

福建金玉德尚精炼科技有限公司  
**Fujian Jinyudeshang Refinery Technology Co.,Ltd.**

2024 年度  
黄金供应链尽职调查合规报告  
**Gold Supply Chain Due Diligence Compliance Report 2024**

精炼厂名称：福建金玉德尚精炼科技有限公司

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

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报告负责人：陈佳鑫/合规总监

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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，注册地址位于中国福建省福州市长乐区鹤上镇珠宝创意园999号。公司实际控制方为中国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的研发、生产和销售，并开展黄金饰品售后维修和回购等业务。公司严格遵循LBMA负责任黄金指南及OECD尽职调查框架，确保供应链的合规性与可追溯性，为全球贵金属市场提供高标准、高纯度的精炼产品。

Fujian Jinyu Deshang Refinery Technology Co., LTD. (hereinafter referred to as "the Company") was established in September 2009, with a registered capital of 150 million yuan. Its unified social credit code is 91440300693994086C, and its registered address is No. 999, Jewelry Creative Park, Heshang Town, Changle District, Fuzhou City, Fujian Province, China. The actual controller of the company is Decent Jewelry Group Co., LTD. (hereinafter referred to as "the Group"), a leading enterprise in China's gold and jewelry industry. The Group mainly engages in the research and development, production and sales of gold refining, gold and jewelry, investment gold bars and gold handicrafts, and also conducts after-sales repair and repurchase of gold jewelry and other businesses.

公司拥有黄金湿法精炼生产线一套，配备领先的精炼设备，并拥有经验丰富、技术精湛的专业团队。工厂采用自动化生产流程，同时实施严格的环保管理体系，专注于黄金资源的高效回收利用，并实现生产废水零排放，确保精炼工艺的环保性与环境的可持续性。公司运用先进的精炼及检测技术，构建符合国际标准的黄金产业循环经济体系。已通过质量（ISO9001：2015）、环境（ISO14001：2015）、职业健康安全（ISO45001：2018）三体系认证，充分彰显了公司在环保制造、社会责任及绿色生产方面的领先地位与坚定承诺。

The company operates a gold wet refining production line equipped with advanced refining facilities and boasts a professional team with extensive expertise and technical proficiency. The factory employs automated production processes while implementing a stringent environmental management system, focusing on the efficient recycling of gold resources and achieving zero discharge of production wastewater to ensure the environmental sustainability of the refining process.

Utilizing cutting-edge refining and testing technologies, the company has established a gold industry circular economy system that meets international standards. It has obtained certifications in Quality (ISO 9001:2015), Environment (ISO 14001:2015), and Occupational Health & Safety (ISO 45001:2018), fully demonstrating its leading position and firm commitment to eco-friendly manufacturing, social responsibility, and green production.

公司自2023年开展业务以来，已实现年提纯黄金超10吨的规模化生产能力，生产体系稳定可靠，全程符合国际精炼规范与合规要求，保障产品纯度与品质的

绝对优势。通过搭建全流程供应链尽职调查管理体系，结合先进的提纯及检测技术，公司持续产出达到上海黄金交易所优质交割标准（Good Delivery）的贵金属产品。产品线覆盖多样化形态与规格，精准适配全球市场对高规格、可溯源贵金属的核心需求。

Since commencing operations in 2023, the company has achieved an annual gold refining capacity exceeding 10 tons, with a stable and reliable production system that fully complies with international refining standards and regulator requirements, ensuring absolute superiority in product purity and quality. By establishing a comprehensive supply chain due diligence management system and leveraging advanced refining and testing technologies, the company consistently produces precious metal products that meet the Shanghai Gold Exchange's Good Delivery standards. Its diversified product line spans various forms and specifications, precisely catering to the global market's core demand for high-standard, traceable precious metals.

2023年10月，本公司成功获得“上海黄金交易所可提供标准金锭企业”认证资格，2023年12月12日，上海黄金交易所为本公司颁发认证证书，我们成为中国福建省福州地区第一家可提供标准金锭的黄金精炼企业。

2024年度我们荣获上海黄金交易所市场单项业务荣誉：年度最佳可提供标准金锭企业之一（共13家）。

In October 2023, our company successfully obtained the certification qualification of "Shanghai Gold Exchange Standard Gold Ingot Supplier." On December 12, 2023, the Shanghai Gold Exchange officially awarded us the certification, making us the first gold refining enterprise in Fuzhou, Fujian Province, capable of supplying standard gold ingots.

In 2024, we were honored with a market-specific business award from the Shanghai Gold Exchange: one of the "Best Standard Gold Ingot Suppliers of the Year" (selected from 13 companies).

## 二、供应商概况

### II. Overview of suppliers

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、金锭、金条和生产环节所产生的边角料。客户主要为集团下属制造工厂、批发展厅以及长期合作的品牌方。公司全面贯彻LBMA负责任黄金指南，从供应链源头落实合法性审查与全流程追溯机制，通过尽职调查管理体系甄选合作伙伴，确保供应商资质、原料来源及交易行为均满足LBMA的要求。

The company's gold raw materials primarily consist of customer-entrusted old gold for refining and recycled gold collected from the public, mainly in the form of used jewelry. The product forms include old ornaments, damaged jewelry, gold ingots, gold bars, and production scrap.

Our key clients comprise manufacturing facilities and wholesale showrooms under the Group, as well as long-term cooperative brand partners. The company fully

adheres to the LBMA Responsible Gold Guidance, implementing legality verification and end-to-end traceability mechanisms from the supply chain source. Through a rigorous due diligence management system, we meticulously select partners to ensure that supplier qualifications, material origins, and transaction practices all comply with LBMA requirements.

### 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。

第 1 步：建立强大的公司管理体系

#### Step 1: Establish a strong company management system

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合规声明：

#### Compliance Statement with Requirement:

我方已完全遵照第 1 步：建立强大的公司管理体系。

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

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#### 1.1 黄金供应链尽职调查政策

#### 1.1 Gold Supply Chain Due Diligence Policy

2024 年，公司依据 OECD 指南及 LBMA 最新版 RGG (V9) 对现行政策进行了全面复核和更新，确认现有政策符合最新标准。根据政策要求，公司进一步优化了供应链尽职调查体系、质量控制流程及市场合规机制，以满足《合格交割规则》和《合格交割申请程序》的最新规定。最新的《黄金供应链尽职调查管理政策》严格依据经济合作与发展组织 (OECD) 《关于来自受冲突影响和高风险地区矿石的负责任供应链尽职调查指南》附录 II 的全部规范要求，并将合规范围延伸至反恐怖主义融资 (CTF)、环境 (E)、社会 (S) 及治理 (G) 等核心领域。该政策经公司合规总监审批后，以中英双语形式正式发布并在公司官网 <http://www.houdejin.com/> 公开公示。2024 年公司对政策再次进行传达、宣导，要求全体员工及供应商全面理解并严格执行政策规定，同时实施供应商承诺书签署机制，所有的传达记录均已被存档保存，确保供应链各环节责任落实到位。

In 2024, the company conducted a comprehensive review and update its existing policies in accordance with the OECD Guidelines and the latest version of LBMA's Responsible Gold Guidance (RGG V9), confirming that the current policies align with the most recent standards.

In line with policy requirements, the company further optimized its supply chain due diligence system, quality control procedures, and market compliance mechanisms

to meet the latest stipulations of the Good Delivery Rules and Good Delivery Application Procedures. The updated Gold Supply Chain Due Diligence Management Policy strictly adheres to all specifications outlined in Appendix II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, while extending compliance coverage to core areas such as Counter-Terrorist Financing (CTF), Environmental (E), Social (S), and Governance (G) standards.

Approved by the company's Chief Compliance Officer, the policy was officially released in both Chinese and English and publicly disclosed on the company's website (<http://www.houdejin.com/>). In 2024, the company reinforced the policy through internal communication and training, requiring all employees and suppliers to fully understand and rigorously implement its provisions. A supplier commitment letter signing mechanism was also instituted, with all communication records archived to ensure accountability at every stage of the supply chain.

公司政策明确要求公司及所有供应商全面遵守国家法律法规，重点落实员工权益保障、环境保护及公平交易等核心领域的合规要求，并严格执行供应链尽职调查管理政策，确保矿产金与再生金的采购全程符合伦敦金银市场协会（LBMA）的尽职调查标准。2025年，公司将重点推进黄金供应链完整性数据库的合规化对接工作，强化供应链的可追溯性与透明度建设，同时积极适应精炼厂主动监控机制及交割标准的最新调整。所有政策优化工作均由合规委员会统筹实施，确保公司运营持续满足LBMA和OECD的各项合规要求。

The company's policy explicitly requires both the company and all suppliers to fully comply with national laws and regulations, with a focus on meeting compliance requirements in core areas such as employee rights protection, environmental conservation, and fair trade. Additionally, the policy mandates strict adherence to the Supply Chain Due Diligence Management Policy to ensure that the procurement of mined and recycled gold fully complies with the due diligence standards of the London Bullion Market Association (LBMA). In 2025, the company will prioritize the compliance-oriented integration of a gold supply chain integrity database, enhancing traceability and transparency across the supply chain. It will also proactively adapt to the latest refinements in refinery active monitoring mechanisms and delivery standards. All policy optimization initiatives will be overseen by the Compliance Committee to ensure the company's operations continuously meet LBMA and OECD compliance requirements.

### 环境、社会责任和治理（ESG）因素

#### Environmental, Social responsibility and Governance (ESG) Factors

公司充分遵守当地政府的环境、健康、安全和劳工法规及政策。

The company strictly complies with local government regulations and policies on environmental protection, health, safety, and labor.

环境方面：公司建立了环境管理体系，并获得了 ISO14001 的有效证书。制定了环境管理手册和计划来管理公司生产和运营中的环境风险，特别是对空气，水和土地污染的管理。

**Environmental Protection:**

The company has established an environmental management system and holds a valid ISO 14001 certification. It has developed an environmental management manual and plans to address environmental risks arising from production and operations, with a particular focus on managing air, water, and soil pollution.

劳动保护方面：公司建立了职业健康安全管理体系，并获得了 ISO45001 的有效证书。制定了对员工职业健康及安全的管理细则，并对过程进行监督检查，以保护员工的权益。

**Labor Protection:**

The company has implemented an occupational health and safety management system and holds a valid ISO45001 certification. Detailed management rules have been formulated to safeguard employees' occupational health and safety, with regular supervision and inspections conducted to ensure employee rights are protected.

在劳工法规方面：公司建立了《关于劳动者保护相关社会责任行为的要求和声明》并公布于网站，网址链接：<http://www.houdejin.com/> 公司禁止任何侵犯人权的行为（包括使用童工，强迫性劳动、使用任何酷刑或不人道待遇及广泛性暴力及其他严重侵犯人权的行为；明令规定了禁止扣押员工身份证件、收取押金或抵押物、扣押工资、强迫搜身、限制工人出入工厂和强迫加班等行为，也不支持任何形式的强迫劳动，包括抵债、奴役、或以惩罚或恐吓手段的、非自愿的劳动；并明确定义了员工工作时间，薪酬和奖励制度。

针对供应商，公司要求供应商遵守注册地及经营所在国家/地区的所有适用的关于劳动者保护的法律法规和 LBMA 关于人权的要求，以此作为与福建金玉德尚精炼科技有限公司合作的前提条件。公司要求合规部每年以培训或电话沟通等方式对供应商《关于劳动者保护相关社会责任行为的要求和声明》的执行情况进行和监督。

The company has formulated and publicly disclosed its "Requirements and Declaration on Social Responsibility for Labor Protection" on its official website (<http://www.houdejin.com/> ). This policy strictly prohibits all forms of human rights violations, including: child labor, forced labor, torture, inhuman treatment, widespread violence and other serious human rights abuses. It explicitly bans practices such as confiscating employee identity documents, collecting deposits or collateral, withholding wages, conducting forced body searches, restricting worker mobility, and imposing compulsory overtime. The company does not tolerate any form of forced labor, whether through debt bondage, slavery, or involuntary work under threat or coercion. Furthermore, the policy clearly defines employee working hours, compensation structures and incentive systems.

For suppliers, compliance with all applicable labor protection laws and regulations in

their jurisdictions, as well as LBMA's human rights requirements, serves as a mandatory precondition for cooperation with Fujian Jinyudeshang Refinery Technology Co., Ltd. The company's Compliance Department conducts annual reviews through training or telephone to monitor supplier implementation of these labor protection requirements.

在商业诚信和道德规范管理方面：公司支持实施采掘业透明度行动计划的倡议并在培训期间传达给供应商。

In terms of business integrity and ethical standards management, the company actively supports and promotes the implementation of the Extractive Industries Transparency Initiative (EITI), communicating this commitment to suppliers during training sessions.

公司建立了 EITI (采掘业透明度倡议) 原则及标准, 并承诺遵守 EITI (采掘业透明度倡议) 的原则。

The company has established principles and standards aligned with EITI guidelines and has made a formal commitment to uphold these principles.

公司建立了《反洗钱反恐怖主义融资规章制度》、《反贿赂管理程序》，涵盖客户尽职调查、交易监控、风险评估和可疑交易报告机制, 并定期根据金融行动特别工作组 (FATF)、LBMA 及相关监管机构的要求进行审查和更新, 以确保持续合规并维护全球金融体系的完整性。

Additionally, the company has implemented comprehensive policies including the "Anti-Money Laundering and Counter-Terrorist Financing Regulations" and the "Anti-Bribery Management Procedures." These policies encompass customer due diligence, transaction monitoring, risk assessment, and suspicious transaction reporting mechanisms. To ensure ongoing compliance and uphold the integrity of the global financial system, these policies are regularly reviewed and updated in accordance with the requirements of the Financial Action Task Force (FATF), LBMA, and other relevant regulatory bodies.

## 1.2. 建立管理架构

### 1.2 Establish a management structure

#### 1.2.1 规章制度

##### 1.2.1 Rules and regulations

公司根据《负责任黄金指南》第 9 版制订了《黄金供应链尽职调查管理手册》、《黄金供应链尽职调查管理政策》及其他相关程序文件, 该程序文件建立了系统化的供应链尽职调查管理结构, 明确规定管理架构和职责分工。管理架构由董事会任命合规委员会、合规总监、合规官及合规专员; 在此基础上, 公司建立了涵盖高风险供应链的识别及评估、调查程序、风险应对措施、交易监控流程及文件

保存等要求的完整机制。该制度经由合规总监批准后正式发布实施，并纳入公司文件管理体系，确保各项要求得到有效执行和持续合规。

The company has formulated the Gold Supply Chain Due Diligence Management Manual, Gold Supply Chain Due Diligence Management Policy, and other relevant procedural documents in accordance with the Responsible Gold Guidance (Version 9). These documents establish a systematic supply chain due diligence management framework, clearly defining the organizational structure and division of responsibilities. The management structure consists of a Compliance Committee, Chief Compliance Officer, Compliance Officers, and Compliance Specialists, all appointed by the Board of Directors.

Building upon this foundation, the company has implemented a comprehensive mechanism covering high-risk supply chain identification and assessment, investigation procedures, risk mitigation measures, transaction monitoring processes, and documentation retention requirements. This system was officially implemented upon approval by the Chief Compliance Officer and has been integrated into the company's document management system to ensure effective execution and ongoing compliance with all requirements.

### 1.2.2 职责与权限

#### 1.2.2 Responsibilities and Authorities

经董事会任命的合规委员会设置了合规总监、合规官及合规专员岗位，以确保供应链尽职调查的有效执行与持续合规。

The Compliance Committee, appointed by the Board of Directors, has established positions including Chief Compliance Officer, Compliance Officers, and Compliance Specialists to ensure the effective implementation and ongoing compliance of supply chain due diligence.

合规总监（由公司总经理担任）：作为供应链尽职调查体系的核心管理者，全面负责公司黄金供应链尽职调查工作，包括尽职调查体系的建设与监督、及时审查黄金供应链尽职调查过程和系统，以满足 RGG 的目标和公司自身的风险管理需求，确保公司供应链管理严格遵循 LBMA 负责任采购准则。主要职能涵盖：组织建立、审核批准、监督宣贯及落实-黄金供应链尽职调查管理体系文件；确保合规官获得足够的资源（包括能力和经验），以支持供应链尽职调查系统的运行和监控。

**The Chief Compliance Officer (held by the company's General Manager)** serves as the core manager of the supply chain due diligence system, overseeing all aspects of the company's gold supply chain due diligence efforts. This includes the development and supervision of the due diligence framework, as well as the timely review of supply chain due diligence processes and systems to meet the objectives of the Responsible Gold Guidance (RGG) and the company's own risk management requirements. The primary responsibilities encompass organizing the establishment,

reviewing, approving, disseminating, and implementing the documentation for the gold supply chain due diligence management system. Additionally, the Chief Compliance Officer ensures that Compliance Officers are provided with sufficient resources, including necessary capabilities and experience, to support the operation and monitoring of the supply chain due diligence system.

合规官（由合规专家担任）：合规官负责供应链尽职调查具体执行层面的工作，其工作内容包括：《黄金供应链尽职调查管理手册》、《黄金供应链尽职调查政策》等体系文件的组织制定、宣贯及培训，收集并验证供应商 KYC 信息，识别供应链风险并组织对高风险进行加强型尽调，审核各部门汇报信息并组织管理评审会议，汇报管理评审报告给合规总监；

**The Compliance Officer (held by a compliance specialist)** is responsible for the practical execution of supply chain due diligence. Key duties include organizing the formulation, dissemination, and training related to system documents such as the Gold Supply Chain Due Diligence Management Manual and the Gold Supply Chain Due Diligence Policy. The Compliance Officer also collects and verifies supplier KYC information, identifies supply chain risks, and organizes enhanced due diligence for high-risk cases. Furthermore, this role involves reviewing information reported by various departments, coordinating management review meetings, and submitting management review reports to the Chief Compliance Officer.

运营部-合规专员：负责收集供应商信息并对信息进行初步筛选和评估，监督与合格供应商的交易及事后评估；收集并保存足够的黄金供应链尽职调查文件，负责合同的传达、审批及签署；

**Operations Department - Compliance Specialist:** Responsible for collecting supplier information, conducting preliminary screening and evaluation, monitoring transactions with qualified suppliers, and performing post-transaction assessments. This role also involves gathering and maintaining comprehensive documentation for gold supply chain due diligence, as well as handling the communication, approval, and signing of contracts.

交易部-合规专员：负责和供应商沟通并确认材料类型及交易价格；核实供应商交易合同；

**Trading Department - Compliance Specialist:** Tasked with communicating with suppliers to confirm material types and transaction prices, as well as verifying supplier transaction contracts to ensure compliance with established standards.

物流部-合规专员：负责确认供应商来料的运输方式及物流跟踪；接洽原料进入精炼厂或离开精炼厂，核实并记录每一批收到的物料信息，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，保存物料交接凭证，核验物料的标识和贮存；

**Logistics Department - Compliance Specialist:** Oversees the transportation methods and logistics tracking of supplier materials. This role manages the receipt

and dispatch of materials at the refinery, verifying and documenting details such as supplier name, origin, material type, transfer date, weight, and purity for each batch. Additionally, the specialist maintains material handover records and verifies labeling and storage conditions.

检测部-合规专员：负责对每一批输入/输出的黄金物料进行化验和检测，并出具和保存化验报告单据，如遇到检测异常将立即向合规官汇报；

**Testing Department - Compliance Specialist:** Conducts chemical analysis and testing for every batch of incoming/outgoing gold materials, generating and retaining assay reports. Any anomalies detected during testing must be immediately reported to the Compliance Officer.

