

广东金业贵金属有限公司

Guangdong Jinye Precious Metals Co., Ltd.

白银供应商管理政策

Silver Supplier Management Policy

广东金业贵金属有限公司作为伦敦金银交易市场协会（LBMA）的会员，为全面实施 OECD 关于在冲突地区及高危地区供应链尽职调查指导方针，我公司现已推行 LBMA 尽责管理体系。

As a Good Delivery Refinery of the London Bullion Market Association (LBMA), in order to fully implement the OECD guidelines on supply chain due diligence in conflict zones and high-risk areas, Guangdong Jinye Precious Metals Co., Ltd. has implemented the LBMA Responsible Management System.

为配合我公司 LBMA 体系的顺利执行，各供应商应遵守 LBMA 管理体系的各项要求，并承诺向我公司提供的所有类别白银产品的收购均为合法，不涉及以下情况：

In order to coordinate the smooth implementation of our LBMA system, all suppliers shall comply with the requirements of the LBMA Management System and promise to our company that the acquisition of all types of silver products provided for us shall be legal and not involve

the following circumstances:

1、侵犯人权，强制劳役、童工、残酷，非人道和羞辱虐待；

1. Violation of human rights, forced labor, child labor, cruelty, inhumanity, and humiliating abuse;

2、战争犯罪，违反国际人权法，人权犯罪或种族屠杀；

2. War crime, violation of international human rights law, human rights crime, or ethnic cleansing;

3、洗钱，或自高风险、冲突地区采购贵金属；

3. Money laundering or procurement of precious metals from high risk, high conflict area;

4、对非政府武装集团直接或间接的支持，购买贵金属或提供协助。

4. Direct or indirect support to the non-governmental armed group and procurement of precious metals or offer assistance.

我公司认可的合格供应商提供的白银产品必须符合 LBMA 管理体系的各项要求，公司的相关对接单位须认真核实供应商信息，建立供应商信息管理档案，并不定期考察评估供应商风险。

Silver products from accredited suppliers must meet the requirements of the LBMA Management System. Relevant liaison organizations of the Company shall carefully verify supplier information,

establish supplier information management files, and inspect and evaluate supplier risks from time to time.

根据《LBMA 负责任的白银指南》对与广东金业贵金属有限公司有白银交易、白银加工的所有白银供应商、白银相关合作伙伴进行以下风险等级分值设定（见附件一）。

According to the *LBMA Responsible Silver Guidance*, following risk level score shall be set for all silver suppliers and silver-related partners that have silver trading or silver processing with Guangdong Jinye Precious Metals Co., Ltd.(see Annex I).

根据风险分值，公司对与广东金业贵金属有限公司有白银交易、白银加工的所有白银供应商、白银相关合作伙伴达到以下分值，分别采取不同的风险终止办法（见附件二）。

The Company shall adopt different risk termination measures for all silver suppliers and silver-related partners that have silver trading and silver processing with Guangdong Gold Industry Precious Metals Co., Ltd. according to the following score (see Annex II).

请各供应商自觉遵守以上制度，并与我公司签订《供应商社会责任承诺书》（见附件三）。

All suppliers are required to consciously abide by the above system and sign the *Letter of Commitment for Social Responsibility of the Supplier* (see AnnexIII) with our company.

本管理政策自发布之日实施。

The Management Policy shall be implemented from the date of release.

广东金业贵金属有限公司

Guangdong Jinye Precious Metals Co., Ltd.

2019年2月15日

February 15, 2019

附件一：风险等级分值

Annex I: Risk Level Score

序号 No.	评估方 Assessment party	评估内容 Assessment content	分值 Score
1	商业交易方 (含银行) Commercial transaction party (including banks)	1.1 相关营业执照等 1.1 Relevant business license, etc.	6 分 6 poi nts
		1.2 相关收益人 1.2 Relevant beneficiary	2 分 2 poi nts
		1.3 收益人身份文件 1.3 Identification document of the beneficiary	2 分 2 poi nts

		1.4 相关商业关系 1.4 Relevant business relationship	2 分 2 poi nts
		1.5 财务状况 1.5 Financial condition	2 分 2 poi nts
		1.6 白银源产地资料信息等 1.6 Information of silver origin and so on	6 分 6 poi nts
2	矿场方 Mine field party	2.1 证明合理和善意之努力识别白银 的产地来源 2.1 Reasonable proof and goodwill effort to identify the origin of silver	6 分 6 poi nts

2.2 采矿许可证

3

2.2 Mining license

分

			3 poi nts
		2.3 进/出口白银许可证 2.3 Silver import/export license	5 分 5p oin ts
		2.4 采矿情况信息 2.4 Information of mining condition	2 分 2 poi nts
		2.5 开采能力的的数据 2.5 Data of mining ability	2 分 2 poi nts
3	回收金 (含自然人) Recovery gold (including a natural		

3.1 再生银供应商资质信息 6

3.1 Qualification information of the 分

regenerated silver supplier 6

			nts
			2 分
		3.2 再生银供应商商业关系	2
		3.2 Business relationship of the regenerated silver supplier	poi nts
			4 分
		3.3 再生银供应商白银来源证明	4
	person)	3.3 Silver source proof of the regenerated silver supplier	poi nts
		3.4 再生银供应商相关收益人背景情况描述等	4 分
		3.4 Background description of the relevant beneficiary of the regenerated silver supplier and so on	4 poi nts
		3.5 再生银供应商相关收益人身份文件	4 分
		3.5 Identification document of the relevant beneficiary of the regenerated silver supplier	4 poi nts

附件二：风险分级

Annex II: Risk Ranking

序号 No.	风险等级 Risk level	风险值 (R) Risk value(R)	控制要求 Control requirement
1	(i)低风险 (i)Low risk	$R \geq 6$ 分 $R \geq 6$ points	继续交易减少风险 Continue transaction to reduce risks
2	(ii)中风险 (ii)Medium risk	$2 \text{ 分} < R < 6 \text{ 分}$ $2 \text{ points} < R < 6$ points	暂停交易减少风险 Suspend transaction to reduce risks
3	(iii)高风险 (iii)High risk	$R \leq 2$ 分 $R \leq 2$ points	停止交易摆脱风险 Stop transaction to get rid of risks

附件三：

Annex III:

供应商社会责任承诺书

Letter of Commitment for Social Responsibility of Supplier

供应商名称：责任人：

Supplier Name: _____ Responsible Person: _____

地址：电话：

Address: Tel:

广东金业贵金属有限公司：

Guangdong Jinye Precious Metals Co., Ltd.:

我们公司已经收到贵公司发送的符合 LBMA 尽责管理体系的采购政策，为保障本项政策的顺利推行，我们公司愿意遵守本管理体系的各项要求，在日常经营合作中配合贵公司执行本项工作。我谨代表本公司向贵司承诺：

Our company has received the purchasing policy that conforms to the LBMA Responsible Management System sent by your company. In order to ensure the smooth implementation of this policy, our company is willing to comply with the requirements of the Management System and cooperate with your company to carry out this work in daily business cooperation. On behalf of our company, I hereby promise to you that:

本公司愿意主动承担社会责任，积极回馈社会，倾力于保证企业员工的健康和安全，为贵公司提供的所有类别白银产品的收购均为合法所得，不涉及以下情况：

Our company is willing to take the initiative to assume social responsibilities, actively contribute back to the society, and devote ourselves to ensuring the health and safety of our employees. The acquisition of all kinds of silver products for your company is legally obtained and not involves the following circumstances:

- 1、 侵犯人权， 强制劳役、 童工、 残酷， 非人道和羞辱虐待；
1. Violation of human rights, forced labor, child labor, cruelty, inhumanity, and humiliating abuse;
- 2、 战争犯罪， 违反国际人权法， 人权犯罪或种族屠杀；
2. War crime, violation of international human rights law, human rights crime, or ethnic cleansing;
- 3、 洗钱， 或自高风险、 冲突地区采购贵金属；
3. Money laundering or procurement of precious metals from high risk, high conflict area;
- 4、 对非政府武装集团直接或间接的支持， 购买贵金属或提供协助。
4. Direct or indirect support to the non-governmental armed group and procurement of precious metals or offer assistance.

说明：

Notes:

- 1、 本承诺书向全体员工及利益相关者公开， 自发布之日起实施。
1. This Letter of Commitment shall be made public to all employees and stakeholders and shall be implemented from the date of release.
- 2、 我公司接受贵公司进行不预先通知的检查， 包括对生产场所、 办公地点、 账簿、 文件、 雇佣事项及记录， 以确保本承诺得到有效贯彻。

2. Our company accepts your unannounced inspections of production sites, offices, books, documents, employment matters, and records to ensure that this commitment is effectively carried out.

总经理：

General Manager：

公司印章：

Company seal:

时间：

Time: