

深圳市粤鑫贵金属有限公司

黄金、白银供应链尽职调查规则

Due Diligence Rules of Gold and Silver Supply Chain of Shenzhen Yuexin Precious Metals Co., Ltd.

1、适用范围

1. Scope of application

本黄金、白银供应链尽职调查规则，适用于深圳市粤鑫贵金属有限公司、以及与深圳市粤鑫贵金属有限公司有黄金/白银交易，黄金/白银加工的所有黄金/白银供应商，黄金/白银相关合作伙伴。（包括黄金/白银生产商、中间商、贸易商、出口商和运输商。）

The Due Diligence Rules of Gold and Silver Supply Chain are applicable to Shenzhen Yuexin Precious Metals Co., Ltd. and all gold/silver suppliers and gold/silver-related partners who have gold/silver transactions and gold/silver processing with Shenzhen Yuexin Precious Metals Co., Ltd. (including gold/silver manufacturers, middlemen, traders, exporters and transporters.)

2、公司内部组织架构及责任

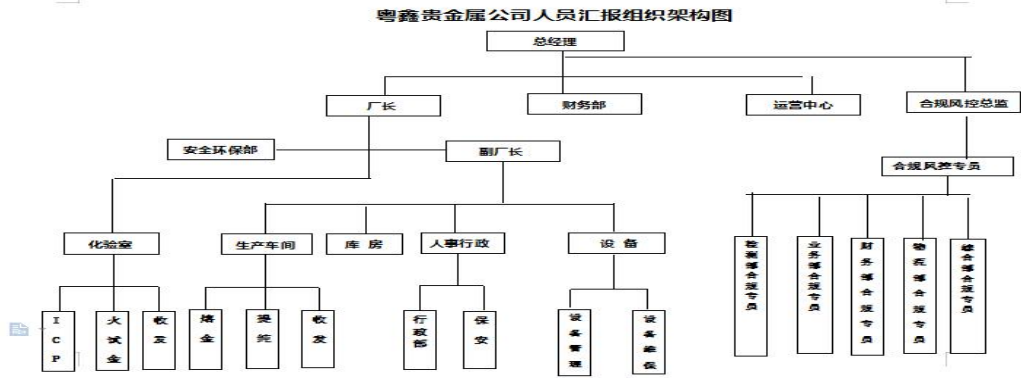
2. Internal organizational structure and responsibilities of the Company

2.1 黄金、白银供应链公司内部组织架构

2.1 Internal organizational structure of the Company for gold and silver supply chain

深圳市粤鑫贵金属有限公司为黄金、白银供应链尽职调查设立了专门的组织，组织架构如下：

Shenzhen Yuexin Precious Metals Co., Ltd. has set a special organization for the due diligence of gold and silver supply chains. The organizational structure is as follows:



粤鑫贵金属公司人员汇报结构组织架构图	Organizational Chart of Personnel Reporting Structure of Yuexin Precious Metals Co., Ltd.
总经理	General Manager
厂长	Factory Director
副厂长	Deputy Factory Director
安全环保部	Safety and Environmental Protection Department
化验室	Testing Laboratory
火试金	Fire assaying
收发	Mail Room
熔金	Molten gold
提纯	Refinement
生产车间	Manufacturing workshop
库房	Warehouse
人事行政	Personnel Administration
行政部	Administration Department
保安	Security
设备管理	Equipment management

设备维保	Equipment Maintenance
设备	Equipment
财务部	Accounting department
运营中心	Operation Center
合规风控总监	Compliance Risk Control Director
合规风控专员	Compliance Risk Control Officer
检测部合规专员	Compliance Officer of the Inspection Department
业务部合规专员	Compliance Officer of the Business Department
财务部合规专员	Compliance Officer of the Accounting Department
物流部合规专员	Compliance Officer of the Logistics Department
综合部合规专员	Compliance Officer of the General Department

2.2 黄金、白银供应链公司管理体系建设与内部组织责任

2.2 Management system construction and internal organizational responsibility of the Company for gold and silver supply chain

公司严格遵守 LBMA 黄金、白银责任指南第一步“建立强大的公司管理体系”的要求，已经建立了强大的管理体系，确保供应链尽职调查工作全面落实。公司通过并出台了一项供应链尽职调查政策，该政策符合经合组织《来自受冲突影响和高风险地区矿石负责任供应链尽职调查指南》，并扩展至环境和可持续性责任。

The Company strictly follows the requirements of “establishing strong company management systems” in Step 1 of LBMA Responsible Gold and Silver Guidance and has established strong management systems to ensure the full implementation of supply chain due diligence. The Company has approved and issued a supply chain due

diligence policy, which is in line with the OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and extends to environmental and sustainability responsibilities.

公司根据《LBMA 负责任的黄金（白银）指南》制订了《供应链尽职管理办法》、《供应链尽职管理政策》，明确供应链尽职调查组织架构、职责、高风险地区定义，制定高风险供应链评估标准、调查处理程序、交易监控、文件保存等内容。

The Company has formulated the *Supply Chain Due Diligence Management Measures* and *Supply Chain Due Diligence Management Policy* according to the *LBMA Responsible Gold (Silver) Guidance* stipulating the organizational structure, responsibilities and definition of high-risk areas of supply chain due diligence and developed high-risk supply chain evaluation standards, investigation and handling procedures, transaction monitoring, document preservation, etc.

公司建立了一套供应链可追溯体系，收集和维护每一批产品的供应链信息，为每一批出库的产品分配唯一编号，并可通过二维码进行溯源。所有的供应商都会被进行资信调查，资信调查通过后签订合同，约定原料合法符合 LBMA 尽职调查政策。供应商送的每一批来料，都有入库单，表明产品类型、重量、验收人员和供应商签字确认，经熔炼取样化验，最后形成标准金银产品，分配唯一编号，通过上海黄金交易所进行交易。

A set of supply chain traceability systems has been established by the Company to collect and maintain the supply chain information of each batch of products, assign a unique number to each batch of ex-warehouse products, and trace the source through QR code. All suppliers will be subject to credit investigation. After the credit investigation is passed, a contract will be signed to stipulate that the raw materials are legal and meet the requirements of LBMA due diligence policy. With regard to each batch of incoming materials sent by the supplier, the materials shall be provided with in-warehouse sheets indicating the product type, weight, acceptance personnel and the supplier's signature for confirmation. After smelting, sampling and testing, the standard gold and silver products are finally formed with a unique number and can be traded through the Shanghai Gold Exchange.

公司设置的合规风控总监、合规风控专员、部门合规专员职责如下：

The responsibilities of the Compliance Risk Control Director, Compliance Risk Control Officer and Compliance Officer of Department set by the Company are as follows:

深圳市粤鑫贵金属有限公司授权的高级管理者：王镇城

**Authorized Senior Manager of Shenzhen Yuexin Precious Metals Co., Ltd.:
Wang Zhencheng**

合规风控总监对黄金、白银供应链上的所有事情负责，负责监督供应链尽职调查的实施与改进，确保在供应链交易时采取恰当的措施，提交风险评估报告。

The Compliance Risk Control Director is responsible for all matters in the gold and silver supply chain, such as supervising the implementation and improvement of supply chain due diligence to ensure that appropriate measures are taken in supply chain transactions and the risk assessment report is submitted.

(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。

(1) Have the right to supervise the due diligence process of the gold and silver supply chain and evaluate whether the due diligence is adequately performed. Have the right to request additional documents or information if deemed necessary.

(2) 如存在高风险供应链或交易，需要及时向集团分管领导汇报。

(2) Timely report to the leader in charge of the group if there is a high-risk supply chain or transaction.

(3) 每年组织一次对员工进行黄金、白银供应链规则的培训，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。

(3) Organize training on gold and silver supply chain rules for employees once a year, draft and update gold and silver supply chain rules, and provide accurate information for senior management to fulfill responsibilities.

(4) 每年安排风险合规专员至少一次对重要客户及潜在的高风险客户进行现场调查。

(4) Assign the Risk Compliance Officer to conduct on-site investigation on important customers and potential high-risk customers at least once a year.

(5) 协助与鼓励黄金/白银原料供应商及黄金/白银交易客户承诺遵守黄金/白银供应链尽职规则。

(5) Assist and encourage gold/silver raw material suppliers and gold/silver trading customers to make a commitment to conform to the gold/silver supply chain due diligence rules.

(6) 建立完善的管理体系，并对供应商采纳的尽职调查实践聘用独立的第三方进行审计。

(6) Establish a sound management system and employ an independent third party to audit due diligence practices approved by suppliers.

(7) 负责起草内部的 LBMA 供应链尽职管理合规报告。

(7) Take charge of drafting internal LBMA supply chain due diligence management compliance report.

2.2.2 合规风控专员

2.2.2 Compliance Risk Control Officer

深圳市粤鑫贵金属有限公司授权的合规风控专员：杨培茹

Authorized Compliance Risk Control Officer of Shenzhen Yuexin Precious Metals Co., Ltd.: Yang Peiru

合规风控专员其职责为定期根据合规审核流程，针对已识别的风险实施应对策略，为合规风控总监履责提供准确的信息。

The Compliance Risk Control Officer is responsible for regularly implementing corresponding strategies for identified risks in accordance with the compliance audit process and providing accurate information for the Compliance Risk Control Director to fulfill his/her responsibilities.

(1) 收集、整理 LBMA 供应链相关数据，配合合规风控总监完成日常合规报告。

(1) Collect and sort out LBMA supply chain-related data and cooperate with the Compliance Risk Control Director to complete the daily compliance report.

(2) 做好供应链风险识别评估，风险评估建立相关人员职责。

(2) Implement the supply chain risk identification and assessment and fulfill the responsibility of relevant personnel related to risk assessment establishment.

(3) 不定时上报员工对黄金、白银供应链或者任何新确认的风险的建议和意见，并提出自己的意见。

(3) Report suggestions and opinions of employees on gold and silver supply chains or any newly identified risks from time to time and put forward their own opinions.

2.2.3 业务部合规专员

2.2.3 Compliance Officer of Business Department

深圳市粤鑫贵金属有限公司授权的业务部合规专员：蔡晓彬

Authorized Compliance Officer in Business Department of Shenzhen Yuexin Precious Metals Co., Ltd.: Cai Xiaobin

业务部合规专员负责收集与保存足够的供应链的证明文件，如供应商营业执照、采矿许可证、身份证复印件，黄金、白银采购合同、供应商社会责任承诺书等。

The Compliance Officer of Business Department is responsible for collecting and keeping sufficient supporting documents of the supply chain, such as copies of the supplier's business license, mining license, ID card, gold and silver purchase contracts, supplier's social responsibility commitment letter, etc.

（1）负责原材料采购，确保黄金/白银原料供应的稳定性、安全性，并拒绝与高风险地区的相关企业、组织或国家合作。

(1) Take charge of purchasing raw materials to ensure the stability and security of gold/silver raw material supply and refusing to cooperate with relevant enterprises, organizations or countries in high-risk areas.

（2）业务部需对交货人身份信息进行确认，并在交易过程中采用监督机制确保交易的安全性，保证公司不参与恐怖主义融资。

(2) The Business Department shall confirm the identity information of the free carrier and adopt a supervision mechanism during the transaction to guarantee the security of the transaction and ensure that the Company does not involve terrorist financing.

（3）评估和识别供应链风险，报告供应链尽职调查的情况。

(3) Assess and identify supply chain risks and report the conditions of supply chain due diligence.

（4）每年至少一次对重要客户（年供应量达到 1000kg）进行现场调查；

(4) Conduct on-site investigation on important customers (annual supply up to 1000kg) at least once a year;

（5）协助与鼓励现货黄金/白银供应商承诺且书面确认遵守黄金/白银供应链尽职规则；

(5) Assist and encourage spot gold/silver suppliers to commit and confirm in writing to comply with the gold/silver supply chain due diligence rules;

(6) 如出现异常情况需及时向合规风控总监报告。

(6) Timely report to Compliance Risk Control Director in case of any abnormal situation.

2.2.4 财务合规专员

2.2.4 Financial Compliance Officer

深圳市粤鑫贵金属有限公司授权的财务部合规专员：庄晓纯

Authorized Compliance Officer in Financial Department of Shenzhen Yuexin Precious Metals Co., Ltd.: Zhuang Xiaochun

财务部合规专员其职责为完整保存所有客户的交易凭证。

The Compliance Officer in the Financial Department is responsible for keeping the transaction vouchers of all customers in full.

(1) 对供应链合同价格、原料金/银与成品金/银的出入库数据进行财务入账，做好相关发票、付款凭证归档备案。

(1) The Compliance Officer should conduct the financial entry of the in-and-out-of-storage data of the supply chain contract prices, raw material gold/silver and finished gold/silver products, and take care of the filing and recording of relevant invoices and payment vouchers.

(2) 防范相应的财务风险，并在发现风险时及时向合规风控总监汇报。

(2) The Compliance Officer should prevent corresponding financial risks and report risks (if any) to the Compliance Risk Control Director timely.

(3) 定期对公司生产车间与收发库房进行金银物料出入库数量盘点。月末财务人员正式盘点前，收发库管人员须对库存金银料进行预盘，每月财务人员盘点后，要求收发与统计员每月月末出具盘点对帐，编制盘点表。

(3) The Compliance Officer should regularly check the in-and-out-of-storage inventory of gold and silver materials for the Production Workshop and the incoming and outgoing warehouse of the Company. Before the official inventory by financial personnel at the end of each month, the incoming and outgoing warehouse managers must carry out pre-inventory of gold and silver materials in stock. After the inventory by financial personnel every month, warehouse managers are required to issue the inventory reconciliation statement with the statistical clerk at the end of each month and prepare the inventory lists.

(4) 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。

(4) Transaction vouchers include but are not limited to: in-and-out-of-storage sheet and relevant legal qualification proof of customers, etc. The records must be kept for at least 5 accounting years.

2.2.5 物流合规专员

2.2.5 Logistical Compliance Officer

深圳市粤鑫贵金属有限公司授权的物流合规专员：蔡纯浩

Authorized Logistical Compliance Officer of Shenzhen Yuexin Precious Metals Co., Ltd.: Cai Chunhao

物流合规专员其职责为选择符合黄金、白银运输资质要求的运输公司、保险公司。

The Logistical Compliance Officer is responsible for selecting transport companies and insurance companies meeting the gold and silver transport qualification requirements.

(1) 建立供应链追溯系统，收集并维护每一批次来料的供应链信息，包括为每一批次输入及输出分配一个单独参考编号：

(1) A supply chain tracing system should be established and the supply chain information of all incoming batches should be collected and maintained, including the allocation of the independent reference number for all inputs and outputs:

a) 黄金/白银产品向上追溯（黄金/白银—原料）

a) Tracing up of gold/silver products (gold/silver - raw materials)

-含金/银物料类型（矿产黄金/白银、再生黄金/白银）；

-- Gold/silver-containing material type (mined gold/silver, recycled gold/silver);

-入库重量和分析报告；

--Storing weight and analysis reports;

-原料入库日期和成品入库日期；

-Raw material storing date and finished product storing date

b) 黄金/白银产品向下追溯（黄金/白银—顾客）

b) Tracing down of gold/silver products (gold/silver-customers)

-顾客信息；

-Customer information;

-交易重量和分析报告；

-Transaction weight and analysis reports;

-出库日期。

-Delivery date.

（2）按要求保存每一批料的运单、保单，并跟踪运单情况，确定运输公司或保险公司运输路线；

(2) The shipping documents and insurance policies of all incoming batches should be kept as specified and the shipping documents should be traced with the transport route of the transport company or insurance company determined;

（3）如出现异常情况需及时向合规风控总监报告。

(3) Any abnormalities (if any) must be reported to the Compliance Risk Control Director timely.

2.2.6 综合部合规专员

2.2.6 Compliance Officer of General Affairs Department

深圳市粤鑫贵金属有限公司授权的综合部合规专员：郭亚文

Authorized Compliance Officer in General Affairs Department of Shenzhen Yuexin Precious Metals Co., Ltd.: Guo Yawen

负责日常来料管理，征集各部门与员工意见，整理收集相关资料。

The Compliance Officer is responsible for incoming management, collecting opinions from various departments and the staff, sorting and collecting relevant data.

2.2.7 检测部合规专员

2.2.7 Compliance Officer of Testing Department

深圳市粤鑫贵金属有限公司授权的检测部合规专员：甘文波

Authorized Compliance Officer in Testing Department of Shenzhen Yuexin Precious Metals Co., Ltd.: Gan Wenbo

负责所有来料与生产样的检测工作，确保检测的及时性和准确性，并保存好检测单据。

The Compliance Officer is responsible for testing all incoming materials and manufactured samples, guaranteeing the timeliness and accuracy of the test and keeping test documents well.

3、高风险黄金、白银供应链评判标准

3. High-risk gold and silver supply chain evaluation criteria

3.1 高风险黄金、白银供应链注意事项

3.1 Precautions for high-risk gold and silver supply chains

1、与黄金/白银开采、运输和交易有关的系统化、广泛化的侵犯人权行为，强制劳役、童工、残酷，非人道和羞辱虐待；

1. Systematic or widespread abuses of human rights related to gold/silver mining, transport and transaction, forced labor, child labor, torture, inhuman and degrading treatment;

2、有战争犯罪，违反国际人权法，人权犯罪或种族屠杀；

2. War crimes, violations of international human rights laws, crimes related to human rights or ethnic cleansing;

3、直接或间接的支持非政府武装集团、公共或私人安全部队，购买贵金属或提供协助的（参考 OECD 冲突影响地区和高风险地区矿产供应链尽职调查指南黄金、白银附录中的定义）；

3. Purchasing precious metals or assistance for direct or indirect support for non-governmental armed groups, public or private security forces (refer to definitions in the Gold and Silver Appendix to OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas);

4、贿赂而来或者是掩盖黄金、白银真实来源；

4. Acquisition of gold or silver through bribery or concealing the origin of gold or silver;

5、存在洗钱或自高风险、冲突地区采购贵金属；

5. Purchasing precious metals from areas with money laundering or inherent high risks or areas of conflict;

6、存在恐怖主义融资；

6. Existence of terrorist financing;

7、存在加剧冲突；

7. Existence of intensified conflicts;

8、可能开采黄金利用汞生产而得；

8. Utilization of mercury production for mining gold;

9、可能不遵守环境和可持续发展法律要求，开采黄金源于世界遗产遗址或国内生态自然保护区；

9. Possibility of violating legal requirements concerning environmental protection and sustainable development, gold mining from world heritage sites or domestic ecological natural reserves;

10、存在矿产资源开发过程中引起的土壤侵蚀、水土流失、土地沙漠化。地面沉降、塌陷，山体崩塌、滑坡、泥石流等地质灾害；

10. Existence of soil erosion, water and soil loss, land desertification, land subsidence, collapse, mountain collapse, landslide, debris flow and other geological disasters arising from the development of mineral resources;

11、存在废渣、废水、废气排放对水体、土壤、空气的污染。对野生动植物资源和自然地质地貌景观的破坏、危及公民健康和财产损失。

11. Existence of water, soil and air pollution due to waste residues, wastewater and water gas, destruction of wild animal and plant resources and natural geomorphological landforms, citizens' health endangered and property loss.

3.2 黄金、白银供应链高风险类别标准

3.2 High-risk gold and silver supply chain classification criteria

1、矿产金银或再生金银来源于、中转或者运经冲突影响或侵犯人权高风险地区。

1. Mined gold/silver or recycled gold/silver originates from, is transferred via or passes areas impacted by conflicts or with high risks of human rights abuse.

2、矿产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。

2. Mined gold and silver are said to originate from a country that is known or expected with limited reservoirs or yield.

3、再生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。

3. Recycled gold and silver originate from known areas impacted by conflicts and with high risks of human rights abuse, or are reasonably suspected to be transferred via such areas.

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。

4. Companies on the gold and silver supply chains or other known upstream companies are located in a country with high risks of money laundering, crimes and corruption.

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。

5. The beneficiaries of companies on the gold and silver supply chains or other known upstream companies are politically sensitive.

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。

6. Companies on the gold and silver supply chains or other known upstream companies are actively involved in high-risk business activities, e.g., weapons, gambling, gaming industry, antiques, artworks, diamonds, religion and religious leaders.

7、在黄金、白银供应链中公司或其他已知的上游公司存在侵犯职工权利、环境保护等各项法律法规的情况。

7. Companies on the gold and silver supply chains or other known upstream companies infringed the rights of employees and violated environmental protection and other laws and regulations, etc.

3.3 黄金、白银供应链公司内部评估等级（见附件 LBMA 供应链风险评估表及风险缓解管理办法）

3.3 Internal class rating of companies on gold and silver supply chains (See Annex LBMA Supply Chain Risk Assessment Form and Risk Mitigation Management Measures)

4、黄金、白银供应链尽职调查规定

4. Provisions on due diligence of gold and silver supply chain

4.1 黄金、白银供应链尽职调查措施

4.1 Due diligence measures of gold and silver supply chain

公司内部对所有黄金白银交易、黄金白银加工的所有黄金白银供应商、黄金白银相关合作伙伴，建立相应的黄金、白银供应链尽职调查措施，并在交易时明确告知。黄金、白银供应链尽职调查措施主要包含：

The Company has established corresponding due diligence measures for gold and silver supply chain for all gold and silver suppliers and gold and silver related partners engaged in gold and silver transactions and gold and silver processing, and clearly inform them at the time of transaction. The due diligence measures of gold and silver supply chain mainly include:

1、建立供应链客户档案。包括：名称、法定代表人、地址、联系方式、运营方式、交易合同等。

1. Establish supply chain customer files, including: name, legal representative, address, contact information, operation mode, transaction contract, etc.

2、对既有供应链客户需定期进行核查，如有新建及变更的客户，需及时对其进行档案资料核查，并更新档案资料库。

2. Check the existing supply chain customers regularly. Check the archives in time and update the archives database if there are new and changed customers.

3、确定供应链的每一客户不在任何政府的洗钱、诈骗或恐怖主义通缉名单上。

3. Ensure that each customer in the supply chain is not on any government's money laundering, fraud or terrorism wanted list.

4、定期获取供应链客户经营状况（包括商业与财务详情）及交易目的信息。

4. Regularly obtain information on the operation status (including commercial and financial details) and transaction purpose of supply chain customers.

4.2 矿产金银客户

4.2 Mined gold and silver customers

矿产金、银客户，在交易时，需注意以下问题，同时告知客户：

For customers of mineral gold and silver, it is needed to pay attention to the following problems and inform customers at the same time:

1、必须获得黄金、白银的产地来源信息；

1. Obtain origin information of gold and silver;

2、提供采矿许可证；

2. Provide mining license;

3、提供进/出口黄金、白银许可证；

3. Provide import/export licenses for gold and silver;

4、采矿情况信息证明，包括：是否侵犯人权、是否违规操作等；

4. Provide evidence of mining information, including whether human rights are violated, whether illegal operations are carried out, etc.;

5、开采能力数据；

5. Mining capacity data;

6、公司会持续不断的对矿产金、银客户进行尽职调查。

6. The Company will continue to conduct due diligence on mined gold and silver customers.

4.3 自手工矿和小型矿的矿产金、银客户

4.3 Gold and silver customers from artisanal mines and small mines

自手工矿和小型矿的矿产金、银客户，在交易时，需注意以下问题，同时告知客户：

For gold and silver customers from artisanal mines and small mines, it is needed to pay attention to the following problems and inform customers at the same time during transaction:

1、该手工/小型矿是否合法，提供相关资质证书；

1. Whether the manual/small mine is legal; Provide relevant qualification certificates;

2、黄金、白银不是来自于合法的手工/小型矿时，公司会采取保障措施（如：拒绝向其采购或马上暂停或中断与其来往，待其变为合法时再与其来往）；

2. When gold and silver do not come from legal manual/small mines, the Company will take safeguard measures (such as refusing to purchase from them or suspending or interrupting their contacts immediately, and then dealing with them when they become legal);

3、公司会持续不断的对手工/小型矿客户进行尽职调查。

3. The Company will continuously conduct due diligence on manual/small mine customers.

4.4 回收金银客户

4.4 Customers of recycled gold and silver

回收金、银客户，在交易时，需注意以下问题，同时告知客户：

For customers of recycled gold and silver, it is needed to pay attention to the following problems and inform customers at the same time:

1、再生金、银供应商需提供合法的商业关系，包括：再生金、银来源证明、收益人证明等；

1. Customers of recycled gold and silver shall provide legal business relations, including: certificate of source of recycled gold and silver, certificate of beneficiary, etc.;

2、公司会持续不断的对再生金、银客户进行尽职调查。

2. The Company will continue to conduct due diligence on customers of recycled gold and silver.

4.5 高风险情况处理步骤

4.5 Handling steps for high-risk situations

通过风险等级判断，出现高风险情况时，公司将采取以下步骤进行处理：

Judging from the risk level, the Company will take the following steps to deal with high-risk situations:

1、现场调查/访问高风险供应链，证实供应链尽职调查文件记录的调查结果。

1. On-site investigation/visit to high-risk supply chain to confirm the findings recorded in the supply chain due diligence document.

2、对于大规模开采的黄金、白银：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、中间商、交易商、出口商和运输商）的收益所有人和政府监控名单信息都要求要核实。

2. For gold and silver mined on a large scale: Documents, data and information from credible and independent sources are used to verify the situation. From mines to refineries, the income owners and government monitoring list information of every company in the supply chain (including gold and silver producers, intermediaries, traders, exporters and transporters) are required to be verified.

3、对于手工/小型矿开采的黄金、白银：使用可靠的独立来源的文件、数据和信息来核实情况，从黄金、白银出口商到精炼厂，供应链中每一家公司（包括国际黄金、白银交易商和运输商）的收益所有人和政府监控名单信息都要求要核实。

3. For gold and silver mined by manual/small-scale mines: Documents, data and information from reliable independent sources are used to verify the situation. From gold and silver exporters to refineries, the income owner and government monitoring list information of every company in the supply chain (including international gold, silver dealers and transporters) are required to be verified.

4、对于回收金、银：使用可信的独立来源的文件、数据和信息来核实情况，从黄金、白银供应方到精炼厂，供应链中每一家公司（包括运输商）的收益所有人和政府监控名单信息都要求要核实。

4. For the recycled gold and silver: Documents, data and information from credible and independent sources are used to verify the situation. From the gold and silver suppliers to the refineries, the income owners and government monitoring list information of each company in the supply chain (including transporters) are required to be verified.

5、黄金、白银供应链交易监控

5. Gold and 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。

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

因此，公司对每一批收到的黄金、白银获取并记录以下信息：

Therefore, the Company obtains and records the following information for each batch of gold and silver received:

5.1 原生金银

5.1 Mined gold and silver

1、预估的重量和化验结果（来自供应方）。

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

2、航运/货运单据（运货/空运单、形式发票）。

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

3、高风险交易的进出口表格。

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

5.2 回收金银

5.2 Recycled gold and silver

1、预估重量（来自供应方）。

1. Estimated weight (from the supplier).

2、航运/货运单据（运货/空运单、形式发票）。

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

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。

3. In case of high-risk transaction of recycled gold and silver, the Company must require customers to provide corresponding documents for mutual confirmation, verify whether the documents are true and consistent, and conduct transaction background investigation. In case of inconsistency, it is necessary to conduct investigation and obtain written investigation results.

