

金隆铜业有限公司

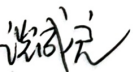
白银供应链尽职调查合规报告

(2024 年)

Jinlong Copper Co., Ltd.

Due Diligence Compliance Report on Silver Supply Chain

(2024)

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公司名称	金隆铜业有限公司
位置	安徽省铜陵市铜官区金山西路 1 号
年终报告	2024 年度白银供应链尽职调查合规报告
报告日期	2025 年 3 月
Company name	Jinlong Copper Co., Ltd.
Location	No.1 Jinshan West Road, Tongguan District, Tongling City, Anhui Province
Year end report	December 31, 2024
Report date	March, 2025

一、公司简介

金隆铜业有限公司（以下简称“公司”）是由铜陵有色金属集团股份有限公司、日本住友金属矿山株式会社和住友商事株式会社、平果铝业（中国铝业广西分公司）共同组建的中外合资企业，是中国有色金属行业以及安徽省最大的中外合资企业。经营范围：生产经营铜、金、银、稀有贵金属等产品及冶炼副产品。

I. Company Profile

Jinlong Copper Co., Ltd. (hereinafter referred to as "the company") is a sino-foreign joint venture co-founded by China's Tongling Nonferrous Metals Group Holding Co., Ltd., Japan's Sumitomo Metal Mining Co., Ltd., Japan's Sumitomo Corporation and China's Pingguo Aluminum Co. (Chinalco Guangxi Branch), which is the largest sino-foreign joint venture in China's non-ferrous metals industry and Anhui Province. Business scope: production and operation of copper, gold, silver, rare and precious metals and smelting by-products.

公司筹建于 1992 年，1993 年开工建设，1995 年被列为国家“八五”重点建设工程，1997 年 11 月 8 日建成投产，是我国第一座自行设计和施工的闪速炼铜工厂，原设计规模为年产阴极铜 10 万吨，硫酸 37.5 万吨，以及金、银等副产品。经过 15 万吨技改、21 万吨扩建改造和 35 万吨挖潜改造三次大的改造，目前已形成年产 45 万吨阴极铜、120 万吨硫酸、10 吨黄金、400 吨白银的生产能力。

Prepared in 1992 and commenced in 1993, it was listed as the key construction project of "the Eighth-five Year Plan" in 1995. It was put into operation on November 8, 1997 and is the first copper flash smelter designed and built independently in China. The design scale of initial stage was 100,000 ton cathode copper, 375,000 ton sulfuric acid and other byproducts including gold and silver etc. After 150,000 tpa technical transformation, 210,000 tpa expansion transformation and 350,000 tpa potential-tapping transformation, the annual production capacity of 450,000 tpa cathode copper, 1.2 million tpa sulfuric acid, 10 tpa gold and 400 tpa silver has taken shape.

主产品高纯阴极铜分别于 1998 年、2000 年在上海期货交易所、英国伦敦金属交易所注册成功。金锭于 2011 年在上海黄金交易所注册成功。银锭于 2012 年在上海期货交易所、2019 在伦敦金属交易所注册成功。公司取得 GB/T19001 质量管理体系、GB/T24001 环境管理体系、GB/T28001 职业健康安全管理体系认证，GB/T27025 检测和校准实验室通用能力认可，以及 AAAAAA 级标准化良好行为企业认证。

Its high-purity cathode copper, the main product, was successfully registered in Shanghai Futures Exchange and London Metal Exchange in 1998 and 2000 respectively. The gold bullion was successfully registered in Shanghai Gold Exchange in 2011. The silver bullion were successfully registered in Shanghai Futures Exchange in 2012 and London Metal Exchange in 2019. The company has obtained the certification of GB/T19001 quality management system, GB/T24001 environmental management system, GB/T28001 occupational health and safety management system, GB/T27025

accreditation for the competence of testing and calibration laboratories, and certification of AAAAA class good standardizing practice of enterprise.

根据 LBMA 发布的《LBMA 负责任白银指南》第二版的要求，公司应对供应商进行严格的尽职调查，以打击系统性或广泛性的侵犯人权行为，避免造成冲突，并遵守高标准的反洗钱和打击恐怖融资行为，避免不利 ESG 因素的管理风险。公司不断完善白银供应链尽职调查相关的管理政策，并对白银供应商进行了相应的尽职调查。本报告总结了截至 2024 年 12 月 31 日公司遵守《LBMA 负责任白银指南》的情况。

According to the requirements of the *LBMA Responsible Silver Guideline released by LBMA*, the company shall conduct strict due diligence on suppliers to combat systematic or widespread human rights violations, avoid conflicts, and comply with high standards of anti-money laundering and terrorist financing, while managing risks related to adverse ESG factors. The company has continuously improved the management policies related to due diligence of silver supply chain, and conducted corresponding due diligence on silver suppliers. This report summarizes the company's compliance with the LBMA responsible silver guidelines as of December 31, 2024.

二、合规性概述

公司对所有供应商进行供应链尽职调查，要求所有供应商提供的来源合法、合规。

II. Compliance Overview

The company conducts due diligence on the supply chain of all suppliers and requires all suppliers to provide legal and compliant sources.

第一步：建立强有力的公司管理体系

合规声明与要求：截至 2024 年 12 月 31 日止，公司已经部分遵守第 1 步的要求：建立强有力的公司管理体系，确保白银供应链尽职调查工作全面落地。

Step 1: Establish a Strong Company Management System

Compliance Statement and Requirements: As of December 31, 2024, the company has partially complied with the requirements of Step 1: establishing a robust corporate management system to ensure the full implementation of silver supply chain due diligence.

1.1 负责任的白银尽责管理政策

根据《LBMA 负责任白银指南》第二版和《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》第三版（以下简称“经合组织尽职调查指南”）附件II的要求，经公司矿产供应链合规管理委员会批准，公司于 2024 年对《金隆铜业有限公司矿产供应链合规管理政策》

<http://www.jinlongcopper.com/information/infoshow.aspx?cid=796&classid=467> 进行了修订（原《白银供应链尽责管理政策》），并在公司官网发布。

1. Responsible Silver Due Diligence Policy

According to the requirements of LBMA Responsible Silver Guideline issued by LBMA and OECD Due Diligence Guideline for Responsible Supply Chain of Ores from Conflict-affected and High-risk Areas (hereinafter referred to as the OECD Due Diligence Guideline) attached in Annex II, Approved by the company's Mineral Supply Chain Compliance Management Committee, Jinlong Copper Co., Ltd. revised the *Jinlong Copper Co., Ltd. Mineral Supply Chain Compliance Management Policy* (<http://www.jinlongcopper.com/information/infoshow.aspx?cid=796&classid=467>) in 2024 (formerly the "*Silver Supply Chain Due Diligence Policy*"), and published them on the company's official website.

2024 年公司为了更全面地契合新版指南的相关政策要求，明确尽职调查流程和调查范围，监督预防和减轻冲突矿产及不利的环境、社会 and 治理 ESG 因素

在公司供应链中的风险。公司及时对《白银供应链尽职调查政策》进行了更新修订，公司承诺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，积极参与白银供应链尽职调查工作；在白银生产、贸易过程中出现“大规模滥用人权”、“非政府武装团体直接或间接支持的行为”、“对个人（包括政府官员、客户、和供应商或任何其他组织）要求贿赂或者回扣”等行为采取零容忍态度；在企业生产运营过程中，公司完全遵守并倡导 ESG 中对环境管理、危化品（包括汞和氰化物）管理、劳工问题管理、引导社区参与管理以及商业诚信和道德管理等。

In 2024, to more comprehensively align with the policy requirements of the new edition of the Guidance and to clarify the due diligence processes and scope of investigation, the company aims to monitor and mitigate the risks of conflict minerals and adverse environmental, social, and governance (ESG) factors within its supply chain. The company promptly updated and revised the "Silver Supply Chain Due Diligence Policy". The company commits to strictly comply with national laws and regulations regarding workers' rights, environmental protection, fair trade, and other relevant areas, and actively participates in silver supply chain due diligence efforts. The company adopts a zero-tolerance stance towards behaviors such as "gross human rights abuses," "direct or indirect support to non-state armed groups," and "demands for bribes or kickbacks from individuals (including government officials, customers, suppliers, or any other organizations)" during silver production and trade. In its production and operations, the company fully adheres to and advocates for ESG principles, including environmental management, management of hazardous chemicals (such as mercury and cyanide), labor issue management, community engagement management, and business integrity and ethical conduct management.

尽职调查管理办法包括适用范围、组织架构和责任、供应商及客户信息的收集、供应链风险识别和评估、供应链交易监控、记录档案的管理、培训和沟通等内容，该政策规定我们有责任开展基于风险的尽职调查、筛选和监控交易以及现

行治理结构。

The Due Diligence Management Measures include the scope of application, organizational structure and responsibilities, collection of supplier and customer information, supply chain risk identification and assessment, supply chain transaction monitoring, management of records and archives, training, and communication, among other contents. This policy stipulates that we are responsible for conducting risk-based due diligence, screening and monitoring transactions, as well as maintaining the current governance structure.

合规管理委员会每年审查一次公司的《矿产供应链合规管理政策》、《白银供应链尽职调查管理办法》和《白银供应链尽职调查风险缓解策略》，在情况需要时进行更新，并通过公告与 OA 邮件形式将其传达给所有相关员工。

The Compliance Management Committee reviews the company's "*Mineral Supply Chain Compliance Management Policy*," "*Silver Supply Chain Due Diligence Management Measures*," and "*Silver Supply Chain Due Diligence Risk Mitigation Strategy*" annually, updating them as necessary, and communicated to all relevant employees through announcements and OA emails.

1.2 尽职调查的内部管理组织机构

经公司董事会批准授权，成立了以总经理高大银为主任，包括计财部、商务部、安全环境基础部等各部门部门长为委员的合规管理委员会。委员会主要负责监督公司尽职调查体系的正常运行，每年评估供应链调查政策和流程的有效性并推动持续改进，确保公司政策在内的关键信息沟通程序的有效传达，评估合规管理办公室供应链尽职调查体系运行的资源支持是否足够，以及签署审批涉及供应链尽职调查的相关决策。

1.2 Internal Management Organization for Due Diligence

Approved and authorized by the company's Board of Directors, a Compliance

Management Committee has been established, with Gao Dayin, the General Manager, serving as the Chairperson, and department heads from the Finance Department, Business Department, Safety and Environmental Infrastructure Department, and other relevant departments serving as committee members. The committee is primarily responsible for overseeing the proper functioning of the company's due diligence system, annually evaluating the effectiveness of supply chain investigation policies and processes and driving continuous improvement, ensuring the effective communication of key information including company policies, assessing whether the resources supporting the operation of the supply chain due diligence system by the Compliance Management Office are sufficient, and approving decisions related to supply chain due diligence.

1.2.1 合规官

委员会下设合规管理办公室，具体负责审查供应链尽职调查程序，以确保满足 LBMA 的合规要求；确保公司政策在内的关键信息沟通程序的有效传达；保证足够的资源支持尽职调查体系的运行和监控；周期对关键员工就供应链风险管理进行培训，制定、更新政策和程序文件；审阅供应商签署的 KYC 文件和风险分类，必要时提供额外信息或文件；确保针对高风险供应链或交易所执行的适当措施；为合规管理委员会履职提供必要的文件或材料。

其中安全环境基础部部长钱建成担任合规管理办公室主任（合规官），并且在各部门和课室配置了业务相关的合规联络员，从事各课室尽职调查管理相关业务日常工作。

1.2.1 Compliance Officer

Under the committee, a Compliance Management Office has been established, specifically responsible for reviewing supply chain due diligence procedures to ensure compliance with LBMA requirements; ensuring the effective communication of key information, including company policies; guaranteeing sufficient resources to support the operation and monitoring of the due diligence system; periodically training key

employees on supply chain risk management; developing and updating policy and procedural documents; reviewing KYC files and risk classifications signed by suppliers, and providing additional information or documentation as necessary; ensuring appropriate measures are implemented for high-risk supply chains or transactions; and providing the necessary documents or materials for the Compliance Management Committee to perform its duties.

Qian Jiancheng, the head of the Safety and Environmental Infrastructure Department, serves as the Director of the Compliance Management Office (Compliance Officer). Additionally, compliance liaisons have been assigned to various departments and sections to manage due diligence-related tasks in their respective areas on a daily basis.

公司明确了合规管理委员会、合规管理办公室，合规办公室主任和合规联络员的职责。其中，委员会主任具有丰富的生产经营管理经验及风险防范意识，对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，完全有能力履行好白银供应链尽职调查的所有事项。合规管理办公室主任熟知负责任供应链政策，对于供应链合规管理工作有着丰富的经验，完全有能力负责供应链合规的日常管理工作以及定期对尽职调查管理流程有效性的评审。

The company has clearly defined the responsibilities of the Compliance Management Committee, the Compliance Management Office, the Director of the Compliance Management Office, and the compliance liaisons. The Chairperson of the committee possesses extensive experience in production and operations management as well as risk prevention awareness. They provide sufficient human and financial resources for the establishment of a responsible sourcing management system for the silver supply chain and are fully capable of overseeing all aspects of silver supply chain due diligence. The Director of the Compliance Management Office is well-versed in responsible supply chain policies and has extensive experience in supply chain compliance management. They are fully capable of handling the daily

management of supply chain compliance and conducting regular reviews of the effectiveness of the due diligence management processes.

1.2.2 培训

公司每年将 LBMA 负责的白银指南、供应链尽职调查管理流程培训纳入公司年度培训计划当中，通过公司网站、手机微信群、交流以及会议等方式，必要时外聘老师进行授课，组织公司供应链合规委员会、合规办公室成员以及供应商进行培训，培训内容包括《LBMA 负责的白银指南》《经合组织尽职调查指南》，以及对供应链风险评估工具：如相关制裁名单、欧盟 CAHRA 名单、海德堡晴雨表、脆弱国家指数或类似的指数、金融行动特别工作组（FATF）的报告，确保公司各课室相关业务人员以及合规委员会、办公室成员熟悉《管理办法》和《LBMA 负责任白银指南》对尽职调查程序的工作要求，且为了强化培训效果，我们在培训总结期间设置问答环节，对培训人员进行随机提问。2024 年公司对各课室合规业务关键人员包括工艺稀贵课 2 名、安基部质计课 2 名、商务部原料课 5 名、计财部财务课 2 名共 11 人进行了员工培训。

1.2.2 Training

The company annually incorporates training on the LBMA Responsible Silver Guidance and supply chain due diligence management processes into its annual training plan. Training is conducted through the company website, mobile WeChat groups, exchanges, meetings, and, when necessary, by hiring external instructors. The training is organized for members of the company's Supply Chain Compliance Committee, the Compliance Office, and suppliers. The training content includes the *LBMA Responsible Silver Guidance*, the *OECD Due Diligence Guidance*, and supply chain risk assessment tools such as relevant sanctions lists, the EU CAHRA list, the Heidelberg Barometer, the Fragile States Index or similar indices, and reports from the Financial Action Task Force (FATF). This ensures that relevant personnel from various departments, as well as members of the Compliance Committee and Office, are familiar with the *Management Measures* and the *LBMA Responsible Silver*

Guidance, and understand the work requirements for due diligence procedures. To enhance the effectiveness of the training, a Q&A session is included at the end of the training, where participants are randomly questioned. In 2024, the company conducted employee training for 11 key compliance personnel across various departments, including: 2 personnel from the Precious Metals Process Section of the Technology Department, 2 personnel from the Quality and Measurement Section of the Safety and Environmental Infrastructure Department, 5 personnel from the Raw Materials Section of the Business Department, 2 personnel from the Finance Section of the Finance Department.

公司通过会议、面谈等方式对逐步升级的严重违反内部尽职调查流程行为的相关人员实施内部考核机制，根据导致事态的严重程度采取警告或处罚等方式。2024 年度，未发现员工因供应链调查工作懈怠或谎报相关数据信息导致的考核处罚行为。

The company implements an internal assessment mechanism for personnel involved in progressively severe violations of internal due diligence procedures through meetings, face-to-face discussions, and other methods. Depending on the severity of the situation, warnings or penalties are imposed. In 2024, no employees were found to have been penalized due to negligence in supply chain investigation work or falsification of related data and information.

1.2.3 支付政策和记录保存

公司在支付货款时，由业务部门发起资金事项联签程序，经过审批通过后，通过公司银行账户进行网上付款，国内通过银行付款，国外通过信用证付款，并打印银行回单作为凭证附件保留。此外，公司保存供应商营业执照等资质验证资料复印件，保存供应商尽职调查表、每一批次过磅单、水分测定原始记录、检测原始记录、检测报告、结算单、付款凭据等相关记录资料，并且保存 5 年以上。

1.2.3 Payment Policies and Record Retention

When making payments, the company initiates a joint signing procedure for

fund-related matters through the business department. After approval, payments are made via the company's bank account, with domestic payments processed through bank transfers and international payments through letters of credit. Bank receipts are printed and retained as supporting documents. Additionally, the company keeps copies of supplier business licenses and other qualification verification documents, as well as records such as supplier due diligence forms, weight slips for each batch, original moisture measurement records, original testing records, test reports, settlement documents, payment vouchers, and other related records, which are retained for more than five years.

1.3 建立内部供应链追溯体系

公司白银供应链的所有原料均为来自大中型矿山的开采银，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，供应商行为守则，承诺原料来源合法合规，符合 LBMA 尽职调查政策。

1.3 Establishment of an Internal Supply Chain Traceability System

All raw materials in the company's silver supply chain are sourced from large and medium-sized mines as mined silver. All suppliers undergo credit investigations, and upon approval, contracts are signed along with the Supplier Social Commitment Letter and the Supplier Code of Conduct. These documents ensure that the suppliers commit to the legality and compliance of the raw material sources, in accordance with the LBMA due diligence policy.

公司建立了一套可追溯系统，商务采购部门会向供应商收集原料的原产地、材料类型、到达日期和最终确定日期相关信息以及合同、提单、海关单等有关文件；质检部门对供应商供应的每一批原料都进行验收，验收项目包括重量、水分、品位等，重量验收有过磅单，水分验收有水分测定原始记录，品位验收有检测报告，过磅单、水分测定原始记录由验收人员和供应商（必要时）签字确认，最终

以质检报告形式发给供应商；生产过程取样化验，最后形成白银产品，打印唯一编号，通过上海黄金交易所或白银客户进行交易。我们在日常工作中对每一笔原料交易的原料类型、重量、品位，运输路线，装船批次与采购订单、发票等相关信息的一致性进行核对审查，确保每一笔交易的风险状况都在可控的监控范围内。2024 年所有采购的原料交易数据均正常无疑。

The company has established a traceability system. The business procurement department collects information from suppliers regarding the origin of raw materials, material types, arrival dates, finalization dates, as well as relevant documents such as contracts, bills of lading, and customs declarations. The quality inspection department inspects each batch of raw materials supplied by the vendors. Inspection items include weight, moisture content, grade, etc. Weight inspection is documented with weighbridge slips, moisture content inspection with original moisture measurement records, and grade inspection with test reports. The weighbridge slips and original moisture measurement records are signed and confirmed by the inspection personnel and the supplier (when necessary), and the final quality inspection report is issued to the supplier. During the production process, samples are taken and tested, ultimately forming silver products with unique serial numbers, which are traded through the Shanghai Gold Exchange or silver customers. In daily operations, we verify and review the consistency of information such as raw material type, weight, grade, transportation routes, shipment batches, purchase orders, and invoices for each raw material transaction. This ensures that the risk status of each transaction is within a controllable monitoring range. In 2024, all purchased raw material transaction data were normal and without any issues.

1.4 加强与白银交易对手方的联系加强

公司商务部原料课负责按照《白银供应链尽职调查管理办法》与原料供应商进行沟通。通过邮件、微信、电话等方式沟通，使其及时了解 LBMA 负责的

白银供应政策，以及公司白银供应链尽职调查的政策，并告诫供应商需遵循相关政策及程序。通过充分沟通对供应商进行风险评估，避免与高风险供应商进行合作。

1.4 Strengthening Engagement with Silver Counterparties

The Raw Materials Section of the company's Business Department is responsible for communicating with raw material suppliers in accordance with the *Silver Supply Chain Due Diligence Management Measures*. Communication is conducted through emails, WeChat, phone calls, and other means to ensure that suppliers are promptly informed about the LBMA Responsible Silver Supply Policy and the company's silver supply chain due diligence policies. Suppliers are also reminded to adhere to these policies and procedures. Through thorough communication, risk assessments are conducted on suppliers to avoid cooperation with high-risk suppliers.

此外，我们积极倡导供应商广泛参与供应链合规管理工作，以提升整体管理水平。因此，为了增强供应链合规管理的实效性，2024 年 8 月，我们委托了一家具备专业资质的第三方机构，邀请了供应链合规管理领域的专家，并召集了供应链中各相关供应商的合规负责人，在线上开展了供应链合规管理的专题培训。此举旨在向各供应商明确传达我们推进供应链合规管理工作的决心，同时也展现了我们努力提升供应链各环节合规管理水平的实际行动。

In addition, we actively encourage suppliers to widely participate in supply chain compliance management to enhance overall management standards. Therefore, to strengthen the effectiveness of supply chain compliance management, in August 2024, we engaged a professionally qualified third-party organization, invited experts in the field of supply chain compliance management, and convened compliance officers from relevant suppliers across the supply chain to conduct a specialized online training session on supply chain compliance management. This initiative aims to clearly communicate our determination to advance supply chain compliance management to all suppliers, while also demonstrating our practical efforts to improve

compliance management standards at every stage of the supply chain.

在与供应商合作之前，原料课会要求所有白银原料供应商签订一份合规声明或在合同条款中明确合规条款，确保供应商了解并遵守《LBMA 负责任白银指南》，以及公司白银供应链政策及要求，降低合作风险。2024 年度，公司所有原料供应商共 42 家均签署了承诺书，保证遵守遵守《LBMA 负责任白银指南》，以及我司白银供应链尽职调查政策及要求。

Before collaborating with suppliers, the Raw Materials Section requires all silver raw material suppliers to sign a compliance declaration or include explicit compliance clauses in the contract terms. This ensures that suppliers understand and adhere to the *LBMA Responsible Silver Guidance*, as well as the company's silver supply chain policies and requirements, thereby reducing cooperation risks. In 2024, all 42 raw material suppliers signed the commitment letter, pledging to comply with the *LBMA Responsible Silver Guidance* and the company's silver supply chain due diligence policies and requirements.

公司支持实施采掘业透明度行动计划的倡议,2024 年度期间暂无从支持 EITI 国家运营的国有企业处购买开采的银。

The company supports the implementation of the Extractive Industries Transparency Initiative (EITI). During 2024, the company did not purchase any mined silver from state-owned enterprises (SOEs) operating in EITI-implementing countries.

1.5 建立保密申诉机制

在公司尽职调查管理中，提供了白银供应链管理报告机制及渠道，包括但不限于供应链政策、公司 ESG 管理、公司运营、治理等方面有疑问或者发现违规行为的可通过电话+86-562-3868888、电子邮箱 jcc@jinlongcopper.com 等方式进行反馈。公司供应链合规政策、电话、电子邮箱均在公司外网发布，公司员工

及供应商均可以通过网络了解这些信息，并根据自身意愿实名或匿名对相关问题按申诉机制流程提出申诉

<http://www.jinlongcopper.com/information/infoshow.aspx?cid=795&classid=467>，公司保证对申诉方的信息保密，杜绝任何行为的打击报复。

1.5 Establishment of a Confidential Grievance Mechanism

In the company's due diligence management, a reporting mechanism and channels for silver supply chain management are provided. Any questions or identified violations related to supply chain policies, corporate ESG management, company operations, or governance can be reported via phone at +86-0562-3868888 or email at jcc@jinlongcopper.com. The company's supply chain compliance policy, phone number, and email address are published on the company's external website. Both employees and suppliers can access this information online and submit grievances, either anonymously or using their real names, in accordance with the grievance mechanism procedures

(<http://www.jinlongcopper.com/information/infoshow.aspx?cid=795&classid=467>).

The company guarantees the confidentiality of the complainant's information and prohibits any form of retaliation.

我们接收到申诉时将根据申诉管理办法流程并及时反馈合规管理办公室，在 7 个工作日内反馈申诉者受理与否的意见以及确定受理申诉后初步要采取的措施。在确定受理后将启动调查程序，通过外部调查、评估、供应商询问、内部程序检查等方式落实问题症结，经合规管理办公室开会讨论向委员会汇报并批准后，在受理申诉的 60 个工作日内通过原渠道反馈申诉者解决方案，促成书面共识的达成，并执行解决方案相关措施；若双方的沟通未能达成令人满意的结果，将向第三方如行业协会、领域专家、咨询机构等寻求解决途径。公司将截止 2024 年 12 月 31 日，公司并未收到员工及相关供应商的任何申诉。

Upon receiving a grievance, the company will follow the Grievance Management Procedures and promptly notify the Compliance Management Office. Within 7 business days, the complainant will be informed whether the grievance is accepted and the preliminary measures to be taken if accepted. If the grievance is accepted, an investigation process will be initiated to identify the root cause through external investigations, assessments, supplier inquiries, and internal procedure reviews. After discussion by the Compliance Management Office and approval by the committee, a resolution will be communicated to the complainant through the original channel within 60 business days of acceptance, aiming to reach a written agreement and implement the resolution measures. If communication fails to yield a satisfactory outcome, the company will seek resolution through third parties such as industry associations, domain experts, or consulting agencies. As of December 31, 2024, the company has not received any grievances from employees or related suppliers.

第二步：识别并评估供应链中的风险

第 2 步合规概述：截至 2024 年 12 月 31 日，公司部分遵守第 2 步：识别并评估供应链中的风险。

公司严格遵守 LBMA 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。

Step 2: Identify and Assess Risks in the Supply Chain

Compliance Overview for Step 2: As of December 31, 2024, the company has partially complied with Step 2: Identify and Assess Risks in the Supply Chain.

The company strictly adheres to the requirements of Step 2: Identification and Assessment of Supply Chain Risks in the LBMA Responsible Silver Guidance. We have established criteria for identifying high-risk supply chains and defined procedures for addressing identified risks, ensuring thorough identification and assessment of risks within the supply chain.

2.1 识别白银供应链内的风险

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 ESG 因素，精炼厂识别相关风险，密切关注来自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、源于世界遗产遗址等地区的白银，以及用于贿赂、洗钱、恐怖主义融资等行为的白银。公司为每个供应商建立供应商档案，填写 KYC 问卷，承诺书，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。

2.1 Identifying Risks in the Silver Supply Chain

In accordance with Annex II of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, and extending to adverse ESG factors in the supply chain, the refinery identifies relevant risks. We closely monitor gold and silver sourced from regions that fail to comply with environmental and sustainable development legal requirements, violate human rights, are involved in armed conflicts, engage in illegal mining, or originate from World Heritage Sites. Additionally, we scrutinize gold and silver used for bribery, money laundering, and terrorism financing. The company establishes a supplier profile for each supplier, completes a KYC questionnaire, and obtains a commitment letter. The supplier profile is finalized before signing a contract, and a risk rating is assigned to each supplier.

在进行合作之前，商务部需要对供应商进行风险评估，公司白银供应链风险评估依据包括三个方面：位置风险、供应商风险、材料类型风险。

Before initiating cooperation, the Business Department is required to conduct a risk assessment on suppliers. The company's silver supply chain risk assessment is based on three aspects: location risk, supplier risk, and material type risk.

位置风险参考查阅制裁名单（美国、英国、欧盟、联合国及相关制裁）、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、金融特别行动工作组（FATF）的报告（包括相关国家/地区报告）、关于高风险白银中心/转运中心和高洗钱风险国家/地区的可靠市场情报、世界遗产地列表等资料。

Location risk is assessed by referencing sanctions lists (including those from the United States, the United Kingdom, the European Union, the United Nations, and related sanctions), the EU CAHRA list, the Heidelberg Barometer, the Fragile States Index or similar indices, reports from the United Nations Office of the High Commissioner for Human Rights or equivalent bodies, reports from the Financial Action Task Force (FATF) (including relevant country/region reports), and reliable market intelligence on high-risk silver hubs/transit hubs and countries/regions with high money laundering risks, the World Heritage Site list, and other relevant data.

为了评估来自供应商的风险，我们根据所提供的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、许可证信息；识别验证最终实益拥有人和白银供应对手方的获授权签署人；确认白银交易对手方及其最终实益拥有人不属于任何涉及洗钱、诈骗、恐怖分子的政府通缉；获取白银交易对手方的业务和财务情况，以及有业务关系的目的和预期性质的信息；且尽可能地将供应链调查向供应商的上游延伸，通过询问利益相关方了解其商业活动的风险，对于涉及零容忍供应链的供应商拒绝合作。

To assess risks originating from suppliers, we investigate the basic information of suppliers, shareholder details, and license information based on the qualification documents provided that meet the requirements of the supply chain due diligence management system. We identify and verify Ultimate Beneficial Owners (UBOs) and authorized signatories of silver-supplying counterparties, confirm that silver counterparties and their UBOs are not on any government watchlists for money laundering, fraud, or terrorism, and obtain the business and financial profiles of silver counterparties, along with information on the purpose and intended nature of the business relationship. Additionally, we strive to extend the supply chain investigation

upstream to the suppliers' sources by engaging stakeholders to understand the risks associated with their commercial activities. Suppliers linked to zero-tolerance supply chains are refused cooperation.

关于材料类型，我们基于《LBMA 负责任白银指南》中对含银材料的定义，确定我们 2024 全年采购的所有含银原料均为来自开采银的 LSM，故我们使用关于开采材料的 KYC，获取矿源地供应商如进出口许可证；采矿加工、运输方法；生产数据、加工能力；来自第三方库存及管理该库存的措施；识别供应商来自洗钱、恐怖主义融资、贿赂、腐败、ESG 管理等风险。

Regarding material types, based on the definition of silver-bearing materials in the *LBMA Responsible Silver Guidance*, we confirm that all silver-bearing raw materials procured throughout 2024 are sourced from Large-Scale Mining (LSM) of mined silver. Therefore, we use the KYC for Mined Materials to obtain information from mining source suppliers, such as import/export licenses; mining practices, including processing and transportation methods; production data and processing capacity; third-party stock sources and measures to manage such stock; and identification of risks related to money laundering, terrorist financing, bribery, corruption, and ESG management.

若供应商没有触发上述类型的警示信号，则判定其为低风险供应商；如果存在上述任一风险事件，公司会把该供应商定义为高风险供应商，针对高风险供应商公司尽职调查小组会对该供应商进行复审，复审的程序包括实地考察、对尽职调查结果进一步核实等，在高风险事件没有解除之前，公司不会与其建立任何合作关系，在经确认不存在此类高风险事件后，公司才会与之开展正常的合作。此外公司尽职调查小组会确保每年对已合作的供应商的 KYC、尽职调查文件、风险评估等相关工作和信息的更新，积极与供应商保持最有效地沟通，以保证公司的矿产供应链的合规状况的时效性。

If a supplier does not trigger any of the aforementioned warning signals, they are

classified as a low-risk supplier. If any of the above risk events are identified, the company designates the supplier as a high-risk supplier. The company's due diligence team will then conduct a re-evaluation of the high-risk supplier, including procedures such as on-site visits and further verification of due diligence results. Until the high-risk issues are resolved, the company will not establish any cooperative relationship with the supplier. Normal cooperation will only commence after confirming the absence of such high-risk issues. Additionally, the company's due diligence team ensures annual updates to the KYC, due diligence documents, and risk assessments of existing suppliers. We maintain effective communication with suppliers to ensure the timeliness and compliance of the company's mineral supply chain.

以上调查和评估工作均由合规办公室成员课室及所属合规联络员参与，从各自所属业务负责的领域对于供应商进行评估，报合规办公室主任进行综合评审，评审结果由合规办公室主任上报合规委员会。

The above investigations and assessments are conducted with the participation of the Compliance Office members, relevant departments, and their designated compliance liaisons. Each department evaluates suppliers based on their respective areas of responsibility, and the results are submitted to the Director of the Compliance Office for comprehensive review. The review results are then reported by the Director of the Compliance Office to the Compliance Committee.

2024 年底，由合规办公室总结 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，由合规办公室主任审核后，报合规委员会进行审批。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，对供应商的调查和评估结果均为低风险。

At the end of 2024, the Compliance Office summarized the supply chain due diligence work for the year and developed a plan for the following year, compiling a compliance report. After review by the Director of the Compliance Office, the report

was submitted to the Compliance Committee for approval. Once approved, the report was published on the company's public website. During 2024, the company completed due diligence on all suppliers and identified no zero-tolerance or high-risk supply chains. The results of the supplier investigations and assessments for 2024 were all classified as low-risk.

2.2 风险识别类型分类

根据 LBMA 和 OECD 相关规定，供应链尽职调查过程中出现的零容忍风险以及高风险情况，需满足以下最低标准：

2.2 Classification of Risk Identification Types

In accordance with the regulations of the LBMA and the OECD, the following minimum standards must be met for zero-tolerance risks and high-risk situations identified during the supply chain due diligence process:

2.2.1 零容忍供应链风险评判标准

- 开采银来自被指定为世界遗产地的地区并且未被提供明确授权
- 以违反国际制裁（包括但不限于联合国、欧盟、英国和美国制裁）的方式采购开采银或再生银
- 开采银或再生银的供应对手方、其他已知的上游公司或其 UBO 是已知的洗钱者、欺诈者或恐怖分子，或曾严重侵犯人权，或直接或间接支持非法非国家武装组织

2.2.1 Zero-Tolerance Supply Chain Risk Criteria

- Mined silver originates from areas designated as World Heritage Sites without explicit authorization.

- Mined or recycled silver is sourced in violation of international sanctions (including but not limited to sanctions by the United Nations, the European Union, the United Kingdom, and the United States).

- The supplier of mined or recycled silver, other known upstream companies, or their Ultimate Beneficial Owners (UBOs) are known money launderers, fraudsters, or terrorists, or have been involved in gross human rights abuses, or directly or indirectly support illegitimate non-state armed groups.

2.2.2 高风险供应链风险评判标准

结合公司实际情况，特规定开采银或作为采矿副产品的白银、回收银参照如下高风险白银供应链评判标准：

1) 对于基于位置的高风险， 开采银或作为采矿副产品的白银：

- 来自受冲突影响和高风险地区(CAHRA)或曾在该等地区过境或通过该等地区运输

- 据称来自已知或合理怀疑来自(CAHRA) 的白银过境的地区/国家

- 据称来自已知储量、可能资源或预期产量有限的国家/地区

2) 对于基于供应商的高风险， 白银供应对手方或其他已知的上游公司：

- 具有符合基于位置高风险标准的股东或 UBO （最终实益拥有人）或其他白银供应权益

- 具有身为政治人物 PEP（政治人物）的 UBO

- 从事高风险商业活动（如军火、赌博和娱乐业、古董和艺术、教派及其领袖）

- 已知在过去 12 个月曾从高风险国家/地区采购白银

- 提供的文件有重大差异/不一致，或拒绝提供所要求的文件。

3) 对于基于材料类型的高风险，开采银或作为采矿副产品的白银：

- 采购自 **ASM**（手工和小规模采矿）

- 使用汞生产

- 造成灾难性伤害或高度不利的 **ESG** 因素（在精炼商能够识别的范围内）

（例如，通过公共领域的记录或精炼商的尽职调查文件）

4) 对于基于材料类型的高风险，回收银：

- 来自具有高风险供应链的中间精炼厂或交易商（根据经合组织尽职调查指南）或来自具有高风险供应链的中间精炼厂采购的交易对手方（根据经合组织尽职调查指南）

2.2.2 High-Risk Supply Chain Risk Criteria

Based on the company's actual circumstances, the following high-risk silver supply chain criteria are established for mined silver, silver as a mining by-product, and recycled silver:

1) Location-Based High Risks for Mined Silver or Silver as a Mining By-Product:

- Originates from, transits through, or is transported via Conflict-Affected and High-Risk Areas (CAHRAs).

- Is claimed to originate from a country/region through which silver from CAHRAs is known or reasonably suspected to transit.

- Is claimed to originate from a country/region with limited known reserves, likely resources, or expected production levels.

2) Supplier-Based High Risks for Silver-Supplying Counterparties or Other Known Upstream Companies:

- Has shareholders or Ultimate Beneficial Owners (UBOs) or other silver supply interests that meet location-based high-risk criteria.

- Has UBOs who are Politically Exposed Persons (PEPs).

- Engages in higher-risk business activities (e.g., arms, gaming and entertainment, antiques and art, sects and their leaders).

- Is known to have sourced silver from high-risk countries/regions in the past 12 months.

- Has material discrepancies/inconsistencies in the documentation provided or refuses to provide requested documentation.

3) Material Type-Based High Risks for Mined Silver or Silver as a Mining By-Product:

- Sourced from Artisanal and Small-Scale Mining (ASM).

- Produced using mercury.

- Contributes to catastrophic harm or highly adverse ESG factors (to the extent identifiable by the refiner, e.g., through public records or the refiner's due diligence files).

4) Material Type-Based High Risks for Recycled Silver:

- Sourced from an intermediate refiner or trader with a high-risk supply chain (as per the OECD Due Diligence Guidance) or from a trading counterparty sourcing from an intermediate refiner with a high-risk supply chain (as per the OECD Due Diligence Guidance).

根据上述零容忍供应链标准判定。审查了 2024 年全年供应链风险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，也不存在供应向对方、其他已知的上游公司或它们的最终受益者是已知的洗钱者、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。故 2024 年公司供应链并无涉及零容忍风险。

Based on the aforementioned zero-tolerance supply chain criteria, a review of the supply chain risks throughout 2024 confirmed that: No materials originated from areas designated as World Heritage Sites or protected areas. No materials were sourced from countries in violation of international sanctions. No suppliers, other known upstream companies, or their Ultimate Beneficial Owners (UBOs) were identified as known money launderers, fraudsters, or terrorists. No instances of gross human rights abuses or direct or indirect support to illegitimate non-state armed groups were found. No fraudulent misrepresentation of mineral origins was detected. Therefore, in 2024, the company's supply chain did not involve any zero-tolerance risks.

2024 年度期间我公司采购的原料供应商共计 42 家，其中进口供应商 22 家，国内供应商 20 家。国外主要来源地为：秘鲁、智利、墨西哥、巴西、西班牙，国内主要来源地为安徽、江西。根据 2024 年度对进口供应商进行识别风险，关于位置风险查询无中国、美国、英国、欧盟、联合国制裁，不在金融行动特别工

作组（FATF）名单，并结合脆弱国家指数、联合国人权事务高级专员办事处或同等机构、关于高风险黄金和白银中心/转运中心和高洗钱风险国家/地区的可靠市场情报等资料，对疑似高风险供应链排除如下：

In 2024, the company procured raw materials from a total of 42 suppliers, including 22 international suppliers and 20 domestic suppliers. The primary international sources were: Peru, Chile, Mexico, Brazil, and Spain, while the main domestic sources were Anhui and Jiangxi. Based on the risk identification for international suppliers in 2024, the following assessments were made regarding location risks: No sanctions from China, the United States, the United Kingdom, the European Union, or the United Nations were identified. None of the suppliers were listed on the Financial Action Task Force (FATF) list. By referencing the Fragile States Index, reports from the United Nations Office of the High Commissioner for Human Rights or equivalent bodies, and reliable market intelligence on high-risk gold and silver hubs/transit hubs and countries/regions with high money laundering risks, the World Heritage Site list, and other relevant data. The following suspected high-risk regions were excluded:

1. 关于来自刚果金的原料，我们于 2024 年 6 月参与行业联合实地评估，委托第三方资质机构赴现场进行了实地调查，并出具了调查报告。关于武装冲突风险，刚果（金）的非国家武装团体集中在基伍、卡塞和伊图里三个地区，在公司所处的卢阿拉巴省未识别到广泛的非政府武装冲突；关于人权，公司均制定了相应的人力资源管理制度，明确了遵守法定工时，禁止童工，涉及暴力、性骚扰等规定，以及相关的处罚措施等方面的内容；关于洗钱、腐败风险，公司制定了一

系列管理标准，宣誓了公司的反贿赂、反贪污、反洗钱政策，遵从国际相关标准；并有风险防范措施计划以及跟踪监督机制。

综上判定来自刚果金的原料供应链为低风险。

1. Regarding raw materials from the Democratic Republic of Congo (DRC), in June 2024, we participated in an industry joint on-site assessment and commissioned a qualified third-party organization to conduct onsite investigation, which resulted in an investigation report.

Armed Conflict Risk: Non-state armed groups in the DRC are concentrated in the Kivu, Kasai, and Ituri regions. No widespread non-state armed conflicts were identified in Lualaba Province, where the company operates. Human Rights: The company has established corresponding human resource management systems, clearly defining compliance with statutory working hours, prohibition of child labor, regulations on violence and sexual harassment, and related disciplinary measures. Money Laundering and Corruption Risks: The company has developed a series of management standards, declaring its anti-bribery, anti-corruption, and anti-money laundering policies in compliance with international standards. Additionally, there are risk prevention measures and monitoring mechanisms in place.

In summary, the supply chain for raw materials from the DRC is classified as low-risk..

2. 关于来自赞比亚的原料，联合国人权事务高级专员办事处指出赞比亚铜带省涉及使用童工的人权侵犯风险，我们进行了以下三方面调查： a、我们检索了公开信息发现，kansanshi 矿业公司、CCS 冶炼厂并无涉及关于人权侵犯的任

何第三方指控；b、我们查询了公司官网的公开信息，公司均制定了相应的管理制度，明确指出遵循《联合国工商企业与人权指导原则》（UNGPs），禁止强迫劳动与童工，并要求供应商填写《行为准则》；c、我们查阅了公司官网，发现 kansanshi 参与并通过了 IRMA 审计，CCS 也每年发布可持续发展报告，并公开披露报告内容。因此判定其涉及人权侵犯风险为低风险。

综上判定来自赞比亚的原料供应链为低风险。

2. Regarding raw materials from Zambia, *the United Nations Office of the High Commissioner for Human Rights (OHCHR)* has highlighted the risk of human rights violations related to child labor in the Copperbelt Province. We conducted the following three investigations:

a. We reviewed publicly available information and found no third-party allegations of human rights violations against Kansanshi Mining Company or CCS Smelter.

b. We examined the companies' official websites and found that they have established corresponding management systems, explicitly stating compliance with *the United Nations Guiding Principles on Business and Human Rights (UNGPs)*, prohibiting forced labor and child labor, and requiring suppliers to complete a *Code of Conduct*.

c. We reviewed the companies' official websites and found that Kansanshi has participated in and passed IRMA audits, while CCS publishes annual sustainability reports and discloses their contents publicly. Therefore, the risk of human rights violations is classified as low-risk.

In summary, the supply chain for raw materials from Zambia is classified as low-risk.

3. 根据世界遗产地列表识别到菲律宾伊富高省(Ifugao) 的 5 个区域(Batad、Bangaan、Hungduan、Mayoyao、Nagacadan) 被科迪勒拉水稻梯田世界遗产地核心区覆盖, 但 2024 年我们采购的原料为来自本格特省 (Benguet), 距其核心区直线距离约 150 公里, 排除来自世界遗产地的风险; 关于 FATF 的灰名单成员国, 我们从以下三个方面进行了深入排查: a、我们查询了公开信息发现, philex 矿业公司并无涉及关于洗钱或腐败的任何第三方指控; b、我们查询了公司官网的公开信息, 公司的《治理手册》中关于治理政策中明确了遵守菲律宾《反洗钱法》以相关国际法律条款; c、我们查阅了公司官网, 发现公司每年定期发布财务报表, 财务数据公开透明, 并且每季度参与美国证券交易所 SEC、菲律宾证券交易所 PEC 要求的相关信息披露, 因此判定其涉及洗钱的金融风险为低风险。

综上判定来自菲律宾的原料供应链为低风险。

3. Based on the *World Heritage Site list*, five regions in Ifugao Province (Batad, Bangaan, Hungduan, Mayoyao, and Nagacadan) are covered by the core area of the *Cordillera Rice Terraces World Heritage Site*. However, the raw materials we procured in 2024 were sourced from Benguet Province, approximately 150 kilometers in a straight line from the core area, thus excluding risks related to World Heritage Sites.

Regarding the *FATF grey list*, we conducted an in-depth investigation from the following three aspects:

a. We reviewed publicly available information and found no third-party allegations of money laundering or corruption against Philex Mining Corporation.

b. We examined the company's official website and found that its *Governance Manual* explicitly states compliance with the *Philippines Anti-Money Laundering Act* and relevant international legal provisions.

c. We reviewed the company's official website and found that it regularly publishes financial statements with transparent financial data and participates in quarterly disclosures required by the U.S. Securities and Exchange Commission (SEC) and the Philippine Stock Exchange (PSE). Therefore, the financial risks related to money laundering are classified as low-risk.

In summary, the supply chain for raw materials from the Philippines is classified as low-risk.

4. 根据欧盟 CAHRAS 清单，哥伦比亚涉及毒品的武装冲突，原产地供应商并无涉及此问题，故排除其来自武装冲突的风险；根据世界遗产地列表识别位于卡克塔省（Caquetá）和瓜维亚雷省（Guaviare）的 Chiribiquete 国家公园为世界自然与文化双重遗产，2024 年我们采购原料来自安蒂奥基亚省（Antioquia）的 El Carmen de Atrato 市，两地直线距离约 500 公里，排除其来自世界遗产地的风险。

综上判定来自哥伦比亚的原料供应链判定为低风险；

4. According to the *EU CAHRA list*, Colombia is associated with armed conflicts related to drug trafficking. However, the origin supplier is not involved in this issue, thus excluding risks related to armed conflict. Based on the *World Heritage Site list*,

the Chiribiquete National Park in Caquetá and Guaviare provinces is recognized as a *World Natural and Cultural Heritage Site*. In 2024, the raw materials we procured were sourced from El Carmen de Atrato in Antioquia Province, approximately 500 kilometers in a straight line from the heritage site, thus excluding risks related to *World Heritage Sites*.

In summary, the supply chain for raw materials from Colombia is classified as low-risk.

2.3 关于高风险供应链的强化尽职调查

根据 LBMA 白银指南要求，若供应链经评估涉及高风险问题，则触发强化尽职调查程序。2024 年度期间公司白银供应链经审查并未出现高风险供应链，所以未触发强化尽职调查。

2.3 Enhanced Due Diligence for High-Risk Supply Chains

In accordance with the *LBMA Responsible Silver Guidance*, if a supply chain is assessed to involve high-risk issues, the Enhanced Due Diligence (EDD) procedure is triggered. During 2024, the company's silver supply chain was reviewed, and no high-risk supply chains were identified. Therefore, the EDD procedure was not triggered.

公司从严控供应链风险出发，根据 LBMA 白银指南规定的内容制定了管理办法，明确了对触发强化尽职调查的供应链依据材料类型启动对应的 EDD 措施，进而识别高风险供应链所涉风险性质——按冲突、环境、社会、治理等主题划分，并根据相应的风险启动风险管理策略。对于单个供应商的强化尽职调查将会每年度至少进行一次。

To strictly control supply chain risks, the company has developed management measures based on the *LBMA Responsible Silver Guidance*, clearly defining the corresponding EDD measures to be initiated for supply chains that trigger EDD based on material types. This helps identify the nature of risks associated with high-risk supply chains—categorized by themes such as conflict, environment, society, and governance—and implement risk management strategies accordingly. Enhanced Due Diligence for individual suppliers will be conducted at least once annually.

第三步：设计和实施应对已识别风险的策略

步骤 3 的合规性概述：在截至 2024 年 12 月 31 日，公司完全遵守了步骤 3：设计和实施应对已识别风险的策略。

根据 2024 年风险评估结果，我们未发现供应链存在高风险行为，故 2024 年度并未启动风险管理策略以及采取相应的风险减缓措施。但公司根据《LBMA 负责任白银指南》的要求，制定了相应的《白银供应链尽职调查风险缓解策略》。

Step 3: Design and Implement Strategies to Respond to Identified Risks
Compliance Overview for Step 3: As of December 31, 2024, the company has fully complied with Step 3: Design and Implement Strategies to Respond to Identified Risks.

Based on the 2024 risk assessment results, no high-risk behaviors were identified in the supply chain. Therefore, no risk management strategies or corresponding risk mitigation measures were initiated in 2024. However, in accordance with the requirements of the LBMA Responsible Silver Guidance, the company has developed the "Silver Supply Chain Due Diligence Risk Mitigation Strategy."

3.1 风险应对措施

当识别到来自零容忍风险供应链，我们会立即终止与该供应商的合作，并及

时报告 LBMA 或有关部门。

当识别到来自高风险供应链，将触发强化尽职调查措施，我们将根据强化尽职调查的结果，汇报合规办公室主任重新审批该供应链，考虑暂停或维持与该供应商的合作，并及时与其沟通，要求尽快制定相应的风险管理计划，跟踪改进情况并汇报合规办公室，根据其期限内的整改效果或最终整改结果确定暂停合作或维持合作的决定。

3.1 Risk Response Measures

For zero-tolerance risk supply chains: We will immediately terminate cooperation with the supplier and promptly report to the LBMA or relevant authorities.

When a high-risk supply chain is identified, Enhanced Due Diligence (EDD) measures will be triggered. Based on the results of the EDD, we will report to the Director of the Compliance Office for re-approval of the supply chain. We will consider suspending or maintaining cooperation with the supplier, communicate promptly, and request the supplier to develop a corresponding risk management plan as soon as possible. We will track the improvement progress and report to the Compliance Office. Based on the effectiveness of the corrective actions or final results within the specified period, a decision will be made to either suspend or continue cooperation.

3.2 跟踪风险管理计划

我们将根据以下三步开展对供应商风险管理计划的跟踪工作：

3.2 Monitoring Risk Management Plans

We will monitor supplier risk management plans through the following three steps:

第一步：确定风险管理计划中针对风险来源的主要措施和限定整改的时间

（一般为 3-6 个月）并确立绩效衡量指标；根据风险管理计划执行过程中取得的初步进展，对计划进行适当的修订或界定额外的措施；在最后整改期限前对供应商风险情况进行最终评估，具体评估措施（独立审计、实地评估、远程审查）视情况而定。

Step 1: Define the primary measures in the risk management plan to address the risk sources and set a remediation timeline (generally 3-6 months), while establishing performance measurement indicators. Based on the preliminary progress made during the execution of the risk management plan, revise the plan or define additional measures as appropriate. Conduct a final assessment of the supplier's risk status before the remediation deadline, with specific assessment measures (independent audits, on-site evaluations, remote reviews) determined based on the situation.

第二步：为了促进跟踪风险管理计划的效果，我们将在适当的情况下咨询相关利益相关方（如中央或地方主管机构、上游企业、国际或民间社会组织及受影响的第三方）。

Step 2: To enhance the monitoring of the effectiveness of the risk management plan, we will consult relevant stakeholders (e.g., central or local competent authorities, upstream companies, international or civil society organizations, and affected third parties) where appropriate.

第三步：在 3-6 个月整改工作后，若供应商并未制定风险管理计划或制定后未有效执行，我们会考虑终止与供应商的合作（由合规管理委员会审批）；若供应商有根据风险管理计划的工作实绩，但风险整改取得的效果有限或几乎没有效果，我们会考虑暂停与供应商的合作（由合规管理委员会审批），直至供应商就整改结果做出相关回应。

Step 3: After the 3-6 month remediation period: If the supplier has not developed a risk management plan or has failed to implement it effectively, we will consider terminating cooperation with the supplier (subject to approval by the Compliance Management Committee). If the supplier has implemented the risk management plan

but achieved limited or negligible results in risk remediation, we will consider suspending cooperation with the supplier (subject to approval by the Compliance Management Committee) until the supplier responds appropriately to the remediation outcomes.

3.3 将调查结果报告给合规管理委员会

合规管理办公室整理并汇总了 2024 年所有的尽职调查材料，并提交给办公室主任进行审核，未发现来自零容忍、高风险的供应链，故并未触发强化尽职调查。合规管理办公室汇总全年尽职调查结果，得出全年供应链为低风险的结论，并整理了白银供应链风险评估汇报表，向合规管理委员会汇报并得到审批。

3.3 Reporting Investigation Results to the Compliance Management Committee

The Compliance Management Office compiled and summarized all due diligence materials for 2024 and submitted them to the Director of the Compliance Office for review. No zero-tolerance or high-risk supply chains were identified, and therefore, Enhanced Due Diligence (EDD) was not triggered. The Compliance Management Office aggregated the annual due diligence results, concluding that the supply chain was low-risk throughout the year. A Silver Supply Chain Risk Assessment Report was prepared and submitted to the Compliance Management Committee for review and approval.

第四步：安排对供应链的尽职调查进行独立第三方审计

第 4 步的合规性概述：公司已完全遵守第 4 步：对白银供应链的尽职调查进行独立第三方审计。

Step 4: Arrange Independent Third-Party Audits for Supply Chain Due Diligence

Compliance Overview for Step 4: The company has fully complied with Step 4: Independent Third-Party Audit of the Silver Supply Chain Due Diligence.

公司严格遵守《LBMA 负责任的白银指南》第四步“对精炼厂的尽职调查实践开展独立的第三方审计”的要求。上一次审计时间为 2024 年 1 月。

The company strictly adheres to the requirements of Step 4: Independent Third-Party Audit of the Refiner's Due Diligence Practices in the LBMA Responsible Silver Guidance. The last audit was conducted in January 2024.

本年度我们将继续请必维认证（北京）有限公司上海分公司进行合理鉴证，本年度的审计将参照 ISAE3000 的方法执行。公司与必维认证（北京）有限公司上海分公司（以下简称“必维认证”）签订了一份协议，委托 BV 依据 ISAE3000 进行了 2024 年度的合理保证鉴证业务，对我们遵守 LBMA 责任白银指南的合规性进行独立第三方审计。

This year, we will continue to engage Bureau Veritas Certification (Beijing) Co., Ltd. Shanghai Branch to perform a reasonable assurance engagement. The audit for this year will be conducted in accordance with the ISAE 3000 methodology. The company has signed an agreement with Bureau Veritas Certification (Beijing) Co., Ltd. Shanghai Branch (hereinafter referred to as "Bureau Veritas") to commission BV to perform a reasonable assurance engagement for 2024 under ISAE 3000, conducting an independent third-party audit of our compliance with the LBMA Responsible Silver Guidance.

2024 年 1 月 BV 认证公司对我司进行了审计，在这次审计中提出了一个低风险不符合项：审查了 LBMA 尽职调查政策和流程的培训记录，发现财务和 2 名采购人员缺席了会议。此项不符合项的整改已于 2024 年度的培训中完成整改，公司各部门的合规管理关键人员均在 2024 年 9 月 12 日出席并完成了此次培训，在 2025 年 2 月份，BV 认证公司审查并通过了关于培训的所有记录材料。

In January 2024, Bureau Veritas (BV) conducted an audit of our company. During this audit, a low-risk non-conformity was identified: a review of the training records for the LBMA Due Diligence Policies and Procedures revealed that personnel from the finance department and two procurement staff members were absent from the training session. This non-conformity was rectified during the 2024 training sessions. Key compliance personnel from all departments attended and completed the training on September 12, 2024. In February 2025, Bureau Veritas reviewed and approved all training records and materials.

2025 年 2 月份我们继续委托 BV 认证公司对我司开展 2024 年度的供应链尽职调查审计, 在此次审计中针对公司供应链尽职调查体系的运行以及合规报告的内容完整性提出了两项中风险不符合项, 一项低风险不符合项。

In February 2025, we continued to engage Bureau Veritas (BV) to conduct the 2024 annual supply chain due diligence audit for our company. During this audit, two medium-risk non-conformities and one low-risk non-conformity were identified regarding the operation of the company's supply chain due diligence system and the content integrity of the compliance report.

对此, 我们将采取相应措施加强体系的日常运行, 落实到各部门供应链合规责任人员, 且进一步完善合规报告披露内容。我们将在审计结束后的 90 天内完成整改, 并将相关材料提交给审计公司。

In response, we will implement corresponding measures to strengthen the daily operation of the system, assign responsibilities to compliance personnel in each department, and further enhance the content disclosure of the compliance report. We

will complete the rectifications within 90 days after the audit conclusion and submit the relevant materials to the auditing firm.

第五步：每年报告一次供应链尽职调查

第 5 步的合规性概述：公司完全遵守了第 5 步：供应链尽职调查年度报告。

公司根据《LBMA 负责任的白银指南》发布了《金隆铜业有限公司白银尽职调查合规报告（2024 年）》，此报告汇报了截至 2024 年 12 月 31 日的关于公司白银供应链尽职调查情况。并在公司官网公开披露 <http://www.jinlongcopper.com/information/infoabout.aspx?parentclassid=406&classid=467>，同时也发布了 2023 年度独立审计报告以及合规证书，以方便利益相关方查看或下载。

Step 5: Annual Reporting on Supply Chain Due Diligence

Compliance Overview for Step 5: The company has fully complied with Step 5: Annual Reporting on Supply Chain Due Diligence.

In compliance with the LBMA Responsible Silver Guidance, Jinlong Copper Co., Ltd. has published the "Jinlong Copper Co., Ltd. Silver Due Diligence Compliance Report (2024)", which documents the company's silver supply chain due diligence status as of December 31, 2024. The report has been publicly disclosed on the company's official website:

<http://www.jinlongcopper.com/information/infoabout.aspx?parentclassid=406&classid=467>. Additionally, the 2023 Independent Audit Report and Compliance Certificate have been published to facilitate stakeholder review and download.

三、管理结论

截至 2024 年 12 月 31 日，公司在遵循已建立的供应链过程和控制的管理体系的基础上，密切关注新版指南的最新要求并积极响应，及时更新尽职调查管理政策。公司还收集了所有供应商信息，识别并评估了供应链中的风险，制定了风险控制措施，安排对供应链尽职调查进行独立第三方审计，同时在公司官网公

布政策制度、管理办法等相关文件，并在 2024 年编制了供应链尽职调查报告。

III. Management Conclusion

As of December 31, 2024, the company has closely monitored the latest requirements of the new edition of the Guidelines and actively responded by promptly updating its due diligence management policies, while adhering to the established management system for supply chain processes and controls. The company has also collected all supplier information, identified and assessed risks in the supply chain, formulated risk control measures, arranged for independent third-party audits of supply chain due diligence, published policy documents and management measures on the company's official website, and compiled the Supply Chain Due Diligence Report in 2024.

但是通过今年的第三方审计，我们注意到尽职调查体系在运行效能方面尚有进一步优化的空间。为此，我们将结合审计建议，在现有框架基础上通过流程细化、标准强化等方式，持续提升工作质效，进一步满足《LBMA 负责任的白银指南》的要求。

However, through this year's third-party audit, we noted that there is still room for further optimization in the operational efficiency of the due diligence system. To address this, we will integrate audit recommendations to continuously improve the quality and effectiveness of our work within the existing framework through process refinement and standard reinforcement, thereby further meeting the requirements of the LBMA Responsible Silver Guidance.

在下一阶段的工作中，公司致力于在现有白银供应链尽职调查制度的基础上持续改进，将负责任采购理念和尽职调查管理工作融入公司内部管理制度、程序、流程和实践，将定期对发现的任何纠正措施进行内部监控。

In the next phase, the company is committed to continuously improving its existing silver supply chain due diligence system by integrating responsible sourcing principles and due diligence management into internal management systems,

procedures, processes, and practices. Regular internal monitoring will be conducted for any corrective actions identified.

四、其他

如果本报告用户希望就本报告向金隆铜业有限公司进行任何反馈,则可以通过拨打+86 0562-3868888 或发送电子邮件至 [jcc @jinlongcopper.com](mailto:jcc@jinlongcopper.com), 联系公司相关部门。

IV. Additional Information

If users of this report wish to provide feedback to Jinlong Copper Co., Ltd., they may contact the relevant department via phone at +86 0562-3868888 or email at jcc@jinlongcopper.com.