财务部-合规专员：负责供应商委托提纯和回购业务的合同审批，从财务专业的角度评估供应商财务状况厘清其商业关系目的和本意信息；负责对账务往来进行合规监督，禁止任何现金交易；需特别关注大笔资金的流动，保存所有财务相关凭证及票据至少 10 个财年；

**Finance Department - Compliance Specialist:** Handles contract approvals for supplier-commissioned refining and buyback services, assessing supplier financial conditions to clarify business intent and relationships from a professional financial perspective. This role also enforces compliance in financial transactions, strictly prohibiting cash payments, with particular attention to large fund movements. All financial documents and records must be retained for a minimum of 10 fiscal years.

综合部-合规专员：负责配合合规官执行所有黄金供应链相关的尽职调查工作，向供应商宣传黄金供应链尽职调查管理政策等资料并书面确认遵守相关的规定；配合合规官进行内外部培训并保存培训记录和培训总结；

**General Affairs Department - Compliance Specialist:** Responsible for assisting the Compliance Officer in executing all gold supply chain-related due diligence tasks. This includes communicating the company's Gold Supply Chain Due Diligence Management Policy to suppliers and obtaining written confirmation of their compliance with relevant regulations. The specialist also supports the Compliance Officer in organizing both internal and external training sessions, while maintaining comprehensive training records and summaries for documentation purposes.

**培训：**2024 年公司根据管理评审的要求，制定了《年度培训计划》，2024 年合规官共组织 3 次内部培训：3 月 26 日组织合规委员会 8 人就《LBMA 负责任黄金指南》第九版进行培训；8 月 15 日组织全员对《黄金供应链尽职调查管理手册》和尽职调查实操技能进行培训；12 月 18 日组织合规委员会 8 人就风险识别和风险评估资源的使用进行培训。培训现场合规小组成员提出各自所遇到和疑惑的问题，合规官组织大家现场探讨和解答，在答疑结束后通过现场抽查的形式确认培训效果，以保证参与培训人员都了解及掌握。3 次培训时长为 24 小时，培训及评价记录均留档保存。

**Training:** In 2024, the company developed its Annual Training Plan in

accordance with management review requirements. Throughout the year, the Compliance Officer organized 3 internal training sessions to enhance compliance awareness and operational capabilities. On March 26, all eight members of the Compliance Committee participated in a training session focused on the LBMA Responsible Gold Guidance (Version 9). Subsequently, on August 15, all employees received instruction on the Gold Supply Chain Due Diligence Management Manual and practical due diligence skills. The final session took place on December 18, where all eight Compliance Committee members were trained on risk identification techniques and the utilization of risk assessment resources.

During the training sessions, members of the compliance team raised questions regarding challenges and uncertainties they encountered in their work. The Compliance Officer facilitated on-site discussions to address these queries, ensuring comprehensive understanding. To verify training effectiveness, spot checks were conducted immediately after each session to confirm participants' comprehension and mastery of the material. Collectively, these three training sessions spanned 24 hours, with all training materials and evaluation records systematically archived for future reference and compliance verification.

公司建立了合规责任问责制度，以保障合规官及合规专员切实履行其职责。通过建立常态化的监督机制、定期检查制度以及内部报告体系，并纳入 KPI 指标进行考核。公司有效确保供应链尽职调查工作的规范实施，防范潜在的高风险交易。同时，通过定期向高级管理层提交工作报告并组织召开专项合规会议，持续完善和提升供应链管理体系的运作效能。

The company has established a compliance accountability system to ensure that Compliance Officers and Compliance Specialists effectively fulfill their responsibilities. Through the implementation of routine supervision mechanisms, regular inspection protocols, and an internal reporting framework, all incorporated into KPI assessments, the company guarantees the standardized execution of supply chain due diligence while mitigating potential high-risk transactions. Additionally, by submitting periodic work reports to senior management and convening dedicated compliance meetings, the company continuously refines and enhances the operational efficiency of its supply chain management system.

2025 年 1 月 3 日，公司对 2024 年度黄金供应链尽职调查管理体系开展了管理评审工作，形成正式评审报告并汇报至合规总监。该评审报告作为关键决策依据，将指导公司供应链尽职调查体系的规范运作，确保供应链管理持续符合 LBMA 标准及 OECD 尽职调查指南要求，同时推动管理体系不断完善与合规水平持续提升。

On January 3, 2025, the company conducted a management review of its 2024 gold supply chain due diligence management system, producing a formal evaluation report submitted to the Chief Compliance Officer. This report serves as a critical decision-making tool to guide the standardized operation of the supply chain due diligence framework, ensuring ongoing alignment with LBMA standards and OECD

due diligence guidelines. It also drives continuous improvement of the management system and elevates compliance standards.

### 1.3 建立强有力的内部可追溯体系

#### 1.3 Set up strong internal traceability system

公司构建了完整的供应链追溯机制，实现对所有批次产品的源头透明可查、数据完整和信息可溯，来满足 LBMA 关于供应链尽职调查的规定要求。公司系统化收集、存储并维护所有产品的供应链信息并为每批出库产品分配唯一编码，确保供应链数据的全面性、可验证性及合规性，为企业持续完善负责任采购实践、强化风险管控能力以及提升国际合规水平提供坚实支撑。

#### 1.3.1 供应链可追溯体系

##### 1.3.1 Supply chain traceability system

公司对所有交易合作伙伴均执行严格的供应链尽职调查程序，在合作前进行资信审查，包括采用标准化的尽职调查问卷全面评估供应商的经营资质、业务模式及运营范围、股权架构及原材料采购渠道。在通过合规审核后，双方正式签署合作合同，确保原材料采购完全符合法律法规要求及 LBMA 供应链尽职调查程序。

供应商每一批移交我公司的原料均有交易台账记录，包括供应商名称、原产地、材料类型、移交日期、移交重量、成色等并经物料接洽人员签字确认。黄金原料需经过熔炼后取样检测和分析，最终精炼为标准金锭或受托加工客户需求的金锭。每一批加工完成的成品金料根据来源不同，截止 2024 年，经过受托加工完成的黄金均通知客户自提或交付运输；回购收回的黄金均被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。

The company implements rigorous supply chain due diligence procedures for all trading partners, conducting comprehensive credit assessments prior to collaboration. This includes utilizing standardized due diligence questionnaires to evaluate suppliers' operational qualifications, business models, scope of operations, ownership structures, and raw material procurement channels. Upon passing compliance review, both parties formally sign a cooperation contract to ensure all material procurement fully complies with legal requirements and LBMA's supply chain due diligence protocols.

For each batch of materials transferred to our company, detailed transaction records are maintained, including supplier name, origin, material type, transfer date, weight, and purity, with confirmation signatures from material handling personnel. Gold raw materials undergo smelting, sampling, testing, and analysis before being refined into standard ingots or entrusted-processed ingots as per client requirements. As of 2024, all processed gold products are either collected by clients or delivered via logistics, while repurchased gold is refined into standard ingots sold through the Shanghai Gold Exchange, each ingots is assigned a unique identification number.

公司明确要求运营部、检测部、物流部和财务部等职能部门负责日常供应链数据的采集与保管工作，确保所有供应链相关数据具备完整的可追溯性和可审计性，同时严格执行文件保存期限，要求文件存档期限不少于 5 个财年。

The company mandates that operational, testing, logistics, and finance departments systematically collect and maintain daily supply chain data, ensuring full traceability and auditability. All supply chain-related documents must be retained for a minimum of 5 fiscal years to meet compliance and accountability standards.

### 1.3.1.1 来料

#### 1.3.1.1 Incoming materials

我司所有含金原料运输工作均由母公司德诚珠宝集团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。物流部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，若有异常会立即报告合规官并对来料进行拒收、拒发或隔离。到厂的含金原料由接收人员再复核是回收金，每批次原料给一个唯一的编号，在熔铸过程中取样，并记录到达、精炼加工及出库结束的日期。

All transportation of gold-bearing materials for our company is handled by the specialized gold security transportation team under our parent company, Decent Jewelry Group. This team is responsible for collecting raw materials from various manufacturing centers, sale outlets, and buyback locations under the Group and delivering them to the refinery. The Compliance Specialist from the Logistics Department coordinates with the Group's transportation team to further mitigate risks by verifying the origin and destination of incoming materials and tracking shipment numbers. If any irregularities are detected, they are immediately reported to the Compliance Officer, and the materials may be rejected, withheld, or quarantined.

Upon arrival at the refinery, the receiving personnel conduct a secondary verification to confirm the material as recycled gold. Each batch of raw materials is assigned a unique identification number. Samples are taken during the smelting process, and detailed records are maintained, including dates of arrival, refining processing, and final outbound shipment. This meticulous process ensures full traceability and compliance throughout the supply chain.

### 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根据客户需求，公司可以配送，也支持客户上门取货。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。非福州客户可通过集团运输团队押运，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；公司会对客户的出库指令进行复核，确认流向合理且手续齐全。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 company's recycled gold is exclusively directed to the Shanghai Gold Exchange after refining. For entrusted processing clients, most are internal subsidiaries under the same parent company. Processed gold materials are either delivered by the company based on client requirements or made available for client pickup. Clients in Fuzhou can offer for door-to-door delivery by the Group's transportation team or self-collection at the refinery. Non-Fuzhou clients may choose escorted transport by the Group's team or third-party logistics with insured shipping, with transportation costs borne by the clients.

Prior to shipment, the company rigorously reviews outbound instructions to ensure compliant destinations and complete documentation. The finance department's compliance officer must approve shipping documents and verify payment credentials, maintaining strict oversight throughout the process.

