

	内控文件名称：含银原料供应链尽职调查 管理办法	内控版：第一版
	内控文件编号：QB-SJ-LBMA202304	主控部门：生产技术部
	校准者：管有祥	生效日期：2023年01月

## 含银原料供应链尽职调查管理办法

为了尊重人权不对国际社会产生负面影响，并遵照反洗钱要求，打击恐怖主义融资行为，根据《伦敦贵金属市场协会(LBMA)责任白银准则》要求和《OECD 冲突影响地区和高风险地区矿产品责任供应链尽职调查指南》，特制定永兴贵研资源有限公司白银供应链尽职调查管理办法。

According to the requirements of the London Bullion Market Association (LBMA) Responsible Silver Guideline and the OECD Guidelines on Responsible Mineral Supply Chain Due Diligence in Conflict-Affected, the Silver Supply Chain Due Diligence Regulations of Sino-Platinum Metals(Yong Xing) Resources Co.,Ltd., are hereby formulated to combat systematic or widespread human rights violations, avoid conflicts, and comply with strict anti-money laundering requirements to combat terrorist financing.

### 1 范围

#### 1. Scope

办法适用于永兴贵研资源有限公司(以下简称“公司”)含银原料、再生银的所有供应商。本办法所涉及的白银源包括矿产银、再生银及 2018 年 1 月 1 日后生产的多种形式的库存白银。

The Regulations apply to all suppliers of mineral silver and recycled silver of Sino-Platinum Metals(Yong Xing) Resources Co.,Ltd. (hereinafter referred to as "the Company") Sources of silver covered in the Regulations include mineral silver, recovered silver and various forms of stored silver produced after January 1, 2018.

### 2 术语和定义





永兴贵研资源有限公司	内控文件名称：含银原料供应链尽职调查管理办法	内控版：第一版
内控文件编号：QB-SJ-LBMA202304		主控部门：生产技术部
校准者：管有祥		生效日期：2023年01月

## 2. Terms and definitions

本办法中涉及的术语和定义均采用《伦敦贵金属市场协会 (LBMA) 责任白银准则》所描述的内容。

The terms and definitions involved in the Regulations are those described in the London Bullion Market Association (LBMA) Responsible Silver Guideline.

## 3 组织架构及人员职责

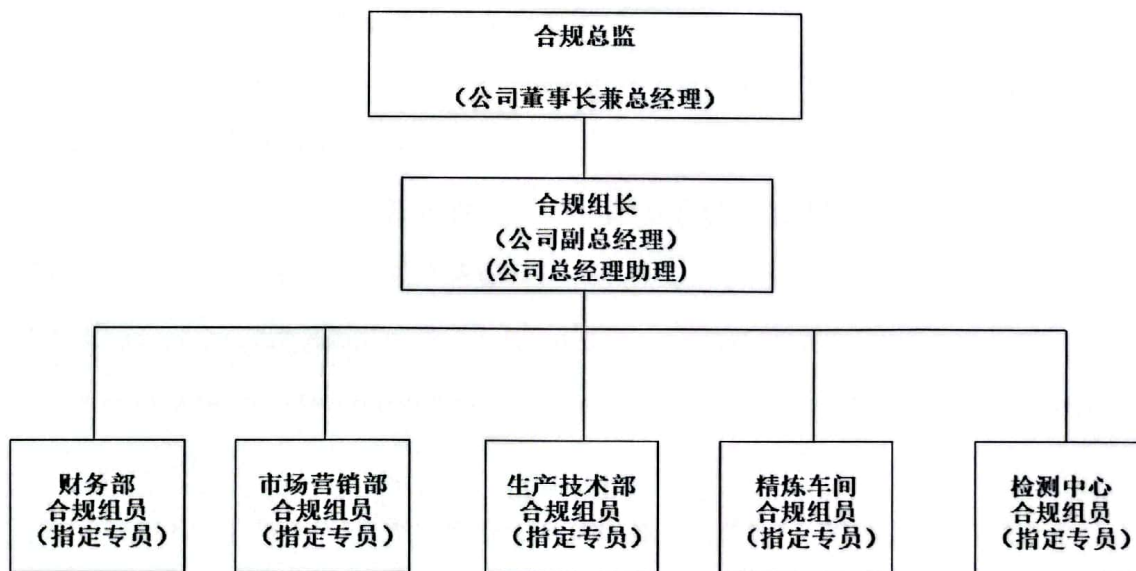
### 3. Organizational structure and personnel responsibilities

#### 3.1 组织结构

#### 3.1 Organizational structure

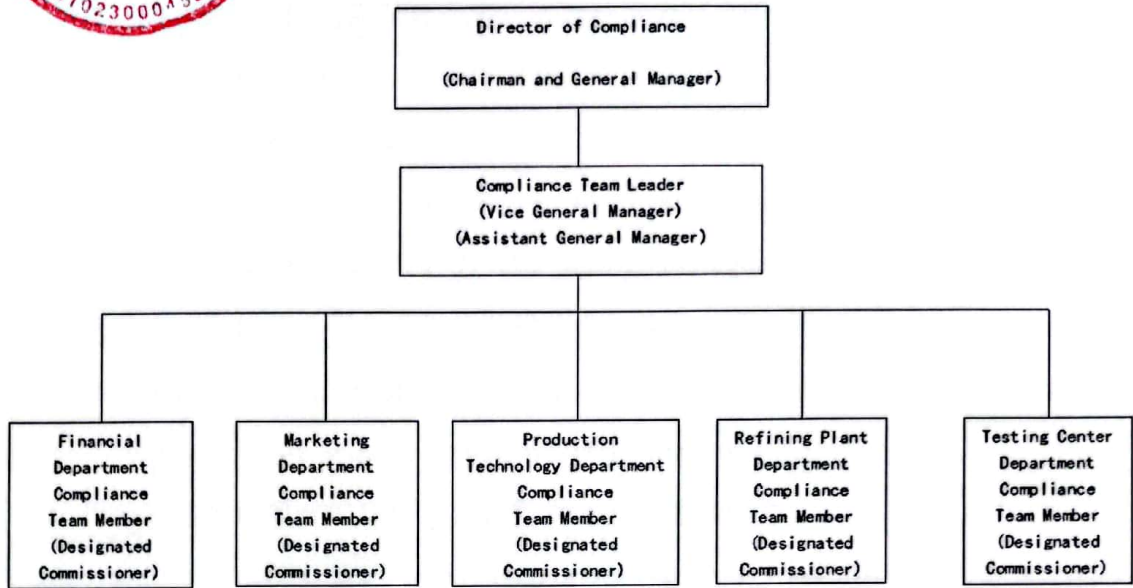
公司为白银供应链尽职调查工作设立了专门的组织，其架构如下：

The Company has set up a special organization for silver supply chain due work. Its structure is as follows:





永兴贵研资源有限公司	内控文件名称：含银原料供应链尽职调查管理办法	内控版：第一版
内控文件编号：QB-SJ-LBMA202304		主控部门：生产技术部
校准者：管有祥		生效日期：2023年01月



### 3.2 各类人员职责

#### 3.2. Responsibilities of various personnel

##### 3.2.1 合规总监职责

##### 3.2.1. Responsibilities of the Compliance Director

1) 全面负责公司白银供应链尽职调查工作。

1) In charge of and be fully responsible for the silver supply chain due diligence work of the Company.

2) 监督检查白银供应链尽职调查过程，并评估尽职调查是否全面进行：如果认为有必要，则要求提供附加文件或信息资料。

2) Conduct silver supply chain due diligence and evaluate whether the due diligence is adequately conducted; if necessary, ask for additional documents or information.

3) 对已识别出风险的白银供应链或交易采取适当的措施降低风险直至消除风险。

3) Take appropriate actions to reduce and eliminate risks in the silver supply chain or transaction where risks have been identified.

4) 如果存在高风险白银供应链或交易时，应及时向公司高管层汇报并采取严格的





永兴贵研资源有限公司	内控文件名称:含银原料供应链尽职调查管理办法	内控版: 第一版
内控文件编号: QB-SJ-LBMA202304	主控部门: 生产技术部	
校准者: 管有祥	生效日期: 2023年01月	

控制措施:推动并跟进最高管理者评估与审批被评为高风险的白银供应链。

4) In case there is a high-risk silver supply chain or transaction, promptly report it to the senior management of the Company and take strict control measures; be responsible for approving new silver supply chains that are rated as high-risk after authorized by the senior management

5) 负责审核和修订公司白银供应链相关方针政策。

5) Be responsible for drafting and revising the policies and guidelines related to the silver supply chain of the Company.

6) 为公司高管层履行尽职调查责任提供必要的准确信息。

6) Provide necessary and accurate information for the Company's senior management to fulfill their due diligence responsibilities.

7) 监督和检查并定期参加关于白银供应链尽职调查政策的培训情况。

7) To supervise and inspect and regularly participate in training on silver supply chain due diligence policy.

### 3.2.2 合规组长职责

#### 3.2.2. Responsibilities of compliance team Leader

1) 辅助合规总监安排并开展负责公司白银供应链尽职调查工作，辅助合规总监监督检查白银供应链尽职调查过程，并收集相关资料。

1) Assisted the compliance director in arranging and carrying out the due diligence work of the silver supply chain of the company, assisted the compliance director in supervising and inspecting the due diligence process of the silver supply chain, and collected relevant information.

2) 定期且参加对员工进行关于供应链尽职调查政策培训，并汇总上报公司内部员工对白银供应链尽职调查工作的意见和建议。

2) Regularly participate in training on supply chain due





永兴贵研资源有限公司	内控文件名称：含银原料供应链尽职调查管理办法	内控版：第一版
内控文件编号：QB-SJ-LBMA202304	主控部门：生产技术部	
校准者：管有祥	生效日期：2023年01月	

diligence policy for employees, and summarize and report the opinions and suggestions of internal employees on the due diligence work of silver supply chain.

3)负责起草公司白银供应链相关方针政策。

3) Responsible for drafting the company's silver supply chain policy.

4)为合规总监履行尽职调查责任提供首要的准确信息。

4)Provide the compliance director with the first level of accurate information necessary to fulfill his due diligence responsibilities.

### 3.2.3 财务部合规专员职责

#### 3.2.3. Responsibilities of Compliance Officer of Finance Department

1)严格执行供应链尽职调查措施和高风险白银供应链评判标准。

1) Strictly implement supply chain due diligence regulations and high-risk silver supply chain evaluation criteria.

2)负责收集并保存足够的白银供应链证明文件。保存白银供应商的所有交易及财务凭证《保存期限：为至少5个财务年度》。

2) Be responsible for collecting and maintaining sufficient silver supply chain documents, Completely keep all transactions and financial documents of silver suppliers for a period of at least 5 financial years.

3)评估白银供应商财务数据，理清其商业关系目的和本意信息

3)Evaluate the financial data of silver suppliers and clarify the purpose and original intention information of their business relations.

4)尽职调查过程和白银交易出现异常情况及时向合规组长报告

4)Report to the Compliance leader in case of abnormality in the due diligence process and silver transaction.

5)定期参加关于供应链尽职调查政策的培训。

5)Regularly participate in training on the responsible silver guidelines



 永兴贵研资源有限公司	内控文件名称:含银原料供应链尽职调查 管理办法		内控版: 第一版
	内控文件编号: QB-SJ-LBMA202304		主控部门: 生产技术部
	校准者: 管春祥		生效日期: 2023年01月

and the supply chain due diligence policy.

### 3.2.4 市场营销部合规专员职责

#### 3.2.4. Responsibility of compliance Specialist of Marketing Department

1) 严格执行白银供应链尽职调查措施和高风险白银供应链评判标准。

1) Strictly implement the supply chain due diligence regulations and high-risk silver supply chain evaluation criteria.

2) 负责收集并保存足够的白银供应链证明文件。

2) Be responsible for collecting and maintaining sufficient silver supply chain documents.

3) 负责收集并督促国内客户、进口商和出口商完成相应的尽职调查报告。

3) Be responsible for collecting and urging domestic customers, importers and exporters to complete corresponding due diligence reports.

4) 核实船代公司、运输公司资质, 跟踪和妥善保存每一批运单, 分析和评估货物所经过的运输线路。

4) Verify the qualifications of shipping agents and transportation companies, track and properly keep each shipping document, and analyze and evaluate the transportation routes through which the goods pass.

5) 定期对主要国内客户、国外供应商和国外客户进行现场调查

5) Conduct regular on-site investigations of major domestic customers, foreign suppliers and foreign customers.

6) 协助与鼓励国内、国外供应商承诺且书面确认遵守《OECD 冲突影响地区和高风险地区矿产品责任供应链尽职调查指南》附录 II 中的规定。

6) Assist and encourage domestic customers, foreign suppliers to commit and confirm in writing that they comply with the provisions in Appendix II of the OECD Due Diligence Guideline for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.





永兴贵研资源有限公司	内控文件名称:含银原料供应链尽职调查管理办法	内控版:第一版
内控文件编号:QB-SJ-LBMA202304	主控部门:生产技术部	
校准者:管有祥	生效日期:2023年01月	

7) 尽职调查过程和白银交易出现异常情况及时向合规组长报告。

7) Report to the Compliance leader in case of abnormality in the due diligence process and silver transaction.

8) 负责收集并督促国内供应商完成相应的尽职调查报告。

8) Be responsible for collecting and urging domestic suppliers to complete corresponding due diligence reports.

9) 定期对主要国内供应商进行现场调查。

9) Regularly conduct on-site investigation of major domestic suppliers.

10) 定期参加关于责任白银指南和供应链尽职调查政策的培训。

10) Regularly participate in training on the responsible silver guidelines and the supply chain due diligence policy.

### 3.2.5 生产技术部合规专员职责

3.2.5. Responsibilities of the Compliance Officer of the Production Technology Department

1) 严格执行供应链尽职调查措施和高风险白银供应链评判标准。

1) Strictly implement the supply chain due diligence regulations and high-risk silver supply chain evaluation criteria.

2) 负责收集并保存足够的白银供应链证明文件。

2) Be responsible for collecting and maintaining sufficient silver supply chain documents.

3) 核实运输公司资质,跟踪和妥善保存每一批运单,分析评估货品所经过的运输路线。

3) Verify the qualification of the transportation company, track and properly keep each shipping document, and analyze and evaluate the transportation route through which the goods pass.

4) 尽职调查过程和白银交易出现异常情况及时向合规组长报告



	内控文件名称：含银原料供应链尽职调查 管理办法	内控版：第一版
	内控文件编号：QB-SJ-LBMA202304	主控部门：生产技术部
	校准者：管有祥	生效日期：2023年01月

4) Report to the Compliance leader in case of abnormality in the due diligence process and silver transaction.

5) 辅助主持关于责任白银指南和供应链尽职调查政策的培训。

5) Assist in conducting training on silver accountability guidelines and supply chain due diligence policy.

6) 协助与鼓励国内客户承诺且书面确认遵守《OECD 冲突影响地区和高风险地区矿产品责任供应链尽职调查指南》附录 II 中的规定。

6) Assist and encourage foreign suppliers to commit and confirm in writing that they comply with the provisions in Appendix II of the OECD Due Diligence Guideline for Responsible Supply Chains of Minerals, from Conflict-Affected and High-Risk Areas.

7) 辅助主持关于责任白银指南和供应链层职调查政策的培训。

7) Assist in conducting training on silver accountability guidelines and supply chain due diligence policy.

### 3.2.6 检测中心合规专员职量

3.2.6 Responsibilities of the Compliance Officer of the Testing Center Department

1) 严格执行供应链尽职调查措施和高风险白银供应链评判标准。

1) Strictly implement the supply chain due diligence regulations and high-risk silver supply chain evaluation criteria.

2) 负责收集并保存足够的白银供应链证明文件。

2) Be responsible for collecting and maintaining sufficient silver supply chain documents.

3) 核实并记录每一批收到的白银产品重量和化验结果，分析和评估这些数据是否与供应链了解情况相符；如果不符则进行详细调查并得出书面调查报告。

3) Verify and record the weight and test results of each silver





	内控文件名称:含银原料供应链尽职调查 管理办法	内控版: 第一版
	内控文件编号: QB-SJ-LBMA202304	主控部门: 生产技术部
	校准者: 管有祥	生效日期: 2023年01月

product received, analyze and evaluate whether these data are consistent with the supply chain knowledge; in case there is any discrepancy, a detailed investigation shall be conducted and a written investigation report shall be produced.

4) 保留相关含银物料样品至少 3 个月以上。

4) Retain the relevant silver-containing material sample for at least 3 months.

5) 尽职调查过程和白银交易出现异常情况及时向合规组长报告

5) Report to the Compliance leader in case of abnormality in the due diligence process and silver transaction.

6) 定期参加关于责任白银指南和供应链尽职调查政策的培训。

6) Regularly participate in training on the responsible silver guidelines and the supply chain due diligence policy.

### 3.2.7 精炼车间部合规专员职责

### 3.2.7 Responsibilities of the Compliance Officer of the Refining Plant Department

1) 严格执行供应链尽职调查措施和高风险白银供应链评判标准。

1) Strictly implement the supply chain due diligence regulations and high-risk silver supply chain evaluation criteria.

2) 负责收集并保存足够的白银供应链证明文件。

2) Be responsible for collecting and maintaining sufficient silver supply chain documents.

3) 监督每批次含银物料的生产使用过程并做相应记录, 且保存记录至少 3 年以上。

3) Supervise the production and use process of each batch of silver-containing materials, make corresponding records and maintain it for





永兴贵研资源有限公司	内控文件名称：含银原料供应链尽职调查管理办法	内控版：第一版
内控文件编号：QB-SJ-LBMA202304	主控部门：生产技术部	
校准者：管有祥	生效日期：2023年01月	

at least 3 years.

4) 尽职调查过程和白银交易出现异常情况及时向合规组长报告。

4) Report to the Compliance leader in case of abnormality in the due diligence process and silver transaction.

5) 定期参加关于责任白银指南和供应链尽职调查政策的培训

5) Regularly participate in training on the responsible silver guidelines and the supply chain due diligence policy.

#### 4. 风险白银供应链评判标准

4. Evaluation criteria for risk silver supply chains

无论对于矿产银还是再生银，公司均严格按照《OECD 冲突影响地区和高风险地区矿产品责任供应链尽职调查指南》附录 II 中的规定识别风险。当白银供应链源头出现下述风险时公司应密切关注：

Regardless of mineral silver or recycled silver, the Company will identify risks in strict accordance with regulations in Appendix II of OECD Due Diligence Guideline for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. In case of the following risks in silver supply chain sources, the Company should pay close attention to:

1) 有关白银提取、运输或贸易的系统性或广泛人权侵犯行为，包括最严重的使用童工酷刑、非人道以及侮辱人格对待方式、广泛的性暴力或其他严重反人权强迫劳动、战争罪、反人类罪或种族灭绝罪；

1) Systematic or widespread human rights violations related to the extraction, transportation or trade of silver, including the most serious use of child labor, torture, inhuman and degrading treatment, widespread sexual violence or other serious forced labor against human rights, war crimes, crimes against humanity or genocide;

2) 向非法武装组织，或向通过供应链非法控制矿区、交易商、其他中介机构、运





永兴贵研资源有限公司	内控文件名称：含银原料供应链尽职调查管理办法	内控版：第一版
内控文件编号：QB-SJ-LBMA202304		主控部门：生产技术部
校准者：管有祥		生效日期：2023年01月

输路线的公共或私人安全武装提供直接或间接支持，或非法武装组织、公共或私人安全武装在整个供应链内非法征税、敲诈钱财或矿产品；

2) Direct or indirect support to illegal armed groups, or to public or private security forces that illegally control mining areas, dealers, other intermediaries, transportation routes through the supply chain, or illegally levying taxes or extorting money or mineral products throughout the supply chain (“illegal armed groups, public or private security forces”);

3) 通过贿赂或欺诈掩盖白银的原产地：

3) Bribery and fraudulent misrepresentation of the origin of silver;

4) 未遵照政府有关来自受冲突影响及高风险区域的矿产品的提取、贸易及出口的税费要求。

4) Failure to comply with government tax requirements regarding the extraction, trade and export of mineral products from conflict-affected and high-risk areas;

5) 洗钱或恐怖主义融资：

5) Money laundering and terrorist financing.

6) 资助冲突地区。

6) Financing conflict areas.

当上述评判标准任何一条客观存在时，则该白银供应链被判定为存在风险。部门合规专员应立即准备资料并上报合规组长，合规组长收集并整理好相关信息材料上报合规总监，由合规总监报告公司高管层并得到授权后审批该风险供应链的风险级别，并根据白银供应链风险减缓管理办法作出相应对策。

In case any of the above evaluation criteria exists objectively, the silver supply chain shall be evaluated as the high-risk supply chain, Department compliance specialist shall immediately prepare materials and report to compliance leader, The compliance team leader collects and sorts



	永研资源有限公司 内控文件名称:含银原料供应链尽职调查 管理办法	内控版: 第一版
	内控文件编号: QB-SJ-LBMA202304	主控部门: 生产技术部
	校准者: 管有祥	生效日期: 2023年01月

out relevant information materials and reports them to the compliance director, The Chief Compliance Officer shall collect and sort out the relevant information materials and report to executives of the Company and reapprove the high-risk supply chain with the authorization. Moreover, the Chief Compliance Officer shall make corresponding countermeasures according to the silver chain risk mitigation management regulations.

#### 5. 高风险白银供应链评判标准

#### 5. High-risk silver supply chain evaluation criteria

根据 LBMA 和 OECD 相关规定, 结合公司实际情况, 特规定如下白银供应链评判标准为高风险:

According to LBMA and OECD associated regulations and in combination with actual conditions of the Company, the following evaluation criteria for high-risk silver supply chains are specified:

1) 矿产银或再生银来自、已运送至或运输过程会经过受冲突影响或存在人权侵犯的高风险地区;

1) Mineral silver or recycled silver is originated from, transited in, and transported across high-risk areas affected by conflicts and with human rights abuse;

2) 矿产银声称产自具有有限已知储量、或已知白银资源有限以及预期白银产量有限的国家:

2) It is claimed that mineral silver comes from a country with limited known reserves, silver resources, or expected silver production;

3) 再生银来自已知或合理疑似的受冲突影响且存在人权侵权的地区, 或可能运至这一地区;

3) Recycled silver is originated from known high-risk areas affected by conflicts and with human rights abuse, or there are reasons to doubt that it





永兴贵研资源有限公司	内控文件名称:含银原料供应链尽职调查管理办法	内控版:第一版
内控文件编号:QB-SJ-LBMA202304	主控部门:生产技术部	
校准者:管有祥	生效日期:2023年01月	

is transited in the area;

4) 白银供应交易方或其也已知上游公司位于存在较高洗钱风险的国家:

4) Silver supply counter parties or its known upstream companies are located in a country with high risks of money laundering;

5) 白银供应交易方或对白银供应交易方具有重大影响的其他已知上游公司或其受益所有人为政治敏感人物。

5) Silver supply counter parties or other known upstream companies or its beneficial owners that have significant influence on it are politically sensitive person;

6) 白银供应交易方或其他已知上游公司从事高风险经营业务,例如:武器、博彩业、古董和艺术品、教派和其领导人:

6) Silver supply counter parties or its known upstream companies actively participates in high-risk business activities. such as weapons, gambling, antique, artwork, religion and being a religious leader;

7) 在白银供应链中的公司或其他已知的上游公司中存在强迫劳动的情形或嫌疑。

7) There is a pattern or suspicion of forced labor among companies in the silver supply chain or other known upstream companies.

