

紫金铜业有限公司
白银供应链尽职调查合规报告
(2024 年)

Zijin Copper
Compliance Report on
Silver Supply Chain Due Diligence
(2024)

2025 年 3 月 30 日
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目录

Content

一、公司简介	1
I. Company Profile	1
二、合规性概述	3
II. Compliance Overview	3
第一步：建立强有力的公司管理体系	3
Step 1: Establish strong company management systems	3
第二步：识别并评估供应链中的风险	14
Step 2: Identify and assess risk in the supply chain	154
第三步：设计和实施应对已识别风险的策略	263
Step 3: Design and implement a management strategy to respond to identified risks	263
第四步：安排对供应链的尽职调查进行独立第三方审计	26
Step 4: Conduct an independent third-party audit of the Supply Chain due diligence	26
第五步：每年报告一次供应链尽职调查	27
Step 5: Report on supply chain due diligence annually	27
三、管理结论	27
III. Management Conclusion	27
四、其他	28
IV. Miscellaneous	28

<div>公司名称</div> <div>Company Name</div>	紫金铜业有限公司 Zijin Copper Co., Ltd.
<div>位置</div> <div>Location</div>	中国福建省龙岩市上杭县蛟洋工业园区 Jiaoyang Industrial Park, Shanghang County, Longyan City, Fujian Province, China
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<div>报告负责人</div> <div>Person Responsible for this Report</div>	陈延进总经理 General Manager Chen Yanjin

一、公司简介

I. Company Profile

紫金铜业有限公司坐落于上杭县蛟洋工业区，由 2024 年《福布斯》全球上市 2000 强第 267 位的紫金矿业集团股份有限公司投资建设，2011 年底建成，总投资近百亿元，在省、市、县各级各部门的关心指导与大力支持下，公司现已形成年产 40 万吨阴极铜、18 吨黄金、400 吨白银、100 万吨硫酸生产规模，同时副产硒、碲、铂、钯、铑等半导体、集成电路所需的稀贵金属，年产值 300 亿元以上。公司通过 GB/T19001-2016/

ISO9001:2015、GB/T24001-2016/ISO14001:2015、ISO45001:2018、ISO50001:2018 /RB/T117-2014、GB/T19022-2003/ISO10012:2003 质量、环境、职业健康安全、能源管理、测量体系认证，认证涵盖阴极铜、工业硫酸、贵金属（黄金、白银）的生产和服务，表明公司在质量、环境、职业健康安全、能源和测量管理等方面符合上述体系标准的要求。

Located in Jiao Yang Industrial Zone, Shanghang County, Zijin Copper is invested and built by Zijin Mining Group Co., Ltd. which is ranked 267 in the Forbes Global 2000 listings in 2024. Zijin Copper was completed at the end of 2011, with a total investment of nearly 10 billion yuan. Under the care and guidance and strong support from various departments at all levels in the province, city and county, the company has now formed an annual output of 400,000 tons of copper cathode, 18 tons of gold, 400 tons of silver and 1 million tons of sulfuric acid production scale, while producing selenium, tellurium, platinum,

palladium, rhodium and other rare precious metals required for semiconductors and integrated circuits, with an annual output value of more than 30 billion yuan. The Company has passed the authentication of GB/T19001-2016/ISO9001:2015, GB/T24001-2016/ISO14001:2015, ISO45001:2018, ISO50001:2018/RB/T117-2014, GB/T19022-2003/ISO10012:2003 for quality, environment, occupational health&safety, energy, and measurement management systems, which covers the production and service of cathode copper, industrial sulfuric acid and precious metals (gold and silver) to demonstrate that the Company has met all the requirements of the above system standards.

公司是上海黄金交易所可提供标准银锭企业和上海期货交易所银锭品牌注册企业，连续多年被上海黄金交易所评为“可提供标准银锭企业先进单位”。公司于2016年申请白银伦敦金银市场协会（LBMA）注册，并于2017年8月3日获得注册证书，成为LBMA合格的交割白银精炼厂之一。

The Company is approved by Shanghai Gold Exchange to provide standard silver bars and is the enterprise with silver bar brand registration at Shanghai Futures Exchange, while has been appraised as "Advanced Unit of Standard Silver Bar Enterprise" for years. The Company submitted application for LBMA (London Bullion Market Association) Good Delivery status in 2016 and become one of the LBMA Silver Good Delivery refiners on 3rd August, 2017.

根据LBMA发布的《LBMA负责任白银指南》的要求，集团董

事会下设战略与可持续发展（ESG）委员会，统筹制定白银供应链尽职调查的顶层设计，确保人权保护、反洗钱（AML）及供应链透明度等核心议题纳入集团战略。作为集团核心成员企业，我司严格遵循集团垂直管理体系，通过市场部、技术质量中心、熔炼厂、稀有厂等关键部门构建全流程合规闭环。本报告总结了截至 2024 年 12 月 31 日公司遵守 LBMA 责任白银指南的情况。

In accordance with the requirements of the *LBMA Responsible Silver Guidelines* issued by the LBMA, the Strategy and Sustainability (ESG) Committee has been set up under the Board of Directors of the Group to co-ordinate and formulate the top-level design of the due diligence of the silver supply chain, and to ensure that core issues such as the protection of human rights, anti-money laundering (AML) and transparency of the supply chain are incorporated into the Group's strategy. As a core member of the Group, the Company strictly follow the Group's vertical management system and build a closed loop of full-process compliance through key departments such as the Marketing Department, Technical Quality Center, Smelting Plant and Rare Precious Plant. This report summarized the compliance of Zijin Copper Co., Ltd. with *LBMA Responsible Silver Guidance* as of 31st December, 2024.

二、合规性概述

II. Compliance Overview

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

The Company conducts supply chain due diligence for all suppliers, and requires their silver to be legal and compliant.

第一步：建立强有力的公司管理体系

Step 1: Establish strong company management systems

合规声明与要求：截至 2024 年 12 月 31 日止，公司已经全部遵守第 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。

Compliance Statement and Requirement: As of 31st December, 2024, the Company has fully complied with the requirements of Step 1 and has established a strong company management system to ensure the implementation of silver supply chain due diligence.

1.1 发布有关的白银供应链的尽职调查政策

1.1 Release of due diligence policy regarding silver supply chains

根据《LBMA 负责任白银指南》第 1.1 步所有威胁性融资风险和《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》（以下简称“《经合组织尽职调查指南》”）附件二所列的风险的要求，公司于 2024 年 11 月根据《LBMA 负责任白银指南》（第二版）修订发布了《紫金铜业有限公司白银供应链尽职调查政策声明》（以下简称“《政策声明》”）和《紫金铜业有限公司白银供应链尽职调查管理办法》（以下简称“《管理办法》”），承诺公司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。

In accordance with the requirements of Step 1.1 of the *LBMA Responsible Silver Guidance* for all threat financing risks and the risks listed in Annex II of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (hereinafter referred to as the "*OECD Due Diligence Guidance*"), the Company approved and issued the *Statement on Due Diligence Policy for Silver Supply Chain of Zijin Copper Co., Ltd.* (hereinafter referred to as the "*The Policy Statement*") and *Management Measures for Due Diligence for Silver Supply Chain of Zijin Copper Co., Ltd.* (hereinafter referred to as the "*The Management Measures*") in November 2024, in which the Company committed to strictly abide by national laws and regulations on employee rights, environmental protection, fair trade, etc., actively participate in the due diligence work of silver supply chain, and hold a zero tolerance attitude towards "massive human rights abuses", "acts directly or indirectly supported by non-government armed groups" and "demands for bribes or kickbacks from individuals (including government officials, customers, and suppliers or any other organizations)" in the process of silver production and trade.

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

The Management Measures covers the scope of application, organizational structure and responsibilities, collection of supplier and customer information, identification and assessment of supply chain risks, monitoring of supply chain transactions, record file management, training, and communication, etc., which sets out the Company's responsibilities for conducting risk-based due diligence, transaction screening and monitoring, and the current governance structure.

合规小组每年审查一次公司的《政策声明》和《管理办法》，在情况需要时进行更新，在公司官网（<http://www.zijinty.com>）及时更新发布中英文版，并将其传达给所有相关员工。

The Compliance Investigation Team reviews *the Policies Statement* and *the Management Measures* once a year, and will be updated when the situation requires. It will be published on the Company's official website (<http://www.zijinty.com>) in English and Chinese promptly and conveyed to all relevant employees.

1.2 组建尽职调查的内部管理组织机构

1.2 Set up an internal management structure to support supply chain due diligence

公司专门为白银供应链尽职调查设立了以总经理为董事，公司分管市场部副总经理、公司监事会主席、副总经理组成的合规委员会，设置了由市场部负责人担任的合规专员，成立了合规小组，小组成员由市场部、计划财务部、总调度室、稀贵厂、熔炼厂、电解厂、技术质量中心、监察审计部等指派。总经理陈延进先生具有多年的管理工作经验，曾多次被评为企业优秀经理人、优秀企业家等

荣誉称号，负责对白银供应链负责任采购管理体系建设提供充足的人力、资金等资源。合规专员谢翠珍女士熟知负责任供应链政策，有多年的国内外原料采购经验，负责原料供应商选择审核，执行供应链的尽职调查流程。

The Company has set up a Compliance Investigation Team for the silver supply chain due diligence, including Mr. Chen Yanjin, General Manager of the Company (as the Team Leader), Mr. Lin Zhijian, Vice General Manager of the Company (as the Deputy Team Leader), Mr. Jiang Farong, Manager of the Marketing Department (as the Compliance Specialist), and team members assigned by the Marketing Department, Planning and Finance Department, General Dispatch Office, Rare Precious Metal Plant, Melting Plant, Electrolysis Plant, Technology and Quality Center, and Supervision and Audit Office. With many years of management experience, Mr. Chen Yanjin, who has been honored as an excellent manager and an excellent entrepreneur for many times, is in charge of providing sufficient human and financial resources for the construction of the responsible procurement management system of the silver supply chain. Ms. Xie Cuizhen, the Compliance Specialist who has many years of experience in domestic and international raw material procurement and is familiar with the responsible supply chain policy, is in charge of the selection and audit of raw material suppliers and the implementation of the supply chain due diligence process.

公司每年将供应链尽职调查管理、LBMA 负责任的白银指南培训纳入公司年度培训计划当中，通过公司网站、手机微信群、交流以

及会议等方式，必要时外聘老师进行授课，组织公司合规小组成员以及供应商进行培训，培训内容包括《LBMA 负责的白银指南》（第二版）《LBMA 负责的采购披露指南》《经合组织尽职调查指南》，以及对供应链风险评估工具：如相关制裁名单、多德—弗兰克法案、欧盟 CAHRA 名单、海德堡晴雨表、脆弱国家指数或类似的指数、金融行动特别工作组（FATF）的报告，确保公司相关岗位以及合规小组成员熟悉《管理办法》和《LBMA 负责任白银指南》。2024 年公司组织了两场 32 人次的内部员工培训。

The Company has taken training on the management of due diligence for the supply chain and the LBMA Responsible Silver Guidance as part of the Company annual training plan, organizing training for members of the Company's Compliance Team and suppliers through the Company's website, WeChat groups, communication and conferences, as well as lectures by external instructors when necessary. The training includes the *LBMA Responsible Silver Guidance*, *LBMA Responsible Sourcing Disclosure Guidance*, *OECD Due Diligence Guidance*, as well as training on supply chain risk assessment tools such as relevant sanctions lists, the Dodd-Frank Act, the EU CAHRA List, the Global Conflict Barometer, the Fragile States Index or similar index, and reports from the Financial Action Task Force (FATF), which ensured that relevant positions in the Company and members of the Compliance Team are familiar with *The Management Measures* and the *LBMA Responsible Silver Guidance*. In 2024, two internal staff training sessions with 32 participants were organized.

公司通过会议、邮件等方式对严重违反《政策声明》及尽职调查流程的人员实施内部考核机制。

The Company implemented internal assessment mechanisms through meetings and emails for serious violations against *the Policies Statement* and due diligence process.

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，通过公司基本账户所在的银行网上付款，并打印银行回单作为凭证附件保留至少 5 年。

Upon payment of goods, the Business Department initiates the co-signing procedure for funding matters, and the payment is made online through the bank where the Company's basic account is located after approval, with bank receipts printed and retained as voucher attachments for at least 5 years.

公司保存供应商营业执照、采矿证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、结算单等相关记录资料，并且保存 5 年以上。

The Company maintains copies of suppliers' business licenses, mining certificates and other qualification verification information, and other relevant record information such as supplier due diligence forms, each batch of weighing sheets, original records of moisture determination, original records of inspection, inspection reports, and statements for over 5 years.

2024 年 9 月 3 日，合规调查小组召开会议，讨论了公司尽职调查政策及 2024 年年度对供应商尽职调查活动开展情况，合规小组成

员参加了本次会议。

On 3th September, 2024, the Compliance Investigation Team held a meeting to discuss the Company's due diligence policy and the implementation of supplier due diligence activities in 2024. Members of the Compliance Team participated in this meeting.

1.3 建立内部供应链追溯体系

1.3 Establish an internal supply chain traceability system

1.3.1 供应链追溯体系

1.3.1 Supply Chain Traceability System

所有的供应商都会被进行资信调查，资信调查通过后签订合同以及供应商合规声明，承诺原料合法，符合 LBMA 尽职调查政策；对供应商供应的每一批原料都进行验收，验收项目包括重量、水分、品位等，重量验收有过磅单，水分验收有水分测定原始记录，品位验收有检测报告，过磅单、水分测定原始记录由验收人员和供应商（必要时）签字确认，最终以验收报告形式发给供应商；原料按批次进出库，形成进出库台账；生产过程取样化验，最后生产白银产品，打印唯一编号，通过上海黄金交易所或白银客户进行交易，并建立每批白银产品装运第一个目的地台账。

All will be investigated for credit. When suppliers pass the credit investigation, they will sign the contract and the supplier's Compliance Statement, promising that the raw materials are legal and comply with the LBMA due diligence policy. Each batch of raw materials supplied by the supplier will be checked before accepted. The checking list includes weight, moisture rate, grade, etc. There are weighing sheets for weight

check, original moisture measurement records for moisture check, and test reports for grade check. The weighing sheets and original moisture measurement records should be signed and confirmed by the inspector and the supplier (if necessary), and would be sent to the supplier in the form of acceptance report. During the production process, samples are taken for testing. Finally, silver bar products are printed with unique serial number, and traded through the Shanghai Gold Exchange or silver customers.

1.3.2 记录保存

1.3.2 Record keeping

公司保存供应商营业执照、采矿证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、结算单等相关记录资料，并且保存 5 年以上。

The Company keeps copies of the supplier's business license, mining license, and other qualification certificates, and also keeps the supplier's due diligence form, each batch of weighing sheets, original moisture measurement records, original test records, test reports, statements and other relevant records for more than 5 years.

1.3.4 合规专员

1.3.4 Compliance Officer

公司指定市场部主要负责人为合规专员，负责有关供应链尽职调查管理的所有事项，特别是对供应链尽职调查进行审核，并评估尽职调查是否充分，必要时收集额外文件或信息，确保在高风险供应链或交易采取相应措施。负责有关责任供应链的员工培训，编制

并更新供应链政策，并向合规委员会提供用于履行职责的适当信息。

The Company designates the main director of the Marketing Department as a Compliance Officer to be responsible for all matters related to supply chain due diligence management, especially the audit of supply chain due diligence, and the assessment of whether the due diligence is sufficient. Meanwhile, the Compliance Officer collects additional documents or information when necessary so as to ensure the implementation of corresponding measures in high-risk supply chains or transactions. The Compliance officer is also responsible for staff training related to the responsible supply chain, preparation and update of supply chain policies, and providing Compliance Committee with appropriate information for carrying out their duties.

