TCL Zhonghuan Renewable Energy Technology Co., Ltd.

Responsible Minerals Management Policy

1. Introduction

TCL Zhonghuan Renewable Energy Technology Co., Ltd. and its subsidiaries (hereinafter referred to as “TCL Zhonghuan,” “we,” “us,” or “the Company”) are committed to responsible supply chain management. The Company incorporates responsible mineral sourcing and management into its responsible procurement system and integrates the related requirements into supplier admission, certification, monitoring and audit, and continuous improvement processes. In addition to conflict minerals such as gold, tungsten, tantalum and tin, the Company includes silicon and related silicon-based materials within the scope of responsible minerals management. We promote risk identification, due diligence, source tracing and risk mitigation throughout the upstream and downstream supply chain, thereby jointly advancing the responsible sourcing, production and use of minerals and materials.

2. Scope

This Policy applies to TCL Zhonghuan headquarters and all its wholly owned and controlled subsidiaries. All directors, senior management personnel and employees of the Company shall strictly comply with this Policy. We also encourage external strategic partners, upstream suppliers and downstream channel partners to comply with it. The Company incorporates responsible minerals management requirements into supplier cooperation contracts, strategic cooperation agreements and relevant procurement documents, thereby contractually promoting the implementation of responsible sourcing and due diligence requirements throughout the upstream and downstream supply chain and preventing and reducing at source environmental, social and governance risks associated with minerals and high-impact materials.

For the purposes of this Policy, responsible minerals refer to the minerals, ores and derivative materials involved in the Company’s products, operations and supply chains, including but not limited to gold, tungsten, tantalum, tin, silicon, cobalt and mica originating from Conflict-Affected and High-Risk Areas (CAHRAs), as well as high-impact materials that present elevated environmental, social, human rights, labor, community, business ethics or traceability risks. The Company expressly includes silicon within the scope of high-impact materials management, covering relevant silicon-

based raw materials and key processing stages, including quartz/quartzite, metallurgical-grade silicon (silicon metal), polysilicon, silicon ingots and silicon wafers. The Company focuses on actual or potential risks relating to legality of origin, environmental management, energy and water use, pollution prevention and control, occupational health and safety, human and labor rights, community impacts, business ethics and supply chain traceability. CAHRAs include conflict-affected areas designated by resolutions of the United Nations Security Council, conflict-affected and high-risk areas identified by the European Union, relevant areas covered by the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, and other high-risk areas identified in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

3. Commitments

We commit to complying with applicable laws and regulations in China and other jurisdictions, and take guidance from the United Nations Global Compact, Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, the EU Conflict Minerals Regulation, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Responsible Minerals Initiative (RMI), the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains issued by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC), and the Solar Stewardship Initiative (SSI) ESG Standard and Supply Chain Traceability Standard. The Company applies risk-based responsible sourcing and supply chain due diligence to conflict minerals and high-impact materials, including silicon, and commits to:

1）Not directly or indirectly source, use or sell minerals or materials that finance or otherwise support non-state armed groups, or that are associated with unlawful control, armed conflict or serious illegal activities;

2）Prohibit severe human rights abuses, including torture, cruel, inhuman or degrading treatment, forced labor, the worst forms of child labor and widespread sexual violence;

3）Not directly or indirectly provide support to non-state armed groups or illegally acting public or private security forces;

4）Prohibit bribery, corruption and money laundering, as well as false statements or fraud relating to taxes, fees and royalties;

5）Conduct enhanced due diligence on minerals originating from CAHRAs and, where high risks

cannot be effectively prevented or mitigated within a reasonable period, take measures such as suspending sourcing, requiring corrective action or terminating the business relationship;

6）Apply dedicated risk management to high-impact materials, with silicon as a priority material, and promote source transparency, verifiable information and material traceability across key supply chain stages from quartz/quartzite and metallurgical-grade silicon (silicon metal) to polysilicon, silicon ingots and silicon wafers, while continuously identifying and mitigating related environmental, occupational health and safety, human rights, labor rights, community and business ethics risks;

With 2023 as the baseline year, the Company has set the following targets:

- By 2030, maintain a 100% signing rate for the Responsible Minerals Sourcing Commitment Letter among suppliers of key minerals and silicon materials;
- By 2030, achieve a valid response rate of 95% for applicable CMRT and EMRT submissions and silicon supply chain traceability surveys among key suppliers.

4. Responsibilities

TCL Zhonghuan has established a sustainable supply chain governance structure covering strategic decision-making, oversight and management, and operational implementation:

- The Strategy and Sustainability Committee serves as the Company’s highest governance and decision-making body for supply chain management and sustainable development, and is responsible for reviewing strategies and major matters relating to responsible procurement, supply chain ESG management and responsible minerals management;
- The Sustainability Steering Committee serves as the oversight body responsible for supervising the implementation of the Responsible Minerals Management Policy and related due diligence mechanisms, and regularly reviewing management performance and risks relating to minerals and high-impact materials, including silicon;
- The Sustainability Advancement Office and the Supply Chain Management Center are responsible for coordinating supply chain strategic planning, process development, business collaboration, special procurement initiatives and digital management, and for advancing responsible minerals due diligence, silicon supply chain traceability and supply chain risk identification;
- The relevant supply chain management functions serve as the implementing bodies and are responsible for supplier admission, day-to-day management, risk assessment, corrective

action tracking and performance improvement.

The Company continues to strengthen cross-functional coordination and integrates responsible minerals management requirements into procurement, quality, compliance, sustainability and other business processes.

5. Strategies

TCL Zhonghuan has established a responsible minerals management mechanism covering risk identification, due diligence, supplier management, source tracing, risk mitigation and continuous improvement for conflict minerals and high-impact materials, including silicon.

5.1 Due Diligence: Conduct regular risk-based due diligence on mineral and high-impact material supply chains, including supplier identity verification (KYC), identification of CAHRAs, investigation of country of origin and supply chain routes, risk assessment, corrective action tracking, independent verification and disclosures where necessary, in order to identify and assess human rights, environmental, business ethics and traceability risks in the supply chain.

5.2 Supplier Management: Require applicable suppliers to sign the Responsible Minerals Sourcing Commitment Letter and incorporate responsible minerals and high-impact materials management requirements into the TCL Zhonghuan Partner Code of Conduct, procurement contracts and supplier evaluation mechanisms. Suppliers shall cooperate by providing information on the origin of minerals and materials, upstream supply chains, production and processing, and material flows. They shall not source, use or sell minerals or materials associated with armed conflict, severe human rights abuses or major illegal activities, and shall promptly take corrective and mitigation measures for identified risks.

5.3 High-Impact Materials and Silicon Supply Chain Management: Manage silicon as a high-impact material through dedicated controls and require suppliers to provide origin, processing and flow information for key stages from quartz/quartzite and metallurgical-grade silicon (silicon metal) to polysilicon, silicon ingots and silicon wafers. Based on the level of risk, the Company reviews supplier performance in environmental permitting, energy and water management, pollution prevention and control, occupational health and safety, human and labor rights, community impacts, business ethics and traceability. Corrective action plans are established for suppliers with missing information, unclear sources or high-risk findings, and the effectiveness of corrective actions is continuously tracked and verified.

5.4 Training and Education: Provide regular training to relevant employees in procurement, supply chain, quality, compliance and sustainability to enhance their awareness of and ability to manage responsible minerals, CAHRAs, high-impact materials and silicon supply chain risks.

5.5 Continuous Improvement: Regularly review and improve the responsible minerals management mechanism, taking into account applicable laws and regulations, international standards, industry initiatives, supply chain risks and stakeholder feedback, and continuously enhance due diligence and traceability management for high-impact materials, including silicon.

6. Handling of Violations

If any supplier or other stakeholder is found to have violated this Policy in the course of cooperation with TCL Zhonghuan, the Company will take immediate action, including but not limited to suspending cooperation, terminating the contract, and requiring compensation for related financial and reputational losses.

7. Grievance and/or Reporting

TCL Zhonghuan has established accessible and confidential communication and grievance channels to support the effective implementation of this Policy. Employees, suppliers, business partners, customers and other stakeholders may submit grievances or report concerns regarding mineral supply chain risks, anonymously or under their real names, to the Compliance Department or relevant regulatory authorities through the following channels:

TCL Zhonghuan Grievance and Reporting Channels:

Compliance Reporting Email: jubao@tzeco.com

- Compliance Hotline: +86-022-23789766-8022
- Mailing Address for Written Complaints: No. 10 Haitai South Road, Huayuan Industrial Park, Tianjin, China

TCL Zhonghuan will, in accordance with applicable laws and regulations, conduct objective investigations into reported cases, handle them impartially, and provide timely feedback to the reporting party. At the same time, the Company will strictly protect the lawful rights and interests of complainants and reporting persons and prohibit threats, intimidation, harassment or any other form of unfair treatment arising from the submission of a grievance or report.

We look forward to working with all partners to advance the sustainable development of global mineral supply chains and achieve the overall objective of responsible mineral sourcing.

8. Policy Review and Revision

Responsible minerals management is overseen by the Board of Directors as the Company's highest decision-making and supervisory body. 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 access by all stakeholders. The implementation of the Policy and relevant key performance indicators will be disclosed annually in the Company's Sustainability Report.