深圳市粤鑫贵金属有限公司

铂钯负责任采购供应链管理政策

Supply Chain Management Policy for Responsible Procurement of Platinum and Palladium of Shenzhen Yuexin Precious Metals Co., Ltd.

深圳市粤鑫贵金属有限公司作为伦敦铂金钯金市场协会（LPPM）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LPPM RPPG尽责管理体系。

Shenzhen Yuexin Precious Metals Co., Ltd. is a certificated application member of the London Platinum and Palladium Market (LPPM) and has implemented the LPPM RPPG responsible 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LPPM RPPG体系的顺利执行，各供应商应遵守LPPM RPPG管理体系的各项要求，并承诺向我公司提供的所有类别铂钯产品的收购均为合法，不涉及以下情况：

To cooperate with the smooth implementation of our LPPM RPPG system, all suppliers shall comply with the requirements of the LPPM RPPG management system and promise that the purchase of all kinds of platinum and palladium products provided for our company is legal and does not involve the following situations.

1. 与铂钯开采、运输和交易有关的系统化、广泛化的侵犯人权行为，这包括：

1. Systematic or widespread abuses of human rights related to platinum and palladium mining, transportation and trading, including:

* 1. 任何形式的酷刑、或不人道和有辱人格的待遇

a) Any form of torture or inhuman and degrading treatment

* 1. 强迫或强制性劳动

b) Forced or compulsory labor

* 1. 最恶劣形式的童工

c) The worst forms of child labor

* 1. 广泛的性暴力或其他严重侵犯人权的行为

d) Widespread sexual violence or other serious abuses of human rights

* 1. 战争罪，反人类罪或种族灭绝罪

e) War crimes, crimes against humanity or genocide;

1. 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铂钯附录中的定义）；

2. 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 Platinum and Palladium Appendix of the OECD Due Diligence Guidance for Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;

1. 贿赂而来或者是掩盖铂钯真实来源；

3. Bribery or concealment of the true source of platinum and palladium;

1. 存在洗钱或自高风险、冲突地区采购贵金属；

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

1. 存在恐怖主义融资；

5. Existence of terrorist financing;

1. 存在加剧冲突；

6. Existence of aggravation of conflicts;

1. 对环境的影响

7. Impact on the environment

* 1. 可能不遵守环境和可持续发展法律要求，开采铂钯源于世界遗产遗址或国内生态自然保护区；

a) Possible non-compliance with the legal requirements of the environment and sustainable development, and the platinum and palladium mined coming from the world heritage sites or domestic ecological nature reserves;

* 1. 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；

b) 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;

* 1. 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。

c) 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.

* 1. 对有毒有害化学物品的安全存储

d) Safe storage of toxic and harmful chemicals.

1. 对劳工的管理，包括工人的薪酬、工作时间、集体谈判、歧视，多样性、纠纷和工人权益保障；

8. Labor management, including workers’ remuneration, working hours, collective bargaining, discrimination, diversity, disputes and protection of workers’ rights and interests;

1. 社区参与和管理方案

9. Community participation and management plan

1. 管理商业诚信和道德行为，我公司支持并遵守采掘业透明度倡议（EITI）。

10. Management on business integrity and ethical behavior. our company supports and complies with the Extractive Industries Transparency Initiative (EITI).

 为了确保上述风险的充分识别，我公司承诺并确保：

In order to ensure the full identification of the above risks, our company promises and ensures that:

1、委任负责任供应链的合规风险总监以及合规风险专员负责铂金钯金的风险识别和管理。

1. The appointed Compliance Risk Director and Compliance Risk Officer of the responsible supply chain are responsible for the risk identification and management of platinum and palladium.

2、对铂金钯金的每一笔来源按照LPPM的要求进行充分的识别与记录，确保每一笔物料的可追溯性。

2. Each source of platinum and palladium shall be fully identified and recorded according to the requirements of LPPM to ensure the traceability of each material.

3、建立高风险地区和高风险供应链的识别流程，确保供应链中的上诉风险被充分的识别。

3. It is necessary to establish the identification process of high-risk areas and high-risk supply chain to ensure that the complaint risk in the supply chain is fully identified.

4、每年对负责铂金和钯金尽职调查管理体系的相关员工进行负责任采购采购的相关培训，并保留相应的培训记录。

4. The relevant staff responsible for the platinum and palladium due diligence management system shall be trained on responsible procurement every year with corresponding training records kept.

5、对铂金钯金的供应商进行充分的了解和调查，确保供应商及其最终受益人未被列入任何制裁清单。

5. It is necessary to fully understand and investigate the suppliers of platinum and palladium to ensure that the suppliers and their ultimate beneficiaries are not included in any sanctions list.

6、建立负责任采购申诉渠道（邮箱: 电话）并公布在公司网站（网址:），以确保任何潜在的风险和或暂未识别的风险被充分的识别。

6. A responsible procurement complaint channel shall be established (Email: /Tel: ) and posted on the Company’s website (website: ) to ensure that any potential risks and risks not identified are fully identified.

本管理政策自发布之日实施，并适用于我司及其铂钯原料的供应商。

The Management Policy shall be implemented as of the date of issuance and applicable to our company and suppliers of platinum and palladium raw materials.

深圳市粤鑫贵金属有限公司

Shenzhen Yuexin Precious Metals Co., Ltd.

 2023年1月6日

January 6, 2023

附件一：

Annex 1:

供应商社会责任承诺书

Letter of Commitment for Social Responsibility of Supplier

供应商名称： 责任人：

Name of supplier: 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LPPM RPPG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：

Our company has received the purchasing policy that conforms to LPPM RPPG responsible management system from your company. To ensure the smooth implementation of this policy, our company is willing to follow requirements of this management system and cooperate with your company to carry out this work in daily business cooperation. On behalf of our company, I promise to your company that:

1. 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铂钯产品的收购均为合法所得，不涉及以下情况：

11. Our company is willing to take the initiative to assume social responsibilities, actively repay the society, and make all efforts to ensure the health and safety of enterprise employees. The purchase of all kinds of platinum and palladium products provided for your company is legal and does not involve the following situations:

1. 与铂钯开采、运输和交易有关的系统化、广泛化的侵犯人权行为，这包括：

1. Systematic or widespread abuses of human rights related to platinum and palladium mining, transportation and trading, including:

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* 1. 强迫或强制性劳动

b) Forced or compulsory labor

* 1. 最恶劣形式的童工

c) The worst forms of child labor

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d) Widespread sexual violence or other serious abuses of human rights

* 1. 战争罪，反人类罪或种族灭绝罪

e) War crimes, crimes against humanity or genocide

1. 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铂钯附录中的定义）；

2. 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 Platinum and Palladium Appendix of the OECD Due Diligence Guidance for Supply Chains of Minerals from Conflict-Affected and High-Risk Areas);

1. 贿赂而来或者是掩盖铂钯真实来源；

3. Bribery or concealment of the true source of platinum and palladium;

1. 存在洗钱或自高风险、冲突地区采购贵金属；

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

1. 存在恐怖主义融资；

5. Existence of terrorist financing;

1. 存在加剧冲突；

6. Existence of aggravation of conflicts;

1. 对环境的影响

7. Impact on the environment

* 1. 可能不遵守环境和可持续发展法律要求，开采铂钯源于世界遗产遗址或国内生态自然保护区；

a) Possible non-compliance with the legal requirements of the environment and sustainable development, and the platinum and palladium mined coming from the world heritage sites or domestic ecological nature reserves;

* 1. 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；

b) 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;

* 1. 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。

c) 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.

* 1. 对有毒有害化学物品的安全存储

d) Safe storage of toxic and harmful chemicals.

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10. Management on business integrity and ethical behavior. our company supports and complies with the Extractive Industries Transparency Initiative (EITI).

说明：

Notes:

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. This Letter of Commitment is open to all employees and stakeholders, and shall be implemented as of 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. Our company accepts the unannounced inspection by your company, including the production site, office location, account books, documents, employment matters and records, thus ensuring the effective implementation of this commitment.

 总经理：

 General Manager:

 公司印章：

 Company seal:

 时间：

 Time: