



**江铜集团**

Jiangxi Copper Corporation

江西铜业铅锌金属有限公司

Jiangxi Copper Lead & Zinc Metal Co., Ltd

2024 年度白银供应链尽职调查合规报告

Due Diligence Management Compliance Report of  
Silver Supply Chain in 2024

(2024/01/01-2024/12/31)

Company Name:	江西铜业铅锌金属有限公司 Jiangxi Copper Lead & Zinc Metal Co., Ltd
Location:	High Tech Industrial Park, Hukou County, Jiujiang City, Jiangxi Province, P.R.China.
Reporting year-end:	31 December 2024
Date of Report	23 January 2025
Senior management responsible for this report	刘湖滨/副总经理 Mr. Liu Hubin/Deputy General Manager

根据《伦敦金银市场协会负责任的白银指南》（第二版）的要求，公司通过建立强大的管理体系，对供应商进行严格的尽职调查，避免系统性或广泛性的侵犯人权行为、避免产生冲突，采用供应链尽职调查方法对所有供应商进行风险识别和评估，制定了高风险供应链的管理策略，确保供应链风险在可接受范围内，确保本公司的白银供应链完全符合 LBMA 负责任白银指南的要求。

According to the requirements of the second edition of the the Responsible Silver Guidance issued by LBMA, the Company has established a strong management system, conducted strict due diligence on suppliers, avoided systematic or widespread human rights violations, and avoided conflicts. The supply chain due diligence method has been used to identify and evaluate risks for all suppliers, and a high-risk supply chain management strategy has been developed to ensure that supply chain risks are within an acceptable range and that the company's silver supply chain fully complies with the requirements of the LBMA Responsible Silver Guidelines.

本报告总结了江西铜业铅锌金属有限公司 2024 财年内（2024 年 1 月 1 日-2024 年 12 月 31 日）对《伦敦金银市场协会负责任的白银指南》要求的遵守情况。

This report summarized how Jiangxi Copper Lead & Zinc Metal Co., Ltd has complied with the requirements of *LBMA Responsible Silver Guidance* for the fiscal year 2024 (January 1, 2024-December 31, 2024).

一、公司概况

I.Company Overview

江西铜业铅锌金属有限公司于 2009 年 9 月成立，为世界 500 强企业-江西铜业集团有限公司所属控股法人企业，位于江西省湖口县高新技术产业园，生产铅锭、锌锭、金锭、银锭、硫酸等优质主产品，作为江铜集团铅锌板块的“桥头堡”，公司贯彻新发展理念、融入新发展格局、推进高质量发展，致力建设世界一流铅锌联合冶炼企业。

一期 20 万吨/年铅锌冶炼及资源综合利用项目首次引进基夫赛特直接炼铅技术，与常规湿法炼锌工艺形成国内独一无二的铅锌联合冶炼工艺,发挥出了资源利用率高、环境保护好、自动化程度高、能源消耗低等显著优势，2013 年荣获中国有色金属工业科学技术一等奖。公司连续八年保持盈利，先后通过“五标一体”管理体系认证、“国家高新技术企业”认证、“国家认可实验室”认证，获评工信部工

业领域电力需求侧管理示范企业、工信部铅锌行业首批合规企业，授予“全国‘安康杯’竞赛优秀组织单位”“‘十三五’江西省安全生产工作先进单位”“江西省品牌建设先进单位”“第八届九江市市长质量奖”，“江铜”牌铅锭、锌锭获评首届“江西精品”称号。2022年6月，公司取得“AEO高级认证企业”资格，入选2022年度江西省管理创新示范企业榜单，企业管理规范化、精细化、信息化之路越走越宽，位列2024年“江西百强企业”第34位。

Jiangxi Copper Lead and Zinc Metal Co., Ltd, established in September 2009, is a holding entity enterprise of Jiangxi Copper Corporation Limited, one of the world's top 500 enterprises. Located in High-tech Industrial Park, Hukou County, Jiangxi Province, it producing lead ingots, zinc ingots, gold ingots, silver ingots, sulfuric acid and other high-quality main products, As the "bridgehead" of Jiangxi Copper Corporation Group's lead and zinc sector, the Company implements the new development concept, integrates into the new development pattern, promotes high-quality development, and committed to building a world-class lead and zinc combined smelting enterprise.

With capacity of 200kt/a, we are the first one who developed advanced lead and zinc joint smelting process by combining world-class Kivcet Lead Smelting with conventional hydrometallurgy of zinc, having several significant advantages, like high resource utilization, environmental protection, high degree of automation, low energy consumption etc., the Company won the first prize of the 2013 China Non-ferrous Metal Industry Science and Technology Award. The Company makes profit for eight consecutive years, successively achieve the FIVE STANDARD MANAGEMENT SYSTEM CERTIFICATE, NATIONAL HIGH-TECH ENTERPRISE CERTIFICATION, NATIONAL ACCREDITATION LABORATORY CERTIFICATION. It's a model enterprise of power demand management Ministry of Industry and Information Technology, the ministry of industrial power demand side management demonstration enterprise, the ministry of lead and zinc industry's first compliance enterprises. The Company awarded the Excellent Organization Unit of the National "Ankang Cup" Competition, the Exemplary Organization of Safety Production in Jiangxi Province during the 13th Five Year Plan, the Exemplary Organization of Brand Building in Jiangxi Province, and the Eighth Mayor of Jiujiang City Quality Award, JCC brand lead ingot, zinc ingot named the first "Jiangxi Boutique" title. The Company has obtained the qualification of "AEO Advanced Certification Enterprise" in June 2022 and was elected into the list of management innovation demonstration enterprises in Jiangxi Province in 2022, the road to standardization, refinement and informatization of enterprise management is getting wider and wider. It ranked 34th among the "Top 100 Jiangxi Enterprises" in 2024.

## 二、合规性概述

### II. Compliance Overview

公司对所有供应商进行严格的尽职调查，确保原料来源合法合规。

The Company conducts strict due diligence on all suppliers to ensure that the source of raw materials is legal

and compliant.

## 第一步：建立强大的公司管理体系

### Step 1: Establish strong company management systems

#### 合规声明

#### Compliance Statement with Requirement:

我们完全遵循第一步：建立强大的管理体系，开展白银供应链尽职调查工作。

We have fully complied with Step 1: Establish strong management systems and conduct due diligence in the silver supply chain

#### 1、公司政策

#### 1、Company Policy

合规陈述：

Presentation of compliance:

为建立适当的供应链尽职调查政策和治理结构，监督预防和减轻冲突矿产或不利于环境、社会 and 治理因素在公司供应链中的风险，公司根据 LBMA 发布的负责任白银第 2 版要求更新白银供应链尽职调查的政策，明确尽职调查流程和调查范围，使采购政策有据可查，政策明确指出采购不应涉及所有威胁性融资风险，包括经济合作与发展组织附件二所列风险，并根据新版《LBMA 负责任白银指南》明确白银供应链中需考虑的环境、社会 and 治理因素。公司于 2024 年修订了第二版《江西铜业铅锌金属有限公司 LBMA 负责任白银供应链尽职调查管理体系》，并通过了合规总监批准，公司每年对政策进行复查，根据变化情况及时更新，对所有相关员工进行宣讲，确保白银尽责体系有效运行。同时，公司也将该政策发布在官方网站上，网址为 <https://www.jxccqx.com/news/show/105>

In order to establish an appropriate supply chain due diligence policy and governance structure and to monitor and mitigate the risk of conflict minerals or adverse environmental, social and governance factors in the company's supply chain, the Company update the due diligence policy of the silver supply chain, clarify the due diligence process and scope and make the procurement policy evidence-based according to the requirements of the second edition of the Responsible Silver Guidance. The policy specifies that procurement should not involve all threatening financing risks, including those listed in Annex II of OECD and identifies environmental, social and governance factors to be considered in the silver supply chain in accordance with the LBMA Responsible Silver Guidance. The second edition of the Jiangxi Copper Lead and Zinc Metal Co., Ltd LBMA Responsible Silver Supply Chains Due Diligence Management Systems, which was revised in 2024, approved by the compliance director in 2024. The Company conducts an annual review of policies, updates them in a timely manner based on changes, and educates all relevant employees to ensure the effective operation of the Silver Responsibility System. Meanwhile, the Company also publishes the policies on its official website at <https://www.jxccqx.com/news/show/105>

2024 年度，公司严格按照体系要求完成所有白银供应商尽职调查，并进行风险识别和评估，有效的管控了白银供应链的风险,公司的白银供应链尽职调查政策严格禁止白银供应商有如下行为：

The Company completed the due diligence for all silver suppliers and conducted risk identification and evaluation according to the requirements of these systems in 2024, effectively managing and controlling the risk of silver supply chains. The following behaviors of silver suppliers are strictly prohibited by the due diligence policies for silver supply chains of the Company:

a. 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；

a. Human rights violations, including employing child labors, using excruciation, inhuman and degrading treatment, wide use of violence or other forced labor against human rights, war crimes, crimes against humanity or genocide;

b. 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”）；

b. Providing direct or indirect support for illegal armed organizations or mining areas, dealers, other intermediary organizations, public or private security forces for transportation routes illegally controlled through supply chains, or illegally taxing or extorting money or minerals in the whole supply chains (“illegal armed organizations, public or private security forces);

c. 通过贿赂或欺诈掩盖白银原产地；

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

d. 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；

d. Non-compliance with taxes, fees, royalties due to governments related to mineral extraction, trade and export from conflict affected and high-risk areas;

e. 洗钱或恐怖主义融资；

e. Money laundering or terrorist financing;

f. 资助冲突；

f. Contribution to conflict;

g. 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；

g. Engaging in high-risk business, such as weapons, gambling, antiques and artworks, religious sects and their leaders;

h. 受益人是政治敏感人物或通缉人员；

h. The beneficiaries are the politically sensitive person or wanted person;

i. 不符合环保和可持续发展的合法要求，违反环境、健康、安全、劳动和社区相关立法。

i. The supply chain does not conform to legal requirements of environmental protection and sustainable development,violation of environmental, health, safety, labor and community related legislation.

j. 开采银来自被指定为世界遗产地的地区。

j.Mining Silver comes from areas designated as World Heritage Sites.

## 2、管理架构

### 2、Internal management structure

合规陈述：

Presentation of compliance:

根据体系要求，公司已建立供应链尽职调查管理制度，明确了组织架构及管理职责，公司设置合规委员会，合规委员会由公司总经理任主任，公司生产副总与经营副总任副主任，委员成员包括相关部门、分厂主要负责人。合规委员会负责审批供应链尽职调查政策和制度、合规报告，负责提供足够的资源支持开展供应链尽职调查流程和系统的运行和监控。

The Company established a supply chain due diligence management system, clarifying the organizational structure and management responsibilities based on the requirements of the systems,The Company has also set up a compliance committee, The Compliance Committee is chaired by the Company's general manager, and the Company's board member vice president is the deputy director. The members include the heads of relevant departments and workshops. The Compliance Committee is responsible for approving supply chain due diligence policies and systems,compliance reports, and providing sufficient resources to support the operation and monitoring of supply chain due diligence processes and systems.

合规总监：公司授权的高级管理者副总经理刘湖滨，刘湖滨副总自我公司建厂以来一直为我公司重要董事，且负责公司经营管理工作，对经营管理有着丰富的理论知识和实操经验,对白银供应链负责任采购管理体系建设提供充足的人力、资金等资源。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（包括是否与高风险供应商合作的合同签订），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。

Compliance Director: Mr. Liu Hubin, a senior manager and the Deputy General Manager authorized by the Company. He has been an important director of the Company since its establishment, and is in charge of the operation and management of the Company with his rich theoretical knowledge and practical experiences of operation and management. He is responsible for providing sufficient human resources, capital and other resources for the construction of responsible procurement management system of silver supply chain.Externally, based on the Company's raw material purchasing policies and actual requirements of production, financial and sales situations, he takes charge of reviewing and approving the signing of

cooperation contracts with suppliers (including whether to sign contracts with high-risk suppliers), and reviewing suppliers. Internally, on the basis of the *LBMA Responsible Silver Guidance*, senior managers are responsible for training the related employees and ensuring related personnel in charge to clearly understand the purpose & meaning of the systems and know their responsibilities in the implementation of the due diligence policies. Besides, they should also organize the training to review the related contents every six months.

合规经理（周圣兵）：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，确保在高风险供应链或交易时采取了恰当的措施，提交风险评估报告。并有义务就负责任供应链方面进行培训，起草和更新白银供应链政策，为高级管理者履责提供准确的信息。

Compliance Manager (Mr. Zhou Shengbing): He assists the senior managers in fully taking charge of the silver supply chains due diligence, and is also in charge of all matters related to the silver supply chains, so as to ensure that appropriate actions are taken for high-risk supply chains or during the transaction, and to submit the risk evaluation report. Besides, it is his duty to conduct training on responsible supply chains, draft & update policies of silver supply chains, and provide accurate information for senior managers to fulfill their responsibilities.

营销部：确保原材料精矿供应的长期性、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，营销部需对交货人身份信息进行确认。

Marketing Department: It is necessary to ensure the long-term, stability and safety of the supply of raw material concentrates, and refuse to cooperate with related enterprises, organizations or countries in high-risk areas. Marketing Department should confirm the identity information of the delivery personnel.

质量计量部负责对采购含银原料进行过磅称重、出入库记录；负责与营销部结合，保证含银原料接收的准确性；做好银锭质量监督检查工作，制定实施培训计划。

Quality Measurement Department is in charge of weighing and making warehousing records of purchased silver-bearing materials; in combination with the Marketing Department, is responsible for ensuring the accuracy of receiving silver-bearing materials and conducting quality supervision and inspection of silver ingots, as well as developing and implementing training plans.

检化部负责对采购含银原料进行化验，确保检测白银纯度的准确性；

The Inspection and Chemical Department is responsible for testing the purchased silver-bearing materials and ensuring the accuracy of silver purity testing

稀贵分厂负责对产出银锭进行称重、打标记录，车间组织投料生产并做好投料记录和产出银锭记录，在生产过程中采用封闭式流程，确保白银生产加工的安全性与可追溯性。稀贵分厂负责对白银销售前的数量的统计，保证白银实物出厂的安全性。

the rare and precious metal branch is in charge of weighing, marking and recording the produced silver ingots.

Besides, the workshop should organize the production of material input and make feeding records and the records of the produced silver ingots. The closed process should be provided during the production, so as to ensure the safety and traceability of silver production and processing. It is in charge of calculating the quantity of silver before sales to ensure the safety of leaving the factory for the physical silver.

财务部负责完整保存所有客户的交易凭证，在交易过程中，采用监督机制确保交易的安全性，保证公司不参与恐怖主义融资。

The responsibility of the finance department is to keep all transaction documents intact. It is also needed to ensure that the Company does not participate in the terrorist financing.

2024 年度，管理团队严格按照体系文件要求对所有白银供应商进行了尽职调查，合规经理对所有调查结果进行了监督和审核，确保所有含银物料供应商在合作前都满足 LBMA 要求并得到合规总监的批准，所有原料采购业务均签订合同、供应商承诺书，所有供应商均承诺含银物料来源符合白银指南要求。

The management team conducted due diligence for all silver suppliers in strict accordance with requirements of the system documents in 2024. Besides, the Compliance Manager implemented supervision and audit for all results of the due diligence, so as to ensure that all suppliers of silver-bearing materials meet the requirements of LBMA and are approved by the Compliance Director before cooperation. A contract and letter of commitment for suppliers were signed for all raw material procurement businesses. All suppliers promised that the source of silver-bearing materials complied with the requirements of silver guidance

### 3、培训

### 3、Training

合规陈述：

Presentation of compliance:

公司每年采取多种方式对相关岗位以及合规小组成员宣讲供应链尽职调查管理、LBMA 负责任的白银指南等知识，并定期组织所有关于白银相关部门进行培训，以确保公司相关岗位以及合规小组成员熟悉供应链尽职调查管理和 LBMA 负责任的白银指南，2024 年度按照年度培训计划共计进行了两次集中培训，即关于供应商尽职调查能力建设会议与关于负责任白银指南第二版学习培训会议，所有相关人员均参加了培训，此类培训旨在帮助有关员工和供应商深入了解白银供应链尽职调查管理制度和新版负责任白银指南的更新内容。培训后进行了效果评价，并且保留培训记录。

The Company promotes supply chain due diligence management and LBMA responsible silver guidance to relevant positions and compliance team members through various means every year, and regularly organizes the training for all departments related to the silver, to ensure that relevant company positions and compliance team members are familiar with supply chain due diligence management and the LBMA Responsible Silver



Guidance, a total of two training sessions were held according to the company's annual training plan in 2024, including conference to help suppliers to build due diligence capability and conference on the second edition of the LBMA Responsible Silver Guidance, all employees with regard to the silver supply chain participated in the training. Such training aims to help relevant employees and suppliers gain a deeper understanding of the silver supply chain due diligence management system and the updated content of the new Responsible Silver Guide. Effect evaluation was conducted after the training and training records were saved.

#### **4、与供应商约定**

#### **4、Engagement with silver suppliers**

合规陈述：

Presentation of compliance:

根据管理体系的要求，在与供应商签订合同前，公司业务人员依据公司的合规要求，将公司负责任白银供应链管理政策及要求明确告知供应商，以确保他们了解公司 LBMA 管理的要求和供应链政策，向供应商发放尽职调查表和承诺书，在承诺书中，白银供应商应以书面形式承诺并承认，提供的所有原料应符合 LBMA 白银负责任指南，避免冲突区域和高风险区域开采、处理进出口金属产品、滥用人权、融资非政府武装实体、违法犯罪团伙、贿赂、欺诈、洗钱等，收集营业执照等资料，之后跟踪、取回尽职调查表和承诺书，并进行风险评估，2024 年公司供应链管理政策及要求的传达，尽职调查问卷、承诺书的回收和风险评估工作已全部完成。

According to the requirements of management systems, the Company's business personnel shall clearly inform the supplier of the Company's responsible silver supply chain management policies and requirements before signing the contract with suppliers, to ensure that they understand the Company's LBMA management requirements and supply chain policies, and issue due diligence form and commitment letter to the supplier. In this letter of commitment, silver suppliers should commit to, and acknowledge in writing that all raw materials provided by the seller should conform to LBMA Silver Responsible Guidance to avoid mining and handling import and export of metal products in conflict areas and high-risk areas, abuse of human rights, financing of non-governmental armed entities, illegal and criminal gangs, bribery, fraud, money laundering, etc., collect business license and other materials, then track and retrieve due diligence questionnaires and commitment letters, and conduct risk assessments. The communication of the company's supply chain management policies and requirements, the collection of due diligence questionnaires and commitment letters, and the risk assessment work have all been completed in 2024.

与供应商开展业务后，充分利用电话、微信与之进行更多的交流沟通，每年组织人员选择几家供应商开展实地拜访活动，借助大型行业研讨会的机会与供应商见面洽谈，了解其运营情况并传达加强供应链调查的期望，公司在开展供应链尽职调查时邀请供应商参与，或派遣合规专员对供应商进行线上辅

导，分享公司的经验，帮助其理解尽职调查的重要性、流程和方法，以提高白银供应商的尽职调查能力。

After establishing business relationships with suppliers, the Company leverages communication channels such as phone calls and WeChat for enhanced engagement. Annually, professional teams are organized to select key suppliers for on-site visits, while coordinating with major industry conferences to conduct business meetings. These interactions allow the company to assess suppliers' operational status and communicate expectations for strengthened supply chain due diligence. When conducting supply chain due diligence, the Company either invites suppliers to participate in evaluations or dispatches compliance officers to provide online training. By sharing best practices, the Company systematically clarifies the significance, standardized procedures, and implementation methodologies of due diligence, thereby enhancing the capabilities of silver suppliers in compliance management.

公司支持实施采掘业透明度行动计划原则。

The Company supports the implementation of the principles of the Extractive Industries Transparency Initiative (EITI).

## 5、供应链可追溯系统

### 5、Supply chain traceability system

合规陈述：

Presentation of compliance:

公司根据《LBMA 负责任白银指南》，确定了供应链追溯体系，在业务过程中，收集和保存所有供应商提供的信息，包括供应商名称、产地、合同评审表、合同文本、结算方式、运输过程、重量和检验报告、生产日期、入库时间等。每批出库银块都有一个唯一的编号，并有一个出库台帐记录，包括日期、重量、质量等。

The Company has determined the traceability system of supply chains based on the requirements of the LBMA Responsible Silver Guide. It collects and saves all information provided by suppliers in the process of business, including supplier name, origin, the contract review form, contract text, method of settlement, transportation process, weight and inspection reports, warehousing time, etc. Each batch of outgoing silver bullion is assigned a unique number, and there is an outgoing account record, including the date, weight, quality, etc.

根据保留的所有记录，可以完成从成品追溯到原料、从原料追溯到成品，并能追溯每个供应商每批产品的采购合同，根据合同内容可以追溯包括贵金属类型、采购重量、分析报告以及相关尽职调查文件等信息。

Based on all saved records, it is able to trace from finished products to raw materials and from raw materials to finished products, and trace the procurement contracts about every batch of products of all suppliers.

Furthermore, according to these contracts, it is able to trace a lot of information including types of precious metals, procurement weight, analysis reports and related due diligence documents, etc.

## 6、交易付款和交易监控

### 6、 Transaction Payment & Monitoring

合规陈述：

Presentation of compliance:

公司所有业务均通过官方银行渠道收款和付款，没有任何现金交易，每笔货款都经过严格审批后支付。国外进口精矿结算是通过信用证付款，国内是通过银行转账付款。

The receipt and payment of all business of the Company should be subject to the official bank channels, without any cash transaction, and each payment is made after strict approval. The settlement of concentrates imported from abroad is made through the letter of credit, and that of domestic concentrates is made through bank transfer.

根据管理体系要求，我们对每批白银产品都进行交易监督，保留相关付款凭证。合规专员负责交易监控工作，对不符或以任何形式疑似不符的交易背景进行检查，并书面确认调查结果，报告给合规总监。

此外，我们与当地政府建立了反洗钱合作关系，任何洗钱行为我们都会第一时间通知政府，并配合政府进行洗钱调查。2024 年度的交易全部采用银行转账方式，未出现异常现象。

The Company supervises the transaction of every batch of silver and keeps related payment vouchers in accordance with requirements of the management systems. Besides, the Compliance Officer is responsible for monitoring the transaction and checking the background of transactions that do not meet the requirements or are suspected to not meet the requirements in any form. The findings should be confirmed in writing and reported to the Compliance Director. In addition, the Company has established an anti-money laundering partnership with the local government. It will immediately notify the government of any money laundering and cooperate with the government in money laundering investigation. Moreover, all transactions in 2024 were subject to the bank transfer without any anomaly.

