



广西南丹南方金属有限公司  
Guangxi Nandan Nanfang Metal Company Limited

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广西南丹南方金属有限公司  
2024年度精炼厂合规报告  
(2024/01/01-2024/12/31)

**Guangxi Nandan Nanfang Metal Company Limited**  
**2024 Refiner's Compliance Report**  
**(Published in February 2025)**



公司名称 Company Name	广西南丹南方金属有限公司 Guangxi Nandan Nanfang Metal Company Limited
公司地址 Location	广西河池南丹工业园区 Nandan Industrial Park, Hechi, Guangxi, China
报告年终 Reporting year-end	2024年12月31日 December 31st, 2024
报告日期 Date of Report	2025年2月6日 February 6, 2025
负责本报告的高级管理层 Senior management responsible for this report	荆涛 合规总监 Mr. Tao Jing Compliance Director 盆强 合规组长 Mr. Qiang Pen Compliance Supervisor

## 第一部分 Part I

### 目的 Purpose

为了符合《伦敦金银市场协会负责任的白银指南》的要求，避免任何的系统性或广泛性的侵犯人权行为、避免产生冲突，洗钱和打击恐怖主义融资行为，我司通过建立强大的管理体系，采用供应链尽职调查方法对所有供应商进行风险识别和评估，确保本公司的白银供应链完全符合LBMA负责任白银指南的要求。

To comply with the requirements of the *London Bullion Market Association (LBMA) Responsible Silver Guidance*, avoid any systematic or widespread human rights violations, conflicts, money laundering and combat terrorist financing, we have established a strong management system and using supply chain due diligence methods to identify and evaluate risk for all suppliers, make sure the silver supply chain of the company fully complies with the requirements of the *LBMA Responsible*



*Silver Guidance.*

本报告总结了广西南丹南方有限公司2024年1月1日至2024年12月31日对《伦敦金银市场协会负责的白银指南》要求的遵守情况。

This report summarizes the compliance of Guangxi Nandan Nanfang Metal Company Limited to the requirements of the *London Bullion Market Association (LBMA) Responsible Silver Guidance*, from January 1, 2024 to December 31, 2024.

## 第二部分 Part II

### 工厂概况 Company Profile

广西南丹南方金属有限公司始建于1996年，注册资金14.8亿元，总资产71亿元，是一家集矿山开发、有色金属铅、锌、铜、锑冶炼、国际贸易、技术研发、资源综合回收于一体的大型民营企业。公司主要产品为国标1#电解铅，综合回收白银、黄金、次氧化锌、锑、铋、硫酸等副产品。公司目前占地面积2000余亩，员工1000余人。公司目前铅、银、锑、铋的产能在国内同行业排前三位，是广西区内最大的有色金属加工企业。

公司在2002年通过了ISO9001质量管理体系、2012年通过ISO14001环境管理体系和OHSAS18001职业健康体系认证并取得认证证书，2020年通过ISO45001职业健康体系换标认证并取得认证证书。

Guangxi Nandan Nanfang Metal Company Limited was founded in 1996, with a registered capital of 1.48 billion yuan and a total asset of 7.1 billion yuan. It is a large private enterprise which integrates mining and mountain development, non-ferrous lead, zinc, copper, antimony smelting, international trade, technology research and development, and comprehensive recovery of resources. The main products of the company are the national standard 1 # electrolytic lead, the comprehensive recovery of silver, gold, zinc oxide, antimony, bismuth, sulfuric acid and other by-products. At present, the company covers more than 2,000 mu and has more than 1,000 employees. The company has the production capacity of lead, silver, antimony and bismuth



among the top three in China, and is the largest non-ferrous metal processing enterprise in Guangxi.

The company passed the ISO9001 quality management system in 2002, the ISO14001 environmental management system and the OHSAS18001 occupational health system certification and obtained the certification certificate in 2012 and passed the ISO45001 occupational health system change certification and obtained the certification certificate in 2020.

### 第三部分 Part III

#### 合规活动总结 Summary of compliance activities

第1步：建立强有力的公司管理体系

Step 1 : Establish a strong company management system

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合规声明 Compliance statement

我们完全符合第一步：建立强大的管理体系。

We have fully complied with the first step: Established a strong management system.

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#### 公司政策 Company Policy

合规陈述：Compliance statement:

根据《伦敦贵金属市场协会LBMA负责任白银指南》准则的要求，我们于2019年7月1日发布了第一版《白银供应链尽职调查政策》及《白银供应链尽职调查办法》，2023年5月对条款再次进行了完善，我们承诺白银供应链不得有如下行为：

对开采、运输或交易矿产品而引起的大规模滥用人权的行为包括但不限于以下行为：

- 1) 可能存在有关白银提取、运输或贸易的系统性或广泛人权侵犯行为，包括使用童工、酷刑、非人道以及侮辱人格对待方式、广泛的性暴力或其他严重反人权强迫劳动、战争罪、反人类罪或种族灭绝罪；



- 2) 向非法的非政府武装组织提供直接或间接支持；
- 3) 通过贿赂或欺诈掩盖白银原产地；
- 4) 未遵照政府有关来自受冲突及高风险区域的矿产品的提取、贸易及出口税费要求；
- 5) 洗钱或恐怖主义融资；
- 6) 资助冲突；
- 7) 从事高风险经营业务，例如武器、赌博、古董和艺术品、教派和其领导人；
- 8) 受益人是政治敏感人物或通缉人员。

白银供应链尽职调查管理体系中规定了内部的组织架构及责任、白银供应链尽职调查规定、白银供应链的风险识别方法和评判标准、交易监控、文件保存、培训以及报告机制。

从2024年1月到2024年12月，公司严格按照体系要求完成对所有白银供应链的尽职调查、风险识别和评估，有效控制白银供应链的风险。

公司已将该政策发布在官方网站上，网址为：

<https://www.nanfangmetal.com>

According to the guidelines of *London Bullion Market Association (LBMA) Responsible Silver Guidance*, we issued the first edition of the *Silver Supply Chain Due Diligence Policy* and the *Silver Supply Chain Due Diligence Regulations* on July 1, 2019. And the terms were improved again on May 2023. We promise that the silver supply chain shall not commit the following behavior:

Mass abuse of human rights resulting from mining, transportation or trading mining products include but are not limited to the following:

- 1) There may be systemic or widespread human rights violations concerning the



extraction, transportation or trade of silver, including the use of child labor, torture, inhuman and insulting personality treatment, extensive sexual violence or other serious forced labor against human rights, war crimes, crimes against humanity, or genocide;

- 2) Direct or indirect support to illegal armed non-governmental organizations;
- 3) Covering silver origin through bribery or fraud;
- 4) Failure to comply with government tax requirements for extraction, trade and export of minerals from conflict-affected and high-risk areas;
- 5) Money laundering or terrorist financing;
- 6) Contribute to conflict;
- 7) Higher-risk business activities such as weapons, gambling, antiques and art, sects and their leaders;
- 8) Beneficiaries are politically sensitive or wanted.

The *Silver Supply Chain Due Diligence Regulations* stipulate the internal organization structure and responsibilities, silver supply chain due diligence methods, silver supply chain risk identification methods and judgement standards, transaction monitoring, document storage, training and reporting mechanisms.

From January 2024 to December 2024, we completed the due diligence of all silver suppliers in strict accordance with the system requirement and carried out risk identification and evaluation to effectively control the risks of silver supply chain.

At the same time, the company has posted the policy on its official website at

<https://www.nanfangmetal.com>

内部管理架构 **Internal management structure**



合规陈述：Compliance statement:

公司为白银供应链尽职调查工作设立了专门的合规小组，明确了管理岗位以及对应的职责，公司包括一名合规总监，一名合规组长和六名合规专员。由于2024年公司组织机构及人事的变动，公司合规小组成员进行了相应的调整，具体如下：公司的合规总监由集团副总经理荆涛担任，合规组长由集团企业管理部企业安环管理科科长盆强担任，财务部合规专员由覃志健、苏少金担任，经营管理部合规专员由杨贵雄担任，原料供应部的合规专员由李钰鑫担任，企业管理部的合规专员由蒙英宁担任，生产部门的合规专员由覃贾担任。他们的职责如下：

The company has established a compliance team for due diligence in the silver supply chain, identifying management positions and corresponding responsibilities, including a compliance director, a compliance supervisor and six compliance officers. Due to the company organization structure and changes of personnel in 2024, the compliance team members of the company has adjusted accordingly as specific below: the company's compliance director is Jing Tao, deputy general manager of the group. The compliance supervisor is Pen Qiang, section chief of enterprise safety and environment management section which subjects to enterprise management department. The compliance officer of finance department is Qin Zhijian, Su Shaojin. The compliance officer of the business management department is Yang Guixiong. The compliance officer of the domestic material supply department is Li Yuxin. The compliance officer of the enterprise management is Meng Yingning. The compliance officer of the production department is Qin Jia. Their duties are as follows:

合规总监职责：

- 1) 全面负责公司白银供应链尽职调查工作。
- 2) 监督检查白银供应链尽职调查过程，并评估尽职调查是否充分进行；如果认为有必要，则要求提供附加文件或信息。



- 3) 对已识别出风险的白银供应链或交易时，采取现场/远程评估等措施以减少风险直至消除风险。
- 4) 如果存在高风险白银供应链或交易时，应及时向公司高管层汇报并采取严格的控制措施；在得到最高管理者授权后负责审批被评为高风险的新白银供应链。
- 5) 为公司高管层履行尽职调查责任提供必要的准确信息。
- 6) 监督和检查并定期参加关于白银供应链尽职调查政策的培训。

Responsibilities of Compliance Director:

- 1) In charge of and be fully responsible for the silver supply chain due diligence work of the company.
- 2) Monitor and inspect the due diligence process in the silver supply chain and evaluate whether the due diligence is adequately conducted; if necessary, additional documents or information is required.
- 3) Takes appropriate actions such as on-site/remote assessment to reduce and eliminate risks in the silver supply chain or transactions where risks have been identified.
- 4) In case there is a high-risk silver supply chain or transaction, promptly report it to the senior management of the company and take strict control measures; be responsible for approving new silver supply chains that are rated as high-risk after authorized by the senior management.
- 5) Provide necessary and accurate information for the company's senior management to fulfill their due diligence responsibilities.
- 6) To supervise and inspect and regularly participate in training on silver supply chain due diligence policy.





合规组长的职责：

- 1) 辅助合规总监安排并开展公司白银供应链尽职调查工作，辅助合规总监监督检查白银供应链尽职调查过程，并收集相关资料。
- 2) 定期对员工进行责任白银准则和供应链尽职调查政策培训。
- 3) 负责起草和修订公司白银供应链相关的政策和方针。
- 4) 负责收集并汇总上报公司员工对白银供应链尽职调查工作的意见和建议。

Responsibilities of Compliance Supervisor:

- 1) Assisted the compliance director in arranging and carrying out the due diligence work of the silver supply chain of the company, assisted the compliance director in supervising and inspecting the due diligence process of the silver supply chain, and collected relevant information.
- 2) Regular training of employees on responsibility silver guidelines and supply chain due diligence policies.
- 3) Responsible for drafting and revising the company's silver supply chain related policies and guidelines.
- 4) Responsible for collecting and summarizing the opinions and suggestions of employees on due diligence of silver supply chain.

财务部合规专员职责：

- 1) 严格执行供应链尽职调查措施和高风险白银供应链评判标准。
- 2) 负责收集并保存足够的白银供应链证明文件。
- 3) 完整保存白银供应商的所有交易及财务凭证，保存期限为至少5个财务年度。
- 4) 评估白银供应商财务数据，理清其商业关系目的和本意信息。
- 5) 负责收集并督促进口商完成相应的尽职调查报告。
- 6) 核实船代公司、运输公司资质，跟踪和妥善保管每一批运单，分析和评估货物所经过的运输路线。
- 7) 定期对主要国外供应商进行现场调查。



8) 协助与鼓励国外供应商承诺且书面确认遵守《OECD 冲突影响地区和高风险地区矿产品责任供应链尽职调查指南》附录 II 中的规定。

9) 对已识别出风险的白银供应链或交易时，组织参与采取现场/ 远程评估等措施以减少风险直至消除风险。

10) 尽职调查过程和白银交易出现异常情况及时向合规组长报告。

11) 定期参加关于责任白银指南和供应链尽职调查政策的培训。

Responsibilities of Compliance Officer of Finance Department:

- 1) Strictly implement supply chain due diligence measures and high-risk silver supply chain evaluation standards.
- 2) Be responsible for collecting and preserving sufficient silver supply chain documents.
- 3) Completely keep all transactions and financial documents of silver suppliers for a period of at least 5 financial years.
- 4) Evaluate the financial data of silver supplier and clarify the purpose and original intention information of their business relations.
- 5) Be responsible for collecting and urging importers to complete corresponding due diligence reports.
- 6) Verify the qualifications of shipping agents and transportation companies, track and properly keep each shipping document, and analyze and evaluate the transportation routes through which the goods pass.
- 7) Conduct regular on-site investigations of major foreign suppliers.
- 8) Assist and encourage foreign suppliers to commit and confirm in writing that they comply with the provisions in Appendix II of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High- Risk Areas*.



- 9) Be responsible for organization to participate in taking measures such as on-site/remote assessments to reduce risks until risks are eliminated in silver supply chains or transactions where risks have been identified.
- 10) Report to the Compliance Supervisor in case of abnormality in the due diligence process and silver transaction.
- 11) Regularly participate in training on the responsible silver guidelines and the supply chain due diligence policy.

经营管理部合规专员的职责：

- 1) 严格执行供应链尽职调查政策和高风险白银供应链评判标准。
- 2) 负责收集并保存足够的白银供应链证明文件。
- 3) 负责收集并督促国内客户完成相应的尽职调查报告。
- 4) 定期对主要国内客户进行现场调查。
- 5) 负责收集并督促出口商完成相应的尽职调查报告。
- 6) 尽职调查过程和白银交易出现异常情况及时向合规组长报告。
- 7) 定期参加关于责任白银指南和供应链尽职调查政策的培训。

Responsibilities of the Compliance Officer of the Business Management Department:

- 1) Strictly implement the supply chain due diligence regulations and high-risk silver supply chain evaluation criteria.
- 2) Be responsible for collecting and maintaining sufficient silver supply chain documents.
- 3) Be responsible for collecting and urging domestic clients to complete corresponding due diligence reports.
- 4) Regular on-site investigations of major domestic clients.
- 5) Be responsible for collecting and urging exporters to complete corresponding due diligence reports.
- 6) Report to the Compliance Supervisor in case of abnormality in the due diligence



process and silver transaction.

- 7) Regularly attends training on the accountability guidelines and supply chain due diligence policy.

原料供应部合规专员的职责：

- 1) 严格执行供应链尽职调查措施和高风险白银供应链评判标准。
- 2) 负责收集并保存足够的白银供应链证明文件。
- 3) 负责收集并督促国内供应商完成相应的尽职调查报告。
- 4) 核实运输公司资质，跟踪和妥善保管每一批运单，分析和评估货物所经过的运输路线。
- 5) 定期对主要国内供应商进行现场调查。
- 6) 协助与鼓励国内供应商承诺且书面确认遵守《OECD 冲突影响地区和高风险地区矿产品责任供应链尽职调查指南》附录 II 中的规定。
- 7) 对已识别出风险的白银供应链或交易时，组织参与采取现场/ 远程评估等措施以减少风险直至消除风险。
- 8) 尽职调查过程和白银交易出现异常情况及时向合规组长报告。
- 9) 定期参加关于责任白银指南和供应链尽职调查政策的培训。

**Responsibilities of Compliance Officer of the Domestic Material Supply Department:**

- 1) Strictly implement the supply chain due diligence regulations and high-risk silver supply chain evaluation criteria.
- 2) Be responsible for collecting and maintaining sufficient silver supply chain documents.
- 3) Be responsible for collecting and urging domestic suppliers to complete corresponding due diligence reports.
- 4) Verify the qualifications of transportation companies, track and properly keep each shipping document, and analyze and evaluate the transportation routes through which the goods pass.



- 5) Conduct regular on-site investigations of major domestic suppliers.
- 6) Assist and encourage domestic suppliers to commit and confirm in writing that they comply with the provisions in Appendix II of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High- Risk Areas*.
- 7) Be responsible for organization to participate in taking measures such as on-site/remote assessments to reduce risks until risks are eliminated in silver supply chains or transactions where risks have been identified.
- 8) Report to the Compliance Supervisor in case of abnormality in the due diligence process and silver transaction.
- 9) Regularly attends training on the accountability guidelines and supply chain due diligence policy.

企业管理部合规专员的职责：

- 1) 严格执行供应链尽职调查政策和高风险白银供应链评判标准。
- 2) 负责收集并保存足够的白银供应链证明文件。
- 3) 核实并记录每一批收到的白银产品重量和化验结果，分析和评估这些数据是否与供应商链了解情况相符；如果不符则进行详细调查并做出书面调查报告。
- 4) 保留相关含银物料样品至少 3 个月以上。
- 5) 尽职调查过程和白银交易出现异常情况及时向合规组长报告。
- 6) 定期参加关于责任白银指南和供应链尽职调查政策的培训。

Responsibilities of the Compliance officer of the Enterprise Management Department:

- 1) Strictly implement the supply chain due diligence regulations and high-risk silver supply chain evaluation criteria.
- 2) Be responsible for collecting and maintaining sufficient silver supply chain documents.
- 3) Be responsible for verifying and recording the weight and assay results of each batch of silver products received, analyzing and evaluating whether the data are



consistent with the supplier chain; if not, conduct detailed investigation and produce a written investigation report.

- 4) Retention of relevant samples which containing silver for at least 3 months.
- 5) Report to the Compliance Supervisor in case of abnormality in the due diligence process and silver transaction.
- 6) Regularly attends training on the accountability guidelines and supply chain due diligence policy.

生产部门合规专员职责：

- 1) 严格执行供应链尽职调查政策和高风险白银供应链评判标准。
- 2) 负责收集并保存足够的白银供应链证明文件。
- 3) 监督每批次含银物料的生产使用过程并做相应记录，保存记录至少 3 年以上。
- 4) 尽职调查过程和白银交易出现异常情况及时向合规组长报告。
- 5) 定期参加关于责任白银指南和供应链尽职调查政策的培训。

Responsibilities Compliance Officer of Producing department:

- 1) Strictly implement the supply chain due diligence regulations and high-risk silver supply chain evaluation criteria.
- 2) Be responsible for collecting and maintaining sufficient silver supply chain documents.
- 3) Be responsible for supervising the production and use of each batch of silver materials and makes corresponding records, and saves these records for at least 3 years.
- 4) Report to the Compliance Supervisor in case of abnormality in the due diligence process and silver transaction.
- 5) Regularly attends training on the accountability guidelines and supply chain due diligence policy.



本报告年度内，公司严格执行《白银供应链尽职调查政策》及《白银供应链尽职调查办法》，对供应商进行风险尽职调查。对所有交易进行监控，以避免与高风险供应商建立关系。同时，合规小组对所有尽职调查发现的结果进行审查，所有的含银物料采购合同都经过了合规总监的审批。

During the reporting period, we strictly implemented the *Silver Supply Chain Due Diligence Policy* and *Silver Supply Chain Due Diligence Regulations* and carried out risk due diligence on suppliers. Monitor all transactions to avoid relationships with high-risk suppliers. At the same time, the compliance team reviews all due diligence findings and results, and all purchase contracts for silver-containing materials have been approved by the compliance director.

#### 供应链可追溯体系 **Traceability system of supply chain**

合规陈述：Compliance statement:

公司根据LBMA负责的白银指南要求，制定了供应链追溯体系，在业务过程中收集和保存所有供应商提供的信息，包括报盘、合同评审表、合同文本、运输、重量和检验报告、生产日期、入库时间、结算方式等。

根据保留的所有记录，可以完成从成品追溯到原料、从原料追溯到成品，并能追溯每个供应商每批产品的采购合同，根据合同内容可以追溯包括贵金属类型、采购重量、分析报告以及相关尽职调查文件等信息。

According to the requirements of the LBMA responsible silver guide, the company has developed a supply chain traceability system that collects and saves the information provided by all suppliers in the process of business, including business confirmation, contract review form, contract text, transportation, weight and inspection reports, production date, warehousing time, ways of settlement, etc.

According to all records retained, it is possible to complete the purchase contract of each batch of products from finished product to raw material, from raw material to finished product, and can trace back to each supplier according to the contents of the





contract, including precious metal type, purchase weight, analysis report and related due diligence documents, etc.

### 维护记录 **Maintaining records**

合规陈述： **Compliance statement:**

根据公司《白银供应链尽职调查政策》，所有与供应商相关的资料，包括尽职调查文件、风险评估表、合规文件、合同文本、检测记录、出入库记录等均保存五年以上。

According to the company's *Silver Supply Chain Due Diligence Policy*, all relevant information related to suppliers, including due diligence documents, risk assessment forms, compliance documents, contract texts, test records, incoming and outgoing records, etc., are kept for more than five years.

### 培训 **Training**

合规陈述： **Compliance statement:**

公司定期组织所有与白银有关联的部门进行了培训，2024年共组织了三次培训，培训时间和内容分别为：

2024年5月组织学习了《白银指南》（第二版）；2024年10月组织学习了高风险识别工具学习、矿产贸易各环节风险判定和识别内容，通过培训我们加深了对供应链风险的认识，明确了出现风险时应采取的措施。培训均进行了签到，保留了培训原始记录。

2024年起，公司明确了由原料供应部负责供应商能力建设工作，确定了以区域经理为责任人对供应商进行负责任采购培训。通过现场访谈、视频会议、电话会议等形式，对国内供应商宣讲了公司的负责任采购政策，解答了供应商有关疑问，公司要求原料供应部定期回访供应商，持续帮助其提升负责任能力水平。





The company regularly organizes training for all departments associated with silver, and three times in 2024. The training time and content are as follows:

We organized to study *London Bullion Market Association (LBMA) Responsible Silver Guidance (the second edition)* On May 2024; And we organized the study of high risk identification methods and risk determination and adjustment of all aspects of mineral trading on October 2024. Through the training we have deepened our understanding of supply chain risks and defined the measures to be taken when risks occur. The training was checked in and the original training records were maintained.

Since 2024, the company has stated that the raw material Supply Department is responsible for the capacity building of suppliers, and determined that the regional manager is the responsible person to conduct responsible procurement training for suppliers. Through on-site interviews, video conferences, teleconferences and other forms, the company explained the company's responsible procurement policy to domestic suppliers and answered their questions. The company required the raw material supply Department to regularly visit suppliers and continue to help them improve their responsible capacity.

### **通过官方银行渠道付款及与政府当局合作 Payment through official banking channel and Cooperation with government authorities**

合规陈述：Compliance statement:

公司所有业务均通过官方银行渠道收款和付款，没有任何现金交易。这些收付款都受到银行及国家财税部门的监督，并且每年进行财务审计。

All business of our company is collected and paid through bank channel, without any cash transaction. The payments are supervised by the bank and the state finance and taxation department, and the financial audit is carried out every year.



**交易方互动，并协助交易方监理尽职调查能力 Engagement with silver supplying counterparties, and where possible, assisted silver supplying counterparties in building due diligence capabilities**

合规陈述：Compliance statement:

与供应商签订合同时，业务人员要求白银原料供应商：1) 以合同条款形式明确原料供应链条需遵守OECD要求；或2) 签署《LBMA合规承诺书》；或3) 以其他书面形式确保原料供应链条遵守OECD要求。业务人员需确保所有白银原料供应商都了解并遵守LBMA的管理要求、政策以及所要求的承诺，确保所有白银供应商方都以书面形式承诺，不存在与矿产开采、运输、或贸易有关的严重侵犯人权行为，没有直接或间接支持非国家武装组织，没有直接或间接支持公共或私人安全部队，没有贿赂或掩盖矿产真实来源地，没有参与洗钱等高风险行为。

本审计年度签约的33家供应商签署了相关的承诺书，另外4家供应商发布的年度相关报告中承诺遵守OECD的要求，在供应链中不存在OECD列明的高风险行为。

When signing the contract with the suppliers of silver material, the business personnel should request them to obey following requirements: 1) Clearly state in the form of the contract terms that the raw material supply chain shall comply with the requirements of OECD; or 2) in accordance with the requirements of LBMA, Sign the *Letter of Undertaking*; or 3) ensure that the raw material supply chain complies with the OECD requirements by using any other written form. The business personnel need to ensure that all suppliers of silver material understand and comply with the management requirements, policies and required commitments of LBMA. Ensure that all suppliers of silver materials undertake in writing that there are no serious human rights violations related to mineral mining, transportation, or trade, no direct or indirect support to non-state armed organizations, no direct or indirect support to public or private security forces, no bribery or concealment of the true origin of minerals, and no participation in high-risk activities such as money laundering.



The 33 suppliers in the audit year have signed the relevant commitment letter, the other four issued the annual report commitment to comply with the OECD requirements and no high-risk behavior listed by OECD in the supply chain.

### **建立机密申诉机制 Establish a confidential grievance mechanism**

公司建立了申诉机制，合规小组的邮箱为 qiang.pen@nanfangmetal.com，并且申诉机制在含银物料采购过程中均向供应商进行了必要的沟通，内外部利益相关方可匿名举报有关白银交易过程中的违规行为。公司在审计监察部设立了专门的信访制度，作为内部员工的举报途径，同时公司制定了保护举报人、防止对举报人进行打击报复的制度，有效的保护了举报人权益。本审计年度没有举报事件发生。

A complaint mechanism has been established and the compliance team can be reached out to by writing an e-mail to the address of qiang.pen@nanfangmetal.com. In addition, the complaint mechanism has made necessary communication to suppliers in the procurement process of silver materials, and internal and external stakeholders can anonymously report the violations in the process of silver transaction.

The company has also established a special petition system in Audit Inspection Department, as way for internal employees to report, and the company has formulated a system to protect whistleblowers, prevent retaliation against whistleblowers, and effectively protect the rights and interests of whistleblowers. No incidents were reported during the audit year.

### **第2步：识别和评估供应链风险**

#### **Step 2: Identify and assess risks in the supply chain**

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合规声明

我们完全符合第二步：识别和评估供应链风险

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We have fully complied with step 2: Identify and assess risks in the supply chain.

### 供应链风险识别 **Identify risks in the supply chain**

合规陈述：Compliance statement:

《白银供应链尽职调查管理办法》中规定了供应商风险识别方法，涵盖了含银物料从原产地到精炼厂的所有风险，通过《供应商尽职调查表》识别如下风险，如供应商基本信息、受益人、原产地信息、负责的贵金属供应链政策、运输过程、反洗钱反资助恐怖主义、贿赂和欺诈、人权侵权行为、强迫劳动行为、交易监控、支持非政府武装组织等。

根据 LBMA 和 OECD 高风险供应链评判标准的相关规定，参照联合国安理会制裁文件、制裁名单(美国、英国、欧盟、联合国及相关制裁名单)、联合国人权事务高级专员办事处或同等机构、金融行动特别工作组 (FATF) 的报告、海德堡冲突晴雨表、透明国际清廉指数、多德-弗兰克法案第 1502 条、脆弱国家指数或类似的指数、关于高风险黄金中心/转运中心和高洗钱风险国家/地区的可靠市场情报、以及欧盟CAHRAS名单等，结合公司实际情况，特规定如下高风险白银供应链评判标准：

- 1) 矿产银或回收银来源于、中转或者运经冲突影响或侵犯人权高风险地区。
- 2) 矿产银声称来源于一个已知储量有限、资源有限或预计白银产量有限的国家。
- 3) 回收银来源于已知的冲突影响和侵犯人权的高风险地区，或者有理由怀疑经此地区中转过。
- 4) 在白银供应链中的企业或者其已知的上游企业位于一个有着洗钱、犯罪和贪污高风险的国家。
- 5) 在白银供应链中的企业或者其已知的上游企业的收益所有人是政治敏感人物。
- 6) 在白银供应链中的企业或者其已知的上游企业积极参与高风险商业活动，例如武器、赌博、赌业、古董和艺术品、宗教和宗教领袖。
- 7) 中国政府认定的其它高风险情况。



当上述评判标准任何一条客观存在时，则该白银供应链被判定为高风险供应链。部门合规专员应立即准备资料并上报合规组长，合规组长收集并整理好相关信息材料上报合规总监，由合规总监上报公司高管层并得到授权后审批该高风险供应链的风险级别，并在一定时间内实施所有强化尽职调查，并根据白银供应链风险减缓管理办法做出相应对策。

*The Silver Supply Chain Due Diligence Regulations* defines supplier risk identification methods, covering all risks of silver materials from origin to refineries. The *LBMA Questionnaire* identifies such risks as basic supplier information, beneficiary, origin information, responsible precious metal supply chain policy, transport process, anti-money laundering, anti-financing of terrorism, bribery and fraud, human rights violations, forced labor, transaction monitoring, support to armed non-governmental organizations, etc.

According to the relevant regulations of LBMA and OECD High Risk Supply Chain Criteria, with reference to the United Nations security council sanctions file , Sanction list(US, UK, EU, UN and related sanction lists),Office of the United Nations High Commissioner for Human Rights or equivalent agency,Report of the Financial Action Task Force(FATF) Report, Heidelberg conflict barometer,transparency international corruption perceptions index,Section 1502 of Dodd Frank Act, Fragile Country Index or similar index,Reliable market intelligence on high-risk gold centers/transfer centers and countries/regions with high money laundering risk,and the European Union CAHRAS list, etc., in combination with the practical situation of the company, The following high risk silver supply chain evaluation criteria are specified:

- 1) Mineral or recycled silver from, transit through or through areas of high risk of conflict-affected or human rights violations.
- 2) Mineral silver claims to originate from a country with limited known reserves, limited resources or limited expected silver production.
- 3) The recovered silver is derived from areas known to be at high risk of conflict



effects and human rights violations, or there is reason to suspect transit through such areas.

