



Supply Chain Due Diligence Report

PT Sunny Metal Industry

旭日金屬工業有限公司

供應鏈盡責管理報告

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1. 報告說明 Preparation Instructions

編制主體 Reporting Entity

旭日金屬工業有限公司（SNMI），為了便於表述和方便閱讀，在本報告中也以“旭日金屬”、“公司”或“我們”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.

編制範圍 Reporting Scope

本報告包含公司鎳供應鏈盡責管理體系建設、風險識別與評估、風險預防和緩解、獨立第三方外部評估、報告等盡責管理步驟內容。相關資訊和數據主要涵蓋 2025 年 3 月 1 日-2026 年 2 月 28 日公司展開的各項供應鏈盡責管理工作。

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.

編制依據 Basis of Preparation

公司根據經濟合作與發展組織（OECD）發佈的《關於來自受衝突影響和高風險區域的礦石的負責任供應鏈盡職調查指南（第三版）》、責任礦產倡議（RMI）的負責任礦產保證程序（RMAP）、《聯合國指導原則報告框架》等進行編制。

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*.

發佈週期 Reporting Frequency

公司供應鏈盡責管理報告每年發佈一次，相關方可公開查閱報告進展。公司將定期更新報告，我們誠摯歡迎各界對我司供應鏈盡責管理工作提出建議和意見。

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. 關於我們 About Us

公司名稱	旭日金屬工業有限公司
Company Name	PT Sunny Metal Industry
公司地址	印尼緯達貝工業園區，中哈馬黑拉縣
Company Address	Indonesia Weda Bay Industrial Park, Central Halmahera
RMAP CID 編號	CID005496
RMAP CID No.	CID005496

公司簡介 Corporate Overview

PT. Sunny Metal Industry 於 2021 年 8 月設立，2022 年 1 月開始建設，於 2023 年 Q1 全產，生產基地位於印尼緯達貝工業園區，含 4 條冰鎳/RKEF 生產線之鎳鐵廠，擁有四座 60,000KVA 礦熱爐、四座迴轉窯、四座乾燥窯，一座風淬鎳處理系統，原料為紅土鎳礦，主要產品為鎳生鐵及低冰鎳。生產能力為年產能 5.5 萬鎳金屬噸。

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.

報告期間 2025年3月1日-2026年2月28日

Reporting Period March 1, 2025 - February 28, 2026

3. 供應鏈盡責管理實踐 Responsible Supply Chain

Management Practices

本章為旭日金屬工業有限公司在本報告週期（2025年3月1日-2026年2月28日）開展的供應鏈盡責管理實踐工作的簡要概述，內容包括礦產供應鏈盡責管理的五個步驟。

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. 步驟一：建立盡責管理體系 Step 1 : Establish a Due Diligence

Management System

3.1.1. 供應鏈盡責管理政策 Supply Chain Due Diligence Policy

結合供應鏈盡責管理的實際需要，旭日金屬建立供應鏈盡責管理的體系，制定並批准實施包括《供應鏈盡責管理政策》《供應商行為守則》《供應鏈盡責管理申訴機制》等盡責管理文件。

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*.

《供應鏈盡責管理政策》已公開發佈，該政策符合第三版經合組織關於來自受衝突影響和高風險區域的礦石的負責任供應鏈盡職調查指南(經合組織指南)。它涵蓋了經合組織指南附錄二中確定的所有風險，適用全球範圍。公司承諾一經發現任何附錄二風險，將立即處理。本政策經高階管理層審查和批准，管理層致力於支持本政策的實施。本政策已向相關利益相關者(供應商、客戶、員工等)廣泛傳播，可於公司網站查閱(<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.

隨著企業運營、供應鏈、所在地政府政策要求與其他業務關係中出現的變化，公司會定期審閱和更新盡責管理的相關政策。

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. 供應鏈盡責管理委員會 Supply Chain Due Diligence Committee

旭日金屬設立內部供應鏈盡責管理框架，成立供應鏈盡責管理委員會，委員會由主席以及委員組成，負責批准、監督實施、定期審閱、批准修訂公司《供應鏈盡責管理政策》及其配套制度文件，定期監督並問責委員會中涉及部門有關供應鏈盡責管理的工作績效，以確保盡責管理體系的持續改進。委員會下設盡責管理聯合辦公室，辦公室成員單位為相關部門負責，開展跨部門協同工作，共同建立和完善公司的供應鏈盡責管理體系，提升公司供應鏈盡責管理能力。

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. 供應鏈控制和透明度系統 Supply Chain Control and Transparency System

公司建立內部物料控制與追溯系統，以識別相應礦產供應鏈中的參與者、原產地、運輸路線的資訊，以及按照所在國法律法規的要求向政府進行稅費資訊的披露等資訊。公司目前的原料來於印尼。在建立控制和透明度系統的過程中，公司開展警示信號審查，一旦發現觸發警示信號的情況，公司會進一步完善供應鏈控制和透明度系統，並按照指南建議，展開更為全面的供應鏈資訊追溯。

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，公司高度重視上游礦產供應鏈透明度，並響應採掘業透明度倡議（EITI）的原則。將其納入公司《供應鏈盡責管理政策》中，且通過供應商培訓及書面溝通等方式向供應商傳達 EITI 的理念和期望。公司亦向相關供應商發送郵件，詢問其 EITI 揭露情況，並鼓勵其提升及響應 EITI 相關透明度工作。同時，公司也通過公開管道對上游礦山企業的 EITI 揭露情況進行查核。

在本報告編制時，公司可獲取的最新印尼 EITI 公開報告涵蓋至 2021 報告年度，並已查詢到部分上游礦山企業的往年 EITI 相關揭露記錄。供應商已就公司提出的相關要求作出積極回應，作為補充性的透明度控制措施，公司對每一批次接收的鎳礦，均收集並留存供應商提交的印尼非稅國家收入（PNBP）相關繳費證明，並將該文件作為供應鏈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：供應鏈追溯資訊

Table 1: Supply Chain Traceability Information

開展“警示信號審查”需搜集以下 1-5 項資訊；

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

對於觸發“警示信號”的供應商需搜集以下 1-12 項資訊：

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

1. 原料來源國和地區；
Country/region of mineral origin
2. 上游參與者的名字和地址，包括礦區、當地貿易商、倉庫、交易市場、冶煉廠、出口商、國際貿易商等；
Names and addresses of upstream participants, including mining sites, local traders, warehouses, trading markets, smelters, exporters, and international traders
3. 運輸路線和運輸方式；
Transportation routes and methods
4. 礦產或金屬的商品名和類型；
Names and types of minerals/metals

5. 收集直接供應商和其他已知上游企業的所有權資訊（包括實益所有資訊）
Ownership information (including beneficial ownership) of direct suppliers and other known upstream entities
6. 為礦產開採、貿易、運輸、出口而向政府支付的稅金、費用或特許權使用費；
Taxes, fees, or royalties paid to governments for mineral mining, trading, transportation, or export
7. 為礦產開採、貿易、運輸、出口而向政府官員支付的任何其他款項；
Any other payments made to government officials for mineral mining, trading, transportation, or export
8. 自礦產開採開始，在供應鏈中所有環節向公共或私人安全部隊或其他團體支付的所有稅款和任何其他款項；
All taxes and any other payments made to public/private security forces or other groups throughout the supply chain since mining commencement
9. 出口商的所有權（包括受益所有權）和公司架構，包括公司管理人員和董事的姓名，以及其與政府或軍隊的隸屬關係；
Exporter's ownership (including beneficial ownership) and corporate structure, including names of company officers and directors, their affiliations with government or military entities
10. 礦山、開採量、日期和開採方式（例如手工和中小規模採礦或大規模採礦）；
Mine locations, production volumes, dates, and extraction methods (e.g., artisanal/small-scale mining or large-scale mining)
11. 礦產交易、冶煉、出口的地點；
Locations of mineral trading, smelting, and export
12. 冶煉廠、貿易商的出口和進口文件。
Export/import documentation from smelters and traders

3.1.4. 加強與供應商的合作 Strengthening Supplier Collaboration

公司提倡與供應商建立長期穩定的合作關係，建立與供應商常態的溝通機制，提高供應商履行負責任採購的意識，推動負責任供應鏈的建設。

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.

公司將盡責管理的要求納入供應商行為守則，向一級供應商傳達公司供應鏈盡責管理政策及供應商行為守則，確認供應商遵守與公司供應鏈盡責管理政策一致的供應商政策。公司在合作前也要求供應商填報《瞭解你的供應商》問卷，查核原料的來源並進行追溯評估，將盡責管理納入到供應商合法合規要求，以增加對供應商的影響力。公司目前沒有觸發警示信號的供應商，但若將來一旦發現觸發警示信號的供應商，公司將採取強化版盡責管理，開展實地評估，確認相關供應商的風險狀況。

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.

公司通過日常溝通交流、開展線上培訓等多種形式，與供應商一起對供應鏈風險進行識別、預防和緩解，共同構建負責任採購供應鏈。

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. 申訴機制 Grievance Mechanism

公司充分尊重利益相關方的訴求，並深知與其建立溝通管道的重要性。為了及時識別和處理供應鏈可能存在的助長衝突或人權侵害等風險，保障內外部利益相關方與本公司的順暢溝通，公司建立了申訴機制並制定了詳盡的《供應鏈盡責管理申訴機制》。

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.

申訴機制提供了內外部利益相關方表達期望與訴求的管道，同時也是建立盡責管理體系必不可少的組成部分。所有相關方均可通過申訴機制向公司反映存在的合理訴求，在任何情況下，我們均保證以獨立、公正和客觀的方式處理、調查、回復並歸檔所接收的申訴資料。申訴資訊將作為風險識別與評估的輸入，並在必要時啟動加強盡責調查。

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.

申訴途徑已經在官網上公佈，各相關方可查詢。截止報告完成日，公司尚未收到申訴。

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. 意識和能力提升 Awareness and Capacity Building

公司定期開展礦產供應鏈盡責管理培訓，邀請內部培訓師或者外部專家開展盡責管理體系的培訓，舉辦供應鏈盡責管理、風險管控等相關專題的培

訓，提升公司上下整體供應鏈盡責管理水準，並對開展的培訓活動進行培訓記錄留存。

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.



圖 1：公司參與供應鏈盡責管理培訓

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

3.1.7. 記錄保留系統 Record Retention System

在公司內部，所有與盡責管理相關的檔案與記錄至少保留五年，要求正確使用且通過正式的文檔管理與保存系統進行分類歸檔和維護。

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. 步驟二：風險識別和評估 Step 2: Risk Identification and Assessment

公司開展警示信號審查，並制定《“受衝突影響和高風險區域(CAHRAs)”識別程序》，對開採、加工和出口的相關風險進行識別和評估，並根據審查結果確認供應鏈風險識別的範圍。

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 2：三類警示信號

Table 2: Three Categories of Red Flags

<p>礦產來源地和運輸路線警示信號</p> <p>Red Flags Locations of mineral origin and transit</p>	<p>1. 礦產來自於“受衝突影響和高風險區域”（CAHRAs）； The mineral originates from a conflict-affected and high-risk area;</p> <p>2. 礦產運輸路線經過“受衝突影響和高風險區域”； The transportation route of the mineral passes a conflict-affected and high-risk area;</p> <p>3. 礦產原產國為已知儲存、預估儲量或預期生產水準有限的國家（即宣稱的來自該國的礦產的產量與其已知儲量或預期生產水準不符）； The mineral is claimed to originate from a country that has limited known reserves or stocks, likely resources or expected production</p>
	<p>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. 礦產原產國實際上只是“受衝突影響和高風險區域”的中轉國； 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. 礦產來自多個回收管道，且在“受衝突影響或高風險區域”進行加工； The mineral is claimed to originate from mixed recyclable sources and has been processed in conflict-affected and high-risk areas.</p>
<p>供應商警示信號</p> <p>Supplier red flag</p>	<p>1. 供應商或其他上游企業在出現上述警示信號的地區開展經營活動，或是上述地區供應商的股東，或與之存在利益關係； 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. 獲知供應商或其他上游企業在過去十二個月內曾經從示警礦源地和中轉地採購過礦產。 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>特定情況下的警 示信號</p> <p>Circumstantial red flag</p>	<p>1. 收集資訊識別異常情況，判斷與礦產有關的活動是否有可能助長衝突或者其他侵犯權利的行為；</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. 無法判定礦產原產國和中轉國的情況。</p> <p>Not be able to identify the mineral's location of origin and transit.</p>
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一旦在警示信號審查過程中發現警示信號，企業需對相應供應鏈的實際情況進行實地評估，啟動強化版的盡責管理。

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.

公司目前供應鏈並未觸發警示信號，但為應對可能的供應鏈變化，公司制定了《警示信號識別與風險評估程序》，一旦將來供應鏈發生變化需要展開實地評估，公司將參考《OECD 指南：上游企業風險評估指導》進行實地評估事項。

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 程序參考的部分資料

Table 3: Reference Materials for CAHRAs Procedure

為了提高“受衝突影響和高風險地區”識別評估的客觀性，公司每年定期開展一次 CAHRAs 識別；在供應鏈中的國家/地區發生動態變化，或者在出現突發事件或風險信號時，即時啟用程序進行 CAHRAs 的動態識別。

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.

