TCL Zhonghuan Renewable Energy Technology Co., Ltd.

Business Ethics Policy

1. Purpose

The TCL Zhonghuan Business Ethics Policy (hereinafter referred to as the “Policy”) sets out the norms that must be followed in the Company’s business and management activities and in the performance of employees’ duties. It embodies TCL Zhonghuan’s corporate culture of honesty, good faith and compliant operations, ensures the legality, integrity and sustainability of the Company’s business activities, actively puts social responsibility into practice, and creates greater value for customers, shareholders and society.

2. Scope

This Policyapplies to TCL Zhonghuan Renewable Energy Technology Co., Ltd. (hereinafter referred to as “TCL Zhonghuan”, “the Company” or “we”) and its wholly-owned and controlled subsidiaries (hereinafter referred to as “subsidiaries”). All directors, senior management, employees and temporary staff (including interns and part-time employees) of the Company are required to comply strictly with it. 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, and we incorporate the requirements of the Business Ethics Policy of Conduct into supplier cooperation contracts and strategic cooperation agreements, so as to contractually bind the upstream and downstream of the supply chain.

3. Basic Ethical Conduct Requirements

(1) Anti-Corruption, Anti-Fraud and Anti-Money Laundering

1. The Company strictly complies with the laws and regulations on anti-commercial bribery of the countries/regions where it operates. We commit to opposing any form of bribery and prohibit providing, whether directly or through (by instructing) a third party, or accepting, any valuable property or other economic benefits beyond the scope of social courtesy to or from interested parties. In business dealings with government officials and business partners, we uphold the principle of integrity and self-discipline. When offering or accepting gifts or hospitality, we comply with the legally prescribed and generally accepted standards of business practice of the relevant

country/region as well as the Company's standards, and follow the application and approval procedures prescribed by the Company.

2. The Company prohibits any form of fraud and malpractice, including but not limited to falsifying records, making false reimbursements, concealing facts, misappropriating assets, falsifying financial information, fraudulently obtaining qualifications, or other deceptive practices carried out to obtain unfair, improper or illegal benefits. The Company advocates the principles of integrity and transparency in operations and requires employees and business partners to record and disclose relevant information truthfully, accurately and completely in their business activities.
3. Prohibition of kickbacks: It is strictly prohibited to offer, pay, promise or authorize the payment, whether directly or indirectly, of any facilitation payment, kickback or other informal payment for the purpose of expediting or influencing any routine government action or business decision, or of obtaining an improper advantage.
4. Opposition to extortion: It is strictly prohibited to use one's authority or position, or means of threat, to demand or coerce any form of property, service or improper benefit from partners, suppliers, customers or any other stakeholders.
5. Elimination of embezzlement: No individual is permitted to use the convenience of their position to embezzle, steal, fraudulently obtain, or otherwise unlawfully appropriate Company property, public funds or other assets entrusted to their management. All fund expenditures must be approved through formal financial channels, and the establishment of "slush funds" or off-the-book accounts is strictly prohibited.
6. Employees' personal voluntary donations and sponsorships must be made not on behalf of the Company and must not be conditional on obtaining improper benefits for the Company.
7. The Company conveys its anti-commercial bribery and integrity principles and policies to its business partners. Company employees shall record payments and expenses truthfully and accurately and cooperate with the Company's audits and supervision. Any suspected bribery or corruption shall be reported promptly.
8. All financial transactions must be recorded properly and fairly. Any payment must be supported by an accompanying contract, invoice and receipt. Invoices and receipts must reflect the actual nature of the financial transaction. There shall be no "off-the-book" or secret accounts, nor shall

any document be created that fails to fairly and accurately reflect the transaction to which it relates.

9. In its business activities overseas, the Company does not participate in any political donations, and does not, whether directly or indirectly, provide political contributions to political candidates or parties, or their affiliates, in the local country or region.

10. In the Company's operations and in the course of employees' duties, the regulations in the field of anti-money laundering shall be strictly observed. Employees and the Company are prohibited from concealing illegal funds or otherwise legitimizing illegal funds, must not make payments to non-transaction accounts or abnormal business accounts, and must avoid dealings with parties suspected of money laundering.

11. Using 2023 as the base year, the Company commits to achieving the following by 2030:

    - Maintaining zero negative incidents of corruption, conflict of interest, fraud, money laundering and the like each year;
    - Achieving 100% coverage of business ethics training for employees each year;
    - Conducting corruption risk assessments covering 100% of key business processes across the Company;
    - Achieving 100% coverage of ISO 37001 anti-bribery management system certification.

(2) Anti-Monopoly and Fair Competition

1. In its transactions, the Company ensures compliance with the laws and regulations that promote fair competition among companies in the countries and regions where it operates.

2. The Company commits not to participate in activities that have the effect of restricting competition, not to enter into monopoly agreements with competitors, and not to discuss or negotiate with competitors on matters that could be deemed monopolistic conduct—for example, prices/price composition, market/territory allocation, or joint boycotts of transactions.

(3) Labor Protection

1. The Company complies with and diligently implements the laws and regulations on labor and employment of the countries and regions where it operates, establishes and improves its own labor and employment systems, fully respects and safeguards employees' lawful rights and

interests, prohibits employment discrimination on the basis of race, culture, religion or ethnicity, and fosters a positive working atmosphere.

2. The Company safeguards employees' lawful rights and interests, including remuneration for labor, rest and leave, social insurance and access to vocational skills training, and does not evade in any form the fulfillment of its statutory obligations to employees.
3. The Company establishes, improves and implements labor safety and health systems to protect employees' health and safety, strictly implements the labor safety and health norms and standards of the countries and regions where it operates, provides employees with labor safety and health education, and prevents safety accidents and reduces occupational hazards.
4. The Company provides employees with labor safety and health conditions and the necessary protective equipment as required by the laws of the countries and regions where it operates, and conducts regular health examinations for workers engaged in tasks involving occupational hazards.
5. The Company promotes knowledge of safe working practices in employees' vocational training, encourages employees to use working tools correctly, and reminds employees engaged in hazardous work to enhance their safety awareness.

(4) Data Protection and Information Security

1. To ensure data security, the Company plans the development and construction of its data protection systems in a coordinated manner, establishes data security protection rules at all levels and in all areas, and strengthens data security and information assurance in the course of data application.
2. When collecting and managing information and data, Company personnel shall:

- not steal personal information, and not publish information that is prohibited from publication;
- where content is prohibited from publication or transmission, immediately cease transmitting such information, take measures such as removal to prevent its further dissemination, retain the relevant records, and report to the competent authorities;
- network operations personnel shall not disclose, alter or damage the personal information they have collected; and shall not provide personal information to others without the consent of the person from whom it was collected;

- the unauthorized downloading or transfer of important personal information and enterprise data to personal mobile data transmission devices is prohibited;
- the arbitrary cross-border transfer of important information and data is prohibited. Personal information for which the consent of the personal information subject has not been obtained, or which may harm individual interests, and information that may affect national security, harm the public interest or compromise the Company's information security, must not be transferred across borders arbitrarily;
- engaging in conduct prohibited by the Company's rules on data protection and information management is prohibited.

(5) Export Control and Trade Sanctions

1. Export control refers to the actions by which a country or government establishes a series of restrictive or regulatory mechanisms to prevent, whether directly or indirectly, its nationally restricted goods or technologies from circulating or being exported through various channels to specific entities or countries, thereby safeguarding national security, protecting national interests and ensuring technological and economic security. Violations of export control requirements may lead to serious consequences, including but not limited to administrative penalties, criminal penalties (such as imprisonment and fines), international sanctions (such as trade embargoes and asset freezes), and reputational damage.
2. Trade sanctions refer to the actions by which a country or international organization adopts, through law or treaty, sanctions measures against specific countries, groups, entities and individuals, in order to prevent or sever the economic and trade relations between that country (and its allies) and other specific countries, groups, entities and individuals, thereby achieving political, diplomatic, economic or security objectives. Sanctions measures take various forms, including but not limited to trade restrictions, embargoes, asset freezes and financial sanctions.
3. In accordance with legal requirements and in light of its own circumstances, the Company shall establish a complete and effective compliance management system for export control and trade sanctions in a targeted manner, so as to avoid the risk of violations. Where the Company is investigated or penalized on suspicion of a violation, it shall promptly take relevant measures to reduce the risk of penalties.

(6) Financial Reporting and Taxation

1. The Company sets up accounting books in accordance with the law and ensures their authenticity and completeness. No entity or individual may, in any way, instruct, direct or compel accounting bodies or accounting personnel to forge or alter accounting vouchers, accounting books or other accounting materials, or to provide false financial and accounting reports. No entity or individual may retaliate against accounting personnel who perform their duties in accordance with the law and resist conduct that violates the provisions of this law.
2. According to the needs of its operations, the Company sets up an accounting body, or assigns accounting personnel within a relevant body and designates a person in charge of accounting. Accounting personnel shall possess the professional competence required to carry out accounting work.
3. At the end of each fiscal year, the Company prepares financial and accounting reports, which are audited by an accounting firm. The Company's engagement or dismissal of the accounting firm that undertakes its audit business is decided by the general meeting of shareholders or the Board of Directors in accordance with the Articles of Association.
4. The Company complies with financial and tax laws, strengthens its awareness of paying taxes in accordance with the law, and fulfills its tax obligations in accordance with the law.
5. The Company carries out tax registration, sets up accounting books, keeps vouchers and files tax returns in accordance with the law; the Company shall truthfully report its production and operation situation and its implementation of financial systems to the tax authorities, provide the corresponding statements and materials in accordance with the relevant regulations, and shall not conceal, omit or misreport, nor evade taxes.
6. The Company commits not to use confidential jurisdictions or "tax havens" to avoid taxes by "sham" means.

(7) Intellectual Property Protection

1. The Company complies with the laws and regulations on intellectual property protection, strengthens its awareness of intellectual property protection, and protects the Company's patent rights, copyrights and trademark rights in accordance with the law. No other company or individual may use, transfer, sell or misappropriate the Company's intellectual achievements in any form without permission. At the same time, the Company prohibits the infringement of others' patent rights, copyrights and trademark rights.

2. The Company prohibits the infringement of others' patent rights, including but not limited to: without the permission of the patentee of an invention or utility model patent, manufacturing, using, offering to sell, selling or importing its patented products for production or business purposes, or using its patented process and using, offering to sell, selling or importing products obtained directly through that patented process; and, without the permission of the patentee of a design patent, manufacturing, offering to sell, selling or importing its design patent products for production or business purposes.

3. The Company prohibits passing off unregistered trademarks as registered trademarks; and prohibits malicious trademark registration applications that are not made for the purpose of use. At the same time, in the course of using a registered trademark, it shall not, on its own, alter the registered trademark, the name or address of the registrant, or other registered particulars.

4. The Company prohibits the infringement of others' copyrights, including but not limited to: using another's work where remuneration should have been paid but was not; publishing or registering software jointly developed with others as software independently completed by oneself without the permission of the co-developers; and intentionally circumventing or destroying the technical measures taken by a copyright owner to protect its software copyright. No other company or individual may use, transfer, sell or misappropriate in any form the service-related intellectual achievements held by TCL Zhonghuan and its subsidiaries without permission.

(8) Prevention of Insider Trading

1. The Company prevents the use of material non-public information for securities trading, and does not use or share material non-public information about TCL Zhonghuan or any other company for the purpose of trading securities.

2. Insider information as referred to in this Policy means information concerning the operations or finances of TCL Zhonghuan or other listed companies, or having a material impact on the share prices of TCL Zhonghuan and other listed companies, that has not yet been made public. This specifically includes: material changes to the Company's business policies and business scope, or major investment activities; the conclusion of important contracts, the provision of major guarantees, or the conduct of related-party transactions that may have a significant impact on the Company's assets, liabilities, equity and operating results; the

occurrence of major debts and defaults on major debts due; the occurrence of major losses; material changes in the external conditions of the Company's production and operations, or material changes among internal shareholders, directors, supervisors and senior management; and other important information that may cause fluctuations in the share price.

(9) Avoidance of Conflicts of Interest

1. We commit not to engage in personal financial or other business transactions that may conflict with the Company's business interests, and to comply with the Company's relevant requirements on related-party relationships.
2. Company employees have the responsibility to declare conflicts of interest to the Company promptly and truthfully, and to actively cooperate with the Company in adjusting or recusing themselves from matters that may give rise to conflicts of interest.
3. Conflict of interest as referred to in this Policy means a situation in which the interests of an employee or their related parties conflict, or may conflict, with or deviate from the interests of the Company. This includes an employee, during their employment, establishing, investing in or holding a position at an enterprise that competes with the Company; an employee having engaged in the aforementioned conduct before joining and having failed to disclose or report it upon joining; or a company or other economic entity where the employee's spouse, relatives or persons with a close relationship work engaging in business dealings with the company where the employee works.

(10) Environmental Responsibility

1. We have always upheld the business philosophy of "environmental friendliness", regarding it as an important mission for the Company's development and as the boundary within which we operate. We commit to complying with the environmental laws, regulations and industry standards applicable in the places where we operate, and to supporting domestic and international initiatives including the Paris Agreement, the United Nations Sustainable Development Goals (SDGs) and China's "dual carbon" goals.
2. We commit to fully considering the impact on nature and the ecological environment, and to actively taking measures to reduce environmental impacts and improve our environmental performance, across all of the Company's production and operations, business facilities, products and services, distribution, logistics, waste management and commercial activities,

as well as in our cooperation with suppliers, service providers, contractors and other key business partners.

4. Business Ethics Training and Awareness

The Company has established a business ethics training and awareness mechanism, regularly conducting business ethics training for directors, supervisors, senior management and all employees, and conducting dedicated training for key positions in light of the risk characteristics of those positions. The training covers topics including but not limited to anti-bribery and anti-corruption, anti-unfair competition and anti-monopoly, anti-fraud, conflicts of interest, anti-money laundering, prevention of insider trading and whistleblowing mechanisms, so as to enhance employees' ability to identify, prevent and respond to violations.

5. Business Ethics Supervision and Audit

The Company incorporates business ethics and compliance supervision into the governance responsibilities of the Board of Directors, with the Audit Committee exercising the highest level of supervision over the related risks on behalf of the Board. The Company has established an independent Audit Center that reports directly to the Audit Committee and is responsible for the identification, investigation and rectification tracking of business ethics risks, safeguarding the effectiveness of supervision through the independence of the mechanism.

In conjunction with its annual audit plan, the Company conducts comprehensive audits, special audits and internal control self-assessments, implementing rolling supervision of key business processes at its headquarters and subsidiaries, and in principle achieving full coverage of its main operating units over a two- to three-year cycle. The audits and risk assessments cover business ethics topics such as anti-bribery and anti-corruption, anti-unfair competition and anti-monopoly, anti-fraud, conflicts of interest, anti-money laundering and prevention of insider trading, as well as the implementation of the related systems.

6. Complaints and Whistleblowing

All employees of the Company have the responsibility to report any known or suspected violation, including violations of laws, regulations, guidelines and Company policies. Any actual or potential violation identified shall be reported to the Company promptly. When making complaints and reports, Company employees shall be objective, impartial and fact-based, and shall not fabricate or invent facts.

The Company has established unified reporting channels:

Whistleblowing email: jubao@tzeco.com

Whistleblowing hotline: 022-23789766-8022

Address for correspondence and visits: No. 10 Haitai South Road, Huayuan Industrial Park, Xiqing District, Tianjin.

Upon receiving a report, the Company will promptly organize an investigation into the alleged violation. For personnel confirmed through investigation to have engaged in a violation, the Company will take measures such as rectification, warning, disciplinary sanction, termination of the labor relationship and pursuit of legal liability, in accordance with the relevant systems and applicable laws and regulations. The Company will conduct cause analysis and rectification tracking for violation incidents and will continuously improve its internal control and compliance management mechanisms to prevent similar incidents from recurring.

The Company supports anonymous reporting and commits to keeping whistleblowers' personal information strictly confidential. It strictly prohibits the disclosure of the name, department, company name or other details of a whistleblower, strictly prohibits disclosing report information to the person reported, and prohibits any unrelated person from accessing report information without authorization, so as to effectively safeguard whistleblowers' lawful rights and to strictly prohibit any direct or indirect discrimination, obstruction, suppression or retaliation against them.

7. Review and Revision

The Board of Directors is the highest decision-making and supervisory body for the Company's business ethics 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.