

1. 公司信息：

稀美资源（贵州）科技有限公司（以下简称稀美贵州公司）是稀美资源（广东）有限公司（CID 号码是 CID000616）的全资子公司，成立于 2020 年 9 月 30 日。厂区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、熔炼钽等含钽产品。

稀美贵州公司秉持着稀美资源集团一贯的经营理念，致力于协助稀美资源集团成为一家负责任、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，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。

1. Company Information:

XIMEI RESOURCES (GUIZHOU) TECHNOLOGY CO., LTD. (hereinafter referred to as XIMEI GUIZHOU) is a wholly-owned subsidiary of XIMEI RESOURCES (GUANGDONG) LIMITED (CID No. CID000616), 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 Tantalum-containing products.

XIMEI GUIZHOU adheres to the consistent business philosophy of XIMEI RESOURCES Group, and is committed to assisting XIMEI RESOURCES Group to become 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 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. DAP 评估：

作为一个负责任的公司，稀美贵州公司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。我们计划于 2022 年下半年参与 RMI 项下的“下游评估计划”(Downstream Assessment Program)，证明其负责任的采购实践符合经合组织 (OECD)《受冲突影响和高风险地区负责任矿产供应链尽职调查指南》，以满足下游客户对采购实践不断增长的需求。相关准备工作已经在进行中。

2. 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. We plan to participate in the Downstream Assessment Program under RMI in the second half of 2022 to demonstrate its responsible sourcing practices are in line with the (OECD) "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" in order to meet the growing demands of downstream customers on procurement practices. Relevant preparations are already underway.

3. 负责任采购政策：

稀美贵州公司一直严格遵守并完全遵从经合组织 (OECD)《受冲突影响和高风险地区负责任矿产供应链尽职调查指南》。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，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。稀美贵州公司只向通过 RMAP 认证的公司采购原料，并且整个过程中进行了严格管控，坚决按《经合组织五步框架》和《负责任矿物审验流程》的要求来执行。为此，稀美贵州公司成立了一个专门的尽责管理团队，该团队由总经理领导，团队成员包括公司销售负责人、采购负责人、审计负责人等。

3. 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 purchases raw materials from companies that have passed the RMAP, 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.

4. 公司管理体系:

稀美贵州公司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：稀美贵州公司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、审计部和其他管理人员）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。

4. Management System:

XIMEI GUIZHOU strictly abides by its commitment to the supply chain policy, and has developed the following internal due diligence procedures: the General Manager of XIMEI GUIZHOU is responsible for supervising the design and implementation of the due diligence plans and risk management; appointing a senior manager responsible for due diligence to coordinate the work of relevant departments (including Marketing, Quality, Production, Audit and other management members) to ensure that all departments perform due diligence, implement the due diligence plan and report any red flags and potential risks identified; as the requirements of the due diligence plan, the company will conduct a due diligence management system training for all relevant personnel annually. If the plan is updated, the company will conduct the additional training as needed.

5. 内部控制体系:

5. Internal Control System:

公司已制定尽职管理体系，使其符合 OECD 指南和 RMI 的要求。

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

5.1 公开、透明的采购政策：(1) 稀美贵州公司的《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) 公司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) 公司已向上游供应商传达了最新的供应链政策。

5.1 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：稀美贵州公司制定并通过执行《尽责采购管理控制程序》、《风险管理程序》、《负责任采购政策传播和培训程序》、《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》、《原料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公司的供应链。

5.2 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”, “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”, 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 指南和负责任矿物倡议（RMI）的审核要求，稀美贵州公司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。

5.3 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 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-conforming items, we will require them to rectify. After rectification, if the requirements still cannot be met, we will immediately stop purchasing from the supplier and return the purchased non-compliant raw materials, and suspend cooperation with the supplier until their reassessment meets the standards.

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》、《原料厂内编号及生产批号的制定和更改流程》等流程保障所有钽原料在被使用过程中的追溯与控制。在必要的情况下，稀美贵州公司愿意与上游供应商和下游客户分享供应链数据和信息。

5.4 Raw material tracking process: through the implementation of “Raw Materials & Products Transportation and Documentation Management Control Procedures”, “Formulation and Modification of Raw Materials Lot Numbers and Production Lot Numbers” and other processes to ensure the traceability and control of all Tantalum raw materials in the process. If necessary, XIMEI GUIZHOU is willing to share supply chain data and information with upstream suppliers and downstream customers.

5.5 多种方式培训员工：稀美贵州公司通过集中培训、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责任的供应链的尽职调查指南”和 RMI 审核标准的最新要求以及负责任矿物供应链透明度的要求。

5.5 Training employees in various ways: XIMEI GUIZHOU trains all employees, including senior management, by centralized training, internal announcements, display boards 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”, and the latest requirements of the RMI standards and requirements for transparency in responsible mineral supply chains.

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的供应链的尽职调查指南”、RMI 审核标准的最新要求以及负责任矿物供应链透明度的要求。

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

5.7 建立投诉通道：稀美贵州公司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。

5.7 Establish a grievance channel: XIMEI GUIZHOU has opened a complaint channel to the society, including phone number and person in charge, willing to accept supervision from all social communities.

5.8 稀美贵州公司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“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的要求。

5.8 XIMEI GUIZHOU actively participates in international conferences hosted by international organizations, such as TIC, ITSCI and other organizations, 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”, RMI audit standards and requirements for transparency in responsible tantalum supply chains.

6. 风险识别、评估及缓解

6. Risk Identification, Assessment And Mitigation

6.1 向供应商发出《供方调查表》(KYC) 并请其填写返回，获取供应商的身份、业务范围等信息。只要在 KYC 表格中发现不一致、错误或不完整的信息，公司会要求供应商解释并改进。除了 KYC 表格之外，稀美贵州公司还要求供应商提供如公司注册登记证或公司营业执照、税务登记证、CMRT 冲突矿产报告等相关支持性文件。在本评估周期，没有发现与所提交的 KYC 过程相关的示警信号。

6.1 Issue the Know Your Customer form (KYC) to the supplier and ask the supplier to complete and return in order to obtain the supplier's identity, business scope and other information. Whenever inconsistencies, errors or incomplete information are found in the KYC form, the company will ask the supplier to explain and improve. In addition to the KYC form, XIMEI GUIZHOU also requires suppliers to provide relevant supporting documents such as company registration certificate or company business license, tax registration certificate, and CMRT conflict minerals report. During this assessment period, no red flags related to the KYC process submitted were identified.

6.2 使用《风险管理程序》，从供应商风险和物料风险两个维度评估供应链的风险级别，判定公司是否接受该供应链。对于最终的风险等级被判定为低风险的供应链，同意纳入公司供应系统。对于最终的风险等级被判定为高风险的供应链，考虑到公司目前评估考察供应链的能力，不予纳入公司供应系统，不予合作。在本评估周期，我司未与任何高风险供应链展开合作。

6.2 Using the "Risk Management Procedure", assess the risk level of the supply chain from the two dimensions of supplier risk and material risk, and determines whether the company accepts the supply chain. For the supply chain whose final risk level is judged to be low risk, it will be included into the company's supply system. For the supply chain whose final risk level is judged to be high risk, considering the company's current ability of evaluating and inspecting the supply chain, it will not be included into the company's

supply system and will not cooperate. During the reporting period, our company did not cooperate with any high-risk supply chain.

6.3 对于已经发生的交易，及时向供应商收集交易追溯文件。如有必要，可要求供应商提供更上层级的追溯文件，包括但不限于：采矿证书、原产地证明、ITSCI / BSP 认证文件（如适用），生产、运输、储存、报关、检验等过程中产生的各类文件。在第一时间对收到的各类追溯文件进行仔细浏览鉴别，如发现文件与实际产地、运输路线等不符，立即封存相关物料，并及时向负责采购管理工作组和供应商反馈，等待核实后采取后续处理措施。在本评估周期，没有发现与交易追溯文件相关的示警信号。

6.3 For transactions that have already occurred, we will timely collect transaction traceability documents from the suppliers. If necessary, the suppliers can be required to provide the higher-level traceability documents, including but not limited to mining certificate, certificate of origin, ITSCI / BSP certification documents (if applicable), and various files that are generated during the production, transportation, storage, customs declaration, and inspection. We will carefully check and identify the traceability documents once received at the first time. If the documents are found to be inconsistent with the actual origin, transportation routes and others, the relevant materials will be sealed immediately, and at the same time a report will be sent to the Responsible Procurement Management Working Group. The suppliers shall wait for verification and follow-up measures. During the reporting period, no red flags related to transaction traceability documents were identified.

6.4 与供应商保持定期的交流，若供应商的业务范围、经营活动、供应链合规性等任意方面发生变更，要求供应商及时反馈给我司。如有必要，需重进行供应商识别、选择和批准流程。在本评估周期，没有发现与上述相关的示警信号。

6.4 Maintain regular communication with the suppliers. If the supplier's business scope, activities, the compliance of supply chain and other aspects have changed, we will require the supplier to report to our company timely. If necessary, the supplier identification, selection and approval process needs to be redone. During the reporting period, no red flags related to the above were identified.

稀美贵州公司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.

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