



永兴贵研资源有限公司	内控文件名称：白银供应链风险减缓管理办法	内控版：第一版
内控文件编号：QB-SJ-LBMA202303	主控部门：生产技术部	
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白银供应链风险减缓管理办法 Risk Mitigation Regulations of Silver Supply Chain

为了严格遵守国际国内关于劳动者权利、环境保护、公平交易等各项法律法规，积极开展白银供应链尽职调查工作，以确保白银来源的合法性。根据《伦敦贵金属市场协会(LBMA)责任黄金白银指南》要求和《OECD 冲突影响地区和高风险地区矿产品责任供应链尽职调查指南》，特制定永兴贵研资源有限公司白银供应链风险减缓管理办法。

The risk mitigation regulations of silver supply chain of Sino-Platinum Metals(Yong Xing) Resources Co.,Ltd. have been established to strictly abide by the laws and regulations of the state on employee rights, environmental protection and fair trade, actively participate in the due diligence of the silver supply chain and ensure the legality of silver sources in accordance with the requirements of the London Bullion Market Association(LBMA) Responsible Silver Guideline and the OECD Guidelines on Responsible Mineral Supply Chain Due Diligence in Conflict-Affected and High-risk Areas .

1. 范围

1. Scope

本办法适用于永兴贵研资源有限公司(以下简称“公司”)根据白银供应链尽职调查政策已识别的所有风险。本办法所涉及的白银来源包括矿产银、再生银及 2018 年 1 月 1 日后生产的多种形式的库存白银。

The Regulations apply to all risks identified by Sino-Platinum Metals(Yong Xing) Resources Co.,Ltd.(hereinafter referred to as“the Company”) according to the silver supply chain due diligence policy. Sources of silver covered by the Regulations include mineral





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silver, recovered silver and various forms of stored silver produced after January 1, 2018.

2. 术语和定义

2. Terms and definitions

本办法中涉及的术语和定义均采用《伦敦贵金属市场协会（LBMA）责任白银指南》所描述的内容。

The terms and definitions involved in the Regulations are those described in the London Bullion Market Association (LBMA) Responsible Silver Guideline.

3. 风险减缓策略

3. Risk mitigation strategies

3.1. 所有尽职调查过程中收集的信息以及供应链风险评估内识别的真实情况以及潜在风险需上报合规组长，再由合规组长整理分析资料上呈合规总监。由合规总监最终确定风险级别。

3.1. All information collected during the due diligence process and the actual and potential risks identified in the supply chain risk assessment shall be reported to the Compliance Team Leader, who shall then sort out the information and submit them to the Compliance Director to determine the risk level.

3.2. 若白银供应链尽职调查结果得出如下结论，则需立即停止该白银交易并上报至有关部门：

3.2. If the due diligence results of silver supply chain reach the following conclusions, the silver transaction shall be immediately stopped and reported to the relevant departments:

1) 存在有关白银提取、运输或贸易的系统性或广泛人权侵犯行为，包括最严重的童工、酷刑、非人道以及侮辱人格对待方式、广泛的性暴力或其他严重反人





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权强迫劳动、战争罪、反人类罪或种族灭绝罪；

1) Systematic or widespread human rights violations relating to the extraction, transport or trade of silver, including the most serious forms of child labor, torture, inhuman and degrading treatment, widespread sexual violence or other serious forms of forced labor against human rights, war crimes, crimes against humanity or genocide;

2) 存在洗钱或恐怖主义融资；

2) Money laundering or terrorist financing;

3) 存在向非法的非政府武装组织提供直接或间接支持；

3) Direct or indirect support to illegal armed non-governmental organizations;

4) 存在通过欺诈掩盖白银的原产地；

4) Concealment of the origin of silver by fraud;

5) 有以上 4 种类别可能性较高的情况。

5) The possibility of the above four events is relatively high.

3.3 若白银供应链尽职调查结果得出如下结论，则需立即暂停该白银的冶炼，直至供应商在 6 个月之内提供可证明其不可能存在以下事项的其他数据文件或信息为止。若于 6 个月之内仍未提供相关证据，则立即停止该白银交易并上报至有关部门：

3.3. If the due diligence results of the silver supply chain reach the following conclusion, the refining of the silver shall be suspended immediately until the supplier provides additional data or information within 6 months that can prove that it is impossible to have the following matters. If relevant evidence is not provided within 6 months, the silver transaction shall be immediately stopped and reported to relevant departments:





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1)可能存在有关白银提取、运输或贸易的系统性或广泛人权侵犯行为，包括最严重的使用童工、酷刑、非人道以及侮辱人格对待方式、广泛的性暴力或其他严重反人权强迫劳动、战争罪、反人类罪或种族灭绝罪；

1) There may be systematic or widespread human rights violations related to the extraction, transportation or trade of silver, including the most serious use of child labor, torture, inhuman and degrading treatment, widespread sexual violence or other serious forced labor against human rights, war crimes crimes against humanity or genocide;

2)可能存在洗钱或恐怖主义融资；

2) There may be money laundering or terrorist financing;

3)可能存在向非法的非政府武装组织提供直接或间接支持；

3)There may be direct or indirect support to illegal armed non-governmental organizations;

4)可能存在通过欺诈掩盖白银的原产地；

4)There may be concealment of the origin of silver by fraud;

5)可能存在以上4种类别可能性较高的情况。

5) There may be situations with high possibility of the above four events.

3.4 若白银供应链尽职调查的内容未完全满足，且被评估的供应商正在积极配合的情况下，该白银供应链尽职调查结果得出以下结论，则可继续该白银的冶炼，并要求供应商在6个月之内提供可证明其并不存在以下事项的其他数据文件或信息。若在6个月之内仍未提供相关证据，则需立即停止该白银交易并上报至有关部门：

3.4. If the contents of the silver supply chain due diligence are not fully met and the evaluated suppliers are actively cooperating, the silver supply chain due diligence results reach the following conclusions. then the silver refining can be continued, and the suppliers are required





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to provide additional data or information within 6 months that can prove that they do not have the following matters. If relevant evidence is not provided within 6 months. the silver transaction shall be immediately stopped and reported to relevant departments:

1) 并未完成白银供应链尽职调查全部内容;

1) The silver supply chain due diligence has not been completed;

2) 向非法的公共或私人安全武装提供直接或间接支持;

2) Direct or indirect support to illegal public or private security forces;

3) 贿赂或非欺诈原因而误导矿产品的原产地;

3) Misleading the origin of mineral products by bribery or non-fraud reasons;

4) 未向政府缴纳应缴税费。

4) Failure to pay taxes payable to the government.

4. 风险减缓策略具体步骤

4. Specific steps of risk mitigation strategies

4.1 若白银供应链尽职调查结果符合 3.2 条款所述，则合规总监需立即召集相关合规专员开专项会议，通报与该被评估供应商解除合同关系，要求相关合规专员立即实施会议决定，并以书面文件上报上层领导。再由公司办公室上报相关政府部门。

4.1. If the due diligence results of the silver supply chain meet the requirements of Clause 3.2, the Compliance Director shall immediately assemble the relevant Compliance Officers to hold a special meeting to notify the termination of the contractual relationship with the evaluated supplier, and at the same time require the relevant Compliance Office to implement it immediately and prepare a written document to report to the





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upper leadership. Then the Company's office will report to the relevant government departments.

4.2 若白银供应链尽职调查结果符合 3.3 条款所述，则合规总监需立即召集相关合规专员开专项会议，通报立即暂停使用该被评估供应商提供的矿产银或再生银，直至其在 6 个月之内提供可供证明的其他数据文件或信息为止：

4.2. If the due diligence results of silver supply chain comply with Clause 3.3, the Compliance Director shall immediately assemble relevant Compliance Officers to hold a special meeting to notify the immediate suspension of the use of mineral silver or recovered silver provided by the evaluated supplier until it provides additional data or information for proving within 6 months

1) 提供证明不存在有关白银提取、运输或贸易的系统性或广泛人权侵犯行为的政府性文件，如被评估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 there is no systematic or widespread human rights violations related to silver extraction, transportation or trade, such as legality certificates issued by relevant public security or commercial departments in the place where the evaluated supplier is located;

2) 提供不存在洗钱或恐怖主义融资的证明文件；

2) Provide documentary evidence there is no money-laundering or terrorist financing;

3) 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；

3) Provide documentary evidence that no direct or indirect support has been provided to illegal armed groups;

4) 提供并未通过欺诈掩盖白银的原产地证明文件，如相关政府部门出具的原产地证明；





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Provide certificates of origin of silver that have not been covered up through fraud such as certificates of origin issued by relevant government departments;

由相关的合规专员负责收集以上所述其他数据文件或信息，并按时向合规组长汇报情况进展，合规组长制定监测报告上呈合规总监。若在6个月之内仍未提供相关证据，则需按4.1条款实施。

The relevant Compliance Officer is responsible for collecting the above-mentioned additional data or information and reporting the progress to the Compliance Team Leader on time. The Compliance Team Leader will prepare monitoring reports and submit them to the Compliance Director. If relevant evidence is not provided within 6 months, actions should be taken in accordance with Clause 4.1.

4.3 若白银供应链尽职调查结果符合3.4条款所述，则合规总监需立即召集相关合规专员开专项会议，通报可继续使用该被评估供应商提供的矿产银或再生银，直至其在6个月之内提供可以证明的其他数据文件或信息为止：

4.3. If the due diligence results of silver supply chain comply with Clause 3.4, the Compliance Director shall immediately assemble relevant Compliance Officers to hold a special meeting to notify that mineral silver or recovered silver can continue to be used until the evaluated supplier provides additional data or information for proving within 6 months:

1) 配合完成白银供应链尽职调查的内容；

1) Cooperate to complete the contents of due diligence in silver supply chain;

2) 提供并未向非法的公共或私人安全武装提供直接或间接支持的证明文件；

2) Provide documentary evidence that no direct or indirect support has



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been provided to illegal public or private security forces;

3) 提供并未贿赂或非欺诈原因而误导矿产品的原产地证明文件，如相关政府部门出具的原产地证明；

3) Provide certificates of origin that do not mislead mineral products by bribery or fraud, such as certificates of origin issued by relevant government departments;

4) 提供已向政府缴纳应缴税费的证明文件，如缴款凭证。

4) Provide documentary evidence that it has paid the taxes payable to the government, such as payment documents.

由相关的合规专员负责收集以上所述额外数据或信息，并按时向合规组长汇报情况进展，合规组长制定监测报告上呈合规总监。若在6个月之内仍未提供相关证据，则需按4.1条款实施。

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5. 要求和征求意见

5. Requesting and soliciting opinions

要求公司员工、供应商和商业伙伴遵守上述政策，并采取必要措施来保障上述政策的贯彻落实。愿意接受客户和相关组织的监督，并欢迎供应商和利益相关方对上述政策提供建议。

Employees, suppliers and business partners of the Company are required to abide by the above policies and take necessary measures to ensure the implementation of the above policies. We are willing to accept





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the supervision of customers and relevant organizations Any suggestions from suppliers and stakeholders on above policies will be helpful to us.

