



ZJ/ZD/YLB-111-2022

山 东 招 金 金 银 精 炼 有 限 公 司

Shandong Zhaojin Gold & Silver Refinery Co., Ltd.

供应商尽职调查规则 Supplier Due Diligence Rules

2022 年修正版
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关于 LBMA 负责任黄金（白银）的公告声明 Announcement Statement on LBMA Responsible Gold (Silver)

山东招金金银精炼有限公司 严格遵循《OECD 对受冲突影响地区和高风险地区负责任的黄金（白银）供应链的尽职检查指南》，作



为 LBMA 的一名正式成员，精炼积极参与并支持 LBMA 原料金、银可追溯性工作，严格遵守黄金（白银）供应链无冲突冶炼厂计划要求，并郑重声明：山东招金金银精炼有限公司收购的原料金（白银）无来自冲突影响地区及高风险地区，确保在供应链的任何节点上都没有资助冲突、参与侵犯人权、洗钱、恐怖主义融资等不良行为。

Shandong Zhaojin Gold & Silver Refinery Co., Ltd. strictly follows the *OECD's Due Diligence Inspection Guidance for Responsible Gold (Silver) Supply Chain in Conflict-Affected and High-Risk Areas*. As a full member of LBMA, the Company actively participates in and supports the traceability of gold and silver raw materials of LBMA and strictly complies with the requirements of the conflict-free smelter plan in the gold (silver) supply chain. Furthermore, it is solemnly declared that the raw material gold (silver) acquired by Shandong Zhaojin Gold & Silver Refinery Co., Ltd. does not come from conflict-affected areas or high-risk areas, and it ensures that no node in the supply chain occurs any bad behaviors such as financing conflicts, participating in human rights violations, money laundering, terrorist financing, etc.

为加强精炼公司黄金（白银）供应链合规性管理，根据 LBMA 指南要求，确保精炼公司收购的原料金（银）无风险、无侵犯人权、洗钱及恐怖分子筹资等影响，精炼公司制定了原料金（银）审查制度，凡精炼公司的供应商都应接受公司黄金（白银）管理机构的审查，并签订合同，各供应商应遵守国家相关法律法规，对供应的黄金（银）确保来源合规并符合国家环境保护及可持续发展战略要求。我公司只与合规的供应商合作，对不符合 LBMA 指南要求的供应商坚决予以抵制！请各供应商严格遵守本公司黄金（白银）供应链管理制度，请社会各界及公司全体员工监督，对违规操作进行举报，允许匿名举报！

In order to strengthen the compliance management of the gold (silver) supply chain of the Company, the Company has formulated a raw material gold (silver) review system in accordance with the requirements



of the LBMA Guidance to ensure that the raw material gold (silver) acquired by the Company is free from risks, human rights violations, money laundering, terrorist financing and other effects. All suppliers of the Company should be subject to the review by the gold (gold) management organization of the Company and sign contracts. Each supplier should comply with the relevant national laws and regulations to ensure that the source of the gold (silver) supplied is in compliance with the requirements of the national environmental protection and sustainable development strategy. The Company only works with compliant suppliers and resolutely resists suppliers that do not meet the requirements of the LBMA Guidance! All suppliers are requested to strictly comply with the Company's gold (silver) supply chain management system, and all sectors of the society and all employees of the Company are requested to supervise and report the non-compliance operation. Anonymous reporting is allowed!

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序号	职位	姓名	电话	邮箱
S/N	Position	Name	Tel	Email
1	高级管理人员	王晓宁	13583535996	280757628.qq.com
1	Senior Manager	Wang Xiaoning	13583535996	
2	合规管理员	孙晓辉	15269599219	155164151.qq.com
2	Compliance Manager	Sun Xiaohui	15269599219	

特此公告！

This is hereby announced!



ZJ/ZD/YLB-111-2022-2

供应链尽职调查规则适用范围

Scope of Supply Chain Due Diligence Rules

一、适用范围

I. Scope of application

1、为了打击系统或广泛的人权侵权行为，避免向武装冲突提供捐助，遵从高标准的反洗钱和反恐怖主义融资，根据《伦敦贵金属市场协会（LBMA）责任黄金（白银）指南》要求，对原料来源做尽职调查，使之符合 LBMA 交割标准，提升公司供应链管理水平，特制定本办法。

1. In order to combat systematic or widespread human rights violations, avoid contributing to armed conflicts, and comply with high standards of anti-money laundering and anti-terrorist financing, these Measures are formulated in accordance with the requirements of the *Guidance on London Bullion Market Association (LBMA) Responsible Gold (Silver) Guidance*, to conduct due diligence on the sources of raw materials, make them conform to the LBMA delivery standard, and improve the management level of the supply chain of the Company.

2、本黄金（白银）供应链尽职调查规则，适用于山东招金金银精炼有限公司、以及与山东招金金银精炼有限公司有黄金（白银）交易、黄金（白银）加工的所有黄金（白银）供应商、黄金（白银）相关合作伙伴。（包括黄金（白银）生产商、中间商、黄金（白银）交易商、出口商和运输商。）

2. These gold (silver) supply chain due diligence rules apply to Shandong Zhaojin Gold & Silver Refinery Co., Ltd., and all gold (silver) suppliers and gold (silver) related partners that conduct gold (silver) transactions and gold (silver) processing with Shandong Zhaojin Gold &



Silver Refinery Co., Ltd. (includes gold (silver) producers, brokers, gold (silver) traders, exporters and transporters.)



供应链公司内部组织架构及责任

Internal Organizational Structure and

Responsibilities of Supply Chain Companies

一、供应链公司内部组织架构

I. Internal organizational structure of supply chain companies

由股东选任董事组成董事会作为公司的决策机构，负责公司经营管理工作，由王乐译任公司董事长，欧阳勇为公司董事及李宜三为监事，王建军担任公司董事及总经理，公司授权的高级管理者，负责审批是否与高风险供应商合作，合同签订对供应商进行审查。

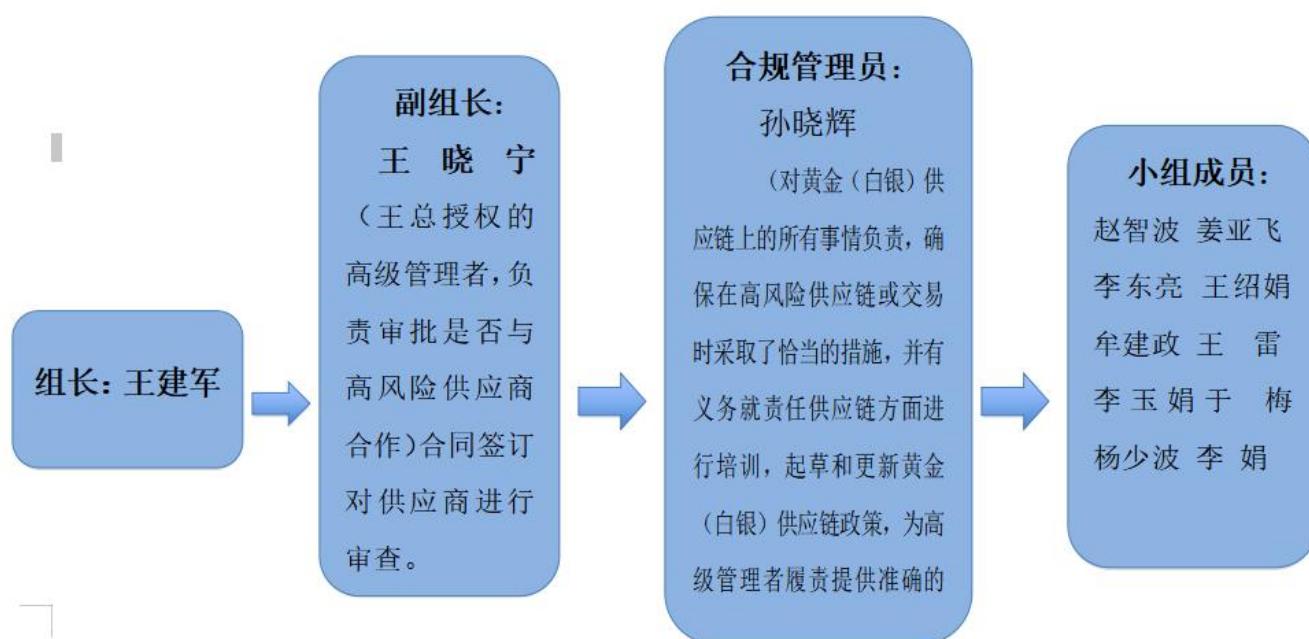
The Board of Directors, composed of directors elected by the shareholders, is the decision-making body of the Company and is responsible for the operation and management of the Company. Wang Le is the chairman of the Board. Ouyang Yong is the director of the Company and Li Yisan is the supervisor. Wang Jianjun is the director and general manager of the Company. The senior management authorized by the Company is responsible for examining and approving whether to cooperate with high-risk suppliers and reviewing suppliers when contracts are signed.

山东招金金银精炼有限公司为黄金（白银）供应链尽职调查设立了专门的组织，组织结构如下：



Shandong Zhaojin Gold & Silver Refinery Co., Ltd. has established a special organization for due diligence of the gold (silver) supply chain, with the following organizational structure:

黄金（白银）管理组织架构



Gold (Silver) Management Organization Structure

Team Leader: Wang Jianjun	Deputy Team Leader: Wang Xiaoning (Senior management authorized by General Manager Wang, who is responsible for approving whether to cooperate with high-risk suppliers) signing contracts and reviewing suppliers.	Compliance Manager: Sun Xiaohui (Be responsible for all aspects of the gold (silver) supply chain, ensuring appropriate measures are taken in high-risk supply chains or transactions, and obligated to provide training on responsible supply chains, draft and update the gold (silver)	Team members: Zhao Zhibo, Jiang Yafei, Li Dongliang, Wang Shaojuan, Mou Jianzheng, Wang Leishi, Li Yujuan, Yu Mei, Yang Shaobo and Li Juan.
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		supply chain policy, and provide accurate for senior management	
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二、供应链公司内部组织责任

II. Internal organizational responsibilities of supply chain companies

1、 高级管理员-王建军

1. Senior Manager-Wang Jianjun

公司授权的高级管理者，负责审批是否与高风险供应商合作）合同签订对供应商进行审查；任命合规官员管理尽职调查的日常工作，并授权主管含金物料采购部的副总经理审查尽职调查结果和风险管理策略。

The senior management authorized by the Company, who is responsible for approving whether to cooperate with high-risk suppliers) signing contracts and reviewing suppliers, appointing a compliance officer to manage the day-to-day work of due diligence and delegating the review of due diligence results and risk management strategies to the deputy general manager in charge of the Gold Material Procurement Department.

2、 合规管理员-孙晓辉

2. Compliance Manager-Sun Xiaohui

对黄金(白银)供应链上的所有事情负责，确保在高风险供应链或交易时采取了恰当的措施，并有义务就责任供应链方面进行培训，负责编制和更新《可靠黄金、白银供应链尽职调查管理政策》，审查含金、银物料采购部提交的尽职调查结果，评估风险管理策略的有效性，为高级管理者履责提供准确的信息。

Be responsible for all matters in the gold (silver) supply chain, ensuring that appropriate measures are taken in high-risk supply chains or transactions, and obligated to provide



training on the responsible supply chain, responsible for preparing and updating the *Reliable Due Diligence Management Policy for the Gold and Silver Supply Chain*, reviewing due diligence results submitted by the purchasing department of gold and silver-containing materials, assessing the effectiveness of risk management strategies, and providing accurate information for senior managers to fulfill their responsibilities.

合规风控员对黄金（白银）供应链上的所有事情负责。

The Compliance Risk Control Officer is responsible for everything in the gold (silver) supply chain.

（1）有权监查黄金（白银）供应链尽职调查过程，并评估尽职调查是否充分进行；如果认为必要，有权要求提供附加文件或信息。

(1) It has the authority to monitor the due diligence process of the gold (silver) supply chain and assess whether due diligence has been adequately performed; If deemed necessary, it has the right to request additional documents or information.

（2）如果存在高风险供应链或交易，需要及时向业务分管副总汇报。

(2) If there is a high-risk supply chain or transaction, it is required to report to the deputy general manager in charge of the business in a timely manner.

（3）定期对员工进行黄金（白银）供应链规则培训，不断更新黄金（白银）供应链规则，为高级管理层履责提供准确的信息。

(3) Employees are regularly trained on the rules of the gold (silver) supply chain, and the rules of the gold (silver) supply chain are continuously updated to provide accurate information for senior management to fulfill their responsibilities.

（4）每年至少一次对重要现货客户（年供应量达到 500KG）进行现



场调查;

(4) On-site surveys of significant spot customers with annual supply up to 500KG should be conducted at least once a year;

(5) 协助与鼓励现货黄金（白银）供应商承诺且书面确认遵守黄金（白银）供应链尽职规则;

(5) Suppliers of spot gold (silver) should be assisted and encouraged to commit and confirm in writing compliance with the due diligence rules of the gold (silver) supply chain;

(6) 如出现异常情况需及时向合高级管理者报告。

(6) If there is any abnormality, it shall be reported to the senior management in time.

3、 财务管理员负责对原料金仔细称重、产地鉴别记录，对交货人身份信息进行确认，保证黄金接收的准确性，负责对黄金投料前的保管。

3. The Financial Manager is responsible for carefully weighing the raw gold, recording the origin identification, confirming the identity information of the consignor, ensuring the accuracy of the gold receipt, and taking care of the gold before feeding.

4、 质检部要确保检测黄金成色的准确性，保证黄金实物的安全性。

4. The Quality Inspection Department shall ensure the accuracy of testing the fineness of gold and ensure the safety of gold objects.

5、 精炼车间组织黄金投料生产做好投料记录，在生产过程中采用封闭式流程，确保黄金生产加工的安全性与可追溯性。

5. The Refining Workshop organizes the production of gold feedstock and records the feedstock, and adopts a closed process in the production process to ensure the safety and traceability of gold production and processing.



6、 交易部在交易过程中，采用监督机制，确保交易的安全性，保证公司不参与恐怖主义融资。

6. During the transaction, the Trading Department adopts a monitoring mechanism to ensure the safety of the transaction and to ensure that the company does not participate in terrorist financing.

7、 企管部制定培训计划，对班组长以上人员组织培训，学习 LBMA 负责任黄金指南的相关内容，准确掌握公司负责任黄金管理的相关政策。

7. The Enterprise Management Department formulates a training plan to organize training for personnel above team leaders, learn relevant contents of the LBMA Responsible Gold Guidance, and accurately grasp relevant policies of the Company on responsible gold management.



ZJ/ZD/YLB-111-2022-4

高风险供应链评判标准

Evaluation Criteria of High-Risk Supply Chain

一、高风险黄金（白银）供应链注意事项加入高风险定义

I. High risk gold (silver) supply chain considerations add high risk definition

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；

1. Systematic and widespread human rights violations related to gold (silver) mining, transportation and trading;

2、直接或间接的支持非政府武装集团、公共或私人安全部队（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；

2. Direct or indirect support to non-governmental armed groups, public or private security forces (refer to OECD due diligence guidance for mineral supply chains in conflict-affected and high-risk areas;

3、贿赂而来或者是掩盖黄金（白银）真实来源；

3. Bribery or concealment of the true source of gold (silver);

4、洗钱和恐怖主义融资；

4. Money laundering and financing of terrorism;

5、加剧冲突。

5. Exacerbating the conflict.

6、来自于已知的受冲突影响和侵犯人权高风险地区，或者有理由怀疑是运经该高风险



地区的。

6. From areas known to be at high risk of conflict-affected and human rights violations, or where there is reason to suspect that they are being transported through such high-risk areas.

7、供应商或其上游公司已参与洗钱、犯罪、腐败的其他风险较高事宜；

7. Other high-risk matters such as the Supplier or its upstream company has been involved in money laundering, crime and corruption;

8、供应商方或其他已知的上游公司活动于高风险的商业领域，例如：武器装备、博彩和赌博业、钻石贸易、宗教及其领袖。

8. Suppliers or other known upstream companies operate in high-risk business areas such as weaponry, gaming and gambling, diamond trading, religion and their leaders.

9、来自于中国及其他国家政府机关公务人员身份。

9. From official status of China and other government agencies.

10、来自于有犯罪前科的经营者、涉黑背景的机构或个人。

10. From operators with criminal record, organizations or individuals with black background.

11、来自于那些已知储备少、资源储量少或预期产量水平低的国家。

11. From countries with low known reserves, low resource reserves or low expected production levels.

12、来自于已知的受冲突影响和侵犯人权高风险地区，或者有理由怀疑是运经该高风险地区的。

12. From areas known to be at high risk of conflict-affected and human rights violations, or where there is reason to suspect that they are being transported through such high-risk areas.



13、来自于或运经受冲突影响或侵犯人权高风险地区。

13. From or transported to areas with high risk of conflict or human rights violations.

14、不遵守环境和可持续发展法律要求，开采原料源于世界遗产遗址或国内自然生态保护区；

14. Non-compliance with environmental and sustainable development laws and requirements, and extraction of raw materials from world heritage sites or domestic natural ecological protection areas;

15、在公司供应链中确定为 CAHRA 的生产国或过境国的数量和名称。

15. The number and name of countries of production or transit identified as CAHRA in the corporate supply chain.

16、高风险是否与任何可疑的 OECD 附件 II 风险以及公司供应链中的环境和可持续性风险有关。

16. Whether the high risk is related to any suspected OECD Annex II risks and environmental and sustainability risks in the company's supply chain.

二、黄金（白银）供应链高风险类别标准

II. Gold (silver) supply chain high risk category criteria

1、矿产金（银）或再生金（银）来源于、中转或者运经冲突影响或侵犯人权高风险地区。

1. Mineral gold (silver) or recycled gold (silver) originates from, transits or travels through conflict-affected or high-risk areas for human rights violations.

2、矿产金（银）声称来源于一个已知储量有限、资源有限或预计黄金（银）产量有限的国家。



2. Mineral gold (silver) is claimed to originate from a country with limited known reserves, limited resources or limited expected gold (silver) production.

3、再生金（银）来源于已知的冲突影响和侵犯人权的高风险地区，或者有理由怀疑经此地区中转的。

3. Recycled gold (silver) originates from areas known to be at high risk of conflict impact and human rights violations, or has reason to suspect transit through such areas.

4、在黄金（白银）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. Companies in the gold (silver) supply chain or other known upstream companies are located in a country with high risks of money laundering, crime and corruption.

5、在黄金（白银）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. Profit owners of companies in the gold (silver) supply chain or other known upstream companies are politically sensitive.

6、在黄金（白银）供应链中的公司或其他已知的上游公司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，宗教和宗教领袖。

6. Companies in the gold (silver) supply chain or other known upstream companies are involved in high-risk commercial activities such as weapons, gambling, gambling, antiques and art, diamonds, religious and religious leaders.

7、供应商或其上游公司已参与洗钱、犯罪、腐败的其他风险较高事宜；

7. The Supplier or its upstream company has been involved in other matters with high risk of money laundering, crime and corruption;



8、不遵守环境和可持续发展法律要求，开采原料源于世界遗产遗址或国内自然生态保护区；

8. Non-compliance with environmental and sustainable development laws and requirements, and extraction of raw materials from world heritage sites or domestic natural ecological protection areas;

三、黄金（白银）供应链公司内部评估等级

III. Internal assessment grade of gold (silver) supply chain companies

风险分级表

序号	风险等级	风险级别 (R)	执行操作
1	低风险	$R \geq 6$ 分	控制风险继续交易
2	中风险	$2 \text{分} < R < 6 \text{分}$	减少风险暂停交易
3	高风险	$R \leq 2 \text{分}$	停止交易

Risk Classification Table

S/N	Risk grade	Risk level (R)	Operations performed
1	Low risk	$R \geq 6$ points	Control risk and continue trading.
2	Medium risk	$2 \text{ points} < R < 6 \text{ points}$	Reduce risk and suspend trading.
3	High risk	$R \leq 2 \text{ points}$	Stop trading



风险等级分值

Risk grade score

序号 S/N	评估方 Appraiser	评估内容 Assessment content	分值 Score
1	矿产 Minerals	1、采矿证件 1. Mining certificate	4 分 4 points
		2、黄金资源信息 2. Gold resources information	3 分 3 points
		3、受益人身份文件 3. Beneficiary identification document	2 分 2 points
		4、营业执照 4. Business license	5 分 5 points
		5、进/出口证明 5. Import/export certificate	4 分 4 points
2	再生 Regenerate	1、营业执照 1. Business license	4 分 4 points
		2、受益人身份 2. Beneficiary identification	2 分 2 points
		3、 供应商资质证明 3. Supplier qualification certificate	4 分 4 points
		4、供应来源证明 4. Proof of source of supply	3 分 3 points
3	冶炼厂 Smeltery	1、营业执照及资质 1. Business license and qualification	5 分 5 points
		2、有无进/出口许可证 2. Whether there is an import/export license	4 分 4 points
		3、进/出口证明 3. Import/export certificate	4 分 4 points



供应链尽职调查规定

Supply Chain Due Diligence Requirements

一、供应链尽职调查措施

I. Supply chain due diligence measures

公司内部对黄金（白银）交易、黄金（白银）加工的所有供应商建立相应的供应链尽职调查措施，并在交易时明确告知。供应链尽职调查措施主要包含：

Within the Company, appropriate supply chain due diligence measures are established for all suppliers of gold (silver) trading and gold (silver) processing, and they are clearly notified at the time of trading. The supply chain due diligence measures mainly include:

1、建立供应链客户档案。包括：名称、法定代表人、地址、联系方式、运营方式、交易合同等。

1. Creating a supply chain customer profile, including: name, legal representative, address, contact information, operation method, transaction contract, etc.

2、对既有供应链客户需进行年度核查，如有新建及变更的客户，需及时对其进行档案资料核查，并更新档案资料库。

2. Conducting annual verification on existing supply chain customers. If there are new or changed customers, it is required to conduct timely verification on their archives and update the archives database.

3、确定供应链的每一客户不在任何政府的洗钱、诈骗或恐怖主义通缉名单上。



3. Ensuring that each customer in the supply chain is not on any government's money laundering, fraud or terrorism wanted list.

4、定期获取供应链客户经营状况（包括商业与财务详情）及交易目的信息。

4. Obtaining regular information on the operating conditions (including commercial and financial details) and transaction objectives of the supply chain customers.

二、矿产金（银）客户

II. Mineral gold (silver) customers

矿产金（银）客户，在交易时，需注意以下问题，同时告知客户：

For mineral gold (silver) customers, attention should be paid to the following issues during the transaction and the customers should be informed of:

1、必须获得黄金的产地来源信息；

1. Obtaining information on the origin of gold;

2、提供采矿许可证；

2. Providing a mining license;

3、提供进/出口黄金（白银）或者精矿许可证；

3. Providing import/export licenses for gold (silver) or concentrates;

4、采矿情况信息证明，包括：是否侵犯人权、是否违规操作等；

4. Evidence of mining information, including: whether human rights have been violated, whether there has been any illegal operation, etc.;

5、开采能力数据；



5. Mining capacity data;

6、公司会持续不断的对矿产金客户进行尽职调查。

6. The Company will conduct due diligence on its customers of mineral gold on an ongoing basis.

7、是否超出国家规定的环境和可持续发展的规定事宜；

7. Whether it exceeds the national environmental and sustainable development regulations;

三、回收金（银）客户

III. Customers of recycled gold (silver)

回收金（银）客户在交易时，需注意以下问题，同时告知客户：

For customers of recycled gold (silver), the following issues should be noted and the customers should be informed of:

1、再生金（银）供应商需提供合法的商业关系，包括但不限于：再生金（银）来源证明、收益人证明等；

1. The Supplier of recycled gold (silver) shall provide legal commercial relationship, including but not limited to: source certificate of recycled gold (silver), beneficiary certificate, etc.;

2、公司会持续不断的对再生金（银）客户进行尽职调查。

2. The Company will conduct due diligence on the customers of recycled gold (silver) on an ongoing basis.

四、高风险情况处理步骤

IV. Procedures for handling high-risk situations

通过风险等级判断，显示高风险情况时，公司将采取以下步骤进行处理：



When the risk level judgment indicates a high-risk situation, the Company will take the following steps to deal with it:

1、现场调查/访问高风险供应链，证实供应链尽职调查文件记录的调查结果。

1. Conduct on-site investigations/visits to high-risk supply chains to substantiate findings documented in supply chain due diligence documents.

2、对于开采的黄金（白银）：使用可信的独立来源的文件、数据和信息来核实情况，从矿山到精炼厂，供应链中每一家公司（包括生产商、中间商、交易商、出口商和运输商）的收益所有人和政府监控名单信息都要求要核实。

2. For gold (silver) mined: verify the situation using documents, data and information from credible and independent sources, from mines to refineries, revenue owners of every company in the supply chain (including producers, middlemen, dealers, exporters and transporters) and government watch list information.

3、对于回收金(银)：使用可信的独立来源的文件、数据和信息来核实情况，从供应方到精炼厂，供应链中每一家公司（包括运输商）的收益所有人和政府监控名单信息都要求要核实。

3. For recovered gold (silver): verify the situation using documents, data and information from credible and independent sources, from the Supplier to the refinery, the revenue owners of each company in the supply chain (including transporters) and the government watch list information.



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供应商准入制度

Supplier Access System

为了规范我公司原料供应商的管理工作，特制订相应的供应商准入制度，具体要求如下：

To standardize the management of the Company's raw material suppliers, a corresponding supplier access system is specially formulated. The specific requirements are as follows:

一、针对现有合作的供应商：

I. For existing suppliers:

1、在规定的时间内，根据要求填写并提交《原料金(银)供应商准入申请表》，并同时提交相关的资质资料，所有资料法人需加盖单位公章或合同章、自然人须有亲笔签名按手印保证真实有效，资质资料包括以下几项：

1. It is required to fill in and submit the *Application Form for Admission of Gold (Silver) Suppliers of Raw Materials* as required within the specified time, and submit relevant qualification information at the same time. All information legal persons shall be affixed with the official seal of the unit or the contract seal, and natural persons shall provide their



own signatures and fingerprints to ensure authenticity and effectiveness. Qualification information includes the following:

(1) “三证合一、一证一码”的统一社会信用代码证

(1) Unified social credit code certificate of “three certificates in one, and one certificate in one code”

(2) 与业务有关的委托、授权文件

(2) Entrustment and authorization documents relating to the business

(3) 原料的合格证明、成色检验报告等质检资料

(3) Quality inspection data such as qualification certificates and color quality inspection reports of raw materials

(4) 其他能证明供应商实力的资信文件

(4) Other credit documents that can prove the strength of the Supplier

(5) 预留经办人身份证复印件，并签字按手印

(5) A copy of the ID card of the handling person shall be reserved and signed by hand.

2、以上资料审核通过后，制定《原料金（银）供应商准入申请表》，经原料部经理、分管副总签字审批后，进入合格供应商名单后备档留存。

2. After the above materials are reviewed and approved, the *Application Form for Admission of Gold (Silver) Suppliers of Raw Materials* is formulated. After being signed and approved by the manager of the Raw Materials Department and the deputy general manager in charge, it will be entered into the backup file of the qualified suppliers list and retained.

二、针对新增合作的供应商：

II. For new suppliers:



1、在与新供应商开展业务前，根据要求填写提交《原料金（银）供应商准入申请表》，并同时提交相关的资质资料，所有资料法人需加盖单位公章或合同章、自然人须有亲笔签名按手印保证真实有效，资质资料包括以下几项：

1. Before starting business with new suppliers, it is required to fill in and submit the *Application Form for Admission of Gold (Silver) Suppliers of Raw Materials* as required, and submit relevant qualification information at the same time. All information legal persons shall be affixed with the official seal of the unit or the contract seal, and natural persons shall provide their own signatures and fingerprints to ensure authenticity and effectiveness. Qualification information includes the following:

(1) “三证合一、一证一码”的统一社会信用代码证

(1) Unified social credit code certificate of “three certificates in one, and one certificate in one code”

(2) 与业务有关的委托、授权文件

(2) Entrustment and authorization documents relating to the business

(3) 原料的合格证明、成色检验报告等质检资料（根据客户经营性质，尽量让客户提供）。

(3) Quality inspection information such as qualification certificates and color quality inspection reports of raw materials (provided by customers as far as possible according to their business nature).

(4) 其他能证明供应商实力的资信文件

(4) Other credit documents that can prove the strength of the Supplier



2、以上资料审核通过后，由原料部业务员对供应商实地考察，并出具《负责任供应商风险等级评估表》经部门经理签字，然后填写提交《原料金（银）供应商准入申请表》，经综合评价后，合格的供应商经原料部业务员、原料部经理、分管原料副总签字审批后，方可与供应商开展业务，未经评价合格或审批的供应商不得与其开展业务。

2. After the above materials are reviewed and approved, the sales representative of the raw materials department will conduct on-the-spot inspection on the suppliers, and issue the *Risk Level Assessment Form for Responsible Suppliers*, which will be signed by the department manager, and then fill in and submit the *Application Form for Admission of Gold (Silver) Suppliers of Raw Materials*. After comprehensive evaluation, the qualified suppliers can only conduct business with the suppliers after being signed and approved by the sales representative of the raw materials department, the manager of the raw materials department and the deputy general manager in charge of raw materials. Suppliers that have not passed the evaluation or approval shall not conduct business with them.



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供应商管理制度

Supplier Management System

根据 LBMA 负责任管理要求，对供应商的调查、准入及持续管理应以下列顺序填写：

According to the responsible management requirements of LBMA, the investigation, access and continuous management of suppliers shall be completed in the following order:

①《原料金（银）供应商准入申请单》→②《原料金/银供应商尽职调查表》→③《负责任供应商风险等级评估表》→④《原料金/银购销及加工协议》→⑤《客户档案》→⑥《供应商生产能力调查表》

1. *Application Form for Admission of Gold (Silver) Suppliers of Raw Materials* 2. *Due Diligence Questionnaire for Gold/Silver Suppliers of Raw Materials* 3. *Risk Level Assessment Form for Responsible Suppliers* 4. *Agreement on Purchase, Sale and Processing of Gold/Silver Raw Materials* 5. *Customer Profile* 6. *Supplier Capacity Questionnaire*

要求与标准：

Requirements and standards:



一、纸质《原料金（银）供应商准入申请单》——业务经办人/内勤

I. Paper version of the *Application Form for Admission of Gold (Silver) Suppliers of Raw Materials-Business Handler/Back Office*

标准：

Standards:

1、供应商名称为客户真实合同签订人员；

1. The name of the Supplier is the actual contract signing personnel of the customer;

2、供应商地址为身份证登记地址；

2. The address of the Supplier is the ID card registration address;

3、联系人为合同签订人员或者直接业务经办人；

3. The contact person is the person who signed the contract or the person handling the direct business;

4、供应商性质为个人或者法人；

4. The Supplier is an individual or a legal person;

5、业务模式为自营或者加工；

5. The business model is proprietary or processing;

6、产品名称为矿产金（银）或者再生金（银）（包括首饰、金（银）条等深加工的）；

6. The product name is mineral gold (silver) or recycled gold (silver) (including jewelry, gold (silver) strips and other deep processing);

7、产品合格率为黄金（白银）含量；价格政策为合同约定的价格政策概述；

7. The qualified rate of products is the gold (silver) content; The price policy is an overview of the price policy agreed in the contract;



8、法人户要求按照营业执照内容将信息填写完整。

8. The legal entity requires the information to be completed in accordance with the business license.

9、经办人、部门经理、分管副总签字为完整版。

9. The full version is signed by the handling person, department manager and deputy general manager in charge.

二、电子版《原料金/银供应商尽职调查表》——业务经办人/内勤

II. Electronic version of the *Due Diligence Questionnaire for Gold/Silver Suppliers of Raw Materials*-Business Handler/Back Office

标准:

Standards:

1、按照调查表 40 项内容逐项进行调查落实;

1. Carry out investigation and implementation item by item according to 40 items in the questionnaire;

2、确保信息准确有效;

2. Ensure that the information is accurate and effective;

3、对不适用该项目的填写“不适用”

3. Fill in “N/A” for items that do not apply to the item

三、纸质《负责任供应商风险等级评估表》——业务经办人/内勤

III. Paper version of *Risk Level Assessment Form for Responsible Suppliers*-Business Handler/Back Office

标准:



Standards:

对照考察内容是否可在高风险与中风险都填写“否”，低风险填写“是”，由此结论为低风险，并由合规管理员签字。

According to the investigation content, whether “No” can be filled in for both high-risk and medium-risk and “Yes” for low-risk, so the conclusion is low-risk and signed by the Compliance Manager.

四、纸质《合同》和《廉洁合同》及附件（身份证、营业执照证、矿山需要有采矿证）——业务经办人

IV. Paper version of *Contract* and *Integrity Contract* and their attachments (ID card, business license, mining license required for mines)-Business Handler

标准:

Standards:

1、根据法务部下发的标准格式进行合同签订（客户版本除外）

1. The contract is signed according to the standard format issued by the legal department (except for the customer version)

2、法人户必须有营业执照及经办人签字盖章的身份证复印件。

2. The legal person must obtain a business license and provide a photocopy of the ID card signed and sealed by the handling person.

3、个人必须有签合同本人及合同约定经办人签字按手印的身份证复印件。

3. The individual must provide a copy of the ID card signed by himself and the person handling the contract.

4、矿山有在有效期内的采矿许可证。



4. There is a valid mining license for the mine.

五、客户档案——负责内勤

V. Customer Profile- Responsible Back Office

标准：

Standards:

1、客户名称为客户签订合同的名称，地址为身份证登记地址，业务经办为合同约定的经办人，联系电话为合同约定的电话，用户名为合同约定的入库单名，原料金(银)质量标准为原料金（银）的含量。

1. The name of the customer is the name of the contract signed by the customer. The address is the ID card registration address. The business manager is the handler agreed in the contract. The contact number is the phone number agreed in the contract. The user name is the name of the receipt document agreed in the contract. Moreover, the quality standard of raw material gold (silver) is the content of raw material gold (silver).

2、根据《负责任供应商风险等级评估表》填写风险等级。

2. The risk level is filled in according to the *Risk Level Assessment Form for Responsible Suppliers*.

3、政策按照合同约定的进行填写。法人户需填写法定代表人、注册资本（根据三证填写）。附：统一按照法人版本格式，要求业务政策内容如有变更，需及时录入登记，不得覆盖原政策内容。

3. The policy is completed as agreed in the contract. The legal person must fill in the legal representative and registered capital (based on three certificates). Attachment: The format of



the corporate version is uniform, requiring that any change in the business policy content should be registered in a timely manner and should not cover the original policy content.

六、纸质《供应商生产能力调查表》——业务经办人

VI. Paper version of *Supplier Capacity Questionnaire*-Business Handler

标准:

Standards:

1、调查方式现场或者电话调查，调查时间每年两次；

1. The investigation method is on-site or telephone investigation, and the investigation time is twice a year;

2、采矿、选矿能力以及矿石品位要与实际产量相匹配；

2. The mining, dressing capacity and ore grade should match the actual output;

根据 LBMA 相关审计要求，出现以下问题相关部门应在一个月之内派专人解决拜访，相关变更记录并在客户档案中体现。

According to relevant audit requirements of LBMA, relevant departments with the following problems shall assign special personnel to solve the visit within one month, and relevant change records shall be reflected in the customer files.

1、供应商出现股权变更的情况；

1. Changes in equity of the Supplier;

2、供应商经营层人员变动；

2. Changes in personnel at the Supplier operation level;

3、国家统一相关证件变更；

3. Changes in relevant national uniform certificates;



4、供应商出现被网络或媒体通报的负面事件。

4. Negative events of the supplier reported by the network or media.

注： 电子版表格由经办人员填写完毕后，交档案管理员加密保管。其它纸质文件与会签完毕合同装订成册，交合同管理员归档保管。

Note: The electronic form shall be filled out by the handling personnel and then submitted to the archivist for safekeeping. Other paper documents and the countersigned contract shall be bound into a book and filed with the manager for safekeeping.



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供应链交易监控

Supply Chain Transaction Monitoring

公司将对交易关联的过程贯穿始终的审查和监管，来确保交易时对供应链的了解和风险预测一致。对交易的监管运用基于风险的方法来开展。因此，公司对每一批收到的黄金获取并记录以下信息：

The Company will review and monitor the process of transaction correlation throughout to ensure that the supply chain understanding and risk forecast are consistent during the transaction. Regulation of transactions is carried out using a risk-based approach. Therefore, the Company obtains and records the following information for each batch of gold received:

一、矿产金（银）

I. Mineral gold (silver)

1、预估的重量和化验结果（来自供应方）。

1. Estimated weight and test results (from the Supplier).

2、航运/货运单据（运货/空运单、形式发票）。

2. Shipping/freight documents (freight/air waybill, proforma invoice).

3、高风险交易的进/出口表格。

3. Import/export forms for high-risk transactions.

二、回收金（银）



II. Recycled gold (silver)

1、预估重量（来自供应方）。

1. Estimated weight (from the Supplier).

2、航运/货运单据（运货/空运单、形式发票）。

2. Shipping/freight documents (freight/air waybill, proforma invoice).

3、回收金(银)出现高风险交易情况，公司必须要求客户提供相应文件进行相互印证，核实文件是否真实相符，同时进行交易背景调查，情况不一致的需要通过调查并得出书面调查结果。 每年各部门合规专员需向风控合规专员提交风险评估报告，由风控合规专员向高级管理层提交汇总后的风险评估报告。 公司高级管理层通过风险评估包括审批每一个评估为高风险的供应链，并每年重新决定是否继续与之保持商业关系。

3. In case of high-risk transactions of the recovered gold (silver), the Company must require the customers to provide corresponding documents to verify each other, verify whether the documents are true and consistent, and conduct a background survey of the transactions. In case of any inconsistency, the Company shall conduct a survey and obtain a written survey result. Each department's compliance officer is required to submit a risk assessment report to the Risk Control Compliance Officer every year, and the Risk Control Compliance Officer will submit a consolidated risk assessment report to the senior management. The senior management of the Company passes the risk assessment, including approving each supply chain assessed as high risk, and making a new decision on whether to continue the business relationship with it annually.



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黄金供应链尽职调查文件档案管理制度

Management System of Gold Supply Chain Due Diligence Documents and Archives

一、目的

I. Purpose

建立客户档案立卷、归档、整理、保管、利用、销毁等程序，确保客户档案完整、齐全、高质，档案资源得到妥善保管、有效利用和持续补充。

It is to establish procedures for filing, archiving, sorting, storage, utilization and destruction of customer files to ensure that customer files are integrated, complete and of high quality, and that file resources are properly kept, effectively utilized and continuously supplemented.

二、原则

II. Principle

档案应按照统一的要求和格式，遵照入档完整、准确、系统、安全和有效利用的原则进行。

The archives shall be formed according to unified requirements and format and in accordance with the principles of complete, accurate, systematic, safe and effective use of the archives.



三、归档范围

III. Scope of archives

1、与供应商签订的原料金（银）购销协议及原料金（银）加工协议。

1. Raw Material Gold (Silver) Purchase and Sale Agreement and Raw Material Gold (Silver) Processing Agreement signed with the Supplier.

2、供应商的入库、出库单据及成色单据。

2. Inbound and outbound documents and color forming documents of the Supplier.

3、供应商加工提货单。

3. Processing bill of lading of the Supplier.

4、供应商购销结算表及加工结算表。

4. Purchase and Sale Statement and Processing Statement of the Supplier.

四、档案人员职责

IV. Responsibilities of archivists

1、部门配备的专职档案人员，负责部门档案的收集、整理、保管、鉴定、统计工作。

1. The full-time archivists assigned by departments are responsible for the collection, collation, storage, identification and statistics of the department archives.

2、每年至少组织二次档案员培训，更新知识，明确归档范围，加强档案意识，查找日常不足，从档案材料形成之日起做好收集、积累工作。

2. Archivist training should be organized at least twice a year to update knowledge, clarify the scope of archiving, strengthen the awareness of archives, find daily deficiencies, and complete collection and accumulation from the date of formation of archival materials.



3、部门档案管理小组：

3. Departmental Archives Management Team:

组 长：部门经理；

Team Leader: Department Manager;

副组长：部门副经理；

Deputy Team Leader: Deputy Department Manager;

成 员：档案员。

Member: Archivists.

五、收集整理要求

V. Collection and sorting requirements

1、按照归档范围及时、完整、准确收集部门工作中形成的各种文件材料。

1. Various documents and materials formed in the work of the department are collected in a timely, complete and accurate manner according to the filing scope.

2、归档的文件其制作程序符合规范要求，制成材料具有耐久性。

2. The production procedures of the archived documents meet the requirements of the specifications, and the manufactured materials have durability.

3、卷内文件材料排列有序，反映问题集中，保持文件间的有机联系。

3. The documents and materials in the volume are arranged in order to reflect the concentration of problems and maintain the organic connection between the documents.

4、案卷标题简明确切，能充分提示卷内文件的主要内容。

4. The title of the case file is concise and exact, which can fully prompt the main contents of the documents in the volume.



5、卷内页号、目录、备考表和案卷封皮各项内容填写清楚、正确、完整。

5. The contents of the page number, catalogue, test preparation form and case cover in the volume are clearly, correctly and completely filled in.

6、档案分类、组卷科学，便于保管和利用。

6. The classification and composition of archives are scientific and easy to keep and use.

六、档案保管

VI. Archive keeping

1、对接收进综合档案室的档案，应按规定严格分类、组卷、编目，对不符合要求的案卷进行必要的补充、加工整理。

1. The files received into the Comprehensive Archives Room shall be strictly classified, organized and catalogued in accordance with the regulations, and the files that do not meet the requirements shall be supplemented and processed as necessary.

2、加强档案管理，编制科学、实用的档案检索工具，方便对档案的有效利用。

2. It is necessary to strengthen the management of archives and compile scientific and practical archives retrieval tools to facilitate the effective use of archives.

3、积极做好档案的利用工作，建立借阅登记等记录。

3. The use of archives shall be actively completed, and records such as borrowing registration shall be established.

4、加强档案信息资源的开发利用，维护档案实体的完整与安全。

4. The development and utilization of archival information resources shall be strengthened to maintain the integrity and security of archival entities.



5、对档案保管情况要定期检查，发现破损或变质的档案，应及时进行修补、复制或其他处理。

5. Regular inspection shall be conducted on the preservation of archives. Any damaged or deteriorated archives shall be repaired, copied or otherwise disposed of in a timely manner.

6、公司要保存足够的供应链的证明文件记录，按照供应链尽职调查系统的标准来评判风险的要求，来证明充分且持续的完成了尽职调查。记录保存至少 5 个会计年度。

6. The Company shall maintain sufficient supply chain supporting documentation to demonstrate that due diligence has been fully and consistently performed, in accordance with the requirements of the Supply Chain Due Diligence System for assessing risks. Records are kept for at least 5 fiscal years.

七、档案利用

VII. Archives utilization

1、凡本部门需查阅档案材料，应办理查阅登记手续，借出部门的档案必须经部门经理或副经理签字同意后方可借出；查阅档案需经本部门经理或副经理签字同意方可查阅，如需复印要登记清楚；

1. Where the department needs to consult the archival materials, it shall go through the procedures of consultation and registration, and the archives of the lending department must be signed by the department manager or deputy manager before lending; Access to the archives must be signed and agreed by the manager or deputy manager of the department. If photocopies are required, they must be registered clearly.

2、未办理查阅、借出手续或发现手续不全者，档案员拒绝提供查阅档案。



2. The archivist shall not provide access to the archives for those who fail to go through the procedures of access and lending or find the procedures incomplete.

3、查阅档案只限在指定场所进行，档案员要做好全程监督，未经批准不得将案卷带出。

3. Access to archives is limited to designated places. Archivists shall supervise the whole process, and the files shall not be taken out without approval.

4、在借阅过程中，应保持档案资料完整无缺，不得擅自涂改、拆页、撕毁、污损、划杠、拆角、添字等，对无故损坏档案者视情节轻重酌情处理。

4. In the process of borrowing, the archives shall be kept intact. It is not allowed to alter, open pages, tear up, deface, scratch, tear down corners, add words, etc. If the archives are damaged without reason, it shall be dealt with according to the seriousness of the case.

5、严守机密，不得翻阅和摘抄利用以外的档案。

5. Archives must be kept strictly confidential and it is prohibited to read or extract archives other than those used.



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黄金供应链尽职培训

Gold Supply Chain Due Diligence Training

公司每年会对黄金供应链中的所有员工进行该岗位规则的培训，并将培训计划纳入公司年度培训计划当中。

The Company will train all employees in the gold supply chain on this position rule and incorporate the training plan into the Company's annual training plan every year.

一、培训要求

I. Training requirements

相关科室班组长以上员工必须参加，并通过培训签到的形式进行相关培训确认。
员工学习在各自部门进行，做好记录留存。



The employees above the team leader of the relevant department must attend and confirm the relevant training through training sign-in. Employee learning is carried out in their respective departments and records are kept.

二、培训方式

II Training method

采用内训讲解授课方式，讲师由合规风控官指定，人力资源部配合安排。

Internal training is adopted to explain the teaching method, and the lecturers are designated by the Compliance Risk Control Officer, and the Human Resources Department shall cooperate in arranging the lectures.

三、培训反馈

III. Training feedback

培训后，由基层管理者进行培训效果检查，检查不合规者，进行再培训，再培训名单由基层管理者提供。

After training, the primary-level managers will check the training effect, checking the non-conformists and conducting retraining. The list of retraining will be provided by the primary-level managers.

四、培训档案

IV. Training archives

培训后，需建立相应培训档案，记录保存至少 5 个会计年度。

After training, corresponding training archives shall be established and kept for at least 5 accounting years.



山东招金金银精炼有限公司

Shandong Zhaojin Gold & Silver Refinery Co., Ltd.

二零二二年三月一日

March 1, 2022

（修正）

(Revised)