商社会责任承诺书等。

The Compliance Officer of the Import and Export Department is responsible for collecting and keeping sufficient documentary evidence of import and export supply chain including the business license of the supplier, mining license, copy of ID card, silver procurement contract, social responsibility commitment of the supplier, etc.

(1) 每年至少一次对进出口重要客户（年供应量达到 1000kg）进行现场调查；

(1) The crucial import and export customers (with the annual supply reaching 1000kg) should be provided with the field investigation at least once a year;

(2) 协助与鼓励进出口白银供应商承诺且书面确认遵守白银供应链尽职规则；

(2) It is needed to assist and encourage the silver import and export supplier to promise and confirm to comply with the due diligence regulations of the silver supply chain in written form;

(3) 如出现异常情况需及时向合规风控官报告。

(3) It is needed to report to the Compliance Risk Control Officer in time if there are any abnormal conditions.

5、财务部合规专员

5. Compliance Officer of Financial 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。

The Compliance Officer of the Financial Department is responsible

for keeping completed transaction vouchers of all customers.

(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；

(1) The transaction vouchers include but are not limited to: warehousing lists, relevant customer certificates for legal qualification, etc. The records shall be kept for at least five fiscal years.

(2) 如出现异常情况需及时向合规风控官报告。

(2) It is needed to report to the Compliance Risk Control Officer in time if there are any abnormal conditions.

6、物流合规专员

6. Logistics Compliance Officer

物流合规专员其职责为选择符合白银运输资质要求的运输公司、保险公司。

The Logistics Compliance Officer is responsible for selecting the transport companies and insurance companies under the qualification requirements for silver transportation.

(1) 按要求保存每一运单、保单，并跟踪运单情况，确定运输公司或保险公司运输路线；

(1) Each waybill and insurance policy shall be kept as required and it is needed to track the waybills to ensure transport route of transport companies or insurance companies;

(2) 如出现异常情况需及时向合规风控官报告。

(2) It is needed to report to the Compliance Risk Control Officer in time if there are any abnormal conditions.

7、金业合规专员

7. Gold Industry Compliance Officer

金业合规专员其职责为定期根据合规审核流程。

The Gold Industry Compliance Officer is responsible for reviewing the process as per the compliance regularly.

(1) 收集、整理 LBMA 相关数据，完成日常合规报告；

(1) Collect and clear up the relevant data of LBMA to complete the daily compliance report;

(2) 不定时上报员工对白银供应链或者任何新确认的风险的建议和意见，并提出自己的意见。

(2) Report the ideas and suggestions of the staff for the silver supply chain or any newly-confirmed risks irregularly, and put forward the own idea.

三、识别及评估供应链风险

三. Recognize and evaluate the risk of supply chain

1.开展供应链尽职调查，识别潜在风险

1.Carry out the supply chain to investigate and identify potential risks

遵循基于评估风险的方法进行供应链尽职调查，在与白银供应商相对方建立新的业务关系之前及保持关系期间，必须进行尽职调查。

Investigate the supply chain based on the method of evaluating risks, before the establishment of a new business relationship with Silver

suppliers and during the maintenance relationship, due to the establishment of a new business relationship, due diligence must be conducted.

公司实施白银供应链尽职调查，遵循以下原则：

The company implemented the Silver supply chain to investigate and follow the following principles:

(1)全面性原则：尽职调查应涵盖公司白银供应链相关的各种业务和事项。

(1) Principles of comprehensiveness: Due diligence investigations should cover various businesses and matters related to the company's Silver supply chain.

(2)重要性原则：尽职调查工作应当在全面性的基础上，重点关注冲突地区、世界遗产地、自然保护区。

(2) Principles of importance: Due to due diligence, on the basis of comprehensiveness, focus on conflict areas, world heritage, and nature reserves.

(3)客观性原则：尽职调查结果应当准确、如实地揭示供应链中的风险状况。

(3) Principles of objectivity: The results of due diligence should be accurately and truthfully reveal the risk status in the supply chain.

2. 尽职调查分别从位置(包括来源及途径)、供应相对方、原料三个维度进行。具体识别方式可参考以下内容：

2、Due diligence investigations are carried out from the three dimensions of positions (including sources and channels), supply of counterparties, and raw materials. The specific identification method can be referred to the

following:

2.1 位置风险识别应包括但不限于:

2.1 Location risk recognition should include, but not limited to:

1)确定白银的来源,真实记录来源分类:矿产银、再生银、采矿副产品、官方库存;

1)Determine the source of Gold,Silver,and the true recording source classification:mineral Silver,regeneration Silver,mining by -products,official inventory;

2)确定白银的来源地或途径地,参考中国政府认可的国际制裁名单、多德-弗兰克法案第 1502 条、欧盟 CAHRA 名单、海德堡晴雨表、脆弱国家指数或类似的指数、联合国人权事务高级专员办事处或同等机构、金融行动特别工作组(FATF)的报告(包括相关国家/地区报告)、关于高风险白银中心/转运中心和高洗钱风险国家/地区的可靠市场情报。

2)Determine the source of the Silver or place,refer to the international sanctions list recognized by the Chinese government,Article 1502 of the Dodd -Frank Act, the European Union CAHRA list, Heidelberg Yuru, fragile national index or similar index , UN High Commissioner of Human Rights Affairs Senior Commissioner Reports by offices or equivalent institutions and financial operations (FATF)(including related countries/regions reports),and reliable market information about high -risk Silver centers/transshipment centers and high money laundering countries/regions.

2.2 使用工具包中的 KYC 调查问卷对供应商进行风险识别,包括但不限于:使用可靠、独立来源的文件、数据或信息,识别和核实白银供

应对手方的名称、实际地址、公司注册和许可证信息;

2.2 Use the KYC survey questionnaire in the tool package to perform risk recognition to the supplier,including but not limited to: use reliable and independent sources of documents, data or information, identify and verify the name, actual address, company registration and license of the company information;

使用可靠的带照片的身份证明文件,识别和验证最终受益人及相关相对方信息;Use a reliable identification document with a photo,identify and verify the final beneficiary and related counterpart information;

确认白银交易相对方及其最终受益人未被列入任何政府通缉的洗钱者名单或已知的诈骗犯或恐怖分子名单;

Confirm that the counterpart of the Silver transaction and its ultimate beneficiaries have not been included in the list of money launder or known scammer or terrorist list;

了解供应商的业务和财务信息, 预判有关业务关系的目的。

Understand the supplier's business and financial information, and predict the purpose of related business relations.

3.基于风险状况对供应链进行分类

3.Classified the supply chain based on risk conditions

公司将供应链分为零容忍金银供应链、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 gold and Silver supply chain, high -risk supply chain, mid -risk supply chain, and low -risk supply chain.

3.1 零容忍供应链的评判标准

3.1 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者是已知的洗钱者、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 tinned Silver, or it must immediately terminate the existing relationship.

四：高风险白银供应链评判标准

IV. Judgment Criteria of High-risk Silver Supply Chain

(一) 高风险黄金、白银供应链注意事项

Precautions for high -risk Silver 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) Human rights infringement, including the use of children's workers, torture, non-humanity, and insulting personality treatment, extensive use of violence or other serious anti-human rights forced labor, war, anti-human crime, or racial extinction;

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) Provide direct or indirect support to illegal armed organizations or illegally controlling mining areas, dealers, other intermediary agencies, and transportation routes through the supply chain, or illegally taxes or extract money or mining in the entire supply chain or illegally taxation in the supply chain. Products(“illegal armed organization, public or private security forces”);

3. 贿赂而来或者是掩盖白银真实来源；

(3) Come bribe or cover the true source of Silver;

4.违反政府税收、费用政策，或社会信用评价低的直接或间接与该方有关联;(我们将确保向政府支付所有与受冲突影响和高风险区域矿石开采、贸易、出口相关的合法税收、费用和特许费，并且承诺根据企业在供应链上所处位置依照《采掘行业透明度行动计划》(EITI)中的各项原则对此类支付进行披露)。

(4) Violation of government tax, expenses, or the direct or indirect of social credit evaluation are related to the party; (we will ensure that all legal taxes related to the mining, trade, and export -related ore mining, trade, and exports related to the government will be ensured The cost and franchise fee, and promised to disclose such payments according to the principles of the Entering Industry Transparency Action Plan (EITI) in accordance with the position of the enterprise on the supply chain).

5.洗钱和恐怖主义融资;

(5) Money laundering and terrorism financing;

6.加剧冲突;(6) Anestly conflict;

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) Entering high -risk operations, such as weapons, gambling, antiques and artworks, 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 political sensitive person or a wanted person;

（二）白银供应链高风险类别标准

High-risk Category Standards for Silver Supply Chain

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：

According to the relevant regulations of LBMA and OECD, and in combination with the actual situation of the Company, the following high-risk supply chain evaluation criteria are specially stipulated:

（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。

(1) Raw material silver originates from, transits or transports through areas affected by conflicts or at high risk of human rights violations

（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。

(2) The raw material silver claims to come from a country with limited known reserves, limited resources or limited expected silver production.

（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。

(3) The raw material silver comes from a known high-risk area of conflict impact and human rights violations, or has been transited through this area with sufficient reason.

（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。

(4) Companies in the silver supply chain or other known upstream

companies are located in a country with high risks of money laundering, crime and corruption.

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

(5) The income owners of companies in the silver supply chain or other known upstream companies are politically sensitive.

(6) 在白银供应链中的公司或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。

(6) Companies in the silver supply chain or other known upstream companies are actively involved in high-risk commercial activities, such as weapons, gambling, games, antiques and works of art, diamonds, religion and religious leaders.

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，相关合规人员将对所在高风险地区进行 2 次的实地考察及由外部第三方评估人员进行所有各方面进行相关评估后，部门合规小组成员应准备相关尽职调查材料上报合规专员，由合规专员上报合规总监，由合规总监批准采取应对措施，停止交易，消除风险。

When any of the above evaluation criteria objectively exists, the supply chain will be judged as a high-risk supply chain. After the relevant compliance personnel will conduct two field visits to the high-risk area and the external third-party assessors will conduct all aspects of the

relevant assessment, the department compliance team members should prepare relevant due diligence materials and report them to the compliance specialist, who will report them to the Compliance director, The Compliance director shall approve and take countermeasures to stop trading and eliminate risks.

(三)白银供应链公司内部评估等级

(三)Internal Assessment Level of Silver Supply Chain Company

3.1 供应商信息收集，供应商签订合作协议前，业务部门根据含银物料的种类不同(矿产银或再生银)，分别根据 LBMA 工具包中的调查表内容对供应商进行访谈识别，所要以下相关资料。

3.1Supplier information collection:Before signing a cooperation agreement, the business department will conduct interviews and identification of suppliers based on the types of Silver containing materials(mineral Silver or recycled gold Silver) according to the questionnaire content in the LBMA toolkit. The following relevant information is required.

风险分级

序号	风险等级	风险值 (R)	控制要求
1	(i)低风险	$R \geq 6$ 分	继续交易减少风险
2	(ii)中风险	$2 \text{ 分} < R < 6 \text{ 分}$	暂停交易减少风险
3	(iii)高风险	$R \leq 2$ 分	停止交易摆脱风险

Risk classification

Serial number	Risk level	风险值 (R)	Control requirements
1	Low risk	$R \geq 6$ points	Continue trading to reduce risk
2	Medium risk	$2 \text{ points} < R < 6 \text{ points}$	Suspend trading to reduce risk
3	high risk	$R \leq 2$ points	Stop trading and get rid of risk

风险等级分值

序号	评估方	评估内容	分值
1	商业交易方 (含银行)	1.1 相关营业执照等	6分
		1.2 相关受益人	2分
		1.3 受益人身份文件	2分
		1.4 相关商业关系	2分
		1.5 财务状况	2分
		1.6 原料的源产地资料信息等	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	6分
		2.2 采矿许可证	3分
		2.3 进/出口黄金、白银许可证	5分
		2.4 采矿情况信息	2分
		2.5 开采能力的的数据	2分
3	回收金 (含自然人)	3.1 再生原料供应商资质信息	6分
		3.2 再生原料供应商商业关系	2分
		3.3 再生原料供应商黄金、白银来源证明	4分
		3.4 再生原料供应商相关受益人背景情况描述等	4分
		3.4 再生原料供应商相关受益人身份文件	4分

