# Due Diligence Management Regulations for Supply Chain

# Chapter I General Provisions

Article 1 To better participate in the transaction activity of London Bullion Market Association (hereinafter referred to as LBMA) in accordance with LBMA Responsible Gold (Silver) Guidance, standardize supply chain management level in combination with the actual situation of the Company, combat systematic or large-scale violations of human rights, avoid conflicts, and observe anti-money laundering and curb terrorist financing, these Regulations are developed.

Article 2 These Regulations apply to the suppliers and partners providing the Company with raw materials necessary for mineral and recycled gold and silver, including producers, middlemen, processors, exporters and transporters.

Chapter II Organizational Structure and Responsibilities

Article 3 In accordance with LBMA due diligence management requirements and practical needs of business development, the following management organizations has been set up: Compliance Committee, Compliance Director, Compliance Risk Officer and Compliance Officer.

Article 4 The Compliance Committee shall be made of the General Manager of the Company serving as the Director, the Deputy General Manager of the Company as the Deputy

Director and committee members including responsible person of relevant department and workshop. The Compliance Risk Officer shall concurrently be the head of the Audit and Risk Control Department. The Compliance Officer shall be assigned by the Marketing Department, the Marketing Department II, the Finance Department, the Quality Control Center and the Refining Workshop to be in charge of the due diligence related work of the supply chain.

# **Article 5** Staff responsibilities:

#### (I) Compliance Committee

The highest decision-making body for supply chain due diligence is fully responsible for the due diligence of supply chain, in charge of the approval of policies and regulations of supply chain due diligence and the Compliance Report and providing sufficient resources to support the operation and monitoring of processes and systems of supply chain due diligence.

# (II) Compliance Director

- 1. Preside over and be in charge of daily supply chain due diligence of the Company;
- 2. Be in charge of the review of supply chain due diligence policies and regulations and the Compliance Report;
- 3. Be in charge of the establishment of supply chain due diligence management system and management process and the

regular assessment of effectiveness of management system and process to promote theirs' continuous improvement;

- 4. Ensure that appropriate measures are executed in high-risk supply chains and transactions, and appropriate measures are taken to reduce and eliminate risks in identified high-risk gold and silver supply chains or transactions; Determine to take strict control and isolation measures when high-risk supply chains or transactions are identified, and report to the Compliance Committee actual and potential risks identified in both supply chains and risk management strategies adopted;
- 5. Coordinate the management communication and training matters of the supply chain due diligence for the Company and all departments.

# (III) Compliance Risk Officer

- 1. Be in charge of drafting and revising the Company's supply chain due diligence management policies and management methods;
- 2. Be in charge of the implementation of supply chain due diligence measures, zero-tolerance and high-risk supply chain evaluation standards, and guiding, coordinating and reporting company risk assessment, response and monitoring; Supervise and inspect the implementation of each department, and carry out the assessment;

- 3. Be in charge of supervising the process of supply chain due diligence and assessing whether the due diligence is adequately conducted; Be entitled to request suppliers and business departments to provide additional documents or information if deemed necessary;
- 4. Report to the Compliance Director any abnormal situation arising from supply chain due diligence process and transactions;
- 5. Be in charge of gathering and summarizing opinions and suggestions of all departments on supply chain due diligence work, or abnormal situation in investigation work, and report to Compliance Director;
- 6. Lead and organize all departments to complete supply chain due diligence evaluation and LBMA routine annual audit;
- 7. Carry out the supply chain due diligence management training on staff at the end of each year.
  - (IV) Marketing Department Compliance Officer
- 1. Carry out the pre-control, in-process supervision and post-evaluation work of the supply chain due diligence;
- 2. Strictly execute the supply chain due diligence measures and evaluation standards for zero-tolerance supply chain and high-risk supply chain;
  - 3. Be in charge of gathering and keeping sufficient supply

chain documentation, including but not limited to copies of ID cards of individual suppliers, business licenses of legal suppliers, mining licenses of mine suppliers and environmental, social and governance related materials;

