

# **Shenzhen Zhaoya Jewelry Technology Co., Ltd.**

## **Due diligence report for the financial year ended 31<sup>st</sup> December 2025 of RJC COP 2019**

With its COP (Code of Practices) standards, the Responsible Jewellery Council stands for sustainable, responsible, ethical business practices and transparent supply chains in the global supply chain of gold, platinum group metals, silver, diamonds and coloured gemstones. Jewellery manufacturers and retailers involved in the initiative are committed to preventing corruption, money laundering and the financing of conflict and terrorism. They ensure healthy and safe working conditions. The participants also want to conserve natural resources and respect human rights.

The standards for companies in the precious metals supply chain include public reporting on due diligence in accordance with the OECD Due Diligence Guidance ("OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRA - Conflict-Affected and High-Risk Areas").

As a dedicated member of RJC, the establishment of internal management structures for a system of due diligence, controls and transparency in the supply chain (including tracking / identification of other stakeholders) has been completed, as has the definition of associated responsibilities. The due diligence process is described in a corresponding company document and the responsible employees were named.

Risks along the supply chain are reviewed in accordance with the current OECD Due Diligence Guidance, i.e. material and suppliers are monitored to ensure that they do not contribute directly or indirectly (e.g. by financing participants / money laundering) to conflicts or their negative effects such as lack of security, widespread violence, human rights violations, violations of national law and international law.

### **Internal control system**

The system is effectively adapted. The core elements are:

An ERP system (Production system - JPS, Human Resources system - HRS) makes it possible to collect and provide all the information from each transaction on time. The systems keep track of all material and information flow.

-Precious metal accounts

Identification of the supplier and the origin of the material by means of access to international data. This applies both to accepted recycled material and to the fine metals used in production.

In the case of identified risks/violations, measures must be taken to avoid or contain risks. Business relationships can be suspended or terminated depending on the risk assessment and the success of any measures taken.

## **Identification and assessment of risks along the supply chain**

Our due diligence of new customers (KYC) was conducted in accordance with the established and proven procedure for RJC - COP7 - Due Diligence Guidance.

All material in use in Shenzhen Zhaoya Jewelry Technology Co., ( in accordance with the definition of RJC on fine gold/silver and PGM for production of semi-finished products ) are on principle only purchased from refineries (directly or indirectly via bank) that are certified according to the LBMA / RJC-CoC standard or directly from "Myer Jewelry Manufacturer Limited". Our Stone in use ( Diamond, Colored Gem Stone ) are 100% purchased from "Myer Jewelry Manufacturer Limited".

## **Warning Signs (Red Flag)**

No warning signs ("red flags") were detected during the reviews in the reporting period, so no measures to contain or avoid risk were necessary.

## **System improvement**

Shenzhen Zhaoya Jewelry Technology Co., Ltd. is subject to an implemented continuous improvement process internally, which encompasses all company processes and fulfils all RJC certification requirements. Our system has been reviewed and updated regularly.

## **Summary audit reports**

**The year of 2025, Shenzhen Zhaoya Jewelry Technology Co., have no conflict with RJC guidance.**

This summarized audit results will be distributed to all staffs and our business partners.