



September 2025

# Tin Fung Jewellery Ltd.

Ethical Business Policy Document



Management Policy Document  
CONTROLLED COPY

# Tin Fung Jewellery Limited

Policy Document	Policies	Rev. No. 03
		Date: 01-09-2025
Doc. No.MPD-001		

## DOCUMENT APPROVAL

This Policy Document (MPD-001) applies to Hong Kong and China operations and scope of material is Gold/Silver jewellery. This document is to define rules and regulations and way of working for the operations and activities of the company in relation to the requirements of Responsible Jewellery council and ethical business practice.

The contents of this document have been reviewed and approved by Management and subject to annual review.

All employees of Tin Fung Jewellery Limited are required to be familiar with this document and follow the risk mitigating measures identified in this document.

Management is responsible for making changes / revisions to this document and all employees are advised to bring to my attention any issues concerning this document.

### Policy on Corporate social Responsibility

While we run our business based on the expectations of our diverse stakeholders, we also understand the importance of contributing to making the world a better place. At *company*, we strongly believe in the concept wherein the company contributes to building economic, social and environmental imperatives.

Corporate Social Responsibility (CSR) aims to contribute to societal goals of a philanthropic, activist or charitable nature or by engaging in or support volunteering or ethically oriented practices.

Our CSR Policy aims to the betterment of a sustainable society and this commitment is ingrained in our core values. We aim to demonstrate these through our actions governed by the CSR policy. This policy applies to our Company and its all activities and may also refer to our suppliers and partners.

### Policy on Environment/Social and Governance

#### Business Ethics and Transparency

- We will conduct our operations in an open, honest and ethical manner.
- We will ensure that all our operations are legitimate.
- We undertake to keep every partnership and collaboration open and transparent.

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- We recognise the importance of protecting all our human, financial, physical, informational, social, environmental and reputational assets
- We will advise our partners, contractors and suppliers of our CSR Policy and will work with them to achieve consistency with the policy

## Environment Health And Safety

We are committed to provide a safe and healthy work environment and will not compromise the safety of any individual.

We recognise that environmental pollution prevention, biodiversity and resource conservation are key to a sustainable environment and will integrate the same into our business practices.

All employees and contractors are responsible and accountable for contributing to a safe working environment, for fostering safe working attitudes and for operating in an environmentally responsible manner.

## Governance

Tin Fung Jewellery Limited will undertake its CSR activities as approved by the CSR Committee, through a registered trust or society. The Company will assist the CSR Committee to identify the areas of CSR activities, programs and execution of initiatives as per the guidelines defined. The surplus funds if any arising out of the CSR activities will not form part of the business profit of the Company. The surplus funds will be used in the development of CSR projects in the following year. It will be mandatory for (Tin Fung Jewellery Limited) to disclose its CSR Policy, programs/projects undertaken, and the expenditure made towards CSR activity. Following activities shall be carries out in 2025/2026;

- Skill development program for girls (Jewellery Manufacturing)
- Education for Girl Child

## Whistle-Blower Policy

The company has a set policy and Procedure document and firmly believes that it should be implemented in a true spirit with the involvement of all stake holders. Further, the company shall always involve all stake holder in the process of continues improvement and welcome reporting of any incident or observation of breach of policy and procedure from any third party of stake holder. At the same time company shall always believe that any person who reports the breach incident or observed any violation of policy should be provided adequate immunity

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against any adverse impact on his job or any threat to his/her life or any form of harassment and torture.

The company shall always maintain the confidentiality of the whistle blower and shall not disclose identity of the whistle blower without written consent from the whistle blower. The company shall always ensure that the person who has reported incident of violation for policy and procedure shall not be penalized or harassed or tortured or threaten by any individual. The company shall take action in 15 working days.

Business policies of the company assure that all employees or third party who comes forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation.

Against any such individuals, assuming they have not been involved in the violation will not be tolerated.

- a. Company encourages employees or any third party to voice concerns promptly, if they have a genuine reason to believe that a policy, company operation or practice is or will likely be in violation of any law, regulation or internal company rule or policy, including this. In case of any incident with the Whistle-Blower he/she can report to entity head and external lawyer on following mail id's.

Mr. Jacky (Director) : 'jacky@tfj.com.hk'

## Comments, Enquiries and Complaints

Enquiry Hotline:	2717 1771 (handled by "1823")
E-mail:	<a href="mailto:enquiry@labour.gov.hk">enquiry@labour.gov.hk</a>
Fax:	2544 3271
By Post:	The Commissioner for Labour, Labour Department 16/F, Harbour Building, 38 Pier Road, Central Hong Kong

### Contact information

- Website: [www.mohrss.gov.cn/](http://www.mohrss.gov.cn/) Phone: 86-10-84201116
- Email: [wzzb@mohrss.gov.cn](mailto:wzzb@mohrss.gov.cn)

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## Drug and Alcohol Policy

### INTRODUCTION

Drug and Alcohol is a known health hazard. The following policy has been adopted by **Tin Fung Jewellery Limited**. to take all possible steps to protect employees from drug and alcohol exposure and to comply with legislative requirements.

### THE POLICY

Consumption Alcohol and Schedule X (Narcotics) drug is prohibited in Tin Fung Jewellery Limited's premises and on the surrounding grounds, including the car park. This applies to employees whether employed directly by Tin Fung Jewellery Limited., through an agency, by a contractor or other organization, and visitors.

No one must drink alcohol or use drugs at this workplace, except:

For legitimate medical reasons: You must notify your supervisor if prescribed medication is likely to affect your behavior and therefore work health and safety. Your supervisor may assign you other duties while you're taking the medication.

At workplace-based social events: This is dealt with in more detail under Social events in this policy.

The manager/supervisor at this workplace must, if they have reasonable grounds for believing that you are incapable of safely performing your duties or may be a risk to others due to the effects of drugs or alcohol, arrange for you to be removed safely from the workplace.

Each person must ensure that they are not, by the consumption of drugs or alcohol, in such a condition as to endanger their own safety or that of others at this workplace.

This includes not coming to work if, after drinking or using drugs in your social time, your ability to work safely is still impaired. If you come to work, you must report to your supervisor, who may assign you other duties or arrange for you to be removed safely from the workplace.

### DISCIPLINARY ACTION

If anyone is found to breach this policy, management will give formal warning, followed by suspension, and finally, dismissal.

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## SOCIAL EVENTS

Responsible social events can be held at this workplace. To ensure everyone remains safe:

Everyone is expected to act responsibly

Non-alcoholic drinks and food will be provided

## SMOKING POLICY

### INTRODUCTION

Secondhand (passive) smoke is a known health hazard. The following policy has been adopted by Tin Fung Jewellery Limited. to take all possible steps to protect employees from secondhand (passive) smoke exposure and to comply with legislative requirements.

### THE POLICY

Smoking is prohibited in Tin Fung Jewellery Limited's premises and on the surrounding grounds, including the car park. This applies to employees whether employed directly by Tin Fung Jewellery Limited through an agency, by a contractor or other organization, and visitors.

Employees are also restricted to smoke may do so in their own time during lunch breaks. Employees will not be permitted to smoke whilst carrying out their duties and responsibilities for Tin Fung Jewellery Limited.

### IMPLEMENTATION AND ENFORCEMENT OF THE POLICY

Managers will be responsible for the promotion and maintenance of the policy by their staff. Managers will receive training and guidance regarding their responsibilities in relation to the policy and enforcement of it.

Employees should inform the appropriate manager of anyone who fails to comply with the policy.

Employees not complying with the policy will be referred to their manager for support subject to the usual disciplinary procedure.

Visitors not adhering to the policy will be asked to comply or leave the premises or site.

All job applicants will be made aware of the policy via display of copy of policy in respective departments, where a requirement to abide by it will be part of the person specification. Applicants will be reminded of the policy at interview stage.

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The policy will be explained to new employees during induction Training and guidance on enforcing the policy will from part of new managers' induction process.

## SUPPORT FOR THOSE WHO SMOKE

Tin Fung Jewellery Limited. recognizes that smoking is an addiction and that the smoking policy will impact on smokers' working lives. Tin Fung Jewellery Limited. wishes to support employees who want to stop and help individuals adjust to this change. Tin Fung Jewellery Limited. will give each employee, who smokes, and wishes to stop, four hours paid time off to seek professional help from the local NHS Stop Smoking Service, their GP or other recognized method of smoking cessation.

## Diversity, Equity and Inclusion Policy

Tin Fung Jewellery Limited is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion.

Whole structure of the company comprised of management with different experience, skills and capabilities. Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

Tin Fung Jewellery Limited. diversity initiatives are applicable—but not limited—to our practices and policies on cross cultural activities and development, skill enhancing programmes, recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

The company has hired external experts who can support employees in enhancing required knowledge to perform task

Addressing financial need over and above remuneration (including medical expense, educational loans and accommodation supports)

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All employees will be supported in the development of their skills to help maximize their potential.

Bullying, harassment, and all forms of discrimination (direct or indirect) will be prohibited.

Every report of discrimination and harassment will be taken seriously and acted upon.

Togetherness and Respectful communication and cooperation between all employees.

Teamwork and employee participation, permitting the representation of all groups and employee perspectives.

Work/life balance through flexible work schedules to accommodate employees' varying needs.

Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

We follow zero shouting work culture "No Yelling"

All employees of Tin Fung Jewellery Limited. have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfil this responsibility.

Any employee found to have exhibited any inappropriate conduct or behaviour against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy and initiatives should seek assistance from a supervisor or an HR representative.

Management responsibility

Management responsibilities for the policy may include:

Regularly review the benefits, terms, and conditions of employment to ensure they are equal and not discriminatory

Ensure no employees is discriminated against or harassed because of the discrimination Provide training to all employees on their role in preventing discrimination in the workplace

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## Policy Statement of Child Labour

- a. No form of child labour should be employed at *Tin Fung Jewellery Limited*
- b. The minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).
- c. For authorized adolescents (persons below 18 years of age but above 15 years), the entity management is responsible for providing working conditions, hours of work and wages in compliance with applicable local laws as a minimum.
- d. If a child is found working at *Tin Fung Jewellery Limited* either own or subcontracted, the responsibility of rehabilitation will be undertaken by the management.
- e. The above policies will also be applicable to all business partners.

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## Policy Statement of Forced Labour

The policies relating to this section are part of the Business Policies adopted by *Tin Fung Jewellery Limited* and are presented below for reference:

- a. The management of *Tin Fung Jewellery Limited* are fully committed to ensuring that forced or involuntary, bonded, indentured or prison labour, is not practiced nor used in any form at any of its facilities. *Tin Fung Jewellery Limited* shall ensure that there is no restriction in the freedom of movement of employees and dependents. Any reported incidents relating to forced labour will be considered as a serious violation of the Business Policies.
- b. The following definitions will be applicable:
  - The Universal Declaration of Human Rights that states that '*No one shall be held in slavery or servitude*'

ILO Convention 29, which defines forced or compulsory labour as '*all work or service which is extracted from any person under the menace of any penalty, and for which the said person has not offered himself voluntarily*'"

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## Policy Statement General Employment, Working hours, Remuneration

- a. *Tin Fung Jewellery Limited* complies with applicable national laws / regulations with respect to employment.
- b. *Tin Fung Jewellery Limited* is committed to maintaining appropriate records as stipulated by the regulatory authorities for all staff employed, whether on a full time, part time or seasonal basis.
- c. *Tin Fung Jewellery Limited* shall not require workers to work for more than the national limit of hours in a week on a regular basis, with overtime hours not to exceed the national permitted limit per week on a regular basis unless there are legal opt-outs.
- d. *Tin Fung Jewellery Limited* shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards and shall be sufficient to meet the basic needs of workers.
- e. Wages shall be paid to employees on a regular and predetermined basis in a manner and location convenient to employees, accompanied by a wage slip detailing wage rates, benefits and deductions as applicable.
- f. *Tin Fung Jewellery Limited* shall ensure that due process of wage deductions shall be followed where applicable and it shall not be binding on employees to buy provisions from the group.
- g. When required, due recognition will be given to the existence, membership and lawful activities of worker representative bodies, and worker representatives will be given access to carry out their responsibilities / functions.
- h. *Tin Fung Jewellery Limited* is committed to addressing the legitimate grievances of its employees.
- i. *Tin Fung Jewellery Limited* shall follow proper procedure as per law for dismissal of employees, in case the need for the same arises, and arbitrary dismissal procedures shall be avoided.
- j. Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees.
- k. *Tin Fung Jewellery Limited* is fully committed to the pursuance of the provision of fair and conducive employment conditions, consistent with applicable laws and regulations.

