TCL Zhonghuan Renewable Energy Technology Co., Ltd.

Sustainable Product Management Policy

1. Introduction

TCL Zhonghuan Renewable Energy Technology Co., Ltd. and its subsidiaries (hereinafter referred to as “TCL Zhonghuan”, “we” or “the Company”) are committed to driving high-quality development through innovation. With the R&D of clean energy products and green production as our core levers, we are building a closed-loop green ecosystem spanning green design, low-carbon manufacturing and zero-carbon delivery, and delivering green products and low-carbon solutions across all application scenarios, so as to support the green, low-carbon and sustainable development of the entire PV new energy industry chain.

We are keenly aware that, while PV products supply society with clean energy, every stage of their life cycle, including raw material extraction, manufacturing, transportation, use and recycling, also has far-reaching environmental and social impacts. The Company therefore solemnly commits to deeply embedding the philosophy of sustainable development into product lifecycle management, systematically reducing negative impacts and continuously enhancing positive contributions, and working with stakeholders worldwide to advance the green and high-quality development of the PV industry.

2. Scope

This Policy applies to TCL Zhonghuan’s headquarters and all of its wholly-owned and controlled subsidiaries. All directors, senior management and employees of the Company are required to comply strictly with this Policy. At the same time, we encourage external strategic partners, upstream suppliers and downstream channel partners to conduct their business activities with reference to the requirements of this Policy. The Company incorporates sustainable product management requirements into supplier cooperation contracts and strategic cooperation agreements, contractually binding the upstream and downstream of the supply chain so as to reduce the adverse environmental and social impacts of raw material procurement at source.

The Company has established a systematic management structure for the full life cycle of sustainable products, clearly defining the responsibilities of the departments accountable at each stage and forming

a complete management chain across the product life cycle. We have incorporated sustainable product management into the governance responsibilities of the Board of Directors, with the Strategy and Sustainable Development Committee exercising day-to-day management, supervision and guidance responsibilities, and mobilizing the departments of the Company and of its subsidiary business units to support the implementation of specific actions at every stage, from product design and optimization, raw material procurement, production and operations, and products and services, through to distribution and logistics.

3. Commitments

TCL Zhonghuan solemnly undertakes to fully fulfill the following sustainable product management responsibilities:

- Fully fulfill our environmental, safety and producer responsibilities, adhere to the philosophy of green and low-carbon R&D, and continuously improve our closed-loop control system covering the entire product life cycle;
- Steadily increase the proportion of recycled and low-carbon raw materials procured and used and, relying on whole-process quality control, eliminate product quality and safety recall incidents;
- Deepen our engagement in end-of-life PV product recycling and resource regeneration, and advance the development of a closed-loop circular system for decommissioned PV products;
- Embed sustainability requirements across the entire chain of product R&D, procurement, production, after-sales service and logistics, so as to minimize environmental emissions and social risks across the product life cycle;
- Strictly implement responsible mineral sourcing to ensure that the supply chain is free from conflict minerals and forced labor, effectively upholding human rights and labor standards in the supply chain;
- Proactively disclose product sustainability data to customers, investors and the public, comprehensively enhancing supply chain transparency and credibility.

4. Strategies

TCL Zhonghuan strictly complies with regulations and standards including the Administrative Measures for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products, GB/T 26572, GB/T 39560, the Regulations on the Administration of the Recovery and Disposal of Waste Electrical and Electronic Products, the Measures for the Environmental Administration and Registration

of New Chemical Substances, the Restriction of Hazardous Substances Directive (RoHS), the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation and the Waste Electrical and Electronic Equipment (WEEE) Directive. We actively implement sustainable management across the product life cycle, fulfill our Extended Producer Responsibility (EPR) obligations, and deeply integrate ESG and sustainability principles into product lifecycle management.

4.1 Sustainable Product Design and R&D

The Company drives the green and low-carbon transformation of its products through technological breakthroughs. Taking a full lifecycle perspective on PV products, we comprehensively consider the environmental impacts of the entire chain, from the extraction and processing of raw and auxiliary materials through smart manufacturing, warehousing and logistics, power plant operation, and decommissioning and recycling, at the very source of product R&D and design. Our core initiatives include: focusing on green R&D projects such as the substitution of low-carbon silicon-based materials and lightweight module structures; strictly following waste-free design principles; and continuously improving product disassemblability and material recycling rates, so as to reduce the carbon footprint and pollutant emissions per unit of PV product from the R&D source.

- **Lightweighting and low-carbon material substitution:** Focusing on core products such as silicon wafers and PV modules, we are developing green R&D projects including the substitution of low-carbon silicon-based materials, lightweight module structures and adhesive-free, easy-to-disassemble encapsulation, so as to reduce the carbon footprint per unit of product.
- **Waste-free circular design:** We strictly follow waste-free design principles and continuously improve product disassemblability and material recycling rates.
- **Design for recyclability:** We introduce material recyclability assessments at the product development stage, giving priority to single materials or separable composite materials.
- **Design for product longevity:** We are advancing improvements in module reliability design, striving to continuously extend product service life and reduce lifecycle resource consumption.

4.2 Environmental Impacts Arising from Product Use

The Company routinely carries out product carbon footprint accounting, life cycle assessment and a range of green product certifications. For our core PV products, we conduct comprehensive life cycle analysis and carbon footprint traceability, thoroughly reviewing product resource consumption, energy use and environmental emissions, and completing compliance evaluations across the four dimensions of resources, energy, environment and quality.

Using 2023 as the base year, the Company has set a target that, by 2030, at least four products will have obtained a product Life Cycle Assessment (LCA) and that products covered by LCA will span 100% of the Company's business lines. To date, the Company's flagship PV products have obtained ISO 14067 product carbon footprint certification, French ECS carbon footprint certification and LCA life cycle assessment certification. Going forward, we will continue to extend product carbon footprint coverage to all product categories on sale, build a dynamic product carbon footprint database, and proactively disclose low-carbon product data to customers at home and abroad, supporting our response to low-carbon trade barriers overseas and the winning of green orders.

4.3 Control of Hazardous Substances in Products

The Company regards the management of hazardous substances across the product life cycle as the baseline for product compliance and green safety. We strictly comply with the environmental regulations of the places where we operate and of core markets worldwide, and we have established and follow a four-step process of "hazardous substance identification – risk analysis – risk evaluation – risk control" to implement rigorous hazardous substance risk management:

1) **Hazardous substance identification:** We systematically review the hazardous substances involved across the product life cycle and establish a dynamic management list and a hazardous substances inventory, clearly identifying substance names, CAS numbers (unique identifiers), hazardous properties and specific application scenarios.

2) **Risk analysis:** We conduct in-depth analysis across multiple dimensions, including the likelihood of hazardous substances occurring, the frequency and degree of exposure, and the severity of the consequences.

3) **Risk evaluation:** We quantify risk levels based on the likelihood of occurrence and the severity of consequences, build a risk matrix and establish control priorities.

4) **Risk control:** Through the coordinated application of source control, process control and end-of-pipe control, we build diversified risk prevention, control and early-warning mechanisms.

The Company has set tiered strategic targets for hazardous substance substitution: by 2035, to completely eliminate high-risk hazardous substances from our products, to progressively reduce and control medium-risk hazardous substances year by year, and to dynamically optimize substitution plans for low-risk restricted substances in line with the pace of technological development in the industry.

The Company regularly organizes hazardous substance risk assessments. Whenever a new chemical is introduced, a raw material supplier is changed, a production process is adjusted or relevant

regulations and standards are updated, a supplementary assessment is initiated immediately. We progressively eliminate, reduce or substitute hazardous substances at every stage of the life cycle, and continuously explore the introduction of environmentally friendly materials free of hazardous substances, building up a technology reserve.

The Company fully embeds sustainability control and hazardous substance compliance requirements into the entire process of supplier admission, routine auditing and annual appraisal, and has established a graded penalty mechanism: suppliers that fail to meet compliance standards are subject to point deductions and rectification, suspension of new orders and the freezing of their cooperation qualification, up to permanent removal from the approved supplier list. In addition, a routine Company-wide hazardous substance risk assessment is conducted annually, and a dedicated supplementary risk assessment is initiated immediately in any of four situations: the introduction of new materials, a change of supplier, an adjustment to processes, or an update to regulations.

4.4 Green Production and Lean Manufacturing

The Company strictly abides by national and local laws and regulations on ecology and environment and on work safety, as well as by industry standards. We deepen our green manufacturing and lean, smart manufacturing systems and comprehensively advance the intelligent, low-carbon green factory upgrading of all our production bases, anchored on two firm targets: by 2030, to achieve full coverage of zero-waste factory certification across all subsidiary production bases, and to use 100% renewable electricity for all plant production electricity (accounted for on a unified basis covering self-generated and self-consumed on-site PV power, direct green power purchases and the redemption of compliant green electricity certificates).

Throughout the production process we strictly implement the reduce, reuse and recycle (3R) principles. For the bulk packaging materials specific to PV wafers and PV modules, we are rolling out solutions for thinner packaging, the reuse of circulating pallets, and the recovery and regeneration of cushioning materials, and are comprehensively phasing out non-degradable single-use packaging materials, so as to continuously improve the resource utilization rate of production solid waste and the reuse rate of packaging materials.

4.5 End-of-Life Product Management

The Company strictly complies with the EU Industrial Emissions Directive (IED 2010/75/EU), the EU Waste Electrical and Electronic Equipment (WEEE) Directive and domestic regulations on the Extended

Producer Responsibility system, proactively fulfilling extended producer responsibility in the PV industry. At this stage, we are focusing on technological breakthroughs in the recycling of decommissioned PV products, continuously carrying out R&D on the disassembly processes and regeneration technologies for core materials such as PV modules and waste silicon wafers, and steadily advancing small-scale pilot construction of recycling production lines. Working with industry chain partners, we have made an initial start on building collection channels for decommissioned products and are progressively exploring pathways for the compliant disposal of end-of-life PV product waste and for material regeneration, with a long-term plan to build a closed-loop circular system for the PV industry chain.

4.6 Consumer Health and Safety

The Company consistently upholds the baseline of product quality and user health and safety, doing its utmost to safeguard the safety of life and property and the physical and mental well-being of end users worldwide. Using 2023 as the base year, the Company has set clear product safety control targets for 2030: to maintain zero major product recall incidents, zero major product safety accidents and zero administrative penalties from market regulators each year.

The Company comprehensively benchmarks against product safety standards in major markets worldwide, ensuring that all products on sale meet the mandatory requirements of local environmental, health and safety laws and regulations. We have also established standardized processes for non-conforming product control and product recall emergency response covering all product categories, and we implement whole-chain quality control together with a regular problem-improvement mechanism. We conduct dedicated continuous improvement process (CIP) training for all employees and, through initiatives such as process optimization, process quality improvement, and emission and consumption reduction, we eliminate product safety hazards at source and improve resource efficiency, comprehensively safeguarding consumer health and safe use.

5. Policy Review and Revision

The Board of Directors is the highest decision-making and supervisory body for the Company's sustainable product management. The issuance of this Policy and the commitments contained herein has been endorsed by the Company's senior management. The Company shall formally review this Policy at least once a year. The review shall take into account changes in applicable laws, regulations and regulatory requirements; updates to international standards and industry guidelines; changes in customer requirements; and adjustments to the Company's relevant internal policies. Based on the review results

and actual needs, the Company shall revise this Policy as appropriate to ensure that it remains current and applicable.

This Policy is published on TCL Zhonghuan's official website for reference by all stakeholders. Its implementation and the related key performance indicators are disclosed annually in the Company's sustainability report.