

**Zijin Mining Group Gold Smelting  
Co., Ltd.**

**Responsible Gold Guidance  
Compliance Report**

**Zijin Mining Group Gold Smelting Co., Ltd.**

**27<sup>th</sup> April 2026**

**Table 1:**  
**Company Profile**

<b>Company Name:</b>	<b>Zijin Mining Group Gold Smelting Co., Ltd.</b>
<b>Address:</b>	No. 100 Qingang Road, Shanghang County, Fujian Province, China
<b>Reporting year-end:</b>	31/12/2025
<b>Date of Report</b>	April 27, 2026
<b>Senior management responsible for this report</b>	Wu Weihuang, General Manager

Zijin Mining Group Gold Smelting Co., Ltd. was established in January 2016, formerly known as the Zijin Mining Group Co., Ltd. Gold Smelting Plant was established in 1997. The company is located in Nangang Industrial Development Zone, Shanghang County, and is a registered member of the London Bullion Market Association ("LBMA") and the Shanghai Gold Exchange. It has an annual smelting and production capacity of over 100 tons of high-purity gold.

The Company adheres to relying on technological progress and has independently developed leading equipment in the same industry in China, such as overall pressurized high-temperature cyanide free desorption equipment, vertical constant flow carbon regeneration furnace, and 49 gold refining devices. It has matured industrial technology in fields such as gold bearing carbon analysis, high-purity precious metal refining and processing. Its main products include 1Kg, 3Kg, 12.5Kg standard gold ingots, and 99.999% high-purity gold. The Company serves the Zijinshan Gold Mine as a platform and actively expands the entrusted processing, purchase and sales of external composite gold, as well as the processing and sales of high-purity gold. The factory qualification rate of gold ingots is 100%, and the product quality is better than the standard requirements of the Shanghai Gold Exchange. The Company is the first enterprise in the domestic gold industry to pass the integrated system certification of quality, environment, and occupational health and safety, and has passed the energy management system, automobile quality management system and national safety standardization level 2 enterprise certification.

In 2005, Zijin Mining Group Co., Ltd. organized the "London Bullion Market Association Certification" (LBMA certification), which was passed in March 2006. The gold smelter became one of its qualified delivery gold refiners.

The *Zijin Mining Group Gold Smelting Co., Ltd.'s Responsible Gold Guidance Compliance Report* contains its precious metals responsible sourcing policies, procedures, governance, management systems, and key performance information.

The *Zijin Mining Group Gold Smelting Co., Ltd.'s Responsible Gold Guidance Compliance Report's* reporting criteria comprises the LBMA's Responsible Sourcing Guidance including the Responsible Gold Guidance version 9, the Disclosure Guidance version 3, and the Refiner's Toolkit applied through the Gold Supply Chain Due Diligence Procedure.

**Table 2: Summary of compliance activities**

**Step 1: Establish a Company management system**

. • As of December 31, 2025, we have fully complied with the requirement of Step 1: Establish strong Company gold supply chain management systems.

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

We have released the *Gold Supply Chain Due Diligence Procedure*, which comprehensively incorporates all threat financing risks outlined in Step 1 of the *LBMA Responsible Gold Guidance* ("LBMA RGG"), as well as all ESG (environmental, social, and governance) risk factors. The *Gold Supply Chain Due Diligence Procedure* has been officially published on the Company's website and both internal and external personnel can access the english version via <http://www.zjhjyl.com/lbma/1317.html>.

The Company reviews the the *Gold Supply Chain Due Diligence Procedure* annually and updates the policy when circumstances require, which are then reported to the Board of Directors for review.

Zijin Mining Group Gold Smelting Co., Ltd. clearly recognizes the adverse effects of mining, processing and importing and exporting metal products from conflict areas and high-risk areas, and also clearly recognizes our responsibility to respect human rights and not support conflicts. Zijin Mining Group Gold Smelting Co., Ltd. must adopt the responsible gold supply chain policy that incorporates the risks and risk management measures outlined in *Annex II of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* ("OECD Guidance Annex II"), and extends to addressing adverse ESG factors in the Refiner's primary gold supply chain, and strictly abides compliance with environmental, health, safety and labour regulation in country of operation and/or company policy, and actively participates in the due diligence work of the gold supply chain, and ensures that the source of gold is legal. To this end, we make the following commitments:

1. Adopt a zero-tolerance policy for human rights violations caused by mining, transportation or trading of metals:

1.1 Any forms of torture, or inhuman and degrading treatment.

1.2 Any forms of compulsory labour, that is, forcing anyone to work or provide services in a threatening manner, rather than voluntarily.

1.3 Worst forms of child labour.

1.4 Sexual violence or other gross human rights violations.

1.5 War crimes, or other serious crimes against International Humanitarian Law, against humanity, and for causing genocide.

If we confirm that the upstream supplier has violated any of the above, we will immediately suspend or disengage transactions and contact this supplier.

2. Adopt a zero-tolerance policy for acts directly or indirectly supported by illegitimate non-state armed groups, or public or private security forces:

2.1 Illegally control mines, sites, traders or other intermediaries, and transport routes through the supply chains.

2.2 Illegally tax or extort money or minerals through the supply chains.

3. Do not propose, promise, give or request bribes or kickbacks to individuals, government officials, customers, suppliers or any other organizations in any way, and do not falsely report the origin of gold.

4. Comply with taxes, fees and royalties due to governments related to mineral extraction, trade and export from Conflict-Affected and High-Risk Areas (CAHRAs).

5. Adopt a zero-tolerance policy towards money laundering, terrorism financing, and contribution to conflict behaviors.

6. Adopt a zero-tolerance policy for adverse ESG factors that do not comply with environmental, health, safety and labour regulation in country of operation and/or company policy.

6.1 Environmental management, including:

6.1.1 Failure to comply with air, water, land pollution and incident management plans and water stewardship policies (especially in water scarce and stressed areas).

6.1.2 Unauthorized sourcing from World Heritage Sites and Protected Areas.

6.2 The storage, handling, and disposal of hazardous chemicals (including mercury and cyanide) do not comply with international Cyanide Management Code.

6.3 Failure to comply with management of labour issues, including remuneration, working hours, collective bargaining, discrimination, diversity, disputes and safeguarding of workers.

6.4 Failure to comply with Community engagement and management programmes (land acquisition and community resettlement, cultural heritage sites and indigenous people, closure planning and safeguarding of vulnerable populations).

6.5 Failure to comply with management of business integrity and ethical conduct, and failure to support the implementation of relevant initiatives such as the Extractive Industry Transparency Initiative (EITI).

If we confirm that the upstream supplier has violated any of the above, we will immediately suspend or disengage transactions and contact this supplier.

7. Request our employees, suppliers and business partners to abide by the above policies and take necessary measures to ensure the implementation of the above policies.

Zijin Mining Group Gold Smelting Co., Ltd. is willing to accept the supervision of customers and related stakeholders 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?**

The *Gold Supply Chain Due Diligence Procedure* provides a detailed explanation of our internal management structure to support supply chain due diligence.

**Internal management structure:**

The Board of Directors is responsible for establishing a responsible procurement system and authorizes the subordinate committee to formulate a supply chain due diligence policy tailored to its specific circumstances and to conduct due diligence on the gold supply chain.

The Board of Directors has established a "Responsible Procurement Due Diligence Committee". Under the Committee, a gold supply chain due diligence team has been established, which is responsible for functions such as communication, training, risk identification and assessment. Members of the committee

possess the necessary skills, experience, training, and resources to perform their duties effectively. They regularly receive supply chain compliance training.

The members of the committee (General Manager, Deputy General Manager, Deputy General Manager in charge of market business or Assistant General Manager) have more than five years of senior management experience, responsible for providing the necessary personnel and resources, cooperating with the operation and monitoring of the due diligence process, responsible for the approval of high-risk supply chains, ensuring the effective operation and continuous improvement of supply chain due diligence policies and processes, appointing a Compliance Director and Compliance Officer, and implementing supervision, timely correction, and organizing rectification within a specified time limit for behaviors that fail to achieve risk control.

The Company includes items related to responsible procurement and risk control on the agenda of its annual and quarterly Board of Directors meetings and general manager's executive meetings, and issues resolutions or meeting minutes accordingly.

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 and reports directly to the Board of Directors.

The Compliance Officer position is held by Luo Tianchang, Assistant General Manager, who has more than five years of supply chain management experience, and their responsibilities should include but are not limited to:

1. Review the due diligence process and system of the gold supply chain to meet the objectives of *LBMA RGG* and the risk management needs of refiners.