Risk level score

Serial Number	Assessor	evaluation content	Score
1	Commercial transaction party (including banks)	i. Relevant business licenses, etc	6 points
		ii. Related beneficiaries	2 points
		iii. Identification documents of beneficiaries	2 points
		iv. Related business relationships	2 points
		v. Financial situation	2 points
		vi. Information on the origin of raw materials, etc	6 points
2	Mine side	i. Reasonable and goodwill efforts to identify the origin of raw materials	6 points
		ii. mining license	3 points
		iii. Import/Export Gold, Silver License	5 points
		iv. Mining situation information	2 points
		v. Data on mining capacity	2 points
3	Recovery funds (including natural persons)	i. Qualification information of renewable raw material suppliers	6 points
		ii. Business relationship with recycled raw material suppliers	2 points
		iii. Certificate of Gold, Silver Source from Renewable Raw Material Supplier	4 points
		iv. Background description of beneficiaries related to recycled raw material suppliers, etc	4 points
		iv. Identification documents of beneficiaries related to recycled raw material suppliers	4 points

3.2 白银供应链风险评价标准

3.2 Silver Supply Chain Risk Evaluation Standard

3.2.1 直接评定为高风险标准

3.2.1 Directly rated as high-risk standard

a)矿产白银(含银精矿)或再生银的源头、白银销售区域经过或途经冲突影响地区或人权侵犯高风险地区。

a) The source of mineral Silver (including Silver concentrate) or recycled Silver, the sales area of Silver passing through or passing through conflict affected areas or high-risk areas for human rights violations.

b)矿产白银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。

b) The mineral Silver comes from a country with known limited reserves, limited resources, or expected limited Silver production.

c)再生白银来自于已知白银销售至众所周知或被怀疑其白银来自于或途经冲突影响地区和人权侵犯高风险地区。

c) Regenerated Silver comes from known, sold to well-known or suspected sources in conflict affected areas and high-risk areas for human rights violations.

d)白银供应交易方其他已知上游公司白银销售客户位于高洗钱风险的国家。

d) Other known upstream companies and Silver sales customers of the Silver supply trading party are located in countries with high money

laundering risk.

e)供应方、其已知上游公司、白银销售客户中对其有重要影响的权益所有者是政治敏感人物。

e)The equity owners who have significant influence on the supplier,its known upstream companies, and Silver sales customers are politically sensitive individuals.

f)供应商、其已知的上游公司、白银销售客户从事于高风险业务，如武器、博彩业、古董和艺术品、教派和其领导人。

f) Suppliers,their known upstream companies,and Silver sales clients are engaged in high-risk businesses such as weapons, gambling, antiques and artworks, sects,and their leaders.

g)来自、途经的高风险国家和地区，包括 CFSP 公布的冲突战乱国家和地区、被联合国制裁的国家或地区、FATF 公布的洗钱高风险国家和地区。

g)High-risk countries and regions from and through,including countries and regions with conflict and conflict declared by CFSP , countries or regions sanctioned by the United Nations,and countries and regions with high risk of money laundering declared by FATF.

3.2.2 评价方法:以尽职调查表内容为基础，结合实际收到供应商、客户的对应的资料情况，以各项目的评价标准进行评价打分，最终确定风险等级。

3.2.2 Evaluation method: Based on the content of the due diligence

questionnaire, combined with the actual receipt of the corresponding information from suppliers and customers, evaluate and score according to the evaluation criteria of each item, and finally determine the risk level.

3.2.3 评价标准

3.2.3 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)。

a) The risk assessment items are detailed in the table "Due Diligence Risk Assessment Standards for Silver Supply Chain" (mineral raw materials, renewable raw materials).

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 value (R) ≥ 80 points, low risk;

40 分 $\leq R < 80$ 分, 中风险;

40 points $\leq R < 80$ points, medium risk;

R < 40 分, 高风险;

R < 40 points, high risk;

再生原料类: 评分值(R) ≥ 50 分, 低风险;

Renewable raw materials: score value (R) ≥ 50 points, low risk:

30 $\leq R < 50$ 分, 中风险;

30 $\leq R < 50$ points, medium risk;

R<30 分，高风险;

R<30points,high risk;

3.2.4 应对措施

3.2.4 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 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 the supplier to promote its designation and implementation of improvement measures,and continue trading after confirming that the risk meets the requirements of this regulation within 6 months; if the supplier refuses to provide I relevant legality certification documents and rectification reports within 6 months, then The company should judge it as a high-risk supply chain and stop trading with it.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 large-scale Silver mining, artisanal and small-scale mining Silver, and recycled Silver: use documents, data and information from credible independent sources to verify the situation, from mines to refineries, every company in the supply chain (including Silver production Merchants, traders, exporters and transporters) income owners and government monitoring list information 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 the risk, put it on the company's blacklist, and cannot trade with the company within 3 years.

