

2020 年尽责管理年度报告

2020 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）。公司有一个冶炼厂，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、追求卓越的国际钽铌制造运营商。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，坚决避免采购高风险地区的不合规原料，以防止该区域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 company has a 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 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, 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 areas 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 2020 年 12 月，稀美资源已经连续 8 次接受了 RMAP 审核。最新一次审核的评估时间为 2020 年 6 月 29 日-2020 年 7 月 1 日，评估期自 2019 年 6 月 26 日至 2020 年 6 月 25 日，评估由 RMI 委托的独立第三方执行，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 2020, XIMEI Resources has completed RMAP in 8 consecutive times and successfully passed the 2019-2020 annual audit. The latest RMAP audit time was June 29 - July 1, 2020. The assessment period starts from June 26, 2019 to June 25, 2020. 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

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负责任矿产供应链政策。该政策载于稀美资源网站：www.ximeigroup.com。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，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。

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 responsible mineral supply chains policy. The policy is posted on the XIMEI Resources website: www.ximeigroup.com. 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, which is 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.

4. 公司管理体系:

稀美资源对供应链有非常严格的管理体系，制定一系列完整的供应链控制体系，通过以下措施和程序确保绝不采购和使用受冲突影响地区来的冲突原料，防止任何冲突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。2021 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。

稀美资源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；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 System:

XIMEI Resources has 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 it is ensured that the conflict materials from conflict-affected areas are never purchased or used, and that any conflict 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 2021, we reviewed and revised all internal control procedures and documents again to ensure compliance with the latest regulations.

XIMEI Resources strictly abides by its commitments in supply chains policies and has developed internal processes for due diligence: 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. 内部控制体系:

Internal Control System:

5.1 稀美资源已更新其尽职调查管理系统，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 稀美资源已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，使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》，使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》。

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 指南和负责任矿物倡议（RMI）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 and the audit requirements of the Responsible Minerals Initiative (RMI), 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.

5.7 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的供应链的尽职调查指南”、RMAP 评估标准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、ITSCI 等组织主办的国际的会议，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的供应链的尽职调查指南”、RMI 审核标准和负责任钽供应链透明度要求。稀美资源与 ITSCI 保持定期沟通，并密切关注学习 ITSCI 的事件报告、月生产评估、月地区状态评估报告等，以便及时了解各矿山的情况。

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", RMAP criteria 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 international conferences organized by international organizations such as TIC, ITSCI, 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", RMI audit standards and transparency requirements for responsible Tantalum supply chains. XIMEI Resources maintains regular communication with ITSCI and pays close attention to the ITSCI event report, monthly production assessment, monthly regional status assessment report, etc., in order to keep abreast of the mines.

5.9 在保持与下游客户沟通的同时，按 RBA 的要求，稀美资源向下游客户提供 CMRT，以确保供应链的尽职调查。对上游给我们供应中间产品的 RMAP 评估合规冶炼厂，我们也要求他们提供 CMRT。

While maintaining communication with downstream customers, in accordance with RBA requirements, XIMEI Resources provides CMRT to downstream customers to ensure due diligence in the supply chains. For RMAP

assessment compliance smelters that supply us with intermediate products upstream, we also require them to provide CMRT.

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 建立投诉通道，稀美资源向社会开通了投诉通道，包括电话号码、负责人，旨在愿意接受社会各界的监督。

To establish a channel of complaint, XIMEI Resources has opened a complaint channel to the society, including the telephone number and the person in charge, and is willing to accept supervision from the society.

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 多种方式培训员工：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。

Training employees in various ways: 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.

6. 风险识别

Risk Identification

6.1 公司设计了一套“了解你的交易方（KYC）”表格，包括关于供应商法律地位和身份信息、供应商分析和潜在风险，并收集了相关的支持文件。我们所有的供应商都完成并返回了表格。公司的尽职调查计划经理与采购团队一起审查了提供的信息和联合国制裁名单。只要在 KYC 表格中发现不一致、错误或不完整信息，公司将要求他们改进。在本报告期间，没有发现与所提交的 KYC 表格相关的示警信号。公司根据供应商提供的信息对矿源地以及转运地进行基于风险评估管理程序进行风险识别，根据识别结果进行风险管理。

The company has designed a set of Know Your Customer (KYC) forms, including information about the

supplier's legal status and identity, supplier analysis and potential risks, and collection of relevant supporting documents. All our suppliers have completed and returned the form. The company's due diligence program manager and the procurement team have reviewed the information provided and the UN sanctions list. As long as inconsistencies, errors or incomplete information is found in the KYC form, the company will ask them to improve. During the period of this report, no warning signal related to the submitted KYC form was found. Based on the information provided by the supplier, the company conducts risk identification based on risk assessment management procedures for the mine source and transshipment place, and carries out risk management based on the identification results.

6.2 对每一笔交易，稀美资源要求供应商提供原产地信息和整套追溯单据，包括合法运输路线和直接供应商名称和地址。

For each transaction, XIMEI Resources requires suppliers to provide origin information and a complete set of traceability documents, including legal transportation routes and direct supplier names and addresses.

6.3 充分利用 ITSCI / BSP 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。

Make full use of the information provided by the ITSCI / BSP Tantalum ore supply chain supervision system and on-site monitoring system to supervise the due diligence of Tantalum mining in high-risk areas.

7. 风险评估及风险降低

Risk Assessment and Risk Reduction

7.1 对于稀美资源评估后认定为高风险的地区和供应商，如果当地没有公司认可的上游审验机制（如 ITSCI / BSP），考虑到公司目前的审查能力，该供应商将不予以合作。

For regions and suppliers identified as high-risk by XIMEI Resources after evaluation, if there is no upstream auditing mechanism approved by the company (such as ITSCI / BSP), the company will not cooperate with the supplier considering the current auditing capabilities of our company.

7.2 对于每笔来自高风险地区的交易，稀美资源一直都是采用以下计划来评估其风险：广泛认可的上游保证机制——ITSCI / BSP 打标打袋体系。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 BSP 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，对源于高风险地区的钽原料，稀美资源只采购具有 ITSCI / BSP 打标打袋体系的原料。对于每个高风险采购交易，ITSCI / BSP 提供以下文件：1) 事件总结报告（在获得后）。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）。3) 国家和地区月度报告，审查实地的一般情况。4) 数据总结和其他报告，稀美资源经常注重学习 ITSCI / BSP 的其它报告和文件，例如事故报告、管理评估报告、公司审核报告等。

For every transaction from a high-risk area, XIMEI Resources has always used the following plan to assess its risk: the widely recognized upstream assurance mechanism-- ITSCI / BSP tagging and bagging system. 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 Sourcing Program (BSP) and purchased the very first lot of BSP verified Tantalum materials. XIMEI Resources announced that for the Tantalum raw materials originating from high-risk areas, XIMEI Resources only purchases raw materials certified by ITSCI / BSP tagging and bagging system. For each high-risk purchase transaction, ITSCI / BSP provides the following documents: 1) Event summary report (after acquisition). 2) 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) Monthly national and regional reports to review the general situation on the ground. 4) Data summary and other reports. XIMEI Resources often pays attention to studying other ITSCI / BSP reports and documents, such as accident reports, management assessment reports, company audit reports, etc.

7.2 除此之外，无论是对高风险还是低风险，稀美资源要求所有的供应商提供下列文件/信息，这些信息涉及每一笔交易。1) 供应商的尽职调查计划，包括 KYC 调查表、公司注册登记证或公司营业执照、采矿证(如果是采矿公司)、税务登记证。2) 密切关注当地公司的运营/国家背景有关的治理信息。3) 收集每笔交易供应链监管链文件确保了解交易来源和运输路径。

In addition, XIMEI Resources requires all suppliers to provide the following documents / information, whether related to high or low risk, which involves every transaction. 1) Supplier's due diligence plan, including KYC questionnaire, company registration certificate or company business license, mining certificate (if mining company), tax registration certificate. 2) Pay close attention to the governance information of the local company's operations / country background. 3) Collect supply chain custody documents for each transaction to ensure that the source of the transaction and the transportation path are understood.

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



2021年1月15日 / January 15, 2021