#### 1.3.1.3 通过官方银行渠道付款

#### 1.3.1.3 Payment through official banking channels

公司明令禁止任何现金形式的交易，所有款项必须通过官方银行渠道支付和接收，在货款支付环节实施多重审批机制。运营部作为款项发起部门，需按规定流程提交支付申请，经内部多部门联合审批后，最终通过公司账户所属银行的电子支付平台完成交易。为保障财务透明度并满足监管合规要求，公司要求财务部系统性地保存包括发票和银行交易凭证在内的完整支付记录，这些资料将作为重要财务档案留存，既满足合规审计需要，也为监管部门核查提供依据，从而确保公司资金流向全程可追溯且符合各项法规要求。

The company strictly prohibits all cash transactions, mandating that all payments must be processed exclusively through official banking channels. A multi-tier approval mechanism is implemented for every payment transaction. The Operations Department, as the initiating party, must submit payment requests following established procedures, which then undergo cross-departmental review before final execution via the company's designated bank electronic payment platform.

To ensure financial transparency and regulatory compliance, the Finance Department is required to systematically maintain complete payment records, including invoices and bank transaction documents. These records serve as critical financial archives, fulfilling both compliance audit requirements and regulatory inspection needs. This comprehensive documentation practice guarantees full traceability of fund flows and verifiable adherence to all applicable financial regulations.

#### 1.4 加强与黄金供应商的联系，强化供应商尽职调查能力

#### 1.4 Strengthen the company's connection with gold supply counterparties

公司鼓励与供应商建立基于信任和互认的长期合作关系，特别是遵守经合组织《关于来自受冲突影响和高风险地区负责任供应链尽职调查指南》并扩展至供

供应链中不利 ESG 因素的供应商。

The Company encourages long-term relationships based on trust and mutual recognition with the trading parties, especially the trading parties that comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and extend to the adverse ESG factors in the supply chain.

公司通过培训和线上通讯工具等方式向供应商传达黄金供应链政策及相关要求，要求供应商严格遵守公司政策，并将《LBMA 负责任黄金指南》（第九版）提出的供应链政策和其他要求纳入与供应商签订的合作合同中，鼓励供应商严格遵守并积极配合当地政府机构的法律法规，同时针对已识别的风险，公司提供合规指导，和供应商一起制定能够加以衡量的风险改进计划并监督和审核。

The company communicates its gold supply chain policies and requirements to suppliers through training sessions and online communication tools, emphasizing strict adherence to company policies. Key documents such as the LBMA Responsible Gold Guidance (9th Edition) and other supply chain requirements are incorporated into supplier contracts. Suppliers are encouraged to comply fully with these policies and cooperate with local government regulations. For identified risks, the company provides compliance guidance, working collaboratively with suppliers to develop measurable risk improvement plans that are subject to ongoing monitoring and review.

供应商培训：2024 年 4 月 18 日，公司专门组织 10 家供应商开展了黄金供应链合规管理培训，培训内容包括《负责任黄金指南》（第 9 版）、《黄金供应链尽职调查管理政策》、《反洗钱及反恐怖主义融资规章制度》以及《关于劳动者保护相关社会责任行为的要求和声明》。培训过程中，合规官通过互动问答的方式确保参会人员准确理解培训内容，评对培训效果做出评价，输出培训记录表。所有培训及评价记录均已妥善存档。

**Supplier Training:** On April 18, 2024, the company conducted specialized training on gold supply chain compliance management for 10 suppliers. The training covered the Responsible Gold Guidance (9th Edition), Gold Supply Chain Due Diligence Management Policy, Anti-Money Laundering and Counter-Terrorist Financing Regulations, and Requirements and Declaration on Social Responsibility for Labor Protection. The Compliance Officer ensured participants' comprehension through interactive Q&A sessions, assessed training effectiveness, and documented outcomes in training records. All training and evaluation materials have been properly archived.

同时，在 2024 年的供应商培训中，公司将要求所有供应商签署《承诺书》，承诺已签收《黄金供应链尽职调查管理政策》、《反洗钱反恐怖主义融资规章制度》和《关于劳动者保护相关社会责任行为的要求和声明》，并严格遵守 LBMA 的要求，积极配合完成各项尽职调查工作。针对公司的大客户，公司进一步要求其备案下游客户发票，以加强税务合规监管，有效防范潜在的税务风险，从而保障整体交易流程的透明性和合规性。

Additionally, during 2024 supplier training sessions, the company required all suppliers to sign a Letter of Commitment, affirming receipt and adherence to the Gold Supply Chain Due Diligence Management Policy, Anti-Money Laundering and Counter-Terrorist Financing Regulations, and Requirements and Declaration on Social Responsibility for Labor Protection. Suppliers further pledged to comply with LBMA standards and actively participate in due diligence processes. For major clients, the company implemented additional measures, such as requiring the filing of downstream customer invoices, to strengthen tax compliance oversight, mitigate potential tax risks, and ensure end-to-end transaction transparency and regulatory alignment.

## 1.5 建立保密申诉机制

### 1.5 Confidential appeal mechanism

公司建立了《申诉管理程序》，并以中英双语的形式发布于公司官方网站，公开相关联系方式，包括电话及电子邮件，允许员工和外部利益相关者表达对黄金供应链中的采购、采矿、贸易、加工及运输过程中任何疑似风险的担忧。公司建立了完善的申诉处理程序，并确保其独立、透明、公平公正、并尊重所有投诉。同时严格保护投诉者的隐私，所有投诉信息将被匿名化，申诉处理小组全员不得以任何形式对外透露投诉人的身份信息，任何可能泄露投诉人身份的内容将在通知利益相关者并进行调查之前被删除。以杜绝任何行为的打击报复。

网址链接：<http://www.houdejin.com/>

The company has established a Grievance Management Procedure, published in both Chinese and English on its official website which provides contact details including phone numbers and email addresses for employees and external stakeholders to report concerns about potential risks in the gold supply chain, such as procurement, mining, trading, processing, or transportation. The procedure ensures independent, transparent, and impartial handling of all complaints while strictly protecting whistleblowers' privacy. All complaint information is anonymized, and members of the grievance team are prohibited from disclosing the identity of complainants in any form. Any content that could reveal a complainant's identity is removed before notifying relevant stakeholders or initiating investigations, thereby preventing any form of retaliation.

Website link: <http://www.houdejin.com/>

公司设立申诉处理小组，一般处理流程如下：收到投诉后，投诉小组需在 10 个工作日内确认收到，并进行受理或不予受理的审核。不予受理的，应当向投诉人说明不予受理的理由，并记录在案。对于重大投诉，投诉小组应在受理投诉后 30 个工作日内对投诉内容进行调查、审查和裁决。投诉信息将被匿名化，任何可能泄露投诉人身份的内容将在通知利益相关者并进行调查之前被删除。在投诉复杂且需要更多时间进行调查的情况下，申诉处理小组应采取合理措施，包括召集一次或多次会议作出合理决定，要求投诉人或其他人提供额外信息，并咨询专家。调查结束后，对投诉的处理决定应当以书面形式告知投诉人和利益相关方。申诉决定的内容应包括：决定本身、作出决定的日期和任何建议。

A dedicated grievance team oversees the process, which typically involves acknowledging receipt of a complaint within 10 working days and determining whether to accept or reject it. If rejected, the team must provide the complainant with a written explanation and document the decision. For major complaints, the team conducts investigations, reviews, and resolutions within 30 working days of acceptance. Complex cases may require extended timelines, during which the team may hold meetings, request additional information from complainants or other parties, or consult experts. Upon concluding an investigation, the team issues a written decision to the complainant and stakeholders, detailing the outcome, date of resolution, and any recommendations.

截止 2024 年底，公司未收到任何来自内部员工及外部利益相关者的投诉。2 公司将继续按照《申诉管理程序》的规定持续确保申诉机制的有效执行；

As end of 2024, the company has not received any complaints from internal employees or external stakeholders. The company remains committed to upholding the effectiveness of this grievance mechanism in accordance with the Grievance Management Procedure, reinforcing its dedication to ethical supply chain practices and stakeholder accountability.

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**

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**Compliance Statement with Requirement:**

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.**

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**2.1 开展供应链尽职调查，识别潜在风险**

**2.1 Conduct due diligence on the supply chain and identify potential risks**

在开展供应链尽职调查过程中，公司依据 LBMA 负责任黄金指南第二步的规定，建立了完善的供应链风险识别与评估机制，并专门制定了《受冲突影响和高风险区域识别程序》。该程序明确受冲突影响和高风险区域的定义，并制定了风险识别的方法、信息资源获取渠道、风险分类及评估流程，并纳入全球制裁名单、反洗钱（AML）和恐怖主义融资（CTF）筛查、地缘政治风险监测及企业尽职调查，旨在确保供应链管理的透明度、合规性，以及尽职调查工作的有效落实。

In conducting supply chain due diligence, the company has developed a robust

risk identification and assessment framework based on Step 2 of the LBMA Responsible Gold Guidance. This includes the establishment of a specialized "Conflict-Affected and High-Risk Areas (CAHRAs) Identification Procedure" that clearly defines conflict zones and high-risk regions while detailing systematic methodologies for risk detection, information resource acquisition channels, risk classification, and assessment process. The procedure incorporates multiple verification layers, such as cross-checking against global sanctions lists, conducting anti-money laundering (AML) and counter-terrorism financing (CTF) screenings, and monitoring geopolitical developments through reliable intelligence sources to ensure transparency, compliance, and effective implementation of due diligence in supply chain management.

在整个供应链风险识别的过程中，公司主要引用了以下权威机构或官方资源：

In the process of identifying risks throughout the supply chain, the company mainly cited the following authoritative institutions or official resources:

1. 制裁名单（美国、英国、欧盟、联合国及相关制裁名单）  
1. Sanctions List (US, UK, EU, UN and related sanctions lists)
2. 多德—弗兰克法案第 1502 条  
2. Section 1502 of the Dodd-Frank Act
3. 欧盟 CAHRA 名单  
3. EU CAHRA list
4. 《海德堡冲突晴雨表》  
4. Heidelberg Conflict Barometer
5. 脆弱国家指数或类似的指数  
5. Fragile States Index or similar index
6. 联合国人权事务高级专员办事处或同等机构  
6. The Office of the United Nations High Commissioner for Human Rights or an equivalent institution
7. 金融行动特别工作组(简称 FATF) 报告  
7. The Financial Action Task Force (FATF) Report
8. 高风险黄金中心/转运中心和高洗钱风险国家/地区的可靠市场情报  
8. Reliable market intelligence on high-risk gold hubs/transshipment centers and high money laundering risk countries/regions.

