Golden Phoenix
Global Limited

責任珠寶業委員會（RJC）政策

本文件由 GOLDEN PHOENIX GLOBAL LIMITED 自行制定，用以支持本公司之責任珠寶業委員會（RJC）預備會員（Candidate Member）身分及《行為準則》2024 年版認證程序；本文件並非由責任珠寶業委員會發出、批准或認可。

政策承諾（COP 2.1）

GOLDEN PHOENIX GLOBAL LIMITED（「本公司」）承諾依循責任珠寶業委員會（RJC）《行為準則》全部適用條款營運業務，並將道德、人權、社會及環境考量融入日常營運、業務規劃及決策過程。本政策為本公司 COP 合規體系的總綱，統領各附屬政策及程序；如附屬政策與本政策條款重疊，以較嚴謹的標準為準。本公司現為 RJC 預備會員（Candidate Member），正進行首次認證審核；在取得認證前，本公司不會作出任何 RJC 認證聲稱。

適用範圍（COP 2.1、2.2）

本政策適用於本公司的董事、管理層及全體員工，並延伸適用於代表本公司行事的業務夥伴、供應商、客戶及承辦商。本公司現時在香港從事金、銀、鉑、鈀及銠的 B2B 貴金屬貿易及對沖，不涉及採礦、勘探或礦物加工，亦不直接向手工及小規模採礦商（ASM）或非正式回收來源採購，且不從事寄售或 B2C 銷售。

我們的承諾（COP 1、5、6、7、11、12、14、22 至 25、27 至 29）

(a) 遵守香港及其他適用法例，並在適用法例與 RJC《行為準則》之間採用較嚴謹者（COP 1）；

(b) 尊重人權，不容忍童工、強迫勞動、人口販運、歧視、騷擾及任何形式的欺凌（COP 6、22、23）；

(c) 對賄賂、回扣及疏通費採取零容忍態度，不設任何例外（COP 11）；

(d) 執行客戶盡職審查、制裁名單及政治人物篩查、持續監察及可疑交易報告，防範洗錢及恐怖融資（COP 7、12）；

(e) 按經濟合作與發展組織（OECD）五步法，對金、銀、鉑、鈀、銠的供應鏈執行盡職調查（COP 5、7）；

(f) 準確披露金屬種類、成色、重量及規格，不作出誤導或未經核實的聲稱（COP 14、29）；

(g) 維持安全、健康的工作環境，並提供所需的資料、培訓及防護（COP 24）；

(h) 識別並管理環境因素，按月記錄能源、用水及其他資源的使用，並每年量化 Scope 1 及 Scope 2 溫室氣體排放（COP 25、27、28）；

(i) 按香港《個人資料（私隱）條例》及本公司《個人資料（私隱）處理政策》保障個人資料；

(j) 提供保密、可及的申訴與舉報渠道，並嚴格禁止報復（COP 2.6）。

管治與責任（COP 2.3、2.7）

總經理為 COP 合規的最終負責人，向董事會負責，並負責批准本政策體系及其重大修訂。副經理兼 RJC 合規統籌人獲授權統籌本政策體系的日常執行、記錄保存及對外聯繫 RJC 事宜，且在執行合規職責時具備獨立於業務部門的決策權。本公司每年至少一次由總經理會同合規統籌人覆核本政策體系的適當性、充分性及執行成效。

傳達、培訓與公開（COP 2.4、3.1a）

本政策透過開戶文件、合約條款及電郵向業務夥伴傳達。全體員工均須接受與其職務相關的政策及程序培訓。本政策及各附屬政策的公開版本於公司網站 http://www.goldenphoenix.hk/about.html#Policy 刊載，供公眾查閱。

申訴與舉報（COP 2.6）

任何員工、業務夥伴、受影響人士或其他持份者均可透過 report@goldenphoenix.hk（一般事項）或 kyc@goldenphoenix.hk（客戶盡職審查及供應鏈事項）提出關注，並可匿名提出。本公司會於 3 個工作日內確認收悉，並以 30 個工作日為完成目標。本公司嚴格禁止對善意提出關注或參與調查的任何人作出報復，亦不限制其透過司法、監管或其他外部途徑尋求救濟。

覆核及語言（COP 2.7）

本政策至少每年覆核一次，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。本政策的繁體中文版本與英文版本如有歧義，以英文版本為準。

認可及生效

職銜：總經理｜生效日期：2026 年 9 月 24 日

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Responsible Jewellery Council Policy

This document is adopted by GOLDEN PHOENIX GLOBAL LIMITED in support of its status as a Candidate Member of the Responsible Jewellery Council (RJC) and of its certification process against the RJC Code of Practices 2024. It is not issued, approved or endorsed by the Responsible Jewellery Council.

Policy Commitment (COP 2.1)

GOLDEN PHOENIX GLOBAL LIMITED (the "Company") is committed to operating its business in accordance with all applicable provisions of the Responsible Jewellery Council (RJC) Code of Practices, and to integrating ethical, human rights, social and environmental considerations into its day-to-day operations, business planning activities and decision-making processes. This Policy is the highest-level document of the Company's COP compliance system and governs the subsidiary policies and procedures. Where a subsidiary policy overlaps with this Policy, the more stringent standard applies. The Company is an RJC Candidate Member undergoing its initial certification audit. No claim of RJC certification is made before certification is achieved.

Scope (COP 2.1, 2.2)

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

Our Commitments (COP 1, 5, 6, 7, 11, 12, 14, 22 to 25, 27 to 29)

(a) Comply with the laws of Hong Kong and other applicable law, and apply the more stringent of applicable law and the RJC Code of Practices (COP 1);

(b) Respect human rights, with no tolerance for child labour, forced labour, human trafficking, discrimination, harassment or bullying of any kind (COP 6, 22, 23);

(c) Apply a zero-tolerance approach to bribery, kickbacks and facilitation payments, without exception (COP 11);

(d) Carry out customer due diligence, sanctions and politically exposed person screening, ongoing monitoring and suspicious transaction reporting to prevent money laundering and terrorist financing (COP 7, 12);

(e) Apply the OECD five-step due diligence framework to the supply chains of gold, silver, platinum, palladium and rhodium (COP 5, 7);

(f) Disclose accurately the type, fineness, weight and specification of metals, and make no misleading or unverified claim (COP 14, 29);

(g) Maintain a safe and healthy working environment, and provide the information, training and protection required (COP 24);

(h) Identify and manage environmental aspects, record energy, water and other resource use monthly, and quantify scope 1 and scope 2 greenhouse gas emissions annually (COP 25, 27, 28);

(i) Protect personal data in accordance with Hong Kong's Personal Data (Privacy) Ordinance and the Company's Personal Data (Privacy) Handling Policy;

(j) Provide a confidential and accessible grievance and whistleblowing channel, and strictly prohibit retaliation (COP 2.6).

Governance and Responsibility (COP 2.3, 2.7)

The General Manager is the ultimate owner of COP compliance, is accountable to the Board, and approves this policy system and material amendments to it. The Deputy Manager and RJC Compliance Coordinator is authorised to coordinate day-to-day implementation, record keeping and liaison with the RJC, and exercises decision-making authority independent of the business units when performing compliance duties. At least once a year the General Manager, together with the Compliance Coordinator, reviews the continuing suitability, adequacy and effectiveness of this policy system.

Communication, Training and Publication (COP 2.4, 3.1a)

This Policy is communicated to business partners through account-opening documents, contract terms and email. All employees receive training on the policies and procedures relevant to their roles. The public versions of this Policy and of the subsidiary policies are published on the Company's website at http://www.goldenphoenix.hk/about.html#Policy and are available to the public.

Grievance and Whistleblowing (COP 2.6)

Any employee, business partner, affected person or other stakeholder may raise a concern through report@goldenphoenix.hk (general matters) or kyc@goldenphoenix.hk (customer due diligence and supply chain matters), including anonymously. Receipt is acknowledged within three working days and the target for completion is 30 working days. The Company strictly prohibits retaliation against anyone who raises a concern or participates in an investigation in good faith, and does not restrict that person from seeking remedy through judicial, regulatory or other external channels.

Review and Language (COP 2.7)

This Policy is reviewed at least annually and is revised where there are material changes to applicable law, RJC requirements, the scope of the business or key risks. In the event of any inconsistency between the Traditional Chinese and English versions of this Policy, the English version prevails.

Endorsement and Effective Date

Designation: General Manager | Effective date: 24 September 2026