2025 年尽责管理年度报告

2025 Annual Report of Due Diligence Management

1. 公司信息：

稀美资源（贵州）科技有限公司（以下简称稀美贵州）是稀美资源（广东）有限公司的全资子公司，成立于2020 年 9 月 30 日。公司位于贵州省黔西南州兴义市义龙新区，主要生产钽条、钽棒、钽锭、熔炼钽等产品。

公司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。为践行这一愿景，本公司建立了尽责管理体系，承诺严格甄选原料来源，坚决避免采购来自高风险供应链的不合规原料。

Company Information:

XIMEI RESOURCES (GUIZHOU) TECHNOLOGY CO., LTD. (hereinafter referred to as XIMEI GUIZHOU) is a wholly-owned subsidiary of XIMEI RESOURCES (GUANGDONG) LIMITED, which was established on September 30, 2020. The factory is located in Yilong New District, Xingyi, Qianxinan, Guizhou Province, and mainly produces Tantalum bars, Tantalum rods, Tantalum ingots, smelting Tantalum and other products.

XIMEI GUIZHOU strives to be a responsible, accountable and value-driven global tantalum-niobium manufacturer that pursues operational excellence. To deliver on this vision, the company has established a due diligence management system, and promises to strictly select the sources of raw materials and resolutely avoid procurement of non-compliant raw materials from high-risk supply chains.

2. OECD 评估：

作为一个负责任的公司，稀美贵州一直致力于协助上游供应链共同承担社会责任，并严格遵守相关的法律法规和国际规则。截止到 2025 年 12 月，稀美贵州已经完成了 2 次负责任钽供应链评估。最新一次审核的评估时间为 2024 年 7 月 30 日，评估期自 2022 年 07 月 01 日-2024 年 7 月 28 日，评估由有资质的第三方审核公司执行，稀美贵州顺利通过了此年度的审核。

Downstream Assessment Program:

As a responsible company, XIMEI GUIZHOU has been committed to assisting the upstream supply chain to jointly undertake social responsibilities and strictly abide by relevant laws and regulations and international rules. As of December 2025, XIMEI GUIZHOU has completed 2 compliant tantalum supply chain assessments. The latest assessment was July 30, 2024. The assessment period starts from July 01, 2022 to July 28, 2024. The audit was conducted by a qualified t third party audit firm and XIMEI GUIZHOU passed it successfully.

3. 负责任采购政策：

稀美贵州始终严格遵守《经合组织（OECD）关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》。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，我们制定了自己的负责任采购政策。该政策载于稀美资源集团网站：www.ximeigroup.com。稀美贵州仅向通过国际公认钽负责任供应链评估的公司采购原料，并且整个过程中进行了严格管控，全过程按《OECD"五步框架"》的要求来执行。为确保政策落地，稀美贵州成立了一个专门的尽责管理团队，该团队由总经理领导，团队涵盖销售、采购、审计等核心岗位，对供应链实施持续、严格的尽职调查与风险管控。

Responsible Mineral Supply Chain Policy:

XIMEI GUIZHOU strictly adheres to and fully complies with the OECD's "Due Diligence Guidance for

Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas". In accordance with the guidance and requirements, to avoid to using the conflict minerals financing or benefiting the armed groups directly or indirectly, and/or involving other serious human rights violations in high-risk and conflict-affected areas. XIMEI GUIZHOU has developed its own responsible mineral supply chains policy. The policy is posted on the XIMEI RESOURCES website: www.ximeigroup.com. XIMEI Guizhou only sources raw materials from enterprises that have passed internationally recognized responsible tantalum supply chain assessments., and strictly controls the whole process, and resolutely implements the requirements of the "OECD Five-step Framework" and "Responsible Minerals Assurance Process". To this end, XIMEI GUIZHOU has established a dedicated due diligence management team, which is led by the General Manager, and the team members include the company's sales director, procurement director, audit director and other relevant staff. The team conducts continuous, rigorous due-diligence reviews and risk controls throughout the supply chain.

4. 公司管理体系：

稀美贵州严格遵守在供应链政策方面的承诺，并制定了以下的尽职调查内部流程：稀美贵州总经理负责总监督及资源调配；任命相关部门（包括营销部、品质部、生产部、审计部和其他管理人员）的工作，负责监督尽职调查计划和风险管理的设计和实施，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；2025 年 12 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。

且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，如程序有更新，稀美贵州会根据需要开展额外培训，确保每位员工知悉并按要求执行。

Management System:

XIMEI GUIZHOU strictly abides by its commitments in terms of supply chain policy and has developed the following internal due diligence processes: The General manager of XIMEI GUIZHOU is responsible for general supervision and resource allocation; Appoint relevant departments (including Marketing, Quality, Production, Audit and other management personnel) to oversee the design and implementation of the due diligence plan and risk management, to ensure that the due diligence plan is carried out and any warning signals and potential risks identified are reported; In Dec of 2025, we reviewed and revised all internal control procedures and documents again to ensure compliance with the latest regulations. Conduct due diligence management system training for all relevant personnel once a year in accordance with the requirements of the due diligence plan. If our policy is updated, the company will carry out additional training as necessary to ensure that every employee is aware of it and executes it as required.

5. 内部控制体系：

稀美贵州已制定尽职管理体系，使其符合 OECD 指南的要求。

Internal Control System:

XIMEI GUIZHOU has developed a due diligence management system that complies with the OECD guidance requirements.

5.1 公开、透明的采购政策：(1) 稀美贵州的《负责任采购政策》已载于稀美资源集团官方网站，使每位供应商都清楚地了解我们的采购政策。(2) 稀美贵州向企业内部各部门下发了《负责任采购政策》和《尽责采购管理控制程序》，使每位员工都知晓并按照执行。(3) 稀美贵州已向上游供应商传达了最新的供应链政策。

Open and transparent procurement policy: (1) XIMEI GUIZHOU's 'Responsible Purchasing Policy' has been posted on XIMEI RESOURCES official website so that each supplier has a clear understanding of our procurement policy. (2) XIMEI GUIZHOU has issued the "Responsible Purchasing Policy" and the

"Responsible Purchasing Management Control Procedures" to all internal departments of the company, making every employee aware and follow. (3) XIMEI GUIZHOU has conveyed the latest supply chain policy to upstream suppliers.

5.2 原料采购的控制程序: 稀美贵州制定并通过执行《尽责采购管理控制程序》、《风险评估和缓解程序》、《负责任采购政策传播和培训程序》、《负责任采购审计和年度报告管理程序》、《原料采购和产品发货流程》、《物料分类及编号管理程序》、《原料和产品运输过程及单据管理程序》、及《钽物料平衡核算管理流程》等过程控制程序，限制和阻止任何"冲突原料"和不明原料进入稀美贵州的供应链。

Control procedures for raw material procurement: XIMEI GUIZHOU has formulated and passed procedures including "Responsible Purchasing Management Control Procedures", "Risk Management Procedures", "Responsible Purchasing Policy Communication and Training Procedures", "Responsible Purchasing Audit and Annual Report Management Procedures", "Raw Materials Procurement and Product Delivery Process", "Material classification and numbering management procedures", "Raw Materials & Products Transportation and Documentation Management Control Procedures", and "Tantalum Material Balance Accounting Management Process " to restrict and stop any "conflict raw materials" or unidentified raw materials entering into XIMEI GUIZHOU's supply chains.

5.3 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，稀美贵州对原料供应商进行了尽职调查，通过对供应商的合法性、合规性、风险高低程度，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，我们将不予纳入合格供应商名录。

Conduct due diligence on suppliers and maintain continuity: In accordance with the OECD guidance requirements, XIMEI GUIZHOU has conducted due diligence on raw material suppliers, adopting or canceling the qualification of the suppliers based on their legality, compliance and risk level. If we find any non-conformity, we will require it to rectify, after rectification, if it still cannot meet the requirements, we will not be included in the list of qualified suppliers.

5.4 可追溯的原料追踪流程：通过实施《原料和产品运输过程及单据管理程序》以保障所有钽原料在被使用过程中的追溯与控制，涉及到供应链的尽职调查文件，应保存五年以上不得销毁。

Raw material tracking process: through the implementation of "Raw Materials & Products Transportation and Documentation Management Control Procedures", to ensure the traceability and control of all Tantalum raw materials in the process. Due diligence documents related to the supply chain shall be kept for more than five years and shall not be destroyed.

5.5 多种方式培训员工：稀美贵州通过集中培训、内部通告、采购政策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"以及负责任矿物供应链透明度的要求。

Training employees in various ways: XIMEI GUIZHOU trains all employees, including senior management, by centralized training, internal announcements, display purchasing policy and other ways, so that to make them fully understand the "OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas", as well as the requirements for Tantalum supply chains and responsible mineral supply chains transparency.

5.6 大众传播渠道：通过通告、网络等向社会公众宣传"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"以及负责任矿物供应链透明度的要求。

Mass communication channels: Publicize the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas", requirements for transparency in responsible mineral supply chains to the public through announcements, networks and other ways.

5.7 已建立申诉通道，稀美贵州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 GUIZHOU 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.

5.8 稀美贵州积极参加由国际组织，如 TIC，而且经常与下游客户讨论，共同学习“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”、OECD 审核标准和负责任钽供应链透明度的要求。

XIMEI GUIZHOU actively participates in international conferences hosted by international organizations, such as TIC and often discusses and learn with downstream customers “OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”, OECD assessment standards and requirements for transparency in responsible tantalum supply chains.

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，具体包括如产品送货单、物流运输单、产品包装单、矿石收货确认书、矿石原产地证明、矿石出口许可证、矿石运输单、海运提单、报关单等各类文件，确认原料是否可以追溯到矿石批次、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，以及通过冲突风险、政府治理风险和人权风险三个维度是否存在示警信号或途径高风险 CAHRAs 地区来评估示警信号。自 2024 年起，供应商提供的原料均不来自高风险地区。在本报告期间，钽供应链风险级别为低风险。

We check the records and documents related to the transaction with the supplier, including such documents as product delivery note, logistics transportation note, product packaging note, ore receipt confirmation, ore origin certificate, ore export license, ore transportation note, ocean bill of lading, customs declaration, etc. Confirm whether the raw material can be traced back to the ore batch, 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, In addition, warning signals were assessed by the three dimensions of conflict risk,

governance risk and human rights risk or through high-risk CAHRAs regions. Since 2024, the raw materials provided by the supplier were not from high-risk areas. During the reporting period, the tantalum supply chain risk level was low risk.

6.3 我们通过复核供应商的负责任供应链尽职调查的实施情况，包括是否已建立供应链采购政策、执行各项有关政策和要求、是否已建立 CAHRAs 程序及相关风险评估记录、已取得供应商尽职调查实践的证据、是否已对供应商绩效进行定期监管及建立能力建设计划等信息来评估是否存在不符合项；通过审查，本报告期间，未发现不符合项。

We review our supplier's implementation of responsible supply chain due diligence, Including whether a supply chain procurement policy has been established, policies and requirements have been implemented, whether CAHRAs procedures and associated risk assessment records have been established, evidence of supplier due diligence practices have been obtained, whether supplier performance has been regularly monitored and a capacity building program has been established to assess the existence of non-conformities; Upon review, no nonconformities were found during the reporting period.

6.4 我们通过反复核对供应商的相关记录和文件，评估供应链风险，包括供应商已返回的报告是否为最新版本；MRT 报告中是否已识别风险点；供应商填写的冲突矿产披露报告信息是否与真实情况一致等信息；通过审查，本报告期间，未发现不符合项。

We assess the risk by cross-checking the relevant records and documents of the supplier, including whether the report returned by the supplier is the latest version; Whether risk points have been identified in the MRT report; Whether the conflict minerals disclosure forms report information filled in by the supplier is consistent with the real situation and other information; Upon review, no nonconformities were found during the reporting period.

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）获得供应商开展钽供应链尽职调查的证据。

（2）对所有风险评估团队提供的信息进行评议。

（3）依据上述程序，反复核对供应商尽职调查实践的证据。

（4）经识别发现供应商中钽供应链存在示警信号，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、处理、精炼、出口有关矿石的增补内容况的信息。

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，并形成评估记录《钽供应链风险评估报告》。

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

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

(2) Review the information provided by all risk assessment teams.

(3) Cross-check evidence of supplier due diligence practices in accordance with the above procedures.

(4) After identifying the presence of warning signals in the tantalum supply chain of the supplier, the supplier can be visited to obtain and preserve information about the supplementary content of the supplier's (if relevant) mineral mining, trade, processing, refining, and export of related ores.

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, and form the evaluation record Tantalum Supply Chain Risk Assessment Report.

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，若风险得不到解除，则应终止与该供应商的合作。若采取加强型尽职调查后的六个月内能够取得可衡量的重大改进（且无示警信号），可继续与供应商开展合作。

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, if the risk is not relieved after enhanced due diligence, the cooperation with the supplier shall be terminated. If significant measurable improvements can be achieved within six months of the enhanced due diligence (and no warning signs), work with the supplier may continue.

6.5 2025 年 1 月，稀美贵州对原料供应商进行现场审计，具体审计内容包括：基本职责了解与执行、供应商管理、供应链风险管理、负责认采购政策传播及培训、厂内原料管理情况和仓库库位及标识管理。同时，抽查供应商相关矿石采购记录和全套追溯文件，包括上游供应商信息、原产地信息、运输路线等。整体看，供应商对负责认采购管理非常重视，总体执行效果较好，供应商采购的原料均来自低风险供应链。

In Jan,2025, XIMEI GUIZHOU conducted on-site audit of raw material suppliers, including: understanding and implementation of basic responsibilities, supplier management, supply chain risk management, responsible for procurement policy dissemination and training, in-plant raw material management and warehouse location and identification management. At the same time, spot check suppliers related ore procurement records and a full set of traceability documents, including upstream supplier information, origin information, transportation routes, etc. On the whole, the supplier attaches great importance to the responsible procurement management, and the overall implementation effect is good. All raw materials procured by the supplier come from low-risk supply chains.

6.6 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.

稀美贵州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，让公司获得更大的发展。

XIMEI GUIZHOU has always combined the economic development with the fulfillment of social responsibilities. Under the premise 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（贵州）科技有限公司/XIMEI RESOURCES (GUIZHOU) TECHNOLOGY CO., LTD.

2026 年 10 月 30 日/Oct 30, 2026