

TCL Zhonghuan Partner Code of Conduct

1. Preamble

TCL Zhonghuan New Energy Technology Co., Ltd. and its wholly-owned and holding subsidiaries (hereinafter referred to as "TCL Zhonghuan" or "we") actively align with international cutting-edge ESG (Environmental, Social, and Governance) and Traceability Management trends, integrating the concept of sustainable development into the daily operations of all industries. To ensure the sustainable and healthy development of business cooperation with partners, establish compliance standards and ethical requirements commensurate with business operations, and build long-term cooperative relationships based on trust, honesty, openness, and integrity, we hereby formulate this "TCL Zhonghuan Partner Code of Conduct" (hereinafter referred to as the "Code of Conduct").

2. Code of Conduct

This Code of Conduct applies to all business partners of TCL Zhonghuan New Energy Technology Co., Ltd. and its wholly-owned and holding subsidiaries (including suppliers(including those in the silicon supply chain), service providers, contractors, distributors, agents, constructors, lessees, and subcontractors; hereinafter referred to as "Partners" or "Partner") as well as their employees, representatives, contractors, and any entities working for them. Partners are encouraged to promote their supply chains (including but not limited to secondary and tertiary suppliers) to comply with equivalent standards.

2.1 General Legal Compliance

All activities conducted by Partners must strictly comply with the laws and regulations of the countries/regions where they operate, which is the cornerstone of adhering to this Code of Conduct. On this basis, we encourage Partners to actively adopt internationally recognized standards and best practices to assume broader social and environmental responsibilities and uphold higher business ethics. Many provisions of this Code are derived from international standards and consensuses such as the United Nations Guiding Principles on Business and Human

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Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the Universal Declaration of Human Rights.

2.2 Labor Rights Protection

We will take labor management performance into account when selecting Partners or considering extending cooperative relationships. Partners shall safeguard employees' rights in accordance with the laws of the jurisdictions where they operate and internationally recognized standards. Partners shall create a healthy, dignified, and fair working environment and meet the following requirements:

- 1) Prohibition of Child Labor: The employment or use of child labor is strictly prohibited. If the country or local laws where the operation is located stipulate a higher compulsory education age or minimum working age, the higher age shall prevail. "Child labor" refers to the employment of children or adolescents, excluding the acceptable circumstances specified in the ILO Minimum Age Convention, 1973. If a Partner discovers the presence of child labor, it shall immediately take remedial measures that safeguard the best interests of the child. Partners shall ensure that employees under the age of 18 do not engage in hazardous work. For the purpose of this Code, "hazardous work" refers to work environments where employees are exposed to: physical, mental, or sexual abuse; underground, underwater, high-altitude, or confined spaces; work requiring the use of dangerous machinery, equipment, and tools, or the handling and transportation of heavy loads; exposure to harmful substances, chemicals, processes, extreme temperatures, noise, or vibration; prolonged work hours, night shifts, or unreasonable restrictions, or other harsh conditions.
- 2) Freedom of Association and Collective Bargaining: All individuals have the right to freely form, join, and organize trade unions and engage in collective bargaining on their own behalf and on behalf of the organization. Partners shall respect this right and clearly inform employees that they can freely join the worker organizations of their choice without facing any adverse consequences or retaliation from the company. Partners shall not interfere in any way with the establishment, operation, or management of such worker organizations or collective bargaining. When the right to freedom of association and collective bargaining is restricted by law, Partners shall allow workers to freely select their own worker representatives.

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- 3) Anti-Discrimination and Harassment: Partners shall not tolerate or support discrimination based on race, ethnicity, regional or social origin, social class, lineage, religion, physical disability, gender, sexual orientation, family responsibilities, marital status, trade union membership, political views, age, or any other grounds in matters such as recruitment, remuneration, training opportunities, promotion, dismissal, or retirement. Partners shall not interfere with employees' right to practice their beliefs and customs. Any form of threatening, abusive, exploitative, or sexual harassment behavior, including gestures, language, and physical contact, as well as any other form of non-sexual harassment, including but not limited to mob harassment and bullying, is not permitted in the workplace and/or in residences and other premises provided by the company for employees' use that are leased or contracted from other parties.
- 4) Disciplinary Practices: Partners shall treat all individuals with dignity and respect and shall not engage in or support corporal punishment, mental or physical coercion, or verbal abuse. Employees shall not be treated in a harsh or inhumane manner.
- 5) Working Conditions: Partners shall ensure that the wages paid to employees meet the statutory minimum wage standard of the country where they operate and shall not be lower than the local minimum wage standard. Partners shall ensure that wages are not deducted for disciplinary purposes unless the following conditions are met: such wage deduction for disciplinary reasons is permitted by national law; and it has obtained the consent through free collective bargaining. Partners shall ensure that employees are provided with a detailed written statement of the composition of wages and benefits for each pay period; Partners shall also ensure that wages and benefits comply with the requirements of applicable laws and regulations and are paid in a manner convenient for employees. Partners shall guarantee employees' rest time in accordance with the relevant provisions of the laws and regulations of the place of operation, shall not force employees to work overtime, and employees have the right to refuse overtime work. If overtime work is required due to special circumstances, Partners shall consult with employees, pay overtime compensation in accordance with local legal requirements, and the overtime hours shall not exceed the statutory working hours limit. At the same time, ensure that employees' weekly working hours comply with the relevant regulations of the place of operation and, where applicable, refer to the requirements of relevant ILO conventions. Partners shall strive to pay employees a living wage, which is based on the minimum wage standard required by the aforementioned laws and aligned with the ILO's living wage estimation principles. We reserve the right to conduct random inspections

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on Partners' payment of living wages, and have the right to request underperforming Partners to formulate improvement plans and provide necessary salary optimization consulting and resource support.

- 6) Employment Relationships: Partners shall ensure that written labor contracts containing easily understandable employment conditions are signed with all employees, and shall not adopt false apprenticeship schemes or other arrangements to evade obligations to employees stipulated by applicable laws involving labor and social security regulations.

2.3 Prohibition of Forced Labor

Voluntary Employment: Partners shall recruit employees on a voluntary basis, shall not use prison labor or slave labor, and shall not cause physical harm to employees or engage in any other form of forced labor, such as obtaining labor through specific government labor programs. Workers shall not be trafficked or exploited through threats, force, coercion, abduction, fraud, or any other means.

Prohibition of Forced and Compulsory Labor: Partners shall not use or support the use of forced or compulsory labor as defined in the ILO Forced Labour Convention, 1930 (No. 29), including prison labor or slave labor. They shall not require employees to pay deposits, guarantees, or withhold personal documents such as identity cards or academic certificates in any name at the start of employment. Workers shall not be trafficked or exploited through threats, force, coercion, abduction, fraud, or any other means. Partners or entities providing labor to Partners shall not withhold workers' wages, benefits, property, or documents to force employees to continue working. Partners shall ensure that they do not collect any part of employment agency fees or other fees paid by workers. Employees have the right to leave the workplace after completing the specified working hours and may terminate the employment contract freely after giving the company a reasonable notice period, ensuring that the relationship between employees and the company is based on free choice and without coercion.

Corrective Measures: Suppliers' compliance with this Code shall be subject to review by TCL Zhonghuan, including audits of working environments, production facilities, and residential facilities by third-party assessment institutions, as well as confidential interviews with workers.

2.4 Conflict Minerals

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TCL Zhonghuan expects Partners to understand the source of their resources, comply with applicable domestic and foreign laws, regulations, principles, and initiatives related to the prohibition of conflict minerals, as well as TCL Zhonghuan's Conflict Minerals Management Policy. Partners shall verify that their products do not use materials from conflict-affected areas (such as the Democratic Republic of the Congo (DRC) and its neighboring and surrounding regions (Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, Angola, the Central African Republic, etc.)), trace the source of ores including gold (Au), tantalum (Ta), tin (Sn), tungsten (W), cobalt (Co), mica, copper (Cu), aluminum (Al), and silicon (Si) and their derivatives contained in all products, provide relevant information, and actively cooperate with TCL Zhonghuan in conducting conflict minerals due diligence when necessary.

2.5 Occupational Health and Safety

- 1) Partners must, in accordance with the corresponding national and local laws and regulations, identify hazards and risks in the workplace, such as chemicals, noise, and dust. They shall truthfully inform employees of the above situations, provide prescribed and appropriate occupational health and safety training, retain records of such training, and provide complete personal protective equipment. Continuously improve health and safety, eliminate hazards, and minimize risks as much as possible.
- 2) Potential hazards that employees may encounter in the workplace (such as electric shock, fire, mechanical injury, object striking, falling from heights, vehicle injury, etc.) shall be controlled through correct design, engineering technology and management controls, preventive maintenance, safe operating procedures (including lockout/tagout), and continuous safety training. If hazards cannot be effectively controlled through the above methods, appropriate and well-maintained personal protective equipment shall be provided to employees. Safety awareness shall not be improved through disciplinary measures.
- 3) Procedures and management systems shall be formulated to prevent, manage, track, and report occupational injuries and diseases, including the following provisions:
 - a) Encourage employees to report;
 - b) Classify and record injury and disease cases;
 - c) Provide necessary treatment;
 - d) Investigate cases and implement corrective measures to eliminate similar situations;
 - e) Assist employees in returning to work.
- 4) A safe and healthy working environment and protection shall be provided to employees. Work-related injury insurance shall be handled for employees in accordance with the law.

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Active prevention of work-related accidents, regular detection of occupational hazard factors, and occupational health examinations for employees in relevant positions shall be conducted to effectively protect employees' health.

- 5) Emergencies and incidents shall be identified and assessed, and their impact shall be minimized through the implementation of emergency plans and procedures, including: appropriate fire detection and extinguishing equipment, adequate exit facilities, emergency reporting, notification to employees and evacuation procedures, safety training, drills, and recovery plans. Such plans and procedures shall minimize harm to personnel, the environment, and property as much as possible.

2.6 Community Integration

Partners shall maintain good communication and cooperative relations with the communities where they operate, respect the local culture, traditions, and beliefs, and respect the right to informed consent of communities and residents. We encourage Partners to actively participate in activities of the communities where they operate, promote community development, and contribute to community progress to promote the sustainable development of society and the economy.

2.7 Environmental Responsibility

Partners shall comply with all applicable national and local environmental protection laws, regulations, permits, emission standards, etc., fulfill commitments to sustainable development, pollution prevention, and resource conservation, and are encouraged to jointly abide by TCL Zhonghuan's Environmental Management Policy and Biodiversity Conservation Policy. At all stages of manufacturing, Partners shall ensure a high level of environmental protection, including proactively preventing or reducing accidents that may adversely affect the environment, emphasizing the application and continuous research and development of resource-saving technologies. Core strategies include reducing emissions, saving water and energy, using recycled materials and renewable raw materials, as well as the reuse and recycling of materials. Specific requirements include the following:

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- 1) Formulate environmental protection management policies and mechanisms, establish relevant procedures and management systems for environmental protection, and clarify the responsibilities of senior management, various departments, and positions.
- 2) Proactively identify climate change risks and opportunities related to operational activities. Management shall regularly review and supervise environmental performance goals and action strategies to comprehensively improve climate governance capabilities.
- 3) Proactively implement climate transition plans, identify and manage climate-related risks and opportunities, conduct a comprehensive review of their own energy structure, engage third-party institutions to inventory greenhouse gas emissions (such as carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) in all links of operations as needed, set carbon emission reduction targets, achieve green and low-carbon transformation through methods such as the use of renewable energy (such as hydropower, wind energy, solar energy, geothermal energy, biomass energy, etc.), improving energy efficiency, and lean manufacturing, and regularly review and supervise the implementation of targets and actions. Partners are encouraged to set emission reduction targets in line with the Science Based Targets initiative (SBTi) and disclose carbon reduction progress regularly.
- 4) Partners shall actively promote low-carbon product design, cooperate with TCL Zhonghuan to complete product carbon footprint accounting and certification when necessary, and work with TCL Zhonghuan to continuously reduce product carbon footprint based on the accounting results.
- 5) Attach great importance to the sustainable use of water resources, conduct a comprehensive assessment and analysis of the current status of water resource development and utilization, the rationality of water use, the potential impact of water intake, and protection measures at the production and operation locations, and adopt reasonable water intake measures. Identify key links in production and operation with high water consumption and large sewage discharge, and set corresponding water-saving targets and action plans. Partners operating in high water stress areas shall formulate water resource management plans, including water-saving targets, recycling measures, and emergency plans.
- 6) In accordance with the requirements of relevant laws and regulations, install corresponding purification equipment to treat acid waste gas, alkaline waste gas, organic waste gas, dust, etc. generated in the production process to ensure that all air pollutants are discharged up to standard.

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- 7) Identify all wastes generated in production and operation, including hazardous waste, non-hazardous waste, and sewage, and handle them classified by waste type. Entrust qualified units to carry out timely transportation and disposal, and register through the environmental protection department's hazardous waste transfer management platform before disposal. Conduct audits of the qualifications and technical capabilities of entrusted units and perform regular inspections, and track the transportation and disposal of each batch of transferred waste, especially hazardous waste.
- 8) Strengthen environmental protection publicity and training and education to improve employees' environmental awareness, improve resource utilization efficiency, and reduce resource consumption.
- 9) Comply with all applicable laws and regulations on the prohibition or restriction of specific substances, ensure that all products and manufacturing processes do not contain substances in the customer's restricted substances and hazardous substances list, and make every effort to obtain environmental certification and comply with relevant regulations; at the same time, strictly implement hierarchical management and control of hazardous substances, gradually promote replacement and comprehensive reduction, and systematically reduce the environmental impact of products during use and at the end of their life cycle.
- 10) Identify and control chemical substances and other substances released into the environment that may cause hazards, and ensure that these substances are safely handled, transported, stored, used, recycled or reused, and disposed of.
- 11) Obtain, maintain, and update all necessary environmental protection-related permits, register on the corresponding platforms, and comply with their use and declaration requirements.
- 12) Attach importance to the protection of the ecological environment, biodiversity, and land in project development, construction, and operation activities, and avoid felling forests unless absolutely necessary.
- 13) When necessary, TCL Zhonghuan may require Partners to obtain certifications such as ISO 14001 Environmental Management System and ISO 50001 Energy Management System.

2.8 Competition and Fair Trade

Partners must comply with all applicable laws related to anti-monopoly and anti-unfair competition. They are prohibited from engaging in monopolistic or unfair competition behaviors alone or in collusion with other competitors. Prohibited behaviors include but are not limited to

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dividing markets through agreements or collusion, fixing resale prices, collusive bidding, tied selling, and abusing market dominance. Such behaviors will hinder fair trade and infringe on the rights and interests of end users.

2.9 Marketing and Promotion

In marketing and promotion activities, Partners shall not make false statements or exaggerate product functions. In external business transactions, they shall not provide inaccurate or misleading information to any party.

2.10 Legal Acquisition and Use of Competitive Information

Partners shall not adopt any illegal or unethical means to obtain and use others' trade secrets or confidential information, including but not limited to improperly collecting or receiving confidential information from customers, competitors' employees, or other parties.

2.11 Anti-Bribery and Anti-Corruption

Bribery refers to any direct or indirect improper material or intangible benefits provided by Partners or their employees to TCL Zhonghuan personnel and their associated persons for the purpose of obtaining or maintaining cooperation with TCL Zhonghuan and the benefits of such cooperation.

Partners shall not directly or indirectly offer or promise to offer bribes to government agencies, public institutions, political parties and organizations, state-owned enterprises, other business entities, or the staff of the above-mentioned institutions (including their family members) for the purpose of obtaining or retaining business, influencing decision-makers' decisions, etc., nor shall they accept bribes, pay facilitation fees, engage in extortion, or misappropriate public funds. This includes not providing any excessive or inappropriate gifts, business entertainment, employment opportunities, etc., for the purpose of obtaining improper or illegal interests. When cooperating with the above-mentioned entities or individuals, Partners must comply with applicable government procurement and bidding laws and regulations.

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Partners shall not directly or indirectly bribe or provide improper benefits to TCL Zhonghuan personnel and their associated persons in any form, including but not limited to gifts of cash, items, securities and payment vouchers, checks, credit card gifts, samples, entertainment tickets, membership cards, rebates, commissions, handling fees in the form of currency or goods, expense reimbursement, employment or property acquisition, communication equipment, means of transportation, high-value cultural supplies, and other valuable items, or travel, high-standard reception, and meetings held in scenic areas for entertainment and travel purposes. Partners shall not bribe through TCL Zhonghuan employees or third parties.

