

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

LBMA

2024 年黄金供应链尽职管理合规报告
Due Diligence Management Compliance Report of
Gold Supply Chain 2024

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

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.

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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负责报告事宜的高级管理人员：陈玲玲/合规风控总监

Senior Management Responsible for Reporting: Lingling Chen/Director of Compliance and Risk Management

联系方式：+86-591-62199999-9077

电子邮箱：chenlingling@decent9999.cn

Contact Tel:+86-591-62199999-9077

Email: chenlingling@decent9999.cn

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。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。

Fujian Jinyudeshang Refinery Technology 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. The actual controller of the company is Decent Jewelry Group Co., Ltd., a leading enterprise in the gold and jewelry industry in China. It is mainly engaged in gold refining, the research & development, production and sales of gold jewellery, investment gold bars, and gold handicrafts. In addition, it also provides after-sales maintenance and buy-back services for gold jewellery.

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生产过程中的边角料、批发&零售网点的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，这些粗金经过熔炼变成颗粒，再用王水进行化学反应，溶解之后过滤，过滤之后的固体进行提纯，得到的溶液加入还原剂，最后得到 99.99%以上的金粉，金粉烘干经自动铸锭机熔铸变成成品金锭，金锭规格有符合上海黄金交易所标准的 1 公斤金锭、3 公斤金锭，以及 LBMA 要求的 400 盎司国际标准金锭。

The company owns a set of gold hydrometallurgical refining production line. the gold comes from the scrap materials generated during the production process in the manufacturing plants subordinate to the group, the old gold jewellery from the wholesale and retail outlets, as well as the recycled old ornaments. The gold received

at the factory has a gold content ranging from 75% to 99.9%. This crude gold is smelted into granules. Then, a chemical reaction is carried out using aqua regia. After dissolution, it is filtered. The solid matter after filtration is purified, and a reducing agent is added to the obtained solution. Finally, gold powder with a purity of over 99.99% is obtained. The gold powder is dried and then melted and cast by an automatic ingot casting machine to become finished gold ingots. The specifications of the gold ingots include 1kg gold ingots and 3kg gold ingots that meet the standards of the Shanghai Gold Exchange, as well as 400-ounce international standard gold ingots required by the LBMA (London Bullion Market Association).

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 "Enterprise providing standard gold ingots to the Shanghai Gold Exchange ". On December 12, 2023, the Shanghai Gold Exchange issued a certification certificate to our company, and we became the first gold refining enterprise that can supply standard gold ingots in Fuzhou, Fujian Province, China, .

In 2024, we were awarded a single market business honor by the Shanghai Gold Exchange: One of the Best Enterprises of Supplying Standard Gold Ingots of the Year (a total of 13 enterprises).

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、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。

The main sources of the company's gold raw materials are the old gold materials entrusted by customers for purification, as well as the recycled gold mainly from old

jewelry collected from the society. The product forms include old jewelry, damaged jewelry, and scraps generated during the production process. The main customers are the group's subordinate manufacturing plants and wholesale showrooms as well as long-term cooperation brands.

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: Establish a strong company management system

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.

1.1 公司黄金供应链尽职调查政策

1.1 Company's 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通过并出台了《黄金供应链尽职调查管理制度》, 该政策涵盖了经合组织《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》中的所有风险, 并扩展至反恐怖主义融资、环境、社会和治理的风险, 该政策已经被风险合规总监批复并以中英文的形式在公布于公司官网链接: 网址链接: <http://www.decent9999.com/groupnews/754.html> 并已经传达给所有的内部

员工，以及所有的黄金供应商。所有的传达记录也已被存档保存；

In 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 adopted and issued the "Gold Supply Chain Due Diligence Management System". This policy covers all the risks outlined in the OECD's "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas", and is extended to include risks related to anti-terrorist financing, environment, society, and governance. The policy has been approved by the Chief Risk Compliance Officer and published in Chinese and English on the company's official website at the following link:

<http://www.decent9999.com/groupnews/754.html>, It has also been communicated to all internal employees and all gold suppliers. Records of all communications have been archived for future reference.

政策要求公司及其交易方严格遵守国家关于劳动者保护权益、环境保护、公平交易等各项法律法规，积极参与供应链尽职调查工作，确保再生金来源符合LBMA 尽职调查管理要求，并作出承诺，拒绝来自侵犯人权、冲突地区、贿赂、洗钱、恐怖主义融资、非法开采、世界遗产遗址、采用汞开采等高风险地区的黄金，确保黄金的负责任采购。同时，公司建立的申诉渠道也列入了政策中以识别供应链中任何其它潜在的风险。

The policy requires the company and its trading parties to strictly comply with national laws and regulations regarding Labor protection rights, environmental protection, fair trade, etc., and actively participate in supply chain due diligence efforts to ensure that the sources of recycled gold meet the LBMA's due diligence management requirements. The company also makes a commitment to refuse gold from high-risk areas such as those involving human rights violations, conflict zones, bribery, money laundering, terrorist financing, illegal mining, World Heritage sites, and the use of mercury for mining, so as to ensure responsible gold procurement. Meanwhile, the company's established complaint channels are also included in the policy to identify any other potential risks in the supply chain.

公司每年审查一次政策的内容，根据实际情况和行业标准的要求对政策进行更新。

The Company conducts an annual review of the policy's content and updates it based on actual circumstances and industry standards requirements.

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 the principles and standards of the Extractive Industries Transparency Initiative (EITI) and pledges to adhere to the principles of the EITI.

公司建立了《反洗钱和反恐怖主义融资的规章制度》，确保公司自身不涉及洗钱和恐怖主义融资的风险。

The Company has established the Anti-Money Laundering and Counter-Terrorist Financing Policy to ensure that the Company itself is not exposed to the risks of money laundering and terrorism financing.

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》，确保公司严格遵照并执行 LBMA 关于劳动者保护的所有相关社会责任；

The Company has established the 《Requirements and Statements on Social Responsibility Behaviors Related to Workers Protection》，ensure that the company strictly adheres to and implements all relevant social responsibilities of LBMA regarding worker protection.

1.2 内部管理结构

1.2 Internal management structure

公司根据《LBMA 负责任的黄金指南》制订了《供应链尽职调查管理制度》《反洗钱规章制度》《黄金风险减缓制度》。

The company has formulated the "Supply Chain Due Diligence Management

System", "Anti-Money Laundering Regulations", and "Gold Risk Mitigation System" based on the "LBMA Responsible Gold Guidance".

根据以上规定，在公司执行董事的组织下，公司内部设立了委员会并明确了管理岗位以及对应的职责，委员会成员包括公司总经理陈佳鑫、生产负责人林兴生、质检负责人陈秀华，其中生产负责人林兴生先生和质检负责人陈秀华女士在贵金属行业拥有超过 20 年的丰富经验。在公司执行董事的授权下，他们支持供应链尽职调查流程和系统的运营与监控，并提供充足的资源支持。

Pursuant to the above regulations, under the organization of the company's executive director, a committee was established within the company and the management positions as well as their corresponding responsibilities were clarified. The committee members include Chen Jiaxin, the general manager of the company, Lin Xingsheng, the production person in charge, and Chen Xiuhua, the quality inspection person in charge. Among them, Mr. Lin Xingsheng, the person in charge of production, and Ms. Chen Xiuhua, the person in charge of quality inspection, have rich experience of over 20 years in the precious metals industry. With the authorization of the company's executive director, they support the operation and monitoring of the supply chain due diligence process and system and provide ample resource support.

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；各合规专员基于对各部门运营流程的深刻理解，能有效促进供应链合规管理过程中的沟通。公司的风控官陈玲玲女士毕业于中南财经政法大学经济学学士学位和中国政法大学民商法硕士学位，拥有经济学和法律复合背景，并持有法律职业资格证书。加入本公司之前，陈女士曾在大成律师事务所和锦天城律师事务所工作，负责处理与银行金融及中国公司法相关的法律事务。凭借多年合规风险控制经验，她拥有丰富的实践经验和足够的专业知识，能够支持供应链尽职调查流程。

The executive director authorized the committee to appoint a compliance risk control officer and to inspect and appoint members of the compliance team

established by the compliance risk control officer. The company has one compliance risk control officer and one compliance specialist in each of the raw material purchasing, finance, marketing, logistics, and compliance risk control departments. Each compliance specialist, based on a deep understanding of the operation processes of their respective departments, can effectively facilitate communication in the supply chain compliance management process. Ms. Chen Lingling, the company's risk control officer, graduated with a Bachelor's degree in Economics from Zhongnan University of Economics and Law and a Master's degree in Civil and Commercial Law from China University of Political Science and Law. She has a composite background in economics and law and holds a legal practice certificate. Before joining our company, Ms. Chen worked at Dentons law firm and JTC law firm, where she was responsible for handling legal matters related to banking finance and Chinese company law. With many years of experience in compliance risk control, she has rich practical experience and sufficient professional knowledge to support the supply chain due diligence process.

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 organizing 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.

设置一名原料采购部门（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。

Set up a compliance specialist in the raw material purchasing department (i.e., trading department) who is responsible for organizing 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.

设置一名合规风控部合规专员负责培训，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。

Set up a compliance specialist in the compliance and risk control department who is responsible for training, and assists the compliance risk control officer in formulating the construction of various systems of the company's due diligence management, carrying out internal training, implementing and supervising the implementation of compliance work in various departments.

设置两名合规风控专员于营销部，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。

Set up two compliance and risk control specialists 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.

设置一名合规专员于财务部，负责供应商委托提纯和回购业务的合同审批，从财务专业的角度把控合同和资金；对相关的业务、资金活动进行监督；公司财务规定不允许有任何形式的现金交易，故 2024 年公司所有的支付和接收均通过银行转账方式完成，未进行任何现金收付。

Set up a compliance specialist in the finance department who is responsible for the contract approval of supplier commissioned purification and repurchase business, controlling contracts and funds from the perspective of financial expertise; and supervising the related business and financial activities, The company's financial regulations prohibit any form of cash transactions , Therefore, in 2024, all payments and receipts of the company were made through bank transfers and no cash receipts or payments were made.

2024 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。

In 2024, Fujian Jinyudeshang Refinery 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.

