高景太阳能
Gokin Solar

高景太阳能股份有限公司
受控文件

SSI ESG 标准与 SCT 标准管理手册

SSI ESG and SCT Standards Management Manual

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审核会签
Review countersigning

部 门 Departments	评审人 Reviewed by	部 门 Departments	评审人 Reviewed by	部 门 Departments	评审人 Reviewed by
综合管理中心	李杨	晶硅事业部	付明全	运营支持中心	孙彬
组件事业部	高彬彬	全球物流&外事中心	徐自寒	供应链管理中心	汪奇
财经中心	罗燕军&邓慧平	人力资源管理中心	周颖	商务中心	周建国
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批 准 Approved by：徐志群

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发布令
Publication Order

为严格遵守 SSI（Solar Stewardship Initiative 太阳能管理倡议）最新标准规范，全面落地SCT供应链可追溯体系与ESG可持续发展管理体系一体化管控要求，满足全球客户合规审核、SSI会员年度上报、第三方认证及出口市场监管要求，规范公司全硅链路溯源管理、人权劳工、环境保护、绿色生产、供应链合规管控流程，公司依据 SSI-SCT、SSI-ESG 标准及相关法律法规、行业准则，结合公司生产经营及供应链实际情况，组织编制完成 SSI-ESG 标准与 SCT 标准管理手册（版本号：A/0）。

To ensure strict compliance with the latest standards of the Solar Stewardship Initiative (SSI), fully implement the integrated management requirements of the Supply Chain Traceability (SCT) system and the ESG sustainability management system, meet the requirements of global customer compliance audits, annual SSI member reporting, third-party certification and export-market regulation, and standardize the Company's full silicon value-chain traceability, human and labor rights, environmental protection, green production and supply chain compliance processes, the Company has prepared this SSI ESG and SCT Standards Management Manual (Version A/0). The Manual is based on the SSI SCT and SSI ESG standards, applicable laws and regulations, industry guidelines, and the actual conditions of the Company's operations and supply chain.

本手册是公司 SSI 全体系合规管理的纲领性、法规性文件，统一规范公司从石英矿、冶金硅、多晶硅、硅片、电池到组件全链条追溯管控标准，明确 ESG 环境、社会、治理及劳工人权、反强迫劳动、绿色低碳、供应链合规管理要求，界定各部门岗位职责、管控流程、风险防控及持续改进准则，适用于公司所有生产厂区、产品出口业务、上下游供应链合规管控及各类 SSI 合规审核、客户验厂、第三方认证工作。

This Manual is the Company's governing document for SSI-wide compliance management. It standardizes traceability controls across the full value chain from quartz mines, metallurgical-grade silicon and polysilicon to wafers, cells and modules. It specifies requirements for environmental, social and governance management; labor and human rights; prevention of forced labor; green and low-carbon operations; and supply chain compliance. It also defines departmental responsibilities, control processes, risk prevention measures and continuous improvement criteria. The Manual applies to all Company production sites, export operations, upstream and downstream supply chain compliance controls, SSI compliance audits, customer factory audits and third-party certifications.

经最高管理层审核，本手册内容完整、合规适配、贴合公司实际，能够有效支撑公司 SSI 铜级/银级/金级追溯体系建设、2026-2028 年 SSI 分阶段认证与出货合规目标落地，现正式批准发布并全面实施。

Following review by senior management, this Manual has been confirmed as complete, compliant and appropriate to the Company's actual operations. It supports the development of the Company's SSI Bronze, Silver and Gold traceability systems and the delivery of its phased SSI certification and shipment-compliance objectives for 2026-2028. The Manual is hereby approved, issued and implemented in full.

现要求公司各部门、全体员工严格遵照本手册各项规定执行，全面落实 SSI 追溯与 ESG 合规管控要求，常态化开展体系运行、自查整改、培训宣贯与供应链管控工作，持续优化全链路溯源体系与 ESG 管理水平，确保公司持续满足 SSI 会员资质要求、海外市场准入标准及客户合规要求，实现供应链透明可追溯、生产经营合规可持续。

All departments and employees shall comply strictly with this Manual, fully implement SSI traceability and ESG compliance controls, and routinely conduct system operation, self-assessment, corrective action, training, awareness-building and supply chain control activities. The Company shall continuously improve full-chain traceability and ESG management to maintain SSI membership requirements, overseas market-access standards and customer compliance requirements, and to achieve a transparent and traceable supply chain and compliant, sustainable operations.

本手册由公司 SSI 体系管理者代表负责归口管理、解释修订、运行监督与持续改进，体系标准更新、行业规则迭代或公司经营、供应链发生重大变更时，及时组织手册修订换版，确保手册适宜性、充分性、有效性。

The Company's SSI Management Representative is responsible for the centralized administration, interpretation, revision, operational oversight and continuous improvement of this Manual. The Manual shall be reviewed and revised promptly when system standards or industry rules are updated, or when material changes occur in the Company's operations or supply chain, to maintain its suitability, adequacy and effectiveness.

特此发布，全员遵照执行。

This Manual is hereby issued for compliance by all personnel.

最高管理者（董事长）签字：____________

Signature of Top Manager (Chairman): ____________

SSI 供应链可追溯高层管理者承诺书

Senior Management Commitment to SSI Supply Chain Traceability

一、前言 Introduction

本公司作为 SSI（Solar Stewardship Initiative，太阳能管理倡议）正式制造商成员，充分知晓并认可 SSI 供应链可追溯标准（SCT）、ESG 标准及 SSI 成员约束性目标、年度上报管理要求。公司最高管理层（董事长/总经理）对全链路供应链可追溯体系建设、运行、持续合规承担最终主体责任，郑重作出以下可追溯承诺，接受 SSI 秘书处、第三方认证机构、客户及社会公众监督。

As an official SSI manufacturer member, the Company fully understands and recognizes the SSI Supply Chain Traceability (SCT) Standard, the ESG Standard, binding SSI member targets and annual reporting requirements. Senior management, including the Chairman and General Manager, assumes ultimate accountability for establishing, operating and maintaining compliance of the end-to-end supply chain traceability system. The Company hereby makes the following traceability commitments and accepts oversight by the SSI Secretariat, third-party certification bodies, customers and the public.

二、承诺内容 Commitments

（一）战略与资源保障承诺 Strategy and Resource Assurance

1) 将 SSI 全链路可追溯管控纳入公司顶层可持续发展战略、年度经营考核，明确追溯合规为海外欧盟、瑞士、英国市场出货前置硬性条件；严格落实 SSI 分阶段认证目标：2026 年完成至少 2 处生产基地 ESG+追溯双认证，2027 年 80%出口组件产自 SSI 认证厂区，2028 年实现 100%出口组件溯源合规。

   The Company shall incorporate end-to-end SSI traceability controls into its overarching sustainability strategy and annual operating performance assessments, and treat traceability compliance as a mandatory prerequisite for shipments to the European Union, Switzerland and the United Kingdom. The Company shall meet its phased SSI certification targets: complete dual ESG and traceability certification for at least two production sites in 2026; source 80% of exported modules from SSI-certified sites in 2027; and achieve traceability compliance for 100% of exported modules in 2028.

2) 足额配置专项资金、数字化系统、专职追溯管理团队，搭建覆盖石英矿→冶金硅→多晶硅→硅片→电池→组件全链条数字化溯源平台，保障物料隔离、批次编码、权属链档案长期稳定运行。

The Company shall allocate sufficient dedicated funding, digital systems and full-time traceability personnel, and establish a digital traceability platform covering the entire chain from quartz mine to metallurgical-grade silicon, polysilicon, wafer, cell and module. The Company shall ensure the stable, long-term operation of material segregation, batch coding and chain-of-custody records.

3) 授权质量/供应链/ESG 管理部门独立开展追溯内审、供应商合规核查，管理层不干预真实追溯数据记录、不合规问题上报与整改闭环。

The quality, supply chain and ESG functions are authorized to conduct traceability internal audits and supplier compliance reviews independently. Management shall not interfere with accurate traceability records, the reporting of non-conformities or the closure of corrective actions.

（二）全链路权属链（CoC）管控承诺 End-to-End Chain of Custody (CoC) Controls

1) 严格执行 SSI 隔离式保管链模式，对上游硅原料分认证类型、多晶硅供应商、到货批次存放、独立唯一批次编码绑定，杜绝不同合规等级、不同矿源物料混料交叉，完整留存每一批次物料采购、运输、加工、出库全流程权属流转记录。

Strictly implement the SSI isolation storage chain model. For the upstream silicon raw materials, they should be classified by certification type, multi-crystalline silicon suppliers, and stored by individual batches. Each batch should be bound with an independent and unique batch code. This ensures that materials of different compliance levels and from different sources are not mixed and cross-used. Complete records of the ownership transfer throughout the entire process of material procurement, transportation, processing, and outbound should be retained for each batch.

2) 按 SSI 三级追溯梯度落地管控：基础达成铜级追溯（至多晶硅），中长期冲刺银级、金级穿透追溯（直达石英矿山）；完整留存矿源开采证明、供应商人权/低碳合规文件、物流单据、加工台账，追溯档案保存周期不少于产品全生命周期+5 年。

The Company shall implement SSI's three-tier traceability framework: achieve Bronze traceability to the polysilicon stage as a baseline, and work toward Silver and Gold traceability extending to the quartz mine over the medium and long term. Mine-source extraction evidence, supplier human-rights and low-carbon compliance documents, logistics documents and processing records shall be retained in full. Traceability records shall be kept for at least the product's full life cycle plus five years.

3) 建立上游供应商准入与动态考核机制，要求所有硅料、辅材供应商配合完成矿源溯源资料提供，对无法提供合规溯源凭证的供应商终止合作。

The Company shall establish supplier onboarding and ongoing performance evaluation mechanisms for upstream suppliers. All silicon and auxiliary-material suppliers shall provide mine-source traceability information. Cooperation shall be terminated with suppliers unable to provide compliant traceability evidence.

（三）数据真实、透明上报承诺 Data Integrity and Transparent Reporting

1) 所有追溯台账、生产产能、厂区清单、认证评估数据真实、完整、无篡改、无隐瞒，不虚构物料来源、不拆分/掩盖不合规批次产品流向。

All traceability ledgers, production-capacity data, site lists and certification-assessment data shall be accurate, complete, unaltered and fully disclosed. Material origins shall not be fabricated, and the flow of non-compliant product batches shall not be split or concealed.

2) 自 2026 年 4 月 1 日起，严格遵循 SSI 强制上报规则，按时向 SSI 秘书处提交全部生产基地清单、厂区年产能、ESG 与追溯标准审核计划及审核结果，完整配合 SSI 年度透明度核查、第三方现场审核。

From 1 April 2026, the Company shall strictly follow SSI mandatory reporting rules and submit to the SSI Secretariat, on time, a complete list of production sites, annual site capacities, ESG and traceability audit plans, and audit results. The Company shall fully support SSI annual transparency reviews and third-party on-site audits.

3) 配合客户、认证机构溯源抽查，在规定时限内提供完整批次溯源链路报告，清晰展示原材料源头、加工工序、成品出货去向，做到来源可查、过程可控、去向可追、责任可究。

The Company shall cooperate with customer and certification-body traceability sampling checks and provide complete batch traceability reports within the required time. Reports shall clearly show raw-material sources, processing steps and destinations of finished products, so that sources can be verified, processes controlled, destinations traced and accountability established.

（四）不合规整改与责任承担承诺 Remediation of Non-Compliance and Accountability

1) 若内审、第三方审核、SSI 核查发现追溯体系漏洞、物料混料、溯源资料缺失、数据造假等不合规项，管理层第一时间启动专项整改，制定纠正预防措施并跟踪验证闭环；涉及违规产品立即隔离管控，暂停对应批次出口出货。

   If an internal audit, third-party audit or SSI review identifies weaknesses in the traceability system, material mixing, missing traceability documents, falsified data or other non-conformities, management shall immediately initiate focused remediation, establish corrective and preventive actions, and verify effective closure. Affected non-compliant products shall be isolated immediately, and export shipments of the relevant batches shall be suspended.

2) 自愿承担 SSI 规则约定的全部违约后果，包括限期整改、限制成员权益、撤销 SSI 会员资质等；因追溯不合规造成客户损失、行业声誉风险、合规处罚，由公司及最高管理层承担全部经济与法律责任。

   The Company voluntarily accepts all consequences for breach specified in SSI rules, including corrective-action deadlines, restriction of membership rights and revocation of SSI membership. The Company and senior management shall bear all economic and legal liabilities arising from customer losses, industry reputational risks or compliance penalties caused by traceability non-compliance.

3) 建立追溯长效改进机制，每年至少开展 1 次全厂区追溯体系内审，每年完成一次 SSI 标准更新培训，持续优化数字化追溯系统，稳步提升追溯认证等级。

   The Company shall establish a long-term traceability improvement mechanism, conduct at least one site-wide traceability internal audits each year, complete annual training on SSI standard updates, continuously enhance the digital traceability system and steadily improve the traceability certification level.

（五）人权与可持续溯源配套承诺 Supporting Commitments on Human Rights and Sustainable Traceability

追溯体系同步绑定 SSI 人权、劳工、环境合规要求，所有可追溯上游矿源、生产厂区杜绝强迫劳动、童工、恶劣开采/生产环境，溯源档案同步留存 ESG 合规佐证材料，实现追溯透明与负责任生产一体化管理。

The traceability system shall integrate SSI requirements on human rights, labor and environmental compliance. Forced labor, child labor and harmful mining or production conditions are prohibited at all traceable upstream mine sources and production sites. Traceability files shall retain supporting ESG compliance evidence to integrate transparent traceability with responsible production.

三、承诺生效说明 Effectiveness of the Commitment

1) 本承诺由公司最高管理者（董事长）签字并加盖企业公章，自签署之日长期有效.

   This Commitment shall be signed by the Company's top manager (Chairman) and affixed with the corporate seal, and shall remain effective from the date of signature.

2) 本承诺作为 SSI 认证、第三方审核、客户供应商准入审核必备文件，存放于质量 ESG 体系文件一级文件，全员公示学习。

   This Commitment is a required document for SSI certification, third-party audits and customer supplier-qualification audits. It shall be maintained as a Level 1 quality and ESG management-system document and communicated to all employees.

