

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
(2025)

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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。公司设立有购销部、财务部、技术部、生产部、行政部等部门，以保证公司正常生产经营，设置有副总经理、经理、主任等管理层，也设立了公司董事会。

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. The company has established departments such as the Purchasing and Sales Department, the Finance Department, the Technology Department, the Production Department, and the Administration Department to ensure the normal operation of the company. It also has management positions such as deputy general managers, managers, and directors, and has set up the company's board of directors.

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2025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

s compliance with the LBMA Responsible Silver Guidance as of December 31, 2025.

公司主要原料来源为国内矿山物料和回收银中提炼白银，2025 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 2025, 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 2025 年 12 月 31 日止，公司已经完全遵守第 1 步的要求：已建立了负责任的公司采购管理政策体系，确保白银供应链尽职调查工作全面落地。

Compliance Statement: As of December 31, 2025, The company had fully complied with the requirements of Step 1: it has established a responsible corporate procurement management policy system to ensure that the due diligence work for the silver supply chain is fully implemented.

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.

2025 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 in 2025, 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 control 2. 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 负责任白银供应链调查管理政策》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/news/?7_71.html) 上予以公布, 确保了公司白银尽责体系的有效运行, 并已传达给所有相关员工该政策。公司对政策每年进行审查一次, 并在情况需要时进行更新, 并通过邮件传达给供应商的。

The fourth edition of the Company's 2025 revised "Silver Silver Supply Chain Due Diligence Policy" was approved by Compliance Director Li Tianshun on January 15, 2025. And be published on the company's official website (http://www.gdldjy.com/news/?7_71.html), ensure the effective operation of the company silver responsible system, and this policy has been communicated to all relevant employees. The company reviews the policy once a year and updates it when necessary. It is also communicated to suppliers via email.

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《LBMA 负责任白银供应链调查管理政策》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 based on the "LBMA Responsible Silver Supply Chain Investigation Management Policy" and the Annex II of the OECD Due Diligence Guidance. This system provides effective supervision for the implementation and continuous improvement of the supply chain due diligence plan. It clearly defines the management positions and corresponding responsibilities. The board of directors has established a due diligence team, a compliance director, a compliance officer, and a 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（合规总监）、业务部经理（合规官），行政部经理（合规专员），小组成员由购销部、财务部、技术部、生产部、行政部等指派。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 established a compliance investigation committee team specifically for the due diligence of the silver supply chain. The team includes the deputy general manager (compliance director), the business department manager (compliance officer), and the administrative department manager (compliance specialist). The team members are appointed by the purchasing and sales department, the finance department, the technology department, the production department, and the administrative department. The compliance investigation team is responsible for approving the policies and systems of the supply chain due diligence, as well as the compliance reports. They are also responsible for providing sufficient resource support through the establishment of the compliance investigation team, various information collection channels (such as the National Enterprise Credit Information Publicity System, the Court Document Network), technical tools and platforms, professional financial analysis capabilities, reference to credit rating agency reports, and expert data from industry associations, to carry out 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担任,自我公司建厂他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他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。合规专员拥有丰富的尽调实践经验,能应对各个时期的尽调工作,保证尽调工作详细落实。合规总监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，并定期将尽职调查的相关事宜汇报给董事会。合规经理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 held by the deputy general manager of senior managers. Since the establishment of our company, he has always been an important senior manager of our company and is responsible for the production management of the company. He has over 10 years of rich theoretical knowledge and practical experience in production management and provides training for everyone to effectively supervise the implementation of responsible purchasing activities. The business manager and compliance manager graduated from Southwest University of Finance and Economics with a major in marketing and has over ten years of experience in operating, purchasing and marketing management. The compliance specialist has rich experience in due diligence and can handle due diligence work in all periods, ensuring the detailed implementation of due diligence work. The compliance director 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 situations, supervising and inspecting the implementation of each department and conducting evaluations, reporting abnormal situations in supply chain due diligence, coordinating and handling abnormal situations in supply chain due diligence, approving compliance reports and organizing training, and regularly reporting relevant matters of due diligence to the board of directors. The compliance manager is responsible for organizing the measurement, testing and analysis of silver-containing raw materials and the analysis of silver products for procurement of raw materials in accordance with the company's raw material

procurement policy; and drafting, updating and approving the silver supply chain system.

合规小组成员由购销部、财务部、技术部、生产部、行政部等指派，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。

The members of the compliance team are appointed by the purchasing and sales department, finance department, technology department, production department, and administrative department, respectively. According to their respective responsibilities, they strictly implement the supply chain due diligence measures and zero-tolerance, high-risk supply chain evaluation standards, collect and preserve sufficient supply chain supporting documents, establish supplier due diligence files, and conduct on-site investigations of important suppliers on a regular basis.

设置于购销部的合规小组成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 team members stationed in the purchasing and sales department are responsible for conducting evaluations of suppliers before contract signing, supervising transactions with qualified suppliers, and conducting re-evaluations on an annual basis. They also implement and enforce the LBMA's silver due diligence concept during business negotiations and raw material procurement processes.

设置于行政部的合规小组成员负责培训，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：仓管管理、销售、财务、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。2025 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，2025 年度共计进行了两次培训。

The compliance team members stationed in the administrative department are responsible for training and assisting the compliance risk control officer in formulating various systems for the company's responsible management. The company includes supply chain due diligence management training, ESG-related content and guidelines disclosure, qualified delivery list rules, etc. in its annual training plan. It organizes training for key positions in the company (such as warehouse management, sales, finance, central laboratory, main production members), with a training rate of 100% and a participation rate of 100%. The compliance officers also provide training on the requirements of supply chain due diligence management, mainly based on the LBMA Responsible Silver Guidelines, to ensure that the supply chain due diligence management work is implemented effectively. In 2025, our company regularly organized training for 100% of the employees in the silver-related departments, and a total of two training sessions were conducted in 2025.

1. 2025 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

1. On December 16, 2025, 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.

2. 2026 年 01 月 07 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

2. On Jan 07, 2026, LBMA Responsible Silver Guideline version upgrade training and LBMA responsible silver supply chain due diligence training were conducted.

培训内容包括如 LBMA 负责的白银第 2 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.

设置于财务的合规小组成员，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，2025 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。

The compliance team members in the finance department are responsible for the contract approval of supplier sales and processing services. They control the contracts and funds from a financial perspective. They supervise the related business and fund activities. In 2025, both payments and receipts were made through the online banking of the bank where the

company's basic account is located, and bank statements were printed as attachment documents for retention. No cash receipts or payments were made.

设置于仓管合规小组成员，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。

Members of the warehouse compliance team are responsible for collecting and preserving sufficient documents related to the silver supply chain, verifying and recording the information of each batch of received products, the process of material circulation and the weight records, keeping the test reports, supervising the marking and storage of materials; the transfer forms, test reports, settlement forms, bank transfer records and other related documents for each batch of goods should be kept for more than 5 fiscal years.

2025 年，公司提供了人力、财力等必备的资源 and 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《白银供应链尽职调查管理政策》，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 2025, the company provided the necessary resources and skills, including human and financial resources, to support and monitor the due diligence process. The relevant members of the team strictly implemented the "Silver Supply Chain Due Diligence Management Policy", carried out supply chain due diligence in accordance with the requirements, investigated the qualifications of all suppliers, monitored all transactions, and did not establish relationships with zero-tolerance supply chains or high-risk supply chains. At the same time, all raw material

procurement business signed contracts and supplier commitment letters (as attachments to the contracts), and the contracts were signed in strict accordance with the approval process stipulated by the company. All suppliers committed that the source of raw materials met the requirements of the Silver Guidelines. This year, the company did not have any assessment penalties due to ineffective investigation work or false reporting of materials.