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.

3. Ensure sufficient resources (including capabilities and experience) to support the operation and monitoring of the supply chain due diligence process and system.

4. Train employees on supply chain risks (including threat financing and ESG) and develop and update gold supply chain policies and procedures for refiners.

5. Review and Know Your Customer or Counterparty (KYC) documents and risk classifications and request additional documents or information if necessary.

6. Ensure appropriate measures are taken for high-risk supply chains or transactions.

7. Provide appropriate and timely information for the Board of Directors to fulfill its duties.

8. Coordinate and organize due diligence on the gold supply chain and review the supply chain due diligence compliance report.

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 results of the risk assessment to the Compliance Director; this independent reporting mechanism ensures that compliance issues are reported promptly and handled independently.

Market department: Responsible for investigating and evaluating suppliers, submitting risk assessment forms. Responsible for compiling and maintaining transaction records. Assist in communication and document translation between the Company and LBMA.

General Office: Responsible for communication and exchange work, promoting various policies, and uploading and distributing information.

Finance Department: Assist the Marketing Department in conducting due diligence and verifying suppliers' business and financial information and provide relevant financial data.

Supervision and Audit Department: Responsible for facilitating complaint and reporting channels, investigating and handling fraudulent activities related to the Company's supply chain.

**Training:**

In 2025, the Compliance Officer organized and coordinated a due diligence team to conduct a specialized training session on the *LBMA Responsible Sourcing Disclosure Guidance*. The training was tailored to the Company's actual risk profile and the characteristics of the gold supply chain, focusing on the identification of Red Flags, the implementation of KYC procedures, and the interpretation of relevant company compliance policies. A total of nine employees participated in the training.

In the same year, company executives attended the LBMA Responsible Sourcing closed-door meeting in Zhaoyuan, Shandong, on August 29; On April 17, a total of 12 people attended the Shanghai Gold Exchange's working meeting on the "Assessment of Green Refining Enterprises Capable of Supplying Standard Gold Bars"; on July 28, 16 people were organized to study the People's Bank of China's "Measures for Anti-Money Laundering and Counter-Terrorist Financing by Precious Metals and Gemstone Institutions"; and on December 2, a total of 14 people attended the Shanghai Gold Exchange's exchange meeting on the "Operational Guidelines for the Management of Accredited Refining Enterprises (Draft for Comment)."

No significant incidents involving violations of internal due diligence procedures occurred during the reporting period.

**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 record.

**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 uses the SAP system and assigns a unique reference number to each batch of input and output materials. 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, thereby tracing them back to their source.

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 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, Shanghai Gold Exchange stock out application forms, etc..

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 *Gold Supply Chain Due Diligence Procedure* during business negotiations, collecting and organizing supply chain due diligence materials, issuing 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 shipment of gold raw materials, corresponding documents such as stock in receipts (including assaying records, weighing records, date and other relevant information.), official invoices, packing lists, etc. are kept by the market department. The retention period of the transaction record has been set in accordance with relevant laws and regulations which is not less 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.

No unusual incidents related to unclear counterparty identities, unknown sources, or breaks in traceability occurred during the reporting period.

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

During the contract signing period, we communicated with the supplier and requested that they commit to complying with our *Gold Supply Chain Due Diligence Procedure* and inform the supplier of the purpose and requirements of the gold supply chain due diligence system. We invite suppliers to fill out 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.

Regarding the capacity building of suppliers, we organized a communication session with suppliers on June 11, aimed at assisting them in establishing due diligence capabilities and providing policy training. The key communication areas included the prohibition of materials sourced from conflict or high-risk areas, ESG factors, labour rights, and anti-corruption measures.

We support the implementation of the Principles of the Extractive Industries Transparency Initiative (EITI). During the reporting period, the Company did not procure mined gold from state-owned enterprises in EITI countries, nor were there any disclosures regarding "first-trade" payments to EITI countries' state-owned enterprises.

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

The Company has formulated the "*Reporting Management Measures for Zijin Mining Group Gold Smelting Co., Ltd.*", and the disciplinary inspection, supervision and audit departments of the group and the Company are specialized departments responsible for receiving and processing grievance information and providing protection for whistleblowers, independent of the business departments. The grievance mechanism is open to internal and external stakeholders, everyone can report, and the informant has the

right to report anonymously.

The reporting channels include special reporting telephone (0597-3996322), reporting mailbox(hjlyxgsjcsj@126.com), network platform(hjyl.zjky.cn), mobile phone platform (WeChat official account) and opinion mailbox.

All reports will be investigated by dedicated personnel 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 deadline needs to be extended under 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 according to 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 and punishment, the case will be closed. For those who require accountability and punishment, the investigation report and handling suggestions must be submitted to the Company's authorized agency 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 reported and clarified within a certain range if necessary to eliminate the impact. For real name reports, the Company will provide feedback on the results to the whistle blower within 5 working days after the investigation and handling are completed; For anonymous reports, 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 shows the report is not true, it will be ignored.

When communicating with internal employees, we use information sharing channels such as promotional columns and government disclosure columns to ensure that employees understand the intent of the due diligence policy and the status of LBMA gold due diligence work. Implement the petition policy, establish an opinion box to solicit opinions from employees, and facilitate their supervision and evaluation.

As of December 31, 2025. No grievances regarding the gold supply chain were received during the reporting period.

## **Step 2: Risk identification and assessment**

- As of December 31, 2025, 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 risk identification standards of location risk, supplier risk, risk identification for mined gold from LSM, risk identification for mined gold from ASM, and risk identification for recycled gold in the *Gold Supply Chain Due Diligence Procedure*, in accordance with the second step of *LBMA RGG*, as well as the requirements of the OECD Guidance Annex II, and taking into account adverse ESG factors in the Company's gold supply chain.

We have released the *Gold Supply Chain Due Diligence Procedure*, which stipulates the due diligence process for identifying risks. Sources of such an integrated assessment must include, but are not limited to: Sanctions lists (US, UK, EU, UN, and relevant sanctions lists), Dodd Frank s. 1502, EU CAHRA list, Heidelberg Barometer, Fragile States Index or equivalent, UN Human Rights Office of the High Commissioner or equivalent, Reports (including relevant country reports) by the Financial Action Task Force (FATF), Credible market intelligence on high-risk gold centers/transit hubs and on countries where

there is a high risk of money laundering.

**Supply chain due diligence:**

Our risk identification and assessment work was conducted by members of the due diligence team with extensive supply chain experience. We use the KYC questionnaire (this survey questionnaire is from the template published on the LBMA official website). In risk identification, we assess 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.

**Monitoring of transactions:**

We continuously review and supervise the process of transaction correlation to ensure consistent understanding of the supply chain and risk prediction during transactions. We obtain and record the following information for each batch of raw materials received: weighting, assaying 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 inconsistency or suspicion in the trading background, the relevant gold will be physically segregated and secured (until the inconsistencies are 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, 2025, the Company has completed the risk identification 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 and we have no zero-tolerance or high-risk suppliers. 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 *Gold Supply Chain Due Diligence Procedure* based on the relevant provisions of the LBMA and OECD Guidance Annex II, and considering adverse ESG factors in the gold supply chain of refiners. The risk assessment results are classified 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 include:

- 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 criteria for high-risk supply chains include:

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 frequent 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.

We conduct a comprehensive evaluation of all suppliers at least once every 12 months. 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.

In response to the disclosure requirements of Disclosure Guidance version 3 regarding the Company's Transparency Roadmap, the following information is disclosed:

During the reporting period, one supplier sourced its gold materials from the Aurora Mine operated by Aurora Gold Limited (a member mine of the World Gold Council). The Aurora Mine is located in Guyana, South America, approximately 170 km west of the capital city of Georgetown and approximately 130 km northwest-northwest of the town of Bartica, situated at the confluence of the Essequibo and Cuyuni Rivers.

During the reporting period, the Company did not encounter the following situations: (1) gold-bearing materials originating from or transiting through OECD Red List regions; (2) gold-bearing materials claimed to originate from recycled/scrap or mixed sources, but whose refining location or known/reasonably suspected transit route was located in an OECD Red List regions. Therefore, there are no relevant intermediate refiners or local exporters whose identities need to be disclosed.

### **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. Site Visit Reports for Mined material and Recycled material are adopted. We conduct dynamic monitoring of high-risk supply chains and decide the frequency of site visits based on the results of risk assessments.

As part of EDD, the site visit will be performed by capable refinery staff. Third party suppliers will be engaged when necessary. As required by the policy, site visit should take place before the transaction with suppliers or at least within six months after the transaction. When site visits are not feasible, the Company will employ alternative procedures such as conducting remote interviews via video conferencing and gathering data for desk research.

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 implementing the appropriate risk management strategy. There were no high-risk intermediate refiners during the reporting period.

During the reporting period, two EDD processes were triggered. Based on risk considerations, the Company conducted a total of two site visits during the reporting period, both of which targeted prospective partners. The site visits were conducted by key personnel within the Company who possess many years of management experience and deep expertise in the gold supply chain. The inspection process included reviewing financial reports, licenses, and other documentation; interviewing Company management and frontline workers; conducting site visits to mines and production/processing facilities; and communicating with local communities to verify information.

Among these, materials sourced from Aurora Gold Limited in Guyana were initially identified with medium/high risk indicators due to the presence of artisanal and small-scale mining (ASM) risks in the

region. Following site visits, the risk was reassessed as low, meeting the criteria for cooperation.

Materials sourced from the Colombia branch of Continental Gold Limited in Colombia were initially rated as high risk due to the mine's location in a conflict-affected and high-risk area. Site visit confirmed that the Company had implemented robust internal and external control measures, and no irregularities or illegal activities were identified during the investigation; consequently, the risk was reassessed as low. We did not source from Colombia in 2025.

### **Step 3: Risk management**

- As of December 31, 2025, 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 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 risk assessment based on the collected information.

We adopt different risk management strategies based on the results of risk assessment, including continue, suspend and/or disengage with a counterparty. According to the relevant policies, for identified high-risk supply chains, our company will suspend cooperation and adopt strengthened due diligence measures in accordance with the requirements of the guidance. We will 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 and cannot be improved by improvement plans, 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 officers. Any zero-tolerance and high-risk supply chains identified during the Company's business operations, as well as the corresponding risk response strategies, the status of counterparties under risk mitigation, progress of mitigation measures, and effectiveness of improvement plans will be regularly communicated to the Board of Directors

In 2025, the risk mitigation measures were not conduct, the Company did not terminate its cooperation with any suppliers, nor did it enter into any partnerships with government agencies.

### **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.**

Considering qualifications, prices, and service capabilities, we have engaged Deloitte Touche Tohmatsu Certified Public Accountants LLP to provide third-party limited assurance services for the 2025 Responsible Gold Guidance Compliance Report and will release an independent limited assurance report based on ISAE3000.

The Board of Directors fulfills its oversight responsibilities by reviewing and approving the appointment of the assurance provider and confirming that the provider has no conflicts of interest with the Company that could compromise its independence.

The Compliance Report and Assurance Report can be obtained through our official website. There was no non-compliance during this and the previous reporting period.

### **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 2025 Responsible Gold Guidance Compliance Report, which reports on our compliance with the *LBMA RGG* as of December 31, 2025.

### **Table 3: Summary of Compliance Activities for Forced Labour**

#### **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 RGG*. In 2025, the Company conducted risk identification for all cooperative suppliers and did not find any high-risk suppliers.

When the Market department signs business contracts with suppliers, the terms of the contract are clear: the 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 *OECD Guidance Annex II*.

In addition, we have developed the *Gold Supply Chain Due Diligence Procedure*, which incorporates the risk and risk management measures outlined in Annex 2 of the *OECD Guidance Annex II* 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 the 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.

We have formulated the "*Reporting Management Measures for Zijin Mining Group Gold Smelting Co., Ltd.*", and everyone can anonymously report. In 2025, the Company did not receive any reports related to forced labour.

## Overall conclusion

<b><u>Table 4: Management conclusion</u></b>	
<b>Does the refinery meet the requirements of the LBMA Responsible Gold Guidance during the reporting period?</b>	
<i>YES</i>	As of December 31, 2025, the Company complied with the requirements of the <i>LBMA RGG</i> compliance requirements. In the future, we will continue to implement the requirements and continuously improve the management of the gold supply chain.

<b><u>Table 5: Report other matters</u></b>
<p>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. and LBMA.</p> <p>Huang Yourong Address: Zijin Building, No.1 Zijin Road, Shanghang County, Fujian Province Postal Code: 364200 Phone: +86 597 3998053 Fax: +86-597-3883997 Email: <a href="mailto:huang_yourong@zijinmining.com">huang_yourong@zijinmining.com</a></p>