



江西铜业铅锌金属有限公司  
JIANGXI COPPER LEAD & ZINC METAL CO., LTD.

江西铜业铅锌金属有限公司  
**JIANGXI COPPER LEAD & ZINC  
METAL CO., LTD**  
LBMA 负责任白银供应链尽职调查  
**Due Diligence on LBMA Responsible  
Silver Supply Chain**  
管 理 体 系  
**Management System**

2025 年 12 月 15 日 修订  
Amended on December 15, 2025

2025 年 12 月 15 日 实施  
Implemented on December 15, 2025

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## 一 总则

### General Provision

为确保公司白银供应合法合规，建立透明的白银供应链，以及公司可持续参与国际白银供应并获得利益，防止因白银供应引发冲突、侵犯人权和造成不稳定等，明确公司白银供应链管理过程中的职责、管理活动的内容与方法，特制订本管理办法。

These management measures have been formulated to ensure the legal compliance of the Company's silver supply, the establishment of a transparent silver supply chain, and the Company's sustainable participation in and benefits from the international silver supply, as well as the prevention of conflicts, human rights violations, and destabilization arising from the supply of silver, among other things. The Standard specifies the responsibilities, contents and methods of management activities in the silver supply chain management process of JIANGXI COPPER LEAD & ZINC METAL CO., LTD.

## 二 适用范围

### Scope of application

本标准适用于江西铜业铅锌金属有限公司及与江西铜业铅锌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）。

The Standard applies to JIANGXI COPPER LEAD & ZINC METAL CO., LTD as well as all silver suppliers and silver-related partners (including silver producers, distributors, silver traders, exporters and carriers) who have silver transactions with and provide silver processing for JIANGXI COPPER LEAD & ZINC METAL CO., LTD.

## 三 定义和术语

### Definitions

本制度中涉及的术语和定义均采用《LBMA 负责任白银指南》第二版所确立的内容，常见定义和术语如下：

The terms and definitions covered in this system are adopted as established in the London Bullion Market Association (LBMA) Responsible Silver Guidance(Second Edition).

了解客户或供应商 (KYC)：这是企业识别和核实其供应商的身份、确定事实并对关系的性质和背景形成明确认知的流程。

**KYC: This is the process of a business identifying and verifying the identity of its counterparts and establishing the facts to have a clear understanding of the nature and background of the relationship.**

受冲突影响和高风险地区 (CAHRA)：该地区存在武装冲突、普遍暴力或其他对人民造成伤害的风险。武装冲突可以采取多种形式，如国际或非国际性质的冲突，可能涉及两个或两个以上的国家，也可能包括解放战争、叛乱战争、内战等。高风险地区

可能包括政治不稳定或受到压制、体制薄弱、不安全、民用基础设施崩溃和普遍暴力的地区。这些地区的特点往往是普遍存在侵犯人权和违反国内法或国际法的现象。  
**CAHRA:** These areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law.

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

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

**白银供应链:** 向公司供应铅精矿、银精矿、锌精矿、金精矿、阳极泥等白银生产所需含银物料的供应商以及白银产品销售的客户。

**Silver supply chain:** suppliers of silver-containing materials needed for silver production such as lead concentrate, silver concentrate, zinc concentrate, gold concentrate and anode slime, as well as customers of silver products.

**世界遗产地:** 联合国教育、科学及文化组织（“教科文组织”）选定的具有文化、历史、科学或其他重要意义并受国际条约法律保护的地标或地区。这些遗址被认为对人类的集体利益很重要。

**World Heritage Site:** A landmark or area which is selected by the United Nations Educational, Scientific and Cultural Organization (UNESCO) as having a cultural, historical, scientific or other form of significance, and is legally protected by international treaties. The sites are judged important to the collective interests of humanity.

**官方库存:** 存放于白银银行金库、中央银行金库、交易所和精炼商且可核查日期为2018年1月1日前的白银投资产品（银锭、银条、银币和银粒，存放于密封容器），该等白银不需要确定其来源。

**Grandfathered Stocks:** Silver investment products (e.g., ingots, bars, coins and grain in sealed containers) held in bullion bank vaults, central bank vaults, exchanges and refineries, with a Verifiable Date prior to 1 January 2018, which will not require a determination of origin. This includes stocks held by a third party on behalf of the listed entities.

**最终实益人:** 指最终拥有或控制客户的自然人及/或交易乃代表其开展的自然人，还包括那些对法人或安排行使最终有效控制权（定义为10%或以上的所有权）的人士。  
**Ultimate Beneficial Owner:** Refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement (defined as 10% or more ownership).

ASM: 手工和小规模开采。

ASM: Artisanal and Small-Scale Mining

EDD: 加强型尽职调查。

EDD: Enhanced Due Diligence

ESG: 环境、社会和治理。

ESG: Environment, Social and Governance

EITI: 采掘业透明度倡议。

EITI: Extractive Industry Transparency Initiative

LBMA: 伦敦金银市场协会。

LBMA: London Bullion Market Association

LSM: 大规模开采。

LSM: Large-Scale Mining

## 四 白银供应链尽职调查政策

### Silver Supplier Due Diligence Management Policy

江西铜业铅锌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 供应链尽责调查管理指南，并按照其要求建立白银供应链尽职调查管理体系，积极推行白银供应链尽职调查工作，确保白银供应链严格遵守 OECD（附录二）与《LBMA 负责任白银指南》第二版的要求。我们将严格禁止供应链有如下行为：

JIANGXI COPPER LEAD & ZINC METAL CO., LTD strictly abides by the state's various laws and regulations on employee rights, environmental protection and other laws and regulations, actively participate in the investigation of LBMA supply chain to fully implement the "OECD's dedication to supply chain in conflict areas and high-risk areas, and the LBMA supply chain responsibility investigation guidelines, has established a management system for due diligence on silver supply chain as required to actively promote the silver supply chain due diligence work, thus ensuring that the silver supply chain meets the requirements of Annex II of OECD and the LBMA Responsible Silver Guidance. We will strictly prohibit the following activities in the supply chain:

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 the use of child labor, torture, inhuman and degrading treatment, extensive use of violence or other forced labor concerning serious violation of human rights, 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 groups or to public or private security forces that illegally control mines, traders, other intermediaries, transport routes through the supply chain, or illegally imposing taxes or extorting money or minerals throughout the supply chain (“illegal armed groups, public or private security forces”);

3. 通过贿赂或欺诈掩盖白银原产地；

3. Concealing the origin of silver by means of 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. Non-compliance with taxes, fees, royalties due to governments related to mineral extraction, trade and export 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 activities, such as weapons, gambling, antiques and works of art, sects and their leaders;
8. 受益人是政治敏感人物或通缉人员;
8. The beneficiary is a politically sensitive person or a wanted person;
9. 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。
9. Not complying with the legitimate requirements of environmental protection and sustainable development, violation of environment, health, safety, labor and community related legislation.
10. 开采银来自被指定为世界遗产地的地区。
10. Mining Silver comes from areas designated as World Heritage Sites.

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

If such behavior is found in the supply chain, we will take measures to isolate the purchased products and immediately suspend or discontinue any transaction with the supplier.

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

We will assess the supply chain risks on a regular basis according to the requirements of the management system, and establish the management files for supplier due diligence, so as to ensure that the supply chain continues to meet the requirements of the LBMA Responsible Silver Guidance.

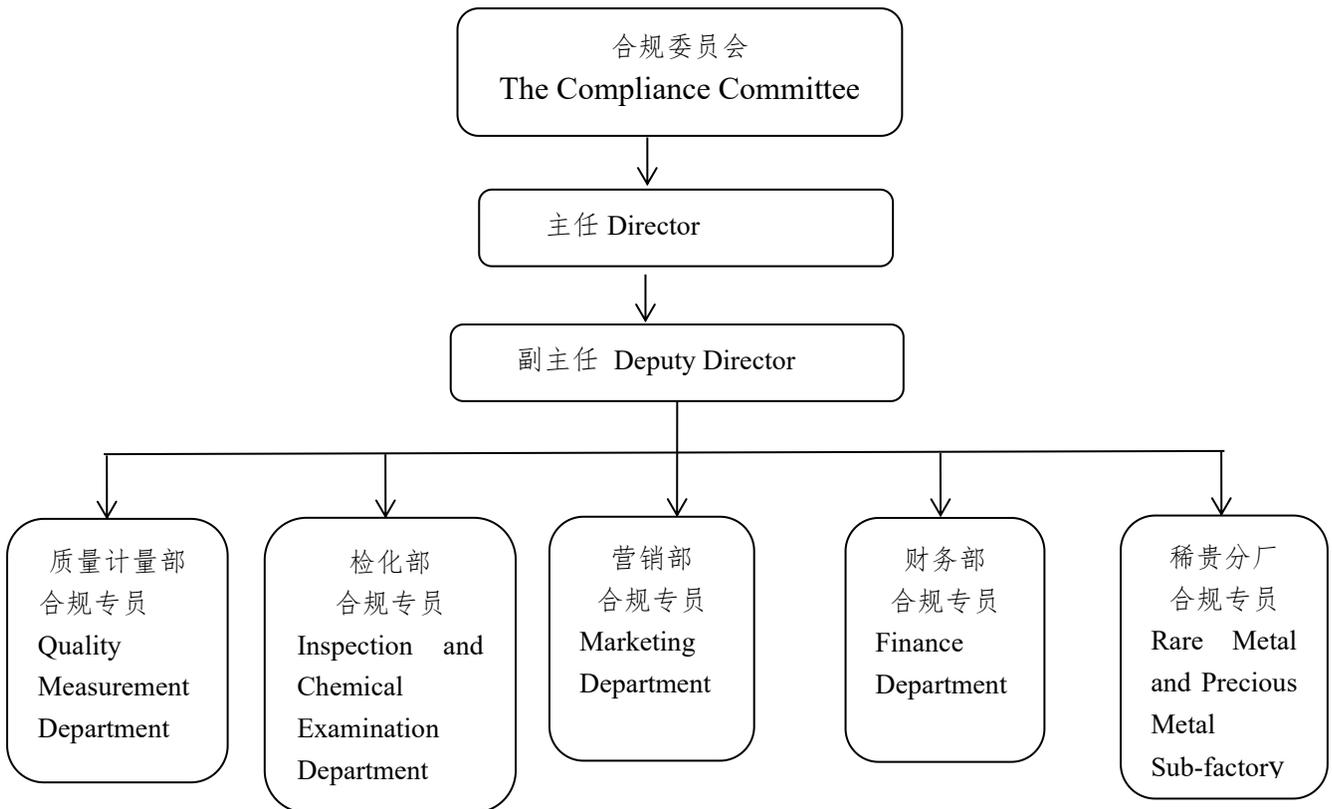
## 五 组织架构和职责

### Organizational structure and responsibilities

1 江西铜业铅锌金属有限公司为白银供应链尽职调查设立了专门的管理团队, 组织结构如下:

1 JIANGXI COPPER LEAD & ZINC METAL CO., LTD has set up a special management team for the due diligence on silver supply chain, with the organizational structure shown as follows:

## 白银管理组织架构



按照 LBMA 尽职管理工作要求和业务开展实际需要，特设置江西铜业铅锌金属有限公司白银供应链尽职管理组织机构，合规委员会。

In accordance with the requirements of LBMA due diligence management work and the actual needs of business development, we hereby set up the Silver Supply Chain Due Diligence Management Organization, The Compliance Committee of JIANGXI COPPER LEAD & ZINC METAL CO., LTD

江西铜业铅锌金属有限公司合规委员会：

**The Compliance Committee:**

主任：总经理

**Director:** General Manager

副主任：生产副总、合规总监

**Deputy Director:** Deputy General Manager, Compliance Director

委员：各部门负责人

**Committee Members:** Heads of Departments

江西铜业铅锌金属有限公司合规委员会是公司推行 LBMA 白银采购尽职管理体系的领导和决策机构，其主要职责：

**The Compliance Committee of JIANGXI COPPER LEAD & ZINC METAL CO., LTD is the leading and decision-making organization of the Company to implement the LBMA Silver Procurement Due Diligence Management System:**

(1) 根据 LBMA 负责的白银指南制定本公司白银采购尽职管理相关的政策、制度，指导日常供应链尽职调查，监督洗钱、高危地区采购等风险管理及应对措施的实施，监督、检查公司白银采购尽职管理体系和管理标准的建立，发现并纠正日常管理体系和管理标准不足之处，并定期更新。

(1) Based on the content of the LBMA Responsible Silver Guidance, we formulate policies and regulations related to the due diligence management of the Company's silver purchases, guide the daily due diligence, supervise the implementation of risk management and countermeasures such as money laundering and purchasing in high-risk areas, and identify and correct the establishment of daily management systems and management standards, which are regularly updated.

(2) 负责进行风险调查、识别、评估、应对等尽职管理工作，并在公司层面做最终确认。

(2) Responsible for conducting due diligence management work such as risk investigation, identification, assessment, and response, and making final confirmation at the company level.

