

# 黄金供应链尽职调查管理政策

福建金玉德尚精炼科技有限公司

## **Gold Supply Chain Due Diligence Management Policy**

Fujian Jinyudeshang Refinery Technology Co., Ltd.

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福建金玉德尚精炼科技有限公司始终坚持可持续发展战略，我们意识到对供应商的选择和管理，特别是在黄金交易和采购关键原料方面，对可持续性的发展至关重要。为全面实施 OECD 关于在冲突地区及高危地区供应链尽职调查指导方针，推行 LBMA RGG 尽职管理体系，特制定本政策。

Fujian Jinyudeshang Refinery Technology Co., Ltd. adheres to a sustainable development strategy. We recognize that supplier selection and management, particularly in gold trading and procurement of key raw materials, are crucial for sustainable development. To fully implement the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas and the LBMA Responsible Gold Guidance (RGG) management system, this policy is hereby established.

我们认识到在受冲突影响和高风险区域从事矿产开采、贸易、处理、出口存在可能形成重大负面影响的风险，并认识到我们有尊重人权、不助长冲突的义务，我们承诺采纳并广泛推广如下受冲突影响和高风险区域矿石负责任采购政策，并将其纳入与供应商签订的合同和/或协议之中。

We recognize the risks of significant negative impacts associated with mining, trading, processing, and exporting minerals in conflict affected and high-risk areas, and acknowledge our obligation to respect human rights and avoid exacerbating conflicts. We commit to adopting and widely promoting the following responsible procurement policies for minerals in conflict affected and high-risk areas, and incorporating them into contracts and/or agreements with suppliers.

为保证我公司所有黄金物料的采购均合法，不与犯罪、武装冲突、侵犯人权有关，我公司对黄金供应商进行尽职调查。各供应商需遵守 LBMA RGG 管理体系的各项要求，向我公司提供的所有类型的黄金产品的来源均为合法，不从事任何会为冲突提供资助的活动，遵守联合国相关制裁决议，或者在适用情况下，遵守执行此类决议的国内法律。并且不涉及以下情况：

To ensure that all purchases of gold materials by our company are legal and not related to crime, armed conflict, or human rights violations, our company conducts due diligence on gold suppliers. All suppliers are required to comply with the requirements of the LBMA RGG management system, ensure that all types of gold products provided to our company are sourced legally, refrain from any activities that may provide funding for conflicts, comply with relevant United Nations sanctions resolutions, or, where applicable, comply with domestic laws implementing such resolutions. And it does not involve the following situations:

## 一、与矿产开采、运输、或贸易有关的严重侵权行为

### 1. Serious infringement related to mineral mining, transportation, or trade

在受冲突影响和高风险区域开展采购或经营活动时，我们既不会容忍也不会以任何方式获利于、帮助、协助或便利任何一方实施：

When conducting procurement or business activities in conflict-affected and

high-risk areas, we will neither tolerate nor in any way benefit from, assist, facilitate, or enable any party to commit:

- i) 任何形式的酷刑，残忍、不人道和有辱人格的待遇；  
i) Any form of torture, cruel, inhuman, or degrading treatment;
- ii) 任何形式的强迫或强制劳动。强迫或强制劳动是指以惩罚作为威胁榨取的任何个人的、并非该人自愿提供的劳动或服务；  
ii) Any form of forced or compulsory labor. Forced labor refers to any work or service extracted from an individual under threat of penalty, which the person has not offered voluntarily;
- iii) 最恶劣形式的童工；  
iii) The worst forms of child labor;
- iv) 其他严重侵犯和践踏人权的行爲，如普遍的性暴力行爲；  
iv) Other serious human rights violations, such as widespread sexual violence;
- v) 战争罪或其他严重违反国际人道主义法的行爲，反人类罪或种族灭绝罪。  
v) War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

## 二、对严重侵权行为的风险管理

### 2. Risk Management for Serious infringement

如果我们有合理理由认为该风险存在，即上游供应商正从实施第 1 条所规定的严重侵权行为的任何一方进行采购或与该方有关联，我们将立即中止或中断与该供应商的合作。

If we have reasonable grounds to believe that an upstream supplier is sourcing from or associated with any party involved in the serious violations outlined in Section 1, we will immediately suspend or terminate cooperation with that supplier.

## 三、关于直接或间接支持非国家武装团体

### 3. Direct or Indirect Support to Non-State Armed Groups

我们不会容忍任何通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供直接或间接的支持。这些“直接或间接的支持”包括且不限于从非国家武装团体或其关联方购买矿产，向其进行付款，或以其他方式为其提供后勤支援或设备等。这些武装团体或关联方：

We will not tolerate any direct or indirect support to non-state armed groups through mineral extraction, transportation, trade, processing, or export.

These "direct or indirect supports" include but are not limited to purchasing minerals from non-state armed groups or their affiliates, making payments to them, or providing logistical support or equipment to them in other ways. These armed groups

or affiliates:

“直接或间接的支持”包括且不限于：

"Direct or indirect support" includes but is not limited to:

1. 非法控制矿址，或以其他方式控制运输路线、矿产交易点以及供应链的上游行为主体；

1. Illegally controlling mining sites, transportation routes, mineral trading points, or upstream supply chain actors;

2. 在矿址入口、运输路线沿线或矿产交易点非法征税或者勒索钱财或矿产；

2. Illegally taxing or extorting money or minerals at mining sites, along transportation routes, or at trading points;

3. 对中间商、出口企业、或国际贸易者非法征税或勒索。

3. Illegally taxing or extorting intermediaries, exporters, or international traders.

#### 四、对向非国家武装团体提供直接或间接支持的风险管理

##### **4. Risk Management for Support to Non-State Armed Groups**

如果我们有理由认为，上游供应商从向非国家武装团体提供直接或间接支持的任何一方进行采购或与之存在关系，我们将立即中止或中断与该供应商的合作。

If we have reason to believe that an upstream supplier sources from or is associated with any party providing direct or indirect support to non-state armed groups, we will immediately suspend or terminate cooperation with that supplier.

#### 五、关于公共或私人安全武装

##### **5. Public or Private Security Forces**

1. 我们认可矿址及/或其周边地区以及/或运输道路沿线的公共或私人安全武装的作用仅是维护法治，包括保障人权、保护矿工、设备和设施安全、保护矿址或运输路线以使合法的开采和贸易不受干扰。

1. We acknowledge that the role of public or private security forces at or around mining sites or along transportation routes is solely to uphold the rule of law, including protecting human rights, miners, equipment, and facilities, and ensuring lawful mining and trade are not disrupted.

2. 在我们或我们供应链上的任何企业与公共或私人安全武装签订了合约的情况下，我们承诺或者将规定，在与这类安全武装进行合作的过程中将遵守《安全与人权自愿原则》的规定。尤其是，我们将会支持或采取措施运用筛查政策，确保已知的实施过严重侵犯人权行为的个人或安全武装单位不被录用。

2. If we or any entity in our supply chain contracts with public or private security forces, we commit to complying with the Voluntary Principles on Security and Human Rights. In particular, we will support or take measures to apply screening policies to ensure that individuals or security armed units known to have committed serious human rights violations are not recruited.

3. 我们将支持或采取措施与中央或地方政府、国际组织和民间社会组织开展合作，共同为如何提高公共安全武装安保费用的透明度、相称性和问责性找到可行的解决方案。

3. We will support or take measures to collaborate with central or local governments, international organizations, and civil society to improve transparency, proportionality, and accountability in public security expenditures.

4. 我们将支持或采取措施与当地政府、国际组织和民间社会组织开展互动，避免或最大限度地降低公共或私人安全武装驻扎在矿址给弱势群体带来的负面影响。尤其是对小作坊矿工的负面影响。

4. We will engage with local governments, international organizations, and civil society to minimize negative impacts of security forces on vulnerable groups near mining sites. Especially the negative impact on ASM.

## 六、对公共或私人安全武装的风险管理

### **6. Risk Management for Public or Private Security Forces**

如果我们发现在一定程度上存在此类风险，将根据企业在供应链上所处的具体位置，立即制定、采用和实施上游供应商及其他利益相关方风险管理计划。从而使第五步中所述的为公共或私人安全武装提供直接或间接支持的风险得到遏制或降低。如果风险管理计划实施六个月未起作用，我们将暂时停止或中断与上游供应商的合作。我们发现在一定程度上有可能存在有违上述行为的情况下，将采取同样的应对措施。

If we identify such risks, we will develop and implement risk management plans for upstream suppliers and stakeholders based on our position in the supply chain. Thus, the risk of providing direct or indirect support to public or private security forces as described in step five can be contained or reduced. If the risk management plan does not take effect after six months of implementation, we will temporarily suspend or interrupt our cooperation with upstream suppliers. We have found that there may be situations where the above-mentioned behaviors are violated to a certain extent, and we will take the same measures to deal with them.

## 七、关于行贿受贿及矿产原产地的欺诈性失实陈述

### **7. Bribery and Fraudulent Misrepresentation of Mineral Origin**

我们不会提出、承诺、进行或索要任何贿赂，并且抵制诱惑，不会为了掩盖或伪造矿产原产地，虚报矿产开采、贸易、处理、运输、出口等活动应向政府缴纳的税收、费用和特许开采费而行贿。

We will not offer, promise, give, or solicit bribes, nor will we engage in fraudulent misrepresentation of mineral origin, tax evasion, or illegal fee payments related to mining, trade, processing, transportation, or export.

## 八、关于洗钱及恐怖主义融资

### **8. Money Laundering and Terrorist Financing**

如果我们有理由认为，供应链中存在因开采、贸易、处理、运输、出口、在矿址入口、运输路线沿线、上游供应商矿产交易地等进行非法征税或勒索而得的矿产所引起或与之相关的洗钱风险或恐怖主义融资，我们将支持并采取措施，并按照规定及时向国务院公安部门、国家安全部门和反洗钱行政主管部门报告。

If we have reason to believe that there are money laundering risks or terrorist financing related to minerals obtained through illegal taxation or extortion in the supply chain, such as mining, trade, processing, transportation, export, at mining site entrances, along transportation routes, upstream supplier mineral trading locations, etc we will take measures and report to relevant authorities, including the Ministry of Public Security, State Security, and anti-money laundering regulators.

## 九、关于向政府支付的税收、费用及特许费

### **9. Taxes, Fees, and Royalties Paid to Governments**

我们将确保向政府支付所有与受冲突影响和高风险区域矿石开采、贸易、出口相关的合法税收、费用和特许费，并且承诺根据企业在供应链上所处位置依照《采掘行业透明度行动计划》（EITI）中的各项原则对此类支付进行披露。

We will ensure the payment of all legal taxes, fees, and royalties related to mining, trade, and export of minerals in conflict affected and high-risk areas to the government, and promise to disclose such payments in accordance with the principles of the Extractive Industry Transparency Action Plan (EITI) based on the company's position in the supply chain.

## 十、对行贿受贿及矿产原产地的欺诈性失实陈述、洗钱、恐怖主义融资及向政府支付的税收、费用、特许费的风险管理：

10、 Risk management for fraudulent misrepresentations, money laundering, terrorist financing, and taxes, fees, and royalties paid to the government regarding bribery, corruption, and mineral origin:

根据企业在供应链上所处的具体位置，我们承诺与供应商、中央或地方政府机关、国际组织、民间社会以及受影响的第三方酌情进行合作，本着在合理的时间跨度内采取显著措施防范或降低有负面影响的风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将暂时停止或中断与上游供应商的合作。

Based on the specific position of the enterprise in the supply chain, we promise to cooperate with suppliers, central or local government agencies, international organizations, civil society, and affected third parties as appropriate, with the aim of taking significant measures to prevent or reduce risks with negative impacts within a reasonable time frame, and improving or tracking performance. If the risk reduction measures do not work, we will temporarily suspend or interrupt our cooperation with upstream suppliers.

我公司认可的合格供应商提供的黄金产品必须符合 LBMA RGG 管理体系的各项要求，公司的相关对接单位须认真核实供应商信息，建立供应商信息管理档案，并不定期考察评估供应商风险。

The gold products provided by qualified suppliers recognized by our company must comply with the requirements of the LBMA RGG management system. The relevant liaison units of the company must carefully verify the supplier information, establish a supplier information management file, and periodically inspect and evaluate supplier risks.

## 十一、对环境和可持续性发展的风险管理

### 11. Environmental and Sustainability Risk Management

我公司认可的合格供应商需要满足当地环境和可持续发展的法律要求。若发现有违反环境和可持续性发展等要求的，可进行限期整改。若整改不到位的，则暂时停止或中断合作。

Our approved suppliers must comply with local environmental and sustainability laws. Violations will trigger corrective actions; failure to comply may result in suspension or termination of cooperation.

## 十二、ESG 因素考量

### 12. ESG Considerations

我们通过查询有关下列 ESG 因素的政策和实践，并使用精炼商工具包，解决开采金/再生金供应链中的 ESG 因素。ESG 考量因素基于风险厘定，以反映对手方的性质、规模和复杂性。

We address ESG factors in the mining/recycling gold supply chain by researching policies and practices related to the following ESG factors and using the Refiner Toolkit. ESG considerations are based on risk determination to reflect the nature, size,

and complexity of the counterparty.

1. 环境管理，包括：空气、水、土地污染和事件管理计划；水管理，特别是在缺水地区；未经授权从世界遗产地和保护区采购。

1. Environmental management, including air, water, land pollution, and incident management plans; Water management, especially in water scarce areas; Unauthorized procurement from World Heritage sites and protected areas.

2. 危险化学品（包括汞和氰化物）的储存、处理和处置注：LBMA 认识到汞主要用于手工和小规模开采（ASM）来源，因此并不禁止这类供应链。相反，LBMA 要求精炼商与这些手工供应链合作，帮助它们建立安全使用汞的流程，限制对环境、健康和安全的负面影响，并找到汞的替代解决方案。精炼商应与上游生产商合作，鼓励他们遵守国际氟化物管理守则。

2. Storage, handling, and disposal of hazardous chemicals (including mercury and cyanide) Note: LBMA recognizes that mercury is primarily used for manual and small-scale mining (ASM) sources, and therefore does not prohibit such supply chains. On the contrary, LBMA requires refiners to collaborate with these manual supply chains to help them establish safe processes for the use of mercury, limit negative impacts on the environment, health, and safety, and find alternative solutions for mercury. Refiners should collaborate with upstream producers and encourage them to comply with international fluoride management codes.

3. 劳工问题的管理，包括薪酬、工作时间、集体谈判、歧视、多样性、纠纷和工人权益保障。

3. Management of labor issues, including wages, working hours, collective bargaining, discrimination, diversity, disputes, and protection of workers' rights.

4. 社区参与和管理方案（土地征用和社区重新安置、文化遗产地和土著人民、关闭规划和保护弱势群体）。

4. Community participation and management programs (land acquisition and community resettlement, cultural heritage sites and indigenous peoples, closure planning, and protection of vulnerable groups).

十三、了解客户或对手方（KYC）

**13. Know Your Customer (KYC)**

每年度按照最新 KYC 调查表中的内容对供应链客户开展尽职调查，KYC 调查资料必须存档至少 5 年以上。作为我司的供应商需配合我公司进行供应链尽职调查，也鼓励供应商使用该工具包进行供应链尽职调查并可为此提供协助。

Annual KYC due diligence is conducted on supply chain clients, with records retained for at least five years. As a supplier of our company, they need to cooperate with our company in conducting supply chain due diligence. We also encourage suppliers to use this toolkit for supply chain due diligence and can provide assistance for this purpose.

#### 十四、员工培训

##### 14. Employee Training

每年为所有参与黄金供应链的员工制定持续的黄金供应链培训计划，每年开展 2 次培训。培训内容包括供应链政策、LBMA 负责任黄金指南、供应链反洗钱及反恐怖主义融资政策、KYC 调查表、供应链风险等内容。培训过程应记录培训内容，并对员工的出勤状况及其对供应链风险和尽职调查流程的认知进行适当监控。

Annual training (twice yearly) is provided to employees involved in the gold supply chain, covering policy, LBMA RGG, AML/CTF, KYC form and risk management. The training process should record the training content and appropriately monitor the attendance status of employees and their understanding of supply chain risks and due diligence processes.

#### 十五、申诉机制

##### 15. Grievance Mechanism

我公司的黄金供应链管理政策每年将公布于福建金玉德尚精炼科技有限公司官网，若您发现我公司在黄金供应链中的矿产开采、冶炼、运输、加工贸易、等存在上述情况，可通过以下方式联系我们，将您的意见和建议及时反馈给我们。我们将保护您的隐私，对举报人信息严格保密，杜绝任何行为的打击报复。  
邮箱：[shenji@decent9999.cn](mailto:shenji@decent9999.cn) / 电话：0086-591-62199999-9077

Our company's gold supply chain management policy will be published annually on the official website of Fujian Jinyudeshang Refinery Technology Co., Ltd. If you find that our company has the above-mentioned situations in mineral mining, smelting, transportation, processing trade, etc. in the gold supply chain, you can contact us in the following way and provide us with your opinions and suggestions in a timely manner. We will protect your privacy, strictly keep confidential the information of whistleblowers, and prevent any retaliation.

Email: [shenji@decent9999.cn](mailto:shenji@decent9999.cn) / Tel: 0086-591-62199999-9077

## 生效与发布

### Effective Date and Publication

本管理政策自发布之日实施，并传达给所有的黄金供应商，发布在公司的网站以便所有利益相关者进行查阅。官网链接：

[http://www.houdejin.com/content/details\\_5\\_332.html](http://www.houdejin.com/content/details_5_332.html)

This policy takes effect upon issuance, is communicated to all gold suppliers, and published on our website for stakeholder access.

Website link: [http://www.houdejin.com/content/details\\_5\\_332.html](http://www.houdejin.com/content/details_5_332.html)

福建金玉德尚精炼科技有限公司  
2025年2月28日

**Fujian Jinyudeshang Refinery Technology Co., Ltd.**

**February 28, 2025**