

2023 年可持续发展与负责任采购合规报告

Sustainability and Responsible Procurement Compliance Report 2023

—— 福建金玉德尚精炼科技有限公司

Fujian Jinyudeshang Refinery Tech Co.,Ltd.

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根据 LBMA 发布的负责任黄金指南的要求，打击系统性或广泛性的侵犯人权行为、避免产生冲突，以及遵守高标准的反洗钱和打击恐怖主义融资行为，公司不断完善黄金供应链尽职调查管理制度，优化调查程序，多角度践行尽职调查的职责。本报告总结了福建金玉德尚精炼科技有限公司 2023 年度内对《伦敦金银市场协会（LBMA）负责任的黄金指南》要求的遵守情况。

In accordance with the requirements of the Responsible Gold Guidelines issued by the LBMA to combat systemic or widespread human rights abuses, avoid conflicts and comply with high standards of anti-money laundering and counter-terrorism financing, the Company has continuously improved its due diligence management system for the gold supply chain, optimised its investigation procedures, and practised due diligence in multiple perspectives. This report summarises Fujian Jinyu Deshan Refining Technology Company Limited's compliance with the requirements of the London Bullion Market Association (LBMA) Responsible Gold Guidelines during FY2023.

精炼厂名称：福建金玉德尚精炼科技有限公司

Refinery Name: Fujian Jinyudeshang Refinery Tech Co.,Ltd.

地址：福建省福州市长乐区鹤上镇珠宝创意园 999 号 4 栋 3F（除 301 室外）

Address: 3F, Building 4, No. 999, Jewellery Creative Park, Heshang Town, Changle District, Fuzhou City, Fujian Province (except Room 301)

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一、精炼厂概况

I. Overview of the refinery

福建金玉德尚精炼科技有限公司（下称“公司”），成立于 2009 年 9 月，注册资本为 1.5 亿元人民币，统一社会信用代码 91440300693994086C，注册地址位于福建省福州市长乐区鹤上镇珠宝创意园 999 号。作为一家集研发、生产、加工、销售于一体的综合型黄金珠宝企业，公司实际控制方为黄金珠宝行业龙头企业——德诚珠宝集团有限公司（下称“集团”），主要从事黄金精炼、黄金珠宝首饰、投资金条及黄金工艺品等生产销售，并开展黄金饰品售后维修和回购等业务。

Fujian Jinyudeshang Refinery Tech Co.,Ltd.(hereinafter referred to as the "Company"), was established in September 2009, with a registered capital of RMB 150 million, unified social credit code 91440300693994086C, and a registered address at No. 999, Jewellery Creative Park, Heshang Town, Changle District, Fuzhou

City, Fujian Province. As a comprehensive gold jewellery enterprise integrating research and development, production, processing and sales, the actual controller of the company is Decheng Jewellery Group Co. (hereinafter referred to as "the Group"), mainly engaged in gold refining, gold jewellery, investment gold bars and gold handicrafts production and sales, and carry out after-sales maintenance and repurchase of gold jewellery and other businesses.

公司拥有黄金湿法精炼生产线一套，黄金来源于集团下属制造工厂、批零销售网点的生产环节边角料、旧黄金饰品以及回收旧饰等再生金。到厂的黄金含量在 75%—99.9%之间，采用国内领先的造粒机造粒、王水溶解、赶硝抽滤、还原洗涤、烘干铸锭工艺提纯获得四九金条；然后采用造粒机造粒、烘干配重，最后采用高效铸锭工艺产出 1kg、3kg 和 12.5kg 各牌号金锭、高纯度提纯金料；该工艺生产周期短、灵活方便、自动化水平高、产品质量稳定。

The company has a set of gold wet refining production line, the gold from the Group's manufacturing plants, wholesale and retail sales outlets of the production process of trimmings, old gold jewellery and recycled gold such as recycled old jewellery. The gold content in the plant is between 75%-99.9%, which is purified by the domestic leading granulator, aqua regia dissolution, nitrate pumping, reduction washing and drying ingot casting process to obtain the 49 gold bars; then granulator is used to make granules, drying and weighting, and finally high efficiency ingot casting process is used to produce 1kg, 3kg and 12.5kg gold ingots of various grades and high purity purified gold materials; This process has a short production cycle, is flexible and convenient, has a high level of automation and stable product quality.

2023 年 10 月，本公司通过评审，荣获“上海黄金交易所可提供标准金锭企业”认证资格，本公司交割入库金锭符合上海黄金交易所标准，自身精炼能力、检测能力均满足上海黄金交易所要求，2023 年 12 月 12 日，上海黄金交易所为本公司颁发认证证书，标志着我们成为福建省福州地区第一家可提供标准金锭的黄金精炼企业。

In October 2023, our company passed the evaluation and won the certification of "Shanghai Gold Exchange can provide standard gold ingot enterprise", our company's delivery and storage of gold ingots meets the standards of Shanghai Gold Exchange, and our own refining capacity and testing capacity meets the requirements of Shanghai Gold Exchange, and on 12 December 2023, Shanghai Gold Exchange issued the certification to our company, marking us as the first gold refining enterprise in Fuzhou, Fujian Province that can provide standard gold ingots. On 12 December 2023, the Shanghai Gold Exchange issued a certificate of certification for our company, marking that we have become the first gold refining enterprise that can provide standard gold ingots in Fuzhou, Fujian Province.

二、供应商概况

II. Overview of vendors

公司黄金原料主要来源是客户委托提纯的黄金旧料，以及从社会中回收的以旧首饰为主的再生金，产品形态分为旧饰、破损饰品、生产环节所产生的边角料，2023 年度所有供应商经过评估均为低风险供应商。

The main sources of the Company's gold raw materials are old gold materials commissioned by customers for purification and recycled gold recovered from the community mainly from old jewellery, with the product form divided into old jewellery,

broken jewellery, and trimmings generated in the production process, and all the suppliers in FY2023 have been assessed as low-risk suppliers.

三、合规情况概述

III. Overview of the compliance situation

公司对所有供应商进行尽职供应链调查，要求所有供应商含金原料来源合法、合规。

The company conducts due diligence supply chain investigations on all suppliers and requires all suppliers to have legal and compliant sources of gold-bearing raw materials.

第 1 步：建立强大的公司管理体系

Step 1: Build a strong company management system

合规声明：

我方已完全遵照第 1 步：建立强大的公司管理体系。

Compliance Statement:

We have fully complied with Step 1: Establish a strong company management system.

1.1 公司黄金供应链尽职调查政策

1.1 Company Gold Supply Chain Due Diligence Policy

2023 年为了建立适当的供应链尽职调查政策和治理结构，监督预防和减轻冲突矿产和/或不利的环境、社会和治理（ESG）因素在公司供应链中的风险，

公司根据新版指南要求更新黄金供应链尽职调查的政策，明确尽职调查流程和调查范围，使得采购政策有据可查，政策明确指出采购不应涉及所有威胁性融资风险，包括经济合作与发展组织附件二所列风险，并根据《负责任黄金指南》明确黄金供应链中需考虑的环境、社会 and 治理（ESG）因素。

2023 In order to establish an appropriate supply chain due diligence policy and governance structure to oversee the prevention and mitigation of the risk of conflict minerals and/or unfavourable environmental, social and governance (ESG) factors in the Company's supply chain, the Company has updated its policy on gold supply chain due diligence in accordance with the requirements of the new version of the Guide, clarifying the due diligence process and scope of the investigations, making the sourcing policy documented, and the policy clearly stating that sourcing should not involve all threatening financing risks, including those listed in Annex II of the Organisation for Economic Co-operation and Development, and clarify the environmental, social and governance (ESG) factors to be considered in the gold supply chain in accordance with the Responsible Gold Guidelines.

公司 2023 年度修订的《黄金供应链尽职调查管理制度》通过了公司执行董事批准，并在公司网站上予以公布，确保了公司黄金尽责体系的有效运行。

The Company's Gold Supply Chain Due Diligence Management System, as amended in FY2023, was approved by the Company's Executive Directors and published on the Company's website to ensure the effective operation of the Company's gold due diligence system.

1.2 内部管理结构

1.2 Internal management structure

公司根据《黄金供应链尽职调查管理制度》及经合组织尽职调查指南附件二建立内部管理体系，对供应链尽职调查方案的实施和持续改进提供有效监督，明确了管理岗位以及对应的职责，在公司执行董事的组织下，公司内部设立了委员会，委员会成员包括公司总经理、生产负责人、质检负责人，执行董事授权委员会任命合规风控官并考察、任用由合规风控官设立的合规小组成员。公司设有合规风控官 1 名，在原料采购、财务、营销、物流、合规风控部门各设置合规专员 1 名。公司的风控官由陈玲玲女士担任，其毕业于中南财经政法大学、中国政法大学，兼有经济、法律复合专业背景，从事经营管理工作多年，并取法律执业资格证书，有丰富的合规实务经验及充足的专业储备，以支持供应链尽职调查流程。

The Company has established an internal management system in accordance with the Gold Supply Chain Due Diligence Management System and Annex II of the OECD Due Diligence Guidance to provide effective supervision of the implementation and continuous improvement of the supply chain due diligence programme, clearly defined the management positions and the corresponding responsibilities, and set up a committee within the Company under the organisation of the Executive Director of the Company, with the Committee members comprising the General Manager of the Company, the Head of Production, and the Head of Quality Assurance,. The executive directors authorise the committee to appoint a compliance risk controller and to examine and appoint members of the compliance team set up by the compliance risk controller. The company has a compliance risk control officer and one compliance specialist in each of the raw material procurement, finance, marketing, logistics and compliance risk control departments. The company's compliance officer is Ms Chen Lingling, who graduated from Zhongnan University of Economics and Law and China University of Political Science and Law, has a composite professional background in economics and law, has been engaged in operation and management for many years, and has obtained the legal practice qualification certificate, has rich experience in compliance practice and sufficient professional reserves to support the

supply chain due diligence process.

公司根据《LBMA 负责任黄金指南（第九版）》的要求，2023 年度期间强化执行董事指定的委员会对于合规小组的引领作用。审批《黄金供应链尽职调查管理制度》，评估合规风控官是否已经获得足够的资源支持开展供应链尽职调查流程和系统的运行和监控。任命黄金供应链合规小组成员，保留供应链的最终控制权和问责制。

The Company reinforces the leadership role of the Executive Director-appointed Committee for the Compliance Group during FY2023, in accordance with the requirements of the LBMA Responsible Gold Guidelines (Ninth Edition). Approved the Gold Supply Chain Due Diligence Management System and assessed whether the Compliance Risk Officer has been provided with sufficient resources to support the conduct of the supply chain due diligence process and the operation and monitoring of the system. Appoint members to the Gold Supply Chain Compliance Group, retaining ultimate control and accountability for the supply chain.

合规风控官负责组织建立、修改管理政策和制度，并检查或帮助设置于各部门的合规专员完成日常的尽责工作。负责编制和更新《黄金供应链尽职调查管理制度》，审查黄金物料采购部门提交的尽职调查流程、系统及结果，评估风险管理策略的有效性，协调黄金供应链风险相关的培训，评审 KYC 文件和风险分类，在高风险供应链或交易中执行适当的措施，必要时直接向执行董事指定的委员会汇报相关工作。

The Compliance Risk Officer is responsible for organising the establishment and modification of management policies and systems, and checking or helping the compliance officers set up in various departments to complete their daily due

diligence work. He/she is responsible for preparing and updating the "Gold Supply Chain Due Diligence Management System", reviewing the due diligence process, system and results submitted by the gold material purchasing department, evaluating the effectiveness of the risk management strategy, coordinating the training related to the gold supply chain risk, reviewing the KYC documents and risk classification, implementing appropriate measures in high-risk supply chains or transactions, and reporting the relevant work directly to the committee appointed by the Executive Director when necessary work.

设置于原料采购部门（即交易部）的合规专员负责在签订合同前组织实施对供应商进行评估，监督与合格供应商的交易，并逐年进行重新评估。在业务谈判和原料采购过程中贯彻和落实 LBMA 的黄金尽职理念。

The Compliance Officer, located in the Raw Materials Purchasing Department (i.e. the Trading Department), is responsible for organising and implementing the evaluation of suppliers prior to the signing of contracts, monitoring transactions with qualified suppliers and re-evaluating them on an annual basis. The LBMA's Gold Due Diligence concept is implemented during business negotiations and raw material procurement.

设置于合规风控部的合规专员负责培训，并协助合规风控官制定公司尽责管理的各项制度建设、开展内部培训、落实监督各部门合规工作实施情况。2023 年度累计开展 4 次培训，直接培训、转培训员工合计比例达到 100%，培训主题包括：《负责任黄金指南（第九版）》的解读、《负责任报告披露指南》的实施、风险减缓及尽职调查规则培训。

The Compliance Officer in the Compliance and Risk Control Department is

responsible for training and assisting the Compliance and Risk Control Officer in formulating various systems for the Company's due diligence management, carrying out internal training, and implementing and supervising the implementation of the compliance work of various departments. 4 trainings were carried out in FY2023, with the ratio of direct training and transferring employees to training reaching 100%, and the topics of the trainings included: interpretation of "The Gold Guide to Responsible Governance (Ninth Edition)", implementation of "Guidelines for Responsible Report Disclosure", and training on risk mitigation and due diligence rules. Report Disclosure Guidelines, risk mitigation and due diligence rules training.

设置于营销部的两名合规风控专员,其中一名负责收集并保存足够的黄金供应链证明文件,负责核实并记录每一批收到的产品信息,物料流转过程和重量的记录,保存化验报告,监督物料的标识和贮存;另一名则负责接洽原料进入精炼厂或离开精炼厂,实施黄金物流运输过程中的尽责工作。

Two Compliance and Risk Control Officers are located in the Marketing Department, one of whom is responsible for collecting and maintaining adequate gold supply chain documentation, verifying and recording information on each batch of product received, recording the flow of materials and weights, maintaining assay reports, and overseeing the labelling and storage of materials, while the other is responsible for liaising with raw materials as they enter or leave the refinery, and carrying out the due diligence process of the logistics of transporting the gold.

设置于财务的一名合规专员,负责供应商代加工和回购业务的合同审批,从财务专业的角度把控合同和资金;对相关的业务、资金活动进行监督,2023年支付和接收都通过银行转账方式,未进行任何现金收付。

A compliance officer set up in finance is responsible for the contract approval of supplier subcontracting and repurchase business, controlling contracts and funds from the perspective of financial expertise; and supervising the related business and financial activities, with payments and receipts made through bank transfers in 2023, and no cash receipts or payments made.

2023 年，福建金玉德尚精炼科技有限公司严格执行《黄金供应链尽职调查管理制度》，对供应商进行风险尽职调查。对所有交易进行监控，以避免与零容忍供应链、高风险供应链建立关系。同时，合规风控官对所有尽职调查过程和结果进行审查，所有的含金物料采购合同都经过了财务合规专员的审批以及执行董事指定的委员会的批准，其间尽职调查管理工作都按要求展开，未发生因调查工作不力或者虚报产生的内部警告或处罚事项。

In 2023, Fujian Jinyu Deshang Refining Technology Co., Ltd. strictly implemented the "Gold Supply Chain Due Diligence Management System" to conduct risk due diligence on suppliers. All transactions are monitored to avoid establishing relationships with zero-tolerance supply chains and high-risk supply chains. Meanwhile, the Compliance and Risk Control Officer reviewed all due diligence processes and results, and all procurement contracts of gold-bearing materials were approved by the Financial Compliance Officer and the committee appointed by the Executive Director, during which due diligence management work was carried out in accordance with the requirements, and no internal warnings or penalties were issued due to ineffective investigations or misrepresentations.

1.3 强有力的内部可追溯体系

1.3 Strong internal traceability system

我公司会对所有的供应商进行尽职调查，填写 KYC 问卷，尽职调查完成后签订合同并要求供应商出具《承诺书》，承诺原料合法合规，符合《黄金供应链尽职调查管理制度》要求。

Our company will carry out due diligence on all suppliers, fill in KYC questionnaires, sign contracts after due diligence is completed, and require suppliers to issue a Letter of Commitment, promising that the raw materials are legally compliant and in line with the requirements of the "Gold Supply Chain Due Diligence Management System".

1.3.1 供应链可追溯体系

1.3.1 Supply chain traceability system

公司建立了一套供应链可追溯体系，根据《负责任黄金指南》中对贵金属各种来源进行识别，每一批移交我公司的原料均有台账记录，包括供应商名称、原产地、材料类型、移交日期、移交重量、成色等。每一批加工完成的成品金料根据来源不同，受托代工的金料需通知客户自提、或交付运输；回购收回的旧料加工成标准金锭，通过上海黄金交易所进行销售，标准金锭均分配唯一编号，所有成品金料均有出库台账记录，包括出库日期、出库重量等。

The company has established a supply chain traceability system to identify the various sources of precious metals according to the Responsible Gold Guide. Each batch of raw materials handed over to our company has a ledger record, including the name of the supplier, origin, type of material, date of handing over, weight of handing over, and colour. Each batch of processed finished gold materials is different according to the source, the commissioned gold materials need to be notified to the

customer for self-pick-up, or delivered for transport; the old materials recovered from buy-back are processed into standard gold ingots and sold through Shanghai Gold Exchange, and the standard gold ingots are all assigned with unique numbers, and all the finished gold materials are recorded in the outgoing account, including the date of outgoing, the weight of the outgoing, etc.

1.3.1.1 来料

1.3.1.1 Incoming materials

我公司不单独配置安保运输团队,所有含金原料运输工作均由母公司德诚珠宝集团有限公司下属的专业黄金安保运输团队承接,该运输团队负责从集团下属各制造中心、各销售网点和回购网点处接洽原料到精炼厂。本公司设置有一名合规专员,在这过程中,合规专员对接集团运输团队,根据来料地址、发货地址进一步排除风险,跟踪运单号,对初级产品的原产地证明、可回收和原始库存的原产地证明进行追溯,若有异常会立即报告给合规风控官并拒收、拒发原料或隔离原料。到厂的原料由验收人员再复核是回收金,每批次原料给一个唯一的编号,并由验收人员在熔铸过程中取样,记录到达的日期和精炼加工及出库过程结束的日期。

Our company does not have a separate security and transportation team, and all transportation of gold-bearing raw materials is undertaken by a professional gold security and transportation team under our parent company, Decheng Jewellery Group Limited, which is responsible for receiving raw materials from the Group's manufacturing centres, sales outlets and repurchase outlets to the refinery. The Company has a compliance officer set up. In this process, the compliance officer

buttresses the Group's transport team, further eliminates risks based on the incoming and outgoing addresses, tracks the waybill number, traces back the certificates of origin of the primary products, the recyclable and the original stock, and immediately reports any abnormality to the Compliance Risk Control Officer and refuses to accept, refuses to issue or segregates the raw materials. Raw materials arriving at the plant are double-checked for recoverable gold by the receiving and inspection staff, and each batch of raw materials is given a unique number and sampled by the receiving and inspection staff during the melting and casting process to record the date of arrival and the date of the end of the refining and processing and outgoing process.

1.3.1.2 发货

1.3.1.2 Dispatch

公司回收的黄金经精炼之后的流向均为上海黄金交易所,受托加工客户多为同属一家母公司的内部子公司,受托加工的金料经过加工之后通过集团内部安保运输团队负责运送至各子公司制造中心、销售网点等,公司会对客户的出库指令进行复核,确认流向商业逻辑合理且手续齐全。这过程中,财务的合规专员需要审批发货单据并审查付款凭据。

The flow of gold recovered by the company after refining is all to the Shanghai Gold Exchange, the commissioned processing customers are mostly internal subsidiaries belonging to the same parent company, the commissioned processing of the gold after processing through the Group's internal security and transportation team is responsible for the delivery of the subsidiaries to the manufacturing centre, sales outlets, etc., the company will review the customer's outgoing instructions to confirm that the flow of the business logic is reasonable and the formalities are complete.

During this process, the financial compliance officer needs to approve the shipping documents and review the payment vouchers.

根据客户需求，公司可以配送，也支持客户上门取货。非福州客户可通过集团安保运输团队押运，或选择第三方物流、予以保价运输，运输费用由客户自行承担；福州的客户可由集团运输团队配送上门，也支持客户到本厂自行提货。

According to customer demand, the company can be delivered, but also support the customer door-to-door pickup. Non-Fuzhou customers can be escorted by the Group's security and transport team, or choose third-party logistics, to be insured transport, transport costs borne by the customer; Fuzhou customers can be delivered to the door by the Group's transport team, but also support customers to pick up their own goods at the factory.

业务部门（经过合规专员初步判断合规）提供客户信息保留物流运输单据，财务部门（经合规专员）审查资金，押运部门（经合规专员）或第三方物流安排实施。上述三个环节层层把关，若押运在实施过程中发现可能存在高风险，则会立即报告并暂停发货。

The business department (after initial judgement of compliance by the Compliance Officer) provides customer information to retain logistics transport documents, the finance department (after review of funds by the Compliance Officer), and the escort department (after preliminary judgement of compliance by the Compliance Officer) or the third party logistics arranges implementation. The above three links are checked at each level, and if the escort discovers that there may be a

high risk during the implementation process, it will immediately report and suspend the shipment.

2023 年度来料，发货按照上述各项管理方法、程序进行了严格的管理，尚未发现零容忍供应链和高风险供应链。

In FY2023 incoming materials, shipments were strictly managed in accordance with all the above mentioned management methods and procedures and no zero tolerance supply chain or high risk supply chain has been identified.

1.3.1.3 过程监控

1.3.1.3 Process monitoring

我公司会对所有的供应商进行尽职调查，填写 KYC 问卷，尽职调查完成后签订合同并要求供应商出具《承诺书》，承诺原料合法合规，符合《黄金供应链尽职调查管理制度》要求，合规小组根据收集到的信息及客户访谈情况进行初级供应商风险评估。

Our company will carry out due diligence on all suppliers and fill in KYC questionnaires. After the due diligence is completed, we will sign a contract and request suppliers to issue a Letter of Commitment to undertake that the raw materials are legally compliant and in line with the requirements of the Due Diligence Management System for Gold Supply Chain, and the compliance team will carry out a risk assessment of the primary suppliers based on the information collected and the interviews with the customers.

公司建立了一套供应链可追溯体系，每一批移交我公司原料均有台账记录，包括供应商名称、移交日期、移交重量、成色等。每一批加工完成的成品金料根据来源不同，受托代工的金料需通知客户自提、或交付运输；回购收回的旧料加

工成标准金锭，通过上海黄金交易所进行销售，标准金锭均分配唯一编号，所有成品金料均有出库台账记录，包括出库日期、出库重量等，所有经公司审核的出库流向风险可控，因本公司 2023 年下半年取得上海黄金交易所可提供标准金锭供应商资格后，方才逐步试行旧金回购业务，2023 年度回购业务量较低，约 200 公斤，业务量占比仅约为 5%，剩余 95% 业务量均为受托提纯加工。经福建金玉德尚精炼科技有限公司精炼加工的金料大部分流向为珠宝展厅、首饰加工厂，回购旧金提纯铸锭后流向上海黄金交易所。合作期间，各部门合规小组形成良好沟通机制，对于过程中可能出现的风险事件进行及时评估，2023 年期间并未出现零容忍供应链和高风险供应链。

The company has established a set of supply chain traceability system, each batch of raw materials handed over to our company has a ledger record, including the name of the supplier, the date of handover, handover weight, colour and so on. Each batch of finished gold materials processed is different according to the source, the entrusted gold materials need to notify the customer to pick up or deliver for transportation; the old materials recovered from buyback are processed into standard gold ingots and sold through Shanghai Gold Exchange, and the standard gold ingots are assigned with a unique number, and all the finished gold materials are recorded in the outgoing account, including the date of outgoing, the weight of outgoing, etc., and all the outgoing flows audited by the Company are risk controllable, because the Company As the Company has obtained the qualification as a supplier of standard gold ingots from the Shanghai Gold Exchange in the second half of 2023, the Company has gradually implemented the old gold repurchase business on a trial basis, and the volume of repurchase business in FY2023 was relatively low, approximately

200 kilograms, accounting for only approximately 5% of the business volume, and the remaining 95% of the business volume was commissioned for purification and processing. Most of the gold materials refined and processed by Fujian Jinyu Deshang Refining Technology Co., Ltd. flowed to jewellery showrooms and jewellery processing factories, and the repurchased old gold flowed to the Shanghai Gold Exchange after purification and casting of ingots. During the co-operation period, the compliance team of each department formed a good communication mechanism to assess possible risk events in the process in a timely manner, and there was no zero-tolerance supply chain or high-risk supply chain during the year 2023.

在业务开展前，我公司会收集供应商营业执照、资质验证资料、KYC 调查表等资料。每一批次的货物收料、化验单、结算单、银行转账等相关记录保存 5 个财年以上。

Prior to the commencement of business, our company collects information such as suppliers' business licences, qualification verification data, KYC questionnaires, and so on. Records related to each batch of goods received, laboratory tests, billing statements, bank transfers, etc. are kept for more than five fiscal years.

