**深圳市粤鑫贵金属精炼有限公司**

**Shenzhen Yuexin Precious Metals Co., Ltd.**

**2023年度**

**供应链尽职管理合规报告**

**Supply Chain Due Diligence Management Compliance Report for Year 2023**

**2024年3月10日**

**March 10, 2024**

**公司名称：深圳市粤鑫贵金属精炼有限公司**

**Company name: Shenzhen Yuexin Precious Metals Co., Ltd.**

**位 置：深圳市龙岗区坪地街道六联社区红岭工业园9号D栋101**

**Location: 101, Building D, No.9, Hongling Industrial Zone, Liulian Community, Pingdi Sub-district, Longgang District, Shenzhen City**

**年终报告：2023年度LBMA供应链尽职管理合规报告**

**Year-end report: 2023 LBMA Supply Chain Due Diligence Compliance Report**

**报告日期：2024年3月10日**

**March 10, 2024**

**报告负责人：王镇城**

**Person in charge of report: Wang Zhencheng**

**报告人职务：合规风控总监 150018161@qq.com**

**Position of the person in charge of report: Compliance Risk Control Director 150018161@qq.com**

1. **公司概况**

**I. Company profile**

深圳市粤鑫贵金属有限公司，成立于2011年10月，公司位于深圳市龙岗区坪地六联石碧村红岭工业区九号D栋，并在深圳水贝珠宝街设有展厅，是一家集金银铂钯等贵金属收购、精炼、加工、检测、销售、交易及回购等于一体的专业现代化贵金属深加工企业。公司于2016年11月成为上海黄金交易所综合类会员，是上海黄金交易所可提供标准金锭企业。精炼厂区面积5000平方米，拥有提纯黄金200吨/年、铂金20吨/年、钯金20吨/年、白银200吨/年等多条贵金属精炼生产线，主要生产高品质的黄金、白银、铂金及钯金等产品。公司经过多年的专注经营和自主技术创新研发，黄金产品纯度已能达到99.9999，成为业内的排头兵。

Founded in October 2011 and located in Building D, No.9, Hongling Industrial Zone, Liulian Community, Pingdi Sub-district, Longgang District, Shenzhen City, Shenzhen Yuexin Precious Metals Co., Ltd. is equipped with an exhibition hall in Shuibei Jewelry Street, Shenzhen, and is a professional modern precious metal deep-processing enterprise integrating the acquisition, refining, processing, testing, sales, trading and repurchase of precious metals such as gold, silver, platinum and palladium. The Company became a comprehensive member of the Shanghai Gold Exchange in November 2016, and is an enterprise capable of providing standard gold ingots approved by the Shanghai Gold Exchange. The refinery covers an area of 5000 square meters. It has a number of precious metal refining production lines, including production capacity of purified gold of 200 t/a, platinum of 20 t/a, palladium of 20 t/a, and silver of 200 t/a. It mainly produces high-quality gold, silver, platinum, palladium and other products. Through years of dedicated operation and independent technological innovation and research of the Company, the purity of gold products has reached 99.9999, becoming the leader in the industry.

公司坚持以技术创新为核心经营理念，引进及研发自动化生产装备助力业务高速发展，建立品牌信誉，以上金所规定的原料标准为产品标准，以全新自动化生产线高效率地加工高质量的产品。公司于2017年7月分别通过了ISO9001：2015质量体系认证，ISO14001:2015环境管理体系认证和ISO45001:2018职业健康安全管理体系认证。

Adhering to the core business philosophy of technological innovation, the Company has introduced and researched and developed automated production equipment to assist the rapid development of industry business, establishing a brand reputation with the raw material standard specified by Shanghai Gold Exchange as the product standard and efficiently processing high-quality products with a new automated production line. In July 2017, the Company passed the ISO9001:2015 quality system certification, ISO14001:2015 environmental management system certification and ISO45001:2018 occupational health and safety management system certification.

十余年来，粤鑫公司本着“以诚为本，信誉优先”的理念，坚持诚信经营，以稳定可靠的产品质量和高于国家标准的品质要求，在黄金行业特别是深圳黄金产业圈得到了广泛认可，“粤鑫金”牌金锭业务几乎是“家喻户晓”，粤鑫公司还是广东省黄金协会副会长单位、中国黄金协会理事单位、中国黄金行业统计样本单位以及中国足金首饰回收五大重点精炼企业。

For more than a decade, The Company under the concepts of “honesty first, reputation first” and integrity management has been widely recognized in the gold industry, especially in the Shenzhen gold industry circle, by account of stable and reliable product quality and quality requirements higher than national standards. The gold ingot business of “Yuexin Gold” brand is almost a “household name”. Yuexin Company is also the Vice-President Unit of Gold Association of Guangdong Province, the Director Unit of China Gold Association, the Statistical Sample Unit of China’s Gold Industry and one of the five key refining enterprises of China’s gold jewelry recycling.

展望未来，粤鑫公司将充分发挥自身贵金属精炼发展方面具有独特的优势，打造全新的精炼产业链，依法合规开展各项经营业务，为深圳地区乃至全国贵金属产业发展贡献应有的力量。

The company will give full play to its unique advantages in the development of precious metal refining and contribute its due strength to the development of the precious metal industry in Shenzhen and even the whole country in the future by creating a new refining industry chain and carrying out various business operations in accordance with laws and regulations.

**二、供应商情况概述**

**II. Overview of suppliers**

公司金银原料主要来源是从社会中回收的以旧首饰为主的合质金银。

The Company’s gold and silver raw materials mainly come from crude gold and silver mainly from old jewelry recycled from society.

**三、合规情况概述**

**III. Overview of compliance**

公司对所有供应商进行尽职的供应链调查，要求所有供应商提供的原料来源合法、合规。

The Company conducts a due diligence supply chain investigation on all suppliers and requires that the sources of raw materials provided by all suppliers are legal and compliant.

第一步 建立强大的公司管理体系

Step 1 Establish strong company management systems

合规声明与要求：

Compliance Statement with Requirement:

我公司已经充分遵守第1步骤：建立强大的公司管理体系。

We have fully complied with Step 1: Establish strong company management systems.

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地。

The Company has strictly complied with the requirements of Step 1 of the LBMA Responsible Gold and Silver Guidance “establish strong company management systems” and has established strong management systems to ensure that the supply chain due diligence work is fully implemented.

1.政策方面

1. Policy

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，该政策在企业内外部公布于官网链接：

The Company approved and issued a supply chain due diligence policy, which complies with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and is extended to environmental and sustainability responsibilities. This policy is published on the official website link inside and outside the Company:

**http://www.yuexin9999.com/index.php-id=news&cate=ggl.htm**

政策要求公司及其供应商严格遵守国家关于职工权利、环境保护、公平交易等各项法律法规，积极参与供应链尽职调查工作，确保矿产金银、再生金银来源符合LBMA尽职调查管理要求，并作出承诺，拒绝来自侵犯人权、冲突地区、贿赂、洗钱、恐怖主义融资、非法开采、世界遗产遗址、采用汞开采等高风险地区的黄金、白银。

It is required by this policy that the Company and its suppliers strictly abide by the national laws and regulations on employee rights, environmental protection, fair trade, etc. and actively participate in the supply chain due diligence to ensure that the sources of gold and silver in minerals and renewable gold and silver meet the LBMA due diligence management requirements and make commitments to refuse gold and silver from high-risk areas involving human rights violations, conflict areas, bribery, money laundering, terrorist financing, illegal mining, world heritage sites and mercury mining.

2.管理架构

2. Management structure

公司已经建立了内部管理制度，按照出台的政策对管理、作用和职责、内部沟通进行界定并开展尽职调查体系的管理评审。

The Company has established an internal management system to define management, roles and responsibilities, internal communication according to the issued policy and carry out management review of the due diligence system.

公司已于2023年10月31日进行了管理评审，并将管理评审结果汇报给了合规总监。

The Company carried out a management review on October 31, 2023 and reported the management review results to the Compliance Director.

2.1规章制度方面

2.1 Rules and regulations

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》，主要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。上述制度通过合规风控总监、董事长、董事会审批后以红头文件的形式下发，作为文控处理。

According to the LBMA Responsible Gold (Silver) Guidance, the Company has formulated the Supply Chain Due Diligence Management Measures and the Supply Chain Due Diligence Management Policies, which mainly define the organizational structure, responsibilities and definition of high-risk areas of supply chain due diligence, and formulate high-risk supply chain assessment standards, investigation and processing procedures, transaction monitoring, document saving, etc. After being approved by the Compliance Risk Control Director, the Chairman and the Board of Directors, the above systems are issued in the form of formal documents as document control.

2.2职责与权限

2.2 Responsibilities and authorities

公司设置合规风控总监、合规风控专员、合规专员。

The Company sets up the Compliance Risk Control Director, Compliance Risk Control Officers and Compliance Officers.

合规风控总监由公司副总经理负责公司供应链尽职调查工作，建立健全供应链尽职调查管理体系，监督供应链尽职调查流程，协调处理供应链尽职调查中的异常情况，审批合规报告。

The Deputy General Manager of the Company takes the post of the Compliance Risk Control Director to be responsible for the Company’s supply chain due diligence, the establishment and improvement of the supply chain due diligence management system, the supervision of the supply chain due diligence process, the coordination of the handling of exceptions in the supply chain due diligence and the approval of the compliance report.

合规风控专员指定营运板块的财务部负责人担任，负责有关供应链尽职调查管理的所有事项。负责制定并更新供应链尽职调查政策、制度，负责制定高风险供应链评判标准和执行供应链尽职调查措施，指导、协调、报告公司风险评估、应对和实施等情况，监督、检查各部门的落实情况并考核，汇报供应链尽职调查中的异常情况。同时，对供应链尽职调查进行审核，并评估尽职调查是否充分，必要时收集额外文件或信息。负责有关责任供应链的员工培训，编制并更新供应链政策，并向高级管理人员提供用于履行职责的适当信息。

The person in charge of the Financial Department of the operation sector is appointed as the Compliance Risk Control Officer to be responsible for all matters related to the supply chain due diligence management, including the formulation and update of supply chain due diligence policies and systems, the formulation of high-risk supply chain evaluation criteria, the implementation of supply chain due diligence measures, the guidance, coordination and reporting of the Company's risk assessment, response and implementation, the supervision and check of the implementation of all departments and the assessment, as well as the reporting of the exceptions in supply chain due diligence. At the same time, the Compliance Risk Control Officer should be responsible for the review of the supply chain due diligence, the assessment of whether the due diligence is sufficient, and collection of additional documents or information if necessary. Besides, the Compliance Risk Control Officer should be responsible for employee training on the responsible supply chain, preparation and updating of supply chain policies, and supply of appropriate information to senior management to perform their duties.

合规专员由业务部、物流部、财务部、工厂指派，负责严格执行供应链尽职调查措施和高风险供应链评判标准，收集并保存足够的供应链证明文件，建立供应商尽职调查档案，并定期对重要供应商进行现场调查。

The Compliance Officer is appointed by the Business Department, the Logistics Department, the Finance Department and the Factory to be responsible for the strict implementation of the supply chain due diligence measures and high-risk supply chain evaluation criteria, the collection and saving of sufficient supply chain supporting documents, the establishment of supplier due diligence files and the implementation of regular on-site investigations on important suppliers.

公司制定了对合规风控专员、合规专员的问责机制，通过监督与检查，确保供应链尽职调查工作得到有效的实施，规避高风险供应链的交易。要求相关专员定期向高级管理人员汇报供应链尽职调查情况，并及时召开内部会议。

The Company has established an accountability mechanism for the Compliance Risk Control Officers and Compliance Officers to ensure effective implementation of supply chain due diligence and avoid high-risk supply chain transactions through supervision and inspection. Relevant officers are required to regularly report the situations of supply chain due diligence to senior management and hold internal meetings promptly.

3.强有力的内部追溯体系

3. Strong internal traceability system

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。

The Company has established a set of supply chain traceability systems to collect and maintain the supply chain information of each batch of products and assign a unique number to each batch of outbound products.

3.1供应链可追溯体系

3.1 Supply chain traceability system

所有的供应商都会被进行资信调查，通过尽职调查问卷收集和审查供应商资质、业务运营、股东信息和物料来源等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；熔炼取样化验，最后形成标准金银锭，分配唯一编号，通过上海黄金交易所进行交易。

All suppliers will be subject to credit investigation. The due diligence questionnaire will be used to collect and review suppliers’ qualifications, business operations, shareholder information, material sources, etc. After the credit investigation is passed, the contract will be signed and the raw materials should be legal and comply with the LBMA due diligence policy. Each batch of incoming materials sent by suppliers should be provided with warehouse entries indicating the product type, weight, and signature of the inspector and the supplier for confirmation. Smelting, sampling and laboratory testing should be performed to finally form standard gold and silver ingots with unique numbers assigned and traded through the Shanghai Gold Exchange.

公司对所有交易情况进行监督，确保交易与供应链调查一致。

The Company monitors all transactions to ensure that the transactions are consistent with the supply chain investigation.

公司对供应链尽职调查进行检查，公司使用在线黄金管理系统记录黄金来料，使用Excel手工记录白银来料。所有黄金来料编号唯一，生产可追溯，但是对于白银来料，公司给每批白银来料分配唯一编号，确保物料可追溯，对于所有的原料入库均保留完整的单据资料，对于入库的金/银料保存有入库单、检验单、财务凭证等。明确各个部门应在日常工作中收集保存的资料，由业务部、检测中心、财务部对相关单据进行保存，并定期将相关资料送至档案室进行存档，保存期限均高于5年。

The Company checks the supply chain due diligence. The Company uses an online gold management system to record the incoming gold materials and use Excel to manually record the incoming silver materials. All incoming gold materials should have a unique number and their production shall be traceable. The Company assigns a unique number to each batch of incoming silver materials to ensure the traceability of materials. Each batch of incoming materials should have a unique number and the production should be traceable. For the warehousing of all raw materials, the Company should keep complete documents and data. For gold/silver materials into the warehouse, the Company should keep warehousing entries, inspection sheets, financial vouchers, etc. The Company should specify the data that should be collected and saved by all departments in daily work. The Business Department, the Testing Center and the Finance Department should keep the relevant documents and regularly send the relevant data to the archives for filing. The retention period is more than 5 years.

3.2维护资料

3.2 Maintenance data

在业务开展中，客户的身份证、身份验证资料、营业执照、资质验证资料、供应商尽职调查表、每一批次的入库单、出库单、检测单等相关记录保存5年以上。

During the business development, the clients’ ID cards, identity verification data, business licenses, qualification verification data, due diligence questionnaires of suppliers, warehousing entries, ex-warehouse entries, inspection lists and other relevant records of each batch should be kept for more than 5 years.

3.3培训

3.3 Training

公司每年将供应链尽职调查管理培训纳入公司年度培训计划当中，组织公司重点岗位以及合规专员对供应链尽职调查管理的要求、内容以及LBMA负责任的黄金、白银指南进行培训，确保供应链尽职调查管理工作落到实处。2023年6月14日与12月11日组织了两次对公司各相关部门人员与工厂管理人员、生产人员的LBMA负责任供应链相关知识培训。

The Company incorporates the training on supply chain due diligence management into the Company’s annual training plan every year and organizes the Company’s key posts and Compliance Officers to accept training on the requirements and contents of supply chain due diligence management, as well as the LBMA Responsible Gold and Silver Guidance to ensure that the supply chain due diligence management is implemented. On June 14th and December 11th, 2023, the Company organized two pieces of training on LBMA responsible supply chain-related knowledge for personnel of relevant departments of the Company and management personnel and production personnel of the Factory.

3.4通过官方银行渠道付款

3.4 Payment through official bank channels

公司在支付货款时，由市场部门发起资金事项联签程序，通过公司基本户所在的银行网上付款，并打印银行回单作为凭证附件保留以配合政府部门的监管。

When the Company pays for goods, the Market Department should launch the joint signing procedure for capital matters and make online payments through the bank where the Company’s basic account is located. In addition, the bank receipt should be printed as an attachment to the voucher for retention and coordination with the supervision of the government department.

1. 强化合作，协助黄金、白银供应链交易方建立尽职调查能力

4. Strengthening of cooperation and assistance in gold and silver supply chain traders to establish due diligence capabilities

2023年，公司被深圳市生态局开展的清洁生产审核合格通过，同时被评为国际先进企业，获得清洁生产优秀企业称号，同年三级标准化审核合格。

In 2023, The Company passed the cleaner production audit carried out by the Shenzhen Municipal Ecological Bureau and was rated as an internationally advanced enterprise. The Company was awarded the title of excellent cleaner production enterprise. In the same year, the Company passed the three-level standardization audit.

公司鼓励与供应商建立基于信任和互认的长期关系，特别是遵守经合组织《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EGS和可持续性责任的供应商。

The Company encourages the establishment of long-term relationships with suppliers based on trust and mutual recognition, especially complying with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and extending to suppliers with EGS and sustainability responsibilities.

公司将黄金、白银供应链的政策与要求通过电子邮件等方式传达给相关交易方，提高供应链交易方建立尽职调查能力，支持EITI原则。公司与供应商都要严格遵守合同和法律的规定。

The Company communicates the policies and requirements of the gold and silver supply chain to relevant traders through e-mail, improving the ability of supply chain traders to establish due diligence, and supporting EITI principles. Both the Company and the suppliers should strictly abide by the provisions of the contract and laws.

公司所有供应商都签署《供应商社会责任承诺书》，承诺黄金、白银来源合法、合规，符合LBMA规定。对于公司销售的大客户要备案其下游客户的发票，规避偷逃税款风险。

All suppliers of the Company have signed the Letter of Commitment for Social Responsibility of Supplier, promising that the gold and silver sources are legal and compliant and conform to LBMA regulations. For key clients of the Company, the invoices of their downstream clients should be filed to avoid the risk of tax evasion.

5.建立机密申诉机制

5. Establishment of a confidential appeal mechanism

公司利用官方网站链接：

http://www.yuexin9999.com/index.php-id=news&cate=ggl.htm，公布电话和邮箱，允许员工和外部利益相关者表达关于负责任供应链与贸易、加工和出口情况有关的疑虑对供应链或任何新的识别风险的担忧。公司建立了完善的申诉处理程序，并在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。

The company uses the official website link:

http://www.yuexin9999.com/index.php-id=news&cate=ggl.htm is used for publishing the telephone and email address. The Company allows employees and external stakeholders to express their doubts about the responsible supply chain related to mining, trade, processing and export, and their concerns about the supply chain or any newly identified risks. The Company has established a sound appeal handling procedure to protect the privacy of employees throughout the appeal process and keep the informant’s information confidential to further prevent any retaliation.

2023年公司未接到员工和外部利益相关者的申诉。

In 2023, the Company did not receive appeals from employees and external stakeholders.

第二步 供应链风险的识别与评估

Step 2 Identify and assess risk in the supply chain

**合规声明与要求：**

**Compliance Statement with Requirement:**

**我公司已经充分遵守第2步骤：对供应链中的风险进行识别和评估。**

**We have fully complied with Step 2: Identify and assess risk in the supply chain.**

公司严格遵守LBMA黄金、白银责任指南第二步“供应链风险的识别与评估”的要求，制定了受冲突影响和高风险区域的识别程序（包括标准、引用资源和流程），制定了高风险供应链的判定标准和对识别出来的风险的处理程序，充分对供应链中的风险进行识别、评估和缓解。2023年度，公司来料均为来自国内再生金/银，根据公司受冲突影响和高风险区域的识别程序判定中国为低风险区域，未发现高风险供应链。

The Company has strictly complied with the requirements of Step 2 of the LBMA Responsible Gold and Silver Guidance “identify and assess risk in the supply chain” and has developed the identification procedures (including standards, reference resources and processes) for conflict-affected and high-risk areas and the criteria for determining high-risk supply chains and the procedures for handling identified risks to achieve full identification, assessment and mitigation of the risks in the supply chain. In 2023, the Company’s incoming materials are all from domestic renewable gold/silver. According to the Company’s identification procedures for conflict-affected and high-risk areas, China is determined as a low-risk area and no high-risk supply chain is found.

1.识别供应链风险

1. Identify the risk in the supply chain

根据经合组织《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，黄金与白银冶炼公司识别相关风险，密切关注来自侵犯人权、武装冲突、非法开采、开采利用汞以及源于世界遗产遗址等地区的黄金、白银，以及用于贿赂、洗钱、恐怖主义融资等行为的黄金、白银。公司为每个供应商建立供应商档案，根据公司的风险状况进行了调查，在与其签合同之前完成供应商档案的建立工作。

According to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its extension to environmental and sustainability responsibilities, gold and silver smelting companies identify relevant risks and pay close attention to gold and silver from areas involving human rights violations, armed conflicts, illegal mining, utilization of mercury during mining and world heritage sites, as well as gold and silver used for bribery, money laundering, terrorist financing, etc. The Company has established supplier archives for all suppliers and conducted an investigation according to the Company’s risk status. In addition, the Company has completed the creation of supplier archives before signing contracts with suppliers.

2.评估供应链风险

2. Assess the risk in the supply chain

2.1供应链调查

2.1 Supply chain investigation

公司通过以下措施对供应链进行尽职调查，并完成了尽职调查问卷：

The Company conducted due diligence on the supply chain through the following measures and completed the due diligence questionnaire matter:

（1）资质验证。对于所有供应商均进行供应链的尽职管理调查，在进行合作前要求合作方提供相应的资质证明文件，法人客户提供营业执照，个人客户提供身份证复印件。

(1) Qualification verification. Supply chain due diligence management investigation should be carried out for all suppliers. Before cooperation, the partners should be required to provide corresponding qualification certificates and the corporate clients should be required to provide business licenses. In addition, individual clients should be required to provide copies of ID cards.

（2）建立供应商档案。对供应商基本情况、股东信息、实际控股人、供应商管理层架构、提供原料类型及产地、计划精炼贵金属类型、与其供应商结算方式、 其供应商概况等信息进行详细调查，并尽可能的将供应链调查向供应商的上游延伸，最终确定其风险等级，对于涉及高风险标准的供应商终止合作。

(2) Create supplier archives. A detailed investigation should be made on the basic information of suppliers, shareholder information, actual shareholder, supplier management structure, type and origin of raw materials provided, type of precious metals planned to be refined, settlement method with suppliers, overview of suppliers and other information. Besides, the supply chain investigation should be extended to the upstream suppliers as far as possible to determine their risk level. The cooperation with suppliers involving high-risk standards should be terminated.

（3）建立来料登记簿。对供应商当批次来料的日期、重量、原料来源、主要上游供应商进行尽职调查，判断其来料风险等级。

(3) Establish an incoming material register. The due diligence should be conducted on the date, weight, raw material source and main upstream suppliers of the suppliers’ incoming materials in the current batch to determine the risk level of their incoming materials.

（4）建立客户专项调研报告工作流程。在走访客户时，对原料来源进行追溯，向供应商传达黄金与白银冶炼公司尽职管理政策，并要求其在政策上签字。

(4) Establish the working process of special investigation reports for clients. At the time of visiting clients, the source of raw materials should be traced. The due diligence management policy of gold and silver smelting companies should be conveyed to suppliers and the suppliers should be required to sign the policy.

2.2 CAHRA的判定。公司制定了CHARA的识别流程。公司采用以下资源判断CAHRA。

2.2 Judgment of CAHRA. The Company has developed the CHARA identification process. The Company will use the following resources to judge CAHRA.

• 制裁名单(欧盟、联合国综合制裁名单)

• Sanctions list (consolidated EU and UN sanctions list)

• 多德-弗兰克法案第 1502 条十个指明国家

• Ten specified countries in Article 1502 of the Dodd-Frank Act

• 海德堡冲突晴雨表

• Heidelberg conflict barometer

• 脆弱国家指数

• Fragile States Index

• 联合国人权报告

• UN human rights report

•欧盟CAHRA名单

• EU CAHRA List

•金融行动特别工作组 (FATF) 的报告(包括相关国家/地区报告）

• Reports of the Financial Action Task Force (FATF) (including reports of relevant country/area)

•关于高风险黄金中心/转运中心和高洗钱风险国家/地区的可靠市场情报

• Reliable market intelligence on high-risk gold centers/ transshipment centers and countries/areas with high money-laundering risks

2.3高风险供应链

2.3 High-risk supply chain

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：

According to the relevant provisions of LBMA and OECD and in combination with the actual situation of the Company, the following high-risk supply chain evaluation criteria are specified:

（1）矿产金银或再生金银来源于、中转或者运经受冲突影响和高风险地区；

(1) The mined gold and silver or recycled gold and silver come from, and are transited to or transported to conflict-affected and high-risk areas;

（2）矿产金银声称来源于一个已知储量有限、资源有限或预计产量有限的国家；

(2) The mined gold and silver are claimed to come from a country with limited known reserves, resources or expected production;

（3）再生金银来源于已知的冲突影响和高风险地区，或者有理由怀疑经此地区中转的；

(3) The recycled gold and silver come from the known conflict-affected and high-risk areas, or are suspected of being transited through this area with reasons;

（4）在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) The companies in the supply chain or other known upstream companies are located in a country with high risks of money laundering, crime and corruption;

（5）在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 beneficial owners of companies in the supply chain or other known upstream companies are politically sensitive persons;

（6）在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、钻石等），宗教和宗教领袖的；

(6) The companies in the supply chain or other known upstream companies actively participate in high-risk business activities (such as weapons, gambling, gaming, antiques and artworks, diamonds, etc.) and activities involving the religion and religious leaders;

（7）矿产金银来源于国内手续不全、非法开采的小型矿山，以及开采黄金、白银源于手工开采；

(7) The mined gold and silver come from small mines with incomplete domestic procedures and illegal mining and the mined gold and silver come from manual mining;

（8）矿产金银或再生金银利用汞生产而得；

(8) The mined gold and silver or recycled gold and silver are produced by using mercury;

（9）不遵守环境和可持续发展法律要求，矿产金银或再生金银源于世界遗产遗址或国内自然生态保护区；

(9) The mined gold and silver or recycled gold and silver come from world heritage sites or domestic natural ecological protection areas in violation of environmental and sustainable development laws;

（10）其他高风险情况。

(10) Other high-risk situations.

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风控专员，由合规风控专员上报合规总监，由合规总监批准采取应对措施，停止交易，消除风险。

When any of the above evaluation criteria exist objectively, the supply chain is judged as a high-risk supply chain. The Compliance Officer of the Department should immediately prepare materials and report them to the Compliance Risk Control Officer, who should then report them to the Compliance Director. Then, the Compliance Director should approve the adoption of countermeasures to stop the transaction and eliminate risks.

2.4公司建立风险评估流程，对公司黄金、白银供应商风险进行评估：

2.4 A risk assessment process established by the Company to assess the risks of its gold and silver suppliers:

由财务部、人力资源部负责对风险事件造成的损失进行量化评估，对相关责任人追究其责任，对风险事件跟踪调查，消除危险源，减少损失。

The Finance Department and the Human Resources Department are responsible for the quantitative assessment of the losses caused by risk events, the accountability of relevant persons in charge, the follow-up investigation of risk events, the elimination of hazard sources and the reduction of losses.

公司通过对上游原料供应商的尽职调查，向供应商宣传“OECD关于在受冲突影响和高危地区合格供应链的尽职调查指南”，提醒和督促上游原料供应商合法、合规经营，不向原料需求商出售以下高风险原料：

Through due diligence on upstream raw material suppliers, the Company publicized the “OECD Due Diligence Guidance for Qualified Supply Chains from Conflict-Affected and High-Risk Areas” to suppliers, reminded and urged upstream raw material suppliers to operate legally and in compliance and did not sell the following high-risk raw materials to raw material clients:

（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 and widespread human rights violations related to gold/silver mining, transportation and trading, forced labor, child labor, cruelty and inhuman and humiliating abuse;

（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 law, human rights crimes or genocide;

（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). Direct or indirect support to non-governmental armed groups, public or private security forces, procurement of precious metals or supply of assistance (Refer to the definitions in the Gold and Silver Appendix of the OECD Due Diligence Guidance for 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). Bribery or concealment of the true source of gold and silver;

（5）、存在洗钱或自高风险、冲突地区采购贵金属；

(5). Existence of money laundering or procurement of precious metals from high-risk and conflict areas;

（6）、存在恐怖主义融资；

(6). Existence of terrorist financing;

（7）、存在加剧冲突；

(7). Existence of aggravation of conflicts;

（8）、可能开采黄金利用汞生产而得；

(8). Gold that may be mined and produced by using mercury;

（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). Possible non-compliance with the legal requirements of the environment and sustainable development, and the gold mined coming from the world heritage sites or domestic ecological nature 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, and desertification caused by the development of mineral resources as well as the existence of land subsidence, collapse, mountain collapse, landslide, debris flow and other geological disasters;

（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害。

(11). Existence of pollution of water, soil and air caused by waste residue, waste water and exhaust emission, damage to wildlife resources and natural geological and geomorphic landscape and endangerment to citizens’ health and property damage.

3.向高级管理层报告风险评估

3. Report risk assessment to senior management

公司建立风险评估报告制度，当供应链调查发现来自高风险区域，被评估为高风险供应链时，停止该交易并上报合规总监。2023年度评估所有黄金、白银供应商均为低风险。

The Company has established a risk assessment reporting system. When the supply chain investigation finds that the supply chain is from a high-risk area and is assessed as a high-risk supply chain. Then, the transaction will be stopped and reported to the Compliance Director. All gold and silver suppliers were assessed as low risk in 2023.

第三步 设计并实施策略来应对已识别的风险

Step 3 Design and implement strategies to respond to identified risks

**合规声明与要求：**

**Compliance Statement with Requirement:**

**我公司已经充分遵守第3步：设计和落实管理体系应对识别的所有风险。**

**We have fully complied with Step 3: Design and implement management systems to respond to all identified risks.**

# 公司严格遵守LBMA黄金、白银责任指南第三步“设计并实施策略来应对已识别的风险”的要求。2023年未发现高风险供应链，不需要做风险缓解。

The Company has strictly complied with the requirements of Step 3 of the LBMA Responsible Gold and Silver Guidance “design and implement strategies to respond to identified risks”. No high-risk supply chain was found in 2023, so no risk mitigation was required.

公司制订了《供应链风险减缓管理办法》制定了风险缓解策略，包括（i）在继续交易的同时减轻风险；（ii）在暂停交易的同时减轻风险；或（iii）终止交易，并作为文控管理，约定了在供应商评估及日常业务开展过程中发现的违规情况的处理方式；规范了发现供应商存在高风险行为的处理步骤；明确了尽职管理各级组织、人员的责任，向高级管理人员实施进度跟进。

The Company has formulated the Supply Chain Risk Mitigation Management Measures and risk mitigation strategies, including (i) risk mitigation at the time of continued trading; (ii) risk mitigation at the time of suspension of transactions; or (iii) termination of transactions and, as a document control management, agreeing on the handling methods for violations found in the supplier assessment and daily business development; standardizing the handling steps for finding high-risk behaviors of suppliers; clarifying the responsibilities of organizations and personnel at all levels of due diligence management, and following up the progress with senior management.

