2026 年负责任采购政策

2026Responsible Purchasing Policy

稀美资源（广东）有限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，我们根据《经济合作与发展组织 (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（第三版）》附件一中定义的“尽职调查五步框架”，建立并持续完善尽责管理体系，公司郑重承诺：严格甄选原料来源，坚决杜绝采购源自高风险供应链的不合规原料，以防止相关利益团体因此获利，造成当地持续动乱或冲突升级以及侵犯人权带来的负面影响。为此，本公司已制订如下负责任采购政策，并向上下游供应链传播，以供各方遵守并执行，本政策涵盖矿产为含钽原料：

Ximei Resources (Guangdong) Co., Ltd. strives to be a responsible, accountable and value-driven global tantalum-niobium manufacturer that pursues operational excellence. To deliver on this vision, we have established and continuously improve a robust responsible-management system and conduct due diligence in strict accordance with the five-step framework set out in Annex I of the OECD Third Edition Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”). We are committed to rigorously verifying the origin of all raw materials and unequivocally excluding any non-compliant feedstock linked to high-risk supply chains, thereby preventing any interest groups from profiting at the expense of prolonged instability, escalated conflict or human-rights abuses. Accordingly, the Company has adopted the following Responsible Sourcing Policy, which is communicated to all upstream and downstream partners for full compliance and implementation. This policy applies to all tantalum-bearing raw materials.

1、与矿产开采、运输或交易有关的严重侵权行为。在受冲突影响和高风险区域采购或经营活动时，我们不会容忍也不会以任何方式获利、帮助、协助或为任何一方提供便利来实施：

Regarding serious abuses associated with the extraction, transport or trade of minerals. While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commissioned by any party of:

（1）任何形式的酷刑，残忍、不人道和有辱人格的待遇；

Any form of torture, cruel, inhuman and degrading treatment;

（2）任何形式的强迫或强制劳动；强迫或强制劳动是指以惩罚作为威胁榨取的任何个人的、并非该人自愿提供的劳动或服务；

Any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;

（3）最恶劣形式的童工；

The worst forms of child labor;

（4）其他严重侵犯和践踏人权的行为，如普遍的性暴力行为；

Other gross human rights violations and abuses such as widespread sexual violence;

（5）战争罪或其他严重违反国际人道主义法的行为，反人类罪或种族灭绝罪。

War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

如果我们有合理理由认为该风险存在，即上游供应商正从实施上述规定的严重侵权行为的任何一方进行采购或与该方有关联，我司将立即中止或中断与该供应商的合作。

If we have reasonable grounds to believe that the risk exists, that is, the upstream supplier is purchasing from any party that commits the serious infringements listed above or is associated with that party, our company will immediately suspend or terminate cooperation with the supplier.

2、关于直接或间接支持非国家武装团体。我们不会容忍任何通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供直接或间接的支持。通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供“直接或间接的支持”，包括且不限于从非国家武装团体或其关联方购买矿产，向其进行付款，或以其他方式为其提供后勤支援或设备等。这些武装团体或关联方包括：

Regarding direct or indirect support to non-state armed groups. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

（1）非法控制矿址，或以其他方式控制运输路线、矿产交易点以及供应链的上游行为主体；

Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;

（2）在矿址入口、运输路线沿线或矿产交易点非法征税或勒索钱财或矿产；

Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded;

（3）对中间商、出口企业、或国际贸易者非法征税或勒索。

Illegally tax or extort intermediaries, export companies or international traders.

如果我们有理由认为上游供应商正向非国家武装团体提供直接或间接支持的任何一方进行采购或与之存在关系，我们将立即中止或中断与该供应商的合作。

If we have reasonable grounds to believe that an upstream supplier is purchasing or has a relationship with any party that provides direct or indirect support to a non-state armed group, we will immediately suspend or terminate cooperation with that supplier.

3、关于公共或私人的安全部队。杜绝向非法控制矿场、运输路线以及供应链上游行为主体，在矿址入口、运输路线或矿产交易点非法征税或勒索，或向中间商、出口企业和国际贸易者非法征税或勒索的公共或私人安全武装提供直接或间接支持。

Regarding public or private security forces. We agree to eliminate, direct or indirect support from public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

我们认可矿址及/或周边地区以及/或运输路线沿线的公共或私人安全武装的作用仅是维护法治，包括保障人权、保护矿工、设备和设施安全、保护矿址或运输路线以使合法的开采和贸易不受干扰。

We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

如果我们发现在一定程度上存在此类风险，将根据企业在供应链上所处的具体位置，立即制定、采用和实施上游供应商及其他利益相关方风险管理计划，从而使为公共或私人安全武装提供直接或间接支持的风险得到遏制或降低。如果风险管理计划实施未起作用，我们将暂时停止或中断与上游供应商的合作。

If we find that there is such a risk to a certain extent, we will immediately formulate, adopt and implement a risk management plan for upstream suppliers and other stakeholders according to the specific position of the enterprise in the supply chain, so that the risk of direct or indirect support to public or private security forces is contained or reduced . If the implementation of the risk management plan does not work, we will temporarily suspend or terminate the cooperation with upstream suppliers.

4、关于行贿受贿及矿产原产地的欺诈性失实陈述。我们不会提出、承诺、进行或索要任何贿赂，并且抵制诱惑，不会为了掩盖或伪造原产地，虚报矿产开采、贸易、处理、运输、出口等活动应向政府缴纳的税收、费用和特殊开采费而行贿。

Regarding bribery and fraudulent misrepresentation of the origin of minerals. We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

5、关于洗钱。如果我们有理由认为，存在因开采、贸易、处理、运输或出口在矿址入口、运输路线沿线、或上游供应商矿产交易地进行非法征税或勒索而得的矿产所引起或与之相关的洗钱风险，我们将支持或采取措施，为有效消除洗钱行为作出贡献。

Regarding money laundering. We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

6、关于向政府支付的税收、费用、特许费。我们将确保向政府支付所有与受冲突影响和高风险区域矿石开采、贸易、出口相关的合法税收、费用和特许费，并且承诺根据企业在供应链上所处位置依照《采掘行业透明度行动计划》(EITI)中的各项原则对此类支付进行披露。

Regarding the payment of taxes, fees and royalties due to governments. We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such

payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

根据企业在供应链上所处的位置，我们承诺与供应商、中央或地方政府机关、国际组织、民间社会以及受影响的第三方酌情进行合作，在合理的时间跨度内采取显著措施防范或降低负面影响，并对绩效进行改善和跟踪。若风险降低措施未起作用，我们将暂时停止或中断与上游供应商的合作。

In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organization, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

7、关于运输。我们将会严格遵守 7 类物质(Class 7)的国际运输标准，并且我们确保在危险物质的处置、储存、运输符合相关法律法规的要求。我们保证在运输和生产过程中不会发生泄漏，从而防止对环境和人体造成不利影响。

Regarding transportation. We will strictly abide by the international transportation standards of Class 7 substances, and we will ensure that the disposal, storage and transportation of hazardous substances comply with the requirements of relevant laws and regulations. We guarantee that there will be no leakage during transportation and production, so as to prevent adverse effects on the environment and the human body.

8、供应商管理。对于每个供应商，我们会要求对方填写 KYC 及提供钽来源的证明材料，并根据联合国安全理事会制裁名单、美国财政部 OFAC 制裁名单、欧盟 EEAS 的综合制裁名单、供应商所在国家制裁名单及审核工厂所在国家的制裁清单核查相关情况，根据我们的风险管理流程评估其风险等级，然后根据尽责管理采购流程（基于负责任矿产审验流程和 OECD 指导原则）进行采购，对于每笔交易会严格审查对应文件并保留记录。

Supplier Management. For each supplier, we require them to complete KYC (Know Your Customer) and provide certification materials of tantalum sources. We will verify relevant information against the United Nations Security Council sanctions list, the US Treasury OFAC sanctions list, the EU EEAS consolidated sanctions list, the sanctions list of the supplier's country, and the sanctions list of the country where the audit factory is located. The risk level will be assessed according to our risk management process, and then procurement will be carried out in accordance with the due diligence procurement process (based on the Responsible Minerals Assurance Process and OECD guidelines). For each transaction, the corresponding documents will be strictly reviewed and records will be retained.

9、申诉机制。我们设立了申诉渠道广泛听取意见并持续改善。我们会广泛推广上述采购政策，包括且不限于供应商、客户、员工以及社区，同时我们承诺遵守联合国相关制裁决议，遵守适用执行此类决议的中国法律，承诺不参与任何会为冲突提供帮助或便利的行为。如未及时达成降低风险采购之效果，我们将暂时停止或中断与相关供应商的采购。

Grievance mechanism. We have set up a complaint channel to listen to opinions and continue to improve. We will widely promote the above procurement policies, including but not limited to suppliers, customers, employees, and communities. At the same time, we are committed to complying with relevant UN sanctions resolutions, complying with Chinese laws applicable to the implementation of such resolutions, and committing not to provide any assistance or convenience to the conflicts. If the risk of procurement is not reduced in a timely manner, we will suspend or terminate the cooperation with relevant suppliers.

申诉邮箱/ Complaint sent to: shenji@ximeigroup.com

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

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