

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

白银供应链尽职调查合规报告
Due Diligence Compliance Report of
Silver Supply Chain
(2022 年)
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一、公司简介

I. Company Introduction

广东金业贵金属有限公司（简称“公司”）成立于 2004 年。现坐落于广东省罗定市双东环保工业园区内。公司主要从事生产、加工、销售：有色金属；公司有专业技术人员 40 多人，日均可提纯白银 2 吨多，主要产品有电解银、电解锡、金锭、银锭、银粒，同时还承接来料加工以及销售各类金、银首饰，银制品等业务。

Guangdong Jinye Precious Metals Co., Ltd. (hereinafter referred to as “the Company”), established in 2004, is now located in Shuangdong Environmental Protection Industrial Park, Luoding City, Guangdong Province. The Company has mainly engaged in production, processing and sales: non-ferrous metals; The Company has more than 40 professional and technical personnel, and can purify more than 2 tons of silver per day, with its main products including electrolytic silver, electrolytic tin, gold ingots, silver ingots and silver particles and undertake businesses of incoming materials processing and sales of all kinds of gold, silver jewelry and silver products at the same time.

公司领导班子有勇于改革不断创新的理念有比较完善的生产线和工艺,2004年公司成为上海华通白银交易市场会员单位;7月公司又被“上海黄金交易所”批准为综合类会员单位。2013年6月公司金业“JINYE”牌银锭在“上海期货交易所”成功注册。公司目前获得实用型专利15项,发明专利1项。2016年12月公司被广东省相关职能部门评定为“高新技术企业”,2007年1月广州花都白银精炼厂正式成为上交所可供银锭企业单位。2018年1月被罗定市人民政府评为“第二届罗定市政府质量奖”,同年11月金业“JINYE”牌银锭在伦敦金银市场协会(LBMA)成功注册,成为其注册会员。

The Company's leadership team has always been committed to reform and innovation as well as relatively perfect production lines and technologies. In 2004, the Company became a member unit of Shanghai Huatong Silver Exchange Market. In July, the Company was approved as a comprehensive member unit by the "Shanghai Gold Exchange". In June 2013, the Company's "JINYE" brand silver ingot was successfully registered in the "Shanghai Futures Exchange". Up to now, the Company has obtained 15 practical patents and 1 invention patent. In December 2016, the Company was assessed as a "high-tech enterprise" by relevant functional departments of Guangdong Province. In January 2007, Guangzhou Huadu Silver Refiner officially became an enterprise unit of providing silver ingots for the Shanghai Stock Exchange. In January 2018, it was awarded the "Second Luoding City Government Quality Award" by the Luoding City People's Government. In November of the same year, the "JINYE" brand silver ingot was successfully registered with the London Bullion Market Association (LBMA) and became its registered member.

根据 LBMA 发布的《LBMA 责任白银指南》的要求,公司应对供应商进行严格的尽职调查,以打击系统性或广泛性的侵犯人权行为,避免造成冲突,并遵守高标准的反洗钱和打击恐怖融资行为。公司不断完善白银供应链尽职调查相关的管理政策,并对白银供应商进行了相应的尽职调查。本报告总结了截至 2022 年 12 月 31 日公司遵守 LBMA 责任白银指南的情况。

According to the requirements of the *LBMA Responsible Silver Guidance* issued by LBMA, the Company should conduct strict due diligence investigation for suppliers to combat systematic or widespread human rights violations, avoid conflicts, and comply with high standards of anti-money laundering and terrorist financing. The Company has continuously improved the management policies related to due diligence investigation on the silver supply chain and conducted corresponding due diligence investigation for silver suppliers. The Report summarizes the Company's compliance with the LBMA Responsible Silver Guidance as of December 31, 2022.

二、合规性概述

II. Summary of Compliance

公司对所有供应商进行尽职的供应链调查，要求所有供应商提供的来源合法、合规。

The Company conducts due diligence supply chain investigation on all suppliers and requires all suppliers to provide legal and compliant sources.

第一步：建立强有力的公司管理体系

Step 1: Establish strong company management systems

合规声明与要求：截至 2022 年 12 月 31 日止，公司部分遵守第 1 步的要求，后续通过采取措施，目前关闭审核过程中产生的不符合内容。

Compliance Statement and Requirements: As of December 31, 2022, the company has partially complied with the requirements of Step 1, and has taken measures to close the nonconformities generated during the audit process.

1. 1 负责任的白银尽职调查政策

1.1 Responsible silver due diligence policy

根据《LBMA 责任白银指南》和《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南附件二》（以下简称“经合组织尽职调查指南”）的要求，公司于 2022 年 1 月出台了《广东金业贵金属有限

公司白银供应链尽职调查管理办法》，并于 2022 年 2 月在公司官网（<http://www.gdldjy.com>）发布。同时，公司发布了《广东金业贵金属有限公司白银供应链尽职调查政策声明》，承诺公司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，在白银生产、贸易过程中出现“大规模滥用人权”、“非政府武装团体直接或间接支持的行为”、“对个人（包括政府官员、客户、和供应商或任何其他组织）要求贿赂或者回扣”等行为采取零容忍态度。

In January 2022, the Company issued the *Measures for the Administration of Due Diligence in Silver Supply Chain of Guangdong Jinye Precious Metals Co., Ltd.* and published it on the Company's official website (<http://www.gdldjy.com>) in February 2022 as per the *LBMA Responsible Silver Guidance* and *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Annex II* (hereinafter referred to as the “OECD Due Diligence Guidance”). At the same time, the Company issued the *Due Diligence Policy Statement on Silver Supply Chain of Guangdong Jinye Precious Metals Co., Ltd.*, acknowledged that the Company would strictly abide by the laws and regulations of the state on the rights of employees, environmental protection, fair trade and other laws and regulations, would actively participate in the due diligence work of the silver supply chain, and uphold principle of zero tolerance towards “large-scale abuse of human rights”, “acts directly or indirectly supported by non-governmental armed groups” and “demands for bribes or kickbacks from individuals (including government officials, customers, suppliers or any other organization)” in the process of silver production and trade.

尽职调查管理政策包括适用范围、组织架构和责任、供应商及客户信息的收集、供应链风险识别和评估、供应链交易监控、记录档案的管理、培训和沟通等内容，该政策规定我们有责任开展基于风险的尽职调查、筛选和监控交易以及现行治理结构。该政策规定已获上级批准实施。

The due diligence management policy includes the scope of application, organizational structure and responsibilities, collection of supplier and customer information, identification and assessment of supply chain risks, monitoring of supply chain transactions, management of records, training and communication, etc. The policy stipulates that we have the responsibility to carry out risk-based due diligence investigation, screening and monitoring transactions as well as the current governance structure. The policy has been approved by the superior for implementation.

1.2 尽职调查的内部管理组织机构

1.2.1 Internal management organization of due diligence

公司专门为白银供应链尽职调查成立了合规调查小组，包括公司副总经理刘德权先生（合规总监）、行政部经理覃超伦先生（合规经理），小组成员由购销部、财务部、技术部、生产部等指派。

合规总监：公司授权的高级管理者副总经理刘德权先生。刘德权副总，男，大专学历。自我公司建厂一直为我公司重要高级管理者，且负责公司生产管理工作，对生产管理有着丰富的理论知识和实操经验。

根据 LBMA 负责的白银指南文件，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。

公司副总经理刘德权，重视尽职调查工作，并提供相关的资源支持和尽职调查流程。

Our company has set up a compliance investigation team for the due diligence of silver supply chain, including Mr. Liu De quan (compliance director), the deputy general manager of the company, and Mr. Qin Chao lun (compliance manager), the manager of the administrative department. The team members are appointed by the purchase and sales department, the finance department, the technology department, and the production department, etc.

Compliance director: Mr. Liu Dequan, senior manager and deputy general manager authorized by the company. Liu Dequan, deputy general manager, male, college degree. Our company has been an important senior manager of our company since the establishment of the factory, and is responsible for the company's production management, and has rich theoretical knowledge and practical experience in production management. According to the responsible silver guidance document of LBMA, the relevant staff will be trained to make the relevant responsible person clearly understand the purpose and significance of this system, understand their responsibilities in the implementation of the due diligence policy, and organize the training to review the relevant contents half a year.

Liu De quan, Deputy General Manager of the company, attaches importance to due diligence work and provides relevant resource support and due diligence process.

合规专员 Compliance Officer

公司指定生产部主要负责人为合规总监，负责有关供应链尽职调查管理的所有事项，特别是对供应链尽职调查进行审核，并评估尽职调查是否充分，必要时收集额外文件或信息，确保在高风险供应链或交易内实施相应从事。负责有关责任供应链的员工培训，编制并更新供应链政策，并向高级管理人员提供用于履行职责的适当信息。

The company appoints the main responsible person of the production department as the compliance director, who is responsible for all matters related to the supply chain due diligence management, especially the review of the supply chain due diligence, and the assessment of the adequacy of the due diligence, and the collection of additional documents or information if necessary, to ensure the corresponding implementation in the high-risk supply chain or transaction. Be responsible for the training of employees related to the responsible supply chain, prepare and update the supply chain policy, and provide the senior management with appropriate information for performing their duties.

2022 年 6 月 1 日，合规调查小组召开会议，讨论了公司尽职调查政策及 2022 年 6 月份之前对供应商尽职调查活动开展情况，合规小组成员参加了本次会议。

On June 1, 2022, the compliance investigation team held a meeting to discuss the company's due diligence policy and the implementation of supplier due diligence activities before June 2022. The members of the compliance team participated in the meeting.

公司每年将供应链尽职调查管理、LBMA 负责任的白银指南培训纳入公司年度培训计划当中，通过公司网站、手机微信群、交流以及会议等方式，组织公司相关岗位以及合规小组成员进行培训，确保公司相关岗位以及合规小组成员熟悉供应链尽职调查管理和 LBMA 负责任的白银指南。

The Company incorporates supply chain due diligence management and LBMA responsible silver guidance training into the Company's annual training plan, organize training for employees on relevant positions and members of the compliance team via the Company's website, WeChat group, discussions and meetings, to ensure that employees on relevant positions of the Company and members of the compliance team are familiar with the Supply Chain Due Diligence Management and LBMA Responsible Silver Guidance.

公司定期组织有关于白银相关部门 100% 的员工进行培训，2022 年度共计进行了两次培训。

1. 2022 年 03 月 12 日，LBMA 负责任白银供应链尽职调查表

2. 2022 年 10 月 25 日，白银供应链风险减缓管理办法

培训后进行了效果评价，并且保留培训记录

The company regularly organizes training for 100% of the staff of relevant departments of silver, and has conducted two training sessions in 2022.

1. On March 12, 2022, LBMA Responsible Silver Supply Chain Due Diligence Questionnaire

2. Silver supply chain risk mitigation management measures on October 25,

2022

After the training, the effect was evaluated and the training records were kept.

公司针对本次没有相关培训记录一事，合规总监刘德权先生就此事对记录文员进行相关口头警告，并责令以后相关文件记录要慎重保管，并在 03 月 13—16 日组织相关员工重新进行培训，并重新将记录表保存。

In response to the absence of relevant training records for this time, the compliance director, Mr. Liu Dequan, issued a verbal warning to the recording clerk regarding this matter, and instructed the relevant documents and records to be carefully kept in the future. On March 13th to 16th, the company organized relevant employees to undergo a new training and re save the record form.

2022 年，公司严格执行《供应链尽职调查管理办法》，未按照要求开展供应链尽职调查工作，进行内部问责（例如警告、处罚等）。

本年度，公司未发生因调查工作不力或虚报材料产生的考核处罚事项。

In 2022, the company strictly implemented the "Management Measures for Supply Chain Due Diligence" and failed to carry out supply chain due diligence as required, conducting internal accountability (such as warnings, penalties, etc.).

This year, the company did not encounter any assessment and punishment issues due to poor investigation work or false reporting of materials.

1.2.2 通过官方渠道付款

1.2.2 Payment through official channels

公司在支付货款时，由业务部门发起资金事项联签程序，经过审批通过后，通过公司基本户所在的银行网上付款，并打印银行回单作为凭证附件保留。

When the Company pays for goods, the Business Department initiates a joint signing procedure for capital matters. After approval, the Company pays online through the bank where the Company's basic account is located, and prints the bank receipt to keep it as a voucher attachment.

1.2.3 记录保存

1.2.3 Keep of records.

公司保存供应商营业执照等资质验证资料复印件，保存供应商尽职调查表、每一批次过磅单、水分测定原始记录、检测原始记录、检测报告、结算单等相关记录资料，并且保存 5 年以上。

The Company keeps photocopies of qualification verification data such as the supplier's business license, and keeps relevant records such as the supplier's due diligence questionnaire, weighing lists for each batch, original records of moisture determination, original records of testing, testing reports, settlement documents, etc. for more than 5 years.

1.3 建立内部供应链追溯体系

1.3 Establish an internal supply chain traceability system

1.3.1 供应链追溯体系

1.3.1 Supply chain traceability system

公司根据管理体系要求，确定了供应链追溯体系，在业务过程中，所有的供应商都会被进行资信调查，资信调查通过后签订合同以及供应商社会承诺书，承诺原料合法，符合 LBMA 尽职调查政策；对供应商供应的每一批原料的合同、运输单等进行追溯源地。

根据相关调查政策，来料后进行验收，由购销部、生产部、精炼车间组成验收小组，对原料进行初验，确认是矿银、可回收银类型，验收项目包括、重量、水分、品位等，重量验收有过磅单，水分验收有水分测定原始记录，品位验收有检测报告，过磅单、水分测定原始记录由验收人员和供应商（必要时）签字确认，最终以质检报告形式发给供应商，每个批次的原料分配一个唯一的编号，称重、熔炼、取样、化验，做好每一批次的记录。

生产过程取样化验，最后形成白银产品，打印唯一编号，通过上海黄金交易所或白银客户进行交易。

公司市场部合规专员会调查每个供应商原料的原产地，若有异常立即向合规

风险官报告并拒收。

According to the requirements of the management system, the company has established a supply chain traceability system. During the business process, all suppliers will be subject to credit investigation. After passing the credit investigation, contracts and supplier social commitment letters will be signed, promising that the raw materials are legal and comply with the LBMA due diligence policy; Trace the source of each batch of raw materials supplied by the supplier, such as contracts and transportation documents.

According to relevant investigation policies, acceptance shall be conducted after the incoming materials are received. An acceptance team consisting of the Purchase and Sales Department, the Production Department, and the Refining Workshop shall conduct a preliminary inspection of the raw materials to confirm that they are of the type of mineral silver and recoverable silver. The acceptance items include, weight, moisture, grade, etc. The weight acceptance shall have a weighing sheet, the water content acceptance shall have a original record of moisture measurement, the grade acceptance shall have a testing report, a weighing sheet The original record of moisture measurement shall be signed and confirmed by the acceptance personnel and the supplier (if necessary), and finally sent to the supplier in the form of a quality inspection report. Each batch of raw materials shall be assigned a unique number, weighed, smelted, sampled, and tested, and each batch shall be recorded.

Sampling and testing during the production process, and finally forming a silver product, printing a unique number for trading through the Shanghai Gold Exchange or silver customers.

The compliance officer of the company's marketing department will investigate the origin of each supplier's raw materials, and immediately report any abnormalities to the compliance risk officer and reject them.

1.4 与白银供应商订约

1.4 Engagement with silver supplier

公司购销部原料采购科负责按照《白银供应链尽职调查管理办法》与原料供应商进行沟通。通过沟通，使其及时了解 LBMA 负责的白银供应政策，以及公司白银供应链尽职调查的政策，并告诫供应商需遵循相关政策及程序。并通过提供培训，以协助供应商增强尽职调查能力。

通过充分沟通对供应商进行风险评估，避免与高风险供应商进行合作，若评估为低风险，则由合规专员签字确认，若评估为高风险，合规专员签字确认后由合规小组组长审批（迄今未发现高风险供应商）。

The Raw Material Purchasing Division of the Sales Department of the Company is responsible for communicating with raw material suppliers in accordance with the *Silver Supply Chain Due Diligence Management Measures*, making them understand LBMA responsible silver supply policy and the Company's silver supply chain due diligence policy in a timely manner, and warning suppliers to follow relevant policies and procedures. And provide training to assist suppliers in enhancing their due diligence capabilities.

Conduct risk assessment of suppliers through sufficient communication to avoid cooperation with high-risk suppliers. If the assessment is low risk, it will be signed and confirmed by the Compliance Officer. If the assessment is high risk, it will be approved by the Compliance Team Leader after the signature and confirmation of the Compliance Officer (no high-risk suppliers have been found so far).

在与供应商合作之前，原料采购科会要求所有白银原料供应商签订一份合规声明，确保供应商了解并遵守 LBMA 负责的白银供应指南，以及公司白银供应链政策及要求，降低合作风险。该声明指出，卖方提供的所有原料应符合 LBMA 白银责任指南，避免冲突区域和高风险区域开采、处理进出口金属产品、滥用人权、融资非政府武装实体、违法犯罪团伙、贿赂、欺诈、洗钱等。2022 年与我们合作的国内外所有白银原料供应商均按要求签署了合规声明。公司在遵循相关白银供应指南的同时，也支持实施采掘业透明度行动计划原则，在 2022 年度没

有从在 EITI 国家运营的国有企业处购买的原料。

Before cooperating with suppliers, the Raw Material Procurement Section will require all silver raw material suppliers to sign a compliance statement to ensure that suppliers understand and comply with LBMA's responsible silver supply guidelines, as well as the company's silver supply chain policies and requirements, and reduce cooperation risks. The statement pointed out that all raw materials provided by the Seller should comply with the LBMA Silver Liability Guide to avoid mining in conflict areas and high-risk areas, handling import and export of metal products, abuse of human rights, financing of non-governmental armed entities, illegal criminal groups, bribery, fraud, money laundering, etc. In 2022, all domestic and foreign silver raw material suppliers that cooperated with us signed the compliance statement as required. While following the relevant silver supply guidelines, the company also supports the implementation of the principles of the Extractive Industry Transparency Action Plan. In 2022, it did not purchase raw materials from state-owned enterprises operating in EITI countries.

5 建立机密申诉机制

5 Build confidential grievance mechanism

公司建立了申诉机制，并且申诉机制在含银物料采购过程中均向供应商了必要的沟通，内外部利益相关方可以对政策有疑问或者发现违规行为的可以通过匿名方式（邮件）进行举报反馈在过程中的违规行为。公司设立了意见箱，作为内部员工的举报途径，并由相关人员定期开箱检查汇总举报内容。2022 年度没有举报事件发生。

此外，公司也制定了保护举报人制度，防止对举报人进行打击报复，有效保护举报人的权益。

The company has established an appeal mechanism, and the appeal mechanism has communicated with the supplier in the process of purchasing silver-containing materials. Internal and external stakeholders can report and feedback the violations in

the process by anonymous means (email) if they have questions about the policy or find violations. The company has set up a suggestion box as a reporting channel for internal employees, and relevant personnel regularly open the box to check and summarize the contents of the report. No reported incidents occurred in 2022.

In addition, the company has also formulated a system to protect whistleblowers to prevent retaliation against whistleblowers and effectively protect the rights and interests of whistleblowers.

第二步：识别并评估供应链中的风险

Step 2: Identify and assess risk in the supply chain

第 2 步合规概述：截至 2022 年 12 月 31 日，公司完全遵守第 2 步：识别并评估供应链重的风险。

Step 2 summary of compliance: The Company has fully complied with Step 2: Identify and assess heavy risks in the supply chain as of December 31, 2022.

公司严格遵守 LBMA 白银责任指南第二步“供应链风险的识别与评估”的要求，制定了高风险供应链的判定标准，并对识别出来的风险规定了处理程序，充分对供应链中的风险进行识别和评估。截止到目前，未发现高风险供应链。

The Company strictly abides by the requirements of the step 2 of LBMA Responsible Silver Guidance, “Identify and Assess Supply Chain Risks”, formulates the criteria for determining high-risk supply chains, and stipulates the handling procedures for the identified risks, and fully identifies and assesses the risks in the supply chain. So far, no high-risk supply chain has been found.

1 识别白银供应链内的风险

1 Identify risks in silver supply chain

公司白银全部来源于矿产白银，根据经合组织《来自受冲突影响和高风险地区矿石负责任供应链尽职调查指南》并扩展至环境和可持续性责任，公司识别相关风险，密切关注来自侵犯人权、武装冲突、非法开采、开采利用汞以及源于世

界遗产遗址等地区的白银，以及用于贿赂、洗钱、恐怖主义融资等行为的白银。公司为每个供应商建立供应商档案，根据公司的风险状况进行了调查，在与其签合同之前完成供应商档案的建立工作。

The Company's silver comes entirely from mineral silver. Pursuant to the OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* OECD and environmental and sustainability responsibilities, the Company identifies relevant risks and pays close attention to silver from areas such as human rights violations, armed conflicts, illegal mining, exploitation and utilization of mercury, and World Heritage sites, as well as silver used for bribery, money laundering, terrorist financing, etc. The Company established a supplier file for each supplier, investigated according to the Company's risk situation, and completed the establishment of the supplier file before signing the contract with the supplier.

2 评估供应链风险

2 Assess supply chain risks

2.1 供应链尽职调查

2.1 Supply chain due diligence

公司通过以下措施对供应链进行尽职调查：

The Company conducts due diligence on the supply chain through the following measures:

2.1.1 供应商信息收集

2.1.1 Information collection of suppliers

管理体系中规定了供应商风险识别方法，涵盖了含银物料从原产地到公司的所有风险，通过《供应商尽职调查表》进行风险识别，在与供应商合作之前，购销部负责收集相关供应商信息和资料。对于白银原材料供应商，我们均要求其提供尽职调查表、供应链评估表、营业执照、采矿许可证、营运方式、生产方式、交易合同、第三方查询例如：企查查、中国裁判文书网等，对其合法性进行证明。

对既有供应链客户需定期进行核查，如有新建或变更的客户，需及时对其进行档案资料检查，保持档案资料为处于最新状态；识别每一客户、企业和企业收益所有人，使用可靠的独立来源文件、数据或者信息来验证其身份；购销部还对供应商进行合规性调查，分别向供应商发送问卷调查，以获取相关信息和文件，包括供应商的基本信息、业务活动、管理结构、财务细节和负责的白银供应链等，最后根据搜集的信息和供应链风险识别的结果，对每个供应商进行单独的风险评估，填写风险评估表，由负责评估的合规总监签字，并填写最终评估日期。

The management system specifies the supplier risk identification method, covering all risks of silver-containing materials from the origin to the company. The risk identification is carried out through the Supplier Due Diligence Questionnaire. Before cooperating with suppliers, the Purchase and Sales Department is responsible for collecting relevant supplier information and data. For silver raw material suppliers, we all require them to provide due diligence questionnaire, supply chain evaluation form, business license, mining license, operation mode, production mode, transaction contract, third-party inquiry, such as: enterprise inspection, China Judicial Document Network, etc. to prove their legitimacy. The existing supply chain customers need to be checked regularly. If there are new or changed customers, the archives should be checked in time to keep the archives up-to-date; Identify each customer, enterprise and enterprise revenue owner, and use reliable independent source documents, data or information to verify their identity; The Purchase and Sales Department also conducts compliance surveys on suppliers, and sends questionnaires to suppliers to obtain relevant information and documents, including basic information, business activities, management structure, financial details, and responsible silver supply chain of suppliers. Finally, according to the collected information and the results of supply chain risk identification, each supplier is subject to a separate risk assessment, and a

risk assessment form is completed, The compliance director responsible for the evaluation shall sign and fill in the final evaluation date.

2.1.2 供应商风险识别

2.1.2 Supplier risk identification

根据供应商提供的相关资料及问卷调查结果反馈，购销部开展白银供应链风险识别工作。在风险识别过程中，重点关注供应商是否存在洗钱、恐怖主义融资、侵犯人权滥用劳工等风险事件。

According to the relevant information provided by suppliers and feedback from questionnaire survey results, the Sales Department carries out risk identification of silver supply chain. In the process of risk identification, the focus is on whether suppliers have money laundering, terrorist financing, human rights violations, labor abuse and other risk incidents.

2.1.3 供应商风险评估，建立供应商档案

2.1.3 Supplier risk assessment and establishment of supplier files

风险评估包括国家风险、公司风险和商品风险三个方面。进行交易之前，贸易部门需要对供应商进行风险评估。

- 国家风险包括两个风险问题，例如，含金材料是否来自受冲突影响或侵犯人权的地区，或者是通过该地区运输(参照海德堡晴雨表)。
- 公司风险包括七个风险问题，例如，供应商或其上游公司是否位于与洗钱、犯罪或腐败有关的高风险国家。
- 商品风险共包括五个风险问题，其中一个风险问题是，含金材料的产出、过境或交易运输会途经全球冲突地区或侵犯人权风险高的地区。由非政府武装组织或安全部队直接或间接支持的安全和物流公司，在运输和交易过程中会

遭遇被非法勒索或征税的情况。

Risk assessment includes country risk, company risk and commodity risk. Before the transaction, the trade department needs to conduct a risk assessment on the supplier.

Country risk includes two risk issues, for example, whether gold-bearing materials come from areas affected by conflict or violate human rights, or are transported through the area (refer to Heidelberg barometer).

Corporate risk includes seven risk issues, such as whether suppliers or their upstream companies are located in high-risk countries related to money laundering, crime or corruption.

Commodity risk includes five risk issues, one of which is that the output, transit or trade of gold-bearing materials will pass through global conflict areas or areas with high risk of human rights violations. Security and logistics companies directly or indirectly supported by non-governmental armed organizations or security forces will encounter illegal extortion or taxation in the process of transportation and trading.

针对上述风险事件，按照《尽职调查管理政策》中自产白银供应商和采购白银供应商的步骤进行风险识别和评估。

如果从风险识别和评估中获得的证据不足以排除中高风险供应商的存在或潜在可能性，则必须进行额外的尽职调查。额外的尽职调查程序包括现场走访、调查，以及对白银链尽职调查信息的进一步核实等。

经评估，供应商如果存在上述风险事件，公司会把该供应商定义为高风险供应商，针对高风险供应商公司尽职调查小组会对该供应商进行复审，复审的程序包括实地考察、对尽职调查结果进一步核实等，在高风险事件没有解除之前，公司不会与其建立任何合作关系，在经确认不存在此类高风险事件后，公司才会与之开展正常的合作。

For the above risk events, risk identification and assessment shall be carried out according to the steps of self-produced and purchased silver suppliers in the Due Diligence Management Policy.

If the evidence obtained from risk identification and assessment is not sufficient to exclude the existence or potential possibility of medium-high risk suppliers, additional due diligence must be conducted. Additional due diligence procedures include on-site visits, investigations, and further verification of due diligence information of Silver Chain.

After evaluation, if the supplier has the above risk events, the company will define the supplier as a high-risk supplier, and the due diligence team of the company will review the supplier for high-risk suppliers. The review process includes field investigation, further verification of due diligence results, etc. The company will not establish any cooperation relationship with the supplier until the high-risk events are resolved. After it is confirmed that there is no such high-risk event, The company will carry out normal cooperation with it.

截至2022年12月31日，我们完成了对所有白银供应商的信息收集、风险识别和风险评估任务。将风险评估结果完整记录到相应的伦敦金银市场协会的供应链评估表中，其中包括评估的支持文件、意见和批准日期。

2022年，所有白银供应商均被认定为低风险。

公司从严控供应链风险出发，在合规总监的带领下，就有具体营业场地的供应商进行了实地考察，考察内容包括：业务类型、材料类型、来源地说明、运输方式、上游供应商数量、交易支付方式等。对于单个供应商的实地考察将会每年度至少进行一次。

As of December 31, 2022, we have completed the task of information collection, risk identification and risk assessment for all silver suppliers. The risk assessment

results shall be fully recorded in the corresponding LBMA supply chain assessment form, including the supporting documents, comments and approval date of the assessment. In 2022, all silver suppliers were identified as low risk.

Starting from strict control of supply chain risks, the company conducted a field visit to suppliers with specific business locations under the leadership of the compliance director, including: business type, material type, source description, transportation method, number of upstream suppliers, transaction payment method, etc. Site visits to individual suppliers will be conducted at least once a year.

2.2 高风险供应链

2.2 High risk supply chain

根据 LBMA 和 OECD 相关规定，结合公司实际情况，特规定如下高风险供应链评判标准：

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

(1) 原料银来源于、中转或者运经冲突影响或侵犯人权高风险地区。

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

(2) 原料银声称来源于一个已知储量有限、资源有限或预计白银产量有限的国家。

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

(3) 原料银来源于已知的冲突影响和侵犯人权的高风险地区，或者有理由怀疑经此地区中转的。

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

reason.

(4) 在白银供应链中的公司或者其他已知的上游公司位于一个有着洗钱、犯罪和贪污高风险的国家。

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

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

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

(6) 在白银供应链中的公司或其他已知的上游公司积极参与高风险商业活动，例如武器、赌博、赌业、古董和艺术品、钻石，宗教和宗教领袖。

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

当上述评判标准任何一条客观存在时，则该供应链被判定为高风险供应链，相关合规人员将对所在高风险地区进行 2 次的实地考察及由外部第三方评估人员进行所有各方面进行相关评估后，部门合规小组成员应准备相关尽职调查材料上报合规专员，由合规专员上报合规小组组长（总经理），由合规小组组长（总经理）批准采取应对措施，停止交易，消除风险。

When any of the above evaluation criteria objectively exists, the supply chain will be judged as a high-risk supply chain. After the relevant compliance personnel will conduct two field visits to the high-risk area and the external third-party assessors will conduct all aspects of the relevant assessment, the department compliance team members should prepare relevant due diligence materials and report them to the compliance specialist, who will report them to the compliance team leader (general

manager), The compliance team leader (general manager) shall approve and take countermeasures to stop trading and eliminate risks.

2.3 交易监测

2.3 Transaction monitoring

公司对所有交易情况进行监督，确保交易与供应链调查一致。

The Company monitors all transactions to ensure that the transactions are consistent with the supply chain investigation.

公司对供应链尽职调查进行检查，每批原料编号唯一，对于所有的原料采购入库均保留完整的单据资料，对于入库保存有过磅单、水份测定记录、品位检测报告、结算单、财务凭证等。明确各个部门应在日常工作中收集保存的资料，由销售部、财务部、技术部、生产部对相关单据进行保存，并定期将相关资料送至档案室进行存档，保存期限不少于 5 年。

The Company checks the due diligence of the supply chain. Each batch of raw materials has a unique number. For all raw materials purchased and put into storage, complete documents and data are kept. Weighing lists, moisture measurement records, grade detection reports, settlement forms, financial vouchers, etc. should be put into storage. It is clear that each department should collect and preserve the data in its daily work. The Sales Department, Finance Department, Technology Department and Production Department shall preserve the relevant documents and regularly send the relevant data to the archives for archiving for a period of not less than 5 years.

3 向高级管理层报告风险评估

3 Reporting risk assessments to senior management

公司建立风险评估报告制度，每月合规专员对部门尽职调查工作报合规小组组长。当供应链调查发现来自高风险区域，被评估为高风险供应链时，停止该交易并上报合规小组组长（总经理）审批。

The Company establishes a risk assessment report system, and the Compliance Officer reports the due diligence work of the department to the compliance team leader every month. When it is found in the supply chain investigation that it comes from a high-risk area and is assessed as a high-risk supply chain, the transaction should be stopped and reported to the Compliance Team Leader (General Manager) for approval.

第三步：设计和实施应对已识别风险的策略

Step 3: Design and implement a strategy to respond to identified risks

步骤 3 的合规性概述：在截至 2022 年 12 月 31 日，公司完全遵守了步骤 3：设计和实施应对已识别风险的策略。

Step 3 Summary of compliance: The Company has fully complied with Step 3: design and implement a strategy to respond to identified risks as of December 31, 2022.

公司建立了文件化的《风险缓解策略》，合规官负责缓解策略的落实工作，主要通过以下方式进行风险管理：
高风险供应商：如果供应链尽职调查结果得出的结论是，存在洗钱、恐怖主义融资、严重的侵犯人权、直接或间接支持非法的政府武装组织或通过欺诈误导矿产品的原产地，我们将立即停止与该供应商交易，对已交易的贵金属数量进行核实并封存，并上报至最高管理层。

如果供应链尽职调查结果得出的结论是，可能存在洗钱、恐怖主义融资、严重的侵犯人权、直接或间接支持非法的政府武装组织或通过欺诈误导矿产品的原产地，我们将立即暂停与该供应商交易，对已交易的贵金属数量进行核实并封存，

对该供应商进行强化尽职调查，通过实地考察、委托有能力的第三方或有资质的人员对该供应商进行现场审核，出具审核报告，若现场审核的结果为高风险供应商，则停止交易并上报有关部门；若该供应商无重大风险且愿意配合整改，则监督该供应商在六个月内整改至满足 LBMA 准则的要求，可以继续进行交易。

若在六个月内无法整改至满足要求，则停止交易。如果尽职调查的结果无法充分满足要求，不能为风险评估提供有效的证据，缺少相关资质证明，如营业执照、采矿许可证、进出口相关单据、贵金属原产地、运输方式等，则暂停与该供应商的交易，直至提供完整的资料并通过了风险评估。

非高风险供应商：不存在洗钱、恐怖主义融资、严重的侵犯人权、直接或间接支持非法的政府武装组织或通过欺诈误导矿产品的原产地等零容忍问题，并且提供了所有的相关尽职调查的资料，通过风险评估，结论为非高风险供应商，则继续进行交易，并定期对其进行风险监控。

The company has established a documented Risk Mitigation Strategy, and the compliance officer is responsible for the implementation of the mitigation strategy, and carries out risk management mainly through the following ways: high-risk suppliers: if the supply chain due diligence results conclude that there are money laundering, terrorist financing, serious human rights violations, direct or indirect support for illegal government armed organizations or misleading the origin of mineral products through fraud, We will immediately stop trading with the supplier, verify and seal the quantity of precious metals traded, and report to the top management. If the supply chain due diligence results conclude that there may be money laundering, terrorist financing, serious human rights violations, direct or indirect support for illegal government armed organizations or misleading the origin of mineral products through fraud, we will immediately suspend the transaction with the supplier, verify and seal the quantity of precious metals traded, and conduct enhanced due diligence on the supplier. Entrust a competent third party or qualified personnel to conduct on-site audit on the supplier and issue an audit report. If the

result of on-site audit is a high-risk supplier, stop the transaction and report to the relevant department; If the supplier has no major risk and is willing to cooperate with the rectification, the supplier can be supervised to make rectification within six months to meet the requirements of LBMA standards and can continue to trade. If it cannot be rectified to meet the requirements within six months, the transaction will be stopped. If the results of due diligence cannot fully meet the requirements, provide effective evidence for risk assessment, and lack relevant qualification certificates, such as business license, mining license, import and export related documents, origin of precious metals, mode of transportation, etc., the transaction with the supplier will be suspended until complete information is provided and the risk assessment is passed. Non-high-risk suppliers: there are no zero-tolerance problems such as money laundering, terrorist financing, serious human rights violations, direct or indirect support for illegal government armed organizations or misleading the origin of mineral products through fraud, and they have provided all relevant due diligence information. After risk assessment, if they are concluded to be non-high-risk suppliers, they will continue to conduct transactions and conduct regular risk monitoring.

购销部作为持续尽职调查的一个部门，在供应商选择和合作上，需要持续关注合作风险，并进行风险评估。如果发现低风险供应商现有的正常合作可能涉及洗钱和恐怖融资、促进冲突、侵犯人权，应立即停止原料采购并开展相关调查。如果有确凿证据证明供应商涉及洗钱和恐怖融资、促进冲突、侵犯人权，公司应立即停止采购，终止合作关系。截至 2022 年 12 月 31 日，我们已完成了 2022 年所有白银原料供应商的风险识别和风险评估。2022 年未发现高风险白银供应链，因此未采取供应链风险减缓措施。

As a department of continuous due diligence, the Sales Department needs to continuously pay attention to the cooperation risks and carry out risk assessment in supplier selection and cooperation. If it is found that the existing normal cooperation of low-risk suppliers may involve money laundering and terrorist financing, intensify

conflicts and violate human rights, the purchase of raw materials should be immediately stopped and relevant investigations should be carried out. If there is conclusive evidence that the supplier is involved in money laundering and terrorist financing, intensified conflicts and violation of human rights, the Company should immediately stop purchasing and terminate the cooperation relationship. As of December 31, 2022, we have completed the risk identification and risk assessment of all silver raw material suppliers in 2022. No high-risk silver supply chain was found in 2022, so no supply chain risk mitigation measures were taken.

定期报告：每季度合规专员根据 LBMA 管理的实际情况，向合规总监和最高管理层提交汇报。报告本季度 LBMA 管理体系运行情况总结，提出不足及改进措施。

2022 年，公司采取了量化的手段对供应商进行评分管理，对除新供应商外的所有供应商进行年度补充风险评估。合规总监已对评估结果进行审核。并且每季度向最高管理层提交了报告。

Regular report: The compliance officer submits a report to the compliance director and the top management according to the actual situation of LBMA management every quarter. The report summarizes the operation of LBMA management system in this quarter, and puts forward deficiencies and improvement measures. In 2022, the company took quantitative measures to score suppliers and conduct annual supplementary risk assessment for all suppliers except new suppliers. The compliance director has reviewed the evaluation results. And submitted a report to the top management every quarter.

第四步：安排对供应链的尽职调查进行独立第三方审计

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

第 4 步的合规性概述：公司已完全遵守第 4 步：对白银供应链的尽职调查进行独立第三方审计。

Step 4 summary of compliance: the Company has fully complied with Step 4: Arrange for an independent third-party audit of the supply chain due diligence.

公司严格遵守 LBMA 白银责任指南第四步“对精炼商的尽职调查实践开展独立的第三方审计”的要求。上一次审计时间为 2022 年 03 月，审核报告已经上传至我司官方网站 <http://www.gdldjy.com/>。

The Company strictly abides by the requirements of Step 4 of LBMA Responsible Silver Guidance, “Independent Third Party Auditing of Refiners’ Due Diligence Practices”. The last audit took place in March 2022, and the audit report has been uploaded to our official website <http://www.gdldjy.com/>.

本年度我们将继续请必维认证（北京）有限公司进行合理鉴证，本年度的审计将参照 ISAE3000 的方法执行。公司与必维认证（北京）有限公司（以下简称“必维认证”）签订了一份协议，委托 BV 依据 ISAE3000 进行了 2022 年度的合理保证鉴证业务，对我们遵守 LBMA 责任白银指南的合规性进行独立第三方审计。当前审核周期中并没有发现的高风险和中风险不符合项。独立鉴证报告见附件。

This year, we will continue to engage Bureau Veritas Certification (Beijing) Co., Ltd. to carry out reasonable verification, and this year’s audit will be carried out according to ISAE3000 method. The Company has signed an agreement with Bureau Veritas Certification (Beijing) Co., Ltd. (hereinafter referred to as “Bureau Veritas Certification”) to entrust BV to carry out reasonable assurance and verification business in 2022 according to ISAE3000, and to conduct an independent third-party audit on our compliance with LBMA Responsible Silver Guidance. High-risk and

medium-risk non-conformances not found in the current audit cycle. See the annex for the independent verification report.

第五步：每年报告一次供应链尽职调查

Step 5: Report on supply chain due diligence once a year

第 5 步的合规性概述：公司完全遵守了第 5 步：供应链尽职调查年度报告。

Step 5 summary of compliance: The Company has fully complied with Step 5: Report on supply chain due diligence.

公司根据 LBMA 责任白银指南发布了《广东金业白银尽职调查合规报告（2022 年）》，以报告截至 2022 年 12 月 31 日的供应链尽职调查情况。

Pursuant to LBMA Responsible Silver Guidance, the Company issued the Guangdong Jinye Silver Due Diligence Compliance Report (2022) to report on the supply chain due diligence as of December 31, 2022.

三、管理结论

III. Management Conclusion

截至 2022 年 12 月 31 日，公司建立了供应链过程和控制的管理体系，发布并实施了尽职调查管理政策。公司还收集了所有供应商信息，识别和评估了供应链中的风险，制定了风险控制措施，安排对供应链尽职调查进行独立第三方审计，并在 2022 年编制了供应链尽职调查报告。因此，在过去一年里公司完全遵守了 LBMA 责任白银指南。在下一阶段的工作中，公司致力于在现有白银供应链尽职调查制度的基础上持续改进，并将负责的白银供应链流程与我们现有的供应链流程更有效地结合起来，将定期对发现的任何纠正措施进行内部监控。

As of December 31, 2022, the Company has established a management system of supply chain process and control, issued and implemented a due diligence management policy. The Company also collected all supplier information, identified and evaluated risks in the supply chain, formulated risk control measures, arranged an

independent third-party audit of supply chain due diligence, and prepared a supply chain due diligence report in 2022. Therefore, in the past year, the Company has fully complied with the LBMA Responsible Silver Guidance. In the next stage of work, the Company will remain committed to continuous improvement on the basis of the existing silver supply chain due diligence system, and will more effectively combine the responsible silver supply chain process with our existing supply chain process, and will regularly carry out internal control on any corrective measures found.

四、其他

IV. Others

如果本报告用户希望就本报告向广东金业贵金属有限公司进行任何反馈, 则可以通过拨打+86 0766-3829080 或发送电子邮件至 gdjinye@sina.com, 联系公司相关部门。

If users of this report wish to provide any feedback to Guangdong Jinye Precious Metals Co., Ltd. with respect to this report, feel free to contact relevant departments of the Company by telephone +86 0766-3829080 or E-mail gdjinye@sina.com.