

# 广东金业贵金属有限公司白银供应链风险减缓管理办法

## Guangdong Jinye Precious Metals Co., LTD. Silver supply chain risk mitigation management measures



### 1. 目的:

为了严格遵守国家关于职工权利、环境保护、公平交易等各项法律法规,积极参与白银供应链尽职调查工作,以确保白银来源的合法性。根据《伦敦贵金属市场协会(LBMA)责任白银指南》要求,特制定白银供应链风险减缓管理办法。

### 1. Purpose:

In order to strictly comply with the national laws and regulations on employee rights, environmental protection, fair trade and other laws and regulations, we actively participate in the silver supply chain due diligence work to ensure the legitimacy of the silver source. In accordance with the requirements of the London Precious Metals Market Association (LBMA) Responsible Silver Guide, silver supply chain risk mitigation management measures have been developed.

### 2. 范围

本办法适用于白银供应链尽职调查政策已识别的所有风险。本办法所涉及的白银来源包括粗银、阳极泥等。

### 2: Scope

This Policy applies to all risks identified by the Silver Supply Chain due Diligence policy. The silver sources involved in this method include crude silver, anode mud, etc.

### 3. 术语和定义

本办法中涉及的术语和定义均采用《伦敦贵金属市场协会(LBMA)

责任白银指南》所描述的内容。

### 3. Terms and definitions

The terms and definitions referred to in this Approach are those described in the London Precious Metals Market Association (LBMA) Responsible Silver Guide.

### 4. 风险减缓策略

4.1 所有尽职调查过程中收集的信息以及供应链风险评估内识别的实际以及潜在风险需上报合规组长，再由合规组长整理后上呈合规总监，由合规总监最终确定风险级别。

4.2 若白银供应链尽职调查结果得出以下结论，则需立即对物料进行隔离并上报至有关部门：

- 1) 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，包括最严重的使用童工、酷刑、非人道以及侮辱人格对待方式、广泛的性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；
- 2) 存在向非法的非政府武装组织提供直接或间接支持；
- 3) 存在通过欺诈掩盖白银的原产地；
- 4) 存在洗钱或恐怖主义融资；
- 5) 向非法的公共或私人安全部队提供直接或间接支持；
- 6) 贿赂或非欺诈原因而误导矿产品的原产地；
- 7) 未向政府缴纳应缴税费。

4.3 符合 4.2 的供应商若在 5 个工作日之内仍未提供相关证据，则按风险减缓策略具体步骤实施。

### 4. Risk mitigation strategies

4.1 All the information collected in the due diligence process and the actual and potential risks identified in the supply chain risk assessment shall be reported to the compliance team leader, who shall

organize it and submit it to the Compliance Director, who shall finally determine the risk level.

4.2 If the Silver Supply chain due diligence results in the following conclusions, the material shall be immediately isolated and reported to the relevant authorities:

1) there are systematic or widespread human rights violations related to the extraction, transportation or trade of silver, including the most serious cases of child Labour, torture, inhuman and degrading treatment, widespread sexual violence or other serious violations of human rights forced Labour, war crimes, crimes against humanity or genocide; 2) The existence of direct or indirect support to illegal armed non-governmental organizations; 3) There is fraud to conceal the origin of silver; 4) There is money laundering or terrorist financing;

2) Providing direct or indirect support to illegal public or private security forces; 6) misleading the origin of mineral products by bribery or non-fraudulent reasons; 7) Failure to pay due taxes to the government.

4.3 If the supplier that complies with 4.2 does not provide relevant evidence within 5 working days, the risk mitigation strategy shall be implemented in accordance with the specific steps.

