Company Name:	Zijin Mining Group Gold Smelting Co., Ltd. Shenzhen Branch
Address:	No. 4 Jinyuan 3rd Road, He'ao Community, Yuanshan Street, Longgang District, Shenzhen
Reporting year-end:	2024
Date of Report	March 28, 2025
Senior management responsible for this report	Wu Weihuang, general manager

Refinery Evaluation

The following table lists the minimum requirements that the refining workshop must meet in accordance with the LBMA Responsible Gold Guidelines (9th edition) to demonstrate its compliance. The refining workshop should fill out the form and provide a response in the blank space provided. All unshaded spaces should be filled in.

Table 1: Company Profile		
Company Name:	Zijin Mining Group Gold Smelting Co., Ltd. Shenzhen Branch	
Address:	No. 4 Jinyuan 3rd Road, He'ao Community, Yuanshan Street, Longgang District, Shenzhen	
Reporting year-end:	2024	
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Zijin Mining Group Gold Smelting Co., Ltd. Shenzhen Branch was established in April 2016, located at No. 4 Jinyuan 3rd Road, He'ao Community, Yuanshan Street, Longgang District, Shenzhen. It is a wholly-owned subsidiary of Zijin Mining Group Gold Smelting Co., Ltd. with an annual smelting production capacity of over 100 tons of gold.

The company has advanced gold refining equipment and technology in China. It is one of the first batch of "green metallurgy" enterprises in Shenzhen. Through the chlorination gold reduction process and MVR wastewater treatment system, it basically realizes zero emission of waste gas and waste water. It was rated as "the exemplary organization of environmental protection and compliance remediation of enterprises in Longgang District in 2022". The company attaches great importance to safety and environmental protection work and has passed the Level 3 safety standardization certification twice in 2019 and 2022. It mainly engages in precious metal smelting, sales of gold and silver products, manufacturing of

non-ferrous metal alloys, non-ferrous metal rolling processing, and import and export of gold and its products. The main products are standard gold ingots with specifications of 1Kg and 12.5Kg.

Table 2: SUMMARY OF ACTIVITIES UNDERTAKEN DURING THE PERIOD TO DEMONSTRATE LBMA RGG COMPLIANCE

Step 1: Establish a company management system

• We have fully complied with the requirement of Step 1: Establish strong company management systems.

1.1 Does the refinery adopt a supply chain policy for gold supply chain due diligence?

In January 2024, we have finally released Gold Supply Chain Due Diligence Policy, which incorporates the risk and risk management measures outlined in Annex 2 of the OECD Due Diligence Guidelines ("OECD Annex 2") and RGG and extends to addressing adverse ESG factors in the company's native gold supply chain. The senior management has conducted a comprehensive review of the Gold Supply Chain Due Diligence Policy. The updated policy has been officially published on the Zijin Mining Group Gold Smelting Co., LTD's website and is accessible in English at http://hjyl.zjky.cn/lbma/.

The Company reviews the Due Diligence Management Policy annually and submits it to the Board of Directors as and when circumstances require.

Relevant business departments:

We have established a due diligence team for the gold supply chain, with the company's general manager serving as the compliance director and team leader. The team members are composed of the heads of the general office, the supervision, audit department, and relevant personnel.

Company policy:

Zijin Mining Group Gold Smelting Co., Ltd. Shenzhen Branch is fully aware of the potential adverse effects of mining, processing, and importing/exporting metal products from conflict and high-risk areas. We also recognize our responsibility to respect human rights and not support conflicts. Zijin Mining Group Gold Smelting Co., Ltd. Shenzhen Branch adopts the risk and risk management measures included in Annex 2 of the OECD Due Diligence Guidelines ("OECD Annex 2") and extends them to the gold supply chain policy to address adverse ESG factors in the company's primary gold supply chain. It strictly complies with environmental, health, safety, and labour regulations and/or company policies in the country/region where it operates, actively participates in due diligence work in the gold supply chain and ensures that the source of gold is legal. Therefore, we make the following commitments:

- 1. Adopting a zero-tolerance policy towards large-scale human rights abuses caused by the mining, transportation, or trading of metals:
 - 1.1 Any form of torture, or inhumane or degrading treatment.
- 1.2 Any form of forced labour, that is, forcing anyone to work or provide services in a threatening manner, rather than voluntarily doing so.
 - 1.3 Worst forms of child labour.
 - 1.4 Sexual violence or other serious violations of human rights.
 - 1.5 War crimes, or other serious violations of international humanitarian law, crimes against

humanity, and genocide.

