2025 年尽责管理年度报告

2025 Annual Report of Due Diligence Management

1. 公司信息：

我司前身为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”）。公司冶炼厂位于广东省英德市桥头镇，评估原料为含钽物料。稀美资源始终聚焦高品质钽铌产品的研发与生产，致力于为全球客户提供卓越的产品和服务，凭借持续的创造力和对品质的严格把控，我们不断满足客户日新月异的多样化需求。助力客户在各自领域取得更大成功，在追求业务发展的同时，稀美资源始终牢记企业社会责任，并且严格遵守我国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、追求卓越的国际钽铌制造运营商。我们深知企业的社会责任与价值观是可持续发展的基石，因此本公司致力于建立完善的尽责管理体系。我们郑重承诺：严格甄选原料来源，坚决杜绝采购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。本次年度报告覆盖周期为 2025 年 1 月 1 日到 2025 年 12 月 31 日。

Company Information:

Our company, formerly known as Guangdong Zhiyuan New Material Co., Ltd, officially changed the name to XIMEI Resources (Guangdong) Limited (hereinafter referred to as XIMEI Resources) on Sept. 11, 2020. Our smelter located in Qiaotou Town, Yingde City, Guangdong Province. The evaluated raw materials are tantalum-containing materials. XIMEI Resources has been committed to the research and development and production of high quality Tantalum/Niobium products. With continuous innovation and stringent quality control, we constantly meet the ever-changing and diversified needs of our customers, helping them achieve greater success in their respective fields. While providing satisfactory products to our customers, XIMEI Resources has never forgotten our social responsibilities. We strictly abides 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, 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. This annual report covers the period from January 1, 2025 to December 31, 2025.

2. OECD 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合规矿产供应链审核。截止到 2025 年 12 月，稀美资源已经连续 13 次接受了钽供应链评估审核。最新一次审核的评估时间为 2025 年 6 月 23 日-2025 年 6 月 24 日，评估期自 2024 年 6 月 24 日至 2025 年 6 月 07 日，评估由有资质的第三方审核公司 UL 执行，稀美资源顺利通过了此年度的审核，评估报告链接为：

https://www.responsiblemineralsinitiative.org/media/docs/Public Reports/Ximei Resources Public Report.pdf。

The OECD Assessment Summary:

As a responsible company, XIMEI Resources has been actively supporting and participating in the annual audit of Compliant mineral supply chain. As of December 2025, XIMEI Resources has completed such assessments

in 13 consecutive times. The latest assessment was June 23 - June 24, 2025. The assessment period starts from June 24, 2024 to June 07, 2025. The assessment was conducted by UL, a qualified third party audit firm and XIMEI passed it successfully. The link to the evaluation report is:

https://www.responsiblemineralsinitiative.org/media/docs/Public Reports/Ximei Resources Public Report.pdf.

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南”。按照指南和要求，为避免使用直接或间接为武装团体提供资金或使他们得益的冲突矿物，及/或涉及在高风险和受冲突影响地区进行其他严重侵犯人权行为的冲突矿物，稀美资源制定了自己的合规矿产供应链政策。该政策载于稀美资源网站：www.ximeigroup.com。

Responsible Mineral Supply Chain Policy:

XIMEI Resources strictly adhered to and fully complied with the “OECD's due diligence guidance for responsible supply chains of minerals in conflict-affected areas and high-risk areas”. In accordance with guidance and requirements, to avoid directly or indirectly funding for or benefiting armed groups from conflict minerals and/or conflict minerals involving other serious human rights violations in high-risk and conflict-affected areas, XIMEI Resources has developed its own compliance mineral supply chains policy. The policy is posted on the XIMEI Resources website: www.ximeigroup.com.

4. 管理结构和责任：

根据 OECD 的指导方针，对不同国家和地区来的原料，我们依据不同的风险级别，已制定了管理方法，确保我们遵从 OECD 指南五步框架的要求。为此，稀美资源已成立了一个专门的尽责管理团队进一步保障尽职管理体系的高效运行，该团队由总经理领导，团队成员包括公司部分高管、经营负责人、采购负责人、审计负责人和各经办人员；稀美资源总经理负责监督尽职调查计划和风险管理的设计和实施；已任命负责尽职调查的高级经理协调相关部门（包括营销部、品质部、生产部、审计部和管理层）的工作，确保各部门恪尽职守，执行尽职调查计划并报告所发现的任何示警信号和潜在风险；按照尽职调查计划的要求每年对所有相关人员开展一次尽职调查管理体系培训，如计划有更新，公司会根据需要开展额外培训。

