



**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

2025 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 2025

(2025/01/01-2025/12/31)

<b>Company Name:</b>	江西铜业铅锌金属有限公司 <b>Jiangxi Copper Lead &amp; Zinc Metal Co., Ltd</b>
<b>Location:</b>	High Tech Industrial Park, Hukou County, Jiujiang City, Jiangxi Province, P.R.China.
<b>Reporting year-end:</b>	31 December 2025
<b>Date of Report</b>	3 April 2026
<b>Senior management responsible for this report</b>	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 2025 财年内（2025 年 1 月 1 日-2025 年 12 月 31 日）对《伦敦金银市场协会负责的白银指南》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 2025 (January 1, 2025-December 31, 2025).

## 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。

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.

江西铜业铅锌金属有限公司是江西铜业集团有限公司旗下的控股子公司，作为集团铅锌板块的核心企业，与集团内部多家单位形成了紧密的原料供应与销售协同。在原料端，江西江铜银珠山矿业有限公司、江西铜业集团（铅山）选矿有限公司、江西金德铅业股份有限公司及江西铜业集团银山矿业有限责任公司等持续为公司提供稳定的银铅锌矿产品；在销售端，公司依托江西铜业（深圳）国际投资有限公司、江西铜业国际贸易有限公司及江铜国际（香港）有限公司等平台开展金银产品的境内外贸易及出口业务，实现了内部资源的有效整合与产业链联动。

Jiangxi Copper Lead & Zinc Metal Co., Ltd. is a holding subsidiary of Jiangxi Copper Corporation Limited and serves as the core enterprise of the Group's lead-zinc sector. It has established close collaboration with multiple internal entities in raw material supply and sales. On the supply side, Jiangxi Jiangce Silver Lead Zinc Mining Co., Ltd., Jiangxi Copper Group (Yanshan) Beneficiation Co., Ltd. , Jiangxi Jinde Lead Industry Co., Ltd., and Jiangxi Copper Group Yinshan Mining Co., Ltd. have continued to provide stable supplies of silver-, lead-, and zinc-bearing materials to the Company. On the sales side, the Company leverages platforms such as Jiangxi Copper (Shenzhen) International Investment Co., Ltd. , Jiangxi Copper International Trading Co., Ltd. , and Jiangxi Copper International (Hong Kong) Co., Ltd. to carry out domestic and international trade and export of gold and silver products, thereby achieving effective integration of internal resources and industry chain linkage.

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。

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.

报告期内，在相关政府部门的指导与支持下，公司积极践行绿色发展理念，深度参与并推动多项环境治理与可持续发展重点项目。在九江市生态环境局的统筹指导下，公司实施开展了尾气升级改造工程，通过工艺优化与技术升级，有效提升污染物排放控制水平，体现了公司在环境保护领域的切实投入与社会责任担当。此外，公司积极响应江西省生态环境厅“美丽细胞”建设工程的号召，全面推动厂区环境整治与生态建设，凭借扎实的治理成效与良好的社会形象，成功获评“美丽工厂”称号。上述实践充分彰显了公司在 ESG 领域的持续努力，也为行业绿色转型提供了有益探索。

During the reporting period, under the guidance and support of relevant government authorities, the Company actively embraced the concept of green development and deeply engaged in and promoted several key environmental and sustainable development initiatives. Under the coordination of the Jiujiang Municipal Bureau of Ecology and Environment, the Company implemented an exhaust gas upgrading and renovation project. Through process optimization and technological upgrades, the project effectively enhanced pollutant emission control levels, reflecting the Company's tangible commitment and social responsibility in environmental protection. Furthermore, the Company actively responded to the call of the Jiangxi Provincial Department of Ecology and Environment's "Beautiful Cell" construction initiative, comprehensively advancing plant environmental improvement and ecological development. With solid governance outcomes and a positive corporate image, the Company was successfully recognized as a "Beautiful Factory." These practices fully demonstrate the Company's ongoing efforts in the ESG field and provide valuable insights for the green transformation of the industry.

## 二、合规性概述

### II. Compliance Overview

公司对所有含银原料供应商开展全面的尽职审查，确保原材料来源合法、合规，符合 LBMA 《负责任白银指南》（第二版）的要求。2025 年，公司持续完善白银供应链尽职调查体系，未发现系统性或广泛性的人权侵犯行为，所有供应链风险均在可控范围内。以下按照 LBMA 指南五步法，详细阐述公司 2025 年度在白银供应链尽职调查方面的具体实践与合规情况。

The Company conducts comprehensive due diligence on all silver-bearing material suppliers to ensure that the sources of raw materials are legal and compliant with the requirements of the LBMA Responsible Silver Guidance (Second Edition). In 2025, the Company continued to improve its silver supply chain due diligence system, and no systematic or widespread human rights violations were identified; all supply chain risks remained within controllable limits. The following sections detail the Company's specific practices and compliance status regarding silver supply chain due diligence in 2025, following the five-step approach of the LBMA Guidance.

#### 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:**

公司完全遵循第一步要求，构建并运行了完善的白银供应链尽职调查管理体系。

The Company has fully complied with Step 1 by establishing and operating a comprehensive silver supply chain due diligence management system.

#### 1、公司政策

#### 1、Company Policy

公司于 2025 年更新了第三版《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》，明确了采购政策中应避免的所有威胁性融资风险，包括 OECD 指南附件二所列内容，并新增了对环境、社会和治理（ESG）因素的考量。政策已获合规总监批准，并在公司官网公开发布：[www.jxccqx.com/](http://www.jxccqx.com/)。

In 2025, the Company updated the third edition of the Jiangxi Copper Lead & Zinc Metal Co., Ltd. LBMA Responsible Silver Supply Chain Due Diligence Management System, clarifying all threatening financing risks to be avoided in procurement policies, including those listed in Annex II of the OECD Guidance, and incorporating environmental, social and governance (ESG) factors for consideration. The policy has been approved by the Compliance Director and is publicly available on the Company's official website: [www.jxccqx.com/](http://www.jxccqx.com/).

公司严格禁止供应商存在以下行为：

The Company strictly prohibits suppliers from engaging in the following behaviors:

- (1) 使用童工、强迫劳动、酷刑等侵犯人权的行为；
- (1) Human rights violations, including child labor, forced labor, torture, etc.;
- (2) 向非法武装组织提供直接或间接支持；
- (2) Providing direct or indirect support to illegal armed groups;
- (3) 隐瞒白银原产地或伪造来源信息；
- (3) Concealing the origin of silver or falsifying source information;
- (4) 违反政府税费缴纳要求；
- (4) Violating government tax and royalty payment requirements;
- (5) 涉及洗钱、恐怖主义融资或资助冲突；
- (5) Involvement in money laundering, terrorist financing, or conflict financing;
- (6) 从事武器、赌博、古董、艺术品等高风险行业；
- (6) Engaging in high-risk businesses such as weapons, gambling, antiques, and artworks;
- (7) 受益人为政治敏感人物或被通缉人员；
- (7) Beneficiaries being politically exposed persons or wanted persons;
- (8) 违反环境、健康、安全、劳动相关法律法规；
- (8) Violating environmental, health, safety, and labor laws and regulations;
- (9) 开采来源地为世界遗产保护区。
- (9) Mining sources from World Heritage Sites.

## 2、管理架构

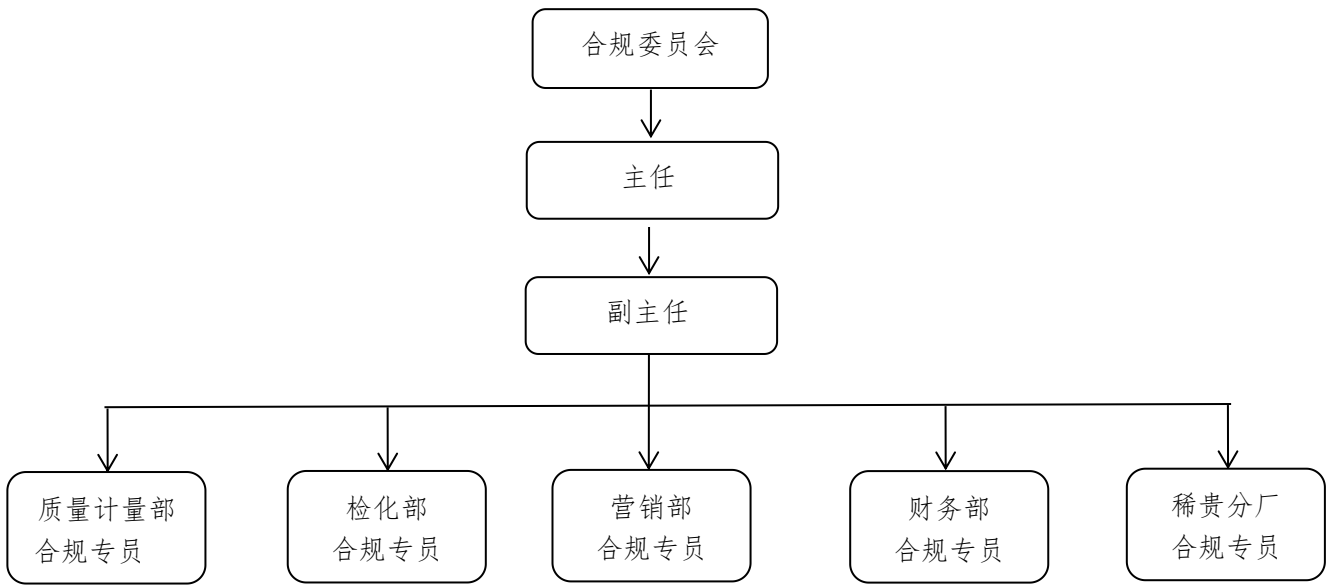
### 2、Internal management structure

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：

The company has established a dedicated management team for due diligence on the silver supply chain, with the following organizational structure:

白银管理组织架构

Silver management organizational structure



公司设有合规委员会，主任由总经理担任，副主任由生产与经营副总担任，成员包括各相关部门及分厂负责人。合规委员会负责审批尽职调查政策、合规报告，并提供资源配置支持。

The Company has established a Compliance Committee, chaired by the General Manager, with the Deputy General Managers of Production and Operations as deputy directors, and members including heads of relevant departments and workshops. The Compliance Committee is responsible for approving due diligence policies and compliance reports, and providing resource support.

合规总监由副总经理刘湖滨担任，负责审批供应商合作合同、提供资源支持，并定期组织管理层培训，确保公司尽职调查管理体系持续有效运行。

The Compliance Director is Mr. Liu Hubin, Deputy General Manager, responsible for approving supplier cooperation contracts, providing resource support, and organizing regular management training to ensure the continued effectiveness of the Company's due diligence management system.

合规经理由营销部主任周圣兵担任。周圣兵长期从事原料采购及供应链管理工作，熟悉冶炼生产工艺及原料采购流程，具备丰富的合规管理经验，对供应链各环节可能存在的风险具有清晰的认识和敏锐的判断力。其全面负责尽职调查事务，确保高风险交易采取适当措施，并提交风险评估报告，定期向合规委员会及总经理直接汇报合规工作情况，确保合规动态及时传达、重大问题第一时间响应，推动各项尽职调查工作有序开展。

The Compliance Manager is Mr. Zhou Shengbing, Director of the Marketing Department. With long-term experience in raw material procurement and supply chain management, Mr. Zhou is familiar with smelting production processes and procurement procedures. He possesses extensive compliance management experience and has a clear understanding and keen insight into potential risks at various stages of the supply chain. He is fully responsible for due diligence affairs, ensuring that appropriate measures are taken for high-risk transactions, submitting risk assessment reports, and regularly reporting compliance work directly

to the Compliance Committee and the General Manager. This ensures that compliance updates are communicated promptly and significant issues are addressed without delay, promoting the orderly implementation of all due diligence activities.

各职能部门职责明确：

Each functional department has clear responsibilities:

- (1) 营销部：负责供应商信息确认与高风险地区拒绝合作；
- (1) Marketing Department: Responsible for supplier information verification and refusal to cooperate with high-risk regions;
- (2) 质量计量部：负责原料称重、出入库记录与银锭质量监督；
- (2) Quality Measurement Department: Responsible for raw material weighing, warehouse in/out records, and silver ingot quality supervision;
- (3) 检化部：负责银纯度检测；
- (3) Inspection and Chemical Department: Responsible for silver purity testing;
- (4) 稀贵分厂：负责银锭生产、称重、打标与可追溯管理；
- (4) Rare & Precious Metals Plant: Responsible for silver ingot production, weighing, marking, and traceability management;
- (5) 财务部：负责交易凭证保存与反洗钱监督。
- (5) Finance Department: Responsible for preserving transaction documents and anti-money laundering supervision.

### 3、培训

### 3、 Training

2025年，公司分别于2月15日及8月5日组织开展了两次集中培训，培训主题分别为“供应商尽职调查能力建设”与“LBMA负责任白银指南第二版核心要点解读”。各相关部门均派员参加，董事会成员亦参与其中。2月15日培训共有14人参加，8月5日培训共有15人参加。培训由内部合规人员主讲，结合外部典型案例进行阐释，使参训人员对供应链尽职调查的关键流程及新版指南的重点要求形成更深入的理解。相关培训记录已完整归档保存，作为持续改进的依据。

In 2025, the Company organized two centralized training sessions on February 15 and August 5, focusing on "Supplier Due Diligence Capacity Building" and "Interpretation of the Core Elements of the Second Edition of the LBMA Responsible Silver Guidance," respectively. Representatives from all relevant departments participated, including members of the Board of Directors. A total of 14 attendees participated in the February 15 training session, and 15 attendees participated in the August 5 training session. The training was delivered by internal compliance personnel, who illustrated key concepts through external case studies, enabling participants to gain a deeper understanding of the critical procedures in supply chain due diligence

and the key requirements of the updated guidance. Relevant training records have been properly archived as a basis for continuous improvement.

