



March 2018

**LBMA Responsible Gold Guidance –
Summary Assessment Report
For third-party audits based on ISO19011:2011**

According to LBMA provision this document has to be made publicly available by the refiner.

Company Name:	Zijin Mining Group Gold Smelting Co., Ltd.
Reference Standard: LBMA RGG	Other ref.: ISO 19011:2011

Audit Team	
Team Leader:	Team Member:
Henry TENG	NA

Type of Audit	Date of Opening Audit	Date of Closing Audit	Total n° of man/days
Full assessment Audit			
Assessment Review	12/Feb./2019	13/Feb./2019	2
Follow-up Assessment			

Site(s) address(es):	19, Qingang Road, Shanghang, Fujian, China
Refiner Contact Person: Name, Title: Email: Phone:	Name: Mr. Zhenglin Liang
	Title: Office Vice Manager
	lzlgz@163.com
	+0086-13859509309

	Non Compliance – risk level				
	Compliant	Low	Medium	High	Zero Tolerance
Based on the assessment conclusions, the overall rating of the Refiner’s performance is determined to represent:	Yes				

Is a follow up visit required? (in case of high risk non-compliance)		Yes	No
Date(s) of follow up visit:	No	Assigned auditor:	NA

AUDIT SUMMARY
Basic Inputs
<ul style="list-style-type: none"> Confirm if the data provided in the application/ self-assessment phase is valid. <i>This is an assessment audit for gold carried out by BV. One auditor and 2 man days were arranged for this audit.</i>



March 2018

LBMA Responsible Gold Guidance –
Summary Assessment Report
For third-party audits based on ISO19011:2011

See Third party Audit Checklist (GENERAL INFO POINT F) and describe below percentages

There are total 57 gold supplier during the year 2018 (from Jan.1/2018 to Dec.31/2018)

The number of gold supplying counterparties is as follows:

Industrial mining operations (large or small scale): 1.26%

Type of companies: //Gold Mine Company

Forms of Gold: // Gold mine

Countries of provenance: // China

Artisanal mining operations: 0%

Type of companies: //

Forms of Gold: //

Countries of provenance: //

Traders / brokers: 19.61%

Type of companies: // individual person

Forms of Gold: // recycle gold

Countries of provenance: // China

Recycled material/collectors: 21.79%

Type of companies: // gold company, jewelry company

Forms of Gold: // recycle gold

Countries of provenance: // China

Industrial scrap providers: 0%

Type of companies: //

Forms of Gold: //

Countries of provenance: //

Others: 57.34%

Type of companies: // SGE (Shanghai Gold Exchange)

Forms of Gold: // 1kg standard gold bar

Countries of provenance: // China

0 high risk gold supplying counterparty is found during the audit.

100% of the suppliers are classified as low risk suppliers and 0% of them are classified as medium risk suppliers.

Description of the company activities [mandatory for all audits]:

The company is a state holding company with over twenty years for production of gold bars refinery process. The company is one of the 7 companies first recognized by Shanghai Gold Exchange as an enterprise that is able to provide standard gold bullion

The refinery consists of electrowinning, refining and regeneration units. In recent years, some in-house new processes were developed with high temperature, pressure, cyanide-free gold loaded carbon desorption, electrowinning, vertical constant current carbon regeneration furnace, hydrometallurgy and extraction for rapid refining to guarantee over 99.999% ultra-high purity gold production.

The product categories range from 1kg, 3kg and 12.5kg standard gold bullions. The company also process small gold bars to customers' requirement and take on externally for gold loaded carbon desorption, EW, purification & reprocessing of gold alloy and sales of 99.999% gold products. "Zijin" trademark is recognized as "International standard production" sign. The company have China Quality 21315® quality AAA credit rating and



**LBMA Responsible Gold Guidance –
Summary Assessment Report
For third-party audits based on ISO19011:2011**

are listed in the London Bullion Market Association (LBMA) suppliers.

The company and factory are also certified to meet ISO 9001, ISO 14001 and OHSAS 18001 standards and subject to regular and routine audit by third party. Details of these certificates can be found from the company official web site <http://www.zjky.cn>

Manual adequacy:

Key clauses in LBMA Responsible Gold Guidance are addressed in the LBMA compliance policy statement that is prepared by the LBMA compliance committee.

All applicable statutory requirements are mandatory implemented and maintained.

Assessment of level of compliance of Refiner’s systems, processes, procedures and practices according to the LBMA Responsible Gold Guidance:

Step 1: Establish strong Refiner management systems

See Third party Audit Checklist

1. Adopt a Refiner policy regarding due diligence for supply chains of Gold. Provide an overview of the management systems governing the due diligence policy for Gold supply chains.
2. Set up an internal management structure to support supply chain due diligence. Review the management structure for due diligence, including the methods of communication to internal and external parties.
3. Establish a strong internal system of due diligence, controls and transparency over Gold supply chains, including traceability and identification of other supply chain actors. Inventory Control Mechanism: Conduct a review of the inventory control mechanism and the documentation kept on file for Gold bearing material.
4. Strengthen Refiner engagement with Gold supplying counterparties, and where possible, assist Gold supplying counterparties in building due diligence capacities. Review the due diligence policy communicated to the Gold bearing counterparties.
5. Establish a Refiner-wide communication mechanism to promote broad employee participation and risk identification to management. Review the internal communication mechanisms in place at the Refiner focusing on the mechanism for voicing concerns over the gold supply chain.

The refiner has developed the LBMA compliance policy regarding due diligence for supply chain of Gold in compliance with LBMA Responsible Gold Guidance. This policy is published in the company website available at <http://www.zjky.cn/product/zjchangye-detail-21203.htm>. The policy provides an executive summary of the management systems and procedures governing the due diligence policy for gold supply chains. The policy was last issued on Jan.8,2016

The refiner has implemented an internal management structure to support supply chain of gold in compliance with LBMA Responsible Gold Guidance. The LBMA compliance team is led by the deputy president of Zijin Mining Group with four compliance team members including office manager, market manager, finance manager, group market manager. Regular training sessions are held for all staff involved with or holding responsibilities related to the supply chain, as well as the management team. At least annually, the last training was conducted on Nov.13/2018 and the training records were kept well. The Company Policy is communicated to all employees related to the gold-refining process. The refiner has appointed a compliance officer responsible for enforcing the implementation of the due diligence procedures and who reports to the management. The Senior Management is responsible for overseeing the supply chain and ensures that the compliance department and related departments are provided with adequate resources in order to fulfil their responsibilities.

The refiner upholds the implementation of their internal due diligence procedures, controls and processes. Transactions are consistently recorded and records are kept for a period of at least 5 years.



**LBMA Responsible Gold Guidance –
Summary Assessment Report
For third-party audits based on ISO19011:2011**

The refiner has requested that all gold-supplying counterparties have committed to and acknowledged in writing compliance with the refiner’s own Company Policy. The policy is communicated to all counterparties on a yearly basis through purchasing contract or commitment letter.

The refiner has a communication mechanism in place that allows employees to voice concerns over the Gold supply chain or any newly identified risk via suggestion box anonymously. Based on interview, employees are aware of the mechanism.

STEP 2: Identify and assess risk in the supply chain

See Third party Audit Checklist

1. Identify risks in the Gold supply chain. Assess the risk assessment policy for all Gold supply chains.
2. Assess risks in light of the standards of their supply chain due diligence system: Supply chain due diligence: Review “Gold supplying counterparty” files to verify if the Refiner collects the required basic information for all business entities
3. Risk assessment reporting. Evaluate the risk assessment reporting mechanisms, organization chart and communication

The refiner has a system for assessing risk among Gold supplying counterparties according to the LBMA Responsible Gold Guidance. The system allows taking into account risks in the entire Gold supply chain from the point of origin to the refiner. The risk assessment applies to all inputs of mined Gold and recycled Gold received within the assessment period. The refiner has clearly defined risk categories and has procedures prescribing enhanced monitoring for any high-risk categories identified during the due diligence procedures. The company uses relevant criteria to determine areas that are conflict-affected, high risk transit areas that carry high risk of human rights abuses, high risk of money laundering, crime or corruption.

The refiner collects information to determine risk categories. The refiner has assigned a risk level to each gold supplier. During the assessment period, all 57 gold suppliers are assigned as low risk

No subcontractor is used by the refiner.

The refiner has a risk based approach for monitoring transactions to ensure that these are consistent with information on the counterparties’ supply chain and risk profile. The refiner systematically request, gather and maintain the following documentation on file for each lot of Gold-bearing material received.

The Compliance Officer regularly reports risk assessment and results to the Senior Management. The Senior Management is responsible for approving each new supply chain assessed as high risk, and re-assesses these on an annual basis to determine whether the business relationship should continue. Till now no high risk supplier was found.

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

See Third party Audit Checklist

1. Policy: formal risk mitigation strategy in place.
2. Improvement plans: strategy regarding the procedures for following up on improvement plans.

Risk mitigation strategy has been established formally in the refiner’s procedure. Senior Management actively provides support for this strategy. Assessment results did not present any high-risk counterparties at this time.

The Compliance Officer and the compliance team are aware of the enhanced due diligence measures and these are documented ready to be implemented if necessary.

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



**LBMA Responsible Gold Guidance –
Summary Assessment Report
For third-party audits based on ISO19011:2011**

See Third party Audit Checklist

This is the five year that the refiner completes an LBMA Gold Guidance, with audits completed once a year. The refiner has ensured that these audits are diligently completed in accordance with the LBMA Guidance and the OECD Guidance.

STEP 5: Report on supply chain due diligence

See Third party Audit Checklist

Refiners should make available their company policy regarding gold supply chain and the LBMA Summary Report.

The refiner publishes the LBMA Summary report and Company Policy on their website (<http://www.zjky.cn/product/zjchangye-detail-21203.htm>).

ASSESSMENT CONCLUSIONS						
CATEGORY	SUBCATEGORY	Compliant	Non compliance – risk level			
			Low	Medium	High	Zero Tolerance
General Information		✓				
Step 1: Establish strong Refiner management systems	1.1	✓				
	1.2:	✓				
	1.3	✓				
	1.4	✓				
	1.5	✓				
Step 2: Identify and assess risk in the supply chain	2.1	✓				
	2.2	✓				
	2.3	✓				
Step 3: Design and implement a management strategy to respond to identified risks	3.1	✓				
	3.2	✓				
Step 4: Arrange for an independent third-party audit of the supply chain due diligence	4.1	✓				
Step 5: Report on supply chain due diligence	5.1	✓				
Based on the above assessment conclusions, the overall rating of the Refiner's performance is determined to represent:		✓				



March 2018

**LBMA Responsible Gold Guidance –
Summary Assessment Report**
For third-party audits based on ISO19011:2011

Assessment scope:	
<i>Refiner location(s) included in the assessment scope</i>	19, Qingang Road, Shanghang, Fujian, China
<i>Assessment Period</i>	Jan.1/2018~Dec.31/2018
Assessment methodology:	
<ul style="list-style-type: none"> • The evidence of compliance that was reviewed included: Gold supplier chain policy, gold supplier chain due diligence procedure, gold source risk assessment procedure, gold risk mitigation strategy, traceability system, training record, risk assessment record, business certification, mine certification, transaction record, gold receiving book, gold assay record, etc. • The following areas of the facility were visited during the tour: Office, warehouse, refine workshop, casting workshop, gold product end-processing workshop, lab and all the activities production area related gold product. • The following interviews were conducted with management: Mr. Fengxian Lin, GM • The following interviews with employees were conducted: Mr. Zhenglin Liang, Compliance officer Mr. Weirong Qiu, Finance manager Ms. Lixia Huang, Market manager Ms. Xiuping Chi, Warehouse 	
Any significant or inherent limitations or areas not covered that were within the assessment scope:	
There were no significant or inherent limitations or areas not covered that were within the assessment scope.	
Assessment criteria:	
<ul style="list-style-type: none"> • The auditor or assessment team took into account all relevant objective evidence provided by the Refiner. Relevant evidence was either qualitative or quantitative in as far as it is appropriate and sufficient to support the auditor or assessment team’s conclusions. Appropriate evidence is evidence that is relevant and reliable. Sufficient evidence refers to the amount of evidence provided to allow the auditor or assessment team to reach a conclusion. <p>Any actual or potential gaps in the Refiner’s systems in regards to the LBMA requirements are rated in accordance to the level of risk each presents to the credibility and integrity of the LBMA Responsible Gold Programme for the responsible sourcing of gold-bearing materials.</p>	

The Auditors confirm that:

- ✓ The information provided by the Refiner is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ✓ The findings are based on verified Objective Evidence relevant to the time period for the assessment, traceable and unambiguous.



BUREAU
VERITAS

March 2018

LBMA Responsible Gold Guidance –
Summary Assessment Report
For third-party audits based on ISO19011:2011

- ✓ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
- ✓ The Auditor(s) are properly qualified to carry out the assessment at this Refiner's facility.

Lead Auditor: Henry TENG

Signature:

Date: 13/Feb./2019