- 4. Be in charge of establishing files of supply chain due diligence and carry out the site investigation on important supply chains regularly.
- 5. Be in charge of publicizing the Company's supply chain due diligence policies and regulations to suppliers, confirming in writing with suppliers' compliance with relevant provisions, assisting and encouraging suppliers to build supply chain due diligence management system;
- 6. Be in charge of gathering and summarizing opinions and suggestions of all departments on the supply chain due diligence work, or abnormal situation in investigation process, and report to the Compliance Risk Officer;
- 7. Complete other matters required by the supply chain due diligence work.
  - (V) Compliance Officer of Marketing Department II
- 1. Carry out the pre-control, in-process supervision and post-evaluation work of the supply chain due diligence;
- 2. Strictly execute the supply chain due diligence measures and evaluation standards for zero-tolerance supply chain and high-risk supply chain;

- 3. Be in charge of gathering and summarizing opinions and suggestions of all departments on supply chain due diligence work, or abnormal situation in investigation process, and report to Compliance Risk Officer;
- 4. Be in charge of establishing files of supply chain due diligence and carry out the field investigation on important supply chains regularly.
- 5. Be in charge of publicizing the Company's supply chain due diligence policies and regulations to suppliers, confirming in writing with suppliers' conforming to relevant provisions, assisting and encouraging suppliers to build supply chain due diligence management system;
- 6. Be in charge of gathering and summarizing opinions and suggestions of all departments on the supply chain due diligence work, or abnormal situation in investigation process, and report to the Compliance Risk Officer;
- 7. Complete other matters required by the supply chain due diligence work.

# (VI) Compliance Officer of Finance Department

- 1. Strictly execute the supply chain due diligence measures and evaluation standards for zero-tolerance supply chain and high-risk supply chain;
- 2. Be in charge of gathering and keeping sufficient supply chain documentation;

- 3. Completely keep all financial documents for supplier transactions;
- 4. Assess the financial data of suppliers and clarify the business relationship;
- 5. Be in charge of gathering, summarizing and reporting opinions and suggestions of staff of the Company on the supply chain due diligence work;
- 6. Be in charge of gathering and summarizing opinions and suggestions of all departments on supply chain due diligence work, or abnormal situation in investigation process, and report to the Compliance Risk Officer;
- 7. Complete other matters required by the supply chain due diligence work.

# (VII) Compliance Officer of Quality Control Center

- 1. Strictly execute the supply chain due diligence measures and evaluation standards for zero-tolerance supply chain and high-risk supply chain;
- 2. Be in charge of gathering and keeping sufficient supply chain documentation;
- 3. Verify and record test result for each batch of raw material received, analyze and assess whether these data conforms to supply chain due diligence; If not, carry out a detailed investigation and produce a written investigation report;
  - 4. Be in charge of gathering and summarizing opinions and

suggestions of all departments on supply chain due diligence work, or abnormal situation in investigation process, and report to the Compliance Risk Officer;

5. Complete other matters required by the supply chain due diligence work.

(VIII) Compliance Officer of Refining Workshop

- 1. Strictly execute the supply chain due diligence measures and evaluation standards for zero-tolerance supply chain and high-risk supply chain;
- 2. Be in charge of gathering and keeping sufficient supply chain documentation;
- 3. Suspend warehousing or return directly for the existing high-risk supply chains or transactions;
- 4. Be in charge of gathering and summarizing opinions and suggestions of all departments on supply chain due diligence work, or abnormal situation in investigation process, and report to the Compliance Risk Officer;
- 5. Complete other matters required by the supply chain due diligence work.

Chapter III Identification and Assessment of Supply Chain

Article 6 The supply chain due diligence is conducted in accordance with the method based on risk assessment, and the due diligence must be carried out before and during the establishment of a new business relationship with the supply

chain.

**Article 7** With respect to the supply chain due diligence, the following principles shall be observed:

- (I) Principle of comprehensiveness. The supply chain due diligence work shall include various business and matters related to gold and silver supply chain of the Company as far as possible.
- (II) Principle of materiality. Based on the principle of comprehensiveness, the supply chain due diligence work shall mainly focus on conflict zones, world heritage sites and nature reserves.
- (III) Principle of objectivity. The risk situation in supply chain shall be accurately and truly revealed by the results of supply chain due diligence.
- **Article 8** The supply chain due diligence shall be conducted from three dimensions: location (including source and route), supply chain and type of raw materials.
- (I) Location risk identification shall include but not be limited to:
- 1. Determine the source of gold and silver, and truly record the categories of source: mineral gold and silver, recycled gold and silver, mining by-products and official stocks;
  - 2. Determine the source or route of gold and silver, and

refer to the international sanctions list approved by the Chinese government, Section 1502 of the Dodd Frank Act, the EU CAHRA List, the Heidelberg Conflict Barometer, the Fragile States Index or similar index, the United Nations Human Rights Office of the High Commissioner or equivalent, reports of the Financial Action Task Force (FATF) (including relevant country/territory reports), reliable market intelligence of high-risk gold centers/transit centers and countries/territory with high money laundering risk;

- 3. Determine whether the source of the mineral's gold and silver is located in the world heritage site.
- (II) Supply chain risk identification shall include but not be limited to:

The KYC questionnaire in toolkit is used to conduct the risk identification of supply chain, including but not limited to:

- 1. Make use of reliable, independently sourced documents, data, or information, identify and verify the name, actual address, company registration and license information of supply chain customers;
- 2. Make use of reliable identification documents with photos, identify and verify the ultimate beneficiary and related party information;
  - 3. Confirm that the gold and silver trading parties and their

ultimate beneficiaries are not included in any government's list of wanted money launderers or known fraudsters or terrorists;

- 4. Understand the business and financial information, and predict the purpose of the business relationship.
- (III) Raw material type risk identification shall include but not be limited to:
- 1. The risk identification from large-scale mining shall include but not be limited to: information on import and export licenses, mining operations, production data and processing capacity, third-party inventory sources, anti-money laundering and terrorist financing, bribery and corruption, human rights, environment, health and safety, labor, community participation, ethical and business integrity policies and practices;
- 2. The risk identification from artisanal and small-scale mining: information on suppliers, mining licenses, mining operations, using, storage and recovery of mercury;
- 3. The risk identification from recycled gold and silver shall include but not limited to: information on suppliers, types and forms, types and locations of facilities, import and export licenses, anti-money laundering and terrorist financing, bribery and corruption, and responsible procurement policies and practices.

Article 9 Based on the risk condition, the supply chain shall be classified into zero-tolerance supply chain, high risk

supply chain, medium risk supply chain and low risk supply chain.

# Article 10 Evaluation criteria of risk-free supply chain:

- 1. The mineral gold and silver are from the world heritage sites or natural ecological reserves;
- 2. Sources of mineral gold and silver or recycled gold and silver violate international sanctions and are recognized by the Chinese Government;
- 3. The suppliers of mineral gold and silver or recycled gold and silver, other known upstream companies or owners of their proceeds are known money launderers, fraudsters or terrorists, or have seriously violates human rights, or directly or indirectly supported illegal non-state armed groups, or fraudulently misrepresented the origin of minerals.

The business relationships with supply chain shall not be established or the existing relationships must be terminated timely, once the zero-tolerance problems are found.

# Article 11 Evaluation criteria of high-risk supply chain:

(I) High-risk problems of mineral gold and silver shall include but not be limited to:

#### 1. Based on locations:

- (1) Come from the transit or transported through areas affected by conflict or at high risk of human rights violations;
  - (2) Come from the transit countries or areas of gold and

silver known to be conflict-affected and high-risk;

- (3) Declare to come from a country known to be with limited reserves, resources, or projected production;
  - 2. Based on supply chain (supply counterparty other known upstream company);
- (4) Have shareholders, ultimate beneficiaries or other gold and silver supply stakeholders based on one of the high risk criteria of location;
  - (5) Have ultimate beneficiaries with political risks;
- (6) Be engaged in high-risk commercial activities including arms, gaming and casino industries, antiques and art, religious activities and serving as theirs leader;
- (7) Purchased gold and silver from high-risk countries in the last 12 months
  - 3. Based on raw material type:
    - (8) Come from artisanal and small-scale mining
    - (9) Use the mercury for production;
- (10) Cause or are likely to cause catastrophic or highly adverse environmental, social and governance impacts that are irreversible, sensitive, diverse or unprecedented in the absence of appropriate mitigation measures.
- (II) High risk problems of recycled gold and silver shall include but not be limited to:
  - 1. Based on locations:

- (1) Come from the transit or transported through areas affected by conflict or at high risk of human rights violations;
- (2) Come from the transit countries or areas of gold and silver known to be conflict-affected and high-risk, or the countries that restrict the export of gold and silver with reasonable suspicion of transshipment or impropriety;
  - 2. Based on supply chain (supply counterparty or other known upstream company)
- (3) Carry out the business in countries at high risk of money laundering;
- (4) High risk standard shareholder based on location, or ultimate beneficiaries or other gold and silver supply interests;
  - (5) Have ultimate beneficiaries with political risks;
- (6) Be engaged in high-risk commercial activities including arms, gaming and casino industries, antiques and art, religious activities and serving as theirs leader;
- (7) Purchased gold and silver from high-risk countries in the last 12 months;
- (8) Exist the obvious unexplained geographical distances with suppliers or counterparties in the supply chain;
  - 3. Based on raw material type:
- (9) Intermediate refineries or dealers with high risk supply chain or counterparties purchasing from intermediate refineries

with high risk supply chain.

The supply chains classified as high-risk will trigger enhanced due diligence.

#### **Article 12** Evaluation criteria of medium-risk supply chain:

The suppliers having un-sufficient understanding of or cooperation with the Company's supply chain due diligence regulations shall be classified as the medium-risk supply chain during the supply chain due diligence process. The post-trainings on these suppliers shall be intensified, with the continuous monitoring of their business motives in the trading process.

# Article 13 Evaluation criteria of low-risk supply chain:

The supply chains not conforming to zero-tolerance supply chain, high-risk supply chain and medium-risk supply chain shall be classified as the low-risk supply chain.

Chapter IV Procedures of Supply Chain Due Diligence

- Article 14 With respect to all involved suppliers and relevant partners, appropriate due diligence procedures shall be established, and they shall be clearly informed during trading.
- (I) The information collection and evaluation of suppliers shall include but not be limited to:
- 1. Before signing cooperation agreements with suppliers, in accordance with the different raw material types, the Business Department shall conduct interviews with suppliers according to

the KYC questionnaire content in the toolkit respectively;

- 2. Verify basic information of suppliers with reliable, independently sourced documents, data or materials;
- 3. Identify customers, companies, and revenue owners, and verify theirs identification with reliable, independently sourced documents, data or materials;
- 4. Company environmental and social responsibility report: including ESG (applicable to Hong Kong Stock Exchange listed companies and overseas listed companies), CSR (applicable to A-share listed companies) or company safety and environmental assessment report (applicable to non-listed companies), etc.;
- 5. Obtain methods, transport routes and transport middlemen basic information of raw material transportation;
- 6. Obtain details of the commercial and financial aspects of the supplier, the purpose of the gold and silver transactions and the business operations of the supplier;
- 7. Carry out the labor protection related investigation on suppliers with labor and employment relations, including but not limited to interview, field investigation and anonymous questionnaire;
- 8. Regularly carry out the recheck and evaluation on the qualified suppliers, and organize the emergency assessment for emergencies.
  - 9. Need to timely organize the investigation on the

qualified suppliers with the changed information in accordance with the supply chain due diligence procedure, and keep the archive database up to date;

- 10. Assist suppliers to build risk control management system.
- (II) Additional investigations on suppliers with the sources from mineral gold and silver shall include but not be limited to:
  - 1. Must obtain the origin information of gold and silver;
  - 2. Obtain the mining license and business license;
- 3. Obtain the import and export license of gold and silver (if any import and export business);
  - 4. Gather and assess the information of mining situation;
  - 5. Obtain the data of mining capacity;
- 6. It is required to firstly assess whether the mineral gold and silver from artisanal or small-scale mines (ASM) are legal; The relevant qualification certificate of the counterpart shall be gathered in case they are legal; In case they are illegal, the transactions shall be suspended, with the rejection of procurement from the counterpart and acceptance the commissioned processing of the counterpart;
- 7. Gather related data on supplier compliance with environmental and sustainability requirements;
  - 8. Carry out the field visits for suppliers if necessary.
  - (III) Additional investigations on suppliers with the sources

from recycled gold and silver shall include but not be limited to:

- 1. Gather and assess the relevant information on anti-money laundering and combating terrorist financing of suppliers;
  - 2. Obtain the proof of origin of recycled gold and silver;
  - 3. Beneficiary information.

Article 15 For the supply chain triggering high risk, methods of due diligence shall be intensified, and the field investigation and visits of gold and silver producing areas must be conducted, with the field investigation content including but not limited to:

- 1. Carry out the field visits or interview for high-risk supply chains, and verify the authenticity of document records of supply chain due diligence results;
- 2. Verify the situation with reliable, independently sourced documents, data and information. Verify due diligence information of the links involved in the supply chain (including producers, middlemen, traders, exporters and shippers) from the mine to the Company;
- 3. Carry out the field visits or interview before any transaction takes place, or at least within 6 months of the commencement of the business relationship;
  - 4. Be carried out by the competent staff or independent

third party consultants not having any conflict of interest with suppliers, with the commitment of reporting truthfully and accurately;

- 5. Consult with relevant internal and external interest stakeholders where applicable;
- 6. Apply the field investigation report template in the investigation toolkit;
- 7. Conduct the tracking in accordance with the quantities and serious degree of problems identified and recorded in the improved plan.
- Article 16 In accordance with raw material types, the enhanced due diligence measures shall be carried out during the field investigation or remotely as appropriate, and the following procedures shall be included:
- (I) The enhanced due diligence measures for high-risk large-scale mining of gold and silver supply chains shall include but not be limited to:
- 1. KYC activity shall be conducted by the proportion in the high-risk location-based supply chain from mine to company (including gold and silver producers, intermediaries, gold and silver traders, exporters and shippers);
- 2. Understand the nature of public or private safety services provided in mines and through supply chains;
  - 3. Assess the risk of militarization of mines and transport

routes, and directly or indirectly support the illegal non-state armed groups and public or private security forces;

- 4. Review the human rights risk assessments and due diligence conducted by mines or representatives of mines to determine the risk of any serious human rights violations committed by one party in the mines, transportation routes, gold and silver trading and export links;
- 5. Estimate the number of artisanal and small-scale miners with producer concessions;
- 6. Assess the payments for taxes, fees and royalties to government agencies in terms of mineral exploration, trade and export by supply counterparties.
- 7. Assess payments or compensation from the supply chain beginning with mining to government agencies and officials, public or private security forces or other armed groups, unless prohibited by law;
- 8. Assess the compliance with assessing environmental, health, safety, labor, community, business integrity regulations, policies and good practices determined in the preliminary due diligence.
- (II) The enhanced due diligence measures for high-risk small-scale mining of gold and silver supply chains shall include but not be limited to:

- 1. KYC activity shall be conducted by the proportion in the high-risk location-based supply chain from mine to company (including gold and silver producers, intermediaries, gold and silver traders, exporters and shippers);
- 2. Gather information on governmental, political or military connections of suppliers of artisanal small-scale mining, and directly or indirectly support the illegal non-state armed groups and public or private security forces;
- 3. Gather the proof of any serious human rights violations committed by any party in the mines, transportation routes, gold and silver trading and export links;
- 4. Assess the risk of militarization of mines and transport routes, and directly or indirectly support the illegal non-state armed groups and public or private security forces.
- 5. Assess the conflict or tension between large-scale mining and artisanal small-scale mining.
- 6. Assess the risk, suspicion or report of fraudulent representations that gold and silver from other sources are unknowingly introduced;
- 7. Assess the storage, disposal and use of mercury, and its impact on environment and staff health;
- 8. Assess the suitability of other environmental, social, and governance risk management practices related to the issues identified during the initial due diligence.

- (III) The enhanced due diligence measures for high-risk recycled gold and silver from intermediate refiners shall include but not be limited to:
- 1. Obtain independent certification reports on the responsible procurement practices of intermediate refiners;
  - 2. Confirm the final beneficiaries of suppliers;
- 3. Entrust any additional site investigation activities to an independent third party.
- (IV) The enhanced due diligence measures for high-risk recycled gold and silver from other sources shall include but not be limited to:
- 1. Check government concern lists for every gold and silver company located in high-risk areas, and be engaged in the supply chain from counterparties to refiners (including shippers);
- 2. Interview selected management and site personnel to determine and verify supply chain due diligence practices, procurement, anti-money laundering and anti-terrorist financing procedures.
- 3. Assess whether the capacity of supply chain due diligence is proportional to the risk;
- 4. Assess the appropriateness of the risk classification methods of counterparties;

- 5. Assess a random sample of due diligence records to confirm that the procedure is conducted in accordance with the supply chain due diligence policies of counterparties;
- 6. Assess the site investigation reports of high-risk supply chain of counterparties based on samples.

# Chapter V Risk Management Strategy

Article 17 In accordance with the due diligence results of suppliers, the different risk management strategies shall be adopted, including relationships of termination, suspension and maintenance. As a dynamic evaluation process, the supply chain due diligence shall be continuously monitored with risk, with the maintenance of a supplier risk assessment at least each year. It is required to judge in accordance with the information collected in real time, and make a decision to terminate or suspend relationships, or to maintain the relationship with the improvement plan for the following situations that have been identified.

# (I) Terminate relationships

The cooperation with suppliers shall be timely terminated, in case evidence of suppliers' involvements in money laundering, financing of terrorism, gross human rights violations, direct or indirect support for non-state armed groups and misrepresentation of the source of the mineral are found in the enhanced due diligence. For the suppliers whose cooperation are

terminated, the Company shall report such cases to the relevant authorities and the LBMA in accordance with applicable domestic and foreign legal requirements.

# (II) Suspend relationships

The Company shall postpone purchasing raw materials from suppliers until more information and evidence is available, in case the supplier's involvements in money laundering, terrorist financing, gross human rights violations, direct or indirect support for non-state armed groups, misrepresentation of mineral sources and catastrophic ESG impacts are suspected reasonably by the enhanced due diligence. After the approval by the Compliance Director, the purchase from suppliers can be recovered, once suppliers provide additional information/data refuting initial suspicions, or timely and appropriately respond to address ESG impacts.

(III) Maintain relationships but implement improvement plans

The Company can carry out normal cooperation with the supplier after the review of the Compliance Risk Officer and the approval of the Compliance Director under the capacity to provide risk solutions including clear improvement plans and timelines, in case potential problems or a small number of existing problems are not found. including bribery, misrepresentation of non-fraudulent mineral sources,

non-payment of taxes and royalties payable to the government, serious violations of local legislation relating to the environment, health, safety, labor and community or ESG risks with a high likelihood of adverse impacts. The clear performance objectives, performance evaluation metrics based on quantitative and qualitative analysis, and reasonable completion dates shall be included in the risk solution.

Article 18 It is required to monitor the improvement plan with the principle of integrity to adopt measures of measurable steps, performance monitoring and periodical risk reassessment for supply chain and report regularly to the Compliance Director.

Article 19 With respect to risk monitoring, the significant and measurable improvements measures to eliminate risk are determined within six months of starting the improvement plan. The additional measures are provided for in the revised improvement plan in accordance with the progress achieved in the six months. The assessment of performance shall be formal to determine that measures have been properly implemented by the deadline (such as through independent audits, follow-up site visits, or remote reviews).

Article 20 The cooperation relationship shall be suspended until the improvement plan is responded by the supply chain, when the improvement is limited or no measurable improvement

can be proved after the 6 month period in which the improved relationship is established. The relationships shall be terminated after failed attempts to reduce risk and improve performance.

Article 21 The final control and decision-making rights of supply chain due diligence shall be retained by the Compliance Committee, and the actual and potential risks determined in supply chain and the risk management strategies adopted shall be reported by the Compliance Director to the Compliance Committee.

Chapter VI Transaction Process Supervision of Supply Chain

Article 22 With the establishment of gold and silver traceability system, the Company always keep the review and supervision for the process related to the transaction to guarantee the understanding of supply chain consistent with the risk prediction at the transaction. The supervision of transaction is conducted based on methods of risk. Therefore, the Company shall obtain and record the following information for each batch of raw materials received:

- 1. With respect to mineral gold and silver: estimated weights and laboratory results (from the supplier); Shipping/freight documents (freight/air waybill, performer invoice); Import and export forms for high-risk transactions (if possible);
  - 2. With respect to recycled gold and silver: estimated

weights (from the supplier); Shipping/freight documents (freight/air waybill, performer invoice); Import and export forms for high-risk transactions (if possible);

The company will verify whether these documents corroborate each other and are consistent with its understanding of the supply chain. It is required to conduct an investigation and produce a written investigation result, in case there is a situation of inconsistent transaction background.

Chapter VII Review and Compliance Evaluation of Supply
Chain Due Diligence

Article 23 The review of supply chain risk management system shall be organized by the Company, with the evaluation of suitability and effectiveness. In accordance with the review result, the *Compliance Report* shall be prepared by the Compliance Risk Officer and be reported to the Compliance Committee for the approval after the review of the Compliance Director. The management system of supply chain due diligence shall be audited by the independent third party arranged by the Company each year.

# **Chapter VIII Training**

Article 24 Every staff involved in the supply chain will be trained by the Company each year, with the training plan included in the Company's annual training plan.

Chapter IX Record Retention

Article 25 The Company shall keep adequate documentation of supply chain, and judge the requirements of risk in accordance with the standards of supply chain due diligence system, thus demonstrating the adequate and continuous completion of due diligence. Records are kept for at least 5 fiscal years.

Chapter X Information Communication Mechanism

Article 26 For the irregularities or anomalies found in the supply chain management and transaction, every staff shall timely report by emails and phones to the Compliance Officer of affiliated department and workshop. The irregularities or anomalies shall be undertaken and disposed by the Compliance Risk Control Officer, with the response to staff in a way of direct interview within 3 workdays. The privacy of staff shall be protected in the whole appeal process, and the information of informers shall be confidential, without any act of retaliation.

Report phone for violation situations of Shandong Gold Smelting Co., Ltd.:

0535-2697916

0535-2697917

Email address for violation situations of Shandong Gold Smelting Co., Ltd.:

157620089@qq.com

Chapter XI Supplementary Provisions

Article 27 These Management Regulations shall be

implemented as of the date of issuance.

Article 28 These Management Regulations shall be interpreted by the Audit and Risk Control Department.