

金隆铜业有限公司  
白银供应链尽职调查合规报告  
(2025 年)

Jinlong Copper Co., Ltd.

Due Diligence Compliance Report on Silver Supply Chain

(2025)

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<b>公司名称</b>	金隆铜业有限公司
<b>位置</b>	安徽省铜陵市铜官区金山西路 1 号
<b>年终报告</b>	2025 年度白银供应链尽职调查合规报告
<b>报告日期</b>	2026 年 3 月
<b>Company name</b>	Jinlong Copper Co., Ltd.
<b>Location</b>	No.1 Jinshan West Road, Tongguan District, Tongling City, Anhui Province
<b>Year end report</b>	December 31, 2025
<b>Report date</b>	March, 2026

## 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.

公司经营管理实行党委会/董事会领导下的总经理负责制，公司重大决策由党委会/董事会决定，由总经理执行并对董事会负责。公司设行政事务部、计财部、商务部、安全环境基础部、技术创新部和金隆工场。部门下根据需要设置课、室等；公司建立总经理办公会、经营例会、专业会议制度，以便对生产经营活动中的重要事项、日常工作、专业性工作进行讨论和决策。

The company implements a General Manager responsibility system under the leadership of the Party Committee / Board of Directors. Major decisions of the company are made by the Party Committee / Board of Directors, and the General Manager is responsible for executing those decisions and reporting to the Board of Directors. The company has established the following departments: Administrative Affairs Department, Planning and Finance Department, Commerce Department, Safety, Environment and Infrastructure Department, Technology Innovation Department, and Jinlong Workshop. Sections and offices are set up under the departments as needed. The company has also established a General Manager Office Meeting, regular operating meetings, and specialized meetings to discuss and make decisions on important matters, routine work, and specialized tasks in production and operation activities.

公司是一座面向国际的买矿型冶炼厂，原料铜精矿主要从国外进口，产品面向国内、外市场。主工艺采用国际先进水平的铜闪速熔炼工艺、卡尔多炉冶炼工艺和硫酸净化动力波系统。主要工艺流程为：铜精矿经闪速熔炼生成冰铜，送入 P-S 转炉吹炼，阳极炉精炼后浇铸为铜阳极板，送至电解精炼后生产主产品阴极铜；电解精炼产出的铜阳极泥入卡尔多炉，经熔炼氧化排渣，进一步富集后浇铸为富银的多尔合金板，再送至银电解系统产出银粉，最终熔铸为银锭。

The company is an internationally oriented ore-purchasing smelter; the raw material copper concentrate is mainly imported from abroad, and the products are sold to both domestic and international markets. The main processes adopt internationally

advanced copper flash smelting technology, Kaldo furnace smelting technology, and the DynaWave system for sulfuric acid purification. The main process flow is as follows: copper concentrate is smelted in a flash furnace to produce matte, which is then sent to P-S converters for converting; after refining in an anode furnace, it is cast into copper anode plates, which are then sent to electrolytic refining to produce the main product, cathode copper; the copper anode slime produced from electrolytic refining is fed into a Kaldo furnace, where it is smelted, oxidized, and slagged; after further enrichment, it is cast into silver-rich Dore alloy plates, which are then sent to the silver electrolysis system to produce silver powder, and finally melted and cast into silver ingots.

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 AAAAA 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 2025 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, 2025.

## 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 2025 年 12 月 31 日止，公司已遵守第 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, 2025, the company has 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，公司制定了《矿产供应链尽责管理政策》，适用的物料范围为铜、银。我们会及时将政策文件传达至公司内各相关人员，以确保日常工作中的尽责管理得到有效落实；同时在政策中我们也要求与我们合作的上游业务伙伴将政策要求纳入所签订的合同和协议中，并且我们接受外部监督，将政策文件在公司官网公开披露（<http://www.jinlongcopper.com/information/infoshow.aspx?cid=854&classid=467>）。

### 1. Responsible Silver Due Diligence Policy

In accordance with the requirements of Annex II of the *LBMA Responsible Silver Guidance (Second Edition)* and the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)* (hereinafter referred to as the "OECD Due Diligence Guidance"), approved by the Company's Mineral Supply Chain Compliance Management Committee, the Company has formulated the *Mineral Supply Chain Responsible Management Policy*, applicable to the scope of copper and silver. We will promptly communicate the policy document to all relevant personnel within the Company to ensure effective implementation of responsible management in daily operations; at the same time, in the policy we also require our upstream business partners to incorporate the policy

requirements into the signed contracts and agreements, and we accept external supervision, disclosing the policy document publicly on the Company's official website (<http://www.jinlongcopper.com/information/infoshow.aspx?cid=854&classid=467>).

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、社会和治理 ESG 因素在公司供应链中的风险。公司及时对《矿产供应链尽责管理政策》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。

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 "*Mineral Supply Chain Responsible Management 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.

针对白银供应链的尽职调查管理，公司制定了《白银供应链尽职调查管理办法》，其内容包括适用范围、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。

To manage the due diligence of the silver supply chain, the company has developed the "*Silver Supply Chain Due Diligence Management Measures*." The content includes the scope of application, organizational structure and responsibilities, collection of supplier and customer information, supply chain risk identification and assessment, monitoring of supply chain transactions, management of record archives, training and communication, etc. 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.

2025年3月21日，公司召开了关于矿产供应链合规管理工作会议，其中针对白银供应链尽职调查管理相关政策文件内容进行了审议与批准，要求合规管理办公室做好政策宣贯，并将《矿产供应链尽责管理政策》、《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》等相关政策文件，通过公告与OA邮件形式将其传达给所有相关员工。

On March 21, 2025, the company held a meeting on mineral supply chain compliance management, during which the content of relevant policy documents on silver supply chain due diligence management was reviewed and approved. The compliance management office was required to effectively disseminate the policies, and the relevant policy documents, including the *Mineral Supply Chain Compliance Management Policy*, the *Measures for the Management of Silver Supply Chain Due Diligence*, and the *Risk Mitigation Strategy for Silver Supply Chain Due Diligence*,

were to be communicated to all relevant employees via 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，成立了以总经理为委员会主席，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。2026年1月9日，公司开展了白银供应链尽职调查内部评审，主要对公司及各部门活动及管理是否符合供应链尽职调查体系文件和标准的要求进行了评估。评审结果显示，公司尽职调查体系运行正常。

## 1.2 Internal Management Organization for Due Diligence

With the approval and authorization of the Board of Directors, a Compliance Management Committee was established, chaired by the General Manager. The committee includes department heads from the Finance, Business, and Safety, Environment and Infrastructure Department, among others, as members. The main responsibility of the committee is to oversee the normal operation of the company's due diligence system, assess the effectiveness of the supply chain due diligence policies and processes annually, and drive continuous improvement. On January 9, 2026, the company conducted an internal review of the silver supply chain due diligence, primarily evaluating whether the activities and management within the company and its departments comply with the requirements of the supply chain due diligence system documentation and standards. The review results indicate that the company's due diligence system is operating normally.

委员会主席作为公司董事会成员之一，具备深厚的行业积淀，拥有超过 20 年的冶金领域资深从业背景。作为公司矿产供应链尽职调查工作的最高决策者，其主持供应链合规管理工作已逾 5 年，在统筹管理体系建设、重大风险研判及

战略合规决策方面具有丰富经验。其连续两年深度参与行业协会举办的尽责管理能力培训，不仅精通 OECD 尽职调查五步法框架，也熟知国际社会高度关注的 ESG 管理要求，更致力于将合规准则深度植入公司业务流与日常运营中。其凭借卓越的风险洞察力，主导高风险供应链的最终评审，并督导风险缓解策略的高效执行。

The Chairman of the Committee, as a member of the company's Board of Directors, has a strong industry background with over 20 years of senior experience in the metallurgy field. As the highest decision-maker in the company's mineral supply chain due diligence efforts, he has led the supply chain compliance management work for more than five years. He possesses extensive experience in managing system construction, assessing major risks, and making strategic compliance decisions. Having participated in industry association-led due diligence management capability training for two consecutive years, he is not only proficient in the OECD five-step due diligence framework but also well-versed in ESG management requirements, which are of high concern internationally. He is committed to embedding compliance standards deeply into the company's business processes and daily operations. With his exceptional risk insight, he leads the final review of high-risk supply chains and oversees the efficient implementation of risk mitigation strategies.

### 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。

### 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.

其中安全环境基础部部长担任合规管理办公室主任（合规官），合规官拥有有色金属冶炼行业超过 30 年从业经验，其中 3 年负责公司矿产供应链合规管理及供应商审核，参加过行业协会组织的矿产供应链尽责管理专项培训，精通《OECD 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》五步法框架的合规管理体系，熟练掌握供应链风险识别能力、对高风险供应链强化尽职调查的工作开展以及风险缓解策略的制定与执行。并且在各部门和课室配置了业务相关的合规专员，从事各课室尽职调查管理日常工作。

Among them, the head of the Safety, Environment and Infrastructure Department serves as the director of the Compliance Management Office (Compliance Officer). Compliance officer has over 30 years of experience in the non-ferrous metal smelting industry, including three years responsible for the company's mineral supply chain compliance management and supplier audits, has participated in specialized training on mineral supply chain responsible management organized by industry associations, is proficient in the compliance management system of the five-step framework of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, and possesses a solid capability in supply chain risk identification, the ability to conduct enhanced due diligence on high-risk

supply chains, and the formulation and implementation of risk mitigation strategies. In addition, business-specific compliance specialists have been assigned to each department and section/office to handle the routine work of due diligence management in their respective sections/offices..

合规专员负责对供应商进行供应链信息的更新收集与识别评估，并将日常管理结果反馈至合规管理办公室，由合规官审阅批复。若遇需公司层面决议批准的重大事项（如公司供应链涉及受冲突影响的高风险地区，触发强化尽职调查，需开展实地评估的问题），则由合规专员进行方案调研与整理，并上报合规官；合规官将相关事项提交至合规管理委员会，组织召开会议，在会上向公司申请必要的资源支持，其中 2025 年 3 月 21 日的会议，合规管理办公室针对委托第三方开展实地评估的项目以及邀请资质单位对公司供应商进行供应链合规管理培训项目方案进行了汇报，并在会上通过了批准，以最大限度满足供应链尽职调查的合规要求。

The compliance specialists are responsible for updating, collecting, identifying and evaluating supply chain information from suppliers, and reporting the routine management results to the Compliance Management Office, where they are reviewed and approved by the Compliance Officer. If any major matter requiring resolution and approval at the company level arises (such as the company's supply chain involving conflict-affected high-risk areas, triggering enhanced due diligence and requiring on-site assessment), the compliance specialist will conduct research and organize the relevant plan, and report it to the Compliance Officer; the Compliance Officer will submit the matter to the Compliance Management Committee, convene a meeting, and request necessary resource support from the company at the meeting. For example, at the meeting held on March 21, 2025, the Compliance Management Office reported on the project of commissioning a third party to carry out on-site assessments and the project of inviting qualified entities to provide supply chain compliance management training for the company's suppliers, and the meeting approved these projects to meet

the compliance requirements of supply chain due diligence to the greatest extent possible.

### 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。2025 年 9 月 12 日，公司外聘咨询公司老师进行线上授课，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线上培训，培训内容包括《经合组织尽职调查指南》、《矿产供应链尽责管理政策》、同行企业的 ESG 管理实践等内容，确保公司各课室相关业务人员以及合规委员会、办公室成员熟悉供应链尽职调查程序的工作要求。

### 1.2.2 Training

The company includes the LBMA Responsible Silver Guidance and the supply chain due diligence management process training into its annual training plan each year. On September 12, 2025, the company engaged an external consulting firm to conduct online training, organizing online training for members of the company's supply chain compliance committee, the compliance office, and suppliers, with training content including *the OECD Due Diligence Guidance, Mineral Supply Chain Responsible Management Policy*, and ESG management practices of peer companies, ensuring that relevant business personnel in each department and section/office, as well as members of the compliance committee and compliance office, are familiar with the working requirements of the supply chain due diligence procedures.

2025 年 12 月 23 日，合规管理办公室组织开展了“负责任供应链尽职调查”专项能力培训。本次培训采取精准覆盖原则，针对供应链关键岗位人员（共计 11 名）进行深度赋能，包括安基部质计课（2 人）、商务部原料课（5 人）、计财部财务课（2 人）及行政事务部（2 人）。核心课程涵盖了《LBMA 负责任白银指南》（V2）、公司《矿产供应链尽责管理政策》、受冲突影响和高风险区域（CAHRA）识别程序等关键合规标准。为验证培训有效性，现场设置了专项

问答与随机抽检环节。考评结果显示，参训人员对尽职调查流程及风险预警触发机制的掌握合格率达 100%，有效确保了公司合规管理制度在执行层面的准确落地。

On December 23, 2025, the Compliance Management Office organized a specialized capability training on "Responsible Supply Chain Due Diligence". This training adopted the principle of precise coverage, providing in-depth empowerment to key supply chain personnel (11 persons in total), including the Quality Measurement Section of the Safety, Environment and Infrastructure Department (2 persons), the Raw Materials Section of the Commerce Department (5 persons), the Finance Section of the Planning and Finance Department (2 persons), and the Administrative Affairs Department (2 persons). The core curriculum covered key compliance standards such as the LBMA Responsible Silver Guidance (V2), the company's *Supply Chain Responsible Management Policy*, and the procedure for identifying Conflict-Affected and High-Risk Areas (CAHRA). To verify the effectiveness of the training, special Q&A sessions and random spot checks were conducted on site. The assessment results showed that 100% of the participants had mastered the due diligence process and the risk alert triggering mechanism, effectively ensuring the accurate implementation of the company's compliance management system at the execution level.

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。2025 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 2025, 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 内部管理评审

根据公司《内部评估工作计划》要求，为提升供应链合规管理能力、监督合规管理绩效、确保体系适宜性与有效性，内部管理评审周期为一年一次。评估实施过程包括召开首次会议、通过访谈、查阅文件、现场走访、随机抽样等方式收集客观证据，并做好内审记录。2026年1月9日，合规管理办公室组织供应链合规管理关键业务人员组成评估小组，正式开展白银供应链尽职调查内部评审，重点评估公司及各部门活动与管理是否符合供应链尽职调查体系文件及 LBMA RSG 2.0 等标准要求，评审覆盖 2025 年 1 月 1 日至 12 月 31 日的运行情况，审查了尽职调查五步骤及相关文件，最终形成内部评估报告。

### 1.2.3 Internal Management Review

In accordance with the requirements of the company's *Internal Evaluation Work Plan*, in order to enhance supply chain compliance management capabilities, supervise compliance management performance, and ensure the suitability and effectiveness of the system, the internal management review cycle is once a year. The evaluation implementation process includes holding an opening meeting, collecting objective evidence through interviews, document reviews, on-site visits, random sampling, etc., and maintaining internal audit records. On January 9, 2026, the Compliance Management Office organized key business personnel in supply chain compliance management to form an evaluation team and officially conducted an internal review of the silver supply chain due diligence, focusing on assessing whether the activities and management of the company and its various departments comply with the requirements of the supply chain due diligence system documents and LBMA RSG 2.0 and other standards. The review covered the operational period from January 1 to December 31, 2025, examined the five steps of due diligence and related documents, and finally produced an internal evaluation report.

报告结果显示：步骤一（建立体系）、步骤三至五以及 OECD 各项风险管控均符合要求；步骤二中“开展供应链尽职调查，识别供应链风险”被评定为“需改进”，主要原因是仍有部分供应商未反馈 KYC 及 ESG 评估材料，且发现部分供应链矿源地涉及制裁名单。针对上述问题，明确由合规管理办公室负责改进。公司已对高风险供应链（如来自刚果金的原料）委托第三方开展实地评估，并建立申诉机制、风险缓解策略及第三方鉴证合作。总体而言，公司尽职调查体系运行正常，除需完善供应商信息收集外，其余各项管理均满足标准要求。内部评估报告已归档保存，并将作为后续持续改进和年度合规报告的重要依据。

The report results show that Step One (establishing the system), Steps Three to Five, and all OECD risk control measures meet the requirements; "Conducting supply chain due diligence and identifying supply chain risks" in Step Two was rated as "needs improvement", mainly because some suppliers still have not provided KYC and ESG assessment materials, and it was found that some supply chain mining areas involve sanctions lists. In response to the above issues, the Compliance Management Office was clearly designated as responsible for improvement. The company has commissioned third parties to conduct on-site assessments for high-risk supply chains (such as raw materials from the Democratic Republic of the Congo), and has established a grievance mechanism, risk mitigation strategies, and third-party assurance cooperation. Overall, the company's due diligence system is operating normally; apart from the need to improve supplier information collection, all other management aspects meet the standard requirements. The internal assessment report has been filed and preserved, and will serve as an important basis for subsequent continuous improvement and the annual compliance report.

#### **1.2.4 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。2025 年度公司交易支付操作均按上述支付方

式执行。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，按照每年度进行收纳整理，并且保存 5 年以上，方便随时调取。

#### 1.2.4 Payment Policies and Record Retention

When making payments for goods, the company initiates a joint signature procedure for fund matters through the business department. After approval, online payment is made through the company's bank account, with domestic payments made via bank transfer and international payments made via letter of credit. Bank slips are printed and retained as supporting attachments. In 2025, all transaction payment operations of the company were carried out in accordance with the above payment methods. In addition, the company retains copies of suppliers' business licenses and other qualification verification materials, as well as supplier due diligence forms, weighbridge tickets for each batch, original records of moisture determination, original testing records, test reports, settlement statements, payment vouchers, and other relevant records. These documents are organized on an annual basis and retained for more than five years, making them easy to access at any time.

### 1.3 建立内部供应链追溯体系

本公司作为铜冶炼企业，白银生产系统所使用的原料完全源自铜冶炼过程中产出的铜阳极泥。本公司生产白银的唯一直接投入物为铜阳极泥。该物料是公司在电解铜生产过程中，通过对采购的国内外铜精矿及粗铜进行熔炼、精炼后，在电解槽底部积聚而成的富含贵金属的副产物。根据 LBMA 《负责任白银指南》的定义，铜阳极泥被识别为“银的采矿副产品”。基于指南中关于可追溯性的要求，由于白银是在中国境内的冶炼过程中首次从铜载体中分离并富集于阳极泥内，故中国被识别为这些采矿副产品的原产国，而本公司的冶炼现场即为白银的

物理分离点。

### **1.3 Establishment of an Internal Supply Chain Traceability System**

As a copper smelting company, the raw materials used in the silver production system are entirely derived from copper anode slime produced during the copper smelting process. The only direct input material for the company's silver production is copper anode slime. This material is a byproduct rich in precious metals, formed at the bottom of the electrolytic cell during the copper electrolysis process, after melting and refining the domestically and internationally sourced copper concentrates and crude copper. According to the LBMA "*Responsible Silver Guidance*" definition, copper anode slime is identified as a "mining byproduct of silver." Based on the traceability requirements outlined in the guidance, since silver is first separated from copper-bearing materials and concentrated in the anode slime during the smelting process in China, China is identified as the country of origin for these mining byproducts, and the company's smelting site is the physical separation point for silver.

尽管中国作为这些采矿副产品的原产国和追溯重点，但是基于风险考虑公司依然追溯并识别了产生这些阳极泥的原料也就是铜精矿、粗铜的上游供应链信息。针对 2025 年度采购的含银原料（包括作为采矿副产品来源的铜物料以及含有微量白银的回收料），公司均严格执行准入审查。我们保证在与供应商合作之前都会对所有的供应商进行资信调查，在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，要求对方承诺原料来源合法合规，符合 LBMA 尽职调查政策。

Although China is the country of origin and the focus of traceability for these mining byproducts, the company, based on risk considerations, has still traced and identified the upstream supply chain information for the raw materials that generate these anode slimes, specifically copper concentrates and crude copper. For the silver-containing raw materials purchased in 2025 (including copper materials as mining byproducts and recycled materials containing trace amounts of silver), the

company strictly implements an entry review process. We ensure that before collaborating with suppliers, all suppliers undergo a credit investigation. Upon successful completion of the investigation, contracts are signed along with supplier social commitment letters and supplier codes of conduct. Suppliers are required to commit that the raw materials' sources are legal and compliant, and that they adhere to the LBMA due diligence policies.

公司建立了一套可追溯系统，商务采购部门通过 KYC 调查表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，进而分别通过原产地、供应商资信、材料类型信息，来识别供应链的位置风险、供应商风险以及材料类型风险，确保按照《LBMA 白银指南》的要求来进行含银原料的风险识别与评估。

The company has established a traceability system. The commercial procurement department collects information on the origin of raw materials, material type, arrival date and final determination date, as well as relevant documents such as contracts, bills of lading, and customs documents from suppliers through KYC questionnaires. Then, based on the origin, supplier creditworthiness, and material type information, it identifies the location risk, supplier risk, and material type risk in the supply chain, ensuring that the risk identification and assessment of silver-bearing raw materials are carried out in accordance with the requirements of the *LBMA Silver Guidance*.

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。2025 年所有采购的原料交易数据均正常无疑。

The quality inspection department conducts acceptance inspection on each batch of raw materials supplied by suppliers. The acceptance inspection items include weight, moisture content, grade, etc. For weight acceptance, there is a weighbridge ticket; for moisture content acceptance, there are original records of moisture determination; for grade acceptance, there is a test report. The weighbridge ticket and the original records of moisture determination are signed and confirmed by the acceptance inspector and the supplier, and are ultimately issued to the supplier in the form of a quality inspection report. Samples are taken and tested during the production process, and finally silver products are produced, each printed with a unique number, and traded through the Shanghai Gold Exchange or silver customers. In our daily work, we check and verify the consistency of information such as raw material type, weight, grade, transportation route, shipping batch, and related information including purchase orders and invoices for each raw material transaction, ensuring that the risk status of each transaction is within a controllable monitoring range. All raw material transaction data purchased in 2025 were normal without any issues.

#### **1.4 加强与白银交易对手方的联系**

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》与原料供应商进行并维持联系。通过邮件、微信、电话等方式进行日常业务沟通，使其及时了解 LBMA 负责的白银供应链政策，以及公司制定白银供应链尽职调查的政策，我们鼓励供应商遵循上述政策及程序，或者满足《OECD 指南》附件二政策内容的供应商自身的政策，并将政策要求纳入商务合同/协议中。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 company's Raw Materials Section of the Commerce Department is responsible for establishing and maintaining contact with raw material suppliers in

accordance with the *Measures for the Management of Silver Supply Chain Due Diligence*. Daily business communication is conducted via email, WeChat, telephone, etc., to keep them informed of the LBMA Responsible Silver Supply Chain Policy and the company's silver supply chain due diligence policy. We encourage suppliers to follow the above policies and procedures, or their own policies that meet the content of Annex II of the *OECD Guidance*, and to incorporate the policy requirements into business contracts/agreements. Through full communication, we conduct risk assessments on suppliers and avoid cooperating 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，2025年9月12日，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，线上共参培人数62人。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。

Furthermore, we actively encourage suppliers to widely participate in supply chain compliance management work to enhance the overall management level. Therefore, in order to improve the effectiveness of supply chain compliance management, on September 12, 2025, we commissioned a qualified third-party institution, invited experts in the field of supply chain compliance management, and convened the compliance officers of relevant suppliers in the supply chain to conduct an online special training on supply chain compliance management, with a total of 62 participants online. This initiative aims to clearly convey to all suppliers our determination to advance supply chain compliance management, and also demonstrates our practical actions to improve the compliance management level of all links in 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。2025 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《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 cooperating with suppliers, the Raw Materials Section will require all silver raw material suppliers to sign a compliance declaration or clearly stipulate compliance clauses in the contract terms, ensuring that suppliers understand and comply with the *LBMA Responsible Silver Guidance*, as well as the company's silver supply chain policies and requirements, to reduce cooperation risks. In 2025, all 42 raw material suppliers of the company signed a letter of commitment, promising to comply with the *LBMA Responsible Silver Guidance* and our company's silver supply chain due diligence policies and requirements.

因公司作为铜冶炼企业，不直接采购银矿，故我们对 2025 年度采购的铜精矿来源国进行追溯，其中 EITI 的执行国别分别为：刚果金、秘鲁、墨西哥（暂停）、印度尼西亚、菲律宾、赞比亚、智利。进一步核查后，并未发现有来自 EITI 执行国运营的国有企业处购买铜精矿。

As the company is a copper smelting enterprise and does not directly purchase silver ores, we trace the countries of origin for the copper concentrates purchased in 2025. The EITI implementing countries are as follows: Democratic Republic of the Congo, Peru, Mexico (suspended), Indonesia, Philippines, Zambia, and Chile. After further investigation, no purchases of copper concentrates were found to have been made from state-owned enterprises 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

行为的可以通过电话+86-0562-3868888、电子邮箱 [jcc@jinlongcopper.com](mailto:jcc@jinlongcopper.com) 等方式进行反馈。公司供应链合规政策、电话、电子邮箱均在公司官网发布，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=853&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](mailto: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=853&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。对于申诉情况涉及尽职调查管理工作优化的，我们将同步在政策文件中进行修订，并及时传达至所有相关员工，落实最新的政策要求。公司截止 2025 年 12 月 31 日，公司并未收到员工及相关供应商的任何申诉。

When we receive a complaint, we will follow the complaint management procedure and promptly notify the Compliance Management Office, providing feedback within 7 working days on whether the complaint is accepted and, if accepted, the initial measures to be taken. Once the complaint is accepted, an investigation process will be initiated to identify the root cause of the issue through external investigation, assessment, supplier inquiries, internal procedure reviews, etc. After discussion at the Compliance Management Office and approval by the Committee upon reporting, a resolution will be provided to the complainant through the original channel within 60 working days from the acceptance of the complaint, facilitating the reaching of a written consensus and implementing the measures related to the resolution. If communication between the parties fails to achieve a satisfactory result, third parties such as industry associations, field experts, or consulting agencies will be sought to find a solution. If the complaint involves optimization of due diligence management, we will simultaneously revise the policy documents, promptly communicate the updates to all relevant employees, and implement the latest policy requirements. As of December 31, 2025, the company has not received any complaints from employees or relevant 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 2025 年 12 月 31 日，公司完全遵守第 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, 2025, the company has fully 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，合规管理办公室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。为了确保风险评估团队的经验足够丰富，我们要求办公室的合规专员，每年有两位参加行业组织的关于矿产供应链合规管理的内审员培训，且公司内部每年也组织两次培训，保证公司各责任部门的合规专员全勤参加。

Before conducting cooperation, the Compliance Management Office needs to conduct a risk assessment of suppliers. The company's silver supply chain risk assessment is based on three aspects: location risk, supplier risk, and material type risk. To ensure that the risk assessment team has sufficient experience, we require that each year, two compliance specialists from the office participate in internal auditor training on mineral supply chain compliance management organized by industry associations, and the company also organizes two internal training sessions each year to ensure full attendance by compliance specialists from all responsible departments.

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/转运中心和高风险洗钱国家/地区的可靠市场情报、世界遗产地列表等资料。2025 年度，我们识别到了刚果金、墨西哥作为铜精矿的原产国被公司的 CAHRAs 识别程序判定为涉及受冲突影响的高风险地区，为此我们通过联系上游供应商、国内同行企业以及行业协会，努力推进强化尽职调查程序开展，其中对于刚果金的供应商已经取得联系并委托资质单位 2025 年 9 月份参与实地评估工作，而部分无法取得联系的高风险供应商，我们也会采取桌面调研的替代方案来尽可能满足强化尽职调查的要求。

For location-based risks, we refer to sanction lists (United States, United

Kingdom, European Union, United Nations, and related sanctions), the EU CAHRA list, the Heidelberg Conflict Barometer, the Fragile States Index or similar indices, reports from the UN High Commissioner for Human Rights or equivalent institutions, Financial Action Task Force (FATF) reports (including country/region-specific reports), reliable market intelligence on high-risk silver hubs/transit points, high money-laundering risk countries/regions, World Heritage lists, and other relevant resources. In 2025, we identified the Democratic Republic of the Congo and Mexico as countries of origin for copper concentrates, which were determined by the company's CAHRAs identification process as high-risk areas affected by conflict. In response, we have been actively working to strengthen due diligence procedures by contacting upstream suppliers, domestic peer companies, and industry associations. For suppliers in the Democratic Republic of the Congo, we have already made contact and commissioned a qualified organization to participate in on-site assessments in September 2025. For some high-risk suppliers that we were unable to contact, we will use desk-based research as an alternative to meet the enhanced due diligence requirements as much as possible.

关于供应商风险与材料类型风险识别评估，原料课业务人员针对大型矿山（LSM）及回收银供应商，严格执行以 KYC 尽职调查表为核心的识别程序。在沟通阶段，业务人员须全面收集供应商提供的营业执照、财务报表、公司年报及 Copper Mark 认证等资质文件，并交叉比对官方公示系统（如国家企业信息公示平台）及公司官网披露的 ESG 或尽职调查报告。通过对 KYC 信息的完整性审查与准确性核实，确保供应链监管链（CoC）各环节信息的真实性，为后续风险评估奠定坚实的数据基础。

Regarding the identification and assessment of supplier risk and material type risk, business personnel in the Raw Materials Section strictly implement the identification procedure centered on the KYC due diligence questionnaire for large-scale mines (LSM) and recycled silver suppliers. During the communication

phase, business personnel must comprehensively collect qualification documents such as business licenses, financial statements, annual reports, and Copper Mark certifications provided by suppliers, and cross-check them against official public disclosure systems (such as the National Enterprise Credit Information Publicity System) and ESG or due diligence reports disclosed on the company's official website. Through completeness review and accuracy verification of KYC information, the authenticity of information at each stage of the supply chain chain of custody (CoC) is ensured, laying a solid data foundation for subsequent risk assessment.

依据公司供应链尽职调查管理制度，原料课对供应商进行深度的身份穿透与合规审查。评估范围涵盖供应商的基本情况、股东信息及最终实益所有人（UBO）身份识别，严禁与涉及洗钱、诈骗、恐怖主义等非法活动的对手方开展业务。同时，公司坚持将调查向供应链上游延伸，通过业务性质分析及利益相关方访谈，全方位评估潜在商业风险。对于任何触及“零容忍”底线的供应商，公司始终坚持一票否决，坚决拒绝合作。

In accordance with the company's supply chain due diligence management system, the Raw Materials Section conducts in-depth identity penetration and compliance reviews of suppliers. The assessment scope covers the supplier's basic information, shareholder information, and identification of the ultimate beneficial owner (UBO). Cooperation with counterparties involved in illegal activities such as money laundering, fraud, terrorism, etc. is strictly prohibited. At the same time, the company insists on extending the investigation upstream along the supply chain, conducting comprehensive assessments of potential commercial risks through business nature analysis and stakeholder interviews. For any supplier that touches the "zero tolerance" bottom line, the company always applies a one-vote veto and resolutely refuses to cooperate.

若供应商没有涉及上述类型的风险行为，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、桌面调研方式对尽职调查结果进一步核实，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。此外公司合规管理办公室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 is not involved in any of the above types of risk behaviors, it will be determined as a low-risk supplier; if any of the above risk events exists, the company will define the supplier as a high-risk supplier. For high-risk suppliers, the company's due diligence team will conduct a re-evaluation of the supplier. The re-evaluation procedures include on-site inspections and desktop research to further verify the due diligence results. Before the high-risk event is resolved, the company will not establish any cooperative relationship with the supplier. Only after confirming that no such high-risk events exist will the company proceed with normal cooperation with the supplier. In addition, the company's Compliance Management Office will ensure the annual update of KYC, due diligence documents, risk assessments, and other related work and information for existing suppliers, and actively maintain the most effective communication with suppliers to ensure the timeliness of the company's mineral supply chain compliance status.

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.

## 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地区/国家

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 个月曾从高风险地区/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 2025 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，也不存在供应商或交易对手方、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 2025 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 2025 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 2025, the company's supply chain did not involve any zero-tolerance risks.

2025 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 23 家，国内供应商 19 家。我们鼓励并支持我们的上游交易方积极推进自身的供应链合规管理，其中我们筛查到共有 17 家的供应商完成了其他如 LME 供应链审核、Coppermark 审核、ESG 审核等类似供应链体系合规审核并发布报告，对这些合作伙伴们的供应链管理做出的良好实践，我们表示充分认可。

In 2025, the company purchased raw materials from a total of 42 suppliers, including 23 imported suppliers and 19 domestic suppliers. We encourage and support our upstream trading partners to actively promote their own supply chain compliance management. Among them, we have identified that 17 suppliers have completed other similar supply chain compliance audits such as LME supply chain audits, Copper Mark audits, ESG audits, etc., and have issued reports. We fully recognize the good practices in supply chain management made by these partners.

2025 年度对进口国外原料来源国为：澳大利亚、博兹瓦纳、菲律宾、刚果金、加拿大、美国、秘鲁、墨西哥、塞尔维亚、沙特阿拉伯、西班牙、印度尼西亚、智利、韩国、南非、赞比亚，国内来源地为安徽省、广东省、浙江省、上海市、江苏省、内蒙古自治区。根据《金隆公司白银供应链尽职调查管理办法》对进口供应商进行风险识别，关于位置风险其中刚果金、墨西哥在海德堡晴雨表中存在 4 级有限战争的情况，故判定为位置风险-高风险。其余来源国经查询海德堡晴雨表中无 4 级及以上战争，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，脆弱国家指数低、联合国人权事务高级专员办事处或同等机构无 OHCHR 报告的相关指控、未查询到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。

For 2025, the countries of origin for imported foreign materials are: Australia, Botswana, Philippines, Democratic Republic of the Congo, Canada, United States, Peru, Mexico, Serbia, Saudi Arabia, Spain, Indonesia, Chile, South Korea, South Africa, and Zambia. Domestic sources are from Anhui Province, Guangdong Province, Zhejiang Province, Shanghai, Jiangsu Province, and Inner Mongolia Autonomous Region. Based on the "Jinlong Company Silver Supply Chain Due Diligence

Management Measures," risk identification is carried out for imported suppliers. Regarding location-based risks, the Democratic Republic of the Congo and Mexico are identified as high-risk areas due to the presence of level 4 limited conflict in the Heidelberg Conflict Barometer, and are thus classified as location risk - high risk. For the other countries of origin, no level 4 or higher conflicts were found in the Heidelberg Conflict Barometer. Additionally, there are no sanctions from China, the United States, the United Kingdom, the European Union, or the United Nations, they are not listed on the Financial Action Task Force (FATF) list, have low rankings on the Fragile States Index, and there are no related allegations in reports from the UN High Commissioner for Human Rights or equivalent institutions (OHCHR). No reliable market intelligence has been found regarding high-risk gold and silver hubs/transit points or high money-laundering risk countries/regions.

### **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。2025 年度期间公司白银供应链经审查来自刚果金、墨西哥的原料为高风险供应链，故触发强化尽职调查程序。

### **2.3 Enhanced Due Diligence for High-Risk Supply Chains**

According to the requirements of the LBMA Silver Guidance, if a supply chain is assessed to involve high-risk issues, enhanced due diligence procedures are triggered. During 2025, the company's silver supply chain identified raw materials from the Democratic Republic of the Congo (DRC) and Mexico as high-risk supply chains, thereby triggering enhanced due diligence procedures.

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，对于单个供应商的强化尽职调查的实地评估工作，每年至少开展一次强化尽职调查工作；若供应商运营或所在国别地区无重大情况变化，则安排每两年开展一次实地评估；若有重大情况变化，则每年开展一次；对于无法开展实地评估的供应商，则采取桌面调研的替代方案，每年度至少进行一次，并保持持续监控，每半年更新风险评估状况。

Starting from the strict control of supply chain risks, the company has formulated management measures in accordance with the content stipulated in the LBMA Silver Guidance, clarifying that corresponding EDD measures are initiated based on the material type for supply chains that trigger enhanced due diligence, and then identifying the nature of risks involved in high-risk supply chains — divided into themes such as conflict, environment, social, governance, etc. For on-site assessment of enhanced due diligence for individual suppliers, enhanced due diligence is conducted at least once a year; if there are no significant changes in the supplier's operations or the country/region where it is located, an on-site assessment is arranged every two years; if there are significant changes, it is conducted once a year; for suppliers where on-site assessment cannot be carried out, desktop research is adopted as an alternative, conducted at least once a year, with continuous monitoring and risk assessment status updated every six months.

2025 年 3 月 21 日，公司审议通过参与刚果金 LCS 的实地评估项目，合规办公室前期联系了国内同行企业和行业协会以及有开展实地评估资质的咨询公司，

最终确定与 LCS 取得联系并征得同意配合开展实地评估。后续委托代理招标公司进行公开招标流程，最终与中标单位签订合同，并派遣专家团队赴实地开展评估工作，并整理为详细的实地评估报告。

On March 21, 2025, the company approved participation in the on-site evaluation project for LCS in the Democratic Republic of the Congo. The Compliance Office initially contacted domestic peer companies, industry associations, and consulting firms with qualifications for conducting on-site evaluations. Ultimately, contact was made with LCS, and their consent to cooperate in the evaluation was obtained. Subsequently, the company entrusted an agency to carry out an open bidding process. A contract was signed with the winning bidder, and an expert team was dispatched to conduct the on-site evaluation, with the findings compiled into a detailed on-site evaluation report.

其中组建的评估团队由三名深耕供应链尽责管理与 ESG 领域的资深专家组成，平均从业经验超过 10 年。团队成员具备硕士学历及多项国内外权威审核资质（如 FSC、Copper Mark 及 CCAA 注册审核员等），系统精通 OECD 及中国五矿商会尽责调查框架。团队拥有极强的全球实地审核能力，尤其在刚果（金）、赞比亚、印尼等高风险地区具备丰富的现场评估经验，项目涵盖矿山及冶炼全环节。专家组擅长将国际标准转化为结构化评估工具，能够通过现场走访、利益相关方访谈及证据链构建，对企业尽责管理体系的有效性作出独立、客观的专业判定。

The evaluation team formed consists of three senior experts with extensive experience in supply chain due diligence management and ESG fields, with an average of over 10 years of industry experience. The team members hold Master's

degrees and possess multiple domestic and international authoritative auditing qualifications (such as FSC, Copper Mark, and CCAA registered auditors, etc.), and are well-versed in the OECD and China Nonferrous Metals Industry Association due diligence frameworks. The team has strong global on-site auditing capabilities, particularly in high-risk areas such as the Democratic Republic of the Congo, Zambia, and Indonesia, and has extensive on-site evaluation experience covering the entire mining and smelting process. The expert group excels in translating international standards into structured evaluation tools, and can make independent, objective professional assessments of the effectiveness of corporate due diligence management systems through site visits, stakeholder interviews, and evidence chain construction.

专家团队于 2025 年 7 月 28-29 日，围绕六大类风险（威胁融资、安全与人权、严重侵犯人权行为、手工与小规模采矿风险、政府支付与税费合规性、环境与社会治理问题）对 LCS 进行了实地评估。评估发现，公司在员工管理、童工预防、安保措施、税费缴纳、反贿赂与反腐败等方面均符合要求，未涉及相关风险。总体而言，LCS 在绝大多数评估项目中表现良好，风险等级被判定为低风险。

From July 28 to 29, 2025, the expert team conducted an on-site assessment of LCS focusing on six categories of risks (financing of threats, security and human rights, serious human rights violations, artisanal and small-scale mining risks, government payments and tax compliance, and environmental and social governance issues). The assessment found that the company complied with requirements in areas such as employee management, child labor prevention, security measures, tax payment, anti-bribery and anti-corruption, and was not involved in any related risks.

Overall, LCS performed well in the vast majority of assessment items, and its risk level was determined as low risk.

对于其余未能取得联系无法开展实地评估的高风险供应商，我们采取了桌面调研的替代方案。桌面调研团队由合规管理办公室的两名合规专员组成。两位成员分别担任质量计量课与原料课的业务助理，在原材料品质监控、计量数据管理及供应链源头追溯领域拥有扎实的专业背景；在资历与专业能力方面，该团队成员连续两年参加行业协会组织的矿产供应链企业内审员专项培训，并获得资质证书。且两位成员近三年均全程参与协调公司年度 LME 和 LBMA 矿产供应链的合规管理审计工作。其凭借在质量控制与原料管理一线的实操经验，能够精准执行针对供应商的资信调查及供应链透明度核查，确保桌面评估过程中文件审核的客观性与证据链的完整性。

For the remaining high-risk suppliers that could not be contacted and for whom on-site evaluations could not be carried out, we adopted a desk-based research alternative. The desk-based research team consists of two compliance officers from the Compliance Management Office. The two members serve as business assistants in the Quality and Measurement Department and the Raw Materials Department, respectively, with a solid professional background in raw material quality monitoring, measurement data management, and supply chain traceability. In terms of qualifications and professional capabilities, the team members have participated in the industry association's internal auditor training for mineral supply chain enterprises for two consecutive years and have obtained qualification certificates. Additionally, both members have been fully involved in coordinating the company's annual LME and LBMA mineral supply chain compliance audits for the past three years. With their

hands-on experience in quality control and raw material management, they are able to precisely execute supplier credit investigations and supply chain transparency checks, ensuring the objectivity of document reviews and the completeness of the evidence chain during the desk-based evaluation process.

通过筛查 2025 年度的供应链情况，我们识别到来自刚果金、墨西哥的铜精矿原产国涉及高风险地区，桌面调研团队围绕威胁融资、安全与人权、严重侵犯人权行为、支持或间接非政府武装安保、政府支付与税费合规性、环境与社会治理问题、国际政府相关报告和媒体报道等资源进行风险识别与评估，详细识别情况如下：

Through screening the supply chain situation for 2025, we identified that the countries of origin for copper concentrates from the Democratic Republic of the Congo and Mexico involve high-risk regions. The desk-based research team conducted risk identification and assessment based on resources such as threat financing, security and human rights, serious human rights violations, support for or indirect involvement with non-governmental armed security, government payments and tax compliance, environmental and social governance issues, international government reports, and media coverage. The detailed identification results are as follows:

Lonshi (刚果金)：严重侵权方面，该国矿业存在系统性人权侵犯，但 Lonshi 未被媒体或国际组织点名存在严重侵权行为，2025 年度未发现大规模非正规采矿者入侵或驱逐冲突；非国家武装团体方面，该国东部武装组织活跃，但 Lonshi 位于南部 Katanga 省远离冲突区，矿权有效，未发现向武装团体提供支持；公共或私人安保方面，该国普遍存在安全部队侵权现象，但 Lonshi 未发现相关负面

报道；税费与贿赂方面，Lonshi 可在 EITI 网站查询披露信息，审核周期内无行贿受贿、洗钱等指控；ESG 方面，未查到公开 ESG 报告，但无违反环境、劳工法规的新闻报道。综上所述，Lonshi 风险等级被判定为低风险。

Lonshi (Democratic Republic of the Congo): In terms of serious human rights violations, the mining sector in this country suffers from systemic human rights abuses, but Lonshi has not been named by media or international organizations for serious violations. No large-scale informal miner incursions or eviction conflicts were found in 2025. Regarding non-state armed groups, armed groups are active in the eastern part of the country, but Lonshi is located in the southern Katanga province, far from conflict zones, with valid mining rights, and no support to armed groups was found. Regarding public or private security, human rights violations by security forces are common in the country, but no negative reports related to Lonshi were found. Regarding taxes and bribery, Lonshi's disclosed information can be queried on the EITI website, and there were no allegations of bribery, corruption, money laundering, etc., during the audit period. Regarding ESG, no public ESG report was found, but there are no news reports of violations of environmental or labor regulations. In summary, Lonshi's risk level is determined as low risk.

Kupari (墨西哥)：严重侵权方面，墨西哥采矿业童工主要集中在非正规小矿，Kupari 未发现雇佣童工或强迫劳动负面报道；非国家武装团体方面，墨西哥存在贩毒集团活动，Kupari 矿区位于非大规模冲突区，股权结构不涉及武装团体，未发现向其提供支持；公共或私人安保方面，未发现安保人员滥用武力或侵犯社区人权的报道；税费与贿赂方面，未在 EITI 发现独立披露记录，但无洗钱或偷

逃税款指控；ESG 方面，审核周期内未识别到环境破坏或大规模侵犯劳工权益的负面舆情。综上所述，Kupari 风险等级被判定为低风险。

Kupari (Mexico): In terms of serious human rights violations, child labor in Mexico's mining sector is mainly concentrated in informal small-scale mines, and no negative reports of child labor or forced labor were found for Kupari. Regarding non-state armed groups, drug cartels are active in Mexico, but the Kupari mining area is located in a non-large-scale conflict zone, its equity structure does not involve armed groups, and no support to such groups was found. Regarding public or private security, no reports of security personnel abusing force or violating community human rights were found. Regarding taxes and bribery, no independent disclosure records were found on the EITI website, but there are no allegations of money laundering or tax evasion. Regarding ESG, no negative public opinion regarding environmental damage or large-scale violations of labor rights was identified during the audit period. In summary, Kupari's risk level is determined as low risk.

Tayahua（墨西哥）：严重侵权方面，未发现雇佣童工或强迫劳动负面报道；非国家武装团体方面，所在萨卡特卡斯州治安复杂，但企业股权不涉及武装团体，未发现提供支持；公共或私人安保方面，未发现安保侵权报道；税费与贿赂方面，无洗钱或偷逃税款指控；ESG 方面，未识别到环境或劳工负面舆情。综上所述，Tayahua 风险等级被判定为低风险。

Tayahua (Mexico): In terms of serious human rights violations, no negative reports of child labor or forced labor were found; regarding non-state armed groups, the security situation in the state of Zacatecas is complex, but the company's equity does not involve armed groups, and no support to such groups was found; regarding

public or private security, no reports of security-related human rights violations were found; regarding taxes and bribery, no allegations of money laundering or tax evasion; regarding ESG, no negative public opinion on environmental or labor issues was identified. In summary, Tayahua's risk level is determined as low risk.

**Buenavista (墨西哥)**：严重侵权方面，历史上有工会劳资纠纷，但无“强迫劳动”等极端侵权指控；非国家武装团体方面，位于索诺拉州，未发现向武装团体提供支持；公共或私人安保方面，未发现安保侵权报道；税费与贿赂方面，作为上市公司子公司，财报披露了税收和特许费信息；ESG方面，2025年未发现重大环境违规，发布了可持续发展报告，通过CopperMark风险准备度评估标准指南认证，符合负责任白银采购标准。综上所述，Buenavista风险等级被判定为低风险。

**Buenavista (Mexico)**: In terms of serious violations, there have been historical labor disputes with trade unions, but there are no extreme violations such as "forced labor" allegations. Regarding non-state armed groups, located in Sonora state, no evidence was found of support provided to armed groups. In terms of public or private security, no reports of security-related violations were found. Regarding taxes and bribery, as a subsidiary of a listed company, financial reports disclose tax and royalty information. In terms of ESG, no significant environmental violations were found in 2025, and the company has published a sustainability report. It has also been certified through the CopperMark Risk Preparedness Assessment Standard Guidelines, meeting the Responsible Silver Sourcing Standards. Based on the above, Buenavista's risk level is determined to be low.

### 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 2025 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 2025 年风险评估结果，我们未发现供应链存在高风险行为，故 2025 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, 2025, the company has fully complied with Step 3: Design and Implement Strategies to Respond to Identified Risks.**

Based on the 2025 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 2025. 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

2025 年底，合规管理办公室整理并汇总了全年所有尽职调查材料，经办公室主任审核，未发现来自零容忍供应链，但有来自高风险地区的物料。在执行了

强化尽职调查程序后排除了政策中所列风险，即 2025 年度公司原料供应链未识别出零容忍风险和政策中列出的风险。在此基础上，办公室对全年供应链情况进行风险评估，形成风险评估结果汇总表，将全年风险情况总结为低风险结论，并向合规官汇报；同时总结 2025 年度供应链尽职调查工作，制定下一年度工作计划，形成合规报告。合规官对上述材料审核后，报合规委员会审批，审批通过后将合规报告在公开网站上进行公示。

### **3.3 Reporting Investigation Results to the Compliance Management Committee**

At the end of 2025, the Compliance Management Office compiled and summarized all due diligence materials for the year. After review by the Office Director, no materials from zero-tolerance supply chains were found, although some materials were identified from high-risk regions. After implementing enhanced due diligence procedures, the risks listed in the policy were mitigated, meaning that no zero-tolerance risks or risks listed in the policy were identified in the company's raw material supply chain for 2025. On this basis, the office conducted a risk assessment of the entire year's supply chain situation, created a risk assessment report, and concluded that the overall risk was low. This report was then submitted to the Compliance Officer for review. Simultaneously, the office summarized the 2025 supply chain due diligence work, developed the work plan for the next year, and prepared the compliance report. After the Compliance Officer reviewed the materials, they were submitted to the Compliance Committee for approval. Once approved, the compliance report was publicly posted on the official website.

#### **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 2025 年 2 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 February 2025.

对于第三方审计单位的选定，我们委托固定合作的招标代理公司为我们进行招标工作。首先合规办公室提出委托申请，明确代理服务范围、时间要求及预算。核实预合作单位其营业执照、代理资质、过往履约记录及是否存在负面舆情，确保其持续符合企业准入标准。复核通过后，双方依据框架协议明确服务内容、收费标准及双方权利义务。代理机构依约组织招标活动（如发布公告、编制文件、组织开评标等）。合规办公室对委托及代理过程形成记录，连同复核材料汇总为合规报告，经合规官审核、合规委员会审批后归档备查。定期对固定合作方进行履约评价，纳入供应商动态管理，确保持续合规。

For the selection of third-party audit units, we entrust a fixed cooperative bidding agency to carry out the bidding work for us. First, the Compliance Office submits an entrustment application, specifying the scope of agency services, time requirements, and budget. It verifies the prospective cooperative unit's business license, agency qualifications, past performance records, and whether there is any negative public opinion, ensuring its continued compliance with the enterprise's access standards. After the review is approved, both parties clarify the service content, fee standards, and rights and obligations of both parties in accordance with the framework agreement. The agency organizes bidding activities as agreed (e.g., issuing

announcements, preparing bidding documents, organizing bid opening and evaluation, etc.). The Compliance Office records the entrustment and agency process, compiles these records together with the review materials into a compliance report, which is submitted to the Compliance Officer for review and the Compliance Committee for approval, and then filed for future reference. Regular performance evaluations of fixed cooperative partners are conducted and incorporated into the dynamic management of suppliers to ensure continued compliance.

根据 2025 年 10 月份精炼厂收到 LBMA 的通知，必维认证（北京）有限公司上海分公司（以下简称 BV 公司）被取消审核资质，本年度我们通过公司的对外招标流程，重新将 RSG2.0 鉴证审核业务委托 SLR Consulting Limited (henceforth “SLR”)并签订协议书。2025 年度的审计将参照 ISAE3000 的方法执行，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。

According to the notice received by the refinery from LBMA in October 2025, Bureau Veritas Certification (Beijing) Co., Ltd. Shanghai Branch (hereinafter referred to as "BV Company") had its audit qualification revoked. This year, through the company's external bidding process, we re-entrusted the RSG 2.0 assurance audit business to SLR Consulting Limited (henceforth “SLR”) and signed an agreement. The 2025 audit will be conducted in accordance with the ISAE 3000 methodology, carrying out an independent third-party audit of our compliance with the *LBMA Responsible Silver Guidance*.

2025 年 2 月 BV 公司对我司进行了审计，在这次审计中提出了两个中风险不符合项：I. 精炼商没有明确董事会或董事会任命的委员会的职责包含定期评估供应链尽职调查政策和流程的有效性，因此实际上也没有就供应链尽职调查政策和

流程的有效性进行定期评估。II. 精炼商在开展供应商尽职调查时，针对其中 2 家供应商没有使用 KYC 调查问卷，另有 2 家没有识别供应商的 ESG 风险；和一个低风险不符合项：合规报告披露的内容不充分，以下内容没有披露：董事会或董事会任命的委员会的职责。

In February 2025, BV Company conducted an audit of our company and identified two medium-risk non-compliances:

I. The refiner has not clearly defined the responsibilities of the Board of Directors or the committee appointed by the Board, which should include the regular evaluation of the effectiveness of the supply chain due diligence policies and processes. As a result, there has been no regular evaluation of the effectiveness of the supply chain due diligence policies and processes.

II. During the supplier due diligence process, the refiner did not use KYC questionnaires for two suppliers, and for another two, ESG risks were not identified.

Additionally, one low-risk non-compliance was noted: the compliance report did not disclose sufficient information, including the responsibilities of the Board of Directors or the committee appointed by the Board.

针对中风险不符合项 I，修订公司《供应链尽职调查管理办法》及《合规管理委员会管理办法》，在董事会任命的合规管理委员会职责条款中，增加“每年度对供应链尽职调查政策及流程的有效性进行系统性评估”的明确要求。于 2025 年 3 月 21 日公司召开了关于矿产供应链合规管理工作会议，其中针对白银供应链尽职调查管理相关政策文件内容进行了审议与批准。并且 2026 年 1 月 9 日，合规管理办公室开展了白银供应链尽职调查内部评审，审查了公司 2025 年 1 月

1 日至 12 月 31 日的运行情况，尽职调查五步骤及相关文件，最终形成内部评估报告。今后将在每年第一季度完成上一年度的有效性评估，确保机制持续运行，故该中风险的问题点已经被关闭。

In response to the medium-risk non-compliance item I, the company revised its "*Supply Chain Due Diligence Management Measures*" and "*Compliance Management Committee Management Measures*" The responsibilities of the Compliance Management Committee, as outlined in the terms of reference appointed by the Board of Directors, now explicitly include the requirement to conduct a systematic annual evaluation of the effectiveness of the supply chain due diligence policies and processes. On March 21, 2025, the company held a meeting on mineral supply chain compliance management, during which the relevant policy documents for silver supply chain due diligence were reviewed and approved. Additionally, on January 9, 2026, the Compliance Management Office conducted an internal review of the silver supply chain due diligence, examining the company's operations from January 1 to December 31, 2025, the five-step due diligence process, and relevant documents, ultimately producing an internal evaluation report. Going forward, the effectiveness evaluation for the previous year will be completed in the first quarter of each year to ensure the continuous operation of the system. Therefore, this medium-risk issue has been resolved.

关于中风险不符合项 II，对上述 4 家供应商补充完成尽职调查：针对缺失 KYC 问卷的 2 家供应商，重新发送并回收完整填写的 KYC 调查表，核实其身份、所有权结构及合规信息；针对未识别 ESG 风险的 2 家供应商，依据公司《白银

供应链尽职调查管理办法》的要求补充收集其环境、社会及治理方面的信息，完成风险评估记录，故该中风险的问题点已经被关闭；

Regarding medium-risk non-compliance item II, supplementary due diligence was completed for the four suppliers mentioned above. For the two suppliers missing the KYC (Know Your Customer) questionnaire, the KYC forms were resent and fully completed questionnaires were retrieved, verifying their identity, ownership structure, and compliance information. For the two suppliers where ESG risks had not been identified, additional information was collected on their environmental, social, and governance aspects in accordance with the company's "*Silver Supply Chain Due Diligence Management Measures*" and risk assessment records were completed. Therefore, this medium-risk issue has been resolved.

关于低风险不符合项，我们重新梳理了合规报告的内容表述，并补充了合规报告中关于合规管理委员会的职责内容的表述。上述所有的不符合项的关闭均在 90 天以内完成并将附件材料提交审计公司，故该低风险的问题点已经被关闭。

Regarding the low-risk non-compliance items, we reorganized the content and statements in the compliance report and added a description of the responsibilities of the Compliance Management Committee. All of the above-mentioned non-compliance issues were resolved within 90 days, and the supporting materials were submitted to the auditing company. Therefore, this low-risk issue has been resolved.

2026 年 3 月 19 日-20 日，SLR 审核员专家对我司开展为期两天的 2025 年度白银供应链尽职调查体系审计工作。在此次审计中，未发现任何风险项。这

表明公司在白银供应链的合规管理体系和尽职调查程序运行有效，符合《LBMA 负责任白银指南》第二版以及《LBMA 负责任采购披露指南》第三版的标准要求。体现了公司在保持供应链透明度、遵守国际标准规范以及符合负责任采购指南方面的承诺。

From March 19 to 20, 2026, SLR auditors conducted a two-day audit of the company's silver supply chain due diligence system for the 2025 fiscal year. No risk items were identified during this audit. This indicates that the company's compliance management system and due diligence procedures for the silver supply chain are operating effectively and meet the standards outlined in the second edition of the *LBMA Responsible Silver Guidance* and the third edition of the *LBMA Responsible Sourcing Disclosure Guidance*. It reflects the company's commitment to maintaining supply chain transparency, adhering to international standards, and complying with responsible sourcing guidelines.

## 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（2025 年）》，此报告汇报了截至 2025 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>，同时也发布了关于非强迫劳动和尊重人权的声明 <http://www.jinlongcopper.com/information/infoshow.aspx?cid=852&classid=467> 以及 2024 年度独立审计鉴证报告以及非强迫劳动的鉴证报告 <http://www.jinlongcopper.com/information/infoshow.aspx?cid=851&classid=467>，以方便利益相关方查看或下载。预计 2025 年度的独立审计鉴证报告以及非强迫劳

动的鉴证报告将于 2026 年 5 月 31 日前在公司官网公开披露。

## **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.**

The company, in accordance with the "*LBMA Responsible Silver Guidance*," has released the Jinlong Copper Co., Ltd. "Silver Due Diligence Compliance Report (2025)." This report provides an update on the company's silver supply chain due diligence as of December 31, 2025. It has been publicly disclosed on the company's official website at <http://www.jinlongcopper.com/information/infoabout.aspx?parentclassid=406&classid=467>. Additionally, a statement on non-forced labor and respect for human rights has been released at <http://www.jinlongcopper.com/information/infoshow.aspx?cid=852&classid=467>, along with the 2024 independent audit verification report and non-forced labor verification report at <http://www.jinlongcopper.com/information/infoshow.aspx?cid=851&classid=467>

for stakeholders' reference or download. The 2025 independent audit verification report and non-forced labor verification report are expected to be publicly disclosed on the company's official website before May 31, 2026.

## **三、管理结论**

截至 2025 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 2025 年编制了供应链尽职调查报告。

## **III. Management Conclusion**

As of December 31, 2025, 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 2025.

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](mailto:jcc@jinlongcopper.com).