



永兴贵研资源有限公司

Sino-Platinum Metals(Yong Xing) Resources Co.,Ltd.

2023年度

白银供应链尽职调查合规报告

**Due Diligence Management Compliance Report of  
Silver Supply Chain in 2023**

**(Published in January 2024, Updated in June 2024)**

Company Name:	永兴贵研资源有限公司 SINO-PLATINUM METALS (YONG XING) RESOURCES CO., LTD.
Location:	High-tech Industrial Park, Economic Development Zone, Yongxing, Chenzhou, Hunan, China
Reporting year-end:	December 31th, 2023
Date of Report	January 8th, 2024, , updated on June 27th, 2024
Senior management responsible for this report	Mr. Li Kun/Compliance Director Mr. Li Xiong/Compliance Supervisor

## 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.

本报告总结了永兴贵研资源有限公司2023财年内(2023年1月1日-2023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 SINO-PLATINUM METALS(YONG XING) RESOURCES CO.,LTD. in the fiscal year 2023(January 1, 2023-December 31, 2023) with the requirements of the 《 London Bullion Market Association Responsible Silver Guide 》 .

## Part II 第二部分

### Company Profile 工厂概况

永兴贵研资源有限公司(以下简称:“永兴贵研”)由贵研铂业股份有限公司(以下简称:“贵研铂业”,股票代码:600459),联合郴州财智金属有限公司于2010年1月投资成立,注册资本5000万,公司坐落于有着“中国银都”美誉之称的湖南永兴。

公司是一家集贵金属精炼、有色金属资源开发及循环利用、再生资源回收、贵金属检测技术研发、生产经营为一体的高新技术企业。公司目前占地50亩,现有员工100余人。

公司现有的主要产品有白银、黄金、铂、钯、铑、铽、钇以及金珠、银珠、银粉等精深加工产品。拥有年产1500吨白银铸造生产线、500吨的白银电解生产线、年处理100吨电接触边角料综合回收生产线、20吨黄金电解生产线、5吨铂族金属精炼生产线以及复杂贵金属二次资源湿法综合回收研发试验平台、分析检测平台，2023年产值66亿元。

公司自成立以来，多次被评为湖南省有色金属规模效益50强企业，连续2年入选湖南省工业制造业企业100强。公司旗下主营的产品“贵研”牌国标1号银，获得了上海黄金交易所、上海期货交易所可提供标准银锭企业认证，属于国内的一线白银品牌，备受市场青睐，连续6年荣获全国“用户最喜爱的20大白银品牌”称号。

到目前为止，公司累计申请专利7项，授权3项，其他专利18项。公司通过了ISO9001：2015质量管理体系、ISO14001：2015环境管理体系、ISO45001：2018职业健康安全管理体系认证和三级安全标准化认证工作。

公司积极参与多项社会公益事业、慈善事业，深入到农村基层进行精准扶贫，乡村振兴工作。公司为当地解决100余个就业工作岗位，年纳税额2000余万元，已经多年被永兴县人民政府评为“税收贡献十强企业”。

公司秉承“贵以创新，研心致志”的经营理念，发展循环经济，着力建设环境友好型、资源节约型的现代化清洁生产企业，努力打造成为国内一流的贵金属综合回收企业。

同时，公司遵守国家/地区的环境、健康、安全和劳工法规，无环境处罚、无安全事故及劳动纠纷等情况。

Sino-Platinum Metals (Yong xing) Resources Co.,Ltd. (hereinafter referred to as "SPM (Yong xing)") was jointly established by Sino-Platinum Metals Co., Ltd. (hereinafter referred to as "SPM", stock code: 600459) and Chenzhou Caizhi Metal Co., Ltd. in January 2010, with a registered capital of RMB 50 million. The Company is located in Yongxing, Hunan Province, which has the reputation of "Silver Capital in China".

The Company is a high-tech enterprise specializing in precious metal refining, non-ferrous metal resource development and recycling, renewable resource recovery, production & operation of precious metals and R&D of testing technology thereof. The Company currently covers an area of 50 mu and has more than 100 employees.

The Company's existing products mainly include the pure metal products such as silver, gold, platinum, palladium, rhodium, iridium and ruthenium, as well as the by-products such as gold beads, silver beads and silver powder. It has 2,000t/a silver smelting production line, 1,500t/a silver electrolysis production line, 100t/a silver (metal content) scrap production line, 20t/a gold electrolysis production line and 5t/a platinum group metal production line, with an annual output value of more than RMB 6 billion.

Since its establishment, the Company has been rated as one of the top 50 non-ferrous metal enterprises in Hunan Province in terms of scale and benefit for many times, and selected as one of the top 100 industrial manufacturing enterprises in Hunan Province for 2 consecutive years. The silver of SPM silver with a purity of 99.99% by the national standard the main product of the Company, is recognized by Shanghai Gold Exchange and Shanghai Futures Exchange as a provider of standard silver ingots, belongs to the domestic first-class silver brand, is very popular in the market, and titled as "Top 20 User's Favorite Silver Brand" in China for 6 consecutive years.

So far, the Company has applied for 5 patents in total, including 2 authorized patents and 3 patents under substantive examination, and has passed the certification of ISO9001:2015 quality management system, ISO14001:2015 environmental management system, ISO45001:2018 occupational health and safety management system and three-level work safety standardization.

The Company has actively participated in a number of social public welfare undertakings and charities, and has gone deep into the rural grassroots to carry out targeted poverty alleviation and rural revitalization. The Company has created more than 100 jobs for the local people, with an annual tax payment of more than RMB 20 million, and has been rated as "Top Ten Enterprises with Tax Contribution" by the People's Government of Yongxing County for many years.

The Company adheres to the business philosophy of "innovation and determination", develops circular economy, focuses on building an environment-friendly and resource-saving modern cleaner production enterprise, and strives to become a first-class comprehensive recycling enterprise of precious metals in China.

At the same time, the company complies with the environment, health, safety and labor laws and regulations of the country/region, and there are no environmental penalties, safety accidents and labor disputes.

### 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：

我方已完全符合第1步：建立强有力的公司管理体系

#### **Compliance Statement:**

**In the year ended Dec. 31st 2023, we have fully complied with the requirement of Step 1: Establish strong company management systems.**

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公司政策 **Company Policy:**

合规陈述：

公司于2023年1月更新了《白银供应链管理政策》、《白银供应链尽职调查管理办法》以及《白银供应链风险减缓管理办法》，符合《经济合作与发展组织关于来自受冲突影响和高风险区域矿石的负责任供应链尽职调查指南》附件II的要求，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规则》中规定了内部的组织架构及责任、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。2023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.sino-platinum.com.cn>

#### Compliance statement:

The company updated the "Silver Supply Chain Management Policy", "Silver Supply Chain Due Diligence Rules" and "Silver Supply Chain Risk Mitigation Management Measures" in January 2023, meet the requirements of Annex II of the OECD Guidance on Responsible Supply Chain Due Diligence for Ores from conflict-affected and High-risk Regions. 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 Rules" 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 2023, 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.sino-platinum.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管理办法》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，四名合规主管和十名合规专员。公司的合规总监由李锟（

公司董事长)担任, 合规主管由田相亮(总经理)、李雄(副总经理)、刘莉(副部长)和管有祥(总经理助理)担任, 财务部合规专员由王振凯(财务部)担任, 市场营销部合规专员由韩守财、唐科、廖文芝、曹耀武(市场营销部)担任, 生产技术部合规专员由李丽健、袁源、李帼英(生产技术部)担任, 检测中心合规专员由彭鹏(检测中心)担任, 精炼车间合规专员由彭春生(精炼车间)担任。合规总监全面负责公司白银供应链尽职调查工作, 监督检查白银供应链尽职调查过程, 并评估尽职调查是否全面进行, 对已识别出风险的白银供应链或交易采取适当的措施降低风险直至消除风险, 如果存在高风险白银供应链或交易时, 应及时向公司高管层汇报并采取严格的控制措施, 负责审核和修订公司白银供应链相关方针政策等。

合规主管辅助合规总监安排并开展负责公司白银供应链尽职调查工作, 定期且参加对员工进行关于《中国负责任矿产供应链尽责管理指南》和供应链, 尽职调查政策培训, 并汇总上报公司内部员工对白银供应链尽职调查工作的意见和建议, 为合规总监履行尽职调查责任提供首要的准确信息等。

其他合规专员职责包括严格执行白银供应链尽职调查措施和高风险白银供应链评判标准, 负责收集并保存足够的白银供应链证明文件, 负责收集并督促进口商和出口商完成相应的尽职调查报告, 对主要国内客户进行现场调查等。

2023年, 公司严格执行《白银供应链尽职调查管理办法》, 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的结果进行审查, 所有的银物料采购合同都经过了财务合规专员的审批。

