

2023 年尽责管理年度报告

2023 Annual Report of Due Diligence Management

1. 公司信息:

我司原称广东致远新材料有限公司，于 2020 年 9 月 11 日正式更名为稀美资源（广东）有限公司（以下简称为稀美资源）。冶炼厂位于广东省英德市桥头镇，CID 号码是 CID000616。稀美资源一直以质优价廉的钽铌产品，服务于广大客户，并通过持续的创造力，满足消费者日新月异的多样化需求。在给客户提供满意产品的同时，稀美资源从来没有忘记应承担的社会责任，并且严格遵守我国相关的法律法规和国际规则。

稀美资源致力于成为一家负责任、有担当、创造价值、追求卓越的全球钽铌制造运营商。为充分体现企业的社会责任感及价值观，同时作为 TIC 以及 ITSCI 成员，本公司致力于建立完善的尽责管理体系，承诺严格甄选原料来源，坚决避免来自高风险供应链的不合规原料，以防止非法利益团体因此获利，造成当地持续动乱、冲突升级，或严重侵犯人权。

Company Information:

Previously named Guangdong Zhiyuan New Material Co., Ltd, the company officially changed the name to XIMEI Resources (Guangdong) Limited (hereinafter referred to as XIMEI Resources) on Sept. 11, 2020. The smelter located in Qiaotou Town, Yingde City, Guangdong Province with the CID number CID000616. XIMEI Resources has been serving the customers with Tantalum/Niobium products of high quality and low costs, and meeting the ever-changing needs of consumers through continuous creativity. While providing satisfactory products to our customers, XIMEI Resources has never forgotten our social responsibilities. We strictly abide by relevant laws and regulations and international rules.

XIMEI Resources is dedicated to becoming a responsible, value-creating and excellent international Tantalum-Niobium material manufacturer and operator. To fully embody the company's social responsibility and values, as a member of the TIC and ITSCI, the company is committed to establishing a sound due diligence management system, strictly selecting the source of raw materials, resolutely avoiding procurement of non-compliant raw materials from high-risk supply chains so as to prevent benefiting interest groups in the region which results in continuous local unrest or conflict escalation or serious human right violations.

2. RMAP 评估总结:

作为一个负责任的公司，稀美资源一直积极支持并参加负责任矿产审验流程(RMAP)每年的审核。截止到 2023 年 12 月，稀美资源已经连续 11 次接受了 RMAP 审核。最新一次审核的评估时间为 2023 年 6 月 29 日-2023 年 6 月 30 日，评估期自 2022 年 6 月 01 日至 2023 年 6 月 27 日，评估由 RMI 委托的独立第三方审核公司执行，稀美资源顺利通过了此年度的审核。

RMAP Assessment Summary:

As a responsible company, XIMEI Resources has been actively supporting and participating in the annual audit of Responsible Minerals Assurance Process (RMAP). As of December 2023, XIMEI Resources has completed RMAP in 11 consecutive times. The latest RMAP audit time was June 29 - June 30, 2023. The assessment period starts from June 01, 2022 to June 27, 2023. The audit was performed by an independent third party designated by RMI and XIMEI passed it successfully.

3. 负责任矿产供应链政策:

稀美资源一直严格遵守并完全遵从“OECD 对受冲突影响地区和高风险地区矿物负责任的供应链的尽职调查指

and trade from becoming a source of conflict, human rights violations and insecurity. In January of 2024, we reviewed and revised all internal control procedures and documents again to ensure compliance with the latest regulations.

5.1 稀美资源定期更新尽职调查管理体系，使其与 OECD 指南和 RMAP 保持一致。

XIMEI Resources has updated its due diligence management system to align it with OECD guidance and RMAP.

5.2 稀美资源定期向所有已确定上游供应商传达了最新的供应链政策和采购要求。

XIMEI Resources has informed all identified upstream suppliers of the latest supply chains policies and procurement requirements.

5.3 公开、透明的采购政策：1) 稀美资源的原材料采购声明已载于稀美资源公共网站，确保每位供应商都清楚地了解我们的采购政策。2) 稀美资源向企业内部各部门下发了《尽责采购管理控制程序》和《负责任采购政策》，确保每位员工都知晓并按照执行。

Open and transparent procurement policy: 1) XIMEI Resources' procurement statement of raw materials has been posted on XIMEI Resources public website so that each supplier has a clear understanding of our procurement policy. 2) XIMEI Resources issued the "Responsible Purchasing Control Procedures" and the "Responsible Purchasing Policy" to all internal departments of the company, making every employee aware and follow.

5.4 原材料采购的控制程序：稀美资源已制定并通过执行《尽责采购管理控制程序》、《风险管理与 CAHRAs 识别程序》、《负责任采购政策传播和培训制度》、《负责任审计和年度报告管理程序》、《原料采购和产品发货流程》、《产品编号流程》、《原矿厂内编号及生产批号的制定和更改流程》、《原料和产品运输过程和单据管理的程序文件》、《从冶炼厂购买和加工钽物料的规定》、《关于含放射性物料的存储和运输的规定》、及《钽物料平衡核算管理流程》等 11 个过程控制程序，限制和阻止任何“冲突原料”和不明原料进入稀美资源的供应链。

Control procedures for raw material procurement: XIMEI Resources has formulated and passed 11 procedures including "Responsible Purchasing Management Control Procedures", "Risk Management and CAHRAs Identification Procedures", "Responsible Purchasing Policy Communication and Training System", "Responsible Purchasing Audit and Annual Report Management Procedures", "Raw Materials Procurement and Product Delivery Process", "Regulations on Product Numbering", "Formulation and Modification of Raw Materials Lot Numbers and Production Lot Numbers", "Raw Materials & Products Transportation and Documentation Management Control Procedures", "Regulations on the Purchasing and Processing of Tantalum Materials from Smelters", "Regulations of Storage and Transportation on Radioactive Materials", and "Management Process for Material Balance Accounting", to restrict and stop any "conflict raw materials" or unidentified raw materials entering XIMEI Resources' supply chains.

5.5 可追溯的原料追踪流程：通过已实施《原料和产品运输过程和单据管理的程序文件》、《原矿厂内批号和生产批号的制定和更改》《专矿专用的规定》等流程保障所有钽原料在被使用过程中的追溯与控制。

Tracking process for traceable materials: Through the implementation of the "Raw Materials & Products Transportation and Documentation Management Control Procedures", "Formulation and Modification of Raw Materials Lot Numbers and Production Lot Numbers" and "Regulations on Use of Minerals", tracking and control of all Tantalum raw materials in use is guaranteed.

5.6 采用符合国际准则的原料运输控制体系及检测方法：稀美资源严格遵守包含 7 类物质在内的有害物质运输的规定，同时，建立并实施了《放射性矿石管理办法》。

5.10 通过网络、内部通告等向社会公众宣传“OECD 对受冲突影响地区和高风险地区矿物负责的供应链的尽职调查指南”、负责任商业联盟（RBA）关于钽供应链的审验标准的最新要求以及负责任矿物供应链透明度的要求。

Promote to the public through the Internet, internal announcements, etc. "OECD's due diligence guidance for responsible supply chains of minerals in conflict-affected areas and high-risk areas", the latest requirements of the Responsible Business Alliance's audit standards for Tantalum supply chains, and requirements for transparency in the mineral supply chains.

5.11 已建立申诉通道，稀美资源向社会开通了多种申诉通道，包括电话、信函、面谈、互联网等方式，旨在接受社会各界的监督与持续改进。申诉程序已公示于稀美官网，申诉人登录稀美官网点击“联系我们”输入需要申诉的信息提交即可。

Have established a channel of complaint, XIMEI Resources has opened a variety of complaint channel to the society, including telephone, letter, interview, Internet and other methods, designed to accept the supervision and continuous improvement of the community. The complaint procedure has been published on the XIMEI official website. The complainant can log in to the official website of Ximei and click "Contact Us" to input the information required for appeal and submit it.

5.12 在必要的情况下，稀美资源通常愿意与上游供应商和下游客户分享供应链数据和信息。

When necessary, XIMEI Resources is usually willing to share supply chains data and information with upstream suppliers and downstream customers.

5.13 形式多样的员工培训：稀美资源通过集中培训、内部通告、展板宣传等方式培训包括高级管理层在内的企业所有员工，使他们充分了解“OECD 对受冲突影响地区和高风险地区矿物负责的供应链的尽职调查指南”和负责任商业联盟（RBA）关于钽供应链的审验标准的最新要求以及负责任矿物供应链透明度的要求。

Various forms of staff training: XIMEI Resources trains all employees of the enterprise, including senior management, through centralized training, internal announcements, and publicity on display boards, so that they can fully understand that "OECD's due diligence guidance for responsible supply chains of minerals in conflict-affected areas and high-risk areas", the latest requirements of the Responsible Business Alliance's audit standards for Tantalum supply chains, and requirements for transparency in the mineral supply chains.

5.14 积极履行社会责任，打造合规经营，对社会负责任的公司形象。公司始终把企业经济发展与履行社会责任紧密结合起来，保证合法、道德经营前提下，通过实现技术创新、安全生产、员工权益、环境节能减排和社会公益等活动，全面履行社会责任。

Actively fulfill social responsibilities, build a corporate image that is compliant and responsible to society. The company has always closely integrated the economic development of the company with the fulfillment of social responsibilities, ensuring the legal and ethical operation, and fulfilling its social responsibilities in a comprehensive manner through the realization of technological innovation, safe production, employee rights, energy conservation and emission reduction, and social welfare.

5.15 按 OECD 要求，涉及到负责任采购管理体系及钽供应链的所有相关文件，应保存五年以上不得销毁，以电子文档形式保存且路径清晰易于查找。

All relevant documents related to the management system and supply chain will be kept for at least five years and cannot be destroyed. They will be stored in electronic form with clear and easy to find paths, according to the requirements of OECD.

6. 风险评估 Risk Assessment :

For other non-CAHRAs regions, we use the following tools to assess the risk of raw material supply chains: 《HEIDELBERG CONFLICT BAROMETER》, 《HUMAN FREEDOM INDEX 》(HFI), 《WORLD JUSTICE PROJECT》(WJP) and 《LIST OF GOODS PRODUCED BY CHILD LABOR OR FORCED LABOR》.

7. 风险管理 Risk Management:

7.1 对于受冲突影响和高风险地区（CAHRAs）的原料，我们只接受 ITSCI / Better Mining 打标打袋体系的原料，同时我们采用 ITSCI / Better Mining 钽矿石供应链监管体系及现场监察体系提供的信息，监督高风险地区钽矿开采的尽职情况。自 2014 年，稀美资源就成为了 ITSCI 的正式会员，并一直积极支持 ITSCI 的工作，加入其源于高风险钽原料的追溯验证。2019 年，又加入了 Better Mining 这一审验体系并通过该体系采购了一笔原料。稀美资源对外公布，对源于高风险供应链的钽原料，稀美资源只采购具有 ITSCI / Better Mining 打标打袋体系的原料。

For raw materials originating from conflict-affected and high-risk areas (CAHRAs) we only accept raw materials from the ITSCI/Better Mining system. Make full use of the information provided by the ITSCI / Better Mining Tantalum ore supply chain supervision system and on-site monitoring system to supervise the due diligence of Tantalum mining in high-risk areas. Since 2014, XIMEI Resources has become a full member of ITSCI and has been actively supporting ITSCI's work, taking part in traceable verification from high-risk Tantalum materials. In 2019 XIMEI Resources started to use Better Mining and purchased the very first lot of Better Mining verified Tantalum materials. XIMEI Resources announced that for the Tantalum raw materials originating from high-risk supply chains, XIMEI Resources only purchases raw materials certified by ITSCI / Better Mining tagging and bagging system.

对于每个高风险采购交易，我们需要确认 ITSCI / Better Mining 提供的以下文件：

For each high-risk procurement transaction, we need to confirm the following documents provided by ITSCI/Better Mining:

- 1) 事件总结报告（在获得后）。Event summary report (after acquisition).
- 2) 矿场考察建议，包括具有潜在风险的矿场名单（建议向这些矿场采购的公司开展增强型尽职调查和风险评估）。

Mine site inspection recommendations, including a list of mine sites with potential risks (recommended companies that purchase from these mine sites conduct enhanced due diligence and risk assessment).

- 3) 国家和地区月度报告，审查实地的一般情况。

Monthly national and regional reports to review the general situation on the ground.

- 4) 数据总结和其他报告；Data summary and other reports.

经确认，在本报告期间，稀美资源所有源自受冲突影响和高风险地区（CAHRAs）采购的矿石均来自 ITSCI/Better Mining 打标体系内的原料，且事件总结报告、矿场考察建议、国家和地区月度报告、数据总结等数据均已获取。我司留意本审核周期内，North Kivu 地区的风险冲突自 2023 年 3 月起有升级情况，我司积极与供应商沟通此地区的矿石情况，获取该矿石的相关文件，并反复核对及评估，由于上游矿主采购该矿石的时间发生在冲突升级事情之前，因此我司对该矿石予以接受。考虑到该地区风险冲突暂未缓解，我司自 2023 年 10 月起将暂缓该地区的采购。

It is confirmed that during the reporting period, all ore procured by XIMEI Resources from conflict-affected and high-risk Areas (CAHRAs) was sourced from raw materials within the ITSCI/Better Mining system, and data such as incident summary reports, mine visit recommendations, country and regional monthly reports, and data summary were obtained.

Our company noticed that the risk conflict in North Kivu region has escalated since Oct 2023 in this audit cycle.

of Xime Resources and preventing the mining and trade of minerals from becoming a source of conflict, human rights violations and insecurity.

稀美资源（广东）有限公司/ XIMEI Resources (Guangdong) Limited

2024年8月1日/ August 1, 2024

