

云南滇金投资有限公司
Yunnan Dianjin Investment Co., Ltd.
2021 年度供应链尽职管理合规报告
2021 Supply Chain Due Diligence
Management Compliance Report



2022 年 1 月 8 日
January 8, 2022

公司名称：云南滇金投资有限公司

Company name: Yunnan Dianjin Investment Co., Ltd.

注册地址：云南省昆明市高新区海源北路 6 号高新招商大厦

Registered Add: Hi-tech Zhaoshang Building, 6 Haiyuan North Road,
Gaoxin District, Kunming City, Yunnan Province, China

年终报告：2021 年度供应链尽职管理合规报告

Year-end report: 2021 Supply Chain Due Diligence Management
Compliance Report

报告日期：2022 年 1 月 8 日

Date of report: January 8, 2022

报告负责人：陈德海 公司副总经理

Person in charge of this report: Mr Chen Dehai, Vice General Manager

一、公司概况

I. Company profile

云南黄金集团下属云南滇金投资有限公司（以下简称“滇金公司”），是黄金、白银提纯精炼加工企业，成立于 2009 年，注册资本 1.5 亿元，注册地址为云南省昆明市高新区海源北路 6 号高新招商大厦，实际办公和精炼提纯地址为云南省昆明市东郊白沙河。滇金公司是昆明市工业企业经济贡献前 10 企业，昆明市百强企业，获“昆明市知名商标”、“云南省著名商标”和“名牌产品”，持有的“滇金”品牌金锭是上海黄金交易所及上海期货交易所认定的履约交割金锭，产品主要包括上海黄金交易所国标 1 号金、2 号金、投资金条等，

有专利 12 项。滇金公司拥有高温高压无氰解吸载金炭工艺、湿法提纯精炼黄金工艺、高电流银电解工艺和高效自动铸锭工艺，在黄金、白银提纯精炼领域处于国内领先地位。电解装置、高金银载金碳分段解吸电积方法，全国首创。

Yunnan Dianjin Investment Co., Ltd.(hereinafter referred to as “the Company”) is subsidiary of Yunnan Gold & Mineral Group Co., Ltd. the Company is gold and silver refining enterprise which was established in 2009 with a registered capital of RMB 150 million. The Company’s registered address is at Hi-tech Zhaoshang Building, 6 Haiyuan North Road, Gaoxin District, Kunming City, Yunnan Province, actual office and refinery address is at East Suburb of Kunming City, Yunnan Province. The Company is regarded as one of the top 10 enterprises contributing to the output value of industrial enterprises in Kunming City, “Top 100 Enterprise in Kunming City”. The Company has been awarded “Kunming Well known Trademark”, “Yunnan Province Famous Trademark” and “Famous-brand Product”. “Dianjin” brand gold bars are good delivery at both of Shanghai Gold Exchange and Shanghai Futures Exchange. The Company’s main products are National Standard No. 1 and 2 gold bars and investment gold bars. It is equipped with a high-temperature and high-pressure cyanide-free desorption gold-loaded carbon process, wet method gold refining process, , high-current silver electrolysis process and high-efficiency automatic ingot casting process and takes the lead in the field of gold and silver purification and refining in China.

二、 供应商情况概述

II. Overview of suppliers

公司主要原料来源分为上海黄金交易所、集团内各大矿山自产金和从外部企业收购的合质金，所有供应商经过评估均为低风险供应商。

The main sources of raw materials of the Company cover self-produced gold from major mines in the Group and crude gold purchased from the domestic market. All suppliers are 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，要求所有供应商提供的黄金原料来源合法、合规。

The Company carries out the due diligence supply chain investigation on all suppliers and requires that the sources provided by all suppliers are legal and compliant.

第一步 建立强大的公司管理体系

Step 1: Establish strong company management systems

合规声明与要求：

Compliance Statement with Requirement:

我公司已经充分遵守第 1 步骤：建立强大的公司管理体系。

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

公司严格遵守 LBMA 黄金责任指南第一步“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 followed the requirements of Step 1 of the LBMA Responsible Gold Guidance, “establish strong company management systems”. Strong management systems have been established to ensure the full implementation of supply chain due diligence.

1. 政策方面

1. Policy aspect

公司通过并出台了《云南滇金投资有限公司供应链管理政策》，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》并扩展至环境和可持续性责任，该政策在云南黄金矿业集团进行了公布，官网链接地址为：

https://www.ygmng.net/154/230/content_1317.html

The company adopted and issued the *Gold Chains Management Policy of Yunnan Dianjin Investment Co., Ltd*. The policy is in line with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and is extended to environmental and sustainability responsibilities. This policy has been published at the website https://www.ygmng.net/154/230/content_1317.html.

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、公平交易等各项法律法规，积极参与供应链尽职调查工作，确保开采金、回收金来源符合 LBMA 尽职调查管理要求，并作出承诺，拒绝来自侵犯人权、冲突地区、贿赂、洗钱、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。

The Company and its suppliers are required to strictly abide by the national laws and regulations on employee rights, environmental protection, fair trade and other laws and regulations and actively engage in the supply chain due diligence by the policy to ensure that the sources of mined gold and recycled gold meet the LBMA due diligence management requirements. Besides, the Company and its suppliers shall make a commitment to refuse the gold from high-risk areas with human rights violations, conflict areas, bribery, money laundering, terrorist financing, illegal mining, world heritage sites and mercury mining.

2. 管理架构

2. Management structure

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。公司已于 2022 年 01 月 04 进行了管理评审，并出具了书面管理评审结论。

The Company has established an internal management system and issued policies to define the management, roles and responsibilities, internal audit and communication and carry out senior management review. The Company has conducted management review on January 4, 2022 and issued management review conclusion in written.

2.1 规章制度方面

2.1 Rules and regulation aspects

公司根据《LBMA 负责任的黄金指南》制订了《云南滇金投资有

限公司供应链管理政策》《黄金供应链尽职调查规则》《云南滇金投资有限公司供应链风险减缓管理办法》《云南滇金投资有限公司供应链反洗钱政策》，主要明确供应链尽职调查组织架构、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。

According to the *LBMA Responsible Gold Guidance*, the Company formulated the *Supply Chain Management Policy of Yunnan Dianjin Investment Co., Ltd*, *Gold Supply Chain Due Diligence Rules*, *Supply Chain Risk Mitigation Management Measures of Yunnan Dianjin Investment Co., Ltd* and *Supply Chain Anti-Money Laundering Policy of Yunnan Dianjin Investment Co., Ltd*, which mainly clarified the organizational structure, responsibilities and definition of high-risk areas of supply chain due diligence and formulated high-risk supply chain evaluation standards, investigation and handling procedures, transaction monitoring, document preservation, etc. The above systems has been issued in the form of a red-headed document as document control after obtaining the approval of the General Manager's Office Meeting.

2.2 职责与权限

2.2 Responsibilities and authorities

公司设置尽职管理委员会、尽职管理工作办公室、尽职管理工作小组及合规专员。

The Due Diligence Management Committee, Due Diligence

Management Office, Due Diligence Management Working Group and Compliance Officer should be set by the Company.

尽职管理委员会云南滇金投资有限公司尽职管理委员会是公司推行 LBMA 黄金采购尽职管理体系的领导和决策机构,其主要职责:根据 LBMA 负责任的黄金指南内容制定公司黄金采购尽职管理相关政策、规定,指导日常尽职调查,监督洗钱、高危地区采购等风险管理及应对措施的实施,发现并纠正日常管理工作中的问题和不足;负责监督、检查公司黄金采购尽职管理体系和管理标准的建立,并定期更新;协调公司尽职管理办公室进行风险调查、识别、评估、应对等工作,并在公司层面做最终确认;协调公司及所属部门尽职管理交流和培训事项。

