國浩律師（上海）事務所
GRANDALL LAW FIRM (SHANGHAI)

968 23-25 27 200041

23-25&27th Floor, Garden Square, No. 968 West Beijing Road, Shanghai 200041, China

/Tel: +86 21 5234 1668 /Fax: +86 21 5234 1670

/Website: http://www.grandall.com.cn

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200041

+86 21 5234 1668

+86 21 5234 1670

zhaowei@grandall.com.cn

jiangjiana@grandall.com.cn

wanghaosh@grandall.com.cn

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440400000015734 7,500

1		3,200.00	42.67%
2		1,450.00	19.33%
3		800.00	10.67%
4		450.00	6.00%
5		399.00	5.32%
6		223.50	2.98%
7		192.75	2.57%
8		162.75	2.17%
9		150.00	2.00%
10		105.00	1.40%
11		54.00	0.72%
12		50.00	0.67%
13		50.00	0.67%
14		49.50	0.66%
15		42.00	0.56%
16		35.00	0.47%
17		33.00	0.44%

18		20.00	0.27%
19		15.00	0.20%
20		10.00	0.13%
21		6.00	0.08%
22		2.50	0.03%
		7,500.00	**100.00%**

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1		3,200.00	42.67%
2		1,450.00	19.33%
3		800.00	10.67%
4		450.00	6.00%
5		399.00	5.32%
6		223.50	2.98%
7		192.75	2.57%
8		162.75	2.17%
9		150.00	2.00%
10		105.00	1.40%
11		54.00	0.72%
12		50.00	0.67%
13		50.00	0.67%
14		49.50	0.66%
15		42.00	0.56%

16		35.00	0.47%
17		33.00	0.44%
18		20.00	0.27%
19		15.00	0.20%
20		10.00	0.13%
21		6.00	0.08%
22		2.50	0.03%
		7,500.00	**100.00%**

2023 3 31

1		51,999,959.00	26.00%
2		5612200.00	2.81%
3		4609714.00	2.30%
4		4118800.00	2.06%
5		3747900.00	1.87%
6		3220800.00	1.61%
7		2761200.00	1.38%
8		2516500.00	1.26%
9		2450100.00	1.23%
10		2244148.00	1.12%
		83,281,321.00	**41.64%**

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	91440300788336625X	100,000
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*** 4405271975********

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1		82.50	55.00%
2		67.50	45.00%
		150.00	**100.00%**

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1		3,200.00	32.00%
2	21	4,300.00	43.00%
3		2500.00	25.00%
		10,000.00	**100.00%**

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1			WH [2022]0011	2025.3.14	
2			44042300062	2026.1.12	
3			91440400753665189U001R	2025.12.21	
4			GR202144012888	2024.12.30	

5 IS045001 2018

			4		
12		IS045001 2018	CN21/31882.02	2024.11.4	SGS United Kingdom Ltd
13		ISO14001 2015	CN04/63300.04	2025.11.11	SGS United Kingdom Ltd
14			AQBWH202200011	2025.1	
15			11010519704-00001	/	

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1		33.2% 33.2%
2		60%
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4		40% 60%
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3		70%
4		20.4%

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		2023 1-3		2022	
		-	-	-	-
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		-	-	43.14	0.14%

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	5,500	2022/11/24	2023/11/24	
	5,500	2021/12/1	2022/12/1	
	5,500	2021/3/23	2022/3/23	
	5,500	2020/3/26	2021/3/26	

	3,000	2019/5/9	2020/5/9	
	2,500	2019/4/24	2020/4/24	
2-				
	6,700	2022/11/24	2023/11/24	
	7,300	2022/6/22	2023/6/22	
	6,700	2021/12/2	2022/12/2	

	70%		100%	2020 302	4,020.42	4,020.42		2020 10 20 2020 11 6 2020

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2015 2016 3.64

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2023 3 31 12,726.21

3,977.83

	2023 1-3	2022	2021	2020
	85.74	342.97	342.97	616.15
	36.75	146.99	146.99	264.07
	-	-	-	82.33
	122.49	**489.96**	**489.96**	**962.55**

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	2023.3.31		2022.12.31	
	48.74	14.62	48.74	14.62

	2023.3.31		2022.12.31	
	2021.12.31		2020.12.31	
	48.74	4.87	48.74	2.44

2

	2023.3.31	2022.12.31	2021.12.31	2020.12.31
	3,588.92	3,503.18	3,160.21	2,817.24
	1,538.11	1,501.36	1,354.38	1,207.39
	-	-	18.89	18.89
	5,127.03	**5,004.54**	**4,533.48**	**4,043.52**

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1				2442.16	1,567,896	2023.1.1-2023.12.31
2			1 1 A062	/	8,000	2022.6.1-2023.5.31
3			93 10 21 2501	95.49	220,000	2023.3.15-2024.3.14
4			20H	41.35	60,000	2023.4.1-2024.3.31

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1		7290403		2	2030.09.06		
2		3950482	乐通	2	2026.08.13		
3		3950483	ITP	2	2026.08.13		
4		1370511		2	2030.03.06		

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2023 3 31 25

1				2014107446441	2014.12.09
2				2013206750835	2013.10.30

3				2013206751096	2013.10.30
4				2013206751575	2013.10.30
5				2013206753509	2013.10.30
6				2007100266486	2007.01.30
7				2021231272953	2021.12.13
8				2021231295067	2021.12.13
9				2021231295103	2021.12.13
10				2020224601203	2020.10.30
11				2020224601472	2020.10.30
12				2020224601491	2020.10.30
13				2020224601862	2020.10.30
14				2020224664293	2020.10.30
15				2020224664306	2020.10.30
16				2020224664467	2020.10.30
17				2020224664486	2020.10.30
18				2013102927525	2013.07.12

2		100	( )	100%
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4			3%	
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6		70%	1.2% 12%	
7			3 /	
8			15% 20% 25%	

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	2023 1-3	2022	2021	2020
	-	-	0.15	11.67
	-	20.00	-	30.00
	-	-	2.85	9.20
	-	-	0.22	2.18
	-	0.45	0.20	17.76
	-	-	-	6.35
	-	-	2.27	3.66
2019	-	-	-	1.00
	-	-	8.00	-
	-	-	30.00	-
	-	-	6.61	-
	0.36	0.60	0.96	-
2021	-	9.67	-	-
	-	8.28	-	-
	-	3.72	-	-
	-	1.73	-	-
2021	-	4.75	-	-
	-	1.28	-	-
	0.15	-	-	-
	-	-	22.84	-
	3.97	-	-	-

	4.98	**50.47**	**74.10**	**81.83**

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	2021.10		[2021]086		4.5	

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1			204,864	2020 10 9 2020 0402 9056 1. 204,864 2. 204,864 2018 10 18 2464

2			12,128,842.93	2020 10 21 2020 0402 9513 12,128,842.93 12,128,842.93 2017 7 28 117,955
3			12,333,706.93	2021 12 2022 6

2023 3 31

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1			2,751.32	2022 8 15,429.26 4,955.46 2022 7 31 2023 1 30 2022 03 5824

第三节　签署页

（本页无正文，为《国浩律师（上海）事务所关于珠海市乐通化工股份有限公司向特定对象发行股票的法律意见书》之签署页）

本法律意见书于 2023 年 6 月 21 日出具，正本 3 份，无副本。

国浩律师（上海）事务所

负责人：　　经办律师：

徐　晨　　赵　威

蒋嘉娜

蒋嘉娜

王　浩

				/		
1		0100165077	9 4 3 702	68,673.56	42.31	
2		0100165078	9 4 3 703	68,673.56	42.31	
3		0100165189	9 4 3 608	68,673.56	55.25	
4		0100165175	9 4 3 605	68,673.56	53.98	
5		0100165176	9 4 3 704	68,673.56	40.76	
6		0100165177	9 4 3 706	68,673.56	65.05	
7		0100165178	9 4 3 606	68,673.56	65.05	
8		0100165179	9 4 3 607	68,673.56	65.05	
9		0100165180	9 4 3 707	68,673.56	65.05	
10		0100165182	9 4 3 705	68,673.56	53.98	
11		0100165185	9 4 3 602	68,673.56	42.31	
12		0100165187	9 4 3 603	68,673.56	42.31	
13		0100165188	9 4 3 601	68,673.56	40.76	
14		0100165075	9 4 3 701	68,673.56	40.76	
15		0100165074	9 4 3 708	68,673.56	55.25	
16		0100165076	9 4 3 604	68,673.56	40.76	
17		0300001948	1	75,176.41	3,634.3	
18		0300001947	2	75,176.41	3,654.5	
19		0300001944	5	75,176.41	3,731	
20		0300001945	6	75,176.41	3,731	
21				75,176.41	7,322.8	

				/		
		0300061615	3199 763B			
22		0300061617	3199 2	75,176.41	12,139.82	
23		0300061616	3199	75,176.41	12,273.9	
24		0300001946		75,176.41	498.29	
25		0300035261	3001	75,176.41	1,685.74	
26		0300035262	3001	75,176.41	705.24	
27		0300061614	3199 1	75,176.41	704.06	
28		C2862251		12,000.24	-	
29		C3262871		1,199.83	3,389.86	
30		0300061618	3199	12,000.24	9,410.92	
31		0300001949		75,176.41	-	
32		2016 0024952	32	14,173.00	7,531.68	
33		2015 000212	130034642 32	79,054.00	5,771.93	
34			130034643 32		5,341.36	
35			130034644 32		5,362.12	
36					5,339.84	