广东金业贵金属有限公司
Guangdong Jinye Precious Metals Co., Ltd.
白银供应链合规报告
Compliance Report of Silver Supply Chain
(2024)

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公司名称 Company Name	广东金业贵金属有限公司 Guangdong Jinye Precious Metals Co., Ltd.
位置 Location	中国广东省罗定市双东街道龙宝路 189 号 No.189 Longbao Road, Shuangdong Street, Luoding City, Guangdong Province,CHINA
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报告负责人 Person responsible for	范才总经理 General Manager, Mr.Fan Cai

一、公司简介

I. Company Profile

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 30 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。公司是上海黄金交易所可提供标准银锭企业和上海期货交易所银锭品牌注册企业。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.

二、供应商情况

II. Supplier status

根据LBMA发布的《LBMA责任白银指南》第二版的要求，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2024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 Ver.2 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, 2024.

公司主要原料来源为国内矿山物料和回收银中提炼白银，2024年度公司对所有供应商进行尽职供应链调查，要求所有供应商银原料来源合法、合规,所有供应商经过评估均为低风险供应商。

The main raw materials of the company are domestic mine materials and silver extracted from recycled silver. In 2024, the company will conduct due diligence supply chain survey on all suppliers, requiring all suppliers to have legal and compliant sources of silver raw materials, and all suppliers are assessed to be low-risk suppliers.

三、合规性概述

Ⅲ Compliance Overview

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：截至 2024 年 12 月 31 日止,公司已经完全遵守第 1 步的要求：建立强有力的公司管理体系，确保白银供应链尽职调查工作全面落地。

Compliance Statement: As of December 31, 2024, the Company has fully complied with the requirements of Step 1: establishing a strong corporate management system to ensure the full implementation of Silver supply chain due diligence.

1.1 负责任的白银供应链尽职调查政策

1.1 Policy for responsible silver due diligence

供应链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。

The Supply Chain Due Diligence Management Policy, which includes 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, establishes our responsibility to conduct risk-based due diligence, screen and monitor transactions, and the current governance structure.

2024 年为了建立适当的供应链尽职调查政策和治理结构，监督预防和减轻冲突矿产和/或不利的环境、社会和治理（ESG）因素在公司供应链中的风险，公司根据《负责任的白银指南》第 2 版更新白银供应链尽职调查的政策，明确尽职调查流程和调查范围，使得采购政策有据可查，政策明确指出采购不应涉及所有威胁性融资风险，包括经济合作与发展组织附件二所列风险(包括:主要包括国家间贸易壁垒增加、地缘政治和政策不确定性对投资和家庭支出造成压力，以及这些因素对全球经济增长和通胀的影响)及白银供应链中需考虑的环境因素(包括:1 资

源保护与污染防控2.可持续采购与合规性)、社会因素(包括:1.劳工权益与社区关系2.供应链透明度与多样性)和治理（ESG）因素(包括:1.企业治理与风险管理2.信息披露与标准统一)。

In order to establish an appropriate supply chain due diligence policy and governance structure to oversee the prevention and mitigation of risk from conflict minerals and/or adverse environmental,social and governance (ESG) factors in the Company's supply chain in2024,the Company updated its Silver supply chain due diligence policy in accordance with the Responsible Silver Guide,Edition 2,to clarify the due diligence process and scope of the investigation. Make procurement policies well documented and make it clear that procurement should not involve all threatening financing risks, including those listed in Annex II of the Organization for Economic Cooperation and Development(including, inter particular, increased trade barriers between countries,geopolitical and policy uncertainty weighing on investment and household spending),And the impact of these factors on global economic growth and inflation)and environmental considerations in the silver supply chain(including:1 Resource conservation and pollution control2.Sustainable sourcing and compliance),social factors (including:1.Labour rights and community relations 2.Supply chain Transparency and Diversity) and governance (ESG) factors (including :1. Corporate governance and risk management 2.Information disclosure and standard unification).

公司2025年度修订的第四版《LBMA负责任白银供应链尽职调查管理办法》于2025年1月15日，通过了合规总监李天顺批准，并在公司官网（http://www.gdldjy.com/upLoad/news/baiyingongyingshanguanlizhengceshuanyuban.pdf）上予以公布，确保了公司白银尽责体系的有效运行。公司对政策每年进行审查一次，并在情况需要时进行更新。

The fourth edition of the Company's 2025 revised "LBMA Responsible Silver Supply Chain Due Diligence Management Measures"was approved by Compliance Director Li Tianshun on January 15, 2025.And be published on the company's official website (http://www.gdldjy.com/upLoad/news/baiyingongyingshanguanlizhengceshuanyuban.pdf),ensure the effective operation of the company silver responsible system.The policy is reviewed annually and updated as circumstances warrant.

政策要求公司及其供应商严格遵守国家关于职工权利、环境保护、可持续发展、公平交易等各项法律法规，积极参与供应链尽职调查工作，确保矿产银来源符合LBMA尽职调查管理要求，并作出承诺，拒绝来自侵犯人权、支持非法非国家武装团体或公共或私人安全部队行为、贿赂、不遵守政府税收、费用和使用费的规定、洗钱、助长冲突、不遵守环境和可持续发展法律要求、冲突地区、恐怖主义融资、非法开采、世界遗产遗址、采用汞开采等高风险地区的白银。

The policy requires the company and its suppliers to strictly abide by the national laws and regulations on employee rights,environmental protection,sustainable development,fair trade and other laws and regulations,actively participate in the supply chain due diligence work, ensure that the source of mineral silver meets the LBMA due diligence management requirements,and make commitments.Reject silver from high-risk areas such as human rights violations,support for illegal non-state armed groups or public or private security forces,bribery,non-compliance with government regulations on taxes,fees and user fees, money laundering,fuelling conflict,non-compliance with environmental and sustainable development legal requirements,conflict zones,terrorist financing,illegal mining,World Heritage sites,and mercury mining.

1.2 尽职调查的内部管理机构

1.2 Internal management organization of due diligence

公司根据《白银供应链尽职调查管理制度》及经合组织尽职调查指南附件二建立内部管理体系，对供应链尽职调查方案的实施和持续改进提供有效监督，明确了管理岗位以及对应的职责，董事会在公司内部设立尽职调查小组、合规总监、合规官、合规专员。

The company has established an internal management system in accordance with the Silver Supply Chain Due Diligence Management System and Annex II of the OECD Due Diligence Guidelines,provided effective supervision over the implementation and continuous improvement of the supply chain due diligence program,defined the management positions and corresponding responsibilities,and the Board of Directors has set up a due diligence team,compliance director,compliance officer and compliance specialist within the company.

公司专门为白银供应链尽职调查成立了合规调查委员会小组，包括公司副总经理李天顺先生（合规总监）、业务部经理范锦平先生（合规经理），小组成员由购销部、财务部、技术部、生产部等指派。合规调查小组负责审批供应链尽职调查政策和制度、合规报告,负责通过合规调查小组的成立、各种信息收集渠道(国家企业信用信息公示系统、裁判文书网)、技术工具与平台、专业财务分析能力、参考信用评级机构报告、行业协会专家数据等足够的资源支持开展供应链尽职调查流程和系统的运行和监控。

The company has set up a compliance investigation Committee team specifically for the due diligence of the silver supply chain,including Mr. Li Tianshun,deputy general manager of the company (Compliance Director), and Mr.Fan Jinping,manager of the Business Department (Compliance manager). The team members are appointed by the Purchase and Sales Department,Finance Department,Technology Department,Production Department,etc.The Compliance Investigation team is responsible for approving supply chain due diligence policies and systems,compliance reports,Responsible for the establishment of the compliance investigation team,various information collection channels(National Enterprise credit information Publicity system, Judgment document network),technical tools and platforms, professional financial analysis ability,reference to credit rating agency reports,industry association expert data,etc.and sufficient resources to support the operation and monitoring of the supply chain due diligence process and system.

