



ZJTY

紫金铜业有限公司企业标准

Zijin Copper Co., Ltd. Corporate Standard

ZJTY/TQ-Q-104-2024

白银供应链尽职调查管理办法

Silver Supply Chain Due Diligence Management Measures

2024-11-18发布

2024-11-18实施

Published on 2024-11-18

Effective as of 2024-11-18

紫金铜业有限公司 发布

目录

CONTENTS

第一章 总则	1
1. GENERAL PROVISIONS	1
第二章 白银供应链尽职调查规则适用范围及术语	1
2. APPLICATION SCOPE AND TERMS	1
第三章 白银供应链公司内部管理体系	11
3. INTERNAL MANAGEMENT SYSTEM OF SILVER SUPPLY CHAIN	11
第四章 识别和评估供应链的风险	29
4. IDENTIFYING AND ASSESSING SUPPLY CHAIN RISKS	29
第五章 针对已识别的风险制定并实施风险管理策略	49
5. DEVELOPING AND IMPLEMENTING RISK MANAGEMENT STRATEGIES FOR IDENTIFIED RISKS	49
第六章 白银供应链尽职调查的审查和合规性评价	55
6. SILVER SUPPLY CHAIN DUE DILIGENCE REVIEW AND COMPLIANCE EVALUATION	55
第七章 白银供应链尽职调查文件记录管理	58
7. SILVER SUPPLY CHAIN DUE DILIGENCE DOCUMENTATION RECORDS MANAGEMENT	58
8.第八章 附则	60
8. SUPPLEMENTARY PROVISIONS	60

白银供应链尽职调查管理办法

Silver Supply Chain Due Diligence Management Measures

第一章 总 则

1. GENERAL PROVISIONS

第一条 为确保公司白银供应合法合规，建立透明的白银供应链，以及公司可持续参与国际白银供应并获得利益，防止因白银供应引发冲突、侵犯人权和造成不稳定等，特制订本管理办法。

Article 1 *The Silver Supply Chain Due Diligence Management Measures* have been specially formulated to guarantee the legal compliance of Zijin Copper Co. Ltd. (hereinafter referred as “the Company”) silver supply, establish a transparent silver supply chain, realize the Company’s sustainable participation in international silver supply and prevent conflicts, violations of human rights, and instability caused by silver supply.

第二章 适用范围及术语

2. APPLICATION SCOPE AND TERMS

第二条 本白银供应链尽职调查规则，适用于紫金铜业有限公司，以及与紫金铜业有限公司有白银交易、白银加工的所有白银供应商、白银相关合作伙伴（包括白银生产商、中间商、白银交易商、出口商和运输商等）。

Article 2 *The Measures* applies to the Company, as well as all silver suppliers and silver-related partners (including silver producers,

intermediaries, silver traders, exporters and transporters) who have silver trading and silver processing cooperation with the Company.

第三条 引用术语

Article 3 Terms Quoted

1. **受冲突影响和高风险区域 (CAHRA)**：受冲突影响和高风险区域的特点是存在武装冲突、大范围暴力活动或其他有害于民众的风险。武装冲突的形式多种多样，如国际冲突或非国际冲突，有可能涉及两个或两个以上的国家，也有可能是解放战争、叛乱、内战等。高风险地区是指有可能存在政局不稳或政治压迫、制度缺陷、不安全因素、民用基础设施崩溃，以及广泛暴力活动的地区。通常这类地区的特点是存在广泛侵犯人权和违反国际法或国内法的现象。

1. **Conflict-affected and high-risk areas (CAHRA)** are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as an international and non-international conflict, which may involve two or more states, or may consist of wars of liberation, insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.

2. **人权**：人权是指联合国发布的《国际人权法案》中定义的人权。该法案包括联合国发布的《世界人权宣言》（1948年）《经济、社会、文化权利国际公约》（1966年）《公民权利和政治权利国际公约》（1966年）及其两项任择议定书（关于申诉程序和关于死刑）。

同时人权还应执行联合国商业与人权指导原则，关注妇女、儿童、残疾人、少数民族以及其他弱势群体的权利标准，保护他们免受许多社会中长期普遍存在的歧视。

2. Human rights are those defined in the *International Bill of Human Rights* issued by the United Nations. The Bill includes the *Universal Declaration of Human Rights (1948)*, the *International Covenant on Economic, Social and Cultural Rights (1966)*, the *International Covenant on Civil and Political Rights (1966)*, and its two optional protocols (on the complaints procedure and on the death penalty) issued by the United Nations. At the same time, human rights should also be responsive to the United Nations Guiding Principles on Business and Human Rights, focusing on standards for the rights of women, children, persons with disabilities, ethnic minorities and other vulnerable groups, and protecting them from the discrimination that persists in many societies.

3. 手工和小规模采矿 (ASM): 采用简化勘探、开采、加工和运输形式的正式或非正式采矿作业。ASM 并非资本密集型产业，是采用高劳动密集型技术。它可包括个人作业以及在家庭团体、合伙中作业的男子和妇女，以及合作社成员或其他类型法人及涉及数百名甚至数千名矿工的企业的成员。小型机械化采矿亦可被视为 ASM。

3. Artisanal and Small-Scale Mining (ASM) refers to Formal or informal mining operations using simplified forms of exploration, extraction, processing and transportation. ASM is not a capital-intensive industry, but employs highly labor-intensive techniques. It can include individual operators as well as men and women working in family groups, partnerships, members of cooperatives or other types of legal

persons and enterprises involving hundreds or even thousands of miners. Small-scale mechanized mining can also be considered ASM..

4.大规模采矿 (LSM)：大规模采矿指以大量资本、重型设备、高技术和显著劳动力（大中型）为特征的，不被视为手工或小规模开采方式的矿石开采作业。

4. Large-Scale Mining (LSM) refers to ore mining operations characterized by large amounts of capital, heavy equipment, high technology, and a significant labor force (medium to large) that are not considered artisanal or small-scale mining methods.

5.开采银（也称原生银）：来自大型及/或中型矿山或手工和小规模矿山且之前从未精炼过的白银。本术语指矿山储藏或出产的任何白银或含银材料（不论其形式、形状和品位为何），直至其完全提炼（995%或更高），制成白银精炼产品（如银条、银粒）并销售。其来源为开采银所在的矿山。其分类主要有：

5. Mined Silver (also referred to as “Primary Silver”) refers to LSM or ASM that has never been previously refined. The term refers to any silver or silver-bearing material (in whatever form, shape and grade) that is stored or produced by a mine until it is fully refined (995% or higher) into refined silver products (e.g., silver bars, silver pellets) and sold. Its source is the mine where the silver is extracted. The main categories are:

(1) 银矿石：含有经济价值的白银浓缩物的岩石或砾石。该浓缩物按重量计算可能很小，例如每吨矿石只有1克白银，但在中型和大型工业采矿中仍然具有经济可采性。白银矿石由于其体积和重量，通常不会远离矿山进行加工。

(1) Silver Ore: Rock or gravel that contains an economically valuable silver concentrate. The concentrate may be small by weight, for

example, as little as 1 gram of silver per ton of ore, but is still economically recoverable in medium- and large-scale industrial mining. Silver ore, because of its size and weight, is not usually processed far from the mine.

(2) 白银精矿：在为实现更高品位而进行的银矿石加工过程中产生的一种中间物质，但仍需要进一步的中间加工来制成银锭。白银精矿通常会运送到附近的白银冶炼厂制成银锭。

(2) Silver Concentrate: An intermediate substance produced during the processing of silver ore to achieve higher grade, but still requiring further intermediate processing to make silver ingots. The silver concentrate is usually transported to a nearby silver smelter to be made into ingots.

(3) 银锭：新开采银的合金块，一般通过矿石的广泛加工和在矿山熔炼产生，具有高浓度(纯度通常为 85%-90%)。这种形式的开采银尚未达到商业级质量，必须运输到精炼厂直接提炼，但不需要进一步的中间加工。

(3) Silver Ingots: Alloy blocks of freshly mined silver, generally produced through extensive processing of the ore and smelting at the mine, with high concentrations (purity usually 85%-90%). This form of mined silver is not yet of commercial grade quality and must be transported to a refinery for direct refining, but does not require further intermediate processing.

6. 采矿副产品：在贱金属（例如铅、锌或铜矿石）开采过程中获得的白银，其中银可能是一种微量成分。其来源为痕量白银第一次从它的母矿石中分离出来的时间点(例如精炼厂)。精炼商的尽职调查应确保不进行虚假陈述，以采矿副产品掩盖新开采银的来源。

6. Mining by-products: Silver obtained during the mining of base metals (e.g. lead, zinc, or copper ores) where silver may be a trace component. Its source is the point in time when trace silver is first separated from its parent ore (e.g. refinery). Refiners' due diligence should ensure that misrepresentations are not made to disguise the source of newly mined silver with mining by-products.

7.再生银：该术语传统上包括任何在首个白银生命周期并非直接来自矿山的含银物质。实际上，它涉及由 LBMA 精炼商或下游中间加工者采购的白银（包括终端用户及消费者使用后的废旧产品、废金属，以及在精炼和产品制造过程中产生的材料，以及投资白银和含银产品），这些白银将返回精炼商，开始新的生命周期。这一类别还可能包括已加工成颗粒的精炼白银、合格交割银条、奖章和硬币，这些物品先前由精炼厂出售给制造商、银行或消费者市场，此后可能需要退还给精炼厂以收回其经济价值，或转化为其他产品（例如 1 千克银条）。其来源为白银供应链中白银返回到精炼商或其他下游中间加工商或回收商的点。其分类主要有：

7.Recycled Silver: This term has traditionally included any silver-bearing material that does not come directly from a mine in its first silver life cycle. In practice, it relates to silver purchased by LBMA refiners or downstream intermediate processors (including end-user and consumer used products, scrap metal, and materials generated during the refining and product manufacturing processes, as well as investment silver and silver-containing products), which is returned to the refiner to begin a new life cycle. It may also include refined silver that has been processed into pellets, qualifying delivery silver bars, medals and coins, which have previously been sold by refiners to manufacturers, banks or

the consumer market and which may thereafter need to be returned to the refiner to recover their economic value or converted into other products (e.g., silver bars of 1 kilogram). Its source is the point in the silver supply chain where silver is returned to refiners or other downstream intermediate processors or recyclers. It is categorized into the following main categories:

(1) 未加工可回收白银：在返回加工及精炼前且仍为原形及/或制造废料的回收白银（例如银条、珠宝首饰、饰物、硬币、车屑等）。

(1) Unprocessed Recoverable Silver: Recoverable silver (e.g., silver bullion, jewelry, ornaments, coins, car scraps, etc.) that remains in its original form and/or as manufacturing scrap prior to being returned to processing and refining.

(2) 已融化可回收白银：在第一次回收流程中融化并铸造成原始的银条或其他形状（尺寸不明，细度不一）的可回收白银。

(2) Melted Recoverable Silver: Recoverable silver that has been melted and cast into original bars or other shapes (of unknown size and fineness) during the first recovery process.

(3) 工业副产品：在加工另一种材料时产生的一种材料，不是主要的预期产品，但却是一种单独的有用材料。例如白银精炼通常会产生低价值的副产品，如炉烟尘、废坩埚和地板清扫物。

(3) Industrial By-product: A material produced during the processing of another material that is not the primary intended product, but is a separately useful material. For example, silver refining typically produces low-value by-products such as furnace soot, spent crucibles and floor sweepings.

(4) 混合材料：包括多种来源的材料(例如开采和回收的矿物/金属)。混合材料并非常见的做法，应该被视为危险信号。应根据负责白银指南的全部要求，对混合白银的来源进行尽职调查。

(4) Mixed Materials: It includes materials from multiple sources (e.g. mined and recycled minerals/metals). Mixed materials are not common practice and should be considered a red flag. Due diligence should be performed on the sources of mixed silver in accordance with the full requirements of *The Guidelines*.

8.官方库存：存放于白银银行金库、中央银行金库、交易所和精炼商且可核查日期为2018年1月1日前的白银投资产品（银锭、银条、银币和银粒，存放于密封容器），该等白银不需要确定其来源。这包括代表上市实体的第三方持有的库存。

8. Official Inventories: Silver investment products (silver ingots, bars, coins and pellets, stored in sealed containers) deposited in silver bank vaults, central bank vaults, exchanges and refiners and verifiably dated prior to January 1, 2018, which do not need to be identified as to their origin. It includes inventory held by third parties on behalf of listed entities.

9.白银供应对手方：直接与白银精炼商接触的白银供应商。

9. Silver Supply Counterparties: Silver suppliers who are in direct contact with silver refiners.

10.中间精炼商：在交付合格交割清单精炼商之前对原料进行精炼处理的非合格交割清单精炼商。中间精炼商通常会将各种原料流（如珠宝废料、电子废料和工艺回收物）合并成可行的批次进行精炼。若仅执行熔化操作，不会被视为中间精炼商。

10. Intermediate Refiner: A non-qualified delivery list (QDL)

refiner that refines feedstock prior to delivery to a QDL refiner. Intermediate refiners typically combine various feedstock streams (e.g., jewelry scrap, electronic scrap, and process recyclables) into viable batches for refining. If only melting operations are performed, they will not be considered intermediate refiners.

11.政治人物(PEP): 当前及先前经特定国家委托承担重要公共职能的个人及其家庭成员和亲密伙伴(不论位于国内或国外)。这些人士包括国家或政府首脑、资深政治家和政府官员、国有企业的高级管理人员以及重要的政党官员。PEP 的定义无意涵盖上述类别中的中级或更初级的个人。许多 PEP 所担任的职位可能会被用于对非法资金进行洗钱或其他基于权力滥用的犯罪行为(如腐败或贿赂)。PEP 身份并不表示会发生犯罪行为,但它带来的额外风险敞口意味着精炼商在建立业务关系时必须应用额外的反洗钱-打击恐怖主义融资措施。

11. Politically Exposed Persons (PEPs): Individuals and their family members and close associates who are currently and have previously been entrusted with important public functions by a given state (whether located within or outside the country). These include heads of state or government, senior politicians, and government officials, senior executives of state-owned enterprises, and important political party officials. The definition of PEPs is not intended to cover individuals at the middle or more junior levels of the above categories. Many PEPs hold positions that could be used to launder funds against illicit financing or other criminal acts based on the abuse of power (e.g., corruption or bribery). PEP status is not an indication that a criminal act will be committed, but the additional risk exposure it creates means that

refiners must apply additional anti-money laundering-combating the financing of terrorism (AML-CFT) measures when entering into business relationships.

12. 供应商：指任何个人或组织在白银和含银材料供应链的参与者。

12. Supplier: It refers to any individual or organisation that is a participant in the supply chain of gold and gold-bearing materials.

13. 世界遗产地：联合国教育、科学及文化组织（“教科文组织”）选定的具有文化、历史、科学或其他重要意义并受国际条约法律保护的地标或地区。这些遗址被认为对人类的集体利益很重要。

13. World Heritage Sites: Landmarks or areas selected by the United Nations Educational, Scientific and Cultural Organization (UNESCO) as being of cultural, historical, scientific, or other significance and legally protected by international treaties. These sites are considered important for the collective good of humanity.

14. 保护区：保护区指通过法律或其他有效手段予以认可和管理 的界定明确的专用地理空间，以实现对自然的长期保护，并提供相关的生态系统服务和文化价值。保护区包括国家公园、荒野地区、社区保护区、自然保护区等区域。

14. Protected areas: Protected areas are well-defined and dedicated geographic spaces recognized and managed through legal or other effective means to achieve the long-term conservation of nature and to provide associated ecosystem services and cultural values. Protected areas include areas such as national parks, wilderness areas, community conservation areas, and nature reserves.

15. 最终实益拥有人（UBO）：指最终拥有或控制客户的自然人

及/或交易乃代表其开展的自然人，还包括那些对法人或安排行使最终有效控制权(定义为 10%或以上的所有权)的人士。

15. Ultimate Beneficial Owner (UBO): It refers to the natural person who ultimately owns or controls the client and/or on whose behalf the transaction is carried out, and also includes those who exercise ultimate effective control (defined as 10% or more ownership) over the legal person or arrangement.

16. 尽职调查：为准备商业交易及维持关系过程中对相关公司或组织进行的研究和分析。根据精炼商的意愿，需要评估的活动应包括《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》附件二中确定的风险、洗钱以及环境、社会和治理责任。

16. Due Diligence: Research and analysis of a company or organization done in preparation for a business transaction and throughout the relationship. Activities to be assessed, based on the Refiner's appetite, should include those risks identified in the Annex II of the *OECD Due Diligence Guidance for Responsible Supply Chains of Ore from Conflict-Affected and High-Risk Regions*, such as money laundering, as well as environment, social, and governance responsibilities.

第三章 白银供应链公司内部管理体系

3. INTERNAL MANAGEMENT SYSTEM OF SILVER SUPPLY CHAIN

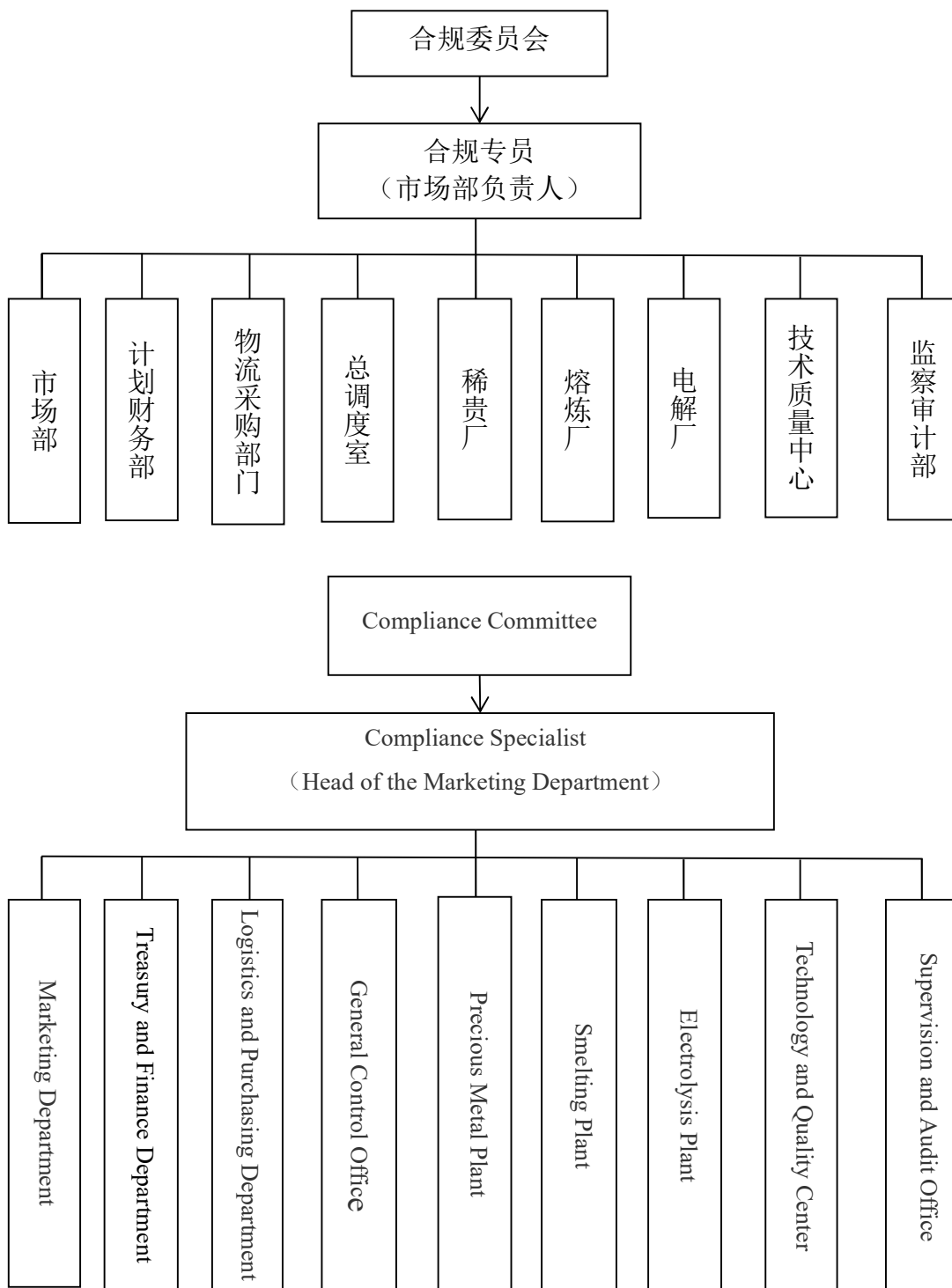
第四条 白银供应链公司内部组织架构

Article 4 Internal Organizational Structure

紫金铜业有限公司为确保尽职调查管理的有效运营与监督提供

充足的内部管理支持和资源，设立尽职调查组织结构如下：

The Company has established the following due diligence organizational structure in order to ensure sufficient internal management support and resources for the effective operation and supervision of due diligence management:



第五条 白银供应链公司内部组织责任

Article 5 Internal Organizational Responsibilities

1. 合规委员会

1. Compliance Committee

公司设立以总经理为董事，公司分管市场部副总经理、公司监事会主席、副总经理组成的合规委员会，主要职责如下：

1. The Company has established a Compliance Committee with the General Manager as a director, the Company's Deputy General Manager in charge of the Marketing Department, the Chairman of the Supervisory Committee of the Company, and the Deputy General Manager as members, with the main duties as follows:

(1) 以国家的法律法规，客户以及行业和适用的国际标准要求为基础，负责建立、实施和维护公司的白银供应链尽职调查管理；

(1) Responsible for establishing, implementing and maintaining the Company's Silver Supply Chain Due Diligence Management based on national laws and regulations, customer and industry and applicable international standard requirements.

(2) 任命合规专员负责白银供应链事宜；

(2) Appointing a Compliance Specialist to be responsible for silver supply chain matters.

(3) 对负责该体系的相关部门和人员进行评估、监督；

(3) Evaluating and supervising the relevant departments and personnel responsible for the system.

(4) 组织建立内部问责制或同等作用的制度，确保体系的有效实施；评估包括公司政策在内的关键信息是否有有效的结构和沟通流程，以传达至相关员工和白银供应对手方；

(4) Establishing internal accountability or its equivalent to ensure effective implementation of the system; and assessing whether key messages, including company policies, are effectively structured and communicated processes are in place to reach relevant employees and silver supply counterparties.

(5) 协调解决尽职调查管理体系实施和运行中所需资源和出现的问题;

(5) Coordinating the resolution of resource requirements and issues arising from the implementation and operation of the due diligence management system.

(6) 负责组织公司白银供应链尽职调查管理信息的审查、批准等;

(6) Organizing the review and approval of the Company's silver supply chain due diligence management information.

(7) 负责审批是否与最初被评为的新高风险供应链/供应商合作, 每年组织重新评估审批是否继续业务合作, 合同签订及对供应商进行审查;

(7) Approving whether to work with new high-risk supply chains/suppliers initially rated, organizing annual reassessment approvals for continuation of business cooperation, contracting and review of suppliers.

(8) 每年至少组织一次评估白银供应链尽职调查政策和流程的有效性, 以推动持续改进。

(8) Organizing an assessment of the effectiveness of the silver supply chain due diligence policies and processes at least once a year to drive continuous improvement.

2. 合规专员

2. Compliance Specialist

由市场部负责人担任，主要职责如下：

It is served by the Head of the Marketing Department with the following main responsibilities:

(1) 定期组织审查白银供应链尽职调查过程；

(1) Organizing periodic reviews of the silver supply chain due diligence process.

(2) 负责组织将公司政策在内的关键信息等传达给相关员工和白银供应对手方；

(2) Organizing the communication of key information, including company policies, to relevant employees and silver supply counterparties.

(3) 负责组织对相关员工进行白银尽职调查管理和尽责管理体系培训；

(3) Organizing training on silver due diligence management and due diligence management system for relevant employees.

(4) 负责组织编写和修订公司的白银供应链尽职调查政策和程序；

(4) Organizing the preparation and revision of the Company's Silver Supply Chain Due Diligence Policy and Procedures.

(5) 负责组织执行“了解您的供应商”（KYS）流程并审核；

(5) Organizing the implementation of the Know Your Supplier (KYS) process and auditing it.

(6) 负责组织对白银尽职调查管理工作中相关工作，如风险管理策略、风险改进进展和状态等汇报给合规委员会。

(6) Organizing reporting to the Compliance Committee on work related to silver due diligence management efforts, such as risk management strategies, risk improvement progress and status.

3. 合规小组

3. Compliance Group

合规小组由市场部、计划财务部、物流采购部门、总调度室、稀贵厂、熔炼厂、电解厂、技术质量中心、监察审计部等指派的人员组成。合规小组对白银供应链上各自职责范围内工作负责，确保在高风险供应链或交易时采取恰当的措施。

The Compliance Group consists of assigned personnel from the Marketing Department, Finance and Treasure Department, logistics and procurement related department, General Control Office, Rare Precious Plant, Smelting Plant, Electrolysis Plant, Technology and Quality Center, and Supervision and Audit Department. The Compliance Group is responsible for their respective areas in the silver supply chain to ensure that appropriate measures are taken in the event of a high risk supply chain or transaction.

(1) 负责具体实施白银供应链尽职调查过程，如果认为必要，尽职调查过程中有权要求提供附加文件或信息。

(1) Responsible for the specific implementation of the silver supply chain due diligence process, with the right to request additional documents or information during the due diligence process if deemed necessary.

(2) 如发现存在高风险供应链或交易，需要及时向合规专员汇报。

(2) If there is a high-risk supply chain or transaction, it needs to be

reported to the Compliance Specialist in a timely manner.

(3) 起草和更新白银供应链规则，为合规委员会履责提供准确的信息。

(3) Drafting and updating silver supply chain rules to provide accurate information for the Compliance Committee to fulfill its responsibilities.

(4) 协助与鼓励现货白银供应商承诺且书面确认遵守白银供应链尽职规则；

(4) Assisting and encouraging spot silver suppliers to commit to and confirm in writing their compliance with the *Silver Supply Chain Due Diligence Rule*.

(5) 如出现异常情况需及时向合规专员报告。

(5) Any anomalies need to be reported to the Compliance Specialist timely.

4. 技术质量中心

负责原料银的称重、取制样、成分化验分析。

4. Technology and Quality Center is responsible for weighing, sampling, and analyzing the composition of raw silver.

5. 生产厂

负责原料银投料前保管，组织投料生产，做好投料记录，在生产过程中采用封闭式流程，确保白银生产加工的安全性与可追溯性。

5. Production plants are responsible for the custody of raw material silver before feeding, organizing the feeding production, making good feeding records, and adopting a closed process in the production process to ensure the safety and traceability of silver production and processing.

6. 总调度室

负责组织做好库存、投入和产出能力的计算和核查。

6. General Control Office is responsible for organizing the calculation and verification of inventory, input and output capacity.

7. 市场部、物流采购部门负责产地鉴别记录，对交货人身份信息进行确认，识别并收集公司的每一笔白银供应链物料的交易记录，以及本体系所需要的每一笔物料的监管链信息，保证原料银接收的准确性；市场部应保存与官方政府（如国有企业等）的交易信息；市场部在交易过程中，采用监督机制，确保交易的安全性，保证公司不参与恐怖主义融资。市场部制定培训计划，对所有相关员工组织培训，学习 LBMA 负责任白银指南相关内容，准确掌握公司负责任白银管理的相关政策。

7. Marketing Department and logistics and procurement related department are responsible for origin identification records, confirming the deliverer information, identifying and collecting the Company's transaction records of every silver supply chain material, as well as the chain-of-custody information of every material required by this system, so as to ensure the accuracy of the raw material silver receipts. The departments shall keep the transaction information with the government (e.g., state-owned enterprises, etc.). The department shall, in the process of transaction, adopt a supervisory mechanism to ensure the security of the transactions and guarantee that the company does not participate in terrorist financing. Marketing Department develops training plans and organizes training for all relevant employees to learn the contents of *the LBMA Responsible Silver Guidelines* and accurately grasp the Company's policies on responsible silver management.

8. 计划财务部

负责原料银、白银等的交易并保存相关交易凭证，交易应通过官方银行等渠道，不应进行任何现金交易。交易凭证包括但不限于供应商结算单、出库批次明细、银行回单、客户相关合法资质证明等，记录保存至少 5 个会计年度；负责组织每年度财务报表审计（资产负债表）并于每年第一季度末提交；如交易过程出现异常情况需及时向合规专员报告并采取相应措施。

8. Finance and Treasure Department is responsible for the transactions of raw material silver, silver, etc. and keeping the relevant transaction certificates. The transactions should be made through official banks and other channels, and there should not be any cash transactions. Transaction documents include but are not limited to suppliers' settlement statements, details of outgoing batches, bank statements, customers' relevant legal qualifications, etc., and the records should be kept for at least five fiscal years. The department is responsible for organizing the audit of the annual financial statements (balance sheets) and submitting them by the end of the first quarter of each year. Any abnormalities that occur in the course of the transactions should be reported to the Compliance Specialist timely, and the corresponding measures should be taken.

第六条 白银可追溯性系统

Article 6 Silver Traceability System

为了确保公司对自身的运营和所采购物料的充分管控，公司须建立确保供应链可见性和透明度的控制系统，包括用以确定白银的来源和供应链中涉及的上游合作伙伴的托管链或可追溯性系统，以及跟踪每批精炼原料的输入以及每批产品装运的第一个目的地的机制。可追溯性系统应收集和维护每批开采银、再生银或其他精炼原

料的供应链信息，包括但不限于：

In order to ensure that the Company has adequate control over its own operations and the materials it purchases, the Company shall establish control systems to ensure visibility and transparency of the supply chain, including a chain of custody or traceability system to identify the source of the silver and upstream partners involved in the supply chain, as well as a mechanism for tracking the inputs of each batch of refined raw materials and the first destination of each shipment of product. The traceability system shall collect and maintain supply chain information for each shipment of mined silver, recycled silver or other refined feedstock, including but not limited to:

1. 初级产品的开采原产地证明，如官方签发的原产地证明、经审核保管链文件、区块链可追溯性记录、正式装箱单等。

1. Proof of mining origin for primary products, such as officially issued certificates of origin, audited chain-of-custody documents, blockchain traceability records, and official packing lists.

2. 再生银和官方库存的来源证明，如经审核保管链信息、区块链可追溯性记录、正式发票或装箱单等。

2. Proof of origin of recycled silver and official inventory, such as audited chain of custody information, blockchain traceability records, official invoices or packing lists.

3. 每批精炼原料的输入以及每批产品输出的唯一编号信息。

3. Unique numbering information for each batch of refined raw material input and each batch of product output.

4. 精炼原料的类型及来源、重量、品位及白银产品重量、品位等信息。

4. Information on the type and source of refining raw materials, their weight and grade, and the weight and grade of silver products.

5. 高风险交易的进口和出口表格。

5. Import and export forms for high-risk transactions.

6. 精炼原料从产地到公司的保管链的货运/运输信息及单据，如运单/空运单、形式发票等。

6. Freight/transportation information and documents for the chain of custody of the refined raw materials from the place of origin to the company, such as waybills/airwaybills, pro forma invoices, etc.

7. 到货日期和检验完成日期。

7. Date of arrival and date of completion of inspection.

8. 每批白银产品装运第一个目的地台账。

8. First destination ledger for each shipment of silver products.

第七条 与白银供应对手方的合作

Article 7 Cooperation with Silver Supply Counterparties

公司致力于与白银供应对手方长期深度的合作，并与其建立负责任的采购关系，在可能的情况下，公司会将自己的尽责管理体系上的经验以及相关信息共享给白银供应对手方，以提升白银供应对手方的尽责管理绩效。

The Company is committed to long-term, in-depth cooperation and responsible sourcing relationships with its silver supply counterparties, and where possible, the Company will share its experience in due diligence management systems and related information with its silver supply counterparties in order to enhance the silver supply counterparties' due diligence management performance.

1. 物流采购部门、市场部负责与白银供应对手方沟通，应确保

将公司的《白银供应链尽职调查政策》及公司对白银供应对手方根据本办法开展尽责管理的要求和期望传达给白银供应对手方，并要求白银供应对手方签订《遵守矿产供应链尽责管理政策承诺书》。对声明已建立矿产尽责管理政策的白银供应对手方，公司将收集并评估供应商的矿产尽责管理政策，若供应商尽责管理政策评估符合公司《白银供应链尽职调查政策》相关要求，公司将接受白银供应对手方的矿产尽责管理政策作为白银供应对手方承诺书的替代性文件。

1. Logistics and procurement related department and Marketing Department are responsible for communicating with silver supply counterparties and shall ensure that the Company's *Silver Supply Chain Due Diligence Policy* and the Company's requirements and expectations for silver supply counterparties to carry out due diligence management in accordance with this approach are communicated to silver supply counterparties, and shall require silver supply counterparties to sign the *Commitment to Comply with the Mineral Supply Chain Due Diligence Management Policy*. For Silver Supply Counterparties that state that they have established a "Mineral Due Diligence Management Policy", the Company will collect and assess the supplier's Policy, and if the assessment of the supplier's due diligence management policy is in compliance with the relevant requirements of the Company's *Silver Supply Chain Due Diligence Policy*, the Company will accept the supplier's Policy as an alternative to *the Commitment*.

2. 物流采购部门、市场部负责与白银供应对手方沟通，应在合同（或协议）中明确需遵守公司《白银供应链尽职调查政策》及相关要求或白银供应对手方已建立的矿产尽责管理政策符合公司《白

银供应链尽职调查政策》相关要求。

2. Logistics and procurement related department and Marketing Department are responsible for communicating with the silver supply counterparty, and should make it clear in the contract (or agreement) that they need to comply with the Company's *Silver Supply Chain Due Diligence Policy* and the relevant requirements or that the silver supply counterparty has already established a "Mineral Due Diligence Management Policy" in line with the relevant requirements of the Company's *Silver Supply Chain Due Diligence Policy*.

3. 物流采购部门、市场部应审查白银供应对手方尽责管理体系的建立和实施情况，并将该要求作为公司合格供应商的审查标准之一。审查详情请见以下表格：

3. Logistics and procurement related department and Marketing Department shall review the establishment and implementation of the due diligence management system for silver supply counterparties and make this requirement one of the review criteria for qualified suppliers of the Company. For details of the review, please refer to the table below:

编号	审查内容	审查标准
1	是否能提供完整的供应链地图	<ul style="list-style-type: none"> 如无法满足编号 1-3 的任意一项，则无法批复为合格供应商； 编号 4-7 作为信息收集项。
2	是否能配合填写并提供 KYS	
3	是否能接受并签订负责任采购的相关协议	
4	是否建立负责任采购供应链政策	
5	是否开展供应链的风险评估和风险缓解	
6	是否公开其尽责管理采购实践	
7	是否参与任何矿产供应链尽责管理第二、三方审计项目	

NO.	Review Content	Review Criteria
1	Availability of a complete supply chain map	<ul style="list-style-type: none"> • Failure to meet any of NO. 1-3 will result in failure to be approved as a qualified vendor; • No. 4-7 as an information collection item.
2	Ability to cooperate in completing and providing KYS	
3	Ability to accept and enter into agreements related to responsible procurement	
4	Establishment of a responsible sourcing supply chain policy	
5	Availability of supply chain risk assessment and risk mitigation	
6	Whether to publicize its due diligence management procurement practices	
7	Involvement in any Mineral Supply Chain Due Diligence Management (MSCDDM) second and third party audit programs	

4. 公司也在可能的情况下与下游企业进行沟通合作，鼓励下游企业了解矿产供应链尽责管理的信息和活动，在确保保守公司商业机密的前提下，向客户的下游企业传达公司的尽责管理的相关信息。同时，公司也鼓励在供应链中的上下游重要参与者一起开展尽责管理并加入行业审计，协助白银供应对手方或潜在供应商（包括合法的 ASM 和当地贸易商），改善其供应链实践，促进负责任采购的最佳实践。

4. The Company also communicates and cooperates with downstream companies where possible to encourage downstream companies to be aware of mineral supply chain due diligence management information and activities, and communicates information about the Company's due diligence management to its customers' downstream companies while ensuring the Company's commercial confidentiality. The Company also encourages key players upstream and downstream in the supply chain to work together on due diligence management and join industry audits to assist silver supply counterparties or potential suppliers, including legitimate ASMs and local traders, to improve their supply chain practices and promote responsible sourcing best practices.

第八条 申诉机制

Article 8 Complaint Mechanisms

1. 公司制定了矿产供应链尽责管理体系的申诉机制，允许任何利益相关方就公司矿产供应链在开采、贸易、处理和出口的情况发表意见。

1. The company has developed a mechanism for its mineral supply chain due diligence management system, which allows any stakeholder to comment on the Company's mineral supply chain in terms of mining, trading, processing, and exporting.

2. 公司的申诉渠道如下，并将该渠道公布在公司的网站上：

2. The Company's complaint channel is as follows, which is also posted on the Company's website:

电话：86-0597-3626837

Tel: 86-0597-3626837

邮箱：zjtyxsyk@zijinmining.com

E-mail: zjtyxsyk@zijinmining.com

公司网址：<http://www.zijinty.com/newsshow/274.html>

Website: <http://www.zijinty.com/newsshow/274.html>

3. 申诉范围

3.Complaint Scope

任何内外部的利益相关方可就公司产品中涉及的涵盖在办法中的物料的开采、贸易、处理和出口过程中，存在的侵犯人权，助长冲突，治理，环境保护和职业健康安全、不利 ESG 因素的问题提出意见、建议或申诉。

Any internal or external stakeholder may make comments, suggestions or complaints regarding human rights abuses, conflict

promotion, governance, environmental protection and occupational health and safety, and adverse ESG factors in the extraction, trade, handling, and export of materials covered by *the Measures* that are involved in the Company's products.

4. 申诉接受

4.Complaints Acceptance

市场部负责主导本渠道收到的申诉以及相关的处理。

Marketing Department is responsible for taking ownership of the complaints received by the channel and the related processing.

5. 申诉审查

5.Complaints Review

所有的申诉必须具有事实依据和真实内容，不得以虚假内容作为申诉的依据，且不得恶意诽谤及攻击。

All complaints must be factual and truthful and must not be based on falsehoods and must not be maliciously defamatory or offensive.

可接收满足以下条件的申诉：

Appeals may be received that meet the following conditions:

(1) 涉及公司《白银供应链尽职调查政策》中的风险。

(1) Relating to the risks in the Company's *Silver Supply Chain Due Diligence Policy*.

(2) 涉及公司尽责管理体系的缺陷、不一致或不足。

(2) Defects, inconsistencies or deficiencies involving the company's due diligence management system.

(3) 包括足够的客观证据以合理地支持提交申诉方的指控。

(3) Including sufficient objective evidence to reasonably support the allegations made by the submitting party.

(4) 本着诚信的原则提交。

(4) Submitted in good faith.

不接收以下申诉：

The following appeals will not be accepted:

(1) 与公司矿产供应链尽责管理不相关；

(1) Not relevant to the company's mineral supply chain due diligence management;

(2) 缺少足够的合理支持申诉的客观证据；

(2) Lack of sufficient objective evidence that reasonably supports the claim;

(3) 未本着诚信原则提交。

(3) Failure to submit in good faith.

6. 申诉处理

6.Complaints Handling

(1) 收到申诉后，市场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 a complaint, Marketing Department investigates the content of the received complaint within five working days and makes a decision to reject or to receive the complaint.

(2) 经调查属实的申诉，市场部在十五个工作日内确定处理办法，必要时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) For complaints that are substantiated after investigation, Marketing Department determines the handling method within 15 working days, communicates with stakeholders if necessary, and

determines corrective measures and carries out rectification. If the conditions of the complaint are met but the problem of the complaint does not exist or the problem has been solved, no corrective or improvement measures are required.

