**深圳市粤鑫贵金属有限公司**

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

**LPPM**

**2023年度**

**2023**

**供应链尽职管理合规报告**

**Supply Chain Due Diligence Management Compliance Report**

**2024年1月4日**

**January 4, 2024**

**公司名称：深圳市粤鑫贵金属有限公司**

**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d栋101**

**Location: Room 101, Building D, Hongling Industrial Park, Liulian Community, Pingdi Street, Longgang District, Shenzhen City**

**年终报告：2023年度LPPM供应链尽职管理合规报告**

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

**报告日期：2024年1月4日**

**Report date: January 4, 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**

**一、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。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。

Founded in October 2011 and located in Building D, No.9, Hongling Industrial Park, Shibi Village, Liulian Community, Pingdi Street, 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 recognized 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 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. Adhering to the core business philosophy of technological innovation, the Company has introduced and researched and developed automated production equipment to boost the rapid development of industry business, establishing a brand reputation with the raw material standard specified by the above 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, Yuexin 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 Organization of Gold Association of Guangdong Province, the Director Organization of China Gold Association, the Statistical Sample Organization of China’s Gold Industry and one of the five key refining enterprises of China’s solid 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。

Yuexin 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**

公司铂钯原料主要来源是从社会中回收的铂钯旧首饰料等。

The Company’s platinum and palladium raw materials mainly come from old platinum and palladium jewelry materials 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LPPM 铂钯责任指南第一步“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 LPPM Responsible Platinum and Palladium 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《铂钯负责任采购供应链尽职调查政策》，该政策包含了经济合作与发展组织发布的《关于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》中所列出的所有的风险并扩展至环境、社会责任和治理方面的风险，该政策在企业内外部公布于官网链接：<http://www.yuexin9999.com/index.php-id=1502.htm> ，并通过《供应商社会责任承诺书》的形式传达给了所有的铂金和铂金的交易方，所有交易方签订的承诺书也被存档保留。

The Company adopted and issued the *Due Diligence Policy for Responsible Platinum and Palladium Purchase Supply Chain*. The policy contains all the risks listed in the OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and extends to environmental, social responsibility and governance risks. Besides, the policy was published on official website <http://www.yuexin9999.com/index.php-id=1502.htm>, both inside and outside the enterprise, and was communicated to all platinum and platinum counterparties in the form of *Letter of Commitment for Social Responsibility of Supplier*, with the letters of commitment signed by all counterparties kept for filing as well.

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，确保矿产铂钯、再生铂钯来源符合LPPM尽职调查管理要求，并作出承诺，对涉及侵犯人权、冲突地区、贿赂、洗钱、恐怖主义融资、非法开采、世界遗产遗址等高风险地区的铂钯进行风险管理，确保铂钯的负责任采购。同时，公司建立的申诉渠道也列入了政策中以识别供应链中任何其它潜在的风险。

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 platinum and palladium in minerals and renewable platinum and palladium meet the LPPM due diligence management requirements and make commitments to carry out risk management for platinum and palladium from high-risk areas involving human rights violations, conflict areas, bribery, money laundering, terrorist financing, illegal mining, world heritage sites for the purpose of ensuring responsible purchase of platinum and palladium. Besides, the complaint channels established by the Company are also included in the policy to identify any other potential risks in the supply chain.

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、内部审计、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 audit and communication according to the issued policy and carry out management review of the due diligence system.

2.1规章制度方面

2.1 Rules and regulations

公司根据《LPPM负责任的铂钯指南》制订了《铂钯供应链尽职调查管理管理程序》，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 *LPPM Responsible Platinum and Palladium Guidance*, the Company has formulated the *Platinum and Palladium Supply Chain Due Diligence Management Procedure*, 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 red-headed 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、化验室负责人组成，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 selected from persons in charge of the Business Department, the Logistics Department, the Finance Department and the laboratory 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.

公司在2023年12月 5日对公司2023年度铂金钯金的尽职调查管理体系进行了管理评审，输出了管理评审报告并将该报告汇报给了合规风险总监和高级管理层。

On December 5, 2023, the Company carried out a management review of the Company’s due diligence management system for platinum and palladium in 2023 and output a management review report to be submitted to the Compliance Risk Director and senior management.

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LPPM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，最后形成标准铂钯锭，分配唯一编号。

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 LPPM 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 platinum and palladium ingots with unique numbers assigned.

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 should monitor 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，每批来料编号唯一，生产可追溯，对于所有的原料入库均保留完整的单据资料，对于入库的铂钯料保存有入库单、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、检测部、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 should check the supply chain due diligence. 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 platinum and palladium 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 Department 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LPPM负责任的铂钯指南进行培训，确保供应链尽职调查管理工作落到实处。2023年6月10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LPPM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 LPPM Responsible Platinum and Palladium Guidance to ensure that the supply chain due diligence management is implemented. On June 10, 2023, the Company organized two pieces of training on LPPM 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。公司还建立了《贵金属供应链反洗钱规章制度》。

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. The Company also established the *Anti-Money Laundering Rules and Regulations of Precious Metals Supply Chain*.

4.强化合作，协助铂钯供应链交易方建立尽职调查能力

4. Strengthening of cooperation and assistance in platinum and palladium supply chain counterparties to establish due diligence capabilities

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》并扩展至环境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 environmental and sustainability responsibilities.

公司将铂钯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。公司要求所有的供应商/交易方都要严格遵守合同和法律的规定并与所有供应商/交易方都签署《供应商社会责任承诺书》，承诺铂钯来源合法、合规，符合LPPM规定。同时，为了最大程度的提升供应链交易方的尽职调查能力和实践，公司在2023年10 月 8日召集供应商进行了尽职调查的培训并分享公司的尽职调查经验。

The Company communicates the policies and requirements of the platinum and palladium supply chain to relevant counterparties through e-mail and other ways. The Company requires all suppliers/counterparties to strictly abide by the provisions of contracts and laws, and signs a *Letter of Commitment for Social Responsibility of Supplier* with all suppliers/counterparties, promising that the source of platinum and palladium is legal, compliant and in line with LPPM regulations. Besides, the Company called suppliers together to undergo due diligence training and share the Company’s due diligence experience on October 8, 2023 in an attempt to improve the due diligence ability and practice of supply chain counterparties to the greatest extent.

5.建立机密申诉机制

5. Establishment of a confidential complaint mechanism

公司利用官方网站链接：<http://www.yuexin9999.com/index.php-id=1503.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采矿、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 announces the telephone and email address through the official website link: <http://www.yuexin9999.com/index.php-id=1503.htm> and 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 complaint handling procedure to protect the privacy of employees throughout the complaint 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 complaints from employees and external stakeholders.

6. 环境，社会和治理（ESG）因素

6. Environmental, social and governance (ESG) factors

环境方面，公司建立了环境管理体系，并获得了 ISO 14001 的有效证书。在公司的体系手册中定义了管理公司生产和运营中的环境风险，特别是对空，水和土地污染的管理。公司获得了当地环保局发放的《环境影响报告》。公司建立了危险化学品的管理流程来对化学品的存储、操作和处理进行管理。公司的运营和采购不涉及任何的破换世界遗产保护、影响土著人民等。

With regard to environment, the Company established an environmental management system and obtained a valid certificate of ISO 14001. The environmental risks in the production and operation of the management company were defined in the Company’s system manual, especially the management of air, water and land pollution. The Company obtained the *Environmental Impact Report* issued by the local environmental protection bureau. Moreover, the Company established the hazardous chemicals management process to manage the storage, operation and handling of chemicals. The Company’s operation and procurement did not involve any damage to the protection of world heritage or influence on indigenous people.

在社会责任方面，公司建立了《人事管理制度》并明确定义了员工工作时间，薪酬，奖励制度，禁止童工和强迫劳工、反对骚扰和虐待等等。公司也未发生过与童工，强迫劳工等人权有关的事件。

With regard to social responsibility, the Company established the Personnel Management System and clearly defined the working hours, salary and reward system of employees, prohibiting child labor and forced labor, and opposing harassment and abuse. The Company had no incidents related to human rights such as child labor and forced labor.

在商业诚信和道德规范管理方面，公司制定了支持 EITI 的政策，并在 2023 年 6 月 10 日对员工进行了 EITI 的培训。

With regard to business integrity and ethical management, the Company formulated a policy to support EITI, and conducted EITI training for employees on June 10, 2023.

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LPPM铂钯责任指南第二步“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回收铂钯，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，未发现警示信号和高风险供应链。

The Company has strictly complied with the requirements of Step 2 of the LPPM Responsible Platinum and Palladium 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 platinums and palladiums recycled in China. According to the Company’s identification procedures for conflict-affected and high-risk areas, China is determined as a low-risk area and no warning signal and 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，铂钯冶炼公司识别相关风险，密切关注来自侵犯人权、武装冲突、非法开采及源于世界遗产遗址等地区的铂钯，以及用于贿赂、洗钱、恐怖主义融资等行为的铂钯。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, platinum and palladium smelting companies identify relevant risks and pay close attention to platinums and palladiums from areas involving human rights violations, armed conflicts, illegal mining, and world heritage sites, as well as platinums and palladiums 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，受益人信息及其制裁清单和政治敏感人物验证结果，矿山客户还需要提供采矿许可证、环评认证以及关注矿工佩戴劳保、健康安全交易、职业病体检。

(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, beneficiary information and its sanctions list and verification results of politically sensitive people and mine clients should also be required to provide mining permits and environmental impact assessment certification. Attention should be paid to the wearing of labor protection appliances, health and safety transactions and occupational disease examination of miners.

（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，向供应商传达铂钯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 platinum and palladium smelting companies should be conveyed to suppliers and the suppliers should be required to sign the policy.

公司通过《供应商问卷调查表》对供应商上述信息的收集和识别，并实施了解您的交易方流程，未识别出高风险的供应商。

The Company collected and identified the above information of suppliers through the *Supplier Questionnaire*, and implemented the process of “know your customer”, failing to identify high-risk suppliers.

2.2 受冲突影响和高风险地区的判定。公司制定了受冲突影响和高风险地区的识别流程。使用以下资源来识别公司铂金钯金供应链中的受冲突影响和高风险地区：

2.2 Determination of conflict-affected and high-risk areas. The Company has established the identification process of conflict-affected and high-risk areas. The following resources are used to identify conflict-affected and high-risk areas in the Company’s platinum and palladium supply chain:

1. 《联合国制裁清单》

1. *United Nations Sanctions List*

2. 《多德弗兰克法案》第 1502 条中列出的指明国家

2. Designated countries listed in section 1502 of *Dodd-Frank Act*

3. 欧盟受冲突影响和高风险地区清单

3. EU list of conflict-affected and high-risk areas

4. 《海德堡晴雨表》

4. *Heidelberg Barometer*

5. 《脆弱国家指数》

5. *Fragile State Index*

6. 联合国人权事务高级专员办事处在最近3年披露出因为铂金钯金的开采、贸易、加工、存储、运输所引发人权事件的国家和地区

6. Countries and regions where human rights incidents are caused by the mining, trading, processing, storage and transportation of platinum and palladium as disclosed by the Office of the United Nations High Commissioner for Human Rights in the last three years.

7. FATF国际反洗钱和反恐融资组织的灰名单中的国家/地区定于为高风险国家/地区。

7. High-risk countries/regions designated in the grey list of FATF International Anti-Money Laundering and Counter-Terrorism Financing Organization.

8. 高洗钱风险国家的可靠市场情报。

8. Reliable market information of countries with high money laundering risk.

公司还制定了警示信号的识别流程。

The Company also developed an identification process for warning signal.

在 2023 年财务年内，公司采购的所有的铂金和钯金原来皆为来自中国国内的旧首饰，皆为回收料。根据制定的高风险地区识别流程，中国没有被识别为受冲突影响和高风险区域，因此供应链中没有识别出受冲突影响和高风险地区以及红旗警示信号。

In fiscal year 2023, all platinum and palladium purchased by the Company were originally old jewelry from China and they were all recycled materials. According to the identification process established for high-risk area, China was not identified as a conflict-affected and high-risk area. Therefore, the conflict-affected and high-risk areas and red flag warning signals were not identified in the supply chain.

2.3高风险供应链和风险评估

2.3 High-risk supply chain and risk assessment

根据LPPM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 LPPM and OECD and in combination with the actual situation of the Company, the following high-risk supply chain evaluation criteria are specified:

1. 任何尽职调查指南中列出的警示信号

(1) Warning signal listed in any due diligence guidance

1. 矿产铂钯或再生铂钯来源于、中转或者运经受冲突影响和高风险地区；

(2) The mineral platinum and palladium or renewable platinum and palladium come from, and are transited to or transported to conflict-affected and high-risk areas;

1. 矿产铂钯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；

(3) The mineral platinum and palladium are claimed to come from a country with limited known reserves, resources or expected production;

1. 回收铂/钯的原产国已知或合理预期来自受冲突影响和高风险地区的铂/钯将经此地区中转，和/或有理由怀疑回收铂/钯源自铂/钯出口量有限的国家，或铂/钯供应商或其他已知上游公司位于洗钱风险较高的国家

(4) The country of origin of the recycled platinum/palladium knows or reasonably expects that platinum/palladium from conflict-affected and high-risk areas will transit through this area, and/or has reason to suspect that the recycled platinum/palladium originate from countries with limited platinum/palladium exports, or that platinum/palladium suppliers or other known upstream companies are located in countries with high money laundering risks.

1. 铂/钯供应商或其他已知上游公司或其最终受益所有人对铂/钯供应商有重大影响，且是政治敏感人物

(5) Platinum/palladium suppliers or other known upstream companies or their ultimate beneficial owners have great influence on platinum/palladium suppliers and are politically sensitive people.

1. 铂/钯供应商或其他已知上游公司积极参与高风险商业活动，如武器、赌博和博彩业、古董和艺术品、宗教和宗教领袖

(6) Platinum/palladium suppliers or other known upstream companies actively participate in high-risk commercial activities, such as weapons, gambling and gambling, antiques and artworks, religions and religious leaders.

1. 在供应链中，供应商或交易对手的地理路线因不明原因无法解释

(7) In the supply chain, the geographical route of suppliers or counterparties cannot be explained for unknown reasons.

1. 任何列在《铂钯负责任采购供应链尽职调查政策》中列出的风险被识别出：主要包括人权，冲突，治理和ESG 的风险。

(8) Any risks listed in the *Due Diligence Policy for Responsible Platinum and Palladium Purchase Supply Chain* are identified: mainly including human rights, conflicts, governance and ESG risks.

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，按照《经合组织指南》制定的风险缓解策略确认是否继续/停止/终止与交易方的交易，以减缓/降低/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 confirm whether to continue/stop/terminate the transaction with the counterparty according to the risk mitigation strategy formulated in the *OECD Guidance* for the purpose of mitigating/reducing/eliminating risks.

公司根据收集的 KYC,高风险区域和红旗警示信号的结论，以及上述风险评估标准，对各个供应商及其供应链进行了风险评估并完成了《尽职调查检查表》和《风险评估表》，得出了风险评估的结论，未识别出上诉的高风险以及我公司政策中所列出的风险，因此 2023 年的铂金和钯金的采购为低风险采购。

According to the collected conclusions of KYC, high-risk areas and red flag warning signals, as well as the above-mentioned risk assessment standards, the Company conducted risk assessment for various suppliers and their supply chains, with the *Due Diligence Checklist and Risk Assessment Form* completed, thus reaching the conclusion of risk assessment. The above high risk and the risks listed in our company's policies were not identified. Therefore, the procurement of platinum and palladium in 2023 was low-risk.

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，任何识别出的风险都需要定期会搞给合规总监，以便于做出正确的风险缓解和业务决策。2023年度评估所有铂钯供应商和供应链均为低风险，并该风险评估的结果已经汇报给合规总监。

The Company establishes a risk assessment reporting system, and any identified risks need to be reported to the Compliance Director regularly as part of efforts to make correct risk mitigation and business decisions. In 2023, all platinum and palladium suppliers and supply chains were assessed as low risk, and the results of this risk assessment were reported to the Compliance Director.

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LPPM铂钯责任指南第三步“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，不需执行做风险缓解。

The Company has strictly complied with the requirements of Step 3 of the LPPM Responsible Platinum and Palladium Guidance “design and implement strategies to respond to identified risks”. No high-risk supply chain was found in 2023 and it is unnecessary to take risk mitigation measures.

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，并在铂钯库中与其他成品铂钯分区域存放。

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 platinum and palladium produced from such raw materials should be numbered separately and stored in the platinum and palladium warehouses with other finished platinum and palladium 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铂钯、再生铂钯的冶炼，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 mineral platinum and palladium and renewable platinum and palladium 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 mineral platinum and palladium and renewable platinum and palladium may come from high-risk areas, it is necessary to immediately suspend the smelting of such mineral platinum and palladium and renewable platinum and palladium 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铂钯、再生铂钯提取、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 mineral platinum and palladium and renewable platinum and palladium, 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铂钯或再生铂钯的原产地证明文件，如相关政府部门出具的原产地证明；

(3) Provide certificates of origin of mineral platinum and palladium or renewable platinum and palladium 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；

(6) 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：安排独立第三方财务审计。**

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

公司严格遵守LPPM铂钯责任指南第四步“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年聘请RCS对公司2023年度铂钯供应链尽职体系进行审计。

The Company has strictly complied with the requirements of Step 4 of the LPPM Responsible Platinum and Palladium Guidance “conduct an independent third-party audit of the refiner’s due diligence practice” and will hire RCS to audit the 2023 platinum and palladium supply chain due diligence system of the Company in 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LPPM铂钯责任指南第五步“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 LPPM Responsible Platinum and Palladium Guidance “annual report on supply chain due diligence”.

公司每年通过深圳市粤鑫贵金属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 Refining 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年年终无铂钯评估结果为“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. At the end of 2023, there were no suppliers whose platinum and palladium 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.

1. 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《伦敦铂钯市场协会（LPPM）可靠铂钯指导原则》的要求，深圳市粤鑫贵金属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。纠正性行动计划单独传达给LPPM执行机构，以及《伦敦铂钯市场协会（LPPM）可靠铂钯指导原则》的管理人员。

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 *London Platinum and Palladium Market (LPPM) Responsible Platinum and Palladium Guidance*.Shenzhen Yuexin Precious Metals Co., is committed to continuous improvement and all corrective measures will be regularly monitored internally. The corrective action plan will be communicated separately to the LPPM implementing agency and the management personnel of the *London Platinum and Palladium Market (LPPM) Responsible Platinum and Palladium Guidance*.

1. 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.