



**河南豫光金铅股份有限公司**

**HENAN YUGUANG GOLD AND LEAD CO., LTD**

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Henan Yuguang Gold and Lead Co., Ltd.

LBMA RSG

2019 Refiner's Compliance Report

(Published in January 2020)

河南豫光金铅股份有限公司

2019 年度精炼厂合规报告

(2019/01/01-2019/12/31)

<b>Company Name:</b>	河南豫光金铅股份有限公司 Henan Yuguang Gold and Lead Co., Ltd.
<b>Location:</b>	No.1 South Jingliang Street, Jiyuan City, Henan Province
<b>Reporting year-end:</b>	December 31th, 2019
<b>Date of Report</b>	November 30 <sup>nd</sup> , 2020
<b>Senior management responsible for this report</b>	Mr. Miao Hongqiang/Compliance Director

## Part I 第一部分

### Purpose 目的

为了符合《伦敦金银市场协会负责的白银指南》的要求，避免任何的系统性或广泛性的侵犯人权行为、避免产生冲突，洗钱和打击恐怖主义融资行为，我司通过建立强大的管理体系，采用供应链尽职调查方法对所有供应商进行风险识别和评估，确保本公司的白银供应链完全符合 LBMA 负责任白银指南的要求。

To comply with the requirements of the London Bullion Market Association's Responsible Silver Guide, avoid any of systemic or widespread human rights violations, conflicts, money laundering and terrorist financing, our company has established a strong management system and using supply chain due diligence methods to identify and evaluate risks for all suppliers, make sure that the company's silver supply chain fully meets the requirements of the LBMA Responsible Silver Guidelines.

本报告总结了河南豫光金铅股份有限公司 2019 财年内(2019 年 1 月 1 日-2019 年 12 月 31 日)对《伦敦金银市场协会负责的白银指南》要求的遵守情况。

This report summarizes the compliance of Henan Yuguang Gold & Lead Co., Ltd. in the fiscal year 2019 (January 1, 2019-December 31, 2019) with the requirements of the < London Bullion Market Association Responsible Silver Guide >.

## Part II 第二部分

### Company Profile 工厂概况

河南豫光金铅股份有限公司是河南豫光金铅集团有限责任公司控股子公司。河南豫光金铅集团有限责任公司始建于 1957 年,是河南济源市全资国有企业。河南豫光金铅股份有限公司 2002 年在上海证券交易所上市,是我国最大的铅冶炼企业、白银、再生铅生产基地。

公司自主研发形成了一批国际领先拥有自主知识产权的核心技术,引领了行业发展,主持和参与了 100 余项国家及行业标准的制修订工作,获得科技成果 200 余项,专利 100 余项,2 项科技成

果获“国家科技进步二等奖”。

公司的电铅、白银、再生铅等多种主要产品生产规模位居行业领先地位，YUGUANG 商标获中国驰名商标，公司主导产品“豫光”牌电解铅、白银、阴极铜分别在伦敦金属交易所（LME）、伦敦贵金属协会（LBMA）和上海期货交易所注册，YG 牌 A 级铜在上海交易所注册成功。公司主要产品生产能力为：铅 45 万吨、铜 15 万吨，黄金 10 吨、白银 1000 吨、硫酸 110 余万吨。

2006 年至今，豫光上交税收 60 余亿元，实现利税 100 余亿元，资产总额由建厂初期国家投资的 4.58 亿元，滚动发展到目前的近 200 亿元。公司连续 11 年跻身“中国企业 500 强”“中国制造业 500 强”，第十次跻身“财富中国 500 强”行列。

Henan Yuguang Gold & Lead Co., Ltd. is a holding subsidiary of Henan Yuguang Gold & Lead Group Co., Ltd. Which was founded in 1957, Henan Yuguang Gold & Lead Group Co., Ltd. is a state-owned enterprise in Jiyuan City, Henan Province. Henan Yuguang Gold & Lead Co., Ltd. was listed on the Shanghai Stock Exchange in 2002 and is the largest lead smelting enterprise, silver and recycled lead production base in China.

The company's independent research and development has formed a group of internationally leading core technologies with independent intellectual property rights, leading the development of the industry, participated in the preparation and revision of more than 100 national and industry standards, obtained more than 200 scientific and technological achievements, and more than 100 patents, two scientific and technological achievements won the "National Science and Technology Progress Second Prize".

The production scale of the company's main products such as electric lead, silver, recycled lead and other leading products ranks the industry's leading position. The YUGUANG trademark has won the well-known trademark in China. The company's leading products "Yuguang" brand electrolytic lead, silver and copper cathode are respectively on the London Metal Exchange (LME), London Precious Metals Association (LBMA) and Shanghai Futures Exchange registered, YG brand A grade copper was successfully registered on the Shanghai Stock Exchange. The company's main product production capacity is: 450,000 tons of lead, 150,000 tons of copper, 10 tons of gold, 1000 tons of silver, and more than 1.1 million tons of sulfuric acid.

Since 2006, Yuguang has paid more than 6 billion yuan in taxes and realized more than 10 billion yuan in profits and taxes. Its total assets have grown from 45,800 yuan invested by the state at the initial stage of the factory to nearly 20 billion yuan. The company has been ranked among the "Top 500 Chinese Enterprises" and "Top 500 Chinese Manufacturing Enterprises" for the 11th consecutive year, and ranked among the "Top 500 Fortune China" for the tenth time.

## Part III 第三部分

### Summary of compliance activities 合规活动总结

#### 第 1 步：建立强有力的公司管理体系

#### Step 1: Establish strong company management systems

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合规声明：

我方部分符合第1步：建立强有力的公司管理体系，经公司于2020年6月11日，采取整改措施后，不符合均已关闭，目前全部符合。

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**Compliance Statement:**

**In the year ended Dec. 31<sup>st</sup> 2019, we are partly complied with the requirement of Step 1: Establish strong company management systems. From June 11, 2020, we have taking rectification measures, all discrepancies were closed and all of them are in conformity**

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**公司政策 Company Policy:**

合规陈述:

公司于 2019 年 4 月 17 日发布了《白银供应链尽职调查管理体系》以及《白银供应链风险减缓管理办法》，我司的白银供应链政策严格禁止白银供应商有如下行为：

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；
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”）；
3. 通过贿赂或欺诈掩盖白银原产地；
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；
5. 洗钱或恐怖主义融资；
6. 资助冲突；
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；
8. 受益人是政治敏感人物或通缉人员；

《白银供应链尽职调查管理体系》中规定了内部的组织构架及责任、白银供应链尽职调查规定、白银供应链的风险识别方法和评判标准、交易监控、文件保存、培训以及报告机制。

2019 年度，我司严格按照体系要求完成所有白银供应商尽职调查，并进行风险识别和评估，有效的管控了白银供应链的风险。

同时，公司也将该政策发布在官方网站上，网址为 <http://www.yggf.com.cn/>

**Compliance statement:**

The company issued the "Silver supply chain due diligence management system" and "Silver Supply Chain Risk Mitigation Management Measures" on April 17, 2019. Our silver supply chain policy strictly prohibits silver suppliers from the following behavior:

1. Systematic or widespread human rights abuses associated with the extraction, transport or trade of silver, including worst forms of child labour, any forms of torture, inhuman and degrading treatments, widespread sexual violence or other gross human rights violation forced or compulsory labour, war crimes, crimes against humanity or genocide;
2. Direct or indirect support to illegitimate non-state armed groups, public or private security forces which illegally control mines sites, traders, others intermediaries, transport routes through the supply chains or illegally tax or extort money or minerals through the supply chains;
3. Bribery and fraudulent misrepresentation of the origin of silver;
4. Non-compliance with taxes, fees and royalties due to Governments related to mineral extraction, trade and export from conflict affected and high-risk areas;

5. Money laundering or terrorism financing;
6. Contribution to conflict;
7. Higher-risk business activity such as arms, gaming and casino industry, antiques and art, sects and their leaders;
8. Upstream companies or their beneficial owners with significant influence are PEPs;

The "Silver supply chain due diligence management system" stipulates the internal organizational structure and responsibilities, silver supply chain due diligence methods, silver supply chain risk identification methods and judgment standards, transaction monitoring, document storage, training and reporting mechanisms.

In 2019, our company completed the due diligence of all silver suppliers in strict accordance with the requirements of the system, and conducted risk identification and evaluation to effectively control the risks of the silver supply chain.

At the meanwhile, the company also posted the policy on the official website at <http://www.yggf.com.cn/>

### **内部管理架构 Internal management structure**

合规陈述:

公司根据《白银供应链尽职调查规则》建立内部管理体系，明确了管理岗位以及对应的职责，公司设置了一名合规总监，六名合规专员。公司的合规总监由苗红强（财务总监）担任，合规专员由杨新（进出口部部长）担任，原料部合规专员由王洪峰（原料采购员）担任，进出口部合规专员由张志宽（进出口业务员）担任，财务部合规专员由晁二文（白银业务员）担任，冶炼厂合规专员由张敏（贵冶厂主管）担任，仓库合规专员由苗军（贵金属仓库主管）担任。

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。

合规专员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。

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。

财务的合规专员职责为完整保存所有客户的交易凭证。

冶炼厂合规专员组织白银投料生产做好投料记录，在生产过程中采用封闭式流程，确保白银生产加工的安全性与可追溯性。

仓库合规专员应按照客户进行分类作好白银的入库、出库记录。

2019年，豫光集团严格执行《白银供应链尽职调查管理体系》，对供应商进行风险尽职调查。对所有交易进行监控，以避免与高风险供应商建立关系。同时，合规官员对所有尽职调查发现和结果进行审查，所有的银物料采购合同都经过了合规总监的审批。

Compliance statement:

The company established an internal management system in accordance with the "Silver Supply Chain Due Diligence Rules", clarified management positions and corresponding responsibilities, and the company set up a compliance risk control director and five compliance officers.

The company's compliance director is Mr. Miao Hongqiang (CFO), the compliance officer is Mr. Yang Xin (Director of import and Export Department), the raw materials department compliance officer is Mr. Wang Hongfeng(material purchaser), the import and export department compliance officer is Mr. Zhang

Zhikuan (business manager), Mr. Chao Erwen (Silver business manager) is the compliance officer of the Finance Department, and Mr. Zhang Min(refiner plant manager) is the compliance officer of the refiner plant, Mr. Miao Jun is the compliance officer of warehouse.

The Compliance Director is the company's senior management personnel and is responsible for the review and approval of cooperation contracts with suppliers, including whether to cooperate with high-risk suppliers.

The compliance officer shall assist senior management personnel to be fully responsible for the due diligence of the silver supply chain, to be responsible for everything in the silver supply chain, to ensure that the company's entire silver supply chain complies with risk management regulations, and can effectively identify risks and avoid risks.

Responsible for silver supply chain due diligence and risk control training, drafting and updating silver supply chain policies, and providing accurate information for senior managers.

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 the supply of mineral powder and raw materials, and refuse to cooperate with relevant enterprises, organizations or countries in high-risk areas.

The responsibility of the financial compliance officer is to keep all transaction documents intact.

The smelter's compliance officer organizes the production of silver input materials and makes a record of input materials. A closed process is used in the production process to ensure the safety and traceability of silver production and processing.

The warehouse compliance officer shall classify and record silver in and out according to the customer.

In 2019, Yuguang Group strictly implemented the "Silver Supply Chain Due Diligence Management System" and conducted risk due diligence on all suppliers. Monitor all transactions to avoid establishing relationships with high-risk suppliers. At the same time, compliance officers review all due diligence findings and results, and all silver material procurement contracts have been approved by the compliance director.

## **可追溯系统和其他供应链参与者的识别 Traceability and identification of other supply chain actors**

合规陈述:

公司根据管理体系要求,建立了供应链追溯系统,收集并维护每一批次的供应链信息,包括为每一输入及输出分配一个单独参考编号:

白银产品向上追溯(白银->原料)

- 含银物料类型(矿产白银/再生白银);
- 入库重量和分析报告;
- 原料入库日期和成品入库日期;

白银产品向下追溯(白银->顾客)

- 顾客信息;
- 交易重量和分析报告;
- 出库日期;

根据保留的所有记录,可以完成从成品追溯到原料、从原料追溯到成品,并能追溯每个供应商每批产品的采购合同,根据合同内容可以追溯包括贵金属类型、采购重量、分析报告以及相关尽职调查文件等信息。

Compliance statement:

According to the requirements of the management system, the company has established a supply chain traceability system to collect and maintain each batch of supply chain information, including assigning a separate reference number for each input and output:

Silver product traceability (Silver -> Raw material)

-Types of silver-bearing materials (mineral silver/recycled silver);

-Storage weight and analysis report;

-Raw material storage date and finished product storage date;

Silver product traceability (Silver-> Customer)

-Customer information;

-Transaction weight and analysis report;

-Date of delivery;

According to all the records kept, traceability can be completed from finished product to raw materials, from raw materials to finished products, and can be traced to the purchase contract of each supplier and each batch of products. According to the content of the contract, the traceability includes the type of precious metal, purchase weight, analysis report and related information such as due diligence documents.

**交易方互动，并协助交易方建立尽职调查能力 Engagement with silver supplying counterparties, and where possible, assisted silver supplying counterparties in building due diligence capabilities**

合规陈述:

在与供应商签订合同时，原料部、国内及国际业务部门业务人员依据管理体系要求，与所有白银供应合约对方签署《LBMA 合规承诺书》，并进行《问卷调查》以确保他们了解公司 LBMA 管理的要求、供应链政策以及所要求的承诺。在该承诺书中，白银供应合约对方应以书面形式承诺并承认，不存在与矿产开采、运输或贸易有关的严重侵犯人权行为，没有直接或间接支持非国家武装组织，没有直接或间接支持公共或私人安全部队，没有贿赂或虚假误报矿产来源，没有洗钱。此外，还向政府支付与受冲突影响地区和高风险地区的矿产开采、贸易和出口有关的税费和特许权使用费。

2019 年度签约的所有供应商均签署了相关的承诺书。

2019 年度审计，发现一个有关供应商承诺方面的问题点。查阅 29 家供应商的承诺书，都没有签订日期。我公司在 2020 年 7 月 15 日前与 29 家供应商重新签署了承诺书，并附带日期，关闭了不符项内容。

Compliance statement:

When signing a contract with a supplier, according to the requirements of the management systems, the business personnel of the domestic and international business departments signed the "LBMA Compliance Commitment" with all counterparties of the silver supply contract, and conducted a "questionnaire survey" to ensure suppliers understand the company's LBMA management requirements, supply chain policies and required commitments.

In the commitment, the counterparty of the silver supply contract shall commit in writing and acknowledge that there are no serious human rights violations related to mineral extraction, transportation or trade, no direct or indirect support for non-state armed organizations, and no direct or indirect support for public or private security forces, did not bribe or falsely misreport mineral sources, and did not launder money. In addition, the government is also paid taxes and royalties related to mineral

extraction, trade and export in conflict-affected areas and high-risk areas.

In 2019, All suppliers have signed the commitments.

In the audit of 2019, we found a problem about supplier commitment. Check all suppliers 2019 yearly agreement announce letter, no sign date. We resign the agreement announce with all 29 supplier before July 15, 2020, that with sign date, and the discrepancies were closed.

### **交易监控 Transaction monitoring**

### **交易监控 Transaction monitoring**

合规陈述:

公司所有关于白银的收付款，都是通过公司在银行的账户进行交易，没有现金交易。这些收付款都受到银行及国家财税部门的监督，并且每年进行财务审计。

根据管理体系要求，对白银供货商供应链上的风险进行交易监督。精炼厂对收到的每批产品接收货运单据，重量单据，检验报告，发票，转账记录等文本进行检查。合规专员负责交易监控工作，对不符或以任何形式疑似不符的交易背景进行检查，并书面确认调查结果，报告给合规总监。2019 年度的交易全部采用银行转账方式，没有现金转账。

Compliance statement:

All the company's silver receipts and payments are conducted through the bank account, no cash transaction. These receipts and payments are subject to the supervision of banks and the State Finance and Taxation Department, and financial audits are conducted annually.

According to the requirements of the management system, ensure that the risk of the silver supplier's supply chain is monitored. The company checks each batch of products received for shipping documents, weight documents, inspection reports, invoices and transaction records. The Compliance Specialist is responsible for transaction monitoring, checks the background of the transaction that is inconsistent or suspected of being inconsistent in any form, confirms the investigation results in writing, and reports to the Compliance Director. All transactions in 2019 are conducted by bank transfer, and no cash payment.

### **沟通和申诉机制 Communication & Complaint mechanism**

合规陈述:

公司建立了申诉机制，合规专员的电子邮件和联系方式均发布在官方网站上，网址为 <http://www.yggf.com.cn/>，并且申诉机制在含银物料采购过程中均向供应商进行了必要的沟通，内外利益相关方可以匿名举报有关白银交易过程中的违规行为。工厂设立了意见箱，作为内部员工的举报途径，并由相关人员定期开箱检查汇总举报内容。2019 年度没有举报事件发生。

此外，公司也制定了保护举报人制度，防止对举报人进行打击报复，有效保护举报人的权益。

Compliance statement:

The company has established a grievance mechanism. The email and contact information of the compliance officer are posted on the official website at <http://www.yggf.com.cn/>, and the grievance mechanism is carried out with suppliers during the procurement of silver-bearing materials, internal and external stakeholders can anonymously report violations in the silver transaction process. The factory has set up a suggestion box as a way for internal employees to report, and related personnel regularly open the box to check and summarize the content of the report. There was no reporting in the year of 2019.

In addition, the company has also established a whistleblower protection system to prevent retaliation against whistleblowers and effectively protect the rights of whistleblowers.

## 培训 Training

合规陈述:

公司定期组织所有关于白银相关部门进行培训，2019 年度进行了 1 次培训。

1. 2019 年 04 月 22 日，LBMA 负责人采购体系文件要求对供应商调查程序、风险登记评价及应对措施培训；

培训后进行了效果评价，并且保留培训记录。

Compliance statement:

The company regularly organizes silver relevant departments to carry out the training, and once training was performed in 2019.

1. April 22<sup>nd</sup>, 2019, LBMA responsible sourcing management requirement training about supplier due diligence investigation, risk assessment and action.

After the training, the effectiveness evaluation was carried out and the training records were kept.

## 记录保留 Records keeping

合规陈述:

根据公司<白银供应链尽职调查管理体系>要求，所有供应商相关文档，包括尽职调查文件、风险评估表、合规文件、合同文本、检验记录以及出入库记录等至少保存五年。

Compliance statement:

According to the management system requirements, all supplier-related documents, including due diligence documents, risk assessment forms, compliance documents, contract texts, inspection records, and warehouse records are kept for at least five years.

## 第 2 步：识别和评估供应链风险

### Step 2: Identify and assess risks in the supply chain

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合规声明:

我方部分符合第2步：识别和评估供应链风险.经公司于2020年6月11日，采取整改措施后，不符合均已关闭，目前全部符合。

**Compliance Statement:**

**In the year ended Dec. 31<sup>st</sup> 2019, We are partly complied with Step 2: Identify and assess risks in the supply chain. From June 11, 2020, we have taking rectification measures, all discrepancies were closed and all of them are in conformity.**

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供应链风险识别 Identify risks in the supply chain

合规陈述:

《白银供应链尽职调查规则》中规定了供应商风险识别方法,涵盖了含银物料从原产地到精炼厂的所有风险,通过《供应商尽职调查表》识别如下风险,如供应商基本信息、受益人、原产地信息、负责责任的贵金属供应链政策、运输过程、反洗钱反资助恐怖主义、贿赂和欺诈、人权侵犯行为、交易监控、支持非政府武装组织等。

识别方法包括,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;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;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;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;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。

2019 年度审计,发现一个问题点。公司无法提供证据以供检查受益所有人的身份,检查对方及其受益所有人是否未在任何政府名单上列出通缉洗钱者,已知欺诈者或者恐怖分子。我公司在 2020 年 7 月 30 日前重新调查所有受益人身份,确定对方及其受益人否未在任何政府名单上列出通缉洗钱者,已知欺诈者或者恐怖分子,关闭了不符项内容。

Compliance statement:

The Silver Supply Chain Due Diligence Rules specifies the supplier risk identification method, covering all risks of silver-bearing materials from the origin to the refinery. The following risks are identified through the "Supplier Due Diligence Form", such as supplier basic information, beneficiaries, origin information, responsible precious metal supply chain policy, transportation process, anti-money laundering and anti-financing terrorism, bribery and fraud, human rights violations, transaction monitoring, support for non-governmental armed organizations, etc.

Identification method including, Establishing supply chain customer files, including: company name, legal representative, address, contact information, operation method, production method, transaction contract, etc.; Existing supply chain customers need to be checked regularly. If there are new or any changed, we need to check their archives in time to keep the archives database up to date. Identify each customer, business and business owner, and use reliable independent source documents, data or information to verify their identity. Make sure that every customer, business and business owner in the supply chain is not on any government money laundering, fraud or terrorism wanted list. Regularly obtain the commercial and financial details of customers in the supply chain, the purpose of engaging in silver transactions, and the status of commercial operations.

In the audit of 2019, we found a problem that no evidence shows the supply chain due diligence identified the beneficial owner,checked that the counterparty and beneficial owners are not named on any government lists for wanted money launderers,known fraudsters or terrorist.

Before July 30,2020,We check all beneficial owners again,check that counterparty and beneficial owners are not named on any government lists for wanted money launderers,known fraudsters or terrorist.and the discrepancies were closed.

## 供应链风险评估 Risk assessment in the supply chain

合规陈述:

在与供应商业务关系建成之前,业务部门需要填写《白银供应链尽职调查表》,依据《白银供应链

尽职调查规则》，针对所有的含银物料，进行风险评估。

矿产银：供应商需要提供含银物料产地信息、采矿证许可证、进出口许可证、采矿情况信息证明、尽职调查文件、此外还应收集营业执照，受益人，资信，财务信息，是否在政府的洗黑钱、已知诈骗分子或恐怖分子名单内等，部分供应商由合规专员到现场调查信息的真实性，以确保评估准确可靠。

我司没有再生银产品的采购。

高风险供应链评估标准如下：

- 1、矿产银或再生银来源于、中转或者运经冲突影响或侵犯人权高风险地区。
- 2、矿产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。
- 3、再生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。
- 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。
- 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。
- 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。
- 7、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。

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。

2019 年对所有含银物料供应商进行了评估，共计 24 家。其中国内 17 家，国外 7 家。根据评估结果，所有的供应商均判定低风险供应商。

2019 年度审计，发现一个有关供应商尽职调查方面的问题点。查阅的供应商有 5 家无尽职调查资料，无承诺书、无风险评估等级。3 家无尽职调查表。我公司在 2020 年 7 月 20 日前已经完成了对 8 家的尽职调查，并关闭了不符项内容。

Compliance statement:

Before the business relationship with the supplier is established, the business department needs to fill out the "Silver Supply Chain Due Diligence Form" and conduct a risk assessment of all silver-containing materials in accordance with the "Silver Supply Chain Due Diligence Rules".

Mineral gold: Suppliers need to provide information on the origin of silver-bearing materials, mining licenses, import and export licenses, mining information certifications, due diligence documents, in addition to collecting business licenses, beneficiaries, credit, financial information, whether it is in the government In the list of money laundering, known fraudsters or terrorists, some suppliers are inspected by the compliance officer to verify the authenticity of the information on the spot to ensure that the assessment is accurate and reliable.

Our company does not purchase recycled silver products.

The evaluation criteria of the high-risk supply chain are as follows:

1. Mineral silver or reclaimed silver originates from, transits through, or passes through conflict-affected or high-risk areas that violate human rights.
2. Mineral silver claims to originate from a country with known limited reserves, limited resources, or limited silver production.
3. Recycled silver comes from a known high-risk area affected by conflicts and human rights violations, or there is reason to suspect a transit through this area.
4. Companies in the silver supply chain or other known upstream companies are located in a country with a high risk of money laundering, crime and corruption.
5. The owners of the companies in the silver supply chain or other known upstream companies are

politically sensitive figures.

6. Companies in the silver supply chain or other known upstream companies are actively involved in high-risk business activities such as weapons, gambling, gambling, antiques and artwork, diamonds, religion and religious leaders.

7. From and passing through high-risk countries and regions, including conflict and war countries and regions announced by CFSP, countries or regions sanctioned by the United Nations, and high-risk money laundering countries and regions announced by FATF.

Evaluation method: Based on the content of the due diligence form, combined with the actual data received from the suppliers and customers, the evaluation is scored according to the evaluation criteria of each item, and the risk level is finally determined.

In 2019, all suppliers of silver-containing materials were evaluated, a total of twenty-four. Among them, seventeen are domestic and seven are foreign. According to the assessment results, all suppliers are judged at low-risk level.

We partially complied with the requirements, but subsequently rectified and closed the non conformance items

In the audit of 2019, we found a problem about supplier due diligence.

Checked 5 suppliers no supply chain due diligence report, no agreement announce letter, no risk level approval. Checked 3 suppliers no supply chain due diligence report.

We have finish the diligence report with these 8 suppliers before July 20, 2020, and the discrepancies were closed.

### 风险评估结果的汇报 **Report risk assessment to the designated manager**

合规陈述:

合规专员每季度代表高级管理团队向合规总监和最高管理层提供一份评论报告。高级管理层保留对白银供应链的最终控制权和责任。如果高风险供应商，必须得到最高管理层的批准，并立即停止合作。

Compliance statement:

The Compliance officer provides a commentary report to compliance director and senior management on a quarterly basis, senior management retains the ultimate control and responsibility for the silver supply chain, if any high risk suppliers, it must be approved by senior management and stop the business immediately.

### 第 3 步: 对已识别的风险实施管理策略

#### **Step 3: Design and implement a management system to respond to identified risks**

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合规声明:

我们部分符合第三步: 设计和实施一项管理策略应对已识别的风险. 经公司于2020年6月11日, 采取整改措施后, 不符合均已关闭, 目前全部符合。

**Compliance Statement:**

**In the year ended Dec. 31<sup>st</sup> 2019, We are partly complied with Step 3: Design and implement a management system to respond to identified risks. From June**

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**11,2020,we have taking rectification measures, all discrepancies were closed and all of them are in conformity.**

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**针对已识别的风险实施一项风险管理策略 a strategy for risk management of an identified risk**

合规陈述

(i) 在继续交易时缓解风险：当对供应商的评估处于低风险时，我们继续从该供应商获得银原料，在合作过程中，逐步对其调查资料进行完善，并逐步协助供应商建立他们的尽职调查体系，帮助他们建立、完善风险管控中的不足。

(ii) 在暂停交易时缓解风险：当评估结果为中风险时，暂停合作，并调查该可疑风险，直至确定该供应商为低风险供应商。同时隔离来料。公司的白银库房设置有高风险来料隔离区，以应对突发状况。在 6 个月的期限内，供应商整改该风险项，解除风险，则恢复交易，如整改达不到要求或者无法解除风险，则停止与该供应商合作。

(iii) 停止交易脱离风险：对供应商的评估为高风险，或者与供应商合作时发现高风险项目，则停止与其合作，将评估报告及高风险项汇报给最高管理层，将其列入公司黑名单，3 年之内不能与公司交易。

Compliance statement:

(I) Mitigating risks when continuing to trade: when the evaluation of the supplier is at low risk, we continue to purchase the silver raw materials from the supplier, and in the meanwhile, we will gradually improve the investigation data during the cooperation process, and gradually assist the supplier to establish their due diligence system, help them establish and improve their deficiencies in risk management and control.

(li) Mitigating risks when trading is suspended: When the evaluation result is medium risk, the cooperation is suspended and the suspicious risk is investigated until the supplier is determined to be a low-risk supplier. Also isolate incoming materials. The company's silver warehouse has a high-risk incoming material isolation area to cope with unexpected situations. Within 6 month period, the supplier rectifies the risk item and removes the risk, then resumes the transaction. If the rectification fails to meet the requirements or the risk cannot be removed, the cooperation with the supplier is stopped.

(lii) Stop trading out of risk: the supplier is evaluated as high risk, or if a high-risk item is found when working with the supplier, then stop the cooperation, report the evaluation report and high-risk items to the top management, and add it to the company's blacklist, stop the trading within 3 years.

**量化措施, 绩效监督, 重新评估以及定期汇报 Measureable steps, monitoring of performance, periodic reassessment, regular reporting to designated senior management.**

合规陈述:

《白银供应链尽职调查规则》中规定了供应链评估量化管理方式，风险等级如下：

矿产原料类：评分值(R)≥80 分，低风险；

40 分≤R<80 分，中风险；

R<40 分，高风险；

再生原料类：评分值(R)≥50 分，低风险；

30≤R<50 分，中风险；

R<30 分，高风险；

客户类: 评分值(R)≥50 分, 低风险;

30≤R<50 分, 中风险;

R<30 分, 高风险;

如果尽职调查的结果是低风险, 该公司在规定的时间内采取了明确绩效目标的改进策略, 我们将继续从其处获取白银原料。如果白银供应链尽职调查结果是中风险或高风险, 这说明可能存在洗钱、恐怖主义融资、助长冲突、侵犯人权的行为, 或者存在这种情况的可能性很高, 我们将立即停止从其处获取白银原料, 直到提供的信息或数据表明其低风险水平。

根据 2019 年的尽职调查结果, 无供应商需要进行风险缓解的管理策略。

定期重新评估与持续监控: 1、每年, 原料采购部门的合规专员组织人员收集供应商信息的所有变更情况, 持续监控交易结果并进行年度供应链尽职调查重新评估, 以决定是否继续合作。2、采购的每一批次的白银原料在运输、出入库、生产、付款过程都有合规专员的监控。

定期报告: 每季度合规专员根据 LBMA 管理的实际情况, 向合规总监和最高管理层提交汇报。报告本季度 LBMA 管理体系运行情况进行总结, 提出不足及改进措施。

2019 年, 我司采取了量化的手段对供应商进行评分管理, 对除新供应商外的所有供应商进行年度补充风险评估。合规总监已对评估结果进行审核。并且每季度向最高管理层提交了报告。

查阅了 29 家供应商的 2019 年度风险评估等级记录, 没有合规总监的签字和日期。我公司于 2020 年 6 月 30 日前重新由合规总监签字批准全部 29 家供应商的风险等级并附带日期, 关闭了不符项内容。

Compliance statement:

The "Silver Supply Chain Due Diligence Rules" stipulates the Measureable steps method of supply chain assessment.