疑似高风险来料后，对其进行单独登记，并告知精炼车间，对其原料单独熔炼，在整个工艺流程中不与其他客户混合，对由其原料生产的成品金银进行单独编号，并在金库中与其他成品金银分区域存放。

If the incoming materials of the suppliers are suspected to be from high-risk areas, they should be registered separately. The Refining Workshop should be informed to smelt raw materials of such suppliers separately. Such raw materials should not be mixed with raw materials of other clients in the whole process flow. The finished gold and silver produced from such raw materials should be numbered separately and stored in the vault with other finished gold and silver in different areas.

当供应链调查发现来自高风险区域时，要做加强型尽职调查，包括实地评估，评估政策中的风险。当供应链尽职调查发现可能来自高风险区域，则需立即暂停该矿产金银、再生金银的冶炼，直至供应商在6个月之内提供可证明其并不可能存在的额外数据或信息为止。若在6个月之内仍未提供相关证据，则需立即停止该交易并上报至有关人员。

When the supply chain investigation finds that the mined gold and silver and recycled gold and silver come from a high-risk area, enhanced due diligence should be carried out, including on-site assessment to assess the risks in the policy. When the supply chain due diligence finds that the mined gold and silver and recycled gold and silver may come from high-risk areas, it is necessary to immediately suspend the smelting of such mined gold and silver and recycled gold and silver until the supplier provides additional data or information that can prove that it is impossible to exist within 6 months. If relevant evidence is not provided within 6 months, the transaction should be stopped immediately and reported to relevant personnel.

提供的资料包括：

The information provided includes:

（1）提供证明不存在有关矿产金银、再生金银提取、运输或贸易的系统性或广泛人权侵犯行为的政府性文件，如供应商所在地相关公安或商务部门出具的合法性证明等；

(1) Provide government documents proving that there are no systematic or extensive human rights violations related to the extraction, transportation or trade of mined gold and silver and recycled gold and silver, such as the legitimacy certificate issued by the relevant public security or commercial departments in the place where the suppliers are located on;

（2）提供并未向非法武装组织提供直接或间接支持的证明文件；

(2) Provide documents proving that they have not provided direct or indirect support to illegal armed groups;

（3）提供并未通过欺诈掩盖矿产金银或再生金银的原产地证明文件，如相关政府部门出具的原产地证明；

(3) Provide certificates of origin of mined gold and silver or recycled gold and silver proving that they have not covered up the origins by fraud, such as certificates of origin issued by relevant government departments;

（4）提供不存在洗钱或恐怖主义融资的证明文件；

(4) Provide documents proving that there is no money laundering or terrorist financing;

（5）提供国内小型矿山资质证明文件；

(5) Provide qualification certificates of domestic small mines;

（6）提供能够证明开采黄金、白银不是利用汞生产而得资料；

(6) Provide information that can prove that the mined gold and silver are not produced by using mercury;

（7）提供环境和可持续发展相关方针政策、制度文件以及通过有关部门环评报告；

(7) Provide guidelines, policies and institutional documents related to environment and sustainable development and pass the environmental impact assessment report of relevant departments;

第四步 对精炼商的尽职调查实践开展独立的第三方审计。

Step 4 Conduct an independent third-party audit of the refiner’s due diligence practice.

**合规声明与要求：**

**Compliance Statement with Requirement:**

**我公司已经充分遵守第4步：安排独立第三方审计。**

**We have fully complied with Step 4: Arrange for an independent third-party audit.**

公司严格遵守LBMA黄金、白银责任指南第四步“对精炼商的尽职调查实践开展独立的第三方审计”的要求，于2024年3月聘请RCS对公司2023年度供应链尽职体系进行审计。

The Company has strictly complied with the requirements of Step 4 of the LBMA Responsible Gold and Silver Guidance “conduct an independent third-party audit of the refiner’s due diligence practice” and have appointed RCS Global to audit the 2023 supply chain due diligence system of the Company in March 2024.

自2015年开始，公司每年均聘请独立的第三方审计机构（深圳市永铭会计师事务所）对财务进行审计，并出具审计报告。

Since 2015, the Company has engaged an independent third-party audit institution (Shenzhen Yongming Accounting Firm) to audit the finance and issue an audit report every year.

第五步 供应链尽职调查年度报告

Step 5 Annual report on supply chain due diligence

**合规声明与要求：**

**Compliance Statement with Requirement:**

**我公司已经充分遵守第5步：有关供应链尽职调查的报告。**

**We have fully complied with Step 5: Report on supply chain due diligence.**

公司严格遵守LBMA黄金、白银责任指南第五步“供应链尽职调查年度报告”的要求。

The Company has strictly complied with the requirements of Step 5 of the LBMA Responsible Gold and Silver Guidance “annual report on supply chain due diligence”.

公司每年通过对深圳市粤鑫贵金属精炼有限公司供应链尽职调查政策进行公示。

The Company publicizes the supply chain due diligence policy of Shenzhen Yuexin Precious Metals Co., Ltd. every year.

根据2023年的尽职调查结果，无供应商需要进行风险缓解的管理策略。在2023年度无黄金、白银评估结果为“暂停合作”或“终止合作”的供应商。供应链尽职管理合规报告将在公司官方网站进行公示。

According to the due diligence results in 2023, no supplier was required to implement a risk mitigation management strategy. In 2023, there were no suppliers whose gold and silver assessment results were “suspended cooperation” or “terminated cooperation”. The supply chain due diligence management compliance report will be published on the Company’s official website.