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## **Policy Statement Money Laundering and Finance of terrorism**

The policies relating to this section are part of the Business Policies adopted by Tin Fung Jewellery Limited is presented below for reference:

- a. Tin Fung Jewellery Limited recognizes the fact that entities in the gems and jewelry sector have to take on the onus of analyzing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.
- b. Strict compliance is required at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- c. Tin Fung Jewellery Limited shall act in accordance with national laws and national / international accounting standards with respect to maintaining financial accounts of all business transactions and auditing of its financial accounts.
- d. Tin Fung Jewellery Limited ensures that concerned employees know and understand the relevant regulatory jurisdiction for national and international transactions, money laundering / financial offences related legal, regulatory and internal requirements as they apply to their jobs. Ignoring or not reporting suspicious activity that appears to be questionable may also be considered as a violation of the Business Policies, depending on the seriousness of the non-conformance.
- e. Tin Fung Jewellery Limited implements a “Know your Customer” and “Know your Supplier” procedure that establishes the identity of all organizations with which it deals, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.
- f. Know Your Counterparty and due diligence policy

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- g. "Know Your Counterparty" (KYC) is the overarching process of identifying and verifying the identity of organizations or individuals you do business with to assess potential risks, primarily to prevent financial crimes like
- h. **money laundering, bribery, corruption, and terrorist financing.** The **due diligence policy** outlines the specific procedures and measures a company takes to implement these checks.
- i. **Know Your Counterparty (KYC)**
- j. KYC is the first step and a fundamental component of an effective Anti-Money Laundering (AML) program. The primary goal is to ensure a clear understanding of business relationships and to be able to identify and react to suspicious or unusual transactions.
- k. Key aspects of KYC include:
  - l. **Identity Verification:** Collecting and verifying basic information such as legal names, addresses, business licenses, and government-issued identification documents.
  - m. **Understanding the Business Relationship:** Gaining insight into the counterparty's business activities, the purpose of the relationship, and expected transaction patterns.
  - n. **Beneficial Ownership Confirmation:** Identifying and verifying the ultimate beneficial owner(s) (UBOs)—the person or people who ultimately own or control the counterparty entity.
- o. **Due Diligence Policy**
- p. The due diligence policy is a broader framework that operationalizes KYC and involves a structured, risk-based approach to gathering and analyzing information about a third party. This process goes beyond basic identification and involves different levels of scrutiny based on the assessed risk.
- q. The core elements of a robust due diligence policy generally include:
- r. **Risk Assessment and Management:** Defining the specific risks (e.g., financial, operational, reputational, regulatory, ESG) associated with a

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counterparty and determining the appropriate level of due diligence required.

- s. **Customer Due Diligence (CDD):** The standard, ongoing process of gathering and analyzing customer information to build a risk profile. For low-risk customers, this may involve basic, periodic reviews (Simplified Due Diligence - SDD). For medium and high-risk counterparties, a more thorough process is applied (Enhanced Due Diligence - EDD).
- t. **Enhanced Due Diligence (EDD):** Applied to high-risk situations (e.g., politically exposed persons (PEPs), complex ownership structures, or transactions involving high-risk jurisdictions or products). EDD involves deeper background checks, media intelligence searches, and analysis of source of funds/wealth.
- u. **Ongoing Monitoring:** Continuously monitoring the counterparty's transactions and activities for any patterns that appear unusual or suspicious relative to their established profile. This ensures that information remains accurate and reliable over the course of the business relationship.
- v. **Record-Keeping and Documentation:** Maintaining detailed records of all collected information, risk assessments, findings, and decisions. This creates an audit-ready trail to demonstrate compliance with regulatory requirements.
- w. **Internal Controls and Reporting:** Establishing a clear internal reporting process for any suspicious activities or red flags, with oversight from senior management or a designated compliance officer.
- x. Implementing an effective KYC and due diligence policy is crucial for protecting a business from financial and reputational damage and for ensuring compliance with international standards set by bodies like the [Financial Action Task Force \(FATF\)](#).

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## Policy Statement of Freedom of association and Collective Bargaining, Discrimination and Discipline and Grievance Procedures

The policies relating to this section are part of the Business Policies adopted by *Tin Fung Jewellery Limited* and are presented below for reference:

- a. *Tin Fung Jewellery Limited* will not prevent employees from associating and collective bargaining
- b. Discrimination can mean distinction, exclusion or preference.
- c. Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, ethnicity, caste, national origin, religion, age, disability, gender, marital status, physical appearance, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful is strongly discouraged by *Tin Fung Jewellery Limited* and any such reported incidents will be viewed as a serious violation of this Business Policies.
- d. *Tin Fung Jewellery Limited* will ensure that employees who have certain life threatening diseases or illnesses are not treated differently from other employees, and will continue to employ such personnel, as long as they are physically and mentally fit to attend to their normal job responsibilities.
- e. Individuals who are “Fit for Work” shall be accorded equal opportunities and shall not be discriminated against on the basis of factors unrelated to their ability to perform their job.
- f. *Tin Fung Jewellery Limited* shall not use corporal punishment under any circumstances and will ensure that employees are not subjected to harsh or degrading treatment, sexual or physical harassment or other forms of mental or physical coercion, abuse or intimidation.
- g. *Tin Fung Jewellery Limited* encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, entity operation or practice is or will likely be in violation of any law, regulation or internal entity rule or policy, including this Business Policies. *Tin Fung Jewellery Limited* assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation against any such individuals, assuming they have not been involved in the violation, will not be tolerated.

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## Policy Statement of Product Integrity

- a. *Tin Fung Jewellery Limited* is committed to complying with relevant trading standard legislation and specific national and local regulations applicable to its products.
- b. The following essential Policies will be applicable in all transactions of *Tin Fung Jewellery Limited* involving diamonds, treated diamonds, synthetics and stimulant
  - **Disclosure** - *Tin Fung Jewellery Limited* shall fully and accurately disclose the material characteristic of their products. All reasonable efforts shall be made to properly disclose all relevant information on the physical characteristics, such as mass/weight, cut, cut, colour, clarity or fineness, of a diamond or gold jewellery product.
  - **Misrepresentation** - No untruthful, misleading or deceptive statement, “representation” or material omission in the “selling”, “advertising” or distribution of any metal or any gold product, shall be made by the Group and its entities in any medium, including the internet
  - **Quality** - The weight, colour, purity of gold/silver and other metal jewellery will be described in accordance with the recognized guidelines appropriate to the particular jurisdiction.
  - Full disclosure i.e. the complete and total release of all available information about a jewellery and all material steps it has undergone prior to sale to the purchaser, irrespective of whether or not the information is specifically requested and regardless of the effect on the value of the diamond.
  - No misuse of terminology or misrepresentations or attempts to disguise the product will be made in the selling, advertising and distribution of any metal or jewellery.



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## Policy Statement Product Security

- a. Tin Fung Jewellery Limited is committed to establish and implement product security measures within the premises and during shipments to protect against product theft, damage or substitution.
- b. The security and well being of employees, visitors and other relevant business partners is prioritized when establishing product security measures.

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## Disclosure of Metals and Jewellery Policy Statement

The policies relating to this section are part of the Business Principles adopted by Tin Fung Jewellery Limited. and are presented below for reference:

The following essential principles will be applicable in all the entity's transactions involving metals and jewellery.

- Full disclosure i.e. the complete and total release of all available information about a metals and all material steps it has undergone prior to sale to the purchaser, irrespective of whether or not the information is specifically requested and regardless of the effect on the value of the metal or jewellery.
- Full disclosure to the purchaser will take place when offered for sale, such that
  - Full verbal disclosure will clearly take place during sale.
  - Full written disclosure will be conspicuously included on each bill of sale or receipt in plain language and readily understandable to the purchaser. Written disclosure will normally be in English language
- No misuse of terminology or mis-representations or attempts to disguise the product will be made in the selling, advertising and distribution of metals and jewellery.
- The word 'diamond' will not be used in the case of names of firms, manufactures or trademarks; in connection with metals or jewellery."

**Tin Fung Jewellery Limited** has adopted the industry standard for all metal jewellery including gold jewellery.

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## Policy Statement Bribery and Facilitation Payments

The policies relating to this section are part of the Business Policies adopted by Tin Fung Jewellery Limited and are presented below for reference:

- a. Tin Fung Jewellery Limited *is* committed to prohibit bribery in all business practices and transactions that are carried out by the company or on its behalf by business partners. The company will not offer, accept or countenance any payments, gifts in kind, hospitality, expenses or promises as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person; to influence the course of the business or governmental decision – making process.
- b. Tin Fung Jewellery Limited considers Bribery Risk as it applies to its organization (including agents) to identify which areas pose high risks. Tin Fung Jewellery Limited has developed appropriate methods to monitor conduct of employees and agents and eliminate bribery based on this understanding.
- c. The management of Tin Fung Jewellery Limited facilitates the reporting of incidences of attempted bribery or inappropriate gifts within their organization and shall apply appropriate sanctions for bribery and attempted bribery in all forms.
- d. Tin Fung Jewellery Limited ensures that no employee will suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or *facilitation* payment even if this action may result in the enterprise losing business.

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## **Policy Statement Community Engagement and Development**

- The policies relating to this section are part of the Business Policies adopted by *Tin Fung Jewellery Limited* and are presented below for reference:
- Tin Fung Jewellery Limited is committed to the development of communities where it operates, contributing to their social and economic welfare.

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## **Policy Statement Environmental protection, Use of Energy and natural resources**

The policies relating to this section are part of the Business Policies adopted by Tin Fung Jewellery Limited and are presented below for reference:

Tin Fung Jewellery Limited is committed to effective environmental performance and will focus on the following initiatives:

- Conduct business in an environmentally responsible manner.
- Compliance with all applicable environmental laws and regulations
- The impact of our operations on the environment will be assessed and reviewed periodically to mitigate or eliminate such impact.
- Disposal procedures for waste generated will be clearly defined and practiced in line with standards that are set by law.
- Improvement of employee environmental awareness and performance through training.
- Efficient use of energy and natural resources to minimize waste generation through efforts that include recycling and prevention of pollution.
- Commitment to a continual improvement process in environmental management

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## Policy Statement Health and Safety

The policies relating to this section are part of the Business Policies adopted by *Tin Fung Jewellery Limited* and are presented below for reference:

*Tin Fung Jewellery Limited* recognizes the need to develop a sustainable, value creating business and is committed to the following in the areas of workplace health and safety:

- Providing safe and healthy working conditions for all employees in accordance with applicable law and other relevant industry standards.
- Any adverse impact of our business processes on those who carry it out shall be identified and eliminated. Towards this end, we will systematically review our operations to identify sources of health and safety related risks.
- We will provide adequate and appropriate labeling and storage of all chemicals and cleaning materials and adopt methods to protect employees from exposure to airborne particles and chemical fumes
- Our review of our processes will use appropriate standards as required by prevailing laws, expert opinion, feedback from workers and our knowledge of best practices. The review will lead to formulation of clearly described work practices and safety drills and appropriate safeguards and isolation from mobile equipment. All our staff will be trained in the manner required to adhere to these work practices and drills.
- Workers shall not be under the influence of or abusing, drugs, alcohol and/ or other illegal substances.
- We will seek to substitute the use of material, which are known to cause an adverse impact on the health of workers or health of consumers in the course of its use.
- All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable.
- We will take adequate measures to safeguard our employees from fire and other workplace injuries.

