

广东金正龙科技有限公司
**Guangdong Jinzhenglong Technology
Co., Ltd.**

LPPM

2024 年度

供应链尽职管理合规报告
**Supply Chain Due Diligence
Management Compliance Report**

2025 年 2 月 26 日

February 26, 2025

公司名称：广东金正龙科技有限公司

Company name: Guangdong Jinzhenglong Technology Co., Ltd.

位 置：中国广东省罗定市双东环保工业园厂房 B08 第一层

Location: 1st Floor, Factory Building B08, Shuangdong Huanbao Industrial Park, Luoding City, Guangdong Province, China

年终报告：2024 年度 LPPM 供应链尽职管理合规报告

Year-end report: 2024 LPPM Supply Chain Due Diligence Management Compliance Report

报告日期：2025 年 2 月 26 日

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报告负责人：彭倩倩

Person in charge of report: Peng Qian Qian

报告人职务：合规风控总监 sjinzhenglong@126.com

Position of the person in charge of report: Compliance Risk Control

Director sjinzhenglong@126.com

一、公司概况

I. Company profile

广东金正龙科技有限公司（以下简称金正龙）创立于 2017 年 9 月，坐落于广东省罗定市双东环保工业园。公司专业从事贵金属固体废旧物的资源化回收加工再利用，及贵金属精炼提纯技术开发、鉴定与应用。产品涵盖黄金、铂金、钯金、白银、铑金、铱、钌，产品原料来源于珠宝行业、工业领域以及贵金属回收企业。

Guangdong Jinzhenglong Technology Co., Ltd. (hereinafter referred to as

Jinzhenglong) was founded in September 2017 and is located in the Shuangdong Huanbao Industrial Park, Luoding City, Guangdong Province. The company specializes in the resource recovery, processing, and reuse of solid waste from precious metals, as well as the development, identification, and application of technologies for precious metal refining and purification. Its products cover gold, platinum, palladium, silver, rhodium, iridium, and ruthenium, with raw materials sourced from the jewelry industry, industrial sectors, and precious metal recycling enterprises.

金正龙拥有上海黄金交易所二级会员资质；作为国家高新技术企业，金正龙已取得 35 项国家专利，技术研发实力雄厚。生产厂区占地 1450 平方米，配备黄金、铂金、钯金、白银等多条贵金属精炼生产线，高效赋能贵金属精炼业务。

Jinzhenglong holds the secondary membership qualification of the Shanghai Gold Exchange. As a national high-tech enterprise, Jinzhenglong has obtained 35 national patents, demonstrating strong technical research and development capabilities. The production plant covers an area of 1,450 square meters and is equipped with multiple precious metal refining production lines for gold, platinum, palladium, silver, and other precious metals, efficiently empowering the precious metal refining business.

金正龙锚定行业前沿，引入先进的湿法精炼工艺与设备，自 2018 年 10 月正式投产以来，成效斐然。该工艺优势突出，自动化程度高，生产周期大幅缩减，不仅降低了人工干预误差，还实现了产品质量的稳步跃升，产品纯度指标远超国家标准。其中，铂金产品纯度更是高

达 99.99% 以上，在业内极具竞争力。

Jinzhenglong has positioned itself at the forefront of the industry, introducing advanced wet refining processes and equipment. Since its official commissioning in October 2018, it has achieved remarkable results. This process boasts outstanding advantages, high automation, and significantly shortened production cycles. It not only reduces errors caused by manual intervention but also achieves a steady improvement in product quality, with product purity indicators far exceeding national standards. Notably, the purity of platinum products is as high as over 99.99%, making them highly competitive in the industry.

在产能上，公司展现出雄厚实力，当前黄金、铂金、钯金及铑粉的年精炼提纯能力颇为可观，分别可达 20 吨、10 吨、3 吨、1 吨以上，高效满足市场多元需求。

In terms of production capacity, the company demonstrates substantial strength. Currently, its annual refining and purification capabilities for gold, platinum, palladium, and rhodium powder are impressive, reaching over 20 tons, 10 tons, 3 tons, and 1 ton respectively, effectively meeting the diverse needs of the market.

秉持对品质与环保的执着追求，金正龙于 2021 年 3 月取得 ISO9001:2015 质量体系认证、ISO14001:2015 环境管理体系认证、ISO 45001:2018 职业健康安全管理体系认证，以国际标准严苛律己，全方位夯实企业发展根基，为客户持续输出高品质产品与服务。

Upholding its unwavering pursuit of quality and environmental protection,

Jinzhenglong obtained ISO9001:2015 Quality Management System Certification, ISO14001:2015 Environmental Management System Certification, and ISO 45001:2018 Occupational Health and Safety Management System Certification in March 2021. Adhering to strict international standards, it has comprehensively consolidated the foundation for enterprise development, continuously delivering high-quality products and services to customers.

数载砥砺前行，金正龙公司始终将“以诚为本，信誉优先”的理念，深耕诚信经营之道。公司“龙头 PMSP”商标产品声名远扬，凭借过硬品质与稳定性能，在贵金属行业几乎是“家喻户晓”，成为贵金属原材料领域认可度、流通性的“双标杆”，广受客户信赖。

Over the past few years, Jinzhenglong has been forging ahead with perseverance, always adhering to the principle of "integrity-based, reputation first" and deeply cultivating the way of honest management. The company's "Longtou PMSP" trademark products are renowned far and wide. With excellent quality and stable performance, they are almost "well-known" in the precious metal industry, becoming the "dual benchmark" of recognition and circulation in the field of precious metal raw materials, and are widely trusted by customers.

站在当下、展望未来，金正龙公司以香港为纽带，充分发挥其地缘与金融优势，积极投身到伦敦、纽约、芝加哥、东京等全球顶尖的国际贵金属交易中心的贸易浪潮当中。朝着成为国际化综合性集团企业的宏伟目标稳步迈进，力求在国际经济舞台上站稳脚跟，持续拓展影响力版图，书写属于中国贵金属企业的国际传奇。

Standing in the present and looking ahead to the future, Jinzhenglong, with Hong Kong as a bridge, fully leverages its geographical and financial advantages, actively engaging in the trade waves of top international precious metal trading centers such as London, New York, Chicago, and Tokyo. It is steadily marching towards the grand goal of becoming an international comprehensive group enterprise, striving to gain a firm foothold on the international economic stage, continuously expanding its influence territory, and writing an international legend for Chinese precious metal enterprises.

二、供应商情况概述

II. Overview of suppliers

公司铂金原料主要来源是从中国大陆和中国香港市场回收的含铂金的废旧首饰、含铂金的工业废旧料等。

The main sources of the company's platinum raw materials are platinum-containing scrap jewelry and platinum-containing industrial scrap materials recycled from the Chinese Mainland and Hong Kong markets.

三、合规情况概述

III. Overview of compliance status

公司对所有供应商及其供应链进行尽职调查, 要求所有供应商提供的原料来源合法、合规。

The company conducts due diligence for its suppliers and its supply chain, requiring all suppliers to provide raw materials from legal and compliant sources.

第一步 建立强大的公司管理体系

Step 1: Establish a robust company management system

合规声明与要求：

Compliance statement and requirements:

我们公司已经充分遵守第 1 步骤：建立强大的公司管理体系。

Our company has fully adhered to Step 1: Establishing strong company management system.

公司严格遵守《LPPM 负责任铂钯指南》第一步“建立强大的公司管理体系”的要求，已经建立了强大的管理体系，确保供应链尽职调查工作全面落地。

The company strictly adheres to the requirements of the first step in the LPPM Platinum/Palladium Responsible Guidance, "Establish a Strong Company Management System," and has already established a robust management system to ensure the comprehensive implementation of supply chain due diligence.

1. 政策方面

1. Policy

公司通过并出台了《铂金供应链负责任采购政策》，该政策符合经合组织《来自受冲突影响和高风险地区矿石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，该政策在企业内外部公布于官网链接：<http://www.gdjzltech.com/lppm1.pdf>。

The company has adopted and issued the "Responsible Sourcing Policy for Platinum Supply Chain", which complies with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from

Conflict-Affected and High-Risk Areas and extends to environmental and sustainability responsibilities. The policy is published both internally and externally on the company's official website at the following link:

<http://www.gdjzltech.com/lppm1.pdf>.

政策要求公司及其供应商严格遵守国家关于职工权利、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，确保再生铂金来源符合 LPPM 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、世界遗产遗址等高风险地区的铂金。

The policy requires companies and their suppliers to strictly comply with national laws and regulations regarding employee rights, environmental protection, fair trade, etc., actively participate in supply chain due diligence, ensure that the source of recycled platinum meets the due diligence management requirements of LPPM, and make a commitment to reject platinum from high-risk areas such as regions where human rights are violated, conflict zones, bribery, money laundering, terrorist financing, illegal mining, and world heritage sites.

目前该政策已经通过邮件传达给所有的铂金供应商。

Currently, the policy has been communicated to all platinum suppliers via email.

2. 管理架构

2. Management structure

公司已经建立了内部管理制度，按照出台的政策对管理、作用和职责、内部审计、沟通进行界定、并开展尽职调查体系的管理评审。

2024 年的尽职调查管理体系的管理评审已经在 2025 年 1 月 20-21 日进行，并形成了管理评审报告。

The company has established an internal management system, which defines management, roles and responsibilities, internal audit, and communication in accordance with the policies issued, and conducts management reviews of the due diligence system. The management review of the due diligence management system for 2024 was conducted on January 20-21, 2025, and a management review report was formed.

2.1 规章制度方面

公司根据《LPPM 负责任铂钯指南》制订了《铂金采购尽责管理制度》，主要明确供应链尽职调查组织架构、职责、高风险地区定义，制定高风险供应链评估标准、调查处理程序、交易监控、文件保存等内容。上述制度通过合规风控总监、总经理审批后以红头文件的形式下发，作为文控处理。

2.1 Rules and regulations

The company has formulated the "Platinum Responsible Sourcing Due Diligence Management System" based on the "LPPM Responsible Platinum/Palladium Guidance". This system primarily clarifies the organizational structure and responsibilities for supply chain due diligence, defines high-risk regions, and establishes high-risk supply chain assessment standards, investigation and handling procedures, transaction monitoring, document retention, and other related content. After being approved by the Compliance and Risk Control Director and

the General Manager, the aforementioned system is issued in the form of a red-headed document and handled as a document control matter.

2.2 职责与权限

2.2 Responsibilities and Authorities

公司设置合规风控总监、合规风控专员、合规专员。

The company has set up positions such as Compliance Risk Control Director, Compliance Risk Control officer, and Compliance Specialist.

合规风控总监由公司副总经理负责公司供应链尽职调查工作，建立健全供应链尽职调查管理体系，监督供应链尽职调查流程，协调处理供应链尽职调查中的异常情况，审批合规报告。

The Compliance and Risk Control Director, under the supervision of the Deputy General Manager of the company, is responsible for conducting due diligence on the company's supply chain, establishing and improving the management system for supply chain due diligence, supervising the supply chain due diligence process, coordinating and handling any abnormalities encountered during the process, and approving compliance reports.

合规风控专员指定营运板块的财务部负责人担任，负责有关供应链尽职调查管理的所有事项。负责制定并更新供应链尽职调查政策、制度，负责制定高风险供应链评判标准和执行供应链尽职调查措施，指导、协调、报告公司风险评估、应对和实施等情况，监督、检查各部门的落实情况并考核，汇报供应链尽职调查中的异常情况。同时，对供应链尽职调查进行审核，并评估尽职调查是否充分，必要时收集额外文件或信息。负责有关责任供应链的员工培训，编制并更新供应

链政策，并向高级管理人员提供用于履行职责的适当信息。

The Compliance and Risk Control Officer shall be designated as the head of the finance department within the operational sector, responsible for all matters pertaining to supply chain due diligence management. This includes formulating and updating supply chain due diligence policies and systems, establishing high-risk supply chain evaluation criteria and implementing supply chain due diligence measures, guiding, coordinating, and reporting on the company's risk assessment, response, and implementation, supervising and inspecting the implementation by various departments and conducting assessments, and reporting any anomalies during supply chain due diligence. Additionally, the officer shall review the supply chain due diligence, assess the adequacy of the due diligence, and collect additional documents or information when necessary. The officer is also responsible for training employees involved in responsible supply chains, preparing and updating supply chain policies, and providing senior management with appropriate information for fulfilling their duties.

合规专员由业务部、物流部、财务部、化验室负责人组成，负责严格执行供应链尽职调查措施和高风险供应链评判标准，收集并保存足够的供应链证明文件，建立供应商尽职调查档案，并定期对重要供应商进行现场调查。

The compliance specialist, comprised of the heads of the business department, logistics department, finance department, and laboratory, is responsible for strictly implementing supply chain due diligence

measures and high-risk supply chain evaluation standards, collecting and preserving sufficient supply chain supporting documents, establishing supplier due diligence files, and conducting regular on-site investigations of important suppliers.

公司制定了对合规风控专员、合规专员的问责机制，通过监督与检查，确保供应链尽职调查工作得到有效的实施，规避高风险供应链的交易。要求相关专员定期向高级管理人员汇报供应链尽职调查情况，并及时召开内部会议。

The company has established an accountability mechanism for compliance risk control officer and compliance specialists. Through supervision and inspection, it ensures the effective implementation of supply chain due diligence work and avoids transactions involving high-risk supply chains. Relevant specialists are required to regularly report on the status of supply chain due diligence to senior management and promptly convene internal meetings.

3. 强有力的内部追溯体系

3. A robust internal traceability system

公司建立了一套供应链可追溯体系，收集和维护每一批产品的供应链信息，为每一批出库的产品分配唯一编号。

The company has established a supply chain traceability system to collect and maintain supply chain information for each batch of products and assigns a unique number to each batch of products dispatched from the warehouse.

3.1 供应链可追溯体系

3.1 Supply chain traceability system

所有的供应商都会被进行资信调查，通过尽职调查问卷收集和审查供应商资质、业务运营、股东信息和物料来源等资信调查通过后签订合同，约定原料合法，符合 LPPM 尽职调查政策；供应商送的每一批来料，都有入库单，表明产品类型、重量、验收人员和供应商签字确认；熔炼取样化验，最后形成标准铂金锭，分配唯一编号。

All suppliers will undergo credit investigations. Through due diligence questionnaires, we collect and review supplier qualifications, business operations, shareholder information, and material sources. After passing the credit investigation, contracts will be signed, stipulating that raw materials are legal and comply with LPPM's due diligence policies. Each batch of incoming materials sent by the supplier will have an inventory sheet indicating the product type, weight, acceptance personnel, and supplier's signature for confirmation. Smelting, sampling, and testing will be conducted, and finally, standard platinum ingots will be formed, assigned with unique numbers.