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，要求供应商承诺原料合法合规，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, require suppliers to commit to the legality and compliance of raw materials, in accordance 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 LBMA Responsible Gold Guidance. 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 purity. 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

我司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，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。

All the transportation work of our company's gold containing raw materials is undertaken by the professional gold security transportation team under the parent company Decent Jewelry Group Co., Ltd. This transportation team is responsible for picking up raw materials from various manufacturing centers, sales outlets, and repurchase outlets under the group to the refining plant. The Company has set up a compliance specialist, in this process, the compliance specialist buttresses the Group's transport team, further eliminates risks based on the incoming and outgoing addresses, tracks the waybill number, 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 buyback 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 buyback gold 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 gold materials entrusted for processing are transported to the manufacturing centers and sales outlets of various subsidiaries through the internal security transportation team of the group after processing. 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 deliver, 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.

1.3.1.3 过程监控

1.3.1.3 Process monitoring

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。每一批出库标准金锭和加工完成的成品金料均分配唯一编号，并有出库台账记录，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，截止 2024 年度受托提纯约 10.3 吨，业务量占比约为 75%，剩余约 25%(3.55 吨)均为回购业务。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，回购旧金后提纯铸锭的均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。

The company has established a set of supply chain traceability system, and each batch of raw materials transferred to our company has a ledger record, including supplier name, transfer date, transfer weight, completion, etc. Each batch of outbound standard gold ingots and processed finished gold materials are assigned a unique number and recorded in the outbound account, including the outbound date, outbound weight, etc. All outbound flows audited by the company are controllable in terms of risk. By 2024, the commissioned purification volume is about 10.3 Tons, accounting for about 75%, and the remaining about 25% (3.55tons)business volume is

repurchase business. Most of the gold materials refined and processed by Fujian Jinyudeshang Refinery Technology Co., Ltd. flow to jewelry sales centers and jewelry processing plants, and the part of the old gold purified ingots repurchased flows to the Shanghai Gold Exchange. During the cooperation, the compliance teams of all departments formed a good communication mechanism to conduct timely assessment of possible risk events in the process.

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、环评等资料。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, environmental assessment 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 培训

1.4 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，由合规部制定年度培训计划，组织公司重点岗位各合规专员及工厂管理人员、生产人员对供应链尽职调查管理的要求、内容以及 LBMA 负责任的黄金、指南进行培训，确保供应链尽职调查管理工作落到实处。2024 年我公司内部共开展了 3 次供应链尽职管理体系相关内容的培训，培训时间和内容包括：3 月 26 日就《LBMA 负责任的黄金指南-第九版》进行培训，8 月 15 日就《LBMA 黄金供应链尽职调查管理制度》和尽职调查实操技能进行培训，12 月 18 日就风险评估资源的使用进行培训。每次培训时长通常为一到两天（8-16 小时），均留档保存培训记录。

The company will incorporate supply chain due diligence management training into its annual training plan every year. The Compliance Department will formulate the annual training plan and organize compliance specialists, factory managers and production personnel in key positions of the company to conduct training on the requirements and contents of supply chain due diligence management as well as LBMA responsible gold and guidelines, Ensure supply chain due diligence management is taken in place . In 2024, our company has carried out 3 training related to supply chain due diligence management system. The training time and contents include: Training on the LBMA Responsible Gold Guidance - Ninth Edition on March 26, training on the LBMA Gold Supply Chain Due Diligence Management System and due diligence practical skills on August 15, and training on the use of risk assessment resources on December 18.

Each training session usually lasts one to two days (8-16 hours), and training records are kept on file.

1.5 强化合作供应商尽职调查能力建设培训

1.5 Strengthen the due diligence capacity building training of cooperating suppliers

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黄金负责任供应链尽职调查指南》并扩展至环境和可持续性责任的供应商。

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 environmental and sustainability responsibilities.

公司将黄金供应链的政策与要求通过电子邮件等方式传达给相关供应商，提高供应链供应商建立尽职调查能力，支持 EITI 原则。公司与供应商都要严格遵守合同和法律的规定，协助供应商更大程度的建立尽职调查能力。公司在 2024 年已经组织供应商进行了尽职调查的培训以提高他们在尽职调查上的能力，培训签到表和照片均已保留并存档。

The company will communicate the policies and requirements of the gold supply chain to relevant suppliers through email and other means to improve the due diligence capacity of supply chain suppliers and support the EITI principle. Both the company and the suppliers should strictly abide by the provisions of the contract and the law, and assist the supplier to establish a greater degree of due diligence capability. In 2024, the company has organized due diligence training for suppliers to improve their ability in due diligence, and the training sign-up sheets and photos have been kept and archived.

公司所有供应商都签署《遵守供应链政策的承诺书》，以确保黄金来源合法、合规，符合 LBMA 规定。对于公司销售的大客户要备案其下游客户的发票，规避偷逃税款风险。

All of the company's suppliers sign a Commitment to comply with the Supply Chain Policy to ensure that gold is sourced legally and in compliance with LBMA regulations. For the company's sales of large customers to record the invoices of its downstream customers, to avoid the risk of tax evasion.

1.5.1 内部沟通

1.5.1 Internal communication

合规小组内部每季度至少组织一次季度讨论，就当季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。

The compliance team shall organize at least one quarterly discussion within the organization to provide internal updates on supply chain related information for the current season. 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.