我們的評估同時參考了外部權威機構的公開信息，包括但不限於

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

◆ 歐盟受衝突影響和高風險地區清單

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

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

◆ 《多德-弗蘭克法案》第 1502 條

Section 1502 of the Dodd-Frank Act :

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

◆ 海德堡國際衝突研究所“衝突晴雨表”

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

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

◆ 世界銀行“世界治理指數”

World Bank "Worldwide Governance Indicators" (WGI) :

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

◆ 聯合國人類發展指數

United Nations Human Development Index (HDI) :

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

旭日金屬實施瞭解你的供應商 (KYS) 程序，要求現有和潛在供應商提供包括公司基本資訊、最終受益所有人、原料來源國及是否涉及高風險區域等資訊。KYS 的收集與驗證有助於識別潛在合法合規、人權或產地風險，為後續風險評估和分類管理提供依據。本公司要求供應商提供完善的 KYS 問卷，如果不完善的公司將要求供應商繼續完善；連續三次要求都不能獲得完整資訊的，向公司高層彙報進行升級管理。在本報告期間，沒有發現與所提交的 KYS 表格相關的警示信號。

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.

公司對照 CAHRAs、KYS 問卷、制裁清單、當地法律和內部採購要求審查所收集的資訊，從而識別供應鏈中的所有風險。

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. 步驟三：設計並實施應對風險的策略 Step 3 Design & Implement Strategy to Respond to Risks

3.3.1. 風險預防 Risk Prevention

旭日金屬建立了“風險預防為主”的原則，這一原則體現在全面的內控措施上。內控措施具體包括一系列控制程序，例如《禁止使用強迫勞動管理程序》、《禁止使用童工和補救控制程序》《非國家武裝力量及其關聯方的識別過程》等，幫助公司部門具體實施和執行礦產供應鏈盡責管理。

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. 風險應對方法 Risk response approach

報告期間內未識別到任何風險或事件。在實際生產運營的過程中，一旦識別出潛在供應鏈風險，我們將進行事實調查，並將調查結果提報供應鏈盡責管理委員會和高階管理層，依據《風險管理程序》啟動風險緩解措施，明確處置路徑、責任分工與完成時程，推動風險應對與改善追蹤落實。

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：風險緩解策略

Table 4: Risk Mitigation Strategies

風險緩解策略 Risk Mitigation Strategies
1. 在緩解重大風險的過程中繼續交易 continuing trade throughout the course of major risk mitigation efforts ;
2. 在持續緩解重大風險的過程中暫時中止交易 temporarily suspending trade while pursuing ongoing major risk mitigation ;
3. 如果緩解風險的努力失敗，或企業認為無法緩解風險，或風險無法接受，則終止和供應商的合作關係。 disengaging with a supplier in cases where mitigation measures fail or mitigation appears not feasible or unacceptable.

在此基礎上，公司將依據《風險管理計畫管理程序》制定、審批並實施《風險管理計畫》，對風險緩解措施的執行進度與有效性開展定期核查與追蹤；如風險情勢發生重大變化或出現新增資訊，將及時對風險管理方案進行修訂完善，並持續開展風險監測及必要的補充評估，確保風險得到有效控制與緩解。同時，公司將持續與供應鏈相關利益相關方溝通協作，共同推動風險緩解措施落實並取得實效。

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. 步驟四：開展獨立第三方評估 Step 4 Independent 3rd party assessment

我們高度重視每場審核和評估，總結問題和風險，制定改進計畫並監督實施效果，提高供應鏈盡責管理績效表現。

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.

公司正在積極籌備參與責任礦產倡議（RMI）的負責任礦產保證程序（RMAP）審驗，回應礦產供應鏈盡責管理的要求，滿足利益相關方對供應鏈合法合規、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. 步驟五：年度供應鏈盡責管理報告 Step 5 Report Annually on Supply Chain Due Diligence

發佈供應鏈盡責管理報告是與利益相關方增進瞭解與信任的有效途徑。公司定期更新並公開盡責管理報告，各相關方可查閱年度《供應鏈盡責管理報告》。我們誠摯歡迎各界對我司供應鏈盡責管理工作提出建議。

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.

報告由供應鏈盡責管理聯合辦公室負責並偕同各個業務部門參與共同編制，報告大綱、內容、資料均應由管理部門和業務部門共同確定或收整，多部門參與對於供應鏈合規進展報告的實質性、有效性、可信度發揮關鍵的作用。

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.

按照負責任礦產保證程序（RMAP），並參考《OECD 指南》，報告重點陳述公司盡責管理體系建設和實踐的內容，以推動必要的資訊公開、提高供應鏈透明度。

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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