公司对所有交易情况进行监督，确保交易与供应链调查一致。

The company supervises all transactional activities to ensure consistency with supply chain investigations.

公司对供应链尽职调查进行检查，每批来料编号唯一，生产可追溯，对于所有的原料入库均保留完整的单据资料，对于入库的铂金料保存有入库单、检验单、财务凭证等。明确各个部门应在日常工作中收集保存的资料，由业务部、检测部、财务部对相关单据进行保存，

并定期将相关资料送至档案室进行存档，保存期限均高于 5 年。

The company conducts due diligence inspections on the supply chain, ensuring that each batch of incoming materials has a unique number, and that production is traceable. Complete documentation is retained for all raw material stock-ins, including stock-in sheets, inspection sheets, financial vouchers, etc. for platinum materials. Each department is clearly defined to collect and retain relevant documents in their daily work. The Business Department, Inspection Department, and Finance Department are responsible for keeping relevant documents and regularly submitting them to the archives for filing. The retention period is more than 5 years.

3.2 维护资料

在业务开展中，客户的身份证、身份验证资料、营业执照、资质验证资料、供应商尽职调查表、每一批次的入库单、出库单、检测单等相关记录保存 5 年以上。

3.2 Maintenance Documentation

In the course of business operations, relevant records such as customers' ID cards, identity verification documents, business licenses, qualification verification documents, supplier due diligence forms, and each batch's warehousing, ex-warehouse, and inspection forms should be kept for more than 5 years.

3.3 培训

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，组织公司重点岗位以及合规专员对供应链尽职调查管理的要求、内容以及《LPPM 负责任铂钯指南》进行培训，确保供应链尽职调查

管理工作落到实处。2024 年 5 月 8 日与 10 月 9 日组织了两次对公司各相关部门人员与工厂管理人员、生产人员的 LPPM 相关知识培训。

3.3 Training

The company incorporates supply chain due diligence management training into its annual training plan every year, organizing training for key positions and compliance officers on the requirements, content, and LPPM Responsible Platinum/Palladium Guidance for supply chain due diligence management, to ensure that supply chain due diligence management is implemented effectively. On May 8th and October 9th, 2024, two training sessions on LPPM-related knowledge were organized for personnel from relevant departments, factory managers and production staff.

3.4 通过官方银行渠道付款

公司在支付货款时，由市场部门发起资金事项联签程序，通过公司基本户所在的银行网上付款，并打印银行回单作为凭证附件保留以配合政府部门的监管。

3.4 Payment through official banking channels

When the company pays for cargoes, the marketing department initiates the joint signature procedure for fund matters. The payment is made online through the bank where the company's basic account is located, and a bank receipt is printed as a voucher attachment for retention to facilitate supervision by government departments.

4. 强化合作，协助铂金供应链交易方建立尽职调查能力

公司鼓励与供应商建立基于信任和互认的长期关系，特别是遵守

《经合组织关于来自受冲突影响和高风险地区矿石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。

4. Strengthen cooperation and assist platinum supply chain trading parties in building due diligence capabilities

The company encourages the establishment of long-term relationships with suppliers based on trust and mutual recognition, especially those suppliers who adhere to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and extend their responsibilities to environmental and sustainability issues.

公司将铂金供应链的政策与要求通过电子邮件等方式传达给相关交易方，提高供应链交易方建立尽职调查能力。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。

The company communicates its policies and requirements for the platinum supply chain to relevant trading parties through email and other means, aiming to enhance the due diligence capabilities of supply chain trading parties. Both the company and its suppliers must strictly comply with contractual and legal provisions and assist suppliers in building their due diligence capabilities to a greater extent.

公司所有供应商都签署《供应商社会责任承诺书》，该承诺书包含《铂金供应链负责任采购政策》的内容，并要求供应商承诺遵守该政策，承诺铂金来源合法、合规，符合 LPPM 和负责任采购尽职调查的规定。对于公司的主要客户备案其下游客户的发票，规避偷逃税款风险。

All suppliers of the company have signed the Supplier Social Responsibility Commitment, which includes the Responsible Sourcing Policy for Platinum Supply Chain and suppliers are required to commit to complying with this policy, ensuring that platinum sources are legal and compliant, and meeting the requirements of LPPM and responsible sourcing due diligence requirements. For major customers of the company, the company must maintain the invoices from its downstream customers to avoid the risk of tax evasion.

5.建立机密申诉机制

公司利用官方网站链接：

<http://www.gdjzltech.com/lppm2.pdf>，公布电话和邮箱，允许员工和外部利益相关者表达关于负责任供应链与采矿、贸易、加工和出口情况有关的疑虑对供应链或任何新的识别风险的担忧。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员工隐私，对举报人信息保密，杜绝任何行为的打击报复。

2024 年公司未接到员工和外部利益相关者的申诉。

5. Establish a confidential complaint mechanism

The company utilizes the official website link:

<http://www.gdjzltech.com/lppm2.pdf>, which publicizes telephone numbers and email addresses, allowing employees and external stakeholders to express concerns regarding responsible supply chain and mining, trade, processing, and export situations, as well as any new identified risks in the supply chain. The company has established a comprehensive grievance handling procedure, and protects employee privacy throughout the grievance process, keeping the information of the reporter confidential and eliminating any retaliation.

In 2024, the company did not receive any complaints from employees or external stakeholders.

第二步 供应链风险的识别与评估

合规声明与要求:

我公司已经充分遵守第 2 步骤: 对供应链中的风险进行识别和评估。

公司严格遵守《LPPM 负责任铂钯指南》第二步“供应链风险的识别与评估”的要求, 制定了受冲突影响和高风险区域的识别程序(包括标准、引用资源和流程), 制定了高风险供应链的判定标准和对识别出来的风险的处理程序, 充分对供应链中的风险进行识别、评估和缓解。2024 年度, 公司来料主要从中国大陆和中国香港采购含铂金的废旧首饰、含铂金的工业废旧料, 结合公司制定的《受冲突影响和高风险区域的识别程序》中, 判定中国大陆和中国香港为低风险区域。

Step 2: Identification and assessment of supply chain risks

Compliance statement and requirements:

Our company has fully adhered to Step 2: Identifying and assessing risks in the supply chain.

The company strictly adheres to the requirements of the second step of the LPPM Responsible Platinum/Palladium Guidance, "Identification and Assessment of Supply Chain Risks," and has established an identification procedure for conflict-affected and high-risk areas (including standards, reference resources, and processes). It has also formulated criteria for determining high-risk supply chains and procedures for handling identified risks, fully identifying, assessing, and mitigating risks in the supply chain. In 2024, the company mainly sourced platinum-containing scrap jewelry and industrial scrap materials from Chinese Mainland and Hong Kong, China. Based on the company's established "Identification Procedure for Conflict-Affected and High-Risk Areas," Chinese Mainland and Hong Kong, China were determined to be low-risk areas.

1. 识别供应链风险

根据经合组织《来自受冲突影响和高风险地区矿石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，铂金冶炼公司识别相关风险，密切关注来自侵犯人权、武装冲突、非法开采及源于世界遗产遗址等地区的铂金，以及用于贿赂、洗钱、恐怖主义融资等行为的铂金。公司为每个供应商建立供应商档案，根据公司的风险状况进行了调查，在与其签合同之前完成供应商档案的建立工作。

1. Identify supply chain risks

Based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its

extension to environmental and sustainability responsibilities, platinum smelting companies identify relevant risks and closely monitor platinum sourced from areas such as those with human rights violations, armed conflicts, illegal mining, and those originating from World Heritage sites, as well as platinum used for bribery, money laundering, terrorist financing, and other activities. The company establishes supplier profiles for each supplier, conducts investigations based on the company's risk profile, and completes the establishment of supplier profiles before signing contracts with them.

2.评估供应链风险

2.1 供应链调查

公司通过以下措施对供应链进行尽职调查，并完成了尽职调查问卷：

（1）资质验证。对于所有供应商均进行供应链的尽职管理调查，在进行合作前要求合作方提供相应的资质证明文件，法人客户提供营业执照，个人客户提供身份证复印件。矿山客户还需要提供采矿许可证、环评认证以及关注矿工佩戴劳保、健康安全交易、职业病体检。

（2）建立供应商档案。对供应商基本情况、股东信息、实际控制人、供应商管理层架构、提供原料类型及产地、计划精炼贵金属类型、与其供应商结算方式、其供应商概况等信息进行详细调查，并尽可能的将供应链调查向供应商的上游延伸，最终确定其风险等级，对于涉及高风险标准的供应商终止合作。

（3）建立来料登记簿。对供应商当批次来料的日期、重量、原料来源、主要上游供应商进行尽职调查，判断其来料风险等级。

(4) 建立客户专项调研报告工作流程。在走访客户时，对原料来源进行追溯，向供应商传达铂金冶炼公司尽职管理政策，并要求其在政策上签字。

2. Assess supply chain risks

2.1 Supply chain investigation

The company conducted due diligence on the supply chain through the following measures and completed the due diligence questionnaire:

(1) Qualification verification. Due diligence management investigations are conducted on the supply chain for all suppliers. Before cooperation, partners are required to provide corresponding qualification documents. Legal entities are required to provide business licenses, while individual customers are required to provide copies of their ID cards. Mining customers also need to provide mining licenses, environmental impact assessment certifications, and ensure that miners wear labor protection gear, conduct healthy and safe transactions, and undergo occupational disease physical examinations.

(2) Establish supplier profiles. Conduct detailed investigations on suppliers' basic information, shareholder information, actual controllers, supplier management structure, types of raw materials provided and their origins, types of precious metals planned to be refined, settlement methods with suppliers, and supplier profiles. Extend the supply chain investigation upstream to suppliers as much as possible and ultimately determine their risk levels. Terminate cooperation with suppliers that meet high-risk criteria.

(3) Establish an incoming material registration book. Conduct due diligence on the date, weight, raw material source, and main upstream suppliers of the supplier's incoming materials for the current batch and assess their risk level.

(4) Establish a workflow for special customer research reports. During customer visits, trace the source of raw materials, communicate the due diligence management policy of the platinum smelting company to suppliers, and request them to sign the policy.

2.2 受冲突影响和高风险地区判定。公司制定了《受冲突影响和高风险地区的识别流程》。公司使用人权、治理、冲突三方面的资源，以及美国、欧盟和联合国的制裁清单、欧盟的受冲突影响和高风险地区清单、多德弗兰克法案中指明的国家、FATF 国际反洗钱和反恐融资组织的灰名单来识别铂金供应链中的高风险地区。经过评估，公司铂金供应链中的地区中国大陆和中国香港都被识别为低风险地区。

2.2 Determination of conflict-affected and high-risk areas. The company has established the "Identification Process for Conflict-affected and High-risk Areas." The company utilizes resources in three areas: human rights, governance, and conflict, as well as sanctions lists from the United States, the European Union, and the United Nations, the EU's list of conflict-affected and high-risk areas, countries specified in the Dodd-Frank Act, and the gray list of the Financial Action Task Force

(FATF) international anti-money laundering and counter-terrorist financing organization to identify high-risk areas in the platinum supply chain. After evaluation, the regions of Chinese Mainland and Hong Kong in the company's platinum supply chain have been identified as low-risk areas.

2.3 高风险供应链

2.3 High-risk supply chain

根据 LPPM 相关规定，结合公司实际情况，特规定如下高风险供应链评判标准：

（1）矿产铂金或再生铂金来源于、中转或者运经受冲突影响和高风险地区；

（2）矿产铂金声称来源于一个已知储量有限、资源有限或预计产量有限的国家；

（3）再生铂金来源于已知的冲突影响和高风险地区，或者有理由怀疑经此地区中转的；

（4）在供应链中的公司或者其他已知的上游公司位于一个有着洗钱、犯罪和贪污高风险的国家；

（5）在供应链中的公司或其他已知的上游公司的收益所有人是政治敏感人物；

（6）在供应链中的公司或其他已知的上游公司积极参与高风险商业活动（例如武器、赌博、赌业、古董和艺术品、钻石等），宗教和宗教领袖的；

（7）矿产铂金来源于国内手续不全、非法开采的小型矿山，以

及开采铂金源于手工开采；

（8）不遵守环境和可持续发展法律要求，矿产铂金或再生铂金源于世界遗产遗址或国内自然生态保护区；

（9）其他高风险情况。

当上述评判标准任何一条客观存在时，则该供应链被判定为高风险供应链。部门合规专员应立即准备材料上报合规风控专员，由合规风控专员上报合规总监，由合规总监批准采取应对措施，停止交易，消除风险。

In accordance with the relevant regulations of LPPM and in consideration of the actual situation of the company, the following high-risk supply chain evaluation criteria are hereby stipulated:

- (1) Mineral platinum or recycled platinum originates from, transits through, or is transported through conflict-affected and high-risk areas;
- (2) The mineral platinum is claimed to originate from a country with known limited reserves, limited resources, or expected limited production;
- (3) Recycled platinum originates from known conflict-affected and high-risk areas, or there are reasonable grounds to suspect it has transited through such areas;
- (4) Companies in the supply chain or other known upstream companies are located in a country with high risks of money laundering, crime, and corruption;
- (5) The beneficial owner of the company in the supply chain or other known upstream companies is a politically sensitive individual;

(6) Companies in the supply chain or other known upstream companies actively engage in high-risk commercial activities (such as weapons, gambling, betting, antiques and art, diamonds, etc.), religion, and religious leaders;

(7) Mineral platinum is sourced from domestic small mines that have incomplete procedures and engage in illegal mining, as well as from artisanal mining;

(8) Failure to comply with environmental and sustainable development legal requirements, where the platinum used in minerals or recycled platinum originates from World Heritage sites or domestic natural ecological reserves;

(9) Other high-risk situations.

When any of the above-mentioned evaluation criteria objectively exists, the supply chain is deemed to be high-risk. The department compliance specialist should immediately prepare materials and report to the compliance risk control officer, who will then report to the compliance risk control director. The compliance risk control director will approve the implementation of countermeasures to stop transactions and eliminate risks.

2.4 公司建立风险评估流程，对公司铂金供应商风险进行评估：

公司收集了供应商的《尽职调查检查表》，并在对供应商的拜访中对填写的数据进行核查，确认《尽职调查清单》中的文件是否收集齐全》，确保数据的正确性和完成性；根据风险评估标准对供应商进行风险评估并完成《风险评估表》，得出评估结论，即 2024 年公司

铂金供应链均未识别出任何高风险。

2.4 The company establishes a risk assessment process to assess the risks of its platinum suppliers:

The company collected the "Due Diligence Questionnaire" from suppliers and verified the data filled in during visits to supplier to confirm whether the documents in the "Due Diligence Checklist" were fully collected, ensuring the correctness and completeness of the data. Based on risk assessment criteria, the company conducted a risk assessment on suppliers and completed the "Risk Assessment Form", drawing an assessment conclusion that no high risks were identified in the company's platinum supply chain in 2024.

3.向高级管理层报告风险评估

公司建立**风险评估报告**制度,将识别和评估出的风险识别和评估结果汇报给合规总监。2024 年度评估所有铂金供应链均为低风险。

3. Report risk assessment to senior management

The company has established a risk assessment reporting process, which reports the identified and assessed risks and their results to the compliance risk control director. In the 2024 annual assessment, all platinum supply chains were assessed as low risk.

第三步 设计并实施策略来应对已识别的风险

合规声明与要求:

我公司已经充分遵守第 3 步:设计和落实管理体系应对识别的所有风险。

Step 3: Design and implement strategies to address identified risks

Compliance statement and requirements:

Our company has fully complied with Step 3: Designing and implementing a management system to address all identified risks.

公司严格遵守《LPPM 负责任铂钯指南》第三步“设计并实施策略来应对已识别的风险”的要求。2024 年未发现高风险供应链，不需要做风险缓解。

The company strictly adheres to the requirements of Step 3 in the LPPM Responsible Platinum/Palladium Guidance, which involves "designing and implementing risk mitigation strategies to address identified risks." In 2024, no high-risk supply chains were identified, thus risk mitigation plan and implementation is not applicable.

公司制订了《供应链风险减缓管理办法》制定了风险缓解策略，包括（i）在继续交易的同时减轻风险；（ii）在暂停交易的同时减轻风险；或（iii）终止交易，并作为文控管理，约定了在供应商评估及日常业务开展过程中发现的违规情况的处理方式；规范了发现供应商存在高风险行为的处理步骤；明确了尽职管理各级组织、人员的责任，向高级管理人员实施进度跟进。

The company has formulated the "Supply Chain Risk Mitigation Management Measures" and established risk mitigation strategies, including (i) mitigating risks while continuing transactions; (ii) mitigating risks while suspending transactions; or (iii) terminating transactions. As a document control management, it stipulates the handling methods for violations found during supplier evaluation and daily business operations.

It standardizes the handling steps for discovering high-risk behaviors of suppliers and clarifies the responsibilities of organizations and personnel at all levels of due diligence management, with progress follow-up implemented by senior management.

疑似高风险来料后，对其进行单独登记，并告知精炼车间，对其原料单独熔炼，在整个工艺流程中不与其他客户混合，对由其原料生产的成品铂金进行单独编号，并在铂金库中与其他成品铂金分区域存放。

After suspected high-risk incoming materials are received, they should be separately registered and notified to the refining workshop. Their raw materials should be smelted separately and not mixed with those from other customers throughout the entire process. The finished platinum products produced from these raw materials should be individually numbered and stored separately from other finished platinum products in the platinum warehouse.

当供应链调查发现来自高风险区域时，要做加强型尽职调查，包括实地评估，评估政策中的风险。当供应链尽职调查发现可能来自高风险区域，则需立即暂停该矿产铂金、再生铂金的冶炼，直至供应商在 6 个月之内提供可证明其并不可能存在的额外数据或信息为止。若在 6 个月之内仍未提供相关证据，则需立即停止该交易并上报至有关人员。

When supply chain investigations reveal sources from high-risk areas, enhanced due diligence, including on-site assessments, should be conducted to evaluate the risks in policies. If supply chain due diligence

identifies potential sources from high-risk areas, the smelting of platinum from minerals and recycled platinum should be immediately suspended until the supplier provides additional data or information within six months to prove that such sources are unlikely to exist. If relevant evidence is not provided within six months, the transaction should be immediately halted and reported to relevant personnel.

提供的资料包括：

(1) 提供证明不存在有关矿产铂金、再生铂金提取、运输或贸易的系统性或广泛人权侵犯行为的政府性文件，如供应商所在地相关公安或商务部门出具的合法性证明等；

(2) 提供并未向非法武装组织提供直接或间接支持的证明文件；

(3) 提供并未通过欺诈掩盖矿产铂金或再生铂金的原产地证明文件，如相关政府部门出具的原产地证明；

(4) 提供不存在洗钱或恐怖主义融资的证明文件；

(5) 提供国内小型矿山资质证明文件；

(6) 提供环境和可持续发展相关方针政策、制度文件以及通过有关部门环评报告；

The provided materials include:

(1) Provide government documents proving the absence of systematic or widespread human rights violations related to the extraction, transportation, or trade of platinum minerals and recycled platinum, such as legal certificates issued by relevant public security or commerce departments in the supplier's location;

(2) Provide documentary evidence that no direct or indirect support has

been provided to illegal armed organizations;

(3) Provide supporting documents that do not conceal the origin of platinum from minerals or recycled platinum through fraud, such as the certificate of origin issued by the relevant government department;

(4) Provide supporting documents indicating the absence of money laundering or terrorist financing;

(5) Provide qualification certificates for domestic small-scale mines;

(6) Provide relevant policies, institutional documents related to the environment and sustainable development, as well as environmental impact assessment reports approved by relevant departments.

第四步 对精炼商的尽职调查实践开展独立的第三方审计。

合规声明与要求：

我们公司已经充分遵守第 4 步：安排独立第三方审计。

公司严格遵守《LPPM 负责任铂钯指南》第四步“对精炼商的尽职调查实践开展独立的第三方审计”的要求，计划 2025 年聘请 RCS 对公司 2024 年度供应链尽职体系进行审计。

Step 4: Conduct independent third-party audits on the due diligence practices of refiners.

Compliance statement and requirements:

Our company has fully complied with Step 4: arranging for an independent third-party audit.

The company strictly adheres to the requirements of Step 4 of the LPPM Responsible Platinum/Palladium Guidance, which stipulates "conducting

independent third-party audits of due diligence practices for refiners". It plans to engage RCS Global in 2025 to audit the company's supply chain due diligence system for the year 2024.

自 2020 年开始，公司每年均聘请独立的第三方审计机构对财务进行审计，并出具审计报告。

Since 2020, the company has annually engaged independent third-party auditing firms to conduct financial audits and issue audit reports.

第五步 供应链尽职调查年度报告

合规声明与要求：

我公司已经充分遵守第 5 步：有关供应链尽职调查的报告。

公司严格遵守《LPPM 负责任铂钯指南》第五步“供应链尽职调查年度报告”的要求。

Step 5: Annual report on supply chain due diligence

Compliance statement and requirements:

Our company has fully complied with Step 5: Report on supply chain due diligence.

The company strictly adheres to the requirements of Step 5, "Annual Report on Supply Chain Due Diligence," as outlined in the LPPM Responsible Platinum/Palladium Guidance.

公司每年通过广东金正龙科技有限公司官网对供应链尽职调查政策进行公示。

The company annually publicizes its supply chain due diligence policy through the official website of Guangdong Jinzhenglong Technology Co.,

Ltd.

根据 2024 年的尽职调查结果，无供应商需要进行风险缓解的管理策略。在 2024 年年终无评估结果为“暂停合作”或“终止合作”的铂金供应商。供应链尽职管理合规报告将在公司官方网站进行公示。

Based on the due diligence results in 2024, no suppliers require risk mitigation management strategies. There were no platinum suppliers with assessment results of "Suspended Cooperation" or "Terminated Cooperation" at the end of 2024. The supply chain due diligence management compliance report will be publicly disclosed on the company's official website.

四、管理结论

综上所述，在报告年度截至于 2024 年 12 月 31 日的财年内，根据《伦敦铂金市场协会（LPPM）可靠铂金指导原则》的要求，广东金正龙科技有限公司实施了有效的管理制度、程序、流程和实践。广东金正龙科技有限公司致力于不断的改进提升，所有的纠正措施将在内部进行定期监测。纠正性行动计划单独传达给 LPPM 执行机构，以及《伦敦铂金市场协会（LPPM）可靠铂金指导原则》的管理人员。

IV. Management Conclusion

In summary, during the fiscal year ending on December 31, 2024, as reported, Guangdong Jinzhenglong Technology Co., Ltd. implemented effective management systems, procedures, processes, and practices in accordance with the requirements of the "London Platinum and Palladium Market (LPPM) Responsible Platinum Guidance". Guangdong Jinzhenglong Technology Co., Ltd. is committed to continuous

improvement and enhancement, and all corrective measures will be regularly monitored internally. The corrective action plan will be communicated separately to the LPPM executive body and the management personnel responsible for the "London Platinum Market (LPPM) Responsible Platinum Guidance ".

五、其他报告批注

如果本报告用户希望就本报告向广东金正龙科技有限公司进行任何反馈, 则可以通过邮箱 jzl3812303@163.com 联系企业相关部门。

V. Other report annotations

If users of this report wish to provide any feedback to Guangdong Jinzhenglong Technology Co., Ltd. regarding this report, they can contact the relevant department of the company via email at jzl3812303@163.com.