1.5.2 外部沟通

1.5.2 External communication

2024 年我公司组织 1 次供应商培训,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)。合作期间我司会督促业务员不定期地将更新的相关信息及资料通过网络工具(例:微信)实时传达给我们的供应商,每年至少开展 1 次尽职调查,通过电话、微信及面谈方式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 2024, our company organized one supplier training sessions to promote the relevant content of the supply chain due diligence management system, helping suppliers to gain a deeper understanding of the "Gold Supply Chain Due Diligence

Management System" and related toolkits, including LBMA's regulatory requirements for gold, reliable gold supply chain due diligence management policies, and gold procurement process risk management (risk pre control, risk assessment, monitoring, and communication mechanisms, etc.). During the cooperation period, our company will urge our sales representatives to regularly communicate updated relevant information and materials to our suppliers in real time through online tools (such as WeChat). Conduct due diligence at least once a year. Understand the implementation of the supplier's supply chain due diligence management system through telephone calls, WeChat conversations, and face-to-face interviews. Provide guidance for areas that are not perfect, and offer more cooperation opportunities to suppliers who have carried out the management system excellently.

1.6 机密申诉机制

1.6 Confidential complaint mechanisms

公司建立了申诉机制，并通过我们的官方网站：
<http://www.decent9999.com/groupnews/754.html> 公布电话和邮箱，允许员工和外部利益相关者表达关于黄金负责任供应链与采矿、贸易、加工和出口情况有关的疑虑以及对供应链或任何新识别出的风险的担忧。公司建立了完善的申诉处理程序，并在整个申诉过程中保护申诉方的隐私，对举报人信息保密，杜绝任何行为的打击报复。

公司成立了投诉处理团队，一般处理流程如下：收到投诉后，团队在 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，团队应在受理投诉后 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。

The company has established an appeal mechanism and through our official website: <http://www.decent9999.com/groupnews/754.html> Publish phone numbers and email addresses, allowing employees and external stakeholders to express concerns about the responsible supply chain of gold related to mining, trade, processing, and exports, as well as concerns about the supply chain or any newly identified risks. The company has established a comprehensive appeal handling procedure and protected the privacy of the appellant throughout the entire appeal process, keeping the informant's information confidential and preventing any retaliation.

The company has established a team to solve complaint matters, and the general handling process is as follows: Upon receiving a complaint, the team shall acknowledge receipt within 10 working days and conduct a review to either accept or reject the complaint. If the complaint is rejected, the reason for the rejection shall be explained to the complainant and recorded on file. For significant complaints, the team shall, within 30 working days after accepting the complaint, investigate, review, and adjudicate the complaint content. The complaint information will be anonymized, and any content that may reveal the complainant's identity will be removed before informing stakeholders and proceeding with the investigation. In cases where the complaint is complex and requires more time for investigation, the Grievance Handling Team shall take reasonable measures, including convening one or more meetings to make a reasonable decision, requesting additional information from the complainant or others and consulting experts. After the investigation, the decision on the complaint shall be communicated in writing to both the complainant and stakeholders. The content of the complaint decision should include: the decision itself,

the date it was made, and any recommendations.

2024 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 FY2024.

1.7 环境、社会责任和治理（ESG）因素

1.7 Environmental, Social responsibility and Governance (ESG) Factors

公司充分遵守当地政府的环境、健康、安全和劳工法规及公司政策。

The company fully complies with the local government's environmental, health, safety, and labor regulations and company policies.

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。

In terms of environment, the company has established an environmental management system and obtained a valid certificate of ISO14001. We have developed an environmental management manual and plan to manage environmental risks in the company's production and operation, particularly in managing air, water, and land pollution.

在劳工法规方面，建立了《关于劳动者保护相关社会责任行为的要求和声明》和《员工手册》。福建金玉德尚精炼科技有限公司禁止任何限制劳动自由的行为，如扣押身份证件、收取押金或抵押物、扣押工人工资、强迫搜身、限制工人出入工厂和强迫加班等；公司也不支持任何形式的强迫劳动，包括抵债劳动、奴役劳动、以惩罚或恐吓手段的、被强迫的或非自愿的劳动；并明确定义了员工工作时间，薪酬，奖励制度。

针对供应商，公司要求合规部每年以电话或聊天软件等方式对不同地域的供应商传达《关于劳动者保护相关社会责任行为的要求和声明》并对其执行情况进行了解和监督，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。我们供应商集中分布在中国福建省、广东省、浙江省等低风险地区，2024 年公司通过对供应商的强迫劳动风险的尽职调查，并通过国家企业信用信息公示网站，企查查 App 等公开网站查询，所有供应商企业未有违反《中华人民共和国劳动法》和强迫劳动的信息。

In terms of human rights, the "Requirements and Declaration on Social Responsibility Behaviors Related to the Protection of Workers" and the "Employee Handbook" have been established. Fujian Jinyudeshang Refinery Technology Co., Ltd. prohibits any acts that restrict labor freedom, such as detaining identity documents, collecting deposits or collateral, withholding workers' wages, forcing body searches, restricting workers' from entering and leaving the factory, and forcing overtime work, etc. The company also does not support any form of forced labor, including bonded labor, slave labor, labor obtained through punishment or intimidation, forced or involuntary labor. Moreover, the company has clearly defined employees' working hours, compensation, reward system.

