

Chifeng Jilong Gold Mining Co., Ltd.
Anti-Corruption and Anti-Bribery Policy

1. Purpose

In order to solidly promote the anti-corruption and anti-bribery work of the commercial activities of Chifeng Jilong Gold Mining Co., Ltd. (hereinafter referred to as the "Company"), strengthen the internal control mechanism of the enterprise, achieve honesty and trustworthiness, establish the business philosophy of law-abiding integrity and high-quality service as the core, after taking into consideration the actual situation of the Company, this procedure is formulated to strengthen institutional supervision, promote institutional anti-corruption, enhance the supervision and management of key links and key departments that are prone to frequent corruption to ensure the commitment to the management of commercial bribery and strict compliance with the rules of fair competition, guiding the Company's management personnel and relevant interest groups (such as customers, suppliers, etc.) to act in accordance with the law, be honest and trustworthy, consciously resist negative and corrupt phenomena such as disregarding moral principles in pursuit of profit, making personal gains at the expense of the general public, lack of credit, deception, fraud, etc. so as to build a good corporate image.

2. Scope of application

2.1 This procedure applies to all economic activities involving material procurement, outsourced processing, engineering construction of facilities, product sales, equipment procurement and maintenance, quality supervision, and the management process of human, funds and properties within the Company.

2.2 All customers, suppliers, service providers and contractors who do business with the Company are also within the scope of this procedure.

3. Management procedures

3.1 The commercial bribery prevention commitment system for personnel in key links and key locations should be implemented, and individuals in important positions should sign the "Anti-Bribery/Anti-corruption Commitment letter".

3.2 As the supervision and management department of the commitment system for the prevention of commercial bribery, the main responsibilities of the legal department of the Company include:

- (1) Carry out corporate governance of commercial bribery in accordance with relevant national policies, laws, regulations and rules;
- (2) Exercise the duties of discipline inspection and supervision in accordance with the law;
- (3) Strengthen the supervision and management of the honest practice of personnel in important positions and links;

(4) Strengthen the prevention and control of corruption at the source, persist in treating both the symptoms and the root causes, improve the development of systems, and make true records of the honest practice of personnel in important positions and links;

(5) Responsible for tracking and supervising the company's implementation of this procedure.

3.3 The employees making commitment/Company shall comply with the following responsibilities:

(1) Strictly practice the content promised in the letter of commitment;

(2) Prohibition of any form of commercial bribery;

(3) Consciously accept the management of the legal department;

(4) Accept the recommendations for dealing with violation of commitment if there is any by the supervision and management department in accordance with the relevant regulations.

3.4 In carrying out the work of controlling commercial bribery, the legal department of the Company and relevant departments should strengthen information communication and cooperate with each other.

3.5 Anti-bribery/anti-corruption activities are carried out mainly as follows:

(1) Establish a leadership team for the management of commercial bribery to carry out the work of controlling commercial bribery;

(2) Set up a tip-off box for commercial bribery prevention and publish the reporting telephone number.

(3) In the process of implementing anti-bribery/anti-corruption, the Company's management department conducts overt investigation and covert visits to other departments to keep abreast of the signs of commercial bribery, and adopts and rolls out measures to prevent commercial bribery;

(4) Carry out investigation and research, take a hold of the characteristics of corrupt acts and commercial bribery so as to come up with specific countermeasures and actions in education, policies, supervision and other effective prevention, and promptly solve emerging problems.

3.6 Promptly deal with problems found in the prevention of commercial bribery. In carrying out efforts to prevent commercial bribery, all departments shall promptly stop or deal with violations of discipline and regulations discovered and report the situation to the relevant departments, and those suspected of committing crimes shall be transferred to the judicial organs for handling.

3.7 All units of the Company shall strengthen the management of personnel in important positions, and take their implementation of the "Letter of Commitment" as an important content for evaluation and assessment and an important basis for appointment and removal.

3.8 The administrative department of the Company shall, on the basis of its duties and authority, supervise and inspect the implementation of these Measures, and deal with or put forward suggestions for the non-performance of the "Letter of Commitment" of personnel in important positions.

3.9 Where personnel in important positions of the Company violate these procedures, they shall be dealt with accordingly in accordance with relevant provisions according to the seriousness of the violation.

3.10 If a supplier's personnel who is involved with the Company's economic activities violate the "Supplier Anti-Bribery/Anti-Corruption Commitment" or the anti-corruption and anti-bribery-related agreements signed by both parties, the qualification of such suppliers and service providers will be resolutely revoked. Should it constitute the crime of commercial bribery (offering bribers), the judicial authorities will hold such suppliers criminally responsible.

3.11 The Company encourages employees and business partners with business contacts to report and expose corruption, and all steps such as acceptance and investigation of reports must be kept strictly confidential. It is strictly forbidden to disclose the name, department, company name and other information of the informant; it is strictly forbidden to disclose the report to the person or department being reported on. When investigating and verifying the incidents, the original or copy of the reporting materials shall not be presented, the informant shall not be exposed, the handwriting of anonymous informant letters and materials shall not be identified, and the informant materials shall not be borrowed at will.

4. Appendix

Integrity Pledge

5. Document review

The document was reviewed on March 8, 2023.

6. Approval and issuance agency

Board of Directors of the Company

Integrity Pledge

To Chifeng Jilong Gold Mining Co., Ltd.:

Our company would like to establish a long-term cooperation relationship of mutual benefits and win-win results with your Company. We make the following pledges in order to ensure integrity in the process of procurement and prevent and curb the occurrence of violations of law and discipline from the source:

1. Do not give any items (including money, goods, shopping cards, marketable securities, free labor services, etc.) to your staff (including the spouses, children and relatives of the staff, etc., the same below).

2. Do not offer to your staff abnormal business banquets, networking activities, vacations, tours and commercial entertainment activities (including karaoke bars, nightclubs, saunas, massages, golf, etc.).

3. Do not arrange work for your staff and their families, or pay any kind of expenses (including residential renovation, wedding and funeral, shopping, tuition, children studying abroad, etc.) that should be borne by themselves.

4. Timely reminder obligation: If it is found that your staff has a tendency to violate this commitment, they will be promptly reminded to make corrections and such tendencies will be reported to your supervision department. We will actively cooperate with you over your investigation (tipoff email of your Company: grievance@cfgold.com).

5. If it is confirmed that there is a violation of the above commitments, you have the right to take measures such as intra-group notification, inclusion in the supplier blacklist, termination of procurement cooperation, and investigation of relevant civil, administrative and criminal liabilities.

6. “You (the Company)” refers to Chifeng Jilong Gold Mining Co., Ltd. and its affiliates.

7. This pledge forms an integral part of all contracts signed between us and you, and if otherwise agreed in the contract, the contractual provisions shall prevail.

8. Once a pledge has been made, it will remain valid all the time.

Pledged by (official seal):

Legal representative (signature):

Date: