豫光金铅 YUGUANG GOLD & LEAD	文件名称：黄金、白银供应链尽职调查管理规则 File Name:Gold, Silver Supply Chain Due Diligence Management Rules	版本号：第二版 Version number:second edition
内控文件编号：HNYG-GYLGLTX01-02 Internal control document number: HNYG-GYLGLTX01-02		实施日期：2025 年 01 月 15 日 Implementation for implementation date: January 15, 2025
供应链尽责管理工作组 Supply Chain Responsibility Management Working Group		

黄金、白银供应链尽职调查管理规则

Gold, Silver Supply Chain Due Diligence Management Rules

2025 年 01 月 15 日发布　　2025 年 01 月 15 日实施

Released on Jan 15th,2025　　Implementation on 15th,2025

河南豫光金铅股份有限公司

Henan Yuguang Gold and Lead Co., Ltd.

目　录

第一章 黄金、白银供应链尽职调查政策 5

Chapter 1　Due Diligence Policy for Gold and Silver Supply Chains 5

第二章 适用范围及术语 8

Chapter 2　Scope of Application and Quoted Terms 8

第一条 适用范围 Scope of Application 8

第二条 引用术语 Quoted Terms 8

第三章 公司内部组织架构及职责 10

Chapter 3 Internal organizational structure and responsibilities of company 10

第一条 黄金、白银供应链公司内部组织架构 Internal Organizational Structure of Gold，Silver Supply Chain Company 10

第二条　职责 Responsibilities 10

第四章 管理体系 14

Chapter 4　Management System 14

第一条 制定和发布公司关于 LBMA 负责任黄金、白银供应链尽职调查政策 Develop and publish the Company’s due diligence policy on LBMA responsible Gold, Silver supply chain 14

第二条 尽职调查流程 Due diligence process 15

第三条 尽职调查内容 Content of due diligence 17

第四条 尽职调查措施 Due diligence measures 18

第五条 风险评价标准 Risk evaluation criteria 19

第六条 黄金、白银供应链尽职调查培训 Due diligence training for Gold, Silver supply chain 26

第七条 供应链追溯系统 Supply chain traceability system 27

第八条 文件和记录的保留 Retention of Documents Records 27

第九条 黄金、白银供应链违规行为、事项上报程序 Reporting procedures for violations and events in Gold, Silver supply chain 28

第十条 黄金、白银供应链交易监督 Gold, Silver Supply Chain Transaction Monitoring 29

第十一条 黄金、白银供应链第三方审核监督 Third party audit and supervision of Gold, Silver supply chain 32

第十二条 问责 Accountability 33

第十三条 黄金、白银供应链违规上报通讯机制 Gold, Silver Supply Chain Violation Reporting Communication Mechanism 33

附件一供应链尽责管理申诉书 35

Annex 1 36

Supply Chain Due Diligence Management Complaint Letter 36

第一章 黄金、白银供应链尽职调查政策

Chapter 1 Due Diligence Policy for Gold and Silver Supply Chains

河南豫光金铅股份有限公司严格遵守国家关于职工权利维护、环境保护等各项法律法规，积极响应矿产供应链尽责管理的可持续发展行业倡议和《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（第三版）》，以及严格遵守《LBMA 负责任黄金指南》和《LBMA 负责任白银指南》，并按照以上要求建立黄金和白银供应链尽职调查管理体系，积极推行黄金和白银供应链尽职调查工作，确保黄金和白银供应链符合《LBMA 负责任黄金指南》、《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 complies with the "LBMA Responsible Gold Guidelines" and "LBMA Responsible Silver Guidelines", and has established a due diligence management system for the gold and silver supply chain in accordance with their requirements. It actively implements the due diligence work for the gold and silver supply chain, ensuring that the gold and silver supply chain meets the requirements of the "LBMA Responsible Gold Guidelines" and the "LBMA Responsible Silver Guidelines". 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. Systematic or widespread human rights abuses associated with the extraction, transport or trade of Silver and Gold, 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.向非法武装组织或向通过供应链非法控制矿区、交易商、其他中间商、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。

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.通过贿赂或欺诈掩盖白银、黄金原产地。

3. Bribery and fraudulent misrepresentation of the origin of Silver and Gold.

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开采、贸易及出口税费要求。

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.洗钱或恐怖主义融资。

5.Money-laundering or terrorist financing.

6.助长冲突。

6. Contribution to conflict.

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. Higher-risk business activity such as arms, gaming and casino industry, antiques and art, sects and their leaders

8.最终受益人是政治人物或通缉人员

8. Upstream companies or their beneficial owners with significant influence are PEPs

9. 矿产开采过程滥用汞和氰化物。

9. Excessive use of mercury and cyanide in mineral extraction processes.

10.不符合环境和可持续性发展要求，开采金银源于世界遗产或生态保护区域的直接或间接与该方有关联；违反环境、劳工健康、安全和与社区有关的国家立法，触发并造成灾难性 ESG

影响的。

10.Failure to meet environmental and sustainable development standards; direct or indirect involvement in gold and silver extraction within World Heritage Sites or ecological protected areas; violations of national legislation on the environment, labor health, safety and community relations that result in catastrophic ESG consequences..