#### Compliance statement:

The company established an internal management system in accordance with the Silver Supply Chain Due Diligence Management Measures, clarified management positions and corresponding responsibilities, and established a Compliance Director, four Compliance Supervisors and ten Compliance Specialists. The Company's Director of compliance by Li Kun (Chairman), compliance supervisor by Tian Xiangliang(General Manager)、Li Xiong (Vice General Manager)、Liu Li (Vice General Manager) and Guan Youxiang (Assistant General Manager), The Financial Department compliance commissioner by Wang Zhenkai(Financial Department), The Marketing Department compliance commissioner by Han Shoucai, Tang Ke, Liao Wenzhi, Cao Yaowu (Marketing Department), The Production Technology Department compliance commissioner by Li Lijian, Yuan Yuan , Li Guoying( Production Technology Department), The testing center Department compliance commissioner by Peng peng(Testing Center Department),The Refining Plant Department compliance commissioner by Peng Chunsheng (Refining Plant Department).Compliance Director is fully responsible for the company's silver supply chain due diligence work, supervision and inspection of the silver supply chain due diligence process, and assess whether due diligence is fully conducted, take appropriate measures to reduce the risk of the silver supply chain or transactions that have identified risks until the risk is eliminated, if there is a high risk silver supply chain or transaction, should promptly report to the company's senior management and take strict control measures, responsible for reviewing and revising the company's silver supply chain policies and policies.

The Compliance Supervisor assists the Compliance Director in arranging and conducting due diligence work on the Company's Silver Supply Chain, regularly and participating in the Employees' Due Diligence Management Guide and Supply Chain for Responsible Mineral Supply Chains in China, due diligence policy training, and summarizing the comments and recommendations of the company's internal employees on the Silver Supply Chain Due Diligence, providing the Compliance Director with primary and accurate information on his due diligence responsibilities.

Other Compliance Officer responsibilities include strict implementation of silver supply chain due diligence measures and high-risk silver supply chain evaluation standards, collection and preservation of sufficient silver supply chain supporting documentation, collection and supervision of importers and exporters to complete appropriate due diligence reports, on-site investigation of key domestic customers, etc.

In 2023, the company strictly implemented the "Silver Supply Chain Due Diligence Rules" and conducted risk due diligence on suppliers. Monitored all transactions to avoid establishing relationships with high-risk suppliers. At the same time, the compliance officer reviews all due diligence findings and results, and all silver material procurement contracts are approved by the Financial Compliance Officer.

可追溯系统和其他供应链参与者的识别

#### Traceability and identification of other supply chainactors

合规陈述:

公司根据管理体系要求，确定了供应链追溯体系，在业务过程中，收集和保存所有供应商提供的信息，包括合同评审表、合同文本、结算方式、运输过程、重量和检验报告、生产日期、入库时间等。

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:

The company has developed a supply chain traceability system in accordance with the requirements of management system. During the business process, it collects and saves all information provided by suppliers, including contract review forms, contract texts, settlement methods, transportation processes, weight and analysis report, production date, storage time,etc.

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，现货国内及国际业务人员依据《白银供应链管理政策》要求，与所有白银供应合约对方签署《合规承诺书》，并进行《问卷调查》以确保他们了解公司白银供应链管理的要求、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，不存在强迫劳动的行为，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。同时，积极辅导供应商的尽职调查能力。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。

2023年度签约的所有供应商均签署了相关的承诺书。

#### Compliance statement:

When signing a contract with a supplier, according to the requirements of the "Silver Supply Chain Management Policy", the business personnel of the domestic and international business departments signed the "Compliance Commitment" with all counterparties of the silver supply contract, and conducted a "questionnaire survey" to ensure suppliers understand the company's silver supply chain 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 forced labour, 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. Meanwhile, we train our suppliers to improve their due diligence capabilities. 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 2023, All suppliers have signed the commitments.**

#### 交易监控 Transaction monitoring

##### 合规陈述:

根据管理体系要求，确保对白银供货商供应链上的风险进行交易监督。公司对收到的每批产品接收货运单据，重量单据，检验报告，发票等文本进行检查。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。2023年度的交易全部采用银行转帐方式，没有现金转帐。

#### Compliance statement:

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 other texts. 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 2023 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.sino-platinum.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，内外部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。2023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.sino-platinum.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 2023.

In addition, the company has also established a whistle-blower protection system to prevent retaliation against whistle-blowers and effectively protect the rights of whistle-blowers.

## 培 训 Training

合规陈述：

公司定期组织所有关于白银供应链管理相关部门进行培训，我公司于2022年启动LBMA项目，2023年度进行了2次培训，参与人员包括合规小组成员及供应链相关岗位人员。

2023年2月5日、6月5日，我们培训了LBMA对于白银供应链的政策要求，讲解了各相关部门如何贯彻执行有关政策，分别对LBMA指南、工具包、尽职管理政策、制度、流程、披露指南进行了培训，培训现场通过互动提问及答题的方式进行，达到了良好的培训效果。

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 supply chain management relevant departments to carry out the training, We launched the LBMA project in 2022, and twice training was performed in 2023, with participants including members of the compliance team and supply chain related positions.

1. January 5 and June 5, 2023, we train about LBMA's policy requirements for silver supply chain, and explain how the relevant departments implement the relevant policies, and train on LBMA guidelines, tool kits, due diligence policies, systems, processes, and disclosure guidelines, and the training site was conducted through interactive questions and answers, achieving good training results.

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办法》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：

我方已完全符合第2步：识别和评估供应链风险

#### **Compliance Statement:**

**In the year ended Dec. 31st 2023, We have fully complied with Step 2: Identify and assess risks in the supply chain.**

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管理办法》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公司的所有风险，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、强迫劳动、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、工人或员工情况、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。

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, forced labour, 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, worker or employee situation, 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.

## 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, 市场营销部门需要填写《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: 供应商需要提供采矿证许可证, 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, 部分供应商合规专员或风控官到现场调查信息的真实性, 以确保评估准确可靠。

再生银: 供应商需要提供营业执照, 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, 部分供应商合规专员或风控官到现场调查信息的真实性, 以确保评估准确可靠。收集和评估再生银供应商关于反洗钱-反恐怖主义融资的政策行动资料。

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、在白银供应链中的公司或其他已知的上游公司中存在强迫劳动的形迹或嫌疑。
- 8、中国政府认定的其它高风险情况。

公司根据《伦敦金银市场协会负责的白银指南》的要求和《经济合作与发展组织关于来自受冲突影响和高风险区域矿石的负责任供应链尽职调查指南》附件II的相关规定作为高风险供应链评判标准的主要依据, 同时参考多德-弗兰克法案相关条款、经中国政府认可的欧盟制裁清单、海德堡晴雨表、联合国人权事务办事处或同等机构、金融行动特别工作组(FATF)的报告、中国政府认可的国际制裁名单。

2023年对所有含银物料供应商进行了评估, 根据评估结果, 所有的供应商均判定低风险供应商。如果评估结果为高风险, 市场营销部将对该供应商每半年做一次强化尽职调查; 如果出现不可抗力, 无法去到现场进行尽职调查时, 将要求其上游供应商进行协助调查, 或采取远程视频监控调查取证。2023年没有高风险供应商, 所有没有发生现场强化尽职调查。

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 silver: suppliers need to provide mining licenses, business licenses, beneficiaries, credit, and financial information, whether they are on the government's money laundering, known fraudsters, or terrorist lists, etc., in addition, for high risk possibility suppliers, the compliance director or compliance officer shall go to the site to investigate the authenticity of the information to ensure that the assessment was accurate and reliable.

Recycled silver :suppliers need to provide business licenses, beneficiaries, credit, and financial information, whether they are on the government's money laundering, known fraudsters, or terrorist lists, etc., in addition, for high risk possibility suppliers, the compliance director or compliance officer shall go to the site to investigate the authenticity of the information to ensure that the assessment was accurate and reliable.

Collect and evaluate information on the policy actions of recycled silver suppliers on anti-money laundering-anti-terrorism financing

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. There is a pattern or suspicion of forced labour among companies in the silver supply chain or other known upstream companies.
8. Other high-risk situations identified by the Chinese government.

The company's evaluation criteria of high risk supply chain is mainly in according with the requirements of the London Bullion Market Association's Responsible Silver Guide and the OECD

Annex 2, also refer to the relevant provisions of the Dodd-Frank Act, the EU sanctions list approved by the Chinese government, the Heidelberg Barometer, the UN Human Rights Office or its equivalent, the reports of the Financial Action Task Force (FATF) and the international sanctions list approved by the Chinese government.