Management structure and responsibilities：

According to OECD guidance, we have developed management methods for raw materials from different countries and regions according to different risk levels to ensure that we comply with the five-step framework of OECD guidance. To this end, XIMEI Resources has established a dedicated management team, to ensure the high-efficient operation of the due diligence program. Led by the General Manager, the team members include some of the company's senior executives, business leaders, purchasing managers, audit leaders and other relevant staff, XIMEI Resources General Manager is responsible for supervising the design and implementation of due diligence plans and risk management; a senior manager is appointed to be responsible for due diligence and coordinate the work of all relevant departments (including marketing, quality, production, audit and top management) to ensure that all departments have fulfilled their duties and executed due diligence plans and reported any warning signals and potential risks found; conducting a due diligence management system training for all relevant personnel every year in accordance with the requirements of the due diligence program, and if the plan is updated, the company will carry out additional training as needed.

5. 公司管理体系：

稀美资源已建立了非常严格的供应链管理体系，并制定了一系列完整的供应链控制体系，通过一系列措施和程序确保绝不采购和使用来自高风险供应链的原料，防止任何高风险原料和不明原料进入稀美资源的供应链，防止矿

物的开采和贸易成为冲突、人权侵犯和不安全的来源。2026 年 1 月，我们再次审查并修订了所有的内部控制程序和文件，确保符合最新的规范。

Management System:

XIMEI Resources has established a very strict management system for the supply chains, and has developed a series of complete supply chains control systems. Through these measures and procedures to ensured that the raw materials from high-risk supply chains are never purchased or used, and that high risk raw materials and unidentified raw materials are not allowed to enter the supply chains, in order to prevent mineral exploitation and trade from becoming a source of conflict, human rights violations and insecurity. In January of 2026, 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 指南和内部文件保持一致。

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

5.2 稀美资源已于 2026 年 1 月向所有已确定上游供应商再次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 in January 2026.

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) 稀美资源已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 类物质在内的危害物质运输的规定，同时，已建立并实施了《辐射性矿石管理办法》。

Adopting the raw material transportation control system and testing method in line with international standards: XIMEI Resources strictly abides by the regulations on the transportation of hazardous substances including Class 7 materials, and in the meantime, establishes and implements the “Management Regulations on the Radioactive Materials”.

5.7 对供应商进行尽职调查并保持持续性：按照 OECD 指南的审核要求，稀美资源定期对原料供应商进行尽职调查，通过对供应商的合法性、质量保证程度和符合性进行复审验证，作为采纳或取消其供方资格的依据。如果我们发现任何不符合项，我们将要求其整改，整改后，如还不能满足要求的，我们将立即停止从该公司采购并退回所购的不符合的原料，并暂停和该供应商的合作直至重新评估达到要求。

Conduct due diligence on suppliers and maintain continuity: In accordance with the OECD guidance requirements, XIMEI Resources regularly conducts due diligence on raw material suppliers, and reviews the legality, quality assurance and compliance of suppliers as the basis for accepting or disqualifying suppliers into the supply system. If we find any non-conformance, we will ask for rectification. After the rectification, if the requirements still cannot be met, we will immediately stop purchasing from the company and return the purchased non-conforming materials, and suspend cooperation with the supplier until the reassessment meets the requirements.

5.8 广泛的大众传播渠道：1) 稀美资源通过对上游原料供应商的尽职调查，向所有供应商宣传“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南”和负责任钽供应链透明度要求。同时提醒和督促上游原料供应商合法合规经营，不经营任何“冲突原料”和来历不明的原料。有关“非冲突”的特别条款在我们与所有供应商的合同中都有规定，所有供应商都承诺所供原料为“非冲突原料”。2) 稀美资源积极参加由国际组织，如 TIC、RMI 等组织主办的会议，而且经常与下游客户讨论，共同学习了解“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南”、和负责任钽供应链透明度要求。

Extensive public communication channels: 1) XIMEI Resources, through due diligence investigation on upstream raw material suppliers, promotes to all suppliers “OECD's due diligence guidance for responsible supply chains of minerals in conflict-affected areas and high-risk areas”, and requirements of responsible supply chains. At the same time, the company reminds and urges upstream raw material suppliers to operate legally and compliantly, and do not operate any “conflict materials” or unidentified raw materials. The special terms for ‘non-conflict’ are set out in our contracts with all suppliers, and all suppliers are committed to providing “non-conflicting materials”. 2) XIMEI Resources actively participates in conferences organized by international organizations such as TIC, RMI, etc., and often discusses with downstream customers to learn about the “OECD's due diligence guidance for responsible supply chains of minerals in conflict-affected areas and high-risk areas” and transparency requirements for responsible Tantalum supply chains.

5.9 在保持与下游客户沟通的同时，按 OECD 的要求，稀美资源向下游客户提供冲突矿产披露表单，以确保供应链的尽职调查。对于向我司供应中间产品、符合 OECD 评估要求的合规冶炼厂，我们同样要求其提供该披露表单。

While maintaining communication with downstream customers, in accordance with OECD requirements, XIMEI Resources provides conflict minerals disclosure forms to downstream customers to ensure due diligence in the supply chains. We also require compliant smelters that supply intermediate products to our company and meet OECD assessment requirements to provide the same disclosure forms. 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任的供应链的尽职调查指南”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" 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 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任的供应链的尽职调查指南”关于钽供应链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",as well as the requirements for Tantalum supply chains, and mineral supply chains transparency.

5.13 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.

5.14 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. 风险识别、评估及缓解 Risk Identification, Assessment and Mitigation

6.1 我们成立了风险评估小组，采用 OECD 附录二《受冲突影响和高风险区域矿石全球负责任供应链示范政策》

利用可靠的信息来识别供应商及商业伙伴提供的 KYC 信息（如核实营业执照、相关证件等证据）来确认供应商的企业所有权（包括公司架构）、公司管理人员和董事的姓名、识别相关业务、下属企业、母公司、关联企业信息等对供应商及合作伙伴的信息进行识别，在本报告期间，没有发现供应商所提供的信息存在不符合项或不实报道。

We set up a risk assessment team, adoption of the OECD Appendix II Model Global Responsible Supply Chain Policy for Minerals from Conflict-Affected and High-risk Regions Using reliable information to identify KYC information provided by suppliers and business partners (such as verification of business licenses, relevant documents and other evidence) to confirm the supplier's corporate ownership (including company structure), the names of company officers and directors, the identification of related businesses, and the identification of KYC information. Information of affiliated enterprises, parent companies and affiliated enterprises, etc., identify the information of suppliers and partners. During the period of this report, no non-conformance or false report was found in the information provided by suppliers.

6.2 我们通过核对与供应商交易相关记录和文件，具体包括如矿石原产地证明、矿石出口许可证、矿石运输单、海运提单、报关单、矿石收货确认书等各类文件，确认原料是否可以追溯到矿石原产地、识别矿石的开采、贸易、处理和出口的地点信息来反复核对上游供应链的证据与实际产地、运输路线等是否存在不符或存在风险示警信号。在本报告期内，钽供应链中未发现警示信号。

We check the records and documents related to the transaction with the supplier, including such documents as ore origin certificate, ore export license, ore transportation note, ocean bill of lading, customs declaration, receipt note of the ore etc. Confirm whether the raw material can be traced back to the ore's origin, identify the location of mining, trade, processing and export of the ore, and cross-check the evidence of the upstream supply chain with the actual origin, transportation route, etc., whether there is a discrepancy or risk warning signal. During the reporting period, no warning signs were found in the tantalum supply chain.

6.3 我们根据以下工具识别及评估原料供应链风险：《多德-弗兰克华尔街改革和消费者保护法》、《欧盟冲突矿产法规 EU - the Conflict Minerals Regulation》、《海德堡全球冲突晴雨表 HEIDELBERG CONFLICT BAROMETER》、《人类自由指数 HUMAN FREEDOM INDEX》(HFI)、《世界正义工程 WORLD JUSTICE PROJECT》(WJP)和《童工和强迫劳动产品清单 LIST OF GOODS PRODUCED BY CHILD LABOR OR FORCED LABOR》。经确认，在本报告期间，在《欧盟冲突矿产法规 EU - the Conflict Minerals Regulation》及《海德堡全球冲突晴雨表 HEIDELBERG CONFLICT BAROMETER》评估中，尼日利亚部分地区是 CAHRAs 地区，我们已对尼日利亚地区进行了加强型尽职调查，根据供应链地图、尼日利亚矿山分布、供应商运输路线等，发现矿产来源及运输路线未经过尼日利亚的 CAHRAs 地区，所以公司负责任采购管理工作组进行评估后识别尼日利亚地区的原料采购均为低风险。在本报告期内，所有钽原料供应链均为低风险。