4) Enterprises in the silver supply chain or its known upstream enterprises are located in a country with a high risk of money laundering, crime and corruption.

5) Enterprises in the silver supply chain or its known upstream companies or its beneficial owners that have significant influence on it are politically sensitive person.

6) Enterprises in the silver supply chain or its known upstream businesses are actively participates in high-risk business activities such as weapons, gambling, antiques and art, religious and religious leaders.

7) Other high-risk situations identified by the Chinese government

When any of the above evaluation criteria exists objectively, the silver supply chain is judged as a high-risk supply chain. The Department Compliance Officer shall immediately prepare the information and report it to the Compliance Supervisor. Compliance Supervisor collects and organizes relevant information and materials to Compliance Director. Then the Compliance Director shall report to the company executives and obtain the approval of the risk level of the high-risk supply chain, implement all strengthened due diligence within a certain period of time, and make corresponding countermeasures according to the silver supply chain risk mitigation management measures.

### 供应链风险评估 **Risk assessment in the supply chain**

合规陈述： Compliance statement:

识别方法包括：1) 借助LBMA问卷调查表建立供应链客户档案，包括：企业名称、法定代表人、地址、联系方式、生产方式、营运方式、交易合同等；2) 借助供应链评估表对既有供应链客户定期进行核查评估，如有新建或变更的客户，需要及时对其档案进行更新，保持档案资料库处于最新状态；3) 使用政府司法公示平台以及第三方商业信息查询平台所提供的文件、数据或信息来验证其身份，识别每一客户、企业和企业收益所有人，确定供应链中每一客户、企业和企业收益所有





人不在任何政府的洗钱、诈骗或恐怖主义通缉名单上。定期获取供应链客户商业和财务方面的详细情况、从事白银交易目的及商业运作情况。

The identification method includes: 1) Establish the supply chain customer files with the help of the LBMA questionnaire, including: enterprise name, legal representative, address, contact information, production mode, operation mode, transaction contract, etc.; 2) Regularly check and evaluate the existing supply chain customers with the help of the LBMA supply chain assessment form. If there are new or changed customers, their files should be timely updated to keep the archives database up to date; 3) Uses the documents, data or information provided by the government judicial publicity platform and the third-party commercial information inquiry platform to verify its identity, identify every customer, enterprise and enterprise income owner, and determine that every customer, enterprise and enterprise income owner in the supply chain is not on any government's money laundering, fraud or terrorism wanted list. Regularly obtain details of commercial and financial aspects of supply chain customers, silver trading purposes and business operations of supply chain customers.

在与供应商建立业务关系之前，业务部门需要根据供应链风险识别的结果，对每一个供应商进行单独的风险评估，填写风险评估表，由相关合规专员签字，最终由合规总监批复。风险评估结果分两种，高风险和非高风险。

对于高风险供应商，我们将停止交易，封存该供应商所有产品并立即进行尽职调查：实地考察或参观高风险供应链，证实供应链尽职调查结果文件记录是否真实，调查结束后出具现场审计报告。

在报告审核年度，国内原料来源地为广西、云南和四川等地，国外主要来源地为南美、北美、澳大利亚以及及欧盟等地区。我们共计完成了33家矿产银供应商的尽职调查，其中24家供应商位于中国大陆，9家来自境外。另外，我们对所有中国大陆的供应商都进行了实地考察。根据风险评估结果，所有33家供应商均为低风险供应商。

对于来自存在高风险国别/地区的土耳其、玻利维亚、保加利亚的含银物料供应链，我们进行了附加强化尽职调查，包括收集了矿山员工的安全健康政策、道德



与商业行为规范、社会责任和环境保护等制度及ESG相关工作的开展情况，并进行了远程审核，没有发现高风险行为，经过合规总监审核判定以上供应链均为低风险。

Before establishing a business relationship with the supplier, the business department needs to conduct a separate risk assessment on each supplier according to the results of the supply chain risk identification, fill in the risk assessment form, signed by the relevant Compliance Officer, and finally approved by the Compliance Director. There are two kinds of risk assessment results, high risk and non-high risk.

For high-risk suppliers, we will stop trading, seal all products and conduct due diligence immediately. Field visit or visit the high-risk supply chain, verify whether the supply chain due diligence result documents are true, and issue the site audit report after the investigation.

During the audit year, the main sources of domestic raw materials for mineral silver procurement are from Guangxi, Yunnan and Sichuan province. The main foreign sources are from South America, North America, Australia and the European Union. We have completed the due diligence of 33 mineral silver suppliers, of which 24 are from domestic and 9 are outside of mainland China. In addition, we conducted site visits to all suppliers in mainland China. According to the results of risk assessment, all 33 suppliers are non-high-risk suppliers

For the supply chain of silver-containing materials from Turkey and Bolivia and Bulgaria with high risk countries/regions, we have conducted additional due diligence which contains ESG related works such as safety and health policy of mine employees, code of ethics and business conduct, social responsibility and environmental protection system. We also kept a remote audit and found no high-risk behavior. After an assessment by the Compliance Director, the suppliers from this region was determined to be low risk.

#### 交易监控 **Monitoring of transactions**





公司建立了交易监控控制程序，对白银供应链交易风险进行监督。进厂每一批原料都需供应商提供货运单据、重量信息、品位信息、发票、付款信息、原产地信息等文件。审计监察部根据实际到厂检测重量及品位对所提供的对应信息逐笔进行核实，财务部和原料供应部根据实际船运信息对货运单据及原产地进行核实，财务部对发票及付款信息进行核实，确保每个供应商所提供文件内容真实准确。如果出现不符合交易程序要求的情形，各部门合规专员需对这些交易进行审查，并向合规总监报告审查结果。本审计年度未出现不符合交易监控控制的情形。

Our company has established a transaction monitoring and control procedure to supervise the transaction risks of the silver supply chain. We require suppliers to provide documents for each parcel of raw materials, including waybill/bill of lading, weight information, assay information, invoice, payment information and origin information. The Audit and Inspection Department verifies the corresponding information provided one by one according to the actual tested weight and assay from our refinery. The Financial Management Department and Domestic Material Supply Department verifies the freight documents and origin according to the actual shipping information, and the Finance Department verifies the invoice and payment information to ensure that the contents of the documents provided by each supplier are true and accurate. In case of noncompliance with the transaction procedures, the department Compliance Officer need to review these transactions and report the results to the Compliance Director. There is no conformity to the transaction monitoring control in this audit year.

#### 附加保证声明 **Additional assurance statement**

公司所制定的《白银供应链尽职调查政策》以及《白银供应链尽职调查管理办法》均有专门条款明确规定，我司以及所有白银供应链上的公司不存在强迫劳动的情形。我司遵守与劳工权益保护相关的法律法规，包括但不限于《中华人民共和国劳动法》《中华人民共和国民法典》《中华人民共和国个人信息保护法》等，与所有员工均签订劳动合同，确保所有工作均为员工自愿，并向所有员工提供良好的福利待遇，相关声明请参见：



<https://www.nanfangmetal.com/content/?486.html>。同时向所有白银供应链上的公司宣贯这一要求，让其在所提供的承诺书中保证无强迫劳动的情形，并通过对供应商所在地的现场走访、对供应商员工进行调查访谈、审阅人权报告等确认无强迫劳动的情况。在此，可以负责任地声明我司以及所有白银供应链上的公司均无强迫劳动的情况。

Both the *Silver Supply Chain Due Diligence Policy* and the *Silver Supply Chain Due Diligence Management Measures* formulated by our company are clearly stipulated that our company and all of the companies in the silver supply chain have no forced labor situation. We abide by the laws and regulations related to the protection of labor rights and interests, including but not limited to *the labor law of the People's Republic of China, the civil code of the People's Republic of China, the personal information protection law of the People's Republic of China, etc.* We signed labor contracts with all employees to ensure that all work is voluntary and provide good welfare benefits to all of them, please refer to:

<https://www.nanfangmetal.com/content/?486.html> At the same time, all companies in the silver supply chain have been informed of this requirement, so that they can ensure that there is no forced labor in the letter of undertaking they provided. Through site visits, survey interviews with suppliers' employees and review of human rights reports we can also confirm that there is no forced labor in the supply chain. Here, we can declare responsibly that neither our company nor any of the companies in the silver supply chain have forced labor.

### 风险评估结果的汇报 **Report risk assessment to the designated manager**

#### 合规陈述: Compliance statement:

公司合规总监每年向公司高管层提交上一年度白银供应链尽职调查风险评估报告。公司的高管层对白银供应链有最终控制权和最高责任。高管层谨慎选择和监督合规总监，并给予其必要的职权以完成其职责。根据高管层授权，公司合规总监审批每一个被评为高风险的新的供应链，每年重新决定是否继续与之保持商务关系。



The company's compliance director submits an annual silver supply chain due diligence risk assessment report to the company's senior management. Company executives have the ultimate control and the highest responsibility for the silver supply chain. Senior executives carefully select and supervise compliance director and give him the necessary authority to perform his duties. Under executive authority, the company's compliance director approves each new supply chain rated as high risk and decides annually whether to continue business relations with it.

### 第3步：对已识别的风险实施管理策略

#### Step 3: Design and implement a management system to respond to the identified risks

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合规声明：Compliance statement:

我们完全符合第三步：设计和实施一项管理策略应对已识别的风险。

We have fully complied with step 3: design and implement a management strategy to address identified risks.

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制定已识别的风险实施一项风险管理策略 a strategy for risk management of an identified risk

合规陈述：Compliance statement:

在继续交易时缓解风险：当对供应商的评估处于低风险时，我司继续从该供应商获得银原料，在合作过程中逐步对其调查资料进行完善，并逐步协助供应商建立他们的尽职调查体系，帮助他们建立、完善风险管控中的不足。

在暂停交易时缓解风险：与低风险供应商合作时，发现可以的风险使该供应商可能变为中风险供应商，没有取得确定结果之前，暂停与该供应商合作，并调查可疑风险，直至确定该风险为低风险供应商，再依据结果进行处理。当评估结果为中风险时，需要暂停与该供应商的合作，同时隔离来料。在规定的期限内，供应商整改该风险项，解除风险，则恢复交易，如整改达不到要求或者无法解除风险，则最后停止与该供应商合作。



停止交易脱离风险：对供应商的评估为高风险，或者与供应商合作时发现高风险项目，则停止与其合作，将评估报告及高风险项汇报给最高管理层，由最高管理层批准停止该供应商资格。

对于来自土耳其、玻利维亚、保加利亚的含银物料，我们进行了附加强化尽职调查，确认该物料来自非高风险地区，运输也未途径高风险地区，且符合LBMA和OECD其他相关要求，最终评定为低风险供应链。

To mitigate risk while continuing trading: when the supplier's assessment is at low risk, we continue to obtain silver raw materials from the supplier, gradually improve its investigation data in the process of cooperation, and gradually assist suppliers to establish their due diligence system. Help them to establish and improve risk control deficiencies.

Mitigation of risk when suspending transactions: when working with a low-risk supplier, it is found that the possible risk causes the supplier to become a medium-risk supplier, suspend cooperation with the supplier without a definite result, and investigate the suspicious risk until the risk is identified as a low-risk supplier, and then deal with the result. When the assessment is medium risk, suspending cooperation with the supplier while isolating incoming materials. Within the specified time limit, the supplier corrects the risk item, if it removes the risk, we will resume the transaction, if the rectification fails to meet the requirements or cannot relieve the risk, we will finally stop cooperating with the supplier.

Stop transaction and break away risk: Evaluate the supplier as high risk, or find high risk items when cooperating with the supplier, we will stop cooperation with it, report the evaluation report and high risk items to the top management, and stop the supplier qualification approved by the top management.

For silver-containing materials from Turkey and Bolivia and Bulgaria, we conducted additional due diligence to confirm that the material originated from a non-high-risk area, was not transported through a high-risk area, and met other relevant LBMA and OECD requirements, and was ultimately assessed as a low-risk supply chain.



量化措施，绩效监督，重新评估以及定期汇报 **Measurable steps, monitoring of performance, periodic reassessment, regular reporting to designated senior management**

合规陈述：Compliance statement:

**量化手段和绩效评估：Quantitative tools and performance evaluation:**

根据《白银供应商风险缓解管理办法》，如果尽职调查的结果处于低风险，但仍存在轻微不符合时，只要该公司在规定的时间内采取了明确绩效目标的改进策略，我司将继续从其处获取白银原材料。如果白银供应链尽职调查提交的资料不完善，或者不愿意配合的，说明存在洗钱、恐怖主义融资、助长冲突、侵犯人权的行为可能性很高，我司将立即停止从其处获取白银原材料，直到其他信息或数据能够证明其低风险。

在报告审核年度内，除了评估所有供应商尽职调查资料外，我们还对所有中国大陆的供应商都进行了实地考察，并对其员工进行调查访谈，最终确认所有供应商均为低风险。

According to the *Silver Supply Chain Risk Mitigation Management Method*, if the results of due diligence are at low risk, but there is still a slight nonconformity, as long as that company has adopted a clear performance target improvement strategy within the specified time range, we will continue to obtain silver raw materials from it. If the due diligence submission of the silver supply chain is incomplete or unwilling to cooperate, there is a high risk of money laundering, terrorist financing, fueling conflict and human rights violations. We will immediately stop obtaining silver raw materials from them until other information or data can prove their low risk.

During the reporting audit year, in addition to reviewing all supplier due diligence data, we conducted site visits to all suppliers in mainland China and conducted survey interviews with their employees, all suppliers are low risk.

**定期重新评估与持续监控：Regular reassessment and continuous monitoring:**

每年原料采购部门收集供应商信息的所有变更情况，持续监控交易结果并进



行年度供应链尽职调查重新评估，以决定是否继续合作。采购的每一批次白银原料在运输、出入库、生产、付款过程都有公司内部流程监控。

The raw material purchasing department collects all changes in supplier information each year, continuously monitors transaction results and conducts annual supply chain due diligence reassessment to determine whether to continue to cooperate. Each batch of silver raw materials purchased is monitored by the company's internal process during transportation, warehousing, production and payment.

**定期报告：Periodic reports:**

财务部/原料供应部合规专员每年向合规总监提交一份评估报告，对本年度白银供应商尽职调查管理体系运行进行总结。合规总监审核完毕后向公司高管层汇报评估报告。

截止2024年12月31日，我们共计完成了所有33家供应商尽职调查文件的更新工作，并向合规总监提交评估报告，合规总监已审核评估报告并向高管层汇报。

The officer of Finance Department and Domestic Material Supply Department submit an annual assessment report to the Compliance Director to summarize the operation of the silver supplier due diligence management system for this year. After audit, the Compliance Director shall report it to the senior executive.

As of December 31, 2024, we have completed the updating of due diligence documents for all 33 suppliers and submitted a report to the Compliance Director, who has reviewed the report and reported it to the senior executives.

**第4步：安排独立的第三方审计**

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

**合规声明：Compliance statement:**

我们完全符合第四步：安排独立的第三方审计。

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We have fully complied with Part 4: Arrange for an independent third-party audit of the supply chain due diligence

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合规陈述： Compliance statement:

上一次审计时间为2024年3月，审计报告已经上传至公司官方网站 <https://www.nanfangmetal.com>。本报告审计期间我们将继续请必维认证（北京）有限公司进行监督审计，本年度的审计将参照ISAE3000的标准执行。

The last audit was in March 2024 and the audit report has been uploaded to the official website of our company <https://www.nanfangmetal.com>. This year we will continue to invite Bureau Veritas (Beijing) to supervise the audit, an audit for this year will be conducted in accordance with the ISAE3000 standards.

**第5步：供应链尽职调查报告**

**Step 5: Report on supply chain due diligence**

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合规声明： Compliance statement:

我们完全符合第五步：供应链尽职调查报告。

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

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合规陈述： Compliance statement:

我们的白银供应链政策中列出了有关如何实施供应链尽职调查政策、程序、过程和控制，以符合LBMA负责任白银指南中特定要求的更多信息和具体细节，该政策及报告可在如下公司网站上查阅：

<https://www.nanfangmetal.com>





Our silver supply chain policy lists additional information and specific details on how to implement supply chain due diligence policies, procedures, processes and controls to meet the specific requirements in the *LBMA Responsible Silver Guidance*, which together with our report can be found on the company websites as follows:

<https://www.nanfangmetal.com>

#### 第四部分 **Part IV**

#### 结论 **Conclusion**

##### 管理层结论 **Management conclusion**

我司在截止2024年12月31日的年度报告中，实施了有效的管理系统、程序、流程和时间，以符合LBMA负责任白银指南所规定的要求。

我们致力于持续改进，并将定期对内部发现的所有纠正措施进行监控。持续满足LBMA负责任白银指南的要求。

We implemented effective management systems, procedures, processes and time in our annual report as of December 31, 2024 to meet the requirements of the *LBMA Responsible Silver Guidance*.

We are committed to continuous improvement and will regularly monitor all corrective actions found internally. Continuously meet the requirements of the *LBMA Responsible Silver Guidance*.

##### 其他 **Other report comments**

如果相关方对我司《合规报告》有异议或者有建议需反馈，请通过电子邮件 [qiang.pen@nanfangmetal.com](mailto:qiang.pen@nanfangmetal.com) 联系我们。

If the parties have any objection to our Compliance Report or any suggestions for feedback, please contact us by email with the address [qiang.pen@nanfangmetal.com](mailto:qiang.pen@nanfangmetal.com).