(3) 负责解决尽职调查管理体系实施和运行中所需资源和出现的问题。

(3) Responsible for addressing the resources required and issues arising during the implementation and operation of the due diligence management system.

## 2 职责：

### 2 Responsibilities:

#### 2.1 合规总监

公司高级管理者刘湖滨（副总）对外负责根据我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。对内负责根据 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。做好白银供应链规则的起草、更新、审批工作。

#### 2.1 Compliance Director

From the external perspective, the senior management is in charge of the examination and approval of cooperation contracts with suppliers (including whether to sign cooperation contracts with high-risk suppliers) according to the Company's raw material procurement policy and the actual production, financial and sales conditions, as well as in charge of matters related to reviewing the suppliers. From the internal perspective, the senior management is responsible for the training of the relevant employees according to the LBMA Responsible Silver Guidance, so that the relevant responsible persons can clearly understand the purpose and significance of the system, figure out their responsibilities in the implementation of due diligence policies, and training is needed on a semi-annual basis to review the relevant contents. Ensure the drafting, updating, and approval of silver supply chain rules.

#### 2.2 合规经理

营销部主任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。

#### 2.2 Compliance Manager

The Compliance Manager is responsible for assisting senior management in taking

comprehensive responsibility for due diligence on silver supply chain, and for all matters concerning the silver supply chain, so as to ensure that appropriate measures are taken in high-risk supply chains or transactions with risk assessment reports submitted. Meanwhile, the Compliance Manager has the obligation to conduct training on responsible supply chain, and formulate and update silver supply chain policies, thus providing accurate information for senior managers to fulfill their responsibilities.

(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 Manager has the right to monitor the due diligence process on silver supply chain and evaluate whether the due diligence is fully carried out; he/she also has the right to request additional documents or information when necessary.

(2) 如果存在高风险供应链或交易，需要及时向业务分管副总汇报。

(2) The Compliance Manager is required to make a timely report to the Vice President in charge of such business for any high-risk supply chain or transaction.

(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) The Compliance Manager is responsible for regular training for employees on silver supply chain rules, formulating and updating silver supply chain rules, so as to offer accurate information for senior management to fulfill their responsibilities.

(4) 每年至少一次对重要客户进行现场调查；

(4) The Compliance Manager is responsible for conducting on-site investigation on important customers at least once a year;

(5) 协助与鼓励含银原料供应商及白银交易客户承诺遵守白银供应链尽职规则；

(5) The Compliance Manager is responsible for assisting and encouraging silver-containing raw material suppliers and silver trading customers to promise to follow the due diligence rules of silver supply chain;

(6) 如出现异常情况需及时向合高级管理者报告。

(6) The Compliance Manager is required to make a timely report to the senior managers responsible for compliance for any abnormality.

### 2.3 合规成员

合规成员由营销部、质量计量部、稀贵分厂、检化部、财务部合规专员组成，协助高级管理人员全面负责白银供应链尽职调查事务，协助起草和更新白银供应链政策，并将年度合规情况向合规经理报告，为高级管理者履责提供准确的信息，日常工作中如出现异常情况需及时向业务分管领导及合规经理报告。

### 2.2 Compliance Officers

Compliance Officers: Quality Measurement Department Representative, Inspection and Chemical Examination Department Representative, Marketing Department Representative, Finance Department Representative, Rare Metal and Precious Metal Sub-factory Representative. They assist senior management in taking full responsibility for due diligence on the silver supply chain, assist in drafting and updating silver supply chain policies, and report annual compliance status to the compliance manager, providing accurate information for senior managers to fulfill their responsibilities. In daily work, if any abnormalities occur, they must promptly report to the business leaders in charge and

the compliance manager.

2.3.1 营销部负责原材料采购，确保矿粉、原材料供应的长期性、稳定性、安全性，如果存在高风险供应链或交易等异常情况，需要及时向分管领导及合规经理报告。并拒绝与高风险地区的相关企业、组织或国家合作。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、采购合同、供应商承诺书等。每年至少一次对重要客户进行走访调查。

2.3.1 The Marketing Department is responsible for purchasing raw materials to guarantee the long-term, stable and safe supply of mineral powder and raw materials, If there are abnormal situations such as high-risk supply chains or transactions, it is necessary to promptly report to the responsible leader and compliance manager. Refuse to cooperate with relevant enterprises, organizations, or countries in high-risk areas. Be responsible for collecting and preserving sufficient supporting documents for import and export supply chains, such as supplier business licenses, procurement contracts, supplier commitments, etc. Conduct visits and investigations of important customers at least once a year.

2.3.2 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；做好银锭质量监督检查工作，制定培训计划，采用线下或线上方式对合规成员组织培训，学习 LBMA 负责任白银指南的相关内容，准确掌握公司负责任白银管理的相关政策，每年至少一次。

2.3.2 The Quality Measurement Department is responsible for weighing and recording the purchase of silver-containing raw materials, maintaining inventory records, conducting quality supervision and inspection of silver ingots, developing training plans, and organizing training for compliant members through offline or online methods. The training covers relevant content from the LBMA's Responsible Silver Guidelines, ensuring accurate understanding of the company's responsible silver management policies, at least once a year.

2.3.3 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。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。

2.3.3 Rare Metal and Precious Metal Sub-factory 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.

2.3.4 检化部负责对采购含银原料进行化验，要确保检测白银纯度的准确性。

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

2.3.5 财务部负责完整保存所有客户的交易凭证。交易应通过官方银行等渠道，不应进行任何现金交易，确保交易安全性，采用监督机制保证公司不参与恐怖主义融资、交易等。

2.3.5 The Finance Department is responsible for maintaining complete transaction records for all customers. Transactions should be conducted through official banking channels and no cash transactions should be allowed, ensuring transaction security. A

monitoring mechanism should be employed to ensure that the company does not engage in terrorist financing, transactions, etc.

## 六、识别及评估供应链风险

### Recognize and evaluate the risk of supply chain

供应链尽职调查遵循基于风险评估的方法进行，包括绘制供应链地图以有效识别和评估风险。公司与白银供应商建立新的业务关系之前及在保持关系期间，必须进行尽职调查。

Following a supply chain due diligence based on an assessed risk approach, due diligence must be performed prior to entering a new business relationship with a silver supplier counterparty and during the maintenance of the relationship.

#### 1 供应链尽职调查

供应链尽职调查应从评估所采购的含银材料的位置、供应链、含银材料类型三个方面的风险。

#### 1 Carry out the supply chain to investigate

Dyeing investigations are carried out from the three dimensions of positions, supply of counterparty, and raw materials.

##### 1.1 位置风险识别：

##### 1.1 Location risk recognition:

1.1.1 确定白银的来源，并及时记录来源类别：矿物银、回收银、采矿副产品和官方库存。

1.1.1 Determine the source of silver and promptly record the source category: mineral silver, recycled silver, mining by-products, and Grandfathered Stocks.

1.1.2 确定白银来源及从产地到精炼厂的一般运输路线，以及参考制裁名单(联合国及相关制裁名单等)、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文件、金融行动工作组 (FATF) 报告 (包括相关国家/地区报告)、高风险白银中心/转运中心和洗钱风险高的国家/地区等的可靠市场情报。核实矿山并非位于世界遗产地。

1.1.2 Determine the origin or pathway of silver by referring to international sanctions lists recognized by the Chinese government, Section 1502 of the Dodd-Frank Act, the EU CAHRA list, the Heidelberg Barometer, the Fragile States Index or similar, the Office of the United Nations High Commissioner for Human Rights (OHCHR) or its equivalent, reports from the Financial Action Task Force (FATF) (including relevant country/region reports), reliable market intelligence on high risk silver centers/transit centers and high money laundering risk countries/regions. Verify that the mine is not located in a World Heritage site.

##### 1.2 供应商风险识别：

##### 1.2 Supplier risk recognition:

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商的名称、实际地址、公司注册和许可证信息。

Utilize the KYC questionnaire provided in the toolkit to conduct risk identification on suppliers, encompassing but not limited to: utilizing credible and independent sources of documents, data, or information to identify and verify the name, physical address, company registration, and licensing information of silver suppliers.

识别和确认白银供应方及其最终受益人且未被列入任何政府通缉的洗钱者名单或已知的诈骗或恐怖分子名单。

Identify and confirm the suppliers of silver and their ultimate beneficiaries, who are not included in any government-issued money launderer lists or known fraudster or terrorist lists.

了解供应商的业务和财务信息，预判有关业务关系的目的。

Gain an understanding of the supplier's business and financial information, and anticipate the purpose of the relevant business relationship.

### 1.3 材料类型风险识别：

#### 1.3 Identify material type risks

##### 1.3.1 来自 LSM 开采银的风险识别应包括但不限于：

白银供应商的白银进出口许可证(如适用)、采矿作业（包括加工和运输方法）、生产数据及加工能力（如可用）、第三方库存的来源及管控措施、反洗钱和恐怖主义融资政策和实践（若相关）、贿赂和腐败政策和实践（包括向政府付款）、人权政策和实践、环境政策和实践、健康和安全管理政策和实践、劳动政策和实践（若未通过其他政策涵盖）、社区参与计划、道德及商业诚信政策和实践。

##### 1.3.1 The risk identification for silver mining from LSM should include, but not be limited to:

Silver suppliers' silver import and export licenses (if applicable), mining operations (including processing and transportation methods), production data and processing capabilities (if available), sources and control measures of third-party inventory, anti-money laundering and terrorist financing policies and practices (if relevant), bribery and corruption policies and practices (including payments to the government), human rights policies and practices, environmental policies and practices, health and safety policies and practices, labor policies and practices (if not covered by other policies), community engagement plans, ethics and business integrity policies and practices.

##### 1.3.2.来自 ASM 开采银的风险识别应包括但不限于：

使用精炼商工具包中的 KYC 调查问卷，获取、评估以下信息并在可能的情况下

根据公开可用信息进行验证，识别风险：

##### 1.3.2 The risk identification for silver mining from ASM should include, but not be limited to:

Using the KYC Questionnaire in the Refiners Toolkit, identification of risks by obtaining, assessing and, where possible, verifying against publicly available information:

(1) ASM 白银来源的供应商，包括 a.当地的手工采矿队、协会或合作社（不需要确认个别挖掘者），b.矿石加工厂，c.汇集商及交易商，d.当地白银出口商；

(1) Suppliers of ASM silver sources, including: Local artisanal mining teams, associations or cooperatives (no need to identify individual diggers). Ore processing plant. Aggregators and traders. Local silver exporter.

(2) 采矿项目是否可以被认为是合法的 ASM;

(2) Whether the mining project can be considered a legitimate ASM

(3) 采矿作业 (包括提取、加工和运输方法);

(3) Mining operations (including extraction, processing and transportation methods).

(4) 汞的使用、储存和回收, 以及(如适用)对环境和参与白银生产、处理和加工的人员的健康的影响;

(4) The use, storage and recycling of mercury and, if applicable, the effects on the environment and on the health of persons involved in the production, handling and processing of silver.

(5) 人权、环境、健康和安全、劳动、社区参与的实践和政策 (若适用)。

(5) Practices and policies related to human rights, environment, health and safety, labor, and community engagement (if applicable).

1.3.3. 再生银的风险识别应包括但不限于:

1.3.3. Risk identification for Recycled Silver should include, but is not limited to:

使用精炼商工具包中的回收材料 KYC 调查问卷, 获取、评估以下信息并在可能

的情况下根据公开可用信息进行验证, 白银供应商的主要市场、产品和客户细分、白银供应商的资料、采购白银的种类和形式、经营的设施类型及地点, 进口/出口许可证 (如适用)、反洗钱和恐怖主义融资政策和实践、反贿赂与反腐败政策和实践、负责任采购政策和实践。

Utilize the KYC Questionnaire for Recycled Material in the Refiners Toolkit, identification of risks by obtaining, assessing and, where possible, verifying against publicly available information: the main market, product and customer segmentation of silver suppliers, information about silver suppliers, types and forms of silver purchased, types and locations of operating facilities, import/export licenses (if applicable), anti-money laundering and terrorism financing policies and practices, anti-bribery and anti-corruption policies and practices, responsible procurement policies and practices.

## 2 风险评价标准

公司将供应链分为零容忍供应链、高风险供应链、低风险供应链。

### 2 Classification of Supply Chains

According to the risk status identified in the due diligence investigation, the Company supply chain is categorized into zero tolerance supply chain, high risk supply chain and low risk supply chain.

2.1 零容忍: 来自被指定为世界遗产或保护区的地区、违反国际制裁 (中国政府承认) 的国家, 供应方、其他已知的上游或其最终受益人都是已知的洗钱、诈骗或恐怖分子, 涉嫌与直接或间接支持非法活动的非国家武装组织, 严重侵犯人权, 以及对矿产来源的欺诈性虚报。

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

2.1 Zero-tolerance: Silver comes from regions designated as world heritage or protected areas, countries that violate international sanctions (recognized by the Chinese

government). Supply counterparties or their ultimate beneficiaries were known money launderers, fraudulent or terrorist, the supplier or its ultimate beneficiary is a known money laundering, fraud or terrorist, suspected of directly or indirectly supporting non-state armed organizations engaged in illegal activities, seriously violating human rights, and fraudulently falsifying mineral sources.

Once a zero tolerance issue is identified, the Company shall not establish a business relationship with a silver supply counterparty or immediately terminate the existing relationship and notify the LBMA.

## 2.2 高风险供应链:

### 2.2.1 开采银的高风险问题包括但不限于:

#### 2.2 High-Risk Supply Chain Assessment Criteria:

##### 2.2.1 High-risk issues for mining silver shall include but are not limited to:

(1) 基于位置的高风险开采银

a) 来自受冲突影响和高风险地区(CAHRA)或曾在该等地区过境或通过该等地区运输;

b) 据称来自已知或合理怀疑来自 CAHRA 的白银过境的地区;

c) 据称来自已知储量、可能资源或预期产量有限的国家/地区;

(1) Location High Risk: Silver mined originates from, or transited/transported through CAHRA, is alleged to have originated from countries where silver is known or reasonably suspected to have originated from the transit of silver through CAHRA, and is alleged to have originated from countries with limited known reserves, probable resources, or expected production

(2) 基于供应商的高风险, 白银供应商或其他已知的上游公司:

a) 具有符合基于位置高风险标准的股东或最终受益人 或其他白银供应权益

b) 具有身为政治人物的最终受益人

c) 从事高风险商业活动 (如军火、赌博和娱乐业、古董和艺术、教派及其领袖)

d) 已知在过去一年曾从高风险国家/地区采购白银

e) 提供的文件有重大差异/不一致, 或拒绝提供所要求的文件。

Supplier High Risk: Silver supplying counterparty or other known upstream company has shareholders or UBOs or other silver supplying interests that meet location-based high risk criteria, has UBOs that are PEPs, is engaged in high risk business activities (e.g., arms, gaming and entertainment industries, antiques and art, denominations and their leaders), is known to have purchased silver in the past 12 months from a high risk country/region, has provided significant discrepancies/inconsistencies or refuses to provide requested documentation

(3) 基于材料类型的高风险开采银:

a) 采购自 ASM

b) 使用汞生产

c) 造成灾难性伤害或高度不利的 ESG 因素 (精炼商能够识别的范围) (如通过公共领域的记录或精炼商的尽职调查文件)。

(3) Material Type High Risk: Silver mined or sourced as a by-product of mining from ASM, produced using mercury, causing catastrophic injury without appropriate mitigation, or highly adverse ESG factors

2.2.2 再生银的高风险问题应包括但不限于：

2.2.2 High risk issues for recycled silver shall include but not be limited to:

(1) 基于位置的高风险再生银

- a) 来自受冲突影响和高风险地区(CAHRA)或曾在该等地区过境或通过该等地区运输；
- b) 据称来自已知或合理怀疑来自 CAHRA 的白银过境的 国家/地区；
- c) 据称来自白银出口量有限的国家/地区；

(1) Location-based High Risk: Recycled silver originating from, or transited/transported through CAHRA, allegedly originating from countries/areas known or reasonably suspected to be transiting silver from CAHRA and/or allegedly originating from countries/areas with limited silver exports

(2) 基于供应商的高风险，再生银供应商或其他已知的上游公司：

- a) 具有符合基于位置高风险标准的股东或最终受益人 或其他白银供应权益
- b) 具有身为政治人物的最终受益人
- c) 从事高风险商业活动（如军火、赌博和娱乐业、古董和艺术、教派及其领袖）
- d) 已知在过去一年曾从高风险国家/地区采购白银
- e) 在具有高洗钱风险的国家/地区运营。

(2) Supplier High Risk: Silver supplying counterparty or other known upstream company operating in a country/region with a high money laundering risk, has a shareholder or UBO or other silver supplying interest that meets the location-based high risk criteria, has a UBO that is a PEP, is engaged in high-risk business activities (e.g., arms, gambling and entertainment industries, antiques and art, sects and their leaders), is known to have in the past 12 months have sourced silver from high-risk countries/regions, have significant and unexplained transportation routes with suppliers or counterparties in the supply chain

(3) 基于材料类型的高风险再生银：

- a) 来自具有高风险供应链的中间精炼厂或交易商，或从具有高风险供应链的中间精炼厂采购的交易方（根据经合组织尽职调查指南）。

(3) Material type high risk: recycled silver sourced from intermediate refineries or traders with high risk supply chains or from counterparties sourced from intermediate refineries with high risk supply chains (as per OECD Due Diligence Guidance)

2.3 归类为高风险的供应链将触发强化尽职调查。

2.3 The Company shall conduct Enhanced Due Diligence (EDD) when it identifies a high risk supply chain as part of its due diligence management process.

出现高风险情况时，公司将采取强化的尽职调查，按以下步骤进行处理：

When the Company identifies a high-risk supply chain during the due diligence process, the Company shall conduct enhanced due diligence management as required by the Guide, with due diligence measures including, but not limited to:

2.3.1 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。

2.3.1 Conduct on-site investigations/interviews of high-risk supply chains to verify the findings documented in the supply chain due diligence documents.

2.3.2 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。

2.3.2 For large-scale silver mining: Utilize credible, independent sources of documents, data, and information to verify the situation. From mines to refineries, the beneficial owners and government monitoring list information of every company in the supply chain, including silver producers, intermediaries, silver traders, exporters, and transporters, must be verified.

2.3.3 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。

2.3.3 For silver extracted from artisanal/small-scale mining: Utilize credible, independent sources of documentation, data, and information to verify the situation. The beneficial owners and government monitoring list information of every company in the supply chain, from silver exporters to refineries, including international silver traders and transporters, must be verified.

2.3.4 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。

2.3.4 For silver recycling: Utilize credible, independent sources of documents, data, and information to verify the situation. The beneficial owners and government monitoring list information of every company in the supply chain, from silver suppliers to refineries, including transporters, must be verified.

2.3.5 在任何交易发生前进行，或至少在业务关系开始后 6 个月内进行。

2.3.5 It should be conducted before any transaction takes place, or at least within 6 months after the commencement of the business relationship

2.3.6 由有能力的员工或独立的第三方顾问进行，他们与供应商不存在任何利益冲突。当公司员工进行现场调查时，他们必须承诺如实、准确地报告。

2.3.6 It should be conducted by capable employees or independent third-party consultants who do not have any conflicts of interest with the suppliers. When company employees conduct on-site investigations, they must promise to report truthfully and accurately.

2.3.7 应用调查工具包中现场调查报告模板。

2.3.7 Apply the template of on-site investigation report in the investigation toolkit.

## 2.4 低风险供应链

不符合零容忍供应链、高风险供应链的供应链为低风险供应链。

**Assessment Criteria for Low-Risk Supply Chains:**

**Supply chains that do not comply with zero tolerance supply chains and high-risk supply chains are low-risk supply chains.**

### 3 评价方法

以 LBMA 尽职调查工具包中的 LBMA 供应链评估表内容为基础，结合实际收到供应商、客户的对应的资料情况，进行评估，最终确定风险等级。

#### 3.1 应对措施

##### 3.1 Responses

a) 低风险：继续交易，降低风险。

a) Low Risk: Continue trading to reduce risk.

- b)高风险：停止交易，采取强化的尽职调查，摆脱风险。
- b)High risk: Suspend trading, conduct enhanced due diligence, and eliminate risks.
- c)零容忍：完全禁止交易。
- c)Zero tolerance:complete prohibition of trading

## 七、供应链尽职调查规定

### Regulations on supply chain due diligence

#### 1 尽职调查流程

##### 1 Due diligence process

- 1.1 在交易前，将公司 LBMA 负责任白银供应链管理政策及要求明确告知对方。
- 1.1 It is necessary to clearly inform the other party of the Company's management policies and requirements for LBMA responsible silver supply chain prior to the transaction.
- 1.2 向含银原料供应商、客户发放尽职调查表，具体内容详见尽职调查表，收集相应的资质与资料。
- 1.2 It is necessary to issue due diligence questionnaire to silver-containing raw material suppliers and customers and collect relevant qualification and information, which is detailed in the due diligence questionnaire.
- 1.3 跟踪、收回尽职调查表，并进行风险评估。
- 1.3 It is necessary to follow up and retrieve the due diligence questionnaire, as well as conduct risk assessment.
- 1.4 编制尽职调查报告。
- 1.4 A due diligence report should be prepared.

#### 2 尽职调查内容

##### 2 Due diligence contents

- 2.1 尽职调查供应商包括矿产白银供应商、含银物料供应商、再生白银供应商、贸易商、运输商。
- 2.1 The suppliers for due diligence include mineral silver suppliers, silver-containing material suppliers, recycled silver suppliers, traders and carriers.
- 2.2 尽职调查客户包括贸易商、买家等；
- 2.2 The clients for due diligence include traders, buyers, etc.
- 2.3 在采购、销售交易发生前，要了解供应商、客户对于来自受冲突影响、高风险区域及存在的其它风险情况负责的供应链采购、销售情况。
- 2.3 Prior to the procurement and sales transactions, it is necessary to figure out the purchasing and sales situation of suppliers and customers responsible supply chain from conflict-affected and high-risk regions and other risk situations existing.
- 2.4 尽职调查应包含供应链资质情况、白银原料产地识别，采矿与山口许可证，采矿情况信息证明是否侵犯人权、是否违规操作等，开采能力数据等。
- 2.4 The due diligence should cover supply chain qualification, identification of silver raw material origin, mining and pass license, proof of mining information which proves

whether there are violations of human rights and illegal operations, as well as mining capacity data, etc.

2.5 尽职调查应包含环境、健康、安全、劳动政策和落实情况，社区参与情况等。

2.5 The due diligence should cover environmental policies and practices, health and safety policies and practices, labour policies and practices, community engagement programmes.

### 3 尽职调查措施

#### 3 Due diligence measures

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

3.1 It is necessary to establish supply chain trader files, including name, legal person, address, contact information, operation mode, transaction contract, etc.

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

3.2 The existing supply chain needs to be evaluated annually. If there are suppliers or customers, risk assessment should be carried out in time and transactions should be conducted only for the case where they meet the requirements of the system.

3.3 确定供应链没有任何的洗钱、诈骗或恐怖主义行为。

3.3 It is necessary to confirm that supply chain is not involved with any money laundering, fraud or terrorism.

3.4 定期获取供应链公司的经营状况及交易目的信息。

3.4 It is necessary to regularly obtain information on the operation status and transaction purpose of the supply chain company.

3.5 针对矿产含银供应商，在交易前，需要获得如下信息：

3.5 For silver-containing mineral suppliers, the following information should be obtained prior to transaction:

a) 白银的产地来源信息

a) Information of silver origin

b) 采矿许可证

b) Mining license

c) 提供进/出口白银或者精矿许可证

c) Provision of import/export license for silver or concentrate

d) 采矿情况信息证明

d) Proof of mining information

e) 定期对矿产白银客户进行尽职调查

e) Performing due diligence on mineral silver customers on a regular basis.

3.6 来自手工矿和小型矿的矿产银供应商，需要获得如下信息：

3.6 Suppliers of silver from artisanal and small-scale mining operations need to obtain the following information:

a) 该手工/小型矿是否合法，提供相关资质证书；

a) Is this handcrafted/small-scale mine legal? Please provide relevant qualification certificates.

b) 白银不是来自于合法的手工/小型矿时，公司会采取保障措施；

- b) When the silver does not come from legal artisanal/small-scale mining, the company will take safeguard measures;
- c) 公司会持续不断的对手工/小型矿供应商进行尽职调查。
- c) The company will continuously conduct due diligence on artisanal/small-scale mining suppliers.
- d) 采矿情况信息证明，开采能力数据
- d) Information on mining conditions, proof of mining capacity data

3.7 针对再生白银供应链客商，在交易前，需要获得如下信息：

3.7 For the traders in the recycled silver supply chain, the following information should be obtained prior to transaction:

- a) 再生白银供应商需提供合法的商业关系，包括再生银来源证明、收益人等信息
- a) The recycled silver suppliers are required to offer legal business relationship, including the origin proof of recycled silver, beneficiary information, etc.
- b) 公司会持续不断的对再生白银客户进行尽职调查
- b) The Company will conduct due diligence on recycled silver customers on an ongoing basis

## 八、对已识别的风险制定并实施风险管理策略

### **Develop and implement risk management strategies for identified risks**

#### 1、风险管理策略

公司对供应链中识别出的风险进行管理，由营销部负责制定并实施风险管理策略，确保白银供应链的负责任采购。公司对所识别的风险采取的风险管理策略如下：

#### **Risk Management Strategy**

The Company manages the risks identified in the supply chain, and the Marketing Department are responsible for formulating and implementing risk management strategies to ensure responsible procurement in the silver supply chain. The risk management strategies adopted by the Company for the identified risks are as follows:

#### 1.1 终止关系

当在强化尽职调查中发现供应商有洗钱、恐怖主义融资、严重侵犯人权、直接或间接支持非国家武装组织、谎报矿物产地的证据时，公司将立即终止与供应商的合作，并根据国内和国际法律要求，向相关主管机构和 LBMA 报告。

#### 1.1 Relationships Termination

When evidence of money laundering, terrorist financing, serious human rights violations, direct or indirect support to non-state armed organizations, or misrepresentation of the origin of minerals is found by a supplier in the course of enhanced due diligence, the Company will immediately terminate its cooperation with the supplier and report it to the relevant authorities and the LBMA in accordance with the requirements of domestic and international laws.

#### 1.2、暂停关系

当在强化尽职调查中发现供应商存在洗钱、恐怖主义融资、严重侵犯人权、直接或间接支持非国家武装组织、谎报矿物产地情况的合理怀疑或者存在灾难性 ESG 影

响时，公司应暂停与供应商的合作。当公司从供应商处获得反驳上述情况初步怀疑的额外信息/数据或针对 ESG 影响的及时和适当的回应时，经公司合规委员会审批后恢复与供应商的合作。

### 1.2 Relationship Suspension

The Company shall suspend its cooperation with the supplier when reasonable suspicion of money laundering, terrorist financing, serious human rights violations, direct or indirect support to non-state armed organizations, misrepresentation of mineral origin, or catastrophic ESG impacts are identified in the enhanced due diligence of the Supplier. When the Company obtains additional information/data from the supplier to refute the initial suspicion of the above circumstances or a timely and appropriate response to address the ESG impacts, cooperation with the supplier is resumed upon approval by the Company's Compliance Committee.

### 1.3、维持关系，但须执行改进计划

当在强化尽职调查结果不完全令人满意，或认为虽然存在贿赂，非欺诈性误报矿物产地，未支付应付政府的税收、费用和特许权使用费，严重违反与环境、健康、安全、劳工和社区有关的地方立法，或存在极有可能造成高度不利影响的 ESG 风险的情况，但白银供应商已作出合理和尽责管理的努力，公司可与白银供应商继续合作。但白银供应商应执行经公司合规委员会审批的改进计划。

改进计划的内容包括但不限于：需要管控的风险，风险管理的目标和影响，定量及定性的绩效评估指标，可以衡量的风险缓解措施，明确的风险缓解进展时间表和必要的资源，监测和跟踪改进计划的执行和完成情况；在实施改进计划的过程中，如果发现风险出现重大变化则需向合规委员会汇报，并确认是否需要调整改进计划；对改进计划执行的有效性的评估，至少每 6 个月评估一次，实施改进计划后，当现实情况或者供应链出现变化后对需要缓解的风险进行监测以及补充评估。

### 1.3 Relationship Maintain(Improvement needed)

when the results of an enhanced due diligence investigation are not fully satisfactory, or when it is believed that while there has been bribery, non-fraudulent misrepresentation of the origin of minerals, non-payment of taxes, fees and royalties payable to the government, serious breaches of local legislation relating to the environment, health, safety, labor, and the community, and/or the existence of an ESG risk that is highly probable to result in a high degree of adverse impact, the the silver supply counterparty has made reasonable and due diligence management efforts, the Company may continue to work with the silver supply counterparty. However, the silver supply counterparty shall implement an improvement plan approved by the Company's Compliance Committee. The content of the improvement plan includes but is not limited to risks to be managed and controlled, risk management objectives and impacts, quantitative and/or qualitative performance assessment metrics, measurable risk mitigation measures, a clear timetable for progress in mitigating the risks and the necessary resources, and monitoring and tracking of the implementation and completion of the improvement plan; and in the course of the implementation of the improvement plan, if a During the implementation of the improvement plan, if significant changes in risks are found, the Compliance Committee will be required to report to the Compliance Committee and confirm whether the improvement plan needs to be adjusted; Evaluation of the effectiveness of the implementation of the improvement plan, at least

once every six months; (8) After the implementation of the improvement plan, when the reality or supply chain changes, the risks to be mitigated will be monitored and supplemented with additional assessments.

## 2 白银供应链违规行为、事项上报程序

### Report procedure of violation behaviors and events in the silver supply chain

1.1 公司白银供应链相关工作人员如发现违规行为、事项，应及时向所在单位、公司合规专员进行书面或电话报告，合规专员向分管领导进行报告，同时将发现的违规行为、事项及处理建议及时向公司合规专员报告，公司合规专员向公司合规总监汇报。

1.1 If relevant workers in the silver supply chain of the Company find violation behaviors and events, they should timely report to the Compliance Officers in the involved organizations and the Company in written or telephone form. Then, the Compliance Officers report to the management leader and report violation behaviors, events, and handling suggestions timely to the Compliance Officer of the Company. Finally, the Compliance Officer of the Company reports to the Compliance Director of the Company.

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

1.2 If there is any systematic or widespread abuse of human rights related to the silver abstraction, transportation or trade, or suppliers directly or indirectly support non-governmental armed organizations, or cheat and cover up original countries of silvers or there is any money laundering or terrorism financing and other events, it is required to report the contractual relationship releasing with these suppliers and relevant salesmen should immediately discharge the contractual relationships.

1.3 发现可能存在有关白银提取、运输或贸易的系统性或广泛人权侵权行为，或者供应商向非法的非政府武装组织提供直接或间接支持，或者欺诈掩盖白银的原产地或者存在洗钱或恐怖主义融资等事项时，立即暂停交易，并对供应链客商进行专项调查，结合调查的结果来确定是否继续进行交易。

1.3 If there is any systematic or widespread abuse of human rights related to the silver abstraction, transportation or trade, or suppliers directly or indirectly support non-governmental armed organizations, or cheat and cover up original countries of silvers or there is any money laundering or terrorism financing and other events, it is required to suspend transaction immediately and conduct special investigations of clients and suppliers in the supply chain and determine whether to continue transactions combining the investigation results.

## 九 白银供应链交易监控

### Silver supply chain transaction monitoring

1.1 为确保公司白银供应链交易符合 LBMA 白银负责任指南要求，与公司对于供应链调查评估的风险一致，保证公司白银的来源合规合法，公司应获取收到的每一批含银原料的相关资料。

1.1 To ensure that the silver supply chain of the Company conforms to the requirements in the LBMA responsible silver guidance and is consistent with the evaluated risk in the supply chain investigation of the Company and ensure the conformity and legality of silver sources of the Company, the Company should acquire relevant data of all received silver-containing raw materials.

