

# LBMA RGG 黄金风险减缓制度

## LBMA RGG Gold Risk Mitigation System

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# 1.引言

## 1. Introduction

### 1.1 范围和目的

#### 1.1 Scope and purpose

福建金玉德尚精炼科技有限公司为减缓黄金供应链中可能存在的风险，特制定该政策。

In order to mitigate the possible risks in the gold supply chain, Fujian Jinyudeshang Refinery Tech Co.,Ltd. has specially formulated the policy.

该政策适用于福建金玉德尚精炼科技有限公司，以及与福建金玉德尚精炼科技有限公司有黄金交易、黄金加工的所有黄金供应商、黄金相关合作伙伴。

The policy applies to Fujian Jinyudeshang Refinery Tech Co.,Ltd. and all gold suppliers and relevant partners related to Fujian Jinyudeshang Refinery Tech Co.,Ltd. concerning gold trading and processing.

### 1.2 主要风险综述

#### 1.2 Summary of main risks

AML-CFT：反洗钱-反恐怖主义融资

**AML-CFT:** Anti-Money Laundering - Combating the Financing of Terrorism.

Contribution to conflict：加剧冲突。加剧两方或者多方之间的导致侵

犯人权的武装冲突，冲突方可能包括政府、军队、有组织犯罪或恐怖主义团体。

Contribution to armed aggression between two or more parties which leads to human rights abuses. The parties in the conflict may include government, militia, organised criminals or terrorist groups.

Money laundering: 洗钱。洗钱是一种掩饰非法获得的金钱的来源的行为，根本上，这是一个使得犯罪收益变得合法的过程。这些金钱来源于多种犯罪行为，包括贩毒、贪污和其他种类的欺诈。洗钱的方法多种多样，有简有繁。

Money laundering is the practice of disguising the origins of illegally obtained money. Ultimately, it is the process by which the proceeds of crime are made to appear legitimate. The money involved can be generated by any number of criminal acts, including drug dealing, corruption and other types of fraud. The methods by which money may be laundered are varied and can range in sophistication from simple to complex.

Politically exposed person: 政治敏感人物。外国政治敏感人物是指现在或曾经被外国政府委以重要公职的个人，例如国家元首或者政府首脑、高级政客、高级政府官员、法庭或者军队官员、国企高管、重要政党官员。国内政治敏感人物是指现在或曾经在国内被委以重要公职的个人，例如国家元首或者政府首脑、高级政客、高级政府官员、法庭或者军队官员、国企高管、重要政党官员。现在或曾经被国际组织

委以重要职务的高级管理层成员，例如，董事、副董事和董事会成员或类似同等职责的职务。上述政治敏感人物的定义不包括中层或者更低层的个人。

*Foreign PEPs* are individuals who are or have been entrusted with prominent public functions by a foreign country, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials. *Domestic PEPs* are individuals who are or have been entrusted domestically with prominent public functions, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials. *Persons who are or have been entrusted with a prominent function by an international organisation* refers to members of senior management, i.e. directors, deputy directors and members of the board or equivalent functions. The definition of PEPs is not intended to cover middle-ranking or more junior individuals in the foregoing categories.

**Terrorism Financing:** 恐怖主义融资。恐怖主义融资包括为恐怖主义行为、恐怖主义分子和恐怖主义组织融资。

**Terrorism Financing:** terrorist financing includes the financing of terrorist acts, of terrorists and of terrorist organizations.

### 1.3 责任

### 1.3 Responsibility

由公司任命的合规风控官，对黄金供应链上的所有事情负责。

The Compliance Risk Control Officer appointed by the company should be responsible for all matters in the gold supply chain.

### 1.4 管理者

### 1.4 Manager

由合规风控官根据黄金供应链进行管理组织架构搭建，具体分工如下：

Organizational structure construction should be managed by the Compliance Risk Control Officer according to the gold supply chain, and specific division of labor is as follows:

序号 No.	职位 Position	姓名 Name	电话 Tel	邮箱 E-mail
1	合规风控官 Compliance Risk Control Officer	陈玲玲	0591-62199999-9077	chenlingling@decent9999.cn
2	交易部合规专员 Compliance Officer of Trading Department	陈华杉	0591-62199999-9076	chenhuashan@decent9999.cn
3	财务部合规专员 Compliance Officer of Financial Department	颜静雯	0591-62199999-9303	yanjingwen@decent9999.cn
4	运营中心合规专员 Compliance Officer of Operation Center	陈棉香	0591-62199999-9076	chenmianxiang@decent9999.cn
5	物流合规专员 Compliance Officer of Logistics	周丽娟	0591-62199999-9815	zhoulijuan@decent9999.cn
6	综合部合规专员	林淑婷	0591-62199999-9079	linshuting@decent9999.cn

	Compliance Officer of General Office			
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2.风险等级

2. Risk level

2.1 风险分值设定

2.1 Risk scores setting

根据《LBMA 负责任的黄金指南》对与福建金玉德尚精炼科技有黄金交易、黄金加工的所有黄金供应商、黄金相关合作伙伴进行以下风险等级分值设定。

All gold suppliers and relevant gold partners related to Fujian Jinyudeshang Refinery Tech Co.,Ltd. concerning gold trading and processing must receive the following risk level scores according to *LBMA Responsible Gold Guidance* .

风险等级分值

Risk Level Scores

序号 S/N	评估方 Assessed by	评估内容 Assessment content	分值 Score
1	商业交易方 (含银行) Business counterparty (including banks)	1.1 相关营业执照等 1.1 Relevant business license, etc.	6 分 6 points
		1.2 相关收益人 1.2 Relevant beneficiary	2 分 2 points
		1.3 收益人身份文件 1.3 Identity documents of the beneficiary	2 分 2 points
		1.4 相关商业关系 1.4 Relevant business relations	2 分 2 points
		1.5 财务状况 1.5 Financial conditions	2 分 2 points

		1.6 黄金源产地资料信息等 1.6 Gold origin data, etc.	6 分 6 points
2	矿场方 Minefields	2.1 证明合理和善意之努力识别黄金的产地来源 2.1 Proof showing the rationality of goodwill of efforts to identify the origin of gold	6 分 6 points
		2.2 采矿许可证 2.2 Mining permit	3 分 3 points
		2.3 进/出口黄金许可证 2.3 Gold import/export license	5 分 5 points
		2.4 采矿情况信息 2.4 Mining information	2 分 2 points
		2.5 开采能力的信息 2.5 Data related to mining capacity	2 分 2 points
3	回收金 (含自然人) Gold recovery (Including natural persons)	3.1 再生金供应商资质信息 3.1 Qualification information of recycled gold suppliers	6 分 6 points
		3.2 再生金供应商商业关系 3.2 Business relations of recycled gold suppliers	2 分 2 points
		3.3 再生金供应商黄金来源证明 3.3 Proof of origin of gold by recycled gold suppliers	4 分 4 points
		3.4 再生金供应商相关收益人背景情况描述等 3.4 Description of the relevant beneficiary's background information of recycled gold suppliers	4 分 4 points
		3.5 再生金供应商相关收益人身份文件 3.5 Relevant beneficiary's identity documents of recycled gold suppliers	4 分 4 points

## 2.2 终止风险分值界定

### 2.2 Termination risk scores definition

根据风险分值，公司对与福建金玉德尚精炼科技有限公司有黄金交易、黄金加工的所有黄金供应商、黄金相关合作伙伴达到以下分值，分别采取不同的风险终止办法。

According to the risk scores, the Company will take different risk termination approaches once all gold suppliers and relevant gold partners related to Fujian Jinyudeshang Refinery Tech Co.,Ltd. concerning gold trading and processing reach the following scores.

## 风险分级

### Risk Ranking

序号 S/N	风险等级 Risk level	风险值（R） Risk value (R)	控制要求 Control requirements
1	(i)低风险 (i) Low risk	$R \geq 6$ 分 $R \geq 6$ points	继续交易减少风险 Continue transactions to reduce risks
2	(ii)中风险 (ii) Medium risk	$2 \text{ 分} < R < 6 \text{ 分}$ $2 \text{ points} < R < 6 \text{ points}$	暂停交易减少风险 Suspend transactions to reduce risks
3	(iii)高风险 (iii) High risk	$R \leq 2$ 分 $R \leq 2$ points	停止交易摆脱风险 Cease transactions to reduce risks

### 3.风险减缓、监控和管理

### 3. Risk mitigation monitoring and management

#### 3.1 减缓控制

#### 3.1 Mitigation and control

所有公司内部黄金供应链相关工作人员如发现违规事项，应及时向所属板块合规专员进行邮件及电话报告，再由合规专员向合规风控官进行邮件及电话报告。

If all relevant staff in the gold supply chain of the company find violation behaviors and events, they should timely report to the Compliance Officers in the involved sector in E-mail or telephone form, and the Compliance Officer should report to the Compliance Risk Control Officer in E-mail or telephone form.

合规风控官根据风险等级判定采取何种风险控制办法，并开展风



险减缓制度。

What risk control measures to be adopted should be determined by the Compliance Risk Control Officer according to risk level, and the risk mitigation system should be carried out.

## **3.2 减缓制度**

### **3.2 Mitigation system**

3.2.1要求供应链中的每一个公司，提供可靠的独立来源的文件、数据或者信息来验证他们的身份。

3.2.1 Each company in the supply chain is required to provide reliable documents from independent sources, data or information to verify their identity.

3.2.2识别供应链中每一个公司的受益所有人。

3.2.2 Beneficial owner for each company in the supply chain should be identified.

3.2.3确定供应链中的每一个公司及他们的受益所有人不在任何政府的洗钱、诈骗或恐怖主义通缉名单上。

3.2.3 It should be ensured that each company and their beneficial owner are not on any wanted list of government for money laundering, fraud or terrorism.

3.2.4 获得公司商业和财务方面的详细情况，商业关系的目的和本意信息。

3.2.4 The details for business and finance condition of company, and

information about the purpose and intent of business relationship should be obtained.

3.2.5 对收集的信息，根据风险等级分值来确定风险。

3.2.5 The risk for collected information should be determined according to the risk level scores.

3.2.6 根据 3.2.5 的初步结果，邀请 LBMA 推荐的第三方审计机构再次进行黄金供应链尽职调查，并出具审计结果。

3.2.6 The third-party audit agency recommended by LBMA should be invited to conduct due diligence on the gold supply chain again based on the preliminary result of 3.2.5, and the audit result should be issued.

### 3.3 监控流程

#### 3.3 Monitoring process

公司合规专员对所有黄金供应商、黄金相关合作伙伴进行初步监控。监控信息需提交至合规风控官。再由合规风控官进行二次判定监控。

The preliminary monitoring for all gold suppliers and relevant gold partners should be carried out by Compliance Officer of the Company. The monitoring information should be submitted to the Compliance Risk Control Officer. The second decision monitoring should be carried out by the Compliance Risk Control Officer.

公司高级管理层通过风险评估，包括审批每一个评估为高风险的

供应链，并每年重新决定是否继续与之保持商业关系。

Senior management of the Company should be responsible for passing risk assessment, including the approval of each supply chain assessed as high risk, and re-determining whether to continue the business relationship annually.

### **3.4 监控办法**

#### **3.4 Monitoring methods**

每年所有黄金供应商、黄金相关合作伙伴，需提供以下证明，由公司审核，是否出现黄金供应链风险。

All gold suppliers and relevant gold partners should provide the following evidence, and the Company should be responsible for approving whether there is gold supply chain risk.

##### **3.4.1 回收金**

##### **3.4.1 Recycled Gold**

###### **3.4.1.1 再生金供应商资质信息**

###### **3.4.1.1 Qualification information of recycled gold suppliers**

###### **3.4.1.2 再生金供应商商业关系**

###### **3.4.1.2 Business relations of recycled gold suppliers**

###### **3.4.1.3 再生金供应商黄金来源证明**

###### **3.4.1.3 Proof of origin of gold by recycled gold suppliers**

###### **3.4.1.4 再生金供应商相关收益人背景情况描述等**

###### **3.4.1.4 Description of the relevant beneficiary's background information**

of recycled gold suppliers

3.4.1.5 再生金供应商相关收益人身份文件

3.4.1.5 Relevant beneficiary's identity documents of recycled gold suppliers

### **3.5 管理**

#### **3.5 Management**

对于公司有黄金交易、黄金加工的所有黄金供应商、黄金相关合作伙伴出现黄金供应链风险。依据风险等级，公司在管理中将采取以下办法。

For the gold supply chain risk to all gold suppliers and relevant gold partners, the company will adopt the following measures in management according to the risk level.

3.5.1 (i) 低风险

3.5.1 (i) Low risk

在继续合作的同时，公司给予有黄金交易、黄金加工的所有黄金供应商、黄金相关合作伙伴两周时间进行相关资料完善。

While the cooperation is continued, time of two weeks should be given to all gold suppliers and relevant gold partners to improve the relevant information.

3.5.2 (ii) 中风险

3.5.2 (ii) Medium risk

公司与有黄金交易、黄金加工的所有黄金供应商、黄金相关合作伙伴出现中风险时，进入减缓控制阶段，暂定交易。由公司内部审计及第三方审计合规后，方可再次进行交易。

When the medium risk occurs to the Company and all gold suppliers and relevant gold partners, the trading should be suspended and entered into the mitigation control phase. The trading should be carried out again only after the internal audit of the Company and third-party audit are complied.

### 3.5.3 (iii) 高风险

### 3.5.3 (iii) High risk

公司与有黄金交易、黄金加工的所有黄金供应商、黄金相关合作伙伴出现高风险时，进入减缓控制阶段，暂定交易。由公司内部开展审核及第三方审计。最后由公司高级管理层根据审计结果重新决定是否继续与之保持商业关系。

When the high risk occurs to the Company and all gold suppliers and relevant gold partners, the trading should be suspended and entered into the mitigation control phase. The internal audit of the Company and third-party audit should be carried out. Finally, senior management of the Company should be responsible for re-determining whether to continue the business relationship base on the audit result.

福建金玉德尚精炼科技有限公司

Fujian Jinyudeshang Refinery Tech Co.,Ltd.

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