Golden Link International Industrial Limited Supply Chain Policy for Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs)

Golden Link International Industrial Limited (GL) recognized that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognizing that we have the responsibility to respect human rights and not contribute to conflict, GL commit to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user.
GL commit to refraining from any action which contributes to the financing of conflict, and we commit to comply with relevant OECD Due Diligence Guidance for Responsible supply chain form conflict-affected and High-risk areas, United Nations sanctions resolutions or, where applicable, Hong Kong laws implementing such resolutions.

Regarding serious abuses associated with the extraction, transport or trade of minerals

1. While sourcing from, or operating in, conflict-affected and high-risk areas, GL will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:
i) any forms of torture, cruel, inhuman and degrading treatment;
ii) any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
iii) the worst forms of child labour;
iv) other gross human rights violations and abuses such as widespread sexual violence;
v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide,
vi) Health & safety measures abuse or violations.

Regarding risk management of serious abuses

2. GL will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

Regarding direct or indirect support to non-state armed groups

3. GL will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is

not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:
i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
ii) illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
iii) illegally tax or extort intermediaries, export companies or international traders.

Regarding risk management of direct or indirect support to non-state armed groups

4. GL will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

Regarding public or private security forces

5. GL agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.
6. GL recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.
7. GL will support or take steps to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.
8. GL will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.
9. GL will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

Regarding risk management of public or private security forces

10. In accordance with the specific position of the company in the supply chain, GL will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where GL identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same way.

Regarding bribery and fraudulent misrepresentation of the origin of minerals

11. GL will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport, and export.

Regarding money laundering, terrorist financing and weapons of mass production proliferation

12.GL will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering, terrorist financing and weapons of mass production proliferation from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

Regarding the payment of taxes, fees and royalties due to governments

13. GL will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments if necessary.

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering, terrorist financing and weapons of mass production proliferation and payment of taxes, fees and royalties to governments

14. In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

Regarding involvement of cash

15. GL shall avoid, where practicable, cash purchases for any precious metal exceed the value of HKD120,000 or equivalent value in cash

Golden Link International Industrial Limited requires all our staff involved in the precious metal supply chain to strictly comply with this policy and implement it in the management system.

For assistance or future queries related to the supply chain policy, employees, stakeholders, and counterparties can send email to compliance@goldenlinkhk.com



YEUNG MAN LAI

DIRECTOR

15 AUG 2023