

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

白银供应链尽职调查合规报告
**Due Diligence Compliance Report of
Silver Supply Chain
(2019 年)
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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	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
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报告负责人 Person in charge of the report	范才总经理 General Manager, Fan Cai

一、公司简介

I. Company Introduction

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

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

businesses of incoming materials processing and sales of all kinds of gold, silver jewelry and silver products at the same time.

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

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

根据 LBMA 发布的《LBMA 责任白银指南》的要求，公司应对供应商进行严格的尽职调查，以打击系统性或广泛性的侵犯人权行为，避免造成冲突，并遵

守高标准的反洗钱和打击恐怖融资行为。公司不断完善白银供应链尽职调查相关的管理政策，并对白银供应商进行了相应的尽职调查。本报告总结了截至 2019 年 12 月 31 日公司遵守 LBMA 责任白银指南的情况。

According to the requirements of the *LBMA Responsible Silver Guidance* issued by LBMA, the Company should conduct strict due diligence investigation for suppliers to combat systematic or widespread human rights violations, avoid conflicts, and comply with high standards of anti-money laundering and terrorist financing. The Company has continuously improved the management policies related to due diligence investigation on the silver supply chain and conducted corresponding due diligence investigation for silver suppliers. The Report summarizes the Company's compliance with the LBMA Responsible Silver Guidance as of December 31, 2019.

二、合规性概述

II. Summary of Compliance

公司对所有供应商进行尽职的供应链调查，要求所有供应商提供的来源合法、合规。

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

第一步：建立强有力的公司管理体系

Step 1: Establish strong company management systems

合规声明与要求：截至 2019 年 12 月 31 日止，公司已经完全遵守第 1 步的要求：建立强有力的公司管理体系，确保白银供应链尽职调查工作全面落地。

Compliance Statement and Requirement: The Company has fully complied with the requirements of Step 1: Establish strong company management systems to fully implement due diligence investigation of silver supply chain as of December 31, 2019.

1 负责任的白银尽职调查政策

1 Responsible silver due diligence policy

根据《LBMA 责任白银指南》和《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》（以下简称“经合组织尽职调查指南”）的要求，公司于 2019 年 1 月出台了《广东金业贵金属有限公司白银供应链尽职调查管理办法》，并于 2019 年 2 月在公司官网（<http://www.gdldjy.com>）发布。同时，公司发布了《广东金业贵金属有限公司白银供应链尽职调查政策声明》，承诺公司严格遵守国家关于职工权利、环境保护、公平交易等各项法律法规，积极参与白银供应链尽职调查工作，在白银生产、贸易过程中出现“大规模滥用人权”、“非政府武装团体直接或间接支持的行为”、“对个人（包括政府官员、客户、和供应商或任何其他组织）要求贿赂或者回扣”等行为采取零容忍态度。

In January 2019, the Company issued the *Measures for the Administration of Due Diligence in Silver Supply Chain of Guangdong Jinye Precious Metals Co., Ltd.* and published it on the Company's official website (<http://www.gdldjy.com>) in February 2019 as per the *LBMA Responsible Silver Guidance* and *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (hereinafter referred to as the “OECD Due Diligence Guidance”). At the same time, the Company issued the *Due Diligence Policy Statement on Silver Supply Chain of Guangdong Jinye Precious Metals Co., Ltd.*, acknowledged that the Company would strictly abide by the laws and regulations of the state on the rights of employees, environmental protection, fair trade and other laws and regulations, would actively participate in the due diligence work of the silver supply chain, and uphold principle of zero tolerance towards “large-scale abuse of human rights”, “acts directly or indirectly supported by non-governmental armed groups” and “demands for bribes or kickbacks from individuals (including government officials, customers, suppliers or any other organization)” in the process of silver production and trade.

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

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

2 尽职调查的内部管理组织机构

2 Internal management organization of due diligence

公司专门为白银供应链尽职调查成立了合规调查小组，包括公司总经理范才先生（高级管理人员）、销售部经理范锦平先生（合规总监），小组成员由销售部、财务部、技术部、生产部等指派。

The Company has set up a compliance investigation team for due diligence in the silver supply chain, including Mr. Fan Cai, General Manager of the Company (Senior Management Personnel), and Mr. Fan Jinping, Sales Manager (Compliance Director). The members of the team should be appointed by Sales Department, Finance Department, Technology Department, Production Department, etc.

2019年6月1日，合规调查小组召开会议，讨论了公司尽职调查政策及2019年6月份之前对供应商尽职调查活动开展情况，合规小组成员参加了本次会议。

On June 1, 2019, the Compliance Investigation Team held a meeting to discuss the Company's due diligence policy and the implementation of due diligence activities for suppliers before June 2019, with members of the Compliance Team participating in the meeting.

3 建立内部供应链追溯体系

3 Establish an internal supply chain traceability system

3.1 供应链追溯体系

3.1 Supply chain traceability system

所有的供应商都会被进行资信调查，资信调查通过后签订合同以及供应商社会承诺书，承诺原料合法，符合 LBMA 尽职调查政策；对供应商供应的每一批原料都进行验收，验收项目包括重量、水分、品位等，重量验收有过磅单，水分验收有水分测定原始记录，品位验收有检测报告，过磅单、水分测定原始记录由验收人员和供应商（必要时）签字确认，最终以质检报告形式发给供应商；生产过程取样化验，最后形成白银产品，打印唯一编号，通过上海黄金交易所或白银客户进行交易。

All suppliers will be subject to credit investigation. After the credit investigation is passed, suppliers shall sign contracts and letter of commitment that the raw materials are legal and conform to LBMA's due diligence policy. Each batch of raw materials supplied by the Supplier shall be checked and accepted, with acceptance items including weight, moisture, grade, etc. Weight acceptance has weighing sheet, moisture acceptance has original record of moisture determination, grade acceptance has inspection report, weighing list and original record of moisture determination shall be signed and confirmed by acceptance personnel and suppliers (when necessary), and finally sent to suppliers in the form of quality inspection report. The production process is sampled and tested, and finally silver products are formed. Samples should be taken for test in the production process until the silver products are produced with the unique number printed on and then traded through the Shanghai Gold Exchange or silver customers.

3.2 记录保存

3.2 Retention of records

公司保存供应商营业执照等资质验证资料复印件，保存供应商尽职调查表、

每一批次过磅单、水分测定原始记录、检测原始记录、检测报告、结算单等相关记录资料，并且保存 5 年以上。

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

3.3 培训

3.3 Training

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

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

3.4 合规专员

3.4 Compliance Officer

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

The Company has designated the main person in charge of the Audit and Sales Department as the Compliance Director, who is responsible for all matters related to the due diligence management of the supply chain, especially the audit of the due diligence of the supply chain, and assessing whether the due diligence is sufficient, and collecting additional documents or information when necessary to ensure that the corresponding activities are carried out in the high-risk supply chain or transaction. Take charge of staff training on responsible supply chain, preparing and updating supply chain policies, and providing senior management with appropriate information to perform their duties.

3.5 通过官方渠道付款

3.5 Payment through official channels

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

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

4 与白银供应商订约

4 Engagement with silver supplier

公司销售部原料采购科负责按照《白银供应链尽职调查管理办法》与原料供应商进行沟通。通过沟通，使其及时了解 LBMA 负责的白银供应政策，以及公司白银供应链尽职调查的政策，并告诫供应商需遵循相关政策及程序。通过充分沟通对供应商进行风险评估，避免与高风险供应商进行合作，若评估为低风险，则由合规专员签字确认，若评估为高风险，合规专员签字确认后由合规小组组长审批（迄今未发现高风险供应商）。

The Raw Material Purchasing Division of the Sales Department of the Company is responsible for communicating with raw material suppliers in accordance with the

Silver Supply Chain Due Diligence Management Measures, making them understand LBMA responsible silver supply policy and the Company's silver supply chain due diligence policy in a timely manner, and warning suppliers to follow relevant policies and procedures. Conduct risk assessment of suppliers through sufficient communication to avoid cooperation with high-risk suppliers. If the assessment is low risk, it will be signed and confirmed by the Compliance Officer. If the assessment is high risk, it will be approved by the Compliance Team Leader after the signature and confirmation of the Compliance Officer (no high-risk suppliers have been found so far).

在与供应商合作之前，原料采购科会要求所有白银原料供应商签订一份合规声明，确保供应商了解并遵守 LBMA 负责的白银供应指南，以及公司白银供应链政策及要求，降低合作风险。该声明指出，卖方提供的所有原料应符合 LBMA 白银责任指南，避免冲突区域和高风险区域开采、处理进出口金属产品、滥用人权、融资非政府武装实体、违法犯罪团伙、贿赂、欺诈、洗钱等。2019 年与我们合作的国内外所有白银原料供应商均按要求签署了合规声明。

Before cooperating with suppliers, the Raw Material Purchasing Division will require all silver raw material suppliers to sign a compliance statement to ensure that suppliers understand and comply with LBMA responsible silver supply guidance and the Company's silver supply chain policies and requirements to reduce cooperation risks. The statement pointed out that all raw materials provided by the seller should conform to LBMA Silver Responsibility Guidance to avoid mining in conflict areas and high-risk areas and handle import and export of metal products, abuse of human rights, financing of non-governmental armed entities, illegal and criminal gangs, bribery, fraud, money laundering, etc. All domestic and foreign silver raw material suppliers that cooperated with us in 2019 signed compliance statements as required.

5 建立机密申诉机制

5 Build confidential grievance mechanism

在公司尽职调查管理中，提供了白银供应链管理报告机制及渠道，凡对政策有疑问或者发现违规行为的可以通过电话、微信、电子邮箱等方式进行反馈。公司尽职调查政策、电话、微信、电子邮箱均在公司外网发布，公司员工及供应商均可以通过网络了解这些信息。

In the due diligence management of the Company, the silver supply chain management reporting mechanism and channels are provided. Anyone who has any questions about the policy or finds any violations can give feedback via telephone, WeChat, e-mail, etc. The Company's due diligence policy, telephone, WeChat and e-mail are all published on the Company's outer website, and employees and suppliers of the Company can learn this information through the Internet.

第二步：识别并评估供应链中的风险

Step 2: Identify and assess risk in the supply chain

第 2 步合规概述：截至 2019 年 12 月 31 日，公司完全遵守第 2 步：识别并评估供应链重的风险。

Step 2 summary of compliance: The Company has fully complied with Step 2: Identify and assess heavy risks in the supply chain as of December 31, 2019.

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

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

1 识别白银供应链内的风险

1 Identify risks in silver supply chain

公司白银全部来源于矿产白银，根据经合组织《来自受冲突影响和高风险地区矿石负责任供应链尽职调查指南》并扩展至环境和可持续性责任，公司识别相关风险，密切关注来自侵犯人权、武装冲突、非法开采、开采利用汞以及源于世界遗产遗址等地区的白银，以及用于贿赂、洗钱、恐怖主义融资等行为的白银。公司为每个供应商建立供应商档案，根据公司的风险状况进行了调查，在与其签订合同之前完成供应商档案的建立工作。

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

2 评估供应链风险

2 Assess supply chain risks

2.1 供应链尽职调查

2.1 Supply chain due diligence

公司通过以下措施对供应链进行尽职调查：

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

2.1.1 供应商信息收集

2.1.1 Information collection of suppliers

在与供应商合作之前，销售部负责收集相关供应商信息和资料。对于白银原材料供应商，我们均要求其提供营业执照、采矿许可证、第三方查询例如：企查查

查、中国裁判文书网等，对其合法性进行证明。销售部还对供应商进行合规性调查，分别向供应商发送问卷调查，以获取相关信息和文件，包括供应商的基本信息、业务活动、管理结构、财务细节和负责的白银供应链等。

Before cooperating with suppliers, the Sales Department is responsible for collecting relevant supplier information and data. For silver raw material suppliers, we all require them to provide business licenses, mining licenses, and third-party inquiries such as Qichacha, China Judgments Online, etc. to prove their legality. The Sales Department also conducts compliance investigations on suppliers and sends questionnaires to suppliers respectively to obtain relevant information and documents, including basic information, business activities, management structure, financial details and responsible silver supply chain of suppliers.

2.1.2 供应商风险识别

2.1.2 Supplier risk identification

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

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

2.1.3 供应商风险评估，建立供应商档案

2.1.3 Supplier risk assessment and establishment of supplier files

公司白银供应链风险评估包括两个方面：国家风险、公司风险。在进行交易之前，销售部需要对供应商进行风险评估。国家风险包括含银物料来源于或曾运输经过受战争影响或人权遭受侵犯的地区（如需风险较大地区或人权遭受侵犯的地区的详细信息，请参见海德堡晴雨表）；公司风险包括：供应商或其上游公司

有参与洗钱、犯罪、腐败或其他风险较高的事宜；供应商、供应商上游公司或受益所有人均为政治性公众人物；供应商或其上游公司积极从事高风险商业活动。

The risk assessment of the Company's silver supply chain includes two aspects: national risk and company risk. Before conducting the transaction, the Sales Department needs to conduct a risk assessment on the Supplier. National risks include silver-containing materials from or transported through war-affected or human rights violations areas (see Heidelberg Barometer for details of areas with higher risks or human rights violations); Company risks include suppliers or their upstream companies' involvement in money laundering, crime, corruption or other high-risk matters; The supplier, the upstream company of the supplier or the beneficial owner are political public figures; Suppliers or their upstream companies actively engage in high-risk commercial activities.

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

After evaluation, if the supplier has involved in the above risk events, the Company defines the supplier as a high-risk supplier. A due diligence team of the Company will review the high-risk supplier, and the review procedures include on-site investigation and further verification of due diligence results. The Company will not establish any cooperative relationship with the supplier until the high-risk event is relieved. The Company will carry out normal cooperation with the supplier only after it is confirmed that there is no such high-risk event.

截至 2019 年 12 月 31 日，我们完成了对所有白银供应商的信息收集、风险识别和风险评估任务。风险评估结果完全记录在相应的 LBMA 供应链风险评估表中，包括评估标准、意见和理由，2019 年所有白银供应商均被认定为低风险

供应商。

As of December 31, 2019, we have completed the tasks of information collection, risk identification and risk assessment for all silver suppliers. The risk assessment results are completely recorded in the corresponding LBMA supply chain risk assessment form, including assessment criteria, opinions and reasons. In 2019, all silver suppliers will be identified as low-risk suppliers.

2.2 高风险供应链

2.2 High risk supply chain

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

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

(1) 原料银来源于、中转或者运经冲突影响或侵犯人权高风险地区。

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

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

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

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

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

(4) 在白银供应链中的公司或者其他已知的上游公司位于一个有着洗钱、

犯罪和贪污高风险的国家。

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

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

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

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

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

当上述评判标准任何一条客观存在时，则该供应链被判定为高风险供应链。部门合规小组成员应立即准备材料上报合规专员，由合规专员上报合规小组组长（总经理），由合规小组组长（总经理）批准采取应对措施，停止交易，消除风险。

When any of the above criteria exists objectively, the supply chain is judged as a high-risk supply chain. Members of the department compliance team shall immediately prepare materials and report them to the compliance officer, who shall report them to the compliance team leader (General Manager) for approval of countermeasures to stop trading and eliminate risks.

2.3 交易监测

2.3 Transaction monitoring

公司对所有交易情况进行监督，确保交易与供应链调查一致。

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

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

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

3 向高级管理层报告风险评估

3 Reporting risk assessments to senior management

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

The Company establishes a risk assessment report system, and the Compliance Officer reports the due diligence work of the department to the compliance team

leader every month. When it is found in the supply chain investigation that it comes from a high-risk area and is assessed as a high-risk supply chain, the transaction should be stopped and reported to the Compliance Team Leader (General Manager) for approval.

第三步：设计和实施应对已识别风险的策略

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

步骤 3 的合规性概述：在截至 2019 年 12 月 31 日，公司完全遵守了步骤 3：设计和实施应对已识别风险的策略。

Step 3 Summary of compliance: The Company has fully complied with Step 3: design and implement a strategy to respond to identified risks as of December 31, 2019.

根据风险评估结果，将供应商分为两个级别：低风险、高风险。我们对各级供应商采取了风险控制措施。具体如下：

According to the results of risk assessment, risks of suppliers are divided into two levels: low risk and high risk. We have taken risk control measures for suppliers at all levels. The details are as follows:

风险水平 Risk level	供应商类型 Supplier type	风险控制措施 Risk control measures
低风险 Low risk	现有供应商 Existing supplier	可以订购新的白银材料。现有订单可以发货。 New silver materials can be ordered. Existing orders can be delivered.
	新的供应商 New supplier	可接受新供应商。 New suppliers are acceptable.

高风险 High risk	现有供应商 Existing supplier	<p>所有未登记的订单都应暂停。 All unregistered orders should be suspended.</p> <p>如果货物已出发，应按照销售退货程序处理。If the goods have already been delivered, they should be handled according to the sales return procedure.</p> <p>重新评估应在最后一次评估后 180 天内进行。如果不符合现象消失，可以继续与供应商的合作，并将供应商列为低风险。 The reassessment should be carried out within 180 days after the last assessment. If the non-conformity phenomenon disappears, the cooperation with the supplier can be continued and the supplier can be listed as low risk.</p> <p>监控和评估结果应定期向相关高级管理层报告，以支持管理层决定是否与供应商合作。 Monitoring and evaluation results should be regularly reported to relevant senior management to support management in deciding whether to cooperate with suppliers.</p>
	新的供应商 New supplier	<p>不能接受新供应商 New suppliers are unacceptable.</p>

销售部作为持续尽职调查的一个部门，在供应商选择和合作上，需要持续关注合作风险，并进行风险评估。如果发现低风险供应商现有的正常合作可能涉及洗钱和恐怖融资、促进冲突、侵犯人权，应立即停止原料采购并开展相关调查。如果有确凿证据证明供应商涉及洗钱和恐怖融资、促进冲突、侵犯人权，公司应立即停止采购，终止合作关系。截至 2019 年 12 月 31 日，我们已完成了 2019 年所有白银原料供应商的风险识别和风险评估。2019 年未发现高风险白银供应链，因此未采取供应链风险减缓措施。

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

conflicts and violate human rights, the purchase of raw materials should be immediately stopped and relevant investigations should be carried out. If there is conclusive evidence that the supplier is involved in money laundering and terrorist financing, intensified conflicts and violation of human rights, the Company should immediately stop purchasing and terminate the cooperation relationship. As of December 31, 2019, we have completed the risk identification and risk assessment of all silver raw material suppliers in 2019. No high-risk silver supply chain was found in 2019, so no supply chain risk mitigation measures were taken.

第四步：安排对供应链的尽职调查进行独立第三方审计

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

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

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

公司严格遵守 LBMA 白银责任指南第四步“对精炼商的尽职调查实践开展独立的第三方审计”的要求。上一次审计时间为 2019 年 6 月，审核报告已经上传至我司官方网站 <http://www.glddjy.com/>。

The Company strictly abides by the requirements of Step 4 of LBMA Responsible Silver Guidance, “Independent Third Party Auditing of Refiners’ Due Diligence Practices”. The last audit took place in June 2019, and the audit report has been uploaded to our official website <http://www.glddjy.com/>.

本年度我们将继续请必维认证（北京）有限公司进行合理鉴证，本年度的审计将参照 ISAE3000 的方法执行。公司与必维认证（北京）有限公司（以下简称

“必维认证”) 签订了一份协议, 委托 BV 依据 ISAE3000 进行了 2019 年度的合理保证鉴证业务, 对我们遵守 LBMA 责任白银指南的合规性进行独立第三方审计。独立鉴证报告见附件。

This year, we will continue to engage Bureau Veritas Certification (Beijing) Co., Ltd. to carry out reasonable verification, and this year’s audit will be carried out according to ISAE3000 method. The Company has signed an agreement with Bureau Veritas Certification (Beijing) Co., Ltd. (hereinafter referred to as “Bureau Veritas Certification”) to entrust BV to carry out reasonable assurance and verification business in 2019 according to ISAE3000, and to conduct an independent third-party audit on our compliance with LBMA Responsible Silver Guidance. See the annex for the independent verification report.

第五步：每年报告一次供应链尽职调查

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

第 5 步的合规性概述：公司完全遵守了第 5 步：供应链尽职调查年度报告。

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

公司根据 LBMA 责任白银指南发布了《广东金业白银尽职调查合规报告（2019 年）》，以报告截至 2019 年 12 月 31 日的供应链尽职调查情况。

Pursuant to LBMA Responsible Silver Guidance, the Company issued the Guangdong Jinye Silver Due Diligence Compliance Report (2019) to report on the supply chain due diligence as of December 31, 2019.

三、管理结论

III. Management Conclusion

截至 2019 年 12 月 31 日, 公司建立了供应链过程和控制的管理体系, 发布

并实施了尽职调查管理政策。公司还收集了所有供应商信息，识别和评估了供应链中的风险，制定了风险控制措施，安排对供应链尽职调查进行独立第三方审计，并在 2019 年编制了供应链尽职调查报告。因此，在过去一年里公司完全遵守了 LBMA 责任白银指南。在下一阶段的工作中，公司致力于在现有白银供应链尽职调查制度的基础上持续改进，并将负责的白银供应链流程与我们现有的供应链流程更有效地结合起来，将定期对发现的任何纠正措施进行内部监控。

As of December 31, 2019, the Company has established a management system of supply chain process and control, issued and implemented a due diligence management policy. The Company also collected all supplier information, identified and evaluated risks in the supply chain, formulated risk control measures, arranged an independent third-party audit of supply chain due diligence, and prepared a supply chain due diligence report in 2019. Therefore, in the past year, the Company has fully complied with the LBMA Responsible Silver Guidance. In the next stage of work, the Company will remain committed to continuous improvement on the basis of the existing silver supply chain due diligence system, and will more effectively combine the responsible silver supply chain process with our existing supply chain process, and will regularly carry out internal control on any corrective measures found.

四、其他

IV. Others

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

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