

河南豫光金铅股份有限公司

**HENAN YUGUANG GOLD AND LEAD
Co.,Ltd**

LBMA 负责任白银供应链尽职调查

**LBMA Responsible Silver Supply
Chain Due Diligence**

管 理 体 系

Management System

白银供应链尽职调查政策

河南豫光金铅股份有限公司严格遵守《LBMA 负责任白银指南》，并按照其要求建立白银供应链尽职调查管理体系，积极推行白银供应链尽职调查工作，确保白银供应链符合《LBMA 负责任白银指南》的要求。我们将严格禁止供应链有如下行为：

Henan Yuguang Gold and Lead Co., Ltd. strictly abides by the LBMA Responsible Silver Guidance, and establishes a due diligence management system for the silver supply chain in accordance with its requirements. The Company actively promotes due diligence in the silver supply chain to ensure that the silver supply chain meets the requirements of the LBMA Responsible Silver Guidance. We will strictly prohibit the following behaviors in the supply chain:

1. 人权侵犯行为，包括使用童工、酷刑、非人道以及侮辱人格

对待方式、广泛的使用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. Violation of human rights, including the use of child labor, torture, inhuman and degrading treatment, widespread use of violence or other serious forms of forced labor against human right, 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、运输线路的公共或私人安全部队提供直接或间接支持，或在整个供应链内非法征税或敲诈钱财或矿产品（“非法武装组织、公共或私人安全部队”）；

2. Direct or indirect support to illegal armed groups or to public or private security forces that illegally control mining areas, dealers, other intermediaries and transportation routes through the supply chain, or illegal taxation 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原产地；

3. Covering up the origin of silver through bribery or fraud;

4. 为遵照政府有关来自受冲突及高风险区域的矿产品的提取、贸易及出口税费要求；

4. Intention to comply with the Government ’ s tax

requirements for 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 or terrorist financing;

6. 资助冲突;

6. Financing conflicts;

7. 从事高风险经营业务, 例如武器、赌博、古董和艺术品、教派和其领导人;

7. Engaging in high-risk businesses, such as arms, gambling, antiques and works of art, sects and their leaders;

8. 受益人是政治敏感人物或通缉人员;

8. The beneficiary is a politically sensitive person or wanted person;

如果发现供应链中有如上行为, 我们将采取措施, 隔离已采购的产品, 立即暂停或中断与该供应商的任何交易。

If the above behaviors are found in the supply chain, we will take measures to isolate the purchased products and immediately suspend or interrupt any transactions with the supplier.

我们将根据管理体系要求定期评估供应链风险, 建立供应商尽职

调查管理档案，确保供应链持续符合《LBMA 负责任白银指南》的要求。

We will regularly assess supply chain risks according to the requirements of the management system, establish due diligence management files for suppliers, and ensure that the supply chain continuously meets the requirements of the LBMA Responsible Silver Guidance.

河南豫光金铅股份有限公司

Henan Yuguang Gold and Lead Co.,Ltd

2019年4月16日

Date:2019-04-16

一、适用范围

1 Scope of Application

本规定适用于河南豫光金铅股份有限公司以及与河南豫光金铅股份有限公司白银的采购、加工、销售相关的所有供应商及相关合作伙伴（包括白银生产商、中间商、白银交易商、出口商和运输商）。

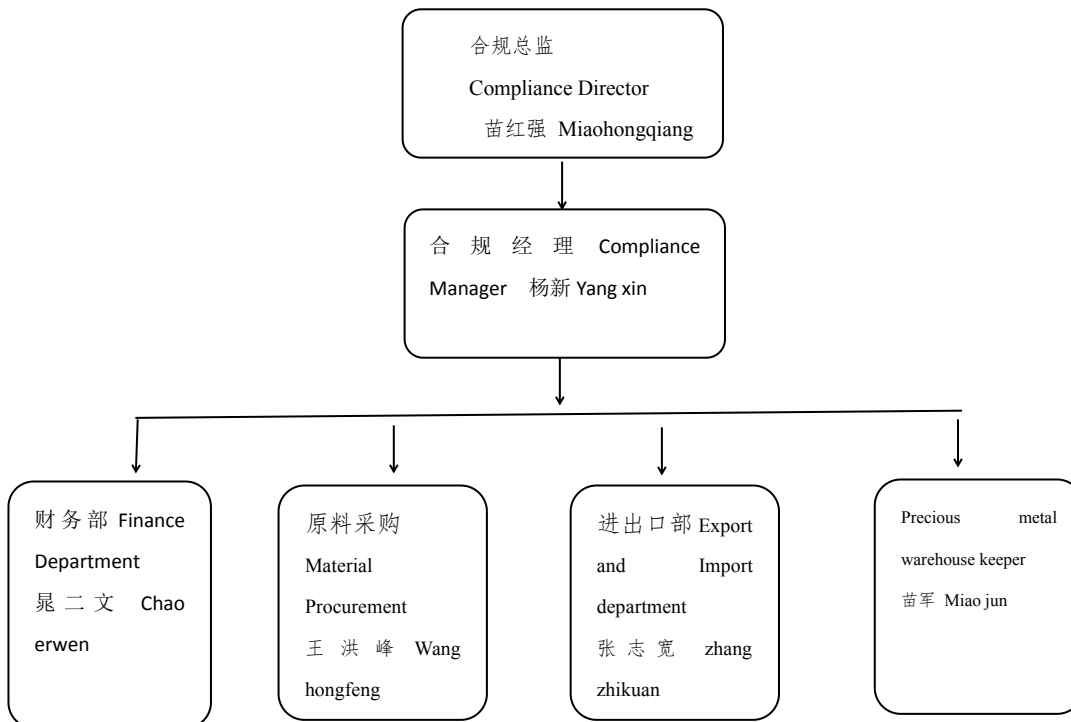
This standard is applicable to Henan Yuguang Gold and Lead Co.,Ltd and all silver suppliers and silver-related partners (including silver producers, middlemen, silver dealers, exporters and transporters) that have silver trading and silver processing with Henan Yuguang Gold and Lead Co.,Ltd

二、白银供应链公司内部组织架构

Organizational Structure

河南豫光金铅股份有限公司为白银供应链尽职调查专门设立了调查管理小组，组织结构如下：

Henan Yuguang Gold and Lead Co.,Ltd has set up a special management team for due diligence of silver supply chain. The organizational structure is as follows:



职责：

Responsibilities:

1、合规总监

1 Compliance Director

合规总监为公司高级管理人员，负责与供应商合作合同的审批，

包含是否与高风险供应商合作，合同签订后对供应商的审查监督。

The compliance director is the senior management of the company, and is responsible for the approval of cooperation contracts with suppliers, including whether to cooperate with high-risk suppliers, and the review and supervision of suppliers after the contract is signed.

2、合规管理员 Compliance administrator

协助高级管理人员全面负责白银供应链尽职调查事务，对白银供应链上的所有事情负责，确保公司整个白银供应链符合风险管理规定，并能有效识别风险、规避风险。负责白银供应链尽职调查及风险控制的培训，起草和更新白银供应链政策，为高级管理者提供准确的信息。

(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。

(2) 如果存在高风险供应链或交易，需要及时向业务分管副总汇报。

(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。

(4) 每年至少一次对重要客户进行现场调查；

(5) 协助与鼓励白银原料供应商及白银交易客户承诺遵守白银供应链尽职规则；

(6) 如出现异常情况需及时向合高级管理者报告。

Assist senior management to be fully responsible for due

diligence of silver supply chain, be responsible for all matters in silver supply chain, ensure that the whole silver supply chain of the company complies with risk management regulations, and can effectively identify and avoid risks. Responsible for silver supply chain due diligence and risk control training, drafting and updating silver supply chain policy, providing accurate information for senior managers.

(1) Have the right to inspect the due diligence process of silver supply chain and evaluate whether the due diligence is fully carried out; if necessary, request additional documents or information.

(2) If there is a high-risk supply chain or transaction, it is necessary to report to the vice president in charge of business in a timely manner.

(3) Regularly train employees on silver supply chain rules, draft and update silver supply chain rules, and provide accurate information for senior management to fulfill their responsibilities.

(4) Conduct on-site investigation on important customers at least once a year;

(5) Assist and encourage silver raw material suppliers and silver trading customers to commit to abide by the due diligence

rules of silver supply chain;

(6) In case of any abnormal situation, it is necessary to report to the senior management in time.

3、原料部及进出口部负责原材料采购，确保矿粉、原材料供应的长期性、稳定性、安全性，并拒绝与高风险地区的相关企业、组织或国家合作。

The raw materials department and the import and export department are responsible for the procurement of raw materials to ensure the long-term, stability and safety of ore powder and raw materials supply, and refuse to cooperate with relevant enterprises, organizations or countries in high-risk areas.

4、财务部合规专员 **Compliance officer, finance 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。

(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；

(2) 如出现异常情况需及时向合规风控官报告。

The compliance officer of the finance department is responsible for the complete preservation of transaction receipts of all customers.

(1) Transaction vouchers include but are not limited to: warehouse in / out documents, customer related legal qualification certificates, etc., and the records shall be kept for at least 5 accounting years;

(2) In case of any abnormal situation, it is necessary to report to the

compliance risk controller in time.

5、贵金属仓库合规专员 Precious metal warehouse compliance officer

(1) 仓库管理员应按照客户进行分类作好白银的入库、出库记录。

(2) 如出现异常情况需及时向合规风控官报告。

(1) The warehouse keeper should classify the silver according to the customers and make a record of the storage and delivery of silver.

(2) In case of any abnormal situation, it is necessary to report to the compliance risk controller in time.

三、管理体系 Management System

1.制定和发布公司关于 LBMA 负责任白银供应链尽职调查政策

Develop and publish the Company ' s due diligence policy on LBMA responsible silver supply chain

1.1 公司关于 LBMA 负责任白银的公告，告知供应链合作方严格遵守公司白银供应链管理制度，并公开接收社会各界及全公司内部员工的监督。

The Company makes Announcement on LBMA Responsible Silver to inform the supply chain partners to strictly abide by the Company ' s silver supply chain management system and publicly accept the supervision of all sectors of society and employees throughout the Company.

1.2 公司白银原料采购承诺，承诺遵守《LBMA 负责任白银指南》，积极参与并支持 LBMA 含银原料的可追溯性工作，严格遵守白银供应链无冲突冶炼厂计划要求，公司不与提供来自冲突影响地区及高风险地区的白银原料供应商进行交易。

For procurement of silver raw materials, the Company undertakes to abide by the LBMA Responsible Silver Guidance, actively participate in and support the traceability of LBMA silver-containing raw materials, strictly abide by the requirements of the Conflict-Free Refiner Plan in Silver Supply Chain, and not to trade with suppliers of silver raw materials from conflict-affected areas and high-risk areas.

2 尽职调查流程 Due diligence process

2.1 在交易前，将公司负责任白银供应地管理政策及要求明确告知对方。

Before the transaction, the Company shall clearly inform the other party of the management policies and requirements of the responsible silver supply place of the Company.

2.2 向供应商、客户发放尽职调查表，具体内容详见尽职调查表，收集相应的资质与资料。

Issue due diligence questionnaires to suppliers and customers. Please refer to the due diligence questionnaires for details to collect corresponding qualifications and data.

2.3 跟踪、收回尽职调查表，并进行风险评估。

Follow up and withdraw the due diligence questionnaire and conduct risk assessment.

2.4 编制尽职调查报告。

Prepare due diligence report.

3 尽职调查内容 Content of due diligence

3.1 尽职调查供应商包括矿产白银供应商、含银物料供应商、再生白银供应商、贸易商、运输商。

Due diligence suppliers include mineral silver suppliers, silver-containing material suppliers, recycled silver suppliers, traders and transporters.

3.2 尽职调查客户包括贸易商、买家等；

Due diligence customers include traders, buyers, etc.

3.3 在采购、销售交易发生前，要了解供应商、客户对于来自受冲突影响、高风险区域及存在的其它风险情况负责的供应链采购、销售情况。

Before purchasing and selling transactions occur, it is necessary to understand the purchasing and selling situation of the responsible supply chain of suppliers and customers from conflict-affected, high-risk areas and other risk situations.

3.4 尽职调查应包含供应链资质情况、白银原料产地识别，采矿与山口许可证，采矿情况信息证明是否侵犯人权、是否违规操作等，开采

能力数据等。

Due diligence shall include supply chain qualification, identification of silver raw material origin, mining and mountain pass license, mining information to prove whether human rights are violated or operations are illegal, mining capacity data, etc.

4 尽职调查措施 Due diligence measures

4.1 建立供应链客商档案。包括名称、法人、地址、联系方式、运营方式、交易合同等。

Establish supply chain customer/supplier files, including name, legal person, address, contact information, operation mode, transaction contract, etc.

4.2 对既有供应链需进行年度评估，如有供应商或客户，需要及时对其进行风险评估，符合体系要求方可进行交易。

Annual assessment is required for the existing supply chain. If there are suppliers or customers, risk assessment is required for them in a timely manner. Transactions can only be conducted if they meet the system requirements.

4.3 确定供应链没有任何的洗钱、诈骗或恐怖主义行为。

Determine that the supply chain is free of any money laundering, fraud or terrorist acts.

4.4 定期获取供应链公司的经营状况及交易目的信息。

Regularly obtain information on the operating status and transaction purpose of supply chain companies.

4.5 针对矿产白银供应商，在交易前，需要获得如下信息：

For mineral and silver suppliers, the following information shall be obtained before trading:

a) 白银的产地来源信息

a) Information on the origin of silver

b) 采矿许可证

b) Mining permits

c) 提供进/出口白银或者精矿许可证

c) Provision of permits for the import/export of silver or concentrate

d) 采矿情况信息证明

d) Proof of mining information

e) 定期对矿产白银客户进行尽职调查

e) Regular due diligence of mineral silver customers

4.6 针对回收白银供应链客商，在交易前，需要获得如下信息：

For customers in the silver recovery supply chain, the following information needs to be obtained before the transaction:

a) 再生白银供应商需提供合法的商业关系，包括再生银来源证明、收益人等信息

a) Suppliers of recycled silver are required to provide legal business relationships, including information such as proof of the source of

recycled silver, beneficiaries, etc.

b) 公司会持续不断的对再生白银客户进行尽职调查

b) The Company will conduct continuous due diligence on recycled silver customers

5 风险评价标准 Risk evaluation criteria

5.1 直接评定为高风险标准

Direct assessment as high risk standard

a) 矿产白银(含银精矿)或再生银的源头、白银销售区域经过或途经冲突影响地区或人权侵犯高风险地区。

a) The source of mineral silver (including silver concentrate) or recycled silver, and the silver sales area goes by or passes through conflict-affected areas or areas with high risk of human rights violations.

b) 矿产白银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。

b) Mineral silver originates from a country with known limited reserves, limited resources or expected limited silver production.

c) 再生白银来自于已知、白银销售至众所周知或被怀疑其白银来自于或途经冲突影响地区和人权侵犯高风险地区。

c) Recycled silver originates from known, sold to known or suspected sources of silver originating from or passing through conflict-affected areas and areas with high risk of human rights violations.

d) 白银供应交易方其他已知上游公司、白银销售客户位于高洗钱风险的国家。 d) Other known upstream companies of the silver supply counterparty, and silver sales customers are located in countries with high money laundering risks.

e) 供应方、其已知上游公司、白银销售客户中对其有重要影响的权益所有者是政治敏感人物。

e) The supplier, its known upstream company, and the owner of the equity that has a significant influence on it among the silver sales customers are politically sensitive figures.

f) 供应商、其已知的上游公司、白银销售客户从事于高风险业务，如武器、博彩业、古董和艺术品、教派和其领导人。

f) Suppliers, their known upstream companies, silver sales customers are engaged in high-risk businesses such as weapons, gambling, antiques and works of art, sects and their leaders.

g) 来自、途经的高风险国家和地区，包括 CFSP 公布的冲突战乱国家和地区、被联合国制裁的国家或地区、FATF 公布的洗钱高风险国家和地区。

g) High-risk countries and regions coming from and passing through, including conflict and war-torn countries and regions announced by CFSP, countries or regions sanctioned by the United Nations, and high-risk countries and regions for money laundering announced by FATF.

5.2 评价方法：以尽职调查表内容为基础，结合实际收到供应商、客

户的对应的资料情况，以各项目的评价标准进行评价打分，最终确定风险等级。

Evaluation method: Based on the contents of the due diligence questionnaire, combined with the corresponding data actually received from suppliers and customers, the evaluation and scoring are carried out according to the evaluation criteria of each project to finally determine the risk level.

5.3 评价标准 Evaluation criteria

a) 风险评价项目详见表《白银供应链尽职调查风险评价标准》(矿产原料类、再生原料类、客户类)。

a) Please refer to the Table Risk Assessment Criteria for Due Diligence Investigation of Silver Supply Chain (Mineral Raw Materials, Recycled Raw Materials and Customers) for details of risk assessment items.

b) 风险等级

b) Risk Level

矿产原料类：评分值(R) ≥ 80 分，低风险；

Mineral raw materials: score (R) ≥ 80 points, low risk;

40 分 $\leq R < 80$ 分，中风险；

40 points $\leq R < 80$ points, medium risk;

R < 40 分，高风险；

R < 40 , high risk;

再生原料类：评分值(R) ≥ 50 分，低风险；

Recycled raw materials: score (R) \geq 50 points, low risk:

30 \leq R<50 分, 中风险;

30 \leq R< 50 points, medium risk;

R<30 分, 高风险;

R < 30, high risk;

客户类: 评分值(R) \geq 50 分, 低风险:

Customer category: score value (R) \geq 50 points, low risk:

30 \leq R<50 分, 中风险;

30 \leq R< 50 points, medium risk;

R<30 分, 高风险;

R<30, high risk;

5.4 应对措施 Response measures

a)低风险: 继续交易, 降低风险。

a) Low risk: continue to trade and reduce risk.

b)中风险: 暂停交易, 直至降低为低风险。

b) Medium risk: Suspend trading until it is reduced to low risk.

与供应商沟通促进其指定和实施改善措施, 在 6 个月之内确认风险符合本规定的要求后继续交易; 如果供应商在 6 个月内拒不提供相关合法性证明文件和整改报告, 那么公司应将其判定为高风险供应链, 停止与其交易。具体要求如下:

Communicate with suppliers to promote them to designate and implement improvement measures, and continue trading after

confirming that the risks meet the requirements of this regulation within 6 months; If the Supplier refuses to provide relevant legality certificates and rectification reports within 6 months, the Company shall determine it as a high-risk supply chain and stop trading with it. The specific requirements are as follows:

对于大规模开采的白银、手工及小型矿开采的白银、再生银：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、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。

For silver mined on a large scale, silver and recycled silver mined by manual and in small mines: Use credible independent source documents, data and information to verify the situation. From mines to refineries, the revenue owner and government monitoring list information of every company in the supply chain (including silver producers, traders, exporters and transporters) are required to be verified.

c)高风险：停止交易，断绝风险，将其列入公司黑名单，3年之内不能与公司交易。

c) High risk: stop trading, cut off risks, put them on the Company's blacklist and prohibit from trading with the company within 3 years.

6 白银供应链尽职调查培训 Due diligence training for silver supply chain

6.1 公司每年会对白银供应链中的员工进行该规定的培训，并将培训

计划纳入年度培训计划当中。

The Company will carry out the specified training for employees in the silver supply chain every year and incorporate the training plan into the annual training plan.

6.2 涉及白银供应链的员工必须参加，并通过培训签到的形式进行相关培训确认。

Employees involved in the silver supply chain must attend for relevant training confirmation through training sign-in.

6.3 采用讲解授课方式，并进行考核。

Adopt the method of explanation and teaching, and conduct assessment.

7 供应链追溯系统 Supply chain traceability system

7.1 建立供应链追溯系统，收集并维护每一精炼批次的供应链信息，包括为每一输入及输出分配一个单独参考编号：

Establish a supply chain traceability system to collect and maintain supply chain information for each refining batch, including assigning a separate reference number to each input and output:

a) 白银产品向上追溯（白银—原料）

a) Upward traceability of silver products (silver-raw material)

- 含银物料类型（矿产白银/再生白银）；

-Silver-containing material type (mineral silver/recycled silver);

- 入库重量和分析报告；

-Warehousing weight and analysis report;

- 原料入库日期和成品入库日期；

-Raw material storage date and finished product storage date;

b) 白银产品向下追溯（白银—顾客）

b) Downward traceability of silver products (silver-customer)

- 顾客信息；

-Customer information;

- 交易重量和分析报告；

-Transaction weight and analysis report;

- 出库日期；

-Outbound delivery date;

8 记录的保留 Retention of Records

8.1 按照 LBMA 要求保留充分的供应链文档记录，以证明已遵照适当及持续的尽职调查。

Maintain adequate supply chain documentation as required by LBMA to demonstrate compliance with appropriate and ongoing due diligence.

8.2 保留供应链追溯系统的记录。

Keep records of the supply chain traceability system.

8.3 记录保存 5 年。

Records shall be kept for 5 years.

9 白银供应链违规行为、事项上报程序

Reporting procedures for violations and events in silver supply chain

9.1 公司白银供应链相关工作人员如发现违规行为、事项，应及时向所在单位、分子公司合规专员进行书而或电话报告，合规专员向所在单位、分子公司分管领导进行报告，同时将发现的违规行为、事项及处理建议及时向公司合规专员报告，公司合规专员向公司白银供应链管理领导小组组长汇报。

If any violations or matters found, the relevant staff of the silver supply chain of the Company shall promptly report in writing or by telephone to the Compliance Officer of their organizations or constituent company. The Compliance Officer shall report to the leaders in charge of the organizations and the constituent company and shall also promptly report the found violations, matters and handling suggestions to the Compliance Officer of the Company. The Compliance Officer of the Company shall report to the leader of the Silver Supply Chain Management Leading Group of the Company.

9.2 发现存在有关白银提取、运输或贸易的系统性或广泛人权侵犯行为，或者供应商向非法的非政府武装组织提供直接或直接支持，或者欺诈掩盖白银的原产地或者存在洗钱或恐怖主义融资等事项时，通报与该供应商解除合同关系，相关业务员立即实施。

In case systematic or widespread human rights violations are found in

relation to the extraction, transportation or trade of silver, or when suppliers provide direct or indirect support to illegal non-governmental armed organizations, or fraudulently cover up the origin of silver or there are matters such as money laundering or terrorist financing, the relevant salesman shall notify the supplier of the termination of the contractual relationship.

9.3 发现可能存在有关白银提取、运输或贸易的系统性或广泛人权侵犯行为，或者供应商向非法的非政府武装组织提供直接或间接支持，或者欺诈掩盖白银的原产地或者存在洗钱或恐怖主义融资等事项时，立即暂停交易，并对供应链客商进行专项调查，结合调查的结果来确定是否继续进行交易。

It is discovered that there may be systematic or widespread human rights violations relating to the extraction, transportation or trade of silver, or when suppliers provide direct or indirect support to illegal non-governmental armed organizations, or fraudulently cover up the origin of silver or there are matters such as money laundering or terrorist financing, the transaction shall be suspended immediately, and a special investigation shall be conducted on supply chain traders to determine whether to continue the transaction in combination with the results of the investigation.

10 白银供应链交易监控

Silver supply chain transaction monitoring

10.1 为确保公司白银供应链交易符合 LBMA 白银负责任指南要求，与公司对于供应链调查评估的风险一致，保证公司白银的来源合规合法，公司应获取收到的每一批原料的相关资料。

The Company shall obtain relevant information on each batch of raw materials received to ensure that the Company's silver supply chain transactions meet the requirements of LBMA Responsibility Silver Guidance, and are consistent with the Company's risks in the supply chain investigation and assessment, and ensure compliant and legal sources of the Company's silver.

10.2 重量和品质数据，运输单据(货运单、航运单、铁路大票、形式发票等)，进出口相关单据，能够获取的其他资料信息。

Weight and quality data, transportation documents (freight bills, shipping bills, railway tickets, pro forma invoices, etc.), import and export related documents, and other information that can be obtained.

10.3 交易过程中出现高风险交易情况，业务人员必须要求客户提供相应资料进行相互印证，核实是否真实相符，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。

In case of high-risk transactions during the transaction, the business personnel must require the customers to provide corresponding information to verify each other, verify whether it is true and consistent, and conduct transaction background investigation at the same time. In

case of inconsistent situations, the business personnel must conduct investigation and obtain written investigation results.

10.4 每年合规专员组织实施 LBMA 负责任白银年度内部合规性审核，并编制年度合规性报告，并向公司 LBMA 负责任白银供应链管理领导小组领导报告。

Every year, the Compliance Officer organizes and implements the annual internal compliance audit of LBMA responsible silver, prepares the annual compliance report, and reports to the leader of the leading group of the Company' s LBMA responsible silver supply chain management.

11 白银供应链第三方审核监督

Third party audit and supervision of silver supply chain

11.1 由指定认可的第三方审计机构开展年度第三方审核，确保持续改进。

An annual third-party audit shall be conducted by a designated and recognized third-party audit institution to ensure continuous improvement.

11.2 针对第三方审核机构在审核过程中提出的风险、问题，涉及白银供应链管理的部门、分子公司，需认真对照问题，制定改进措施、时限、责任人等。

In view of the risks and problems raised by the third-party audit institutions during the audit process, departments and constituent

companies involved in silver supply chain management shall carefully compare the problems and formulate improvement measures, set time limits, assign responsible persons, etc.

12 问责 Accountability

12.1 公司各相关部门、分子公司涉及白银供应链的员工，没有按照本规定要求开展工作，造成不良后果的，根据情节严重情况，依据公司相关问责管理规定进行处理。

If employees of relevant departments and constituent companies of the Company involved in the silver supply chain fail to carry out their work in accordance with the requirements of this Regulation, resulting in adverse consequences, they shall be dealt with according to the relevant accountability management regulations of the Company based on the serious circumstances.

河南豫光金铅股份有限公司

Henan Yuguang Gold and Lead Co., Ltd

2019年4月17日

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