## 5. 风险减缓策略具体步骤

5.1 所有来料到厂后，堆放到指定区域，插上标识牌，注明物料名称、来源地、合同号等信息。

5.2 若白银供应链尽职调查结果存在 4.3 条款所述情况，应对该批物料进行单独堆放，标识牌、料堆不得挪动。合规总监需立即召集相关合规专员开立专项会议，通报与该被评估供应商解除合同关系，同时要求相关合规专员立即实施，并形成书面文件上报上层领导。

再由公司办公室上报相关政府部门。由公司总经理签署退货通知单说明理由，以传真形式通知白银供货商。

- 5.3 若白银供应链尽职调查结果存在 4.2 条款所述，应对该批物料进行单独堆放，标识牌、料堆不得挪动，合规总监需立即召集相关合规专员开立专项会议，通报立即暂停使用该被评估供应商提供的矿产银或回收银，直至其在 5 个工作日之内提供可供证明的额外数据或信息为止：1) 提供证明不存在有关白银提取、运输或贸易的系统性或广泛人权侵犯行为的政府性文件，如被评估供应商所在地相关公安或商务部门出具的合法性证明等；
- 2) 提供并未向非法武装组织提供直接或间接支持的证明文件；
- 3) 提供并未通过欺诈掩盖白银的原产地证明文件，如相关政府部门出具的原产地证明；
- 4) 提供不存在洗钱或恐怖主义融资的证明文件。
- 5) 由相关的合规专员负责收集以上所述额外数据或信息，并按时向合规组长汇报情况进展，合规组长制定监测报告上呈合规总监。若在 5 个工作日之内仍未提供相关证据，则需按 5.2 条款实施。

## 5. Specific steps of risk mitigation strategy

5.1 After all the goods are delivered to the factory, they shall be stacked in the designated area, and the identification plate shall be inserted, indicating the material name, origin, contract number and other information.

5.2 If the due diligence of Silver supply chain results in the situation described in Clause 4.3, the batch of materials shall be stacked separately, and the identification plate and material pile shall not be moved. The

compliance director shall immediately convene the relevant compliance specialist to open a special meeting, report the termination of the contract relationship with the evaluated supplier, and require the relevant compliance specialist to implement it immediately and submit a written document to the upper management. Then the company office reports to the relevant government departments. The general manager of the company should sign the return notice to explain the reason and notify the silver supplier by fax.

5.3 If the due diligence results of the silver supply chain are found as described in Clause 4.2, the batch of materials shall be stacked separately, and the signboards and piles shall not be moved. The compliance Director shall immediately convene the relevant compliance specialists to hold a special meeting and inform them to immediately suspend the use of mineral silver or recovered silver provided by the evaluated supplier. (a) provide governmental documents that demonstrate the absence of systematic or widespread human rights violations related to the extraction, transportation or trade of silver, such as a certificate of legality issued by the relevant public security or commercial authorities in the location of the supplier being evaluated;

2) Provide documentation that it does not provide direct or indirect support to illegal armed organizations;

3) Provide certificates of origin that do not conceal silver through fraud, such as certificates of origin issued by relevant government departments;

4) Provide documentation that there is no money laundering or terrorist financing.

5) The relevant compliance specialist shall be responsible for collecting the additional data or information mentioned above and reporting the progress to the Compliance team leader on time. The

compliance team leader shall prepare a monitoring report and submit it to the Compliance Director. If no relevant evidence is provided within 5 working days, it shall be implemented in accordance with Clause 5.2.

## 6. 整改计划

6.1 在规定时间内提供相关证据的供应商，判为合格供应商，可继续合作。

6.2 在规定时间内未提供相关证据的供应商，判为不合格供应商，中止合作。

6.3 由销售部负责整改计划的下达和验收工作。

6.4 整改计划中应明确整改目标、截止时间，实施进度并向公司高层进行汇报。

## 6. Corrective Plan

6.1 Suppliers that provide relevant evidence within the prescribed time shall be judged as qualified suppliers and may continue to cooperate.

6.2 Suppliers that fail to provide relevant evidence within the prescribed time shall be judged as unqualified suppliers and the cooperation shall be suspended.

6.3 The Sales Department shall be responsible for issuing and accepting the rectification plan.

6.4 Rectification plan shall specify rectification objectives, deadline, implementation progress, and report to senior management of the company.

## 7. 记录

### 7.1 专项会议记

7.2 录退货通知单

7.3 整改计划

7 Record

7.1 Special Meeting Notes

7.2 Record the return notice

7.3 Rectification Plan