

深圳市粤鑫贵金属有限公司

供应链管理政策

Supply Chain Management Policy of Shenzhen Yuexin Precious Metals Co., Ltd.

深圳市粤鑫贵金属有限公司作为伦敦金银交易市场协会（LBMA）的申请认证会员，为全面实施 OECD 关于在冲突地区及高危地区供应链尽职调查指导方针，我公司现已推行 LBMA RGG 和 RSG 尽责管理体系。

Shenzhen Yuexin Precious Metals Co., Ltd. is applicant for gold and silver good delivery status of the London Bullion Market Association (LBMA) and has implemented the LBMA RGG and RSG due diligence management system to fully implement the OECD due diligence guidelines for supply chains from conflict-affected and high-risk areas.

为配合我公司 LBMA RGG 和 RSG 体系的顺利执行，各供应商应遵守 LBMA RGG 和 RSG 管理体系的各项要求，并承诺向我公司提供的所有类别黄金、白银产品的收购均为合法，不涉及以下情况：

To cooperate with the smooth implementation of our LBMA RGG and RSG system, all suppliers shall comply with the requirements of the LBMA RGG and RSG management system and promise that the acquisition of all types of gold and silver products provided to our

company is legal without involving the following circumstances:

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.

我公司认可的合格供应商提供的黄金、白银产品必须符合 LBMA RGG 和 RSG 管理体系的各项要求，公司的相关对接部门须认真核实供应商信息，建立供应商信息管理档案，并不定期考察评估供应商风险。

Gold and silver products provided by qualified suppliers recognized by us must comply with various requirements in the LBMA RGG and RSG management system. The relevant responsible departments of the Company must carefully check the suppliers' information, establish the supplier information management files and irregularly investigate and evaluate the risks of suppliers.

根据《LBMA 负责任的黄金指南》、《LBMA 负责任的白银指南》对与深圳市点金贵金属精炼有限公司有黄金与白银交易、黄金与白银加工的所有黄金与白银供应商、黄金与白银相关合作伙伴进行以下风险等级分值设定（见附件一）。

All gold and silver suppliers and relevant silver partners related to Shenzhen Yuexin Precious Metals Co., Ltd. concerning gold and silver trading and processing must receive the following risk level scores according to *LBMA Responsible Gold Guidance and LBMA Responsible*

Silver Guidance (see Annex I).

根据风险分值，公司对与深圳市粤鑫贵金属有限公司有黄金与白银交易、黄金与白银加工的所有黄金与白银供应商、黄金与白银相关合作伙伴达到以下分值，分别采取不同的风险终止办法（见附件二）。

According to the risk scores, the Company will take different risk termination approaches once all gold and silver suppliers and relevant silver partners related to Shenzhen Yuexin Precious Metals Co., Ltd. concerning gold and silver trading and processing reach the following scores (see Annex II).

请各供应商自觉遵守以上制度，并与我公司签订《供应商社会责任承诺书》（见附件三）。

All suppliers are expected to observe the above system and sign the Suppliers' Social Responsibility Commitment Letter (see Annex III).

本管理政策自发布之日实施

The Management Policy shall be implemented upon the date of issuance.

深圳市粤鑫贵金属有限公司

Shenzhen Yuexin Precious Metals Co., Ltd.