五. 白银供应链尽职调查规定

V. Silver Supply Chain Due Diligence Regulations

(一)、白银供应链尽职调查措施

I. Due diligence measures of silver supply chain

公司内部对所有白银交易、白银加工的所有白银供应商、白银相关合作伙伴建立相应的白银供应链尽职调查措施, 并在交易时明确告知。白银供应链尽职调查措施主要包含:

Within the Company, corresponding due diligence measures of silver supply chain specific to all silver suppliers and relevant cooperative silver partners involved in all silver transactions and processes shall be

established and explicitly informed during transactions. The due diligence measures of the silver supply chain mainly include:

1、建立供应链客户档案。包括：名称、法定代表人、地址、联系方式、运营方式、交易合同等。

1. It is important to establish customer archives of the supply chain, including: names, legal representatives, addresses, contact information, operation ways, business contracts, etc.

2、对既有供应链客户需定期进行核查，如有新建及变更的客户，需及时对其进行档案资料核查，并更新档案资料库。

2. The existing supply chain customers are required to be verified regularly. If there are any newly-added or changed customers, it is needed to verify archival data timely and update the archive database;

3、确定供应链的每一客户不在任何政府的洗钱、诈骗或恐怖主义通缉名单上。

3. It is important to ensure that each customer of the supply chain is not on the government's wanted list of money laundering, defraud or terrorism;

4、定期获取供应链客户经营状况（包括商业与财务详情）及交易目的信息。

4. It is needed to obtain the information on operation conditions (including commercial and financial details) and the trading purpose of the supply chain customers.

(二)、矿产银客户

II. Mined silver customers

矿产银客户，在交易时，需注意以下问题，同时告知客户：

For the Mined silver customers, it is needed to notice the following questions during the transaction and inform the customers at the same time:

- 1、必须获得白银的产地来源信息。；
1. The silver origin information must be obtained;
- 2、提供采矿许可证；
2. It is needed to provide the mining license;
- 3、提供进/出口白银许可证；
3. It is needed to provide the silver import/export license;
- 4、采矿情况信息证明，包括：是否侵犯人权、是否违规操作等；
4. Mining information proof is required, including whether the human right is violated, whether it is a violation operation and others;
- 5、开采能力数据；
5. Mining ability data is required;
- 6、公司会持续不断的对矿产银客户进行尽职调查。
6. The Company will constantly perform due diligence for the mineral silver customers.

(三)、回收银客户

III. Recycled silver customers

回收银客户，在交易时，需注意以下问题，同时告知客户：

For the recovery silver customers, it is needed to notice the following questions during the transaction and inform the customers at the same time:

1、再生银供应商需提供合法的商业关系，包括：再生银来源证明、收益人证明等；

1. The regenerated silver suppliers need to provide legal commercial relationships, including origin identification of regenerated silver, beneficiary certificate, etc.

2、公司会持续不断的对再生银客户进行尽职调查。

2. The Company will constantly perform due diligence for the mineral silver customers.

（四）、高风险情况处理步骤

IV. Process steps for high-risk conditions

通过风险等级判断，出现高风险情况时，公司将采取以下步骤进行处理：

Though the judgment of risk level, when there are any high-risk conditions, the Company will take the following steps to deal with it:

1、现场调查/访问高风险供应链，证实供应链尽职调查文件记录的调查结果。

1. The high-risk supply chain shall be provided with the field investigation/visit to testify the investigation result of the document

records for the supply chain due diligence;

2、对于大规模开采的白银：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、中间商、白银交易商、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。

2. For the silver from large-scale mining: it is needed to verify the situation by utilizing reliable documents, data and information from an independent source. From the mine to the refinery, the information of both the benefit owner of every company in the supply chain (including the silver producers, middlemen, dealers, exporters and carriers) and the governmental monitoring list is required to be verified;

3、对于手工/小型矿开采的白银：使用可靠的独立来源的文件、数据和信息来核实情况，从白银出口商到精炼厂，供应链中每一家公司（包括国际白银交易商和运输商）的收益所有人和政府监控名单信息都要求要核实。

3. For the silver from manual mining/small mines: it is needed to verify the situation by utilizing reliable documents, data and information from an independent source. From the silver exporter to the refinery, the information of both the benefit owner of every company in the supply chain (including the international silver dealers and carriers) and the governmental monitoring list is required to be verified;

4、对于回收银：使用可信的独立来源的文件、数据和信息来核实情

况，从白银供应方到精炼厂，供应链中每一家公司（包括运输商）的收益所有人和政府监控名单信息都要求要核实。

4. For Recycled silver: it is needed to verify the situation by utilizing reliable documents, data, and information from an independent source. From the silver supplier to the refinery, the information of both the benefit owner of every company in the supply chain (including the carriers) and the governmental monitoring list is required to be verified.

六．白银供应链交易监控

VI. 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 conduct review and regulation throughout the transaction for the transaction-related process to ensure the conformity of knowledge for supply chain and risk forecasting during the transaction. The regulatory application of the transaction is carried out based on risk.

因此，公司对每一批收到的白银获取并记录以下信息：

Accordingly, the Company obtains and records the following information for each silver shipment received:

一、原生银

I. 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 document (Freight/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.

二、回收银

II. 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 document (Freight/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 of recovered silver, the Company must require the customer to provide corresponding documents for mutual verification to verify whether the documents are true and consistent. At the same time, it is needed to conduct a background check on the transaction. If there is any inconsistent situation, the company shall conduct an investigation and prepare 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。

Each year, the Compliance Officer of each department shall submit the risk assessment report to the Risk Control Compliance Officer and the Risk Control Compliance Officer shall submit the summarized 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 senior management of the Company conducts risk assessment including approval for each supply chain that is evaluated as high-risk, and re-decides whether to continue the business relationship with it annually.

白银供应链尽职调查文件记录保存

Retention of Due Diligence Documents and Records for Silver Supply Chain

公司要保存足够的供应链的证明文件记录，按照供应链尽职调查系统的标准来评判风险的要求，来证明充分且持续的完成了尽职调查。记录保存至少5个会计年度。

The Company shall keep adequate supply chain documentation records and assess risk requirements according to the standards for the due diligence system of the supply chain to demonstrate that the due diligence has been fully and continuously completed. The records shall be kept for at least 5 fiscal years.

白银供应链尽职培训

Due Diligence Training of Silver Supply Chain

公司每年会对白银供应链中的所有员工进行该规则的培训。并将培训计划纳入公司年度培训计划当中。

The company trains all employees working in the silver supply chain on this rule every year and incorporates the training plan into the annual training plan of the Company.

一、培训要求

I. Training requirements

所有员工必须参加，并通过培训签到的形式进行相关培训确认。

All employees must attend the training and it is needed to conduct relevant training confirmation through the form of training sign-in.

二、培训方式

II. Training method

采用内训讲解授课方式，讲师由合规风控官指定，人力资源部配合安排。

The teaching method of internal training explanation is adopted. The lecturer shall be appointed by the Compliance Risk Control Officer and the Human Resources Department shall cooperate with the arrangement.

三、培训反馈

III. Training feedback

培训后，由基层管理者进行培训效果检查。检查不合规者，进行

再培训。再培训名单由基层管理者提供。

After training, the primary-level management shall check the training effect. In case of non-compliance, re-training is required. The re-training list shall be provided by the primary-level management.

四、培训档案

IV. Training files

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 training files shall be established and the records shall be kept for at least 5 fiscal years.

白银供应链违规上报通讯机制 **Communication Mechanism for Violation Report of Silver Supply Chain**

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。

If any staff related to the company's internal silver supply chain finds any violation, he/she shall timely report by email and phone to the compliance officer of his/her respective sector, who shall then report by email and phone to the Compliance Risk Control Officer.

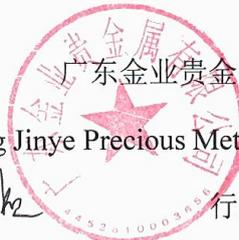
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广东金业贵金属有限公司
Guangdong Jinye Precious Metals Co., Ltd.

李颖 行政部

Administration Department

2023年12月10日

Dec. 10, 2023