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

公司根据贵金属来源的 RGG（资源地质指南），对银料所有供应商的识别直至贵金属原产地，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识别供应链各交易对手（包括采矿、出口、运输、精炼、回收等环节），最终定位贵金属的矿山 / 再生源头，排除冲突、高风险与人权侵害关联。适用原料类型：原生矿（LSM/ASM）、再生金（未加工/熔融回收料、工业副产品）、混合物料，不同类型对应差异化溯源路径。

Based on the RGG (Resource Geology Guide) of the source of precious metals, the company conducted credit investigations on all suppliers of silver materials, down to the origin of the precious metals. Through due diligence questionnaires, we collect and review the qualifications of suppliers, business operations, shareholder information, and material sources, etc., to conduct credit investigations and identify each counterparty in the supply chain (including mining, export, transportation, refining, recycling, and other links), and ultimately locate the source of precious metal mines/regeneration, excluding conflicts, high risks, and human rights violations. Applicable raw material types: primary ore (LSM/ASM), recycled gold (unprocessed/molten recycled materials, industrial by-products), mixed materials. Different types correspond to differentiated traceability paths.

方法: 交易对手全量映射与 KYC 穿透

1) 建立供应链图谱, 逐级登记所有交易对手(采矿商、出口商、中间商、运输商、精炼商等)的法定名称、地址、实益所有人(10%以上股权)、业务资质与合规记录。

2) 实施"了解你的客户"(KYC)与"了解你的供应商"(KYS), 核查最终实益所有人是否在联合国/欧盟/英美等制裁名单、FATF 灰名单或恐怖融资名单内。

3) 对高风险对手方(如 CAHRA 地区、ASM、非正规回收渠道)开展额外背景调查, 必要时通过第三方机构核验。

Method: Counterparty full mapping and KYC penetration Establish a supply chain map and register the legal names, addresses, beneficial owners (with more than 10% equity), business qualifications and compliance records of all counterparties (miners, exporters, middlemen, transporters, refiners, etc.) level by level.

Implement "Know Your Customer "(KYC) and " Know Your Supplier "(KYS), and verify whether the ultimate beneficial owner is on the sanctions lists of the United Nations, the European Union, the United Kingdom, the United States, etc., the FATF gray list or the terrorist financing list.

Conduct additional background checks on high-risk counterparties (such as CAHRA regions, ASM, and informal recycling channels), and verify them through third-party institutions if necessary.

公司已建立了一套供应链可追溯体系, 包括监管链映射和供应链参与者的识别。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 had established a supply chain traceability system, including chain of custody mapping and identification of supply chain participants. According to the "LBMA Responsible Silver Guide", various sources of precious metals are identified. Each batch of raw materials transferred to our company is recorded in a ledger, including the supplier

name,origin,material type,transfer date,transfer weight,fineness,etc. Each batch of standard silver ingots leaving the warehouse is assigned a unique number and is recorded in an outbound ledger,including the outbound date,outbound 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.

2025 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 2025 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《LBMA 负责任的白银指南》要求。

Before the contract is signed, the company's purchasing department is responsible for communicating with the suppliers in accordance with the "Silver Supply Chain Due Diligence Management Measures". Through this communication, they enable the suppliers to promptly understand the responsible silver supply policy of LBMA and the company's silver supply chain due diligence policies, and caution the suppliers to follow the relevant policies and procedures. Through thorough communication, a risk assessment is conducted on the suppliers to avoid cooperation with high-risk suppliers. The investigation is carried out in accordance with the supply chain due diligence management system, the KYC questionnaire is filled out, and a preliminary investigation of the supply chain is conducted to determine the risk level of its origin. After the investigation is completed, the contract is signed, and the "Supplier Commitment Letter" is attached as an annex to the contract and signed and stamped together to ensure that the suppliers commit to the legality and compliance of the raw materials and that they meet the requirements of the "LBMA Responsible Silver Guidelines".

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。在 2025 年年度内，公司主要的白银主要来自中国市场的回收白银和来自中国广西，中国辽宁共计 2 座矿山的矿产银。

The company has established a supply chain traceability system. For each batch of raw materials transferred to our company, there are detailed records, including the name of the supplier, the transfer date, the transfer weight, and the fineness, etc. Each batch of standard silver ingots leaving the warehouse is assigned a unique number, and there is a warehouse transfer record, including the transfer date and the transfer weight, etc. All the outflow directions that have been reviewed by the company are risk-controlled. Within the 2025 fiscal year, the company's main silver sources come from recycled silver in the Chinese market and from the silver mines in Guangxi and Liaoning of China, totaling 2 mines.