1.2 重量和品质数据，运输单据(货运单、航运单、铁路大票、形式发票等)，进出口相关单据，能够获取的其他资料信息。

1.2 Weights and quality data, transport documents (including shipping documents, air waybills, railway documents, proforma invoices and others), relevant import and export documents and other available data information.

1.3 交易过程中出现高风险交易情况，业务人员必须要求客户提供相应资料进行相互印证，核实是否真实相符，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。

1.3 If high risk transaction conditions occur in the transaction process, the business personnel must require clients to provide relevant data for mutual confirmation and authenticity verification and investigate the transaction background. In the case of inconsistency, the written investigation results should be provided through investigations.

1.4 每年合规专员组织实施 LBMA 负责任白银年度内部合规性审核，并编制年度合规性报告，并向公司 LBMA 负责任白银供应链管理领导小组领导报告，并将该报告公布在公司的网站上。

1.4 The Compliance Officer should organize the implementation of the annual internal compliance review of the LBMA responsible silvers each year and prepare the annual compliance report. Besides, he/she should report to leaders of the leading group for LBMA responsible silver supply chain management of the Company, and publish the report on the company's website.

## 十 供应链追溯系统

### Supply chain traceability system

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

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

- a) 白银产品向上追溯（白银—原料）
  - 含银物料类型（矿产白银/再生白银）；
  - 入库重量和分析报告；
  - 原料入库日期和成品入库日期；
- a) Upward traceability of silver products (silver- materials)  
Type of silver bearing material (mined silver / recycled silver).

Warehousing weight and Analysis Report.  
The storage date of raw materials and finished products.  
b) 白银产品向下追溯（白银—顾客）  
- 顾客信息；  
- 交易重量和分析报告；  
- 出库日期；  
b) Down tracking of silver products (silver-customer)  
Customer information.  
Transaction weight and Analysis Report.  
Delivery date.

## 十一 与白银供应商的合作

### Cooperation with silver suppliers

公司致力于与白银供应商长期深度的合作，并与其建立负责任的采购关系，在可能的情况下，公司会将自己的尽责管理体系上的经验以及相关信息分享给白银供应商，以提升白银供应商的尽责管理能力。

营销部将公司的白银供应链尽职调查政策及公司对白银供应商根据本办法开展尽责管理的要求和期望传达给白银供应商，并要求白银供应商签订供应链尽责管理政策承诺书。对已建立矿产尽责管理政策的白银供应商，公司将收集并评估供应商的矿产尽责管理政策。

The company is committed to long-term and deep cooperation with silver suppliers, and establishes responsible procurement relationships with them. Whenever possible, the company will share its experience and relevant information from its responsible management system with silver suppliers, in order to enhance their responsible management capabilities.

The Marketing Department will communicate the company's due diligence policy for the silver supply chain, as well as the company's requirements and expectations for conducting responsible management of silver suppliers in accordance with these measures, to the silver suppliers. The department will also request the silver suppliers to sign a commitment letter for the supply chain responsible management policy. For silver suppliers who have already established mineral responsible management policies, the company will collect and evaluate their mineral responsible management policies.

## 十二 白银供应链尽职调查培训

### Silver supply chain due diligence training

1 公司每年会对白银供应链中的员工进行该规定的培训，并将培训计划纳入年度培训计划当中，至少每年进行一次。

1 The Company will provide specified training for employees in the silver supply chain and include the training plan in the annual training plan at least once a year.

2 涉及白银供应链的员工必须参加，并通过培训签到的形式进行相关培训确认。

2 Employees with regard to the silver supply chain must participate in the training and the training signing form should be adopted to confirm whether employees undergo relevant training.

3 采用线上或线下讲解授课方式，内容包括但不限于：LBMA 负责的白银指南、供应链尽职调查管理办法、供应链尽职调查政策、供应链尽职调查能力建设等

3 Adopt online or offline teaching methods, with content including but not limited to: LBMA's Guide to Responsible Silver, supply chain due diligence management methods, supply chain due diligence policies, supply chain due diligence capacity building, etc

4 培训后，总结培训效果，建立相应培训记录。

4 After the training, summarize the training effectiveness and establish corresponding training records.

### 十三 记录的保留

#### **Record keeping**

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

1 According to the LBMA requirements, enough supply chain file records should be kept to verify the conformity of appropriate and continuous due diligence.

2 保留供应链追溯系统的记录。

2 Records in the supply chain tracing system should be kept.

3 记录保存 5 年。

3 The record retention period should be 5 years.

### 十四 白银供应链第三方审核监督

#### **The third-party review and supervision of the silver supply chain**

1 由指定认可的第三方审计机构开展年度第三方审核，确保持续改进。

1 The specified and recognized third-party audit agency implements the annual third-party review and ensures continuous improvement.

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

2 For the risks and problems proposed by the third-party review agency during the review process, departments, controlled corporations and subsidiaries involved in the silver supply chain management should seriously formulate the improvement measure, time limit, responsible persons and others for problems.

### 十五 问责

#### **Accountability**

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

If employees from relevant departments and branch factories of the company involved in the silver supply chain fail to carry out their work in accordance with the requirements of this regulation, resulting in adverse consequences, they will be dealt with according to the severity of the situation and in accordance with the company's relevant accountability management regulations.

## 十六 供应链违规上报通讯机制

### **Silver Supply Chain Breach Reporting Communication Mechanism**

公司建立申诉机制，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。设立意见箱，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。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。

The company has established a grievance mechanism, and necessary communication has been conducted with suppliers during the procurement process of silver-containing materials. Internal and external stakeholders can anonymously report any violations in the silver trading process. A suggestion box has been set up as a reporting and grievance channel for internal employees, and relevant personnel regularly open the box to check and summarize the reported content. The company's due diligence policies, telephone numbers, and email addresses are all published on the company website, so all employees and suppliers can access this information online. Anyone who has questions about the policies or discovers any violations can provide feedback through telephone, email, or other means. The privacy of the complainant is protected throughout the grievance process, and the information of the reporter is kept confidential to prevent any retaliation.

#### 相关文件

#### **Relevant documents**

《关于 LBMA 负责任白银的公告》

*Announcement on LBMA Responsible Silver*

《关于 LBMA 负责任白银原料采购声明》

*Statement on LBMA Responsible Procurement of Silver Raw Material*

《LBMA 负责的白银供应链评估表》

*Assessment Form on LBMA Responsible Silver Supply Chain*

《LBMA 尽职调查问卷-矿产原料》

KYC Questionnaire LBMA Mined Material

《LBMA 了解你的客户问卷-再生原料》

KYC Questionnaire LBMA Recycled Material