Regarding suppliers, the company requires the Compliance Department to communicate the "Requirements and Declaration on Social Responsibility Behaviors Related to the Protection of Workers" to suppliers in different regions by phone or chat software(Wechat) every year, and to understand and supervise their implementation as a prerequisite for cooperation with Fujian Jinyudeshang Refinery Technology Co., Ltd. Our suppliers are concentrated in low-risk areas such as Fujian Province, Guangdong Province, Jiangsu Province etc. In 2024, the company conducted due diligence on the forced labor risks of suppliers, and through inquiries on public websites such as the National Enterprise Credit Information Publicity Website and Qichacha App, there was no information indicating that any of the

supplier enterprises had violated the Labor Law of the People's Republic of China or engaged in forced labor.

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, 2024 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。

In terms of business integrity and ethical management, the company supports the initiative to implement the Extractive Industries Transparency Action Plan and will not be able to support the purchase of mined gold by state-owned enterprises operating in EITI countries during the 2024 period.

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 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.

2.1 识别受冲突影响和高风险区域

2.1 Identify the conflict-affected and high-risk areas

公司严格遵守 LBMA 黄金责任指南第二步“供应链风险的识别与评估”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、ASM、再生黄金的风

险进行识别和评估。以充分识别黄金供应链中的零容忍风险和高风险，并对识别出的风险进行评估和管理。

The company strictly adheres to the requirements of the second step of the LBMA Responsible Gold Guidance, "Identification and Assessment of Supply Chain Risks," and considers adverse ESG factors in the gold supply chain of refiners. Develop the "Supply Chain Risk Assessment Form", clarify the criteria for judgment, and fully assess the locations, suppliers, materials ASM、Identify and assess the risks associated with recycled gold. To fully identify zero tolerance risks and high risks in the gold supply chain and evaluate and manage the identified risks.

在公司制定的所有相关风险识别与评估表中，主要引用了以下的风险评估资源来识别公司供应链中的受冲突影响和高风险区域（CAHRAs）：

The Company's Identification Procedures for Conflict-Affected and High-Risk Areas (CAHRAs) primarily references the following resources to identify the CAHRAs within the company's supply chain:

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. Office of the United Nations High Commissioner for Human Rights or equivalent
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.

上述引用的资源确保至少每年更新一次，或在上述资源更新时进行受冲突影响和高风险区域（CAHRAs）的重新评估。

The resources cited above should be updated at least once a year or reassessed for conflict-affected and High-risk Areas (CAHRAs) when the resources are updated.

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，参考制裁名单（美国、英国、欧盟、联合国及相关制裁名单）、多德—弗兰克法案第 1502 条、欧盟 CAHRA 名单、海德堡冲突晴雨表、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 LBMA Responsible Gold Guidance, 9th Edition and OECD Annex 2, taking into account unfavorable 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 sanction lists (US, UK, EU, UN and related sanction lists), Section 1502 of the Dodd-Frank Act, the EU CAHRA list, the Heidelberg Barometer, the Fragile States Index or similar index, the Office of the United Nations High Commissioner for Human Rights (OHCHR) or the equivalent, the Financial Action Task Force (FATF) (including relevant country/region reports), the Reliable market intelligence on high risk gold centers/transit centers and high money laundering risk countries/regions.

2.2.1 建立尽职调查流程

2.2.1 Set up due diligence process to identify supply chain risks

合作前，对于所有供应商进行供应链的尽职管理调查，填写 KYC 问卷，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、原料类型及来源、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。

Before cooperation, all suppliers shall conduct supply chain due diligence management survey, fill in KYC questionnaire, require partners to provide relevant qualification documents that meet the requirements of gold supply chain due diligence management system, and investigate the basic information of suppliers, shareholders' information, types and sources of raw materials provided, types of planned refined precious metals, settlement methods and other information. And extend the supply chain investigation to the upstream of suppliers as far as possible, and refuse to cooperate with suppliers involved in zero-tolerance supply chain and 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，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。

In the process of cooperation, understand and evaluate the dynamics of suppliers' business activities, always pay attention to whether each physical flow, information flow and capital flow is matched and compliant, and establish supplier files and raw material ledger. Keep track of supplier information. Give full play to the role of the network, and use Tianyancha, China Trial Information Network, IPE and other websites to inquire about the supplier's qualification, breach of trust, litigation and punishment.

2.2.2 风险评估标准

2.2.2 Risk Assessment Criteria

根据最新版本的 LBMA 负责任黄金指南的要求，以及公司采购的物料类型（再生金），公司要识别再生金的供应链中是否存在以下零容忍风险和高风险，这包括：

In accordance with the latest version of the LBMA Responsible Gold Guidance, and considering the material types procured by the Company (recycled gold), the Company is required to identify zero-tolerance risks and high risks in the supply chains of recycled gold, this includes:

- 零容忍的风险
- **Zero-Tolerance Risk**

1. 开采金来自被指定为世界遗产地的地区；

2. 以违反国际制裁(包括但不限于联合国、欧盟、英国和美国制裁)的方式采购再生金。

3. 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，或曾严重侵犯人权，直接或间接支持非法国家武装组织。

1. Mining gold comes from areas designated as World Heritage sites;
2. Procurement of recycled gold in violation of international sanctions (including but not limited to sanctions against the United Nations, the European Union, the United Kingdom, and the United States)
3. The trading parties in the supply chain of recycled gold, other known upstream companies, or their Ultimate Beneficial Owners(UBOs)are identified as known money launderers, fraudsters, or terrorists, or have been involved in serious human rights violations, or directly or indirectly support illegal non-state armed groups.

● 高风险

● High Risks

1. 基于位置的高风险，再生金：

- a. 来自于 CAHRA，或曾在该 CAHRA 过境或通过该 CAHRA 运输
- b. 据称来自已知或合理怀疑来自 CAHRA 的黄金过境的国家/地区及/或据称来自黄金出口量有限的国家/地区

1. Based on location-based risk, recycled gold:

- a. Originating from a CAHRA, or known to have transited or been transported through a CAHRA.
- b. Allegedly originating from countries/regions known or reasonably suspected to

transit gold from a CAHRA and/or allegedly originating from countries/regions with limited gold export volumes.

2. 基于供应商的风险，交易对手方或其他已知的上游公司：

- a. 在具有高洗钱风险的国家/地区运营
- b. 具有符合基于位置高风险标准的股东或 UBO 或其他黄金供应权益
- c. 具有身为政治人物 (PEP) 的 UBO
- d. 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)
- e. 已知在过去 12 个月曾从高风险国家/地区采购黄金
- f. 与供应链中的供应商或对手方直接有重要且无法解释的运输路线

2. Based on the supplier's risk, counter parties or other known upstream companies:

- a. Operating in countries/regions with high money laundering risks.
- b. Shareholders or UBOs or other gold supply equity that meet location-based high-risk criteria.
- c. Having UBO as a politically exposed person(PEP)
- d. Engaging in high-risk commercial activities(such as arms, gambling and entertainment, antiques and art, sects and their leaders).
- e. Known to have purchased gold from high-risk countries/regions in the past 12 months.
- f. There are significant and unexplainable transportation routes directly with suppliers or counterparties in the supply chain.

3. 基于物料类型的风险，再生金：

- a. 来自具有高风险供应链的中间精炼厂或交易商或从具有高风险供应链的中间精炼厂采购的交易对手方

3. Based on the risk of material type, recycled gold

- a. From intermediate refineries or traders in high-risk supply chains or counterparties purchasing from intermediate refineries in high-risk supply chains

2.3 评估供应链风险

2.3 Evaluate the results of supply chain risk assessment

2.3.1 位置风险评估

2.3.1 Location risk assessment

2024 年度我们的主要供应商分别位于福建省、广东省和江苏省，根据上述 CARHA 的识别程序，判断中国为低风险区域，我们的所有供应商位置均位于中国大陆，因此判断所有供应商的位置都是低风险；

In 2024, our main suppliers were located in Fujian Province, Guangdong Province and Jiangsu Province respectively. According to the above CARHA identification program, All our suppliers are located in the Chinese Mainland, so it is judged that all suppliers are located in low-risk areas;

2.3.2 供应商风险评估

2.3.2 Supplier Risk Assessment

合作前，我们利用中国政府权威的企业公示系统、行业背景调查和现场走访的形式对供应商做尽职调查管理。调研并核实供应商信息包含：KYC 表格、企业运营所在地，营业执照、工商执行报告、财年报告、股东结构、物流凭证等，综合并根据以上资料对供应商进行风险评估，截至 2024 年，所有供应商为低风险；

Before cooperation, we conducted due diligence management on suppliers through the authoritative corporate disclosure system of the Chinese government, industry background checks, and on-site visits. Conduct research and verify supplier information, including KYC forms, location of business operations, business license, business execution report, fiscal year report, shareholder structure, logistics records, etc. Conduct a comprehensive risk assessment of suppliers based on the above

information. As of 2024, all suppliers are classified as low-risk;

2.3.3 原料风险评估

2.3.3 Resources Risk

基于中国对贵金属的严格管理及进出口政策，首先我们供应商所有运营和生产过程中使用的黄金均为纯度在 75.0%-99.9%的再生金并全部来自于中国境内。其次我们通过对供应商的采购渠道确认、客户追溯、物流过程追溯、财务发票以及拒绝现金交易等形式来确保所有供应商的原料没有任何来自高风险地区、冲突矿产以及涉嫌洗钱和恐怖融资的黄金；截至 2024 年 12 月 31 日，我们未从海外进口任何含金材料、亦未从任何中间精炼商购买或接收材料、所有供应商的来料均为其日常运营和生产中所产生的旧、废黄金首饰以及生产过程中的边角料和废料。

Based on the strict management and import and export policies of the Chinese government on precious metals, Firstly, all the gold used in our supplier's operations and production processes is recycled gold with a purity of 75.0% -99.9%, and all of it comes from within China. Secondly, we employ multiple safeguards to ensure that none of our suppliers' raw materials originate from high-risk regions, conflict-affected areas, or involve gold linked to money laundering, terrorist financing, or controversial sources. These measures include: verifying suppliers' procurement channels, conducting customer and logistics traceability audits, enforcing financial invoicing rules, and prohibiting cash transactions. As of December 31, 2024, we have not imported any gold containing materials from overseas, nor have we purchased or received materials from any intermediate refiners. All suppliers' incoming materials are old and waste gold jewelry generated in their daily operations and production, as well as scraps and waste materials in the production process.

年终合规小组根据收集的信息整理 2024 年度供应商评估报告，并于 2025 年第四周工作日完成意见交换，形成年度供应链综合报告汇报给合规风控官，合规

风控官负责审核报告信息的真实性、有效性和完整性，确认后签字并向董事指定的委员会汇报。

At the end of the year, the compliance team has collated the 2024 supplier evaluation report based on the collected information, and complete the exchange of views in the working day of the 4th week in 2025. The annual supply chain comprehensive report will be formed and submitted to the compliance risk control Officer, who will be responsible for reviewing the authenticity, effectiveness and integrity of the report, signing the confirmation and reporting to the committee designated by the directors.

2024 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。

During the year 2024, the company completed all supplier due diligence and found no zero-tolerance and high-risk supply chains.

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，2024 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 recycled 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 recycled gold was identified during FY2024.

综上，2024 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 FY2024, and all procurement was conducted in an orderly and compliant manner.

2.4 关于强化尽职调查的说明

2.4 Note on enhanced due diligence

首先，识别并判断高风险供应链的要素，包括开采黄金的高风险和识别回收黄金的高风险。公司设定有针对高风险的《强化尽职调查程序（第一版）》，若触发 EDD，必须对黄金产地进行实地调查/考察。强化调查程序适用于 LSM 黄金供应链、ASM 黄金供应链、来自中间精炼商的高风险再生金供应链。

针对来自其他来源的高风险回收黄金，应采取的增强尽职调查措施包括但不限于：

- 检查位于高风险地区的每家黄金回收公司及其参与供应链的贸易对手到冶炼厂（包括运输商）的政府关注名单信息。
- 采访选定的管理人员和现场人员，以确定并确认供应链尽职调查实践、采购、反洗钱和反恐融资程序；
- 考虑交易方对供应链尽职调查的能力是否与风险成比例；
- 考虑评估交易对手的风险分类方法的适当性。
- 评估尽职调查记录，确认该程序是否按照对方的供应链尽职调查政策进行，并考虑商业敏感信息。
- 评估对手方高风险供应链的实地考察方法，并适当考虑商业敏感信息。

First, identify and judge the elements of high-risk supply chains, including the high-risk of mined gold and of recognizing recycled gold. The company has established an Enhanced Due Diligence Procedure (First Edition) for high-risk situations, and if EDD is triggered, on-site investigation/investigation of the gold production area must be conducted. The enhanced investigation procedure is applicable to LSM gold supply chains, ASM gold supply chains, and high-risk

recycled gold supply chains from intermediate refiners.

Enhanced due diligence measures should be taken for high-risk gold recovery from other sources, including but not limited to:

- Check the government attention list information of each gold recycling company located in high-risk areas and its trading partners involved in the supply chain to smelters (including transporters).
- Interview selected management and on-site personnel to identify and confirm supply chain due diligence practices, procurement, anti-money laundering, and counter-terrorism financing procedures;
- Consider whether the ability of the trading party to conduct due diligence on the supply chain is proportional to the risk;
- Consider evaluating the appropriateness of risk classification methods for counterparties.
- Evaluate due diligence records, confirm whether the procedure is conducted in accordance with the counterparty's supply chain due diligence policy, and consider commercially sensitive information.
- Evaluate on-site inspection methods for high-risk supply chains of counterparties, and appropriately consider commercially sensitive information.

其次，组建团队。一旦我们的供应链合作伙伴涉及高风险因素，我们将立即启动增强型尽职调查流程，并成立专业团队。我们选择具有丰富经验和专业技能的人员来组建团队，团队成员包括财务专家、法律顾问、供应链专家、风险管理专家、数据分析师、现场访问人员等。财务专家负责收集和分析供应链的财务数据，包括采购、库存、销售和成本等，以识别潜在的风险和问题。法律顾问负责提供法律意见和指导，确保调查过程符合法律法规要求，并处理可能涉及的法律问题。供应链专家负责了解黄金供应链的运作模式、供应商选择、物流和质量控

制等方面，评估供应链的风险和脆弱性。风险管理专家负责评估供应链的风险水平，制定相应的风险应对措施，包括风险转移、减轻和监控等。数据分析师负责收集和分析相关数据，运用数据分析工具和方法，对供应链的风险进行定量和定性分析。现场访问人员由与供应商没有任何利益冲突的胜任员工进行实地考察，考察人员必须承诺如实、准确地报告；

Second, build a team. Once our supply chain partners are involved in the high-risk factors, we will immediately launch an enhanced due diligence process and set up a professional team. We select personnel with rich experience and professional skills to build our team, the team members include financial experts, legal advisors, supply chain experts, risk management experts, data analysts, on-site visitors, etc. Financial experts are responsible for collecting and analyzing financial data of the supply chain, including procurement, inventory, sales, and costs, to identify potential risks and issues. Legal advisors are responsible for providing legal advice and guidance, ensuring that the investigation process complies with legal and regulatory requirements, and addressing potential legal issues. Supply chain experts are responsible for understanding the operational mode, supplier selection, logistics, and quality control of the gold supply chain, and evaluating the risks and vulnerabilities of the supply chain. Risk management experts are responsible for evaluating the risk level of the supply chain and developing corresponding risk response measures, including risk transfer, mitigation, and monitoring. Data analysts are responsible for collecting and analyzing relevant data, using data analysis tools and methods to conduct quantitative and qualitative analysis of supply chain risks. On site visiting personnel shall conduct on-site inspections by competent employees who have no conflict of interest with the supplier, and the inspectors must promise to report truthfully and accurately;

第三，制定调查计划。我们需要根据具体的风险类别制定调查内容，具体如下：

- 根据第二步的风险识别标准，确认高风险开采和回收黄金的调查内容
- 制定现场调查计划

Third, develop an investigation plan. We need to develop investigation content based on specific risk categories, as follows:

- According to the risk identification criteria of the second step, confirm the investigation content of high-risk mined and recycled gold.
- Make an on-site investigation plan.

我们需要在任何交易发生之前，或者至少在业务关系开始后的 6 个月进行实地考察。

依据第 2 步的供应链风险评估标准，我们将会对触发 EDD 的供应链展开实地调查，调查内容包含：

- 旨在证实记录在案的 KYC 信息；
- 重点调查威胁融资风险以及具体的供应链尽职调查结果；
- 由与供应商没有任何利益冲突的胜任员工进行实地考察，考察人员必须承诺如实、准确地报告；
- 咨询相关的内部和外部利益相关方（例如：地方主管机构、上游公司、民间社会组织或受影响的第三方）
- 根据问题的数量和严重程度予以跟进，并记录在改进计划中；

We need to conduct on-site inspections before any transactions occur, or at least 6 months after the start of the business relationship.

Conduct on-site investigation of the supply chain based on the supply chain risk assessment criteria in Step 2, which includes:

- Intended to verify the documented KYC information;

- Focus on investigating the threat financing risks and specific supply chain due diligence results;
- Conduct on-site inspections by competent employees who have no conflict of interest with the supplier, and the inspectors must promise to report truthfully and accurately;
- Consulting with relevant internal and external stakeholders (such as local regulatory agencies, upstream companies, civil society organizations, or affected third parties)
- Follow up on the number and severity of issues and record them in the improvement plan;

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，以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，我司的合作伙伴和潜在合作客户均位于中国（低风险地区），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，经统计，2024 年我们收到的黄金原料 75%是客户委托进行提纯和加工的，25%是黄金回购业务，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红旗风险，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. According to statistics, 75% of the gold raw materials we receive in 2024 are commissioned by customers for purification and processing, and 25% are for gold repurchase business. All commissioned purified gold will be returned to suppliers, and all repurchased gold will be cast into ingots and delivered in the Shanghai Gold Exchange. The entire business process is legal and compliant, and we have conducted comprehensive due diligence on 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.

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.

公司将其供应链分为以下四类：零容忍黄金供应链、高风险供应链、中风险供应链和低风险供应链。

The company categories its supply chain into zero tolerance gold supply chain, high risk supply chain, medium risk supply chain and low risk supply chain.

3.1 福建金玉德尚精炼科技有限公司风险管理策略

3.1 Fujian Jinyudeshang Refinery Technology Co.,Ltd. Risk management strategy

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 organizations, 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 Confirm suspended relationships and reduce risk while suspending trading

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 hold off on purchasing gold-containing materials from suppliers 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 Confirm to maintain relationship with improvement plan and reduce 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 the enhanced due diligence fails to uncover potential issues or a small number of issues, including bribery, non-deceptive misrepresentation of the origin of the gold, non-compliance with government-mandated tax, fee and royalty policies, and serious violations of environmental, health, safety, labor and community-relevant local legislation, And/or the risk of environmental, social and management issues that are highly likely to have a high degree of adverse impact, the supplier can provide a risk solution with a clear improvement plan and timetable, and the Company may enter into normal cooperation with the supplier after review by the Company's compliance team and approval by the Compliance Risk control officer. The risk solution should include clear performance objectives, performance measures based on quantitative and qualitative analysis, and a reasonable completion date.

3.2 风险管理计划和监控

3.2 Risk management plan and monitoring

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。

Apply the principle of good faith, take measurable steps with counterparties, monitor performance, periodically reassess risk and report 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 organizations, 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2024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 2024 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 Jinyudeshang Refinery Technology Co., Ltd, warehousing must be confirmed by the signature of the Logistics Compliance Officer of Fujian Jinyudeshang Refinery Technology Co., Ltd, and payment must be approved by the Compliance Officer of

Fujian Jinyudeshang Refinery 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。

The Compliance Risk Control Officer submits quarterly reports to the committee appointed by the Executive Director based on the actual situation of due diligence management of the gold supply chain of Fujian Jinyudeshang Refinery Technology Co., LTD. This report summarizes the operation of the due diligence management system of gold supply chain of Fujian Jinyudeshang Refinery Technology Co., Ltd. in this quarter, and puts forward the shortcomings and improvement measures.

2024 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 2024, Fujian Jinyudeshang Refinery 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 RCS Global 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）。RCS Global 的鉴证报告见附件。

Fujian Jinyudeshang Refinery Technology Co., Ltd. hired RCS Global as assurance provider. 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 RCS Globals' 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《2024 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 Guidance, Fujian Jinyudeshang Refinery Technology Co., Ltd. prepared and submitted the 2024 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《2024 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 2024 or download access to it via the company's official website.

<http://www.decent9999.com/groupnews/754.html>

四、结论

IV. 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，识别和评估了供应商的相关风险，贯彻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 2024 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 2024, Fujian Jinyudeshang Refinery Technology Co., Ltd. further improved the gold supply chain due diligence management system, identified and assessed the supplier's related risks, implemented the risk management strategy, and conducted an independent third-party audit of the supply chain due diligence.

Therefore, as of December 31, 2024, Fujian Jinyudeshang Refinery Technology Co., Ltd. was in full compliance with the LBMA Responsible Gold Guidance.

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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