



Supply Chain Due Diligence Report

PT Sunny Metal Industry

旭日金属工业有限公司

供应链尽责管理报告

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1. 报告说明 Preparation Instructions

编制主体 Reporting Entity

旭日金属工业有限公司（SNMI），为了便于表述和方便阅读，在本报告中也以“旭日金属”、“公司”或“我们”指代。

PT Sunny Metal Industry (SNMI), hereinafter referred to in this report as “SNMI,” “the Company,” or “we” for ease of reference and readability.

编制范围 Reporting Scope

本报告包含公司镍供应链尽责管理体系建设、风险识别与评估、风险预防和缓解、独立第三方外部评估、报告等尽责管理步骤内容。相关信息和数据主要涵盖 2025 年 3 月 1 日-2026 年 2 月 28 日公司展开的各项供应链尽责管理工作。

This report covers the Company’s due diligence processes in the nickel supply chain, including the establishment of the due diligence management system, risk identification and assessment, risk prevention and mitigation, independent third-party assessment, and reporting. The relevant information and data mainly encompass the Company’s supply chain due diligence activities carried out between March 1, 2025, and February 28, 2026.

编制依据 Basis of Preparation

公司根据经济合作与发展组织（OECD）发布的《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）》、
责任矿产倡议（RMI）的负责任矿产保证程序（RMAP）、《联合国
指导原则报告框架》等进行编制。

The report is prepared in accordance with the following guidelines and frameworks: *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)*, *Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP)* and *UN Guiding Principles Reporting Framework*.

发布周期 Reporting Frequency

公司供应链尽责管理报告每年发布一次，相关方可公开查阅报告进展。
公司将定期更新报告，我们诚挚欢迎各界对我司供应链尽责管理工作
提出建议和意见。

The Company's Supply Chain Due Diligence Progress Report is published annually and is publicly accessible to stakeholders. The report will be updated periodically, and we sincerely welcome feedback and suggestions from all parties regarding our supply chain due diligence efforts.

2. 关于我们 About Us

公司名称	旭日金属工业有限公司
Company Name	PT Sunny Metal Industry
公司地址	印度尼西亚纬达贝工业园区，中哈马黑拉县
Company Address	Indonesia Weda Bay Industrial Park, Central Halmahera
RMAP CID 编号	CID005496
RMAP CID No.	CID005496

公司简介 Corporate Overview

PT. Sunny Metal Industry 于 2021 年 8 月设立，2022 年 1 月开始建设，于 2023 年 Q1 全产，生产基地位于印度尼西亚纬达贝工业园区，含 4 条冰镍 /RKEF 生产线之镍铁厂，拥有四座 60,000KVA 矿热炉、四座回转窑、四座干燥窑，一座风淬镍处理系统，原料为红土镍矿，主要产品为镍生铁及低冰镍。生产能力为年产能 5.5 万镍金属吨。

PT. Sunny Metal Industry was established in August 2021. Construction began in January 2022, and the plant reached full production in Q1 2023. The production site is in the Weda Bay Industrial Park, Central Halmahera , Indonesia. The facility operates four RKEF ferronickel production lines, equipped with four 60,000 kVA submerged arc furnaces, four converters, four rotary dryers, and one oxygen-enriched nickel matte processing system. Its

main raw material is nickel ore, and its primary products are nickel matte and nickel pig iron. The production capacity is 55,000 tons of nickel metal content per year.

报告期间 2025年3月1日-2026年2月28日

Reporting Period March 1, 2025 - February 28, 2026

3. 供应链尽责管理实践 Responsible Supply Chain

Management Practices

本章为旭日金属工业有限公司在本报告周期（2025年3月1日-2026年2月28日）开展的供应链尽责管理实践工作的简要概述，内容包括矿产供应链尽责管理的五个步骤。

This chapter provides a concise overview of the responsible supply chain management practices implemented by PT Sunny Metal Industry during the reporting period (March 1, 2025 - February 28, 2026). The content encompasses the five-step due diligence framework for mineral supply chain responsibility.



3.1. 步骤一：建立尽责管理体系 Step 1 : Establish a Due Diligence

Management System

3.1.1. 供应链尽责管理政策 Supply Chain Due Diligence Policy

结合供应链尽责管理的实际需要，旭日金属建立供应链尽责管理的体系，制定并批准实施包括《供应链尽责管理政策》《供应商行为守则》《供应链尽责管理申诉机制》等尽责管理文件。

In accordance with the practical requirements of supply chain due diligence, SNMI has established a supply chain due diligence system. The company has formulated and implemented due diligence documents including: *Supply Chain Due Diligence Policy*, *Supplier Code of Conduct* and *Supply Chain Due Diligence Grievance Mechanism*.

《供应链尽责管理政策》已公开发布，该政策符合第三版经合组织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(经合组织指南)。它涵盖了经合组织指南附录二中确定的所有风险，适用全球范围。公司承诺一经发现任何附录二风险，将立即处理。本政策经高阶管理层审查和批准，管理层致力于支持本政策的实施。本政策已向相关利益相关者（供应商、客户、员工等）广泛传播，可于公司网站查阅 (<https://www.walsin.com/our-business/resources-business/>)。

Among these, the Supply Chain Due Diligence Policy has been publicly released. This policy complies with *The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)* ("OECD Guidance"). The policy covers all risks identified in Annex II of the OECD Guidance and applies globally. The company commits to immediately addressing any Annex II risks upon identification. This policy has been reviewed and approved by senior management, who are committed to supporting its implementation. The policy has been widely disseminated to relevant stakeholders (suppliers, customers, employees, etc.) and is available on the company website.

随着企业运营、供应链、所在地政府政策要求与其他业务关系中出现的变化，公司会定期审阅和更新尽责管理的相关政策。

The company will periodically review and update its due diligence policies in response to changes in business operations, supply chains, local government policy requirements and other business relationships.

3.1.2. 供应链尽责管理委员会 Supply Chain Due Diligence Committee

旭日金属设立内部供应链尽责管理框架，成立供应链尽责管理委员会，委员会由主席以及委员组成，负责批准、监督实施、定期审阅、批准修订公司《供应链尽责管理政策》及其配套制度文件，定期监督并问责委员会中涉及部门有关供应链尽责管理的工作绩效，以确保尽责管理体系的持续改进。委员会下设尽责管理联合办公室，办公室成员单位为相关部门负责，开展跨部门协同工作，共同建立和完善公司的供应链尽责管理体系，提升公司供应链尽责管理能力。

SNMI has established an internal supply chain due diligence framework through the formation of a Supply Chain Due Diligence Committee, which is composed of a Chairperson and Committee Members. This committee is responsible for approving, overseeing the implementation of, conducting periodic reviews of, and authorizing revisions to the company's Supply Chain Due Diligence Policy and its supporting documents. It regularly monitors and evaluates the performance of relevant departments in fulfilling their supply chain due diligence obligations to ensure continuous improvement of the due diligence management system. Under the committee's supervision, a Joint Due

Diligence Office has been established with representation from relevant departments to facilitate cross-functional collaboration in developing and enhancing the company's supply chain due diligence framework while strengthening the organization's overall due diligence capabilities.

3.1.3. 供应链控制和透明度系统 Supply Chain Control and Transparency System

公司建立内部物料控制与追溯系统，以识别相应矿产供应链中的参与者、原产地、运输路线的信息，以及按照所在国法律法规的要求向政府进行税费信息的披露等信息。公司目前的原料来自于印度尼西亚。在建立控制和透明度系统的过程中，公司开展警示信号审查，一旦发现触发警示信号的情况，公司会进一步完善供应链控制和透明度系统，并按照指南建议，展开更为全面的供应链信息追溯。

The company has established an internal material control and traceability system designed to identify participants within the mineral supply chain, including origin information, transportation routes, and tax payment disclosures in compliance with host country laws and regulations. The company's current raw materials are sourced from Indonesia. During the development of this control and transparency system, the company conducts red flag reviews. Upon identification of any triggering circumstances, the system undergoes further refinement with enhanced supply chain traceability measures implemented in accordance with guideline recommendations.

此外，公司高度重视上游矿产供应链透明度，并响应采掘业透明度倡议（EITI）的原则。将其纳入公司《供应链尽责管理政策》中，且通过供应商培训及书面沟通等方式向供应商传达 EITI 的理念和期望。公司亦向相关供应商发送邮件，询问其 EITI 揭露情况，并鼓励其提升及响应 EITI 相关透明度工作。同时，公司也通过公开管道对上游矿山企业的 EITI 揭露情况进行查核。

在本报告编制时，公司可获取的最新印尼 EITI 公开报告涵盖至 2021 报告年度，并已查询到部分上游矿山企业的往年 EITI 相关揭露记录。供应商已就公司提出的相关要求作出积极回应，作为补充性的透明度控制措施，公司对每一批次接收的镍矿，均收集并留存供应商提交的印尼非税国家收入（PNBP）相关缴费证明，并将该文件作为供应链透明度和文件控制措施的一部分予以留存。

In addition, PT SNMI attaches great importance to transparency in the upstream mineral supply chain and supports the principles of the Extractive Industries Transparency Initiative (EITI). SNMI has incorporated support for EITI into its Supply Chain Due Diligence Policy and has communicated the concept and expectations of EITI to suppliers through training and written communications. SNMI has also sent emails to its suppliers to inquire about their EITI-related disclosure status and to encourage their support for transparency efforts. At the same time, SNMI has reviewed the EITI disclosure status of upstream mining companies through publicly available sources.

At the time of preparation of this report, the latest publicly available Indonesia EITI report covered the 2021 reporting year, and we have identified relevant EITI disclosure records from previous years for some of the upstream mining companies. Suppliers have responded positively to SNMI's requests. As a supplementary transparency control measure, for each batch of nickel ore received, SNMI collects and retains proof of payment of Indonesian non-tax state revenue (PNBP) submitted by suppliers, as part of its supply chain transparency and document control measures.

表 1：供应链追溯信息

Table 1: Supply Chain Traceability Information

开展“警示信号审查”需搜集以下 1-5 项信息；

For conducting Red Flag Reviews, the following information items 1 - 5 must be collected.

对于触发“警示信号”的供应商需搜集以下 1-12 项信息：

For suppliers triggering Red Flags, the following information items 1 - 12 must be obtained:

1. 原料来源国和地区；
Country/region of mineral origin
2. 上游参与者的名字和地址，包括矿区、当地贸易商、仓库、交易市场、冶炼厂、出口商、国际贸易商等；
Names and addresses of upstream participants, including mining sites, local traders, warehouses, trading markets, smelters, exporters, and international traders
3. 运输路线和运输方式；
Transportation routes and methods
4. 矿产或金属的商品名和类型；
Names and types of minerals/metals

5. 收集直接供应商和其他已知上游企业的所有权信息（包括实益所有信息）
Ownership information (including beneficial ownership) of direct suppliers and other known upstream entities
6. 为矿产开采、贸易、运输、出口而向政府支付的税金、费用或特许权使用费；
Taxes, fees, or royalties paid to governments for mineral mining, trading, transportation, or export
7. 为矿产开采、贸易、运输、出口而向政府官员支付的任何其他款项；
Any other payments made to government officials for mineral mining, trading, transportation, or export
8. 自矿产开采开始，在供应链中所有环节向公共或私人安全部队或其他团体支付的所有税款和任何其他款项；
All taxes and any other payments made to public/private security forces or other groups throughout the supply chain since mining commencement
9. 出口商的所有权（包括受益所有权）和公司架构，包括公司管理人员和董事的姓名，以及其与政府或军队的隶属关系；
Exporter's ownership (including beneficial ownership) and corporate structure, including names of company officers and directors, their affiliations with government or military entities
10. 矿山、开采量、日期和开采方式（例如手工和中小规模采矿或大规模采矿）；
Mine locations, production volumes, dates, and extraction methods (e.g., artisanal/small-scale mining or large-scale mining)
11. 矿产交易、冶炼、出口的地点；
Locations of mineral trading, smelting, and export
12. 冶炼厂、贸易商的出口和进口文件。
Export/import documentation from smelters and traders

3.1.4. 加强与供应商的合作 Strengthening Supplier Collaboration

公司提倡与供应商建立长期稳定的合作关系，建立与供应商常态的沟通机制，提高供应商履行负责任采购的意识，推动负责任供应链的建设。

The company promotes the establishment of long-term, stable cooperative relationships with suppliers by implementing regular communication mechanisms. This approach enhances suppliers' awareness of responsible sourcing practices and advances the development of a responsible supply chain.

公司将尽责管理的要求纳入供应商行为守则，向一级供应商传达公司供应链尽责管理政策及供应商行为守则，确认供应商遵守与公司供应链尽责管理政策一致的供应商政策。公司在合作前也要求供应商填报《了解你的供应商》问卷，查核原料的来源并进行追溯评估，将尽责管理纳入到供应商合法合规要求，以增加对供应商的影响力。公司目前没有触发警示信号的供应商，但若将来一旦发现触发警示信号的供应商，公司将采取强化版尽责管理，开展实地评估，确认相关供应商的风险状况。

We have integrated due diligence requirements into our Supplier Code of Conduct and formally communicated both our Supply Chain Due Diligence Policy and Supplier Code of Conduct to Tier 1 suppliers. These suppliers shall confirm their compliance with policies aligned with our Supply Chain Due Diligence Policy. Prior to engagement, all suppliers are required to complete a "Know Your Supplier" questionnaire, enabling verification of material origins and traceability assessments. Due diligence has been incorporated as a compliance requirement for suppliers, thereby strengthening our influence over their practices. While no suppliers currently trigger red flags, should any be identified in the future, the company will implement enhanced due diligence

measures, including on-site assessments to verify the risk status of affected suppliers.

公司通过日常沟通交流、开展线上培训等多种形式，与供应商一起对供应链风险进行识别、预防和缓解，共同构建负责任采购供应链。

Through ongoing communication channels and comprehensive on-line training programs, we collaborate with suppliers to identify, prevent, and mitigate supply chain risks. This joint effort supports our shared commitment to building a responsible sourcing supply chain.

3.1.5. 申诉机制 Grievance Mechanism

公司充分尊重利益相关方的诉求，并深知与其建立沟通管道的重要性。为了及时识别和处理供应链可能存在的助长冲突或人权侵害等风险，保障内外部利益相关方与本公司的顺畅沟通，公司建立了申诉机制并制定了详尽的《供应链尽责管理申诉机制》。

The company fully respects the concerns of stakeholders and recognizes the critical importance of establishing effective communication channels. To promptly identify and address potential risks in the supply chain—including those related to conflict financing or human rights violations—and to ensure smooth communication between internal/external stakeholders and the company, we have established a grievance mechanism and developed a detailed Supply Chain Due Diligence Grievance Mechanism.

申诉机制提供了内外部利益相关方表达期望与诉求的管道，同时也是建立尽责管理体系必不可少的组成部分。所有相关方均可通过申诉机制向公司反映存在的合理诉求，在任何情况下，我们均保证以独立、公正和客观的方式处理、调查、回复并归档所接收的申诉资料。申诉资讯将作为风险识别与评估的输入，并在必要时启动加强尽责调查。

The grievance mechanism serves as a vital channel for stakeholders to voice expectations and concerns, while also constituting an essential component of our due diligence management system. All relevant parties may submit legitimate grievances through this mechanism. We guarantee that all received grievances will be processed, investigated, responded to, and archived with strict independence, impartiality, and objectivity under all circumstances. Grievance information will be used as an input for risk identification and assessment, and will trigger enhanced due diligence where necessary.

申诉途径已经在官网上公布，各相关方可查询。截止报告完成日，公司尚未收到申诉。

The grievance channel has been publicly disclosed on the company's official website for stakeholder reference. As of the report completion date, no grievances have been received.

3.1.6. 意识和能力提升 Awareness and Capacity Building

公司定期开展矿产供应链尽责管理培训，邀请内部培训师或者外部专家开展尽责管理体系的培训，举办供应链尽责管理、风险管控等相关专题的培

训，提升公司上下整体供应链尽责管理水准，并对开展的培训活动进行培训记录留存。

The company regularly conducts due diligence management training for the mineral supply chain, inviting internal trainers or external experts to deliver training on the due diligence management system. Specialized training sessions on supply chain due diligence, risk management, and related topics are organized to enhance the overall supply chain due diligence management capabilities across the company. All training activities conducted are documented using a standardized training record template for archiving purposes.



图 1：公司参与供应链尽责管理培训

Figure 1: Company Participation in Supply Chain Due Diligence Management Training

3.1.7. 记录保留系统 Record Retention System

在公司内部，所有与尽责管理相关的档案与记录至少保留五年，要求正确使用且通过正式的文档管理与保存系统进行分类归档和维护。

Within the company, all documents and records related to due diligence management shall be retained for a minimum of five years. These records must be properly utilized, systematically categorized, and maintained through a formal document management and archival system.

3.2. 步骤二：风险识别和评估 Step 2: Risk Identification and Assessment

公司开展警示信号审查，并制定《“受冲突影响和高风险区域(CAHRAs)”识别程序》，对开采、加工和出口的相关风险进行识别和评估，并根据审查结果确认供应链风险识别的范围。

The company conducts red flag reviews and establishes the "Conflict-Affected and High-Risk Areas (CAHRAs) Identification Procedure" to identify and assess risks associated with mining, processing, and export activities. Based on the review findings, the scope of supply chain risk identification is determined.

表 2：三类警示信号

Table 2: Three Categories of Red Flags

<p>矿产来源地和运输路线警示信号</p> <p>Red Flags Locations of mineral origin and transit</p>	<p>1. 矿产来自于“受冲突影响和高风险区域”（CAHRAs）； The mineral originates from a conflict-affected and high-risk area;</p> <p>2. 矿产运输路线经过“受冲突影响和高风险区域”； The transportation route of the mineral passes a conflict-affected and high-risk area;</p> <p>3. 矿产原产国为已知储存、预估储量或预期生产水准有限的国家（即宣称的来自该国的矿产的产量与其已知储量或预期生产水准不符）； The mineral is claimed to originate from a country that has limited known reserves or stocks, likely resources or expected production levels (i.e., the declared volumes of mineral from that country are out of keeping with its known reserves or expected production levels)</p>
	<p>4. 矿产原产国实际上只是“受冲突影响和高风险区域”的中转国； The mineral is claimed to originate from a country which is actually a country through which mineral from conflict-affected and high-risk areas;</p> <p>5. 矿产来自多个回收管道，且在“受冲突影响或高风险区域”进行加工； The mineral is claimed to originate from mixed recyclable sources and has been processed in conflict-affected and high-risk areas.</p>
<p>供应商警示信号</p> <p>Supplier red flag</p>	<p>1. 供应商或其他上游企业在出现上述警示信号的地区开展经营活动，或是上述地区供应商的股东，或与之存在利益关系； Suppliers or other known upstream companies operate in above-mentioned red flag locations, or have shareholder or other interests in suppliers from above mentioned red flag locations;</p> <p>2. 获知供应商或其他上游企业在过去十二个月内曾经从示警矿源地和中转地采购过矿产。 Suppliers or other upstream companies are known to have sourced mineral from a red flag location of origin and transit in the last 12 months.</p>

<p>特定情况下的警示信号</p> <p>Circumstantial red flag</p>	<p>1. 收集资讯识别异常情况，判断与矿产有关的活动是否有可能助长冲突或者其他侵犯权利的行为；</p> <p>Anomalies or unusual circumstances are identified through the information collected which give rise to a reasonable suspicion that mineral may contribute to conflict or other serious abuses associated with mineral relevant activities;</p> <p>2. 无法判定矿产原产国和中转国的情况。</p> <p>Not be able to identify the mineral's location of origin and transit.</p>
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一旦在警示信号审查过程中发现警示信号，企业需对相应供应链的实际情况进行实地评估，启动强化版的尽责管理。

Upon identification of red flags during the red flag review process, the company shall conduct an on-the-ground assessment of the relevant supply chain and initiate enhanced due diligence management.

公司目前供应链并未触发警示信号，但为应对可能的供应链变化，公司制定了《警示信号识别与风险评估程序》，一旦将来供应链发生变化需要展开实地评估，公司将参考《OECD 指南：上游企业风险评估指导》进行实地评估事项。

Although no red flags have been triggered in the current supply chain, the company has established the Red Flag Identification and Risk Assessment Procedure to prepare for potential supply chain changes. Should future supply chain modifications necessitate an on-site assessment, the company will refer to *the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Guidance for Upstream Companies* to conduct the assessment.

表 3：CAHRAs 程序参考的部分资料

Table 3: Reference Materials for CAHRAs Procedure

为了提高“受冲突影响和高风险地区”识别评估的客观性，公司每年定期开展一次 CAHRAs 识别；在供应链中的国家/地区发生动态变化，或者在出现突发事件或风险信号时，即时启用程序进行 CAHRAs 的动态识别。

To enhance the objectivity of identifying and assessing Conflict-Affected and High-Risk Areas (CAHRAs), the company conducts an annual CAHRAs identification process. Additionally, the procedure is activated immediately when dynamic changes occur in the countries/regions within the supply chain; or emerging incidents or risk indicators are detected.

我们的评估同时参考了外部权威机构的公开信息，包括但不限于

Our assessment incorporates reference materials from authoritative external sources, including but not limited to:

◆ 欧盟受冲突影响和高风险地区清单

EU List of Conflict-Affected and High-Risk Areas (CAHRAs) :

<https://www.cahraslist.net/cahras>

◆ 《多德-弗兰克法案》第 1502 条

Section 1502 of the Dodd-Frank Act :

<https://secsearch.sec.gov/search?query=adjoining+country&utf8=%3F&affiliate=secsearch>

◆ 海德堡国际冲突研究所“冲突晴雨表”

Heidelberg Institute for International Conflict Research (HIIK) "Conflict Barometer" :

<https://hiik.de/conflict-barometer/current-version/?lang=en>

◆ 世界银行“世界治理指数”

World Bank "Worldwide Governance Indicators" (WGI) :

<https://www.worldbank.org/en/publication/worldwide-governance-indicators>

◆ 联合国人类发展指数

United Nations Human Development Index (HDI) :

<https://hdr.undp.org/data-center/specific-country-data#/countries/IDN>

旭日金属实施了解你的供应商 (KYS) 程序，要求现有和潜在供应商提供包括公司基本资讯、最终受益所有人、原料来源国及是否涉及高风险区域等资讯。KYS 的收集与验证有助于识别潜在合法合规、人权或产地风险，为后续风险评估和分类管理提供依据。本公司要求供应商提供完善的 KYS 问卷，如果不完善的公司将要求供应商继续完善；连续三次要求都不能获得完整资讯的，向公司高层汇报进行升级管理。在本报告期间，没有发现与所提交的 KYS 表格相关的警示信号。

SNMI has implemented a Know Your Supplier (KYS) procedure that requires both existing and potential suppliers to provide comprehensive information including company details, ultimate beneficial owners, countries of mineral origin, and potential connections to high-risk areas. The collection and verification of KYS data facilitates the identification of potential compliance, human rights, or origin-related risks, serving as the foundation for subsequent risk assessment and classification management. The company mandates suppliers to complete KYS questionnaires thoroughly. In cases of incomplete submissions, suppliers are required to provide supplementary information. Suppliers that fail to provide complete information after three consecutive requests will be escalated to senior management for further action. During this reporting period, no red flags relevant to KYS documentation were identified.

公司对照 CAHRAs、KYS 问卷、制裁清单、当地法律和内部采购要求审查所收集的资讯，从而识别供应链中的所有风险。

The company systematically cross-references all collected information against CAHRAs designations, KYS questionnaires, sanctions lists, local legal requirements, and internal procurement standards to comprehensively identify potential risks throughout the supply chain. This rigorous verification process ensures thorough risk assessment and management.

3.3. 步骤三：设计并实施应对风险的策略 Step 3 Design & Implement Strategy to Respond to Risks

3.3.1. 风险预防 Risk Prevention

旭日金属建立了“风险预防为主”的原则，这一原则体现在全面的内控措施上。内控措施具体包括一系列控制程序，例如《禁止使用强迫劳动管理程序》、《禁止使用童工和补救控制程序》《非国家武装力量及其关联方的识别过程》等，帮助公司部门具体实施和执行矿产供应链尽责管理。

SNMI has established a "risk prevention first" principle, which is reflected in comprehensive internal control measures. These measures include a series of control procedures, such as the Prohibition of Forced Labor Management Procedure, the Prohibition of Child Labor and Remediation Control Procedure, and the Identification Process for Non-State Armed Groups and Related Parties, among others. These procedures assist company departments in the concrete implementation and execution of mineral supply chain due diligence management.

3.3.2. 风险应对方法 Risk response approach

报告期内未识别到任何风险或事件。在实际生产运营的过程中，一旦识别出潜在供应链风险，我们将进行事实调查，并将调查结果提报供应链尽责管理委员会和高阶管理层，依据《风险管理程序》启动风险缓解措施，明确处置路径、责任分工与完成时程，推动风险应对与改善追踪落实。

No risks or incidents were identified in the reporting period. During actual production and operations, once a potential supply chain risk is identified, we will investigate the facts and report the investigation results to the Supply Chain Due Diligence Committee and senior management. In accordance with the Risk Management Procedure, we will initiate risk mitigation measures, clarify the response pathway, assign responsibilities, and set completion timelines, and drive the closure of risk response and corrective actions.

表 4：风险缓解策略

Table 4: Risk Mitigation Strategies

风险缓解策略 Risk Mitigation Strategies
1. 在缓解重大风险的过程中继续交易 continuing trade throughout the course of major risk mitigation efforts ;
2. 在持续缓解重大风险的过程中暂时中止交易 temporarily suspending trade while pursuing ongoing major risk mitigation ;
3. 如果缓解风险的努力失败，或企业认为无法缓解风险，或风险无法接受，则终止和供应商的合作关系。 disengaging with a supplier in cases where mitigation measures fail or mitigation appears not feasible or unacceptable.

在此基础上，公司将依据《风险管理计划管理程序》制定、审批并实施《风险管理计划》，对风险缓解措施的执行进度与有效性开展定期核查与追踪；如风险情势发生重大变化或出现新增资讯，将及时对风险管理方案进行修订完善，并持续开展风险监测及必要的补充评估，确保风险得到有效控制与缓解。同时，公司将持续与供应链相关利益相关方沟通协作，共同推动风险缓解措施落实并取得实效。

On this basis, the Company will, in accordance with the Risk Management Plan Management Procedure, develop, approve, and implement a Risk Management Plan, and conduct periodic verification and follow-up on the progress and effectiveness of the risk mitigation measures. If there are significant changes in the risk situation or new information emerges, we will promptly revise and improve the risk management approach, and continue risk monitoring and any necessary supplementary assessments to ensure that risks are effectively controlled and mitigated. At the same time, the Company will continue to communicate and collaborate with relevant supply chain stakeholders to jointly promote the implementation and effectiveness of risk mitigation measures.

3.4. 步骤四：开展独立第三方评估 Step 4 Independent 3rd party assessment

我们高度重视每场审核和评估，总结问题和风险，制定改进计画并监督实施效果，提高供应链尽责管理绩效表现。

We attach high importance to every audit and assessment, systematically identifying issues and risk points, developing corrective action plans, and monitoring implementation effects to enhance supply chain due diligence performance.

公司正在积极筹备参与责任矿产倡议（RMI）的负责任矿产保证程序（RMAP）审验，回应矿产供应链尽责管理的要求，满足利益相关方对供应链合法合规、透明的期待。

The company is actively preparing to participate in the Responsible Minerals Assurance Process (RMAP) under the Responsible Minerals Initiative (RMI). This demonstrates our commitment to meeting due diligence requirements for mineral supply chains and fulfilling stakeholder expectations for compliance and transparency.

3.5. 步骤五：年度供应链尽责管理报告 Step 5 Report Annually on Supply Chain Due Diligence

发布供应链尽责管理报告是与利益相关方增进了解与信任的有效途径。公司定期更新并公开尽责管理报告，各相关方可查阅年度《供应链尽责管理报告》。我们诚挚欢迎各界对我司供应链尽责管理工作提出建议。

Publishing a Supply Chain Due Diligence Report serves as an effective means to enhance understanding and build trust with stakeholders. The company regularly updates and publicly discloses reports on its due diligence efforts, with the annual Supply Chain Due Diligence Report accessible to all relevant parties. We sincerely welcome feedback and suggestions from all sectors regarding our supply chain due diligence practices.

报告由供应链尽责管理联合办公室负责并偕同各个业务部门参与共同编制，报告大纲、内容、资料均应由管理部门和业务部门共同确定或收整，多部门参与对于供应链合规进展报告的实质性、有效性、可信度发挥关键的作用。

The report is led by the Joint Office for Supply Chain Due Diligence, with participation from various business units in its preparation. The report outline, content, and supporting materials are jointly determined and collected by management and operational departments. Multi-departmental involvement plays a critical role in ensuring the materiality, effectiveness, and credibility of the compliance progress report.

按照负责任矿产保证程序（RMAP），并参考《OECD 指南》，报告重点
陈述公司尽责管理体系建设和实践的内容，以推动必要的信息公开、提高
供应链透明度。

In accordance with the Responsible Minerals Assurance Process (RMAP) and
referencing the OECD Due Diligence Guidance, the report focuses on the
company's due diligence management system development and practical
implementation, aiming to promote necessary transparency and improve supply
chain visibility.

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