每年各部门合规专员需向合规风控专员提交风险评估报告，由合规风控专员向合规风控总监提交汇总后的风险评估报告。

The Compliance Officer of each department shall submit the risk assessment report to the Compliance Risk Control Officer every year, and the Compliance Risk Control Officer shall submit the summarized risk assessment report to the Compliance Risk Control Director.

公司合规风控总监与高级管理层通过风险评估包括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。

The Compliance Risk Control Director and senior management of the Company approve each supply chain assessed as high risk through risk assessment, and re-decide whether to continue to maintain business relationship with it every year.

6、黄金、白银供应链尽职调查文件记录保存

6. Retention of due diligence documents and records of gold and silver supply chain

公司要保存足够的供应链的证明文件记录，按照供应链尽职调查系统的标准来评判风险的要求，来证明充分且持续的完成了尽职调查。记录保存至少 5 个会计年度。

The Company has kept sufficient supporting documents and records of the supply chain, judge the risk according to the standards of the supply chain due diligence system, and prove that the due diligence has been fully and continuously completed. Records shall be kept for at least 5 fiscal years.

7、黄金、白银供应链尽职培训

7. Gold and silver supply chain due diligence training

公司每年会对黄金、白银供应链中的所有员工进行该规则的培训。并将培训计划纳入公司年度培训计划当中。

The Company will train all employees in the gold and silver supply chain on the rules every year. In addition, it is needed to incorporate the training plan into the Company's annual training plan.

7.1 培训要求

7.1 Training requirements

所有员工必须参加，并通过培训签到的形式进行相关培训确认。

All employees must attend and confirm relevant training in the form of training sign-in.

7.2 培训方式

7.2 Training methods

采用内训讲解授课方式，讲师由合规风控总监指定，人力资源部配合安排。

Internal training and explanation are adopted. The lecturer is designated by the Compliance Risk Control Director and arranged by the Human Resources Department.

7.3 培训反馈

7.3 Training feedback

培训后，由基层管理者进行培训效果检查。检查不合规者，进行再培训。再培训名单由基层管理者提供。

After the training, the grass-roots managers shall check the training effect. It is needed to check the non-compliance and conduct retraining. The retraining list shall be provided by grass-roots managers.

7.4 培训档案

7.4 Training files

培训后，需建立相应培训档案。记录保存至少 5 个会计年度。

After training, corresponding training files shall be established. Records shall be kept for at least 5 fiscal years.

8、黄金、白银供应链违规申诉通讯机制

8. Gold and silver supply chain violation complaint 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申诉，再由合规风控专员向合规风控总监进行邮件及电话申诉。

All internal gold and silver supply chain related staff of the Company shall timely appeal by email and telephone to the compliance officers of their respective sectors. If they find violations, and then the Compliance Risk Control Officer shall appeal by email and telephone to the Compliance Risk Control Director.

序号 No.	职位 Position	姓名 Name
1	合规风控总监 Compliance Risk Control Director	王镇城 Wang ZhengCheng
2	合规风控专员 Compliance Risk Control Officer	杨培茹 YangPeiRu
3	业务部合规专员 Compliance Officer of Business Department	蔡晓彬 CaiXiaoBin
4	财务部合规专员 Compliance Officer of Financial Department	庄晓纯 Zhuang XiaoChun
5	物流部合规专员 Compliance Officer of Logistics Department	蔡纯浩 CaiChunHao
6	综合部合规专员 Compliance Officer of General Affairs Department	郭亚文 GuoYaWeng
7	检测部合规专员 Compliance Officer of Testing Department	甘文波 GanWenBo

Shenzhen Yuexin Precious Metals Co., Ltd.

行政部

Administration Department

2021 年 1 月 9 日

January 9, 20201