# 福建金玉德尚精炼科技有限公司

# Fujian Jinyudeshang Refinery Tech Co.Ltd.

# **反洗钱规章制度**

**Anti-Money Laundering Rules and Regulations**

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## 总则

## Chapter I General Provisions

1. 为了预防洗钱活动，规范反洗钱工作，根据《中华人民共和国反洗钱法》和相关的法律法规，结合公司的实际情况，制定本制度。

Article 1 In order to prevent money laundering activities and regulate anti-money laundering work, this system is formulated in accordance with the Anti-Money Laundering Law of the People's Republic of China and relevant laws and regulations, taking into account the actual situation of the company.

## 组织管理

## Chapter II Organisational management

1. 根据公司反洗钱管理目标，成立反洗钱领导小组及反洗钱办公室，指定一名高级管理人员任组长，负责反洗钱管理工作。反洗钱办公室直接向反洗钱主管领导负责，负责反洗钱的日常管理工作。

Article 2 According to the company's anti-money laundering management objectives, the company establishes the anti-money laundering leading group and the anti-money laundering office, and designates a senior management personnel as the head of the group, responsible for anti-money laundering management. The anti-money laundering office is directly responsible to the anti-money laundering supervisor for the daily management of anti-money laundering.

1. 确定反洗钱办公室负责公司反洗钱规章制度的合规管理工作，对反洗钱工作进行监督、检查、协调。

Article 3 Determines that the Anti-Money Laundering Office is responsible for the compliance management of the Company's anti-money laundering rules and regulations, and supervises, inspects and coordinates the anti-money laundering work.

1. 规定反洗钱领导小组、反洗钱办公室、其他相关职能部门及各相关岗位的职责，形成所有的层次、部门和岗位，各司其职，各负其责，齐抓共管反洗钱工作的组织管理体系。

Article 4 Stipulates the duties of the Anti-Money Laundering Leading Group, the Anti-Money Laundering Office, other relevant functional departments and all relevant positions, forming an organisational and management system in which all levels, departments and positions, each with its own duties and responsibilities, are in charge of anti-money laundering work.

1. 反洗钱领导小组职责

Article 5 Responsibilities of the Anti-Money Laundering Steering Group

·审议批准公司的反洗钱规章制度，并监督制度的有效实施。

-Considers and approves the company's anti-money laundering regulations and supervises the effective implementation of the system.

·对公司反洗钱制度的有效性和及健全性做出评价，以使存在的缺陷得到及时有效的解决。

-Evaluate the effectiveness and soundness of the company's anti-money laundering system so that deficiencies can be addressed in a timely and effective manner.

·对公司反洗钱风险进行监督管理。

-Supervises and manages the company's anti-money laundering risks.

·审议批准反洗钱办公室提交的反洗钱工作报告和总结。

-Considers for approval the reports and summaries of anti-money laundering work submitted by the Anti-Money Laundering Office.

·审核反洗钱信息资料的统计与上报。

-Audit the statistics and reporting of anti-money laundering information.

1. 反洗钱办公室职责

Article 6 Duties of the Anti-Money-Laundering Office

·统一监督、协调公司的反洗钱工作。

-Unified supervision and coordination of the company's anti-money laundering work.

1. 财务管理中心职责

Article 7 Responsibilities of the Financial Management Centre

·熟悉掌握签约客户的所有制性质、业务经营的品种与范围、业务经营规模等状况。

-Familiarise yourself with the nature of ownership, the variety and scope of business operations, and the scale of business operations of the contracted clients.

·负责对异常交易进行分析、审核和判断，发现问题，及时报告。

-Responsible for analysing, reviewing and judging abnormal transactions, identifying problems and reporting them in a timely manner.

·注意观察、了解客户资金的动向，发现可疑交易，随时向反洗钱领导小组报告。

-Pay attention to observe and understand the movement of customers' funds, and report suspicious transactions to the anti-money laundering leading group at any time.

·特别关注大额资金交易，化整为零的资金交易等情况，一经发现，应立即按公司相关规定上报。

-Special attention is paid to cases such as large amount of fund transactions, and fund transactions that have been converted into fractions, etc., which should be reported immediately in accordance with the relevant regulations of the Company once they are discovered.

1. 会员营销中心职责

Article 8 Responsibilities of the Membership Marketing Centre

·负责客户有效身份证件或有效身份证明文件等信息资料的审核与登记。

-Responsible for the review and registration of information materials such as valid identification documents or valid identification documents of customers.

·负责客户企业法人营业执照等信息资料的审核与登记。

-Responsible for reviewing and registering the business licence and other information of the customer's enterprise legal person.

·负责留存保管客户有效身份证件或有效身份证明文件的复印件或者影印件等相关资料。

-Responsible for the retention and safekeeping of relevant information such as copies or photocopies of valid identification documents or valid identification documents of customers.

·有效利用公司交易平台，收集、筛选可能预示潜在反洗钱问题的数据，及时向反洗钱领导小组汇报任何可疑交易情况。

-Effectively utilise the Company's trading platform to collect and screen data that may indicate potential AML issues and report any suspicious transactions to the AML Leadership Team in a timely manner.

1. 业务运营部门职责

Article 9 Responsibilities of the business operation department

·负责对客户相关信息的尽职调查。

-Responsible for due diligence on customer related information.

·负责对客户相关信息变更时的跟踪管理。

-Responsible for tracking and managing changes in customer-related information.

·负责了解签约客户的经营活动基本情况等信息。

-Responsible for knowing the basic information about the business activities of contracted customers.

·负责取得客户有效身份证件或有效身份证明文件。

-Responsible for obtaining a valid identification document or a valid identification document from the client.

## 客户身份识别和资料保存措施

## Chapter III Customer identification and data retention measures

1. 遵循“了解你的客户”的原则，在相关业务中，勤勉尽责，建立健全并严格执行客户身份识别制度。

Article 10 In accordance with the principle of "know your customer", the Company shall exercise due diligence and diligence in its business operations, and shall establish a sound and strictly enforced customer identification system.

1. 针对具有不同洗钱风险特征的客户、业务关系或者交易，采取深入实际调查、访问、调阅相关资料等相应措施，了解客户及其交易目的和交易性质，了解实际控制客户的自然人及其交易情况。

Article 11 For customers with different money-laundering risk characteristics, business relationships or transactions, to take in-depth practical investigations, visits, access to relevant information and other appropriate measures to understand the customer and the purpose of their transactions and the nature of the transaction, and to understand the actual control of the customer's natural persons and their transactions.

1. 在与客户建立相关业务关系时，应遵守并严格执行实名制，切实做好客户尽职调查工作，取得来源可靠的资料信息，充分了解其业务经营状况。

Article 12 In establishing relevant business relationships with customers, the real-name system shall be observed and strictly enforced, and customer due diligence work shall be effectively done to obtain information from reliable sources and fully understand their business operation status.

1. 对于下列客户，应通过“全国公民身份证核验系统”或其他合理手段等审核客户的有效身份证件或有效身份证明文件，登记身份基本信息，留存有效身份证件或有效身份证明文件的复印件或者影印件，了解其经营活动基本情况。

Article 13 For the following customers, through the "National Citizen Identity Card Verification System" or other reasonable means, such as auditing the customer's valid identification documents or valid identification documents, registering basic identity information, retaining copies or photocopies of valid identification documents or valid identification documents, and understanding the basic conditions of their business activities.

·要求与清算组织建立业务关系的客户。

-Customers requesting a business relationship with a clearing organisation.

·要求利用公司的业务系统或服务网络收款的产品或服务的提供方，但个人非经常性转让物品且当月累计收款金额在2万元以下。

-Providers of products or services that require the use of the company's business system or service network to collect payments, provided that the individual transfers the items on a non-recurring basis and the cumulative amount of payments collected during the month is less than 20,000 RMB.

·现金交易金额单笔或当日累计人民币5万元以上。

-Cash transaction amount of RMB 50,000 or more in a single transaction or in the aggregate on the same day.

·进行现金交易的法人和其他组织。

-Legal persons and other organisations that carry out cash transactions.

第十四条 对于利用自身业务处理系统与公司业务处理系统对接方式进行网上支付的客户，在与其建立业务关系时，必须取得来源可靠的资料信息，充分了解其经营活动状况。

Article 14 When establishing a business relationship with a customer that uses its own business processing system to interface with the company's business processing system to make online payments, it is important to obtain information from reliable sources and to fully understand the status of the customer's business activities.

1. 建立客户风险等级管理制度，按照客户的特点，并考虑地域、业务、行业等因素，划分客户的风险等级，加强对高风险客户的管理。

Article 15 A customer risk level management system has been established to classify customers' risk levels according to their characteristics and taking into account factors such as geography, business and industry, and to strengthen the management of high-risk customers.

1. 在与客户建立业务关系时，在签订的合同或协议中，应有提醒客户及时更新身份信息的条款，适时提醒客户及时更新身份信息。凡是客户已经提交的身份证件或身份证明文件已过有效期，但没有在合理期限内更新且没有提出合理理由的，应中止为其办理约业务。

Article 16 When establishing a business relationship with a customer, there should be a clause in the contract or agreement signed that reminds the customer to update his or her identity information in a timely manner. Where a customer has submitted an identity document or an identity document that has expired but has not updated it within a reasonable period of time and has not provided a reasonable excuse, the handling of the contractual business for the customer shall be suspended.

1. 要利用“全国公民身份证核验系统”和支付业务处理系统，预防利用假名交易、匿名交易进行的洗钱等违法犯罪活动。

Article 17 The National Citizen Identity Card Verification System and the Payment Business Processing System should be used to prevent money laundering and other illegal and criminal activities using false names and anonymous transactions.

1. 未留存有效身份证件或有效身份证明文件的复印件、影印件的客户，应审核该客户的有效身份证件或有效身份证明文件，登记身份基本信息，留存有效身份证件或有效身份证明文件的复印件或者影印件。

Article 18 Customers who have not retained a valid identity document or a copy or photocopy of a valid identity document shall review the customer's valid identity document or a valid identity document, register the basic identity information, and retain a copy or photocopy of the valid identity document or a valid identity document.

1. 对上述客户提供的有效身份证件或有效身份证明文件审核无误后，要留存有效身份证件或有效身份证明文件的复印件或影印件，并妥善保管。

Article 19 After reviewing and approving the valid identification documents or valid identification documents provided by the above customers, copies or photocopies of the valid identification documents or valid identification documents shall be retained and kept in a safe place.

**第二十条** 应通过合理手段审核对公客户的有效身份证件或有效身份证明文件；登记客户的“身份基本信息”，包括客户的名称、住所、经营范围；可证明该客户依法设立或者可依法经营、开展社会活动的执照、证件、文件的名称、号码。

Article 20 Shall, by reasonable means, verify the valid identity documents or valid identity documents of public customers; register the "basic identity information" of customers, including the name, residence and business scope of the customer; and the name and number of the licence, document or document that can prove that the customer has been established in accordance with the law or can operate and carry out social activities in accordance with the law.

**第二十一条** 应通过合理手段审核个人客户的有效身份证件或有效身份证明文件；登记客户的“身份基本信息”，包括客户的姓名、国籍、住所地或者工作单位地址、联系方式，以及客户有效身份证件或者身份证明文件的种类、号码。

Article 21 Shall examine, by reasonable means, the valid identity documents or valid identity documents of individual customers; register the "basic identity information" of customers, including their names, nationalities, addresses of their places of domicile or workplaces, contact information, as well as the types and numbers of their valid identity documents or identity documents.

## 可疑交易报告

## Chapter IV Suspicious Transaction Reports

**第二十二条** 各岗位在涉及资金交易过程中发现或者有合理理由怀疑交易或交易主体涉嫌洗钱等犯罪活动的，应在交易发生后的10个工作日内向公司反洗钱领导小组报告，经领导小组批准同意后向发生可疑交易的客户发出预警通知，提示客户依法提交可疑交易报告进行说明。

Article 22 If each post finds or has reasonable grounds to suspect that the transaction or the subject of the transaction is suspected of money laundering and other criminal activities in the course of the transaction involving funds, it shall report to the anti-money laundering leading group of the Company within 10 working days after the transaction occurs, and issue an early-warning notification to the customer of the occurrence of the suspicious transaction after approval and consent of the leading group, and prompt the customer to submit the STR to make explanations in accordance with the law.

**第二十三条** 客户经核实后认为不存在洗钱等风险的，应要求其在收到预警通知后的10个工作日内，向公司提交情况说明。如果公司反洗钱领导小组认为客户所述理由不足以解除疑点的，应在收到情况说明的3个工作日内，向中国反洗钱监测分析中心提交可疑交易报告。

Article 23 If a customer is verified to believe that there is no risk of money laundering or other risks, he shall be required to submit a statement of circumstances to the Company within 10 working days after receiving the warning notice. If the Anti-Money Laundering Leading Group of the Company considers that the reasons stated by the customer are not sufficient to lift the suspicion, it shall submit a suspicious transaction report to the China Anti-Money Laundering Monitoring and Analysis Centre within three working days of receiving the explanation of the situation.

**第二十四条** 7.3除7.1、7.2规定的情形外，如果各岗位有合理理由怀疑交易或交易主体涉嫌洗钱等活动的，应立即向公司反洗钱领导小组报告，反洗钱领导小组在10个工作日内，向中国反洗钱监测分析中心提交可疑交易报告。

Article 24 7.3 In addition to the circumstances stipulated in 7.1 and 7.2, if each post has reasonable grounds to suspect that the transaction or the subject of the transaction is suspected of money laundering or other activities, it shall immediately report to the Company's Anti-Money Laundering Leading Group, which shall, within 10 working days, submit a suspicious transaction report to the China Anti-money Laundering Monitoring and Analysis Centre.

·各反洗钱岗位应在勤勉尽责的基础上，对异常交易进行分析、审核和判断。如果确定（或者不能排除）交易与洗钱等违法犯罪活动相关，或者不能排除交易涉嫌洗钱等违法犯罪活动的，应在交易发生的6个工作日内，向公司反洗钱领导小组反映情况，反洗钱领导小组在收到情况反映的4个工作日内向中国反洗钱监测分析中心提交可疑交易报告。如果某一交易客观上具有异常交易特征，但反洗钱领导小组有合理理由排除疑点，或者没有理由怀疑该交易或客户涉及违法犯罪活动，则不能将这些交易作为可疑交易报告的内容。异常交易包括但不限于以下情形：

-Each anti-money laundering position shall, on the basis of diligence and due diligence, analyse, review and judge unusual transactions. If it is determined (or cannot be ruled out) that a transaction is related to money laundering and other illegal and criminal activities, or if it cannot be ruled out that a transaction is suspected of money laundering and other illegal and criminal activities, it shall reflect the situation to the anti-money laundering leading group of the Company within six working days of the occurrence of the transaction, and the leading group of the anti-money laundering group shall submit a suspicious transaction report to the China Anti-money laundering Monitoring and Analysis Centre (CAMAC) within four working days of the receipt of the situation reflection. If a transaction objectively has the characteristics of an unusual transaction, but the AML leading group has reasonable grounds to exclude the suspicion, or there is no reason to suspect that the transaction or the customer is involved in illegal and criminal activities, such transactions cannot be included in the STR. Unusual transactions include, but are not limited to, the following circumstances:

·未留存有效身份证件或有效身份证明文件复印件或者影印件的客户，当月资金收付金额接近但未达到或超过人民币5万元。

-Customers who have not retained a valid identity document or a copy or photocopy of a valid identity document, and the amount of funds received or paid during the month is close to, but has not reached or exceeded, RMB 50,000 yuan.

·客户姓名或名称与司法机关、执法机关、监管部门、联合国安理会所发布的犯罪嫌疑人名单相同或类似的。

-Customer name or name is the same or similar to the list of suspected criminals issued by the judiciary, law enforcement agencies, regulatory authorities, the United Nations Security Council.

·客户经常性发生单笔整数交易。

-Customers routinely incur single whole number transactions.

·客户的交易频率、交易金额或交易时间，与其所经营的业务明显不符的。

-The customer's frequency of transactions, the amount of transactions, or the timing of transactions that are clearly inconsistent with the business he or she is conducting.

·在约1个月的时间内，客户或他人通过相同IP地址为多名客户办理网上支付业务累计金额较大的。

-If the customer or another person handles online payment services for multiple customers through the same IP address for a cumulative amount that is large within a period of approximately 1 month.

·在约1个月的时间内，有单笔或多笔累计金额较大的资金注入客户在支付组织开立的账户，但该账户并不发生任何支付行为，或者发生交易金额相对注入资金金额明显较小的支付行为的。

-If, over a period of approximately 1 month, there is a single or multiple injection of a cumulative amount of funds into the customer's account opened with the payment organisation, but no payment act occurs on the account, or if a payment act occurs in which the amount of the transaction is significantly smaller in relation to the amount of the injected funds.

·在约1个月的时间内，有多笔或单笔累计金额较大的资金注入客户在支付组织开立的账户，又单笔或分多笔将与所注入资金金额大致相当的资金转出的。

-If, over a period of approximately 1 month, a number of funds or a single cumulative amount of funds have been injected into the client's account with the payment organisation, and funds in an amount approximately equal to the amount of the injected funds have been transferred in a single transaction or in a number of transactions.

·两个或少数几个支付组织的客户，相互间频繁发生资金收付，交易金额较大的。

-Customers of two or a small number of payment organisations, who frequently receive and pay funds to and from each other, with large transaction amounts.

·本制度所称的“金额较大”，对于个人客户的交易，指交易金额接近或超过人民币10万元或外汇等值1万美元；对于机构客户的交易，指交易金额接近或超过人民币20万元或外汇等值2万美元。

-For the purpose of this system, the term "large amount" refers to the transaction amount approaching or exceeding RMB 100,000 or the foreign exchange equivalent of US$10,000 for individual customers, and the transaction amount approaching or exceeding RMB 200,000 or the foreign exchange equivalent of US$20,000 for institutional customers.

**第二十五条** 各部门及各岗位应提供真实、完整、准确的交易信息。如果提交的可疑交易报告经中国反洗钱监测分析中心发现有要素不全或者存在错误的，应在接到补正通知的5个工作日内补正后重新报出。

Article 25 All departments and positions shall provide true, complete and accurate transaction information. If a suspicious transaction report submitted is found by the China Anti-Money Laundering Monitoring and Analysis Centre to have incomplete elements or errors, it shall be corrected and restated within five working days of the notification of correction.

## 客户身份资料和交易记录保存

## Chapter V. Retention of customer identification information and transaction records

**第二十六条** 各部门及各相关岗位应当按照安全、准确、完整、保密的原则，妥善保管客户身份资料和交易记录，确保能足以重视每项交易，以提供识别客户身份、监测分析交易情况、调查可疑交易活动和查处洗钱案件所需要的信息。

Article 26 All departments and relevant posts shall, in accordance with the principles of security, accuracy, completeness and confidentiality, properly store customer identification information and transaction records to ensure that sufficient attention is paid to each transaction in order to provide the information required for identifying customers, monitoring and analysing transactions, investigating suspicious transaction activities and handling money-laundering cases.

**第二十七条** 各部门在办理支付业务时，应当尽可能全面地登记客户姓名或名称、有效身份证件或者身份证明文件的种类和号码、关联银行帐号、交易金额、交易时间、交易目的等信息，并向直接接入支付清算业务系统的金融机构提供交易对方金融机构名称，交易双方姓名或名称、金融账号等信息。

Article 27 When handling payment business, all departments shall register as comprehensively as possible the name or name of the customer, the type and number of the valid identity document or identification document, the associated bank account number, the amount of the transaction, the time of the transaction, the purpose of the transaction, etc., and provide to the financial institutions that have direct access to the payment clearing business system the name of the financial institution of the counterparty to the transaction, and the names or names of the two parties to the transaction, the financial account number and other information.

**第二十八条** 应当按照下列期限保存客户身份资料和交易记录：

Article 28 Shall keep customer identification information and transaction records in accordance with the following deadlines:

·客户身份资料，自业务关系结束当年或者一次性交易记账当年计起至少保存5年。

-Customer identification data shall be kept for at least five years from the year in which the business relationship ends or the year in which the one-time transaction is recorded.

·交易记录，自交易记账当年计起至少保存5年。

-Transaction records are kept for at least 5 years from the year in which the transaction is recorded.

**第二十九条** 如果客户身份资料和交易记录涉及正在被反洗钱调查等的可疑交易活动，且反洗钱等调查工作在前款规定的最低保存期届满时仍未结束的，应将其保存至反洗钱等调查工作结束。

Article 29 If customer identification information and transaction records involve suspicious transaction activities that are being investigated for anti-money laundering, etc., and the investigation for anti-money laundering, etc., has not been completed by the time the minimum retention period stipulated in the preceding paragraph has expired, they shall be retained until the investigation for anti-money laundering, etc., has been completed.

**第三十条** 同一介质上有不同保存期限的客户身份资料或者交易记录的，应当按最长期限保存。同一客户身份资料或者交易记录采用不同介质保存的，至少应当按照上述期限要求保存一种介质的客户身份资料或者交易记录。

Article 30 Where customer identity information or transaction records are stored in the same medium for different periods, they shall be stored for the longest period. Where the same customer identity information or transaction records are kept in different media, at least one medium of customer identity information or transaction records shall be kept in accordance with the above deadline requirements.

**第三十一条** 法律、行政法规和规章对客户身份资料和交易记录有更长保存期限要求的，遵守其规定。

Article 31 Where laws, administrative regulations and rules require longer retention periods for customer identification information and transaction records, the provisions thereof shall be observed.

**第三十二条** 应采取备份管理、异地保存和信息系统控制等，防止客户身份资料和交易记录的缺失、损毁，防止泄露客户身份信息和交易信息。

Article 32 Backup management, off-site storage and information system control shall be adopted to prevent the loss or destruction of customer identity information and transaction records and the disclosure of customer identity information and transaction information.

**第三十三条** 应采取纸质和电子文档等方式保存客户身份资料和交易记录，便于反洗钱调查和监督管理。

Article 33 Shall adopt paper and electronic files and other means to save customer identity information and transaction records to facilitate anti-money laundering investigation and supervision and management.

## 反洗钱工作开展的监督

## **Chapter VI Supervision of the conduct of anti-money-laundering work**

**第三十四条** 审计部门负责对公司反洗钱工作进行审计，审计工作可以由公司内部组织相关部门与人员自行进行审计，也可以聘请外部组织进行委托审计，公司应每季进行一次反洗钱审计工作，也可以根据情况随时进行审计调查。

Article 34 The audit department is responsible for auditing the company's anti-money laundering work, the audit can be carried out by the company's internal organisation of relevant departments and personnel to conduct their own audits, or external organisations can be hired to conduct commissioned audits, the company should be carried out quarterly anti-money laundering audits, but also according to the circumstances of the audit at any time to investigate.

**第三十五条** 审计应重点对公司反洗钱的制度建设情况，反洗钱制度的执行情况，公司反洗钱组织管理架构建设，内部合规部门、反洗钱办公室、反洗钱各岗位履行职责情况等进行审计。

Article 35 The audit shall focus on the construction of the company's anti-money laundering system, the implementation of the anti-money laundering system, the construction of the company's anti-money laundering organisational and management structure, and the performance of duties by the internal compliance department, the anti-money laundering office, and the anti-money laundering positions.

**第三十六条** 对公司存在的反洗钱工作中存在的问题，并落实责任人，要提出整改意见和建议，并监督其落实整改措施的情况，实施跟踪反馈，全程监督制约。

Article 36 Of the company's existence of anti-money laundering in the work of the problem, and the implementation of the responsible person, we must put forward corrective comments and suggestions, and supervise the implementation of its corrective measures, the implementation of tracking feedback, the whole process of supervision and control.

## 反洗钱培训措施

## **Chapter VII Training Measures against Money Laundering**

**第三十七条** 积极开展反洗钱宣传与培训工作，为反洗钱工作营造良好的氛围。以多样化的形式和手段，让公司员工了解反洗钱的特点、国家反洗钱政策和打击反洗钱活动的成果。

Article 37 Actively carry out anti-money laundering publicity and training to create a favourable atmosphere for anti-money laundering work. With diversified forms and means, the Company's employees shall be made aware of the characteristics of anti-money laundering, the national anti-money laundering policy and the results of combating anti-money laundering activities.

**第三十八条** 每年应对管理层和相关工作人员进行反洗钱培训。培训应重点结合公司存在的反洗钱工作特点与案例，充分考虑各部门及各岗位反洗钱职责，有针对性地进行培训与辅导。确保反洗钱专职或兼职人员都能够接受反洗钱知识培训。

Article 38 Annual anti-money laundering training shall be conducted for management and relevant staff. The training shall focus on combining the characteristics and cases of anti-money laundering work existing in the Company, fully considering the anti-money laundering duties of each department and each position, and providing targeted training and counselling. Ensure that full-time or part-time anti-money laundering staff are able to receive anti-money laundering knowledge training.

**第三十九条** 每年应指派相关反洗钱岗位的员工参加中国人民银行、院校或相关部门组织的反洗钱培训，深入理解掌握反洗钱知识，着力提高反洗钱工作人员对可疑交易的分析能力，提高反洗钱工作质量。

Article 39 Each year, employees in relevant anti-money laundering positions shall be assigned to participate in anti-money laundering training organised by the People's Bank of China, colleges and universities, or relevant departments, so as to gain an in-depth understanding and mastery of anti-money laundering knowledge, and make efforts to improve the analytical ability of anti-money laundering staff in respect of suspicious transactions, and to improve the quality of anti-money laundering work.

**第四十条** 组织人员编写反洗钱宣传材料，汇集有关反洗钱案例，发送至每个员工，及时掌握反洗钱基础知识，随时了解反洗钱动态及反洗钱形势，提高员工反洗钱意识及职业敏感度，促进反洗钱工作的有序开展。

Article 40 The organisation prepares anti-money laundering publicity materials, compiles relevant anti-money laundering cases and sends them to each employee, so as to grasp the basic knowledge of anti-money laundering in a timely manner, keep abreast of the anti-money laundering dynamics and the situation of anti-money laundering, raise the awareness of anti-money laundering of the employees and their occupational sensitivity, and promote the orderly development of anti-money laundering work.

## 协助反洗钱调查的内部程序

## **Chapter VIII. Internal procedures for assisting in anti-money-laundering investigations**

**第四十一条** 中国人民银行实施反洗钱调查时，各部门及工作人员应当予以积极配合，如实提供有关文件和资料，不得拒绝或者阻碍。

Article 41 When the People's Bank of China carries out an anti-money laundering investigation, all departments and staff members shall actively cooperate, truthfully provide relevant documents and information, and shall not refuse or obstruct.

**第四十二条** 指定反洗钱办公室为人民银行等主管部门的联系部门。

Article 42 Designates the Anti-Money-Laundering Office as the contact department for the People's Bank and other competent authorities.

**第四十三条** 为了更好地协助反洗钱调查，公司应指派一名相关人员作为联络人，全程配合人民银行做好反洗钱调查期间的沟通、协调、联络等相关事宜。

Article 43 In order to better assist in anti-money laundering investigations, the Company shall assign a relevant person as a liaison person to co-operate with the People's Bank of China throughout the whole process to do a good job in communication, co-ordination, liaison and other related matters during anti-money laundering investigations.

**第四十四条** 当公司收到人民银行进行反洗钱调查的通知后，应立即向主管领导汇报，由公司领导组织相关部门及人员召开会议，并做好相应准备工作。

Article 44 When the Company receives a notice from the People's Bank of China to conduct an anti-money laundering investigation, it shall immediately report to the competent leader, who shall organise a meeting with the relevant departments and personnel and make appropriate preparations.

**第四十五条** 调查人员调阅相关账簿、凭证等信息资料时，联络人应首先与相关部门领导沟通，并提供调阅清单，再由相关人员办理调阅手续后予以提供。调查人员约谈有关人员时，亦应与相关部门领导沟通后予以配合。

Article 45 When investigators access relevant books, vouchers and other information, the contact person shall first communicate with the head of the relevant department and provide a list for access, which shall then be provided by the relevant personnel after going through the access procedures. When the investigator interviews the relevant personnel, he shall also communicate with the head of the relevant department and cooperate with him.

**第四十六条** 对于调查人员涉及封存文件、资料时，应当现场查点清楚，由相关人员或部门主管在封存清单上签名或者盖章后留按规定保管。

Article 46 For investigators involved in the sealing of documents and information, should be on-site check clearly, by the relevant personnel or department heads in the sealing list on the signature or seal and left in accordance with the provisions of the custody.

**第四十七条** 调查结束后，应由反洗钱办公室向公司主管领导汇报相关主管单位反洗钱调查情况。

Article 47 Upon completion of the investigation, the anti-money laundering office shall report the anti-money laundering investigation of the relevant competent unit to the competent leader of the company.

## 反洗钱保密措施

## **Chapter IX Anti-Money Laundering Confidentiality Measures**

**第四十八条** 按要求保管的所有客户身份资料、交易记录和为识别客户身份、监测分析交易情况、调查可疑交易活动和查处洗钱等案件所搜集的信息，必须严格保密，不得向任何无关的单位和个人透漏。

Article 48 All customer identification data, transaction records and information collected for the purpose of identifying customers, monitoring and analysing transactions, investigating suspicious transaction activities and handling cases of money-laundering, etc., which are kept in accordance with the requirements, must be kept strictly confidential and must not be divulged to any unrelated units or individuals.

**第四十九条** 对可疑交易现象要严格保密，除向交易主体进行查询或调查外及报告给反洗钱主管部门外，不得向相关单位和个人泄露有关任何信息。

Article 49 The phenomenon of suspicious transactions shall be kept strictly confidential, and no information shall be divulged to the relevant units and individuals, except for enquiries or investigations to the subject of the transaction and reports to the competent authorities in charge of anti-money laundering.

**第五十条** 对人民银行等机构进行的反洗钱调查情况和相关信息，在调查期间，要严格保密，确保反洗钱工作健康有序进行。

Article 50 The situation of anti-money laundering investigations conducted by the People's Bank and other institutions and related information shall be kept strictly confidential during the investigation period to ensure that the anti-money laundering work is carried out in a healthy and orderly manner.

## 附则

## Chapter X. Bylaws

**第五十一条** 本制度未尽事宜，按国家有关法律法规的规定执行，本制度如与日后国家颁布的法律、法规相抵触时，按有关法律、法规的规定执行，并及时修订。制度的最终解释由反洗钱办公室负责解释。

Article 51 Matters not covered in this system shall be implemented in accordance with the provisions of the relevant national laws and regulations, and this system shall be implemented in accordance with the provisions of the relevant laws and regulations and revised in a timely manner if it contradicts the laws and regulations promulgated by the State in the future. The final interpretation of the system is the responsibility of the Anti-Money Laundering Office.

**第五十二条** 本制度自发布之日起生效实施。

Article 52 The present system shall enter into force and be implemented on the date of its issuance.

福建金玉德尚精炼科技有限公司

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