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 2025 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，2025 年尽调工作顺利，国内供应商良好配合尽职调查工作。

In 2025, 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 2025 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 2025 年 12 月 25 日组织所有供应商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，并传达了公司对供应商的尽职调查期望（配合公司进行尽职调查并针对每笔交易提供监管链信息）。

The company conveyed the policies and requirements of the silver supply

chain to the relevant trading parties through email and other means. To enhance the due diligence capabilities of suppliers, the company organized a training session on due diligence for all suppliers on December 25, 2025. The aim was to help suppliers gain a deep understanding of the due diligence management system for the silver supply chain and related toolkits, including the LBMA's regulatory requirements for silver, reliable due diligence management policies for the silver supply chain, and risk management in the silver procurement process (including risk anticipation, risk assessment, monitoring, and communication mechanisms, etc.). During the cooperation period, the sales representatives were urged to conduct due diligence regularly to understand the implementation status of the supplier's supply chain due diligence management system. For areas that were not yet perfect, they were provided with guidance. For suppliers with excellent performance, they were given more cooperation opportunities, and the company conveyed its expectations for the suppliers' due diligence (cooperating with the company in due diligence and providing regulatory chain information for each transaction).

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,2025 年度期间暂无从支持 EITI 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 2025 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、电话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 Guidelines" and the "Silver Supply Chain Due Diligence Management Measures". The Company has published the phone number and email address in the "Appeal Mechanism" section of its official website <http://www.gdldjy.com/>, which are used to receive inquiries and appeals from both internal and external parties. It allows employees and external stakeholders to express concerns about the supply chain or any newly identified risks, and during the entire appeal process, employees can use the appeal mechanism anonymously to protect their privacy. The information of the whistleblower will be kept confidential and no retaliation will be tolerated. The compliance officer of the Company is required to regularly review the information received from relevant parties regarding concerns about the responsible supply chain, mining, trade, processing and export situations during the work. This will be implemented through investigation, supplier inquiries, internal procedure checks, etc.,

and the solutions to the appeals will be conveyed to the stakeholders through email, phone, etc.

1.5.1 申诉处理

1.5.1 Complaints 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。

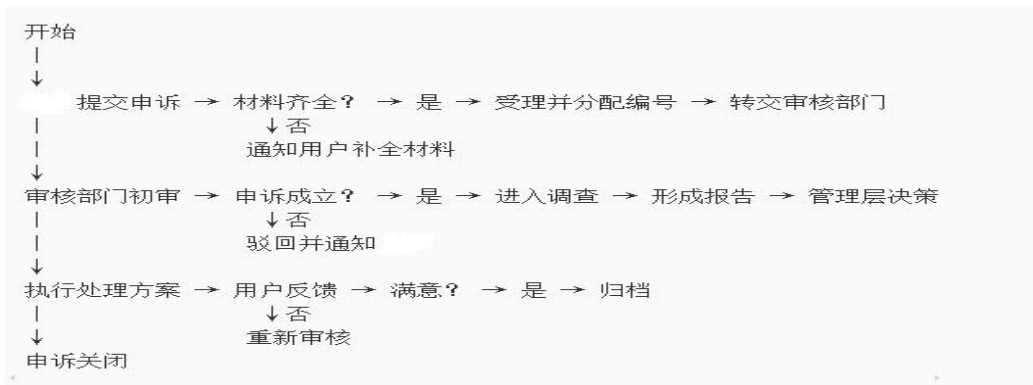
(5) Protection of complainants:When handling complaints,the Company will follow the principles of facts, procedures,confidentiality and timeliness,protect the legitimate rights and interests of the complainants, keep the complainants' information strictly confidential,and promise not to take any form 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.

2025 年公司没有接收到来自内外部任何关于公司白银供应链中有 LBMA 白银指南中列出的风险的任何申诉。

In 2025, the company did not receive any complaints from either internal or external sources regarding any risks listed in the LBMA Silver Guidelines in the company's silver supply chain.

1.5.2 解决申诉采取的步骤：

1.5.2 Steps to Resolve a complaint:



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 2025 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, 2025, 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、LSM、再生白银的风险进行识别和评估。2025 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, LSM, and recycled silver in the supply chain. In 2025, 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、深圳，没有相关进口国的银料。根据 2025 年度对进口国进行识别风险，查询无美国、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 2025, no 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，2025 年所有物料均来自中国，中国未被识别为高风险地区，因此未出现高风险客户和高风险地区原料。

Through comprehensive identification and investigation, by 2025 all materials will come from China. China has not been identified as a high-risk area, so there will be no high-risk customers or high-risk region raw materials.

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 2025 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。2025 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。2025 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 2025 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 2025, the company completed all supplier due diligence and found no zero-tolerance and high-risk supply chains. The 2025 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, 2025 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人是已知的洗钱者、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 2025, 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, 2025 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 2025, 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

2.3.1 2025 年度期间公司供应链均来自国内矿山物料和回收银中提炼白银，未出现高风险供应链，所以未触发强化尽职调查。

During the 2025 fiscal year, the company's supply chain was entirely sourced from domestic mine materials and silver recycled from which silver was extracted. There were no high-risk supply chains, so no enhanced due diligence was triggered.

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，考察过程中会针对不同类型含贵金属材料所采用的 EDD 程序和工具。

The company has established a "Strengthened Due Diligence Procedure (First Edition)" for high-risk situations. If the EDD is triggered, a on-site investigation of the silver production area must be conducted. During the investigation, the EDD procedures and tools used for different types of precious metal-containing materials will be examined..

2.3.2 公司从严控供应链风险出发，在合规总监的组织下，合规小组将合规小组就有具体营业场地的供应商进行实地考察，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。

2.3.2 Starting from the strict control of supply chain risks, under the

organization of the compliance director, the compliance team will conduct on-site inspections of suppliers with specific business premises. The inspection contents include: business type, material type, source location description, transportation method, number of upstream suppliers, transaction payment method, etc. The on-site inspection of individual suppliers will be conducted at least once a year.

2.3.3 如果发现含银物料可能来自高风险地区,启动公司强化尽职调查程序,按照公司《白银供应链风险减缓管理办法》,开展实地评估工作。LBMA 实地评估问卷,适用于我司白银原料采购工作。将委派业务部经理兼合规经理(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(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、供应链专家、风险管理专家、数据分析师和现场访问人员组成的团队,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。加强尽职调查(Enhanced Due Diligence, EDD)以 OECD 五步尽职调查框架为核心,通过标准化工具包(包括但不限于 LBMA 提供的实地评估报告模板)、第三方鉴证、事件审查与特别审计等组合工具实施,频率以每年一次为基准,高风险场景触发实时/定期强化,确保白银供应链合规。

If it is found that the silver-containing materials may come from high-risk areas, the company's enhanced due diligence procedures will be initiated. According to the company's "Silver Supply Chain Risk Mitigation Management Measures", on-site assessment work will be carried out. The LBMA on-site assessment questionnaire is applicable to our company's silver raw material procurement work. A team consisting of the business department manager and compliance manager (with a marketing background, having been

engaged in operation, procurement, and marketing management for over ten years), the financial manager (with an accounting background, having been engaged in financial accounting work for nearly twenty years, familiar with the production, sales, and inventory processes), the legal advisor, supply chain expert, risk management expert, data analyst, and on-site visitors will be appointed. The financial expert is responsible for collecting and analyzing the financial data of the supply chain, including procurement, inventory, sales, and costs, to identify potential risks and problems. The legal advisor is responsible for providing legal opinions and guidance to ensure that the investigation process complies with legal requirements and handles any legal issues that may arise. The supply chain expert is responsible for understanding the operation mode of the silver supply chain, supplier selection, logistics, and quality control, and assessing the risks and vulnerabilities of the supply chain. The risk management expert is responsible for assessing the risk level of the supply chain, formulating corresponding risk response measures, including risk transfer, mitigation, and monitoring, etc. 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 visitors are responsible for conducting on-site inspections of the relevant locations of the silver supply chain, understanding the actual operation, communicating with relevant personnel, and collecting first-hand information. Strengthened due diligence (Enhanced Due Diligence, EDD) is based on the OECD five-step due diligence framework, implemented through standardized toolkits (including but not limited to the on-site assessment report templates provided by LBMA), third-party verification, event review, and special audits, with a frequency of once a year as the benchmark. High-risk scenarios trigger real-time or regular enhanced measures to ensure the compliance of the silver supply chain.

2.3.4 白银供应链强化尽职调查流程：

The Silver supply chain enhanced due diligence process:

步骤一：尽职调查过程中识别供应链内潜在风险后上报合规官。

Step 1: Identify potential risks in the supply chain during due diligence and report to the Compliance Officer.

步骤二：合规官收集并整理好相关信息材料上报合规总监备案。

Step 2: The Compliance Officer shall collect and sort out the relevant information and materials and report them to the Compliance Director for record.

步骤三：开展强化尽职调查工作，运用 LBMA 实地考察表，委派相关人员开展工作并形成报告。

Step 3: Carry out the intensive due diligence work, use the LBMA onsite investigation form, assign relevant personnel to carry out the work and form a report.

步骤四：合规总监召开评审会议，判定风险类型，并按照公司《白银供应链风险减缓管理办法》采取措施减缓风险，决定是否继续交易、解除或暂停前述供应链，并对这一决策制定过程进行记录。

Step 4: The Compliance Director shall hold a review meeting to determine the risk type, take measures to mitigate the risk according to the Company's Silver Supply Chain Risk Reduction Management Measures, decide whether to continue trading, terminate or suspend the aforementioned supply chain, and record the decision-making process.

步骤五：公司办公室上报当地政府部门。

Step 5: The company office report to the local government department.

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。如供应商不配合加强型尽职调查工作，将上报给合规委员会决定是否停止/中断/终止与该供应商的合作。

If it is impossible to arrive at the site due to factors such as the epidemic, war or other force majeure events, the investigation team needs to contact the supplier for a remote investigation and review the relevant materials. If the supplier does not cooperate with the enhanced due diligence process, it will be reported to the compliance committee to decide whether to stop/abruptly terminate/terminate the cooperation with this supplier.

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.

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 2025 年 12 月 31 日，公司完全遵守了第 3 步：设计和实施管理策略，以应对识别的风险。

Compliance Statement: As of December 31, 2025, 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。2025 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 2025, 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 2025 年的尽职调查结果，并未出现供应商需要进行风险缓解的管理策略。所有供应商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 2025, 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。董事会基于对 SLR Consulting Ltd. 选择合作，主要以三个方面考虑，独立性、公正性、专业性，聘请 SLR Consulting Ltd. 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有开具了 1 个中风险不符合项提出，并于 3 月 26 日关闭。

The company strictly complies with the fourth step of the LBMA Silver Responsibility Guidelines, which states "Carry out independent third-party audits of the due diligence practices of refiners". The board of directors chose to collaborate with SLR Consulting Ltd. based on three main considerations: independence, impartiality, and professionalism. SLR Consulting Ltd. was hired to conduct the audit. The company has carried out reasonable audit work in accordance with international standards in the verification business. In the third-party independent audit of the previous year, one medium-risk non-compliance item was issued and was closed on March 26th.

在 2024 年度审核中，由于对一家名为广西华西矿业有限公司铜坑矿业分公司的<二级供应商>尽职调查不足，无法对他们进行溯源及未获取采矿许可证，导致供应链尽职调查表无法供审查，被开出一个中风险不符合项。随后经过关系经理与供应商进行接触并立即实施尽职调查。KYC 表格已详细填写，信息并由合规团队验证，未发现高风险因素，并于 2025 年 3 月 26 日关闭。

本年度评估中，公司体系运行良好，未被开出任何低风险、中风险和高风险的不符合项。

During the 2024 annual audit, due to insufficient due diligence on a <secondary supplier> named Guangxi Huaxi Mining Co., Ltd. Tongkeng Mining Branch, it was impossible to trace their origin and no mining license was obtained. As a result, the supply chain due diligence form could not be submitted for review, and a medium-risk non-compliance item was issued. Subsequently, the relationship manager contacted the supplier and immediately conducted due diligence. The KYC form was fully completed, and the information was verified by the compliance team. No high-risk factors were found, and the assessment was closed on March 26, 2025.

In this year's assessment, the company's system operation was good, and no low-risk, medium-risk or high-risk non-compliance items were issued.

2025 合 规 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 2025 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 2025 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, 2025, 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.