公司要合规委员会对以上资源保持至少一年更新一次，确保所有参考数据源保持最新状态。一旦相关权威机构发布新信息，公司将立即对受冲突影响和高风险区域（CAHRAs）进行重新评估，以持续保证供应链尽职调查工作的合规性和有效性。

The company mandates that its Compliance Committee update all reference resources at least annually to ensure data currency. Whenever authoritative institutions release new information, the company promptly reassesses conflict-affected and high-risk areas (CAHRAs) to maintain ongoing compliance and effectiveness in

supply chain due diligence.

2024年，公司通过建立合格供应商档案，绘制供应链地图。充分考虑与经合组织附件二相关的不利影响，并扩展至 ESG 不利因素，从**位置、供应商和原材料**三个维度充分识别供应链风险，快速应对潜在风险，并实时优化供应链管理策略。

In 2024, the company established qualified supplier profiles and mapped its supply chain network. This process thoroughly addresses adverse impacts referenced in OECD Annex II, while expanding to ESG risk factors. By evaluating risks across three dimensions: *geographic locations, suppliers, and raw materials*, the company enhances its ability to identify vulnerabilities, respond swiftly to potential threats, and dynamically optimize supply chain management strategies.

2024年度，公司的黄金采购活动主要集中在中国大陆的福建省、广东省及浙江省，供应商主要为同一母公司集团下属的各子公司及长期合作品牌，采购的黄金物料类型均为销售环节和生产加工环节产生的黄金旧饰、损饰及生产过程中的边角料的再生金。

Throughout 2024, the company's gold procurement activities were primarily concentrated in China's Fujian, Guangdong, and Zhejiang provinces. Suppliers consisted exclusively of subsidiaries under the same parent company group and long-term brand partners. All sourced gold materials comprised recycled gold from sales channels and manufacturing processes, including used jewelry, damaged ornaments, and production scrap. This closed-loop sourcing model reinforces traceability while aligning with circular economy principles.

**基于位置风险识别:**公司严格遵守《受冲突影响和高风险区域识别程序》，参照国际公认的风险评估标准对供应商的位置进行了系统审查。通过综合评估制裁名单（美国、英国、欧盟、联合国及相关制裁名单）、欧盟 CAHRA 名单、金融行动特别工作组（FATF）报告、高风险黄金中心/转运中心和高风险国家/地区的可靠市场情报等权威数据，确认 2024 年中国未被列入受冲突影响和高风险区域（CAHRAs）名单。同时公司未识别出供应链涉及 CAHRAs，确认黄金采购活动符合 LBMA 负责任黄金指南及 OECD 尽职调查框架的合规要求。

**Location-Based Risk Identification:** The company strictly adheres to the "Conflict-Affected and High-Risk Areas (CAHRAs) Identification Procedure" and conducts systematic reviews of supplier locations based on internationally recognized risk assessment standards. By integrating authoritative data sources including sanctions lists (e.g., from the U.S., U.K., EU, and UN), the EU CAHRA list, Financial Action Task Force (FATF) reports, market intelligence on high-risk gold hubs/transshipment centers, and jurisdictions with elevated money laundering risks, the company confirmed that China was not classified as a CAHRAs in 2024. Furthermore, no supply chain linkages to CAHRAs were identified, ensuring that gold procurement activities fully comply with the LBMA Responsible Gold Guidance and the OECD Due Diligence Framework.

**基于供应商风险识别:** 公司严格遵守《受冲突影响和高风险区域的识别程序》, 参照《反洗钱反恐怖主义融资规章制度》、《关于劳动者保护相关社会责任行为的要求和声明》等国际公认的风险评估标准对供应商信息进行了系统审查。利用合规委员会拥有的资源、经验和专业技能, 结合《受冲突影响和高风险区域的识别程序》中引用的当地政府公示信息, 对供应商的背景、是否为政治公众人物、是否受到当地政府及国际制裁、是否直接或间接支持非政府非国家武装团体组织, 是否涉及侵犯人权等风险进行识别, 截止 2024 年底, 公司未发现任何供应商存在以上疑似风险;

**Supplier-Based Risk Identification:** The company rigorously adheres to the "Conflict-Affected and High-Risk Areas Identification Procedure" and systematically evaluates supplier information against internationally recognized risk assessment standards, including the Anti-Money Laundering and Counter-Terrorist Financing Regulations and the Requirements and Declaration on Social Responsibility for Labor Protection. Leveraging the Compliance Committee's expertise, resources, and local government disclosures referenced in the identification procedure, the company assesses suppliers for potential risks such as political exposure, government or international sanctions, direct or indirect support for non-state armed groups, and human rights violations.

As of the end of 2024, no suppliers were found to exhibit any of these red flags, confirming full alignment with the LBMA Responsible Gold Guidance and OECD Due Diligence Framework.

**基于原材料风险识别:** 公司严格遵守《受冲突影响和高风险区域的识别程序》, 对供应商不同类型的物料风险进行识别, 针对开采金和采矿副产品, 公司通过要求供应商提供合法开采许可证, 黄金进出口许可证、生产中的汞使用及储存报告、环境评审报告、安全作业指导手册、工作环境安全设施的配备情况如适当的重物搬运工具和高温防护措施等) 的方式对风险进行识别; 针对再生金, 公司要求供应商提供主要市场、产品及客户信息对其采购的黄金来源和使用目的进行判断, 根据供应商的经营性质, 设备类型、经营地点和其计划采购物料及精炼的物料类型进行匹配来识别风险; 截止 2024 年底, 公司未发现任何以上疑似风险;

**Raw Material-Based Risk Identification:** The company strictly complies with the "Conflict-Affected and High-Risk Areas Identification Procedure" to assess risks associated with different types of supplier materials. For mined gold and mining by-products, suppliers are required to submit legal documentation, including valid mining licenses, gold import/export permits, mercury usage and storage reports, environmental review reports, safety operation manuals, and evidence of workplace safety measures (e.g., proper heavy-load handling equipment and high-temperature protection). For recycled gold, The company requires suppliers to provide key market, product, and customer information to determine the source and purpose of their gold purchases. Based on the supplier's business nature, equipment type, operating location, and the type of materials they plan to purchase and refine, perform one-on-one matching and verification.

As of the end of 2024, the company has not identified any of the above suspected

risks.

## 2.2 风险评估和分类

### 2.2 Risk assessment and classification

2024 年公司对已制定《风险评估程序》进行了更新和完善，将供应链分为：零容忍供应链、高风险供应链和低风险供应链三个类别。

In 2024, the company updated and improved the established “Risk Assessment Procedure”, dividing the supply chain into three categories: zero tolerance supply chain, high-risk supply chain, and low-risk supply chain.

#### 2.2.1 零容忍供应链

##### 2.2.1 zero-tolerance supply chain

公司识别供应商是否存在零容忍问题，包括以下：

The company rigorously screens suppliers for zero-tolerance supply chain, which include but are not limited to the following critical issues:

- 1) 开采金来自被指定的世界遗产或保护区的地区；  
1) Gold sourcing from designated World Heritage Sites or protected conservation zones;
- 2) 已知开采金或再生金的来源违反了国际制裁（包括但不限于联合国、欧盟、英国和美国制裁）；  
2) Any known mined or recycled gold against the international sanctions including but not limited to sanctions imposed by the United Nations, the European Union, the United Kingdom, and the United States);
- 3) 开采金或再生金的供应对手方、其他已知的上游公司或其最终受益人（UBO）是已知的洗钱者、欺诈者或恐怖分子。  
3) Suppliers, upstream partners, or ultimate beneficial owners (UBOs) associated with money laundering, fraud, or terrorism financing are excluded from the supply chain through rigorous background checks.
- 4) 严重侵犯人权，包括强迫劳动、使用童工、抵债、奴役、或以惩罚或恐吓手段的、非自愿的劳动等；  
4) Serious violations of human rights, including forced labor, use of child labor, debt repayment, slavery, or involuntary labor through punishment or intimidation;
- 5) 直接或间接支持非法非国家武装组织，或通过供应链为冲突地区提供资金支持。  
5) Direct or indirect backing of illegal non-state armed groups, or financial contributions to conflict zones through the supply chain, is grounds for immediate disqualification.

#### 2.2.2 高风险供应链

##### 2.2.2 high-risk

1) 基于位置的高风险：公司重点审核开采金/再生金的地理来源，如下：

1) *Location based high-risk: The company focuses on reviewing the geographical*

*sources of mined/recycled gold, as follows:*

- a) 来自受冲突影响和高风险地区 (CAHRA) 或曾在该等地区过境或通过该等地区运输;  
a) **Originating from conflict affected and high-risk areas (CAHRA) or having transited or transported through such areas;**
- b) 据称来自已知或合理怀疑来自 CAHRA 的黄金过境的地区;  
b) **It is reported that gold from countries/regions known or reasonably suspected to be in transit from CAHRA;**
- c) 据称来自已知储量、可能资源或预期产量有限的国家/地区。(即宣称的来自该国的黄金产量与其已知储量或预期生产水平不符)。  
c) **Alleged Sourcing from Countries/Regions with Limited Known Reserves or Production Capacity;**

2) *基于供应商的高风险: 公司重点审核供应商及其上游供应商的以下情形:*

2) *Suppliers based high risk based: The company focuses on auditing suppliers and their upstream suppliers in the following situations:*

- a) 具有符合基于位置高风险标准的股东或 UBO 或其他供应权益;  
a) **Having shareholders, UBOs, or other supply equity that meets location-based high-risk criteria;**
- b) 具有身为政治人物 (PEP) 的 UBO;  
b) **Having a UBO as a Politician (PEP);**
- c) 从事高风险商业活动 (如军火、赌博和娱乐业、古董和艺术、教派及其领袖);  
c) **Engaging in high-risk commercial activities such as arms, gambling and entertainment, antiques and art, religious sects and their leaders;**
- d) 已知在去过 12 个月曾从高风险国家/地区采购黄金;  
d) **Known to have purchased gold from high-risk countries/regions within the past 12 months;**
- e) 提供的文件有重大异常/不一致, 或拒绝提供所要求的文件。  
e) **The provided documents have significant abnormalities/inconsistencies, or the requested documents are refused.**

3) *基于物料类型的高风险: 公司重点审核以下情形:*

3) *Material based high risk: The company focuses on reviewing the following situations:*

- a. 采购自 ASM、使用汞生产、造成灾难性伤害或产生高度不利 ESG 因素的开采金;  
a. **Mining gold sourced from ASM, produced using mercury, causing catastrophic harm, or generating highly unfavorable ESG factors;**
- b. 来自具有高风险供应链的中间精炼厂或交易商的再生金或从具有高风险供应链的中间精炼厂采购的再生金;  
b. **Recycled gold from intermediate refineries or traders with high-risk supply chains, or recycled gold purchased from intermediate refineries with high-risk supply chains;**

除以上风险外, 公司将开采金或再生金的供应商、其他已知的上游公司违反 ESG 因素的, 包括违反环境保护和危废处理要求、违反劳工权益和社区治理要求, 及不遵循商

业诚信和道德规范，违反采掘业透明制度倡议（EITI 原则）的行为均纳入高风险范围。

In addition to the aforementioned risks, the company categorizes suppliers of mined or recycled gold as well as any known upstream entities as high-risk if they violate ESG (Environmental, Social, and Governance) principles. This includes but is not limited to: Failure to meet ecological protection standards or hazardous waste disposal requirements. Practices that infringe on worker rights or disregard community governance norms. And actions contrary to business integrity and ethical standards, including non-adherence to the Extractive Industries Transparency Initiative (EITI) principles.

## 2.2 评估 CAHRAs 的资源 and 标准

### 2.2 Evaluate the resources and standards of CAHRAs

公司引用以下表格中的资源，涵盖人权、冲突和治理风险的资源类型，定义并确定 CAHRAs 的标准阈值，任何国家和地区在下表中任意资源上的指数超过了公司的判定标准，则会被判定为受冲突影响和高风险区域（CAHRAs）。

The company utilizes the resources listed in the table below, which cover human rights, conflict, and governance risk indicators, to define and establish threshold criteria for identifying Conflict-Affected and High-Risk Areas (CAHRAs). Any country or region that exceeds the company's defined risk thresholds in any of the referenced resources will be classified as a CAHRA.

风险领域 Risk Sector	引用资源 Reference Resources	CAHRAs 判定标准阈值 CAHRAs judgment criteria
人权 Human Rights	联合国人类发展指数 (UN Human Development Indicator) <a href="https://hdr.undp.org/data-center/country-insights#/ranks">https://hdr.undp.org/data-center/country-insights#/ranks</a>	《人类发展指数》HDI value 小于 0.6 的区域。 Regions with HDI value less than 0.6.
冲突 Conflict	《海德堡冲突晴雨表》（海德堡国际冲突研究所） Conflict Barometer Index (Heidelberg Institute of International Conflict Research): <a href="https://hiik.de/?lang=en/">https://hiik.de/?lang=en/</a>	冲突强度达到 4 或以上的区域 Areas with conflict intensity of 4 or above
治理 Govern	《脆弱国家指数》（Fragile States Index): <a href="https://fragilestatesindex.org/global-data/">https://fragilestatesindex.org/global-data/</a>	《脆弱国家指数》排名 Rank 在 1-45 名的区域 Regions ranked between 1-45 in Rank

风险领域 Risk Sector	引用资源 Reference Resources	CAHRAs 判定标准阈值 CAHRAs judgment criteria
监管法规 laws and regulations	《多德-弗兰克法案》 Dodd-Frank Act	《多德-弗兰克法案》第 1502 节 (DFA 1502) 中定义的“指明国家”，包括：刚果民主共和国及其 9 个毗邻国家，即安哥拉、布隆迪、中非共和国、刚果共和国、卢旺达、南苏丹、坦桑尼亚、乌干达和赞比亚被识别为 CAHRAs
	《欧盟法规》：CAHRAs under Regulation (EU) 2017/821 (EU CAHRAs List) : <a href="https://www.cahrastlist.net/cahras">https://www.cahrastlist.net/cahras</a>	欧盟委员会根据《欧盟法规》2017/821 第 14.2 条识别的受冲突影响和高风险区域 (EU CAHRAs List), 任何被列入该清单的区域都被识别为 CAHRAs.

### 2.3 风险评估

#### 2.3 Risk Assessment

公司通过向供应商发放 KYC 调查问卷及配套管控措施，全面完善供应链合规水平和风险管控能力。

The company has comprehensively improved its supply chain compliance and risk management capabilities by distributing KYC survey questionnaires and supporting control measures to suppliers.

##### 2.3.1 资质验证

##### 2.3.1 Qualification Verification

公司对所有供应商进行严格的尽职调查，确保其资质、运营及供应链管理符合 LBMA 负责任黄金指南的要求。

The company conducts strict due diligence on all suppliers to ensure that their qualifications, operations, and supply chain management comply with the requirements of the LBMA Responsible Gold Guidance.

- a. 要求法人客户提供营业执照、最终受益人信息及税务合规证明；  
a. Require corporate clients to provide their business license, ultimate beneficiary information, and tax compliance certificate;
- b. 要求个人客户提供有效的身份证明及采购凭证并验证；  
b. Require individual customers to provide valid identification and purchase vouchers and verify them;
- c. 要求采矿供应商提供采矿许可证、环境影响评估 (EIA) 认证、矿工安全及健康合格证明；  
c. Require mining suppliers to provide mining licenses, environmental impact

assessment (EIA) certification, and miner safety and health qualification certificates;

### 2.3.2 档案建立

#### 2.3.2 Archive Establishment

- a. 收集供应商基本信息、股东信息、企业基础信用报告、确保其运营合法合规；  
a. Collect basic information of suppliers, shareholder information, basic credit reports of enterprises, and ensure their operation is legal and compliant;
- b. 评估供应商运营范围和目的，确认供应商原料来源可追溯；  
b. Evaluate the scope and purpose of supplier operations, confirm the traceability of supplier raw material sources;

### 2.3.3 评估风险

#### 2.3.3 Evaluate Risk

- 关于位置、运输路线和供应商所在地，以下任意一项达到高风险标准，则判定为高风险采购。
- Regarding the location, transportation route, and supplier's location, if any of the following criteria meet the high-risk criteria, it is considered a high-risk procurement.

NO.	资源/Resources	指标/Index	高风险标准（临界值） High risk standard
1	原产地 Place or Origin	非 CAHRAs 国家 None CAHRAs Countries	CAHRAs
2	运输路线 Transport route	非 CAHRAs 国家 None CAHRAs Countries	CAHRAs
3	供应商所在地 Supplier's location	非 CAHRAs 国家 None CAHRAs Countries	CAHRAs

- 关于供应商合法性，以下任意一项达到高风险标准，则判定为高风险采购。
- Regarding the legality of suppliers, if any of the following criteria meets high-risk standards, it will be deemed as high-risk procurement.

NO.	资源/Resources	指标/Index	高风险标准（临界值） High risk standard
1	供应商的身份 Supplier's identity	经过验证 Validated	没有提供信息或无法验证 Unable to provide information or verify
2	供应商的合法性 Legitimacy of suppliers	经过验证 Validated	没有提供信息或无法验证 Unable to provide information or verify
3	供应商的业务类型 Supplier's business type	经过验证 Validated	没有提供信息或无法验证 Unable to provide

			information or verify
4	股东或最终受益人信息 Shareholder or ultimate beneficiary information	没有涉及相关制裁名单 失信名单 No relevant to any sanctions list or Dishonest Individuals	有涉及相关制裁名单 失信名单 Related to any sanctions list or Dishonest Individuals

### 2.3.4 监控交易

#### 2.3.4 Monitor transactions

公司要求记录每批次来料的信息，包括供应商名称、原产地、材料类型、移交日期、移交重量、成色并核实主要上游交易方的合规性；持续动态监控交易过程的风险，发现异常上报合规官重新进行风险评估。

The company requires recording information for each batch of incoming materials, including supplier name, origin, material type, transfer date, transfer weight, and purity, while verifying the compliance of key upstream trading parties. It continuously monitors risks in the transaction process and reports any abnormalities to the compliance officer for reassessment.

根据公司要求，一旦发现供应链中识别出任何属于高风险采购的警示信号，公司将实施加强型尽职调查（EDD）。

According to company requirements, once any warning signals belonging to high-risk procurement are identified in the supply chain, the company will implement Enhanced Due Diligence (EDD).

### 2.4 加强型尽职调查

#### 2.4 Enhanced Due Diligence

公司建立《加强型尽职调查程序》，若触发 EDD，公司必须在任何交易发生前或业务关系开展后的 6 个月对供应商进行实地调查/考察；根据所要调查供应商公司的具体情况和业务特点，制定详细的尽职调查计划，包括警示信号类别、调查对象、调查范围、时间表、权责分配、所需资源及数据等，作成【加强型尽职调查计划】。具体执行流程如下：

The company establishes the Enhanced Due Diligence (EDD) Procedures, stipulating that if EDD is triggered, the company must conduct on-site investigations/visits to suppliers within 6 months before any transaction occurs or after initiating a business relationship. Based on the specific circumstances and operational characteristics of the supplier under investigation, a detailed due diligence plan must be formulated. This plan includes: warning signal categories, survey subjects, survey scope, timeline, allocation of responsibilities, required resources and data, etc. The specific execution process is as follows:

- 首先，合规官发起内部会议对发现的高风险警示信号进行核实和分类；
- Firstly, the compliance officer initiates an internal meeting to verify and classify the identified high-risk warning signals;

- 再次，组建团队，筛选与供应商没有任何利益冲突的并具有丰富经验和专业技能的员工组成专业团队。团队成员包括财务专家、人力资源专家、风险管理专家、现场访问人员等。
- Once again, form a team and select employees with rich experience and professional skills who have no conflicts of interest with suppliers to form a professional team. The team members include financial experts, human resources experts, risk management experts, on-site visitors, etc.
- 最后，制定【加强型尽职调查计划】和计划预算，提交委员会审批；
- Finally, develop an enhanced due diligence plan and budget, and submit them to the committee for approval;

#### 2.4.1 实地考察

##### 2.4.1 On spot investigation

考察团队需按计划时间去到供应商的实际业务场所/办公场所，对供应商供应链中涉及高风险的每一家公司开展 KYC 活动，考察人员必须承诺如实、准确地报告。

The inspection team is required to visit the actual business premises/office of the supplier at the planned time to carry out KYC activities for each company involved in high risks in the supplier's supply chain. The inspectors must commit to reporting truthfully and accurately.

财务专家负责收集财务资料包含：合同、采购单据、库存记录、销售金额和成本信息，通过银行流水、税务申报等确认风险，具体措施有：检查是否存在大额现金交易、未申报的跨境转账、或与高风险地区（如开曼群岛、维京群岛）的资金往来、对比同行业企业毛利率、净利率，若某企业利润率显著高于行业平均水平（如赌博、军火行业常见），进一步核查其收入来源合法性。

Financial experts are responsible for collecting financial documents such as: Contracts, purchase documents, inventory records, sales data and cost data, and confirming risks through bank statements, tax declarations, etc. Specific measures include: Check for large cash transactions, unreported cross-border transfers, or financial exchanges with high-risk regions such as the (Cayman Islands and the Virgin Islands). Compare the gross profit margin and net profit margin of enterprises in the same industry. If the profit margin of a certain enterprise is significantly higher than the industry average (common in gambling and the military industry), further verify the legality of its income sources.

人力资源专家负责进行员工访谈和收集员工劳动合同信息；具体措施有：查阅供应商的劳动合同（是否包含童工年龄限制及“扣押身份证”等霸王条款）、查看工作环境（是否存在限制人身自由的设施，如封闭式宿舍）、通过员工考勤记录和工资单确认是否有扣押薪资行为、了解女性员工比例及投诉记录等；

Human resource experts are responsible for conducting employee interviews and collecting information on employees' labor contracts. Specific measures include: reviewing the labor contracts of suppliers (whether they contain age restrictions for child labor and unfair terms such as "seizing ID cards"), inspecting the working

environment (whether there are facilities that restrict personal freedom, such as closed dormitories), confirming through employee attendance records and pay slips whether there is any salary seizure, and understanding the proportion of female employees and complaint records, etc.

合规专家负责收集供应商负责任黄金采购相关政策文件、核实中间精炼商 UBO 的身份信息和负责任采购实践的独立鉴证报告（如有中间精炼商）。

具体措施有：访问供应商管理人员关于《黄金供应链尽职调查管理制度》《反洗钱和反恐怖主义融资管理制度》《关于劳动者保护相关社会责任行为的要求和声明》的制定及执行情况，通过政府信息公开网核实 UBO 身份，针对开采金供应商的高风险，还需确认开采生产过程中是否存在汞的使用、储存及处理报告；

Risk management experts are responsible for collecting policy documents related to responsible gold procurement from suppliers, verifying the identity information of intermediate refiners (UBO), and independent verification reports on responsible procurement practices (if there are intermediate refiners).

Specific measures include: Visit the supplier management personnel regarding the formulation and implementation of the "Gold Supply Chain Due Diligence Management policy", "Anti-Money Laundering and Anti-Terrorist Financing Management policy", and "Requirements and Statements on Social Responsibility Behaviors Related to Workers Protection", verify the UBO identity through the government data information Disclosure Network, It is also necessary to confirm whether there are reports on the use, storage and disposal of mercury during the mining and production process for high risk gold mining suppliers .

如因疫情、战争或其他客观原因无法实地考察的，可以采取以下补充措施：通过视频或电话会议与供应商进行在线访谈；要求对方提供与实际运营相关的生产、办公、物流等场所的简短视频；扩大对对方日常运营、交易记录和尽职调查记录的抽查和审计范围；调查对方所在地区的社区、政府和第三方机构，及其上下游合作客户。

If unable to arrive at the scene due to epidemic, war or other objective reasons, the following supplementary measures can be taken: conduct online interviews with suppliers through video or teleconference; request the other party to provide brief videos of their production, office, logistics, and other venues related to actual operations; expand the scope of spot checks and audits on the other party's daily operations, transaction records, and due diligence records; and investigate the communities, governments, and third-party institutions in the area where the other party is located, as well as their upstream and downstream cooperation customers.

2024 年，我司的供应商和潜在合作客户均位于中国，所有供应商均为黄金首饰生产商和批发商，并无黄金矿商。我们收到的黄金原料主要是客户委托进行提纯和回购的。所有委托提纯后的黄金会返回到供应商，所有回购业务提纯后的黄金会铸锭入库到上海黄金交易所，整个业务流程均合法合规，并且我们对供应商均做了全面的尽职调查，所有受托提纯和回购的黄金均为再生金，所有使用的黄金原料均来源于中国，在供应链可追溯性和调查过程中未发现任何警示信号，并不存在高风险因素。因此，我们尚未启动对高风险合作伙伴的现场访问，也未邀

请外部评估人员进行此类访问。

In 2024, Our partners and potential clients are all located in China (low-risk areas), and all suppliers are gold jewelry manufacturers and wholesalers, with no gold miners. The gold raw materials we receive are mainly commissioned by customers for purification and repurchase. All commissioned purified gold will be returned to suppliers, and all repurchased gold will be cast into ingots and stored in the Shanghai Gold Exchange. The entire business process is legal and compliant, and we have conducted comprehensive due diligence on all suppliers. All entrusted purified and repurchased gold is recycled gold, and all used gold raw materials come from China. No red flag risks have been found in the supply chain traceability and investigation process, and there are no high-risk factors. Therefore, we have not yet initiated on-site visits to high-risk partners, nor have we invited external evaluators for such visits.

#### 2.4 风险评估报告与高级管理层汇报 2.4 Risk assessment report

公司已建立规范化的供应链风险评估报告机制，确保风险管理流程符合透明度、可追溯性及合规性要求。根据 LBMA 《负责任黄金指南》的规定，所有的风险识别和评估均编制风险评估报告并由合规总监审核和签批，并定期向高级管理层汇报；具体报告流程如下：

The company has established a standardized supply chain risk assessment reporting mechanism to ensure that risk management processes meet requirements for transparency, traceability, and compliance. In accordance with the LBMA Responsible Gold Guidance, all risk identification and assessment activities are documented in risk assessment reports, which are reviewed, approved, and signed by the Compliance Director, and regularly reported to senior management.

The specific reporting process is as follows:

- (1) 合规委员会定期对供应链尽职调查结果进行分析，并编制风险评估报告。  
(1) The Compliance Committee regularly analyzes the results of supply chain due diligence and prepares risk assessment reports.
- (2) 该报告由合规总监审批，并根据评估结果制定针对性的风险缓解计划；  
(2) These reports are reviewed and approved by the Chief Compliance Officer, who then formulates targeted risk mitigation plans based on the assessment findings.
- (3) 必要时，风险评估结果及风险缓解措施将提交高级管理层及董事会；  
(3) Where necessary, the risk assessment results and corresponding mitigation measures will be escalated to senior management and the board of directors.

公司已顺利完成 2024 年度供应链风险评估工作，并将评估结果提交合规总监。评估结果显示，本年度供应链体系未发现任何零容忍风险和高风险供应商，所有交易均符合 LBMA 尽职调查框架和 OECD 指南要求。尽管当前供应链风险评估

结果良好，公司仍将持续强化风险管理体系，保持常态化风险监测机制，严格执行供应链透明度管理标准，确保全流程可追溯性，并持续符合国际合规要求。

The company has successfully completed its 2024 supply chain risk assessment and submitted the results to the Chief Compliance Officer. The assessment indicates that no zero-tolerance risks or high-risk suppliers were identified within this year's supply chain system, and all transactions comply with the LBMA Due Diligence Framework and OECD Guidance requirements.

Despite the favorable current assessment results, the company will continue to strengthen its risk management system, maintain routine risk monitoring mechanisms, strictly enforce supply chain transparency standards, ensure end-to-end traceability, and consistently meet international compliance requirements.

### 第三步 设计并实施策略应对已识别的风险

#### Step 3: Design and Implement a Management Strategy to Respond the Identified Risks

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合规声明与要求:

Compliance Statement with Requirement:

我方已完全遵照第 3 步：设计并实施策略应对已识别的风险

We have fully complied with Step 2: Design and Implement a Management Strategy to Respond the Identified Risks

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公司制定了专门的《风险缓解程序》，以确保在未来识别出风险时能够快速响应并采取有效的缓解措施。

The company has developed a specialized 'Risk Mitigation Procedure' to ensure quick response and effective mitigation measures when risks are identified in the future.

#### 3.1 零容忍风险管理

##### 3.1 Zero-tolerance Risk Management

公司要求，当尽职调查风险评定结果为“零容忍”时，新供应商不得合作，已合作供应商立即停止合作；

The company requires that when the due diligence risk assessment result is 'zero tolerance', new suppliers shall not cooperate, and existing suppliers shall immediately cease cooperation;

#### 3.2 高风险管理

##### 3.2 High Risk Management

公司要求，当尽职调查风险评定结果为“高风险”时，根据风险警示信号类型，对供应商进行暂停关系和维持关系的处理；

The company requires that when the due diligence risk assessment result is "high risk", suppliers should be suspended or maintained based on the type of risk warning signal;

### 3.2.1 暂停关系

#### 3.2.1 suspended

如果发现供应商涉及以下任何行为，公司将暂停合作关系。针对暂停合作关系，如果供应商提供了反驳初步怀疑的额外信息及佐证，或针对 ESG 影响做出了及时和适当的回应，经过合规总监批准后可恢复合作；

The company will suspend cooperation with any supplier found to be involved in the following activities. Suspended partnerships may be reinstated only if the supplier provides additional evidence refuting the initial suspicions or demonstrates timely and appropriate corrective actions regarding ESG impacts, subject to approval by the Chief Compliance Officer:

- a. 参与洗钱或资助恐怖主义融资；  
a. Engaging in money laundering or financing terrorism;
- b. 严重侵犯人权；  
b. Committing severe human rights violations;
- c. 直接或间接支持非法非国家武装组织；  
d. Directly or indirectly supporting illegal non-state armed groups;
- e. 谎报开采金产地或再生金来源；  
d. Misrepresenting the origin of mined gold or the source of recycled gold.

### 3.2.2 维持关系

#### 3.2.2 Maintained

如供应商尽职调查结果未涉及零容忍和暂停关系行为，但结果也未能令人满意，同时供应商已采取合理且善意的合规努力，公司可以在强化监控的情况下，与供应商维持合作关系，同时监督供应商改进计划的执行，直至风险警示信号消除，并记录存档。

If the supplier due diligence results do not involve zero-tolerance or suspended conduct, but the findings are still unsatisfactory, while the supplier has demonstrated reasonable and good faith compliance efforts, the company may continue the partnership under enhanced monitoring. During this period, the company will oversee the implementation of the supplier's improvement plan until all risk warning signs are resolved, with proper documentation maintained.

- 1. 提供材料不一致，但承诺整改；

Inconsistent material documentation, but with a commitment to rectify;

2. 存在 ESG 相关违规，但已制定并落实风险缓解措施；  
ESG-related violations, but with risk mitigation measures already developed and implemented;
3. 未按时支付应缴税款、费用和特许权使用费等，但已经承诺整改；  
Delayed payment of taxes, fees, or royalties, but with a pledged corrective plan;
4. 可追溯性证明材料缺少，但承诺补救；  
Missing traceability documentation, but with a commitment to remediation.

### 3.2.3 加强对维持关系供应链的监控

### 3.2.3 Strengthen monitoring of maintaining relationships in the supply chain

在维持关系期间，公司对供应商的物料采取额外措施进行管理：

During the maintenance of the relationship, the company takes additional measures to manage the materials of suppliers:

1) 单独登记来料并编号记录；

1) Register incoming materials separately and record them with numbers;

2) 单独熔炼，不得与其他客户物料混合处理；

2) Smelting separately and not mixing with other customer materials for processing;

3) 分区储存，需将单独登记的物料与其他产品分开存放；

3) Partition storage requires separate storage of separately registered materials from other products;

### 3.3 风险缓解计划的执行与持续改进

### 3.3 Execution and continuous improvement of risk mitigation plan

针对风险缓解计划的执行与监控流程，公司制定了《风险缓解程序》，确保：  
In response to the execution and monitoring process of risk mitigation plans, the company has developed a "Risk Mitigation Procedure" to ensure:

- 所有风险缓解措施设有量化指标和时间节点，以衡量执行效果；
- All risk mitigation measures are equipped with quantitative indicators and time nodes to measure their implementation effectiveness;
- 根据行业标准、法规对供应链风险评估进行定期更新；

- Regularly update supply chain risk assessment according to industry standards and regulations;
- 风险缓解进展及最终结果将定期向合规总监及高级管理层汇报，以确保持续改进和合规；
- The progress and final results of risk mitigation will be regularly reported to the Compliance Director and senior management to ensure continuous improvement and compliance;

公司通过以上系统化的风险管理策略，确保供应链符合 LBMA《负责任黄金指南》及 OECD 尽职调查框架的要求。

The company ensures that its supply chain complies with the requirements of the LBMA Responsible Gold Guidelines and the OECD due diligence framework through the above systematic risk management strategies.

#### 第四步 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**

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合规声明与要求：

Compliance Statement with Requirement:

我方已完全遵照第 4 步：安排对供应链尽职调查的独立第三方审计

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

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#### 4.1 第三独立审计

#### **4.1 Independent third-party audit**

为持续提升供应链尽职调查体系，确保其符合 LBMA 准则及 OECD 尽职调查框架最佳实践要求。2024 年，公司已委托国际权威审计机构 RCS Global 对年度供应链尽职管理体系开展独立审计。本次审计全面覆盖了公司在黄金采购、交易、风险评估及合规管理等关键环节的执行情况，重点对供应链透明度及责任采购合规性进行了专业评估。审计工作严格遵循 ISAE3000 国际鉴证业务标准（不包括历史财务信息审计或审查）。

To continuously enhance the supply chain due diligence system and ensure its compliance with LBMA guidelines and OECD Due Diligence Framework best practices, the company engaged RCS Global, an internationally recognized audit firm, in 2024 to conduct an independent audit of its annual supply chain due diligence management system.

The audit comprehensively evaluated the company's execution of key processes, including gold procurement, transactions, risk assessment, and compliance management, with a particular focus on supply chain transparency and responsible sourcing compliance. The audit was rigorously conducted in accordance with the ISAE 3000 International Standard for Assurance Engagements (excluding historical financial information audits or reviews).

#### 4.2 持续独立审计机制

#### 4.2 Continuous Independent Audit Mechanism

为确保供应链管理的合规性和透明度，公司每年将聘请具有资质的第三方审计机构对供应链尽职调查体系及财务管理进行全面审查。此项审计严格遵循 LBMA 良好交割规范的要求，重点验证供应链各环节是否符合国际反洗钱（AML）、反恐融资（CTF）标准以及企业社会责任（CSR）承诺。通过系统性的审计程序，公司定期获取专业合规审计报告，持续完善供应链风险管理体系。

To ensure compliance and transparency in supply chain management, the company hires qualified third-party audit firms to conduct comprehensive reviews of its supply chain due diligence system and financial management annually.

This audit strictly adheres to the LBMA Good Delivery Rules, with a focus on verifying whether all supply chain processes comply with: International Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF) standards and Corporate Social Responsibility (CSR) commitments.

Through systematic audit procedures, the company regularly obtains professional compliance audit reports, enabling continuous improvement of its supply chain risk management framework.

#### 4.3 透明度与合规承诺

#### 4.3 Transparency and Compliance Commitment

公司郑重承诺将全面贯彻 LBMA 及国际监管机构的审计标准，主动接受独立第三方审计机构的专业监督与指导。所有审计报告及合规文件在经高级管理层和董事会严格审议后，将依照信息披露原则向利益相关方进行完整披露，以此持续强化供应链管理体系的可信度、可追溯性与合规性建设。

The company solemnly commits to fully implementing the audit standards of the LBMA and international regulatory bodies, and will proactively accept professional oversight and guidance from independent third-party audit institutions.

All audit reports and compliance documents will undergo rigorous review by senior management and the board of directors. In accordance with the principles of information disclosure, these documents will be fully shared with stakeholders to continuously enhance the credibility, traceability, and compliance of the supply chain management system.

## 第五步 供应链尽职调查报告

### Step 5: Annual Supply Chain Due Diligence Report

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合规声明与要求:

Compliance Statement with Requirement:

我方已完全遵照第 5 步: 供应链尽职调查年度报告

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

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公司严格遵守 LBMA 负责任黄金指南第五步“供应链尽职调查年度报告”的要求, 依据福建金玉德尚精炼科技有限公司的供应链尽职调查政策进行年度合规报告的编制和公示, 公示渠道为公司官方网站, 确保供应链尽职调查报告的透明度和可获取性。

网址链接: <http://www.houdejin.com/>

The company strictly complies with Step 5 of the LBMA Responsible Gold Guidance ("Annual Supply Chain Due Diligence Report"), adhering to the supply chain due diligence policy of Fujian Jinyudeshang Refinery Technology Co., Ltd. to prepare and publish an annual compliance report. The report is publicly accessible on the company's official website to ensure transparency and availability of the supply chain due diligence report.

Website link: <http://www.houdejin.com/>

## 六、结论

### VI. Conclusion

总体而言, 2024 年福建金玉德尚精炼科技有限公司进一步完善了黄金供应链尽职管理体系, 全面识别和评估了所有供应商风险, 贯彻实施了风险管理政策, 对供应链尽职调查进行了独立的第三方审计。因此, 在截至 2024 年 12 月 31 日, 福建金玉德尚精炼科技有限公司所有交易均符合 LBMA 及 OECD 尽职调查框架的要求。

In summary, in 2024, Fujian Jinyudeshang Refinery Technology Co., Ltd. further enhanced its gold supply chain due diligence management system. The company comprehensively identified and assessed all supplier risks, rigorously implemented risk management policies, and conducted an independent third-party audit of its supply chain due diligence. As a result, as of December 31, 2024, all transactions conducted by Fujian Jinyudeshang Refinery Technology Co., Ltd. fully complied with the requirements of the LBMA Responsible Gold Guidance and the OECD Due Diligence Framework.

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 commit to continuous improvement to more effectively integrate responsible sourcing principles and responsible due diligence processes into the company's internal management systems, procedures, workflows, and practices. Any identified corrective actions will be monitored internally on a regular basis.

## 七、其他报告意见

### VII. Other reporting comments

如果本报告的使用者希望就本报告向我方提供任何反馈，请随时拨打电话 +86-591-62199999-9077 或发送电子邮件至 [chenjiaxin@decent9999.cn](mailto:chenjiaxin@decent9999.cn) 与我们联系。

If users of this report wish to provide us with any feedback on this report, Please feel free to call +86-591-62199999-9077 or email [chenjiaxin@decent9999.cn](mailto:chenjiaxin@decent9999.cn) to get in touch with us.