

TZE Conflict Minerals Policy

1. Introduction

TCL Zhonghuan Renewable Energy Technology Co., Ltd. and its subsidiaries (referred to as "TZE", "we" and "the company") are committed to promoting responsible supply chain management, taking "Prohibiting the use of conflict minerals" as an integral part of the responsible procurement management system, integrating it into our supplier certification, supervision and audit, requiring all partners to comply with this management policy, promoting cooperation between upstream and downstream enterprises in the supply chain to conduct supply chain investigations, and jointly promote responsible mineral procurement.

2. Scope

This Policy is applicable to TZE and its subsidiaries. All business partners are encouraged to comply with this Policy.

Conflict minerals in this policy refer to Tin, Tungsten, Tantalum and Gold (3TGs) and other minerals and their derivatives originating from conflict areas in the Democratic Republic of Congo (DRC) and surrounding countries. Conflict areas refer to conflict affected areas designated by the rules (the "Rule") implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the "Dodd-Frank Act"), adopted by the U.S. Securities and Exchange Commission (the "SEC").

3. Commitment

We promise to abide by the United Nations Global Compact, Chapter 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act of the Securities and Exchange Commission (SEC), the three principles of "responsible procurement of conflict minerals" proposed in the EU Conflict Minerals Regulations, and the Organization for Economic Cooperation and Development (OECD) Responsible Chain Due Diligence Guide for Minerals from Conflict Affected and High Risk Areas, Responsible Minerals Initiative (RMI), China Chamber of Commerce for Import and Export of Minerals and Chemicals (CCCMC), China Responsible Mineral Supply Chain Due Diligence Management Guide and other domestic and foreign applicable laws, regulations and principle initiatives. We are committed to proactively eliminating conflict minerals from our products and supply chain, and we are committed not to sourcing minerals from conflict areas in the Democratic Republic of Congo (DRC) and adjoining countries, but only to sourcing minerals from certifiable conflict free areas.

4. Strategy

TZE has established a formalized conflict minerals management mechanism to prohibit the purchase and use of conflict minerals.

4.1 Due diligence: Regularly conduct supply chain conflict minerals-related due diligence to track, identify and assess whether there is a risk of conflict minerals being used in the supply chain.

4.2 Supplier management: Suppliers are required to sign the Letter of Commitment on Not Using Conflict Minerals, and incorporate the relevant provisions on prohibited conflict minerals into the ESG Code of Conduct for Partners of TZE, requiring partners including suppliers not to purchase, use or sell conflict minerals, and to prove that their products do not contain conflict minerals.

4.3 Training and education: Staff will be trained to increase their awareness and understanding of conflict minerals issues.

4.4 Continuous improvement: Mechanisms for the management of conflict minerals will be periodically reviewed and improved to ensure the efficiency of Mechanisms.

5. Consequences of Supplier Non-Compliance

If suppliers and other stakeholders are found to have violated this policy in their cooperation with TZE, we will take immediate measures, including suspending cooperation, rescinding contracts and requiring them to compensate for economic and reputation losses.

6. Policy review

This policy was approved by the company's General Manager in April 2024. This Conflict Minerals Policy shall be updated and revised in a timely manner or at least every three years.

This policy is published on the official website of TZE for all stakeholders to review, and the implementation of the policy and related key performance indicators will be disclosed annually in the company's Sustainability Report.

TCL Zhonghuan Renewable Energy Technology Co., Ltd.

General Manager SHEN Haoping

April 2024