

深 圳 市 粤 鑫 贵 金 属 有 限 公 司  
**Shenzhen Yuexin Precious Metals Co., Ltd.**

# 规范文件 **Normative Document**

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## 第一章总则

### Chapter 1 General Provisions

**第一条** 为了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, 以确保原料来源的合法性。根据《LBMA 负责任的黄金指南》要求, 特制定本办法。

**Article 1** These Measures are formulated in accordance with *LBMA Responsible Gold/Silver Guidance* to strictly abide by the national laws and regulations on the rights of employees, environmental protection, fair trade, etc. and actively participate in the supply chain due diligence to ensure the legitimacy of the source of raw materials.

**第二条** 本办法适用于公司根据供应链尽职调查管理办法已识别的所有风险。本办法所涉及原料来源包括矿产金/银、再生金/银及生产的各种形式的库存黄金、白银。

**Article 2** These Measures are applicable to all risks identified by the Company in accordance with the Supply Chain Due Diligence Management Measures. The sources of raw materials involved in these Measures include mineral gold/silver, recycled gold/silver and various forms of stock gold and silver produced.

**第三条** 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）责任黄金（白银）指南》所描述的内容。

**Article 3** The terms and definitions involved in these Measures are all described in the *London Bullion Market Association (LBMA) Responsible Gold (Silver) Guidance*.

## **第二章风险减缓策略**

### **Chapter 2 Risk Mitigation Strategy**

**第四条风险汇报流程：**所有供应链尽职调查过程中收集的信息以及评估识别的实际以及潜在风险需上报合规风险专员，再由合规风险专员整理并计划风险减缓策略后上报合规总监。

**Article 4 Risk reporting process:** All the information collected during the supply chain due diligence and the actual and potential risks assessed and identified should be reported to the Compliance Risk Officer and The Compliance Risk Officer

should sort out the above contents, plan the risk mitigation strategy and then report it to the Compliance Director.

**第五条风险缓解策略：**供应链尽职调查结果得出以下结论，则需立即停止该交易并上报至有关人员：

Article 5 Risk mitigation strategy: If the following conclusions are drawn from the supply chain due diligence results, the transaction should be stopped immediately and reported to the relevant personnel:

1.存在有关矿产金/银、再生金/银提取、运输或贸易的系统性或广泛人权侵权行为，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或强制劳动、战争罪、反人类罪或种族灭绝罪；

1. There are systematic or widespread human rights violations related to the extraction, transportation or trade of mined gold/silver and recycled gold/silver, including the most serious case of child labor, torture, inhuman and degrading treatment, widespread sexual violence or other forced or compulsory labor of serious anti-human rights, war crimes, crimes against humanity or genocide;

2.存在向非法的非政府武装组织提供直接或间接支持；

2. There is direct or indirect support to illegal non-governmental armed groups;

3.存在非法征税或进行勒索的公共或私人安全武装提供直接或间接支持；

3. There is direct or indirect support provided by public or private security forces with illegal taxation or extortion;
4. 存在通过欺诈掩盖矿产金/银、再生金/银的原产地;
4. There is the origin of mined gold/silver and recycled gold/silver that is fraudulently concealed;
5. 存在洗钱或恐怖主义融资;
5. There is money laundering or terrorist financing;
6. 国内手续不全、非法开采的小型矿山以及开采黄金/白银源于手工开采;
6. There are small mines with incomplete domestic procedures and illegal mining and the mined gold/silver originating from manual mining;
7. 存在行贿受贿及矿产原产地的欺诈性失实陈述;
7. There are fraudulent misrepresentations of bribery and the origin of minerals;
8. 开采黄金利用汞生产而得;
8. Utilization of mercury production for mining gold;
9. 不遵守环境和可持续发展法律要求, 开采黄金/白银源于世界遗产遗址或国内生态自然保护区;
9. The mined gold/silver does not comply with the legal requirements of the environment and sustainable development and originate from world heritage sites or domestic ecological nature reserves;

10.存在矿产资源开发过程中引起的土壤侵蚀、水土流失、土地沙漠化;地面开裂、沉降、塌陷,山体崩塌、滑坡、泥石流等地质灾害;

10. There are soil erosion, water and soil loss and land desertification caused by the development of mineral resources, ground cracking, settlement, collapse, mountain collapse, landslide, debris flow and other geological disasters;

11.存在废渣、废水、废气排放对水体、土壤、空气的污染;对野生动植物资源和自然地质地貌景观的破坏、危及公民健康和财产损失;

11. There is the pollution of water, soil and air caused by waste residue, waste water and waste gas emissions, damage to wildlife resources and natural geological and geomorphic landscape and danger to citizens' health and property;

12.存在以上 11 种事项可能性较高的情况。

12. There is a high possibility of the above 11 items.

**第六条:** 供应链尽职调查结果得出以下结论,则需立即暂停该矿产金/银、再生金/银的冶炼,直至供应商在 6 个月之内提供可证明其并不可能存在以下事项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:

**Article 6:** If the following conclusions are drawn from the supply chain due diligence results, the smelting of the mineral gold and recycled gold should be suspended immediately until

the supplier provides additional data or information within 6 months that can prove that the following matters are unlikely to exist. If relevant evidence is not provided within 6 months, the transaction should be stopped immediately and reported to the relevant personnel:

1.可能存在有关矿产金/银、再生金/银提取、运输或贸易的系统性或广泛人权侵权行为，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 mined gold/silver and recycled gold/silver, including the most serious case of child labor, torture, inhuman and degrading treatment, widespread sexual violence or other forced labor of serious anti-human rights, war crimes, crimes against humanity or genocide;

2.可能存在向非法的非政府武装组织提供直接或间接支持；

2. There may be direct or indirect support to illegal non-governmental armed groups;

3.存在非法征税或进行勒索的公共或私人安全武装提供直接或间接支持；

3. There is direct or indirect support provided by public or private security forces with illegal taxation or extortion;

- 4.可能存在通过欺诈掩盖矿产金/银、再生金/银的原产地;
4. There may be the origin of the mined gold/silver and recycled gold/silver that is fraudulently concealed;
- 5.可能存在洗钱或恐怖主义融资;
5. There may be money laundering or terrorist financing;
- 6.可能国内手续不全、非法开采的小型矿山以及开采黄金/白银源于手工开采;
6. There may be small mines with incomplete domestic procedures and illegal mining and the mined gold/silver originating from manual mining;
- 7.可能开采黄金利用汞生产而得;
7. Utilization of mercury production for mining gold;
- 8.存在行贿受贿及矿产原产地的欺诈性失实陈述;
8. There are fraudulent misrepresentations of bribery and the origin of minerals;
- 9.可能不遵守环境和可持续发展法律要求, 开采黄金/白银源于世界遗产遗址或国内生态自然保护区;
9. The mined gold/silver may not comply with the legal requirements of the environment and sustainable development and originate from world heritage sites or domestic ecological nature reserves;
- 10.存在矿产资源开发过程中引起的土壤侵蚀、水土流失、土地沙漠化;地面开裂、沉降、塌陷, 山体崩塌、滑坡、泥石流



流等地质灾害；

10. There are soil erosion, water and soil loss and land desertification caused by the development of mineral resources, ground cracking, settlement, collapse, mountain collapse, landslide, debris flow and other geological disasters;

11. 存在废渣、废水、废气排放对水体、土壤、空气的污染;对野生动植物资源和自然地质地貌景观的破坏、危及公民健康和财产损失；

11. There is the pollution of water, soil and air caused by waste residue, waste water and waste gas emissions, damage to wildlife resources and natural geological and geomorphic landscape and danger to citizens' health and property;

12. 存在以上 11 种事项可能性较高的情况。

12. There is a high possibility of the above 11 items.

**第七条：**若供应链尽职调查的内容并未完全满足，且被评估的供应商正在积极配合的情况下，该供应链尽职调查结果得出以下结论，则可继续该矿产金/银、再生金/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额外数据或信息。若在 6 个月之内仍未提供相关证据，则需立即停止该交易并上报风险合规专员：

**Article 7:** If the contents of the supply chain due diligence are not fully met and the assessed supplier is actively cooperating with the due diligence, the smelting of the mined gold/silver and recycled gold/silver can be continued and the supplier is

required to provide additional data or information within 6 months that can prove that the following matters are unlikely to exist under the premise that the following conclusions are drawn from the supply chain due diligence results. If relevant evidence is not provided within 6 months, the transaction should be stopped immediately and reported to the Risk Compliance Officer:

1.并未完成供应链尽职调查全部内容；

1. The supply chain due diligence has not been fully completed;

2.向非法的公共或私人安全部队提供直接或间接支持；

2. Direct or indirect support is provided to illegal public or private security forces;

3.贿赂或非欺诈原因而误导矿产金/银、再生金/银的原产地；

3. There is misleading information on the origin of mined gold/silver and recycled gold/silver by bribery or non-fraudulent reasons;

4.未向政府缴纳应缴税费。

4. The due taxes are not paid to the government.

### 第三章风险减缓策略具体计划

#### Chapter 3 Specific Plan of Risk Mitigation Strategy

第八条若供应链尽职调查结果符合第五条款所述，则合规风险专员需立即组织相关合规专员召开专项会议，通报与

该供应商解除合同关系，同时要求相关合规专员立即实施，并形成书面文件上报合规总监，审批后上报相关政府部门。

**Article 8** If the supply chain due diligence results comply with the requirements of Article 5, the Compliance Risk Officer should immediately organize the relevant Compliance Officers to hold a special meeting to notify them to terminate the contractual relationship with the supplier. Meanwhile, the relevant Compliance Officers should be required to implement it immediately, forming a written document and submitting it to the Compliance Director, and then submitting it to the relevant government departments after approval.

**第九条**若供应链尽职调查结果符合第六条款，则合规风险专员需立即组织相关合规专员召开专项会议，通报立即暂停使用该供应商提供的矿产金/银或再生金/银，直至其在6个月之内提供可供证明的额外数据或信息为止：

**Article 9** If the supply chain due diligence results comply with Article 6, the Compliance Risk Officer should immediately organize the relevant Compliance Officers to hold a special meeting to notify them to immediately suspend the use of the mined gold/silver and recycled gold/silver provided by the supplier until the supplier provides additional data or information that can be proved within 6 months:

1.提供证明不存在有关矿产金/银、再生金/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. Providing government documents proving that there are no systematic or extensive human rights violations related to extraction, transportation or trade of mined gold/silver and recycled gold/silver, such as the legitimacy certificate issued by the relevant public security bureau or commercial department where the supplier is 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. Providing documents proving that it has not provided direct or indirect support to illegal armed groups;

3.提供并未通过欺诈掩盖矿产金/银或再生金/银的原产地证明文件，如相关政府部门出具的原产地证明；

3. Providing certificates of origin of mined gold/silver and recycled gold/silver that have not been fraudulently concealed, 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. Providing 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. Providing qualification certificates of domestic small mines;

6.提供能够证明开采黄金不是利用汞生产而得资料；

6. Providing data to prove non-existence of utilization of mercury production for mining gold;

7.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. Providing policies and system documents related to environment and sustainable development and the environmental impact assessment report issued by relevant departments;

由相关的合规专员负责收集以上所述额外数据或信息，并按时向合规风险专员汇报情况进展。若在6个月之内仍未提供相关证据，则需按第八条款实施。

The relevant Compliance Officer is responsible for collecting the above additional data or information and reporting the progress to the Compliance Risk Officer on time. If relevant evidence is not provided within 6 months, it should be implemented according to Article 8.

**第十条**若供应链尽职调查结果符合第七条款所述，则合规风险专员需立即组织相关合规专员召开专项会议，通报可继续使用该供应商提供的矿产金/银或再生金/银，直至其在6个月之内提供可供证明的额外数据或信息为止：

**Article 10** If the supply chain due diligence results comply with the requirements of Article 7, the Compliance Risk Officer should immediately organize the relevant Compliance Officers to hold a special meeting to notify them that the mined

gold/silver and recycled gold/silver provided by the supplier can be continued for use until the supplier provides additional data or information that can be proved within 6 months:

1.配合完成该供应链尽职调查的内容；

1. Cooperating to complete the supply chain due diligence;

2.提供并未向非法的公共或私人安全部队提供直接或间接支持的证明文件；

2. Providing documents proving that it has not provided direct or indirect support 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金/银或再生金/银的原产地证明文件，如相关政府部门出具的原产地证明；

3. Providing documents proving that there is not misleading information on the origin of mined gold/silver and recycled gold/silver due to bribery or fraud, such as the certificate 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，如付款凭证。

4. Providing supporting documents, such as the payment voucher, proving that the due taxes have been paid to the government.

由相关的合规专员负责收集以上所述额外数据或信息，并按时向合规风险专员汇报情况进展。若在6个月之内仍未提供相关证据，则需按第八条款实施。

The relevant Compliance Officer is responsible for

collecting the above additional data or information and reporting the progress to the Compliance Risk Officer on time. If relevant evidence is not provided within 6 months, it should be implemented according to Article 8.

**风险缓解计划进展监控：**风险缓解计划实施后，相关的风控专员就供应商提供材料证据与反馈的过程进行记录，对供应商所提交的材料进行核实与审查，确保风险缓解计划进展与实施的有效性并记录。

**Risk mitigation plan progress monitoring:** After the implementation of the risk mitigation plan, the relevant risk control officers will record the process of the supplier providing material evidence and feedback and verify and review the materials submitted by the supplier to ensure the effectiveness of the progress and implementation of the risk mitigation plan and record them.

**风险缓解策略实施再评估流程：**

**Risk mitigation strategy implementation reassessment process:**

1. 在违反第六条而立即暂停该矿产金/银、再生金/银的冶炼的情况下，供应商在6个月之内提供可证明其并不可能存在第六条事项的恢复正常合作，若在6个月之内仍未提供相关证明，则需立即停止该交易并上报至有关人员。

1. In the event that the smelting of the mined gold/silver and recycled gold/silver is immediately suspended due to a

violation of Article 6, normal cooperation should be resumed if the supplier can prove that the matters in Article 6 cannot exist within 6 months. If the relevant certificate is not provided within 6 months, the transaction should be immediately stopped and reported to the relevant personnel.

2. 在违反第七条供应链尽职调查的内容并未完全满足, 但被评估的供应商正在积极配合的情况下, 则可继续该矿产金/银、再生金/银的冶炼, 但要求供应商在 6 个月之内提供可证明其并不存在第七条所列事项的额外数据或信息。若在 6 个月之内仍未提供相关证据, 则需立即停止该交易并上报风险合规专员。

2. If the contents of the supply chain due diligence in violation of Article 7 are not fully met but the assessed supplier is actively cooperating with the due diligence, the smelting of the mined gold/silver and recycled gold/silver can be continued and the supplier is required to provide additional data or information within 6 months that can prove that the matters listed in Article 7 are unlikely to exist. If relevant evidence is not provided within 6 months, the transaction should be stopped immediately and reported to the Risk Compliance Officer.

## 第四章要求

### Chapter 4 Requirements

第十一条要求公司员工、供应商和商业伙伴遵守上述管



理办法，并采取必要措施来保障上述管理办法的贯彻落实。

**Article 11** The Company's employees, suppliers and business partners are required to comply with the above Management Measures and take necessary measures to ensure the implementation of the above Management Measures.

第十二条公司风险合规专员会定期与不定期就上述要求对供应商是否存在相关风险或违反相关条例进行抽查或调查，如发现相关违规行为，根据上述流程进行处理、记录，并提高风险评价。

**Article 12** The Risk Compliance Officer of the Company will regularly and irregularly spot-check or investigate whether the supplier has relevant risks or violates relevant regulations in accordance with the above requirements. If any violations are found, they will be handled and recorded according to the above process and the risk evaluation will be strengthened.

## 第五章附则

### Chapter 5 Supplementary Provisions

第十三条本管理办法自发布之日起实施。

**Article 13** These Measures should be implemented as of the date of promulgation.

第十四条本管理办法风控部负责解释。

**Article 14** The Risk Control Department should be responsible for the interpretation of these Measures.

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