We identify and assess raw material supply chain risks based on the following tools: Dodd-Frank Wall Street Reform and Consumer Protection Act, EU Conflict Minerals Regulation, Heidelberg Conflict Barometer, Human Freedom Index (HFI), World Justice Project (WJP), and List of Goods Produced by Child Labor or Forced Labor. It is confirmed that during the reporting period, according to the assessments of the EU Conflict Minerals Regulation and Heidelberg Conflict Barometer, some regions in Nigeria are classified as CAHRAs. We have conducted enhanced due diligence on the Nigerian regions. Based on the supply chain map, distribution of Nigerian mines, suppliers' transportation routes, etc., it is found that the sources of minerals and transportation routes do not pass through the CAHRAs in Nigeria. Therefore, after evaluation by the Company's Responsible Sourcing Management Working Group, it is identified that the raw material procurement in Nigeria is of low risk. During the reporting period, all tantalum raw material supply chains are of low risk.

7. 风险管理 Risk Management：

7.1 对于高风险供应链，我司会进行加强型尽职调查，具体包括：

（1）评估 CAHRA 的背景。

（2）获得供应商开展钽供应链尽职调查的证据。

（3）识别矿石的开采、贸易、处理和出口的地点和定量条件。

（4）可实地走访供应商，以取得和保存有关供应商（若相关）矿产开采、贸易、出口有关矿石的信息。

评估小组成员总结供应链风险评估过程中收集到的信息以及识别的实际风险或潜在风险，向指定的高层管理人员汇报调查结果。

For high-risk supply chains, we will conduct enhanced due diligence, including:

(1) Assess the background of CAHRA.

(2) Obtain evidence of supplier due diligence on tantalum supply chain.

(3) Identify the location and quantitative conditions under which the ore is mined, traded, processed and exported.

(4) Physically visited to obtain and maintain information about the mining, trade and export of minerals by the supplier (if relevant).

The evaluation team members summarize the information collected during the supply chain risk assessment process and the actual or potential risks identified, report the findings to the designated senior management.

7.2 我们通过以下方式进行风险管控：

（1）对于低风险供应链，可继续开展合作；

（2）对于高风险供应链，进行加强型尽职调查后，如加强型尽职调查后可对高风险供应链降级为低风险供应链，可以继续合作；若风险得不到解除，则应终止与该供应商的合作。

（3）本评估周期内无出现 OECD 附录二的相关风险。

Risk management can be carried out in the following ways:

(1) For low-risk supply chains, we can continue the cooperation with our suppliers;

(2) For high - risk supply chains, after conducting enhanced due diligence, if the high - risk supply chain can be downgraded to a low - risk one as a result of the enhanced due diligence, cooperation can continue. However, if the risks cannot be eliminated, the cooperation with this supplier should be terminated.

(3) No risks related to Appendix 2 of the OECD were identified during this evaluation period.

7.3 我们加强与供应商的沟通，并且在能力范围内支持和培养供应商改善尽职绩效，如推荐供应商积极参与上游审验机制，积极开展原料产地实地调查、向供应商传达 OECD 最新要求、要求供应商签订尽责承诺函、鼓励供应商参加 OECD 培训及相关会议等。

We strengthen communication with suppliers, and support and train suppliers to improve due diligence performance within our capabilities, such as recommending suppliers to actively participate in the upstream audit mechanism, actively carrying out field investigations of raw material origin, conveying the latest OECD requirements to suppliers, requiring suppliers to sign due diligence commitment letters, and encouraging suppliers to participate in OECD training and related meetings.

8. 结论 Conclusion：

稀美资源已建立非常严格的负责任钽供应链的管理体系，且通过培训、申诉机制、定期与供应商交流、信息咨询、收集交易追溯文件等力所能及的方式来进一步促进供应商建立有效的采购政策和管理体系。

我们始终把企业经济发展与履行社会责任紧密结合起来，在保证合法、道德、负责任的经营基础上，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，实现公司的可持续发展。

Ximei has established a very strict and responsible tantalum supply chain management system, and further promote suppliers to establish an effective procurement policy and management system to reduce or eliminate supply risks through training, appeal mechanism, regular communication with suppliers, information consultation, collection of transaction traceability documents and other means within our capacity.

We have always combined the economic development with the fulfillment of social responsibilities. On the basis of legal, ethical and responsible business operation, we will enable the company to achieve greater development through activities such as technological innovation, safe production, employee rights and interests, environmental energy conservation and emission reduction, and social welfare.

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

2026 年 10 月 30 日/ Oct 30, 2026