8) 中国政府认定的其它高风险情况。

8) Other high risk situations recognized by the Chinese Government.

当上述评判标准任何一条客观存在时,则该白银供应链被判定为高风险供应链。部门合规专员应立即准备资料并上报合规组长,合规组长收集并整理好相关信息材料上报合规总监由台规总监报告公司高管层并得到授权后重新审批该高风险供应链,并在一定时间内实施所有强化尽职调查,并根据白银供应链风险减缓管理办法作出相应对策。

In case any of the above evaluation criteria exists objectively, the silver supply chain shall be evaluated as the high-risk supply chain. Department



 永兴贵研资源有限公司	内控文件名称：含银原料供应链尽职调查管理办法	内控版：第一版
内控文件编号：QB-SJ-LBMA202304	主控部门：生产技术部	
校准者：管有祥	生效日期：2023年01月	

compliance specialist shall immediately prepare materials and report to compliance leader, The compliance team leader collects and sorts out relevant information materials and reports them to the compliance director, The Chief Compliance Officer shall collect and sort out the relevant information materials and report to executives of the Company and reapprove the high-risk supply chain with the authorization. Moreover, the Chief Compliance Officer shall implement all enhanced due diligence within a certain period of time and make corresponding countermeasures according to the silver chain risk mitigation regulations.

## 6. 供应链尽职调查

### 6. Due diligence for supply chain

#### 6.1 原则

#### 6.1 Principle

为了有效的掌握供应链和评估风险，公司在与任何白银供应商建立业务关系之前都必须按照基于风险的方法履行供应链尽职调查。对供应链的风险评估始于对白银产地来源的调查。公司将持续不断的对白银供应链进行尽职调查，以确保有效符合 LBMA 规则要求。

In order to master the supply chain and assess risks effectively, the Company must perform due diligence for the supply chain in accordance with a risk-based approach before entering into business relations with any silver suppliers. The risk assessment shall begin with investigation of geographical origin of silver. The Company will constantly carry out due diligence for the supply chain of silver, so as to ensure effective compliance with LBMA rules.

#### 6.2. 程序

#### 6.2. Procedure

##### 6.2.1 供应商信息收集及评估



永兴贵研资源有限公司	内控文件名称：含银原料供应链尽职调查管理办法	内控版：第一版
内控文件编号：QB-SJ-LBMA202304	主控部门：生产技术部	
校准者：管有祥	生效日期：2023年01月	

### 6.2.1. Information collection and assessment of the Supplier

1) 建立供应链客户档案，包括：企业名称、法定代表人、地址、联系方式、营运方式、生产方式、交易合同等。

1) Create files of the supply chain customer, including: enterprise name, legal representative. address, contact information, operation manner, production mode and business contract, etc.

2) 对既有供应链客户需定期进行核查，如有新建或变更的客户，需及时对其进行档案资料检查，保持档案资料库处于最新状态。

2) Carry out regular inspection of supply chain customer. If there is new-add or modification in customers. it is needed to check their archives to keep the archive database up to date.

3) 识别每一客户、企业和企业收益所有人，使用可靠的独立来源文件、数据或者信息来验证其身份。

3) Identify every customer, enterprise and benefit owner of enterprise. Use reliable independent source documents, data or information to verify their identification.

4) 确定供应链中每一客户、企业和企业收益所有人不在任何政府的洗钱、诈骗或恐怖主义通缉名单上。

4) Confirm that every customer, company and benefit owner of company is not in the wanted list of money laundering, defraud or terrorism of the government.

5) 定期获取供应链客户商业和财务方面的详细情况、从事白银交易目的及商业运作情况。

5) Obtain detailed information for business and financial affairs, purposes of engagement in gold trading and business operation situation of supply chain customers regularly.



永兴贵研资源有限公司	内控文件名称:含银原料供应链尽职调查管理办法	内控版: 第一版
内控文件编号: QB-SJ-LBMA202304	主控部门: 生产技术部	
校准者: 管有祥	生效日期: 2023年01月	

6.2.2. 白银来源为矿产银的附加调查要求

6.2.2. Additional investigation requirements for the silver derived from mineral silver

1) 获取白银的产地来源信息。

1) Obtain the geographical origin information of silver

2) 如可能, 获取供应商采矿许可证信息。

2) Obtain the mining license information of the Supplier, if possible.

3) 如可能, 获取供应商进出口许可证信息。

3) Obtain the import and export license information of the Supplier, if possible.

4) 收集和评估采矿情况信息。

4) Collect and make an assessment on the information of mining situation.

5) 如可能, 获取开采能力数据。

5) Obtain mining capacity data, if possible.

6) 当矿产银来源于手工或小型矿场时, 应首先评估其是否合法: 如合法, 让对方提供相关资质证书; 如不合法, 则必须中断交易, 拒绝向其采购或接受其委托加工。

6) When the mineral gold (silver) comes from manual or small mines, it is needed to assess whether it is legal at first. If it is legal, it is important to ask the other party to provide relevant qualification certificates. If it is illegal, it is a must to suspend the transaction and refuse to procure from them or accept their manufacturing consignment.

6.2.3. 白银来源为再生银的附加调查要求如有可能, 收集和评估再生银供应商关于反洗钱-反恐怖主义融资的政策行动资料。

6.2.3. Additional investigation requirements for silver derived from recycled silver If possible. collect and estimate policy action documents about anti-money laundering and anti-terrorism financing of recycled silver





永兴贵研资源有限公司	内控文件名称:含银原料供应链尽职调查管理办法	内控版: 第一版
内控文件编号: QB-SJ-LBMA202304	主控部门: 生产技术部	
校准者: 管有祥	生效日期: 2023年01月	

suppliers.

6.2.4 高风险情况下强化尽职调查的附加要求公司根据供应商企业类型、业务关系交易类型、企业的地理位置或运输区域,用基于风险的方法决定实施尽职调查措施的程度。

1) 对应于更高风险的情况,公司将采取强化的尽职调查,并采取如下的附加处理步骤。实地考察或参观高风险供应链,证实供应链尽职调查结果的文件记录是否真实。

1) Investigate or visit high-risk supply chains on the site to verify if the document record of the due diligence result of high-risk supply chains is true.

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,供应链中的每一家企业(包括白银生产商、中间商、白银贸易商、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 large scale mining of silver: verify condition with documents, data, and information from trusted independent sources. Each return owner and government surveillance list information of each enterprise in the supply chain(including silver manufacturer, middleman, silver trader, exporter, and transporter) requires verification from mines to refineries.

3) 对于手工或小型矿开采的矿产银:使用可靠的独立来源的文件、数据和信息来核实情况,从矿产银出口商到精炼厂,供应链中的每一家企业(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 mineral silvers from manual or small-scale mining: verify condition with documents, data, and information from trusted independent sources. Each return owner and government surveillance list information of each enterprise in the supply chain (including international silver dealer and transporter)



永兴贵研资源有限公司	内控文件名称:含银原料供应链尽职调查管理办法	内控版: 第一版
内控文件编号: QB-SJ-LBMA202304	主控部门: 生产技术部	
校准者: 管有祥	生效日期: 2023年01月	

requires verification from mineral silver exporters to refineries.

4) 对于再生银:使用可靠的独立来源的文件、数据和信息来核实情况,从再生银供应方到精炼厂,供应链中的每一家企业(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 recycled silvers: verify the condition with documents, data, and information from trusted independent sources. Each return owner and government surveillance list information of each enterprise in the supply chain (including transporter) requires verification from recycled silver suppliers to refineries.

## 7. 交易监督

### 7.Transaction supervision

公司对白银交易的过程贯穿始终的审查和监督,以确保交易与公司对供应链的了解和风险预测相一致。对交易的监督公司运用基于风险的方法地开展。公司要求对每一批收到的白银获取并记录以下信息:

Investigation and supervision go throughout the silver trading process of the Company to ensure the transaction is consistent with understanding and risk prediction of the supply chain of the Company. The Company supervises transactions based on risks. The Company requires obtainment and record of the following information of each batch of received silver:

1) 对于矿产银:预估的重量和化验结果(由供应方提供):航运/货运单据(发货单、货运单、形式发票等);如可能,高风险交易的进出口表格。

1) For mined silver: Estimated weight and test results (provided by the supplier); Shipping or cargo documents (delivery documents, shipping documents, proforma invoice, etc. if possible): If possible, import and export form of high-risk transaction.

2) 对于再生银:预估的重量(由供应方提供):航运/货运单据(发货单、货运单、



永兴贵研资源有限公司	内控文件名称：含银原料供应链尽职调查管理办法	内控版：第一版
内控文件编号：QB-SJ-LBMA202304	主控部门：生产技术部	
校准者：管有祥	生效日期：2023年01月	

形式发票等)；如可能，高风险交易的进出口表格。

For recycled silver: Estimated weight (provided by the supplier): Shipping or cargo documents (delivery documents, shipping documents, proforma invoice, etc. if possible): If possible, import and export form of high-risk transaction.

公司将验证上述文件是否相互印证，是否与对供应链的了解情况相符。如出现交易背景不符的情况，将组织调查并得出书面调查结果。

The Company will verify if the documents above verify each other and are consistent with the understanding of the supply chain. In case of any transaction background discrepancy, an investigation will be conducted and a written survey result will be obtained.