#### 4、与供应商约定

#### 4、Engagement with silver suppliers

公司在合同签订前向供应商传达负责任采购政策，发放尽职调查问卷与承诺书，要求其书面承诺原料来源合规。2025 年，共完成 40 家供应商的政策传达、问卷回收与风险评估工作。对于新供应商，营销部在初步接洽时即提供政策文件，并安排专人解答疑问；对于既有供应商，每年进行年度复核，确保其持续符合要求。

Before signing contracts, the Company communicates its responsible sourcing policy to suppliers, issues due diligence questionnaires and letters of commitment, and requires them to provide written commitments on raw material source compliance. In 2025, policy communication, questionnaire collection, and risk assessment were completed for 40 suppliers. For new suppliers, the Marketing Department provides policy documents during initial contact and assigns dedicated personnel to answer questions; for existing suppliers, an annual review is conducted to ensure continued compliance.

2025 年，公司通过电话、微信、实地走访等多种方式与供应商保持常态化沟通，并邀请其参与尽职调查流程，协助提升合规管理能力。在实地走访方面，公司依据《LBMA 负责任白银供应链尽职调查管理体系》相关要求，制定走访计划，明确核查重点。走访过程中，工作组深入了解供应商的运营状况、上游来源及内部管理体系，现场沟通合规要求，并就尽职调查相关事项进行交流与记录。同时，工作组对供应商可能存在的风险情况进行初步研判，若发现涉及高风险警示信号，将立即按公司高风险管理流程启动强化尽职调查程序，确保风险得到及时识别与有效处置。走访结束后，工作组及时总结走访情况，梳理发现的问题与建议，相关情况纳入供应商日常管理参考。2025 年，公司共对 14 家关键供应商开展了实地走访，有效促进了对供应链上游风险的动态掌握与跟踪。公司继续支持《采掘业透明度行动计划》（EITI）原则，鼓励供应商公开其向政府支付的税费信息，进一步提升供应链透明度。

In 2025, the Company maintained regular communication with suppliers through various channels such as phone calls, WeChat, and on-site visits, and invited them to participate in the due diligence process to assist in enhancing their compliance management capabilities. Regarding on-site visits, the Company developed visit plans and defined key verification points in accordance with the requirements of the LBMA Responsible Silver Supply Chain Due Diligence Management System. During the visits, the working group gained in-depth understanding of the suppliers' operational status, upstream sources, and internal management systems, communicated compliance requirements on-site, and exchanged and recorded information related to due diligence matters. Meanwhile, the working group conducted preliminary assessments of potential risks associated with the suppliers. If high-risk warning signals were identified, the

enhanced due diligence procedure would be immediately initiated in accordance with the Company's high-risk management process, ensuring timely identification and effective mitigation of risks. Upon completion of the visits, the working group promptly summarized the findings, organized identified issues and recommendations, and incorporated relevant information into daily supplier management references. In 2025, the Company conducted on-site visits to 14 key suppliers, effectively promoting dynamic understanding and tracking of upstream supply chain risks. The Company continues to support the principles of the Extractive Industries Transparency Initiative (EITI) and encourages suppliers to disclose tax and royalty payments made to governments, further enhancing supply chain transparency.

## 5、供应链可追溯系统

### 5、Supply chain traceability system

公司建立了完善的追溯体系，每批采购的含银原料均完整保存供应商信息、对应矿山来源、采购合同、检验报告、入库记录等资料，确保每一批原料的来源矿山均可追溯。生产过程中，每块银锭均赋予唯一编号，该编号与原料批次、供应商及矿山信息相关联，可实现从成品银锭至源头矿山的全程逆向追溯。相关记录完整归档，保障供应链全过程可查、可控。

The Company has established a comprehensive traceability system. For each batch of purchased silver-bearing materials, complete records are maintained, including supplier information, corresponding mine of origin, procurement contracts, inspection reports, and warehousing records, ensuring that the source mine of each batch of raw materials can be traced. During the production process, each silver ingot is assigned a unique number, which is linked to the raw material batch, supplier, and mine information, enabling full reverse traceability from the finished silver ingot back to the source mine. All relevant records are properly archived, ensuring that the entire supply chain process is verifiable and controllable.

为强化供应链风险管理，确保自提原料运输过程规范可控、可追溯，公司于2025年8月28日制定并发布《自提原料转运监督管理办法》。该办法进一步明确了营销部、原料部、质量计量部及综合办公室在自提原料运输过程中的职责分工与监督流程，细化转运各环节的操作规范与控制要求，确保原料从提货点至厂区的全过程处于有效监控之下，供应链风险可控、责任可溯。

To strengthen supply chain risk management and ensure that the transportation process of self-collected raw materials is standardized, controllable, and traceable, the Company formulated and issued the Management Measures for Supervision of Self-Collected Raw Material Transfer on August 28, 2025. These measures further clarify the responsibilities and supervision processes of the Marketing Department, Raw Material Department, Quality Measurement Department, and General Office during the transportation of self-collected raw materials, and specify operational standards and control requirements for each stage of transfer. This ensures that the entire process from the pickup point to the plant site is under effective monitoring, with controllable supply chain risks and traceable responsibilities.

## 6、交易付款和交易监控

### 6、Transaction Payment & Monitoring

所有交易均通过银行转账完成，无现金结算。国外进口精矿绝大部分采用信用证付款，国内采用银行转账。合规专员对每笔交易进行监控，重点核查交易金额、交易对手、付款路径是否与合同一致，是否存在异常大额或频繁交易。2025 年共监控交易 761 笔，未发现异常。监控结果按月形成报告，提交合规经理审核，确保交易背景真实、资金来源合法。

All transactions are settled via bank transfer, with no cash transactions. The vast majority of concentrate imports are paid via letter of credit, while domestic transactions are conducted through bank transfers. The Compliance Officer monitors each transaction, focusing on verifying whether the transaction amount, counterparty, and payment route are consistent with the contract, and whether there are any unusually large or frequent transactions. In 2025, 761 transactions were monitored, with no anomalies found. Monitoring results are reported monthly to the Compliance Manager for review, ensuring that the transaction background is genuine and the source of funds is legal.

## 7、记录保留

### 7、Records keeping

公司按照管理体系要求，所有供应商相关文件（营业执照、采矿证、尽职调查文件、合同、检验记录、银行凭证等）至少保存五年。文件分类归档，纸质文件存放于档案室，电子文件备份至专用服务器，并设置访问权限，确保信息安全。2025 年，公司对档案管理系统进行了合规性检查，所有记录完整、可查。

In accordance with the management system requirements, the Company retains all supplier-related documents (business licenses, mining permits, due diligence documents, contracts, inspection records, bank vouchers, etc.) for at least five years. Documents are classified and archived, with paper documents stored in the archives room and electronic files backed up on a dedicated server with access permissions to ensure information security. In 2025, the Company conducted a compliance check on the file management system, confirming that all records are complete and retrievable.

## 8、申诉机制

### 8、Confidential grievance mechanisms

公司建立并运行申诉机制，员工与外部利益相关方可匿名举报违规行为。内部设意见箱，由工会每月定期开启收集；外部可通过电话（0792-6376404）或邮箱（lijian1211@126.com）反馈。所有申诉均登记在册，由合规经理指派专人调查，并在 30 个工作日内反馈处理结果。调查过程严格保密，保护举报人免受打击报复。

The Company has established and operates a grievance mechanism, allowing employees and external stakeholders to report violations anonymously. Internally, a suggestion box is available, collected monthly

by the trade union; externally, feedback can be provided via telephone (0792-6376404) or email (lijian1211@126.com). All grievances are registered, and the Compliance Manager assigns dedicated personnel to investigate, with results communicated within 30 working days. The investigation process is strictly confidential, protecting whistleblowers from retaliation.

2025 年度公司工会共收集员工实名申诉 8 条，其中关于工作条件方面有 7 条，关于员工福利方面 1 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，年内已完成所有申诉处理落实，申诉处理详情已在公司内部工作网站进行公告。

In 2025, the company's labor union collected a total of 8 real-name complaints from employees, including 7 regarding working conditions and 1 regarding employee benefits. The complaints were categorized and handled by the departments involved, with the labor union responsible for tracking and supervising the implementation. All complaints were handled and implemented within the year, and the details of the complaint handling have been announced on the company's internal work website.

## 9、问责机制

### 9、Accountability Mechanism

为确保白银供应链尽职调查管理体系有效运行，公司建立了明确的问责机制。各相关部门、分子公司涉及白银供应链管理的员工，须严格按照公司《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》及相关管理规定开展工作。对未按规定履职、漏报瞒报风险信息造成不良后果的，公司将依据公司相关管理规定，视情节轻重对责任人予以谈话提醒、通报批评、绩效扣分、调岗降职等处理；情节严重、造成重大损失的，依法依规追究相应责任。问责机制的建立与实施，进一步强化了全员合规意识，保障了白银供应链尽职调查工作的规范开展。

To ensure the effective operation of the silver supply chain due diligence management system, the Company has established a clear accountability mechanism. Employees of relevant departments, subsidiaries, and branches involved in silver supply chain management must strictly carry out their work in accordance with the Company's LBMA Responsible Silver Supply Chain Due Diligence Management System and relevant management provisions. For those who fail to perform duties as required or omit or conceal risk information, resulting in adverse consequences, the Company will, based on the severity of the circumstances and in accordance with the Company's relevant management provisions, impose measures including verbal warnings, criticism by circular, performance deduction, position transfer, or demotion. In cases of serious circumstances causing significant losses, corresponding responsibilities will be pursued in accordance with laws and regulations. The establishment and implementation of this accountability mechanism has further strengthened the compliance awareness of all employees, ensuring the standardized conduct of silver supply chain due diligence work.

## 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.

#### 1、供应链风险识别

##### 1、Identify risks in the supply chain

公司依据 OECD 指南附件二及 ESG 因素，建立了风险识别方法，涵盖从原产地到精炼厂的全链条。通过 KYC 问卷、供应商档案、受益人核查等手段，识别潜在风险。风险识别过程中，公司参考以下信息来源：

Based on Annex II of the OECD Guidance and ESG factors, the Company has established risk identification methods covering the entire chain from origin to refinery. Potential risks are identified through KYC questionnaires, supplier profiles, and beneficial owner verification. In the risk identification process, the Company refers to the following information sources:

(1) 国际制裁名单（如联合国、欧盟、美国 OFAC）；

(1) International sanctions lists (e.g., UN, EU, US OFAC);

(2) 受冲突影响和高风险地区（CAHRA）名单；

(2) Conflict-Affected and High-Risk Areas (CAHRA) lists;

(3) 金融行动特别工作组（FATF）发布的洗钱高风险国家/地区报告；

(3) FATF reports on high-risk money laundering countries/regions;

(4) 海德堡冲突晴雨表、脆弱国家指数等专业机构报告；

(4) Reports from professional institutions such as the Heidelberg Conflict Barometer and Fragile States Index;

(5) 环境与社会风险相关数据库（如世界遗产地、森林砍伐监测）。

(5) Environmental and social risk databases (e.g., World Heritage Sites, deforestation monitoring).

2025 年，公司对所有 40 家供应商完成了 KYC 信息收集与核查，未发现任何与制裁名单或高风险地区相关的记录。

In 2025, the Company completed KYC information collection and verification for all 40 suppliers, with no records related to sanctions lists or high-risk areas found.

#### 2、供应链风险分类

##### 2、Risk classification in the supply chain

公司从地理位置、供应链结构、原料类型三方面进行风险分类，参考国际制裁名单、CAHRA 名单、FATF 报告等信息来源，制定高风险判定标准。

The Company classifies risks based on three aspects: geographic location, supply chain structure, and raw material type. Reference is made to international sanctions lists, CAHRA lists, FATF reports, and other information sources to establish high-risk criteria.

2.1 高风险供应链：满足以下任一条件即判定为高风险：

2.1 High-risk supply chains: Any of the following conditions qualifies as high-risk:

- (1) 原材料来自或途经受冲突影响或人权风险高的地区；  
(1) Raw materials originate from or transit through conflict-affected or high human rights risk areas;
- (2) 原材料声称来自已知储量有限或产量异常的国家；  
(2) Raw materials are claimed to come from countries with limited known reserves or abnormal production;
- (3) 供应链企业位于洗钱、腐败高风险国家；  
(3) Supply chain companies are located in high-risk countries for money laundering or corruption;
- (4) 受益人涉及政治敏感人物；  
(4) Beneficiaries involve politically exposed persons;
- (5) 企业从事武器、赌博等高风险业务；  
(5) Companies engage in high-risk businesses such as weapons or gambling;
- (6) 违反环境、健康、安全、劳动相关法律法规。  
(6) Violations of environmental, health, safety, and labor laws and regulations.

2.2 零容忍供应链：满足以下任一条件即判定为零容忍：

2.2 Zero-tolerance supply chains: Any of the following conditions qualifies as zero-tolerance:

- (1) 来自世界遗产地或保护区；  
(1) Sourced from World Heritage Sites or protected areas;
- (2) 来自违反国际制裁的国家；  
(2) Sourced from countries violating international sanctions;
- (3) 供应商或受益人涉及洗钱、诈骗、恐怖主义；  
(3) Suppliers or beneficiaries involved in money laundering, fraud, or terrorism;
- (4) 存在严重侵犯人权行为；  
(4) Serious human rights abuses;
- (5) 直接或间接支持非国家武装组织；  
(5) Direct or indirect support for non-state armed groups;
- (6) 故意谎报矿物来源。

(6) Intentional misrepresentation of mineral origin.

2025 年，未发现符合零容忍或高风险判定标准的供应链。

In 2025, no supply chain met the zero-tolerance or high-risk criteria.

### 3、强化尽职调查

#### 3、Enhanced due diligence

公司规定，一旦发现高风险警示信号，立即启动强化尽职调查程序，必要时开展实地考察。

The Company stipulates that once a high-risk warning signal is detected, enhanced due diligence procedures are immediately initiated, and on-site visits are conducted if necessary.

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。最后，合规总监向合规委员会和总经理报告高风险供应链及强化尽职调查的处理结果。

(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. Finally, the Compliance Director reports the handling results of high-risk supply chains and enhanced due diligence to the Compliance Committee and the General Manager.

2025 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。公司供应链调查与风险识别团队成员均来自各相关业务及职能部门，具备一年以上实际操作经验，熟悉从原料采购、质量检测到生产加工等各环节业务流程，能够准确识别供应链中潜在的各类风险点。上述人员配置与实际工作经验，为公司有效开展供应链风险识别与评估工作提供了坚实的资源保障与能力支撑。

During 2025, the Company did not encounter any high-risk supply chains, and therefore, no enhanced due diligence was triggered. The members of the Company's supply chain investigation and risk identification

team are drawn from relevant business and functional departments. Each member possesses over one year of practical operational experience and is familiar with the business processes across raw material procurement, quality inspection, and production stages, enabling them to accurately identify various potential risk points within the supply chain. The aforementioned team composition and practical work experience provide solid resource guarantee and capability support for the Company to effectively carry out supply chain risk identification and assessment.

### 第三步：设计并实施风险应对策略

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

合规声明：

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

公司完全遵循第三步要求，制定了分级风险管理策略。

#### 1、风险管理策略

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

根据风险评估结果，公司采取以下三类应对方式：

Based on risk assessment results, the Company adopts three types of responses:

(1) 终止关系：适用于零容忍风险或无法通过改进计划消除的高风险。公司将立即停止交易，封存相关产品，并向管理层、监管部门及 LBMA 报告。

(1) Termination of relationship: Applicable to zero-tolerance risks or high risks that cannot be eliminated through improvement plans. The Company immediately ceases transactions, seals relevant products, and reports to management, regulatory authorities, and the LBMA.

(2) 暂停关系：适用于存在合理怀疑但需进一步核实的情况。公司暂停采购，要求供应商提供补充证据或采取纠正措施，待风险消除后经合规总监批准恢复合作。

(2) Suspension of relationship: Applicable where reasonable suspicion exists but requires further verification. The Company suspends procurement, requiring the supplier to provide supplementary evidence or take corrective actions. Cooperation is resumed after risk elimination, subject to Compliance Director approval.

(3) 维持关系：适用于低风险或存在轻微问题但供应商承诺改进的情况。公司与供应商签订改进计划，明确绩效目标、时间表和评估指标，并持续监控进展。

(3) Maintenance of relationship: Applicable to low risks or minor issues with supplier commitment to improvement. The Company signs an improvement plan with the supplier, specifying performance objectives, timelines, and evaluation indicators, and continuously monitors progress.

2025 年，所有供应商均为低风险，未启用风险缓解策略。

In 2025, all suppliers were assessed as low-risk, and no risk mitigation strategies were activated.

## 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.

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.

#### 2.1 量化手段和绩效评估：

##### 2.1 Measurable steps and performance evaluation:

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，我们将继续从何处获取白银原材料。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，我们将立即停止从何处获取白银原材料，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 2025 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。

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 2025, 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.

## 2.2 定期重新评估与持续监控:

### 2.2 Periodic reassessment and continuous monitoring:

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。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。

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. 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.

## 2.3 定期报告:

### 2.3 Regular reporting:

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 管理体系运行情况总结, 发扬优良的风险评估方式方法, 提出不足及改进措施。

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.

2025 年, 所有供应商均通过年度评估, 未出现终止或暂停合作情况。

In 2025, all suppliers passed the annual assessment, and no cooperation was terminated or suspended.

## 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:**

公司完全遵循第四步要求, 聘请独立第三方机构开展审计。

The Company has fully complied with Step 4 by engaging an independent third party to conduct audits.

2025 年，公司严格遵循采购管理规范，通过公开、公平、公正的竞标比价程序，对多家候选审计机构的资质、技术能力及商务报价进行综合评估。2026 年 1 月 19 日，公司组织召开 2026 年营销价格委员会第二次会议，对竞标结果进行审议确认，最终确定委托 TUV Rheinland (Shanghai) Co., Ltd.（莱茵技术（上海）有限公司）对公司 2025 年度白银供应链尽职调查管理体系进行合理鉴证。

In 2025, the Company strictly followed its procurement management guidelines and conducted an open, fair, and transparent bidding and price comparison process, comprehensively evaluating the qualifications, technical capabilities, and commercial proposals of multiple candidate audit firms. On January 19, 2026, the Company convened the Second Meeting of the 2026 Marketing Price Committee to review and confirm the bidding results, ultimately deciding to entrust TUV Rheinland (Shanghai) Co., Ltd. to perform reasonable assurance on the Company's 2025 silver supply chain due diligence management system.

审计范围覆盖公司白银供应链尽职调查管理体系的全部要素，包括政策、管理架构、培训、供应商约定、可追溯系统、交易监控、记录保留、申诉机制、风险评估、风险管理、报告披露等。审计方法包括文件审查、人员访谈、现场观察、数据抽样等。

The audit scope covered all elements of the Company's silver supply chain due diligence management system, including policy, management structure, training, supplier engagement, traceability system, transaction monitoring, records keeping, grievance mechanism, risk assessment, risk management, and reporting. Audit methods included document review, personnel interviews, on-site observation, and data sampling.

审计过程中未发现中高风险不符合项，提出项改进建议（均为低风险），如进一步细化供应商档案、优化培训记录保存等。公司已制定整改计划，预计于 2026 年 5 月前完成。上一年度发现问题已全部整改闭环。审计报告已发布于公司官网：[www.jxccqx.com/](http://www.jxccqx.com/)。

During the audit, no medium or high-risk non-conformities were identified, but \*\*\*\*\* improvement suggestions (all low-risk) were proposed, such as further refining supplier profiles and optimizing training record retention. The Company has developed a rectification plan, expected to be completed by May 2026. All issues found in the previous year have been rectified and closed. The audit report has been published on the Company's official website:[www.jxccqx.com/](http://www.jxccqx.com/).

## 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:

公司完全遵循第五步要求，编制并公开年度合规报告。

The Company has fully complied with Step 5 by preparing and publicly disclosing the annual compliance report.

公司依据 LBMA 指南要求，编制了《江西铜业铅锌金属有限公司白银尽职调查合规报告（2025 年）》，详细说明尽职调查政策、流程、风险评估与控制措施，并已通过公司官网公开发布：[www.jxccqx.com/](http://www.jxccqx.com/)。

In accordance with the LBMA Guidance, the Company has prepared the 2025 Due Diligence Compliance Report for the Silver Supply Chain, detailing the due diligence policies, procedures, risk assessments, and control measures, and has made it publicly available on the Company's website: [www.jxccqx.com/](http://www.jxccqx.com/).

报告发布后，公司通过邮件向主要供应商、行业伙伴及利益相关方发送通知，欢迎各界反馈。截至目前，未收到负面评论或质疑。

After publication, the Company notified key suppliers, industry partners, and stakeholders by email, welcoming feedback. To date, no negative comments or challenges have been received.

### 三、结论

#### III. Conclusion

2025 年，公司持续完善白银供应链尽职调查管理体系，严格执行供应商准入、风险评估、交易监控与审计披露流程，所有供应商均为低风险，未发现零容忍或高风险供应链。公司将继续秉持负责任采购理念，推动供应链管理向更高标准迈进，重点在以下方面持续改进：

In 2025, the Company continued to improve its silver supply chain due diligence management system, strictly implementing supplier admission, risk assessment, transaction monitoring, and audit disclosure processes. All suppliers were assessed as low-risk, and no zero-tolerance or high-risk supply chains were identified. The Company will continue to uphold the concept of responsible sourcing and drive supply chain management towards higher standards, with continuous improvement in the following areas:

- (1) 加强供应商能力建设，尤其是中小型供应商；
- (1) Strengthening supplier capacity building, especially for small and medium-sized suppliers;
- (2) 深化 ESG 因素在风险评估中的应用；
- (2) Deepening the application of ESG factors in risk assessment;
- (3) 提升追溯系统的数字化水平；
- (3) Enhancing the digitalization level of the traceability system;
- (4) 加强与利益相关方的沟通与透明度。
- (4) Improving communication and transparency with stakeholders.

### 四、其他

#### IV. Others

如对本报告有任何疑问或反馈，请联系：

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