

# LBMA Responsible Sourcing Supply Chain Management Policy

## 负责任黄金采购供应链管理政策

福建金玉德尚精炼科技有限公司作为伦敦金银交易市场协会（LBMA）的申请认证会员，为全面实施 OECD 关于在冲突地区及高危地区供应链尽职调查指导方针，我公司现已推行 LBMA RGG 尽责管理体系。

As an applicant for the Gold Good Delivery Refiner Status of the London Bullion Market Association (LBMA), Fujian Jinyudeshang Refinery Technology Co., Ltd. has implemented the LBMA RGG due diligence management systems to fully comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

为配合我公司尽职调查管理体系的顺利执行，各供应商应遵守 LBMA RGG 管理体系的各项要求，并承诺向我公司提供的所有类别黄金产品的收购均为合法，不涉及以下情况：

To ensure the effective execution of our due diligence management system, all suppliers must adhere to the requirements of the LBMA RGG frameworks and commit that all gold materials supplied to our company are legally sourced and free from the following risks:

1. 与黄金开采、运输和交易有关的系统化、广泛化的侵犯人权行为，这包括：

1. Systematic or widespread human rights violations related to the mining, transportation, or trading of gold, including:

a)任何形式的酷刑、或不人道和有辱人格的待遇

a)Torture, inhuman, or degrading treatment.

b)强迫或强制性劳动

b)Forced or compulsory labor.

c)最恶劣形式的童工

c)The worst forms of child labor.

d)广泛的性暴力或其他严重侵犯人权的行为

d)Widespread sexual violence or other severe human rights abuses.

e) 战争罪，反人类罪或种族灭绝罪

e) War crimes, crimes against humanity, or genocide.

2、直接或间接的支持非政府武装集团、公共或私人安全部队，购买黄金或提供协助的（参考 OECD 冲突影响地区和高风险地区矿产供应链尽职调查指南黄金附录中的定义）；

2.Direct or indirect support to non-state armed groups, public/private security forces, or purchasing gold linked to such entities (as defined in the OECD Guidance Annexes for Gold ).

3、贿赂而来或者是掩盖黄金真实来源；

3. Bribery or concealment of the true origins of gold.

4、存在洗钱或自高风险、冲突地区采购黄金；

4. Money laundering or sourcing gold from high-risk or conflict-affected areas.

5、存在恐怖主义融资；

5. Terrorist financing.

6、存在加剧冲突；

6. Exacerbation of conflicts.

7、可能开采黄金利用汞生产而得；

7. Use of mercury in gold mining or production.

8、对环境的影响

8. Environmental impacts:

a) 可能不遵守环境和可持续发展法律要求，开采黄金源于世界遗产遗址或国内生态自然保护区；

a) Non-compliance with environmental and sustainable development laws, including mining in UNESCO World Heritage Sites or domestic ecological reserves.

b) 存在矿产资源开发过程中引起的土壤侵蚀、水土流失、土地沙漠化。地面沉降、塌陷，山体崩塌、滑坡、泥石流等地质灾害；

b) There are geological disasters such as soil erosion, water loss and soil erosion, land desertification, ground subsidence, collapse, mountain collapse, landslides, and mudslides caused by the development of mineral resources.

c) 存在废渣、废水、废气排放对水体、土壤、空气的污染。对野生动植物资源和自然地质地貌景观的破坏、危及公民健康和财产损失。

c) There are pollutions to water bodies, soil, and air caused by the discharge of waste residue, wastewater, and exhaust gas. These pollutions damage wildlife resources and natural geological and geomorphic landscapes, endanger citizens' health, and cause property damage.

d) 对有毒有害化学物品的安全存储

d) Unsafe storage of toxic or hazardous chemicals.

9. 对劳工的管理，包括工人的薪酬、工作时间、集体谈判、歧视，多样性、纠纷和工人权益保障；

9. Labor management failures, including unfair wages, excessive working hours, discrimination, lack of collective bargaining, or violations of worker rights.

10. 社区参与和管理方案

10. Lack of Community engagement and management programs.

11. 管理商业诚信和道德行为，我公司支持并遵守采掘业透明度倡议（EITI）。

11. Breaches of business integrity and ethics, including non-compliance with the Extractive Industries Transparency Initiative (EITI).

为了确保上述风险的充分识别，我公司承诺并确保：

To ensure effective risk identification and management,  
the company commits to:

1、委任负责任供应链的合规风险总监以及合规风险专员负责黄金的风险识别和管理。

1. Appoint a Compliance Risk Officer and dedicated compliance team to oversee gold risk management.

2、对黄金的每一笔来源按照 LBMA 的要求进行充分的识别与记录，确保每一笔物料的可追溯性。

2. Fully trace and document the origin of all gold in accordance with LBMA requirements.

3、建立高风险地区和高风险供应链的识别流程，确保供应链中的上游风险被充分的识别。

3. Establish processes to identify high-risk areas and supply chains, ensuring all risks are comprehensively addressed.

4、每年对负责黄金尽职调查管理体系的相关员工进行负责任采购采购的相关培训，并保留相应的培训记录。

4. Provide annual training on responsible sourcing to relevant employees and maintain training records.

5、对黄金的供应商进行充分的了解和调查，确保供应商及其最终受益人未被列入任何制裁清单。

5. Conduct thorough due diligence on suppliers and their ultimate beneficial owners (UBOs) to exclude those on sanctions lists.

6、建立负责任采购申诉渠道并公布在公司网站，以确保任何潜在的风险和或暂未识别的风险被充分的识别。

6. Establish a responsible sourcing grievance mechanism, publicly accessible on the company website to ensure that any potential risks and/or risks not yet identified are fully identified.

本管理政策自发布之日起实施。

Effective Date:

This policy takes effect immediately upon issuance and applies to Fujian Jinyudeshang Refinery Technology Co., Ltd. and all its gold suppliers.

福建金玉德尚精炼科技有限公司

Fujian Jinyudeshang Refinery Technology Co., Ltd.

2023 年 12 月 21 日

December 21, 2023