In 2023, all suppliers of silver-containing materials were evaluated, According to the assessment results, all suppliers are judged at low-risk level. If the assessment result is high risk, Marketing department will conduct enhanced due diligence on the supplier every six months; If force majeure is impossible to go to the site for enhanced due diligence, the Department will ask its upstream supplier to assist in the investigation or take remote video surveillance investigation. As no high-risk suppliers in 2023, no on-site investigation and inspection of high-risk suppliers was conducted in 2023.

#### 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**

合规声明:

我们完全符合第三步：设计和实施一项管理策略应对已识别的风险

**Compliance Statement:**

**In the year ended Dec. 31st 2023, We have fully complied with Step 3: Design and implement a management system to respond to identified risks.**

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：对低风险供应商的进行合作时，发现可疑的风险使该供应商可能变为中风险供应商，没有取得确定结果之前，暂停与该供应商合作，并调查该可疑风险，直至确定该供应商为低风险供应商，再依据评估结果进行处理。当评估结果为中风险时，需要暂停与该供应商的合作，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。在规定的2周期限内，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，则最后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，由最高管理层批准停止该供应商资格。

#### 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.

(ii) Mitigating risks when trading is suspended: When cooperating with a low-risk supplier, if a suspicious risk is found that may cause the supplier to become a medium-risk supplier, the cooperation with the supplier is suspended before a definitive result is obtained, and investigate the suspicious risk until it is determined that the supplier is a low-risk supplier, and then deal with it based on the evaluation results. When the evaluation result is medium risk, it is necessary to suspend the cooperation with the supplier and isolate the incoming materials. The company's silver warehouse has a high-risk incoming material isolation area to cope with unexpected situations. Within two-week period limit, the supplier shall take the action and submit the evidence, if the risk is removed, and the transaction is resumed. If the action plan fails to meet the requirements or the risk cannot be removed, the cooperation with the supplier is finally stopped.

(iii) Stop trading off risk: the evaluation of the supplier is high risk, or if a high-risk item is found when working with the supplier, then stop cooperation with the supplier, and submit the assessment report and high-risk items to the top management, who will approve the suspension of the supplier's qualification.

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：

量化手段和绩效评估：根据《白银供应商风险缓解管理办法》，如果尽职调查的结果处于低风险，但仍存在轻微不符合时，只要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材料。如果白银供应链尽职调查提交的资料不完善，或者不愿意配合的，这说明存在洗钱、恐怖主义融资、助长冲突、侵犯人权的行为可能性很高，我们将立即停止从其处获取白银原材料，直到其他信息或数据能证实其低风险。

根据2023年的尽职调查结果，所有供应商均为低风险，无供应商需要进行风险缓解的管理策略，也无供应商终止合作。

#### 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，其中出入库必须有仓库合规专员的签字，付款必须有财务的合规专员的批准。

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

2023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。

Compliance statement:

Measures steps and performance monitoring: According to the "LBMA Risk Mitigation Strategy", if the result of due diligence is at a low risk, but there is still a minor non-compliance, as long as the company adopts an improvement strategy with clear performance targets within the specified time frame, we will continue to obtain silver raw materials from them. If the due diligence information submitted by the silver supply chain is incomplete or unwilling to cooperate, it means that there is a high possibility of money laundering, terrorist financing, conflict promotion, and human rights violations. We will immediately stop obtaining silver raw materials from them. Until other information or data can confirm they have low risk status.

According to the results of the due diligence in 2023, all suppliers were assessed as low risk, no supplier needs a risk mitigation management strategy. There are also no suppliers terminating the cooperation.

Regular re-evaluation and continuous monitoring:

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.

Each batch of purchased silver raw materials is monitored by a compliance officer during the transportation, storage, production, and payment process. Among them, the deposit and withdrawal must be signed by the escort compliance officer, and the payment must have financial compliance officer's approval.

Periodic report: Every quarter, the compliance officer submits reports to the compliance director and top management according to the actual situation of silver supply chain management. The report summarizes the quarterly operation of the silver supply chain management system, proposes deficiencies and improvement measures.

In 2023, 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.

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**

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:

本年度我司编写了截至2023年12月31日的合规报告，**请务必维认证(北京)有限公司进行合理鉴证。**

**Compliance statement:**

**We have prepared the annual compliance report ended on December 31, 2023. 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.sino-platinum.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.sino-platinum.com.cn>.

## Part IV 第四部分

### Conclusion 结论

管理层结论 **Management conclusion**

我司在截至2023年12月31日的年度报告中，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 on 31 December 2023.



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 Silver 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+86-07357771828或发送电子邮件至yygy20232023@163.com与我们联系。

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