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- All products sold by *Tin Fung Jewellery Limited* to consumers shall comply to applicable regulations of product health and safety.

## Policy Statement of Human Rights

The policies relating to this section are part of the Business Policies adopted by *Tin Fung Jewellery Limited* and are presented below for reference:

- All employees in *Tin Fung Jewellery Limited* will be treated with equality, respect and dignity.
- Tin Fung Jewellery Limited* believes in and respects the fundamental human rights according to the United Nations Universal Declaration of Human Rights.
- Tin Fung Jewellery Limited* will not interfere in the right of employees to observe tenets or practices based on caste, race, national origin, gender, religion, disability, union membership, or political affiliation
- Tin Fung Jewellery Limited* strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
- Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the Group.
- Security personnel, if employed by *Tin Fung Jewellery Limited* are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.
- Wherever the any violation of human rights are observed, the company shall take mitigation action and if needed hire an external non-governmental organization for the implementation.
- Human rights risk assessment shall be done annually covering internal and external stakeholders.

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- i) The company shall conduct human right risk assessment and upon any violation observed internal or external stake holders, company shall develop and implement risk mitigation plan according to severity of incident. The company may seek assistance from external NGO's or experts to develop and implement mitigation plan and monitoring.
- j) The company shall provide support and consultation to external stakeholders upon written request by the business partners.



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## Policy Statement Use of Security Personnel

The policies relating to this section are part of the Business Policies adopted by Tin Fung Jewellery Limited and are presented below for reference:

*Security personnel, if employed by Tin Fung Jewellery Limited are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.*

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## Policy – Supply Chain and Ethical Sourcing

At Tin Fung Jewellery Limited, we take Ethical business practice, social and environmental factors into consideration in making decisions on the procurement of Gold/Silver/Platinum including all. This Policy shows company's commitment and its expectations for its product suppliers regarding actions to address Conflict metals.

Tin Fung Jewellery Limited expects its suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that gold/Silver/Platinum or any precious/semi precious metals supplied to us containing conflict free metals are not belongs to Conflict-affected and high-risk areas – CAHRAs. We request our suppliers not to supply any material that is subject to EU. Reg. 833/2014.

We being a responsible company, Tin Fung Jewellery Limited supports the goal of the OECD of preventing armed groups in the conflict affected and high risk countries from benefitting from the sourcing of Conflict metals from that region.

Tin Fung Jewellery Limited is committed to working with its suppliers to educate them on these matters and concerning steps they can take to obtain increased transparency regarding the origin of metals mined or manufacture and sell to Tin Fung Jewellery Limited. Tin Fung Jewellery Limited reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.

Tin Fung Jewellery Limited reserves the right to request additional documentation from its suppliers regarding the origin/source of metals sold to Tin Fung Jewellery Limited. Suppliers who do not reasonably comply with this Policy shall be reviewed by Tin Fung Jewellery Limited 's for future business.

Tin Fung Jewellery Limited is committed to ensuring that our supply chain is free of any metals which was procured for the support or benefit of armed and anti-social conflict groups or involving serious abuses of human rights and non-compliant with OECD Guidelines.

Tin Fung Jewellery Limited clearly criticizes such activity and will reject any material which we believe was obtained involving serious human rights violations or which benefitted or supported armed rebels or terrorist groups through illegal finance or other activities.

The company shall carry out risk assessment for its supply chain and shall not enter into any business relationship or if may require then shall suspend/discontinue the engagement with any such supplier involved in dealing with Conflict-Affected and High-Risk areas, Any form of Human Right Violation; Torture, Cruel, In-Human and Degrading Treatment; Forced/Compulsory Labour; Child Labour; Abuses such as widespread Sexual Violence; War Crimes; other serious violations

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of International Humanitarian Law, Crime against Humanity; Genocide and/or To Bribe or To be Bribed. We strictly condemn and prohibit any Direct/Indirect support to public/private security forces which illegally Control, Tax or Extort money from Mining Sites, Transportation Routes and Upstream Sectors.

The Company shall carry out due diligence to assess risks related to procurement from the Conflict-affected and high-risk areas – CAHRAs and shall always source from compliant miners/traders.

We shall always set reasonable efforts to source metals from recycled source and traders validated as being Conflict Free and require their direct and indirect suppliers to do the same; We strive to work supportively with our customers and supply chain partners in implementing conflict free compliance programs for metals/jewellery Supply chain.

## **Policy – Due Diligence and Risk Assessment**

The company shall always undertake to ensure that the extraction and trade of metals support peace and development, not conflict.

Tin Fung Jewellery Limited remains committed to enhance its Supply Chain Due Diligence program through internal review and external assessments. We have zero tolerance policy for the supplier violating OECD due diligence guideline and we shall immediately stop commercial relationship if any of our business associates found non-compliant or High-Risk during our internal/external risk assessment.

All the suppliers are also requested to carry our risk assessment and due diligence for their suppliers and products they are sourcing.

Currently Tin Fung Jewellery Limited procure it's metals from RJC CoP/CoC Ethical business practice compliant miners/traders. However, we have established a strong due diligence process and we shall review it as an when we observed significant risk or upon receipt of any grievance or complaint but in normal course, we shall carry our due diligence process on annual basis.

## **Identify red-flags and Risk**

The company has checked transaction methods and name and individuals of company on SDN list of USA treasury and EU sanction list. All the suppliers are found low in risk and in compliance with OECD requirement of CAHRA's.

## **Risk mitigation plan**

- ✓ Company shall always deal with legitimate company.
- ✓ Always complete due diligence and risk assessment before establishing commercial relationships.
- ✓ Make sure that do transaction shall be carried out with business sense.
- ✓ Immediately stop commercial relationship upon any violation observed an report to concerned internal and external reporting authority.
- ✓ Continuously monitor suspicious transactions and red flag records
- ✓ Communication and awareness to suppliers

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Supplier Risk Assessment /Due Diligence Report – Publication (Detailed report is with Compliance team and may produce to concerned parties upon request)

## **Risk Assessment – Report Summery**

The Company has carried our RJC CoP and CoC compliance review and found compliance with all Code of practice and chain of custody requirements. The compliance office of the company has carried out risk assessments in context of OECD guidelines and for all its suppliers. The company has made aware all its suppliers aware of ethical supply chain practice and OECD requirements. Upon verification of information provided by all our suppliers and information available in public domain, we have verified the existence of risk of violation of OECD guidelines. We found all our suppliers are involved with legitimate business practices, not involved with any activity that violates OECD requirements. A detailed compliance report and all suppliers’ due diligence and assessment report are available from the senior management of the company.

Sr#	Description	Information
1	% Of legitimate register company supplying material	100% suppliers are legitimate registered company.
2	Illegally control mine sites or otherwise control transportation routes, points where gold is traded and upstream actors in the supply chain;	No. The company deals with legitimate business partners complying with law of land.
	Illegally tax or extort money or gold at points of access to mine sites, along transportation routes or at points where gold is traded	Ensure compliance
	Illegally tax or extort intermediaries, export companies or international traders.	No such Business partners
3	Any supplier found violating any OECD requirement on due diligence and risk assessment?	No. Suppliers found compliance and low risk suppliers.
4	Any supplier involved with any armed forces or human right violation or ASM?	Not observed.
5	Is any individuals or companies blacklisted by SDN list of USA Treasury or EU sanctions?	No. No such red flag observed
6	Any suppliers found violation ethical business and sourcing policy?	No
7	Have you identified any suppliers involved in dealing with conflict minerals and metals?	No suppliers involved in dealing with conflict metals.
8	Any area or location or individual or company related red-flag observed?	No
9	Overall risk of Suppliers	Due diligence/risk assessment, all suppliers found low risk.

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