1.4 沟通机制

1.4 Communication mechanisms

1.4.1 培训

1.4.1 Training

公司每年将供应链尽职调查管理培训纳入公司年度培训计划当中，组织公司重点岗位以及合规专员对供应链尽职调查管理的要求，主要基于 LBMA 负责任

黄金指南进行培训，确保供应链尽职调查管理工作落到实处。2023 年我公司共开展了 4 次供应链尽职管理体系相关内容的培训，培训现场通过互动提问的方式，整体达到良好的培训效果。此类培训计划旨在帮助有关员工深入了解《黄金供应链尽职调查管理制度》和相关工具包，包括 LBMA 对黄金的监管要求、可靠黄金供应链尽职调查管理政策和黄金采购流程风险管理（风险预控、风险评估、监控和沟通机制等）。

Every year, the company incorporates supply chain due diligence management training into the company's annual training plan, and organises the company's key positions as well as compliance specialists to train on the requirements of supply chain due diligence management, mainly based on the LBMA Responsible Gold Guidelines, to ensure that the supply chain due diligence management work is put into practice. 2023, our company carried out a total of four supply chain due diligence management system related content training, training site In 2023, we conducted four training sessions on supply chain due diligence management system, and the training sessions were conducted in an interactive manner with questions and answers, which achieved a good overall training effect. This kind of training programme aims to help relevant staff to have a deeper understanding of the Gold Supply Chain Due Diligence Management System and the related toolkit, including the LBMA's regulatory requirements on gold, the reliable gold supply chain due diligence management policy and the risk management of the gold procurement process (risk pre-control, risk assessment, monitoring and communication mechanism, etc.).

1.4.2 内部沟通

1.4.2 Internal communication

合规小组内部每季度至少组织一次季度讨论,就当月的供应链相关信息进行内部通报。沟通事项包括日常尽职调查管理工作内容及评审原料采购部门对于当期合作客户尽职调查工作文件,对于尽调工作开展不完善的供应商进行二次尽调,包括派遣合规专员进行供应商辅导,提高供应商对其上下游的尽职调查能力。

At least once a quarter, a quarterly discussion is organised within the Compliance Team to internally communicate supply chain related information for the month. Communication matters include the content of daily due diligence management work and review of due diligence documents of the raw material procurement department for the current period of cooperation with the customer, conduct secondary due diligence for suppliers whose due diligence work is not carried out properly, including dispatching compliance specialists to provide counselling to suppliers to improve their due diligence capabilities on their upstream and downstream.

公司支持实施采掘业透明度行动计划的倡议,2023 年度期间暂无从支持 EITI 国家运营的国有企业处购买开采的黄金。

The Company supports the initiative to implement the Extractive Industries Transparency Action Plan (EITAP), and for the time being there will be no purchases of mined gold from SOEs supporting EITI state operations during FY2023.

1.4.3 外部沟通

1.4.3 External communication

2023 年我公司定期现场走访供应商客户,向供应商宣讲供应链尽职管理体系相关内容,帮助供应商深入了解《黄金供应链尽职调查管理制度》和相关工具包,包括 LBMA 对黄金的监管要求、可靠黄金供应链尽职调查管理政策和黄金采购流程风险管理(风险预控、风险评估、监控和沟通机制等)。合作期间督促业务

员定期开展尽职调查了解供应商对于供应链尽职管理体系的执行情况,对于不完善的地方予以辅导,对于执行很好的供应商给予更多的合作机会。

In 2023, we regularly visited our supplier customers on site to educate them on the relevant contents of the supply chain due diligence management system and help them gain a deeper understanding of the "Gold Supply Chain Due Diligence Management System" and the relevant toolkit, including the LBMA's regulatory requirements for gold, the Reliable Gold Supply Chain Due Diligence Management Policy and the risk management of the gold purchasing process (risk pre-control, risk assessment, monitoring and communication mechanism) etc.). During the cooperation period, we urge our salespersons to carry out due diligence investigations regularly to understand the implementation of supply chain due diligence management system of the suppliers, and provide counselling for the imperfections, and give more cooperation opportunities to the suppliers with good implementation.

1.5 机密申诉机制

1.5 Confidential complaint mechanisms

公司已制定申诉机制,公司利用官网公布电话和邮箱,允许员工和外部利益相关者表达对供应链或任何新的已识别风险的担忧,对举报人信息保密,在整个申诉过程中保护申诉人的隐私,杜绝任何行为的打击报复。公司内部也设置有举报箱,举报箱由合规风控官定期开箱检查。

The Company has a grievance mechanism in place, with a telephone number and email address published on the Company's website, which allows employees and external stakeholders to express concerns about the supply chain or any new identified risk, keeps the information of the whistleblower confidential, protects the privacy of

the complainant throughout the grievance process, and eliminates any retaliation for any action taken. There is also a whistleblower box within the organisation, which is regularly opened and inspected by the Compliance and Risk Management Officer.

2023 年度我公司未接到员工和外部利益相关者的申诉。

We did not receive any complaints from employees or external stakeholders in FY2023.

第 2 步：识别和评估供应链中的风险

Step 2: Identify and assess risks in the supply chain

合规声明：

Compliance Statement:

我方已完全遵照第 2 步：识别和评估供应链中的风险。

We have fully complied with Step 2: Identify and Assess Risks in the Supply Chain.

2.1 福建金玉德尚精炼科技有限公司具有识别供应链风险的尽职调查流程

2.1 Fujian Jinyudeshang Refinery Tech Co.,Ltd. Limited has a due diligence process to identify supply chain risks

公司严格遵守 LBMA 负责任黄金指南第二步“识别及评估供应链风险”，及经合组织尽职调查指南附件二的要求，并考虑精炼商黄金供应链中的不利 ESG 因素。制定《供应链风险评估表》，明确了判定标准，充分对供应链中的地点、供应商、物料、再生黄金的风险进行识别和评估。

The Company strictly adheres to Step 2 of the LBMA Responsible Gold

Guidelines "Identifying and Evaluating Supply Chain Risks" and Annex II of the OECD Due Diligence Guidance, and takes into account unfavourable ESG factors in the gold supply chain of refiners. A Supply Chain Risk Assessment Form has been developed with clear criteria for identifying and assessing risks to locations, suppliers, materials and recycled gold in the supply chain.

合作前，公司对于所有供应商均进行供应链的尽职管理调查，填写 KYC 问卷，在进行合作前要求合作方提供符合黄金供应链尽职调查管理制度要求的相关资质证明文件，对供应商基本情况、股东信息、提供原料类型、计划精炼贵金属类型、结算方式等信息进行调查，并尽可能地将供应链调查向供应商的上游延伸，对于涉及零容忍供应链、高风险供应链的供应商拒绝合作。

Prior to cooperation, the Company conducts supply chain due diligence management investigations on all suppliers, fills in KYC questionnaires, requests the partners to provide relevant qualification documents in compliance with the requirements of the gold supply chain due diligence management system prior to cooperation, conducts investigations on the basic situation of the suppliers, shareholders' information, types of raw materials supplied, types of precious metals planned to be refined, settlement methods, etc., and extends the supply chain investigations to the upstream of the suppliers as far as possible, and refuses to cooperate with the suppliers that are involved in the zero-tolerance supply chain and the high-risk supply chain.

合作过程中，对于供应商商业活动动态进行了解和评估，不因初级评估的低风险放松警惕，时刻关注每一笔实物流、信息流、资金流是否匹配且合规，建立供应商档案、原料台账。持续对供应商信息进行追踪调查。充分发挥网络

作用，利用天眼查、中国审判信息网、IPE 等网站对供应商资质情况、失信情况、诉讼情况、处罚情况进行查询。2023 年我公司对所有供应商进行了专项尽职调查，2023 年期间未出现高风险客户。

In the course of cooperation, we understand and assess the dynamics of suppliers' business activities, do not relax our vigilance due to the low risk of primary assessment, always pay attention to whether every physical flow, information flow and financial flow is matched and compliant, and establish suppliers' files and raw material ledgers. Continuous tracking and investigation of supplier information. We make full use of the network and use websites such as Tianye Zha, China Trial Information Network and IPE to enquire about suppliers' qualifications, breach of trust, litigations and penalties. 2023 We conducted special due diligence investigations on all our suppliers, and there were no high-risk customers during the year 2023.

以上调查和评估均有合规小组成员参加，从各自负责的领域对于供应商进行评估，由合规风控官进行综合评审，评审结果上报执行董事指定的委员会。

All of the above investigations and evaluations involve members of the Compliance Team, who evaluate the suppliers in their respective areas of responsibility, and the Compliance Risk Officer conducts a comprehensive evaluation, the results of which are reported to the committee appointed by the Executive Director.

2023 年度期间，公司完成所有供应商尽职调查，未发现零容忍供应链和高风险供应链。2023 年度对供应商的调查和评估结果均为低风险。

During FY2023, the Company completed all supplier due diligence and no zero tolerance supply chains or high risk supply chains were identified. The results of the investigations and assessments of suppliers in FY2023 were all low risk.

2.2 识别零容忍供应链和高风险供应链

2.2 Identify zero-tolerance and high-risk supply chains

公司根据《负责任黄金指南》第9版和OECD附件2相关规定，并考虑精炼商黄金供应链中的不利 ESG 因素，制定零容忍供应链和高风险供应链评判标准。风险评判细则涵盖了位置风险、公司风险、原料风险三个维度，位置风险可参考中国政府认可的国际制裁名单、多德—弗兰克法案第1502条、欧盟CAHRA名单、海德堡晴雨表、脆弱国家指数或类似的指数、联合国人权事务高级专员办事处或同等机构、金融行动特别工作组（FATF）的报告（包括相关国家/地区报告）、关于高风险黄金中心/转运中心和高风险洗钱风险国家/地区的可靠市场情报。

The Company has developed criteria for zero tolerance supply chains and high risk supply chains based on the Responsible Gold Guidelines, 9th Edition and OECD Annex 2, taking into account unfavourable ESG factors in a refiner's gold supply chain. The risk judgement rules cover three dimensions: location risk, company risk and raw material risk. Location risk can refer to the international sanctions list recognised by the Chinese government, Section 1502 of the Dodd-Frank Act, the EU CAHRA list, the Heidelberg Barometer, the Fragile States Index or similar, the Office of the United Nations High Commissioner for Human Rights (OHCHR) or the equivalent, the Financial Action Task Force (FATF) Task Force (FATF) reports (including relevant country/region reports), reliable market intelligence on high risk gold centres/transit centres and high money laundering risk countries/regions.

根据《黄金供应链尽职调查管理制度》中规定的零容忍黄金供应链评判标准

进行供应商识别，2023 年度期间我公司采购的黄金没有来自被指定为世界遗产或保护区的地区，没有来自违反国际制裁国家（得到中国政府认可），也不存在供应相对方、其他已知的上游公司或它们的最终受益者是已知的洗钱者、诈骗或恐怖分子，不存在曾涉嫌严重侵犯人权，不存在直接或间接支持非法的非国家武装组织，不存在欺骗性地谎报矿物来源。

Based on supplier identification in accordance with the zero-tolerance gold supply chain judgement criteria set out in the Gold Supply Chain Due Diligence Management System, no gold purchased by our Company during FY2023 was sourced from areas designated as World Heritage Sites or Protected Areas, no gold was sourced from countries that have violated international sanctions (as recognised by the Government of China), no supplying counterparties, other known upstream companies, or their ultimate beneficiaries, are known money launderers, scammers, or terrorists, have been suspected of committing serious human rights abuses, are not supporting, either directly or indirectly, illegal, non-State armed organisations, or are deceitfully misrepresenting the source of their minerals.

根据《黄金供应链尽职调查管理制度》中规定回收金的高风险判断标准，从位置、供应商和原料三个角度进行风险评估及现场调查，2023 年度期间并未发现回收金高风险供应链。

In accordance with the high risk judgement criteria for recovered gold set out in the Gold Supply Chain Due Diligence Management System, risk assessments and on-site investigations were conducted from three perspectives, namely location, suppliers and raw materials, and no high risk supply chain for recovered gold was

identified during FY2023.

综上，2023 年度期间未发现零容忍供应链和高风险供应链，所有采购有序合规进行。

In summary, no zero-tolerance supply chains or high-risk supply chains were identified during FY2023, and all procurement was conducted in an orderly and compliant manner.

2.3 关于强化尽职调查的说明

2.3 Note on enhanced due diligence

2023 年度期间公司供应链未出现高风险供应链，所以未触发强化尽职调查。

There were no high-risk supply chains in the Company's supply chain during FY2023, so enhanced due diligence was not triggered.

公司从严控供应链风险出发，在合规风控官的带领下，合规小组就有具体营业场地的供应商进行了实地考察，考察内容包括：业务类型、材料类型、来源地说明、运输方式、上游客户类型、交易支付方式等。

Starting from the strict control of supply chain risks, under the leadership of the Compliance Risk Control Officer, the Compliance Team conducted on-site inspections on suppliers with specific business premises, which included: type of business, type of materials, description of the place of origin, mode of transport, type of upstream customers, and mode of payment for the transaction, etc. The

Compliance Team also conducted on-site inspections on suppliers with specific business premises.

第 3 步：设计并实施管理策略，应对已识别的风险

Step 3: Design and implement management strategies to address identified risks

合规声明：

Statement of Compliance:

我方已完全遵照第 3 步：设计和实施管理策略，应对已识别的风险。

We have fully complied with Step 3: Design and implement management strategies to address identified risks.

3.1 福建金玉德尚精炼科技有限公司通过以下三种方式进行风险管理

3.1 Fujian Jinyudeshang Refinery Tech Co.,Ltd. conducts risk management in the following three ways

3.1.1 确认终止关系，规避风险

3.1.1 Acknowledgement of termination and risk avoidance

如果增强型尽职调查或通过实地调查和其他信息综合评估发现供应商存在参与洗钱、恐怖活动融资、严重侵犯人权、直接或间接支持非法的非国家武装组织以及对黄金来源进行欺骗性虚假陈述的线索，公司应立即与供应商终止合作。对于终止合作的供应商，公司应根据国内外适用的法律要求，向有关部门和 LBMA （如适用） 报告此类情况。

If enhanced due diligence or comprehensive assessment through field

investigations and other information reveals that the supplier has clues of involvement in money laundering, financing of terrorist activities, serious violations of human rights, direct or indirect support for illegal non-state armed organisations, and deceptive misrepresentation of the source of the gold, the Company shall terminate cooperation with the supplier immediately. For suppliers whose cooperation has been terminated, the Company shall report such cases to the relevant authorities and the LBMA (if applicable) in accordance with the applicable legal requirements at home and abroad.

3.1.2 确认暂停关系，在暂停交易的同时降低风险

3.1.2 Confirmation of the suspension relationship to mitigate risk while suspending transactions

如果增强型尽职调查有理由怀疑供应商存在参与洗钱、恐怖活动融资、严重侵犯人权、直接或间接支持非法的非国家武装组织、对黄金来源进行欺骗性虚假陈述以及灾难性的 ESG 影响情况，公司应暂缓从供应商处采购含金物料，直到获取更多的信息和证据。供应商提供了反驳初步怀疑的补充信息/数据，或对解决环境、社会和管理问题的影响作出了及时和适当的反应，经过合规风控官批准后冶炼工作就可以恢复进行。

If Enhanced Due Diligence has reason to suspect that a supplier is involved in money laundering, terrorist financing, serious human rights abuses, direct or indirect support to illegal non-state armed organisations, deceptive misrepresentation of the source of the gold, and catastrophic ESG impacts, the company should withhold procurement of gold-bearing materials from the supplier until more information and evidence is available. If the supplier provides additional information/data to refute the

initial suspicion or responds in a timely and appropriate manner to address the ESG impacts, smelting may be resumed with the approval of the Compliance Risk Officer.

3.1.3 确认保持与改进计划的关系，在继续交易的同时降低风险

3.1.3 Confirmation of maintaining the relationship with the improvement plan to mitigate risk while continuing to trade

如果增强型尽职调查未发现潜在问题或存在少量问题，包括贿赂、对黄金来源的非欺骗性错误陈述、不遵守政府规定的税收、费用和特许使用费政策、严重违反环境、卫生、安全、劳工和与社区有关的地方立法，以及/或极有可能造成高度不利影响的环境、社会和管理问题风险，供应商能提供包含明确改进计划和时间表的风险解决方案，并经公司合规小组评审、合规风控官批准后，公司可以与该供应商开展正常合作关系。风险解决方案应包含明确绩效目标、基于定量和定性分析的绩效评估指标和合理地完成日期。

If Enhanced Due Diligence does not identify potential issues or a small number of issues, including bribery, non-deceptive misrepresentations about the source of the gold, non-compliance with government-mandated tax, fee and royalty policies, serious breaches of environmental, health, safety, labour and community-related local legislation, and/or risks of environmental, social and regulatory issues that have a high likelihood of high levels of adverse impacts, the supplier is able to provide A risk solution that includes a clear improvement plan and timetable, which has been reviewed by the Company's Compliance Team and approved by the Compliance Risk Officer, allows the Company to enter into a normal working relationship with that supplier. The risk solution should include clear performance objectives, performance evaluation metrics based on quantitative and qualitative analyses, and reasonable

completion dates.

3.2 风险管理策略

3.2 Risk management strategies

3.2.1 监控改进计划

3.2.1 Monitoring Improvement Plan

采用诚信的原则，对交易相对方采取可衡量步骤、业绩监测、定期重新评估风险并向委员会报告。

Adoption of the principle of good faith, measurable steps for counterparties, performance monitoring, periodic reassessment of risks and reporting to the Committee.

风险监测至少应在开始实施改进计划的六个月内，确定消除风险的重大和可衡量的改进措施。根据六个月取得的进展，在修订后的改进计划中规定附加措施。正式评估绩效，以确定在截止日期前措施已得以适当实施（如通过独立审计、后续现场访问或远程审查）。

Risk monitoring should identify significant and measurable improvements to eliminate risks at least within six months of the start of the improvement plan. Based on progress made in the six months, additional measures are specified in a revised improvement plan. Formally assess performance to determine that measures have been properly implemented by the deadline (e.g., through independent audits, follow-up site visits, or remote reviews).

为促进监测活动，酌情咨询利益相关者，如地方政府机构、上游公司、国际

或公民社会组织，以及受影响的第三方，充分发挥网络作用。

To facilitate monitoring activities, stakeholders such as local government agencies, upstream companies, international or civil society organisations, as well as affected third parties, are consulted as appropriate, making full use of networks.

在改进关系确立的 6 个月时间段之后，当改进有限或没有可测量的改进予以证明时，暂停合作关系，直到供应商响应改进计划。在降低风险和改善表现的尝试失败后终止关系。

After the six-month time period in which the improvement relationship has been established, when improvements are limited or not evidenced by measurable improvements, the relationship is suspended until the supplier responds to the improvement plan. Terminate the relationship after attempts to reduce risk and improve performance have failed.

根据 2023 年的尽职调查结果，并未出现供应商需要进行风险缓解的管理策略。所有供应商合作关系都是持续而良好的合作关系，并未出现终止、暂停关系的情形。

Based on the results of the 2023 due diligence survey, there were no management strategies for suppliers that required risk mitigation. All supplier partnerships are ongoing and good relationships, and there have been no instances of termination or suspension of relationships.

3.2.2 定期重新评估与持续监控，以确保有效的风险管理

3.2.2 Periodic reassessment and continuous monitoring to ensure effective risk management

交易部负责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。

The Transactions Department is responsible for collecting all changes to supplier information, continuously monitoring transaction results and conducting annual supply chain due diligence reassessments to determine continued co-operation.

采购的每一批次的黄金原料在运输、出入库、生产、付款过程都有合规专员的监控,其中入库必须有福建金玉德尚精炼科技有限公司物流合规专员审核,出库须有福建金玉德尚精炼科技有限公司物流合规专员签字确认,付款必须有财务的福建金玉德尚精炼科技有限公司合规专员及合规风控官的批准。

Each batch of gold raw materials purchased is monitored by the Compliance Officer during the transportation, warehousing, production and payment processes, in which warehousing must be audited by the Logistics Compliance Officer of Fujian Jade Deschamps Refining Technology Co., Ltd, warehousing must be confirmed by the signature of the Logistics Compliance Officer of Fujian Jade Deschamps Refining Technology Co., Ltd, and payment must be approved by the Compliance Officer of Fujian Jade Deschamps Refining Technology Co., Ltd of finance and the Compliance Risk Officer.

3.2.3 定期报告

3.2.3 Periodic reports

每季度合规风控官根据福建金玉德尚精炼科技有限公司黄金供应链尽职管理的实际情况,向执行董事指定的委员会提交报告。报告本季度福建金玉德尚精炼科技有限公司黄金供应链尽职管理体系运行情况进行总结,提出不足及改进措施。

Every quarter, the Compliance and Risk Control Officer submits a report to the

committee appointed by the Executive Director based on the actual situation of the due diligence management of the gold supply chain of Fujian Jade Deshaun Refining Technology Co. The report summarises the operation of the gold supply chain due diligence management system of Fujian Jade De Shang Refining Technology Company Limited during the quarter and proposes deficiencies and improvement measures.

2023 年，福建金玉德尚精炼科技有限公司采取了量化的手段对供应商进行评分管理，对除新供应商外的所有供应商进行年度补充风险评估。合规风控官已对评估结果进行审核。合规风控官每季度向执行董事指定的委员会提交了报告。

In 2023, Fujian Jinyu Deshan Refining Technology Co. Ltd. adopted a quantitative means of scoring and managing its suppliers, and conducts an annual supplemental risk assessment of all suppliers except new suppliers. The Compliance Risk Control Officer has reviewed the assessment results. The Compliance Risk Control Officer has submitted quarterly reports to the committee appointed by the Executive Directors.

第 4 步：安排对供应链尽职调查的独立第三方审计

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

合规声明：

Statement of Compliance:

我方已完全遵照第 4 步：安排对供应链尽职调查进行独立的第三方审计。

We have fully complied with Step 4: Arrange for an independent third party audit of supply chain due diligence.

福建金玉德尚精炼科技有限公司聘请了必维检验认证集团上海分公司作为

担保人。其按照国际标准在鉴证业务中执行了合理鉴证业务，即 ISAE3000 鉴证业务，但历史财务信息审计或审查除外（ISAE3000）。必维的鉴证报告见附件。

Fujian Jinyu Deshang Refining Technology Co., Ltd. hired Bureau Veritas Certification Group Shanghai as a guarantor. It performed reasonable assurance engagements in accordance with international standards in assurance engagements, namely ISAE3000 assurance engagements, except for audits or reviews of historical financial information (ISAE3000). The Bureau Veritas assurance report is attached.

审计报告将在年度审计完成后在公司官网予以公布。

The audit report will be published on the company's website after the completion of the annual audit.

第 5 步：供应链尽职调查报告

Step 5: Supply chain due diligence report

合规声明：

Statement of Compliance:

我方已完全遵照第 5 步：供应链尽职调查报告。

We have fully complied with Step 5: Supply Chain Due Diligence Report.

为配合《LBMA 负责任黄金指南》的具体要求，福建金玉德尚精炼科技有限公司按时编制并上报《2023 年可持续发展与负责任采购合规报告》。

In line with the specific requirements of the LBMA Responsible Gold Guidelines, Fujian Jinyu Deschamps Refining Technology Co., Ltd. prepared and submitted the 2023 Sustainability and Responsible Sourcing Compliance Report on time.

其他利益相关者可通过电话和电子邮件与我方联系，以获得一份《2023 年

可持续发展与负责任采购合规报告》，或通过公司官网下载获取。

Other stakeholders can contact us by phone and email to receive a copy of the Sustainability and Responsible Sourcing Compliance Report 2023 or download access to it via the company's official website.

四、结论

IV. Conclusion

总体而言，2023 年福建金玉德尚精炼科技有限公司完善了黄金供应链尽职管理体系，识别和评估了供应商的相关风险，设计并实施了风险管理策略，对供应链尽职调查进行了独立的第三方审计。因此，在截至 2023 年 12 月 31 日，福建金玉德尚精炼科技有限公司完全遵守《LBMA 负责任黄金指南》。

Overall, in 2023, Fujian Jinyu Deshang Refining Technology Co., Ltd. improved its gold supply chain due diligence management system, identified and assessed the risks associated with its suppliers, designed and implemented risk management strategies, and conducted independent third-party audits of its supply chain due diligence. Therefore, as at 31 December 2023, Fujian Jinyu Deshang Refining Technology Co., Ltd. was in full compliance with the LBMA Responsible Gold Guidelines.

在下一阶段的工作中，我方将致力于持续改进，以更有效地将负责任采购理念及负责任尽职调查流程融入公司内部管理制度、程序、流程和实践。将定期在内部对任何已确定的纠正措施进行监控。

In the next phase of our work, we will aim for continuous improvement to more effectively integrate the responsible sourcing philosophy and responsible due diligence process into our internal management systems, procedures, processes and

practices. Any identified corrective actions will be monitored internally on a regular basis.

五、其他报告意见

v. other reporting comments

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