

# 2023 年尽责管理年度报告

## 2023 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）。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。

### 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 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 abide 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 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.

### 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 2023 年 12 月，稀美资源已经连续 11 次接受了 RMAP 审核。最新一次审核的评估时间为 2023 年 6 月 29 日-2023 年 6 月 30 日，评估期自 2022 年 6 月 01 日至 2023 年 6 月 27 日，评估由 RMI 委托的独立第三方审核公司执行，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 2023, XIMEI Resources has completed RMAP in 11 consecutive times. The latest RMAP audit time was June 29 - June 30, 2023. The assessment period starts from June 01, 2022 to June 27, 2023. 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](http://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 responsible mineral supply chains policy. The policy is posted on the XIMEI Resources website: [www.ximeigroup.com](http://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，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进一步保障尽责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；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:**

稀美资源对供应链有非常严格的管理体系，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。2024 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 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 ensure 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 2024, 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 RMAP 保持一致。

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

5.2 稀美资源定期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，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，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.

5.8 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”、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任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任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 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 Ximeimei and click "Contact Us" to input the information required for appeal and submit it.

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 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”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。

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", 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.

5.15 按 OECD 要求，涉及到负责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. 风险评估 Risk Assessment



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 采购团队定期与供应商保持交流，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，确保及时获取到供应商的变更信息，并根据具体情况重新进行供应商识别、选择和批准流程。经内部评估，如该供应商或供应链被判定为高风险，稀美会立即终止与供应商的此笔贸易，并暂停与该供应商的合作至少三个月，直至供应商重新提交的风险缓解措施被证实已经完全消除了风险，方能重启与该供应商的合作。

The procurement team maintains regular communication with the supplier. If the supplier's business scope, business activities, supply chain compliance and other aspects change, ensure that the supplier's change information is timely obtained, and re-conduct the supplier identification, selection and approval process according to the specific situation. After an internal assessment, if the supplier or supply chain is determined to be high risk, XIMEI will immediately terminate this trade with the supplier and suspend cooperation with the supplier for at least three months until the supplier's resubmitted risk mitigation measures are verified to have completely eliminated the risk

6.3 我们通过查阅所有簿记或采购、缴纳税款、费用和特许费情况的其他证据，以及出口单证等信息来识别供应商是否存在与矿产开采、运输或交易有关的冲突或严重侵权行为；是否直接或间接支持非国家武装团体、洗钱、行贿或伪造原产地、供应链路线等欺诈性等失实行为；是否向政府支付税收、费用或持续费等行为，在本报告期间，没有发现钽供应链中存在示警信号。

We check all bookkeeping or other evidence of procurement, payment of taxes, fees and royalties, as well as export documents and other information to identify whether there is a conflict or serious infringement by a supplier in connection with the extraction, transportation or trading of minerals; Whether they directly or indirectly support non-state armed groups, money laundering, bribery or fraudulent activities such as falsifying origin and supply chain routes; Whether to pay taxes, fees or special renewal fees to the government, during the reporting period, no warning signs were found in the tantalum supply chain.

6.4 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进行佐证，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稀美资源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。稀美已识别到上游原料来源为受冲突影响和高风险地区（CAHRAs）和其他非 CAHRAs 地区。



For each transaction, Ximei Resources requires suppliers to provide a complete set of traceability documents for support, we check the records and documents related to transactions with suppliers, Specifically include such as product delivery note, logistics transport note, product packaging note, ore receipt confirmation, ore origin certificate, ore export license, ore transport note, ocean bill of lading, customs declaration and other documents, 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, And whether there are warning signals in the three dimensions of conflict risk, government governance risk and human rights risk or through high-risk CAHRAs areas to assess warning signals. Xime Resources carries out risk identification based on risk assessment management procedures for mine source and transfer sites according to the information provided by suppliers, and carries out risk management according to the identification results. Ximei has identified upstream raw material sources as conflict-affected and high-risk areas (CAHRAs) and other non-CAHRAs areas.

6.4.1 对于受冲突影响和高风险地区（CAHRAs）的原料供应链，我们主要根据《多德-弗兰克华尔街改革和消费者保护法》和《欧盟冲突矿产法规 EU - the Conflict Minerals Regulation》进行风险识别。

For the raw material supply chain in conflict affected and high-risk areas (CAHRAs), we mainly identify risks based on 《the Dodd-Frank Wall Street Reform and Consumer Protection Act》and 《EU - the Conflict Minerals Regulation》.

6.4.2 对于其他非 CAHRAs 地区,我们用以下工具评估原料供应链的风险:《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》。

For other non-CAHRAs regions, we use the following tools to assess the risk of raw material supply chains: 《HEIDELBERG CONFLICT BAROMETER》, 《HUMAN FREEDOM INDEX》(HFI), 《WORLD JUSTICE PROJECT》(WJP) and 《LIST OF GOODS PRODUCED BY CHILD LABOR OR FORCED LABOR》.

## 7. 风险管理 Risk Management:

7.1 自 2014 年,稀美资源成为了 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 Better Mining 这一审验体系并通过该体系采购了一笔原料。对源于高风险供应链的钽原料,稀美资源只采购具有 ITSCI / Better Mining 打标打袋体系的原料。采用上游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。同时,稀美还会对供应商进行额外的尽职调查,包括:严重侵权行为、支持非国家武装团体、公共或私人安全武装、行贿受贿及矿产原产地合法合规、洗钱及政府相关费用等评估该供应链风险,以确保采购的原料合规性。

Since 2014, Ximei Resources has become a full member of ITSCI, and has been actively supporting the work of ITSCI, joining its traceability verification of high risk tantalum raw materials. In 2019, we joined the Better Mining verification system and purchased a batch of raw materials through the system. For tantalum raw materials from high-risk supply chains, Ximei Resources only purchases raw materials with ITSCI/Better Mining marking and bagging system. The information provided by upstream supply chain supervision system and on-site monitoring system is used to supervise the due diligence of tantalum mining in high-risk areas. At the same time, the company will also conduct additional due diligence on suppliers, including: serious violations, support for non-state armed groups, public or private security forces, bribery and mineral origin legal compliance, money laundering and government related costs assessment of the supply chain risk, to ensure the procurement of raw materials compliance.



对于每个高风险采购交易，我们需要核查以下文件：

For each high-risk procurement transaction, we need to confirm the following documents:

- 1) 事件总结报告。Event summary report.
- 2) 实地考察报告。Field assessment report
- 3) 国家和地区月度报告，审查实地的一般情况。Monthly national and regional reports to review the general situation on the ground.
- 4) 数据总结和其他报告。Data summary and other reports.
- 5) 出口商 KYC。Exporter KYC.
- 6) 矿场尽责考察报告。On-site due diligence Mine site report
- 7) 全套追溯文件。Full set of traceability documents.

经确认，稀美资源所有源自受冲突影响和高风险地区（CAHRAs）采购的矿石均来自 ITSCI/Better Mining 打标体系内的原料，且事件总结报告、矿场考察建议、国家和地区月度报告、数据总结等数据均已获取。

我司通过以上数据及上游供应商提供的实地考察报告对供应链进行评估，收集了上游矿山的规模、员工情况、是否有童工、是否有与矿产开采、运输、或贸易有关的严重侵权行为、是否直接或间接支持非国家武装团体、公共或私人武装是否给当地带来负面影响、是否存在行贿受贿、原产地是否合法合规、是否有洗钱风险、是否向政府缴纳合法税收、费用和持续费等。本报告期间，未发现钽供应链的实际风险。

另外我司留意本审核周期内，North Kivu 地区的风险冲突自 2023 年 3 月起有升级情况，我司积极与供应商沟通此地区的矿石情况，获取该矿石的相关文件，并反复核对及评估，由于上游矿主采购该矿石的时间发生在冲突升级事情之前，因此我司对该矿石予以接受。考虑到该地区的风险冲突暂未缓解，我司自 2023 年 10 月起将暂缓该地区的采购。在本报告期间，我司采购的源自受冲突影响和高风险地区（CAHRAs）采购的矿石风险级别为低风险。

It is confirmed that all ore procured by XIMEI Resources from conflict-affected and high-risk Areas (CAHRAs) was sourced from raw materials within the ITSCI/Better Mining system, and data such as incident summary reports, mine visit recommendations, country and regional monthly reports, and data summary were obtained.

Our company has conducted an assessment of the supply chain based on the aforementioned data and field investigation reports provided by upstream suppliers. We have collected information on the scale of upstream mines, employee conditions, the presence of child labor, any serious violations related to mining, transportation, or trade, whether there is direct or indirect support for non-state armed groups, whether public or private armed forces have had a negative impact on the local area, the existence of bribery and corruption, the legality and compliance of the origin, the risk of money laundering, the payment of legal taxes, fees, and ongoing charges to the government, etc. During the reporting period, During the period of this report, no actual risks were identified in the tantalum supply chain.

Additionally, our company has noted that there has been an escalation of conflict risks in the North Kivu region since March 2023. We have actively communicated with our suppliers regarding the ore situation in this area, obtained relevant documentation for the ore, and conducted repeated checks and assessments. Since the upstream mine owners purchased the ore before the escalation of the conflict, our company has accepted this ore. Considering that the conflict risks in this area have not been alleviated, our company will temporarily suspend purchases from this region starting from October 2023. During the reporting period of this report, the risk level of ores purchased by our company from conflict-affected and high-risk areas (CAHRAs) is classified



as low risk.

7.2 对于其他非 CAHRAs 地区的原料: 原料采购业务经办人员对收集的供应商资料和相关信息进行初审, 填写《钽供应链风险评估报告 (CAHRAs 识别)》, 提交至公司负责任采购管理工作组进行内部复审, 从而判定该供应链最终的风险等级。

For raw materials from other non-CAHRAS regions: Raw material procurement management personnel shall conduct a preliminary review of the collected supplier data and related information, fill in the Tantalum Supply Chain Risk Assessment Report (CAHRAs Identification), and submit it to the Responsible procurement Management working group of the company for internal review, so as to determine the final risk level of the supply chain.

经确认, 在本报告期间, 有出现一个地区的示警信号, 我们已对该地区进行了加强型尽职调查, 公司负责任采购管理工作组进行评估后同意将该地区降级为低风险, 故所有源自非 CAHRAs 地区的矿石均为低风险供应链的合规原料。

It has been confirmed that during the reporting period, there was a warning signal in a certain region. We have conducted an enhanced due diligence investigation in the region, and the responsible procurement management team of the company has evaluated and agreed to downgrade the region to low risk. Therefore, all ores sourced from non CAHRAs regions are compliant raw materials for the low risk supply chain.

7.3 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, 可通过相关实地考察报告, 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, 包括确认是否存在严重侵权行为、是否支持非国家武装团体、是否有公共或私人安全武装、是否有行贿受贿及矿产原产地合法合规、洗钱及政府相关费用的评估, 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》和《ITSCI 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, including the assessment of the existence of serious violations, support for non-state armed groups, public or private security forces, bribery and legal compliance of mineral origin, money laundering and government related costs, report the findings to the designated senior management, and form the evaluation record Tantalum Supply Chain Risk Assessment Report and ITSCI



## Tantalum Supply Chain Risk Assessment Report.

## 7.5 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，并暂停与该供应商的合作至少三个月，直至供应商重新提交的风险缓解措施被证实已经完全消除了风险，方能重启与该供应商的合作。

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 a high risk supply chain, if the risk is not alleviated after enhanced due diligence, the cooperation with the supplier shall be terminated and suspended for at least three months until the risk mitigation measures resubmitted by the supplier are confirmed to have completely eliminated the risk..

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 RMI 最新要求、要求供应商签订尽责承诺函、鼓励供应商参加 RMI 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 RMI requirements to suppliers, requiring suppliers to sign due diligence commitment letters, and encouraging suppliers to participate in RMI training and related meetings.

## 8. 结论 Conclusion:

稀美资源有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，降低或排除供应风险，稀美资源优先与非 CAHRAS 地区的低风险的供应链开展合作；对于源自受冲突影响和高风险地区（CAHRAS）的供应链，稀美资源只接受 ITSCI / Better Mining 打标打袋体系的原料；稀美资源注重学习 ITSCI / Better Mining 的报告和文件，例如事故报告、管理评估报告、公司审核报告等。并且对来自受冲突影响和高风险地区（CAHRAS）的原料进行严格的尽职调查，确保原料的合法性和合规性。如果相关文件缺失或无法对上游情况进行说明，我司将拒绝采购该体系认证的矿石，从而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。

We have 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 prioritize cooperation with low-risk supply chains in non-CAHRAS regions. For supply chains originating from conflict-affected and high-risk areas (CAHRAS), Ximei Resources only accepts raw materials from the ITSCI/Better Mining Marking and baggage system. Ximei Resources focuses on learning ITSCI/Better Mining reports and documents, such as accident reports, management evaluation reports, company audit reports, etc. Rigorous due diligence is carried out on raw materials from conflict-affected and high-risk areas (CAHRAS) to ensure their legality and compliance. If the relevant documentation is missing or the upstream situation cannot be explained, we will refuse to purchase ore certified under this system, thereby preventing any high-risk and unknown raw materials from entering the supply chain of Xime Resources and preventing the mining and trade of minerals from



becoming a source of conflict, human rights violations and insecurity.

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

2024 年 9 月 24 日/September 24<sup>th</sup>,2024

