豫光金铅 YUGUANG GOLD & LEAD	文件名称：供应链风险减缓管理办法 File Name:Supply Chain Risk Mitigation Management Measures	版本号：第二版 Version number:second edition
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供应链尽责管理工作组 Supply Chain Responsibility Management Working Group		

供应链风险减缓管理办法

Supply Chain Risk Mitigation Management Measures

为了严格遵守国家关于职工权利、环境保护、公平交易等各项法律法规，积极参与矿产供应链尽职调查工作，以确保黄金、白银、铅锭和阴极铜原料来源的合法性。根据《OECD 关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》、《伦敦贵金属市场协会（LBMA）负责任黄金白银指南》、《CCCMC 中国矿产供应链尽责管理指南》的要求，特制定供应链风险减缓管理办法。

In order to strictly abide by all national laws and regulations regarding employee rights, environmental protection, fair trade, etc., and to actively participate in the due diligence work of the mineral supply chain, in order to ensure the legality of the sources of gold, silver, lead ingots and cathode copper raw materials. In accordance with the requirements of the *OECD Guidelines on Due Diligence in Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, the *LBMA Responsible Gold and Silver Guidelines*, and the *CCCMC Guidelines for Due Diligence Management in China's Mineral Supply Chain*, this special management method for mitigating supply chain risks has been formulated.

1. 范围

1. Scope

本办法适用于河南豫光金铅股份有限公司（以下简称"公司"） 根据矿产供应链尽责管理政策已识别的所有风险。本办法所涉及的来源包括矿产铅、铜、金银，再生铅、铜、金银、阳极泥、粗铅及其他原辅料，2018 年 1 月 1 日后生产的各种形式的库存黄金、白银。

These Measures apply to all risks identified by Henan Yuguang Gold & Lead Co., Ltd. (hereinafter referred to as the "Company") in accordance with its Mineral Supply Chain Due Diligence Policy. The materials covered herein include primary lead, copper, gold and silver; recycled lead, copper, gold and silver; anode slime, crude lead and other raw and auxiliary materials; as well as all forms of stocked gold and silver produced on or after January 1, 2018.

2. 术语和定义

2.Terms and Definitions

本办法中涉及的术语和定义均采用《OECD 关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》、《伦敦贵金属市场协会（LBMA）负责任黄金白银指南》、《CCCMC 中国矿产供应链尽责管理指南》所描述的内容。

All terms and definitions used in these Measures shall be construed in accordance with the provisions set forth in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas,* the *LBMA Responsible Gold and Silver Guidance*, and the *CCCMC China Mineral Supply Chain Due Diligence Guidelines*.

3. 风险减缓策略

3. Risk mitigation strategy

3.1 所有尽职调查过程中收集的信息以及由此识别和评估出供应链的实际或潜在风险需上报合规经理，再由合规经理整理后上呈合规总监。由合规总监确定风险等级。

3.1 All information collected during the due diligence process, as well as actual or potential supply chain risks identified and assessed therefrom, shall be reported to the Compliance Manager. The Compliance Manager shall compile such materials and submit them to the Compliance Director, who shall make the determination of risk levels.

3.2 根据确定的风险等级，公司采取以下风险缓解策略

--终止关系

若供应链尽职调查结果得出以下结论，则需立即停止相应批次物料冶炼并隔离、停止交易并立即向主管机构和 LBMA 报告。

1）存在有关黄金、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；

2）存在向非法的非政府武装组织提供直接或间接支持；

3）存在通过欺诈掩盖矿产品的原产地，贿赂或其他非欺诈原因而误导矿产品的原产地；

4）存在洗钱或恐怖主义融资；

5）不遵守源自受冲突影响和高风险地区(“CAHRA”)的矿产开采、贸易和出口应付政府的税收费用和使用费的规定；

6）存在触发并造成灾难性 ESG 风险的行为。

3.2 Based on the determined risk levels, the company adopts the following risk mitigation strategies

--Terminate the relationship

If the enhanced due diligence results lead to the following conclusion, the corresponding batch of materials must be immediately halted from being smelted, isolated, trading must be stopped, and reports must be immediately submitted to the competent authorities and the LBMA.

1) There are systematic or extensive human rights violations related to the extraction, transportation or trade of mined gold, silver and recycled gold, silver, including the most seriously child labour employing, cruel torture, inhuman and degrading treatment, extensive sex violence, other forced labour of serious anti human rights, war crimes, crimes against humanity or genocide;

2) Direct or indirect supports are provided to illegal non-governmental armed organizations;

3)There exists conduct to conceal the origin of mineral products by means of fraud, bribery, or other non-fraudulent methods that mislead others regarding the origin of mineral products.