**关于强迫劳动的有限保证声明**

**Limited Warranty Statement on Forced Labor.**

合规声明：我们全部符合禁止使用强迫劳动的要求，本公司及所有供应商不存在强迫劳动。

Compliance Statement: We fully comply with the requirements prohibiting the use of forced labor, and our company and all suppliers do not engage in forced labor.

**合规陈述：**

**Compliance Statement:**

我们制定了《关于劳动者保护相关社会责任行为的要求和声明》和《劳工权益保护政策》，并用承诺书方式向供应商传达了禁止使用强迫劳动的要求,并采用电话访问、聊天软件沟通、或供应商（客户）现场参观访问等多种方式对公司所有黄金/白银供应商进行了关于强迫劳动的风险评估，形成了《关于强迫劳动的风险评估报告》。

We have established the "Requirements and Statements on Social Responsibility Behaviors Related to Worker Protection" and "Labor Rights Protection Policy” and communicated the prohibition of forced labor to suppliers through commitment letters. We conducted a risk assessment on forced labor for all gold/silver suppliers of the company through various methods such as telephone communication, communication software, or on-site visits with suppliers (customers), and formed a Risk Assessment Report on Forced Labor.

调查内容涵盖了《关于劳动者保护相关社会责任行为的要求和声明》和《劳工权益保护政策》中的强迫劳动情形，公司和合作商必须确保所有员工自愿被雇佣，不得雇用任何形式的奴隶（包括现代奴役劳动者）、强迫劳动者、抵债劳动者、被贩卖人口或监狱劳动者,不得限制人身自由，不得扣留身份证明文件，不得贩卖人口，包括不得通过威胁、强迫、强制、诱拐或欺骗方式运送、窝藏、招聘、转移或接收此类劳动者或服务。员工不得被要求向雇主或代理中介支付押金、招聘费或其他费用。

The survey covers the requirements and statements on social responsibility behaviors related to the protection of workers and the forced labor situation in the Labor Rights Protection Policy. Companies and partners must ensure that all employees are voluntarily employed, and shall not employ any form of slave (including modern slave laborers), forced laborers, bonded laborers, trafficked persons or prison laborers; shall not restrict personal freedom, detain identification documents, or traffic in human beings, including the transportation, harboring, recruitment, transfer or receipt of such laborers or services by threats, coercion, coercion, abduction or deception. Employees are not required to pay deposits, recruitment fees or other fees to the employer or the agency.

通过对供应商的尽职调查，我们的供应商分布地区在中国广东省、湖北省、湖南省、江西、云南省、黑龙江省、重庆市等地区，均属于低风险地区。2023年度，有金、银法人供应商57家，个人供应商30家，所提供的原料是旧金银首饰、贵金属边角料等。公司通过国家企业信用信息公示网站，企查查APP等公开网站查询，所有法人企业未有违反《中华人民共和国劳动法》和强迫劳动等信息。供应商的所有员工为自愿被雇佣，未发现供应商存在强迫劳动的风险。

Through due diligence on our suppliers, we have found that they are located in low-risk areas such as Guangdong Province, Hubei Province, Hunan Province, Jiangxi Province, Yunnan Province, Heilongjiang Province，Chongqing City in China. In 2023, there were 57 corporate suppliers of gold and silver, as well as 30 individual suppliers, providing raw materials such as old gold and silver jewelry and precious metal scraps. The company has searched through public websites such as the National Enterprise Credit Information Publicity Website and the Qichacha APP, and found that all legal entities have not violated the Labor Law of the People's Republic of China or engaged in forced labor. All employees of the supplier were voluntarily hired and no risk of forced labor was found in the supplier.

本公司建立了《人事管理制度》涵盖员工的招聘，录用，培训，奖励，惩罚，辞工，解除劳动合同，员工福利待遇， 和员工申诉，公司严格执行《中华人民共和国劳动法》，不存在任何强迫劳动现象。

Our company has established a Personnel Management System that covers the recruitment, employment, training, rewards, punishments, termination, termination of labor contracts, employee benefits and benefits, and employee complaints of employees. The company strictly implements the Labor Law of the People's Republic of China and does not engage in any forced labor.

**四、管理结论**

**IV. Management conclusion**

综上所述，在报告年度截至于2023年12月31日的财年内，根

据《伦敦金银市场协会（LBMA）负责任的黄金、白银指南》的要求，深圳市粤鑫贵金属精炼有限公司实施了有效的管理制度、程序、流程和实践。深圳市粤鑫贵金属有限公司致力于不断的改进提升，所有的纠正措施将在内部进行定期监测。

In conclusion, in the financial year ended December 31, 2023, Shenzhen Yuexin Precious Metals Co., Ltd. has implemented effective management systems, procedures, processes and practices in accordance with the LBMA Responsible Gold and Silver Guidance. Shenzhen Yuexin Precious Metals Co., Ltd. is committed to continuous improvement and all corrective measures will be regularly monitored internally.

**五、其他报告批注**

**V. Other report comments**

如果本报告用户希望就本报告向深圳市粤鑫贵金属有限公司进行任何反馈，则可以通过邮箱150018161@qq.com联系企业相关部门。

If users of this report wish to provide any feedback to Shenzhen Yuexin Precious Metals Co., Ltd. with respect to this report, contact relevant departments of Shenzhen Yuexin Precious Metals Co., Ltd. by E-mail 150018161@qq.com.