



金利集团
Jinli Group

Henan Jinli Gold and Lead Group CO., LTD.

Due Diligence Management Compliance Report of Gold and Silver

Supply Chain in 2023

(Published in January 2024)

河南金利金铅集团有限公司

2023 黄金白银供应链尽职调查合规报告

(2023/01/01-2023/12/31)

Company Name:	河南金利金铅集团有限公司 Henan Jinli Gold and Lead Group CO., LTD.
Location:	中国河南济源市承留镇南勋村 NANXUN VILLAGE,CHENGLIU TOWN,JIYUAN CITY,HENAN PROVINCE,CHINA
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Senior management responsible for this report:	Ms. Si Lijie/Compliance Director

根据 LBMA 发布的负责任黄金第 9 版以及负责任白银第 1 版的要求，打击系统性或广泛性的侵犯人权行为、避免产生冲突，以及遵守高标准的反洗钱和打击恐怖主义融资行为，公司不断完善黄金（白银）供应链尽职调查管理制度，明确组织机构及职责，优化调查程序，多渠道开展尽职调查工作。本报告总结了河南金利金铅集团有限公司 2023 年度内对《负责任的黄金指南》、《负责任的白银指南》要求的遵守情况。

In accordance with the requirements of the ninth edition of the Responsible Gold Guidance issued by LBMA, to combat systematic or widespread human rights violations, avoid conflicts, and comply with high standards of anti-money laundering and terrorist financing, the Company has continuously improved the due diligence management system for the gold (silver) supply chain, clarified

organizational structures and responsibilities, optimized investigation procedures, and conducted due diligence work through multiple channels. Compliance with the requirements of the London Bullion Market Association (LBMA) Responsible Gold Guidance and the London Bullion Market Association (LBMA) Responsible Silver Guidance in 2023 by Henan Jinli Gold and Lead Group CO., LTD. was summarized in the report.

一、精炼厂概况

1. Overview of refinery

河南金利金铅集团有限公司成立于1995年,是中国民营500强企业。企业注册资金4.5亿元,占地面积500余亩,现有员工3000余人。从2012年开始,企业连续八年实现产值、销售收入双超百亿元,上缴税收超亿元,2018年产值突破200亿元,2019年完成产值270亿元,2020年完成产值400亿。

金利集团拥有国际先进水平的氧气底吹炉氧化-液态铅渣侧吹炉直接还原-电解铅生产线两条,贵金属冶炼生产线一条,废旧蓄电池生产线三条年处理量达44万吨,具备年产电解铅30万吨,黄金10吨,白银1500吨,硫酸25万吨,冰铜1万吨,次氧化锌5万吨,锑白1万吨,精铋1000吨的生产能力。

金利的主导产品“济金”牌铅锭、金锭、银锭是上海期交所交割品牌;铅锭在伦敦金属交易所(LME),银锭在伦敦金银市场协会(LBMA)注册。企业通过了ISO9001质量管理体系认证、

ISO14001 环境管理体系认证、ISO45001 职业健康管理体系认证，国家两化融合管理体系认证。

Henan Jinli Gold and Lead Group Co., Ltd. was established in 1995 and is one of China's top 500 private enterprises.

The company has a registered capital of 450 million yuan, covers an area of more than 500 acres, and has more than 3,000 employees. Since 2012, the company has achieved an output value and sales revenue of more than 10 billion yuan for eight consecutive years, and paid more than 100 million yuan in tax revenue. In 2018, the output value exceeded 20 billion yuan, and in 2019 the output value reached 27 billion yuan, In 2020, the output value will reach 40 billion yuan.

Jinli Group has two international advanced oxygen bottom blowing furnace oxidation-liquid lead slag side blowing furnace direct reduction-electrolytic lead production lines, one precious metal smelting production line, three waste battery production lines with an annual processing capacity of 440,000 tons, and an annual output of electrolytic lead

300,000 tons, 10 tons of gold, 1,500 tons of silver, 250,000 tons of sulfuric acid, 10,000 tons of matte, 50,000

tons of zinc oxide, 10,000 tons of antimony white, 1,000 tons of refined bismuth.

Jinli's leading products "Jijin" brand lead ingots, gold ingots and silver ingots are the delivery brands of Shanghai Futures Exchange; lead ingots are registered on the London Metal Exchange (LME) and silver ingots are registered with the London Bullion Market Association (LBMA).

The company has passed ISO9001 quality management system certification, ISO14001 environmental management system certification, ISO 45001 occupational health management system certification, and national integration management system certification.

二、 供应商概况

II. Overview of supplier

公司主要原料来源为国内外矿山物料中提炼的黄金和白银，2023 年度所有供应商经过评估均为低风险供应商。

The main source of raw materials of the company is gold and silver refined in ore materials at home and abroad. All suppliers in 2023 were evaluated as low -risk suppliers.

三、 合规情况概述

III. Overview of compliance

公司对所有供应商进行尽职供应链调查，要求所有供应商金

(银) 原料来源合法、合规。

The Company conducts due diligence supply chain survey on all suppliers and requires all suppliers to source gold (silver) raw materials legally and in compliance.

第 1 步：建立强大的公司管理体系

Step 1: Establish strong company management systems

合规声明：

Compliance Statement with Requirement:

我方已完全遵照第 1 步：建立强大的公司管理体系。

We have fully complied with Step 1: Establish strong company management systems.

1.1 公司黄金和白银的供应链尽职调查政策

1.1 Company' s supply chain due diligence policy for gold and silver

2023 年为了建立适当的供应链尽职调查政策和治理结构，监督预防和减轻冲突矿产和/或不利的环境、社会 and 治理 (ESG) 因素在公司供应链中的风险，公司根据新版指南要求更新黄金 (白银) 供应链尽职调查的政策，明确尽职调查流程和调查范围，使得采购政策有据可查，政策明确指出采购不应涉及所有威胁性融资风险，包括经济合作与发展组织附件二所列风险，并根据《负责任黄金指南》明确黄金供应链中需考虑的环境、社会 and 治理

(ESG) 因素。

In 2023, in order to establish an appropriate supply chain due diligence policy and governance structure and to monitor and mitigate the risk of conflict minerals and/or adverse environmental, social and governance (ESG) factors in the company's supply chain, the Company update the due diligence policy of the gold (silver) supply chain, clarify the due diligence process and scope and make the procurement policy evidence-based according to the requirements of the new guidance. The policy specifies that procurement should not involve all threatening financing risks, including those listed in Annex II of OECD and identifies environmental, social and governance (ESG) factors to be considered in the gold supply chain in accordance with the LBMA Responsible Gold Guidance.

公司 2023 年度修订的第三版《黄金（白银）供应链尽职调查管理制度》于 2023 年 10 月 10 日,通过了董事会批准,并在公司官网 (http://www.jyjlyl.com/gonggao_detail_1/26.html) 上予以公布,确保了公司黄金（白银）尽责体系的有效运行。

The third edition of the third edition of the "Gold (Silver) Supply Chain of Gold (Silver) Supply Chain of Gold (Silver)", which was revised in 2023, passed the board of directors on October 10, 2023, and on the company's

official website

(http://www.jyjlyl.com/gonggao_detail_1/26.html)

announced the effective operation of the company's gold (silver) responsibility system.

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，确保矿产金银来源符合 LBMA 尽职调查管理要求，并作出承诺，拒绝来自侵犯人权、支持非法非国家武装团体或公共或私人安全部队行为、贿赂、不遵守政府税收、费用和使用费的规定、洗钱、助长冲突、不遵守环境和可持续发展法律要求、冲突地区、恐怖主义融资、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 Company and its suppliers were required in the policy to strictly abide by the national laws and regulations on employee rights, environmental protection, fair trade and other laws and regulations and vigorously engage in the supply chain due diligence to ensure that the sources of minerals of gold and silver and meet the LBMA's due diligence management requirements. Besides, the Company and its suppliers were also required in the policy to make a commitment to reject gold and silver from high-risk areas such as human rights violations, support for illegal non State armed groups or public or private

security forces, bribery, non-compliance with government taxes, fees, and royalties, money laundering, conflict fuelling, non-compliance with environmental and sustainable development legal requirements, conflict areas, terrorist financing, illegal mining, World Heritage sites, and the use of mercury for mining.

1.2 内部管理组织架构

1.2 Organizational structure of internal management

公司已经建立了供应链尽职调查管理制度，明确了组织架构及管理职责。公司设置合规委员会、合规总监、合规专员。

The Company established a supply chain due diligence management system, clarifying the organizational structure and management responsibilities. The Company set up a Compliance Committee, a Compliance Director,, and a Compliance Officer.

合规委员会由公司总经理任主任，公司副总任副主任，委员成员包括相关部门、车间主要负责人。合规委员会负责审批供应链尽职调查政策和制度、合规报告，负责提供足够的资源支持开展供应链尽职调查流程和系统的运行和监控。

The post of Compliance Committee was held by the General Manager of the Company, and the Deputy General

Manager of the Company was the Deputy Director. The members of the Committee included the main persons in charge of relevant departments and workshops. The Compliance Committee was responsible for approving supply chain due diligence policies and systems, compliance reports, and providing sufficient resources to support the operation and monitoring of supply chain due diligence processes and systems.

合规总监由公司董事会成员常务副总李进富担任，其拥有丰富的管理能力、知识和经验。负责主持金利金铅公司日常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，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，协调处理供应链尽职调查中的异常情况，审核合规报告，组织培训等工作。

The director of compliance is Li Jinfu, the executive deputy president of the company's board of directors, and has rich management capabilities, knowledge and experience. Responsible for hosting the daily service chain of Jinlijin Leading Company, establishing a sound survey and management system for the supply chain, supervising the supply chain's dedicated investigation process, reporting the company's risk assessment, response and implementation,

etc. , Report the abnormal situation in the supply chain's dedication, coordinate handling the abnormal situation in the supply chain's dedication investigation, review the compliance report, organize training and other tasks.

合规专员由期货部、现货供应部、进出口、财务部、物流部，负责严格执行供应链尽职调查措施和零容忍、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 commissioner is responsible for strictly implementing the supply chain investigation measures, zero tolerance, high -risk supply chain review criteria for strict implementation of the supply chain, collecting and preserving sufficient supply chain certification documents, and establish a sufficient supply chain certification document. Supplier's due diligence files and regularly conduct on -site investigations on important suppliers.

2023 年，公司严格执行《供应链尽职调查管理办法》，按照要求开展供应链尽职调查工作，调查所有供应商资质，监控所有交易，未与零容忍供应链和高风险供应链建立关系。同时，所有原料采购业务均签订合同、供应商承诺书（作为合同附件），合同严格按照公司规定的审批流签订，所有供应商均承诺原料来源符合黄金、白银指南要求。本年度，公司未发生因调查工作不

力或虚报材料产生的考核处罚事项。

In 2023, the Company strictly implemented the Supply Chain Due Diligence Management Measures, conducted supply chain due diligence work as required, investigated all supplier qualifications, monitored all transactions, and did not establish relationships with zero tolerance supply chains and high-risk supply chains. In addition, a contract and letter of commitment for suppliers were signed for all raw material procurement businesses (as annexes to the contract) in strict accordance with the approval process specified by the Company. All suppliers promised that the source of raw materials complied with the requirements of the gold and silver guidance. The Company did not encounter any assessment and punishment issues due to poor investigation work or false reporting of materials this year.

1.3 强有力的内部追溯体系

1.3 Strong internal traceability system

公司会对所有的供应商进行尽职调查，填写 KYC 问卷，尽职调查完成后签订合同并要求供应商出具《承诺书》，承诺原料合法合规，符合《供应链尽职调查管理制度》要求。

The Company conducted due diligence on all suppliers, required them to fill in the KYC questionnaire, sign a

contract after the due diligence was completed, and issue a Letter of Commitment, promising that the raw materials are legal and compliant, and comply with the requirements of the Supply Chain Due Diligence Management System.

公司建立了一套供应链可追溯体系，根据《负责任黄金（白银）指南》中对贵金属各种来源进行识别，每一批移交我公司的原料均有台账记录，包括供应商名称、原产地、材料类型、移交日期、移交重量、成色等。每一批出库标准金银锭均分配唯一编号，并有出库台账记录，包括出库日期、出库重量等。

The company has established a set of supply chain traceability systems to identify the various sources of precious metals in accordance with the Guidelines for the Gold (Silver) Guide in Responsible. Origin, material type, transfer date, transfer weight, color, etc. Each batch of standard gold and silver ingots is allocated by the unique number, and there are records of lending accounts, including the date of the outbound, the weight of the outlet, etc.

1.3.1.1 来料

1.3.1.1 Incoming material

我公司拥有专业的运输团队，负责从供应商处接洽原料到精炼厂。该团队中设置有合规专员，在这过程中，合规专员会根据来料地址、发货地址进一步排除风险，跟踪运单号，对初级产品

的原产地证明、可回收和原始库存的原产地证明进行追溯，若有异常会立即报告给合规风控官并拒收、拒发原料或隔离原料。到厂的原料由验收人员再复核是矿金、回收金、矿银、回收银，每批次原料给一个唯一的编号，并由验收人员在熔铸过程中取样，记录到达的日期和精炼加工及出库过程结束的日期。

The company has a professional transportation team, which is responsible for transporting raw materials from suppliers to refineries. A compliance expert has set up a compliance expert in the team. He will further eliminate risks based on the address of the materials and the address of the transport, track the Waybill number, track the origin certificate of the main product, and immediately report to the compliance risk control official whether there is an abnormality and the abnormalities and the compliance risk control officials. Refuse to receive and deliver or isolate raw materials. Officials should re-inspect the plant's raw materials as ore, gold, ore and recycled white silver. Each batch of raw materials shall be performed by the receiver during the melting and casting process and sample. The date of arrival and the complete date of the processing and storage procedures should be recorded.

2023 年度来料，发货按照上述各项管理方法、程序进行了

严格的管理，尚未发现零容忍供应链和高风险供应链。

In 2023 incoming materials and delivery have been strictly managed according to the above management methods and procedures, and no zero-tolerance supply chain or high-risk supply chain has been found.

1.3.1.2 过程监控

1.3.1.2 Process monitoring

合同签订前，由合规专员根据《供应链尽职调查管理制度》进行调查，填写 KYC 问卷，对供应链进行初步调查。调查完毕后，签订合同，同时将《供应商承诺书》作为合同的附件，一并进行签署盖章，让供应商承诺原料合法合规，符合《负责任黄金（白银）指南》要求。

The Compliance Officer investigated the supply chain before signing the contract in accordance with the Supply Chain Due Diligence Management System included in the KYC questionnaire. The supplier was able to guarantee that the raw materials were legal, compliant, and satisfied the requirements of the Responsible Gold (Silver) Guidance by signing the Letter of Commitment for the Supplier as an attachment to the contract when the inquiry was finished.

公司建立了一套供应链可追溯体系，每一批移交我公司原料均有台账记录，包括供应商名称、移交日期、移交重量、成色等。每一批出库标准金银锭均分配唯一编号，并有出库台账记录，包

括出库日期、出库重量等，所有经公司审核的出库流向风险可控。

The company has established a supply chain traceability system, and each batch of raw materials transferred to our company has ledger records, including supplier names, transfer date, transfer weight, and color. Each batch of standard gold and silver ingots is allocated by the unique number, and there are records of lending accounts, including the date of the outbound and the weight of the outbound.

在业务开展前，我公司会收集供应商营业执照、资质验证资料、KYC 调查表、环评等资料。每一批次的货物移交单、化验单、结算单、银行转账等相关记录保存 5 个财年以上。

Before the business, the Company will collect the supplier's business license, qualification verification data, KYC questionnaire, environmental assessment and other data. Related records such as delivery sheet, laboratory test sheet, settlement sheet and bank transfer for each batch will be kept for more than 5 fiscal years.

1.4 沟通机制

1.4 Communication mechanism

1.4.1 培训

1.4.1 Training

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专员对供应链尽职调查管理的要求，主要基于 LBMA 负责任黄金（白银）指南进行培训，确保供应链尽职调查管理工作落到实处。

2023 年我公司共开展了 2 次供应链尽职管理体系相关内容的培训，如 LBMA 负责任黄金第九版以及白银第一版，以及 OECD 经合组织的指南文件，以及识别风险地区工具 CAHRAS 的使用查询方法，以及相关制裁国家的工具包使用以及 ESG 相关信息资料的学习，以及相关纰漏准则，每次培训均邀请业务合作单位代表现场参与或视频会议，培训现场通过互动提问的方式，整体达到良好的培训效果。此类培训计划旨在帮助有关员工和供应商深入了解《黄金（白银）供应链尽职调查管理制度》和相关工具包，尽职管理政策、制度、流程、披露指南进行了培训，培训现场通过互动提问的方式，整体达到良好的培训效果。

The company incorporates the supply chain's full-time investigation and management training every year into the company's annual training plan. The requirements for the company's key positions and the requirements of the compliance commissioner on the supply chain's dedicated investigation and management are mainly based on the LBMA responsible gold (silver) guide. The investigation and management work has been implemented.

In 2023, our company carried out a total of two training

chain management system related content, such as LBMA responsible Gold Ninth Edition and the first edition of Silver, as well as the OECD Economic Organization Guide Documents, and the use query of the use of Cahras in the risk area. Methods, as well as the use of tool packages of related sanctions and the improvement of ESG -related information, and related leakage criteria. Each training invites business cooperation units to participate in on-site participation or video conferences. Training effect. Such training plans are designed to help relevant employees and suppliers in depth to understand the "Gold (Silver) Supply Chain Division of the Survey and Management System" and related tool packages, due to diligence management policies, systems, processes, and disclosure guidelines for training. The way to achieve a good training effect as a whole.

1.4.2 内部沟通

1.4.2 Internal communication

合规小组内部每月至少组织一次月度讨论,就当月的供应链相关信息进行内部通报。沟通事项包括日常尽职调查管理工作内容及评审原料采购部门对于当期合作客户尽职调查工作文件,对于尽调工作开展不完善的供应商进行二次尽调,包括派遣合规专员进行供应商辅导,提高供应商对其上下游的尽职调查能力。

A discussion is organized at least once a month within the compliance team to report current information related to supply chain. The communication matters include the daily due diligence management and review of due diligence work documents for current customers by the Raw Material Procurement Department, secondary due diligence for suppliers with imperfect due diligence, including sending compliance specialists to provide guidance to suppliers, and improving suppliers' due diligence ability on their upstream and downstream.

公司支持实施采掘业透明度行动计划的倡议。

The company supports the implementation of the initiative of the excavation industry transparency action plan.

公司已建立机密申诉机制，公布利用官网平台 (http://www.jyjlyl.com/gonggao_detail_1/26.html)，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。公司内部也设置有举报箱，举报箱由合规风控官定期开箱检查。2023年公司未接收到员工和外部利益相关方的申诉。

The Company established a confidential complaint mechanism with the official website platform

(http://www.jyjlyl.com/gonggao_detail_1/26.html) to announce phone numbers and email addresses, allowing employees and external stakeholders to express concerns about the supply chain or any new identified risks, protecting employee privacy throughout the appeals process, keeping informant information confidential with prevention of retaliation for any actions. The Company also provided an internal reporting box, regularly opened for inspection by the compliance risk control officer. In 2023, the Company did not receive complaints from employees and external stakeholders.

第 2 步 识别与评估供应链风险

Step 2: Identify and assess risk in the supply chain

合规声明与要求:

Compliance Statement with Requirement:

我公司已遵守第 2 步骤:对供应链中的风险进行识别和评估。

We have fully complied with Step 2: Identify and assess risk in the supply chain

公司严格遵守 LBMA 黄金、白银责任指南第二步“供应链风险的识别与评估”的要求,制定了零容忍供应链和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。2023 年，未发现零容忍供应链和高风险供应链。

The Company strictly abided by the requirements of “identify and assess risk in the supply chain” in Step 2 of LBMA Responsible Gold and Silver Guidance, developed criteria for determining zero tolerance supply chains and high-risk supply chains, and formulated procedures for handling the identified risks, fully identifying and evaluating risks in the supply chain. In 2023, zero tolerance supply chains and high-risk supply chains were not found.

2.1 开展供应链尽职调查，识别潜在风险

2.1 Conduct supply chain due diligence to identify potential risks

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 并扩展至供应链中不利 ESG 因素，精炼厂识别相关风险，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等地区的黄金和白银，以及用于贿赂、洗钱、恐怖主义融资等行为的黄金和白银。公司为每个供应商建立供应商档案，填写 KYC 问卷，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。

According to Annex II of the OECD Due Diligence

Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Regions and adverse ESG factors extended to the supply chain, gold smelting company identified relevant risks with close attention to gold from areas such as non-compliance with environmental and sustainable development law requirements, human rights violations, armed conflict, illegal mining, exploitation and utilization of mercury, and from World Heritage sites, as well as for bribery Gold And silver for money laundering, terrorist financing, etc. The Company established a supplier file for each supplier for filling in a KYC questionnaire, completed the establishment of the supplier file before signing a contract with it, and performed a risk rating on it.

合作前，公司对于所有供应商均进行供应链的尽职管理调查，风险评判细则涵盖了位置风险、公司风险、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、多德一弗兰克法案第 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）、关于高风险黄金和白银中心/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，在进行合作前要求合作方提供符合供应链尽职调查管理制度要求的相关资质证明文件，对供

应商基本情况、股东信息、提供原料类型及产地、贵金属类型、结算方式等信息进行调查,并尽可能地将供应链调查向供应商的上游延伸,对于涉及零容忍供应链、高风险供应链的供应商拒绝合作。

Before the cooperation, the company conducted due diligence investigations of all suppliers. The risk evaluation rules covered the three dimensions of location risk, corporate risk, and raw materials risk. The location risk can be referred to the international sanctions list recognized by the Chinese government, Dude -Frank -Frank. Article 1502 of the bill, the European Union's CAHRA list, Heidelberg barometer, the fragile national index or similar index, the report of the UN High Commissioner's Office or the same institution, and the financial action group (FATF) (including related countries/regional reports) 2. Regarding the reliable market intelligence of high -risk gold And silver centers/transshipment centers and countries/regions of high money laundering risks, fill in the KYC questionnaire, and request partners to provide partners with relevant qualification certification documents that meet the requirements of the supply chain investigation and management system. Basic situation, shareholders' information, providing raw materials and

origin and origin, precious metal type, settlement method and other information, and extend the supply chain survey as much as possible to the upstream of the supplier. For the supply of zero tolerance supply chain, high -risk supply chain, Business refuses to cooperate.

合作过程中，对于供应商商业活动动态进行了解和评估，持续对供应商信息进行追踪调查。充分发挥网络作用，利用企查查、中国审判信息网、 IPE 等网站对供应商资质情况、失信情况、诉讼情况、处罚情况进行查询。 我公司对所有供应商进行了专项尽职调查，2023 年期间未出现高风险客户。

During the cooperation process, the dynamics of supplier business activities were understood and evaluated with supplier information continuously tracked and investigated. The Company made full use of the network to query supplier qualifications, breach of trust, litigation, and penalty through websites such as Tianyancha, China Trial Information Network, and IPE. Our company conducted special due diligence on all suppliers without high-risk customers during 2023.

以上调查和评估均有合规小组成员参加，从各自负责的领域对于供应商进行评估，由合规风控官进行汇总，报合规总监进行综合评审，评审结果由合规总监上报合规委员会。

The above investigation and assessment were attended

by members of the compliance team, who evaluated suppliers from their respective areas of responsibility. The Compliance Risk Control Officer summarized and reported them to the Compliance Director for comprehensive review. The review results were reported by the Compliance Director to the Compliance Committee.

年底，由合规风险官总结 2023 年度供应链尽职调查工作，并对下一年工作制定计划，形成合规报告，由合规总监审核后，报合规委员进行审批。审批通过后，在公开网站上进行公示。2023 年度期间，公司完成所有供应商尽职调查，未发现零容忍供应链和高风险供应链。2023 年度对供应商的调查和评估结果均为低风险。

At the end of the year, the Compliance Risk Officer summarized the supply chain due diligence work in 2023, formulated a plan for the next year's work, and formed a compliance report. After being reviewed by the Compliance Director, it was submitted to the Compliance Committee for approval. After approval, it was publicized on the public website. During the 2023 the Company completed all due diligence for the supplier without zero tolerance supply chain or high-risk supply chain found. The survey and assessment results of suppliers in 2023 were low risk.

2.2 识别零容忍供应链和高风险供应链

2.2 Identify zero tolerance supply chains and high risk supply chains

公司根据《负责任黄金（白银）指南》第九版和《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 相关规定，并扩展至供应链中不利 ESG 因素，制定零容忍供应链和高风险供应链评判标准。风险评判细则涵盖了位置、供应链、原料类型三个维度。

In accordance with the Ninth Edition of the Responsible Gold (Silver) Guidance and Annex II of the Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Regions, the Company developed assessment criteria for zero tolerance supply chains and high risk supply chains, extending to adverse ESG factors in the supply chain. The risk assessment rules covered three dimensions: location, supply chain, and material type.

位置风险可参考中国、联合国、英国、美国、欧盟等制裁名单、多德-弗兰克法案第 1502 条、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)、关于高风险黄金中心/转运中心和高洗钱风险国家/地区的可靠市场情报。供应链风险可使用工具包中的 KYC 调查问卷对供应链进行风险识别。原料类型风险将原料分类为大规模开采、手工和

小规模开采、再生金银，再根据各个类型的风险识别要求进行识别。

For location risk, please refer to the international sanctions list approved by the Chinese government, Sanction lists such as the United Nations, the United Kingdom, the United States, the European Union, Article 1502 of the Dodd Frank Act, the EU CAHRA list, the Heidelberg Barometer, the Vulnerable Countries Index or similar indicators, the reports of the Office of the United Nations High Commissioner for Human Rights or equivalent institutions, the Financial Action Task Force (FATF) (including relevant country/region reports) Reliable market intelligence on high-risk gold centers/transit centers and countries/regions with high money laundering risk. Supply chain risk could be identified with the KYC questionnaire in the toolkit. Raw materials were classified into large-scale mining, manual and small-scale mining, and recycled gold and silver in raw material type risk and identified according to the risk identification requirements of each type.

根据《供应链尽职调查管理制度》中规定的零容忍供应链评判标准进行供应商识别，2023 年度期间我公司采购的原料没有来自被指定为世界遗产或保护区的地区，没有来自违反国际制裁

国家（得到中国政府认可），也不存在供应相对方、其他已知的上游公司或它们的最终受益者是已知的洗钱者、诈骗或恐怖分子，不存在曾涉嫌严重侵犯人权，不存在直接或间接支持非法的非国家武装组织，不存在欺骗性地谎报矿物来源。

According to the zero tolerance supply chain evaluation criteria specified in the Supply Chain Due Diligence Management System, supplier identification was conducted. During the year 2023, the raw materials purchased by the Company did not come from regions designated as world heritage or protected areas, did not come from countries that violate international sanctions (recognized by the Chinese government), did not have supply counterparties, other known upstream companies, or their ultimate beneficiaries were known money launderers. There were no fraudulent or terrorist individuals suspected of committing serious human rights violations without non-state armed organizations that directly or indirectly supported illegal activities as well as fraudulent misrepresentation of mineral sources.

综上，2023 年度期间未发现零容忍供应链和高风险供应链，所有采购有序合规进行。

In conclusion, no zero-tolerance supply chain or high-risk supply chain was found during 2023, and all

procurement was conducted in an orderly and compliant manner.

2.3 关于强化尽职调查的说明

2.3 Notes on enhanced due diligence

2023 年度期间公司供应链未出现高风险供应链，所以未触发强化尽职调查。

No high risk supply chain occurred in the Company's supply chain during 2023, so no enhanced due diligence was triggered.

公司从严控供应链风险出发，在合规风控官的带领下，合规小组就有具体营业场地的供应商进行了实地考察，考察内容包括：业务类型、材料类型、来源地说明、运输方式、上游供应商数量、交易支付方式等。对于单个供应商的实地考察将会每年度至少进行一次。

In order to strictly control supply chain risks, under the leadership of the Compliance Risk Control Officer, the compliance team conducted field visits to suppliers in specific business locations, including business type, material type, origin description, mode of transportation, number of upstream suppliers, transaction payment method, etc. Site visits to individual suppliers will be conducted at least once a year.

第 3 步 设计并实施策略来应对已识别的风险

Step 3: Design and implement a management strategy to respond to identified risks

合规声明与要求：

Compliance Statement with Requirement:

我公司已完全遵守第 3 步：设计和落实管理体系应对识别的所有风险。

We have fully complied with Step 3: Design and implement a management system to respond to identified risks.

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 年未发现零容忍、高风险供应链，因此未采取供应链风险减缓措施。

The Company strictly abided by the requirements of “design and implement a management strategy to respond to identified risks” in Step 3 of LBMA Responsible Gold and Silver Guidance. No zero tolerance risk and high risk were not identified and assessed in 2023. Therefore, no supply chain risk mitigation measures were taken.

当发现供应商属于零容忍供应链或高风险供应链，公司会立即停止或暂停与合作方的合作关系。

When a supplier was found to belong to a zero tolerance

supply chain or a high-risk supply chain, the Company immediately stopped or suspended the cooperative relationship with its partners.

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 suspected high-risk incoming materials are received, they were separately registered and notified to the Refining Workshop. Their raw materials were separately smelted, and not be mixed with other customers during the entire process. Finished gold and silver produced from their raw materials were separately numbered, and stored in the vault in zones with other finished gold and silver. All incoming materials violating environmental and sustainable development principles were regarded as high-risk incoming materials, registered separately, smelted separately, numbered separately, and stored in different regions.

3.1 就识别的风险涉及风险管理策略

3.1 Involve risk management strategies in identifying

risks

公司根据风险评估确定了风险管理策略，终止关系、暂停关系、维持关系。

The Company determined a risk management strategy based on risk assessment, including terminating, suspending, and maintaining relationships.

3.1.1 确认终止关系，规避风险

3.1.1 Confirm termination of relationship and avoid risks

如果强化尽职调查发现供应商存在参与洗钱、资助恐怖主义、严重侵犯人权、直接或间接支持非国家武装团体以及对矿物来源进行虚假陈述的线索，应立即与供应商终止合作。对于终止合作的供应商，公司应根据国内外适用的法律要求，向有关部门和LBMA 报告此类情况。

In case that the supplier involved in money laundering, terrorist financing, serious human rights violations, direct or indirect support for non-state armed groups, and false statements about the source of minerals is found in enhanced due diligence, the Company should immediately terminate cooperation with the supplier. For suppliers with cooperation terminated, the Company shall report such situations to relevant departments and LBMA in accordance with applicable domestic and foreign legal requirements.

3.1.2 确认暂停关系，在暂停交易的同时降低风险

3.1.2 Confirm the suspension relationship and reduce risks during suspending transactions

如果强化尽职调查有理由怀疑供应商存在参与洗钱、恐怖主义融资、严重侵犯人权、直接或间接支持非国家武装团体、对矿物来源进行虚假陈述以及灾难性 ESG 影响的情况，公司应暂缓从供应商处采购原料，直到获取更多的信息和证据。一旦供应商提供了反驳初步怀疑的补充信息/数据，或对解决 ESG 影响作出了及时和适当的反应，经过合规总监批准后可以恢复进行。

In case a supplier is suspected of involvement in money laundering, terrorist financing, serious human rights violations, direct or indirect support for non-state armed groups, misrepresentation of mineral sources, and catastrophic ESG impacts during enhanced due diligence, the Company should suspend the procurement of raw materials from the supplier until more information and evidence are obtained. Once the supplier provides supplementary information/data to refute initial suspicions, or responds promptly and appropriately to address ESG impacts, the process can be resumed with the approval of the Compliance Director.

3.1.3 确认保持与改进计划的关系，在继续交易的同时降低风险

3.1.3 Confirm that the relationship with the improvement plan is maintained to reduce risks during continuing the transaction

如果强化尽职调查未发现潜在问题或存在少量问题，包括贿赂、对矿物来源进行非欺诈性虚假陈述、不缴纳应付给政府的税费和特许权使用费、严重违反环境、健康、安全、劳动和社区相关地方立法或极有可能造成高度不利影响的 ESG 风险时，供应商能提供包含明确改进计划和时间表的风险解决方案，并经合规风险官审核、合规总监批准后公司可以与该供应商开展正常合作关系。风险解决方案应包含明确绩效目标、基于定量和定性分析的绩效评估指标和合理的完成日期。

A supplier can provide a risk solution including a clear improvement plan and schedule in case no potential issues are identified or a small number of issues exist, including bribery, non-fraudulent misrepresentation of mineral sources, non-payment of taxes and royalties payable to the government, serious violations of environmental, health, safety, labor, and community related local legislation, or ESG risks that are highly likely to have a significant adverse impact during enhanced due diligence. In addition, the Company can establish a normal cooperative relationship with the supplier after being reviewed by the Compliance Risk Officer and approved

by the Compliance Director. Risk solutions should include clear performance goals, performance evaluation indicators based on quantitative and qualitative analysis as well as reasonable completion dates.

3.2 风险管理策略

3.2 Risk management strategy

3.2.1 监控改进计划

3.2.1 Monitoring improvement plan

基于诚信的原则，当公司与供应商维持关系，执行改进计划时，对交易相对方采取可衡量步骤、业绩监测、定期重新评估风险、定期并向合规总监报告等措施。

Based on the principle of integrity, measures such as measurable steps, performance monitoring, regular reassessment of risks, and regular reporting to the Compliance Director were taken against counterparties when the Company maintained relationships with suppliers and implemented improvement plans.

风险监测至少应在开始实施改进计划的六个月内，确定消除风险的重大和可衡量的改进措施。根据六个月取得的进展，在修订后的改进计划中规定附加措施。正式评估绩效，以确定在截止日期前措施已得以适当实施（如通过独立审计、后续现场访问或远程审查）。

Significant and measurable improvement measures to

eliminate risks in risk monitoring should be identified at least within six months of starting implementation of the improvement plan. Based on the progress achieved over the past six months, additional measures were specified in the revised improvement plan. Performance was formally evaluated to determine that measures were properly implemented by the deadline (e.g., through independent audits, subsequent on-site visits, or remote reviews)

为促进监测活动，酌情咨询利益相关者，如地方政府机构、上游公司、国际或公民社会组织，以及受影响的第三方，充分发挥网络作用。

In order to facilitate monitoring activities, stakeholders were consulted, such as local government agencies, upstream companies, international or civil society organizations, and affected third parties, as appropriate, to fully leverage the role of the network.

在改进关系确立的6个月时间段之后，当改进有限或没有可衡量的改进予以证明时，暂停合作关系，直到供应商响应改进计划。在降低风险和改善表现的尝试失败后终止关系。

When improvements were insufficient or there were no quantifiable changes to justify after the initial six months of the improvement relationship, the partnership was put on hold until the supplier complied with the

improvement plan. After fruitless attempts to lower risk and enhance performance, the partnership was terminated.

根据 2023 年的尽职调查结果，并未出现供应商需要进行风险缓解的管理策略。所有供应商合作关系都是持续而良好的合作关系，并未出现终止、暂停关系的情形。

According to the due diligence results in 2023, there was no management strategy for suppliers requiring risk mitigation. All supplier partnerships were ongoing and good without any termination or suspension of relationships.

3.2.2 定期重新评估与持续监控，以确保有效的风险管理

3.2.2 Regular reassessment and continuous monitoring to ensure effective risk management

业务部门负责收集供应商信息的所有变更情况，持续监控交易结果并进行年度供应链尽职调查重新评估，以决定是否继续合作。

The Business Department assumed responsibility for gathering all updates to supplier data, regularly tracking transaction outcomes, and completing annual supply chain due diligence and reevaluation to determine whether to continue working together.

采购的每一批次的原料在运输、出入库、生产、付款过程都有合规专员的监控，其中入库执行产品成入库流程，有合规专员

审核，出库执行出库联签程序，有合规专员确认，付款执行经济联签业务审批程序，报合规总监批准。

Each batch of purchased raw materials was monitored by a Compliance Officer during the transportation, warehousing and storage, production, and payment processes. The storage process was followed by the product storage process, and warehousing was reviewed by a Compliance Officer with the warehousing joint signature process followed. The confirmation by a Compliance Officer was followed. The payment process was followed by the economic joint signature business approval process, and reported to the Compliance Director for approval.

3.3 定期报告

3.3 Periodic reports

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后报政府有关部门。2023 年公司对所有供应商进行了风险评估，合规风险官已对评估结果进行汇总，并向合规总监提交了报告，经合规总监审核完毕后，提交合规委员会审批，通过后在公开网站上公布。

The Company has established a risk assessment and reporting system, and the Compliance Officer reports the department's due diligence work to the Compliance Risk

Officer every month. When it was found in the supply that chain investigation coming from a high-risk area was assessed as a high-risk supply chain, the transaction was stopped and reported to the Compliance Director for approval before being reported to the relevant government departments. In 2023, the Company conducted a risk assessment for all suppliers, and The Compliance Risk Officer summarized the assessment results and submitted a report to the Compliance Director. After the review by the Compliance Director, the report was submitted to the Compliance Committee for approval and was published on the public website after approval.

第 4 步 对精炼商的尽职调查实践开展独立的第三方审计

Step 4: Arrange for an independent third-party audit of the refiner due diligence

合规声明与要求:

Compliance Statement with Requirement:

我们公司已经完全遵守第 4 步:安排供应链尽职调查的独立第三方审计。

We have fully complied with Step 4: Arrange for an independent third-party audit of the supply chain due diligence

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

The Company strictly abided by the requirements of “arrange for an independent third-party audit of the refiner due diligence” in Step 4 of LBMA Responsible Gold and Silver Guidance

公司聘请必维认证（北京）有限公司上海分公司开展审计工作。该公司按照国际标准在鉴证业务中执行了合理鉴证业务，即 ISAE3000 业务，但历史财务信息审计或审查除外（ISAE3000）。审计报告将在年度审计完成后在公司官网（http://www.jyjlyl.com/gonggao_detail/23.html）予以公布。

The Company hired Shanghai Branch of Bureau Veritas Certification (Beijing) Co., Ltd. to carry out the audit work. The Company performed reasonable assurance services in accordance with international standards, namely ISAE3000, except for the audit or review of historical financial information (ISAE3000). The audit report was posted on the official website of the Company after the annual audit was completed (http://www.jyjlyl.com/gonggao_detail/23.html).

第 5 步 供应链尽职调查年度报告

Step 5: Annual report on supply chain due diligence

合规声明与要求：

Compliance Statement with Requirement:

我公司已完全遵守第 5 步：有关供应链尽职调查的报告。

We have fully complied with Step 5: Report 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。

The Company strictly abided by the requirements of “Annual report on supply chain due diligence” in Step 5 of LBMA Responsible Gold and Silver Guidance.

公司每年通过公司官网 (<http://www.jyjlyl.com/kechixufazhan/1.html>) 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，以便其他利益相关者可下载获取。

Through the Company's official website (<http://www.jyjlyl.com/kechixufazhan/1.html>), the Company publicizes the on-site audit summary and evaluation report, due diligence management certificate, supply chain management system, and supply chain due diligence policy of the previous year each year so that

other stakeholders can download and obtain them.

四、管理结论

IV. Management conclusion

综上所述，河南金利金铅集团有限公司根据《伦敦金银市场协会（LBMA）负责任黄金（白银）指南》的要求，建立和完善了供应链尽职管理体系，识别和评估了供应链相关风险，设计并实施了风险管理策略，对供应链尽职调查工作进行了独立的第三方审计，同时将审计结果、公司政策、制度、合格证书等资料在公司官网上公布。因此，在报告年度截至2023年12月31日的财年内，河南金利金铅集团有限公司完全遵守《伦敦金银市场协会（LBMA）负责任黄金（白银）指南》。

In conclusion, Henan Jinli Gold and Lead Group CO., LTD. established and improved a supply chain due diligence management system, identified and evaluated supply chain related risks, designed and implemented risk management strategies, and conducted independent third-party audits of supply chain due diligence work in accordance with the requirements of the London Bullion and Silver Market Association (LBMA) Guidance for Responsible Gold (Silver). The data such as audit results, company policies, systems and certificates of competency was posted on the official website of the Company. Therefore, in the financial year ending December 31, 2023, Henan Jinli Gold and Lead Group

CO., LTD. fully complied with the London Bullion Market Association (LBMA) Responsible Gold (Silver) Guidance.

在下一个阶段的工作中，公司将致力于持续改进，更有效地将负责任采购理念及负责任尽职调查流程融入公司内部管理制度、程序、流程和实践。将定期在内部对任何已确定的纠正措施进行监控。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) 负责任黄金 (白银) 指南》的管理人员。

In the next stage of work, the Company will be committed to continuous improvement and more effectively integrate the concept of responsible procurement and responsible due diligence process into the internal management systems, procedures, processes and practices of the Company. Any identified corrective actions will be monitored internally on a regular basis. The corrective action plan is communicated separately to the LBMA executive and management of the London Bullion Market Association (LBMA) Responsible Gold (Silver) Guidance.

五、其他报告批注

V. Other report comments

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