4) There is money laundering or terrorist financing;

5) Failure to comply with provisions governing the payment of government taxes, fees and royalties applicable to the mining, trade and export of minerals originating from conflict-affected and high-risk areas ("CAHRAs").

6）Conduct that triggers and results in catastrophic ESG risks.

--暂停关系

若供应链尽职调查可能出现以下情况，则需立即暂停相应批次的冶炼，制定风险管理计划，供应商需在 6 个月之内提供其不存在以下事项的证明资料。若在 6 个月之内仍未提供相关证据，则需立即停止交易并向有关部门和 LBMA 报告：

1）可能存在有关黄金、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；

2）可能存在向非法的非政府武装组织提供直接或间接支持；

3）可能存在通过欺诈掩盖黄金、白银的原产地；

4）可能存在洗钱或恐怖主义融资；

5）可能不遵守源自受冲突影响和高风险地区(“CAHRA”)的矿产开采、贸易和出口应付政府的税收费用和使用费的规定；

6）可能存在触发并造成灾难性 ESG 风险的行为。

--Suspension of relationship

If the supply chain due diligence process encounters the following situations, the corresponding batch of smelting must be immediately suspended. A risk management plan needs to be formulated. The supplier is required to provide proof materials within 6 months demonstrating that the aforementioned issues do not exist. If no relevant evidence is provided within 6 months, the transaction must be immediately halted and reported to the relevant authorities and the LBMA.

1) Potential systemic or widespread human rights violations arising from the extraction, transportation or trade of gold and silver, including the worst forms of child labour, torture, inhuman or degrading treatment, widespread sexual violence, other serious forced labour violations, war crimes, crimes against humanity and genocide.

2) There may be instances of providing direct or indirect support to illegal non-governmental armed organizations.

3) There may be cases where the origin of gold and silver is concealed through fraud.

4) There may be money laundering or terrorist financing.

5) It may fail to comply with the regulations imposed by the government regarding the payment of taxes, fees and royalties for mineral extraction, trade and export in areas affected by conflicts and high-risk regions ("CAHRA").

6)There may be actions that trigger and cause catastrophic ESG risks.

--继续交易

若供应链尽职调查内容不充分且供应商正在积极配合补充相关的情况下，制定风险管理计划，供应商需在 6 个月之内仍未提供补充资料，若供应商无法在相应整改时间内减缓风险，则风险有升级的可能。

--Continue the transaction

If the supply chain due diligence is insufficient and the supplier is actively cooperating to supplement the relevant information, and formulate a risk management plan. If the supplier fails to provide supplementary materials within 6 months, and if the supplier is unable to mitigate the risks within the corresponding rectification period, there is a possibility that the risks will escalate.

4. 风险减缓策略具体步骤：

4. Specific Steps of Risk Mitigation Strategy

4.1 若供应链尽职调查结果符合终止关系情况时，则工作组需立即召集相关合规专员开立专项会议，通报解除与供应商的合同关系，并形成书面文件上报高层领导，并向有关部门和 LBMA 报告。

4.1 If the results of the supply chain due diligence indicate that the termination of the relationship is appropriate, the working group must immediately convene relevant compliance officers to hold a special meeting to inform about the termination of the contract with the supplier, prepare a written document to be submitted to senior management, and report to relevant departments and the LBMA.

4.2 若供应链尽职调查结果符合暂停关系情况时，则工作组需立即召集相关合规专员开立专项会议，通报立即暂停使用相应矿产品，同时要求供应商限期整改并提供额外资料，待资料提供齐备，恢复正常交易关系，继续交易。

4.2 If the results of the supply chain due diligence indicate that the situation warrants a suspension of the relationship, the working group must immediately convene relevant compliance officers to hold a special meeting to inform of the immediate suspension of the use of the corresponding mineral products. At the same time, it requires the supplier to make timely rectifications and provide additional materials. Once the materials are complete, the normal trading relationship will be restored and the transaction will continue.

5. 要求和征求意见

5.Requirements and Solicit opinions

要求公司员工、供应商和商业伙伴遵守上述政策，并采取必要措施来保障上述政策的贯彻落实。愿意接受客户和相关组织的监督，并欢迎供应商和利益相关方对上述政策提供建议。

It is required that staff, suppliers and business partners of the Company shall comply with the above management measures and adopt necessary actions to ensure the implementation of above management measures.We would like to accept the supervising from customers and relevant organizations, also welcome advices and proposals from suppliers and stakeholders.