

山东招金金银精炼有限公司
2023 年度供应链尽职管理合规报告
Shandong Zhaojin Gold and Silver Refining
Co., LTD
Supply Chain Due Diligence Management
Compliance Report 2023



2024 年 1 月 22 日
January 22, 2024



公司名称：山东招金金银精炼有限公司

位置：山东省招远市金晖路 289 号

年终报告：2023 年度供应链尽职管理合规报告

报告日期：2024 年 1 月 22 日

报告负责人：孙晓辉 原料事业部副总经理 ylyb8166838@163.com

Company name: Shandong Zhaojin Gold and Silver Refining Co., LTD

Location: No. 289 Jinhui Road, Zhaoyuan City, Shandong Province

Annual Report: 2023 Supply Chain Due Diligence Management Compliance Report

Date of report: 22 January 2024

Responsible person: Sun Xiaohui, Deputy General Manager of Raw Materials

Department ylyb8166838@163.com

第一部分 公司概况

Part 1: company profile

山东招金金银精炼有限公司位于以盛产黄金而闻名于世的“中国金都”——山东招远，是山东招金集团有限公司的控股子公司。公司成立于 2001 年 10 月，拥有注册资本 1.5 亿元和数家投资企业，山东招金集团有限公司持股 80.5%，深圳市招金金属网络交易有限公司持股 19.5%。公司先后成为上海黄金交易所、上海期货交易所、伦敦金



银市场协会可提供标准金锭、银锭合格精炼企业，是一家集黄金、白银收购、精炼、加工、检测、销售及回购等于一体的专业、大型现代化贵金属深加工企业。

Located in Zhaoyuan, Shandong Province, a famous place for gold, Shandong Zhaojin Gold & Silver Refinery Co., Ltd. is a holding subsidiary of Shandong Zhaojin Group Co., Ltd. The Company was established in October 2001, with a registered capital of RMB 150 million and several invested enterprises. 80.5% of its shares are held by Shandong Zhaojin Group Co., Ltd. and 19.5% are held by Shenzhen Zhaojin Metal Exchange Online Co., Ltd. The Company has successively become a qualified refining enterprise that can provide standard gold ingots and silver ingots for Shanghai Gold Exchange, Shanghai Futures Exchange, and London Bullion Market Association. The Company is a professional, large-scale, and modern precious metal deep processing enterprise integrating gold and silver acquisition, refining, processing, testing, sales, and buyback.

公司拥有职工 1400 余人，其中黄金、白银供应链相关人员 180 余人。多年来，公司致力于壮大黄金产业实力，实现了黄金精炼、贵金属深加工、终端销售三大产业合力共进。黄金精炼采用国际先进的黄金精炼技术——瑞典波立登精炼工艺及自动化控制技术，主要工艺流程分为：粉化、氯浸、还原、铸锭以及废液处理五步，年可精炼标准黄金 200 吨，精炼电解白银 1000 吨，精炼黄金提纯度达到了 99.999%，白银 99.998%。

The Company has 1,400 employees, including more than 180 people



related to the gold and silver supply chain. Over the years, the Company is committed to growing its strength in the gold industry and taking combined efforts in three industries, including gold refining, precious metal deep processing, and terminal sales. For gold refining, we used the international advanced gold refining technology - Sweden Boliden refining process and automation and control technology. The main process is divided into five steps, including pulverization, chlorination-leaching, reduction, ingot casting, and waste liquid treatment. The annual capacity can reach 200 tons of refined standard gold and 1,000 tons of refined electrolytic silver. The purity can reach 99.999% for refined gold and 99.998% for refined silver.

金银原料规格：矿产金、回收金、矿产银、回收银。

Specifications of raw gold and silver: mineral gold, recycled gold, mineral silver, and recycled silver.

金银成品规格：1 公斤金锭、3 公斤金锭、12.5 公斤金锭、15 公斤银锭、30 公斤银锭。

Specifications of finished gold and silver products: 1kg gold ingot, 3kg gold ingot, 12.5kg gold ingot, 15kg silver ingot, and 30kg silver ingot.

2023 年全国 500 强品牌价值排行榜中，“招金”品牌价值 868.15 亿元，总排名第 96 位，位列山东省第 7 位，烟台市第 1 位，居全国冶金行业第一位。公司自成立以来，连年被上海黄金交易所评为“可提供标准金锭企业先进单位”，连续十年位列上海黄金交易所的交仓量排名前三。



In the national Top 500 brand value list in 2023, the brand value of "Zhaojin" is 86.815 billion yuan, ranking 96th in total, ranking 7th in Shandong Province, 1st in Yantai City, and first in the national metallurgical industry. Since its establishment, the company has been rated as "Advanced unit that can provide standard gold ingot enterprises" by Shanghai Gold Exchange for several years, and has ranked among the top three in terms of delivery volume of Shanghai Gold Exchange for ten consecutive years.

山东招金金银精炼有限公司必须遵守中国上市公司内部控制条例《企业内部控制基本规范》和《支持指南》，并完成内部控制的自评估和报告。《企业内部控制基本规范》和《支持指南》对采购控制做出了特别规定，即企业需建立科学的供应商评估体系，以规范化合格供应商清单，并对合格供应商进行全面评估。

Shandong

公司主要原料来源为集团内各大矿山自产金、银，全国范围的冶炼企业、终端首饰加工业以及环保回收企业或者个人供应商。

The company's main raw materials are self-produced gold and silver from major mines within the Group, smelting enterprises nationwide, terminal jewelry processing industry, environmental protection recycling enterprises or individual suppliers.

第二部分 合规情况概述

Part 2: overview of compliance

公司对所有供应商均需要进行尽职供应链调查，要求并确保所有供应商提供的原料来源合法、合规。



The company is required to conduct due diligence supply chain investigations on all suppliers, requiring and ensuring that the raw materials provided by all suppliers are legal and compliant.

第一步 建立强大的公司管理体系

合规声明与要求：

我公司充分遵守第 1 步骤：建立强大的公司管理体系。

The first step is to establish a strong corporate management system

Compliance Statement and Requirements:

Our company fully complies with Step 1: Establishing a strong corporate management system.

公司严格遵守 LBMA 黄金、白银责任指南第一步“建立强大的公司管理体系”的要求，已经建立了强大的管理体系，确保供应链尽职调查工作全面落地。

The company strictly complies with the requirements of the first step of the LBMA Gold and Silver Responsible Guidance, "Establishing a strong corporate management system", and has established a strong management system to ensure that the supply chain due diligence work is fully implemented.

1. 政策方面

公司通过并出台了一项供应链尽职调查政策，该政策符合经合组织《来自受冲突影响和高风险地区矿石负责任供应链尽职调查指南》附件 II 要求并扩展至不利 ESG 因素的黄金供应链政策，该政策在官网上进行公布。针对 2022 年审计发现问题进行了整改，增加“由于



政府和对 EITI 的支持而应缴纳的税费和特许权使用费”并增加劳动者保护相关社会责任行为的要求和声明及劳工权益保护政策。

1. Policy

The company has adopted and developed a supply chain due diligence policy that complies with Annex II of the OECD Guidelines for Responsible Supply Chain Due Diligence for Ores from Conflict-affected and High-risk Areas and extends to the Gold Supply Chain Policy on adverse ESG factors, which is published on its website. In response to the problems identified in the 2022 auditing, the Government added "taxes and royalties payable due to government and support to EITI" and added requirements and statements on social responsibility behavior related to worker protection and labor rights protection policies.

政策要求公司及其供应商严格遵守国家关于职工权利、环境保护、可持续发展、公平交易等各项法律法规，积极参与供应链尽职调查工作，确保矿产和再生原料来源符合 LBMA 尽职调查管理要求，并作出承诺，拒绝来自不遵守环境和可持续发展法律要求、侵犯人权、冲突地区、贿赂、洗钱、恐怖主义融资、助长冲突、非法开采、世界遗产遗址、采用汞开采等高风险地区的黄金、白银。

The policy requires the company and its suppliers to strictly comply with the national laws and regulations on employee rights, environmental protection, sustainable development, fair trading and other laws and regulations, actively participate in the supply chain due diligence work, ensure that the source of minerals and recycled raw materials comply with the LBMA due diligence management requirements, and make



commitments. Reject gold and silver from high-risk areas such as non-compliance with environmental and sustainable development laws, human rights violations, conflict zones, bribery, money laundering, terrorist financing, fuelling conflict, illegal mining, World Heritage sites, and mercury mining.

公司更新并正式发布《山东招金金银精炼有限公司负责任黄金、白银供应链尽职调查管理政策》（以下简称‘负责任黄金、白银供应链尽职调查管理政策’），该政策与 2017 年《经济合作与发展组织受冲突影响和高风险地区矿产可靠供应链尽职调查指南》附件二规定的模式一致。该政策规定我们有责任开展基于风险的尽职调查、筛选和监控交易以及现行治理结构。

The Company updated and officially issued the Responsible Gold and Silver Supply Chain Due Diligence Management Policy of Shandong Zhaojin Gold and Silver Refining Co., LTD. (hereinafter referred to as the "Reliable Gold and Silver Supply Chain Due Diligence Management Policy"), The policy is consistent with the model set out in Annex II of the 2017 OECD Due Diligence Guidance on Reliable Supply Chains for Minerals in Conflict-affected and High-risk Areas. This policy requires our responsibility to conduct risk-based due diligence, screen and monitor transactions, and the governance structure in place.

根据黄金供应链第九版、白银第一版修订了《负责任黄金、白银供应链尽职调查管理政策》，并于 2022 年 4 月 1 日发布。修订后的政策于 2022 年 4 月 1 日生效。与以往认证体系有所不同的是，修改增加了供应商关于环境和可持续发展责任方面的要求，并在公司公告



和采购声明以及标准合同中体现。2020 年 10 月 15 日公司通过 SGS 现场审核并获取了 ISO 14021: 2016 可循环黄金证书，主要目的是丰富公司绿色产品品类，向低碳环保产品延伸。

The company revised the Responsible Gold and Silver Supply Chain Due Diligence Management Policy based on the ninth edition of the Gold Supply Chain and the first edition of the Silver Supply Chain and make it published on April 1, 2022. The revised policy will take effect on April 1, 2022. Different from the previous certification system, the amendment adds requirements for suppliers' environmental and sustainability responsibilities, which are reflected in company announcements and procurement statements, as well as standard contracts. On October 15, 2020, the company passed the on-site audit of SGS and obtained the ISO 14021:2016 recyclable gold certificate. The main purpose is to enrich the company's green product categories and extend to low-carbon environmental protection products.

2. 管理架构

公司已经建立了内部管理制度，按照出台的政策对管理、作用和职责、内部审计、沟通进行界定、并开展高级管理层评审。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，2023 年 1-10 月份王建军担任公司董事及总经理，公司授权的高级管理者，自 2023 年 11 月开始由钱虎担任公司董事及总经理，为公司授权的高级管理者。

2. Management structure



The Company has established an internal management system, defined management, roles and responsibilities, internal audit, communication, and conducted senior management reviews in accordance with the issued policy. The board of directors is composed of directors selected by the shareholders as the decision-making body of the company and responsible for the company's operation and management. Wang Leyi is the chairman of the company, 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 and the senior manager authorized by the company from January to October 2023. Since November 2023, Qian Hu has served as the director and general manager of the Company and is an authorized senior manager of the company.

根据《可靠黄金、白银供应链尽职调查管理政策》建立内部管理体系，明确治理、角色和职责、沟通和高级管理人员评审。公司于 2020 年 7 月调整了组织架构，包括：成立了以总经理为组长，分管副总为副组长的管理小组，成员分别为生产中心、精炼车间、检测中心、财务部、交易中心、银行事业部以及行政部部门负责人。机构任命王晓宁副总经理为合规总监、孙晓辉经理为合规风险官，负责合规管理、风险控制和法律事务。王晓宁副总经理管理原料金、银业务 17 年之久，每年都全程参加原料金、银审计，并且多次参加上交所组织的反洗钱知识讲座以及由中国五矿商务部组织的供应链调查讨论会议，具有丰富的管理知识和经验。孙晓辉经理从事原料金、银业务采购及销售管理业务 11 年，自我公司开始审核 LBMA 开始一直都是全程参与，对审计的所有事项均可以做到充分了解并知晓，是一位合



格的合规风险官。

Establish an internal management system in accordance with the Reliable Gold and Silver Supply Chain Due Diligence Management Policy, clarifying governance, roles and responsibilities, communication and senior management review. In July 2020, the company adjusted its organizational structure, including the establishment of a management team with the general manager as the leader and the deputy general manager as the deputy leader. The members are the heads of the production center, the refining workshop, the testing center, the finance department, the trading center, the banking department and the administration department. The agency appointed Deputy General Manager Wang Xiaoning as Compliance Director and Manager Sun Xiaohui as compliance Risk Officer, responsible for compliance management, risk control and legal affairs. Deputy General Manager Wang Xiaoning has been managing raw material gold and silver business for 17 years. He has participated in the audit of raw material gold and silver every year, and participated in anti-money laundering knowledge lectures organized by the Shanghai Stock Exchange and supply chain investigation and discussion meetings organized by the Ministry of Commerce of China Minmetals for many times, which has rich management knowledge and experience. Manager Sun Xiaohui has been engaged in the procurement and sales management of raw material gold and silver business for 11 years. He has been involved in the whole process of LBMA audit since the beginning of my company, and can fully



understand and know all audit matters. He is a qualified compliance risk officer.

2.1 规章制度方面

公司根据《LBMA 负责任的黄金第九版（白银第一版）指南》制订了《供应链尽职调查规则》《供应链尽职调查政策》《供应链风险减缓管理办法》，主要明确供应链尽职调查董事会及合规管理组织架构、职责、高风险地区定义，制定高风险供应链评估标准、调查处理程序、交易监控、文件保存等内容。上述制度通过总经理办公会审批后以红头文的形式下发，作为文控处理，每年根据实际情况进行修订。

2.1 Rules and regulations

The company has formulated the Supply Chain Due Diligence Rules, Supply Chain Due Diligence Policy and Supply Chain Risk Mitigation Management Measures in accordance with the LBMA Responsible Gold 9th Edition (Silver 1st Edition) Guidance, mainly clarifying the organizational structure, responsibilities and definition of high-risk areas of the supply chain due diligence board and compliance management. Develop high risk supply chain assessment standards, investigation and processing procedures, transaction monitoring, document preservation, etc. After the approval of the general manager's office meeting, the above system is issued in the form of a red letter, which is processed as a document control and revised annually according to the actual situation.

2.2 职责与权限

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，2023 年 1-10 月份王建军担任公司董事及总经理，公司授权的高级管理者，自 2023 年 11 月开始由钱虎担任公司董事及总经理，为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。

2.2 Responsibilities and Authority

The board of directors is composed of directors selected by the shareholders as the decision-making body of the company and responsible for the company's operation and management. Wang Leyi is the chairman of the company, 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 and the senior manager authorized by the company from January to October 2023. Since November 2023, Qian Hu has served as the director and general manager of the company. As a senior manager authorized by the company, he is responsible for examining whether to cooperate with high-risk suppliers and reviewing suppliers after signing contracts.

公司设置合规总监、合规风险官、合规专员。

The company sets up compliance director, compliance risk officer and compliance specialist.

合规总监由公司分管副总经理王晓宁担任，负责公司供应链尽职调查工作，建立健全供应链尽职调查管理体系，监督供应链尽职调查流程，协调处理供应链尽职调查中的异常情况，审批合规报告。

The Compliance Director is Wang Xiaoning, deputy general manager of the company, who is responsible for the company's supply



chain due diligence work, the establishment and improvement of the supply chain due diligence management system, the supervision of the supply chain due diligence process, the coordination and handling of abnormal situations in the supply chain due diligence, and the approval of compliance reports.

合规风险官设在原料事业部，由孙晓辉原料事业部副总经理担任，负责制定并更新供应链尽职调查政策、制度，负责制定高风险供应链评判标准和执行供应链尽职调查措施，指导、协调、报告公司风险评估、应对和实施等情况，监督、检查各部门的落实情况并考核，汇报供应链尽职调查中的异常情况，组织培训等工作，并有足够的资源和技能来支持和检测尽职调查流程的执行。

The Compliance Risk Officer is in the Raw Materials Department and is headed by Sun Xiaohui, deputy general manager of the Raw Materials Department. He is responsible for formulating and updating supply chain due diligence policies and systems, formulating high risk supply chain evaluation standards and implementing supply chain due diligence measures, guiding, coordinating and reporting the company's risk assessment, response and implementation, supervising and checking the implementation of various departments and assessing them. Report supply chain due diligence anomalies, organize training, etc., and have sufficient resources and skills to support and monitor the execution of due diligence process.

合规专员由原料一部、原料二部、原料三部业务和业务内勤人员担任，负责严格执行供应链尽职调查措施和高风险供应链评判标准，



收集并保存足够的供应链证明文件，建立供应商尽职调查档案，并定期对重要供应商进行现场调查。

The Compliance specialist is composed of business and internal staff of Raw Materials Department 1, Raw Materials Department 2, and Raw Materials Department 3. The Compliance Specialist is responsible for strictly implementing supply chain due diligence measures and high-risk supply chain evaluation standards, collecting and keeping sufficient supply chain certification documents, establishing supplier due diligence files, and conducting regular on-site investigations of important suppliers.

3. 强有力的内部追溯体系

公司建立了一套供应链可追溯体系，收集和维护每一批产品的供应链信息，为每一批产品分配唯一独立编号。

3. Strong internal traceability system

The company has established a set of supply chain traceability systems to collect and maintain the supply chain information of each batch of products and assign a unique independent number to each batch of products.

3.1 供应链可追溯体系

所有的供应商都会被进行资信调查，资信调查通过后签订合同以及供应商社会承诺书，承诺原料合法，符合 LBMA 尽职调查政策；为了保证供应商提供的原料合法合规，部门制定大客户管理制度，对客户现场拜访调查进行要求，确保客户运行合规。原料金、银进入公司后，由财务人员、车间人员将黄金、白银进行处理、编号，确保此货品在入库、取样、化验、投料、生产各个环节都能够得以追溯，成品



金、银锭以及出库均有记录，接收人员均能可追溯；公司所有原料供应商均签订合同，合同约定了开户名、经办人、打款账号等客户信息，定价结算货款均采用网银转账方式实现，确保交易账款的可追溯性；

3.1 Supply chain traceability system

All suppliers will be subjected to credit investigation, and after the credit investigation is passed, the contract and supplier social commitment letter will be signed, promising that the raw materials are legal and in line with the LBMA due diligence policy; In order to ensure that the raw materials provided by the supplier are legal and compliant, the department develops a key account management system and requires on-site visits and investigations of customers to ensure that the customer's operation is compliant. After the raw gold and silver enter the company, the financial personnel and workshop personnel will process and number the gold and silver to ensure that the warehousing, sampling, testing, feeding and production of the goods can be traced. The finished gold and silver bullion and the delivery of the goods are recorded, and the receiving personnel can be traced. All raw material suppliers of the company have signed contracts, which specify customer information such as account opening name, manager, payment account number, etc. The pricing and settlement of goods are implemented by online bank transfer to ensure the traceability of transaction accounts.

公司为了保障供应链追溯系统的充分记录，以证明已遵循适当及持续的尽职调查，公司规定所有单据至少保存 5 年以上，超出 5 年保存期限的需提交申请批示完成后方可集中销毁。



In order to ensure adequate records in the supply chain traceability system to prove that proper and continuous due diligence has been followed, the Company requires that all documents be kept for at least 5 years, and those that exceed the 5-year storage period shall be submitted for approval before they can be destroyed in a centralized manner.

3.2 维护资料

在业务开展前身份证、身份验证资料、营业执照、资质验证资料、供应商尽职调查表、每一批次的验收单、化验单、结算单等相关记录保存 5 年以上。

3.2 Maintenance Documents

Before the business is carried out, the relevant records such as ID card, identity verification information, business license, qualification verification information, supplier due diligence questionnaire, each batch of acceptance sheet, laboratory test sheet, and settlement sheet shall be kept for more than 5 years.

3.3 培训

公司每年将供应链尽职调查管理培训纳入公司年度培训计划当中，组织公司重点岗位以及合规员对供应链尽职调查管理的要求、内容以及 LBMA 负责任的黄金、白银指南进行培训。

3.3 Training

The company includes supply chain due diligence management training into the company's annual training plan every year and organizes key positions and compliance officers to train them on the requirements and contents of supply chain due diligence management and LBMA's



Responsible Gold and Silver Guidance.

2023 年度开展专题培训一次，参与人员包括原料事业部、银行事业部、财务部、检测中心、精炼车间负责人及合规管理员，对 LBMA 尽职管理要求及公司尽职管理政策、制度、流程进行了详细讲解，对举报手段方式进行了告知，重点针对《LBMA 负责任的黄金指南（第九版）》进行培训，对环境保护和可持续发展方面及强迫劳动方面进行了重点关注和客户的宣讲，确保供应链尽职调查管理工作落到实处。

A special training was held in 2023. The participants include the principals of raw materials Department, Banking Department, finance Department, testing center, refining workshop and compliance administrator, who will explain in detail the due diligence management requirements of LBMA and the company's due diligence management policies, systems and processes, and inform the reporting methods. The training focused on the LBMA Gold Guidance (9th Edition), focused on environmental protection and sustainability aspects and forced labor aspects, and informed customers to ensure that supply chain due diligence management is implemented.

3.4 合规专员

公司指定部门风控专人为合规专员，负责有关供应链尽职调查管理的所有事项。特别是，对供应链尽职调查进行审核，并评估尽职调查是否充分，必要时收集额外文件或信息。确保在高风险供应链或交易内实施相应从事。负责有关责任供应链的员工培训，编制并更新供应链政策，并向高级管理人员提供用于履行职责的适当信息。



3.4 Compliance Specialist

The company designates departmental risk control personnel as compliance specialists, who are responsible for all matters related to supply chain due diligence management. In particular, conduct audits of supply chain due diligence and assess the adequacy of due diligence, gathering additional documentation or information if necessary. Ensure appropriate activities are implemented within high-risk supply chains or transactions. Responsible for staff training related to the responsible supply chain, preparing and updating supply chain policies, and providing senior management with appropriate information to perform their duties.

3.5 通过银行渠道付款

公司在支付货款时，由业务部门发起资金支付审批流程，通过集团财务公司基本户进行网上付款，公司财务人员打印银行回单作为凭证附件保留。

3.5 Payment through bank channels

When the company makes the payment for goods, the business department initiates the approval process of fund payment, makes the online payment through the basic account of the group's financial company, and the company's financial staff prints the bank receipt as the attachment of the voucher.

4. 强化合作，协助黄金、白银供应交易方建立尽职调查能力

公司鼓励与供应商建立基于信任和互认的长期关系，特别是遵守经合组织《来自受冲突影响和高风险地区矿石负责任供应链尽职调查指南》附件 II 并扩展至环境、可持续性责任的供应商及不利 ESG 因



素的黄金供应链政策。

4. Strengthen cooperation and assist gold and silver supply traders to establish due diligence capabilities

The Company encourages long-term relationships based on trust and mutual recognition with its suppliers, in particular the gold supply chain policy that complies with Annex II of the OECD Due Diligence Guidelines for Responsible Supply Chains for Ores from Conflict-affected and High-risk Areas and extends to environmentally and sustainably responsible suppliers and adverse ESG factors.

公司所有供应商都签署《供应商社会承诺书》，承诺黄金来源合法合规，拒绝来自 LBMA 规定的高风险区域。所有矿山类型的供应商需提供采矿许可证，并出具能够证明其遵守环境保护及可持续发展相关规定的证明资料，如绿色工厂认证资料等，支持实施采掘业透明度行动计划原则（如《负责任黄金指南》第 1、4 步所述），对于公司销售的大客户要备案其下游客户的发票，规避套票风险。支持冶炼厂披露报告期内为购买矿产资源向国有企业支付的所有首笔交易款。

All of the company's suppliers have signed a "Supplier Social Commitment", promising that the source of gold is legal and compliant, and refuse to come from high-risk areas specified by the LBMA. Suppliers of all mine types are required to provide mining licenses and provide evidence of compliance with environmental protection and sustainability requirements, such as green factory certification, support the implementation of the Extractive Industries Transparency Action Plan principles (as described in steps 1 and 4 of the Responsible Gold



Guidance), and record invoices from downstream customers for major accounts sold by the company. Avoid the risk of arbitrage. Support smelters to disclose all first transaction payments made to state-owned enterprises for the purchase of mineral resources during the reporting period.

5. 建立机密申诉机制

公司利用官网平台，公布电话和邮箱，允许员工和外部利益相关者表达对供应链或任何新的已识别风险的担忧，并在整个申诉过程中保护员工隐私，对举报人信息保密，杜绝任何行为的打击报复。

5. Establish a confidential appeal mechanism

The company uses the official website platform, publishes phone numbers and email addresses, allows employees and external stakeholders to express concerns about the supply chain or any new identified risks, and protects employee privacy throughout the complaint process, keeping whistleblower information confidential and preventing any retaliation.

政策的修订版和发布通知已上传至公司网站，通过该系统，允许员工及外部利益相关者均可查看该等政策。员工及外部人员均可在公司网站的公告板上查看《可靠黄金、白银供应链尽职调查管理政策》。招金精炼还在整个公司范围建立了一项沟通机制，促进广泛参与风险管理和风险识别。员工及外部利益相关人员可通过服务热线、电子邮件或邮箱发表他们关于黄金、白银供应链的任何意见或告知任何新发现的风险。举报电话：0535-8166828，0535-8166838，邮箱：ylyb8166838@163.com，公司网址：www.zhaojin.cn。



A revised version of the policy and a notice of publication have been uploaded to the company's website, through which the policy is accessible to both employees and external stakeholders. Employees and outsiders can view the "Responsible Gold and Silver Supply Chain Due Diligence Management Policy" on a bulletin board on the company's website. Zhaojin has also established a company-wide communication mechanism to facilitate broad participation in risk management and risk identification. Employees and external stakeholders can use the helpline, email or post to express any comments they have about the gold and silver supply chain or to inform them of any newly discovered risks. Tel: 0535-8166828, 0535-8166838, Email: ylyb8166838@163.com, website: www.zhaojin.cn.

允许匿名举报！按照国家有关法律法规保护举报者。2023 年度公司未收到员工及外部人员的意见或投诉。

Anonymous reporting is allowed! Protect whistleblowers in accordance with relevant state laws and regulations. In 2023, the Company received no comments or complaints from employees and external personnel.

第二步 供应链风险的识别与评估

合规声明与要求：

我公司充分遵守第 2 步骤：对供应链中的风险进行识别和评估，未发现不符合项风险。

The second step is the identification and evaluation of supply chain risk



Compliance Statement and Requirements:

Our company fully complies with Step 2: identifying and assessing risks in the supply chain.

No nonconformance risk was found.

公司严格遵守 LBMA 黄金、白银责任指南第 2 步“供应链风险的识别与评估”的要求，制定了高风险供应链的判定标准，并对识别出来的风险规定了处理程序，充分对供应链中的风险进行识别和评估。截止到目前，未发现高风险供应链。

The company strictly complies with the requirements of Step 2 of the LBMA Gold and Silver Guidance, "Identification and Assessment of Supply chain risks", formulates the judgment criteria for high-risk supply chains, and stipulates the treatment procedures for identified risks, so as to fully identify and evaluate the risks in the supply chain. Up to now, no high-risk supply chain has been found.

1. 识别供应链风险

根据经合组织《来自受冲突影响和高风险地区矿石负责任供应链尽职调查指南》附件 II 并扩展至环境和可持续性责任及不利 ESG 因素的黄金、白银供应链政策，招金精炼公司识别相关风险，密切关注来自来自不遵守环境和可持续发展法律要求、侵犯人权、武装冲突、非法开采、开采利用汞以及源于世界遗产遗址和联合国等世界性机构制裁清单等地区的原料，尤其是用于贿赂、洗钱、恐怖主义融资等行为的黄金、白银。公司为每个供应商建立供应商档案，根据公司的风险状况进行了调查，在与其签合同之前完成供应商档案的建立工作，并对其进行风险评级。



1. Identify supply chain risks

In line with Annex II of the OECD Guidelines on Responsible Supply Chain Due Diligence for Minerals from Conflict-Affected and High-risk Areas and extending to the Gold and silver supply Chain Policy on environmental and sustainability responsibility and adverse ESG factors, Pay close attention to raw materials from areas such as non-compliance with environmental and sustainable development laws, human rights violations, armed conflicts, illegal mining, exploitation and use of mercury, as well as from World Heritage sites and the sanctions lists of world bodies such as the United Nations, especially gold and silver used in bribery, money laundering and terrorist financing. The company creates a supplier profile for each supplier, surveys the risk profile of the company, completes the establishment of the supplier profile before signing a contract with it, and grades its risk.

2. 评估供应链风险

2. Assess supply chain risks

2.1 供应链调查

公司通过以下措施对供应链进行尽职调查：

(1) 资质验证。招金精炼公司对于所有供应商均进行供应链的尽职管理调查，在进行合作前要求合作方提供相应的资质证明文件，法人客户提供营业执照，个人客户提供身份证复印件，矿山客户还需要提供采矿许可证，特殊客户需要环评认证以及关注矿工佩戴劳保、健康安全交易、职业病体检。

2.1 Supply chain Survey



The company conducts due diligence on the supply chain by:

(1) Qualification verification. Shandong Zhaojin Gold and Silver Refining Co., LTD conducts supply chain due diligence management survey for all suppliers, and requires the partners to provide the corresponding qualification certification documents before the cooperation, the legal customers to provide the business license, the individual customers to provide the copy of the ID card, and the mining customers to provide the mining license. Special customers need environmental assessment certification and pay attention to miners wearing labor insurance, health and safety trading, occupational health examination.

(2) 建立供应商档案。对供应商基本情况、股东信息、提供原料类型及产地、计划精炼贵金属类型、与其供应商结算方式、其供应商概况等信息进行详细调查,并尽可能的将供应链调查向供应商的上游延伸,最终确定其风险等级,对于涉及高风险标准的供应商终止合作。

(2) Establish supplier files. Conduct detailed investigation on the basic information of suppliers, shareholders' information, types and places of raw materials to be provided, types of precious metals to be refined, settlement methods with suppliers, profiles of suppliers and other information, and extend the supply chain investigation to the upstream of suppliers as far as possible to determine their risk levels, and terminate cooperation with suppliers involved in high-risk standards.

(3) 建立来料登记簿。对供应商当批次来料的日期、重量、原



料来源、主要上游供应商进行调查登记，判断其来料风险等级。

(3) Establish the incoming materials register. Investigate and register the date, weight, source of raw materials and main upstream suppliers of incoming materials, and judge the risk level of incoming materials.

(4) 建立供应商年度调研报告工作流程。对除银行之外的全年黄金、白银来料量进行专项尽职调查，形成供应商年度调查报告，内容包括：供应商概况、资质信息、来料类型及所占比重、上游供应商概况及名单、原料产地及品种、是否存在国外黄金等。

(4) Establish supplier annual research report workflow. Conduct special due diligence on the annual incoming gold and silver materials except banks, and form an annual supplier survey report, which includes: supplier profile, qualification information, type and proportion of incoming materials, upstream supplier profile and list, origin and variety of raw materials, whether there is foreign gold, etc.

(5) 建立客户专项调研报告工作流程。在走访客户时，对原料来源进行追溯，向供应商传达招金精炼公司尽职管理政策，并要求其在政策上签字。

(5) Establish the workflow of customer special research reports. When visiting customers, trace the source of raw materials, communicate Zhaojin Refining Company's due diligence management policy to suppliers, and ask them to sign on the policy.

(6) 对产品的去向进行尽职调查。针对黄金、白银销售业务，对一次性购买黄金重量超过 10 公斤或累计购买超过 10 公斤的客户，一次性购买白银重量超过 100 公斤或累计购买超过 100 公斤的客户，



进行产品去向尽职调查工作。风险评判细则涵盖了位置风险、供应链风险、原料风险三个维度，位置风险可参考中国政府认可的国际制裁名单、多德—弗兰克法案第 1502 条、欧盟 CAHRA 名单、海德堡晴雨表、脆弱国家指数或类似的指数、联合国人权事务高级专员办事处或同等机构、金融行动特别工作组（FATF）的报告（包括相关国家/地区报告）、关于高风险原料中心/转运中心和高洗钱风险国家/地区的可靠市场情报，填写 KYC 问卷，对涉及高风险行为的供应商终止合作。

(6) Conduct due diligence on the destination of the product. For the gold and silver sales business, the due diligence of the product destination is carried out for customers who purchase gold weighing more than 10 kg at one time or cumulative purchase of more than 10 kg, and for customers who purchase silver weighing more than 100 kg at one time or cumulative purchase of more than 100 kg. The risk assessment rules cover three dimensions: location risk, supply chain risk and raw material risk. Location risks refer to the international sanctions list approved by the Chinese government, Section 1502 of the Dodd-Frank Act, and the European Union CAHRA Lists, Heidelberg Barometer, Fragile States Index or similar index, reports from the Office of the United Nations High Commissioner for Human Rights or equivalent, Financial Action Task Force (FATF) (including relevant country reports), reliable market intelligence on high-risk raw material centres/transshipment centres and



high money laundering risk countries/regions, complete KYC questionnaires, Terminate cooperation with suppliers involved in high-risk behavior.

2.2 高风险供应链及定义

根据 LBMA 和 OECD 相关规定，结合公司实际情况，特规定公司的高风险定义及如下高风险供应链评判标准：

2.2 High-risk supply chain and definition

According to the relevant regulations of LBMA and OECD, combined with the actual situation of the company, the definition of high risk of the company and the following high risk supply chain evaluation criteria are specified:

(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 originating in, transiting or transiting areas affected by conflict or at high risk of human rights violations;

(2) 矿产金、银声称来源于一个已知储量有限、资源有限或预计产量有限的国家；

(2) The mineral's gold or silver claims to originate in a country with limited known reserves, limited resources or limited projected production;

(3) 再生金、银来源于已知的武装冲突影响、普遍暴力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 and silver originating in areas known to be at high risk of armed conflict, widespread violence and human rights violations, or where there is reason to suspect transit;

(4) 在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) The company or other known upstream company in the supply chain is located in a country where there is a high risk of money laundering, crime and corruption;

(5) 在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) Companies in the supply chain or other known upstream companies whose earnings owners are politically sensitive;

(6) 在供应链中的公司或其他已知的上游公司积极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 supply chain or other known upstream companies actively involved in high-risk commercial activities, such as arms, gambling, gambling, antiques and art, diamonds, religions and religious leaders;

(7) 再生金、银来源于国内手续不全、非法开采的小型矿山，以及开采黄金源于手工开采；

(7) Recycled gold and silver come from small mines with incomplete domestic procedures and illegal mining, and gold mining comes from manual mining;



(8) 再生金、银或再生金、银利用汞生产而得；

(8) Recycled gold or silver or recycled gold or silver produced from mercury;

(9) 不遵守环境和可持续发展法律要求，矿产金、银或再生金、银源于世界遗产遗址或国内自然生态保护区；

(9) Non-compliance with environmental and sustainable development legal requirements, mineral gold, silver or recycled gold, silver from World Heritage sites or domestic natural ecological reserves;

(10) 在公司供应链中确定没有来自 CAHRA 的生产国或过境国。

(10) Determine that there are no producing or transit countries from CAHRA in the Company's supply chain.

(11) 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。

(11) Whether the high risk is associated with any suspected OECD Annex II risks and environmental and sustainability risks in the company's supply chain.

(12) 其他高风险情况。

当上述评判标准任何一条客观存在时，则该供应链被判定为高风险供应链。部门合规专员应立即准备材料上报合规风险专员，由合规风险专员上报合规总监，由合规总监批准采取应对措施，停止交易，消除风险。

(12) Other high-risk situations.

When any of the above criteria exists objectively, the supply chain is judged to be a high-risk supply chain. The compliance specialist of the



department shall immediately prepare materials and report them to the Compliance Risk Specialist, who shall report them to the Compliance Director, who shall approve taking countermeasures to stop trading and eliminate risks.

经尽职调查，2023 年度所有供应商均为低风险，所有原料均来自低风险地区。

After due diligence, all suppliers in 2023 are low risk and all raw materials are sourced from low risk regions.

2.3 高风险类别

公司制定了《供应链风险减缓管理办法》，当供应链调查发现来自高风险区域时，停止该交易并上报合规总监审批后报政府部门；当供应链尽职调查发现可能来自高风险区域，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。

2.3 High-risk Categories

The company has formulated the Supply Chain Risk Mitigation Management Measures. When the supply chain is found to be from a high-risk area, it will stop the transaction and report to the government department after approval by the compliance director; When the supply chain due diligence finds that it may come from a high-risk area, the smelting of gold, silver, recycled gold and silver from the mineral shall be suspended immediately until the supplier provides additional data or information that proves that it is unlikely to exist within 6 months. If the



relevant evidence is not provided within 6 months, the transaction must be stopped immediately and reported to the relevant personnel.

提供的资料包括：

(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；

(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；

(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；

(4) 提供不存在洗钱或恐怖主义融资的证明文件；

(5) 提供国内小型矿山资质证明文件；

(6) 提供能够证明开采黄金、白银不是利用汞生产而得资料；

(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；

The information provided includes:

(1) provide governmental documents that demonstrate the absence of systematic or widespread human rights violations related to mineral gold, silver, recycled gold, silver extraction, transportation, or trade, such as a certificate of legality issued by the relevant public security or commercial authorities in the supplier's location;

(2) provide documentation that it does not provide direct or indirect support to illegal armed organizations;

(3) Provide documents of origin that do not conceal mineral gold, silver or recycled gold and silver through fraud, such as certificates of



origin issued by relevant government departments;

(4) Provide documentation of the absence of money laundering or terrorist financing;

(5) To provide domestic small mine qualification certification documents;

(6) Provide information that can prove that the mining of gold and silver is not produced by the use of mercury;

(7) Provide environmental and sustainable development-related policies and institutional documents and adopt environmental assessment reports of relevant departments;

2.4 交易监测

公司对所有交易情况进行监督，确保交易与供应链调查一致。

公司对供应链尽职调查进行检查，每批来料编号唯一，生产可追溯，对于所有的原料采购入库均保留完整的单据资料，对于入库的金、银精矿保存有过磅单、水份单、品位单、结算单、财务凭证等；对于入库的合质金银保存有来料验收单、品位单、结算单、财务凭证等。明确各个部门应在日常工作中收集保存的资料，由市场部、市场二部、质检中心、财务部对相关单据进行保存，并定期将相关资料送至档案室进行存档，保存期限均高于 5 年。

2.4 Transaction Monitoring

The company monitors all transactions to ensure they are consistent with supply chain investigations.

The company checks the due diligence of the supply chain, each batch of incoming materials has a unique number, and the production can



be traced back. The company keeps complete documents for all raw material purchase and warehousing, and keeps weighing sheets, moisture sheets, grade sheets, settlement sheets, financial vouchers, etc., for the gold and silver concentrates in warehousing. For the bonded gold and silver stored in the warehouse, there are incoming material inspection, grade, settlement, financial vouchers, etc. It is clear that all departments should collect and save the data in daily work, and the Marketing Department, the second Marketing Department, the Quality inspection center and the Financial Department should save the relevant documents, and send the relevant data to the archive room regularly for archiving, and the retention period is more than 5 years.

3. 向高级管理层报告风险评估

公司建立风险评估报告制度，每月合规专员对部门尽职调查工作报合规风险官。当供应链调查发现来自高风险区域，被评估为高风险供应链时，停止该交易并上报合规总监审批。

3. Report risk assessments to senior management

The company has established a risk assessment reporting system, and the compliance specialist reports the due diligence work of the department to the compliance risk officer every month. When the supply chain survey finds that it is from a high-risk area and is assessed as a high-risk supply chain, the transaction is stopped and reported to the Compliance Director for approval.

第三步 设计并实施策略来应对已识别的风险

合规声明与要求：



我公司已经充分遵守第 3 步:设计和落实管理体系应对识别的所有风险。

The third step is to design and implement strategies to address the identified risks

Compliance Statement and Requirements:

Our company has fully complied with Step 3: Designing and implementing a management system to address all risks identified.

公司严格遵守 LBMA 黄金、白银责任指南第三步“设计并实施策略来应对已识别的风险”的要求。2023 年未发现高风险供应链，因此未采取供应链风险减缓措施。

The company strictly complies with the requirements of Step 3 of the LBMA Gold & Silver Guidance, "Designing and implementing strategies to address identified risks." No high-risk supply chains were identified in 2023, so no supply chain risk mitigation measures were taken.

公司制订了《供应链风险减缓管理办法》并作为文控管理，约定了在供应商评估及日常业务开展过程中发现的违规情况的处理方式；规范了发现供应商存在高风险行为的处理步骤，明确了尽职管理各级组织、人员的责任。

The company has formulated the "Supply Chain Risk Mitigation Management Measures" as a document control management, and agreed on the way to deal with violations found in supplier evaluation and daily business development; It standardizes the handling steps for finding



high-risk behaviors of suppliers, and clarifies the responsibility of due diligence management of organizations and personnel at all levels.

疑似高风险来料后，对其进行单独登记，并告知精炼车间，对其原料单独熔炼，在整个工艺流程中不与其他客户混合，对由其原料生产的成品金银进行单独编号，并在金库中与其他成品金银分区域存放。针对涉及违反环境及可持续发展原则的来料，全部作为高风险来料，单独登记，单独熔炼，单独编号，分区域存放。

After the suspected high-risk incoming material, it is registered separately and informed the refining workshop, its raw material is smelted separately, it is not mixed with other customers during the entire process, and the finished gold and silver produced from its raw material is numbered separately and stored in the vault with other finished gold and silver. For incoming materials that violate the principles of environmental and sustainable development, all of them are regarded as high-risk incoming materials, registered separately, melted separately, numbered separately, and stored in different regions.

第四步 对供应商的尽职调查实践开展独立的第三方审计

合规声明与要求：

我公司已经充分遵守第 4 步：安排供应链尽职调查的独立第三方审计。

Step 4 Conduct an independent third-party audit of the supplier's due diligence practices

Compliance Statement and Requirements:

Our company has fully complied with Step 4: Arranging an



independent third party audit of our supply chain due diligence.

公司严格遵守 LBMA 黄金、白银责任指南第四步“对供应商的尽职调查实践开展独立的第三方审计”的要求。

招金精炼公司委托了必维认证(北京)有限公司上海分公司,按照 ISAE300 标准进行 LBMA 尽职管理审计,上一次审计时间为 2023 年 3 月,审核报告已经上传至我司官方网 <http://www.zhaojin.cn/> 上查看第三方的 2022 年度审计报告。

2022 年度审核,未产生中高风险不符合。

公司 2023 年年度报告披露日期预计为 2024 年 3 月 27 日。

(对于公司审计过程中发现的问题,均已整改完毕,问题已关闭)

The company strictly complies with the requirements of Step 4 of the LBMA Gold & Silver Guidance, "Conducting an independent third-party audit of suppliers' due diligence practices."

Shandong Zhaojin Gold and Silver Refining Co., LTD commissioned Bureau Veritas Certification (Beijing) Co., Ltd. Shanghai Branch to conduct LBMA due diligence management audit according to ISAE300 standard. The last audit was in March 2023. The audit report has been uploaded to our official website <http://www.zhaojin.cn/> to view the Y2022 audit report of the third party.

The 2022 annual audit did not produce No medium or high risk non

The disclosure date of the Company's 2023 Annual report is expected to be March 27, 2024. (For the Non-Compliance found in the audit process of the company, the corrective action has been completed



and the Non-Compliance have been closed)

第五步 供应链尽职调查年度报告

合规声明与要求:

我们公司已经充分遵守第 5 步: 有关供应链尽职调查的报告。

Step 5 Supply Chain Due Diligence Annual report

Compliance Statement and Requirements:

Our company has fully complied with Step 5: Reporting on supply chain due diligence.

公司严格遵守 LBMA 黄金、白银责任指南第五步“供应链尽职调查年度报告”的要求。

公司每年通过山东招金金银精炼有限公司网站对上一年度的现场审计情况总结及评估报告、尽职管理证书、供应链管理制度、供应链尽职调查政策进行公示。

The company strictly complies with the requirements of Step 5 of the LBMA Gold & Silver Guidance, "Supply Chain Due Diligence Annual Report".

Every year, the company publicizes the last year's on-site audit summary and evaluation report, due diligence management certificate, supply chain management system and supply chain due diligence policy through the website of Shandong Zhaojin Gold and Silver Refining Co., LTD.

第三部分 管理结论

综上所述, 在报告年度截至于 2023 年 12 月 31 日的财年内, 根据《伦敦金银市场协会 (LBMA) 负责任黄金、白银指南》的要求, 山



东招金金银精炼有限公司实施了有效的管理制度、程序、流程和实践。山东招金金银精炼有限公司致力于不断的改进提升，所有的纠正措施将在内部进行定期监测。纠正性行动计划单独传达给 LBMA 执行机构，以及《伦敦金银市场协会（LBMA）可靠黄金、白银指导原则》的管理人员。

Part 3: Management conclusion

In summary, for the fiscal year ending December 31, 2023, In accordance with the requirements of the London Bullion Market Association (LBMA) Responsible Gold and Silver Guidance, Shandong Zhaojin Gold and Silver Refining Co., LTD has implemented effective management systems, procedures, processes and practices. Shandong Zhaojin Gold & Silver Refining Co., Ltd. is committed to continuous improvement and all corrective actions will be regularly monitored internally. The corrective action plan is communicated separately to the LBMA executive and to the managers of the London Bullion Market Association (LBMA) Reliable Gold and Silver Guidance.

第四部分：其他报告批注

如果本报告用户希望就本报告向山东招金金银精炼有限公司进行任何反馈，则可以通过 ylyb8166838@163.com 联系企业相关部门。

Part 4: Other report comments

If users of this report wish to provide any feedback to Shandong Zhaojin Gold & Silver Refining Co., LTD., they may contact the relevant departments of the company via ylyb8166838@163.com.