广东金业贵金属有限公司授权的高级管理者（合规总监）由高级管理者副总经理李天顺先生担任,自我公司建厂李天顺先生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 10 多年的丰富的理论知识和实操经验，为大家提供培训，以有效监督负责任采购活动的落实。业务部经理兼合规经理范

锦平先生其毕业于西南财经大学市场营销专业，从事经营采购营销管理工作十多年,拥有丰富的实践经验。合规总监李天顺负责主持公司日常供应链尽职调查工作，建立健全供应链尽职调查管理体系，监督供应链尽职调查流程，报告公司风险评估、应对和实施等情况，监督、检查各部门的落实情况并考核，汇报供应链尽职调查中的异常情况，协调处理供应链尽职调查中的异常情况，合规报告的审批和组织培训等工作。合规经理范锦平负责根据公司原料采购政策负责组织做好采购含银原料的计量、化验及白银产品化验工作；做好白银供应链制度的起草、更新、审批工作。

The senior manager (Compliance Director) authorized by Guangdong Jinye Precious Metals Co., Ltd. is Mr. Li Tianshun,senior manager and deputy general manager.Mr. Li Tianshun has been an important senior manager of our company and is responsible for the production management of the company. He has more than 10 years of rich theoretical knowledge and practical experience in production management and provides training for everyone. To effectively monitor the implementation of responsible procurement activities.Business Department Manager and Compliance Manager Mr. Fan Jinping graduated from Southwest University of Finance and Economics, majoring in marketing,engaged in business procurement marketing management for more than 10 years,has a wealth of practical experience.Compliance Director Li Tianshun is responsible for presiding over the company's daily supply chain due diligence work,establishing and improving the supply chain due diligence management system,supervising the supply chain due diligence process,reporting the company's risk assessment, response and implementation, supervising and checking the implementation and assessment of various departments, and reporting abnormal situations in the supply chain due diligence.Coordinate and handle abnormal situations in supply chain due diligence,approval of compliance report and organize training etc.Compliance Manager Fan Jinping is responsible for organizing the measurement,testing and testing of silver-containing raw materials and silver products according to the company's raw material procurement policy;Do a good job in drafting,updating and approving the silver supply chain system.

合规专员由由购销部、财务部、技术部、生产部等指派，根据各自分管职责，严格执行供应链尽职调查措施和零容忍、高风险供应链评判标准，收集并保存足够的供应链证明文件，建立供应商尽职调查档案，并定期对重要供应商进行现场调查。

Compliance specialists are appointed by the Purchase and Sales Department,Finance Department,Technology Department,Production Department,etc.According to their respective responsibilities,they strictly implement supply chain due diligence measures and zero-tolerance, high-risk supply chain evaluation standards,collect and keep sufficient supply chain certification documents,establish supplier due diligence files,and regularly conduct on-site investigations on important suppliers.

设置于采购部门（即业务部）的合规专员负责在签订合同前组织实施对供应商进行评估，监督与合格供应商的交易，并逐年进行重新评估。在业务谈判和原料采购过程中贯彻和落实 LBMA 的白银尽职理念。

The Compliance specialist located in the Procurement Department(the Business Department)is responsible for organizing the implementation of supplier evaluations prior to contract signing,monitoring transactions with qualified suppliers,and re-evaluating them on a yearly basis.Implement and implement LBMA's Silver due diligence philosophy in the process of business negotiation and raw material procurement.

设置于综合部的合规专员负责培训，并协助合规风控官制定公司尽责管理的各项制度建设。公司每年将供应链尽职调查管理培训以及 ESG 相关内容加指南披露、合格交割清单规则等纳入公司年度培训计划当中，组织公司重点岗位（如：仓管部、业务部、财务部、质量管理部、中心化验室、生产主要成员进行培训，培训率 100%、参与率 100%。）以及合规专员对供应链尽职调查管理的要求，主要基于 LBMA 负责任白银指南进行培训，确保供应链尽职调查管理工作落到实处。2024 年我公司在公司定期组织有关于白银相关部门 100%的员工进行培训，2024 年度共计进行了两次培训。

The Compliance specialist located in the General Department is responsible for training and assisting the compliance risk control Officer to develop various systems for the company's due diligence management. Every year,the company includes supply chain due diligence management training and ESG related content plus guideline disclosure and qualified delivery list rules into the company's annual training plan,and organizes key positions of the company(such as warehouse management department, business department,finance department,quality management department, central laboratory and key members of production to conduct training,with a training rate of 100% and participation rate of 100%).As well as the requirements of the compliance officer on supply chain due diligence management,the training is mainly based on the LBMA Responsible Silver Guide to ensure the supply chain due diligence management is implemented.In 2024,our company regularly organized training for 100% of the employees of silver-related departments,and conducted two trainings in 2024.

1.2024 年 03 月 12 日，进行 LBMA 负责任白银指引版本升级培训、LBMA 负责任白银供应链尽职调查培训

1.On March 12, 2024,LBMA Responsible Silver Guideline version upgrade training and LBMA responsible silver supply chain due diligence training were conducted.

2.2024 年 12 月 16 日，进行白银供应链风险减缓管理办法;披露指南的培训，OECD 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,制裁国家以及工具的运用等培训

2.On December 16, 2024,silver supply chain risk mitigation management measures were implemented;Training on disclosure guidelines,OECD guidelines on responsible supply chain due diligence for ores from conflict-affected and high-risk regions,sanctioning countries and the use of tools.

培训内容包括如 LBMA 负责任的白银第二版、OECD 经合组织的指南文件、识别风险地区工具 CAHRAS 的使用查询方法、相关制裁国家的工具包使用以及 ESG 相关信息资料的学习、相关披露准则。每次培训均邀请业务合作单位代表现场参与或视频会议，此类培训旨在帮助有关员工和供应商深入了解白银供应链尽职调查管理制度和相关工具包、尽职管理政策、制度、流程、披露指南。培训现场通过互

动提问的方式，整体达到良好的培训效果。

The training includes,for example,the LBMA Responsible Silver Edition 2,the OECD Guidance document,the use of the CAHRAS tool for identifying risk areas,the use of the toolkit for relevant sanctions countries,and the learning of ESG-related information materials and relevant disclosure guidelines.Each training invites representatives of business partners to participate on-site or via video conference.Such training is designed to help relevant employees and suppliers gain an in-depth understanding of the Silver Supply Chain due diligence management system and related toolkits,due diligence management policies,systems,processes,and disclosure guidelines.The training site through the way of interactive questioning, the whole to achieve good training results.

设置于财务的合规专员，负责供应商销售及代加工的合同审批，从财务专业的角度把控合同和资金；对相关的业务、资金活动进行监督，2024 年支付和接收都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，未进行任何现金收付。

Compliance specialist in finance,responsible for supplier sales and processing contract approval, from the perspective of finance professional control of contracts and funds;Supervise related business and capital activities.In 2024,the payment and receipt will be made online through the bank where the company's basic account is located, and the bank receipt will be printed as a voucher attachment,without any cash receipt and payment.

设置于仓管部的合规风控专员，负责收集并保存足够的白银供应链证明文件，负责核实并记录每一批收到的产品信息，物料流转过程和重量的记录，保存化验报告，监督物料的标识和贮存；每一批次的货物移交单、化验单、结算单、银行转账等相关记录保存 5 个财年以上。

The compliance risk control specialist located in the warehouse Management Department is responsible for collecting and keeping sufficient documentation of the silver supply chain,verifying and recording the product information received in each batch, recording the material flow process and weight,keeping laboratory reports,and supervising the identification and storage of materials;Each batch of goods delivery, laboratory inspection, settlement,bank transfer and other related records are kept for more than 5 fiscal years.

2024 年，公司提供了人力、财力等必备的资源和技能来支持和监测尽职调查流程工作。小组相关负责成员严格执行《供应链尽职调查管理办法》，按照要求开展供应链尽职调查工作，调查所有供应商资质，监控所有交易，未与零容忍供应链和高风险供应链建立关系。同时，所有原料采购业务均签订合同、供应商承诺书（作为合同附件），合同严格按照公司规定的审批流签订，所有供应商均承诺原料来源符合白银指南要求。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 2024,the company provided the necessary resources and skills, including human and financial resources,to support and monitor the due diligence process.The relevant responsible members of the team strictly implemented the Supply Chain Due Diligence Management Measures,carried out supply chain due diligence as required,investigated the qualifications of all suppliers,monitored all transactions,and did not establish relationships with zero-tolerance supply chain and high-risk supply chain. At the same time, all raw material procurement business has signed contracts and supplier commitment letters (as attachments to the contract),and the contracts are signed in strict accordance with the approval flow stipulated by the company,and all suppliers promise that the raw material sources meet the requirements of the Silver Guide. This year,the company did not occur due to poor investigation work or false reporting of materials assessment penalties.

1.3 建立内部强有力的内部可追溯体系

1.3 Establish an internal supply chain traceability system

公司会进行对所有的供应商都会被进行资信调查，通过尽职调查问卷收集和审查供应商资质、业务运营、股东信息和物料来源等资信调查通过后签订合同，约定原料合法，符合 LBMA 尽职调查政策；填写 KYC 问卷，尽职调查完成后签订

合同并要求供应商出具《承诺书》，承诺原料合法合规，符合《供应链尽职调查管理制度》要求。

The company will conduct credit investigation on all suppliers,collect and review supplier qualification,business operation,shareholder information and material sources through due diligence questionnaires,and sign a contract after passing the credit investigation,agreeing that the raw materials are legal and comply with the LBMA due diligence policy.Fill in the KYC questionnaire,sign the contract after the completion of due diligence, and ask the supplier to issue a letter of commitment,promising that the raw materials are legal and compliant,and meet the requirements of the Supply Chain Due Diligence Management System.

公司已建立了一套供应链可追溯体系，根据《LBMA 负责任的白银指南》中对贵金属各种来源进行识别，每一批移交我公司的原料均有台账记录，包括供应商名称、原产地、材料类型、移交日期、移交重量、成色等。每一批出库标准银锭均分配唯一编号，并有出库台账记录，包括出库日期、出库重量等。

The company has established a supply chain traceability system to identify various sources of precious metals according to the LBMA Responsible Silver Guide,and each batch of raw materials transferred to our company is recorded in a ledger,including supplier name,origin, material type,delivery date,delivery weight,finish,etc.Each batch of outgoing standard silver bullion is assigned a unique number,and there is an outgoing account record,including the outgoing date,outgoing weight,etc.

1.3.1 来料

1.3.1 Imported Material

我公司拥有专业的运输团队，负责从供应商处接洽原料到精炼厂。在这过程中，合规专员会根据来料地址、发货地址进一步排除风险，跟踪运单号，对产品的原产地证明、可回收和原始库存的原产地证明进行追溯，若有异常会立即报告给合规官并拒收、拒发原料或隔离原料。到厂的银料由验收人员再复核，每批次原料给一个唯一的编号，由生产人员在熔铸过程中取样。相关人员记录到达的日期和精炼加工及出库过程结束的日期。

Our company has a professional transportation team,responsible for contacting raw materials from suppliers to refineries.In this process,the compliance specialist will further eliminate risks according to the incoming address and delivery address,track the waybill number,trace the certificate of origin of the product,the certificate of origin of the recyclable and the original stock,and immediately report to the compliance Officer and reject,reject or isolate the raw material if there is any abnormality.The silver material to the factory shall be reviewed by the acceptance personnel.Each batch of raw material shall be given a unique number and sampled by the production personnel during the melting and casting process.The relevant personnel record the date of arrival and the date of completion of the refining and warehousing process.

2024 年度来料，发货按照上述各项管理方法、程序进行了严格的管理，尚未发现零容忍供应链和高风险供应链。

The incoming materials and shipments in 2024 have been strictly managed in accordance with the above management methods and procedures,and zero tolerance supply chain and high-risk supply chain have not been found.

1.3.2 过程监控追溯

1.3.2 Process monitoring

合同签订前，公司采购部门负责按照《白银供应链尽职调查管理办法》与供应商进行沟通。通过沟通，使其及时了解 LBMA 负责任的白银供应政策，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。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。根据供应链尽职调查管理制度进行调查，填写 KYC 问卷，对供应链进行初步调查,确定其原产地的风险程度。调查完毕后，签订合同，同时将《供应商承诺书》作为合同的附件，一并进行签署盖章，让供应商承诺原料合法合规，符合《负责任的白银指南》要求。

Before signing the contract,the procurement department of the company is responsible for communicating with suppliers in accordance with the "Silver Supply Chain Due Diligence Management Measures".Communicate to keep them informed of the LBMA's responsible silver supply policy and the company's silver supply chain due diligence policy,and advise suppliers to follow relevant policies and procedures.Conduct risk assessment of suppliers through adequate communication and avoid working with high-risk suppliers.Conduct an investigation according to the supply chain due diligence management system,fill out KYC questionnaires,and conduct a preliminary investigation of the supply chain to determine the degree of risk of its origin.After the investigation is completed,the contract is signed, and the Supplier Commitment Letter is signed and sealed as an annex to the contract,so that the supplier promises that the raw materials are legal and compliant,and meet the requirements of the Responsible Silver Guide.

公司建立了一套供应链可追溯体系，每一批移交我公司原料均有台账记录，包括供应商名称、移交日期、移交重量、成色等。每一批出库标准银锭均分配唯一编号，并有出库台账记录，包括出库日期、出库重量等，所有经公司审核的出库流向风险可控。

The company has established a set of supply chain traceability system, and each batch of raw materials transferred to our company has a ledger record,including supplier name,transfer date,transfer weight,completion, etc.Each batch of standard silver ingots are assigned a unique number,and there are exit account records,including the date of exit, exit weight,etc.All the risks of exit flow are controllable after the company's audit.

1.3.3 记录保存

1.3.3 Preservation of records

在业务开展前，我公司会收集供应商营业执照、资质验证资料、KYC 调查表、环评等资料。每一批次的货物移交单、化验单、结算单、银行转账等相关记录保存 5 个财年以上。

Before business,our company will collect supplier business license, qualification verification information,KYC questionnaire,environmental assessment and other information.Each batch of goods delivery,laboratory inspection, settlement,bank transfer and other related records are kept for more than 5 fiscal years.

1.4 沟通机制

1.4 Communication Mechanism

1.4.1 内外部沟通

1.4.1 Internal and external communication

公司合规小组 2024 年内已加强对对于当期合作客户的联系,并协助合作客户提高尽调能力。合规小组内部每月至少组织一次月度讨论，就当月的供应链相关信息进行内部通报。沟通事项包括日常尽职调查管理工作内容及评审原料采购部门对于当期合作客户尽职调查工作文件，对于尽调工作开展不完善的供应商进行二次尽调，包括派遣合规专员进行供应商辅导培训，根据我公司制定的文件，每年不低于一次培训,提高供应商对其上下游的尽职调查能力,2024 年尽调工作顺利,国内供应商良好配合尽职调查工作。

In 2024,the company's compliance team has strengthened its contact with current cooperative customers and assisted them to improve their due diligence capabilities.Organize at least one monthly discussion within the Compliance team every month to inform the internal information about the current month's supply chain.Communication matters include daily due diligence management work content and review of raw material procurement department's due diligence work documents for current cooperative customers,secondary due diligence for suppliers with imperfect due diligence work,including sending compliance specialists to conduct supplier guidance training,which shall be conducted at least once a year according to the documents formulated by our company.Improve the supplier's due diligence ability on its upstream and downstream,the due diligence work in 2024 is smooth,and the domestic supplier is in good cooperation with the due diligence work.

公司将白银供应链的政策与要求通过电子邮件等方式传达给相关交易方，为了提高供应商的尽职调查能力，公司在 2024 年 12 月 25 日组织各供应商(桂阳县祥成贸易有限公司、河南亿辉金属科科技有限公司、梧州华锡环保科技有限公司、绥中鑫源矿业有限责任公司、上海全银贸易有限公司、深圳市粤鑫贵金属有限公司、上海黄金交易所、江铜国兴（烟台）铜业有限公司)进行了尽职调查的培训。

帮助供应商深入了解白银供应链尽职调查管理制度》和相关工具包，包括 LBMA 对白银的监管要求、可靠白银供应链尽职调查管理政策和白银采购流程风险管理（风险预控、风险评估、监控 和沟通机制等）。合作期间督促业务员定期开展尽职调查了解供应商对于供应链尽职管理体系的执行情况，对于不完善的地方予以辅导，对于执行很好的供应商给予更多的合作机会。

The company will communicate the policies and requirements of the silver supply chain to the relevant trading parties through email and other means.In order to improve the due diligence ability of suppliers,On December25,2024,the company organized various suppliers(Guiyang Xiangcheng Trading Co., LTD.,Henan Yihui Metal Technology Co.,LTD., Wuzhou Huaxi Environmental Protection Technology Co.LTD.,Suizhong Xinyuan Mining Co.LTD.,Shanghai Quanyin TradingCo.LTD.,Shenzhen Yuexin Precious Metals Co.LTD.,Shanghai Gold Exchange,Jiangtong Guoxing (Yantai) Copper Co.LTD.) Due diligence training was conducted. Provide suppliers with an in-depth understanding of the Silver Supply Chain Due Diligence Management System and related toolkits,including the LBMA's regulatory requirements for silver,reliable silver supply chain due diligence management policies,and silver procurement process risk management(risk pre-control,risk assessment,monitoring and communication mechanisms,etc.)During the cooperation period,I urged the salesmen to carry out due diligence regularly to understand the supplier's implementation of the supply chain due diligence management system, provided guidance to the imperfect areas,and gave more cooperation opportunities to the suppliers with good implementation.

公司所有供应商都签署《负责任采购承诺书》，承诺白银来源合法、合规，符合 LBMA 规定。对于公司销售的大客户要备案其下游客户的发票，规避偷逃税款风险。

All of the company's suppliers have signed the Responsible Sourcing Commitment, which commits them to sourcing silver legally and in compliance with LBMA regulations.For the company's sales of large customers to record the invoices of its downstream customers, to avoid the risk of tax evasion.

公司支持实施采掘业透明度行动计划原则的倡议,2024 年度期间暂无从支持 ETTI 国家运营的国有企业处购买开采的银料。

The Company supports the initiative to implement the principles of the Extractive Industries Transparency Action Plan and is temporarily unable to support the purchase of mined silver by state-owned enterprises operating in ETTI countries during the 2024 period.

1.5 建立机密申诉机制

1.5 Establish confidential grievance mechanisms

广东金业贵金属有限公司（以下简称“公司”）根据《LBMA 负责任的白银指南》、《白银供应链尽职调查管理办法》建立了机密申诉机制，公司在官网 http://www.gdldjy.com/《申诉机制》中予以公布电话、电子邮箱，用于接收公司内部及外部相关的询问和申诉。允许员工和外部利益相关者表达对供应链或任何新的已识别风险的担忧，并在整个申诉过程中可以通过匿名使用申诉机制,保护员工隐私，对举报人信息保密，杜绝任何行为的打击报复。要求公司合规专员定期查看工作中接收到的相关方关于负责任供应链的与采矿、贸易、加工和出口情况有关的疑虑方面的信息，通过调查、供应商询问、内部程序检查等方式进行落实，并将处理申诉通过邮箱、邮寄、微信等方式向利益相关者传达解决方案。

Guangdong Jinye Precious Metals Co., LTD.(hereinafter referred to as the "Company") has established a confidential appeal mechanism in accordance with the LBMA Responsible Silver Guide and the Silver Supply Chain Due Diligence Management Measures. The Company will publish the telephone number and email address on its official website http://www.gdldjy.com/. To receive internal and external inquiries and complaints. Allow employees and external stakeholders to voice concerns about supply chain or any new identified risks, and provide anonymous access to appeal mechanisms throughout the appeal process to protect employee privacy,keep whistleblower information confidential,and prevent retaliation for any actions. The compliance specialist of the company is required to regularly review the information received from relevant parties about the concerns related to mining,trade, processing and export of the responsible supply chain,implement the information through investigation, supplier inquiry,internal procedure inspection and other means,and communicate the solution to stakeholders through email,mail,we chat and other means to handle complaints.

1.5.1 申诉处理

1.5.1Complaints Handling

(1)收到申诉后，业务部在五个工作日内对接收到的申诉内容进行调查并作出判定：拒绝申诉或接收申诉。

1) Upon receipt of the complaint,the Business Department shall investigate the contents of the received complaint within five working days and make a decision:reject the complaint or accept the complaint.

(2)经调查属实的申诉，业务部在十五个工作日内确定处理办法，必要情况下与利益相关方进行沟通，确定纠正措施并进行整改。符合申诉条件但不存在该申诉的问题或问题已经解决的，无需采取纠正或改进措施。

(2) If the complaint is verified by investigation, the Business Department shall determine the handling method within 15 working days, communicate with stakeholders if necessary,determine corrective measures and make rectification. It is not necessary to take corrective or improvement measures if the conditions of the complaint are met but the problem of the complaint does not exist or the problem has been solved.

(3)申诉处理完成后五个工作日内将申诉的调查结果，处理办法，纠正措施和结果告知申诉方（通知结果的方式遵循申诉者保护原则）。

(3) Within five working days after the completion of the complaint processing,the complainant shall be informed of the investigation results, handling methods,corrective measures and results of the complaint (the manner of notification of the result shall follow the principle of protection of the complainant).

(4)信息保护：对于公司收到的所有申诉信息，由业务部专门负责人保存相关信息，未经市场部负责人同意，禁止向部门以外的人员透露。

(4) Information protection:For all the complaint information received

by the company,the responsible person of the business department shall keep the relevant information.Without the consent of the responsible person of the Marketing Department,it is forbidden to disclose it to people outside the department.

(5)申诉者保护：公司在处理申诉时将遵循事实、程序、保密和及时原则，保护申诉者的合法权益，对申诉者的信息进行严格的保密，并承诺不会因为申诉行为对申诉者采取任何形式的报复,对于未能遵守保密原则导致申诉者利益受到损害，公司将酌情予以追究或移交司法机关处理。

(5) Protection of complainants:When handling complaints,the Company will follow the principles of facts, procedures,confidentiality and timeliness,protect the legitimate rights and interests of the complainants, keep the complainants' information strictly confidential,and promise not to take any form of retaliation against the complainants because of the complaint behavior.For the failure to comply with the confidentiality principle and the interests of the complainants are damaged,the Company will investigate or transfer the complainants to the judicial authorities as appropriate.

2024 年公司共接收到来自内部员工关于工资福利待遇薪资差异的 1 处申诉,通过详细解释说明车间工作员工按产量分配薪资政策,并及时有官网公示相关按产量分配薪资的计算方法,相关员工得到满意答复,并关闭申诉。

In 2024,the company received a total of one complaint from internal employees about the difference in wages, benefits and benefits.By explaining in detail the salary policy of workshop employees allocated according to output,and timely publishing the calculation method of relevant salary allocation according to output on the official website,the relevant employees got a satisfactory answer and closed the complaint.

1.5.2 解决申诉采取的步骤:

1.5.2 Steps to Resolve a complaint:

```
开始
|
↓
提交申诉 → 材料齐全？ → 是 → 受理并分配编号 → 转交审核部门
|              ↓否
|              通知用户补全材料
↓
审核部门初审 → 申诉成立？ → 是 → 进入调查 → 形成报告 → 管理层决策
|              ↓否
|              驳回并通知
↓
执行处理方案 → 用户反馈 → 满意？ → 是 → 归档
|              ↓否
↓              重新审核
申诉关闭
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合规专员定期总结风险情况处理结果，并在公司官网公示申诉内容、处理方式及处理结果，合规官负责全程监督风险减缓措施的实施并及时向合规总监汇报进度，在风险减缓措施实施完成后，由合规总监定期评估措施的有效性并作出总结和评价。

The compliance specialist regularly summarizes the results of risk treatment,and publicizes the contents, treatment methods and results of the complaint on the official website of the company.The compliance officer is responsible for overseeing the implementation of risk mitigation measures throughout the process and reporting the progress to the compliance Director in time.After the implementation of risk mitigation measures, the compliance Director regularly evaluates the effectiveness of the measures and makes a summary and evaluation.

1.5.3 对申诉采取的纠正和预防措施的性质

1.5.3 Nature of corrective and preventive measures taken in response to complaints

一、纠正措施的性质

The nature of the corrective measures

为解决申诉而采取的步骤，以及在相关和适当的情况下，在申诉过程中,通过向内外部调查、评估、员工(供应商)询问、内部程序检查及内部审核等措施,在此过程中保证保密性。

Steps taken to resolve a complaint and,where relevant and appropriate, to ensure confidentiality during the complaint process by means of internal and external investigations,evaluations,employee(supplier)inquiries, internal procedure checks and internal audits.

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

合规声明:截至2024年12月31日，公司完全遵守第2步：对供应链中的风险进行识别和评估。

Statement of Compliance: As of December 31, 2024,the Company is in full compliance with Step 2:Identifying and assessing risks in the supply chain.

公司严格遵守LBMA负责任白银指南第二步“ 识别及评估供应链风险”，及经合组织尽职调查指南附件二的要求， 并考虑精炼商白银供应链中的不利 ESG 因素.制定《风险评估表》,明确了判定标准，充分对供应链中的地点、供应商、物料、ASM、再生白银的风险进行识别和评估。2024年，未发现零容忍和高风险供应链。

The company strictly complies with Step 2 of the LBMA Responsible Silver Guidelines,"Identifying and assessing Supply Chain Risks," and Annex II of the OECD Due Diligence Guidelines,taking into account adverse ESG factors in the refiner's silver supply chain.The Risk Assessment Form has been developed to clarify the criteria and fully identify and assess the risks of locations,suppliers,materials,ASM,and recycled silver in the supply chain.In 2024,zero tolerance and high risk supply chains were not found.

2.1 开展供应链尽职调查，识别白银供应链风险

2.1 Conduct supply chain due diligence to identify silver supply chain risks

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》附件II并扩展至供应链中不利 ESG 因素，精炼厂识别相关风险，密切关注来自来自不遵守环境和可持续发展法律要求、侵犯人权、武装冲突、非法开采、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，填写 KYC问卷，承诺书，在与其签合同之前完成供应商档案的建立工作，并对其进行风险评级。

In accordance with Annex II of the OECD Due Diligence Guidelines for

Responsible Supply Chains for Ores from Conflict-Affected and High-risk Areas,and extended to adverse ESG factors in the supply chain,refiners identify associated risks and pay close attention to silver from areas such as non-compliance with environmental and sustainable development laws,human rights violations,armed conflict,illegal mining,and origin in World Heritage sites.And silver used for bribery,money laundering,terrorist financing,and more.The company establishes a supplier profile for each supplier,fills out KYC questionnaires,commitment letters,completes the establishment of a supplier profile before signing a contract with it,and grades its risk.

合作前，公司对于所有供应商均进行供应链的尽职管理调查，风险评判细则涵盖了位置风险、公司风险、原料风险三个维度，位置风险可参考中国政府认可的CHINA政府信息公开、联合国安全理事会、美国、英国、欧盟制裁清单，欧盟CAHRAs清单、多德-弗兰克法案第1502条、海德堡晴雨表、脆弱国家指数或类似的指数、联合国人权事务高级专员办事处或同等机构、金融行动特别工作组（FATF）的报告（包括相关国家/地区报告）、关于高风险白银中心/转运中心和高洗钱风险国家/地区的可靠市场情报等资料，填写KYC问卷，在进行合作前要求合作方提供符合供应链尽职调查管理制度要求的相关资质证明文件，对供应商基本情况、股东信息、提供原料类型及产地、贵金属类型、结算方式等信息进行调查，并尽可能地将供应链调查向供应商的上游延伸，对于涉及零容忍供应链、高风险供应链的供应商拒绝合作。

Before the cooperation, the company conducts supply chain due diligence management survey for all suppliers.The risk assessment rules cover three dimensions:location risk,company risk and raw material risk.The location risk can be referred to the CHINA Government information disclosure approved by the Chinese government,the United Nations Security Council, the United States,the United Kingdom and the European Union sanctions list. Eu CAHRAs list,Article 1502 of the Dodd-Frank Act,Heidelberg Barometer, Fragile States Index or similar index,Office of the United Nations High Commissioner for Human Rights or equivalent,Financial Action Task Force (FATF) reports (including relevant country reports),on high-risk silver centres/transit centres and countries at high risk of money laundering / region's reliable market intelligence and other information,fill in KYC questionnaires,require the partner to provide relevant qualification documents that meet the requirements of the supply chain due diligence management system before cooperation,and investigate the basic information of suppliers, shareholders' information,types and places of raw materials provided,types of precious metals,settlement methods and other information. And extend the supply chain investigation to the upstream of suppliers as far as possible,and refuse to cooperate with suppliers involved in zero-tolerance supply chain and high-risk supply chain.

合作过程中，对于供应商商业活动动态进行了解和评估，持续对供应商信息进行追踪调查。充分发挥网络作用，利用企查查、中国审判信息网等网站对供应商资质情况、失信情况、诉讼情况、处罚情况进行查询，搜集ESG相关内容。对于银料采购，原料主要来源地国内的：广西、河南、湖南、上海、辽宁,没有相关进口国的银料.根据2024年度对进口国进行识别风险，查询无中国、美国、英国、欧盟、联合国维和部队行动、安理会制裁，海德堡晴雨表无4级以上冲突，不在金融行动特别工作组（FATF）名单，不涉及多德-弗兰克法案第1502条罗列国。并结合脆弱国家指数、联合国人权事务高级专员办事处或同等机构、关于高风险白银中心/转运中心和高洗钱风险国家/地区的可靠市场情报等资料，对存在疑似高风险地区排除如下：

In the process of cooperation,understand and evaluate the dynamic business activities of suppliers,and continue to track and investigate the information of suppliers.Give full play to the role of the network,use the enterprise Chacha,China Trial Information network and other websites to inquire about the supplier's qualification,breach of trust,litigation, punishment, and collect ESG related content. For silver procurement, the main sources of raw materials are domestic:Guangxi,Henan,Hunan,Shanghai, Liaoning,and there is no silver from related importing countries.According to the risk identification of importing countries in 2024,no China,the United States,the United Kingdom,the European Union,United Nations peacekeeping operations,Security Council sanctions,Heidelberg Barometer no conflict above level 4,not on the Financial Action Task Force (FATF) list,not involved in the Dodd-Frank Act Section 1502 list of countries. Combined with information such as the Fragile States Index,the Office of the United Nations High Commissioner for Human Rights or equivalent, reliable market intelligence on high-risk silver centres/transit centres and countries/regions at high risk of money laundering,the following are excluded from areas with suspected high risk:

通过全方面识别、排查，2024 年未出现高风险客户和高风险地区原料。

Through all aspects of identification and investigation,there are no high-risk customers and raw materials in high-risk areas in 2024.

以上调查和评估均由合规小组成员参加，从各自负责的领域对于供应商进行评估，由合规官进行汇总，报合规总监进行综合评审，评审结果由合规总监上报合规调查小组。

All the above investigations and evaluations are conducted by members of the compliance team. Suppliers are evaluated in their respective fields, summarized by the compliance officer,reported to the compliance director for comprehensive review,and the review results are reported to the compliance investigation team by the compliance director.

年底，合规经理总结 2024 年度供应链尽职调查工作，并对下一年工作制定计划，形成合规报告，由合规总监审核后，报合规委员会进行审批。审批通过后，在公开网站上进行公示。2024 年度期间，公司完成所有供应商尽职调查，未发现零容忍供应链和高风险供应链。2024 年度对供应商的调查和评估结果均为低风险。

At the end of the year,the compliance manager summarized the 2024 supply chain due diligence work,formulated a plan for the next year's work, and formed a compliance report,which was reviewed by the compliance director and submitted to the Compliance Committee for approval.After approval,it will be publicized on the public website.During the year 2024,the company completed all supplier due diligence and found no zero-tolerance and high-risk supply chains.The 2024 supplier survey and evaluation results were all low risk.

2.2 识别零容忍供应链和高风险供应链

2.2 Identify Zero Tolerance Supply Chains and High-Risk Supply Chains

公司根据LBMA负责任白银指南第二步的相关规定，并考虑精炼商白银供应链中的不利ESG因素，制定零容忍供应链和高风险供应链评判标准风险。评判细则涵盖了位置风险、公司风险、原料风险三个维度。

In accordance with the relevant provisions of Step 2 of the LBMA Responsible Silver Guidelines and taking into account adverse ESG factors in the refiner's silver supply chain, the company has developed a zero tolerance supply chain and a high risk supply chain evaluation standard risk. The evaluation rules cover three dimensions: location risk, company risk and raw material risk.

位置风险可参考中国政府认可的国际制裁名单、多德—弗兰克法案第1502条、欧盟CAHRA名单、海德堡晴雨表、脆弱国家指数或类似的指数、联合国人权事务高级专员办事处或同等机构 、金融行动特别工作组（ FATF） 的报告（包括相关国家/地区报告）、关于高风险中心/转运中心和高洗钱风险国家/地区的可靠市场情报。供应链风险可使用工具包中的 KYC 调查问卷对供应链进行风险识别。原料类型风险将原料分类为大规模开采、手工和小规模开采、再生银，再根据各个类型的风险识别要求进行识别。

Location risks can refer to the 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 indices,the Office of the United Nations High Commissioner for Human Rights or equivalent institutions, the reports of the Financial Action Task Force (FATF)(including relevant country/region reports),and reliable market intelligence on high-risk hubs/transshipment centers and countries/regions with a high risk of money laundering. For supply chain risks,the KYC questionnaire in the toolkit can be used to identify the risks in the supply chain. As for raw material type risks, the raw materials are classified into large-scale mining,artisanal and small-scale mining, and recycled silver,and then the risks are identified according to the risk identification requirements of each type.

根据《供应链尽职调查管理制度》中规定的零容忍供应链评判标准进行供应商识别，2024 年度期间我公司采购的原料没有来自被指定为世界遗产或保护区的地区，没有来自违反国际制裁国家（得到中国政府认可），也不存在供应相对方、其他已知的上游公司或它们的最终受益者是已知的洗钱者、诈骗或恐怖分子，不存在曾涉嫌严重侵犯人权，不存在直接或间接支持非法的非国家武装组织，不存在欺骗性地谎报矿物来源。

Identify suppliers in accordance with the zero-tolerance supply chain evaluation criteria specified in the "Supply Chain Due Diligence Management System". During the year 2024, the raw materials purchased by our company did not originate from areas designated as World Heritage Sites or protected areas, nor from countries that violate international sanctions (recognized by the Chinese government). There is also no situation where the supply counterpart, other known upstream companies, or their ultimate beneficiaries are known money launderers, fraudsters or terrorists. There is no case of being suspected of serious human rights violations, no direct or indirect support for illegal non-state armed organizations, and no deceptive misrepresentation of the origin of minerals.

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

In conclusion, during the year 2024, no zero-tolerance supply chains or high-risk supply chains were found, and all procurement activities were carried out in an orderly and compliant manner.

2.2.1 零容忍风险和高风险供应链

2.2.1 Zero-tolerance risk and high-risk supply chains.

根据 LBMA 和 OECD 相关规定，结合公司实际情况，特规定如下零容忍风险和高风险供应链评判标准：

According to relevant LBMA and OECD regulations, and in consideration of the company's actual circumstances, the following criteria for assessing zero tolerance risk and high-risk supply chains are hereby established:

零容忍风险

Zero-tolerance risk

开采银来自被指定为世界遗产地的地区

1.Extraction of silver from regions designated as World Heritage Sites.

2.以违反国际制裁（包括但不吸纳与联合国、欧盟、英国和美国制裁）的方式采购开采银或再生银

2.Procurement of extracted silver or recycled silver in a manner that violates international sanctions (including but not limited to those imposed by the United Nations, European Union, United Kingdom, and United States).

3.开采银再生银的供应对手方、其他已知的上游公司或其 UBO 是已知的洗钱者、欺诈者或恐怖分子，或曾严重侵犯人权，或直接或间接支持非法非国家武装组织。

3.When the counterparty for the extraction of silver or recycled silver, other known upstream companies, or their ultimate beneficial owner (UBO) are known money launderers, fraudsters, or terrorists, have seriously violated human rights, or directly or indirectly support illegal non-state armed groups.

高风险供应链：

High-risk supply chain

（1）矿产银或再生银来源于、中转或者运经受冲突影响和高风险地区；

(1) Mineral silver or recycled silver originates from, transits through, or is transported via conflict-affected and high-risk areas;

（2）矿产银声称来源于一个已知储量有限、资源有限或预计产量有限的国家；

(2) Mineral silver is claimed to originate from a country known for limited reserves, scarce resources, or expected limited production;

（3）再生银来源于已知的冲突影响和高风险地区，或者有理由怀疑经此地区

中转的；

(3) Recycled silver originates from conflict-affected and high-risk areas, or there is reason to suspect that it transits through such areas;

（4）在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) A company within the supply chain or other known upstream companies are located in a country with high risks of money laundering, crime, and corruption;

（5）在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 beneficial owner of a company within the supply chain or other known upstream companies is a politically exposed person;

（6）在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、钻石等），宗教和宗教领袖的；

(6) A company within the supply chain or other known upstream companies actively participates in high-risk business activities (for example, in weapons, gambling, antique and art dealing, diamonds, etc.), including those involving religious affairs or religious leaders;

（7）矿产银来源于国内手续不全、非法开采的小型矿山，以及开采白银源于手工开采；

(7) Mineral silver originates from small-scale mines with incomplete domestic procedures or illegal extraction, as well as silver extracted by artisanal mining;

（8）矿产银或再生银利用汞生产而得；

(8) Mineral silver or recycled silver is produced using mercury;

（9）不遵守环境和可持续发展法律要求，矿产银或再生银源于世界遗产遗址或国内自然生态保护区；

(9) In violation of environmental and sustainable development legal requirements, mineral silver or recycled silver originates from World Heritage Sites or domestic nature reserves;

（10）其他高风险情况。

(10) Other high-risk situations.

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。部门合规专员应立即准备材料上报合规风控专员，由合规风控专员上报合规总监，由合规总监批准采取应对措施，停止交易，消除风险。

If any of the above criteria objectively exist, then the supply chain shall be classified as high-risk. The department’s compliance officer should immediately prepare the relevant materials to report to the risk control compliance officer, who will then report to the compliance director. Upon approval by the compliance director, appropriate countermeasures should be taken, including the cessation of transactions and the elimination of risks.

为降低这些风险而采取的措施，包括与监管机构或伦敦金银市场协会的任何沟通,以及所遵循的强化尽职调查程序。

Measures taken to mitigate these risks, including any communication with regulatory authorities or the London Bullion Market Association,as well as the enhanced due diligence procedures followed.

2.3 关于强化尽职调查的说明

2.3 Note on enhanced due diligence

公司设定有针对高风险的《强化尽职调查程序（第一版）》，若触发 EDD，

必须对白银产地进行实地调查/考察 ，考察过程中运用了 LBMA 所涉及的不同工具包。

The company has established the "Enhanced Due Diligence Procedures (First Edition)" for high risks. If the Enhanced Due Diligence (EDD) is triggered, it is necessary to conduct on-site investigations/inspections of the origin of silver. Different toolkits involved by the London Bullion Market Association (LBMA) are utilized during the inspection process.

公司从严控供应链风险出发，在合规总监的组织下，合规小组将委派业务部经理兼合规经理范锦平先生(市场营销专业,从事经营采购营销管理工作十多年)、财务经理廖意先生(会计专业,从事财务会计工作近二十多年,熟悉产销存过程)、法律顾问（陈柏林）、供应链专家（辛幸君)、风险管理专家（张颖）、数据分析师（李小梅）和现场访问人员（覃超伦）组成的团队,财务专家负责收集和分析供应链的财务数据，包括采购、库存、销售和成本等,以识别潜在的风险和问题。法

律顾问负责提供法律意见和指导，确保调查过程符合法律法规要求，并处理可能涉及的法律问题。供应链专家负责了解白银供应链的运作模式 、供应商选择 、 物流和质量控制等方面 ，评估供应链的风险和脆弱性。风险管理专家负责评估供应链的风险水平，制定相应的风险应对措施，包括风险转移、减轻和监控等。数据分析师负责收集和分析相关数据，运用数据分析工具和方法，对供应链的风险进行定量和定性分析。现场访问人员负责对白银供应链的相关地点进行实地考察，了解实际运作情况，与相关人员交流，收集第一手信息。

