



永兴贵研资源有限公司	内控文件名称：白银供应链尽职调查政策	内控版：第一版
内控文件编号：QB-SJ-LBMA202302	主控部门：生产技术部	
校准者：管有祥	生效日期：2023年01月	

# 白银供应链尽职调查政策

## Sino-Platinum Metals(Yong Xing) Resources Co.,Ltd.

### Silver Supply Chain Due Diligence Policy

#### 一 总则

##### I. GENERAL

永兴贵研资源有限公司认识到在高风险国际区域从事矿产开采、贸易、处理、出口存在可能形成重大负面影响的风险并认识到我们有尊重人权、不对国际社会产生负面影响义务。

Sino-Platinum Metals(Yong Xing) Resources Co.,Ltd. recognizes the risk of significant negative impacts on mineral exploitation, trade, processing and export in conflict-affected and high-risk areas and identifies our obligation to respect human rights and not-to contribute to conflict.

第一条、本政策用于白银供应链采购过程中涉及的风险及义务管控。

Article 1. This policy is used to control the risks and obligations involved in the silver supply chain procurement process.

第二条、公司市场营销部作为责任部门必须严格执行本政策

Article 2. As the responsible department, the Marketing Department of the company must strictly implement this policy.

#### 二 正文

##### II. TEXT

第三条、根据《伦敦贵金属市场协会(LBMA)责任白银指南》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尽职调查管理办法，白银供应链风险减缓管理办法。将这一政策办法纳入到从高风险国际区域负责任采购的合同或协议中，并传播此政策。





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Article 3. According to the requirements of the London Precious Metals Market Association (LBMA) Silver Code for Responsible Mineral Supply Chain, the OECD

Guidelines for Responsible Mineral Supply Chain Due Diligence in Conflict-Affected, The due diligence management measures and risk mitigation management measures for the silver supply chain of Sino-Platinum Metals (Yongxing) Resources Co., Ltd. were formulated. Integrate this policy approach into contracts or agreements for responsible procurement from high-risk international regions and disseminate this policy.

第四条、与矿产开采、贸易、处理有关的严重侵权行为：

Article 4. Serious infringements against rights related to mineral exploitation, trade and processing;

(一)、在高风险国际区域开展采购或者经营活动时，公司既不会容忍也不会以任何方式获利于、帮助、协助或便利任何一方实施如下行为：

1. When carrying out procurement or business activities in conflict-affected and high-risk areas, we will neither tolerate any following phenomena nor adopt any way to profit from, help, assist or facilitate any party to take the following actions:

(1) 最恶劣形式的童工；

1) The worst forms of child labor;

(2) 任何形式的酷刑、残暴、不人道和有辱人格的待遇；

2) Any form of torture, cruel, inhuman or degrading treatment;

(3) 任何形式的强迫或强制劳动，即以惩罚相威胁，在他人非自愿的情况下迫使从事一切劳动或服务；

3) Any form of forced or compulsory labor, That is, forcing others to perform all Labour or services involuntarily, under the threat





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of punishment;

(4) 其他严重侵犯和践踏人权的行为，包括但不限于：普遍的性暴力行为，纵容他人侵犯人权（从他人的侵犯人权行为中受益或疑似从中受益，容忍或疑似容忍他人侵犯人权）；

4) Other serious violations and abuses of human rights, including but not limited to: such as widespread sexual violence, condoning human rights violations (To benefit from or appear to benefit from human rights violations by others, and to tolerate or appear to tolerate human rights violations by others);

(5) 战争罪、反人类罪、种族灭绝罪或其他严重违反国际人道法的行为。

5) War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

我们有理由认为存在以上风险，我们将立即中止与该供应商的合作。

If we have reasonable grounds to believe that the above risks exist, we will immediately suspend the cooperation with the supplier.

(二)、公司不会容忍任何通过矿产开采、运输、交易、处理、出口为非国家武装团体提供直接或间接的支持。当这些非法的有组织武装团体和公共或私人安全武装关联方存在：

2. We will not tolerate any direct or indirect support to non-state armed groups through mineral exploitation, transportation, trade, processing or export. When these armed groups or associated parties have:

(1) 非法控制矿区，或以其他方式对运输路线、矿产资源交易地以及供应链的上游行为主体进行控制。

1) Illegal control of mine sites or other control of transportation routes, mineral trading points and upstream actors in the supply chain;

(2) 在矿区入口、通往矿区的沿线或矿产资源交易地非法征税勒索钱财或自然资源。

2) Illegal taxation or extortion of money or minerals at the entrance to the mine site, along transportation routes or at mineral transaction points;

(3) 对中间商、出口企业或国际贸易商非法征税或勒索。

3) Illegal taxation or extortion of middlemen, export enterprises or international traders.





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我们有理由认为，上游供应商从向非法的有组织武装团体和公共或私人安全武装关联方进行采购或与之存在关系，我们将立即中止与该供应商的合作。

We have reason to believe that the upstream supplier procured or has relationships with illegal organized armed groups and associated parties of public or private security forces, and we are immediately suspending our cooperation with that supplier.

(三)、腐败、洗钱和向政府支付的各项费用

3. Corruption, money laundering and payments to the Government

我们不会提出承诺、给予或索要任何贿赂，并且抵制索贿，不会为了掩盖或伪造矿产资源原产地，虚报矿产资源开采、交易、处理、运输、出口等活动应向政府缴纳的税收、费用和特许开采费而行贿。公司将对存在腐败洗钱风险的事件采取措施以消除腐败洗钱行为。我们将按时按期向有关政府缴纳所有应缴税费。

We will not offer, undertake, carry out or seek any bribes, and will resist temptation. We will not bribe the Government in order to cover up or forge the origin of minerals and falsely report the taxes, fees and concession fees that should be paid to the Government for mineral mining, trade, processing, transportation, export and other activities. We will adopt or take measures to eliminate money laundering behaviors in cases where there is a risk of money laundering. We will pay all taxes and fees payable to the relevant governments on time as scheduled.

如果我们发现上游供应商在白银供应链存在此类风险，将根据公司白银供应链风险减缓管理办法，要求供应商提供未涉腐败洗钱且已向政府缴纳应缴税费的证明文件，以及并未贿赂或非欺诈原因误导含银原料的原产地证明文件，从而使风险得到减缓或降低。白银供应链风险减缓管理办法实施六个月后仍未起到作用，我们将立即中止与上游供应商的业务合作。

If we find that upstream suppliers have such a risk in the silver supply chain, according to the Company's risk mitigation management measures of silver supply chain, we will require suppliers to provide certificates of origin that do not mislead minerals for bribery or fraud reasons, as well as certificates for proving that they do not involve money laundering and have paid taxes and fees payable to the Government, thus containing or reducing risks. If the risk mitigation management measures of silver supply chain have not helped for six months, we will immediately suspend cooperation with upstream supplier.

