

云南滇金投资有限公司
Yunnan Dianjin Investment Co., Ltd.
2020 年度供应链尽职管理合规报告
2020 Supply Chain Due Diligence
Management Compliance Report



2021 年 2 月 1 日
February 1, 2021

公司名称：云南滇金投资有限公司

Company name: Yunnan Dianjin Investment Co., Ltd.

位置：云南省昆明市东郊白沙河

Address: East Suburb of Kunming City, Yunnan Province

年终报告：2020 年度供应链尽职管理合规报告

Year-end report: 2020 Supply Chain Due Diligence Management
Compliance Report

报告日期：2021 年 2 月 1 日

Date of report: February 1, 2021

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

云南黄金矿业集团股份有限公司成立于 2001 年，属国有控股的混合所有制股份企业，实际控制人为云南省地质矿产勘查开发局。主要经营范围有矿产资源勘查、开采、选冶，矿产品、矿业权经营，是云南省最大的黄金生产企业。通过多年艰苦奋斗，云金集团已发展成

为全国西部地区黄金行业的领军者和国内黄金行业的重要参与者，在全国黄金行业综合排名第五位。

Established in 2001, Yunnan Gold & Mineral Group Co., Ltd. is a state-controlled mixed-ownership joint-stock enterprise with the actual controller Yunnan Bureau of Geology and Mineral Exploration and Development. It is provided with the main business scope involving mineral resources exploration, mining, dressing and smelting and smelting and operation of mineral products and mining rights and belongs to the largest gold production enterprise in Yunnan Province. After years of arduous struggles, Yunnan Gold & Mineral Group has evolved into a leader in the gold industry in West China and a crucial participant in the domestic gold industry, ranking fifth in the national gold industry.

云南滇金投资有限公司前身为建于 2004 年的昆明黄金提纯加工中心，于 2009 年 5 月 18 日正式成立的国有企业，是云南黄金矿业集团股份有限公司旗下全资子公司，注册资本 1.5 亿元，目前公司有员工 68 人。目前是昆明市工业企业产值贡献前 5 企业。“滇金”金锭从获得上海黄金交易所认证后，已累计生产入库黄金 400 吨。专业从事黄金、白银的解吸、提纯、深加工、交易、销售。主导产品国标 1、2 号金锭，国标 1 号银锭。生产“滇金”、“富滇”品牌系列金条制品。拥有高温高压无氰解吸载金炭工艺、王水法二次还原提纯精炼黄金工艺、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。

Kunming Gold Purification and Processing Center is the predecessor to

Yunnan Dianjin Investment Co., Ltd. that was built in 2004. Yunnan Dianjin Investment Co., Ltd. is a state-owned enterprise that is officially established on May 18, 2009 and is a wholly-owned subsidiary of Yunnan Gold & Mineral Group Co., Ltd., with a registered capital of RMB 150 million. It has 68 employees and is regarded as one of the top 5 enterprises contributing to the output value of industrial enterprises in Kunming City. After obtaining the certification by Shanghai Gold Exchange, the “Dianjin” standard gold ingot accumulated 400 tons of gold for production and warehousing. Yunnan Dianjin Investment Co., Ltd. is mainly engaged in desorption, purification, deep processing, trading and sales of gold and silver and produces the leading products, such as National Standard No. 1 and 2 gold ingots and National Standard No. 1 silver ingot. Besides, it produces a series of gold bar products of “Dianjin” and “Fudian” brands. It is equipped with a high-temperature and high-pressure cyanide-free desorption gold-loaded carbon process, secondary reduction and purification gold process by aqua regia, 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集团内各大矿山自产金和从社会中收购的合质金，所有供应商均为低风险供应商。

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的供应链调查，要求所有供应商提供的原料来源合法、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《黄金白银供应链尽职调查规则》，规则包括黄金供应链尽职调查规则适用范围、黄金供应链公司内部组织架构及责任、高风险黄金供应链评判标准、黄金供应链尽职调查管理制度、黄金供应链交易监控、黄金供应链尽职调查文件记录保存、黄金供应链尽职培训、黄金供应链违规上报通讯机制等，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，出台《黄金白银供应商管理政策》，对该政策进行公布，网址为 https://www.ygm.net/154/230/content_1220.html。

The company adopted and issued the *Gold and Silver Supply Chains Due Diligence Rules* which includes the scope of application of the Gold Supply Chains Due Diligence Rules, the organizational structure and responsibilities for the gold supply chain, the evaluation criteria of high-risk gold supply chain, the due diligence management system, the transaction monitoring, the preservation of due diligence documents and records, due diligence training and violation reporting communication mechanism of the gold supply chain, etc. 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. The *Gold and Silver Supplier Management Policy* was issued and published at the website

https://www.ygm.net/154/230/content_1220.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，确保矿产金、再生金来源符合 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，发布《关于设立黄金供应链尽职管理组织机构的通知》，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。

The Company has established an internal management system and issued the *Notice on the Establishment of Due Diligence Management Organization of Gold Supply Chain* to define the management, roles and

responsibilities, internal audit and communication according to the issued policies and carry out senior management review.

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《供应链尽职调查管理办法》《供应链尽职调查政策》《供应链风险减缓管理办法》《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 Due Diligence Management Measures*, *Supply Chain Due Diligence Policy*, *Supply Chain Risk Mitigation Management Measures* and *Supply Chain Anti-Money Laundering Policy*, 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 will be 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

公司设置合规总监、合规风险专员、合规专员。

The Company has appointed the Compliance Director, Risk Compliance Officer and Compliance Officer.

合规总监由公司副总经理、总法律顾问担任，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 the Deputy General Manager and General Legal Adviser of the Company and is responsible for the supply chain due diligence, establishment and improvement of the supply chain due diligence management system, supervision of the supply chain due diligence process, coordination and handling of abnormalities in the supply chain due diligence and approval of the compliance report.

合规风险官设在财务部，由财务部负责人担任，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。

The Compliance Risk Officer works for the Finance Department and is the person in charge of the Finance Department. The Compliance Risk Officer is responsible for the formulation and updating of the supply chain due diligence policies and systems, development of the evaluation standards of high-risk supply chain and implementation of the supply chain due diligence measures, the guidance, coordination and reporting of

risk assessment, response and implementation conditions of the Company, supervision and inspection of the implementation conditions of all departments, reporting of abnormalities in supply chain due diligence and the organization of training.

合规专员由营销部、生产部、安保部、财务部、综合部指派，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。

Designated by the Marketing Department, Production Department, Security Department, Finance Department and Comprehensive Department respectively, the Compliance Officers are responsible for the strict implementation of the supply chain due diligence measures and high-risk supply chain evaluation criteria, collection and preservation of sufficient supply chain supporting documents, establishment of supplier due diligence archives and regular on-site investigation on important suppliers.

3.强有力的内部追溯体系

3. Strong internal traceability system

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编号。

The Company 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 number to each batch of products.

3.1 供应链可追溯体系

3.1 Supply chain traceability system

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；供应商送的每一批来料，都有来料验收单，表明产品类型、熔前熔后重量、预计品位，验收人员和供应商签字确认；熔炼取样化验，最后形成标准金，分配唯一编号，通过上海黄金交易所进行交易。

The credit investigation will be implemented for all suppliers. After the credit investigation is passed, the contract and social commitment of supplier will be signed to promise that the raw materials are legal and in line with LBMA due diligence policy. Each batch of incoming materials sent by suppliers shall be provided with an incoming material acceptance sheet indicating the product type, weight before and after melting and expected grade, which shall be signed by the acceptance personnel and suppliers for confirmation. The smelting, sampling and testing shall be carried out for each batch of incoming materials, finally forming standard gold and assigning a unique number and trade through Shanghai Gold Exchange.

3.2 维护资料

3.2 Maintenance documents

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、许可证、供应商尽职调查表、供应商溯源资料（供应商内部利益关系、供应商组织构架、供应商最终受益人等）、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。

Before the implementation of business, relevant records such as ID card, identity verification data, business license, qualification verification data, license, supplier due diligence questionnaire, supplier traceability data (supplier's internal interest relationship, supplier organization structure, supplier's ultimate beneficiary, etc.), acceptance sheet, test sheet and settlement sheet of each batch of products shall 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 负责任的黄金指南进行培训，确保供应链尽职调查管理工作落到实处，2020 年度公司开展培训 2 次，其中，2020 年 6 月 30 日，对黄金供应链尽职政策及管理体系进行系统化培训，对其中的疑点、难点进行现场解答，同时安排相关工作。2020 年 3 月 2 日供应商尽职调查会议，安排做好供应商尽职调查，安排对审计报告进行英文翻译。

Every year, the Company incorporates the supply chain due diligence management training into the Company's annual training plan and organizes key positions and compliance officers of the Company to accept the training about the requirements and contents of supply chain due diligence management and LBMA Responsible Gold Guidance to

ensure the implementation of supply chain due diligence management. In 2020, the Company carried out such training twice. On June 30, 2020, the systematical training about the gold supply chain due diligence policy and management system was carried out to answer the doubts and difficulties on the site and arrange relevant work at the same time. On March 2, 2020, the supplier due diligence meeting was held to arrange the supplier due diligence and perform the English translation of the audit report.

3.4 合规专员

3.4 Compliance Officer

公司指定营销部负责人为合规专员，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。

The Company appoints the person in charge of the Marketing Department as the Compliance Officer to be responsible for all matters related to the supply chain due diligence management. In particular, the Compliance Officer is responsible for the review of the supply chain due diligence, evaluation of the adequacy of the due diligence and collection of additional documents or information as necessary, the guarantee that appropriate actions are implemented within high-risk supply chains or transactions, the employee training on the responsible supply chain, the preparation and updating of supply chain policies and the supply of senior

management with appropriate information for performing 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，由业务部门发起资金事项联签程序，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 joint signing procedure for capital matters and pay online through the bank where the Company's basic account is located, and print the bank receipt as a voucher attachment for preservation.

4. 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，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。

All of the Company's suppliers shall sign the *Social Commitment of Supplier*, promising that the gold source is legal and compliant and refusing the gold from high-risk areas in LBMA. Suppliers of all mine types shall provide mining licenses. For the major clients related to the sales of the Company, the invoices of their downstream clients shall be recorded to avoid false invoice risks.

5.建立机密申诉机制

5. Establish a confidential appeal mechanism

公司利用各类平台，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，网址为 https://www.ygmng.net/154/230/content_1220.html。

The Company use various platforms 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. The relevant website is https://www.ygmng.net/154/230/content_1220.html.

第二步 供应链风险的识别与评估

Step 2 Identify and assess risk in the supply chain

合规声明与要求:

Compliance Statement with Requirement:

我们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 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 followed the requirements of Step 2 of the LBMA Responsible Gold Guidance and Responsible Silver 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.

1.识别供应链风险

1. Identify supply chain 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》并扩展至环境和可持续性责任,黄金冶炼公司识别相关风险,密切关注来自侵犯人权、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，以及用于贿赂、洗钱、恐怖主义融资等行为的黄金。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。

According to the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and the extended environmental and sustainability responsibilities, Gold Smelting Company identified relevant risks and paid close attention to gold from the places involving human rights violation, armed conflict, illegal mining, exploitation and utilization of mercury and world heritage sites and the gold regarding bribery, money laundering, terrorist financing and other acts. The Company established supplier archives for each supplier and conducted an investigation according to their companies' risk statuses to further complete the establishment of supplier archives before signing contracts with them.

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，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、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。

(1) Verify the qualification. In terms of all suppliers, Gold Smelting Company conducts the due management and investigation of the supply chain. Before the cooperation, the cooperation party should provide the relevant qualification documents and the corporate clients should provide business licenses. In addition, the individual clients are required to provide the copy of the identity card and the mine clients should also provide mining licenses and EIA certification and pay attention to wearing labor protection supplies by miners, health and safety transactions and occupational disease examinations.

(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 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 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) 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、白银来料量前三名进行专项尽职调查，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 work procedures of annual investigation report of suppliers. Conduct special due diligence on the top three annual volumes of incoming materials of gold and silver in addition to banks, forming annual investigation report of suppliers. The contents include the general situation of suppliers, the qualification information, the types and proportions of incoming materials, the general situation and the list of upstream suppliers, places of origin and types of raw materials, whether there is foreign gold and others.

(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，向供应商传达黄金冶炼公司尽职管理政策，并要求其

在政策上签字。

(5) Establish work procedures of special investigation report of clients.

When visiting clients, the source of raw materials should be traced and the responsible management policies of the company should be conveyed to suppliers. In addition, suppliers are required to sign on the policies.

(6) 同时协助委外加工厂进行尽职管理工作。对委外加工厂的原料来源进行追溯，帮助其建立供应商尽职管理体系。

(6) Assist outsourcing factory in due management at the same time. Trace the source of raw materials of outsourcing factory and help it to establish the due management system of suppliers.

(7) 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 30 公斤或累计购买超过 100 公斤的客户，一次性购买白银重量超过 2000 公斤或累计购买超过 5000 公斤的客户，进行产品去向尽职调查工作，充分发挥网络作用，利用天眼查、中国审判信息网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，对涉及高风险行为的供应商终止合作。

(7) Conduct due diligence on the whereabouts of products. In terms of sales business of gold and silver, the due diligence on the whereabouts of products should be conducted for clients with weight of single purchase of gold more than 30 kg or weight of accumulated purchase of gold more than 100 kg and clients with weight of single purchase of silver more than 2000 kg or weight of accumulated purchase of silver more than 5000 kg. Fully play the role of network and use Tianyancha, China Trial

Information Network and other websites to query the qualification, dishonesty, lawsuit and punishment of suppliers. In terms of suppliers involving high-risk behavior, the cooperation should be terminated.

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) 其他高风险情况。

(10) There exist other high-risk situations.

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。

When any one of the above evaluation criteria objectively exists, the supply chain will be identified as the high-risk supply chain. The Compliance Officers of the department should immediately prepare materials and report them to Risk Compliance Officers. Then Risk Compliance Officers should report them to the Compliance Director and the Compliance Director will approve them and take corresponding measures to terminate the transaction and eliminate risks.

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、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 Chief Compliance Officer 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;

2.4 交易监测

2.4 Transaction monitoring

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。

We have monitored all transactions to ensure that the transaction is consistent with the supply chain due diligence.

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。

We have reviewed the supply chain due diligence, and the result shows that each batch of incoming material has a unique number and the production is traceable. We keep complete receipts and documents related to all raw material procurement and warehousing, all weighing lists, moisture lists, grade lists, final statements, financial vouchers, etc. related to all gold concentrate that is put in storage, and all incoming material receipts, grade lists, final statements, financial vouchers, etc. related to all qualified gold and silver that is put in storage. The Marketing Department, Second Marketing Department, Quality Inspection Center and Financial Department are responsible for keeping relevant documents and sending them to the archives room regularly for file. The retention period is more than 5 years.

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，每月合规专员对部门尽职调查工作报告合规风险官。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 every month. 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 Compliance Director for approval and then 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、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。2020 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 and Silver Guidance.

公司制订了《供应链风险减缓管理办法》并作为文控管理，建立了风险评判标准和程序，按照供应链尽职调查系统的标准评估风险，积极识别黄金供应链中的风险，并及时将评估结果向指定的高级管理层报告，制定了风险缓解策略，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；汇报高级管理层，建立风险化解计划，与供应商及利益相关方沟通，监督风险缓解绩效及风险缓解计划实施后的风险再评估流程；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 assess risk and actively identify risk in the gold supply chain in accordance with the standards of the supply chain due diligence system, and timely report the assessment result to the designated senior management. We have made risk mitigation strategies and determined the treatment for violations found during supplier evaluation and daily business development. Risks will be reported to the senior management and a risk mitigation plan will be established. We will communicate with suppliers and stakeholders to monitor risk mitigation performance and risk re-assessment process after implementation of the risk mitigation plan. 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.

若供应链尽职调查的内容并未完全满足且来料为低风险，且被评估的供应商正在积极配合的情况下，该供应链尽职调查结果得出以下结论，则可继续该矿产金、原料金的冶炼，并要求供应商在 6 个月之内提供可证明其并不存在以下事项的额外数据或信息。若在 6 个月之内仍未提供相关证据，则需立即停止该交易并上报至有关人员：1. 并未完成供应链尽职调查全部内容；2. 向非法的公共或私人安全部队提供直接或间接支持；3. 贿赂或非欺诈原因而误导矿产金、再生金的原产地；4. 未向政府缴纳应缴税费。

If the content of the supply chain due diligence has not been fully completed with low-risk incoming materials and suppliers evaluated actively cooperate with the due diligence, the smelting of mined or recycled gold can be continued with the following supply chain due diligence results. In this case, the supplier is required to provide additional data or information to prove that no following events exist within 6 months. In case of any failure to provide relevant data within 6 months, the transaction must be stopped immediately and reported to relevant personnel: 1. The supply chain due diligence has not been completed; 2. Direct or indirect support is provided to illegal public or private security forces; 3. The origin of mined and recycled gold is wrong due to bribery or non-fraud reasons; 4. Taxes due are not paid to the

government.

疑似高风险来料后，对其进行单独登记、封存，进行上游溯源调查，细致排查相关风险，确认无风险后，告知精炼车间，对其原料熔炼，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。若为高风险来料则停止交易，并上报相关部门。

Suspected high-risk incoming materials will be separately registered and stored with a seal for upstream source investigation. After related risks are clean after careful investigation and risk-free after confirmation, the refining workshop will be told to smelt such incoming materials. During the whole process, these materials are not mixed with others. Their finished gold and silver products are separately numbered and stored in different areas in the storage room with other finished gold and silver products. For high-risk incoming materials, transactions will be stopped and reported to relevant departments.

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:

我们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、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。

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 and Silver Guidance.

2021 年公司安排对供应链尽职调查进行独立的第三方审核，明确了审核要求、标准、程序和周期性，通过 2020 年度尽职调查体系的审核，主要是 RCS 的 LBMA 第三方审计。并将向 LBMA 提交审核报告。We have arranged for an independent third-party audit for supply chain due diligence in 2021, and have defined the audit requirements, standards, procedures and period. The audit of the due diligence system in 2020 is carried out mainly by the LBMA third-party auditor of RCS Global. An audit report will be submitted to LBMA.

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、白银责任指南第五步“供应链尽职调查年度报告”的要求。

We have strictly complied with requirements under Step 5 “Report on supply chain due diligence” of LBMA Responsible Gold and Silver Guidance.

公司每年对上一年度的现场审核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，公示网址为 <https://www.ygmng.net/>。并形成供应链尽职调查报告，报告全面包括了精炼厂名称、遵守时段、在此期间为证明合规性所开展的工作概述、精炼商对本指南各步骤的遵守程度、关于遵守本指南的管理结论声明、列出报告期内的黄金原产国以及从各原产地收到的数量的附件等，明确了纠正措施计划。

We have published the summary and evaluation report of last year’s on-the-spot audit, certificate of due diligence management, supply chain management system and supply chain due diligence policy every year at the website of <https://www.ygmng.net/>. A supply chain due diligence report is formed to fully cover the refinery’s name and keeping time, job overview to prove compliance during this period, the degree of refiners to observe the Guidance in each step, the statement of management conclusion on the compliance with the Guidance, attachments with the gold country of origin during the reporting period and the amount received from the country of origin, etc. The corrective action plan is defined.

四、管理结论

IV. Management conclusion

综上所述，在报告年度截至 2020 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：张松柏，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: Zhang Songbai, Tel:0871-63806159.