Proceeding from the strict control of supply chain risks,under the organization of the Chief Compliance Officer,the compliance team of the company will appoint a team consisting of Mr. Fan Jinping,the Business Department Manager and Compliance Manager(major in Marketing,with more than ten years of experience in operation,procurement,marketing and management),Mr.Liao Yi,the Finance Manager(major in Accounting,with nearly twenty years of experience in financial accounting and familiar with the production,sales and inventory processes),the Legal Counsel(Chen Bailin),the Supply Chain Expert(Xin Xingjun),the Risk Management Expert (Zhang Ying),the Data Analyst(Li Xiaomei)and the On-site Visitor(Qin Chaolun).The financial expert is responsible for collecting and analyzing the financial data of the supply chain,including procurement,inventory,sales and costs,etc.,in order to identify potential risks and problems.The legal counsel is responsible for providing legal advice and guidance to ensure that the investigation process complies with laws and regulations and to handle any possible legal issues.The supply chain expert is responsible for understanding the operation mode of the silver supply chain,supplier selection, logistics, quality control and other aspects, and evaluating the risks and vulnerabilities of the supply chain.The risk management expert is responsible for assessing the risk level of the supply chain and formulating corresponding risk response measures,including risk transfer, mitigation and monitoring.The data analyst is responsible for collecting and analyzing relevant data,using data analysis tools and methods to conduct quantitative and qualitative analysis of the risks of the supply chain. The on-site visitor is responsible for conducting on-site inspections of relevant locations in the silver supply chain, understanding the actual operation situation,communicating with relevant personnel,and collecting first-hand information.

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 ，后续就该供应商展开每年不低于一次的现场调查。

It should be carried out before any transaction occurs,or at least within 6 months after the start of the business relationship. Subsequently, on-site investigations of no less than once a year should be conducted for this supplier.

如因疫情、战争或其他不可抗力因素无法抵达现场的，需及其调查小组联系供应商进行远程调查 ，进行相关资料审核。

If it is impossible to reach the site due to factors such as the epidemic,war or other force majeure,the investigation team is required to contact the supplier for remote investigation and conduct the review of relevant materials.

强化调查程序适用于白银供应链 、白银供应链 、来自中间精炼商的高风险再生银供应链。

The enhanced investigation procedures are applicable to the silver supply chain,the silver supply chain,and the high-risk recycled silver supply chain from intermediate refiners.

2024 年度期间公司供应链未出现高风险供应链，所以未触发强化尽职调查。

During the year 2024,there was no high-risk supply chain in the company's supply chain,so the enhanced due diligence investigation was not triggered.

第三步：设计和实施管理策略，以应对识别的风险

Step 3: Design and implement management strategies to address identified risks

合规性声明：在截至 2024 年 12 月 31 日，公司完全遵守了第 3 步：设计和实施应管理策略，以应对识别的风险。

Compliance Statement:As of December 31, 2024,the company has fully complied with Step 3: Design and implement risk management strategies to address the identified risks.

公司严格遵守《LBMA负责任的白银指南》第三步“设计和实施策略，以应对识别的风险”的要求。2024年未发现零容忍、高风险供应链，因此未采取供应链风险减缓措施。

The company has strictly adhered to the requirements of Step 3 of the "LBMA Responsible Silver Guidance", which is "Design and implement strategies to address the identified risks". In 2024, no zero-tolerance or high-risk supply chains were detected, so no supply chain risk mitigation measures were taken.

当发现供应商属于零容忍供应链或高风险供应链，公司会立即停止或暂停与合作方的合作关系。

When it is found that a supplier belongs to a zero-tolerance supply chain or a high-risk supply chain,the company will immediately terminate or suspend the cooperation relationship with the counterpart.

3.1 就识别的风险分类设计风险管理策略

3.1 Design risk management strategies for identified risks

公司根据风险评估确定了风险管理策略，终止关系、暂停关系、维持关系，但须执行改进计划。

The company has determined risk management strategies based on risk assessment,including terminating the relationship,suspending the relationship,and maintaining the relationship but implementing an improvement plan.

3.1.1 确认终止关系，规避风险

3.1.1 Confirmation of Termination of the Relationship and Risk Avoidance

如果增强型尽职调查或通过实地调查和其他信息综合评估发现供应商存在参与洗钱、恐怖活动融资、严重侵犯人权 、直接或间接支持非法的非国家武装组织以及对矿物来源进行欺骗性虚假陈述的线索 ，公司应立即与供应商终止合作。对于终止合作的供应商， 公司应根据国内外适用的法律要求， 向有关部门和LBMA （如适用）报告此类情况。

If enhanced due diligence,or a comprehensive assessment through on-site investigations and other information,reveals clues that the supplier is involved in money laundering,terrorist financing, gross violations of human rights,directly or indirectly supporting illegal non-state armed groups,and making deceptive and false statements regarding the origin of minerals,the company shall immediately terminate its cooperation with the supplier.For suppliers with whom the cooperation has been terminated, the company shall,in accordance with applicable domestic and international legal requirements,report such situations to the relevant authorities and the LBMA (if applicable).

3.1.2 确认暂停关系 ，在暂停交易的同时降低风险

3.1.2 Confirmation of Suspension of the Relationship and Risk Reduction While Transactions are Suspended

如果增强型尽职调查有理由怀疑供应商存在参与洗钱、恐怖活动融资、严重侵犯人权、直接或间接支持非法的非国家武装组织、对矿物来源进行欺骗性虚假陈述以及灾难性的 ESG 影响情况,公司应暂缓从供应商处采购银料,直到获取更多的信息和证据。供应商提供了反驳初步怀疑的补充信息/数据，或对解决环境、社会和管理问题的影响作出了及时和适当的反应，经过合规风控官批准后冶炼工作就可以恢复进行。

If enhanced due diligence gives rise to reasonable suspicion that the supplier is involved in money laundering,terrorist financing,gross violations of human rights,directly or indirectly supporting illegal non-state armed groups,making deceptive and false statements regarding the origin of minerals,or causing catastrophic ESG impacts,the company shall put on hold the procurement of silver materials from the supplier until more information and evidence are obtained.If the supplier provides supplementary information/data to refute the initial suspicion,or makes a timely and appropriate response to address the impacts of environmental, social and governance issues,the smelting work can be resumed upon the approval of the compliance and risk control officer.

3.1.3 确认保持与改进计划的关系 ，在继续交易的同时降低风险

3.1.3 Confirmation of the Relationship with the Improvement Plan and Risk Reduction While Transactions Continue

如果增强型尽职调查未发现潜在问题或存在少量问题，包括贿赂、对矿物来源的非欺骗性错误陈述、不遵守政府规定的税收、费用和特许使用费政策、严重违反环境、卫生、安全、劳工和与社区有关的地方立法，以及/或极有可能造成高度不利影响的环境、社会和管理问题风险，供应商能提供包含明确改进计划和时间表的风险解决方案，并经公司合规小组评审、合规风控官批准后，公司可以与该供应商开展正常合作关系。风险解决方案应包含明确绩效目标、基于定量和定性分析的绩效评估指标和合理地完成日期。

If enhanced due diligence reveals no potential issues or only a small number of issues,including bribery, non-deceptive misstatements regarding the origin of minerals, non-compliance with government regulations on tax, fees and royalty policies,serious violations of local legislation on the environment,health,safety,labor and community-related matters, and/or risks of environmental,social and governance issues that are highly likely to cause significant adverse impacts,and the supplier can provide a risk solution that includes a clear improvement plan and timeline,and this solution has been reviewed by the company's compliance team and approved by the compliance and risk control officer,the company may maintain a normal cooperative relationship with this supplier.The risk solution should include clear performance objectives,performance evaluation indicators based on quantitative and qualitative analysis,and a reasonable completion date.

3.2 风险管理策略

3.2 Risk management strategy

3.2.1 监控改进计划

3.2.1 Monitor the improvement plan

3.2.1 基于诚信的原则，当公司与供应商继续交易，执行改进计划时，对交易相对方采取可衡量步骤、业绩监测、定期重新评估风险并向合规总监报告等措施。

3.2.1 Based on the principle of good faith, when the company continues transactions with suppliers and implements the improvement plan,it shall adopt measures such as taking measurable steps against the counterparty in the transaction,monitoring performance,regularly reassessing risks, and reporting to the compliance director.

风险监测至少应在开始实施改进计划的六个月内，确定消除风险的重大和可衡量的改进措施。根据六个月取得的进展，在修订后的改进计划中规定附加措施。正式评估绩效，以确定在截止日期前措施已得以适当实施（如通过独立审计、后续现场访问或远程审查）。

Risk monitoring should,at a minimum,identify significant and measurable improvement measures for eliminating risks within six months from the start of implementing the improvement plan.Based on the progress made in six months,additional measures should be specified in the revised improvement plan.Formally evaluate the performance to determine that the measures have been properly implemented by the deadline(such as through independent audits,follow-up on-site visits or remote reviews).

为促进监测活动，酌情咨询利益相关者，如：地方政府机构、上游公司、国际或民间社会组织，以及受影响的第三方，充分发挥网络作用。

To facilitate monitoring activities, consult with stakeholders as appropriate, such as local government agencies, upstream companies, international or civil society organizations, and affected third parties, and give full play to the role of the network.

在改进关系确立的 6 个月之后，如果可衡量的改进有限或没有可衡量的改进予以证明时，须暂停合作关系，直到供应商就改进计划作出响应。如果降低风险和改善表现的尝试失败，则须终止关系。

After six months from the establishment of the improved relationship, if there is limited or no measurable improvement demonstrated,the cooperative relationship must be suspended until the supplier responds to the improvement plan. If attempts to reduce risks and improve performance fail, the relationship must be terminated.

根据2024年的尽职调查结果,并未出现供应商需要进行风险缓解的管理策略。所有供应商合作关系都是持续而良好的合作关系，并未出现终止、暂停交易的情况。

According to the results of the due diligence in 2024,there is no management strategy for risk mitigation required for suppliers.All supplier cooperative relationships are continuous and good cooperative relationships, and there are no situations of termination or suspension of transactions.

3.2.2 定期重新评估与持续监控， 以确保有效的风险管理

3.2.2 Regular Reassessment and Continuous Monitoring to Ensure Effective Risk Management

业务部门负责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，确保有效的风险管理。

The business department is responsible for collecting all changes in supplier information,continuously monitoring transaction results,and conducting an annual reassessment of the supply chain due diligence to decide whether to continue the cooperation,so as to ensure effective risk management.

采购的每一批次原料在运输、出入库、生产、付款过程都有合规专员的监控，其中入库执行原料入库流程，有合规专员审核，出库执行出库程序,有合规专员确认，付款执行付款业务审批程序，报合规总监审批。

Each batch of purchased raw materials is monitored by compliance officers during the processes of transportation, warehousing,production, and payment.When the raw materials are put into storage,the raw material warehousing process is implemented and reviewed by compliance officers. When the raw materials are taken out of storage,the ex-warehouse procedure is carried out and confirmed by compliance officers.When making payments, the payment business approval procedure is implemented and submitted to the compliance director for approval.

3.3 定期报告

3.3 Periodic reports

每季度合规风控官根据白银供应链尽职管理的实际情况,向董事会指定的委员会提交报告。报告本季度白银供应链尽职管理体系运行情况进行总结,提出不足及改进措施。

Quarterly, the compliance and risk control officer shall submit a report to the committee designated by the board of directors based on the actual situation of the due diligence management of the silver supply chain. The report shall summarize the operation of the due diligence management system of the silver supply chain in the current quarter,and put forward deficiencies and improvement measures.

公司建立风险评估报告制度，每月合规官对部门尽职调查工作上报合规总监。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总监审批后报政府有关部门。

The company has established a risk assessment reporting system.The compliance officer shall report the due diligence work of the department to the compliance director every month.When the supply chain investigation reveals that the source is from a high-risk area and the supply chain is evaluated as a high-risk one,the transaction shall be stopped.After reporting to the compliance director for approval,the situation shall be reported to the relevant government departments.

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

合规性声明：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。

Compliance Statement:The company has fully complied with Step 4: Conduct an independent third-party audit of the due diligence of the silver supply chain.

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。基于对必维公司选择合作，主要以三个方面考虑，独立性、公正性、专业性继续聘请必维认证（北京）有限公司开展审计工作。该公司按照国际标准在鉴证业务中执行了合理鉴证业务，上一年度的第三方单独审计中均无中高风险不符合项提出。

The company strictly complies with the requirements of Step 4 of the LBMA Responsible Silver Guidance,which is to"Conduct an independent third-party audit of the due diligence practices of refiners".Based on considerations in three aspects,namely independence,impartiality,and professionalism,the company has chosen to continue to engage Bureau Veritas Certification (Beijing)Co.,Ltd. for the audit work. This company has carried out reasonable assurance services in accordance with international standards in attestation business,and no medium or high-risk non-conformities were raised in the third-party independent audit of the previous year.

本年度评估中，开具了 1 个中风险不符合项和 1 个低风险不符合项，公司将加强体系人员的培训，确保供应链尽职调查政策得到及时更新。加强尽职调查人员培训，确保供应链尽职调查的完整性。公司在 2025 年 3 月 26 日交了 2 个不符合项的整改措施，并得到审核员的验证，不符合项已经关闭。

In this year's assessment,one medium-risk non-conformity and one low-risk non-conformity were identified. The company will strengthen the training of personnel within the system to ensure that the supply chain due diligence policy is updated in a timely manner. Additionally,it will enhance the training of due diligence personnel to ensure the integrity of supply chain due diligence. The company submitted corrective measures for the two non-conformities on March 26,2025,and these measures were verified by the auditor. The non-conformities have now been closed.

2023 年有限保证报告已经披露在公司官网上，网址为 http://www.gdldjy.com/upLoad/news/ReportLBMAISAE3000.pdf

The limited assurance report for 2023 has been disclosed on the company's official website. The website address is

http://www.gdldjy.com/upLoad/news/ReportLBMAISAE3000.pdf

第五步：每年发布供应链尽职调查报告

Step 5: Supply chain due diligence report issued annually

合规性声明：公司完全遵守了第 5 步：供应链尽职调查年度报告。

Compliance Statement: The company has fully complied with Step 5: Annual Report on Supply Chain Due Diligence.

根据 LBMA 负责任的白银指南和披露指南的要求，公司按时编制了合规报告。我们在公司官方网站上披露了供应链尽职调查政策和合规报告（http://www.gdldjy.com/news/?7_71.html），以便其他利益相关者可下载获取。

In accordance with the requirements of the LBMA Responsible Silver Guidance and the Disclosure Guidance,the company has prepared the compliance report on time. We have disclosed the supply chain due diligence policy and the compliance report on the company's official website (http://www.gdldjy.com/news/?7_71.html)so that other stakeholders can download and access them.

四、管理结论

IV. Management Conclusion

广东金业贵金属有限公司根据《LBMA负责任的白银指南》建立并完善了供应链尽职管理体系，识别和评估了供应链相关风险，设计并实施了风险管理策略，对供应链尽职调查工作进行了独立的第三方审计，同时将上一年度保证报告、尽职调查政策、合规报告、申诉渠道等资料在公司官网上公布。因此，在报告年度截至于2024年12月31日的财年内，公司完全遵守《LBMA负责任的白银指南》。

Guangdong Jinye Precious Metals Co.,Ltd.has established and improved the supply chain due diligence management system in accordance with the LBMA Responsible Silver Guidance.It has identified and evaluated supply chain - related risks, designed and implemented risk management strategies, and conducted an independent third - party audit of the supply chain due diligence work.At the same time,it has published materials such as the previous year's assurance report,due diligence policy,compliance report, and complaint channels on the company's official website.Therefore,during the fiscal year ending December 31, 2024,the company fully complied with the LBMA Responsible Silver Guidance.

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，更有效地将负责任采购理念及负责任尽职调查流程融入公司内部管理制度、程序、流程和实践。定期在内部对任何已确定的纠正措施进行监控。

In the next stage of work, the company is committed to continuous improvement based on the existing silver supply chain due diligence system, and will more effectively integrate the concept of responsible procurement and the responsible due diligence process into the company's internal management systems,procedures,processes,and practices.It will regularly monitor any identified corrective measures within the company.

五、其他

V 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 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 department of the Company by telephone 0766-3829080 or E-mail gdjinye@sina.com.