Partners and their personnel shall not provide any form of loans to TCL Zhonghuan personnel and their associated persons at any time. If TCL Zhonghuan employees or their associated persons request loans from Partners in the course of daily business, Partners shall report to TCL Zhonghuan's Audit Department in their real names.

Partners must support TCL Zhonghuan's integrity building. If TCL Zhonghuan personnel engage in solicitation of bribes in business transactions, Partners must refuse and promptly complain or report to TCL Zhonghuan's Audit Department. We promise to strictly keep confidential the personal information of all information providers and all provided materials. If a Partner fails to refuse or report a solicitation of bribes by TCL Zhonghuan personnel and meets their requirements, it shall be deemed a bribery act by the Partner, and the Partner shall bear corresponding responsibilities in accordance with the provisions of this Code of Conduct. Moderate reception or business etiquette must comply with applicable anti-bribery laws and business practices.

2.12 Conflicts of Interest

Partners shall avoid conflicts of interest with TCL Zhonghuan and must proactively disclose and properly handle employees involved in conflicts of interest.

Partners shall not allow current TCL Zhonghuan employees or their associated persons to hold shares in their enterprises. If current TCL Zhonghuan employees or their associated persons hold positions such as employees, consultants, directors, senior management, or shareholders in Partners, Partners must immediately report to TCL Zhonghuan.

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During the cooperation period, Partners must avoid conflicts of interest with TCL Zhonghuan. If TCL Zhonghuan employees or their immediate family members are employed, engaged, or hold ownership interests in Partners, the relevant situation shall be disclosed in a timely manner. If a Partner has a legal associated relationship with the shareholders, directors, general managers, other key decision-makers of a TCL Zhonghuan customer, or the associated persons of the above-mentioned personnel, the Partner shall withdraw from TCL Zhonghuan's projects involving that customer.

During the cooperation period, Partners are prohibited from establishing companies jointly with any TCL Zhonghuan employees or relevant persons, or allowing them to hold shares in Partners in their own names or through third-party nominees (except for (i) holdings through publicly traded securities markets with a shareholding ratio of less than 5% of the outstanding share capital; (ii) holdings through funds without actual control rights; (iii) holdings through trusts whose beneficiaries are persons other than the employee or their associated persons). Partners shall not allow TCL Zhonghuan employees or their associated persons to obtain improper benefits from them. If a Partner has a legal associated relationship with any shareholders, directors, general managers, or other key decision-makers of a TCL Zhonghuan customer, or any relatives of the above-mentioned personnel, the Partner shall avoid participating in TCL Zhonghuan's relevant projects involving that customer. For the purpose of this article, relevant persons usually include employees' close relatives (such as spouses, direct blood relatives, collateral blood relatives within three generations, and close relatives by marriage); persons acting in concert with employees or their close relatives (natural persons or legal persons having partnership, cooperative, or associated relationships with employees); and other specific associated persons having common interests with employees or their close relatives, all of whom shall be deemed as employees' associated persons.

2.13 Anti-Money Laundering

TCL Zhonghuan strictly complies with all applicable laws and regulations and fully implements anti-money laundering management requirements. Partners shall not participate in any form of money laundering activities, shall not legalize illegal funds through concealment, disguise, or other means, and shall not make payments to non-transaction accounts or accounts for non-

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normal business purposes; at the same time, they shall strictly prohibit establishing or maintaining business cooperative relationships with customers and partners engaged in illegal fund use.

2.14 Prohibition of Unauthorized Commitments

Partners shall not make commitments to end users or any third parties beyond their authorized scope. If a Partner discovers that a TCL Zhonghuan employee has made an unauthorized commitment, it shall immediately refuse and directly report to TCL Zhonghuan's Audit Department.

Any losses caused by a Partner making unauthorized commitments or failing to refuse unauthorized commitments made by TCL Zhonghuan employees shall be borne solely by the Partner. If such behavior causes losses to TCL Zhonghuan, the Partner that made the unauthorized commitment and the relevant TCL Zhonghuan employee shall compensate TCL Zhonghuan for the losses.