Mineral silver: score value (R) ≥ 80 points, low risk;

40 points≤R<80 points, medium risk;

R <40 points, high risk;

Recycle silver: score value (R) ≥50 points, low risk:

30≤R<50 points, medium risk;

R <30 points, high risk;

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

30≤R<50 points, medium risk;

R <30 points, high risk;

If the result of due diligence is low risk, the company has adopted an improvement strategy with clear performance goals within the specified time frame, we will continue to obtain silver raw materials. If the silver supply chain due diligence results are medium risk or high risk, it indicates that there may be money laundering, terrorist financing, conflict promotion, human rights violations, or the probability of high-risk, we will immediately stop obtaining silver raw materials until the evidence submitted by suppliers indicate its low risk level.

According to the results of the due diligence in 2019, no supplier needs a risk mitigation management strategy.

Regular re-evaluation and continuous monitoring: 1. Every year, the Compliance officer of the raw material procurement department organizes personnel to collect all changes in supplier information, continuously monitor the transaction results and conduct an annual supply chain due diligence re-evaluation to decide whether to continue cooperation. 2. Each batch of purchased silver raw materials

is monitored by a compliance officer during the transportation, storage, production, and payment process.

Periodic report: Every quarter, the compliance officer submits reports to the compliance director and top management according to the actual situation of LBMA management. The report summarizes the quarterly operation of the LBMA management system, proposes deficiencies and improvement measures. In 2019, our company took a quantitative approach to score management of suppliers, and conducted an annual supplementary risk assessment of all suppliers except new ones. The compliance director has reviewed the evaluation results. And every quarter to submit a report to the top management.

In the audit of 2019, we found a problem about risk level report. Checked all 29 suppliers 2019 yearly risk level approval records, no compliance officer's sign and date.

We have approval all 29 suppliers' level risk with compliance officer's sign and date before June 30, 2020, and the discrepancies were closed.

#### 第 4 步：安排独立的第三方审计

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

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合规声明：

我们完全符合第四步：安排独立的第三方审计

**Compliance Statement:**

**We have fully complied with Step 4: Arrange for an independent third-party audit of the supply chain due diligence.**

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合规陈述：

上一次审计时间为 2019 年 3 月，审核报告已经上传至我司官方网站 <http://www.yggf.com.cn/>。本年度我司按时编写了截至 2019 年 12 月 31 日的合规报告，请必维认证（北京）有限公司进行合理鉴证。

Compliance statement:

The last audit was performed in March 2019, and the audit report has been uploaded to our official website <http://www.yggf.com.cn/>.

We have prepared the annual compliance report before December 31, 2019. And request Bureau Veritas (Beijing) Co., Ltd. for reasonable verification.

#### 第 5 步：供应链尽职调查报告

##### **Step 5: Report on supply chain due diligence**

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合规声明：

我们完全符合第五步：供应链尽职调查报告

**Compliance Statement:**

**We have fully complied with Step 5: Report on supply chain due diligence**

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合规陈述：

我们的白银供应链政策中列出了有关如何实施供应链尽职调查政策，程序，过程和控制以符合 LBMA

负责任白银指南中特定要求的更多信息和具体细节，该政策可在公司网站 <http://www.yggf.com.cn/> 上找到。

Compliance statement:

Further information and specific details of how to perform due diligence systems for supplier chains, procedures, processes and controls have been implemented to align to the specific requirements in the LBMA Responsible Silver Guidance have been set out in our silver supply chain policy, which is available on our company website <http://www.yggf.com.cn/>.

## Part IV 第四部分

### Conclusion 结论

#### 管理层结论 Management conclusion

我司在截至 2019 年 12 月 31 日的报告年度报告中，实施了有效的管理系统，程序，流程和实践，以符合 LBMA 负责任白银指南的要求。

我司致力于持续改进，并且将定期对内部发现的所有纠正措施进行监控。持续满足 LBMA 负责任白银指南的要求。

The company implemented effective management systems, procedures, processes and practices to conform to the requirements of the LBMA Responsible Silver Guidance, as explained above in Table 2, for the reporting year ended 31 December 2019.

The company is committed to continuous improvement, and any corrective actions identified will be monitored internally on a regular basis. Ensure that the management system continue meeting the requirements of the LBMA Responsible Siler Guidance.

#### 其他 Other report comments

如果本报告的使用者希望就本报告向我方提供任何反馈，请随时拨打电话+86-3916665799 或发送电子邮件至 [ygzhangzhikuan@163.com](mailto:ygzhangzhikuan@163.com) 与我们联系。

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