

深圳市点金贵金属精炼有限公司
Shenzhen Point Gold Refining Co., Ltd.

LPPM

2022 年度
Year 2022

供应链尽职管理合规报告
Due Diligence Management Compliance
Report of Supply Chain

2023 年 1 月 4 日

January 4, 2023

公司名称：深圳市点金贵金属精炼有限公司

Company name: Shenzhen Point Gold Refining Co., Ltd.

**位 置：深圳市宝安区石岩街道上屋社区坑尾大道 35 号磁通厂厂
房 1 一层**

**Address: 1/F., Citong Factory Building 1, No.35 Kengwei Boulevard,
Shangwu Community, Shiyan Sub-district, Baoan District, Shenzhen
City, Guangdong Province, 518108 China**

年终报告：2022 年度 LPPM 供应链尽职管理合规报告

**Year-end report: LPPM Due Diligence Management Compliance
Report of Supply Chain for Year 2022**

报告日期：2023 年 1 月 4 日

Report date: January 4, 2023

报告负责人：施巍

Person in charge of the Report: Shi Wei

报告人职务：合规风控总监 13066888690@163.com

**Title of Reporter: Compliance Risk Control Director
13066888690@163.com**

一、公司概况

I. Company profile

深圳市点金贵金属精炼有限公司（以下简称点金贵金属）成立于 2015 年，注册资本 1.5 亿人民币。公司立足于贵金属深加工及贸易，涉及了贵金属精炼的创新、再生、安全环保、绿色发展及智慧社会等各个方面，形成了经济效益高和研发能力高的“双高”企业优势。与此同时，点金贵金属持有多个国家政策性准入牌照和资质，为企业未来发展奠定了坚实的基础！

Shenzhen Point Gold Refining Co., Ltd. (hereinafter referred to as Point Gold) was established in 2015 with a registered capital of RMB 150 million. Relying on the deep processing and trade of precious metals, Point Gold engages in all aspects of precious metal refining, such as innovation, regeneration, safety and environmental protection, green development and smart society, forming a “double-high” enterprise advantage with high economic efficiency and high R & D capability. Meanwhile, Point Gold is provided with a number of national policy access licenses and qualifications, which lays a solid foundation for the future development of the enterprise!

点金贵金属工厂地处宝安区石岩街道坑尾大道 35 号，厂内拥有上百名专业人员，整个生产流程可实现 70%自动化，并有针对性的解决生产环节涉及的环保、金资源综合回收、生产废水零排放三大技术难题，形成黄金产业的循环经济发展模式。产品生产线涵盖金、银、钯、铂等贵金属，数十种形态品质，上百种规格。点金工厂设备先进，技术领先。截至目前，点金贵金属铂金提纯量年可达到 1.5 吨以上，

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The Factory of Point Gold is located in No.35 Kengwei Boulevard, Shangwu Community, Shiyan Sub-district. The plant is equipped with hundreds of professionals. The whole production process can be 70% automated and is targeted to solve the three technical problems involved in the production process: environmental protection, comprehensive recovery of gold resources and zero discharge of production wastewater, forming a circular economy development model of the gold industry. The product production line covers precious metals such as gold, silver, palladium and platinum with dozens of forms and qualities and hundreds of specifications. The Factory of Point Gold is equipped with advanced equipment and leading technique. The annual platinum purification capacity and the annual palladium purification capacity of Point Gold can reach more than 1.5 tons respectively until now.

二、供应商情况概述

II. Overview of suppliers

公司铂钯原料主要来源是从社会中回收的铂钯含量在 95%左右的铂钯原料及铂钯旧首饰料等。

Platinum and palladium raw materials of the Company are mainly from platinum and palladium raw materials with platinum and palladium content around 95% recovered from the society and old platinum and palladium jewelry materials.

三、合规情况概述

III. Overview of compliance

公司对所有供应商进行尽职的供应链调查，要求所有供应商提供的原料来源合法、合规。

The Company conducted the due diligence supply chain investigation on all suppliers and required that the sources of the raw materials provided by all suppliers shall be legal and compliant.

第一步 建立强大的公司管理体系

Step 1: Establish strong company management systems

合规声明与要求：

Compliance Statement with Requirement:

我们公司已经充分遵守第 1 步骤：建立强大的公司管理体系。

We have fully complied with Step 1: Establish strong company management systems.

公司严格遵守 LPPM 铂钯责任指南第一步“建立强大的公司管理体系”的要求，已经建立了强大的管理体系，确保供应链尽职调查工作全面落地。

The Company strictly abided by the requirements of “establishing strong company management systems” in Step 1 of LPPM Responsible Platinum and Palladium Guidance and has established strong management systems to ensure the full implementation of the supply chain due diligence.

1.政策方面

1. Policy aspect

公司通过并出台了《铂钯负责任采购供应链尽职调查政策》，该政策包含了经济合作与发展组织发布的《来自受冲突影响和高风险地区的矿石负责任供应链尽职调查指南》中所列出的所有风险并扩展至

与环境、社会和治理方面的风险，该政策在企业内外部公布于官网链接：<http://www.kmfgold.com/news/gongsixinwen/149.html>，并已经传达给所有的铂金和钯金供应商，所有的传达记录也被存档保留。

The Company adopted and issued the *Due Diligence Policy for Platinum and Palladium Responsible Procurement Supply Chain* which covers all risks listed in the *Due Diligence Guide for Responsible Supply Chain of Ore from Conflict-Affected and High-Risk Areas* issued by the Organization for Economic Cooperation and Development and extends to the risks concerning environment, society and governance. The Policy is published inside and outside the enterprise on the official website with link of <http://www.kmfgold.com/news/gongsixinwen/149.html> and has been communicated to all platinum and palladium suppliers with communication records kept on file.

政策要求公司及其供应商严格遵守国家关于职工权利、环境保护、公平交易等各项法律法规，积极参与供应链尽职调查工作，确保矿产铂钯、再生铂钯来源符合 LPPM 尽职调查管理要求，并作出承诺，对涉及侵犯人权、冲突地区、贿赂、洗钱、恐怖主义融资、非法开采、世界遗产遗址等高风险地区的铂钯进行风险管理，确保铂钯的负责任采购。同时，公司建立的申诉渠道也列入了政策中以识别供应链中任何其它潜在的风险。

The Policy requires the Company and its suppliers 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 platinum and palladium and recycled platinum and palladium meet the LPPM's due diligence management requirements. Besides, The Policy requires the Company and its suppliers to make a commitment to manage risks of platinum and palladium in high-risk areas involving human rights violations, conflicts, bribery, money laundering, terrorist financing, illegal mining and world heritage sites. Besides, the complaint channels established by the Company are also included in the Policy to identify any other potential risks in the supply chain.

2.管理架构

2. Management structure

公司已经建立了内部管理制度，按照出台的政策对管理、作用和职责、内部审计、沟通进行界定、并开展尽职调查体系的管理评审。The Company has established an internal management system to define the management, roles and responsibilities, internal audit and communication according to the issued policy while carrying out the management review of due diligence system.

2.1 规章制度方面

2.1 Rules and regulations

公司根据《LPPM 负责的铂钯指南》制订了《供应链尽职管理制度》《供应链尽职管理政策》，主要明确供应链尽职调查组织架构、职责、高风险地区定义，制定高风险供应链评估标准、调查处理程序、交易监控、文件保存等内容。上述制度通过合规风控总监、董事长、董事会审批后以红头文件的形式下发，作为文控处理。

The Company has formulated the *Due Diligence Management*

Regulations of Supply Chain and Due Diligence Management Policy of Supply Chain according to the *LPPM Responsible Platinum and Palladium Guidance*, which mainly clarifies the organizational structure, responsibilities and definition of high-risk areas of supply chain due diligence and formulates high-risk supply chain evaluation standards, investigation and handling procedures, transaction monitoring, document preservation, etc. The above systems shall be issued in the form of official documents after being approved by the Compliance Risk Control Director, Chairman and Board of Directors as document control.

2.2 职责与权限

2.2 Responsibility and authority

公司设置合规风控总监、合规风控专员、合规专员。

The Company sets Compliance Risk Control Director, Compliance Risk Control Officer and Compliance Officer.

合规风控总监由公司副总经理负责公司供应链尽职调查工作，建立健全供应链尽职调查管理体系，监督供应链尽职调查流程，协调处理供应链尽职调查中的异常情况，审批合规报告。

The Compliance Risk Control Director is in charge of the Company's supply chain due diligence by the Company's Deputy General Manager. Specifically, the Compliance Director is responsible for the establishment and improvement of the due diligence management system of supply chain, the supervision of the supply chain due diligence process, the coordination and handling of abnormalities in the supply chain due diligence and the approval of the Compliance Report.

合规风控专员指定营运板块的财务部负责人担任，负责有关供应链尽职调查管理的所有事项。负责制定并更新供应链尽职调查政策、制度，负责制定高风险供应链评判标准和执行供应链尽职调查措施，指导、协调、报告公司风险评估、应对和实施等情况，监督、检查各部门的落实情况并考核，汇报供应链尽职调查中的异常情况。同时，对供应链尽职调查进行审核，并评估尽职调查是否充分，必要时收集额外文件或信息。负责有关责任供应链的员工培训，编制并更新供应链政策，并向高级管理人员提供用于履行职责的适当信息。

The Compliance Risk Control Officer is the person in charge of the Finance Department of the operation sector to be responsible for all matters related to the due diligence management of supply chain. Specifically, the Compliance Risk Officer takes charge of the formulation and updating of the supply chain due diligence policies and systems, the formulation of the high-risk supply chain evaluation standards and the implementation of the supply chain due diligence measures, the guidance, coordination and reporting of the Company's risk assessment, response and implementation, the supervision and check of the implementation and assessment of all departments and the reporting of abnormalities in supply chain due diligence. At the same time, the Compliance Risk Officer is responsible for the review of the supply chain due diligence, the assessment on whether the due diligence is sufficient, the collection of additional documents or information if necessary, the organization of employee training on the responsible supply chain, the preparation and updating of supply chain policies and the supply of appropriate

information for the senior managers to perform their duties.

合规专员由业务部、物流部、财务部、化验室负责人组成，负责严格执行供应链尽职调查措施和高风险供应链评判标准，收集并保存足够的供应链证明文件，建立供应商尽职调查档案，并定期对重要供应商进行现场调查。

The Compliance Officer is appointed by the Business Department, Logistics Department, Finance Department and the Factory and is responsible for the strict implementation of the supply chain due diligence measures and high-risk supply chain evaluation standards, the collection and retention of sufficient supply chain supporting documents, the establishment of supplier due diligence files and the regular on-site investigation on important suppliers.

公司制定了对合规风控专员、合规专员的问责机制，通过监督与检查，确保供应链尽职调查工作得到有效的实施，规避高风险供应链的交易。要求相关专员定期向高级管理人员汇报供应链尽职调查情况，并及时召开内部会议。

The Company has established an accountability mechanism for the Compliance Risk Control Officer and the Compliance Officer to ensure the effective implementation of supply chain due diligence and avoid high-risk supply chain transactions through supervision and inspection. Officers concerned are required to regularly report the supply chain due diligence to senior managers and convene internal meetings in time.

公司在2023年1月3日对公司2022年度铂金钯金的尽职调查管理体系进行了管理评审，输出了管理评审报告并将该报告汇报给了合

规风险总监和高级管理层。

On January 3, 2023, the Company implemented a management review on due diligence management system of the Company for platinum and palladium in 2022, and output a management review report which was submitted to the Compliance Risk Director and senior management.

3.强有力的内部追溯体系

3. Strong internal traceability systems

公司建立了一套供应链可追溯体系，收集和维护每一批产品的供应链信息，为每一批出库的产品分配唯一编号。

The Company has established a set of supply chain traceability systems for realizing the collection and maintenance of the supply chain information of each batch of products, and the distribution of a unique number to each batch of products out of the warehouse.

3.1 供应链可追溯体系

3.1 Supply chain traceability systems

所有的供应商都会被进行资信调查，通过尽职调查问卷收集和审查供应商资质、业务运营、股东信息和物料来源等资信调查通过后签订合同，约定原料合法，符合 LPPM 尽职调查政策；供应商送的每一批来料，都有入库单，表明产品类型、重量、验收人员和供应商签字确认；熔炼取样化验，最后形成标准铂钯锭，分配唯一编号。

The credit investigation will be implemented on all suppliers. After the credit investigation of collecting and reviewing the supplier qualification, business operation, shareholder information, material source through the due diligence questionnaire is passed, the contract will be signed to

stipulate that the raw materials are legal and in line with LPPM Due Diligence Policy. For each batch of incoming materials sent by the suppliers, it shall be provided with the corresponding ex-warehouse sheet, indicating the product type, weight, acceptance personnel and the supplier's signature for confirmation. After smelting, sampling and testing for the incoming materials, the incoming materials finally form standard platinum-palladium ingot with a unique number.

公司对所有交易情况进行监督，确保交易与供应链调查一致。

The Company will supervise all transactions to ensure the consistency between the transactions and the supply chain investigation.

公司对供应链尽职调查进行检查，每批来料编号唯一，生产可追溯，对于所有的原料入库均保留完整的单据资料，对于入库的铂钯料保存有入库单、检验单、财务凭证等。明确各个部门应在日常工作中收集保存的资料，由业务部、检测部、财务部对相关单据进行保存，并定期将相关资料送至档案室进行存档，保存期限均高于 5 年。

The Company will inspect the due diligence of the supply chain. Each batch of incoming materials will be provided with unique number and traceable production information. Complete documents and data will be kept for all raw materials warehousing, and the platinum and palladium materials received shall be provided with warehouse-in sheet, inspection sheet, financial vouchers, etc. Besides, it is necessary to clarify the data that each department should collect and save in daily work. The Business Department, Testing Department and Finance Department should save the relevant documents, and regularly send the relevant data to the archives

room for filing, with a retention period of over 5 years.

3.2 维护资料

3.2 Maintenance of data

在业务开展中，客户的身份证、身份验证资料、营业执照、资质验证资料、供应商尽职调查表、每一批次的入库单、出库单、检测单等相关记录保存 5 年以上。

In the process of the business operation, relevant records such as ID card of customers, identity verification data, business license, qualification verification data, the supplier due diligence questionnaire form, the in-warehouse sheet, ex-warehouse sheet and test sheet of each batch of materials shall be kept for more than 5 years.

3.3 培训

3.3 Training

公司每年将供应链尽职调查管理培训纳入公司年度培训计划当中，组织公司重点岗位以及合规专员对供应链尽职调查管理的要求、内容以及 LPPM 负责的铂钯指南进行培训，确保供应链尽职调查管理工作落到实处。2022 年 7 月 10 日与 11 月 8 日组织了两次对公司各相关部门人员与工厂管理人员、生产人员的 LPPM 相关知识培训。

The Company incorporates the due diligence management training of supply chain into the Company's annual training plan every year. The Company works on implementing the due diligence management of supply chain through organizing the Company's key posts and Compliance Officer to accept training regarding the requirements and contents of the due diligence management of supply chain and LPPM

Responsible Platinum and Palladium Guidance. Two times of training on LPPM-related knowledge were organized for the personnel of relevant departments of the Company and management personnel and production personnel of the Factory on July 10 and November 8, 2022.

3.4 通过官方银行渠道付款

3.4 Payment through official bank channels

公司在支付货款时，由市场部门发起资金事项联签程序，通过公司基本户所在的银行网上付款，并打印银行回单作为凭证附件保留以配合政府部门的监管。

When the Company pays for goods, the Marketing Department initiates the countersignature procedure for capital matters, makes online payment through the bank where the Company's basic account is located, and prints the bank receipt as a voucher attachment for the supervision of government departments.

3.5 环境、社会和治理（ESG）因素

3.5 Environmental, social and governance (ESG) factors

公司获得了 ISO 14001: 2015 和 ISO 45001:2018 的证书，并建立了环境和职业健康安全的管理程序。公司也建立了《突发环境事件应急预案》和《危害化学品管理程序》，同时《环境因素风险评估报告》也说明公司对环境的管控符合当地法规。公司主要采购回收铂和回收钯，因此不涉及到从世界遗产保护地采购。公司建立了《员工手册》来解决员工的劳工问题。公司所在地和生产地均未涉及到任何土地征用和社区安置，文化遗产地和土著人民，封闭规划和弱势群体的保护。公司也建立了支持采掘业透明度倡议(EITI)的管理程序，并在

2022年3月在公司内部为员工提供了培训。

The Company has obtained the certificates of ISO 14001: 2015 and ISO 45001:2018, and established the management procedures of environment and occupational health and safety. The Company has also established the *Emergency Plan for Sudden Environmental Events* and the *Management Procedure for Hazardous Chemicals*, and the *Risk Assessment Report for Environmental Factors* also indicates that environmental control of the Company conforms to local regulations. The Company mainly purchases recycled platinum and palladium, not involving procurement from world heritage sites. The Company has established the *Employee Handbook* to solve the labor problems of employees. The location and production place of the Company are not involved in any land expropriation and community resettlement, cultural heritage sites and indigenous people, closed planning and the protection of vulnerable groups. Furthermore, the Company has also established management procedures to support the Extractive Industries Transparency Initiative (EITI), and provided training for employees within the company in March 2022.

4.强化合作，协助铂钯供应链交易方建立尽职调查能力

4. Strengthen cooperation and assist the trading parties of the platinum and palladium supply chain to establish due diligence capability

公司鼓励与供应商建立基于信任和互认的长期关系，特别是遵守经合组织《来自受冲突影响和高风险地区矿石负责任供应链尽职调查指南》并扩展至环境和可持续性责任的供应商。

The Company encourages long-term relationships based on trust and mutual recognition with suppliers, especially those suppliers comply with the OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and extend to environmental and sustainability responsibilities.

公司将铂钯供应链的政策与要求通过电子邮件等方式传达给相关交易方。遵守供应链的要求也加入了与供应商签订的采购合同/代加工合同中。同时，为了最大程度的提升供应链交易方的尽职调查能力和实践，公司计划在 2023 年 2 月对供应商进行尽职调查的培训并分享公司的尽职调查经验。

The Company has conveyed policies and requirements of platinum and palladium supply chain to relevant transaction parties by e-mail. Compliance with the requirements of the supply chain has been added to the purchase contract/entrusted processing contract signed with suppliers as well. Besides, the Company plans to carry out due diligence training for suppliers in February 2023 and share due diligence experience of the Company, with a view to improving the due diligence ability and practice of supply chain transaction parties to the greatest extent.

公司所有供应商都签署《供应商社会责任承诺书》，承诺铂钯来源合法、合规，符合 LPPM 规定。对于公司销售的大客户要备案其下游客户的发票，规避偷逃税款风险。

All suppliers of the Company shall sign the *Supplier's Social Responsibility Commitment* to promise that the sources of platinum and palladium are legal and compliant in line with LPPM's regulations. Major customers trading with the Company shall have the invoices of their downstream customers filed to avoid the risk of tax evasion.

5. 建立机密申诉机制

5. Establish a confidential complaint mechanism

公司利用官方网站链接：

<http://www.kmfgold.com/news/gongsixinwen/151.html>，公布电话和邮箱，允许员工和外部利益相关者表达关于负责任供应链与采矿、贸易、加工和出口情况有关的疑虑对供应链或任何新的识别风险的担忧。公司建立了完善的申诉处理程序，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。

The Company uses the official website link: <http://www.kmfgold.com/news/gongsixinwen/151.html> to publish the telephone number and email and allow employees and external stakeholders to express their doubts about the responsible supply chain, mining, trade, processing and export, as well as concerns about the supply chain or any newly identified risks. Meanwhile, the Company has established excellent complaint handling procedures to protect employees' privacy throughout the appeal process and keep the informant's information confidential to further eliminate retaliation for any behavior.

2022 年公司未接到员工和外部利益相关者的申诉。

In 2022, the Company received no complaints from employees and external stakeholders.

第二步 供应链风险的识别与评估

Step 2: Identify and assess risk in the supply chain

合规声明与要求:

Compliance Statement with Requirement:

我公司已经充分遵守第 2 步骤:对供应链中的风险进行识别和评估。

We have fully complied with Step 2: Identify and assess risk in the supply chain.

公司严格遵守 LPPM 铂钯责任指南第二步“供应链风险的识别与评估”的要求，制定了受冲突影响和高风险区域的识别程序（包括标准、引用资源和流程），制定了高风险供应链的判定标准和对识别出来的风险的处理程序，充分对供应链中的风险进行识别、评估和缓解。2022 年度，公司来料均为来自国内回收铂钯，根据公司受冲突影响和高风险区域的识别程序判定中国为低风险区域，未发现高风险供应链。

The Company strictly abided by the requirements of “identifying and assessing risk in the supply chain” in Step 2 of LPPM Responsible Platinum and Palladium Guidance and has formulated the identification procedures (including standards, referenced resources and processes) for conflict-affected and high-risk areas, and the judgment standard of the high-risk supply chain as well as the treatment procedures for the

identified risks, so as to fully identify, evaluate and mitigate the risks in the supply chain. In 2022, the incoming materials of the Company were all from domestic recycled platinum and palladium, and China was determined as a low-risk area according to the identification procedures for the Company's conflict-affected and high-risk areas, no high-risk supply chain found.

1. 识别供应链风险

1. Identify supply chain risks

根据经合组织《来自受冲突影响和高风险地区矿石负责任供应链尽职调查指南》并扩展至环境和可持续性责任，铂钯冶炼公司识别相关风险，密切关注来自侵犯人权、武装冲突、非法开采及源于世界遗产遗址等地区的铂钯，以及用于贿赂、洗钱、恐怖主义融资等行为的铂钯。公司为每个供应商建立供应商档案，根据公司的风险状况进行了调查，在与其签合同之前完成供应商档案的建立工作。

According to the OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and the extension to environmental and sustainability responsibilities, platinum and palladium smelting companies identify relevant risks and pay close attention to platinum and palladium from places involving human rights violations, armed conflict, illegal mining and world heritage sites, as well as platinum and palladium used for bribery, money laundering, terrorist financing and other acts. The Company established supplier files for each supplier and conducted the investigation according to the Company's risk status. The Company completed the establishment of supplier files before

signing contracts with the suppliers.

2. 评估供应链风险

2. Assess supply chain risks

2.1 供应链调查

2.1 Supply chain investigation

公司通过以下措施对供应链进行尽职调查，并完成了尽职调查问卷：

The Company conducts due diligence on the supply chain through the following measures with the completed due diligence questionnaire:

(1) 资质验证。对于所有供应商均进行供应链的尽职管理调查，在进行合作前要求合作方提供相应的资质证明文件，法人客户提供营业执照，个人客户提供身份证复印件，受益人信息及其制裁清单验证结果，矿山客户还需要提供采矿许可证、环评认证以及关注矿工佩戴劳保、健康安全交易、职业病体检。

(1) Qualification verification. For all suppliers, the due diligence management investigation of the supply chain shall be conducted. Before cooperation, the partners are required to provide corresponding qualification certificates and the legal customers are required to provide business licenses. Individual customers are required to provide copies of ID cards, beneficiary information and verification results of sanctions list. Mine customers are required to provide mining licenses and environmental impact assessment certification and the miners are required to wear labour protection appliances, health and safety transactions and physical examination of occupational diseases.

(2) 建立供应商档案。对供应商基本情况、股东信息、实际控制人、供应商管理层架构、提供原料类型及产地、计划精炼贵金属类型、与其供应商结算方式、其供应商概况等信息进行详细调查，并尽可能的将供应链调查向供应商的上游延伸，最终确定其风险等级，对于涉及高风险标准的供应商终止合作。

(2) Establish supplier files. A detailed investigation is required to be carried out for the Supplier's basic information, shareholder information, actual controller, supplier management structure, type and origin of raw materials provided, type of precious metals planned to be refined, settlement method with suppliers, supplier profile and other information. The Company extends the supply chain investigation to the upstream of the supplier as far as possible to finally determine its risk level and terminates cooperation with suppliers involving high-risk standards.

(3) 建立来料登记簿。对供应商当批次来料的日期、重量、原料来源、主要上游供应商进行尽职调查，判断其来料风险等级。

(3) Establish the incoming material register. Due diligence is required to be carried out for the date, weight, raw material source and main upstream suppliers of the current batch of incoming materials of the supplier to further judge the risk level of incoming materials.

(4) 建立客户专项调研报告工作流程。在走访客户时，对原料来源进行追溯，向供应商传达铂钯冶炼公司尽职管理政策，并要求其在政策上签字。

(4) Establish the workflow of special research reports about customers. When visiting customers, the Company traces the source of

raw materials and conveys the due diligence management policy of platinum and palladium smelting companies to suppliers. Besides, the customers are required to sign the policy.

公司通过《了解您的供应商问卷》对供应商上述信息的收集和识别，未识别出高风险的供应商。

The Company failed to identify high-risk suppliers after collecting and identifying the above information of suppliers through the *Know Your Supplier Questionnaire*.

2.2 受冲突影响和高风险地区的判定。公司制定了受冲突影响和高风险地区的识别流程。公司将列入欧盟的受冲突影响和高风险地区清单、多德弗兰克法案中指明的国家、FATF 国际反洗钱和反恐融资组织的灰名单中的国家/地区定为高风险国家/地区。公司制定了红旗警示信号的识别流程，因为供应链中没有受冲突影响和高风险地区被识别出来，因此没有识别出红旗警示信号。

2.2 Determination of conflict-affected and high-risk areas. The Company has developed an identification process for conflict-affected and high-risk areas. The Company identifies the countries/regions included in the list of conflict-affected and high-risk areas of the European Union, the countries specified in the Dodd-Frank Act and the included in the FATF gray list as the high-risk countries/regions. The Company has established a red flag warning signal identification process.