(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) The complainant shall be informed of the results of the investigation of the complaint, the method of handling, the corrective measures and the outcome of the complaint within 5 working days after the completion of the processing of the complaint (the manner of notification of the outcome shall be in accordance with the principle of the protection of the complainant).

(4) 信息保护：对于公司收到的所有申诉信息，由市场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 complaint information received, the head of Marketing Department specializes in keeping the relevant information, and is prohibited from disclosing it to people outside the department without the consent of the head of the marketing 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的，公司将酌情予以追究或移交司法机关处理。

(5) Complainant Protection: The Company will follow the principles of facts, procedures, confidentiality, and timeliness in handling complaints, protect the legitimate rights and interests of the complainant, maintain strict confidentiality of the complainant's information, and undertake not to take any form of retaliation against the complainant because of the act of filing a complaint, and for failure to comply with the principle of confidentiality leading to the damage of the complainant's interests, the Company will penalize the complainant as appropriate or transfer it to the judiciary to deal with it.

第四章 识别和评估供应链的风险

4. IDENTIFYING AND ASSESSING SUPPLY CHAIN RISKS

第九条 供应链尽职调查遵循基于风险评估的方法进行，包括绘制供应链地图以有效识别和评估风险。公司与白银供应对手方建立新的业务关系之前及在保持关系期间，必须进行尽职调查。

Article 9 Supply chain due diligence is conducted following a risk-based assessment methodology, including mapping of the supply chain to effectively identify and assess risks. Due diligence must be conducted before a company enters into a new business relationship with a silver supply counterparty and during the maintenance of the relationship.

第十条 供应链尽职调查

Article 10 Supply Chain Due Diligence

供应链尽职调查应从评估所采购的含银材料的位置、供应链、含银材料类型三个方面的风险。

Supply chain due diligence should be performed to assess risk in terms of the location of the silver-containing material being sourced, the supply chain, and the type of silver-containing material.

一、位置风险识别应包括但不限于：

I. Location risk identification shall include but not be limited to:

1. 确定白银的来源，并及时记录来源类别：矿物银、回收银、采矿副产品和官方库存。

1. To identify the sources of silver and record in a timely manner the source categories: mineral silver, recycled silver, mining by-products and official stocks.

2. 确定白银来源及从产地到精炼厂的一般运输路线，以及参考制裁名单(联合国及相关制裁名单等)、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文件、金融行动工作组 (FATF) 报告 (包括相关国家/地区报告)、高风险白银中心/转运中心和洗钱风险高的国家/地区等的可靠市场情报。

2. To identify silver sources and general transportation routes from origin to refineries, as well as references to sanctions lists (UN and related sanctions lists, etc.), EU CAHRA lists, the Heidelberg Barometer, Fragile States Index or similar, documents of the Office of the United Nations High Commissioner for Human Rights (OHCHR) or equivalents, Financial Action Task Force (FATF) reports (including relevant country/territory reports), high-risk silver centers/transit centers and reliable market intelligence on countries/regions with high money laundering risk.

3. 核实矿山并非位于世界遗产地和/或精炼商提供官方证明已获得允许在特定世界遗产地从 ASM 开采白银。

3. To verify that the mine is not located on a World Heritage Site and/or that the refiner provides official proof that permission has been granted to mine silver from ASM on a specific World Heritage Site.

二、供应商风险识别

II. Supplier Risk Identification

使用了解您的供应商（KYS）调查表用于风险识别，包括但不限于：

The Company use the Know Your Supplier (KYS) questionnaire for risk identification, including but not limited to

1. 利用可靠的、独立来源的文件、数据或信息，识别和验证白银供应对手方的名称、实际地址、公司注册和许可证信息。

1. To identify and verify the name, physical address, company registration, and license information of silver supplying counterparties using documents, data or information from reliable, independent sources.

2. 识别和确认白银供应交易对手方及其 UBO 且未被列入任何政府通缉的洗钱者名单或已知的诈骗犯或恐怖分子名单。

2. To identify and confirm that the silver supply counterparty and its UBO are not on any government's list of wanted money launderers or known fraudsters or terrorists.

3. 了解白银供应对手方的业务和财务详情便于预测业务关系。

3. To understanding the business and financial details of silver supply counterparties facilitates the forecasting of business relationships.

三、材料类型风险

III. Risk of Material Type

1.来自 LSM 开采银的风险识别应包括但不限于：白银供应对手方的白银进出口许可证(如适用)、采矿作业（包括加工和运输方法）、生产数据及加工能力（如可用）、第三方库存的来源及管控措施、反洗钱和恐怖主义融资政策和实践（若相关）、贿赂和腐败政策和实践（包括向政府付款）、人权政策和实践、环境政策和实践、健康和安全管理政策和实践、劳动政策和实践（若未通过其他政策涵盖）、社区参与计划、道德及商业诚信政策和实践。

1. Identification of risks from LSM's mining of silver should include, but not be limited to silver import and export licenses of silver supplying counterparties (if applicable), mining operations (including processing and transportation methods), production data and processing capacity (if available), sources of third-party stockpiles and controls, anti-money laundering and terrorist financing policies and practices (if relevant), bribery and corruption policies and practices (including payments to governments) , human rights policies and practices, environmental policies and practices, health and safety policies and practices, labor policies and practices (if not covered by other policies), community involvement programs, ethics and business integrity policies and practices.

2.来自 ASM 开采银的风险识别应包括但不限于：

2. Risk identification from ASM mined silver shall include but not be limited to

(1) ASM 白银来源的供应商，包括 a.当地的手工采矿队、协

会或合作社（不需要确认个别挖掘者），b.矿石加工厂，c.汇集商及交易商，d.当地白银出口商；

(1) Suppliers of ASM silver sources, including a. local artisanal mining fleets, associations or cooperatives (identification of individual diggers is not required), b. ore processors, c. aggregators and dealers, and d. local silver exporters.

(2) 采矿项目是否可以被认为是合法的 ASM（即合法注册、基于合作/政府认可/中央银行支持的倡议）；

(2) Whether a mining project can be considered a legitimate ASM.

(3) 采矿作业（包括提取、加工和运输方法）；

(3) Mining operations (including extraction, processing and transportation methods).

(4) 汞的使用、储存和回收，以及(如适用)对环境和参与白银生产、处理和加工的人员的健康的影响；

(4) The use, storage, and recycling of mercury and, if applicable, the effects on the environment and on the health of persons involved in the production, handling and processing of silver,

(5) 人权实践和政策（若可用）、环境实践和政策（若可用）、健康和安全实践和政策（若可用）、劳动实践和政策（若可用）、社区参与实践和政策（若可用）、有关对政府付款的实践和政策（若可用）。

(5) Human rights practices and policies (if available), environmental practices and policies (if available), health and safety practices and policies (if available), labor practices and policies (if available), community involvement practices and policies (if available),

and practices and policies regarding payments to government (if available).

3.再生银的风险识别应包括但不限于：

3. Risk identification for recycled silver shall include but not be limited to

(1) 白银供应对手方的主要市场、产品和客户细分、白银和贵金属供应商的资料、采购贵金属的种类和形式、经营的设施类型及地点(精炼、制造、珠宝生产、当铺等)；

(1) The main markets, products and customer segments of the silver supplying counterparty, information on silver and precious metal suppliers, the types and forms of precious metals purchased, and the types and locations of facilities operated (refining, manufacturing, jewelry production, pawnshops, etc.).

(2) 由该设施加工的白银和贵金属的原产地；

(2) The origin of silver and precious metals processed by the facility.

(3) 进口/出口许可证（如适用）、反洗钱和恐怖主义融资政策和实践、反贿赂与反腐败政策和实践、负责任采购政策和实践。

(3) Import/export licenses (if applicable), anti-money-laundering and terrorist financing policies and practices, anti-bribery and anti-corruption policies and practices, responsible procurement policies and practices.

四、交易监控

IV. Transactions Monitoring

公司在与白银供应对手方合作期间采用基于风险的方法对交易

进行适当的审查和监控，以确保了解供应链和风险状况。

The Company utilizes a risk-based approach to appropriately review and monitor transactions during its engagement with silver supply counterparties to ensure an understanding of the supply chain and risk profile.

1. 交易监控应包括但不限于：

1. Transaction monitoring shall include but not be limited to

(1) 检查含银材料的数量、类型和品位是否与前一批货物一致；

(1) To checking that the quantity, type and grade of silver-containing materials are consistent with the previous shipment.

(2) 监控每批货物的实际运输路线；

(2) To monitoring the actual transportation route of each shipment.

(3) 核对装船/运输单据(检验、重量、序列号)；

(3) To verification of shipping/transportation documents (inspection, weight, serial number).

(4) 确认文件资料(采购订单、收货、发票)与 KYS 信息(矿山容量、产地、来源)一致。

(4) Verify that the documentation (purchase order, receipt, invoice) is consistent with the KYS information (mine capacity, origin, source).

2. 当发现资料不一致或有所怀疑时采取以下措施：

2. Take the following measures when information is found to be inconsistent or in doubt:

(1) 应将相关白银隔离保存(直至不一致的问题解决)；

(1) Relevant silver should be kept in isolation (until the inconsistency is resolved);

(2) 应进行调查并记录在案；

(2) An investigation shall be conducted and documented;

(3) 调查结果应报告合规专员、合规委员会及监察审计部。

(3) The results of the investigation shall be reported to the Compliance Officer, the Compliance Committee and the Monitoring and Audit Department.

第十一条 供应链分类

Article 11 Classification of Supply Chains

根据尽职调查中确定的风险状况，供应链分为零容忍供应链、高风险供应链、低风险供应链。

According to the risk status identified in the due diligence investigation, the Company supply chain is categorized into zero tolerance supply chain, high risk supply chain and low risk supply chain.

一、零容忍供应链评估标准

I. Zero-Tolerance Supply Chain Assessment Criteria

一旦发现零容忍问题，公司不得与白银供应对手方建立业务关系或立即终止现有关系，并通知 LBMA。

Once a zero tolerance issue is identified, the Company shall not establish a business relationship with a silver supply counterparty or immediately terminate the existing relationship and notify the LBMA.

1. 零容忍供应链评估标准包括但不限于：

1. Zero tolerance supply chain assessment criteria include but are not limited to

(1) 开采银来自被指定为世界遗产地的地区并且未被提供明确授权；

(1) Mining silver is sourced from areas designated as World Heritage Sites and has not been provided with explicit authorization.

(2) 以违反国际制裁的方式采购开采银或再生银；

(2) Mining or recycled silver is procured in a manner that violates international sanctions.

(3) 开采银或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) The counterparty supplying the mined or recycled silver, other known upstream companies or their UBOs are known money launderers, fraudsters or terrorists, or have a history of serious human rights abuses, or directly or indirectly support illegal non-state armed organizations.

二、高风险供应链评估标准

II. High-Risk Supply Chain Assessment Criteria

当公司在尽职调查管理的过程中识别出高风险供应链时，公司应进行加强型尽职调查（EDD）。

The Company shall conduct Enhanced Due Diligence (EDD) when it identifies a high risk supply chain as part of its due diligence management process.

1. 开采银或作为采矿副产品的白银的高风险问题应包括但不限于：

1. High-risk issues for mining silver or silver as a by-product of mining shall include but are not limited to

(1) 位置高风险：开采银或作为采矿副产品的白银来自 CAHRA 或曾在该等地区过境或通过该等地区运输、据称来自已知或合理怀

疑来自 CAHRA 的白银过境的国家/地区、据称来自已知储量、可能资源或预期产量有限的国家/地区。

(1) Location High Risk: Silver mined or shipped as a by-product of mining originates from, or transited/transported through CAHRA, is alleged to have originated from countries where silver is known or reasonably suspected to have originated from the transit of silver through CAHRA, and is alleged to have originated from countries with limited known reserves, probable resources, or expected production.

(2) 供应商高风险：白银供应对手方或其他已知的上游公司具有符合基于位置高风险标准的股东或 UBO 或其他白银供应权益、具有身为 PEP 的 UBO、从事高风险商业活动（如军火、赌博和娱乐业、古董和艺术、教派及其领袖）、已知在过去 12 个月曾从高风险国家/地区采购白银、提供的文件有重大差异/不一致或拒绝提供所要求的文件。

(2) Supplier High Risk: Silver supplying counterparty or other known upstream company has shareholders or UBOs or other silver supplying interests that meet location-based high risk criteria, has UBOs that are PEPs, is engaged in high risk business activities (e.g., arms, gaming and entertainment industries, antiques and art, denominations and their leaders), is known to have purchased silver in the past 12 months from a high risk country/region, has provided significant discrepancies/inconsistencies or refuses to provide requested documentation.

(3) 材料类型高风险：开采银或作为采矿副产品的白银采购自 ASM、使用汞生产、在没有适当的缓解措施的情况下造成灾难性伤

害或高度不利 ESG 因素。

(3) Material Type High Risk: Silver mined or sourced as a by-product of mining from ASM, produced using mercury, causing catastrophic injury without appropriate mitigation, or highly adverse ESG factors.

2.再生银的高风险问题应包括但不限于：

2. High risk issues for recycled silver shall include but not be limited to

(1) 位置高风险：再生银来自 CAHRA 或曾在该 CAHRA 过境或通过该 CAHRA 运输、据称来自已知或合理怀疑来自 CAHRA 的白银过境的国家/地区及/或据称来自白银出口量有限的国家/地区。

(1) Location-based High Risk: Recycled silver originating from, or transited/transported through CAHRA, allegedly originating from countries/areas known or reasonably suspected to be transiting silver from CAHRA and/or allegedly originating from countries/areas with limited silver exports.

(2) 供应商高风险：白银供应对手方或其他已知的上游公司在具有高洗钱风险的国家/地区运营、具有符合基于位置高风险标准的股东或 UBO 或其他白银供应权益、具有身为 PEP 的 UBO、从事高风险商业活动（如军火、赌博和娱乐业、古董和艺术、教派及其领袖）、已知在过去 12 个月曾从高风险国家/地区采购白银、与供应链中的供应商或对手方之间有重要且无法解释的运输路线。

(2) Supplier High Risk: Silver supplying counterparty or other known upstream company operating in a country/region with a high money laundering risk, has a shareholder or UBO or other silver

supplying interest that meets the location-based high risk criteria, has a UBO that is a PEP, is engaged in high-risk business activities (e.g., arms, gambling and entertainment industries, antiques and art, sects and their leaders), is known to have in the past 12 months have sourced silver from high-risk countries/regions, have significant and unexplained transportation routes with suppliers or counterparties in the supply chain.

(3) 材料类型高风险：再生银来自具有高风险供应链的中间精炼厂或交易商（根据经合组织尽职调查指南）或来自具有高风险供应链的中间精炼厂采购的交易对手方（根据经合组织尽职调查指南）。

(3) Material type high risk: recycled silver sourced from intermediate refineries or traders with high risk supply chains (as per OECD Due Diligence Guidance) or from counterparties sourced from intermediate refineries with high risk supply chains (as per OECD Due Diligence Guidance).

三、低风险供应链评估标准

III. Assessment Criteria for Low-Risk Supply Chains

不符合零容忍供应链、高风险供应链的供应链为低风险供应链。

Supply chains that do not comply with zero tolerance supply chains and high-risk supply chains are low-risk supply chains.

第十二条 加强型尽职调查管理

Article 12 Enhanced Due Diligence Management

当公司在尽职调查的过程中识别出高风险供应链时，公司应按白银指南要求进行加强型尽职调查管理，尽职调查措施内容包括但

不限于：

When the Company identifies a high-risk supply chain during the due diligence process, the Company shall conduct enhanced due diligence management as required by *the Guide*, with due diligence measures including, but not limited to

(1) 核实 KYS 记录信息的真实性；

(1) To verify the authenticity of the information recorded by KYS.

(2) 重点调查威胁融资风险以及具体的供应链尽职调查结果；

(2) To focus on threatened financing risks and specific supply chain due diligence findings.

(3) 由与供应商没有任何利益冲突且具备相应能力人员或独立的第三方顾问进行。进行实地考察的人员必须如实、准确地报告实地考察情况及结果；

(3) To be carried out by persons without any conflict of interest with the supplier and with the appropriate competence, or by independent third-party consultants. The person conducting the site visit must report truthfully and accurately on the site visit and its results.

(4) 在适用的情况下，咨询相关的内部和外部利益相关方；

(4) Where applicable, to consult relevant internal and external stakeholders.

(5) 实地调查/考察后应根据精炼商工具包中的实地考察报告模板形成实地考察报告；

(5) The field investigation/visit shall be followed by a field visit report based on the field visit report template in the Refiner's Toolkit.

(6) 根据调查/考察发现问题的数量和严重程度予以跟进，并

记录在改进计划中。

(6) To follow up on the number and severity of issues identified during the field survey/visit and document them in an improvement plan.

一、根据材料类型，实地调查/考察或远程在线调查/考察时应进行加强尽职调查措施，并包括以下程序：

I. Depending on the type of material, Enhanced Due Diligence (EDD) measures shall be conducted at the time of the on-site investigation/visit or remote online investigation/visit and include the following procedures

1.高风险 LSM 白银供应链的 EDD 措施应包括但不限于：

1.EDD measures for high-risk LSM silver supply chains shall include but not be limited to

(1) 对从矿山到精炼厂的基于冲突地点的高风险供应链中的每一家公司（包括白银生产商、中间商、白银交易商和出口商以及运输商）按比例开展 KYS 活动；

(1) Conducting KYS activities on a pro rata basis for each company (including silver producers, intermediaries, silver traders and exporters, and transporters) in the high-risk, conflict-site based supply chain from the mine to the refinery;

(2) 了解在矿区和供应链中提供的公共或私人安保服务的性质；

(2) Understanding the nature of public or private security services provided at the mine site and in the supply chain;

(3) 评估矿区和运输路线军事化以及为非法非国家武装组织或

公共或私人安全部队提供直接或间接支持的风险；

(3) Assessing the risk of militarization of mining sites and transportation routes and the provision of direct or indirect support to illegal non-state armed groups or public or private security forces;

(4) 审查确定任何一方在矿区、运输路线和白银交易及/或出口环节犯下任何严重侵犯人权行为的风险；

(4) Examining and determining the risk of any serious human rights violations committed by either party at the mine site, along transportation routes and in the silver trade and/or export chain;

(5) 根据生产者特许权估计手工和小规模采矿业者(如有)人数, 并: a、确认其合法 ASM 身份; b、评估第三方来源的白银在不知情的情况下被引入生产商运营过程的风险; c、确认生产者和 ASM 参与者之间的关系, 以识别冲突或紧张的实例;

(5) Estimating the number of ASM operators, if any, based on producer concessions and: a. Confirming their legal ASM status; b. Assessing the risk that silver from third-party sources is unknowingly introduced into the producer's operating process; and c. Confirming the relationship between the producer and the ASM participant to identify instances of conflict or tension;

(6) 在适用的情况下, 完成税务和使用费合规的自我声明;

(6) Where applicable, completing a self-declaration of tax and royalty compliance;

(7) 评估从提取开始在供应链的所有点对政府机构和官员、公共或私人安全部队或其他武装组织作出的支付或补偿, 除非法律禁止;

(7) Assessing payments or compensation made to government agencies and officials, public or private security forces, or other armed organizations at all points in the supply chain from extraction, unless prohibited by law;

(8) 评估对环境、健康、安全、劳工、社区、商业综合法规、政策和良好做法的遵守情况。

(8) Assessing compliance with environmental, health, safety, labor, community, and business integration regulations, policies, and good practices.

2. 高风险 ASM 白银供应链的 EDD 措施应包括但不限于：

2. EDD measures for high-risk ASM silver supply chains should include but are not limited to

(1) 对从矿石加工厂或白银汇集商到精炼商的基于地点的高风险供应链中的每一家公司（包括合作社、白银交易商和出口商以及运输商）按比例开展 KYS 活动；

(1) Conducting KYS activities on a pro rata basis for each company (including cooperatives, silver traders and exporters, and transporters) in the location-based, high-risk supply chain from the ore processor or silver aggregator to the refiner.

(2) 收集关于 ASM 供应商的政府、政治或军事联系的信息；

(2) Gathering information on the governmental, political, or military connections of ASM suppliers.

(3) 收集有关任何一方在矿区、运输路线和白银交易及/或出口环节犯下任何严重侵犯人权行为的证据；

(3) Gathering evidence of any serious human rights violations

committed by any party at the mine site, along transportation routes, and in the silver trading and/or export chain.

(4) 评估矿区和运输路线军事化以及为非法非国家武装组织或公共或私人安全部队提供直接或间接支持的风险；

(4) Assessing the risk of militarization of mines and transportation routes and the provision of direct or indirect support to illegal non-state armed groups or public or private security forces.

(5) 评估 LSM 和 ASM 之间的任何冲突或紧张关系；

(5) Assessing any conflicts or tensions between LSM and ASM.

(6) 评估有关来自其他来源的白银在不知情的情况下被引入白银供应链及/或虚假陈述的风险、怀疑或报告；

(6) Assess the risk, suspicion, or reports of silver from other sources being unknowingly introduced into the silver supply chain and/or misrepresented.

(7) 评估汞的储存、处理和使用以及对环境和工人健康的影响；

(7) Assessing the storage, handling and use of mercury and the impact on the environment and worker health.

(8) 评估与最初尽职调查中确定的问题相关的其他 ESG 风险管理实践的适当性；

(8) Assessing the appropriateness of other ESG risk management practices related to the issues identified in the initial due diligence.

(9) 评估从提取开始在供应链的所有点对政府机构和官员、公共或私人安全部队或其他武装组织作出的支付或补偿，除非法律禁止。

(9) Assessing payments or compensation made to government

agencies and officials, public or private security forces, or other armed organizations at all points in the supply chain from extraction, unless prohibited by law.

3.来自中间精炼商的高风险再生银的 EDD 措施应包括但不限于:

3. EDD measures for high-risk recycled silver from intermediate refiners should include but are not limited to

(1) 在确保合规及加以解释的基础上获取关于中间精炼商的责任采购实践的独立鉴证报告。鉴证应: a.包括对遵循经合组织负责任采购计划的评估; b.由中间精炼商在新的业务关系开始之前委托开展并完成;

(1) Obtaining an independent assurance report on the intermediate refiner's responsible sourcing practices based on ensuring compliance and explanation. The assurance shall: a. include an assessment of compliance with the OECD Responsible Sourcing Program; and b. be commissioned and completed by the Intermediate Refiner prior to the commencement of the new business relationship.

(2) 确认中间精炼商 UBO 的身份;

(2) Confirming the identity of the intermediate refiner's UBO.

(3) 间接(如通过贸易公司)从中间精炼商采购白银的精炼商应: a.尽其最大努力识别中间精炼商,并审查尽职调查,以检查中间精炼商的供应链中是否已经或应已合理发现危险信号; b.若根据《OECD 尽职调查指南》发现高风险,公司应根据经合组织的负责任采购计划对中间精炼商的尽职调查流程进行审核; c.若中间精炼商的尽职调查实践未经审核,或通过审核确定任何高风险不符合项,

则应进行风险管理策略；d.如果没有发现高风险，则无需对该材料进行额外的尽职调查；e.若无法识别中间精炼商，则应进行风险管理程序。

(3) Refiners that purchase silver indirectly (e.g., through a trading company) from an intermediate refiner shall

a. Use their best efforts to identify the intermediate refiner and review due diligence to check whether red flags have been, or should have been, reasonably identified in the intermediate refiner's supply chain.

b. If a high level of risk is identified in accordance with *the OECD Due Diligence Guidance*, the Company shall conduct a review under the OECD's Responsible Sourcing Program of the intermediate refiner's due diligence process.

c. If the intermediate refiner's due diligence practices have not been audited, or if any high-risk nonconformities are identified through the audit, a risk management strategy should be conducted.

d. If no high-risks have been identified, no additional due diligence is required for the material.

e. If the intermediate refiner cannot be identified, a risk management process should be conducted.

4.来自其他来源的高风险再生银的 EDD 措施应包括但不限于：

4. EDD measures for high-risk recycled silver from other sources should include but are not limited to

(1) 核查位于再生银的高风险地点且参与白银供应对手方至精炼厂之间供应链的每一家公司（包括运输商）的政府观察名单信息；

(1) Verification of government watch list information for each company (including transporters) that is located in a high-risk location for recycled silver and is involved in the supply chain between the silver supply counterparty and the refinery.

(2) 采访选定的管理人员和现场人员，以确定和确证供应链尽职调查实践、采购、反洗钱和反恐怖主义融资程序；

(2) Interviewing selected management and field personnel to identify and corroborate supply chain due diligence practices, procurement, anti-money laundering, and counter-terrorist financing procedures.

(3) 评估白银供应对手方对供应链尽职调查的能力是否与风险成比例；

(3) Assessing whether the silver supply counterparty's ability to conduct supply chain due diligence is proportional to risk.

(4) 评估白银供应对手方的风险分类方法的适当性；

(4) Assess the appropriateness of the silver supply counterparty's risk categorization methodology.

(5) 在符合商业信息保密的基础上评估白银供应对手方的尽职调查记录，以确认白银供应对手方是按照其供应链尽职调查政策开展尽职调查管理工作；

(5) Evaluate, consistent with the confidentiality of business information, the silver supplying counterparty's due diligence record to confirm that the silver supplying counterparty conducts its due diligence management efforts in accordance with its supply chain due diligence policy.

(6) 在符合商业信息保密的基础上评估白银供应对手方高风险供应链的实地考察方法。

(6) Consistent with the confidentiality of business information, Evaluating the silver supplying counterparty's fieldwork methodology for high-risk supply chains.

第五章 针对已识别的风险制定并实施风险管理策略

5. DEVELOPING AND IMPLEMENTING RISK MANAGEMENT STRATEGIES FOR IDENTIFIED RISKS

第十三条 风险管理策略

Article 13 Risk Management Strategy

公司对供应链中识别出的风险进行管理，由市场部和物流采购部门负责制定并实施风险管理策略，确保白银供应链的负责任采购。公司对所识别的风险采取的风险管理策略如下：

The Company manages the risks identified in the supply chain, and Marketing Department and the logistics and procurement related department are responsible for formulating and implementing risk management strategies to ensure responsible procurement in the silver supply chain. The risk management strategies adopted by the Company for the identified risks are as follows:

一、终止关系

I. Relationships Termination

当在加强的尽职调查中发现供应商有洗钱、恐怖主义融资、严重侵犯人权、直接或间接支持非国家武装组织、谎报矿物产地的证据时，公司将立即终止与供应商的合作，并根据国内和国际法律要求，向相关主管机构和 LBMA 报告。

When evidence of money laundering, terrorist financing, serious human rights violations, direct or indirect support to non-state armed organizations, or misrepresentation of the origin of minerals is found by a supplier in the course of enhanced due diligence, the Company will immediately terminate its cooperation with the supplier and report it to the relevant authorities and the LBMA in accordance with the requirements of domestic and international laws.

二、暂停关系

II. Relationship Suspension

当在加强的尽职调查中发现供应商存在洗钱、恐怖主义融资、严重侵犯人权、直接或间接支持非国家武装组织、谎报矿物产地情况的合理怀疑或者存在灾难性 ESG 影响时，公司应暂停与供应商的合作。当公司从供应商处获得反驳上述情况初步怀疑的额外信息/数据或针对 ESG 影响的及时和适当的回应时，经公司合规委员会审批后恢复与供应商的合作。

The Company shall suspend its cooperation with the supplier when reasonable suspicion of money laundering, terrorist financing, serious human rights violations, direct or indirect support to non-state armed organizations, misrepresentation of mineral origin, or catastrophic ESG impacts are identified in the enhanced due diligence of the Supplier. When the Company obtains additional information/data from the supplier to refute the initial suspicion of the above circumstances or a timely and appropriate response to address the ESG impacts, cooperation with the supplier is resumed upon approval by the Company's Compliance Committee.

三、维持关系，但须执行改进计划

III. Relationship Maintain(Improvement needed)

1. 当在加强的尽职调查结果不完全令人满意，或认为虽然存在（1）贿赂，（2）非欺诈性误报矿物产地，（3）未支付应付政府的税收、费用和特许权使用费，（4）严重违反与环境、健康、安全、劳工和社区有关的地方立法，及/或存在极有可能造成高度不利影响的 ESG 风险的情况，但白银供应对手方已作出合理和尽责管理的努力，公司可与白银供应对手方继续合作。但白银供应对手方应执行经公司合规委员会审批的改进计划。改进计划的内容包括但不限于：（1）需要管控的风险，（2）风险管理的目标和影响，（3）定量及/或定性的绩效评估指标，（4）可以衡量的风险缓解措施，（5）明确的风险缓解进展时间表和必要的资源，（6）监测和跟踪改进计划的执行和完成情况；在实施改进计划的过程中，如果发现风险出现重大变化则需向合规委员会汇报，并确认是否需要调整改进计划；（7）对改进计划执行的有效性的评估，至少每 6 个月评估一次，（8）实施改进计划后，当现实情况或者供应链出现变化后对需要缓解的风险进行监测以及补充评估。

1. when the results of an enhanced due diligence investigation are not fully satisfactory, or when it is believed that while there has been (1) bribery, (2) non-fraudulent misrepresentation of the origin of minerals, (3) non-payment of taxes, fees and royalties payable to the government, (4) serious breaches of local legislation relating to the environment, health, safety, labor, and the community, and/or the existence of an ESG risk that is highly probable to result in a high degree of adverse impact, the the silver supply sounterparty has made reasonable and due diligence management efforts, the Company may continue to work with the silver supply counterparty. However, the silver supply counterparty shall

implement an improvement plan approved by the Company's Compliance Committee. The content of the improvement plan includes but is not limited to (1) risks to be managed and controlled, (2) risk management objectives and impacts, (3) quantitative and/or qualitative performance assessment metrics, (4) measurable risk mitigation measures, (5) a clear timetable for progress in mitigating the risks and the necessary resources, and (6) monitoring and tracking of the implementation and completion of the improvement plan; and in the course of the implementation of the improvement plan, if a During the implementation of the improvement plan, if significant changes in risks are found, the Compliance Committee will be required to report to the Compliance Committee and confirm whether the improvement plan needs to be adjusted; (7) Evaluation of the effectiveness of the implementation of the improvement plan, at least once every six months; (8) After the implementation of the improvement plan, when the reality or supply chain changes, the risks to be mitigated will be monitored and supplemented with additional assessments.

第十四条 监控改进计划

Article 14 Monitoring and Improvement Plan

1. 合规专员应定期向合规委员会报告改进计划执行情况。

1. The Compliance Specialist shall periodically report to the Compliance Committee on the implementation of the Improvement Program.

2. 风险监控策略应确定从采用改进计划开始起六个月内消除风险的重要和可衡量的改进，然后根据在前六个月内所取得的进展，在经修订的改善计划中界定额外措施。市场部、物流采购部门应根

据实际情况通过独立审计、后续实地考察或远程审查等方式开展正式风险管理绩效评估以确定在改进期限前是否已采取适当的措施。

2. The risk monitoring strategy shall identify significant and measurable improvements to eliminate risks within six months from the start of the adoption of the improvement plan, and then define additional measures in the revised improvement plan based on the progress made during the previous six months. Marketing Department, logistics and procurement related departments shall conduct a formal risk management performance assessment through independent audits, follow-up site visits or remote reviews, as appropriate, to determine whether appropriate measures have been taken by the improvement deadline.

3.为促进开展监控改进活动，市场部和物流采购部门需酌情和受影响的利益相关方进行沟通，就改进计划中可衡量的风险缓解策略达成一致意见，与利益相关方合作共同推动改进计划的实施，并监测和追踪缓解措施的绩效。改进计划的实施、监督和绩效跟踪等措施与受影响的利益相关方、当地和中央政府、上游企业、国际或民间社会组织开展合作和/或协商，并保留相关记录。

3. In order to facilitate the implementation of monitoring and improvement activities, Marketing Department, logistics and procurement related departments need to communicate with affected stakeholders as appropriate, agree on measurable risk mitigation strategies in the improvement plan, collaborate with stakeholders to jointly promote the implementation of the improvement plan, and monitor and track the performance of the mitigation measures. Measures such as implementation, monitoring and performance tracking of the

improvement plan are carried out in cooperation and/or consultation with affected stakeholders, local and central governments, upstream businesses, and international or civil society organizations, and relevant records are kept.

4. 在风险管理改进实施六个月后，当可衡量的改进有限或并无可衡量的改进时，公司应暂停与供应商的合作，直至供应商就改进计划作出回应。当减轻风险及改进失败时，公司应终止与供应商的合作。

4. After six months of risk management improvement implementation, when measurable improvement is limited or not measurable, the Company will suspend cooperation with the supplier until the supplier responds to the improvement plan. When risk mitigation and improvement fails, the Company will terminate the relationship with the supplier.

5. 合规委员会每年至少进行一次根据风险缓解策略重新评估审议是否与供应商维持业务关系。

5. At least once a year, the Compliance Committee re-evaluates whether to consider maintaining business relationships with suppliers based on risk mitigation strategies.

第十五条 内部报告

Article 15 Internal Reporting

合规委员会保留对白银供应链的最终控制权和责任。对于公司尽职调查管理中所识别到的供应链中确定的实际和潜在风险以及建议的风险管理策略合规专员必须汇报给合规委员会，报告的频率为每年至少一次，内容包括但不限于：

The Compliance Committee retains ultimate control and

responsibility for the silver supply chain. For actual and potential risks identified in the supply chain and recommended risk management strategies identified in the Company's due diligence management the Compliance Specialist must report to the Compliance Committee at a frequency of at least once per year, including but not limited to

1. 有关高风险供应链的相关统计数据；
1. Relevant statistical data on high-risk supply chains.
2. 风险减轻策略下的白银供应对手方及风险减轻策略的状况；
2. The silver supply counterparties under the risk mitigation strategy and the status of the risk mitigation strategy.
3. 有关改进计划的进展及有效性的报告。
3. Reports on the progress and effectiveness of improvement programs.

第六章 白银供应链尽职调查的审查和合规性评价

6. SILVER SUPPLY CHAIN DUE DILIGENCE REVIEW AND COMPLIANCE EVALUATION

第十六条 合规小组每年组织对供应链风险管理进行审查，评价适宜性和有效性。公司根据审查结果编制白银供应链尽职调查合规报告，披露 LBMA 白银供应链尽职调查的实践情况，由市场部负责编写公司的白银供应链尽职调查合规报告，在尊重其他供应链参与者的安全、机密信息和合法权利的基础上，公司需于每年第一季度结束前披露一次并将该报告公布在公司的网站上。

Article 16 The Compliance Group organizes an annual review of the supply chain risk management to evaluate the appropriateness and effectiveness. Based on the results of the review, the Company prepares

a silver supply chain due diligence compliance report to disclose the practice of LBMA's silver supply chain due diligence. Marketing Department is responsible for the preparation of the Company's silver supply chain due diligence compliance report, which is required to be disclosed once a year before the end of the first quarter of each year and published on the Company's website, while respecting the security, confidential information and legal rights of other supply chain participants.

白银供应链尽职调查合规报告根据《LBMA 负责的白银指南》要求，采纳受冲突影响以及高风险地区矿产品责任供应链相关的经合组织尽职调查指南内规定的基于风险的尽职调查五步框架编制合规报告，包括但不限于以下信息：

The Silver Supply Chain Due Diligence Compliance Report adopts the five-step risk-based due diligence framework set out within *the OECD Due Diligence Guidance* related to responsible supply chains of minerals from conflict-affected and high-risk areas to prepare a compliance report in accordance with the requirements of *the LBMA Guidance on Responsible Silver*, including but not limited to the following information:

1. 公司简介，报告时间范围；
1. Company profile and reporting time.
2. 披露年度内为符合负责任白银指南及达到计划目标而进行的活动概况；
2. A summary of the activities undertaken during the year to comply with the Responsible Silver Guidelines and to meet the objectives of the program.

3.披露年度内公司对负责任白银指南五步框架中每一步的遵循情况；

3. Disclosure of the company's adherence to each of steps 1 through 5 of the five-step framework of the Responsible Silver Guidelines during the year.

4.披露年度内管理层就是否符合负责任白银指南的规定及计划的目标作出的整体结论；

4. Disclosure of management's overall conclusions during the year regarding compliance with the provisions of the Responsible Silver Guidelines and the objectives of the Program.

5.披露年度内为厘清高风险运作和供应链的情况而采取的EDD、方法和实践、实地考察情况，以及确定的实际或潜在风险；

5. Disclosure of EDDs, methodologies and practices, site visits, and actual or potential risks identified during the year to clarify the profile of high-risk operations and supply chains.

6.披露年度内为加强高风险供应链的保管链或可追溯性系统而采取的措施、风险缓解策略、对业绩的监测和跟踪以及六个月后的跟进结果；

6. Disclosure of measures taken during the year to strengthen the chain of custody or traceability systems of high-risk supply chains, risk mitigation strategies, monitoring and tracking of performance, and follow-up results after six months.

7.在公司可接受范围内且符合国内法律要求下，披露年度内公司与不披露身份的供应商及/或供应链停止合作实例的数量；

7. Disclose the number of instances during the year in which the company ceased cooperation with suppliers and/or supply chains whose

identities are not disclosed, to the extent acceptable to the company and in compliance with the requirements of domestic laws.

8.其他需要披露的内容等。

8. Other required disclosures, etc.

第十七条 公司经合规委员会批准后于每年第一季度结束前组织具备开展鉴证业务所需的能力和符合LBMA要求的第三方鉴证服务机构就上一年度供应链尽职调查管理工作开展独立第三方负责任审计。

Article 17 The Company shall, upon approval by the Compliance Committee, organize a third-party assurance service provider with the necessary capability and experience to carry out the assurance business and in compliance with the requirements of the LBMA to carry out an independent third-party responsible audit on the supply chain due diligence management in the previous year before the end of the first quarter of each year.

第七章 白银供应链尽职培训及尽职调查文件记录管理

7. SILVER SUPPLY CHAIN DUE DILIGENCE DOCUMENTATION RECORDS MANAGEMENT

第十八条 公司每年对白银供应链中的所涉及员工进行该岗位规则培训，并将培训计划纳入公司年度培训计划当中。建立相应培训档案及记录等至少保存5个会计年度。

Article 18 The Company conducts annual training for the employees involved in the silver supply chain on the rules of the position, incorporates the training program into the company's annual

training plan, and establishes corresponding training files and records to be kept for at least five fiscal years..

第十九条 培训方式

Article 19 Training Methods

采用内训讲解授课或外部授课方式进行，讲师由市场部负责人组织，人力资源部配合安排。

The training shall be conducted by internal lectures or external lectures, and the lecturers shall be organized by the head of Marketing Department and arranged by the Human Resources Department.

第二十条 培训反馈

Article 20 Training Feedback

培训后，由培训讲师进行培训效果考核，考核不合格者将进行再培训直至考核合格。

After the training, the training instructor will conduct training effect assessment, and those who fail the assessment will be retrained until they pass the assessment.

第二十一条 公司要保存足够的供应链的证明文件记录，按照供应链尽职调查系统的标准来评判风险的要求，来证明充分且持续地完成了尽职调查。记录保存至少 5 个会计年度。

Article 21 The Company shall keep sufficient records of supporting documents of the supply chain to demonstrate that due diligence has been adequately and consistently completed in accordance with the requirements of the Supply Chain Due Diligence System's criteria for evaluating risks. The records shall be kept for at least five fiscal years.

第八章 附 则

8. SUPPLEMENTARY PROVISIONS

第二十二条 审批机构。

本办法由公司总经理办公会议审议通过，自发布之日起实施，原办法即行废止。

Article 22 *The Guide* are considered and adopted by the General Manager Office Meeting of the Company and shall be implemented as of the date of issuance, and the original measures shall be repealed as of the same date.

第二十三条 语言。

本制度中英双语文义不一的以中文为准。

Article 23 In case of any discrepancy between the Chinese and English versions of this system, the Chinese version shall prevail.

第二十四条 本制度最终解释权归紫金铜业有限公司。

Article 24 The final interpretation of this system shall be vested in Zijin Copper Co., Ltd.