签字：________ 徐志群印

Signature: ________

管理者代表及监督负责人任命书
Appointment of the Management Representative and Compliance Supervisor

为全面落实 SSI（Solar Stewardship Initiative 太阳能管理倡议）供应链可追溯标准、ESG 可持续发展标准及成员合规管理要求，建立、实施、保持并持续优化公司 SSI 全链路追溯与 ESG 管理体系，确保公司所有出口产品满足 SSI 认证、年度上报、第三方审核及客户合规要求，经公司最高管理层研究决定，现正式任命：

To fully implement the SSI Supply Chain Traceability Standard, ESG sustainability standards and member compliance requirements; establish, implement, maintain and continuously improve the Company's end-to-end SSI traceability and ESG management systems; and ensure that all exported products meet SSI certification, annual reporting, third-party audit and customer compliance requirements, senior management hereby appoints:

任命岗位：SSI 体系管理者代表;SSI 监督负责人

Appointed Role: SSI Management Representative；SSI Compliance Supervisor

任命人员：李勇（组件 SCT)、苏兆欢(晶硅 SCT）、董力文(ESG)；付明全

Appointee: Li Yong(PV moudule SCT)， Su Zhaohuan(Crystalline Silicon Division SCT)， Dong Liwen(ESG)；Fu Mingquan

SSI 体系管理者代表岗位直接对公司高层管理者负责，独立统筹公司 SSI 供应链追溯、ESG 合规、人权劳工、绿色生产全体系管理工作，不受其他部门干预。SSI 监督负责人岗位拥有跨部门监督、溯源核查、供应商风控、内审整改及外审对接权限，统筹公司硅料溯源、冲突矿产、供应链人权合规全流程管理。现将 SSI 体系管理者代表其核心职责与权限明确如下：

SSI Management Representative reports directly to the Senior management personnel and independently coordinates the Company's SSI supply chain traceability, ESG compliance, human and labor rights, and green production management without interference from other departments. SSI Compliance Supervisor is authorized for cross-department supervision, traceability verification, supplier risk control, internal correction and external audit coordination, governing the full process of polysilicon traceability, conflict minerals and supply chain human rights compliance.The core responsibilities and authorities of SSI Management Representative are as follows:

一、体系搭建与运维职责 System Establishment and Operation

1. 全权负责公司 SSI 供应链可追溯体系、ESG 管理体系的建立、落地运行、日常管控与持续改进，严格对标 SSI 铜级/银级/金级追溯标准及最新版 SSI 合规准则。

1. Assume full responsibility for establishing, implementing, operating, controlling and continuously improving the Company's SSI supply chain traceability and ESG management systems, in strict alignment with SSI Bronze, Silver and Gold traceability requirements and the latest SSI

compliance criteria.

2.统筹制定公司 SSI 年度合规计划、追溯体系升级计划、内审计划、供应商合规管控计划，落实 2026-2028 年 SSI 分阶段出货与认证目标。

2. Coordinate the Company's annual SSI compliance plan, traceability-system upgrade plan, internal audit plan and supplier compliance control plan, and deliver the phased SSI shipment and certification objectives for 2026-2028.

3.维护石英矿-冶金硅-多晶硅-硅片-电池-组件全链条物料隔离、批次编码、权属保管链（CoC）体系，杜绝混料、溯源资料缺失等合规风险。

3. Maintain material segregation, batch coding and chain-of-custody (CoC) controls across the full chain from quartz mine to metallurgical-grade silicon, polysilicon, wafer, cell and module, preventing material mixing, missing traceability documents and other compliance risks.

二、内部管控与培训职责 Internal Controls and Training

1.主导开展公司 SSI 体系内部审核、问题排查、整改闭环，定期组织管理评审，向最高管理层汇报体系运行有效性、存在问题及改进需求。

1. Lead internal audits, issue reviews and corrective-action closure for the Company's SSI system; organize management reviews regularly; and report system effectiveness, identified issues and improvement needs to senior management.

2.负责全员 SSI 标准、追溯规范、ESG 合规、反强迫劳动、绿色生产等内容的宣贯与培训，提升各部门 SSI 合规意识与执行能力。

2. Deliver communication and training to all employees on SSI standards, traceability requirements, ESG compliance, prevention of forced labor and green production, strengthening awareness and implementation capabilities across departments.

3.监督生产、供应链、采购、仓储、质检等各部门严格执行 SSI 追溯管理制度，规范生产台账、物流单据、批次档案、供应商合规资料的留存与归档。

3. Oversee strict implementation of SSI traceability procedures by production, supply chain, procurement, warehousing, quality inspection and other functions, and standardize the retention and filing of production ledgers, logistics documents, batch records and supplier compliance information.

三、供应商与供应链管控职责 Supplier and Supply Chain Controls

1.建立上游硅料、辅材供应商 SSI 溯源准入与动态考核机制，督促供应商提供完整矿源证明、合规溯源资料、ESG 及人权合规文件。

1. Establish SSI traceability onboarding and ongoing evaluation mechanisms for upstream silicon and auxiliary-material suppliers, and require suppliers to provide complete mine-source evidence, compliant traceability records, and ESG and human-rights compliance documents.

2.统筹供应链全链路溯源核查，对不合规供应商、问题物料批次牵头启动整改、隔离、替换工作，规避供应链溯源合规风险。

2. Coordinate end-to-end supply chain traceability reviews and lead the remediation, isolation and replacement of non-compliant suppliers and affected material batches to mitigate supply chain traceability risks.

四、对外对接与上报职责 External Liaison and Reporting

1.作为公司对外 SSI 对接负责人，全权对接 SSI 秘书处、第三方认证机构、海外客户，负责资料提交、信息上报、审核配合、问题答疑等全部工作。

1. Act as the Company's sole external SSI contact and liaise with the SSI Secretariat, third-party certification bodies and overseas customers on document submission, information reporting, audit support and responses to enquiries.

2.严格按照 SSI 时间要求，完成厂区清单、产能数据、追溯台账、审核结果等强制数据上报，确保所有上报数据真实、完整、可追溯、无篡改。

2. Complete mandatory reporting of site lists, capacity data, traceability ledgers and audit results within SSI deadlines, ensuring that all reported data is accurate, complete, traceable and unaltered.

3.全程主导 SSI 现场审核、客户溯源抽查、第三方合规评审工作，统筹问题整改与闭环验证，保障公司 SSI 会员资质持续有效。

3. Lead SSI on-site audits, customer traceability sampling checks and third-party compliance reviews, and coordinate issue remediation and closure verification to maintain the Company's SSI membership in good standing.

五、合规改进与风险管控职责 Compliance Improvement and Risk Control

1.实时跟踪 SSI 标准更新、政策迭代，及时修订公司内部管理制度，适配最新合规要求。

1. Monitor SSI standard updates and policy changes in real time and promptly revise the Company's internal procedures to align with the latest compliance requirements.

2.排查 SSI 体系运行风险，针对物料混批、溯源断链、资料缺失、数据异常、人权环保不合规等问题，制定纠正预防措施，持续优化追溯体系。

2. Identify SSI system risks and establish corrective and preventive actions for mixed material batches, breaks in traceability, missing documents, abnormal data and non-compliance relating to human rights or the environment, continuously improving the traceability system.

3.负责 SSI 不合规事件的处置、上报与整改，最大限度降低公司资质、订单、声誉及合规处罚风险。

3. Manage, report and remediate SSI non-compliance events to minimize risks to the Company's qualifications, orders and reputation and reduce exposure to compliance penalties.

六、专属管理权限 Specific Management Authorities

1.有权统筹、协调、监督公司各部门 SSI 相关工作，对违规操作、拒不配合整改的部门及个人提出考核与处理建议。

1. Coordinate, supervise and oversee SSI-related work across all departments, and recommend performance measures or disciplinary action for departments or individuals that breach requirements or refuse to cooperate with remediation.

2.有权调取全公司生产、采购、仓储、物流、质检、供应商全部溯源与合规资料，独立开展内审与核查工作。

2. Access all Company traceability and compliance records relating to production, procurement, warehousing, logistics, quality inspection and suppliers, and conduct internal audits and reviews independently.

3.有权审批 SSI 体系整改方案、供应商合规处置方案、追溯体系优化方案，自主推进体系改进工作。

3. Approve SSI corrective-action plans, supplier compliance disposition plans and traceability-

system optimization plans, and independently advance system improvements.

特此任命，公司各部门须全力配合其开展各项 SSI 合规管理工作。

This appointment is hereby made. All Company departments shall fully support the appointee in carrying out SSI compliance management responsibilities.

最高管理者签字（董事长）：____________

Signature of Top Manager (Chairman): ____________

1.目的与适用范围 Purpose and Scope

1.1 目的 Purpose

为规范本公司 ESG（环境、社会与治理）管理及供应链可追溯性工作，确保公司运营符合 Solar Stewardship Initiative（SSI）ESG 标准及供应链可追溯性标准的要求，提升公司可持续发展能力，满足客户、监管机构及利益相关方的期望，特制定本手册。

This Manual is established to standardize the Company's environmental, social and governance (ESG) management and supply chain traceability activities, ensure that Company operations meet the requirements of the Solar Stewardship Initiative (SSI) ESG Standard and Supply Chain Traceability Standard, strengthen the Company's sustainability capabilities, and meet the expectations of customers, regulators and other stakeholders.

1.2 适用范围 Scope

本手册适用于本公司从事以下制造活动的所有生产厂址及相关职能部门：

This Manual applies to all production sites and related functions engaged in the following manufacturing activities:

硅棒/硅锭制造

Silicon rod/ingot manufacturing

硅片加工

Wafer processing

光伏组件组装

Photovoltaic module assembly

本手册同时适用于本公司供应链中的供应商、外包承包商及其他业务合作伙伴。

This Manual also applies to suppliers, outsourced contractors and other business partners in the Company's supply chain.

1.3 编制依据 References

序号 No.	标准/文件名称 Standard/Document	版本/发布日期 Version/Publication Date
1	SSI ESG Standard	V1.2，2025 年 7 月 V1.2, July 2025
2	SSI Supply Chain Traceability Standard	V1.0，2024 年 12 月 V1.0, December 2024
3	SSI Assurance Manual	现行有效版本 Current valid version
4	SSI Claims Guide	现行有效版本 Current valid version
5	ISO 22095 Chain of Custody	2020 版 2020 edition
6	OECD Due Diligence Guidance for Responsible Supply Chains	现行有效版本 Current valid version
7	UN Guiding Principles on Business and Human Rights	2011 年 2011
8	GHG Protocol Corporate Accounting and Reporting Standard	现行有效版本 Current valid version

1.4 公司 SSI 认证承诺 Company Commitment to SSI Certification

- 本公司作为 SSI 制造商会员，郑重承诺：公司运营符合所有适用的法律法规，如国家法律与 SSI 标准存在冲突，将在可能的情况下满足更高要求；
  As an SSI manufacturer member, the Company commits to complying with all applicable laws and regulations. Where national law conflicts with an SSI standard, the Company will meet the higher requirement wherever possible.
- 在运营中尊重人权，并承诺在从高风险和冲突地区采购原材料时加强尽职调查；
  The Company shall respect human rights in its operations and conduct enhanced due diligence when sourcing raw materials from conflict-affected and high-risk areas.
- 运营中应用 SSI(ESG)标准要求，并鼓励供应链采用；

The Company shall apply the SSI(ESG) Standard in its operations and encourage its adoption throughout the supply chain.

- 签署 SSI 会员条款后 12 个月内，至少针对两个生产厂址完成 SSI(ESG)标准及可追溯性标准评估，并承诺持续扩大范围；

  Within 12 months of signing the SSI Membership Terms, the Company shall complete assessments against the SSI (ESG) Standard and Supply Chain Traceability Standard at a minimum of two production sites and commit to progressively expanding the scope.

- 获得认证前，不做出任何误导性或未经正式确认的符合 SSI 标准认证的声明；

  Before certification is obtained, the Company shall not make any misleading or unverified claim of certification or conformity with SSI standards.

- 获得认证后，继续遵守 SSI 标准，通过定期评估和报告机制持续改进，并与利益相关方沟通进展情况。

  After certification, the Company shall continue to comply with SSI standards, drive continuous improvement through periodic assessment and reporting, and communicate progress to stakeholders.

2.术语与定义 Terms and Definitions

术语 Term	定义 Definition
SSI	Solar Stewardship Initiative，太阳能管理倡议，由 Solar Power Europe 和 Solar Energy UK 联合创建的多方利益相关者倡议 Solar Stewardship Initiative, a multi-stakeholder initiative jointly established by SolarPower Europe and Solar Energy UK
ESG	Environmental,Social and Governance，环境、社会和治理
SCT	SSI 供应链可追溯性标准（Supply Chain Traceability），旨在确保太阳能价值链中硅材料的来源可追溯。 SSI Supply Chain Traceability Standard, designed to ensure the traceability of silicon materials in the solar value chain.

术语 Term	定义 Definition
CoC	Chain of Custody，监管链，指材料在供应链中物理和法律所有权的记录序列 Chain of Custody, the documented sequence of physical possession and legal ownership of material as it moves through the supply chain
隔离式监管链（Segregated CoC） Segregated Chain of Custody (Segregated CoC)	认证材料在供应链各阶段与非认证材料保持物理分离的监管链模式 A chain-of-custody model in which certified material remains physically separate from non-certified material at every stage of the supply chain
FPIC	Free,Prior and Informed Consent，自由、事先和知情同意
KYC	Know Your Counter party，了解你的交易方
GHG	Greenhouse Gas，温室气体
范围 1 排放 Scope 1 emissions	公司直接产生的温室气体排放 Direct greenhouse gas emissions from sources owned or controlled by the Company
范围 2 排放 Scope 2 emissions	公司外购电力、蒸汽、热力产生的间接温室气体排放 Indirect greenhouse gas emissions from the generation of purchased electricity, steam and heat consumed by the Company
范围 3 排放 Scope 3 emissions	公司价值链中间接产生的温室气体排放 Other indirect greenhouse gas emissions occurring in the Company's value chain
受冲突影响和高风险地区 Conflict-Affected and High-Risk Areas (CAHRAs)	经识别存在武装冲突、大面积暴力活动风险的地区，包括犯罪网络引发的暴行，或其他使人民广泛遭受严重伤害的风险的地区。武装冲突的形式多种多样，如国际冲突或非国际冲突，可能涉及两个或两个以上国家，可能由解放战争、叛乱、内战构成。 Areas identified as experiencing armed conflict or a risk of widespread violence, including atrocities committed by criminal networks or other risks of serious and widespread harm to people. Armed conflict may take various forms, including international or non-international conflict involving two or more states, wars of liberation, insurgencies or civil wars.

术语 Term	定义 Definition
	高风险地区指的是那些爆发冲突、发生大范围或严重侵权行为风险很高的地区。这类地区的特点往往是政局不稳，或存在政治压迫、制度缺陷、不安全因素、民用基础设施崩溃、广泛暴力活动、违反国际国内法律等。 High-risk areas are locations with a high risk of conflict or widespread or severe human-rights abuses. Such areas are often characterized by political instability, political repression, institutional weakness, insecurity, collapse of civil infrastructure, widespread violence, or violations of national or international law.
认证材料 Certified material	经 SSI 认证站点生产并附有有效转移记录的材料 Material produced at an SSI-certified site and accompanied by a valid transfer record
转移记录 Transfer record	证明认证材料在供应链中流转的文件，包含材料描述、数量、批次号等信息 A document evidencing the movement of certified material through the supply chain, including the material description, quantity, batch number and other required information
PPE	Personal Protective Equipment，个人防护装备
SDS	Safety Data Sheet，安全技术说明书
生活工资 Living wage	工人在标准工作周内获得的足以维持体面生活水平的报酬 Remuneration earned during a standard working week that is sufficient to afford a decent standard of living
强迫劳动 Forced labor	以惩罚相威胁，强迫任何人从事非自愿的工作或服务 Any work or service exacted from a person under threat of penalty and for which the person has not offered themselves voluntarily
童工 Child labor	低于法定最低就业年龄的儿童从事的工作 Work performed by a child below the legal minimum age for employment
申诉机制 Grievance mechanism	使利益相关方能够提出关切并获得回应的程序 A process through which stakeholders can raise concerns and receive a response

术语 Term	定义 Definition
利益相关方 Stakeholder	指可能受组织决策、活动影响，或是对组织决策、活动施加影响的所有个人、群体和组织，主要包括监管机构、各级政府、投资人、员工、客户、合作伙伴、供应商、债权人、客户与消费者、媒体、非政府组织、社区公众等。 Any individual, group or organization that may be affected by, or may influence, the decisions and activities of an organization. Stakeholders primarily include regulators, governments at all levels, investors, employees, customers, business partners, suppliers, creditors, clients and consumers, media organizations, non-governmental organizations and local communities.
冲突矿产 Conflict minerals	锡、钽、钨、金的原始矿物，可能为刚果民主共和国 (DRC) 或周边国家提供资金造成冲突，它们通常被称为 3TGs。 Tin, tantalum, tungsten and gold minerals that may finance conflict in the Democratic Republic of the Congo (DRC) or adjoining countries, commonly referred to as 3TGs. 以及符合 SSI 要求的硅材料的管理。 This term also includes the management of silicon materials in accordance with SSI requirements.

3.管理职责　Management Responsibilities

3.1 高级管理层　Senior Management

1) 总经理及高级管理层对本公司 ESG 管理及供应链可追溯性工作负总责，具体职责包括：公开认可并支持 ESG 政策及可追溯性政策，提供必要的财务和人力资源；

   The General Manager and senior management have overall responsibility for the Company's ESG management and supply chain traceability. Their responsibilities include publicly endorsing and supporting the ESG and traceability policies and providing the necessary financial and human resources.

2) 确保本手册在公司范围内得到有效实施；

   Ensure effective implementation of this Manual throughout the Company.

3) 主持年度管理评审，评估 ESG 及可追溯性管理体系的有效性；

   Chair the annual management review and assess the effectiveness of the ESG and traceability management systems.

4) 审批重大 ESG 风险应对策略及改进计划；

Approve response strategies and improvement plans for significant ESG risks.

5) 代表公司对外发布 ESG 相关信息及声明。

Represent the Company in publishing external ESG information and statements.

3.2 战略与可持续发展委员会 Strategic and Sustainability Committee

公司设立战略与可持续发展委员会，作为 ESG 及可追溯性管理的最高决策机构，由总经理担任主席，成员包括各部门负责人。委员会职责：

The Company has established a Strategic and Sustainability Committee as the highest decision-making body for ESG and traceability management. The General Manager serves as Chair, and department heads serve as members. The Committee shall:

1) 制定和审批公司 ESG 战略、目标及行动计划；

Develop and approve the Company's ESG strategy, objectives and action plans.

2) 协调各部门 ESG 及可追溯性工作；

Coordinate ESG and traceability activities across departments.

3) 审议年度 ESG 报告及可追溯性报告；

Review the annual ESG report and traceability report.

4) 处理重大 ESG 风险事件及申诉；

Address significant ESG risk events and grievances.

每年至少召开一次会议，会议记录保存不少于 10 年。

Meet at least once a year and retain meeting records for at least ten years.

3.3 ESG 和可追溯管理代表 ESG and Traceability Management Representative

- 公司指定三名高级管理人员担任 ESG 和可追溯管理代表，全面负责公司 ESG 及可追溯性管理体系的建立、实施和持续改进，具体职责见任命书。

  The Company shall appoint three members of senior management as the ESG and Traceability Management Representative, with overall responsibility for establishing, implementing and continuously improving the Company's ESG and traceability management systems. Detailed responsibilities are specified in the Letter of Appointment.

3.4 各部门职责　Departmental Responsibilities

3.4.1 ESG 部　ESG Department

1) 负责 ESG 及可追溯性管理体系的日常维护；

   Maintain the ESG and traceability management systems on a day-to-day basis.

2) 组织编制和更新相关程序文件和记录表单；

   Organize the preparation and updating of relevant procedures and record forms.

3) 协调内部审核和管理评审；

   Coordinate internal audits and management reviews.

4) 管理 SSI 认证相关文件和记录；

   Manage documents and records related to SSI certification.

5) 跟踪 SSI 标准更新，及时传达至相关部门。

   Monitor updates to SSI standards and communicate them promptly to relevant departments.

3.4.2 溯源组　Traceability Team

1) 负责公司 SSI 供应链可追溯体系落地运行、日常管控与持续改进和实时跟踪，SSI 标准更新、政策迭代，及时修订公司内部管理制度，适配最新合规要求。

   Be responsible for the implementation, daily management, continuous improvement and real-time tracking of the company's SSI supply chain traceability system. Update SSI standards, iterate policies, promptly revise the company's internal management systems to adapt to the latest compliance requirements.

2) 统筹制定公司 SSI 供应链可追溯体系年度计划、内审计划、主导开展公司 SSI 供应链可追溯体系内部审核、问题排查、整改闭环。

   Coordinate the formulation of the company's SSI supply chain traceability system annual plan, internal audit plan, and lead the internal audit of the company's SSI supply chain traceability system, problem investigation, and rectification closure.

3) 负责全员 SSI 追溯规范内容的宣贯与培训，提升各部门 SSI 供应链可追溯意识与执行能力。

Responsible for the dissemination and training of the entire staff on SSI traceability norms, enhancing the awareness and execution ability of each department regarding SSI supply chain traceability.

4) 监督生产、供应链、采购、仓储等各部门严格执行 SSI 追溯管理制度，规范生产台账、物流单据、批次档案、供应商合规资料的留存与归档。

   Supervise all departments, including production, supply chain, procurement, and warehousing, to strictly implement the SSI traceability management system, standardize the retention and archiving of production ledgers, logistics documents, batch archives, and supplier compliance materials.

5) 建立上游硅料供应商 SSI 溯源准入与溯源审核，督促供应商提供完整矿源证明、合规溯源资料文件。

   Establish SSI traceability access and traceability review for upstream silicon material suppliers, and urge suppliers to provide complete source proof and compliant traceability document files.

6) 负责可追溯资料提交、信息上报、审核配合、问题答疑等全部工作。

   Be responsible for all work related to submitting traceability materials, information reporting, review cooperation, and answering questions about problems.

7) 全程主导 SSI 供应链可追溯现场审核、客户溯源抽查、第三方合规评审工作，统筹问题整改与闭环验证，保障公司 SSI 会员资质持续有效。

   Fully lead the on-site audit of SSI supply chain traceability, customer traceability spot checks, and third-party compliance reviews, coordinate problem rectification and closed-loop verification, and ensure the continuous validity of the company's SSI membership qualifications.

3.4.3 EHSS 部 EHSS Department

1) 负责环境管理相关工作，包括温室气体核算、水资源管理、废弃物管理、污染管理、生物多样性管理；

   Manage environmental matters, including greenhouse gas accounting, water, waste, pollution and biodiversity.

2) 负责职业健康与安全管理工作；

Manage occupational health and safety.

3) 组织环境监测和职业健康监测；

Organize environmental and occupational-health monitoring.

4) 管理危险化学品/材料；

Manage hazardous chemicals and materials.

5) 组织应急响应演练。

Organize emergency-response drills.

3.4.4 人力资源管理中心 Human Resources Management Center

1) 负责劳工权益保障工作；

Safeguard labor rights and interests.

2) 组织人权尽职调查；

Organize human-rights due diligence.

3) 管理员工招聘、培训、薪酬福利；

Manage employee recruitment, training, compensation and benefits.

4) 处理员工申诉和劳动争议；

Handle employee grievances and labor disputes.

5) 保存员工档案和培训记录。

Retain employee files and training records.

3.4.5 供应链管理中心 Supply Chain Management Center

1) 负责供应商 ESG 评估和管理；

Conduct supplier ESG assessments and management.

2) 实施 KYC 调查；

Conduct Know Your Counterparty (KYC) checks.

3) 执行负责任采购政策；

Implement the Responsible Sourcing Policy.

4) 保存供应商档案和采购记录。

Retain supplier files and procurement records.

3.4.6 生产部/制造部 Production Department/Manufacturing Department

1) 负责生产过程中的物料隔离和标识；

   Segregate and identify materials during production.

2) 执行物料核算程序；

   Implement material-accounting procedures.

3) 维护生产记录和转移记录；

   Maintain production and transfer records.

4) 配合内部审核和认证评估；

   Support internal audits and certification assessments.

5) 报告生产过程中的异常情况。

   Report abnormalities arising during production.

3.4.7 PMC

1) 负责认证材料的入库、储存和出库管理，订单评审、原材料采购需求、排产；

   Manage the receipt, storage and dispatch of certified materials，Order review, raw material procurement requirements, production scheduling

2) 实施物料隔离措施；

   Implement material-segregation measures.

3) 管理转移记录；

   Manage transfer records.

4) 维护库存记录；

   Maintain inventory records.

5) 配合物料对账工作。

   Support material reconciliation.

3.4.8 财务经营管理部 Finance and Operations Management Department

1) 为 ESG 及可追溯性管理提供预算支持；

   Provide budgetary support for ESG and traceability management.

2) 核算 ESG 相关成本和投资；

Account for ESG-related costs and investments.

3) 配合温室气体排放核算中的财务数据提供；

Provide financial data for greenhouse gas emissions accounting.

4) 管理反腐败相关财务控制。

Manage financial controls relating to anti-corruption.

3.4.9 法务部　Legal Department

1) 识别和跟踪适用的 ESG 相关法律法规；

Identify and monitor applicable ESG-related laws and regulations.

2) 审查 ESG 及可追溯性相关合同；

Review ESG- and traceability-related contracts.

3) 处理法律合规事务；

Handle legal and compliance matters.

4) 协助处理申诉和争议；

Assist with grievances and disputes.

5) 提供法律支持和建议。

Provide legal support and advice.

3.5 员工职责　Employee Responsibilities

1) 遵守本手册及相关程序文件的要求；

Comply with this Manual and related procedures.

2) 参加 ESG 及安全培训；

Participate in ESG and safety training.

3) 正确使用个人防护装备；

Use personal protective equipment correctly.

4) 及时报告发现的风险、事故和不符合项；

Promptly report identified risks, incidents and non-conformities.

5) 积极参与持续改进活动。

Actively participate in continuous-improvement activities.

4.治理与商业道德 Governance and Business Ethics

4.1 法律合规 Legal Compliance

4.1.1 法律法规识别与更新 Identification and Updating of Laws and Regulations

1) 法务部每季度识别和更新公司适用的 ESG 相关法律法规、国际标准和行业规范，建立《适用法律法规清单》；

   Each quarter, the Legal Department shall identify and update the ESG-related laws and regulations, international standards and industry norms applicable to the Company, and maintain a Register of Applicable Laws and Regulations.

2) 清单至少涵盖环境、劳动、人权、反腐败、贸易合规等领域；

   The register shall cover, at a minimum, environmental protection, labor, human rights, anti-corruption and trade compliance.

3) 新颁布或修订的法律法规应在 30 个工作日内传达至相关部门；

   New or revised laws and regulations shall be communicated to relevant departments within 30 working days.

4) 各部门负责评估新法律法规对本部门工作的影响，必要时制定应对措施。

   Each department shall assess the impact of new laws and regulations on its activities and develop response measures where necessary.

4.1.2 许可证与执照管理 Permit and License Management

1) 各部门负责确保本部门业务活动持有有效的相关许可证和执照；

   Each department shall ensure that its activities are covered by valid permits and licenses.

2) 行政部建立《许可证和执照管理台账》，记录许可证名称、编号、有效期、发证机关等信息；

   The Management Systems Department shall maintain a Permit and License Register recording the name, number, validity period, issuing authority and other relevant information for each permit or license.

3) 许可证到期前 60 天，责任部门应启动续期申请程序；

   The responsible department shall initiate the renewal process at least 60 days before a permit or license expires.

4) 未取得有效许可证和执照，不得开展相关业务活动。

No relevant activity may be conducted without a valid permit or license.

4.2 反腐败与反贿赂 Anti-Corruption and Anti-Bribery

4.2.1 政策与制度 Policy and Procedures

公司制定《商业行为准则》《反腐败与反贿赂政策》《廉洁管理规定》，明确禁止以下行为：

The Company shall establish an Anti-Corruption and Anti-Bribery Policy that expressly prohibits:

1) 任何形式的贿赂、回扣和利益输送；

Bribery, kickbacks and improper transfers of benefit in any form.

2) 向政府官员、客户、供应商或其他业务伙伴提供或承诺提供不正当利益；

Offering or promising improper benefits to government officials, customers, suppliers or other business partners.

3) 索取或接受贿赂；

Soliciting or accepting bribes.

4) 便利支付、敲诈勒索和挪用公款；

Facilitation payments, extortion and embezzlement.

5) 洗钱行为。

Money laundering.

6) 该政策适用于全体员工、分包商、供应商及其他代表公司行事的人员。

The Policy applies to all employees, subcontractors, suppliers and other persons acting on behalf of the Company.

4.2.2 培训与承诺 Training and Commitments

1) 审计部每年至少组织一次反腐败培训，覆盖全体员工，并保存培训记录；

Audit Department shall organize anti-corruption training at least annually for all employees and retain training records.

2) 新员工入职培训必须包含反腐败内容；

New-employee orientation shall include anti-corruption content.

3) 所有员工每年接受专项反腐败培训；

All employees shall receive dedicated anti-corruption training each year.

4) 高风险关键岗位人员（采购、销售、财务、高管等）签署《廉洁从业承诺书》；

Personnel in high-risk and key positions, including procurement, sales, finance and senior management, shall sign an Integrity Commitment.

5) 供应商和分包商在合同中承诺遵守公司反腐败要求。

Suppliers and subcontractors shall contractually commit to complying with the Company's anti-corruption requirements.

4.2.3 礼品与招待管理 Gifts and Hospitality Management

1) 公司制定《接待管理规定》，明确可接受的礼品和招待标准；

The Company shall establish a Gifts and Hospitality Management Procedure specifying acceptable standards for gifts and hospitality.

2) 超过规定标准的礼品和招待须事先审批；

Gifts and hospitality exceeding the specified limits require prior approval.

3) 禁止向政府官员提供现金或现金等价物；

Cash or cash equivalents shall not be offered to government officials.

4) 所有礼品和招待须登记备案。

All gifts and hospitality shall be registered and recorded.

4.2.4 举报与调查 Reporting and Investigation

1) 公司建立多渠道举报机制，包括：

The Company shall maintain multiple reporting channels, including:

- 举报热线：15692038078

  Reporting Hotline: 15692038078

- 举报邮箱：shenjibu@gokin.com

  Reporting Email: shenjibu@gokin.com

- 在线举报平台

  Online Reporting Platform

- 意见箱

  Suggestion Box

1) 举报可由实名或匿名方式提出；

   Reports may be submitted openly or anonymously.

2) 公司承诺保护举报人，严禁打击报复；

   The Company shall protect reporting persons and strictly prohibit retaliation.

3) 收到举报后，合规部应在 5 个工作日内启动初步评估；

   The Compliance Department shall initiate a preliminary assessment within five working days of receiving a report.

4) 调查结果和处理决定应记录保存，保存期限不少于 10 年。

   Investigation findings and disposition decisions shall be documented and retained for at least ten years.

4.3ESG 管理体系　ESG Management System

4.3.1 体系建立　System Establishment

1) 公司建立整合的 ESG 管理体系，涵盖环境、社会和治理各方面；

   The Company shall establish an integrated ESG management system covering environmental, social and governance matters.

2) 体系文件至少包括：

   Management-system documents shall include, at a minimum:

- 社会责任管理手册

  Social Responsibility Management Manual, issued by the ESG Department

- 本管理手册

This Management Manual

- 程序文件

  Procedures

- 作业指导书

  Work Instructions

- 记录表单

  Record Forms

- 体系文件应明确各部门和岗位的职责、权限和工作流程。

  Management-system documents shall define the responsibilities, authorities and workflows of departments and positions.

4.3.2 政策发布与传达　Policy Publication and Communication

1) ESG 政策经总经理批准后公开发布，可在公司官网、内部公告栏等渠道获取；

   After approval by the General Manager, the ESG Policy shall be published and made available through channels such as the Company's website and internal notice boards.

2) 政策应以中文及必要的其他语言版本发布；

   The Policy shall be issued in Chinese and in other languages where necessary.

3) 新员工入职时须接受 ESG 政策培训；

   New employees shall receive ESG Policy training during onboarding.

4) 政策修订后应及时传达至全体员工和利益相关方。

   Revisions to the Policy shall be communicated promptly to all employees and stakeholders.

4.3.3 资源保障　Resource Assurance

1) 公司每年编制 ESG 及可追溯性管理预算，纳入年度财务预算；

   The Company shall prepare an annual ESG and traceability management budget and include it in the annual financial budget.

2) 配备足够数量和资质的人员负责 ESG 及可追溯性管理工作；

   The Company shall assign sufficient qualified personnel to ESG and traceability management.

3) 提供必要的工作场所、设备和信息系统支持；

The Company shall provide the necessary workplaces, equipment and information-system support.

4) 为培训和外部咨询提供资金保障。

The Company shall provide financial resources for training and external consultancy.

4.4 风险与影响评估 Risk and Impact Assessment

4.4.1 评估范围 Assessment Scope

1) 公司每年至少开展一次全面的 ESG 风险与影响评估，评估范围包括：公司自身运营活动对环境、社会和人权的实际和潜在影响；

The Company shall conduct a comprehensive ESG risk and impact assessment at least annually. The assessment shall cover actual and potential environmental, social and human-rights impacts arising from the Company's own operations.

2) 供应商运营相关的风险和影响；

Risks and impacts associated with supplier operations.

3) 公司业务关系产生的责任。

Responsibilities arising from the Company's business relationships.

4.4.2 评估方法 Assessment Method

采用定性与定量相结合的方法；

The assessment shall combine qualitative and quantitative methods.

1) 按照可能性和严重程度对风险进行分级：

Risks shall be classified according to likelihood and severity:

2) 极高风险：立即采取行动

Critical risk: take immediate action.

3) 高风险：制定详细行动计划，3 个月内完成整改

High risk: develop a detailed action plan and complete remediation within three months.

4) 中等风险：纳入改进计划，6 个月内完成整改

Medium risk: include in the improvement plan and complete remediation within six months.

5) 低风险：持续监测

Low risk: monitor continuously.

4.4.3 行动计划　Action Plans

1) 针对识别出的风险，制定具体的行动计划；

Develop specific action plans for identified risks.

2) 行动计划应明确责任人、完成时限、所需资源和预期成果；

Action plans shall specify responsible persons, completion deadlines, required resources and expected outcomes.

3) 定期跟踪行动计划执行情况；

Track implementation of action plans regularly.

4) 风险缓解遵循以下层级：避免→减少→恢复→补偿。

Apply the following mitigation hierarchy: avoid, minimize, restore and compensate.

4.5 利益相关方参与　Stakeholder Engagement

4.5.1 利益相关方识别　Stakeholder Identification

公司识别的主要利益相关方包括：

The Company's key stakeholders include:

类别 Category	利益相关方 Stakeholder	主要关切 Key Concerns
内部 Internal	员工 Employees	薪酬福利、职业发展、工作环境、宗教信仰、语言、无障碍设施、 Compensation and benefits, career development, working environment, religion, language and accessibility
	股东/投资者 Shareholders/Investors	财务回报、风险管理 Financial returns and risk management
社区 Community	当地居民 Local residents	环境影响、就业机会、社区发展 Environmental impacts, employment opportunities and community development
	土著和部落居民 Indigenous and tribal peoples	土地权利、文化保护、FPIC Land rights, cultural protection and FPIC

类别 Category	利益相关方 Stakeholder	主要关切 Key Concerns
供应链 Supply Chain	供应商 Suppliers	公平交易、长期合作 Fair dealing and long-term cooperation
	客户 Customers	产品质量、ESG 合规 Product quality and ESG compliance
政府 Government	发改委/经信局 Development and Reform Commission/Economic and Information Bureau	法规合规、数据报告 Regulatory compliance and data reporting
	税务局 Taxation Bureau	合规纳税 Tax compliance
	人力资源和社会保障局 Human Resources and Social Security Bureau	合规社保，工时，工资，劳动争议 Social-insurance compliance, working hours, wages and labor disputes
	应急管理局 Emergency Management Bureau	安全生产、应急预案备案 Workplace safety and filing of emergency response plans
	市场监督管理局 Administration for Market Regulation	产品质量 Product quality
社会 Society	NGO、媒体 NGOs and media	人权、环境、透明度 Human rights, environment and transparency

4.5.2 参与计划 Engagement Plan

1) 公司相关部门制定《利益相关方参与计划》，根据运营风险、影响和发展阶段调整参与方式和频率；

   The Company departments shall establish a Stakeholder Engagement Plan and adjust engagement methods and frequency based on operational risks, impacts and development stage.

   参与过程应便于利用、具有包容性、公平、文化适宜、对性别问题敏感；

   Engagement processes shall be accessible, inclusive, equitable, culturally appropriate and gender-sensitive.

2) 特别关注弱势群体（如女性、少数民族、残障人士）的参与需求；

Particular attention shall be given to the engagement needs of vulnerable groups, including women, ethnic minorities and persons with disabilities.

3) 消除参与障碍，为受影响利益相关方提供必要的支持。

Barriers to engagement shall be removed, and necessary support shall be provided to affected stakeholders.

4.5.3 社区发展 Community Development

1) 公司评估项目对当地社区的潜在和实际不利影响；

The Company shall assess the potential and actual adverse impacts of projects on local communities.

2) 制定行动计划，最大限度减少、缓解和/或补偿不利影响；

Action plans shall be developed to minimize, mitigate and/or compensate for adverse impacts.

3) 积极创造本地就业机会，优先招聘当地居民；

The Company shall actively create local employment opportunities and prioritize the recruitment of local residents.

4) 支持本地采购，投资当地供应链；

The Company shall support local procurement and invest in local supply chains.

5) 与当地教育机构合作，促进教育机会。

The Company shall cooperate with local educational institutions to expand educational opportunities.

4.6 申诉机制 Grievance Mechanism

4.6.1 机制建立 Establishment of the Mechanism

1) 公司建立符合 UNGPs 要求的有效申诉机制并保留相应记录。

The Company shall establish an effective grievance mechanism consistent with the UN Guiding Principles on Business and Human Rights (UNGPs) and retain relevant records.

2) 申诉机制适用于所有利益相关方，包括员工、供应商、社区成员等；

The grievance mechanism applies to all stakeholders, including employees, suppliers and community members.

申诉渠道包括：

Grievance channels include:

电话热线：15692038078（24 小时）

Telephone Hotline: 15692038078 (24 hours)

电子邮箱：shenjibu@gokinsolar.com

Email: shenjibu@gokinsolar.com

在线平台：https://www.gokinsolar.com/honest

Online Platform: https://www.gokinsolar.com/honest

书面信函

Written correspondence

当面沟通

In-person communication

4.6.2 处理流程 Handling Process

1) 申诉接收 Receive grievance→登记分类 Register and classify→初步评估 Conduct preliminary assessment→调查核实 Investigate and verify→制定措施 Develop measures→反馈结果 Communicate outcome→关闭归档 Close and archive→持续改进 Continuous improvement→监测评估 Monitoring and evaluation→申诉接收 Receive grievance

1) 收到申诉后 2 个工作日内确认接收；

Receipt of a grievance shall be acknowledged within two working days.

2) 一般申诉应在 30 个工作日内完成调查和处理；

Standard grievances shall be investigated and resolved within 30 working days.

3) 复杂申诉可延长至 60 个工作日，须向申诉人说明原因；

Complex grievances may be extended to 60 working days, provided the reason is explained to the complainant.

4) 处理结果应以书面形式反馈申诉人；

The outcome shall be communicated to the complainant in writing.

5) 申诉人对处理结果不满意，可在 15 个工作日内申请复核。

A complainant dissatisfied with the outcome may request a review within 15 working days.

4.6.3 保护机制　Protection Measures

1) 严格保密申诉人身份和申诉内容；

The identity of the complainant and the content of the grievance shall be kept strictly confidential.

2) 严禁对申诉人进行任何形式的打击报复；

Retaliation against a complainant in any form is strictly prohibited.

3) 报复行为一经发现，将严肃处理责任人。

Any person responsible for retaliation shall be subject to serious disciplinary action.

4.7 透明度与报告　Transparency and Reporting

4.7.1 报告要求　Reporting Requirements

1) 公司每年编制并公开发布 ESG 报告；

The Company shall prepare and publicly release an ESG report each year.

2) 报告参考 GRI、SASB 等国际标准；

The report shall reference international standards such as GRI and SASB.

3) 报告内容涵盖所有重大 ESG 议题；

The report shall cover all material ESG topics.

4) 报告经第三方审验后发布。

The report shall be published following third-party assurance.

4.7.2 报告发布　Report Publication

1) ESG 报告通过公司官网、年报等渠道公开发布；

The ESG report shall be publicly released through the Company's website, annual report and other channels.

2) 报告发布时间不晚于次年 6 月 30 日；

The report shall be published no later than 30 June of the following year.

3) 报告以中文和英文发布。

The report shall be published in Chinese and English.

4.8 负责任采购 Responsible Sourcing

4.8.1 采购政策 Sourcing Policy

1) 公司制定《招采管理规定》,《受冲突影响和高风险区域识别控制程序》与 SSI ESG 标准确定的社会、环境和治理要求一致;

   The Company shall establish a Responsible Sourcing Policy aligned with the social, environmental and governance requirements of the SSI ESG Standard.政策向所有供应商传达,并纳入采购合同或协议或行为准则中;

   The Policy shall be communicated to all suppliers and incorporated into procurement contracts, agreements or codes of conduct.

2) 采购部负责政策的实施和监督。

   The Procurement Department is responsible for implementing and overseeing the Policy.

4.8.2KYC 调查 KYC Checks

1) 采购部制定 KYC 调查程序,并对所有供应商进行 KYC(了解你的交易方)调查;KYC 调查内容包括:

   The Procurement Department shall establish a Know Your Counterparty (KYC) procedure and conduct KYC checks on all suppliers. Checks shall cover:

- 供应商基本信息(名称、注册地、所有权结构、母子公司)

  Basic supplier information, including name, place of registration, ownership structure, parent company and subsidiaries
- 业务资质和许可

  Business qualifications and permits
- ESG 合规状况

  ESG compliance status
- 高风险地区关联性

  Connections to high-risk areas
- 负面新闻和争议事件

  Adverse media and controversies

- 供应商行为，如洗钱，变相支持军队

  Supplier conduct, including money laundering and indirect support for armed forces

- 是否纳入制裁名单

  Sanctions-list status

1) KYC 调查结果记录在《供应商档案》中；

   KYC findings shall be documented in the Supplier File.

2) 高风险供应商须进行尽职调查。

   Enhanced due diligence shall be conducted on high-risk suppliers.

4.8.3 供应商 ESG 评估　Supplier ESG Assessment

1) 新供应商准入须通过 ESG 评估；

   New suppliers shall pass an ESG assessment before onboarding.

2) 现有供应商每年至少进行一次 ESG 绩效评估；

   Existing suppliers shall undergo an ESG performance assessment at least annually.

3) 评估结果分为：优秀、良好、合格、不合格；

   Assessment results shall be classified as excellent, good, satisfactory or unsatisfactory.

4) 不合格供应商须制定整改计划，整改期间暂停新订单；

   An unsatisfactory supplier shall develop a corrective-action plan. New orders shall be suspended during remediation.

5) 连续两次评估不合格的供应商，终止合作关系。

   Cooperation shall be terminated with any supplier rated unsatisfactory in two consecutive assessments.

4.8.4 高风险地区采购　Sourcing from High-Risk Areas

1) 公司制定《负责任矿产管理制度》，至少符合 OECD《受冲突影响和高风险地区矿物负责任供应链尽职调查指南》附录二要求；

   The Company shall establish a Responsible Minerals Sourcing Policy that meets, at a minimum, the requirements of Annex II to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

2) 尽职调查体系包括：

The due diligence framework shall include:

- 强有力的管理体系（供应链政策、责任、资源、信息收集和供应商参与）；

  A strong management system covering supply chain policy, accountability, resources, information collection and supplier engagement.

- 识别和评估供应链中的风险；

  Identification and assessment of supply chain risks.

- 设计和实施应对已识别风险的策略；

  Design and implementation of strategies to respond to identified risks.

- 独立第三方审计；

  Independent third-party audits.

1) 每年公开报告尽职调查；

Public annual reporting on due diligence.

2) 禁止从已知使用强迫劳动的供应商采购；

Sourcing from suppliers known to use forced labor is prohibited.

3) 冲突矿物（锡、钽、钨、金等）须进行溯源调查。

Conflict minerals, including tin, tantalum, tungsten and gold, shall be subject to traceability investigation.

5.环境管理 Environmental Management

5.1 温室气体排放管理 Greenhouse Gas Emissions Management

5.1.1 排放核算 Emissions Accounting

1) 环境安全部按照 WRI/WBCSD 温室气体议定书，每年开展温室气体盘查；

The Environment and Safety Department shall conduct an annual greenhouse gas inventory in accordance with the WRI/WBCSD Greenhouse Gas Protocol.

2) 盘查范围：

The inventory boundary shall include:

范围 1：固定源燃烧、移动源燃烧、工艺排放、无组织排放

Scope 1: stationary combustion, mobile combustion, process emissions and fugitive emissions

范围 2：外购电力、外购蒸汽

Scope 2: purchased electricity and purchased steam

范围 3：识别相关排放源（如采购的原材料、员工通勤、商务旅行、产品运输等）

Scope 3: relevant emissions sources, such as purchased raw materials, employee commuting, business travel and product transportation

1) 盘查数据经第三方核查后发布；

Inventory data shall be published after third-party verification.

2) 盘查结果纳入年度 ESG 报告。

Inventory results shall be included in the annual ESG report.

5.1.2 减排目标　Emissions-Reduction Targets

1) 公司设定以下温室气体减排目标：

The Company has established the following greenhouse gas emissions-reduction targets:

- 短期目标（2030 年）：范围 1 和 2 排放较 2025 年基准年减少 20%

  Short-term target (2030): reduce Scope 1 and Scope 2 emissions by 20% from the 2025 baseline

- 中期目标（2040 年）：范围 1 和 2 实现碳中和

  Medium-term target (2040): achieve carbon neutrality for Scope 1 and Scope 2 emissions

- 长期目标（2050 年）：全价值链实现净零排放

  Long-term target (2050): achieve net-zero emissions across the full value chain

1) 每半年评估目标进展，必要时调整行动计划。

Progress shall be assessed every six months, and action plans shall be adjusted where necessary.

5.1.3 减排措施　Emissions-Reduction Measures

根据公司经营生产情况，包括但不限于从以下方面进行减排：

Based on the Company's operating and production conditions, emissions-reduction measures shall include, but are not limited to:

1) 能源效率提升：实施节能技改项目，优化生产工艺；

Energy efficiency: implement energy-saving technology upgrades and optimize production processes.

2) 可再生能源：提高可再生能源使用比例，如建议光伏、太阳能等；

Renewable energy: increase the share of renewable energy, including photovoltaic and other solar energy where appropriate.

3) 工艺改进：减少工艺过程中的直接排放；

Process improvements: reduce direct emissions from production processes.

4) 绿色采购：优先采购低碳原材料；

Green procurement: prioritize low-carbon raw materials.

5) 碳抵消：在无法避免的排放领域，采购绿电、碳信用抵消。

Carbon offsetting: for residual unavoidable emissions, procure green electricity and use eligible carbon credits.

5.2 水资源管理 Water Management

5.2.1 水风险评估 Water-Risk Assessment

1) 环境安全部每年开展水资源风险评估；

The Environment and Safety Department shall conduct a water-risk assessment annually.

2) 评估内容：

The assessment shall cover:

- 运营地水资源压力等级（参考 WRI 水风险地图）

  Water-stress levels at operating locations, with reference to the WRI water-risk map

- 业务活动对水平衡、流量、水质的影响

  Impacts of business activities on water balance, flow and quality

- 对其他用水者和野生动物的影响

  Impacts on other water users and wildlife

1) 评估结果记录在《水资源风险评估报告》中。

Assessment findings shall be documented in a Water-Risk Assessment Report.

5.2.2 水资源管理目标　Water-Management Targets

1) 公司设定以下水资源管理目标：

The Company has established the following water-management targets:

- 短期目标（2028 年）：与基准年相比，到 2028 年单位产品用水量年降低 3%。

  Short-term target (2028): reduce annual water consumption per unit of product by 3% by 2028 compared with the baseline year.

- 中期目标（2035 年）：与基准年相比，到 2035 年单位产品用水量年降低 8%

  Medium-term target (2035): reduce annual water consumption per unit of product by 8% by 2035 compared with the baseline year.

1) 目标纳入各部门绩效考核。

The targets shall be incorporated into departmental performance assessments.

5.2.3 水管理措施　Water-Management Measures

1) 建立用水监测系统，关键用水点安装计量仪表；

Establish a water-use monitoring system and install meters at key water-use points.

2) 实施中水回用、雨水收集等节水措施；

Implement water-saving measures, including reclaimed-water reuse and rainwater harvesting.

3) 优化生产工艺，减少用水量；

Optimize production processes to reduce water consumption.

4) 定期监测废水水质，确保达标排放；

Monitor wastewater quality regularly to ensure compliant discharge.

5) 与社区共享水资源管理信息。

Share water-management information with local communities.

5.3 废弃物管理　Waste Management

5.3.1 固体废弃物识别　Identification of Solid Waste

1) EHSS 部制定《固体废物环保管理制度》,《环境因素识别与评价控制程序》等，每年识别和量化公司产生的各类废弃物；

The Environment and Safety Department shall establish procedures such as the Solid Waste

Management Rules and the Environmental Aspect Identification and Assessment Control Procedure, and identify and quantify all waste generated by the Company annually.

2) 环境安全部每年开展固体废弃物风险评估；主要从对土壤、空气、水污染、人类健康、合规性风险等方面进行，并形成风险评估记录表。

The Environment and Safety Department shall conduct an annual solid-waste risk assessment covering impacts on soil, air and water, human health, and compliance risks, and shall maintain a risk-assessment record.

3) 废弃物分类：

Waste shall be classified as follows:

- 危险废弃物：废酸、废碱、含重金属污泥、废有机溶剂等

  Hazardous waste: waste acid and alkali, sludge containing heavy metals, waste organic solvents and similar materials

- 一般工业废弃物：废包装材料、废木材、废金属等

  General industrial waste: discarded packaging, wood, metals and similar materials

- 可回收废弃物：废纸、废塑料、废玻璃等

  Recyclable waste: waste paper, plastics, glass and similar materials

- 生活垃圾

  Domestic waste

1) 建立《废弃物清单》，记录各类废弃物的产生量、处置方式和去向。

A Waste Register shall record the quantity, disposal method and destination of each waste category.

5.3.2 废弃物管理目标 Waste-Management Targets

1) 公司设定以下固体废弃物管理目标：

The Company has established the following solid-waste management targets:

- 短期目标（2028 年）：与基准年相比，到 2028 年单位产品废弃物年降低 3%。

  Short-term target (2028): reduce annual waste generation per unit of product by 3% by 2028 compared with the baseline year.

- 中期目标（2035 年）：与基准年相比，到 2028 年单位产品废弃物年降低 8%

  Medium-term target (2035): reduce annual waste generation per unit of product by 8% by 2028 compared with the baseline year.

5.3.3 废弃物管理措施　Waste-Management Measures

1) 源头减量：推行清洁生产，减少废弃物产生；

   Source reduction: promote cleaner production and reduce waste generation.

2) 分类收集：按类别设置收集容器，标识清晰；

   Segregated collection: provide clearly labeled collection containers by waste category.

3) 储存管理：危险废弃物储存场所符合防渗漏、防扬散、防流失要求；

   Storage management: hazardous-waste storage areas shall prevent leakage, dispersion and loss.

4) 转移联单：危险废弃物转移执行联单制度；

   Transfer manifests: hazardous-waste transfers shall use the statutory manifest system.

5) 供应商管理：选择有资质的废弃物处置供应商，定期审核。

   Vendor management: select qualified waste-disposal vendors and audit them regularly.

5.4 污染管理　Pollution Management

5.4.1 国际公约合规　Compliance with International Conventions

1) 公司确保运营符合以下国际环境公约：

   The Company shall ensure that its operations comply with the following international environmental conventions:

- 《关于汞的水俣公约》

  Minamata Convention on Mercury

- 《斯德哥尔摩持久性有机污染物公约》

  Stockholm Convention on Persistent Organic Pollutants

- 《控制危险废物越境转移及处置的巴塞尔公约》

  Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal

- 《鹿特丹公约》

Rotterdam Convention

1) 禁止使用国际明令禁止的化学品和危险物质；

Chemicals and hazardous substances prohibited internationally shall not be used.

2) 定期审查化学品清单，确保合规。

The chemical inventory shall be reviewed regularly to ensure compliance.

5.4.2 污染防治　Pollution Prevention and Control

1) 识别所有污染物排放源；

Identify all sources of pollutant emissions and discharges.

2) 建立污染物排放监测系统；

Establish a pollutant emissions and discharge monitoring system.

3) 确保大气、水体、噪声、土壤等污染物排放符合国家和地方标准；

Ensure that emissions and discharges affecting air, water, noise and soil comply with national and local standards.

4) 制定污染事故应急预案，每年至少演练一次；

Develop an emergency response plan for pollution incidents and conduct at least one drill annually.

5) 定期评估污染控制措施有效性，持续改进。

Assess the effectiveness of pollution controls regularly and pursue continuous improvement.

5.5 生物多样性管理　Biodiversity Management

5.5.1 承诺与目标　Commitments and Targets

公司承诺：

The Company commits to:

- 无生物多样性净损失

  No net loss of biodiversity

- 零砍伐森林

  Zero deforestation

- 不在世界自然遗产或其缓冲地带经营

Not operating within World Heritage properties or their buffer zones

- 尊重保护区和其他因其生物多样性重要性而指定的地区的管理目标

  Respecting the management objectives of protected areas and other areas designated for their biodiversity importance
- 制定有时间限制的生物多样性保护目标。

  Establishing time-bound biodiversity conservation targets

5.5.2 影响评估与管理 Impact Assessment and Management

1) 新项目建设前开展生物多样性基线调查；

   Conduct a biodiversity baseline survey before constructing a new project.
2) 识别和量化业务活动对生物多样性的实际和潜在影响；

   Identify and quantify actual and potential impacts of business activities on biodiversity.
3) 按照缓解层级制定行动计划：避免→减少→恢复→补偿；

   Develop action plans in accordance with the mitigation hierarchy: avoid, minimize, restore and compensate.
4) 建立生物多样性监测程序，定期监测保护成效。

   Establish a biodiversity monitoring procedure and monitor conservation outcomes regularly.

5.6 循环利用与材料效率 Circularity Management

5.6.1 循环利用与材料效率方针 Circular-Economy Assessment

1) 识别和量化材料使用和产品循环性的实际和潜在影响及机会；

   Identify and quantify actual and potential impacts and opportunities relating to material use and product circularity.
2) 收集原料使用和产品循环利用数据；

   Collect data on raw-material use and product circularity.
3) 通过摇篮到大门分析、回收材料比例方法等评估循环性。

   Assess circularity through cradle-to-gate analysis, recycled-content ratios and other appropriate methods.

5.6.2 循环利用与材料效率目标 Circularity Targets and Measures

1) 提高回收材料使用比例；

Increase the proportion of recycled materials used.

2) 设计易于回收和再利用的产品；

Design products for easier recycling and reuse.

3) 建立产品回收体系；

Establish a product take-back system.

4) 减少一次性材料使用；

Reduce the use of single-use materials.

5) 建立循环性监测程序，定期评估进展。

Establish a circularity monitoring procedure and assess progress regularly.

6.人权与劳工权益管理 Human Rights and Labor Rights Management

6.1 人权政策与尽职调查 Human Rights Policy and Due Diligence

6.1.1 人权政策 Human Rights Policy

1) 公司制定人权相关政策，承诺尊重和保护人权；

The Company shall establish human-rights policies and commit to respecting and protecting human rights.

2) 政策经总经理批准，向全体员工、供应商和利益相关方传达；

The policies shall be approved by the General Manager and communicated to all employees, suppliers and stakeholders.

3) 政策至少包括：

The policies shall include, at a minimum:

- 尊重国际人权法和 UNGPs 的承诺

  A commitment to respect international human-rights law and the UNGPs

- 禁止强迫劳动和人口贩卖

  Prohibition of forced labor and human trafficking

- 禁止童工

Prohibition of child labor

- 尊重结社自由和集体谈判权

  Respect for freedom of association and the right to collective bargaining

- 禁止歧视和骚扰

  Prohibition of discrimination and harassment

- 提供安全健康的工作环境

  Provision of a safe and healthy working environment

1) 政策每年至少审查一次。

   The policies shall be reviewed at least annually.

6.1.2 人权尽职调查 Human Rights Due Diligence

1) 公司每年开展人权尽职调查，识别、预防、缓解和说明如何处理对人权的实际和潜在影响；

   The Company shall conduct human-rights due diligence annually to identify, prevent and mitigate actual and potential human-rights impacts and account for how they are addressed.

2) 尽职调查范围包括公司自身运营和供应链；

   Due diligence shall cover the Company's own operations and supply chain.

3) 识别出公司造成或促成的不利人权影响，应提供或合作进行补救；

   Where the Company has caused or contributed to an adverse human-rights impact, it shall provide for or cooperate in remediation.

4) 尽职调查结果记录在《人权尽职调查报告》中。

   Due diligence findings shall be documented in a Human Rights Due Diligence Report.

6.1.3 安保力量管理 Management of Security Forces

1) 公司雇佣或使用的安保力量须接受充分指导、培训和监督；

   Security forces engaged or used by the Company shall receive adequate instruction, training and supervision.

2) 确保安保行为符合国际人权标准；

   Security conduct shall comply with international human-rights standards.

3) 禁止使用酷刑、残忍、不人道或有辱人格的待遇；

Torture and cruel, inhuman or degrading treatment are prohibited.

4) 保障工人的自由结社权。

Workers' right to freedom of association shall be protected.

6.1.4 土著人民权利 Rights of Indigenous Peoples

在已知存在土著人民社区或群体的影响范围内：

Within areas of influence where Indigenous communities or groups are known to be present, the Company shall:

- 承诺获取土著社区对新项目的同意；

  Commit to obtaining the consent of Indigenous communities for new projects.

- 实施自由、事先和知情同意（FPIC）原则；

  Apply the principle of Free, Prior and Informed Consent (FPIC).

- 尊重土著人民的传统土地和文化遗产。

  Respect the traditional lands and cultural heritage of Indigenous Peoples.

6.1.5 土地权利 Land Rights

1) 识别和记录与土地和水资源使用相关的法律和/或习惯权利；

Identify and document legal and/or customary rights relating to the use of land and water resources.

2) 如存在土地或水资源争议风险，确保所有相关权利得到遵守；

Where a risk of dispute over land or water resources exists, ensure that all relevant rights are respected.

3) 与受影响社区协商解决争议。

Consult affected communities to resolve disputes.

6.2 劳工权益 Labor Rights

6.2.1 自由选择就业 Freely Chosen Employment

1) 公司严禁使用或支持任何形式的强迫劳动；

The Company strictly prohibits the use or support of forced labor in any form.

2) 禁止以下行为：

The following practices are prohibited:

- 监狱劳动

  Prison labor

- 契约劳动

  Indentured labor

- 抵债劳动

  Bonded labor

- 奴隶劳动

  Slave labor

- 人口贩卖和性剥削

  Human trafficking and sexual exploitation

1) 工人有权在给予合理通知后随时终止雇佣关系，不得收取行政或财务罚款；

Workers may terminate their employment at any time upon reasonable notice and shall not be subject to administrative or financial penalties.

2) 仅雇佣有合法工作权的工人；

Only workers with a legal right to work shall be employed.

3) 人力资源部每年至少开展一次强迫劳动风险评估。

The Human Resources Department shall conduct a forced-labor risk assessment at least annually.

6.2.2 童工保护 Protection Against Child Labor

1) 公司不雇佣或允许低于以下年龄的儿童工作：

The Company shall not employ or permit children below the highest of the following ages to work:

- 15 岁，或

  15 years of age;

- 完成义务教育的年龄，或

  The age of completion of compulsory schooling; or

- 国家法定最低就业年龄（取最高值）

  The national legal minimum age for employment.

1) 严禁最恶劣形式的童工劳动；

   The worst forms of child labor are strictly prohibited.

2) 建立年龄验证程序，保存年龄证明文件；

   An age-verification procedure shall be established, and proof-of-age documents shall be retained.

3) 如发现童工，立即执行以下程序：

   If child labor is identified, the following steps shall be taken immediately:

- 立即停止该儿童工作；

  Stop the child from working immediately.

- 不得将其驱逐出工作场所，确保其安全；

  Do not expel the child from the workplace; ensure the child's safety.

- 通知当地劳动部门和儿童保护机构；

  Notify the local labor authority and child-protection agency.

- 制定补救程序，支持儿童过渡到合法工作或教育；

  Develop a remediation process to support the child's transition to lawful employment or education.

- 记录事件并报告 SSI 秘书处。

  Document the incident and report it to the SSI Secretariat.

6.2.3 结社自由与集体谈判 Freedom of Association and Collective Bargaining

1) 公司尊重工人自由加入工会、寻求代表和加入工人委员会的权利；

   The Company shall respect workers' rights to join trade unions freely, seek representation and join workers' councils.

2) 尊重工人集体谈判的权利，善意参与集体谈判；

   The Company shall respect workers' right to collective bargaining and participate in collective bargaining in good faith.

3) 遵守已签订的集体谈判协议；

The Company shall comply with executed collective bargaining agreements.

4) 支持法律允许的替代性工人结社方式；

The Company shall support alternative forms of worker association permitted by law.

5) 不阻碍独立和自由结社的平行方式的发展。

The Company shall not obstruct the development of parallel means for independent and free association.

6.2.4 非歧视 Non-Discrimination

1) 公司在招聘、薪酬、培训、晋升、解雇或退休方面不存在歧视；

The Company shall not discriminate in recruitment, compensation, training, promotion, termination or retirement.

2) 禁止基于以下因素的歧视：

Discrimination based on the following characteristics is prohibited:

- 种族、种姓、民族、宗教

  Race, caste, ethnicity or religion

- 年龄、残疾、性别、性取向

  Age, disability, sex or sexual orientation

- 婚姻状况、政治派别

  Marital status or political affiliation

- 工会成员身份、地区或来源

  Trade-union membership, region or origin

1) 人力资源部定期审查招聘和晋升程序的公平性；

The Human Resources Department shall review the fairness of recruitment and promotion procedures regularly.

2) 监测薪酬公平性，确保同工同酬。

Pay equity shall be monitored to ensure equal pay for equal work.

6.2.5 纪律实践与骚扰 Disciplinary Practices and Harassment

1) 公司制定《反骚扰政策》，防止和解决骚扰、恐吓和/或剥削；

The Company shall establish an Anti-Harassment Policy to prevent and address harassment, intimidation and/or exploitation.

2) 严禁以下行为：

The following conduct is strictly prohibited:

- 任何形式的体罚；

  Corporal punishment in any form

- 严厉或有辱人格的待遇；

  Harsh or degrading treatment

- 性骚扰或身体骚扰；

  Sexual or physical harassment

- 精神、身体或言语虐待；

  Mental, physical or verbal abuse

- 胁迫或恐吓；

  Coercion or intimidation

- 将罚款作为纪律处分手段；

  The use of fines as a disciplinary measure

1) 建立投诉处理程序，保护举报人；

A complaint-handling procedure shall be established to protect reporting persons.

2) 对违规行为零容忍，一经发现严肃处理。

The Company applies zero tolerance to violations and shall take serious disciplinary action when a violation is identified.

6.2.6 雇佣条款 Terms of Employment

1) 公司以工人能理解的语言提供书面雇佣条款，内容包括：

The Company shall provide written terms of employment in a language workers understand. The terms shall include:

- 工作岗位和职责

  Job position and responsibilities

- 工作时间、工资、加班费

  Working hours, wages and overtime pay
- 福利和休假

  Benefits and leave
- 合同期限和终止条件

  Contract term and termination conditions

1) 雇佣关系开始时提供，发生重大变更时更新，工人可随时索取；

   Terms shall be provided at the start of employment, updated following any material change and made available to workers at any time.
2) 不通过劳务外包、分包或家庭工作安排规避劳动义务；

   The Company shall not use labor outsourcing, subcontracting or homeworking arrangements to avoid labor obligations.
3) 不滥用固定期限合同代替正式雇佣。

   Fixed-term contracts shall not be misused as a substitute for regular employment.

6.2.7 道德招聘　Ethical Recruitment

1) 公司严禁向工人收取任何招聘费用或相关成本；

   The Company strictly prohibits charging workers any recruitment fee or related cost.
2) 仅使用在相关部门注册的劳务代理；

   Only labor agencies registered with the relevant authority may be used.
3) 与劳务代理签订具有法律约束力的服务水平协议；

   Legally binding service-level agreements shall be executed with labor agencies.
4) 对劳务代理进行尽职调查，确保其遵守国家法律、国际标准和公司行为准则；

   Due diligence shall be conducted on labor agencies to ensure compliance with national law, international standards and the Company's Code of Conduct.
5) 不得要求工人支付押金或特定材料/设备费用（如防护装备、制服等）；

   Workers shall not be required to pay deposits or costs for specified materials or equipment, including protective equipment and uniforms.

6) 禁止要求工人偿还内部培训费用；

Workers shall not be required to repay internal training costs.

7) 移民工人的雇佣协议在出发至抵达接收国期间不得被替换或更改，除非为满足当地法律且提供同等或更好的条件；

Employment agreements for migrant workers shall not be substituted or amended between departure and arrival in the receiving country, unless the change is required by local law and provides equivalent or better terms.

8) 确保招聘代理或中介向工人充分传达雇佣条款和住宿安排信息。

Recruitment agents or intermediaries shall communicate terms of employment and accommodation arrangements fully to workers.

6.2.8 工作时间　Working Hours

1) 正常工作时间符合国家法律；

Normal working hours shall comply with national law.

2) 无法律规定时，每周正常工作时间不超过 48 小时（ILO 第 1 号公约）；

Where no legal limit exists, normal working hours shall not exceed 48 hours per week, in accordance with ILO Convention No. 1.

3) 加班自愿，正常和加班时间总和不超过 60 小时/周，或国家法律允许的最大值（取较低值）；

Overtime shall be voluntary. Total normal and overtime hours shall not exceed 60 hours per week or the maximum permitted by national law, whichever is lower.

4) 每 7 个连续工作日至少提供一天休息（ILO 第 14 号公约）；

Workers shall receive at least one rest day in every seven consecutive working days, in accordance with ILO Convention No. 14.

5) 特殊情况例外须同时满足：

Any exception for special circumstances shall meet all of the following conditions:

- 国家法律允许；

  It is permitted by national law.

- 经自由协商的集体协议允许；

  It is permitted by a freely negotiated collective agreement.

- 采取适当措施保护工人健康安全；

  Appropriate measures are taken to protect workers' health and safety.

- 公司或用人部门能证明存在特殊情况。

  The Company or employing department can demonstrate that exceptional circumstances exist.

6.2.9 工资与福利　Wages and Benefits

1) 工人工资达到或超过以下标准中的最高值：

   Workers' wages shall meet or exceed the highest of the following:

- 法定最低工资

  The statutory minimum wage

- 集体工资协议工资

  The wage specified in a collective bargaining agreement

- 行业通行标准工资

  The prevailing industry-standard wage

1) 加班费按照国家法律、集体协议或行业标准支付；

   Overtime shall be paid in accordance with national law, collective agreements or industry standards.

2) 工资以法定货币及时支付，每月至少一次；

   Wages shall be paid on time in legal tender at least once per month.

3) 所有工人每次发薪均收到详细工资单；

   Every worker shall receive an itemized payslip for each payment.

4) 与利益相关方合作确定运营所在国的生活工资，制定计划逐步向所有工人支付生活工资；

   The Company shall work with stakeholders to determine a living wage in each country of operation and develop a plan to progressively pay a living wage to all workers.

5) 提供所有法定假期，包括：

   All statutory leave shall be provided, including:

- 产假和陪产假

  Maternity and paternity leave

- 丧假

  Bereavement leave

- 带薪年假（无法律规定时按 ILO 第 132 号公约执行）。

  Paid annual leave, applying ILO Convention No. 132 where no legal requirement exists

7.职业健康与安全管理　Occupational Health and Safety Management

7.1 一般职业健康安全　General Occupational Health and Safety

7.1.1 风险评估　Risk Assessment

1) 环境安全部每年至少组织一次全面的健康和安全风险评估；

   The Environment and Safety Department shall organize a comprehensive health and safety risk assessment at least annually.

2) 评估范围包括所有可能对身心健康产生负面影响的运营活动和流程；

   The assessment shall cover all activities and processes that may adversely affect physical or mental health.

3) 识别的危害包括但不限于：

   Hazards shall include, but are not limited to:

- 机械和设备的使用

  Use of machinery and equipment

- 危险化学品/材料的储存和处理

  Storage and handling of hazardous chemicals and materials

- 接触烟雾、空气颗粒物和挥发性有机化合物

  Exposure to fumes, airborne particulates and volatile organic compounds

- 过度噪音和/或温度水平

  Excessive noise and/or temperature levels

- 照明和通风不足

  Inadequate lighting and ventilation

- 重复性劳损活动

  Repetitive-strain activities

- 基础设施和建筑完整性

  Infrastructure and building integrity

- 一般卫生和清洁

  General sanitation and housekeeping

1) 评估结果记录在《职业健康安全风险评估报告》中。

   Assessment findings shall be documented in an Occupational Health and Safety Risk Assessment Report.

7.1.2 危害控制　Hazard Controls

1) 建立、实施和维护消除或最小化健康和安全危害的行动和流程；

   Actions and processes shall be established, implemented and maintained to eliminate or minimize health and safety hazards.

2) 控制措施按照以下层级优先采用：

   Controls shall be prioritized according to the following hierarchy:

- 第一层级：消除危害（最有效）

  Level 1: eliminate the hazard, the most effective control

- 第二层级：替代危害物质/流程

  Level 2: substitute the hazardous substance or process

- 第三层级：工程控制（隔离、通风、防护装置等）

  Level 3: engineering controls, including isolation, ventilation and guarding

- 第四层级：管理控制（安全操作规程、培训、标识等）

  Level 4: administrative controls, including safe operating procedures, training and signage

- 第五层级：个人防护装备（最后手段）

  Level 5: personal protective equipment, as a last resort

7.1.3 个人防护装备（PPE）　Personal Protective Equipment (PPE)

1) 免费向工人和访客提供功能正常的 PPE；

Functional PPE shall be provided free of charge to workers and visitors.

2) 根据岗位风险评估结果确定所需 PPE 类型；

Required PPE shall be determined based on position-specific risk assessments.

3) 建立 PPE 发放、使用、维护和更换制度；

Procedures shall govern the issuance, use, maintenance and replacement of PPE.

4) 培训工人正确使用 PPE；

Workers shall be trained in the correct use of PPE.

5) 定期检查 PPE 状况，损坏或失效的 PPE 及时更换。

PPE shall be inspected regularly, and damaged or ineffective PPE shall be replaced promptly.

7.1.4 健康安全培训 Health and Safety Training

1) 以工人能理解的形式和语言提供定期和有记录的健康安全培训；

Documented health and safety training shall be provided regularly in a form and language workers understand.

2) 新员工入职须接受三级安全教育（公司级、部门级、班组级）；

New employees shall complete three-tier safety training at Company, department and team levels.

3) 调岗员工须接受新岗位安全培训；

Employees transferred to a new position shall receive safety training for that position.

4) 培训内容至少包括：

Training shall cover, at a minimum:

- 特定岗位相关的健康和安全危害及控制措施

  Position-specific health and safety hazards and controls

- PPE 的正确使用和维护

  Correct use and maintenance of PPE

- 危险化学品/材料安全处理

  Safe handling of hazardous chemicals and materials

- 事故报告程序

  Incident-reporting procedures

- 消防安全和紧急疏散程序

  Fire safety and emergency-evacuation procedures

- 急救知识和技能（指定人员）

  First-aid knowledge and skills for designated personnel

1) 工人在危险情况下停止工作或拒绝工作的权利和责任

   Workers' rights and responsibilities to stop or refuse work in hazardous conditions

2) 特种作业人员须持证上岗，证书在有效期内；

   Personnel performing special operations shall hold valid qualifications.

3) 保存所有培训记录，保存期限不少于 10 年。

   All training records shall be retained for at least ten years.

7.1.5 事故调查与管理　Incident Investigation and Management

1) 建立事故报告和调查程序；

   Establish incident-reporting and investigation procedures.

2) 所有事故、事件和职业病须立即报告；

   All accidents, incidents and occupational diseases shall be reported immediately.

3) 成立事故调查小组，调查事故原因；

   Establish an investigation team to determine the causes of an incident.

4) 采用根本原因分析方法（如 5Why、鱼骨图等）；

   Use root-cause analysis methods, such as the Five Whys and fishbone diagrams.

5) 制定并实施纠正和预防措施；

   Develop and implement corrective and preventive actions.

6) 将调查结果纳入相关控制措施的审查；

   Use investigation findings to review relevant controls.

7) 定期分析事故数据，识别系统性问题。

   Analyze incident data regularly to identify systemic issues.

7.2 化学品管理 Chemical Management

7.2.1 化学品管控 Chemical Controls

1) 按照相关法律法规控制、储存、运输、使用和处置危险化学品/材料；

   Hazardous chemicals and materials shall be controlled, stored, transported, used and disposed of in accordance with applicable laws and regulations.

2) 建立《危险化学品清单》，包括化学品名称、CAS 号、数量、储存位置、用途等信息；

   A Hazardous Chemical Register shall record the chemical name, CAS number, quantity, storage location, intended use and other relevant information.

3) 确保工人了解相关风险，在使用危险化学品的场所提供安全技术说明书（SDS）；

   Workers shall be informed of relevant risks, and Safety Data Sheets (SDSs) shall be available where hazardous chemicals are used.

4) SDS 以工人能理解的语言提供；

   SDSs shall be provided in a language workers understand.

5) 禁止生产、交易或使用国际明令禁止的化学品和危险物质；

   The production, trade or use of chemicals and hazardous substances prohibited internationally is forbidden.

6) 减少危险化学品/材料的使用量；

   The use of hazardous chemicals and materials shall be reduced.

7) 在技术可行且经济合理的情况下，使用替代品。

   Substitutes shall be used where technically feasible and economically reasonable.

7.2.2 储存与使用 Storage and Use

1) 危险化学品储存场所符合防火、防爆、防泄漏、防腐蚀要求；

   Hazardous-chemical storage areas shall meet fire-prevention, explosion-prevention, leak-prevention and corrosion-prevention requirements.

2) 储存区域设置明显标识和警示标志；

   Storage areas shall display clear labels and warning signs.

3) 配备必要的应急设备和物资；

Necessary emergency equipment and supplies shall be provided.

4) 建立化学品领用登记制度；

A chemical issuance and use register shall be maintained.

5) 定期检查和维护储存设施。

Storage facilities shall be inspected and maintained regularly.

7.3 安全与卫生　Safety and Hygiene

7.3.1 工作环境　Working Environment

1) 提供安全卫生的工作环境，符合行业标准和风险评估中识别的特定危害要求；

A safe and hygienic working environment shall be provided in accordance with industry standards and requirements for specific hazards identified in risk assessments.

2) 采取适当措施预防事故和伤害；

Appropriate measures shall be taken to prevent accidents and injuries.

3) 工作场所保持整洁有序，通道畅通；

Workplaces shall be kept clean and orderly, with passageways unobstructed.

4) 设备设施定期维护保养。

Equipment and facilities shall be serviced and maintained regularly.

7.3.2 设施要求　Facility Requirements

1) 提供清洁卫生的厕所设施，数量与员工人数和性别相匹配；

Clean and hygienic toilet facilities shall be provided in numbers appropriate to the workforce size and gender composition.

2) 提供充足的饮用水；

Adequate drinking water shall be provided.

3) 提供适当的食品储存卫生设施；

Appropriate hygienic food-storage facilities shall be provided.

- 如提供住宿，住宿应清洁、安全，满足工人基本需求，至少包括：

  Where accommodation is provided, it shall be clean and safe and meet workers' basic needs, including at a minimum:

- 饮用水

  Drinking water
- 食品储存卫生设施

  Hygienic food-storage facilities
- 清洁卫生的洗涤和厕所设施

  Clean and hygienic washing and toilet facilities
- 维护良好且清晰标识的消防安全设备和警报

  Well-maintained and clearly marked fire-safety equipment and alarms
- 清晰标识、未锁且未堵塞的紧急出口和逃生路线

  Clearly marked, unlocked and unobstructed emergency exits and escape routes
- 充足的电力供应和应急照明

  Adequate electricity supply and emergency lighting
- 适当的居住面积和通风条件

  Adequate living space and ventilation

7.4 消防安全、应急准备与响应　Fire Safety, Emergency Preparedness and Response

7.4.1 应急管理　Emergency Management

1) 识别和评估工作场所和公司提供的住宿中的紧急情况；

   Identify and assess emergencies that may arise in workplaces and Company-provided accommodation.
2) 制定和实施适当的应急计划和响应程序；

   Develop and implement appropriate emergency plans and response procedures.
3) 与潜在受影响利益相关方群体（社区、工人及其代表、相关应急服务机构）合作制定应急程序；

   Develop emergency procedures in cooperation with potentially affected stakeholder groups, including communities, workers and their representatives, and relevant emergency services.
4) 每年至少组织一次综合应急演练。

   Conduct at least one comprehensive emergency drill annually.

7.4.2 消防与急救　Fire Safety and First Aid

1) 提供维护良好且清晰标识的消防安全设备和警报；

   Provide well-maintained and clearly marked fire-safety equipment and alarms.

2) 清晰标识、未锁且未堵塞的紧急出口和逃生路线；

   Provide clearly marked, unlocked and unobstructed emergency exits and escape routes.

3) 提供急救用品和受过培训的急救人员；

   Provide first-aid supplies and trained first-aid personnel.

4) 建立送往当地医疗机构的程序；

   Establish a procedure for transfer to local medical facilities.

5) 与附近医疗机构建立合作关系，确保紧急情况下及时救治。

   Establish cooperation with nearby medical institutions to ensure prompt treatment in emergencies.

8.供应链可追溯性管理　Supply Chain Traceability Management

8.1 管理体系　Management System

8.1.1 成员资格　Membership

1) 本公司作为 SSI 制造商会员，在申请供应链可追溯性认证前，已获得或正在同步申请 SSI ESG 标准认证；

   As an SSI manufacturer member, the Company shall have obtained, or be applying concurrently for, SSI ESG Standard certification before applying for Supply Chain Traceability certification.

2) 持续保持 SSI 会员资格，按时缴纳会费；

   The Company shall maintain SSI membership continuously and pay membership fees on time.

3) 遵守 SSI 章程和会员条款。

   The Company shall comply with the SSI Articles of Association and Membership Terms.

8.1.2 管理代表　Management Representative

1) 公司指定溯源组、PMC 负责人为可追溯性管理代表；

   The Company shall appoint the head of the Supply Chain Management Center, PMC as the Traceability Management Representative.

2) 管理代表全面负责公司符合 SSI 供应链可追溯性标准的所有适用要求；

   The Management Representative has overall responsibility for ensuring the Company's compliance with all applicable requirements of the SSI Supply Chain Traceability Standard.

3) 管理代表职责：

   The Management Representative shall:

- 建立和维护可追溯性管理体系

  Establish and maintain the traceability management system.

- 协调各部门可追溯性工作

  Coordinate traceability activities across departments.

- 组织可追溯性培训

  Organize traceability training.

- 配合认证评估

  Support certification assessments.

- 向高级管理层报告可追溯性绩效。

  Report traceability performance to senior management.

8.1.3 培训　Training

1) 建立和实施可追溯性培训计划；

   A traceability training plan shall be established and implemented.

2) 使相关岗位人员了解并胜任其在 SSI 供应链可追溯性标准下的职责；

   Relevant personnel shall understand and be competent to perform their responsibilities under the SSI Supply Chain Traceability Standard.

3) 培训对象包括：采购、生产、仓储、物流、质量等相关岗位人员；

   Training shall cover personnel in procurement, production, warehousing, logistics, quality and other relevant positions.

4) 培训内容：

   Training content shall include:

- SSI 可追溯性标准要求

Requirements of the SSI Supply Chain Traceability Standard

- 物料隔离和标识方法

  Material-segregation and identification methods

- 转移记录管理

  Transfer-record management

- 物料核算程序

  Material-accounting procedures

- 投诉处理程序

  Complaint-handling procedures

1) 保存培训记录，保存期限不少于 10 年。

   Training records shall be retained for at least ten years.

8.1.4 记录保存 Record Retention

1) 维护涵盖所有适用要求的最新记录；

   Current records covering all applicable requirements shall be maintained.

2) 记录至少保存 10 年，或按照国家法规要求的更长期限；

   Records shall be retained for at least ten years or any longer period required by national law.

3) 记录包括：

   Records shall include:

- 供应商档案和评估记录

  Supplier files and assessment records

- 材料接收记录

  Material receipt records

- 转移记录

  Transfer records

- 库存记录

  Inventory records

- 对账记录

Reconciliation records

- 外包承包商清单和风险评估记录

  Lists of outsourced contractors and risk-assessment records

- 培训记录

  Training records

- 年度数量报告

  Annual quantity reports

8.1.5 验证　Verification

1) 建立系统，能够响应对其签发的转移文件进行验证的合理请求；

   A system shall be established to respond to reasonable requests to verify transfer documents issued by the Company.

2) 验证请求应在 10 个工作日内响应；

   Verification requests shall be answered within ten working days.

3) 验证结果应记录保存。

   Verification findings shall be documented and retained.

验证转移记录流程：

Transfer-record verification process:

1	硅料厂家发货提供对应随车单 The silicon-material manufacturer provides the corresponding delivery note with the shipment.
2	高景仓库收货扫码箱单并核对随车单，一致后上传随车单至高景溯源系统，货物放置待检区，检验合格后操作入库并移至溯源料放置区；不合格品则放置不合格品区联系厂家退回 Upon receipt, the Gokin warehouse scans the packing list and checks it against the delivery note. If the information is consistent, the delivery note is uploaded to the Gokin traceability system and the goods are placed in the inspection-pending area. Conforming goods are received into inventory and moved to the traceable-material storage area. Non-conforming goods are placed in the non-conforming area, and the manufacturer is contacted to arrange return.

3	高景溯源签收单整理人员从高景溯源系统中收集整理每日签收单做成台账并按合同号汇总 Personnel responsible for Gokin traceability receipt records collect daily signed receipt documents from the Gokin traceability system, maintain a register and consolidate records by contract number.
4	发货完成后硅料厂家提供合同、发货资料及生产、出入库等溯源资料给到高景溯源组 After shipment is completed, the silicon-material manufacturer provides the Gokin Traceability Team with the contract, shipping documents, and production, warehousing and dispatch traceability records.
5	高景溯源组人员核对所有硅料厂家溯源资料并与实际入库货物资料核对，没有问题则整理成文档保存；如有问题则做相应的问题反馈给硅料厂家或高景仓库 The Gokin Traceability Team reviews all traceability records supplied by the silicon-material manufacturer and reconciles them against the actual goods received. If no issue is identified, the records are compiled and archived. Any issue is reported to the silicon-material manufacturer or the Gokin warehouse, as applicable.
6	硅料厂家或高景仓库根据问题给出解决方案 The silicon-material manufacturer or the Gokin warehouse proposes a resolution to the identified issue.
7	溯源组人员再次复核，最终资料无误后存档留存 The Traceability Team reviews the records again and archives them after confirming that the final documentation is accurate.

8.1.6 管理评审　Management Review

1) 每年至少进行一次可追溯性管理体系有效性评审。

   The effectiveness of the traceability management system shall be reviewed at least annually.

2) 评审输入包括：

   Review inputs shall include:

- 内部审核结果

  Internal audit results

- 不符合项及整改情况

  Non-conformities and corrective-action status

- 投诉处理情况

Complaint-handling status

- 目标达成情况

  Progress against objectives

- 资源充分性

  Adequacy of resources

- 改进机会

  Improvement opportunities

1) 评审输出包括：

   Review outputs shall include:

- 改进措施

  Improvement measures

- 资源需求

  Resource requirements

- 目标调整建议

  Recommendations for adjusting objectives

1) 评审记录保存不少于 10 年。

   Management-review records shall be retained for at least ten years.

8.1.7 不一致与投诉　Discrepancies and Complaints

建立和实施流程，识别、调查和解决供应商、客户和其他利益相关方提出的关于认证材料生产、转移、接收或其他处理方面的不一致投诉：

A process shall be established and implemented to identify, investigate and resolve complaints raised by suppliers, customers or other stakeholders concerning discrepancies in the production, transfer, receipt or other handling of certified materials.

1) 投诉处理流程：

   The complaint-handling process shall include:

2) 接收投诉并登记

   Receive and register the complaint.

3) 初步评估（2 个工作日内）

Conduct a preliminary assessment within two working days.

4) 调查核实（15 个工作日内）

Investigate and verify within 15 working days.

5) 制定纠正措施

Develop corrective actions.

6) 反馈处理结果

Communicate the outcome.

7) 关闭归档

Close and archive the case.

8) 投诉记录保存不少于 10 年。

Complaint records shall be retained for at least ten years.

8.1.8 报告义务　Reporting Obligations

1) 每年 6 月 30 日前由 ESG、溯源组联合财务、PMC 向 SSI 秘书处报告以下信息：

The following information shall be reported to the SSI Secretariat by 30 June each year:

- 认证材料/产品的输入和输出数量；

  Input and output quantities of certified materials/products.

- 非认证材料/产品的流入和流出数量。

  Inflow and outflow quantities of non-certified materials/products.

1) 报告数据应与物料核算系统记录一致；

Reported data shall be consistent with records in the material-accounting system.

2) 报告经管理代表审核后提交。

Reports shall be reviewed by the Management Representative before submission.

8.2 物料核算系统　Material-Accounting System

8.2.1 合格供应商　Qualified Suppliers

1) 建立流程，确保仅从能够证明可追溯性体系符合 SSI 供应链可追溯性标准要求的合格供应商处接收标准范围内的材料；

A process shall ensure that materials within the Standard's scope are accepted only from qualified suppliers able to demonstrate that their traceability systems conform to the SSI Supply Chain Traceability Standard.

2) 未来，所有认证材料应从 SSI 认证供应商处采购:

In the future, all certified materials shall be sourced from SSI-certified suppliers.

供应商评估要点：

Supplier-assessment criteria shall include:

SSI 认证状态

SSI certification status

可追溯性体系成熟度

Maturity of the traceability system

材料隔离措施

Material-segregation measures

文件记录完整性

Completeness of documents and records

3) 历史合规记录

Historical compliance record

4) 建立《合格供应商清单》，定期更新。

A Qualified Supplier List shall be established and updated regularly.

8.2.2 内部物料控制　Internal Material Controls

1) 建立物料核算系统，从材料进入工厂到最终产品离开工厂，全程控制认证材料；

A material-accounting system shall control certified materials from entry into the factory through departure of the finished product.

2) 可追溯性记录应能在采购到销售的每个阶段关联认证材料；

Traceability records shall link certified materials at every stage from procurement through sale.

3) 覆盖环节：接收→检验→入库→加工→包装→储存→出库→运输→交付；

Covered stages shall include receipt -> inspection -> warehousing -> processing -> packaging ->

storage -> dispatch -> transportation -> delivery.

4) 每个环节均须有记录支持。

Each stage shall be supported by records.

8.2.3 隔离与标识 Segregation and Identification

1) 认证材料与非认证材料不得混合（如公司希望对认证产品做出声明）；

Certified material shall not be mixed with non-certified material where the Company intends to make a claim regarding certified products.

2) 识别认证材料可能与不合格和/或非认证材料混合的每个环节；

Every stage at which certified material could be mixed with non-conforming and/or non-certified material shall be identified.

3) 在所有阶段实施控制措施，确保材料隔离；

Controls shall be implemented at every stage to ensure material segregation.

4) 能够在整个生产过程中有效实施隔离；

Segregation shall be implemented effectively throughout production.

5) 隔离措施

Segregation Measures

环节 Stage	隔离措施 Segregation Measures
仓库 Warehouse	独立区域/货架、物理隔离、颜色标识（认证材料使用粉色标识） Dedicated areas or racks, physical separation and color coding; certified material is identified in pink
生产线 Production Line	指定车间/机台做物理隔离及标识进行可追溯产品生产 Designated workshops or machines with physical segregation and identification for producing traceable products
包装 Packaging	专用包装材料、SSI 认证标签 Dedicated packaging materials and SSI certification labels
运输 Transportation	专用运输工具或集装箱、密封管理 Dedicated vehicles or containers and seal controls

1) 在采购、接收、储存、制造、包装、标签、销售和运输的所有阶段，认证材料应被标识为认证材料；

   Certified material shall be identified as certified at all stages of procurement, receipt, storage, manufacturing, packaging, labeling, sale and transportation.

2) 标识内容至少包括："SSI Certified"（待通过后，没通过没有编号）、认证编号、材料描述、批次号。

   Identification shall include, at a minimum, 'SSI Certified' (After approval, those that did not pass will not be numbered）, the certification number, material description and batch number.

8.2.4 对账 Reconciliation

1) 建立和实施内部系统，对账材料总量与会计期间内的进出库存变动；

   An internal system shall be established and implemented to reconcile total material quantities with inbound, outbound and inventory movements during the accounting period.

2) 物料核算期间不超过 12 个月；

   The material-accounting period shall not exceed 12 months.

3) 能够解释和记录生产过程中的合理损耗；

   Reasonable production losses shall be explained and documented.

4) 对账差异超过 2%时，须调查原因并采取纠正措施；

   Where a reconciliation variance exceeds 2%, the cause shall be investigated and corrective action taken.

5) 对账记录保存不少于 10 年。

   Reconciliation records shall be retained for at least ten years.

8.2.5 文件记录 Documented Records

1) 内部系统应核实和记录每批材料的装运内容；

   The internal system shall verify and record the contents of each material shipment.

2) 发现错误后，应记录错误并采取商定的纠正步骤；

   Any error shall be documented, and agreed corrective steps shall be taken.

每批即将到来的材料应记录以下信息：

The following information shall be recorded for each incoming material batch:

接收日期

Date of receipt

供应商详细信息（名称、类型、地点等）

Supplier details, including name, type and location

材料描述

Material description

不含包装的重量

Weight excluding packaging

生产过程中使用的材料的唯一识别号

Unique identification number of material used in production

3) 来自 SSI 认证供应商的材料的转移记录参考号（为保持不间断的隔离监管链，该编号应在整个供应链中保持一致）

   Transfer-record reference number for material from an SSI-certified supplier; to maintain an uninterrupted segregated chain of custody, this number shall remain consistent throughout the supply chain

4) 收集并保存所有采购材料的标准范围内的供应链文档，以证明材料来源。

   Supply chain documents within the Standard's scope shall be collected and retained for all purchased materials to evidence material origin.

8.2.6 转移记录 Transfer Records

1) 确保即将到来的认证材料附有有效的转移记录；

   Each incoming certified-material shipment shall be accompanied by a valid transfer record.

2) 转移记录应物理或数字附加到每批发往其他 SSI 认证站点、外包承包商或服务公司的认证材料装运；

   A transfer record shall be attached physically or digitally to every certified-material shipment sent to another SSI-certified site, outsourced contractor or service provider.

3) 确认收到的材料与转移记录上的信息匹配；

The received material shall be confirmed as matching the information in the transfer record.

4) 建立流程，分离收到的材料，在所有文件收到、审查和验证之前不开始加工；

A process shall segregate received material and prevent processing until all documents have been received, reviewed and verified.

5) 每次认证材料保管权变更时，应由当前持有认证材料的工厂更新转移记录；

Whenever custody of certified material changes, the transfer record shall be updated by the facility currently holding the material.

6) 转移记录在签发工厂继续参与 SSI 认证计划期间保持有效；

A transfer record remains valid while the issuing facility continues to participate in the SSI certification program.

7) SSI 认证站点名单在 SSI 官网实时更新，如站点不再持有有效认证，SSI 秘书处将通知标准用户；

The list of SSI-certified sites is updated in real time on the SSI website. If a site no longer holds valid certification, the SSI Secretariat will notify users of the Standard.

8) 认证状态变更前供应的材料不受影响，但变更后供应的材料不再被视为认证材料。

Material supplied before a change in certification status is unaffected, but material supplied after the change will no longer be considered certified.

8.2.7 贸易商管理　Trader Management

1) 对通过贸易商采购的标准范围内材料供应商进行尽职调查；

Due diligence shall be conducted on suppliers of in-scope materials purchased through traders.

2) 评估潜在的环境、社会或治理风险；

Potential environmental, social and governance risks shall be assessed.

3) 采取合理行动预防或缓解风险，符合 SSI ESG 标准第 5 节负责任采购要求；

Reasonable action shall be taken to prevent or mitigate risks in accordance with the responsible-sourcing requirements in Section 5 of the SSI ESG Standard.

4) 绘制所有参与采购标准范围内材料的贸易商图谱；

All traders involved in the procurement of in-scope materials shall be mapped.

5) 贸易商须纳入供应商管理体系。

Traders shall be included in the supplier-management system.

8.3 合格材料 Eligible Materials

1) SSI 供应链可追溯性标准目前涵盖硅作为认证材料；

The SSI Supply Chain Traceability Standard currently covers silicon as a certified material.

2) 涵盖从石英矿开采、冶金级硅、多晶硅到硅棒/硅片、电池和组件的所有层级；

The scope covers all tiers from quartz mining and metallurgical-grade silicon through polysilicon, silicon rods/wafers, cells and modules.

3) 未来可能扩展到玻璃、铝、铜等其他材料；

The scope may be expanded in the future to other materials such as glass, aluminum and copper.

4) 公司应关注 SSI 标准更新，及时调整管理范围。

The Company shall monitor updates to SSI standards and adjust the management scope promptly.

8.4 外包承包商 Outsourced Contractors

8.4.1 使用条件 Conditions of Use

1) 不得将认证材料转移给外包承包商，除非满足以下条件：

Certified material shall not be transferred to an outsourced contractor unless all of the following conditions are met:

- 公司保留所有材料的所有权；

  The Company retains ownership of all material.

- 对每个外包承包商进行风险评估，评估潜在的不符合 SSI 供应链可追溯性标准的风险，并确定风险可接受；

  A risk assessment is conducted for each outsourced contractor to evaluate potential non-conformance with the SSI Supply Chain Traceability Standard, and the risk is determined to be acceptable.

- 审查承包商的流程，了解认证材料与非认证材料混合的潜在风险；

  The contractor's processes are reviewed to understand the potential risk of mixing certified and non-certified materials.

- 合同要求使用隔离模型防止材料混合；

  The contract requires the segregated model to prevent material mixing.

- 外包承包商应有符合本标准第 2 节的内部物料控制管理体系；

  The outsourced contractor has an internal material-control management system meeting Section 2 of the Standard.

1) 禁止外包承包商将任何活动分包给其他公司；

   Outsourced contractors shall not subcontract any activity to another company.

2) 高风险承包商（如混合材料的承包商）应接受第三方或第二方审计。

   High-risk contractors, such as contractors that handle mixed materials, shall undergo a second- or third-party audit.

8.4.2 材料返回 Return of Material

1) 核实和记录每次材料返回转移；

   Each return transfer of material shall be verified and recorded.

2) 与签发时的转移文件一致，考虑外包承包商加工或制造导致的预期变化；

   The return shall be consistent with the transfer document issued, allowing for expected changes resulting from processing or manufacturing by the outsourced contractor.

3) 如有不一致，不得签发后续转移文件；

   Where a discrepancy exists, no subsequent transfer document may be issued.

4) 调查不一致原因，采取纠正措施。

   The cause of the discrepancy shall be investigated, and corrective action shall be taken.

8.4.3 范围与记录 Scope and Records

1) 任何未获得 SSI 认证但持有公司认证材料的外包承包商应纳入公司的认证范围；

   Any outsourced contractor that is not SSI-certified but holds the Company's certified material shall be included within the Company's certification scope.

2) 维护所有外包承包商清单和风险评估记录；

   A list of all outsourced contractors and their risk-assessment records shall be maintained.

3) 鼓励外包承包商获得 SSI 认证。

Outsourced contractors shall be encouraged to obtain SSI certification.

8.5 声明管理 Claims Management

1) 仅在被 SSI 授予批准后，方可宣传产品为认证产品或使用 SSI 标识或其他商标；

A product may be promoted as certified, or the SSI logo or other trademark used, only after approval has been granted by SSI.

2) 如对产品中的认证材料做出声明或陈述，应以书面形式描述；

Any claim or representation concerning certified material in a product shall be documented in writing.

3) 不得包含与供应认证材料的转移文件不一致的信息；

A claim shall not contain information inconsistent with the transfer document for the certified material supplied.

4) 认证站点应按照 SSI 声明指南做出声明；

Certified sites shall make claims in accordance with the SSI Claims Guide.

5) 市场部和销售部负责声明的合规性审查。

The Marketing and Sales Departments are responsible for reviewing claims for compliance.

9.文件与记录管理 Document and Record Management

9.1 文件控制 Document Control

9.1.1 文件分类 Document Classification

层级 Level	文件类型 Document Type	示例 Example
一级 Level 1	政策文件 Policy	ESG 政策、人权政策、反腐败政策 ESG Policy, Human Rights Policy and Anti-Corruption Policy
二级 Level 2	管理手册 Management Manual	本手册 This Manual
三级 Level 3	程序文件 Procedure	风险评估程序、采购管理程序 Risk Assessment Procedure and Procurement Management Procedure

层级 Level	文件类型 Document Type	示例 Example
四级 Level 4	作业指导书 Work Instruction	物料隔离操作指导、转移记录填写规范 Material-Segregation Work Instruction and Transfer-Record Completion Guide
五级 Level 5	记录表单 Record Form	各类记录、报告、清单 Records, reports and registers

9.1.2 文件控制要求　Document-Control Requirements

1) 文件发布前须经授权人审批；

Documents shall be approved by authorized personnel before issue.

2) 文件应标识版本号和生效日期；

Documents shall display a version number and effective date.

3) 文件修订后应及时更新并传达至使用处；

Revised documents shall be updated and communicated promptly at points of use.

4) 作废文件应及时收回，防止误用；

Obsolete documents shall be withdrawn promptly to prevent unintended use.

5) 文件应清晰、易于识别和检索；

Documents shall be clear, identifiable and retrievable.

6) 外来文件（如法律法规、标准）应识别和控制。

External documents, including laws, regulations and standards, shall be identified and controlled.

9.2 记录管理　Record Management

9.2.1 记录清单　Record Register

各部门建立《记录清单》，明确：

The Management Systems Department shall maintain a Record Register specifying:

1) 记录名称

Record name

2) 责任部门

Responsible department

3) 保存期限

Retention period

4) 保存方式（纸质/电子）

Retention format, paper or electronic

5) 保存地点

Storage location

9.2.2 保存期限 Retention Periods

记录类别 **Record Category**	保存期限 **Retention Period**
ESG 及可追溯性管理体系文件 ESG and traceability management-system documents	持续更新，旧版本保存 3 年 Update continuously; retain superseded versions for three years
风险评估记录 Risk-assessment records	10 年 10 years
培训记录 Training records	10 年 10 years
内部审核记录 Internal audit records	10 年 10 years
管理评审记录 Management-review records	10 年 10 years
排放数据 Emissions data	10 年 10 years
环境监测数据 Environmental monitoring data	10 年 10 years
工伤事故记录 Occupational injury records	永久 Permanent
员工档案 Employee files	法定要求 As required by law
供应商档案 Supplier files	合作关系终止后 10 年 10 years after termination of the business relationship

记录类别 **Record Category**	保存期限 **Retention Period**
采购记录 Procurement records	10 年 10 years
生产记录 Production records	10 年 10 years
转移记录 Transfer records	10 年 10 years
库存记录 Inventory records	10 年 10 years
对账记录 Reconciliation records	10 年 10 years
投诉处理记录 Complaint-handling records	10 年 10 years
年度数量报告 Annual quantity reports	10 年 10 years

9.2.3 电子记录　Electronic Records

1) 电子记录应定期备份，备份频率不少于每月一次；

Electronic records shall be backed up regularly, at least once per month.

2) 电子记录应设置访问权限，防止未经授权的修改；

Access controls shall be applied to electronic records to prevent unauthorized modification.

3) 电子签名应符合相关法律法规要求；

Electronic signatures shall comply with applicable laws and regulations.

4) 电子记录应确保可读性和完整性。

Electronic records shall remain legible and complete.

10.内部审核与管理评审　Internal Audit and Management Review

10.1 内部审核　Internal Audit

10.1.1 审核计划　Audit Plan

1) ESG 部每年初制定《年度内部审核计划》；

The ESG Department shall prepare an Annual Internal Audit Plan at the beginning of each year.

2) 审核范围覆盖本手册所有适用要求；

The audit scope shall cover all applicable requirements of this Manual.

3) 审核频率：每年至少一次全面审核；

A comprehensive audit shall be conducted at least annually.

4) 特殊情况可增加审核频次。

Audit frequency may be increased under special circumstances.

10.1.2 审核实施　Audit Implementation

1) 审核员须经过培训，独立于被审核部门；

Auditors shall be trained and independent of the department being audited.

2) 审核前发出审核通知，准备审核检查表；

An audit notice shall be issued and an audit checklist prepared before the audit.

3) 审核通过文件审查、现场观察、人员访谈等方式进行；

Audits shall be conducted through document review, on-site observation, personnel interviews and other appropriate methods.

4) 审核发现分为：符合、观察项、不符合项；

Audit findings shall be classified as conformity, observation or non-conformity.

5) 不符合项分为：严重不符合、一般不符合。

Non-conformities shall be classified as major or minor.

10.1.3 审核报告　Audit Report

1) 审核结束后 10 个工作日内编制《内部审核报告》；

An Internal Audit Report shall be prepared within ten working days after completion of the audit.

2) 报告内容包括：审核目的、范围、依据、发现、结论、建议；

The report shall include the audit purpose, scope, criteria, findings, conclusions and recommendations.

3) 报告分发至相关部门和高级管理层。

The report shall be distributed to relevant departments and senior management.

10.1.4 不符合项整改　Remediation of Non-Conformities

1) 责任部门在收到不符合项报告后 15 个工作日内制定纠正措施计划；

   The responsible department shall develop a corrective-action plan within 15 working days of receiving a non-conformity report.

2) 纠正措施应针对根本原因，防止再发生；

   Corrective actions shall address root causes and prevent recurrence.

3) 体系部跟踪纠正措施实施情况；

   The Management Systems Department shall track implementation of corrective actions.

4) 严重不符合项须在 30 个工作日内完成整改；

   Major non-conformities shall be remediated within 30 working days.

5) 一般不符合项须在 60 个工作日内完成整改。

   Minor non-conformities shall be remediated within 60 working days.

10.2 管理评审　Management Review

10.2.1 评审频次　Review Frequency

每年至少进行一次管理评审，由 ESG 部主持。

A management review shall be conducted at least annually and chaired by the ESG Department.

10.2.2 评审输入　Review Inputs

1) 内部审核结果；

   Internal audit results

2) 利益相关方反馈和投诉；

   Stakeholder feedback and complaints

3) ESG 及可追溯性绩效数据；

   ESG and traceability performance data

4) 目标达成情况；

   Progress against objectives

5) 纠正和预防措施实施情况；

   Implementation of corrective and preventive actions

6) 以往管理评审措施跟踪；

Follow-up of actions from previous management reviews

7) 法律法规变化；

Changes in laws and regulations

8) 资源充分性；

Adequacy of resources

9) 改进机会。

Improvement opportunities

10.2.3 评审输出　Review Outputs

1) 管理体系及其过程的改进措施；

Measures to improve the management system and its processes

2) 与利益相关方要求相关的改进措施；

Measures to improve performance against stakeholder requirements

3) 资源需求；

Resource requirements

4) 目标调整建议

Recommendations for adjusting objectives

11.持续改进　Continuous Improvement

11.1 改进机制　Improvement Mechanism

1) 公司建立持续改进机制，通过以下方式推动 ESG 及可追溯性绩效提升：

The Company shall maintain a continuous-improvement mechanism and improve ESG and traceability performance through:

2) 目标管理：设定具有挑战性的目标，定期评估进展

Objective management: set challenging objectives and assess progress regularly

3) 标杆管理：与行业最佳实践对标

Benchmarking: compare performance against industry best practices

4) 创新激励：鼓励员工提出改进建议

Innovation incentives: encourage employees to propose improvements

5) 技术应用：采用数字化工具提升管理效率

Technology application: use digital tools to improve management efficiency

11.2 改进流程 Improvement Process

识别改进机会→分析原因→制定措施→实施措施→验证效果→标准化→持续监测

Identify improvement opportunity → analyze cause → develop measures → implement measures → verify effectiveness → standardize → monitor continuously

11.3 员工参与 Employee Participation

1) 建立员工建议制度，鼓励员工提出 ESG 及可追溯性改进建议；

An employee suggestion program shall encourage employees to propose ESG and traceability improvements.

2) 对优秀建议给予奖励；

Outstanding suggestions shall be rewarded.

3) 定期组织 ESG 及安全改善活动。

ESG and safety improvement activities shall be organized regularly.

12.附录 Appendices

附录 A：SSI 标准参考文件清单 Appendix A: Reference Documents for SSI Standards

序号 No.	文件名称 Document	发布机构 Issuing Organization
1	SSI ESG Standard V1.2	SSI
2	SSI Supply Chain Traceability Standard V1.0	SSI
3	SSI Assurance Manual	SSI
4	SSI Claims Guide	SSI
5	ISO 22095:2020 Chain of Custody	ISO
6	OECD Due Diligence Guidance	OECD
7	UN Guiding Principles on Business and Human Rights	UN

序号 No.	文件名称 Document	发布机构 Issuing Organization
8	GHG Protocol	WRI/WBCSD

附录 B：相关国际公约与标准清单 Appendix B: Relevant International Conventions and Standards

ILO 公约 ILO Conventions:

- ILO 第 1 号：工作时间（工业）公约，1919 年

  ILO Convention No. 1: Hours of Work (Industry) Convention, 1919
- ILO 第 14 号：每周休息（工业）公约，1921 年

  ILO Convention No. 14: Weekly Rest (Industry) Convention, 1921
- ILO 第 29 号：强迫劳动公约，1930 年

  ILO Convention No. 29: Forced Labour Convention, 1930
- ILO 第 87 号：结社自由和保护组织权利公约，1948 年

  ILO Convention No. 87: Freedom of Association and Protection of the Right to Organise Convention, 1948
- ILO 第 98 号：组织权利和集体谈判权利公约，1949 年

  ILO Convention No. 98: Right to Organise and Collective Bargaining Convention, 1949
- ILO 第 100 号：同酬公约，1951 年

  ILO Convention No. 100: Equal Remuneration Convention, 1951
- ILO 第 105 号：废除强迫劳动公约，1957 年

  ILO Convention No. 105: Abolition of Forced Labour Convention, 1957
- ILO 第 111 号：歧视（就业和职业）公约，1958 年

  ILO Convention No. 111: Discrimination (Employment and Occupation) Convention, 1958
- ILO 第 132 号：带薪休假公约，1970 年

  ILO Convention No. 132: Holidays with Pay Convention (Revised), 1970
- ILO 第 138 号：最低年龄公约，1973 年

ILO Convention No. 138: Minimum Age Convention, 1973

- ILO 第 182 号：最恶劣形式童工劳动公约，1999 年

  ILO Convention No. 182: Worst Forms of Child Labour Convention, 1999

环境公约 Environmental Conventions:

- 《关于汞的水俣公约》

  Minamata Convention on Mercury

- 《斯德哥尔摩持久性有机污染物公约》

  Stockholm Convention on Persistent Organic Pollutants

- 《控制危险废物越境转移及处置的巴塞尔公约》

  Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal

- 《鹿特丹公约》

  Rotterdam Convention