## 8. 风险评估报告

### 8. Risk assessment report

评估报告：

公司合规总监每年初向公司高管层提交上一年度白银供应链尽职调查风险评估报告公司高管层对白银供应链保有最终控制权和最高责任。高管层谨慎选择和监督合规总监，并给予其必要的职权以完成其职责。

At the beginning of each year, the Company's Compliance Director shall submit the previous year's risk assessment report on silver supply chain due diligence to the Company's senior management.

The Company's senior management retains ultimate control and highest responsibility over the silver supply chain. Senior management carefully selects and supervises the Compliance Director and gives him the necessary authority to complete his duties.

根据高管层对每一个被评为高风险的新的供应链的评估与审批，每年重新决定是否继续与之保持商务关系。



永兴贵研资源有限公司	内控文件名称：含银原料供应链尽职调查管理办法	内控版：第一版
内控文件编号：QB-SJ-LBMA202304	主控部门：生产技术部	
校准者：管有祥	生效日期：2023年01月	

According to the authorization of the senior management, the Company's Compliance Director approves each new supply chain rated as high risk and re-determines whether to continue to maintain business relations with it every year.

#### 9. 记录保存

#### 9. Record retention

公司收集并保存足够的供应链证明文件记录，按照供应链尽职调查系统的标准来评判风险要求，以证明公司充分且持续地完成了白银供应链尽职调查工作。供应链证明文件记录要求保存至少 5 个会计年度。

The Company collects and reserves sufficient supply chain documentary evidence records and assesses risk requirements according to standards of the supply chain due diligence system, so as to prove that it adequately and continuously completes silver supply chain due diligence work.

It is required to preserve supply chain documentary evidence records for at least 5 accounting years.

#### 10. 培训

#### 10. Training

公司每年制定培训计划、定期对白银供应链中的所有员工进行尽职调查政策的培训并保留相关培训记录。

The company makes annual training plans, and the company regularly carries out training about due diligence policies for all personnel in the silver supply chain each year and keeps these training records.

#### 11. 信息沟通机制

#### 11. Information communication mechanism

部门合规专员负责定期收集并汇总上报公司内部员工对白银供应链尽职调查工



永兴贵研资源有限公司	内控文件名称:含银原料供应链尽职调查管理办法	内控版: 第一版
内控文件编号: QB-SJ-LBMA202304	主控部门: 生产技术部	
校准者: 管有祥	生效日期: 2023年01月	

作的意见和建议。

Compliance Officers of departments regularly collect, summarize, and submit opinions and suggestions of the Company's internal personnel towards the silver supply chain due diligence work.

在日常白银交易和供应链管理工作中, 公司所有员工如发现违规事项或异常情况, 应立即向所在部门合规专员报告; 合规专员经核实后应立即向合规组长报告; 合规组长在组织好相关材料上报合规总监, 必要时以书面形式报告公司高管层。

When finding violation matters or abnormal conditions in daily silver transaction and supply chain management work, personnel of the Company shall immediately report it to Compliance Officers of their departments, the compliance specialist shall report to the compliance leader immediately after verification, Compliance leader is organizing relevant materials to report to compliance director, report in writing to senior management if necessary.


公司所有员工在日常白银交易和供应链管理工作中发现违规事项或异常情况如需匿名汇报或举报的, 可将汇报或举报材料通过电子邮件形式发送至 yxgy20232023@163.com, 或直接将材料投入设于办公室一楼的意见箱。公司将指定专人收集材料并上报公司进行处理。

If all employees of the company find irregularities or abnormal situations in daily silver trading and supply chain management, they need to report or report them anonymously report or report materials can be sent to yxgy20232023 @163.com via email, Or directly into the suggestion box on the first floor of the office. The company will designate a person to collect materials and report to the company for processing.

## 12. 通过官方银行渠道的付款

## 12. Payment through the official banking channels



 永兴贵研资源有限公司	内控文件名称:含银原料供应链尽职调查 管理办法	内控版: 第一版
内控文件编号: QB7SJ-LBMA202304	主控部门: 生产技术部	
校准者: 管有祥	生效日期: 2023年01月	

公司应通过合理可用的官方银行渠道收款及付款。公司作为一方的任何现金交易均应有可证实信息, 注明动机并予以佐证, 并由高级管理人员批准。

The Company shall collect and make payments through reasonably available official banking channels. Any cash transaction of the Company as a party shall have verifiable information indicating the motive and evidence and be approved by senior management.

### 13. 与政府部门合作

#### 13. Cooperate with government departments

公司应与政府部门充分并公开合作, 并提供访问相应记录和信息的充分权限。

The Company shall fully and openly cooperate with the government departments, and provide full access to the corresponding records and information.