If we determine that an upstream supplier has violated any of the above provisions, we will immediately ban transactions and negotiations with this supplier.

- 2. Zero tolerance policy towards direct or indirect support of illegal non-state armed groups or public or private security forces:
- 2.1 Illegally controlling mines, sites, traders or other intermediaries, as well as transportation routes in the supply chain.
 - 2.2 Illegally taxing or extorting money or minerals in the supply chain.
- 3. Do not propose, promise, give or demand bribes or kickbacks in any way to individuals, including government officials, customers, suppliers or any other organizations, and do not falsely report the origin of gold.
- 4. Comply with regulations regarding taxes, fees, and usage fees payable to the government for mineral extraction, trade, and export originating from conflict affected and high-risk areas ("CAHRA").
- 5. Adopt a zero-tolerance policy towards money laundering or terrorist financing, as well as actions that fuel conflicts.
- 6. For adverse ESG factors that do not comply with the environmental, health, safety, and labour regulations of the country/region where the business operates and/or the following policies of the company, a zero-tolerance policy will be adopted:
- 6.1 Environmental management, including: 1) failure to comply with air, water, land pollution and incident management plans and water management policies (especially in water scarce areas); 2) Unauthorized procurement from World Heritage sites and protected areas;
- 6.2 The storage, handling, and disposal of hazardous chemicals (including mercury and cyanide) did not comply with the International Cyanide Management Code.
- 6.3 Failure to comply with labour management policies, including salary, working hours, collective bargaining, discrimination, diversity, disputes, and worker rights protection
- 6.4 Failure to comply with community participation and management plans (land acquisition and community resettlement, cultural heritage sites and indigenous peoples, closure planning, and protection of vulnerable groups).
- 6.5 Failure to comply with the management of business integrity and ethical behavior, and failure to support the implementation of relevant initiatives such as the Extractive Industries Transparency Initiative (EITI).
- If we determine that an upstream supplier has violated any of the above provisions, we will immediately ban transactions and negotiations with this supplier.
- 7. We require our employees, suppliers, and business partners to comply with the above policies and take necessary measures to ensure their implementation.

Zijin Mining Group Gold Smelting Co., Ltd. Shenzhen Branch is willing to accept supervision from customers and relevant organizations and welcomes suppliers and stakeholders to provide suggestions on the above policies.

1.2 Does the refinery establish an internal management structure to support supply chain due diligence?

We released standardized work documents such as the Gold Supply Chain Due Diligence Procedure. The document elabourates on our internal management structure to support supply chain due diligence.

Internal management structure:

The company has established a "Responsible Gold Supply Chain Due Diligence Team" to clarify responsibilities and authorities, communication, training, internal review, and senior management review. The relevant departments and personnel all have rich experience in supply chain management. They regularly receive supply chain compliance training organized by the company and are led by the board of directors.

The team member (general manager) has more than five years of senior management experience, responsible for providing the necessary manpower and resources, cooperating with the operation and monitoring of due diligence processes, approving high-risk supply chains, ensuring the effective operation and continuous improvement of supply chain due diligence policies and processes, appointing compliance directors and compliance officer, supervising, timely correcting, and organizing rectification within a specified time limit for behaviors that fail to achieve risk control.

- 1. The Compliance Director has over five years of supply chain management experience and is responsible for conducting due diligence and compliance reports on the gold supply chain.
- 2. Compliance officer have more than five years of supply chain management experience, and their responsibilities should include but are not limited to:
- 2.1 Review the due diligence process and system of the gold supply chain to meet the objectives of RGG (Responsible Gold Guidelines) and the risk management needs of refiners.
- 2.2 Ensure that key information, including company policies, has an effective structure and communication process that can be conveyed to relevant employees and gold suppliers.
- 2.3 Ensure sufficient resources (including capabilities and experience) to support the operation and monitoring of the supply chain due diligence process and system.
- 2.4 Train employees on supply chain risks (including threat financing and ESG) and develop and update gold supply chain policies and procedures for refiners.
- 2.5 Review and understand customer (KYC) documents and risk classifications and request additional documents or information if necessary.
 - 2.6 Ensure appropriate measures are taken for high-risk supply chains or transactions.
 - 2.7 Provide appropriate and timely information for the board of directors to fulfill its duties.
- 2.8 Coordinate and organize due diligence on the gold supply chain and review the supply chain due diligence compliance investigation report.
- 2.9 Responsible for all matters related to the gold supply chain: organizing and conducting due diligence work; Develop and implement corresponding risk management measures for various assessed risks; Develop training programs for all employees involved in the gold supply chain work; Write and update gold supply chain management policies; Report the risk assessment results to the management.
- 2.10 The Supervision and Audit Department of the Gold Smelting Company is responsible for facilitating complaint and reporting channels, investigating and handling fraudulent activities involved in the supply chain of the Shenzhen branch.
- 2.11 General office business and human resource leader: responsible for investigating and evaluating suppliers, submitting risk assessment forms; Responsible for compiling and maintaining transaction

records. Coordinate with the marketing department of the gold smelting company to assist in communication and document translation between the company and LBMA. Responsible for communication and exchange work, promoting various policies and uploading and distributing information.

2.12 Financial Director of the General office: Assist compliance officer in conducting due diligence and verifying supplier business and financial information; Provide relevant financial data.

Training:

In 2024, members of the due diligence team organized by the compliance officer conducted two training sessions on the 9th edition of the LBMA Responsible Gold Guide, the Disclosure Guidance, and the company's supply chain due diligence management policies and procedures. Sign-in and evaluation of training outcomes were conducted for all the training sessions. Training records were kept, and the number of participants was 12.

Transaction payment:

All business transactions are conducted through official bank channels for the payment and receipt of gold prices, and there are no cash transactions at all.

Maintaining records:

According to the Gold Supply Chain Due Diligence Procedure, all suppliers related documents, including due diligence documents, risk assessment forms, compliance documents, contract texts, inspection records, and inbound and outbound records, shall be kept for at least five years.

1.3 Has the refinery established a gold supply chain traceability system, including a chain of custody map and identification of supply chain participants?

The Company identifies all counterparties and determines the sources of precious metal materials through the information collected in due diligence process and contracts, customs declarations, waybills, and other transaction documents.

For gold mining suppliers, the company must obtain the following information:

Reasonable evidence to prove the source of the extracted gold; Mining license (if applicable); Import and export licenses for mining gold (if applicable); Supporting documents on the actual mining situation of the mine; Mine production capacity data (if any).

If corresponding evidence cannot be obtained, financial information, human resources, occupational health, environmental aspects, and community related party information should also be obtained to demonstrate the safety, transparency, and traceability of the transaction.

For recycled gold suppliers, the company must keep the following information: warehouse receipts, testing reports.

For official inventory, the company must keep the following information: customs declaration form, invoice, packing list.

Supply chain traceability:

We strictly implement the Gold Supply Chain Due Diligence Procedure, conduct risk-based due diligence on suppliers, monitor all transaction behaviors, and the Market Department is responsible for promoting the company's "Supply Chain Due Diligence Policy" during business negotiations, collecting and organizing supply chain due diligence materials, issuing Know Your Customer (KYC) documents,

collecting supplier information, verifying the authenticity of information through third-party channels, and filling out supplier risk assessment forms. The results of due diligence are reviewed by compliance officer.

For each storage of gold raw materials, corresponding documents such as storage receipts (including weighing records), official invoices, packing lists, etc. are kept by the market department for a period of 5 years. Thus, risk management of the gold supply chain is carried out during the transaction process, aiming to ensure the traceability of the gold supply chain.

1.4 Has the refinery strengthened company engagement with gold-supplying counterparties, and assisted the gold supply counterparty to improve due diligence capability when possible?

We have developed the Gold Supply Chain Due Diligence Policy. During the contract signing period, we communicated with the supplier and requested that they commit to complying with our Gold Supply Chain Due Diligence Policy in the contract and inform the supplier of the purpose and requirements of the gold supply chain due diligence system. We invite suppliers to fill out Know Your Customer (KYC) documents and Letter of Commitment for Supplier Responsible Gold to support our due diligence work. If any supplier wishes to improve their supply chain practices, we are also willing to assist or share our experience. There were no special due diligence issues involving suppliers during the reporting period. We support the implementation of the transparency action plan principles for the mining industry, and did not purchase gold from companies in EITI countries in our business.

1.5 Has the refinery established a company-wide confidential grievance mechanism?

Following the "Reporting Management Measures of Zijin Mining Group Gold Smelting Co., Ltd.", the disciplinary inspection, supervision, and audit departments of the group and the company are specialized departments responsible for receiving, processing, and providing protection to whistleblowers, independent of business departments. Everyone can report, and the reporter has the right to report anonymously. There is a dedicated reporting hotline (0597-3996322) and reporting email for reporting channels (hjylyxgsjcsj@126.com), network platform (hjyl. zjky. cn), mobile platform (WeChat official account), and comment mailbox. All reports will be investigated by a dedicated person and completed within one month; For more complex or important matters to the company, the investigation and handling should be completed as soon as possible within 3 months. If the investigation period needs to be extended due to special circumstances, it should be explained to the main person in charge of the company, and an extension of 1-2 months should be applied for depending on the situation. After the investigation is completed, the Supervision and Audit Department should form an investigation report and handling suggestions, and submit them to the company's main leaders or group superiors for review. If the investigation finds that the reported matter does not require accountability punishment, the case will be closed; For those who need to be held accountable, the investigation report and handling suggestions must be submitted to the authorized institutions of the company for review in accordance with the company's internal rules of procedure. After handling the report, the case will be closed. If the report is not true, it can be clarified within a certain scope if necessary to eliminate the impact. For real name reporting, after the investigation and handling are completed, the company will provide feedback to the reporter within 5 working days; For anonymous reports, the company protects the reporter's identity according to internal procedures, and the feedback will be determined based on the actual situation. If the investigation is true, it will be reported within a certain range. If the investigation is not true, it will not be dealt with.

When communicating with internal employees, we use information sharing channels such as bulletin boards and government disclosure boards to ensure that employees understand the intent of due diligence policies and the status of LBMA's gold due diligence work; Implement the petition policy, establish

Suggestion boxes to solicit employee opinions, and facilitate employee supervision and evaluation. No grievance regarding the gold supply chain were received during the reporting period.

Step 2: Risk identification and assessment

• We have fully complied with requirement of Step 2: Identify and assess risks in the supply chain.

2.1 Does the refinery have a due diligence process to identify risks in the supply chain?

The company has defined location risk, supplier risk, risk identification standards related to mining gold from large or medium-sized mines (LSM), risk identification standards related to mining gold from small-scale mines (ASM), and risk identification standards related to mining gold from recycled gold sources in the Gold Supply Chain Due Diligence Procedure, in accordance with the second step of the LBMA Responsible Gold Guidelines, as well as the requirements of Annex 2 of the OECD Due Diligence Guidelines, and taking into account adverse ESG factors in the gold supply chain of refiners.

We have released the Due Diligence Measures for the Gold Supply Chain, which details the due diligence process for identifying risks. The data sources for the comprehensive assessment of all risks in the supply chain include but are not limited to: sanctions lists (the United States, the United Kingdom, the European Union, the United Nations and related sanctions lists), Article 1502 of the Dodd Frank Act, the EU CAHRA list, the Heidelberg Barometer, the Vulnerable Countries Index or similar indicators, reports of the Office of the United Nations High Commissioner for Human Rights or equivalent institutions, the Financial Action Task Force (FATF) (including reports of relevant countries/regions), reliable market intelligence on high-risk gold centers/transit centers and countries/regions with high money laundering risks, and other information.

Supply chain due diligence:

We use the KYC survey questionnaire method (this survey questionnaire is from the template published on the LBMA official website). The company obtains information on whether suppliers have violated the Gold Supply Chain Due Diligence Policy through various channels such as business meetings and business information inquiries. In risk identification, we evaluate the location and supply chain of the purchased gold containing materials, as well as the type of gold containing materials purchased, and conduct corresponding risk identification. We verify whether the location of the mine where the gold is mined is on the sanction list, monitor the transportation route of the purchased gold, then verify the legitimacy of the supplier, determine their actual address, company registration, license information, investigate the reputation of the legal person or authorized signatory to ensure that they are not involved in human rights violations, money laundering, fraud, and terrorist activities, and obtain information and data about the supplier's business and financial status to understand their business operation mode. The compliance officer will ultimately report the risk assessment results and the implementation of risk management measures to the compliance director. After the compliance director reviews, the assessment results will be communicated to the supplier.

Monitoring of transactions:

We conduct continuous review and supervision of the process of transaction association to ensure consistency in understanding and risk prediction of the supply chain during the transaction. The regulation of transactions is carried out using a risk-based approach. Therefore, we obtain and record the

following information for each batch of raw materials received: weight, inspection report, invoice, customs declaration (if any), etc.

We monitor the actual transportation route of each batch of goods and verify whether the above documents confirm each other, confirm whether the document information is consistent with KYC information, and whether it is consistent with our understanding of the supply chain. If there is any discrepancy or suspicion in the transaction background, the relevant gold will be immediately isolated and stored (until the inconsistency is resolved), and an investigation will be conducted and recorded. And report the investigation results to the Compliance Director, and if necessary, to the Board of Directors.

As of December 31, 2024, the company has completed the risk identification work for all its suppliers during the reporting period and has been continuously monitoring the transaction process.

2.2 How does the refinery classify the identified risks according to the standards of its due diligence system?

We strictly conduct risk assessments every year in accordance with the due diligence requirements of the gold supply chain, and currently our suppliers are all low-risk. The company has defined standards for zero tolerance supply chains, high-risk supply chains, medium risk supply chains, and low-risk supply chains in the "Supply Chain Due Diligence Management Procedure" based on the relevant provisions of the 9th edition of the Responsible Gold Guidelines and Annex 2 of the OECD Due Diligence Guidelines, and considering adverse ESG factors in the gold supply chain of refiners. The risk assessment results are divided into three categories: high-risk, medium risk, and low-risk.

We refuse to cooperate with suppliers who exhibit zero-tolerance indicators of misconduct, the evaluation criteria for zero-tolerance supply chains:

- 1. The Mined Gold is known to originate from areas designated as World Heritage Sites.
- 2. The Mined or Recycled Gold is known to be sourced in breach of international sanctions (including but not limited to those of the UN, EU, UK and US).
- 3.The Mined or Recycled Gold supplying counterparty, other known upstream companies or their UBOs are known money launderers, fraudsters or terrorists, or have been implicit in serious human rights abuses, or in direct or indirect support to illegitimate non-state armed groups.

The evaluation criteria for high-risk supply chains:

Mined Gold:

- 1.Originates from, has transited or has been transported via a Conflict-Affected and High-Risk Area (CAHRA).
- 2.Is claimed to originate from a country through which gold from CAHRAs is known, or reasonably suspected, to transit.
- 3.Is claimed to have originated from a country that has limited known reserves, likely resources or expected production levels.
- 4.Have shareholders, or UBOs, or other gold supplying interests in one of the location-based high-risk criteria.
 - 5. Have UBOs that are Politically Exposed Persons (PEPs).
- 6.Have activities in a higher-risk business activity such as arms, gaming and casino industry, antiques and art, and sects and their leaders.

- 7. Have been known to have sourced gold from a high-risk country in the last 12 months.
- 8. Have material discrepancies/inconsistencies in the documentation provided or have refused to provide requested documentation.
 - 9. Sourced from ASM.
 - 10. Produced with the use of mercury.
- 11.Contributing to catastrophic harm or highly adverse ESG factors, to the extent that the Refiner is able to identify this (e.g., through a record in the public domain or in the Refiner's due diligence file).

Recycled Gold:

- 1.Originates from, has transited or has been transported via a Conflict-Affected and High-Risk Area (CAHRA).
- 2.Is claimed to originate from a country through which gold from CAHRAs is known, or reasonably suspected, to transit.
- 3. The gold-supplying counterparty or other known upstream companies operate in a money laundering high-risk country.
- 4. The gold-supplying counterparty or other known upstream companies have shareholders, or UBOs, or other gold-supplying interests in one of the location-based high risk criteria.
- 5.The gold-supplying counterparty or other known upstream companies have UBOs who are Politically Exposed Persons (PEPs).
- 6.The gold-supplying counterparty or other known upstream companies have activities in a higher-risk business activity such as arms, gaming and casino industry, antiques and art, and sects and their leaders.
- 7. The gold-supplying counterparty or other known upstream companies have been known to have sourced gold from a high-risk country in the last 12 months.
- 8. The gold-supplying counterparty or other known upstream companies have significant unexplained geographic routing from their supplier or counterparty in the supply chain.
- 9.From an Intermediate Refinery or trader with a high-risk supply chain or a trading counterparty sourcing from an Intermediate Refinery with a high-risk supply chain.

In the event of any of the above-mentioned high-risk situations, we will define the supplier as a high-risk one and implement the corresponding risk management strategies.

No high or medium risk suppliers were found in 2024.

2.3 Has the refinery undertake Enhanced Due Diligence (EDD) measures for the identified high-risk supply chains?

The company promptly implements EDD for high risk supply chain. Business engagement and transactions are not allowed if EDD remains unclosed. On-site Visit Reports for Mined material and Recycled material are adopted. As part of EDD, the site visit will be performed by capable refinery staff. Third party supplier will be engaged when necessary. As required by the policy, on-site visit should take place before the transaction with suppliers or at least within six months after the transaction.

When performing EDD on gold that comes indirectly from high-risk intermediate refiners, the Company will conduct a corresponding due diligence review, checking for the presence or potential of red flags in

the intermediate refiner's supply chain, and implement the appropriate risk management strategy.

In 2024, the Market Department conducted due diligence in accordance with the Gold Supply Chain Due Diligence Procedure, filled out a risk assessment form, and the compliance officer was responsible for reviewing the authenticity, effectiveness, and completeness of the due diligence and reporting to senior management. No zero tolerance, high, or medium risk supply chains were found, so EDD was not triggered.

Step 3: Risk management

• We have fully complied with step 3: Design and implement strategy to respond to identified risks.

Does the refinery design a risk management strategy for the identified risks in two ways: (i) to mitigate the risks when continuing the transaction, (ii) to mitigate the risks when suspending the transaction, or (iii) to disengage from the risks?

We have followed the requirements of step 3 of the LBMA Responsible Gold Guidelines and designed and implemented corresponding management for the identified risks. In 2024, all of our suppliers will be classified as low-risk. We refuse to cooperate with suppliers who exhibit zero-tolerance indicators of misconduct.

Risk management strategy:

We establish a risk assessment mechanism for gold suppliers to identify and evaluate supply chain risks, and design and implement corresponding management for identified risks. Before signing or renewing a contract, we conduct due diligence on the supplier and fill out the 'Supplier Risk Assessment Form' based on the collected information.

We adopt different risk management strategies based on the results of risk assessment. According to the relevant policies, for identified high-risk suppliers, our company will suspend cooperation. In accordance with the requirements of the responsibility guidelines, we will take strengthened due diligence measures to conduct on-site investigations/visits to the gold production areas (including but not limited to mining areas for gold and the office locations of gold suppliers for recycled gold). If the risk situation is true, we will take measures such as terminating cooperation. If the due diligence results are not completely satisfactory but can be improved by improvement plans, we will suspend cooperation and adopt an improvement strategy to provide suppliers with good faith and reasonable advice, so that they can meet our requirements for supply chain risk assessment within a reasonable time. The business department is responsible for supervising the implementation of risk resolution and regularly repeating evaluations within 180 days. If the due diligence results indicate that there are limited or no measurable improvements, we will consider suspending our relationship with the supplier until the supplier responds to the improvement plan; If attempts to mitigate risks and improve performance fail, we may consider terminating our relationship with the supplier until there is evidence that the supplier meets our requirements for supply chain risk assessment. All risk assessment processes and assessment forms are reviewed by compliance officer and reported to senior management.

Based on the results of the due diligence in 2024 and the risk assessment form, the compliance officer reviewed all due diligence materials and reported to senior management. All suppliers are classified as low-risk in 2024.

Step 4: Independent third-party assurance

• We have fully complied with Step 4: Carry out independent third-party audit of Refiner's due diligence practices.

We issue a tender to the certification body every year, considering qualifications, prices, and service capabilities. Finally, we have engaged Deloitte Touche Tohmatsu Certified Public Accountants LLP to carry out an independent reasonable third-party assurance on our compliance practices adhered to the LBMA RGG. The Compliance Report and the assurance report will be published on the official website of ZiJin Mining Group Gold Smelting Co., LTD.

Step 5: Supply chain due diligence report

• We have complied with Step 5: Report on supply chain due diligence.

We have compiled and released the 2024 Gold Supply Chain Due Diligence Compliance Report, which reports on our compliance with the LBMA RGG as of December 31, 2024.

Table 3: SUMMARY OF ACTIVITIES UNDERTAKEN DURING THE PERIOD TO DEMONSTRATE FORCED LABOUR COMPLIANCE

Has the refinery developed and implemented policies and procedures to ensure that forced labour production is not used in the supply chain?

We have developed the Gold Supply Chain Due Diligence Procedure aimed at combating systematic or large-scale human rights violations, avoiding conflicts, and complying with anti money laundering and counter-terrorism financing regulations. Suppliers are strictly prohibited from participating in activities that violate the LBMA liability guidelines. In 2024, the company conducted risk identification for all cooperative suppliers and did not find any high-risk suppliers.

When the General office signs business contracts with suppliers, the terms of the contract are clear: the quality gold provided by the supplier must comply with the LBMA Gold Supply Chain Statement, avoid activities involving conflict metals, abuse of human rights, funding of non-governmental armed groups, illegal criminal organizations, etc., and comply with the requirements of Annex 2 of the OECD's "Due Diligence Guidelines for Mineral Responsibility Supply Chain in Conflict and High Risk Areas".

In addition, we have developed the Gold Supply Chain Due Diligence Policy, which incorporates the risk and risk management measures outlined in Annex 2 of the OECD Due Diligence Guidelines (OECD Annex 2) and extends to addressing adverse ESG factors in the company's primary gold supply chain. The company promotes this policy to suppliers through websites, business negotiations and training.

The company has established General office responsible for human resource management and compliance with forced labour regulations, and has established a complete and applicable human resource management system for the entire company, covering employee recruitment, compensation and benefits.

According to the "Reporting Management Measures for Zijin Mining Group Gold Smelting Co., Ltd.", and everyone can anonymously report. In 2024, the company did not receive any reports related to forced labour.

Overall conclusion

Table 4: Management conclusion

Does the refinery meet the requirements of the LBMA Responsible Gold Guide and Forced Labour during the reporting period?

YES

As of December 31, 2024, we complied with the requirements of the LBMA RGG and LBMA Forced Labour compliance requirements. In the future, we will continue to implement the requirements of the "LBMA Guidelines for Responsible Gold of the London Bullion Market Association" and continuously improve the management of the gold supply chain.

Table 5: Report other matters

If you want to communicate with the company about the content of the report, you can contact Huang Yourong, the intermediary between Zijin Mining Group Gold Smelting Co., Ltd. Shenzhen Branch and LBMA.

Huang Yourong

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