2021 年 1 月 9 日

January 9, 2021

附件一：风险等级分值

Annex I: Risk Level Scores

序号 S/N	评估方 Assessed by	评估内容 Assessment content	分值 Score
1	商业交易方 (含银行) Business counterparty (including banks)	1.1 相关营业执照等 1.1 Relevant business license, etc.	6 分 6 points
		1.2 相关收益人 1.2 Relevant beneficiary	2 分 2 points
		1.3 收益人身份文件 1.3 Identity documents of the beneficiary	2 分 2 points
		1.4 相关商业关系 1.4 Relevant business relations	2 分 2 points
		1.5 财务状况 1.5 Financial conditions	2 分 2 points
		1.6 黄金/白银源产地资料信息等 1.6 Gold/silver origin data, etc.	6 分 6 points
2	矿场方 Minefields	2.1 证明合理和善意之努力识别黄金、白银的产地来源 2.1 Proof showing the rationality of goodwill of efforts to identify the origin of gold or silver	6 分 6 points
		2.2 采矿许可证 2.2 Mining permit	3 分 3 points
		2.3 进/出口黄金、白银许可证 2.3 Gold/silver import/export license	5 分 5 points
		2.4 采矿情况信息 2.4 Mining information	2 分 2 points
		2.5 开采能力的信息 2.5 Data related to mining capacity	2 分 2 points
3	回收金 Gold recovery (含自然人) (Including natural persons)	3.1 再生金银供应商资质信息 3.1 Qualification information of renewable gold and silver suppliers	6 分 6 points
		3.2 再生金银供应商商业关系 3.2 Business relations of renewable gold and silver suppliers	2 分 2 points
		3.3 再生金银供应商黄金/白银来源证明	4 分

		3.3 Proof of origin of gold/silver by renewable gold and silver suppliers	4 points
		3.4 再生金银供应商相关收益人背景情况描述等 3.4 Description of the relevant beneficiary's background information of renewable gold and silver suppliers	4 分 4 points
		3.5 再生金银供应商相关收益人身份文件 3.5 Relevant beneficiary's identity documents of renewable gold and silver suppliers	4 分 4 points

附件二：风险分级

Annex II: Risk Ranking

序号 S/N	风险等级 Risk level	风险值 (R) Risk value (R)	控制要求 Control requirements
1	(i)低风险 (i) Low risk	$R \geq 6$ 分 $R \geq 6$ points	继续交易减少风险 Continue transactions to reduce risks
2	(ii)中风险 (ii) Medium risk	$2 \text{ 分} < R < 6 \text{ 分}$ $2 \text{ points} < R < 6 \text{ points}$	暂停交易减少风险 Suspend transactions to reduce risks
3	(iii)高风险 (iii) High risk	$R \leq 2$ 分 $R \leq 2$ points	停止交易摆脱风险 Cease transactions to reduce risks

附件三：

Annex III:

供应商社会责任承诺书

Suppliers' Social Responsibility Commitment Letter

供应商名称：_____ 责任人：_____

Supplier's name: _____ Responsible person: _____

地址：_____电话：_____

Address: _____ Tel.: _____

深圳市粤鑫贵金属有限公司：

Shenzhen Yuexin Precious Metals Co., Ltd.:

我公司已经收到贵公司发送的符合LBMA RGG和RSG尽责管理体系的采购政策，为保障本项政策的顺利推行，我公司愿意遵守本管理体系的各项要求，在日常经营合作中配合贵公司执行本项工作。

我谨代表本公司向贵司承诺：

We have acknowledged the procurement policy meeting the LBMA RGG and RSG responsible management system requirements sent by your company. To ensure the smooth implementation of the policy, we are willing to observe all requirements under the management system and cooperate with your company in daily operation. In the name of the Company, I _____ make the following commitments:

本公司愿意主动承担社会责任，积极回馈社会，倾力于保证企业员工的健康和安全，为贵公司提供的所有类别黄金、白银产品的收购均为合法所得，不涉及以下情况：

The Company is willing to actively assume social responsibilities, make contributions to society and be dedicated to ensuring the health and safety of the employees of the enterprise. All types of gold and silver products

provided for your company are acquired legally and do not involve the following circumstances:

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.

说明：

Note:

1、本承诺书向全体员工及利益相关者公开，自发布之日起实施。

1. The Commitment Letter is public to all employees and stakeholders and is implemented upon the date of issuance.

2、我公司接受贵公司进行不预先通知的检查，包括对生产场所、办公地点、账簿、文件、雇佣事项及记录，以确保本承诺得到有效贯彻。

2. We accept your inspections without prior notice, including the production premise, office areas, account books, documents, recruitment matters and records to ensure the effective implementation of the commitment.

总经理：

General Manager:

公司印章：

Seal of the Company:

时间:

Time: