

申诉机制

Complaints Mechanism

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1 目的 Purpose

为加强精炼厂白银供应链合规性管理，根据《LBMA 负责任白银指南》的要求，确保供应链无侵犯人权、洗钱及恐怖分子筹资等行为。我公司制定了含银物料和销售审查制度，供应商都应配合公司尽职调查小组的审查。各供应商应遵守国家相关法律法规，对供应的白银确保来源和去向合规。允许公司的相关方（受影响人员或举报者）说出与采矿、贸易、加工和出口情况有关的疑虑并得到妥善处理。

In order to strengthen the refinery's silver supply chain compliance management, according to the requirements of the LBMA Responsible Silver Guidelines, to ensure that the supply chain is free from human rights violations, money laundering and terrorist financing. Our company has formulated a review system for silver-containing materials and sales, and all suppliers should cooperate with the company's due diligence team's review. Each supplier should comply with relevant national laws and regulations and ensure that the source and destination of the silver supplied are in compliance. Allow the Company's interested parties (affected persons or whistle blowers) to voice concerns about mining, trading, processing and exporting conditions and have them appropriately addressed.

2 依据 Basis

《LBMA 负责任的白银指南》、《LBMA 负责任的白银供应链尽职调查管理体系》。

LBMA Responsible Silver Guidance, and the LBMA Due Diligence Management System for Responsible Silver Supply Chains.

3 适用范围 Scope of application

本程序适用于本公司的相关方及本公司涉及负责任矿物采购相关工作的部门及人员。

This procedure applies to the Company's related parties and the Company's departments and personnel involved in tasks related to

responsible mineral procurement.

4 管理机构及职责 Management organization and responsibilities

公司设立申诉工作处理小组，成员由合规总监、合规官、合规专员组成，工作组负责对申诉的处理。

The Company has established a Grievance Handling Group consisting of the Director of Compliance, the Compliance Officer, and the Compliance Specialist, and the working group is responsible for the handling of grievances.

5 工作程序 Working procedures

5.1 申诉信息的收集

5.1 Gathering of Complaint Information

公司设立联系/申诉渠道：

The company has established contact/complaint channels:

合规总监/Director of Compliance: 李天顺 LI Tian shun

电话/Tel:0766-3829080 邮箱/E-mail: gdjinye@sina.com

公司在官网 <http://www.gdldjy.com> 《LBMA 负责任白银供应链尽职调查管理办法》中予以公布，电话、电子邮箱，用于接收相关的询问和申诉。由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。

The Company publishes on its official website <http://www.gdldjy.com> the LBMA Due Diligence Management Practices for Responsible Silver Supply Chains, a telephone number and an e-mail address for receiving relevant inquiries and complaints. The Company's Compliance Officer regularly reviews information received in the course of his/her work from interested parties regarding concerns about the responsible supply chain in relation to mining, trading, processing and exporting conditions.

5.2 申诉的内容

5.2 Content of the complaint

相关方对公司的供应链管理提起申诉时，该申诉需包含以下内容：

When party files a complaint against a company's supply chain management, the complaint must include the following:

1) 具体说明向何种决定提起申诉及理由。

1) Specify the decision being appealed and the reasons.

2) 附相关书面证据。

2) Attach relevant written evidence.

3) 具体说明在提出申诉之前采取了哪些步骤来解决问题。

3) Specific description of the steps taken to resolve the issue before filing the complaint.

5.3 申诉信息的分类

5.3 Classification of complaint information

公司需对接收到的询问和申诉信息进行分类识别，申诉信息分为一般信息、特殊/重要申诉信息、不予受理信息。

The company is required to categorize and identify the inquiries and complaint information it receives. Complaint information is classified into general information, special/important complaint information, and inadmissible information.

5.3.1 一般信息：相关方对公司负责任矿物供应链管理的咨询、供方的调查问卷等。

5.3.1 General information: Consultation on supply chain management of responsible minerals in companies by relevant parties, questionnaires from suppliers, etc.

5.3.2 特殊或重要申诉信息

5.3.2 Special or important complaint information

1) 管理不符合 LBMA 要求的信息。

1) Managing information that does not meet LBMA requirements.

2) 对供应商的矿物采购涉及公司识别的高风险区域的信息。

2) Information on suppliers whose mineral purchases involve high-risk areas identified by the company.

3) 对供应商的矿物采购不符合公司的供应链政策的信息。

3) Information that mineral purchases from suppliers do not comply with the company's supply chain policy.

5.3.3 不予受理信息

5.3.3 Information not accepted

1) 琐碎、恶意、无理取闹或似乎是为了获得竞争优势而产生的投诉。

1) Complaints that are frivolous, malicious, vexatious, or appear to be made to gain a competitive advantage.

2) 没有令人信服的客观证据支持的投诉。

2) Complaints not supported by convincing objective evidence.

5.4 申诉的处理

5.4 Handling of Complaints

5.4.1 关于匿名申诉

5.4.1 About anonymous complaints

支持匿名申诉，申诉工作处理小组不得对工作小组以外的任何人泄露申诉人信息，对于可能涉及申诉人信息的申诉内容予以保密，如申诉内容与工作小组成员有利害关系，工作小组应立即要求该成员避嫌。如发现有任何打击报复申诉人的情况，公司将对相关涉事员工按公司章程严肃从重处理，如涉嫌违法犯罪，立即报案并移送司法机关处理。

Supporting anonymous complaints, the complaint handling team shall not disclose the complainant's information to anyone outside of the working group, and the content of the complaint that may involve the complainant's information shall be kept confidential, and if the content of the complaint has an interest in a member of the working group, the working group shall immediately ask the member to avoid suspicion. If any retaliation against the complainant is found, the company will seriously deal with the

employees involved in accordance with the company's articles of association, and if they are suspected of violating the law or committing a crime, they will be reported to the police and transferred to the judicial authorities immediately.

5.4.2 申诉处理流程

5.4.2 Complaints Process

申诉处理小组工作组应在收到申诉后 10 个工作日内确认收到申诉，在基于申诉是否符合 5.3 的基础上确认接受或拒绝申诉。如果申诉被拒绝，应向申诉方提供书面解释，并记录在案。不得采取进一步行动。

The Grievance Handling Panel Working Group shall acknowledge receipt of the grievance within 10 working days of receipt of the grievance, confirming acceptance or rejection of the grievance on the basis of whether the grievance complies with 5.3. If the grievance is rejected, a written explanation shall be provided to the grieving party and documented. No further action shall be taken.

对特殊重要申诉信息由申诉处理小组在决定受理后 45 个工作日内对上诉或投诉进行调查、审查和裁决。处理小组应尽最大努力在截止日期前完成工作。在极少数情况下可能需要额外的时间。申诉处理小组应采取合理措施，包括召开一次或多次会议，以作出合理决定。这类措施的例子包括：

The appeal or complaint shall be investigated, reviewed and adjudicated by the Grievance Handling Panel within 45 working days of the decision to accept the appeal or complaint for exceptionally important grievance information. The processing team should make every effort to meet the deadline. In rare cases additional time may be required. The Grievance Processing Panel shall take reasonable measures, including one or more meetings, to reach a reasoned decision. Examples of such measures include.

1) 咨询专家。

1) Consult an expert.

2) 请求申诉方或其他人提供更多信息。

2) Request the complainant or others to provide more information.

3) 申诉方不合作可被视为中止该程序的理由。申诉处理小组应协商一致决定是否中止申诉程序。

3) Failure to cooperate by the complainant may be considered grounds for discontinuing the procedure. The Grievance Handling Panel shall decide by consensus whether to discontinue the grievance procedure.

4) 申诉决定以书面形式传达给申诉方，申诉决定应包含：申诉决定内容以及何时做出的、任何新的建议。

4) The grievance decision is communicated in writing to the grieving party, and the grievance decision shall contain: the content of the grievance decision and when it was made, and any new recommendations.

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 officer regularly summarizes the results of risk situation processing and publicizes the content of the complaint, processing method and results on the company's official website. The compliance officer is responsible for supervising the implementation of risk mitigation measures throughout the process and reporting the progress to the compliance director in a timely manner, and after the implementation of the risk mitigation measures has been completed, the compliance director regularly evaluates the effectiveness of the measures and makes a summary and evaluation.

5.5 申诉的记录

5.5 Record of Complaints

申诉工作处理小组应将收到的申诉记录在案，包括以下内容：

The Complaints Handling Team shall keep a record of the complaints

received, including the following:

1) 何人何时提交申诉。

1) Who files a complaint and when.

2) 申诉的类型、问题或主题以及随申诉提交的信息。

2) The type of complaint, the issue or subject, and the information to be submitted with the complaint.

3) 接受或拒绝决定。

3) Accept or reject the decision.