Due Diligence Management Committee of Yunnan Dianjin Investment Co., Ltd. is the leading and decision-making body for the Company to implement LBMA Responsible Gold Sourcing Due Diligence Management System and its main responsibilities are to: be responsible for formulating policies and regulations related to due diligence management for gold procurement of the Company according to the content of LBMA Responsible Gold Guidance, guiding daily due diligence, supervising the implementing risk management and countermeasures for money laundering and procurement in high-risk areas, and finding and correcting problems and deficiencies in daily management; take charge of supervising and inspecting the establishment for gold procurement due diligence management system and management

standards of the Company, and updating regularly; coordinate with the Company Due Diligence Office to carry out work such as risk investigation, identification, assessment and response to make final confirmation at the Company level, and coordinate with the Company and its departments on due diligence management communication and training.

尽职管理工作办公室是云南滇金投资有限公司推行 LBMA 尽职管理体系的牵头负责部门，负责公司各业务环节尽责管理工作的开展和指导，设在营销部。主要职责：制定公司黄金采购尽责管理政策、制度、流程及工作计划；负责实施公司黄金采购尽责管理架构，指导、协调、报告公司风险评估、应对和监控等情况；负责组织公司黄金采购尽责管理知识的学习和专业培训；协助公司经营班子召开尽责管理会议，讨论重大风险事项，执行公司决议，并监督、检查所属部门的落实情况，进行考核。

Due Diligence Management Office is the leading responsible department for the implementation of LBMA due diligence management system of Yunnan Dianjin Investment Co., Ltd., which is responsible for the development and guidance of due diligence management in all business links of the Company and be set in the Marketing Department. Its main responsibilities are to: formulate due diligence management policy, system, process and work plan for gold procurement of the Company; be responsible for implementing for gold procurement due diligence management structure and guiding, coordinating and reporting

on conditions such as risk assessment, response and monitoring; take charge of organizing the gold procurement due diligence management knowledge learning and professional training of the Company; assist the management team of the Company to hold due diligence management meetings, discuss major risk issues, implement resolutions of the company, supervise and inspect the implementation of the subordinate departments, and conduct assessment.

尽责管理小组及合规专员，各部门、车间主要负责人为本单位的第一责任人。尽责管理小组职责：执行本部门及专业领域黄金采购尽责管理政策；每年年底组织调查、识别、分析和评价本部门及相关专业领域的风险，并对风险信息质量进行审核；每年年底上报本部门及相关专业领域识别的重大风险：本部门为主要风险责任部门时，牵头所有风险相关单位，共同制定可行的风险应对方案；及时将日常工作中发现的供应商黄金采购尽责管理问题，报送公司黄金采购尽责管理办公室。

For the Due Diligence Management Working Group and Compliance Officers, the person in charge of each department and workshop is the first person in charge of the unit. Responsibilities for Due Diligence Management Working Group are as follows: Carry out the due diligence management policy for gold procurement in the department and professional filed; Organize investigation, identification, analysis and evaluation of risks in the department and related professional fields at the end of each year, and review the risk information quality. Report the

significant risks identified by the department and related professional fields at the end of each year; Lead all risk-related units to jointly develop feasible risk response plans when the department is the main risk responsible department; Report the gold procurement due diligence management problems of suppliers found in daily work timely to the Gold Procurement Due Diligence Management Office of the Company.

1. 强有力的内部追溯体系

1 Strong internal traceability system

我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《供应商社会承诺书》，承诺原料合法合规，符合《云南滇金投资有限公司供应链管理政策》要求。

Our company will carry out due diligence on all suppliers and fill in KYC questionnaires. The contract should be signed and the supplier is required to issue a *Suppliers' Social Responsibility Commitment Letter* to promise that the raw materials are legal and compliant and comply with requirements of *Supply Chain Management Policy Of Yunnan Dianjin Investment Co., Ltd.* after the due diligence is completed.

3.1 供应链可追溯体系

3.1 Supply chain traceability system

公司建立了一套供应链可追溯体系，每一批移交云南滇金投资有限公司的原料均有台账记录，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，并通过上海黄金交易所进行销售。

The Company established a supply chain traceability system, so that every batch of raw materials transferred to Yunnan Dianjin Investment Co., Ltd. are recorded in the ledger, including supplier name, delivery date, delivery weight, fineness, etc. Each batch of ex-warehouse standard gold ingot should be assigned a unique number and recorded in the ex-warehouse ledger, including the ex-warehouse date and ex-warehouse weight, etc., and sold through the Shanghai Gold Exchange.

3.2 维护资料

3.2 Data maintenance

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、环保相关等资料。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 年以上。

Our company will collect data such as supplier business license, qualification verification data, KYC survey form, environment protection related information before the business begins. Related records such as delivery sheet, laboratory sheet, settlement sheet and bank transfer should be kept for more than 5 years.

3.3 培训

3.3 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员对供应链尽职调查管理的要求、内容以及 LBMA 负责任黄金指南进行培训，确保供应链尽职调查管理工作落到实处。2021 年我公司共开展了 4 次 LBMA 相关内容的培训

工作，并由学员填写了培训效果反馈表，整体培训效果非常良好。

The Company incorporates supply chain due diligence management training into the annual training plan of the Company every year, and organizes key positions in the Company and Compliance Officers to carry out training on requirements and contents for supply chain due diligence management and LBMA Responsible Gold Guidance to ensure the implementation of supply chain due diligence management. Our Company has carried out a total of 4 times of LBMA related training in 2021. Training effect feedback forms were filled by trainee, and the overall training effect is well.

3.4 合规机构

3.4 Compliance Agencies

公司设置了尽责管理小组及合规专员，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。

Due Diligence Management Working Group and Compliance Officers are set by the Company, which are in charge of all matters related to supply chain due diligence management. Especially, it is required to be responsible for reviewing supply chain due diligence, assessing the adequacy of due diligence, and collecting additional documents or information if necessary. The implementation for corresponding actions

within the high risk supply chain or transaction should be ensured. It is required to take charge of staff training for responsible supply chain, preparing and updating supply chain policy, and providing appropriate information to senior management to carry out their responsibilities.

3.5 通过官方银行渠道付款

3.5 Payment through official bank channels

公司在支付货款时，由营销部发起资金支付程序，由财务部审核、经营班子审批后，通过公司基本户所在的银行网上付款，并打印银行回单作为凭证附件保留。

At the time of paying for the goods by the Company, the Business Department shall initiate the payment procedure, reviewed by Finance Department and be approved by senior management, then pay online through the bank where the Company's basic account is located, and print the bank receipt as a voucher attachment for preservation.

3. 强化合作，协助黄金供应交易方建立尽职调查能力

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

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》并扩展至环境和可持续性责任的供应商。

The Company encouraged to build long-term relationships based on trust and mutual recognition with suppliers, particularly those that comply with the *OECD Due Diligence Guidance for Responsible Supply Chains of*

Minerals from Conflict-Affected and High-Risk Areas and extend to environmental and sustainability responsibilities.

公司所有供应商都签署《供应商社会责任承诺书》，承诺黄金来源合法合规，拒绝来自 LBMA 规定的高风险区域。矿山类型的供应商需提供采矿许可证，冶炼类型供应商需提供原产地证或报关单。所有供应商销售给我公司的黄金均要提供合规的发票，通此标准，对供应商进行了筛选，甄选出低风险供应商，并规避税务风险。

All of the Company's suppliers have signed the *Social Commitment of Supplier*, promising that the gold source is legal and compliant and refusing the gold from high-risk areas indicated by LBMA. Suppliers of all mine types shall provide mining licenses, all smelting type supplier shall provide certificate of origin or Custom Declaration Form. All suppliers must provide compliant invoices, and base on this standard, screen suppliers and get low risk suppliers to avoid tax risks.

4. 建立机密申诉机制

5. Establish a confidential appeal mechanism

公司利用云金集团官网网址：<https://www.ygmng.net/>，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，对举报人信息保密，在整个申诉过程中保护了申诉人的隐私，杜绝任何行为的打击报复。

The Company uses the official website of Yunnan Gold & Mineral Group Co., Ltd <https://www.ygmng.net/> to publish telephone and e-mail and allow employees and external stakeholders to express their

concerns about the supply chain or any newly identified risks. Meanwhile, the Company protects employees' privacy throughout the appeal process and keep the informant's information confidential to further eliminate attack and retaliation in the form of any behavior.

2021 年我公司未接到员工和外部利益相关者的申诉。

We have not received any complaint from employees and external stakeholders in 2021.

第二步 识别及评估供应链风险

Step 2 Identify and assess risk in the supply chain

合规声明与要求:

Compliance Statement with Requirement:

我公司已经充分遵守第 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 负责任黄金指南第二步“识别及评估供应链风险”的要求,制定《供应链风险评估表》,明确了高风险供应链的判定标准,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 followed the requirements of Step 2 of the LBMA Responsible Gold Guidance, “identify and assess risk in the supply chain”. The Company formulated the judgment criteria of high-risk supply chain and stipulated the treatment procedures for the identified

risks and completed the full identification and evaluation of the risks in the supply chain. So far, no high-risk supply chain has been found.

2. 评估供应链风险

2. Assess risk in the supply chain

2.1 供应链调查

2.1 Investigation of the supply chain

公司通过以下措施对供应链进行尽职调查：

The company conducts the due diligence through the following measures:

- (1) 资质验证。黄金冶炼公司对于所有供应商均进行供应链的尽职管理调查，填写 KYC 问卷，在进行合作前要求合作方提供符合 LBMA 供应商要求的相关资质证明文件，

(1) Verify the qualification. In terms of all suppliers, the Company conducts the due diligence management and investigation of the supply chain, fill KYC questionnaire. Before the cooperation, the cooperation party should provide the relevant qualification documents.

(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拒绝合作。

(2) Establish the files of suppliers. The specific investigation should be conducted for the basic information of suppliers, the

shareholder information, the types and places of origin of the provided raw materials, the types of planned refined precious metals, the settlement means with suppliers, the general situation of suppliers and other information. In addition, the investigation of supply chain should be extended to the upstream of suppliers as much as possible to finally determine the risk grade. In terms of suppliers involving high risk standard, the cooperation should be terminated.

(3) 建立原料台账。对供应商每批次来料的原料类型、移交日期、重量、成色、货款支付记录进行登记。

(3) Establish the register book of incoming materials. Conduct the investigation and registration on the date, weight, the source of raw materials, major upstream suppliers of the batch of incoming materials from suppliers.

(4) 持续对供应商信息进行追踪调查。充分发挥网络作用，利用天眼查、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。2021 年我公司对所有供应商合计 20 家进行了专项尽职调查，内容包括：供应商概况、资质信息、来料类型及、上游供应商名单、原料产地及品种等，所有供应商追踪到最终受益人，并逐一与《供应链风险评估表》的标准进行比对，所有供应商及其最终受益人均不涉及《供应链风险评估表》里内容，商业关系风险等级评定均为不高。

(4) It is required to continuously track and invest supplier information. The role of the network should be given full play, and websites such as

TianYanCha, Chia Trial Online and IPE should be used to check the qualification, trust-breaking, litigation and punishment conditions of suppliers. Our Company conducted special due diligence on 20 suppliers in total in 2021, including supplier profile, qualification information, incoming material types and , upstream supplier list, raw material origin and variety, etc. All suppliers should be tracked to the final beneficiaries and compared against the criteria in the *Supply Chain Risk Assessment Form* one by one. All suppliers and their final beneficiaries should not be involved in the contents in the *Supply Chain Risk Assessment Form*, and the business relationship risk rating should be low.

(5) 建立客户专项调研报告工作流程。我公司将《云南滇金投资有限公司供应链管理政策》逐一传达给了供应商，并明确告知供应商认真研读，以保证双方合作的顺利开展

(5) Establish work procedures of special investigation report of clients. We explained *Supply Chain Management policy of Yunnan Dianjin Investment Co., Ltd* to suppliers. In addition, suppliers are required to read the policies carefully to ensure the cooperation smoothly.

2.2 高风险供应链

2.2 Supply chain of high risk

根据 LBMA 和 OECD 相关规定，结合公司实际情况，特规定如下高风险供应链评判标准：

In accordance with the relevant provisions of LBMA and OECD and the actual situation of the company, the following evaluation criteria of

high-risk supply chain are specified:

(1) 矿产金或再生金来源于、中转或者运经冲突影响或侵犯人权高风险地区；

(1) Mined or recycled gold originates from, is transferred or is transported through high-risk areas influenced by conflicts or infringing human rights;

(2) 矿产金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) It is declared that mined gold originates from a country with limited known reserves, limited resources or limited estimated output;

(3) 再生金来源于已知的冲突影响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 originates from known high-risk areas influenced by conflicts or infringing human rights, or it is reasonable to suspect that it is transferred through the area;

(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 companies in the supply chain or other known upstream companies are located in a country with 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) The benefit owners of the companies in the supply chain or other known upstream companies are politically sensitive persons;

(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) The companies in the supply chain or other known upstream companies actively participate in high-risk commercial activities, such as weapons, gambling, bookmaking, antiques or works of art, diamonds, religion and religious leaders;

(7) 矿产金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) Mined gold originates from the small mines with incomplete domestic procedures and illegal mining and mining gold originates from manual mining;

(8) 矿产金或再生金利用汞生产而得；

(8) Mined or recycled gold is produced by using mercury;

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

(9) Mined or recycled gold originates from World Heritage Site or domestic natural and ecological reserves without conforming to the requirements of the environmental and sustainable development law.

(10) 信息源不完整，导致风险识别有效性不足。

(10) Incomplete information source leads to insufficient

effectiveness of risk identification

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。

When any one of the above evaluation criteria objectively exists, the supply chain will be identified as the high-risk supply chain.

2.3 高风险类别

2.3 Types of high risks

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，停止该交易并上报尽职管理委员会后报政府部门；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、再生金的冶炼，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。

The company formulated *Supply Chain Risk Mitigation Management Measures*. When the investigation findings of supply chain come from a high-risk area, the transaction should be terminated and it should be reported to the government departments after reporting it to the Due diligent management committee for approval. When the due diligence findings of supply chain may come from a high-risk area, the smelting of mined or recycled gold should be stopped at once until suppliers provide additional data or information that may prove that the high risk is unlikely to exist within 6 months. If the relevant evidence is still not provided within 6 months, the transaction should be terminated

immediately and the situation should be reported to the relevant personnel.

提供的资料包括：

The provided materials include:

- (1) 提供证明不存在有关矿产金、再生金提取、运输或贸易的系统性或广泛人权侵犯行为的政府性文件，如供应商所在地相关公安或商务部门出具的合法性证明等；
- (1) The government documents proving that systematic or widespread violations of human rights relevant to the extraction, transportation or trade of mineral or recycled gold, such as legal certificate issued by relevant public security or commercial departments at the place where suppliers are located and others;
- (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) The certificate documents proving that direct or indirect support for the illegal armed organization is not provided;
- (3) 提供并未通过欺诈掩盖矿产金或再生金的原产地证明文件，如相关政府部门出具的原产地证明；
- (3) The certificate documents of place of origin proving that mined or recycled gold is not covered through frauds;
- (4) 提供不存在洗钱或恐怖主义融资的证明文件；
- (4) The certificate documents proving that money laundering or terrorist financing does not exist
- (5) 提供国内小型矿山资质证明文件；

(5) Qualification certificate documents of domestic small mines;

(6) 提供能够证明开采黄金不是利用汞生产而得资料;

(6) Materials proving that mining gold is not produced by using mercury;

(7) 提供环境和可持续发展相关方针政策、制度文件以及通过有关部门环评报告;

(7) Relevant policies and system documents to environment and sustainable development and the report through EIA of relevant departments;

2021 年我公司通过《供应链风险评估表》对所有供应商进行评估后, 评估结果商业关系风险等级均为不高。

We have conducted assessment on all suppliers through *Supply Chain Risk Assessment Form* and no high risks have been found.

3. 向高级管理层报告风险评估

3. Report risk assessment to senior management

公司建立风险评估报告制度, 每年尽责管理小组及合规专员对供应商进行调查, 若调查发现供应商原料有来自高风险区域, 被评估为高风险供应链时, 将停止该交易并上报尽职管理委员会审批后报政府部门。

We have established a risk assessment report system. The Compliance Officers are responsible for reporting the due diligence work of the department to the Compliance Risk Officer in case that any supply chain is found to come from a high-risk area and is assessed as a high-risk supply chain through supply chain due diligence, the transaction will be

stopped and reported to the Due diligence management committee for approval and then report to the government department.

第三步 设计并实施策略来应对已识别的风险

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

合规声明与要求:

Compliance Statement with Requirement:

我们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。

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。2021 年未发现高风险供应链，因此未采取供应链风险减缓措施。

We have strictly complied with requirements under Step 3 “Design and implement a strategy to respond to identified risks” of LBMA Responsible Gold Guidance. We have not found any high risk supply chain in 2021, so no supply chain risk mitigation measures have been 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。

We have developed the *Supply Chain Risk Mitigation Management Measures* for document control management, established risk assessment standards and procedures. We have made risk mitigation strategies and determined the treatment for violations found during supplier evaluation and daily business development. We have normalized procedures for dealing with high-risk behaviors of suppliers and have defined the responsibilities of organizations and personnel at all levels during due diligence management.

第四步 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。

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。

We have strictly complied with requirements under Step 4 “Arrange for an independent third-party audit of the refiner due diligence” of LBMA Responsible Gold Guidance.

自 2010 年开始, 公司每年均聘请会计师事务所进行财务审计,

并出具审计报告。2018-2020 年聘请了致同会计师事务所（特殊普通合伙）云南分所进行审计，2021 年聘请了中审亚太会计师事务所（特殊普通合伙）云南分所进行审计。

We have engaged CPA to carry out financial audit annually since 2010. During 2018 to 2020, we engaged Grant Thornton to carry out financial audit and in 2021 we engaged China Audit Asia Pacific Certified Public Accountants LLP to carry out financial audit.

自 2021 年起，聘请 LBMA 认可的第三方审计机构 RCS 对我公司进行尽职调查审计。

We have appointed the LBMA third-party auditor of RCS Global to carry out audit for supply chain due diligence since 2021.

第五步 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:

我公司已经充分遵守第 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 黄金责任指南第五步“供应链尽职调查年度报告”的要求，每年向 RCS 审计机构提交年度合规报告。

We have strictly complied with requirements under Step 5 “Report on supply chain due diligence” of LBMA Responsible Gold Guidance and submit annual compliance report to RCS Global every year.

四、管理结论

IV. Management conclusion

综上所述，在报告年度截至 2021 年 12 月 31 日的财年内，根据《伦敦金银市场协会（LBMA）可靠黄金指导原则》的要求，云南滇金投资有限公司实施了有效的管理制度、程序、流程和实践。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）可靠黄金指导原则》的管理人员。

In conclusion, in the financial year ended December 31, 2020, Yunnan Dianjin Investment Co., Ltd. has implemented effective management systems, procedures, processes and practices in accordance with the *LBMA Responsible Gold Guidance*. We will be committed to continuous improvement and any corrective actions will be monitored internally on a regular basis. The plan of any corrective actions will be communicated to the LBMA executing agency separately and the management of *LBMA Responsible Gold Guidance*.

五、其他报告批注

V. Other report comments

如果本报告用户希望就本报告向云南滇金投资有限公司进行任何反馈，则可以通过 122743026@qq.com 联系企业相关部门，联系人：徐波，电话：0871-63806159。

If users of this report wish to provide any feedback to Yunnan Dianjin Investment Co., Ltd. with respect to this report, feel free to

contact our relevant departments by E-mail 122743026@qq.com, contact

person: Yu Bo, Tel: 0871-63806159