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 负责任黄金指南》和《LBMA 负责任白银指南》的要求。

We will regularly assess supply chain risks in accordance with the requirements of the management system, establish a management file for supplier due diligence, and ensure that the supply chain continuously complies with the requirements of the "LBMA Responsible Gold Guidelines" and the "LBMA Responsible Silver Guidelines".

第二章 适用范围及术语

Chapter 2 Scope of Application and Quoted Terms

第一条 适用范围 Scope of Application

本黄金、白银供应链尽职调查规则，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有黄金、白银收购、加工、交易相关的所有供应商、相关合作伙伴（包括黄金、白银生产商、中间商、加工商、出口商和运输商）。

The Gold, Silver Supply Chain Domestic Survey Rules are applicable toHenan Yuguang Gold and Lead Co.,Ltd, as well as all suppliers and related partners related to Gold, Silver acquisitions, processing and transactions with Henan Yuguang Gold and Lead Co.,Ltd. (Including Gold, Silver manufacturers, middlemen, processors, exporters and transporters.)

第二条 引用术语 Quoted Terms

1、受冲突影响和高风险区域（CAHRA）：受冲突影响和高风险区域的特点是存在武装冲突、大范围暴力活动或其他有害于民众的风险。武装冲突的形式多种多样，如国际冲突或非国际冲突，有可能涉及两个或两个以上的国家，也有可能是解放战争、叛乱、内战等。高风险地区是指有可能存在政局不稳或政治压迫、制度缺陷、不安全因素、民用基础设施崩溃，以及广泛暴力活动的地区。通常这类地区的特点是存在广泛侵犯人权和违反国际国内法律的现象。

1. Conflict-affected and high-risk areas (CAHRA): These areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a

variety of forms, such as an international and non-international conflict, which may involve two or more states, or may consist of wars of liberation, insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.

2、人权：人权是指《国际人权法案》中定义的人权。该法案包括《世界人权宣言》《经济、社会、文化权利国际公约》《公民权利和政治权利国际公约》及其两项任择议定书（关于申诉程序和关于死刑）。

2. Human rights: Human rights are those defined in the International Bill of Human Rights. The Bill includes the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, as well as its two optional protocols (on the complaints procedure and on the death penalty).

3、供应商：指任何个人或组织在金银和含金银材料供应链的参与者。

3.Supplier: This term refers to any individual or organisation that is a participant in the supply chain for the supply of gold/silver and gold/silver-bearing materials.

4、尽职调查：为准备商业交易及维持关系过程中对相关公司或组织进行的研究和分析。根据精炼商的意愿，需要评估的活动应包括经合组织尽职调查指南附件二中确定的风险、洗钱以及环境、社会和治理责任。

4. Due diligence: Research and analysis of a company or organization done in preparation for a business transaction and throughout the relationship. Activities to be assessed, based on the Refiner’s appetite, should include those risks identified in the Annex II of the OECD Due Diligence Guidance, such as money laundering, as well as environment, social and governance responsibilities.

5、ESG 因素：经营所在国家/地区的环境、健康、安全和劳工法规及/或公司政策等。

5.ESG factor:Environmental, health, safety and labor regulations and/or company policies and so on.

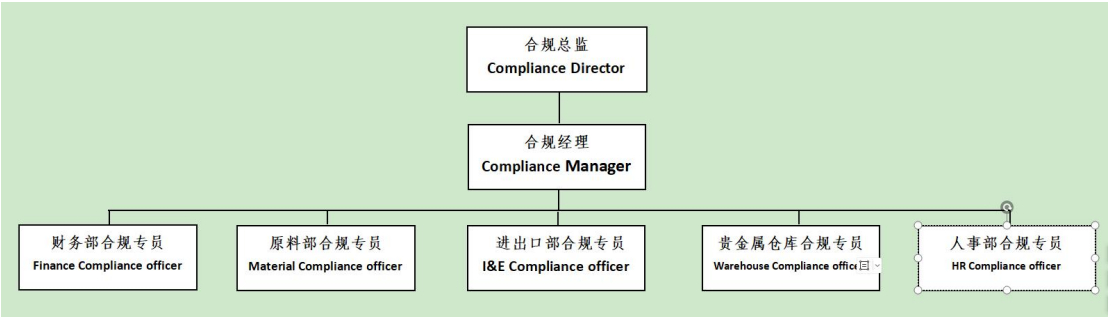
第三章 公司内部组织架构及职责

Chapter 3 Internal organizational structure and responsibilities of company

第一条 黄金、白银供应链公司内部组织架构 Internal Organizational Structure of Gold，Silver Supply Chain Company

