Golden Phoenix
Global Limited

負責任供應鏈與採購政策

政策承諾（COP 5、7）

GOLDEN PHOENIX GLOBAL LIMITED（「本公司」）致力以負責任、透明及誠信的方式進行貴金屬採購及貿易。本公司按照責任珠寶業委員會（RJC）《行為準則》、經濟合作與發展組織（OECD）有關受衝突影響及高風險地區礦產供應鏈盡職調查指引，以及適用法律及行業要求，建立與本公司業務規模及風險相稱的供應鏈管理制度。

適用範圍（COP 5、7）

本政策適用於本公司的董事、管理層、員工、供應商、客戶及代表本公司行事的業務夥伴。本公司現時從事金、銀、鉑、鈀及銠的 B2B 貴金屬貿易及對沖，不直接向礦場、手工及小規模採礦商（ASM）或非正式回收來源採購，亦不從事寄售或 B2C 銷售。

供應鏈原則（COP 5、7）

(a) 不容忍供應鏈涉及嚴重侵犯人權、童工、強迫勞動、人口販運、戰爭罪、反人類罪或種族滅絕罪；

(b) 不直接或間接支援非法非國家武裝團體，或容忍公共或私人保安力量的不當行為；

(c) 不容忍賄賂、回扣、疏通費、洗錢、欺詐性原產地聲明，或規避依法應付的稅項、費用及特許費；

(d) 對交易對手進行與風險相稱的身份、實益擁有人、制裁、政治人物、負面消息及供應鏈盡職調查；

(e) 保存貨品種類、重量、成色、精煉廠或其他合理來源證據、付款及交收資料，並按風險性質採取加強盡職調查、有時限的風險管理計劃、暫停或終止合作等措施。

業務夥伴及申訴（COP 5、7.1a、2.6）

本公司會向主要業務夥伴傳達本政策，並期望其採取與負責任商業行為一致的措施。任何員工、業務夥伴、受影響人士或其他持份者均可透過本公司公布的申訴及舉報渠道提出關注。本公司會以保密、公平及不報復的原則處理相關事項。

認可及生效

職銜：總經理｜生效日期：2026 年 9 月 24 日

本政策會定期覆核，並在適用法例、RJC 要求、業務範圍或主要風險出現重大變更時作出修訂。

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Responsible Supply Chain and Procurement Policy

Policy Commitment (COP 5, 7)

GOLDEN PHOENIX GLOBAL LIMITED (the "Company") is committed to sourcing and trading precious metals responsibly, transparently and with integrity. In accordance with the Responsible Jewellery Council (RJC) Code of Practices, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and applicable legal and industry requirements, the Company maintains a supply chain management system proportionate to its business scale and risks.

Scope (COP 5, 7)

This Policy applies to the Company's directors, management, employees, suppliers, customers and business partners acting on its behalf. The Company currently conducts B2B trading and hedging of gold, silver, platinum, palladium and rhodium. It does not source directly from mines, artisanal and small-scale miners (ASM), or informal recycling sources, and does not engage in consignment or B2C sales.

Supply Chain Principles (COP 5, 7)

(a) No tolerance for serious human rights abuses, child labour, forced labour, human trafficking, war crimes, crimes against humanity or genocide in the supply chain;

(b) No direct or indirect support for illegal non-state armed groups, and no tolerance for misconduct by public or private security forces;

(c) No tolerance for bribery, kickbacks, facilitation payments, money laundering, fraudulent declarations of origin, or evasion of legally required taxes, fees and royalties;

(d) Risk-proportionate due diligence on counterparties, including identity, beneficial ownership, sanctions, politically exposed persons, adverse media and supply chain checks;

(e) Retention of information on product type, weight, fineness, refinery or other reasonable evidence of origin, payment and delivery, with enhanced due diligence, time-bound risk management plans, suspension or termination of business relationships applied according to the nature of the risk.

Business Partners and Grievances (COP 5, 7.1a, 2.6)

The Company communicates this Policy to key business partners and expects them to adopt measures consistent with responsible business conduct. Employees, business partners, affected persons and other stakeholders may raise concerns through the Company's published grievance and whistleblowing channels. Matters will be handled confidentially, fairly and without retaliation.

Endorsement and Effective Date

Designation: General Manager | Effective date: 24 September 2026

This Policy is reviewed periodically and revised when there are material changes to applicable laws, RJC requirements, the scope of the business or key risks.