1.4 加强与白银供应商的接触交流

1.4 Strengthen company engagement with silver-supplying counterparties

公司市场部原料采购科负责按照《管理办法》与原料供应商进行沟通。通过沟通，使其及时了解 LBMA 负责任的白银供应政策，以及公司《政策声明》，并告诫供应商需遵循相关政策及程序。通过充分沟通对供应商进行风险评估，避免与高风险供应商进行合作，若评估为低风险，则由合规专员签字确认后汇报合规委员会审批；若评估为高风险，合规专员签字确认后由合规委员会审批。

The Raw Material Procurement Division of the Company Marketing Department is responsible for the communication with external suppliers as per the *Management Measures*. Through which the

Company enables external suppliers to be aware of LBMA responsible silver supply policy and Zijin Copper's *the Policies Statement* in a timely manner, and warns them to follow relevant policies and procedures. The risk assessment of suppliers is carried out through full communication to avoid establishing cooperation with high-risk suppliers. If the supplier is assessed as a low-risk supplier, it shall be signed by the Compliance Officer for confirmation and then approved by the Compliance Committee. If the supplier is assessed as a high-risk supplier, it shall be signed by the Compliance Officer and approved by the Compliance Committee.

在与供应商合作之前，原料采购科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。该声明指出，卖方提供的所有原料应符合 LBMA 白银责任指南，避免冲突区域和高风险区域开采、处理进出口金属产品、滥用人权、融资非政府武装实体、违法犯罪团伙、贿赂、欺诈、洗钱等。

Before cooperation, the Raw Material Procurement Division would require them to sign a compliance declaration to ensure that they are aware of and comply with *LBMA Responsible Silver Guidance*, as well as the Company's silver supply chain policies and requirements, so as to reduce cooperation risks. In the declaration, it is pointed out that all raw materials provided by suppliers should comply with *LBMA Responsible Silver Guidance*, to avoid mining and handling import and export of

metal products in conflict-affected and high-risk areas, human rights abuse, financing to non-governmental armed entities and illegal criminal groups, bribery, fraud, money laundering, etc. The declaration indicates that all raw materials provided by the seller shall comply with the *LBMA Responsibility Silver Guidance*, avoiding mining in conflict and high-risk areas, handling the import and export of metal products, human rights abuses, financing non-governmental armed entities, criminal gangs, bribery, fraud, money laundering, etc.

公司遵守 EITI 的相关政策如《采掘业透明度行动计划》。

The Company complies with the relevant policies of EITI', such as the *Extractive Industries Transparency Initiative*.

1.5 建立机密申诉机制

1.5 Establish a confidential grievance mechanism

公司已建立相关申诉机制，内外部可获取匿名申诉。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，凡对政策有疑问或者发现违规行为的可以通过电话、微信、电子邮箱等方式进行反馈。公司尽职调查政策电话、微信、电子邮箱均在公司外网发布，公司员工及供应商均可以通过网络了解这些信息。

The company has established a relevant appeal mechanism, and anonymous appeals can be submitted internally or externally. In the due diligence management of the Company, the silver supply chain management reporting mechanism and channels have been provided. Any question about the policies or reporting of violations can be feedback by phone, Wechat, email, etc. The Company's due diligence

policy, telephone number, Wechat account, and email address have been released on the official website so that all employees and external suppliers could learn about such information online.

2024 年公司实现 LBMA 认证“零投诉”，共受理审计类投诉 2 起，相关部门已按规定进行办理，并及时将办理结果反馈给投诉人，均获得投诉人满意答复。

In 2024, the company achieved "zero complaints" in LBMA certification. A total of 2 audit-related complaints were received. The relevant departments handled them in accordance with regulations and promptly fed back the handling results to the complainants, all of which received satisfactory responses from the complainants.

第二步：识别并评估供应链中的风险

Step 2: Identify and assess risk in the supply chain

合规声明与要求：截至 2024 年 12 月 31 日，公司部分遵守第 2 步：识别并评估供应链中的风险，后续通过采取措施，并关闭了不符合项内容。

Compliance Statement and Requirement: The Company has partially complied with the requirements of step 2 as of 31st December, 2024. Subsequently, it has taken measures and closed the contents of non conformities.

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。

The Company strictly complies the requirements of *LBMA*

Responsible Silver Guidance STEP 2 "Identification and assessment of risks in supply chain" and has developed judgement criteria for high-risk supply chain, stipulates process procedures for identified risks to achieve fully identification and assessment of potential risks in supply chains.

2.1 识别白银供应链中的风险

2.1 Identify Risks in the Silver Supply Chain

公司白银来源于铜精矿、粗铜、阳极泥等原料，根据《经合组织尽职调查指南》公司识别相关风险，密切关注来自侵犯人权、武装冲突，以及用于、洗钱、恐怖主义融资等行为的白银。

The Company's silver comes from copper concentrate, crude copper, anode slime, and other raw materials. According to *the OECD Due Diligence Guidance*, the Company identifies relevant risks and pays close attention to the silver from areas with human rights violations, armed conflicts, as well as the silver used for bribery, money laundering, terrorist financing and other unexpected actions.

公司通过以下措施对供应链开展尽职调查：

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

2.1.1 供应商信息收集

2.1.1 Collection of suppliers' information

在与供应商合作之前，市场部负责收集国内供应商信息和问卷调查等资料，委托紫金国际贸易有限公司负责收集国外进口原料的供应商信息和问卷调查等资料。对于国内金银精矿和铜精矿、粗铜等白银原材料供应商，我们均要求其提供营业执照、采矿许可证等，

对其合法性进行证明；对国外进口原料的供应商，我们要求其提供相关的合法性经营证明。市场部还对供应商进行合规性调查，分别向供应商发送问卷调查，以获取相关信息和文件，包括供应商的基本信息、业务活动、管理结构、财务细节和负责责任的白银供应链等。

Before cooperation, the Marketing Department is responsible for collecting the information and data of domestic suppliers, and Zijin International Trade Co., Ltd. is entrusted to collect the information and data of suppliers of imported raw materials. For the domestic mined silver suppliers such as gold and silver concentrate, copper concentrate and crude copper suppliers, we have requested them to provide business license, tax registration certificate, organization code certificate, mining license, etc. to prove their validity. For the abroad suppliers of raw materials, we have required them to provide relevant legal business certificates. The Marketing Department has also conducted compliance investigations on suppliers by sending questionnaires respectively, to obtain relevant information and documents, including their basic information, business activities, management structure, financial details, and responsible silver supply chain.

2.1.2 供应商风险识别

2.1.2 Risk identification for suppliers

根据供应商提供的相关资料及问卷调查结果反馈，市场部开展白银供应链风险识别工作。在风险识别过程中，重点关注供应商是否存在洗钱、恐怖主义融资、侵犯人权、滥用劳工等风险事件。

Based on the relevant information provided by suppliers and the

questionnaire feedback, the Marketing Department carries out the risk identification of the silver supply chain. In the process of risk identification, focus on whether there are money laundering, terrorist financing, human rights violations, labor abuse and other risk incidents.

2.1.3 供应商风险评估，建立供应商档案

2.1.3 Risk assessment for suppliers and supplier files establishment

公司白银供应链风险评估包括位置风险、供应商风险和物料风险三个方面。在进行交易之前，市场部需要对供应商进行风险评估。位置风险包括含银物料来源于或曾运输经过受战争影响或人权遭受侵犯的地区（如需风险较大地区或人权遭受侵犯的地区的详细信息，参考相关制裁名单、多德一弗兰克法案、欧盟 CAHRA 名单、海德堡晴雨表、脆弱国家指数或类似的指数、金融行动特别工作组 (FATF) 的报告）；供应商风险包括：供应商或其上游公司有参与洗钱、犯罪、腐败或其他风险较高的事宜；供应商、供应商上游公司或受益所有人作为政治性公众人物；供应商或其上游公司积极从事高风险商业活动；物料风险主要关注手工和小规模开采矿（ASM）还是大规模开采矿（LSM）。

The risk evaluation of the Company's silver supply chain includes three aspects: location, supplier, and material. The Marketing Department is required to conduct a risk evaluation of the supplier before conducting a transaction. Location risks include silver-containing materials originating from or having been transported through areas affected by war or where human rights have been violated (for detailed

information on high-risk areas or areas where human rights have been violated, please refer to relevant sanctions lists, the Dodd-Frank Act, the EU CAHRA List, the Global Conflict Barometer, the Fragile States Index or similar index, and reports from the Financial Action Task Force (FATF). Supplier risks include: the supplier or its upstream company is involved in money laundering, crime, corruption, or other high-risk matters; the supplier, upstream company of the supplier, or the beneficial owner are political public figures; the supplier or its upstream company actively engages in high-risk commercial activities; the main focus of material risk is on artisanal and small-scale mining (ASM) or large-scale mining (LSM).

2. 评估供应链风险

2. Assess risk in the supply chain

2.2 高风险供应链

2.2 High Risk Supply Chains

2.2.1 高风险供应链标准

2.2.1 High Risk Supply Chain Standard

公司负责白银供应链的风险评估包括位置风险、供应商风险和物料风险三个方面。进行交易之前，采购部门需要对供应商进行风险评估。

The risk evaluation of the Company's silver supply chain includes three aspects: location, supplier, and material. The Marketing Department is required to conduct a risk evaluation of the supplier before conducting a transaction.

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

（1）原料银来源于、中转或者运经冲突影响或侵犯人权高风险地区，或被国际制裁地区。

（2）原料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，或者来源于世界遗产地的。

（3）原料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的。

（4）在白银供应链中的公司或者其他已知的上游公司位于一个有着洗钱、犯罪和贪污高风险的国家。

（5）在白银供应链中的公司或其他已知的上游公司的收益所有人是政治敏感人物、政府通缉的洗钱者名单或已知的诈骗犯或恐怖分子名单。

（6）在白银供应链中的公司或其他已知的上游公司积极参与高风险商业活动，例如军火、赌博、赌业、古董和艺术品、钻石，宗教和宗教领袖。

（7）采购自 ASM、使用汞生产和造成灾难性伤害或高度不利的 ESG 因素。

当上述评判标准任何一条客观存在时，则该供应链被判定为高风险供应链。部门合规小组成员应立即准备材料上报合规专员，由合规专员视情况上报合规委员会，由合规委员会批准采取应对措施，停止交易，强化尽职调查，消除风险。

2024 年度零容忍供应商数量为 0，高风险供应商数量为 9 家。为降低风险，公司对其进行了强化尽职调查，结果显示可以继续进

行合作。

According to the relevant regulations of LBMA and OECD, combined with the actual situation of the Company, the following assessment criteria for high-risk supply chain are specified:

(1) The mined silver originates from, has transited or has been transported via a conflict-affected or human rights abuse high-risk area, or areas under international sanctions.

(2) The mined silver is claimed to be originated from a country that has limited known reserves, likely resources or expected production levels of silver, or from a World Heritage Site.

(3) The mined silver originates from places where conflict-affected and human rights abuse high-risk areas are known, or reasonably suspected, to transit.

(4) Silver-supplying counterparty or other known upstream companies are located in a country representing high-risk for money laundering, crime and corruption.

(5) Silver-supplying counterparty or other known upstream companies or their beneficial owners with significant influence over the Silver-supplying counterparty are PEPs, on the government's wanted list for money launderers, or on the known lists of fraudsters or terrorists.

(6) Silver-supplying counterparty or other known upstream companies are active in a higher-risk business activity such as arms, gaming and casino industry, antiques and art, sects and their leaders.

(7) Procurement from artisanal and small-scale miners (ASM), use of mercury in production, and causing catastrophic harm or highly adverse environmental, social and governance (ESG) factors.

When any one of the above criteria is objectively present, the supply chain is assessed as a high-risk supply chain. The team should prepare documents immediately and report them to the Compliance Officer, who will then report these materials to the Compliance Committee, who shall approve and take countermeasures to stop the transaction, strengthen due diligence, and eliminate risks.

In 2024, the number of zero-tolerance suppliers is 0, and the number of high-risk suppliers is 9. To reduce risks, the Company has conducted enhanced due diligence on them, and the results show that cooperation can continue.

2.2.2 交易监测

2.2.2 Monitoring of transactions

国内原料主要来自福建、广东、江西、西藏、黑龙江等地。公司每年安排对所有交易情况进行监督，确保交易与供应链调查一致。

公司对供应链尽职调查进行检查，每批原料编号唯一，对于所有的原料采购入库均保留完整的单据资料，对于入库的铜精矿、金精矿保存有过磅单、水分测定记录、品位检测报告、结算单、财务凭证等。明确各个部门应在日常工作中收集保存的资料，由市场部、物流公司、技术质量中心、总调度室、财务部对相关单据进行保存，并定期将相关资料送至档案室进行存档，保存期限不少于 5 年。

Domestic materials are mainly from Fujian, Guangdong, Jiangxi, Tibet, and Heilongjiang, etc. The Company monitors all transactions to ensure that transactions are consistent with supply chain investigations.

The company conducts due diligence inspections on the supply chain. Each batch of raw materials has a unique serial number. It retains complete data for all purchased and stored raw materials. For copper concentrates and gold concentrates which are put into storage, their documents including weighing sheets, moisture measurement records, grade test reports, statement of account, financial vouchers, etc., are kept. Clarify the data that each department should collect and keep in daily work. The Marketing Department, Logistics Procurement Department, Technical Quality Center, General Control Center and Planning and Finance Department, are responsible for the relevant data preservation and required to regularly send the relevant documents to the archives room for filing. The retention period should be no less than 5 years.

2.2.3 向高级管理层报告风险评估

2.2.3 Report risk assessment to designated Senior Management

公司建立风险评估报告制度，每月合规专员视情况对部门尽职调查工作上报合规委员会。当供应链调查发现来自高风险区域，被评估为高风险供应链时，停止该交易并上报合规委员会审批。

The Company establishes a risk assessment reporting system, which requires the Compliance Officer to report the department due diligence to the compliance Team Leader every month. When the supply chain is found to be from a high-risk region after investigation and is assessed as

a high-risk supply chain, the transaction is stopped and reported to the Compliance Committee for approval.

2.3 针对高风险供应链采取强化尽职调查措施

2.3 Enhance due diligence measures for high-risk supply chains

经评估，供应商如果存在上述风险事件，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强化尽职调查，强化尽职调查的程序包括实地考察、对尽职调查结果进一步核实等，在高风险事件没有解除之前，公司不会与其建立任何合作关系，在经确认不存在此类高风险事件后，公司才会与之开展正常的合作。

If the supplier is found having any of the above-mentioned risk event during the assessment, the Company would define it as a high-risk supplier. For high-risk suppliers, the Company's due diligence investigation team would conduct a review on the supplier. The review procedures include on-site investigation and further verification of the due diligence results, etc. The Company would not establish any cooperation with the high-risk supplier until its high-risk events are addressed. Only after it is confirmed that there is no such high-risk event can the company carry out normal cooperation with it.

2.3 零容忍供应链

2.3 Zero-tolerance Supply Chains

2.3.1 零容忍供应链标准

2.3.1 Zero-tolerance Supply Chain Standard

根据 LBMA 和 OECD 相关规定，结合公司实际情况，特规定如下零容忍供应链评判标准：

（1）原材料银来源于被指定为世界遗产地的地区并且未被提供明确授权。

（2）在白银供应链中的公司或其他已知的上游公司以违反国际制裁（包括但不吸纳与联合国、欧盟、英国和美国制裁）的方式采购开采银或再生银。

（3）在白银供应链中的公司或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。

当上述评判标准任何一条客观存在时，则该供应链被判定为零容忍供应链。合规小组成员应立即准备材料上报合规专员，由合规专员汇报合规委员会，由合规委员会批准采取应对措施，停止交易，强化尽职调查，消除风险。

According to the relevant regulations of LBMA and OECD, combined with the actual situation of the Company, the following assessment criteria for zero-tolerance supply chain are specified:

(1) The raw material silver is sourced from areas designated as World Heritage Sites without clear authorization being provided.

(2) Companies in the silver supply chain or other known upstream companies purchase mined silver or recycled silver in a manner that violates international sanctions (including but not limited to those imposed by the United Nations, the European Union, the United Kingdom, and the United States).

(3) Companies in the silver supply chain or other known upstream companies or their Ultimate Beneficial Owners (UBOs) are known money launderers, fraudsters, or terrorists, or have seriously violated human rights, or directly or indirectly supported illegal non-state armed groups.

When any one of the above criteria exists, the supply chain is assessed as a zero-tolerance supply chain. Members of the departmental compliance investigation team should prepare documents immediately and report them to the Compliance Officer, who will then report these materials to the Compliance Committee, and the Compliance Committee shall approve and take countermeasures to stop the transaction, strengthen due diligence, and eliminate risks.

第三步：设计和实施应对已识别风险的策略

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

合规声明与要求：截至 2024 年 12 月 31 日，公司完全遵守了步骤 3：设计和实施风险管理策略。

Compliance Statement and Requirement: The Company has fully complied with Step 3 as of 31st December, 2024.

根据风险评估结果，将供应商分为三个级别：低风险、高风险、零容忍。我们对各级供应商采取了风险控制措施。具体如下：

The suppliers are divided into low risk and high risk levels as per the risk assessment results. We have taken risk control measures for suppliers at all levels. The details are as follows:

风险水平 Risk level	供应商类型 Supplier type	风险控制措施 Risk control measures
低风险 Low risk	现有供应商 Existing suppliers	<p>可以订购新的白银材料。现有订单可以发货。</p> <p>New silver materials can be ordered. Existing orders can be shipped.</p>
	新的供应商 New suppliers	<p>可接受新供应商。</p> <p>New suppliers are acceptable.</p>
高风险 High risk	现有供应商 Existing suppliers	<p>所有未登记的订单都应暂停。</p> <p>All unregistered orders should be suspended.</p> <p>如果货物已上船，应按照销售退货程序处理。</p> <p>If the goods have been shipped, they shall be handled according to the sales return procedure.</p> <p>重新评估应在最后一次评估后 180 天内进行。如果不符合现象消失，可以继续与供应商的合作，并将供应商列为低风险。</p> <p>The reassessment should be conducted within 180 days after the last assessment. If the non-conformity disappears, the cooperation with suppliers can be continued and they can be listed as low risk suppliers.</p> <p>监控和评估结果应定期向相关高级管理层报告，以支持管理层决定是否与供应商合作。</p> <p>The monitoring and assessment results should be</p>

		reported to the relevant senior management on a regular basis to support the management in deciding whether to build cooperation with suppliers.
	新的供应商 New suppliers	不能接受新供应商 No new supplier is acceptable.
零容忍 zero-tolerance	现有供应商 Existing suppliers	立即终止所有未完成订单。 All outstanding orders shall be terminated immediately. 如果货物已上船，应按照销售退货程序处理。 If the goods have been shipped, they shall be handled according to the sales return procedure.
	新的供应商 New suppliers	不能接受新供应商。 No new supplier is acceptable.

2024 年度公司白银供应链共涉及 40 家供应商，其中 9 家被评估为高风险供应商，风险类型主要涉及位置风险（受制裁/冲突地区）。针对该风险，公司通过每月查询政府官方网站，紧密监控、跟踪风险，并在最后一次评估后 180 天内重新评估风险等级。若不符合现象消失，经评估后可将供应商列为低风险，由管理层决定是否与供应商继续展开合作。

In 2024, the Company's silver supply chain involved 40 suppliers, among which 9 were assessed as high-risk suppliers. The risk types mainly involve location risks (located in sanctioned/conflict areas). In response to this, the Company closely monitors and tracks risks by querying official government websites monthly. The risk level will be reassessed within 180 days after the last assessment. If the non-compliance phenomenon disappears, the supplier can be reclassified as a low-risk supplier after assessment, and it is Company managers who decide whether to continue cooperation with the supplier.

据调查，位于赞比亚西北省的坎桑西铜矿于 2024 年 9 月 22 日发生一起员工伤亡事故。依据当地政府安全监管指令，该矿区已于事故当日启动全面停产整顿程序，我司同步暂停与该矿相关的原材料采购业务，待事故调查结论及整改验收完成后另行评估供应链恢复方案。

According to the investigation, a fatal accident involving employees occurred at the Kansanshi Copper Mine in North-Western Province, Zambia, on September 22, 2024. In accordance with the safety supervision instructions of the local government, the mine has initiated a comprehensive suspension and rectification process since the date of the accident. Our company has also suspended the raw material procurement business related to this mine simultaneously. After the conclusion of the accident investigation and the completion of the rectification acceptance, the supply chain restoration plan will be re-evaluated.

市场部作为持续尽职调查的一个部门，在供应商选择和合作上，

需要持续关注合作风险，并进行风险评估。如果发现低风险供应商现有的正常合作可能涉及洗钱和恐怖融资、促进冲突、侵犯人权，应立即暂时停止原料采购并开展相关调查；如果有确凿证据证明供应商涉及洗钱和恐怖融资、促进冲突、侵犯人权，公司应立即停止采购，终止合作关系。

The Marketing Department, being responsible for continuous due diligence, needs to keep an eye on the cooperation risks and conduct risk assessment with respect to supplier selection and cooperation. If it is found that the existing normal cooperation of low-risk suppliers is possibly involved in money laundering, terrorist financing, conflict promotion and human rights abuses, the procurement of raw materials should be suspended immediately and relevant investigations are required. If there is conclusive evidence showing that the supplier gets involved in money laundering, terrorist financing, conflict promotion and human rights abuses, the Company should immediately cease the procurement and terminate the cooperation relationship.

第四步：安排对供应链的尽职调查进行独立第三方审计

Step 4: Conduct an independent third-party audit of the Supply Chain due diligence

合规声明与要求：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。

Compliance Statement and Requirement: The Company has fully complied with Step 4.

公司严格遵守 LBMA 白银责任指南第四步“对精炼商的尽职调查实践开展独立的第三方审计”的要求。公司与必维认证（北京）有限公司（以下简称“必维认证”）签订了一份协议，委托 BV 依据 ISAE3000 进行 2024 年度的合理保证鉴证业务，对我们遵守 LBMA 责任白银指南的合规性进行独立第三方审计。

The Company strictly abides by the requirements of *LBMA Responsible Silver Guidance* STEP 4 “Arrange for an independent third-party audit of the supply chain due diligence”. The Company has signed a service agreement with Beijing Branch of Bureau Veritas Certification Co., Ltd. (hereinafter referred to as "BV Certification"). BV Certification was entrusted to carry out a reasonable assurance business in 2024 in accordance with international standard (ISAE 3000) and conduct an independent third-party audit on our compliance with *LBMA Responsible Silver Guidance*.

本次审核发现一个中风险项目，公司通过内外相关网站对信息进行搜集核实，并于 2025 年 3 月 30 日完成整改。对上一审核年度发现的不符合项已于 2024 年 3 月 12 日整改完成闭合。

This audit identified one medium-risk item, and the Company collected and verified the information through internal and external relevant websites, and completed the rectification on March 30, 2025. The non-conformities identified in the previous review year were rectified and closed on March 12, 2024.

公司按时编制 2024 年度供应链尽职管理合规报告，该报告将在公司网站（<http://www.zijinty.com>）进行公示。

The Company compiled the *2024 Annual Supply Chain Due Diligence Management Compliance Report* on time, and this report would be publicly announced on the company's website (<http://www.zijinty.com>).

第五步：每年报告一次供应链尽职调查

Step 5: Report on supply chain due diligence annually

合规声明与要求：公司完全遵守了第5步：供应链尽职调查年度报告。

Compliance Statement and Requirement: The Company has fully complied with Step 5.

公司根据《LBMA 责任白银指南》发布了《紫金铜业白银供应链尽职调查合规报告（2024 年）》，以报告截至 2024 年 12 月 31 日的供应链尽职调查情况。

The Company has released the *Compliance Report on Silver Supply chain Due Diligence of Zijin Copper Co., Ltd. (2024)* as per the *LBMA Responsible Silver Guidance* in order to report the supply chain due diligence as of 31st December, 2024.

三、管理结论

III. Management Conclusion

截至 2024 年 12 月 31 日，公司建立了供应链过程和控制的管理体系，发布并实施了尽职调查管理政策。公司还收集了所有供应商信息，识别和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，并在 2024 年编制了供应链尽职调查报告。

As of 31st December, 2024, the Company has established the management system of supply chain process and control, issued and implemented the due diligence management policy. The Company has also collected all suppliers' information, identified and assessed the risks in the supply chain, formulated risk control measures, arranged an independent third-party audit on supply chain due diligence, and prepared the supply chain due diligence report for year 2024.

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，并将负责的白银供应链流程与我们现有的供应链流程更有效地结合起来，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 performing continuous improvement on the basis of the existing due diligence investigation system of the silver supply chain. The Company also aims to combine the responsible silver supply chain process with our existing supply chain process more effectively. Any corrective actions identified will be monitored internally on a regular basis.

四、其他

IV. Miscellaneous

如果本报告用户希望就本报告向紫金铜业有限公司进行任何反馈，则可以通过拨打 +86 0597-3626837 或发送电子邮件至 zjtyylcgk@zijinmining.com，联系公司相关部门。

If you have any suggestion to Zijin Copper Co., Ltd., please feel free to contact us by +86 0597-3626837 (telephone) or

zjtyylcgk@zijinmining.com (e-mail).