河南豫光金铅股份有限公司为黄金、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 gold, silver supply chain. The organizational structure is as follows:



第二条 职责 Responsibilities

1、合规总监 Compliance Director

河南豫光金铅股份有限公司授权的高级管理者副总经理，对外根据我公司原料采购政策和公司的生产、财务以及销售等实际情况需要，负责审批与供应商合作合同的签订，并负责对供应商进行审查的相关事宜。对内高级管理者根据 LBMA 负责任的黄金、白银指南文件，对相关员工进行培训，使相关负责人清楚的理解这一体系的目的和意义，明白自己在尽职调查政策实施中的职责。

The deputy general manager of the senior management authorized by Henan Yuguang Gold and Lead Co.,Ltd , is responsible for reviewing and approving the signing of cooperation contracts with suppliers and responsible for reviewing related matters of suppliers. According to the LBMA Responsible Gold, Silver Guidelines document,internal senior managers train relevant employees.To make sure relevantr esponsible persons clearly under stand the purpose and sign if icance of this system and their responsibilities in the implementation of due diligence policies.

2、合规经理 Compliance Manager

协助合规总监全面负责供应链尽职调查事务，对黄金、白银供应链上的所有事情负责，确保公司整个黄金、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。负责黄金、白银供应链尽职调查及风险控制的培训，起草和更新黄金、白银供应链政策，为高级管理者提供准确的信息。

（1）有权监查黄金、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，需要及时向合规总监汇报。

（3）定期对员工进行黄金、白银供应链规则培训，起草和更新黄金、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）协助与鼓励黄金、白银原料供应商及交易客户承诺遵守黄金、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层报告。

Assist Compliance Director to be fully responsible for due diligence of Gold, Silver supply chain, be responsible for all matters in Gold, Silver supply chain, ensure that the whole Gold, Silver supply chain of the company complies with risk management regulations, and can effectively identify and avoid risks. Responsible for Gold, Silver supply chain due diligence and risk control training, drafting and updating Gold, Silver supply chain policy, providing accurate information for

senior managers.

(1) Have the right to inspect the due diligence process of Gold, 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 Gold, Silver supply chain rules, draft and update Gold, 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 Gold, Silver raw material suppliers and Gold, Silver trading customers to commit to abide by the due diligence rules of Gold, Silver supply chain;

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

3、原料部及进出口部合规专员 Compliance officer of Raw Material Department and I&E Department

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 of 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经理报告。

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 manager in time.

5、贵金属仓库合规专员 Compliance officer of precious metal warehouse

仓库管理员应按照客户进行分类作好黄金、白银的入库、出库记录，如出现异常情况需及时向合规经理报告。

The warehouse keeper should classify the Gold, Silver according to the customers and make a record of the storage and delivery of Gold, Silver.In case of any abnormal situation, it is necessary to report to the compliance manager in time.

6、人事部合规专员 Compliance officer of HR

人事部合规专员负责指导搜集、提供和维护以下信息，包括但不局限于：本公司管理架构图（包括企业高层管理人员、董事姓名）、员工花名册、员工招聘和选拔政策、童工预防和补救程序、强迫劳动预防和补救程序等。

The Compliance Officer of the Personnel Department is responsible for directing the collection, provision and maintenance of the following information, including but not limited to: the company's management structure chart (including the names of senior executives and directors of the company), employee roster, employee recruitment and selection policies, child labor prevention and remedy procedures, forced labor prevention and remedy procedures, etc.

第四章 管理体系

Chapter 4 Management System

第一条 制定和发布公司关于 LBMA 负责任黄金、白银供应链尽职调查政策 Develop and publish the Company's due diligence policy on LBMA responsible Gold, Silver supply chain

公司关于 LBMA 负责任黄金、白银的公告，告知供应链合作方严格遵守公司黄金、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。公司黄金、白银原料采购承诺，承诺遵守《LBMA 负责任黄金指南》和《LBMA 负责任白银指南》，积极参与并支持 LBMA 含金银原料的可追溯性工作，严格遵守黄金、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黄金、白银原料供应商进行交易。

The company's announcement regarding LBMA Responsible Gold and Silver informs its supply chain partners to strictly adhere to the company's gold and silver supply chain management system, and publicly accepts supervision from all sectors of society and internal employees of the company. The company's commitment to the procurement of gold and silver raw materials states that it will abide by the "LBMA Responsible Gold Guidelines" and "LBMA Responsible Silver Guidelines", actively participate in and support the traceability work of LBMA gold and silver-containing raw materials, strictly comply with the requirements of the conflict-free smelters plan for the gold and silver supply chain, and will not conduct transactions with suppliers who provide gold and silver raw materials from conflict-affected regions and high-risk areas.

第二条 尽职调查流程 Due diligence process

2.1 在交易前，将公司负责任黄金、白银供应链管理政策及要求明确告知对方。

2.1 Before the transaction, the Company shall clearly inform the other party of the management policies and requirements of the responsible Gold, 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。

2.2 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。

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

2.4 编制尽职调查报告。

2.4 Prepare due diligence report.

2.5 加强型尽职调查流程 Enhanced Due Diligence Process

2.5.1 当公司识别出高风险信号后，将公司的加强型的尽职调查要求和 LBMA 工具包中的现场评估工具传递至直接供应商，直接供应商则需按要求进行进一步的尽职调查，并限期提供相应的调查结果和相关资料，并进行合理解释说明。公司对其进行确认和评估，若满足负责任审核的要求后，则降低风险等级，恢复正常贸易关系。

2.5.1 Once we identifies high-risk signals, we will convey its enhanced due diligence requirements and the on-site assessment tools in the LBMA toolkit to the direct suppliers to the direct suppliers. The direct suppliers conduct further due diligence as per the requirements, provide the corresponding investigation results and relevant materials within the specified time limit, and give reasonable explanations. We will confirm and evaluate them. If they meet the requirements of responsible review, the risk level will be reduced and the normal trade relationship will be restored.

2.5.2 若直接供应商未按 2.5.1 条款进行加强型尽职调查，或限期并未提供相应调查资料及合理解释，则公司先暂停其业务关系，同时成立风险评估团队，可通过参与行业集体行动或委托第三方进行现场评估，但保留公司对开展评估活动和决策的责任。如果行业集体行动信息搜集范围无法满足本公司的评估需要，则公司将单独开展实地评估行动，如果基于矿山实际情况，无法进行实地评估，企业会选择暂停/终止该矿山的采购业务。

2.5.2 If the direct supplier fails to conduct enhanced due diligence as per clause 2.5.1, or fails to provide the corresponding investigation materials and reasonable explanations within the specified time limit, the company will first suspend its business relationship. At the same time, a risk assessment team will be established. The assessment can be conducted through participating in industry collective actions or entrusting a third party for on-site evaluation, but the company retains the responsibility for organizing the assessment activities and making decisions. If the information collection scope of the industry collective actions cannot meet the assessment needs of the company, the company will independently carry out on-site assessment actions.If it is impossible to conduct on-site assessment based on the actual situation of the mine, the enterprise will choose to suspend/terminate the procurement business of that mine.

2.5.3 加强型尽职调查应包括以下内容

a)了解在矿区和供应链中提供的公共或私人安保服务的性质(包括根据《安全和人权自愿原则》对安保人员进行筛选和培训)。

b)考虑矿区和运输路线军事化以及为非法非国家武装组织或公共或私人安全部队提供直接或间接支持的风险。

c）确定相关方在矿区、运输路线和金银交易及/或出口环节犯下的严重侵犯人权行为的风险。

d)在适用的情况下，完成税务和使用费合规的自我声明。

e)考虑相关方在遵守环境、健康、安全、劳工、社区、商业诚信法规、政策和最佳实践的情况。

2.5.3 Enhanced due diligence should include the following contents,

a) Understand the nature of public or private security services provided in the mining area and the supply chain (including the screening and training of security personnel in accordance with the Voluntary Principles on Security and Human Rights).

b) Consider the risks of militarization of the mining area and transportation routes, as well as direct or indirect support provided to illegal non-state armed organizations or public or private security forces.

c) Determine the risks of serious human rights violations committed by relevant parties in the mining area, transportation routes, gold and silver transactions and/or export processes.

d) If applicable, complete a self-declaration of tax and usage fee compliance.

e) Consider the situation of compliance with environmental, health, safety, labor, community, business integrity regulations, policies and best practices by relevant parties.

第三条 尽职调查内容 Content of due diligence

3.1 尽职调查供应商包括矿产黄金、白银供应商、再生黄金、白银供应商、贸易商。

3.1 The due diligence for suppliers includes suppliers of gold and silver minerals, recycled gold and silver suppliers, as well as traders.

3.2 尽职调查客户包括贸易商等。

3.2 Due diligence customers include traders, 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任的供应链采购情况。

3.3 Before purchasing and selling transactions occur, it is necessary to understand the purchasing

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、黄金、白银原料产地识别，采矿与出口许可证，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。

3.4 Due diligence shall include supply chain qualification, identification of Gold, 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.

第四条 尽职调查措施 Due diligence measures

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

4.1 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，如有意向供应商或客户，需要及时对其进行风险评估，符合体系要求方可进行交易。

4.2 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。

4.3 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。

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

4.5 针对矿产黄金、白银供应商，在交易前，需要获得如下信息：

4.5 For mineral and Gold, Silver suppliers, the following information shall be obtained before trading:

a)黄金、白银的产地来源信息。

b)采矿许可证。

c)提供进/出口黄金、白银或者精矿许可证。

d)采矿情况信息证明。

e)定期对矿产黄金、白银客户进行尽职调查。

a) Information on the origin of Gold, Silver

b) Mining permits

c) Provision of permits for the import/export of Gold, Silver or concentrate

d) Proof of mining information

e) Regular due diligence of mineral Gold, Silver customers

4.6 针对回收黄金、白银供应链客商，在交易前，需要获得如下信息：

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

a)再生黄金、白银供应商需提供合法的商业关系，包括再生金银来源证明、受益人等信息。

b)公司会持续不断的对再生黄金、白银客户进行尽职调查。

a) Suppliers of recycled Gold, Silver are required to provide legal business relationships, including information such as proof of the source of recycled Gold, Silver, beneficiaries, etc.

b) The Company will conduct continuous due diligence on recycled Gold, Silver customers.

第五条 风险评价标准 Risk evaluation criteria

5.1 风险评价方法 Risk assessment method

供应链尽职调查应从三个维度进行:位置(包括来源)、供应商和材料类型风险。

The supply chain due diligence shall be conducted from three dimensions: location (including source and route), supply chain and type of raw materials.

5.1.1 位置风险识别应包括但不包括限于:

a)确定黄金、白银的来源，真实记录来源分类：矿产金银、再生金银、采矿副产品、官方库存；

b)确定黄金、白银的来源地或途径地，参考中国政府认可的国际制裁名单（英国、美国、欧盟和联合国制裁名单）、多德－弗兰克法案第 1502 条、欧盟 CAHRA 名单、海德堡晴雨表、脆弱国家指数或类似的指数、联合国人权事务高级专员办事处或同等机构、金融行动特别工作组（FATF）的报告（包括相关国家/地区报告）、关于高风险黄金、白银中心/转运中心和高洗钱风险国家/地区的可靠市场情报。

c)黄金、白银是否来源于一个已知储量有限、资源有限或预计黄金、白银产量有限的国家。

5.1.1 Location risk identification shall include but not be limited to:

a) Determine the source of Gold, Silver, and the true recording source classification: mineral Gold, Silver, regeneration Gold, Silver, mining by -products,official inventory;

b) Determine the origin or transit locations of gold and silver, and refer to the international sanctions lists recognized by the Chinese government (including sanctions lists of the United Kingdom, the United States, the European Union and the United Nations), Section 1502 of the Dodd-Frank Act, the EU CAHRA List, the Heidelberg Barometer, Fragile States Index or similar indices, reports from the Office of the United Nations High Commissioner for Human Rights or equivalent institutions, reports issued by the Financial Action Task Force (FATF) (including relevant country/region reports), as well as reliable market intelligence on high-risk gold and silver hubs/transshipment centres and jurisdictions with high money laundering risks.

c) Mineral Gold, Silver originates from a country with known limited reserves, limited resources or expected limited Gold, Silver production.

5.1.2 供应商风险识别应包括但不限于:使用工具包中的 KYC 问卷对供应链进行风险识别，包括但不限于:

a)利用可靠的、独立来源的文件、数据或信息，识别和核实供应链客户的名称、实际地址、公司注册和许可证信息;

b)识别核实最终受益人和关联方信息;

c)确认交易方及其最终受益人不在任何政府通缉的洗钱者或已知的欺诈者或恐怖分子名单中;

d)了解业务信息，预测业务关系的目的。

5.1.2 Supply chain risk identification shall include but not belimited to: The KYC questionnaire in toolkit is used to conduct the risk identification of supply chain, including but not limited to:

a)Make use of reliable, independently sourced documents, data, or information, identify and verify the name, actual address, company registration and license information of supply chain customers;

b) Identify and verify the ultimate beneficiary and related party information;

c) Confirm that the Gold, Silver trading parties and their ultimate beneficiaries are not included in any government’s list of wanted money launderers or known fraudsters or terrorists;

d) Understand the business and predict the purpose of the business relationship.

5.1.3 物料风险主要关注手工和小规模开采矿（ASM）还是大规模开采矿（LSM）。

The main focus of material risk is on artisanal and small-scale mining (ASM) or large-scale mining (LSM).

5.2 基于风险状况对供应链进行分类 Classified the supply chain based on risk conditions

公司将供应链分为零容忍供应链、高风险供应链、中风险供应链、低风险供应链。

The companyd ivides the supply chain into zero-tolerance Gold, Silver supply chain , high-risk supply chain, mid -risk supply chain, and low-risk supply chain.

5.2.1 零容忍供应链的评判标准 Standards for judging of zero tolerance supply chain

1）认为开采或回收黄金、白银来自被指定为世界遗产地的地区。

2）已知开采或回收的黄金、白银的来源违反了国际制裁（包括但不限于联合国、欧盟、英国

和美国制裁）且得到中国政府承认。

3）被开采或回收黄金、白银的供应相对方、其他已知的上游公司或它们的最终受益者是已知的洗钱者、恐怖主义融资、诈骗或恐怖分子，或曾涉嫌严重侵犯人权，直接或间接支持非法的非国家武装组织，或欺骗性地谎报矿物来源。如发现零容忍问题，不得与黄金、白银供应相对方建立业务关系 ，或必须立即终止现有关系。

1)The Gold, Silver that is considered to be mining comes from areas designated as a World Heritage or Reserve.

