



关于广东星徽精密制造股份有限公司
向特定对象发行股票并在创业板上市的
法律意见书

	6001	11 12	5180017
11	12F, TaiPing Finance Tower, Yitian Road 6001, Futian District, ShenZhen, China		
	(Tel.) 86-755-88265288	(Fax.): 86-755-88265537	
	www.shujin.cn	info@shujin.cn	

.....	4
.....	4
.....	4
.....	6
.....	8
.....	8
.....	8
.....	9
.....	13
.....	13
.....	14
.....	14
.....	15
.....	16
.....	22
.....	29
.....	30
.....	31
.....	31
.....	32
.....	33
.....	34
.....	34
.....	36
.....	40

广东信达律师事务所

关于广东星徽精密制造股份有限公司
向特定对象发行股票并在创业板上市的
法律意见书

[2020] 015

31440000455766969W

150

1991			2003	11
		1994	1996	
1995				
SZ000636		SZ000733		SZ000707
SH600789		SZ002198		SZ002238
SZ002289		SZ002334		SZ002365
SZ002327		SZ002421		SZ300112
SZ002587	SZ002528		SZ002495	SZ002577
SZ300220		SZ300433		SZ300400
SZ300464		SH603936		
SZ000024				
0755	88265288	88265076		

0755 88265537

zhangjiong@shujin.cn

1996

2002

2003

2002

2005

2007

01298.HK

06828.HK

00482.HK

00776.HK

H80.SG

P82.SG

DC9.SG

SZ300448

SZ300464

SZ300791

□ □

0755 88265288

0755-88265797

0755 88265537

lilijiao@shujin.cn

2014

2015

□ □

0755 88265288

0755-88262351

0755 88265537

wanlimin@shujin.cn







2020 11 4

2020

2020

2020

2020

2020 11 20

2020

2020

2020

2020

2020

2020

2020

35

35

1

CAC

[2020]0505

2



2020

35 35

2020

20 80% 20 / 20 20 =

2020

2019 10 9

[2019]48230003

6

2020 9 30

1

2

3

4



2010

5%

5%

2020 9 30

N

2020 9 30

5%

97,783,935

/ 53,134,998 /

54.34%		3,0641,230	/	15,000,000
/				48.95%
	19,500,000	/	19,500,000	/
			100%	
		5%		
				2020 9
30	5%			

2020

2020

2020 1-9 5%

5%

2017 2018 2019 2020

2020

1

2020 9 30

2

5%

2020 9 30

5%

Sunvalley E-commerce HK Limited

2020 9 30

	2020 9 30	2020 9 30
	4,482,364	1.27%
Sunvalley E-commerce HK Limited	9,959,820	2.82%
	2,615,948	0.74%
	2,615,948	0.74%
	2,615,948	0.74%
	2,615,948	0.74%
	4,749,700	1.35%

4

1		100%
2		100%
3		100%
4		100%
5		89% 10%
6		100%
7	Starfire Electronic Technology S.r.l.	100%
8	Starfire Industrial Engineering S.r.l	Starfire Electronic Technology s.r.l. 100%

5

12

6 1 2 3 5

1 2 3 5

7

1 2 3 5 6

12

1-6

1	1	
2		30%
3		20%
4		
5		100%
6		20%
7		
8	C.M.I. Cerniere Meccaniche Industriali S.r.l	
9		5%
10		5%
11		5%
12		5%
13		5%
14		5%
15		5%
16		5%
17	Sunvalley International Development Limited BVI	5%
18		5%
19		5%
20		5%
21		5%
22		5%
23		5%

24		5%
25		5%
26		5%
27		5%
28		5%
29		5%
30		5%
31		5%
32		5%
33		5%
34		
35		
36		
37		
38		
39		
40		
41		
42		
43		

1 2017 1 2017 8
55% 2017 8 2019 12 40% 2019 12
2017 9
100% 2018 12 100%





2020 9 30

11

10

4-1-22

2020 9 30

1

194

2

2020 11 27

2020 11 27

844818

2020 11 20

2020 11 20

1210429

2020 11 10

2020 10 24

64

2020 10 24

2020 10 24

170144280 170144282

2020 10 23

2020 9 30

74

1

2020 11 20 McDermott Will&Emery Saca Precision Technology
S.r.l. and Donati S.r.l.- Donati 1

2020 11 17

()

2020 9 30

SKL

19

SKL

2020 10 2 GCA LAW PARTNERS LLP
STK 212

2020 10 2 AZ MORE
SVJ 2017 9 1

Softbank

HAWKS Softbank HAWKS

logo

1

2020 9 30

409

2							
2020	9	30					
	4						
2020	10	20					6
			1				
2020	9	30					
			3				
2020	11	20	McDermott Will&Emery		Saca Precision Technology		
S.r.l. and Donati S.r.l.-				Donati		1	1
2020	11	17				()	
			2020	9	30	SKL	78
2020	10	2	GCA LAW PARTNERS LLP				
			STK	1			
2020	10	1					ZBT
275						ZBT	
2020	10	2	AZ MORE				
SVJ							

1

2020 9 30

3

2

2020 9 30

67

2020 9 30

31

2020 11 17

()

2020 9 30

SKL

26

SKL

3

2020 10 2 GCA LAW PARTNERS LLP

STK 92

2020 10 1

ZBT

7

ZBT

2020 10 2 AZ MORE
SVJ 1

SVJ

2017

2018

2019

2020

2020 9 30

2020

2020 9 30

11

3

2020 9 30

12

1



13

1

8

4

2020	11	20	McDermott Will&Emery	Saca Precision Technology
S.r.l. and Donati S.r.l.-			Donati	

2020	10	2	GCA LAW PARTNERS LLP
STK			STK
			STK

2020	10	1		ZBT
			ZBT	ZBT

2020	10	2	AZ MORE
SVJ		2	SVJ



2020 1-9

/

2,500

2,500

2020 11 17

()

SKL Jaddaf Telecom

Est.

SKL Jaddaf Telecom Est.

2020

2020 9 30

2020 9 30

Donati

100%



3



			7	3
	3		1	
1		3		1
			1	
				1

2020 11 20 McDermott Will&Emery Saca Precision Technology
S.r.l. and Donati S.r.l.- Saca 2018 2019
Saca 2018 Saca 2018 2019 Donati
2018 2019

2020 11 9

PCL HWL

SPEC HAAL

2020 11 17

SKL

2020 10 2 GCA LAW PARTNERS LLP
STK 2017 5 18

STK

STK

2020 10 1
2017 1 1

ZBT

ZBT

2020 10 2 AZ MORE
SVJ

SVJ



1

11 14 STK RAVPOWER

20 STK
STK
STK
2019

2020 10 1 ZBT

2020 10 2 AZ MORE

SVJ SVJ 2017 1 1

1

10,000

2018 9 4

[2018]9

2017 7 22

20

2020 10 22

2017 1 1

20

10,000

2

2020 11 20 McDermott Will&Emery Saca Precision Technology
S.r.l. and Donati S.r.l.- Saca
Donati

2020 11 9 ()

2018 2 5

2020 11 17 ()

SKL 2017 1 1

AKIN GUMP STRAUSS HAUER &FELD LLP

STK

US Customs and Border Protection CBP STK

5%

5%

