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**Silver Supply Chain Due Diligence
Rules**



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白银供应链尽职调查规则适用范围

Scope of Application for Silver Supply Chain Due Diligence Rules

一、适用范围

I. Scope of application

本白银供应链尽职调查规则，适用于广东金业贵金属有限公司、以及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。（包括白银生产商、中间商、白银交易商、出口商和运输商。）

These Due Diligence Rules of Silver Supply Chain are applicable to Guangdong Jinye Precious Metals Co., Ltd. and all silver suppliers and silver related partners of silver trading and silver processing with Guangdong Jinye Precious Metals Co., Ltd. (including silver producers, resellers, silver dealers, exporters, and carriers.)

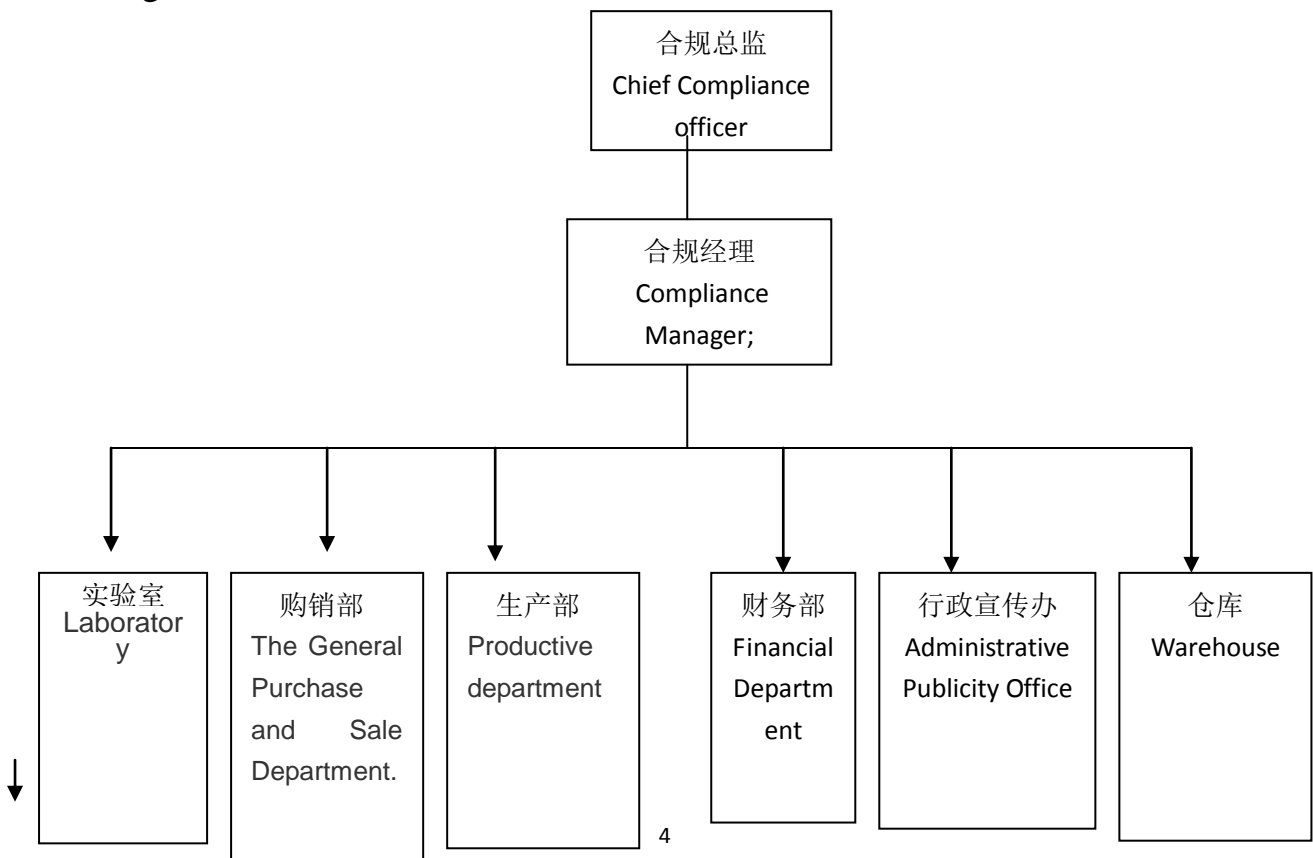
白银供应链公司内部组织架构及责任 Internal Organizational Structure and Responsibilities of Silver Supply Chain Company

一、白银供应链公司内部组织架构

I. Internal organizational structure of silver supply chain company

广东金业贵金属有限公司为白银供应链尽职调查设立了专门的组织，组织结构如下：

Guangdong Jinye Precious Metals Co., Ltd. has established a special organization for due diligence on the silver supply chain, and the organization structure is as follows:



二、白银供应链公司内部组织责任

II. Internal organizational responsibilities of silver supply chain company

1、合规总监

1. Chief Compliance officer

合规总监对白银供应链上的所有事项负责，负责监督供应链所有事项

The Compliance Risk Control Officer is responsible for everything in the silver supply chain.

2. 合规经理

2. Compliance Manager

(1) 有权监查白银供应链尽职调查过程，并评估尽职调查是否充分进行；如果认为必要，有权要求提供附加文件或信息。

(1) The Compliance Risk Control Officer shall have the authority to monitor the due diligence on the silver supply chain and assess whether the due diligence has been adequately conducted; the Compliance Risk Control Officer shall have the right to request additional documents or information if deemed necessary.

(2) 如果存在高风险供应链或交易，需要及时向集团分管副总汇报。

(2) If there is a high-risk supply chain or transaction, the Compliance Risk Control Officer shall report to the Vice President of the Group promptly.



(3) 定期对员工进行白银供应链规则培训，起草和更新白银供应链规则，为高级管理层履责提供准确的信息。

(3) Conduct regular training on rules of the silver supply chain for employees. Draft and update the rules of the silver supply chain to provide accurate information for senior management for compliance.

(4) 负责起草内部的 LBMA 合规报告。

(4) Be responsible for drafting internal LBMA compliance report.

2、合规专员

2. Compliance Officer

合规专员负责收集与保存足够的现货供应链的证明文件，如供应商营业执照、采矿许可证、身份证复印件，白银采购合同、供应商社会责任承诺书等。

The Compliance Officer is responsible for collecting and keeping sufficient documentary evidence of the spot goods supply chain including the business license of the supplier, mining license, copy of ID card, silver procurement contract, social responsibility commitment of the supplier, etc.

(1) 每年至少一次对重要现货客户（年供应量达到 1000kg）进行现场调查；

(1) The crucial spot goods customers (with the annual supply reaching 1000kg) should be provided with the field investigation at least once a year;



(2) 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；

(2) It is needed to assist and encourage the spot silver supplier to promise and confirm to comply with the due diligence regulations of the silver supply chain in written form;

(3) 如出现异常情况需及时向合规风控官报告。

(3) It is needed to report to the Compliance Risk Control Officer in time if there are any abnormal conditions.

3、进出口部合规专员

3. Compliance Officer of Import and Export Department

进出口部合规专员负责收集与保存足够的进出口供应链的证明文件，如供应商营业执照、采矿许可证、身份证复印件，白银采购合同、供应商社会责任承诺书等。

The Compliance Officer of the Import and Export Department is responsible for collecting and keeping sufficient documentary evidence of import and export supply chain including the business license of the supplier, mining license, copy of ID card, silver procurement contract, social responsibility commitment of the supplier, etc.

(1) 每年至少一次对进出口重要客户（年供应量达到 1000kg）进行现场调查；

(1) The crucial import and export customers (with the annual supply reaching 1000kg) should be provided with the field investigation at least

once a year;

(2) 协助与鼓励进出口白银供应商承诺且书面确认遵守白银供应链尽职规则;

(2) It is needed to assist and encourage the silver import and export supplier to promise and confirm to comply with the due diligence regulations of the silver supply chain in written form;

(3) 如出现异常情况需及时向合规风控官报告。

(3) It is needed to report to the Compliance Risk Control Officer in time if there are any abnormal conditions.

4、财务部合规专员

4. Compliance Officer of Financial Department

财务部合规专员其职责为完整保存所有客户的交易凭证。

The Compliance Officer of the Financial Department is responsible for keeping completed transaction vouchers of all customers.

(1) 交易凭证包括但不限于：出入库单、客户相关合法资质证明等，记录保存至少 5 个会计年度；

(1) The transaction vouchers include but are not limited to: warehousing lists, relevant customer certificates for legal qualification, etc. The records shall be kept for at least five fiscal years.

(2) 如出现异常情况需及时向合规风控官报告。

(2) It is needed to report to the Compliance Risk Control Officer in time if there are any abnormal conditions.

5、物流合规专员

5. Logistics Compliance Officer

物流合规专员其职责为选择符合白银运输资质要求的运输公司、保险公司。

The Logistics Compliance Officer is responsible for selecting the transport companies and insurance companies under the qualification requirements for silver transportation.

(1) 按要求保存每一运单、保单，并跟踪运单情况，确定运输公司或保险公司运输路线；

(1) Each waybill and insurance policy shall be kept as required and it is needed to track the waybills to ensure transport route of transport companies or insurance companies;

(2) 如出现异常情况需及时向合规风控官报告。

(2) It is needed to report to the Compliance Risk Control Officer in time if there are any abnormal conditions.

6、金业合规专员

6. Gold Industry Compliance Officer

金业合规专员其职责为定期根据合规审核流程。

The Gold Industry Compliance Officer is responsible for reviewing the process as per the compliance regularly.

(1) 收集、整理 LBMA 相关数据，完成日常合规报告；

(1) Collect and clear up the relevant data of LBMA to complete the daily

compliance report;

(2) 不定时上报员工对白银供应链或者任何新确认的风险的建议和意见，并提出自己的意见。

(2) Report the ideas and suggestions of the staff for the silver supply chain or any newly-confirmed risks irregularly, and put forward the own idea.

高风险白银供应链评判标准

Judgment Criteria of High-risk Silver Supply Chain

CAHRA: 受冲突影响和高风险地区

受冲突影响和高风险地区 (CAHRA): 该等地区存在武装冲突、普遍暴力或其他对人民造成伤害的风险。武装冲突可以采取多种形式, 如国际或非国际性质的冲突, 可能涉及两个或两个以上的国家, 也可能包括解放战争、叛乱战争、内战等。高风险地区可能包括政治不稳定或受到压制、体制薄弱、不安全、民用基础设施崩溃和普遍暴力的地区。这些地区的特点往往是普遍存在侵犯人权和违反国内法或国际法的现象。

为了评估其供应链中来源和运输路线位置的可能的 CAHRA 状态, 该公司使用了诸如:

1. 海德堡国际冲突研究所-冲突晴雨表 (hiik.de)
2. 控制风险 - 风险地图 / 政治和安全风险预测 (www.controlrisks.com)
3. 风险管理通知/指数 (www.inform-index.org)



Conflict Affected and High Risk Areas (CAHRA): These areas are at risk of armed conflict, widespread violence, or other harm to people. Armed conflicts can take various forms, such as international or non international conflicts, which may involve two or more countries, as well as wars of liberation, rebellion, civil war, etc. High risk areas may include areas of political instability or oppression, weak institutions, insecurity, collapse of civilian infrastructure, and widespread violence. The characteristic of these regions is often the widespread violation of human rights and domestic or international law.

In order to evaluate the possible CAHRA status of sources and transportation route locations in its supply chain, the company used methods such as:

Heidelberg Institute for International Conflict Studies - Conflict Barometer ([hiik. de](http://hiik.de))

2. Control Risk - Risk Map/Political and Security Risk Prediction ([www.controllrisks. com](http://www.controllrisks.com))

3. Risk Management Notice/Index (www.inform index. org)

白银供应链尽职调查规定

Silver Supply Chain Due Diligence Regulations

一、白银供应链尽职调查措施

I. Due diligence measures of silver supply chain

公司内部对所有白银交易、白银加工的所有白银供应商、白银相关合作伙伴建立相应的白银供应链尽职调查措施，并在交易时明确告知。白银供应链尽职调查措施主要包含：

Within the Company, corresponding due diligence measures of silver supply chain specific to all silver suppliers and relevant cooperative silver partners involved in all silver transactions and processes shall be established and explicitly informed during transactions. The due diligence measures of the silver supply chain mainly include:

1、建立供应链客户档案。包括：名称、法定代表人、地址、联系方式、运营方式、交易合同等。

1. It is important to establish customer archives of the supply chain, including: names, legal representatives, addresses, contact information, operation ways, business contracts, etc.

2、对既有供应链客户需定期进行核查，如有新建及变更的客户，需及时对其进行档案资料核查，并更新档案资料库。

2. The existing supply chain customers are required to be verified regularly. If there are any newly-added or changed customers, it is needed



to verify archival data timely and update the archive database;

3、确定供应链的每一客户不在任何政府的洗钱、诈骗或恐怖主义通缉名单上。

3. It is important to ensure that each customer of the supply chain is not on the government's wanted list of money laundering, defraud or terrorism;

4、定期获取供应链客户经营状况（包括商业与财务详情）及交易目的信息。

4. It is needed to obtain the information on operation conditions (including commercial and financial details) and the trading purpose of the supply chain customers.

二、矿产银客户

II. Mineral silver customers

矿产银客户，在交易时，需注意以下问题，同时告知客户：

For the mineral silver customers, it is needed to notice the following questions during the transaction and inform the customers at the same time:

1、必须获得白银的产地来源信息。;

1. The silver origin information must be obtained;

2、提供采矿许可证;

2. It is needed to provide the mining license;

3、提供进/出口白银许可证;



3. It is needed to provide the silver import/export license;
- 4、采矿情况信息证明，包括：是否侵犯人权、是否违规操作等；
4. Mining information proof is required, including whether the human right is violated, whether it is a violation operation and others;
- 5、开采能力数据；
5. Mining ability data is required;
- 6、公司会持续不断的对矿产银客户进行尽职调查。
6. The Company will constantly perform due diligence for the mineral silver customers.

三、回收银客户

III. Recovery silver customers

回收银客户，在交易时，需注意以下问题，同时告知客户：

For the recovery silver customers, it is needed to notice the following questions during the transaction and inform the customers at the same time:

- 1、再生银供应商需提供合法的商业关系，包括：再生银来源证明、收益人证明等；
1. The regenerated silver suppliers need to provide legal commercial relationships, including origin identification of regenerated silver, beneficiary certificate, etc.
- 2、公司会持续不断的对再生银客户进行尽职调查。
2. The Company will constantly perform due diligence for the mineral

silver customers.

四、高风险情况处理步骤

IV. Process steps for high-risk conditions

通过风险等级判断，出现高风险情况时，公司将采取以下步骤进行处理：

Though the judgment of risk level, when there are any high-risk conditions, the Company will take the following steps to deal with it:

1、现场调查/访问高风险供应链，证实供应链尽职调查文件记录的调查结果。

1. The high-risk supply chain shall be provided with the field investigation/visit to testify the investigation result of the document records for the supply chain due diligence;

2、对于大规模开采的白银：使用可信的独立来源的文件、数据和信息来核实情况，从矿山到精炼厂，供应链中每一家公司（包括白银生产商、中间商、白银交易商、出口商和运输商）的收益所有人和政府监控名单信息都要求要核实。

2. For the silver from large-scale mining: it is needed to verify the situation by utilizing reliable documents, data and information from an independent source. From the mine to the refinery, the information of both the benefit owner of every company in the supply chain (including the silver producers, middlemen, dealers, exporters and carriers) and the governmental monitoring list is required to be verified;



3、对于手工/小型矿开采的白银：使用可靠的独立来源的文件、数据和信息来核实情况，从白银出口商到精炼厂，供应链中每一家公司（包括国际白银交易商和运输商）的收益所有人和政府监控名单信息都要求要核实。

3. For the silver from manual mining/small mines: it is needed to verify the situation by utilizing reliable documents, data and information from an independent source. From the silver exporter to the refinery, the information of both the benefit owner of every company in the supply chain (including the international silver dealers and carriers) and the governmental monitoring list is required to be verified;

4、对于回收银：使用可信的独立来源的文件、数据和信息来核实情况，从白银供应方到精炼厂，供应链中每一家公司（包括运输商）的收益所有人和政府监控名单信息都要求要核实。

4. For recovery silver: it is needed to verify the situation by utilizing reliable documents, data, and information from an independent source. From the silver supplier to the refinery, the information of both the benefit owner of every company in the supply chain (including the carriers) and the governmental monitoring list is required to be verified.

白银供应链交易监控

Silver Supply Chain Transaction Monitoring

公司将对交易关联的过程贯穿始终的审查和监管，来确保交易时对供应链的了解和风险预测一致。对交易的监管运用基于风险的方法来开展。

The Company will conduct review and regulation throughout the transaction for the transaction-related process to ensure the conformity of knowledge for supply chain and risk forecasting during the transaction. The regulatory application of the transaction is carried out based on risk.

因此，公司对每一批收到的白银获取并记录以下信息：

Accordingly, the Company obtains and records the following information for each silver shipment received:

一、原生银

I. Natural silver

1、预估的重量和化验结果（来自供应方）。

1. Estimated weight and test results (from the Supplier).

2、航运/货运单据（运货/空运单、形式发票）。

2. Shipping/freight document (Freight/air waybill, proforma invoice).

3、高风险交易的进出口表格。

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

二、回收银

II. Recovered silver

1、预估重量（来自供应方）。

1. Estimated weight (from the Supplier).

2、航运/货运单据（运货/空运单、形式发票）。

2. Shipping/freight document (Freight/air waybill, proforma invoice).

3、回收银出现高风险交易情况，公司必须要求客户提供相应文件进行相互印证，核实文件是否真实相符，同时进行交易背景调查，情况不一致的需要通过调查并得出书面调查结果。

3. In case of high-risk transactions of recovered silver, the Company must require the customer to provide corresponding documents for mutual verification to verify whether the documents are true and consistent. At the same time, it is needed to conduct a background check on the transaction. If there is any inconsistent situation, the company shall conduct an investigation and prepare a written investigation result.

每年各部门合规专员需向风控合规专员提交风险评估报告，由风控合规专员向高级管理层提交汇总后的风险评估报告。

Each year, the Compliance Officer of each department shall submit the risk assessment report to the Risk Control Compliance Officer and the Risk Control Compliance Officer shall submit the summarized risk assessment report to the senior management.

公司高级管理层通过风险评估包括审批每一个评估为高风险的供应链，并每年重新决定是否继续与之保持商业关系。



The senior management of the Company conducts risk assessment including approval for each supply chain that is evaluated as high-risk, and re-decides whether to continue the business relationship with it annually.



白银供应链尽职调查文件记录保存

Retention of Due Diligence Documents and Records for Silver Supply Chain

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，来证明充分且持续的完成了尽职调查。记录保存至少5个会计年度。

The Company shall keep adequate supply chain documentation records and assess risk requirements according to the standards for the due diligence system of the supply chain to demonstrate that the due diligence has been fully and continuously completed. The records shall be kept for at least 5 fiscal years.

白银供应链尽职培训

Due Diligence Training of Silver Supply Chain

公司每年会对白银供应链中的所有员工进行该规则的培训。并将培训计划纳入公司年度培训计划当中。

The company trains all employees working in the silver supply chain on this rule every year and incorporates the training plan into the annual training plan of the Company.

一、培训要求

I. Training requirements

所有员工必须参加，并通过培训签到的形式进行相关培训确认。

All employees must attend the training and it is needed to conduct relevant training confirmation through the form of training sign-in.

二、培训方式

II. Training method

采用内训讲解授课方式，讲师由合规风控官指定，人力资源部配合安排。

The teaching method of internal training explanation is adopted. The lecturer shall be appointed by the Compliance Risk Control Officer and the Human Resources Department shall cooperate with the arrangement.

三、培训反馈

III. Training feedback



培训后，由基层管理者进行培训效果检查。检查不合规者，进行再培训。再培训名单由基层管理者提供。

After training, the primary-level management shall check the training effect. In case of non-compliance, re-training is required. The re-training list shall be provided by the primary-level management.

四、培训档案

IV. Training files

培训后，需建立相应培训档案。记录保存至少5个会计年度。

After the training, the corresponding training files shall be established and the records shall be kept for at least 5 fiscal years.

白银供应链违规上报通讯机制

Communication Mechanism for Violation Report of Silver Supply Chain

所有公司内部白银供应链相关工作人员如发现违规事项，应及时向所属板块合规专员进行邮件及电话报告，再由合规专员向合规风控官进行邮件及电话报告。

If any staff related to the company's internal silver supply chain finds any violation, he/she shall timely report by email and phone to the compliance officer of his/her respective sector, who shall then report by email and phone to the Compliance Risk Control Officer.

序号 No.	职位 Position	姓名 Name	电话 Tel	邮箱 E-mail
1	合规总监 Chief Compliance officer	刘德权 Liu Dequan	13922662506	1305338273@qq.com
2	金业合规专员 Gold Industry Compliance Specialist	覃超伦 QinChaoLun	13411783956	603523267@qq.com
3	现货部合规专员 Spot Goods Department Compliance Specialist	辛幸君 Xin Xingjun	13826775417	372243200@qq.com
4	进出口部合规专员 Import and Export Department Compliance Specialist	范平 Fan Ping	13826836518	706604370@qq.com
5	财务部合规专员 Financial Department Compliance Specialist	廖意 Liao Yi	13826796613	514094179@qq.com
6	物流部合规专员 Logistics Department	张颖 Zhang Ying	13826790452	707939639@qq.com



广东金业贵金属有限公司

Guangdong Jinye Precious Metals Co., Ltd.

LBMA001

	Compliance Specialist			
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广东金业贵金属有限公司

Guangdong Jinye Precious Metals Co., Ltd.

行政部

Administration Department

2022年2月10日

February 10, 2022