

附件

Annex

供应链风险减缓管理办法 Management Measures for Risk Mitigation of Supply Chain

第一章总则

Chapter I General Rules

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《伦敦贵金属市场协会(LBMA)责任黄金（白银）指南》要求，特制定本办法。

Article 1 In order to strictly comply with the national laws and regulations on employee's rights, environmental protection, fair dealing, etc., the Company shall actively participate in the due diligence of supply chain to ensure the legitimacy of raw material sources. According to requirements of *London Bullion Market Association (LBMA) Responsible Gold (Silver) Guidelines*, the Measures are hereby formulated.

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、再生金及 2019 年 1 月 1 日后生产的各种形式的库存黄金、白银。

Article 2 The Measures are applicable to all risks identified by the Company on the basis of the supply chain due diligence

management measure. The sources of raw materials involved in the Measures include mineral gold, regenerated gold, and stocked gold and silver in various forms produced after January 1, 2019.

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 Terms and definitions involved in the Measures apply the contents described in *London Bullion Market Association (LBMA) Responsible Gold (Silver) Guidelines*.

第二章风险减缓策略

Chapter II Risk Mitigation Strategies

第四条 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后上报合规总监。

Article 4 All information collected during the due diligence of supply chain and the actual and potential risks identified in evaluation shall be reported to the Risk Compliance Officer, and then the Risk Compliance Officer sorts it out and reports it to the Compliance Director.

第五条 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 If the due diligence results draw the following conclusions, it is needed to stop the deal immediately and report it to 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 are systematic or extensive human rights violations related to the extraction, transportation or trade of mineral gold (silver) and regenerated gold (silver), including the most seriously child laboremploying, cruel torture, inhuman and degrading treatment, extensive sex violence, other forced 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. Direct or indirect supports are provided to illegal non-governmental armed organizations;

3.存在通过欺诈掩盖矿产金(银)、再生金(银)的原产地；

3. The origin of mineral gold (silver) and regenerated gold (silver) is concealed by cheating;

4.存在洗钱或恐怖主义融资；

4. There is money laundering or terrorist financing;

5.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；

5. Small mines are exploited illegally with incomplete domestic procedures and the gold (silver) is mined through

manual mining.

6. 开采黄金（白银）利用汞生产而得；

6. Mined gold (silver) is produced with the use of mercury;

7. 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；

7. Not abiding by legal requirements of environmental protection and sustainable development, and mining gold (silver) in world heritage sites or domestic ecological nature reserves;

8. 存在以上 7 种事项可能性较高的情况。

8. There are cases where the above seven matters are of high possibility.

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 due diligence results draw the following conclusions, it is needed to suspend the smelting of mineral gold (silver) and regenerated gold (silver) immediately until suppliers provide additional data or information to prove that the following matters will not happen within 6 months. If relevant evidences are not provided within 6 months, it is necessary to stop the deal immediately and report it to 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 extensive human rights violations related to the extraction, transportation or trade of mineral gold (silver) and regenerated gold (silver), including the most seriously child labor employing, cruel torture, inhuman and degrading treatment, extensive sex violence, 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. Direct or indirect supports may be provided to illegal non-governmental armed organizations;

3. 可能存在通过欺诈掩盖矿产金（银）、再生金（银）的原产地；

3. The origin of mineral gold (silver) and regenerated gold (silver) may be concealed by cheating;

4. 可能存在洗钱或恐怖主义融资；

4. There may be money laundering or terrorist financing;

5. 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；

5. There may be illegal mining of small mines with incomplete domestic procedures and manual gold (silver)

mining;

6.可能开采黄金（白银）利用汞生产而得；

6. Mined gold (silver) may be produced with the use of mercury;

7.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；

7. There is the possibility of not abiding by legal requirements of environmental protection and sustainable development, and mining gold (silver) in world heritage sites or domestic ecological nature reserves;

8.可能存在以上 7 种事项可能性较高的情况。

8. There may be cases where the above seven matters are of high possibility.

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）、原料金（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至有关人员：

Article 7If the content of supply chain due diligence is not fully satisfied and the evaluated supplier actively cooperates, with the supply chain due diligence results reaching the following conclusions, the smelting of gold (silver) and regenerated gold (silver) can be continued, and the supplier is

required to provide additional data or information to prove that the following matters will not happen within 6 months. If relevant evidences are not provided within 6 months, it is necessary to stop the deal immediately and report it to relevant personnel:

1.并未完成供应链尽职调查全部内容；

1. All contents of supply chain due diligence are not 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 supports are 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. The origin of mineral gold (silver) and regenerated gold (silver) is misled by bribery or non-cheating reasons.

4.未向政府缴纳应缴税费。

4. The tax payable is not paid to the government.

第三章风险减缓策略具体步骤

Chapter III SpecificSteps 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 8Ifresultsof supply chain due diligence conform to

what the Article 5 states, the Risk Compliance Officers shall immediately organize relevant compliance officers to convene a special meeting, notifying the termination of contract with the supplier. Moreover, relevant compliance officers are required to carry out it immediately and formulate a written document for reporting it to the Compliance Director. After approval, it needs to be reported to relevant government departments.

第九条若供应链尽职调查结果符合第六条款所述，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 9If results of supply chain due diligence conform to what the Article 6 states, the Risk Compliance Officer shall immediately organize relevant compliance officers to convene a special meeting, notifying that it is needed to suspend the use of mineral gold (silver) and regenerated gold (silver) supplied by the supplier until the supplier provides additional data or information that can be used for proving 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. Provide government documents to prove that there is no systematic or extensive human right violations related to the extraction, transportation or trade of mineral gold (silver) and

regenerated gold (silver), such as a legitimate proof issued by the relevant public security or commerce department of location of the supplier;

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 the documentary evidence to prove that direct or indirect supports are not provided to the illegal armed organizations;

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. Provide the documentary evidence to prove that the origin of mineral gold (silver) and regenerated gold (silver) is not concealed by cheating, such as the Certificate 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 the documentary evidence to prove 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 the Qualification Certificate of domestic small mines;

6. 提供能够证明开采黄金（白银）不是利用汞生产而得资料；

6. Provide evidence to prove that the mined gold (silver) is not produced by the use of mercury;

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；

7. Provide relevant guidelines, policies and system documents of environment and sustainable development and pass the environment impact assessment report of 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 officers are responsible for collecting the above additional data or information and reporting the progress to the Risk Compliance Officer on time. If relevant evidences are not provided within 6 months, it is needed to implement what states in 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 10If results of supply chain due diligence conform to what the Article 7 states, the Risk Compliance Officer shall immediately organize relevant compliance officers to convene a special meeting, notifying that the use of mineral gold (silver) and regenerated gold (silver) supplied by the supplier can be continued until the supplier provides additional data or

information that can be used for proving within 6 months:

1. 配合完成该供应链尽职调查的内容；

1. Be cooperative 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. Provide the documentary evidence to prove that direct or indirect supports are not provided to the 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. Provide the documentary evidence to prove that the origin of mineral gold (silver) and regenerated gold (silver) is not misled by bribery or non-cheating reasons, 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. Provide the documentary evidence to prove that the tax payable is paid to the government, such as the payment receipt.

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 officers are responsible for

collecting the above additional data or information and reporting the progress to the Risk Compliance Officer on time. If relevant evidences are not provided within 6 months, it is needed to implement what states in Article 8.

第四章要求

Chapter IV 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 It is required that staff, suppliers and business partners of the Company shall comply with the above management measures and adopt necessary actions to ensure the implementation of above management measures.

第五章附则

Chapter V Supplementary Provisions

第十二条本管理办法自发布之日起实施。

Article 12 The Management Measures shall be implemented as of the date of issuance.

第十三条本管理办法审计与风控部负责解释。

Article 13 The Audit and Risk Control Department shall be responsible for the interpretation of the Management Measures.