



河南豫光金铅股份有限公司

HENAN YUGUANG GOLD AND LEAD CO., LTD

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Henan Yuguang Gold and Lead Co., Ltd.

LBMA RGG AND RSG

2024 Refiner's Compliance Report

(Published in January 2025)

河南豫光金铅股份有限公司

2024 年度精炼厂合规报告

(2024/01/01-2024/12/31)

Company Name:	河南豫光金铅股份有限公司 Henan Yuguang Gold and Lead Co., Ltd.
Location:	No.1 South Jingliang Street, Jiyuan City, Henan Province
Reporting year-end:	December 31th, 2024
Date of Report	January 13th , 2025
Senior management responsible for this report	Mr. Miao Hongqiang/Compliance Director

Part I 第一部分

Purpose 目的

根据 LBMA 发布的负责任黄金第 9 版以及负责任白银第 2 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。本报告总结了河南豫光金铅股份有限公司 2024 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 and the second edition of the Responsible Silver 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 2024 by Henan Yuguang Gold & Lead Co., Ltd Was summarized in the report.

Part II 第二部分

Company Profile 工厂概况

河南豫光金铅股份有限公司是河南豫光金铅集团有限责任公司控股子公司。河南豫光金铅集团有限责任公司始建于 1957 年,是河南济源市全资国有企业。河南豫光金铅股份有限公司 2002 年在上海证券交易所上市，是我国最大的铅冶炼企业、黄金白银、再生铅生产基地。

公司自主研发形成了一批国际领先拥有自主知识产权的核心技术，引领了行业发展，主持和参与了 100 余项国家及行业标准的制修订工作，获得科技成果 200 余项，专利 100 余项，2 项科技成果获“国家科技进步二等奖”。

公司的电铅、黄金白银、再生铅等多种主要产品生产规模位居行业领先地位，YUGUANG 商标获中国驰名商标，公司主导产品“豫光”牌电解铅、黄金白银、阴极铜分别在伦敦金属交易所（LME）、伦敦金银市场协会（LBMA）和上海期货交易所注册，YG 牌 A 级铜在上海交易所注册成功。公司主要产品生产能力为：铅、铜、黄金白银、硫酸等。

Henan Yuguang Gold & Lead Co., Ltd. is a holding subsidiary of Henan Yuguang Gold & Lead Group Co., Ltd. Which was founded in 1957, Henan Yuguang Gold & Lead Group Co., Ltd. is a state-owned enterprise in Jiyuan City, Henan Province. Henan Yuguang Gold & Lead Co., Ltd. was listed on the Shanghai Stock Exchange in 2002 and is the largest lead smelting enterprise, Gold, Silver and recycled lead production base in China.

The company's independent research and development has formed a group of internationally leading core technologies with independent intellectual property rights, leading the development of the industry, participated in the preparation and revision of more than 100 national and industry standards, obtained more than 200 scientific and technological achievements, and more than 100 patents, two scientific and technological achievements won the "National Science and Technology Progress Second Prize".

The production scale of the company's main products such as electric lead, Gold, Silver, recycled lead and other leading products ranks the industry's leading position. The YUGUANG trademark has won the well-known trademark in China. The company's leading products "Yuguang" brand electrolytic lead, Gold, Silver and copper cathode are respectively on the London Metal Exchange (LME), London Bullion Market Association (LBMA) and Shanghai Futures Exchange registered, YG brand A grade copper was successfully registered on the Shanghai Stock Exchange. The company's main product production capacity is: lead, copper, Gold, Silver, and sulfuric acid.

Part III 第三部分

Summary of compliance activities 合规活动总结

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黄金白银来源合法、合规。

The Company conducts supply chain due diligence for all suppliers, and requires their Gold, Silver to be legal and compliant.

第 1 步：建立强有力的公司管理体系

Step 1: Establish strong company management systems

合规声明：

我方已完全符合第1步：建立强有力的公司管理体系

Compliance Statement:

In the year ended Dec. 31st 2024, we have fully complied with the requirement of Step 1: Establish strong company management systems.

1.1 公司政策 Company Policy:

合规陈述:

2024 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、社会和治理（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《LBMA 负责任黄金白银指南》明确黄金白银供应链中需考虑的环境、社会和治理（ESG）因素。

In 2024, 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 2024 年度修订的第二版《黄金白银供应链尽职调查管理制度》于 2024 年 7 月通过了董事会批准，并在公司官网（<http://www.yggf.com.cn/cn/News.aspx?Typeld=10766>）上予以公布，确保了公司黄金（白银）尽责体系的有效运行。

The second edition of the "Gold (Silver) Supply Chain of Gold (Silver) Supply Chain of Gold (Silver)", which was revised in 2024, passed the board of directors in July 2024, and on the company's official website (<http://www.yggf.com.cn/cn/News.aspx?Typeld=10766>) 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 内部管理架构 Internal management structure

合规陈述：

公司根据《黄金白银供应链尽职调查规则》建立内部管理体系，明确了管理岗位以及对应的职责，公司设置了一名合规总监，一名合规经理，五名合规专员。公司的合规总监由苗红强（财务总监）担任，合规经理由杨新（进出口部部长）担任，原料部合规专员由王洪峰（原料采购员）担任，进出口部合规专员由张志宽（进出口业务员）担任，财务部合规专员由晁二文（银锭业务员）担任，冶炼厂合规专员由张敏（贵冶厂主管）担任，仓库合规专员由苗军（贵金属仓库主管）担任。

合规总监苗红强先生具有多年的企业管理工作经验，负责对黄金白银供应链负责任采购管理体系建设提供充足的人力、资金等资源，负责与供应商合作合同的审批，包含是否与高风险供应商合作，合同签订后对供应商的审查监督。

合规经理杨新先生熟知负责任供应链政策，有多年的国内外原料采购经验，协助高级管理人员全面负责黄金白银供应链尽职调查事务，对黄金白银供应链上的所有事情负责，确保公司整个黄金白银供应链符合风险管理规定，并能有效识别风险、规避风险。负责黄金白银供应链尽职调查及风险控制的培训，起草和更新黄金白银供应链政策，为高级管理者提供准确的信息。

合规专员原料部及进出口部负责原材料采购，确保矿粉、原材料供应的长期性、稳定性、安全性，并拒绝与高风险地区的相关企业、组织或国家合作。

财务的合规专员职责为完整保存所有客户的交易凭证。

冶炼厂合规专员组织黄金白银投料生产做好投料记录，在生产过程中采用封闭式流程，确保黄金白银生产加工的安全性与可追溯性。

仓库合规专员应按照客户进行分类作好黄金白银的入库、出库记录。

2024 年，豫光金铅严格执行《黄金白银供应链尽职调查管理体系》，对供应商进行风险尽职调查。对所有交易进行监控，以避免与高风险供应商建立关系。同时，合规官员对所有尽职调查发现的结果进行审查，所有的含金银物料采购合同都经过了合规总监的审批。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。

Compliance statement:

The company established an internal management system in accordance with the "Gold, Silver Supply Chain Due Diligence Rules", clarified management positions and corresponding responsibilities, and the company set up one compliance director, one compliance manager and five compliance specialists.

The company's compliance director is Mr. Miao Hongqiang (CFO), the compliance manager is Mr. Yang Xin (Director of import and Export Department), the raw materials department compliance officer is Mr. Wang Hongfeng(material purchaser), the import and export department compliance officer is Mr. Zhang Zhikuan (business manager), Mr. Chao Erwen (Gold, Silver business manager) is the compliance officer of the Finance Department, and Mr. Zhang Min(refiner plant manager) is the compliance officer of the refiner plant, Mr. Miao Jun is the compliance officer of warehouse.

Mr. Miao Hongqiang, compliance director, has many years of experience in enterprise management. He is responsible for providing sufficient human resources, capital and other resources for the construction of responsible procurement management system of Gold, Silver supply chain, approving cooperation contracts with suppliers, including whether to cooperate with high-risk suppliers, and reviewing and supervising suppliers after contract signing.

Mr. Yang Xin, the compliance Manager, is familiar with the policy of responsible supply chain and has many years of experience in purchasing raw materials at home and abroad. He assists senior management in fully taking charge of the due diligence affairs of Gold, Silver supply chain and is responsible for all

things in the Gold, Silver supply chain to ensure that the whole Gold, Silver supply chain of the company complies with risk management regulations and can effectively identify and avoid risks. Responsible for Gold, Silver supply chain due diligence and risk control training, draft and update Gold, Silver supply chain policy, provide accurate information to senior management.

Responsible for Gold, Silver supply chain due diligence and risk control training, drafting and updating Gold, Silver supply chain policies, and providing accurate information for senior managers. The Raw Materials Department and the Import and Export Department are responsible for the procurement of raw materials to ensure the long-term, stability and safety of the supply of mineral powder and raw materials, and refuse to cooperate with relevant enterprises, organizations or countries in high-risk areas.

The responsibility of the financial compliance officer is to keep all transaction documents intact. The smelter's compliance officer organizes the production of Gold, Silver input materials and makes a record of input materials. A closed process is used in the production process to ensure the safety and traceability of Gold, Silver production and processing.

The warehouse compliance officer shall classify and record Gold, Silver in and out according to the customer.

In 2024, Yuguang Group strictly implemented the "Gold, Silver Supply Chain Due Diligence Management System" and conducted risk due diligence on all suppliers. Monitor all transactions to avoid establishing relationships with high-risk suppliers. At the same time, compliance officers review all due diligence findings and results, and all Gold, Silver material procurement contracts have been approved by the compliance director. 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

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、物料类型、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 storage standard Gold, Silver ingots allocates the unique number, and there are records of the lending account, including the date of the outbound, the weight of the outbound, etc.

1.3.1.1 来料 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 recycled Gold, 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.

2024 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 2024 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, Silver ingots is allocated to 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 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

1.4Communication mechanism

1.4.1 培训

1.4.1Training

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。2024 年我公司共开展了一次供应链尽职管理体系相关内容的培训，培训现场通过互动提问的方式，整体达到良好的培训效果。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 2024, our company conducted two training training for the relevant content of the supply chain. Each training invited representatives of business cooperation units to participate in or video conferences on the spot. The training site used interactive questions to achieve good training results as a whole. Such training plans are designed to help relevant employees and suppliers understand the "Gold, Silver Supply Chain Division to Investigation and Management System" and related tool packages, and due management policies, systems, processes, and disclosure guidelines for training. The way to ask questions, the overall training effect is achieved.

1.4.2 内部沟通

1.4.2Internal communication

合规小组内部每年度会组织一次年度讨论，就当年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培训，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.

公司已建立机密申诉机制，公布利用官网平台（<http://www.yggf.com.cn/cn/News.aspx?TypeId=10766>）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。2024 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.yggf.com.cn/cn/News.aspx?TypeId=10766>) 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 2024, the Company did not receive complaints from employees and external stakeholders.

1.4.3 与供应商的沟通

1.4.3 Communication with suppliers

交易前，将公司负责任黄金、白银供应链管理政策及要求明确告知对方，向供应商发放 KYC 尽职调查表和承诺函，收集相应的资质与资料，后跟踪、收回尽职调查表，并进行风险评估，2024 年公司已完成政策及要求的传达，KYC 尽职调查问卷、承诺函的回收和风险评估工作。

Before the transaction, the company will clearly inform the other party of the company's responsible gold and silver supply chain management policies and requirements, issue KYC due diligence questionnaires and commitment letters to suppliers, collect relevant qualifications and information, track and recover due diligence questionnaires, and conduct risk assessment. By 2024, the company has completed the communication of policies and requirements. KYC due diligence questionnaire, commitment letter recovery and risk assessment.

第 2 步：识别和评估供应链风险

Step 2: Identify and assess risks in the supply chain

合规声明：

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。2024 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, 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 2024, 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的 ESG 因素，黄金白银冶炼公司识别相关风险，密切关注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白银，以及用于贿赂、洗钱、恐怖主义融资等行为的黄金白银。公司为每个供应商建立供应商档案，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, Silver smelting company identified relevant risks with close attention to Gold, Silver 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, 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—弗兰克法案第 1502 条、欧盟 CAHRA 名单、海德堡晴雨表或类似的指数、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, 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、中国执行信息公开网等网站对国内供应商资质情况、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，2024 年期间未出现高风险客户。

In the process of cooperation, understand and evaluate the dynamic business activities of suppliers, and continue to track and investigate the information of suppliers. Give full play to the role of the network, and use websites such as enterprise Chacha and China Implementation Information Disclosure Network to inquire about domestic suppliers' qualifications, breach of trust, litigation, and penalties. Our company has conducted special due diligence on all suppliers and no high-risk customers have emerged during 2024.

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，由合规经理进行汇总，报合规总监进行综合评审。

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.

年底，由合规风险官总结 2024 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。审批通过后，在公开网站上进行公示。2024 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。2024 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 2024, formulated a plan for the next year's work, and formed a compliance report. After being reviewed by the Compliance Director, it was publicized on the public website. During the 2024 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 2024 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》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 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政府认可的国际制裁名单、多德—弗兰克法案第 1502 条、欧盟 CAHRA 名单、海德堡晴雨表、脆弱国家指数或类似的指数、联合国人权事务高级专员办事处或同等机构、金融行动特别工作组（FATF）的报告（包括相关国家/地区报告）、关于高风险黄金白银中心/转运中心和高洗钱风险国家/地区的可靠市场情报。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, 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, Silver 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, Silver and Gold, 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，2024 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人是已知的洗钱者、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 2024, 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，2024 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 2024, 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

2024 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 2024, so no enhanced due diligence was triggered.

公司承诺如果触发高风险警示信号，从严控供应链风险的角度出发，公司会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、交易支付方式等强化尽职调查。

The company promises that if a high risk warning signal is triggered, from the perspective of strictly controlling supply chain risks, the company will conduct field inspections on suppliers with specific business locations, including strengthening due diligence on business type, material type, origin description, mode of transportation, number of upstream suppliers, transaction payment methods, etc.

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。2024 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 silver and Gold, Silver Guidance. No zero tolerance risk and high risk were not identified and assessed in 2024. 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，对由其原料生产的成品金银进行单独编号，并在金银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. Finished Gold, Silver produced from their raw materials were separately numbered, and stored in the vault in zones with other finished Gold, 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 2024 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 2024, 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

3.2.2Regular 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

3.3Periodic reports

公司建立风险评估报告制度，合规专员会定期对部门尽职调查工作报合规经理。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有关部门。2024 年公司对所有供应商进行了风险评估，合规经理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 reporting system, and the compliance specialist will report the due diligence work of the department to the compliance manager on a regular basis. When it was found in the supply 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 2024, 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：安排独立的第三方审计

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

合规声明：

我们完全符合第四步：安排独立的第三方审计

Compliance Statement:

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

合规陈述：

上一次审计时间为 2024 年 1 月，审核报告已经上传至我司官方网站

<http://www.yggf.com.cn/cn/News.aspx?Typeld=10766>。本年度我司按时编写了截至 2024 年 12 月 31 日的合规报告，请瑞盛咨询服务（深圳）有限公司进行合理鉴证。

Compliance statement:

The last audit was performed in Jan 2024, and the audit report has been uploaded to our official website <http://www.yggf.com.cn/cn/News.aspx?Typeld=10766>.

We have prepared the annual compliance report before December 31, 2024. And request Rui Sheng Consult Service (Shenzhen) Co., Ltd. for reasonable verification.

第 5 步：供应链尽职调查报告

Step 5: Report on supply chain due diligence

合规声明：

我们完全符合第五步：供应链尽职调查报告

Compliance Statement:

We have fully complied with Step 5: Report on supply chain due diligence

合规陈述：

我们的黄金白银供应链政策中列出了有关如何实施供应链尽职调查政策，程序，过程和控制以符合 LBMA 负责任黄金白银指南中特定要求的更多信息和具体细节，该政策可在公司网站 <http://www.yggf.com.cn/cn/News.aspx?Typeld=10766> 上找到。

Compliance statement:

Further information and specific details of how to perform due diligence systems for supplier chains, procedures, processes and controls have been implemented to align to the specific requirements in the LBMA Responsible Gold, Silver Guidance have been set out in our Gold, Silver supply chain policy, which is available on our company website <http://www.yggf.com.cn/cn/News.aspx?Typeld=10766>.

Part IV 第四部分

Conclusion 结论

管理层结论 Management conclusion

我司在截至 2024 年 12 月 31 日的报告年度报告中，实施了有效的管理系统，程序，流程和实践，

以符合 LBMA 负责任黄金白银指南的要求。

我司致力于持续改进，并且将定期对内部发现的所有纠正措施进行监控。持续满足 LBMA 负责任黄金白银指南的要求。

The company implemented effective management systems, procedures, processes and practices to conform to the requirements of the LBMA Responsible Gold, Silver Guidance, as explained above in Table 2, for the reporting year ended 31 December 2024.

The company is committed to continuous improvement, and any corrective actions identified will be monitored internally on a regular basis. Ensure that the management system continue meeting the requirements of the LBMA Responsible Siler Guidance.

其他 Other report comments

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