2)The source of Gold, Silver known as mining or recycling violates internat ional sanctions(including but not limited to the United Nations, the European Union, the United Kingdom , and the United States) and it has also been recognized by the Chinese government.

3)The supplier of mining or recycling Gold, Silver， other known upstream companies , or their ultimate benef iciaries are known money launders, terrorist financing， frauds or terrorists, or have been suspected of seriously infringing human rights and indirectly support illegal non-national armed forces. Organization , or deceived the source of minerals.

If zero tolerance is found， it shall not establish a business relationship with the supply of Gold, Silver , or it must immediately terminate the existing relationship.

5.2.2 根据 LBMA 和 OECD 相关规定，结合公司实际情况，特规定如下高风险供应链评判标准：

（1）原料金银来源于、中转或者运经冲突影响或侵犯人权高风险地区。

（2）原料金银声称来源于一个已知储量有限、资源有限或预计黄金、白银产量有限的国家。

（3）原料金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）在黄金、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）在黄金、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）在黄金、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）采购自 ASM。

（8）使用汞生产。

（9）造成灾难性伤害或高度不利的 ESG 因素（在精炼商能够识别的范围内）

当上述评判标准任何一条客观存在时，则该供应链被判定为高风险供应链。部门合规专员应立即准备材料上报合规经理，由合规经理上报合规总监，由合规总监批准采取应对措施，暂停交易，强化尽职调查，消除风险。

5.2.2 According to the relevant regulations of LBMA and OECD, combined with the actual situation of the Company, the following assessment criteria for high-risk supply chain are specified:

(1) The mined Gold, Silver originates from, has transited or has been transported via a conflict-affected or human rights abuse high-risk area.

(2) The mined Gold, Silver is claimed to be originated from a country that has limited known reserves, likely resources or expected production levels of Gold, Silver.

(3) The mined Gold, Silver originates from places where conflict-affected and human rights abuse high-risk areas are known, or reasonably suspected, to transit.

(4) Gold, Silver-supplying counterparty or other known upstream companies are located in a country representing high-risk for money laundering, crime and corruption.

(5) Gold, Silver-supplying counterparty or other known upstream companies or their beneficial owners with significant influence over the Gold, Silver-supplying counterparty are PEPs.

(6) Gold, Silver-supplying counterparty or other known upstream companies are active in a higher-risk business activity such as arms, gaming and casino industry, antiques and art, sects and their leaders.

(7) Material from ASM。

(8) Produced with mercury.

(9) Cause catastrophic injury or highly adverse ESG factors (to the extent that refiners can identify).

When any of the above evaluation criteria objectively exists, the supply chain is determined to be a high-risk supply chain. The department compliance officer should immediately prepare the materials and report them to the compliance manager. The compliance manager will then report to the compliance director, who will approve the implementation of countermeasures, stop the transactions, strengthen due diligence, and eliminate the risks.

5.3 评价标准 Evaluation criteria

a)风险评价项目详见表《黄金、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 Gold, Silver Supply Chain (Mineral Raw Materials, Recycled Raw Materials and Customers) for details of risk assessment items.

b)风险等级 Risk Level

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；

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

40 points≤R< 80 points, medium risk;

R< 40, high risk;

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；

Recycled raw materials: score R≥ 50 points, low risk:

30 ≤R< 50 points, medium risk;

R < 30, high risk

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；

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

30≤R< 50 points, medium risk;

R<30, high risk;

5.4 应对措施 Response measures

a)低风险：继续交易，降低风险。

b)中风险：暂停交易，直至降低为低风险。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：对于大规模开采的黄金、白银、手工及小型矿开采的黄金、白银、再生金银：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(包括黄金、白银生产商、贸易商、出口商和运输商)的受益所有人和政府监控名单信息都要求要核实。

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。

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

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

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:

For Gold, Silver mined on a large scale, Gold, Silver and recycled Gold, 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 Gold, Silver producers, traders, exporters and transporters) are required to be verified.

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.

第六条 黄金、白银供应链尽职调查培训 Due diligence training for Gold, Silver supply chain

6.1 公司每年会对黄金、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。

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

6.2 涉及黄金、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。

6.2 Employees involved in the Gold, 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。

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

6.4 培训档案。培训后，需建立相应培训档案。记录保存至少 5 个会计年度。

6.4 After the training , the corresponding trainingfile is required. Record preservation saves at least 5 accounting years.

第七条 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：

7.1 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）黄金、白银产品向上追溯（黄金、白银—原料）

- 含金银物料类型（矿产黄金、白银/再生黄金、白银）
- 入库重量和分析报告；
- 原料入库日期和成品入库日期；

b）黄金、白银产品向下追溯（黄金、白银—顾客）

- 顾客信息；
- 交易重量和分析报告；
- 出库日期；

a) Upward traceability of Gold, Silver products (Gold, Silver-raw material)

-Gold, Silver-containing material type (mineral Gold, Silver/recycled Gold, Silver);

-Warehousing weight and analysis report;

-Raw material storage date and finished product storage date;

b) Downward traceability of Gold, Silver products (Gold, Silver-customer)

-Customer information;

-Transaction weight and analysis report;

-Outbound delivery date;

第八条 文件和记录的保留 Retention of Documents 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.

第九条 黄金、白银供应链违规行为、事项上报程序 Reporting procedures for violations and events in Gold, Silver supply chain

9.1 公司黄金、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，合规专员将发现的违规行为、事项及处理建议及时向合规经理进行报告，公司合规经理向公司黄金、白银供应链管理领导小组合规总监汇报。

If the relevant staff of the company's gold and silver supply chain find any violations or matters, they shall timely report to the compliance specialist of the company or the subsidiary company in writing or by phone. The compliance specialist will timely report the violations, matters and handling suggestions to the compliance manager, and the compliance manager will report to the compliance Director of the company's gold and silver supply chain management leading group.

9.2 发现存在有关黄金、白银提取、运输或贸易的系统性或广泛人权侵犯行为，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，或者欺诈掩盖黄金、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 Gold, Silver, or when suppliers provide direct or direct support to illegal non-governmental armed organizations, or fraudulently cover up the origin of Gold, 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 发现可能存在有关黄金、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，或者欺诈掩盖黄金、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，并对供应链供应商进行专项调查，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 Gold, Silver, or when suppliers provide direct or indirect support to illegal non-governmental armed organizations, or fraudulently cover up the origin of Gold, 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.

第十条 黄金、白银供应链交易监督 Gold, Silver Supply Chain Transaction Monitoring

公司将对交易关联的过程贯穿始终的审查和监管，来确保交易时对供应链的了解和风险预测一致。对交易的监管运用基于风险的方法来开展因此，公司对每一批收到的黄金、白银获取并记录以下信息：

The company will review and supervise the process of transaction association throughout to ensure that the understanding of the supply chain and the risk prediction are consistent during the transaction. The supervision of transactions is carried out using a risk-based approach.

Therefore, the company obtains and records the following information for each batch of Gold, Silver received:

（一）矿产金银Mined Gold, Silver

1、预估的重量和化验结果（来自供应方）。

2、航运/货运单据（运货/空运单、形式发票）。

3、高风险交易的进出口表格。

4、每次付款记录对应合同记录凭证存档。

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

2) Shipping/freight documents (shipping/air waybill, proforma invoice).

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

4)Archive the corresponding contract record voucher for each payment record.

（二）回收金银 Recycled Gold, Silver

1、预估重量（来自供应方）。

2、航运/货运单据（运货/空运单、形式发票）。

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

1). Estimated weight (from the supplier).

2).Shipping/freight documents(shipping/air waybill,proforma invoice).

3).In case of high-risk transactions in recycled Gold, Silver, the company must require customers to provide corresponding documents for mutual verification, verify that the documents are true and consistent, and conduct a transaction background investigation. If the situation is inconsistent, it needs to pass an investigation and obtain a written investigation result.

每年各部门合规专员需向合规经理提交风险评估报告，由合规经理向合规总监提交汇总后的风险评估报告。公司高级管理层通过风险评估报告审批每一个评估为高风险的供应链，并每年重新决定是否继续与之保持商业关系。

Every year, the compliance specialists of each department need to submit a risk assessment report to the risk control compliance specialist, and the risk control compliance specialist submits a summary risk assessment report to the senior management.The company’s senior management has passed risk assessment,including approving each supply chain assessed as high risk, and

re-deciding whether to continue to maintain a business relationship with itevery year.

（三）、避免现金交易流程Void cash transactions

1、明确交易方式Clear trading methods

在公司财务制度中明确规定，公对公支付货款、税费等公对公业务需采用电子支付、银行转账等非现金交易方式。

In the company's financial system, it is clearly stipulated that the business-to-business payment of goods, taxes and other business-to-business needs to adopt non-cash transactions such as electronic payment and bank transfer.

2、业务操作执行Business operation execution

1)、合同约定：在与客户、供应商签订的合同中，明确约定交易方式为非现金支付，并注明具体的支付账号、支付时间等信息。如规定在合同签订后的一定期限内，买方通过银行转账方式支付货款。

2)、员工培训：加强对员工的财务知识培训，使其了解避免现金交易的重要性和操作流程。如培训如何使用电子支付工具、填写银行票据等，提高员工的业务水平和合规意识。

1).Contract agreement: In the contract signed with customers and suppliers, it is clearly agreed that the transaction method is non-cash payment, and indicate the specific payment account number, payment time and other information. If it is stipulated that within a certain period of time after the signing of the contract, the buyer shall make payment by bank transfer.

2).Staff training: Strengthen the financial knowledge training for employees, so that they understand the importance of avoiding cash transactions and the operation process. Such as training how to use electronic payment tools, fill in bank bills, etc., improve the staff's business level and compliance awareness.

3、财务监控与管理 Financial monitoring and management

1）资金核对：财务部门定期与银行进行对账，确保银行账户收支记录与公司财务账目一致。同时，对电子支付和银行转账等交易记录进行详细核对，及时发现异常交易。

2）内部审计：建立健全内部审计制度，定期对公司的交易记录进行审计，检查是否存在违规现金交易行为。如发现问题，及时进行整改，并追究相关人员的责任。

1).Fund verification: The financial department regularly reconciles accounts with the bank to ensure that the bank account income and expenditure records are consistent with the company's financial accounts. At the same time, the transaction records such as electronic payment and bank transfer are checked in detail to detect abnormal transactions in time.

2)Internal audit: Establish and improve the internal audit system, regularly audit the company's transaction records, and check whether there are illegal cash transactions. If found problems, timely rectification, and investigate the responsibility of the relevant personnel.

第十一条 黄金、白银供应链第三方审核监督 Third party audit and supervision of Gold, 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，涉及黄金、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 Gold, Silver supply chain management shall carefully compare the problems and formulate improvement measures, set time limits, assign responsible persons, etc.

第十二条 问责 Accountability

公司各相关部门、分子公司涉及黄金、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 Gold, 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.

第十三条 黄金、白银供应链违规上报通讯机制 Gold, Silver Supply Chain Violation Reporting Communication Mechanism

所有公司内部黄金、白银供应链相关工作人员如发现违规事项，应及时向所属板块合规专员进行邮件及电话报告，再由合规专员向合规经理进行邮件及电话报告。由合规经理负责处理，在 3 个工作日内采取直接面谈的方式与员工答复，整个申诉过程中保护员工隐私，对举报人信息保密，杜绝任何行为的打击报复。

All staff related to the compang’s internal Gold, Gold, Silver supply chain should report to the compliance officer of the sector by email and phone in a manner if they find any violations,and then the compliance officer will report to the compliance risk control officer by email and phone.the compliance and risk control officer is responsible for handling the ,and responds to employees is protected during the entire appeal process,the information of informants is kept confidential,and any acts of retaliation are eliminated.

请各供应商严格遵守本公司黄金、白银供应链管理制度，同时请社会各界及公司全体员工监督，对违规操作进行举报。

Suppliers are requested to strictly abide by the company’s Gold, Gold, Silver supply chain management system,and all the employees of the society and the company are required to supervise

and report illegal operations.

申诉者应填写附件一所示《供应链尽责管理申诉书》，语种不限。申诉书应通过电子邮件或邮寄至公司黄金、白银负责任供应链工作组。

The complainant is required to complete the Supply Chain Responsible Management Appeal Form, as shown in Appendix I, in any language. The complaint should be submitted via email or mail to the Company's Gold, Silver Responsible Supply Chain Working Group.

邮箱：yuguang301@126.com

EMAIL：yuguang301@126.com

地址：河南省济源市荆梁南街 1 号豫光金铅集团公司 301 室-供应链尽责管理工作组

Address: Room 301 - Supply Chain Responsible Management Working Group, Yuguang Gold and Lead Group Co., LTD., No. 1 Jingliang South Street, Jiyuan City, Henan Province

河南豫光金铅股份有限公司

Henan Yuguang Gold and Lead Co.,Ltd

2025 年 01 月 15 日

Date:2025-01-15

附件一 供应链尽责管理申诉书

申诉者名称（可匿名）		是否要求保密	
联系电话		电子邮箱	
是否为受委托的第三方		如是，受何人或何团体委托（同时附受委托证明）	
冲突回避	（如需要回避公司供应链尽责管理委员会、尽责管理工作组的特定人员，请列出其姓名）		
所遭受（或可能遭受）负面影响的事实和证据，以及其他任何能够支持申诉的信息（可附页，并附申诉证据）：			
您的诉求，以及实现诉求所希望采用的解决方案（明确且可操作的诉求能够帮助我们更快的帮您解决问题）			
申诉者代表签名： 日 期：			

Annex 1

Supply Chain Due Diligence Management Complaint Letter

Name (allow anonymous)		Confidentiality or not	
Contact number		Email	
Third party entrusted or not		If yes, pls attached the letter of attorney	
Avoidance	If necessary for certain individuals to be excused from participation, please list.		
Pls list fact and evidence you suffer or may suffer,and other information (You can attach more additional pages,and pls attached your appeal evidence)			
The appeal and solution you hope(Clear and actionable ,and we can solve your appeal quickly)			
Signature: Date:			