## 7、记录保留

### 7、 Records keeping

合规陈述：

Presentation of compliance:

根据公司<白银供应链尽职调查管理体系>要求，所有供应商相关文档，包括供应商营业执照、采矿证等资质验证资料复印件、尽职调查文件、风险评估表、合规文件、合同文本、检验记录、结算单、银行转账以及出入库记录等均至少保存五年。

According to the requirements of the Company's *Silver Supply Chains Due Diligence Management Systems*, all documents related to suppliers shall be kept for at least five years, including photocopies of qualification

verification data such as the Suppliers Business License and Mining License, due diligence documents, risk evaluation forms, compliance documents, contract text, inspection records, settlement sheet, bank transfer and warehousing records, etc.

## 8、沟通和机密申诉机制

### 8、Communication & Confidential grievance mechanisms

合规陈述：

Presentation of compliance:

合规小组内部每年定期对当年的供应链尽职调查相关信息进行内部沟通，沟通事项包括日常尽职调查管理工作内容及对于当期合作客户尽职调查工作文件，及时发现违反内部尽职调查流程的行为并进行整改，2024 年未出现违反内部尽职调查流程的情况。

The compliance team conducts regular internal communication on the supply chain due diligence related information for the current year, including daily due diligence management work and due diligence work documents for current cooperative customers. Any violations of the internal due diligence process are promptly discovered and rectified, and there have been no violations of the internal due diligence process in 2024.

公司建立了申诉机制，并且申诉机制在含银物料采购过程中均向供应商进行了必要的沟通，内外部利益相关方可以匿名举报有关白银交易过程中的违规行为。工厂设立了意见箱，作为内部员工的举报与申诉途径，并由相关人员定期开箱检查汇总举报内容。公司尽职调查政策、电话、电子邮箱均在公司网站发布，所有员工及供应商均可以通过网络了解这些信息，凡对政策有疑问或者发现违规行为的可以通过电话、电子邮箱等方式进行反馈，电话号码为：0792-6376404，邮件地址为：lijian1211@126.com。在整个申诉过程中保护申诉人隐私，对举报人信息保密，杜绝任何行为的打击报复。

要求公司合规专员定期查看工作中接收到的相关方关于负责任供应链的与采矿、贸易、加工和出口情况有关的疑虑方面的信息，通过调查、供应商询问、内部程序检查等方式进行落实，并将处理申诉用简洁明了的语言解释问题原因和解决方案，再通过电话、电子邮件、邮寄、微信或面对面会议等多渠道方式向利益相关者传达解决方案。

2024 年度公司工会共收集员工实名申诉 16 条，其中关于工作条件方面有 11 条，关于卫生方面 1 条，关于员工福利方面 4 条，将以上申诉内容按涉及的部门进行归类负责处理，工会负责跟踪督促落实，年内已完成 15 条申诉处理落实，剩余 1 条申诉是福利方面，员工希望新增免费通勤车，因需要进行前期摸底调研、寻找合适客运公司商讨、确定详细的方案，故耗时较长预计将于 2025 年一季度全部完成，申诉处理详情已在公司内部工作网站进行公告。2024 年度没有收到外部利益相关方的申诉。

The Company has established a grievance mechanism, and necessary communication has been made with suppliers during the procurement of silver-bearing materials. Besides, the internal and external stakeholders can anonymously report violations during the silver transaction. As the report method for internal employees,

the report box has been set by the factory and will be opened & checked regularly by the related personnel. The report contents will also be summarized regularly by the related personnel. The Company's due diligence policy, telephone No. e-mail are all published on the websites of the Company, all employees and suppliers of the Company can access this information through the Internet. In case of any questions about the policy or occurrence of any violations, feedbacks can be conveyed via telephone ( 0792-6376404 ), e-mail ( lijian1211@126.com ), etc. The Company protects the privacy of the appellant throughout the entire appeal process, keeps the information of the informant confidential, and prohibits any retaliatory actions.

The Company requires compliance officers to regularly review concerns raised by stakeholders regarding responsible supply chain practices in mining, trade, processing, and export operations. These concerns are addressed through investigations, supplier inquiries, and internal procedure audits. The root causes and solutions are explained in clear, concise language, with resolutions communicated to stakeholders through multiple channels such as phone calls, emails, postal mail, WeChat, or face-to-face meetings.

In 2024, the Company's labor union received 16 real-name reported employee grievances, categorized as follows: 11 workplace condition cases, 1 occupational health case, and 4 employee benefit cases. The grievances were assigned to relevant departments for resolution, with the union overseeing progress tracking. By year-end, 15 cases had been fully resolved, the remaining one is related to employee benefit, the employee suggested adding free commuter buses. Due to the need for preliminary research, finding suitable passenger transport companies to discuss and determine detailed plans, it will take a long time and is expected to be completed in the first quarter of 2025. Detailed resolution updates have been published on the company's internal portal. No external stakeholder grievances were reported during the year.

## 第二步：识别和评估供应链风险

### Step 2: Identify and assess risks in the supply chain

#### 合规声明

#### Compliance Statement with Requirement:

我们完全遵循第二步：识别和评估供应链风险

We have fully complied with Step 2: Identify and assess risks in the supply chain.

公司严格遵守 LBMA 白银负责任指南第二步“供应链风险的识别与评估”的要求，明确制定了零容忍、高风险供应链的判定标准，并对识别出来的风险规定了处理程序，充分对供应链中的风险进行识别和评估。2024 年未发现零容忍和高风险供应链。

The Company strictly adheres to the requirements of the second step of the LBMA Silver Responsibility Guidelines, "Identification and Evaluation of Supply Chain Risks," has developed criteria for determining zero tolerance and high-risk supply chains, and has established procedures for handling identified risks, fully

identifying and evaluating risks in the supply chain. No zero tolerance and high-risk supply chain has been identified in 2024.

## 1、供应链风险识别

### 1、Identify risks in the supply chain

合规陈述：

Presentation of compliance:

公司根据经合组织《受冲突影响和高风险地区矿产负责任供应链尽职调查指南》附件 II 并延伸至供应链中不利的 ESG 因素，识别从产地到精炼厂的供应链相关风险，公司在与供应商签合同之前为每个供应商建立供应商档案，填写 KYC 问卷，并对其进行风险评级，密切关注来自不遵守环境和可持续发展法律要求以及源于世界遗产遗址等地区的白银，侵犯人权、武装冲突、非法开采等地区的白银，以及用于贿赂、洗钱、恐怖主义融资等行为的白银。

The Refiner shall identify relevant risks related to the supply chain from the origin to the refinery in accordance with Annex II in *Guidelines for Due Diligence of Responsible Supply Chains for Minerals in Conflict-Affected and High-Risk Areas* of Organization for Economic Co-operation and Development, and adverse ESG factors extended to the supply chain. The Company established a supplier file for each supplier for filling in a KYC questionnaire, completed the establishment of the supplier file before signing a contract with it, and performed a risk rating on it. The Company closely monitors silver originating in areas such as non-compliance with environmental and sustainable development law requirements and from World Heritage sites, human rights violations, armed conflict, illegal mining, and for use in bribery, money laundering, and terrorist financing. 管理体系中规定了供应商风险识别方法，涵盖了含银物料从原产地到精炼厂的所有风险，通过《供应商尽职调查表》进行风险识别，识别方法包括，建立供应链客户档案，包括：企业名称、法定代表人、地址、联系方式、营运方式、生产方式、交易合同等；对既有供应链客户需定期进行核查，如有新建或变更的客户，需及时对其进行档案资料检查，保持档案资料库处于最新状态；识别每一客户、企业和企业收益所有人，使用可靠的独立来源文件、数据或者信息来验证其身份；确定供应链中每一客户、企业和企业收益所有人不在任何政府的洗钱、诈骗或恐怖主义通缉名单上；定期获取供应链客户商业和财务方面的详细情况、从事白银交易目的及商业运作情况。

The management system specifies the methods for supplier risk identification, covering all risks of silver-bearing materials from the origin to the refinery. Risk identification shall be carried out in accordance with the *Due Diligence Questionnaire on Suppliers*, and identification methods include establishing customer archives in the supply chain, covering: company name, legal representative, address, contact information, way of operation, way of production and trade contract; regularly checking the existing customers in the supply chain and inspecting archival data timely in case of new customers or changed customers to keep the archival database up-to-date; identifying each customer, enterprise and enterprise income owner, and verifying their

identities through reliable independent-source documents, data or information; ensuring that all customers, enterprises and enterprise income owners in the supply chain are not in any wanted list of the government in connection with money laundering, defrauding or terrorism; regularly obtaining detailed information on business and finance of customers in the supply chain as well as their purposes of silver trading and business operations.

## **1.1、建立供应商档案**

### **1.1、Establish supplier files**

与供应商开始合作之前，公司对于所有供应商均进行供应链的尽职管理调查并对其进行风险评级，风险评判细则可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、关于高风险黄金和白银中心/转运中心和高洗钱风险国家/地区的可靠市场情报，填写 KYC 问卷，在进行合作前要求合作方提供符合供应链尽职调查管理制度要求的相关资质证明文件，对供应商基本情况、股东信息、提供原料类型及产地、贵金属类型、结算方式等信息进行调查，并尽可能地将供应链调查向供应商的上游延伸，对于涉及零容忍供应链、高风险供应链的供应商拒绝合作。

The Company conducted due diligence investigations of all suppliers before the cooperation and performed a risk rating on it. The risk evaluation rules can be referred to the international sanctions list recognized by the Chinese government, Duder-Frank-Frank. Article 1502 of the bill, the European Union's CAHRA list, Heidelberg barometer, the fragile national index or similar index, the report of the UN High Commissioner's Office or the same institution, and the financial action group (FATF). Regarding the reliable market intelligence of high-risk gold And silver centers/transshipment centers and countries/regions of high money laundering risks, fill in the KYC questionnaire, and request partners to provide partners with relevant qualification certification documents that meet the requirements of the supply chain investigation and management system. Basic situation, shareholders' information, providing raw materials and origin and origin, precious metal type, settlement method and other information, and extend the supply chain survey as much as possible to the upstream of the supplier. For the supply of zero tolerance supply chain, high-risk supply chain, Business refuses to cooperate.

## **1.2、交易监测**

### **1.2、Transaction monitoring**

合规陈述：

Presentation of compliance:

精炼厂应对在建立关系的过程中所作的交易开展适当的审查和监测，以确保交易与精炼商对供应链和风险状况的了解一致。交易监测应采用基于风险的方法进行。合作过程中，对于供应商经营动态进行了解和评估，不间断对供应商信息进行追踪调查。充分发挥网络优势，利用天眼查、国家企业信用信息公示系统等网站对国内供应商资质、信用、处罚情况进行查询。借助供应商官网、行业资讯、同行交流等措施对国外供应商业务开展、合规运营等进行深入了解。公司对所有交易情况进行监督，确保交易与供应链调查一致。完成了来自国内和国外的所有矿产银供应商的尽职调查，根据风险及强化尽职调查评估结果，2024 年供应商均为非高风险供应商。

The refinery shall carry out appropriate review and monitoring for transactions conducted in the process of establishing relations to ensure that such transactions are consistent with the Refiner's understanding of the supply chain and risk profile. Risk-based methods shall be adopted for transaction monitoring. During the cooperation process, understand and evaluate the supplier's business dynamics, and continuously track and investigate supplier information. Fully leverage the advantages of the internet and utilize websites such as TianYanCha and the National Enterprise Credit Information Publicity System to query the qualifications, credit, and penalties of domestic suppliers. Utilize measures such as supplier official websites, industry information, and peer exchanges to gain a deeper understanding of the business operations and compliance of foreign suppliers. The Company monitors all transactions to ensure that the transactions are consistent with the supply chain investigation. We have completed due diligence on all domestic and foreign silver suppliers, and according to the risk and enhanced due diligence assessments, all suppliers are non-high risk suppliers in 2024.

公司对供应链尽职调查进行检查，每批原料编号唯一，对于所有的原料采购入库均保留完整的单据资料，对于入库的含银矿粉保存有过磅单、水份测定记录、品位检测报告、结算单、财务凭证等。明确各个部门应在日常工作中收集保存的资料，由营销部、质量计量部、检化部、财务部对相关单据进行保存，并定期将相关资料送至档案室进行存档。

The Company checks the due diligence of the supply chain, including unique number of each batch of raw materials, complete documents and data of all raw materials purchased and put into storage, and weighing lists, moisture measurement records, grade detection reports, final settlements and financial vouchers of the stored silver-containing concentrate. It is required to specify data needing to be collected and preserved by each department in its daily work and the Marketing Department, the Quality Measurement Department, the Inspection and Chemical Examination Department, the Finance Department shall keep relevant documents and send them to the archives room regularly for archival purposes.

### 1.3、风险评估结果的汇报

#### 1.3、Report risk assessment to the designated manager



合规陈述：

#### Presentation of compliance:

以上调查和评估均有合规小组成员参加，从各自负责的专业的领域对于供应商进行评估，由合规经理进行汇总，并代表高级管理团队向合规总监和最高管理层报告开展的审查和监测，合规总监进行综合评审。高级管理层保留对低风险白银供应链的最终控制权和责任。如果是高风险供应商，必须得到最高管理层的批准，并立即停止合作。

The above investigation and assessment were attended by members of the compliance team, who evaluated suppliers from their respective and professional areas of responsibility. The Compliance Manager summarized, reported to the Compliance Director and the top management about review and monitoring for transactions on behalf of the senior management team. The Compliance Director conducted comprehensive review. The senior management shall reserve the ultimate control and liability of the low-risk silver supply chain. For high-risk suppliers, approval from the top management is required for ceasing cooperation promptly. 最后，根据搜集的信息和供应链风险识别的结果，对每个供应商进行单独的风险评估，填写风险评估表，由负责评估的合规总监签字，并填写最终评估日期。

Finally, risk assessment shall be carried out separately for each supplier as per the information gathered and the results of risk identification in the supply chain to fill in the form of risk assessment. This form shall be signed by the Compliance Director in charge of assessment with the final assessment data filled in.

2024 财年我们完成了所有供应商（共计 50 家）的尽职调查；风险评估结果记录在相应的 LBMA 供应链风险评估表中，包括评估标准、意见和理由，根据尽职调查和风险评估结果，未发现零容忍供应链和高风险供应链，2024 年度对供应商的调查和评估结果均为低风险。

In 2024 (fiscal year), we completed due diligence on all suppliers(50 in total) ; The risk assessment results have been completely recorded in the corresponding LBMA Supply Chain Risk Assessment Form, including assessment criteria, opinions and reasons. The Company completed all due diligence for the supplier without zero tolerance supply chain or high-risk supply chain found in 2024. All suppliers were low-risk as per the results of the survey and risk assessment.

## 2、供应链风险分类

### 2、 Risk classification in the supply chain

合规陈述：

#### Presentation of compliance:

公司根据位置风险、供应链风险、原料类型风险三个方面进行风险研判，位置风险可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）、关于高风险黄金白银中心/转运中心和高洗钱风险国家/地区的可靠市场情报。供应链风险可使用工具包中的 KYC 调查问卷对供应链进行风险识别。原料类型风险将原料分类为大规模开采、手工和小规模开采、再生银，再根据各个类型的风险识别要求进行识别。

The Company conducted risk assessment based on three aspects: location risk, supply chain risk, and raw material type risk. For location risk, please refer to the international sanctions list approved by the Chinese government, Article 1502 of the Dodd Frank Act, the EU CAHRA list, the Heidelberg Barometer, the Vulnerable Countries Index or similar indicators, the reports of the Office of the United Nations High Commissioner for Human Rights or equivalent institutions, the Financial Action Task Force (FATF) (including relevant country/region reports) Reliable market intelligence on high-risk Gold, Silver centers/transit centers and countries/regions with high money laundering risk. Supply chain risk could be identified with the KYC questionnaire in the toolkit. Raw materials were classified into large scale mining, manual and small scale mining, and recycled Silver, Silver in raw material type risk and identified according to the risk identification requirements of each type.

## **2.1、高风险供应链**

### **2.1、High risk supply chain**

以下任何一条客观存在时，则该供应链被判定为高风险供应链。合规小组成员应立即准备材料上报合规经理，由合规总监批准采取应对措施，停止交易，消除风险。

When any one of the below evaluation criteria exists objectively, the supply chain is judged as a high-risk supply chain. Members of the department compliance team shall immediately prepare materials and report them to the Compliance Manager, who shall report them to the Compliance Director approve to stop the transaction and eliminate risks.

(1) 原材料白银来自、过境或运输，途经冲突影响或侵犯人权风险较高的地区。

(1) The raw material silver comes from, transits or transports through areas with high risk of conflict impact or human rights violation.

(2) 原材料白银来自一个已知储量有限，资源有限或预期白银产量有限的国家。

(2) The raw material silver is claimed to have come from a country with limited known reserves, limited resources or limited expected silver output.

(3) 原材料白银来自已知具有冲突影响和侵犯人权行为的高风险地区，或者有理由怀疑它是通过该地区传播的。

(3) The raw material silver comes from a known high-risk area with conflict impact and human rights violation, or has reason to suspect that it is transmitted through this area.

(4) 白银供应链中的公司或其他已知的上游公司位于洗钱、犯罪和腐败风险较高的国家。

(4) Companies in the silver supply chain or other known upstream companies are located in a country with high risk in money laundering, crime and corruption.

(5) 白银供应链中公司或其他已知上游公司的实益拥有者是政治公众人物。

(5) The beneficial owner of a company in the silver supply chain or other known upstream company is a politically exposed person.

(6) 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的商业活动，如武器、赌博、赌博、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 business activities such as weapons, gambling, gambling, antiques and artworks, diamonds, religion and religious leaders.

(7) 中国政府确定的其他高风险情况，以及欧盟 CAHRA 名单，多德 - 弗兰克法案,海德堡晴雨表、脆弱国家指数或类似的指数和 FATF 名单等。

(7) Other high-risk circumstances identified by Chinese government and according to EU CAHRAs list, the Dodd Frank Act,the Heidelberg Barometer, the Vulnerable Countries Index or similar indicators, the reports of FATF, etc.

(8). 不符合环保和可持续发展的合法要求，违反环境、健康、安全、劳动和社区相关立法。

(8). The supply chain does not conform to legal requirements of environmental protection and sustainable development,violation of environmental, health, safety, labor and community related legislation.

对于高风险精矿供应商，我们将暂停交易，封存该供应商所有产品并立即进行强化尽职调查，实地考察或参观高风险供应链，证实供应链尽职调查结果的文件记录是否真实，调查结束后出具现场审计报告。

For suppliers of high-risk,we will suspend trading and mothball all products from such suppliers while carrying out intensive due diligence and field investigation or visiting the high-risk supply chain promptly to verify whether the document records of due diligence results for the supply chain are authentic. An on-site audit report will be issued after investigation.

## 2.2、零容忍供应链

### 2.2、Zero-tolerance supply chain

根据尽职调查管理制度中规定的零容忍供应链评判标准对供应商进行识别，2024 年度公司采购的原料没有来自被指定为世界遗产或保护区的地区，没有来自违反国际制裁国家（中国政府承认），也不存在供应商、其他已知的上游公司或其最终受益者是已知的洗钱、诈骗或恐怖分子，不存在曾涉嫌严重侵犯人权，不存在直接或间接支持非法的非国家武装组织，不存在欺骗性地谎报矿物来源。

According to the zero tolerance supply chain evaluation criteria stipulated in the due diligence management system, suppliers were identified. The raw materials purchased by the Company in 2024 did not come from areas designated as World Heritage or protected areas, did not come from countries that violated international sanctions (recognized by the Chinese government), and there were no suppliers, other known upstream companies, or their ultimate beneficiaries who were known money launderers, fraudsters, or terrorists. There were no suspected serious human rights violations, no direct or indirect support for illegal non-state armed organizations, and no deceptive false reporting of mineral sources.

综上，2024 年度期间未发现零容忍供应链和高风险供应链，所有采购有序合规进行。

In conclusion, no zero-tolerance supply chain or high-risk supply chain was found during 2024, and all procurement was conducted in an orderly and compliant manner.

### 2.3、强化尽职调查

#### 2.3、Enhanced due diligence

公司要求如果出现高风险警示信号，从严格控制供应链风险的角度出发，公司将就有具体营业场地的供应商进行实地考察，考察内容包括：业务类型、材料类型、来源地说明、运输方式、上游供应商、货款支付等强化尽职调查，对于单个供应商的实地考察将会每年度至少进行一次。

The Company requires that if high-risk warning signals arise, from the perspective of strictly controlling supply chain risks, the Company will conduct enhanced due diligence through on-site inspections of suppliers with physical business locations. The inspections will cover: business type, material categories, origin declarations, transportation methods, upstream suppliers, payment settlements, and other aspects. For individual suppliers, on-site inspections will be conducted at least once a year.

如果发现含银物料可能来自高风险地区，立即启动公司强化尽职调查程序，按照公司风险减缓管理办法，使用 LBMA 实地考察表等工具，开展实地评估工作。采取委派有资质、有能力、独立的第三方专家开展工作，采取包括但不限于审阅文件，如许可证、开采/生产记录、运输文件、销售记录、缴纳税费证明、员工花名册、劳务合同、工作时间、培训记录等，实地走访如走访矿区、原料库、生产设施、矿区围栏、运输、安保人员作业等、相关方访谈如与生产、销售、社区关系等管理层访谈、现场随机抽取员工访谈、访谈开采承包商、安保服务商等。通过采取以上措施，确保公司采购的含银原料符合 LBMA 的相关要求。

If it is found that silver containing materials may come from high-risk areas, immediately initiate an enhanced due diligence process, follow the company's risk mitigation management measures, and use tools such as the LBMA field visit form to conduct on-site assessments. Adopting qualified, capable, and independent third-party experts to carry out work, including but not limited to reviewing documents such as permits, mining/production records, transportation documents, sales records, tax payment certificates, employee

rosters, labor contracts, working hours, training records, etc., conducting on-site visits such as visiting mining areas, raw material warehouses, production facilities, mining fences, transportation, security personnel operations, conducting interviews with relevant parties such as management interviews with production, sales, community relations, randomly selecting employees on site, interviewing mining contractors, security service providers, etc. By taking the above measures, ensure that the silver containing raw materials purchased by the company meet the relevant requirements of LBMA.

供应链强化尽职调查流程如下：

Due diligence process for supply chain strengthening is as follows:

(1) 尽职调查过程中识别供应链中潜在的高风险后上报合规官。

(1) Identify potential high risks in the supply chain during the due diligence process and report to the compliance officer

(2) 合规官收集并整理好相关信息材料向合规总监汇报备案。

(2) The compliance officer collects and organizes relevant information materials to report to the compliance director for filing.

(3) 启动强化尽职调查工作，运用 LBMA 实地考察表，委派有资质的第三方开展工作并形成报告。

(3) Initiate enhanced due diligence work, utilize the LBMA site visit report, delegate qualified third parties to carry out the work and generate a report.

(4) 合规总监组织召开评审会议，判定该风险类型，并按照公司风险减缓管理办法采取措施减缓风险，决定是否继续交易、解除或暂停该供应链，并对这一决策制定过程做好记录。

(4) The compliance director organizes a review meeting to determine the type of risk and takes measures to mitigate the risk in accordance with the company's risk mitigation management measures. The decision is made whether to continue trading, terminate or suspend the supply chain, and the decision-making process is recorded.

2024 年度期间公司未出现高风险供应链，因此未触发强化尽职调查。

During the 2024 fiscal year, the company did not have any high-risk supply chains, therefore, no enhanced due diligence was triggered.

### 第三步：对已识别的风险实施管理策略

#### Step 3: Design and implement a management system to respond to identified risks

合规声明：

#### Compliance Statement with Requirement:

我们完全符合第三步：设计和实施一项管理策略应对已识别的风险

We have fully complied with Step 3: Design and implement a management system to respond to identified

risks.

公司严格遵守 LBMA 白银负责任指南第三步关于设计并实施策略来应对已识别的风险的要求。根据 2024 年的尽职调查结果，未发现供应商是高风险供应链，因此无供应商需要进行风险缓解的管理策略。

The Company strictly adheres to the third step of the LBMA Silver Responsible Guidelines regarding the design and implement a management strategy to respond to identified risks. As per the results of due diligence, no high risk were not identified and assessed in 2024, and no suppliers were required to adopt a management strategy for risk mitigation.

当公司发现供应商属于零容忍供应链或高风险供应链，则立即停止或暂停与对方的合作。当疑似高风险来料后，对其进行单独登记，并告知车间，对生产的成品金银单独编号，并其他成品白银分区域保存。针对涉及违反环境及可持续发展原则的来料，全部作为高风险来料，单独登记、熔炼、编号、分区域存放。

When the company discovers that the supplier belongs to a zero tolerance supply chain or a high-risk supply chain, it immediately stops or suspends cooperation with the other party. When suspected high-risk materials are received, they should be separately registered and the workshop should be informed. The finished gold and silver products produced should be numbered separately, and other finished silver products should be stored in different areas. All incoming materials that violate environmental and sustainable development principles shall be treated as high-risk materials, registered, melted, numbered, and stored separately in designated areas.

## 1、针对已识别的风险实施一项风险管理策略

### 1、A strategy for risk management of an identified risk

合规陈述：

Presentation of compliance:

公司根据风险评估确定了风险管理策略，主要通过以下三种方式进行风险管理策略：终止关系、暂停关系、维持关系。

The Company has determined risk management strategies based on risk assessment, mainly through the following three methods: terminating relationships, suspending relationships, and maintaining relationships:

#### 1.1 终止关系，规避风险

##### 1.1 Confirm Termination of Relationship and Avoid Risks

如果供应链尽职调查结果得出的结论是，存在洗钱、恐怖主义融资、严重的侵犯人权、直接或间接支持非法的政府武装组织或通过欺诈误导矿产品的原产地，我们将立即停止与该供应商交易，对已交易的贵金属数量进行核实并封存，上报至最高管理层，并根据国内外适用的法律要求，向有关部门报告

和 LBMA 此类情况。

If it is concluded from the results of enhanced due diligence on the supply chain that there is money laundering, terrorist financing, serious violations of human rights, direct or indirect support for illegal governmental armed organizations, or fraudulent misrepresentation on the origin of minerals, we will promptly cease trading with such suppliers while checking the quantity of precious metals traded, mothballing and reporting them to the top management, the Company shall report such situations to relevant departments and the LBMA in accordance with applicable domestic and foreign legal requirements.

## 1.2 暂停关系，同时降低风险

### 1.2 Confirm The Suspension Relationship and Reduce Risks During Suspending Transactions

如果强化尽职调查结果显示有理由怀疑供应商存在参与洗钱、恐怖主义融资、严重侵犯人权、直接或间接支持非国家武装团体、对矿石来源进行虚假陈述以及灾难性 ESG 影响的情况，公司应暂缓从供应商处采购原料，直到获取更多的信息和证据。一旦供应商提供了反驳初步怀疑的补充信息/数据，或对解决 ESG 影响作出了及时和适当的反应，经过合规总监批准后可以恢复进行。

If the results of the enhanced due diligence show reasonable suspicion that the supplier is involved in money laundering, terrorist financing, serious human rights violations, direct or indirect support for non-state armed groups, false statements about ore sources, and catastrophic ESG impacts, the Company should temporarily suspend the procurement of raw materials from the supplier until more information and evidence are obtained. Once the supplier provides supplementary information/data to refute initial suspicions or responds promptly and appropriately to address ESG impacts, it can be resumed with the approval of the Compliance Director..

## 1.3 保持与改进计划的关系，在继续交易的同时降低风险

### 1.3 Confirm that The Relationship with The Improvement Plan is Maintained to Reduce Risks During Continuing The Transaction.

如果强化尽职调查结果显示未发现潜在问题或存在少量问题，包括贿赂、对矿物来源进行非欺诈性虚假陈述、不缴纳应付给政府的税费和特许权使用费、严重违反环境、健康、安全、劳动和社区相关地方立法或极有可能造成高度不利影响的 ESG 风险时，供应商能提供包含明确改进计划和时间表的风险解决方案，并经合规专员审核、合规总监批准后公司可以与该供应商开展正常合作关系。风险解决方案应包含明确绩效目标、基于定量和定性分析的绩效评估指标和合理的完成日期。

If enhanced due diligence reveals no potential issues or a small number of issues, including bribery, non fraudulent false statements about mineral sources, failure to pay taxes and royalties payable to the government, serious violations of environmental, health, safety, labor, and community related local legislation, or ESG risks that are highly likely to have a highly adverse impact, the supplier can provide a risk solution that includes clear improvement plans and timelines, and after review by the compliance officer and approval by the compliance director, the Company can establish a normal cooperative relationship with the supplier. The risk

solution should include clear performance goals, performance evaluation indicators based on quantitative and qualitative analysis, and reasonable completion dates.

不存在洗钱、恐怖主义融资、严重的侵犯人权、直接或间接支持非法的政府武装组织或通过欺诈误导矿产品的原产地等零容忍问题，未违反环境、健康、安全、劳动和社区相关地方立法或未造成不利影响的 ESG 风险，并且提供了所有的相关尽职调查的资料，通过风险评估，结论为非高风险供应商，则继续进行交易，并定期对其进行风险监控。

If there are no zero-tolerance problems, such as money laundering, terrorist financing, serious violations of human rights, direct or indirect support for illegal governmental armed organizations, or fraudulent misrepresentation on the origin of minerals, non-violation of environmental, health, safety, labor, and community related local legislation, or ESG risks that have not caused adverse effects, and all materials related to due diligence are provided with the results of risk assessment showing that it is a non-high-risk supplier, it is required to continue trading and carry out risk monitoring on a regular basis.

## **2、量化措施，绩效监督，重新评估以及定期汇报**

### **2、Measurable steps, monitoring of performance, periodic reassessment, regular reporting to designated senior management.**

合规陈述：

Presentation of compliance:

本着诚信友好的原则，公司在与供应商保持合作关系，执行改进计划时，对供应商采取量化措施，绩效监督，重新评估以及定期汇报等措施。

Based on the principle of honesty and friendliness, measures such as Measurable steps, monitoring of performance, periodic reassessment, regular reporting to designated senior management were taken against suppliers when the Company maintained relationships with suppliers and implemented improvement plans.

量化手段和绩效评估：根据《LBMA 风险缓解策略》，如果尽职调查的结果处于低风险，但仍存在轻微不符合时，只要该公司在规定的时间内采取了明确绩效目标的改进策略，我们将继续从其处获取白银原材料。如果白银供应链尽职调查提交的资料不完善，或者不愿意配合的，这说明存在洗钱、恐怖主义融资、助长冲突、侵犯人权的行为可能性很高，我们将立即停止从其处获取白银原材料，直到其他信息或数据能证实其低风险。改进应该在六个月内完成，截止计划时间，根据实施整改情况进行评估，采用独立审计、现场访问等方式，为促进监测整改情况，可酌情咨询利益相关者，如地方政府机构、上游公司以及受影响的第三方，充分利用网络优势。如发现改进有限或没有可衡量的改进予以证明时，暂停合作，直到供应商响应改进计划，如降低风险和改进失败后终止合作。根据 2024 年的尽职调查结果，并未出现供应商需要进行风险缓解的管理策略。所有供应商的合作都是持续而良好，并未出现终止、暂停关系的供应商。



Measurable steps and performance evaluation: In accordance with the *LBMA Risk Mitigation Strategy*, if the results of due diligence show that it is at low risk but there are still minor non-conforming items, we will continue to refine silver materials coming from this source provided that it adopts an improvement strategy stating clear performance objectives within the specified time. In case of incomplete information provided for the due diligence on silver supply chain or suppliers unwilling to cooperate with due diligence, which indicates that there is a high possibility of money laundering, terrorist financing, furtherance of conflicts or violations of human rights, we will stop immediately to refine silver materials from this source, until there is additional information or data available for confirming that it is at low risk. Improvements should be completed within six months by the planned deadline. Based on the implementation of the rectification measures, an evaluation will be conducted using independent audits, on-site visits, and other methods. To facilitate monitoring of the rectification situation, stakeholders such as local government agencies, upstream companies, and affected third parties may be consulted as appropriate, fully utilizing the advantages of the internet. If limited improvement is found or there is no measurable improvement to prove, cooperation will be suspended until the supplier responds to the improvement plan. If risk reduction and improvement failure occur, cooperation will be terminated. According to the due diligence results for 2024, there is no need for suppliers to implement risk mitigation management strategies. The cooperation between all suppliers is continuous and good, and there have been no suppliers who have terminated or suspended their relationships.

定期重新评估与持续监控：1、每年，原料采购部门的合规专员组织人员收集供应商信息的所有变更情况，持续监控交易结果并进行年度供应链尽职调查重新评估，以决定是否继续合作。2、采购的每一批次的白银原料在运输、出入库、仓储、生产、付款过程都有合规专员的监控，其中出入库必须有押运 LBMA 合规专员的签字，付款必须有财务的 LBMA 合规专员的审批与合规总监批准。

Periodic reassessment and continuous monitoring: 1. The Compliance Officer in the Raw Material Purchase Department shall organize personnel to collect all changes to suppliers' information, continuously monitor the results of transactions, and conduct the reassessment of annual due diligence on the supply chain to decide whether to continue cooperation every year. 2. Each batch of silver materials purchased shall be monitored by the Compliance Officer in the process of transportation, warehousing, storage, production and payment. The warehousing must be signed by the LBMA Escort Compliance Officer, and the payment must be approved by the LBMA Financial Compliance Officer and reported to the Compliance Director for approval.

定期报告：每季度合规专员根据 LBMA 管理的实际情况，向合规总监和最高管理层提交汇报。报告本季度 LBMA 管理体系运行情况进行总结，发扬优良的风险评估方式方法，提出不足及改进措施。

Regular reporting: The Compliance Officer shall quarterly submit reports to the Compliance Director and the top management in accordance with the actual situation of LBMA management. The operation of LBMA management system in this quarter shall be reported for summarization. We will carry forward excellent risk

assessment practices. Moreover, deficiencies and improvement measures shall be brought forward.

2024 年，公司采取了量化的手段对供应商进行评分管理，对除所有供应商进行年度风险评估，合规总监已对评估结果进行审核，并且向最高管理层报告。

In 2024, the Company took measurable steps to score and manage suppliers, and carried out annual risk assessment for all suppliers. The Compliance Director reviewed the results of assessment. Moreover, reports were submitted to the top management.

#### 第四步：安排独立的第三方审计

##### **Step 4: Arrange for an independent third-party audit of the supply chain due diligence**

合规声明：

##### **Compliance Statement with Requirement:**

我们完全符合第四步：安排独立的第三方审计

We have fully complied with Step 4: Arrange for an independent third-party audit of the supply chain due diligence.

合规陈述：

##### **Presentation of compliance:**

公司严格遵守 LBMA 白银责任指南第四步“对精炼商的尽职调查实践开展独立的第三方审计”的要求，必维认证以其独立性、公正性和专业性而闻名，其合理鉴证业务按照国际标准执行，基于以上考虑公司委托必维认证（北京）有限公司上海分公司进行合理鉴证，上一年度的第三方独立审计中均无中高风险提出，对于审计中发现的问题，均已整改完毕，问题已关闭，审计报告在年度审计完成后在公司官网（<http://www.jxccqx.com/news/show/127>）进行公布。

The Company strictly abided by the requirements of “ arrange for an independent third-party audit of the refiner due diligence” in Step 4 of LBMA Responsible Silver Guidance. Bureau Veritas Certification is renowned for its independence, impartiality, and professionalism, in accordance with international standards in the assurance business in the implementation of a reasonable assurance business, based on the above considerations, the Company continued to entrust Bureau Veritas Certification (Beijing) Co., Ltd. Shanghai Branch to conduct reasonable authentication, In the independent third-party audit conducted last year, no medium-risk and high-risk issues were identified. All issues discovered during the audit have been rectified and closed, the audit report will be posted on the official website of the Company after the annual audit was completed（<http://www.jxccqx.com/news/show/127>）.

#### 第五步：供应链尽职调查报告

##### **Step 5: Report on supply chain due diligence**

合规声明：

Compliance Statement with Requirement:

我们完全符合第五步：供应链尽职调查报告

We have fully complied with Step 5: Report on supply chain due diligence

合规陈述：

Presentation of compliance:

公司根据 LBMA 负责任的白银指南制定了《江西铜业铅锌金属有限公司白银尽职调查合规报告（2024 年）》，报告中详细列出了有关如何实施供应链尽职调查政策，程序，过程和控制以符合 LBMA 负责任白银指南，并在公司网站（<https://www.jxccqx.com/>）予以公示。

The Company has prepared the "Jiangxi Copper Lead & Zinc Metal Co., Ltd Due Diligence Management Compliance Report of Silver Supply Chain in 2024" in accordance with LBMA Responsible Silver Guidance, the report provides a detailed list of how to implement supply chain due diligence policies, procedures, processes, and controls to comply with the LBMA Responsible Silver Guidance, and has made it public on the Company's website (<https://www.jxccqx.com/>) .

### 三、结论

#### III. Conclusion

公司在截至 2024 年 12 月 31 日的年度报告中，通过供应链尽职管理体系，实施了尽职调查管理政策，识别和评估了供应链相关风险，实施风险管理策略，对供应链尽职调查工作进行了独立的第三方审计，及时编制了供应链尽职调查报告，因此，公司持续遵守了 LBMA 负责任的白银指南。

The Company established and improved a supply chain due diligence management system, identified and evaluated supply chain related risks, designed and implemented risk management strategies, and conducted independent third-party audits of supply chain due diligence work in the annual report submitted as of December 31, 2024, and prepared a supply chain due diligence report. Therefore, the Company has fully complied with the LBMA Responsible Silver Guidance.

在未来的工作中，公司致力于在现有白银供应链尽职调查制度的基础上持续改善，并将负责任的白银供应链流程与公司相应制度更有机地结合起来，并且将定期对内部发现的所有纠正措施进行监控。

In future work, the Company will be committed to continuous improvement on the basis of the existing due diligence system for the silver supply chain, and will more effectively integrate responsible silver supply chain processes with the Company's corresponding systems. Any identified corrective actions will be monitored internally on a regular basis.

#### 四、其他

#### **IV. Others**

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