To effectively prevent unauthorized commitments, Partners shall acknowledge and confirm that TCL Zhonghuan only fulfills the terms clearly agreed in the jointly signed agreements/orders, and does not recognize any content beyond the agreed terms.

2.15 Reputation Protection

Partners must uphold the principle of integrity in operations and shall not make false, misleading, or defamatory statements about TCL Zhonghuan. At the same time, they are prohibited from making false or misleading statements about competitors and their products and services.

2.16 Provision of True Information

Partners must ensure that all materials and information provided to TCL Zhonghuan (including but not limited to performance, qualifications, operating conditions, orders, sales reports, payment applications, and changes in major company matters) are true, accurate, complete, legal, and valid. If the materials involve third-party confidential information, Partners shall ensure that they have obtained the third party's authorization.

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Partners are prohibited from assisting TCL Zhonghuan employees in confirming false income, recognizing income in advance, or intentionally delaying income recognition through false projects, exaggerated customer needs, signing dual contracts, providing false delivery orders, false acceptance documents, etc. They are prohibited from forging or improperly using TCL Zhonghuan's official seals and documents in any form.

2.17 Cybersecurity and Information Security

Partners must strictly comply with applicable laws and regulations related to cybersecurity and personal information protection and shall not infringe on end users' freedom of communication and right to privacy. Partners shall responsibly handle the personal data of employees, customers, suppliers, consumers, and other relevant parties, strictly comply with globally applicable data protection regulations when collecting, storing, processing, transmitting, and sharing personal information, and have implemented a number of security measures to ensure the security of such information. Partners shall take sufficient measures to ensure that their business activities related to TCL Zhonghuan comply with all applicable laws and regulations. Partners shall strengthen the construction of information security capabilities, enhance information security facilities, improve employees' information security awareness, and minimize and reduce information security incidents as much as possible.

2.18 Confidentiality

Partners shall commit that during the period of conducting business with TCL Zhonghuan, all information obtained, including but not limited to information related to TCL Zhonghuan's business, operations, and strategies, shall be regarded as confidential, sensitive, and proprietary information. Unless specially authorized by TCL Zhonghuan or required by relevant legal provisions, they shall not disclose or transmit any confidential, sensitive, or proprietary information related to TCL Zhonghuan to unauthorized third parties, the public, or the media.

2.19 Intellectual Property and Confidential Information

Partners shall respect TCL Zhonghuan's intellectual property rights. In addition, without the prior consent of TCL Zhonghuan, they shall not disclose any confidential information obtained in the course of normal transactions with TCL Zhonghuan, nor shall they disclose details of cooperation

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projects with TCL Zhonghuan to the media without authorization. If a Partner intends to use TCL Zhonghuan's trademarks, logos, names, or project materials in relevant promotions, advertisements, publications, or as marketing cases, it must consult with TCL Zhonghuan in advance and obtain written consent before implementation.

2.20 Compliance Management

Establishment of Compliance Program

TCL Zhonghuan encourages Partners to establish their own compliance management program to better comply with applicable laws, uphold ethical business practices, and meet TCL Zhonghuan's relevant policies.

Dissemination of TCL Zhonghuan's Code

Partners shall disseminate this Code of Conduct to their upstream and downstream partners or formulate similar normative documents that meet or even exceed the standards of this Code.

Strict Employee Management

Partners shall strictly regulate the behavior of their own employees and ensure that employees fully understand and comply with internally formulated business conduct codes through internal communication and training, and supervise employees to comply with this Code of Conduct. Partners shall establish effective employee reporting channels to encourage employees to report violations.

Audit and Cooperation

Subject to applicable laws and confidentiality obligations, Partners must cooperate with reasonable compliance or audit requests put forward by TCL Zhonghuan.

2.21 Supplier ESG Performance Evaluation

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TCL Zhonghuan will comprehensively consider Partners' performance in labor rights, health and safety, environmental protection, business ethics, etc., in supplier selection, performance evaluation, and cooperation renewal. Partners shall cooperate with TCL Zhonghuan in conducting ESG performance evaluations, including but not limited to providing relevant data, accepting on-site inspections, and participating in questionnaires. The results of ESG performance evaluations will serve as an important basis for TCL Zhonghuan's decisions. If a supplier fails to meet the minimum ESG requirements within the specified time, no contract will be signed. Among suppliers that meet the minimum ESG requirements, where other conditions are comparable, those with better ESG performance will be preferred.

2.22 Supply Chain Audit, Traceability, and Extended Management

Suppliers shall regularly conduct self-audits on their compliance with this Code or entrust qualified independent third parties to conduct external audits, continuously track the implementation of this Code, and regularly report their compliance performance and improvement to TCL Zhonghuan.

At the same time, subject to applicable laws and confidentiality obligations, suppliers' compliance with this Code shall be subject to review by TCL Zhonghuan as appropriate, including on-site assessments conducted by TCL Zhonghuan (second-party assessments), external audits entrusted to qualified independent third parties (including but not limited to audits on worker recruitment and participation in specific government labor programs), and confidential interviews with workers. If a Partner has operational risks such as non-compliance with labor or trade regulations, TCL Zhonghuan may require it to provide additional evidence to show that its supply chain has eliminated such types of risks by demonstrating supply chain traceability¹. For non-compliance items identified during the audit, suppliers shall implement correction plans within a certain period to meet the requirements, and TCL Zhonghuan will provide guidance and support as needed.

¹ Whether additional evidence is required is at the discretion of TCL Zhonghuan, but in most cases, Partners need to establish systematic traceability measures to ensure that products can be traced back to their raw material sources.

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In addition, TCL Zhonghuan encourages Partners to establish a supply chain compliance management program. Partners shall ensure that themselves and upstream suppliers (including but not limited to secondary suppliers, tertiary suppliers, and key raw material suppliers) comply with the requirements of this Code of Conduct or equivalent standards. Partners shall regularly conduct compliance risk assessments on their upstream suppliers and take appropriate measures (such as on-site audits, document reviews, self-assessment questionnaires, etc.) to ensure their compliance status. TCL Zhonghuan has the right to require Partners to provide compliance certificates of their upstream suppliers and conduct extended audits of Partners' supply chains when necessary.

2.23 Import, Export, and Trade Laws

Partners' business activities must comply with applicable export control-related laws and regulations. These laws include embargoes, export controls on tools containing "dual-use" sensitive items, anti-boycott regulations, and prohibitions on conducting transactions or business cooperation with sanctioned countries or sanctioned entities. Such laws and regulations apply to many aspects of TCL Zhonghuan's business, not limited to the actual import and transportation of products (for example, they may apply to cross-border technology transfers).

3. Breach and Communication

3.1 Consequences of Breach

If any Partner fails to fully implement or violates the above Code of Conduct, both parties may conduct online or offline meetings to communicate. TCL Zhonghuan will, based on its own experience, jointly discuss improvement plans, rectification actions, or remediation plans with the Partner, and re-sign this Code of Conduct for filing within the time limit specified in the meeting. Material breaches of this Code by Partners, as well as failure to cooperate with rectification or unsatisfactory rectification, may lead to the suspension or termination of the business relationship, and TCL Zhonghuan shall not be liable for breach of contract. TCL Zhonghuan shall be entitled to report illegal acts to the relevant authorities. If any Partner violates any of the above Code of Conduct, TCL Zhonghuan shall be entitled to unilaterally terminate or gradually terminate the cooperation without any liability for breach of contract, include such Partner in TCL Zhonghuan's integrity blacklist, and report to the relevant administrative law enforcement or judicial authorities

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for clues involving illegal or criminal activities. At the same time, TCL Zhonghuan reserves the right to pursue compensation from the Partner for all losses caused to TCL Zhonghuan due to the violation of this Code of Conduct, including but not limited to increased costs due to the replacement of Partners and fines imposed by government departments.

If a Partner or its personnel violates this Code of Conduct by engaging in commercial bribery or providing improper benefits to TCL Zhonghuan personnel or their associated persons, it shall return the improper benefits obtained through the bribery act and pay a one-off liquidated damages of RMB 100,000 or 30% to 50% of the amount of the order (contract) involved in the breach, whichever is higher, depending on the severity of the circumstances.

Partners shall pay the liquidated damages within 5 working days from the date of discovering the breach. If not paid in a timely manner, TCL Zhonghuan shall be entitled to deduct it directly from any payable amounts. If a Partner proactively provides valid information to TCL Zhonghuan, we will consider giving the Partner an opportunity to continue cooperation and/or reduce or exempt the above liability for breach of contract based on the actual situation. TCL Zhonghuan has full discretion and autonomy in handling the above situations.

The modification or termination of the business relationship between the two parties shall not affect TCL Zhonghuan's right to pursue legal liability and claim compensation from the Partner in accordance with the provisions of this Code of Conduct.

3.2 Communication and Version Updates

During the signing period, Partners shall check and confirm each clause of the above Code, provide supplementary explanations in an appendix for unmet clauses and return the appendix to TCL Zhonghuan. They shall not conceal or forge relevant content. TCL Zhonghuan reserves the right to supplement and revise this Code of Conduct at any time. Partners agree that all currently effective versions of TCL Zhonghuan's Partner Code of Conduct shall apply. TCL Zhonghuan will notify Partners of any updates to this Code of Conduct through appropriate advance notice or announcement on the official website.

3.3 Appeal Mechanism and Complaint Channels

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TCL Zhonghuan requires all Partners to establish inclusive and convenient complaint channels for employees, which shall provide local language support and be accessible through various means such as email and manual telephone. We are committed to identifying potential risks in a timely manner through regular reviews of employees' feedback from Partners and implementing effective improvements before problems escalate. At the same time, we will continuously update this Code and make it public on the official website. All stakeholders are welcome to contact us through official channels to put forward opinions and suggestions.

If a Partner has any questions about this Code or discovers any violations of this Code based on good faith and reasonable suspicion, it may provide feedback through the following complaint channels, either publicly or anonymously:

Audit Department Reporting Channels:

Telephone: +86-022-23789766-8022

Email: jubao@tzeco.com

Address: No. 10 Haitai South Road, Huayuan Industrial Park, Tianjin, China

3.4 TCL Zhonghuan's Commitment and Reminder

TCL Zhonghuan solemnly commits to strictly keeping confidential the personal information of informants and effectively safeguarding the legitimate rights and interests of informants. TCL Zhonghuan strictly prohibits internal personnel from discriminating against, harassing, intimidating, or retaliating against informants in any direct or indirect manner.

TCL Zhonghuan reminds informants to ensure the authenticity and accuracy of the feedback information. If necessary, informants may be required to assist TCL Zhonghuan in conducting internal investigations and verifications of the provided information. If the feedback information is misleading or maliciously defamatory, TCL Zhonghuan may immediately terminate cooperation with the informant.

4. Governing Law and Dispute Resolution

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This Code shall be governed by and construed in accordance with the laws agreed upon in the relevant contracts between TCL Zhonghuan and Partners. If there are no relevant provisions in the contract or if a specific contract has not yet been signed, both parties shall be subject to the laws of China and submit to the Shenzhen Court of International Arbitration (SCIA), with Shenzhen as the place of arbitration, in accordance with the current effective arbitration rules of the institution at the time of filing for arbitration. The arbitration award is final and binding on both parties.

5. Other Matters

5.1 Effectiveness

This Code of Conduct shall take effect from the date of signing or express acceptance by the Partner and shall remain valid for the duration of the business cooperative relationship.

5.2 Counterparts

This Code may be signed in counterparts (including electronic form), and each counterpart shall be deemed as the original.

5.3 Confirmation and Acceptance

The undersigned confirms that the Partner has read, understood, and agreed to comply with all clauses of the TCL Zhonghuan Partner Code of Conduct.

This confirmation applies to the Partner and its employees, representatives, contractors, and any other persons acting on behalf of the Partner in connection with conducting business with TCL Zhonghuan New Energy Technology Co., Ltd. and its affiliated companies.

_____No text below, signature page_____

Partner: _____

[Fill in the legal name of the Partner and affix the official seal]

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Signature: [manual signature] _____

Name: [type] _____

Position: _____

Date: _____

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