As no conflict-affected and high-risk areas in the supply chain have been identified, the red flag warning signal has not been identified.

2.3 高风险供应链

2.3 High-risk supply chain

根据 LPPM 相关规定，结合公司实际情况，特规定如下高风险供应链评判标准：

According to the relevant regulations of LPPM and in combination with the actual situation of the Company, the following judgment criteria for a high-risk supply chain are specially specified:

- 识别出以下任何红旗警示信号：

- Any one of the following red flag warning signal is identified:

(1) 开采铂/钯或回收铂/钯源自、中转经过或运输经过受冲突影响和高风险地区或人权滥用地区；

(1) Mined platinum/palladium or recovered platinum/palladium originates from, transits through or is transported through conflict-affected and high-risk areas or areas where human rights are abused;

(2) 开采铂/钯据称源自已知铂/钯储量、潜在铂/钯资源或预期铂/钯产量有限的国家；

(2) Mined platinum/palladium is said to originate from countries with known platinum/palladium reserves, potential platinum/palladium resources or limited expected platinum/palladium production;

(3) 回收铂/钯的原产国已知或合理预期来自受冲突影响和高风险地区的铂/钯将经此地区中转，和/或有理由怀疑回收铂/钯源自铂/钯出口量有限的国家，或铂/钯供应商或其他已知上游公司位于洗钱风险较高的国家；

(3) The country of origin of the recovered platinum/palladium knows or reasonably expects that platinum/palladium from conflict-affected and high-risk areas will transit through this area, and/or has reason to suspect that the recovered platinum/palladium originates from countries with limited platinum/palladium exports, or that platinum/palladium suppliers or other known upstream companies are located in countries with high money laundering risks;

(4) 铂/钯供应商或其他已知上游公司或其最终受益所有人对铂/钯供应商有重大影响，且是政治敏感人物；

(4) Platinum/palladium suppliers or other known upstream companies or their ultimate beneficial owners have great influence on platinum/palladium suppliers and are politically sensitive;

(5) 铂/钯供应商或其他已知上游公司积极参与高风险商业活动，如武器、赌博和博彩业、古董和艺术品、宗教和宗教领袖；

(5) Platinum/palladium suppliers or other known upstream companies actively participate in high-risk commercial activities, such as weapons, gambling and gambling, antiques and artworks, religions and religious leaders;

(6) 在供应链中，供应商或交易对手的地理路线因不明原因无法解释；

(6) The geographical route of suppliers or counterparties in the supply chain cannot be explained for unknown reasons;

- 任何供应链政策当中的风险被识别出：
- Any risk in the supply chain policy is identified:

1、 与铂钯开采、运输和交易的过程中，系统性或广泛化的侵犯人权的行爲，这包括：

1. Systematic or extensive human rights violations in the process of mining, transporting and trading of platinum and palladium, including:

a) 任何形式的酷刑、或不人道和有辱人格的待遇

a) Any form of torture or inhuman and degrading treatment

b) 强迫或强制性劳动

b) Forced or compulsory labour

c) 最恶劣形式的童工

c) Worst forms of child labour

d) 广泛的性暴力或其他严重侵犯人权的行爲

d) Widespread sexual violence or other serious violations of human rights

e) 战争罪，反人类罪或种族灭绝罪；

e) War crimes, crimes against humanity or genocide;

2、 直接或间接的支持非政府武装集团、公共或私人安全部队，购买贵金属或提供协助的（参考 OECD 冲突影响地区和高风险地区矿产供应链尽职调查指南铂钯附录中的定义）；

2. Directly or indirectly supporting non-governmental armed groups,

public or private security forces, purchasing precious metals or providing assistance (refer to the definition in the Appendix of Platinum and Palladium to Due Diligence Guide for Mineral Supply Chains in Conflict-Affected Areas and High-Risk Areas of OECD);

3、 贿赂而来或者是掩盖铂钯真实来源;

3. Bribery or covering up the true source of platinum and palladium;

4、 存在洗钱或自高风险、冲突地区采购贵金属;

4. Money laundering is found or precious metals are purchased from high-risk and conflict areas;

5、 存在恐怖主义融资;

5. There is terrorist financing;

6、 存在加剧冲突;

6. Conflicts are aggravated;

7、 对环境的影响;

7. There is impact on the environment:

a) 可能不遵守环境和可持续发展法律要求, 开采铂钯源于世界遗产遗址或国内生态自然保护区;

a) Related suppliers may not follow requirements of environmental and sustainable development laws, and the platinum and palladium mined originates from world heritage sites or domestic ecological nature reserves;

b) 存在矿产资源开发过程中引起的土壤侵蚀、水土流失、土地沙漠化。地面沉降、塌陷, 山体崩塌、滑坡、泥石流等地质灾害;

b) There is soil erosion, water and soil loss, land desertification,

ground subsidence, collapse, mountain collapse, landslide, debris flow and other geological disasters caused by the development of mineral resources;

c) 存在废渣、废水、废气排放对水体、土壤、空气的污染。对野生动植物资源和自然地质地貌景观的破坏、危及公民健康和财产损害;

c) Water, soil and air are polluted by waste residue, waste water and waste gas. Damage to wildlife resources and natural geological landscapes is found, with health of citizens endangered and property damage caused;

d) 对有毒有害化学物品的安全存储。

d) Safe storage of toxic and harmful chemicals is found.

8、 对劳工的管理，包括工人的薪酬、工作时间、集体谈判、歧视，多样性、纠纷和工人权益保障;

8. Labor management, including workers' salary, working hours, collective bargaining, discrimination, diversity, disputes and protection of workers' rights and interests;

9、 社区参与和管理方案

9. Community participation and management scheme

10、 管理商业诚信和道德行为，我公司支持并遵守采掘业透明度倡议（EITI）。

10. Management for business integrity and ethical behavior. The Company supports and abides follows Extractive Industries Transparency Initiative (EITI).

当上述评判标准任何一条客观存在时，则该供应链被判定为高风

险供应链。部门合规专员应立即准备材料上报合规风控专员，由合规风控专员上报合规总监，由合规总监批准采取应对措施，停止交易，消除风险。

When any of the above judgment criteria exists objectively, the supply chain is judged as a high-risk supply chain. The Department Compliance Officer shall immediately prepare materials and report them to the Compliance Risk Control Officer who shall report them to the Compliance Director for approval. Then, the Compliance Director shall take countermeasures, stop trading and eliminate risks.

公司建立了《尽职调查检查表》和《风险评估表》，并收集了供应链的相关信息，根据上述风险评估标准对每条供应链进行了风险评估，未识别出上诉的高风险。

The Company established the *Due Diligence Checklist* and the *Risk Assessment Form*, and collected relevant information of supply chains. The Company assessed risks of each supply chain according to the above risk assessment standards and no high risk of appeal was identified.

3.向高级管理层报告风险评估

3. Report risk assessment to the senior management

公司建立风险评估报告制度，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。2022 年度评估所有铂钯供应商和供应链均为低风险，并该风险评估的结果已经汇报给合规总监。

The Company establishes the risk assessment report system. When the

supply chain investigation indicates that it comes from a high-risk area and is assessed as a high-risk supply chain, the transaction shall be stopped and reported to the Compliance Director. In 2022, all platinum and palladium suppliers and supply chains were assessed as low risk, and the risk assessment results have been reported to the Compliance Director.

第三步 设计并实施策略来应对已识别的风险

Step 3: Design and implement a management strategy to respond to identified risks

合规声明与要求:

Compliance Statement with Requirement:

我们公司已经充分遵守第 3 步:设计和落实管理体系应对识别的所有风险。

We have fully complied with Step 3: Design and implement a management system to respond to identified risks.

公司严格遵守 LPPM 铂钯责任指南第三步“设计并实施策略来应对已识别的风险”的要求。2022 年未发现高风险供应链，不需要做风险缓解。

The Company strictly abided by the requirements of “designing and implementing a management strategy to respond to identified risks” in Step 3 of LPPM Responsible Platinum and Palladium Guidance. No high-risk supply chains were found in 2022, so risk mitigation is not required.

公司制订了《供应链风险减缓管理办法》制定了风险缓解策略，包括（i）在继续交易的同时减轻风险；（ii）在暂停交易的同时减轻风险；或（iii）终止交易，并作为文控管理，约定了在供应商评估及日常业务开展过程中发现的违规情况的处理方式；规范了发现供应商存在高风险行为的处理步骤；明确了尽职管理各级组织、人员的责任，向高级管理人员实施进度跟进。

The Company has formulated the *Management Measures for Supply Chain Risk Mitigation* and put forward the risk mitigation strategies, including (i) reducing risks while continuing transactions; (ii) mitigating risks while suspending transactions; or (iii) terminating the transaction as document control, which stipulates the treatment methods for violations found in the supplier assessment and daily business development. Besides, the processing steps of high-risk behaviors of suppliers are regulated and the responsibilities of organizations and personnel at all levels for due diligence management are clarified for the implementation of progress follow-up by senior managers.

疑似高风险来料后，对其进行单独登记，并告知精炼车间，对其原料单独熔炼，在整个工艺流程中不与其他客户混合，对由其原料生产的成品金银进行单独编号，并在铂钯库中与其他成品铂钯分区域存放。

After the suspected high-risk incoming materials are found, they shall be registered separately and notified to the refining workshop. The corresponding raw materials shall be melted separately and shall not be mixed with the raw materials from other customers in the whole process

flow. The finished gold and silver produced by such raw materials shall be numbered separately and stored separately with other finished platinum and palladium in the platinum and palladium warehouse.

当供应链调查发现来自高风险区域时，要做加强型尽职调查，包括实地评估，评估政策中的风险。当供应链尽职调查发现可能来自高风险区域，则需立即暂停该矿产铂钯、再生铂钯的冶炼，直至供应商在 6 个月之内提供可证明其并不可能存在的额外数据或信息为止。若在 6 个月之内仍未提供相关证据，则需立即停止该交易并上报至有关人员。

When the supply chain investigation indicates that it comes from a high-risk area, it is necessary to conduct enhanced due diligence, including on-site assessment of the risks in the policy. When the due diligence of the supply chain indicates that it may come from high-risk areas, it is necessary to immediately suspend the smelting of the mineral resources of platinum and palladium and renewable platinum and palladium until the supplier provides additional data or information that can prove its impossible existence within 6 months. If relevant evidence is not provided within 6 months, the transaction shall be stopped immediately and reported to relevant personnel.

提供的资料包括：

The information provided includes:

(1) 提供证明不存在有关矿产铂钯、再生铂钯提取、运输或贸易的系统性或广泛人权侵犯行为的政府性文件，如供应商所在地相关公安或商务部门出具的合法性证明等；

(1) Provide government documents proving that there are no systematic or widespread human rights violations related to the extraction, transportation or trade of the mineral resources of platinum and palladium and renewable platinum and palladium, such as the legitimacy certificate issued by the relevant public security organs or commercial organs in the place where the supplier is located;

(2) 提供并未向非法武装组织提供直接或间接支持的证明文件；

(2) Provide documentary evidence that no direct or indirect support has been provided to illegal armed groups;

(3) 提供并未通过欺诈掩盖矿产铂钯或再生铂钯的原产地证明文件，如相关政府部门出具的原产地证明；

(3) Provide certificates of origin that do not cover the mineral resources of platinum and palladium and renewable platinum and palladium through fraud, such as certificates of origin issued by relevant government sectors;

(4) 提供不存在洗钱或恐怖主义融资的证明文件；

(4) Provide documentary evidence that there is no money laundering or terrorist financing;

(5) 提供国内小型矿山资质证明文件；

(5) Provide qualification certificates of domestic small mines;

(6) 提供环境和可持续发展相关方针政策、制度文件以及通过有关部门环评报告；

(6) Provide the guidelines, policies and system documents related to environment and sustainable development and the obtained

environmental impact assessment report of relevant organizations;

第四步 对精炼商的尽职调查实践开展独立的第三方审计。

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

合规声明与要求:

Compliance Statement with Requirement:

我们公司已经充分遵守第 4 步：安排独立第三方财务审计。

We have fully complied with Step 4: Arrange for an independent third-party financial audit.

公司严格遵守 LPPM 铂钯责任指南第四步“对精炼商的尽职调查实践开展独立的第三方审计”的要求，于 2023 年聘请 RCS 对公司 2022 年度供应链尽职体系进行审计。

The Company strictly abided by the requirements of “arranging for an independent third-party audit of the refiner due diligence” in Step 4 of LPPM Responsible Platinum and Palladium Guidance and hired RCS Global to audit the Company’s 2022 supply chain due diligence system in January 2023.

自 2015 年开始，公司每年均聘请独立的第三方审计机构对财务进行审计，并出具审计报告。

Since 2015, the Company has hired an independent third-party audit institution to audit its financial affairs and issue audit reports every year.

第五步 供应链尽职调查年度报告

Step 5: Annual report on supply chain due diligence

合规声明与要求:

Compliance Statement with Requirement:

我们公司已经充分遵守第 5 步：有关供应链尽职调查的报告。

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

公司严格遵守 LPPM 铂钯责任指南第五步“供应链尽职调查年度报告”的要求。

The Company strictly abided by the requirements of “annual report on supply chain due diligence” in Step 5 of LPPM Responsible Platinum and Palladium Guidance.

公司每年通过深圳市点金贵金属精炼有限公司供应链尽职调查政策进行公示。

The Company will publicize the supply chain due diligence policy of Shenzhen Point Gold Refining Co., Ltd. every year.

根据 2022 年的尽职调查结果，无供应商需要进行风险缓解的管理策略。在 2022 年年终无铂钯评估结果为“暂停合作”或“终止合作”的供应商。供应链尽职管理合规报告将在公司官方网站进行公示。

According to the due diligence results in 2022, no supplier was required to carry out the risk mitigation management strategy. At the end of 2022, there were no suppliers whose assessment results of platinum and palladium were “suspension of cooperation” or “termination of cooperation”. The Due Diligence Management Compliance Report of Supply Chain will be publicized on the Company’s official website.

四、管理结论

IV. Management conclusion

综上所述，在报告年度截至 2022 年 12 月 31 日的财年内，根据《伦敦铂钯市场协会（LPPM）可靠铂钯指导原则》的要求，深圳市点金贵金属精炼有限公司实施了有效的管理制度、程序、流程和实践。深圳市点金贵金属精炼有限公司致力于不断的改进提升，所有的纠正措施将在内部进行定期监测。纠正性行动计划单独传达给 LPPM 执行机构，以及《伦敦铂钯市场协会（LPPM）可靠铂钯指导原则》的管理人员。

In conclusion, in the financial year ending December 31, 2022, Shenzhen Point Gold Refining Co., Ltd. implemented effective management systems, procedures, processes and practices in accordance with the requirements of the *London Platinum and Palladium Market (LPPM) Responsible Platinum and Palladium Guidance*. Shenzhen Point Gold Refining Co., Ltd. is committed to continuous improvement and all corrective measures will be regularly monitored internally. The corrective action plan is communicated separately to implementing agencies of LPPM and the management personnel of the *London Platinum and Palladium Market (LPPM) Responsible Platinum and Palladium Guidance*.

五、其他报告批注

V. Other report comments

如果本报告用户希望就本报告向深圳市点金贵金属精炼有限公司进行任何反馈，则可以通过邮箱 13066888690@163.com 联系企业相关部门。

If users of this report wish to provide any feedback to Shenzhen Point Gold Refining Co., Ltd. with respect to this report, please contact relevant department of the Enterprise by E-mail 13066888690@163.com.