

 金利集团 Jinli Group	文件名称：供应链风险减缓管理办法 File Name: Supply Chain Risk Mitigation Management Measures	版本号：第三版 Version number: Third edition
内控文件编号：HNJL-GYLGLBF-202310-01 Internal control document number: HNJL-GYLGLBF-202310-01	主控部门：期货部 Main Control Department: Futures Department	
编制/校准：秦跃强/侯凌燕 Prepared/calibrated by: Qin Yueqiang/Hou Lingyan	实施日期：2023年10月10日 Implementation date: October 10, 2023	

供应链风险减缓管理办法

Supply Chain Risk Mitigation Management Measures

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，积极参与白银、黄金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）责任指南》、《伦敦金属交易所（LME）责任指南》和《OECD对来自冲突影响和高风险区域负责任的供应链进行尽职调查指南》以及中国CCCMC编制的《中国矿产供应链尽责管理指南》，特制定河南金利金铅集团有限公司供应链风险减缓管理办法。

In order to strictly abide by the state's various laws and regulations on employee rights, environmental protection, fair transactions, etc., they actively participate in the investigation of silver and gold supply chains to ensure the legitimacy of the source of raw materials. According to the "London precious Metals Market Association (LBMA) Guide", "London Metal Exchange (LME) Responsibility Guide" and "OECD to conduct due diligence guidelines for the supply chain of conflict and high-risk region responsibility", and China CCCMC preparation "Guidelines for the Management of China Mineral Supply Chain Responsibility Management", specially set up Henan Jinli

 金利集团 Jinli Group	文件名称：供应链风险减缓管理办法 File Name: Supply Chain Risk Mitigation Management Measures	版本号：第三版 Version number: Third edition
内控文件编号：HNJL-GYLGLBF-202310-01 Internal control document number: HNJL-GYLGLBF-202310-01	主控部门：期货部 Main Control Department: Futures Department	
编制/校准：秦跃强/侯凌燕 Prepared/calibrated by: Qin Yueqiang/Hou Lingyan	实施日期：2023年10月10日 Implementation date: October 10, 2023	

Gold And Lead Group Co.,Ltd. Supply Chain Risk Slowing Management Measures.

1. 范围

I. Scope

本办法适用于河南金利金铅集团有限公司(以下简称“公司”)根据供应链尽职调查政策已识别的所有风险。本办法所涉及的来源包括矿产黄金银铅锌、阳极泥、粗铅及其他原料,2018年1月1日后生产的各种形式的库存黄金、银、铅、锌。

These measures are applicable to all risks that Henan Jinli Gold And Lead Group Co.,Ltd. (hereinafter referred to as "Company") based on the supply chain investigation policy. The sources involved in these Measures include various forms of inventory gold, silver, lead, and zinc produced after January 1, 2018 after January 1, 2018.

2. 术语和定义

II. Terms and definitions

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)供应链尽责指南》、《伦敦金属交易所(LME)供应链尽责指南》、《OECD对来自冲突影响和高风险区域负责任的供应链进行尽职调查指南》、《中国矿产供应链尽责管理指南》所描述的内容。

The terms and definitions involved in these Measures use the "London precious metal market

 金利集团 Jinli Group	文件名称：供应链风险减缓管理办法 File Name: Supply Chain Risk Mitigation Management Measures	版本号：第三版 Version number: Third edition
内控文件编号：HNJL-GYLGLBF-202310-01 Internal control document number: HNJL-GYLGLBF-202310-01	主控部门：期货部 Main Control Department: Futures Department	
编制/校准：秦跃强/侯凌燕 Prepared/calibrated by: Qin Yueqiang/Hou Lingyan	实施日期：2023年10月10日 Implementation date: October 10, 2023	

association (LBMA) responsibility guide", "London Metal Exchange (LME) responsibility guide", "OECD on the supply chain of the conflict and high-risk area responsibilities, The content described by the Discipline Investigation Guidelines and the Management Guide of the Chinese Mineral Supply Chain Responsibility.

3. 风险减缓策略

III. Risk slowing strategy

3.1 所有尽职调查过程中收集的信息以及供应链风险评估内识别的实际以及潜在风险需上报合规组长，再由合规组长整理后上呈合规总监。由合规总监最终确定风险级别。

3.1 All information collected during the due diligence process and the actual and potential risks identified in the supply chain risk assessment must be reported to the compliance team leader, who will then be sorted by the compliance team leader and submitted to the compliance director. The Compliance Director will finally determine the risk level.

3.2 若供应链尽职调查结果得出以下结论，则需立即对物料进行隔离并上报至有关部门：

 金利集团 Jinli Group	文件名称：供应链风险减缓管理办法 File Name: Supply Chain Risk Mitigation Management Measures	版本号：第三版 Version number: Third edition
内控文件编号：HNJL-GYLGLBF-202310-01 Internal control document number: HNJL-GYLGLBF-202310-01	主控部门：期货部 Main Control Department: Futures Department	
编制/校准：秦跃强/侯凌燕 Prepared/calibrated by: Qin Yueqiang/Hou Lingyan	实施日期：2023年10月10日 Implementation date: October 10, 2023	

3.2 If the results of the supply chain are drawn by the following conclusions, the materials need to be isolated and reported to the relevant departments immediately:

1) 存在有关白银、黄金、铅、锌提取、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 systemic or extensive human rights violations about silver, gold, lead, zinc extraction, transportation or trade, including the most serious use of children's workers, torture, non-humane, and insulting personality treatment methods, extensive sexual violence or other serious anti-human rights forced forced forces Labor, war, anti-human crime or racial extinction;

2) 存在向非法的非政府武装组织提供直接或间接支持；

2) Provide direct or indirect support to illegal non-governmental armed organizations;

3) 存在通过欺诈掩盖白银、黄金的原产地；

3) There is a place for the origin of silver through fraud;

4) 存在洗钱或恐怖主义融资；

4) There are money laundering or terrorism financing;

 金利集团 Jinli Group	文件名称：供应链风险减缓管理办法 File Name: Supply Chain Risk Mitigation Management Measures	版本号：第三版 Version number: Third edition
内控文件编号：HNJL-GYLGLBF-202310-01 Internal control document number: HNJL-GYLGLBF-202310-01	主控部门：期货部 Main Control Department: Futures Department	
编制/校准：秦跃强/侯凌燕 Prepared/calibrated by: Qin Yueqiang/Hou Lingyan	实施日期：2023年10月10日 Implementation date: October 10, 2023	

5) 向非法的公共或私人安全部队提供直接或间接支持；

5) Provide direct or indirect support to illegal public or private security forces;

6) 贿赂或非欺诈原因而误导矿产品的原产地；

6) Misstatement of the origin of mineral products by bribery or non-fraud cause;

7) 未向政府缴纳应缴税费。

7) Taxes and fees should not be paid to the government.

3.3 符合3.2的供应商若在5个工作日之内仍未提供相关证据，则按风险减缓策略具体步骤实施。

3.3 If the supplier that meets 3.2 does not provide relevant evidence within 5 working days, it will be implemented according to the specific steps of the risk mitigation strategy.

4. 风险减缓策略具体步骤

Specific steps of risk mitigation strategy

4.1 所有来料到厂后，堆放到指定区域，插上标识牌，注明物料名称、来源地、合同号等信息。

4.1 After all the incoming materials arrive at the factory, they are stacked in the designated area, and the identification plate is inserted to indicate the name of the

 金利集团 Jinli Group	文件名称：供应链风险减缓管理办法 File Name: Supply Chain Risk Mitigation Management Measures	版本号：第三版 Version number: Third edition
内控文件编号：HNJL-GYLGLBF-202310-01 Internal control document number: HNJL-GYLGLBF-202310-01	主控部门：期货部 Main Control Department: Futures Department	
编制/校准：秦跃强/侯凌燕 Prepared/calibrated by: Qin Yueqiang/Hou Lingyan	实施日期：2023年10月10日 Implementation date: October 10, 2023	

material, the place of origin, and the contract number and other information.

4.2 若供应链尽职调查结果存在3.3条款所述情况，应对该批物料进行单独堆放，标识牌、料堆不得挪动。合规总监需立即召集相关合规专员开立专项会议，通报与该被评估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上层领导。再由公司办公室上报相关政府部门。由公司总经理签署退货通知单说明理由，以传真形式通知白银、黄金供货商。

4.2 If the results of due diligence of the silver supply chain have the conditions described in Clause 3.3, the batch of materials shall be stacked separately, and the identification plates and material piles shall not be moved. The compliance director shall immediately convene the relevant compliance specialists to open a special meeting to notify the appraised supplier to terminate the contract relationship, and at the same time require the relevant compliance specialists to implement it immediately, and form a written document to report to the upper management. The company's office will then report to relevant government departments. The general manager of the company

 金利集团 Jinli Group	文件名称：供应链风险减缓管理办法 File Name: Supply Chain Risk Mitigation Management Measures	版本号：第三版 Version number: Third edition
内控文件编号：HNJL-GYLGLBF-202310-01 Internal control document number: HNJL-GYLGLBF-202310-01	主控部门：期货部 Main Control Department: Futures Department	
编制/校准：秦跃强/侯凌燕 Prepared/calibrated by: Qin Yueqiang/Hou Lingyan	实施日期：2023年10月10日 Implementation date: October 10, 2023	

signs a return notice, explaining the reason, and informs the silver supplier by fax.

4.3若供应链尽职调查结果存在3.2条款所述,应对该批物料进行单独堆放,标识牌、料堆不得挪动,合规总监需立即召集相关合规专员开立专项会议,通报立即暂停使用该被评估供应商提供的矿产银(黄金、铅)或回收银(黄金、铅),直至其在5个工作日之内提供可供证明的额外数据或信息为止:

4.3 If there is a result of the results of the supply chain, the result of the 3.2 clause is stated in response to the batch of materials separately, the identification card and the pile must not move. The mineral silver (gold, lead, zinc) or recycling silver (gold, lead, zinc) provided by the supplier, until it provides additional data or information that can be proven within 5 working days:

1)提供证明不存在有关白银、黄金、铅、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,如被评估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 a government document that does not have the systemic or extensive human rights violations of silver, gold, lead, extraction, transportation or trade, such as silver, gold, lead, zinc extraction, transportation or trade.

 金利集团 Jinli Group	文件名称：供应链风险减缓管理办法 File Name: Supply Chain Risk Mitigation Management Measures	版本号：第三版 Version number: Third edition
内控文件编号：HNJL-GYLGLBF-202310-01 Internal control document number: HNJL-GYLGLBF-202310-01	主控部门：期货部 Main Control Department: Futures Department	
编制/校准：秦跃强/侯凌燕 Prepared/calibrated by: Qin Yueqiang/Hou Lingyan	实施日期：2023年10月10日 Implementation date: October 10, 2023	

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 documentation that does not provide direct or indirect support to illegal armed organizations;

3) 提供并未通过欺诈掩盖白银、黄金、铅、锌的原产地证明文件，如相关政府部门出具的原产地证明；

3) Provide a certificate of origin of the origin of the origin of silver, gold, lead, and zinc through fraud, such as proof 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 proof that there is no money laundering or terrorist financing.

由相关的合规专员负责收集以上所述额外数据或信息，并按时向合规组长汇报情况进展，合规组长制定监测报告上呈合规总监。若在5个工作日之内仍未提供相关证据，则需按4.2条款实施。

The relevant compliance specialist is responsible for collecting the additional data or information mentioned above and reporting the progress to the compliance team leader on time. The compliance team leader prepares a monitoring report and submits it to the compliance director. If the relevant evidence is not provided within 5 working days, it shall be implemented in accordance with 4.2.

 金利集团 Jinli Group	文件名称：供应链风险减缓管理办法 File Name: Supply Chain Risk Mitigation Management Measures	版本号：第三版 Version number: Third edition
内控文件编号：HNJL-GYLGLBF-202310-01 Internal control document number: HNJL-GYLGLBF-202310-01	主控部门：期货部 Main Control Department: Futures Department	
编制/校准：秦跃强/侯凌燕 Prepared/calibrated by: Qin Yueqiang/Hou Lingyan	实施日期：2023年10月10日 Implementation date: October 10, 2023	

5. 整改计划

Rectification plan

5.1 在规定时间内提供相关证据的供应商，判为合格供应商，可继续合作。

5.1 Suppliers who provide relevant evidence within the specified time are judged to be qualified suppliers and can continue to cooperate.

5.2 在规定时间内未提供相关证据的供应商，判为不合格供应商，中止合作。

5.2 Suppliers that fail to provide relevant evidence within the specified time will be judged as unqualified suppliers and the cooperation will be suspended.

5.3 由期货部负责整改计划的下达和验收工作。

5.3 The futures department is responsible for the issuance and acceptance of the rectification plan.

5.4 整改计划中应明确整改目标、截止时间，实施进度并向公司高层进行汇报。

5.4 In the rectification plan, the rectification goals, deadlines, implementation progress, and reports should be made to the company's senior management.

6. 要求和征求意见

Requests and comments

 金利集团 Jinli Group	文件名称：供应链风险减缓管理办法 File Name: Supply Chain Risk Mitigation Management Measures	版本号：第三版 Version number: Third edition
内控文件编号：HNJL-GYLGLBF-202310-01 Internal control document number: HNJL-GYLGLBF-202310-01	主控部门：期货部 Main Control Department: Futures Department	
编制/校准：秦跃强/侯凌燕 Prepared/calibrated by: Qin Yueqiang/Hou Lingyan	实施日期：2023年10月10日 Implementation date: October 10, 2023	

要求公司员工、供应商和商业伙伴遵守上述政策，并采取必要措施来保障上述政策的贯彻落实。愿意接受客户和相关组织的监督，并欢迎供应商和利益相关方对上述政策提供建议，记录专项、会议记录、退货通知单。

Company employees, suppliers and business partners are required to abide by the above policies and take necessary measures to ensure the implementation of the above policies. Willing to accept the supervision of customers and related organizations, and welcome suppliers and stakeholders to provide suggestions on the above policies. Record special items, meeting minutes, and return notices.

河南金利金铅集团有限公司
 Henan Jinli Gold And Lead Group Co., Ltd.

2023年10月10日
 October 10, 2023