



环境管理政策

Environmental Management Policy

1. 目的与依据 Purpose and Basis

高景太阳能股份有限公司（以下简称“高景太阳能”或“公司”）坚持绿色低碳和预防污染，系统管理生产经营及价值链对气候、能源、水资源、空气、土壤、废弃物、化学品和生物多样性的影响。本政策旨在明确环境治理原则、职责和实施要求，保护生态环境与社区健康，并持续提升环境绩效。

Gokin Solar Co., Ltd. (hereinafter referred to as “Gokin Solar” or “the Company”) is committed to green and low-carbon development and pollution prevention. The Company systematically manages impacts on climate, energy, water, air, soil, waste, chemicals, and biodiversity across operations and the value chain. This Policy defines governance principles, responsibilities, and implementation requirements to protect ecosystems and community health and continually improve environmental performance.

本政策依据业务所在地适用的环境保护、节约能源、水资源、污染防治、化学品和生物多样性法律法规制定，并参考《联合国气候变化框架公约》及《巴黎协定》《生物多样性公约》《关于汞的水俣公约》《控制危险废物越境转移及其处置的巴塞尔公约》《斯德哥尔摩持久性有机污染物公约》《鹿特丹公约》以及 ISO 14001 等国际原则和标准。

This Policy is developed in accordance with applicable laws on environmental protection, energy conservation, water, pollution control, chemicals, and biodiversity. It also refers to the UN Framework Convention on Climate Change and Paris Agreement, Convention on Biological Diversity, Minamata Convention on Mercury, Basel Convention, Stockholm Convention, Rotterdam Convention, and international standards including ISO 14001.

2. 适用范围 Scope

本政策适用于高景太阳能股份有限公司及其控股子公司、各生产基地和经营单位，以及全体工作人员。公司要求供应商、承包商、物流服务商和其他合作伙伴遵守业务所在地的环境法律法规，并通过合同、供应商行为准则、尽职调查、审核和能力建设推动其遵循本政策原则。

This Policy applies to Gokin Solar Co., Ltd., controlled subsidiaries, production bases, operating entities, and all personnel. Suppliers, contractors, logistics providers, and other partners are required to comply with environmental laws in their operating locations, and the Company promotes alignment with this Policy through contracts, supplier codes, due diligence, audits, and capacity building.

3. 定义 Definitions

3.1 环境因素 Environmental Aspect

公司活动、产品或服务中能够与环境发生相互作用的要素。

An element of the Company's activities, products, or services that interacts or can interact with the environment.

3.2 环境影响 Environmental Impact

全部或部分由环境因素造成的有利或不利的环境变化。

A beneficial or adverse change to the environment resulting wholly or partly from an environmental aspect.

3.3 污染预防 Pollution Prevention

为避免、减少或控制污染物或废弃物的产生、排放或释放而采用的过程、技术、材料、服务或能源，包括源头削减、替代、再利用、回收和妥善处置。

Processes, practices, techniques, materials, services, or energy used to avoid, reduce, or control the generation, emission, or release of pollutants or waste, including source reduction, substitution, reuse, recycling, and proper disposal.

4. 职责 Responsibilities

4.1 战略与可持续发展委员会及高级管理层 Strategy and Sustainability Committee and Senior Management

监督公司环境战略、重大风险、目标和绩效，推动资源配置并审议重大环境事项。

Oversee environmental strategy, material risks, targets, and performance, support resource allocation, and review significant environmental matters.

4.2 ESG 管理部门 ESG Management Department

统筹环境议题的战略协同、目标与指标管理、绩效汇总、利益相关方沟通和信息披露，推动环境管理要求融入公司整体风险与可持续发展管理。

Coordinate environmental strategy, targets and indicators, performance consolidation, stakeholder communication, and disclosure, and integrate environmental requirements into enterprise risk and sustainability management.

4.3 环境、健康与安全及设施管理相关职能 Environment, Health and Safety, and Facilities Functions

组织环境因素识别、合规评价、污染防治、能源和水资源管理、废弃物及化学品管理、监测、应急响应、检查和整改，并为各单位提供专业支持。

Organize aspect identification, compliance evaluation, pollution prevention, energy and water management, waste and chemical management, monitoring, emergency response, inspections, and corrective action, and provide technical support to operating units.

4.4 采购与供应链管理部门 Procurement and Supply Chain Management

将环境要求纳入供应商准入、风险分级、合同、尽职调查、现场审核、绩效评价和改进计划，重点管理高环境风险原材料、地区和供应商。

Integrate environmental requirements into supplier onboarding, risk classification, contracts, due diligence, on-site audits, performance evaluation, and improvement plans, focusing on high-risk materials, regions, and suppliers.

4.5 各生产基地、业务部门和全体工作人员 Production Bases, Business Functions, and All Personnel

落实本政策及相关制度，识别并控制本单位环境风险，准确记录数据，依法运行污染防治设施，及时报告异常并参与培训和改进活动。

Implement this Policy and related procedures, identify and control local environmental risks, maintain accurate records, lawfully operate pollution-control facilities, promptly report abnormalities, and participate in training and improvement activities.

5. 管理流程 Management Process

识别环境因素和合规义务→评估风险与机会→制定目标、指标和方案→配置资源并实施控制→监测与合规评价→事件响应和纠正措施→管理评审、披露与持续改进。

Identify environmental aspects and compliance obligations → assess risks and opportunities → set targets, indicators, and action plans → allocate resources and implement controls → monitor and

evaluate compliance → respond to incidents and take corrective action → management review, disclosure, and continual improvement.

6. 环境管理要求 Environmental Management Requirements

6.1 合规、风险评估与许可管理 Compliance, Risk Assessment, and Permits

公司识别并更新适用的环境法律、排放标准、许可和其他义务，定期开展合规评价。新建、扩建、改建、并购及重大工艺变化在决策前开展环境和生态影响评估，依法取得审批或许可，并将环境风险、气候风险和自然相关风险纳入项目及企业风险管理。

The Company identifies and updates applicable environmental laws, emission standards, permits, and other obligations and periodically evaluates compliance. New construction, expansion, renovation, acquisitions, and material process changes are subject to environmental and ecological impact assessment before approval, with required permits obtained and environmental, climate, and nature-related risks integrated into project and enterprise risk management.

6.2 能源、温室气体与气候行动 Energy, Greenhouse Gas, and Climate Action

公司建立能源与温室气体管理机制，按照适用标准核算范围一、范围二及重要范围三排放，识别气候风险与机会，制定并定期评估减排和能效目标。公司推进节能技术、智慧能源管理、设备效率提升、可再生能源使用和产品碳足迹管理，并推动关键供应商开展核算和减排行动。任何气候目标或声明应以可靠数据和经批准的行动计划为依据。

The Company maintains energy and greenhouse gas management mechanisms, accounts for Scope 1, Scope 2, and material Scope 3 emissions under applicable standards, identifies climate risks and opportunities, and establishes and periodically reviews reduction and efficiency targets. It advances energy-saving technologies, smart energy management, equipment efficiency, renewable electricity, and product carbon footprint management and encourages key suppliers to measure and reduce emissions. Climate targets and claims must be supported by reliable data and approved action plans.

6.3 水资源与废水管理 Water and Wastewater Management

各基地识别流域水风险和用水密集环节，监测取水、耗水、排水和水质，推进节水、循环利用、中水及浓水回用和雨水利用。公司依法取水和排水，确保废水处理设施稳定运行和达标排放，预防对地下水、地表水和社区用水造成不利影响；水压力较高地区制定加强措施。

Each site identifies basin-level water risks and water-intensive processes, monitors withdrawal, consumption, discharge, and quality, and advances conservation, recycling, reclaimed and concentrated water reuse, and rainwater utilization. Water is withdrawn and discharged lawfully, treatment facilities operate reliably, and adverse impacts on groundwater, surface water, and community water access are prevented. Enhanced measures are developed for water-stressed locations.

6.4 大气排放、噪声与土壤保护 Air Emissions, Noise, and Soil Protection

公司控制颗粒物、挥发性有机物、酸碱废气及其他污染物排放，定期维护治理设施并依法监测。对厂界噪声、照明、异味、粉尘和运输活动采取控制措施，预防对员工、社区和生态环境的不利影响。危险化学品和油品区域实施防渗、防泄漏和二次围堰，发现土壤或地下水污染时及时控制、调查和修复。

The Company controls particulate matter, volatile organic compounds, acidic or alkaline exhaust, and other pollutants, maintains treatment facilities, and monitors emissions as required. Boundary noise, lighting, odor, dust, and transportation impacts are controlled to protect employees, communities, and ecosystems. Chemical and oil areas use impermeable surfaces, leak prevention, and secondary containment. Suspected soil or groundwater contamination is promptly contained, investigated, and remediated.

6.5 废弃物与循环经济 Waste and Circular Economy

公司遵循源头减量、再使用、再循环、资源化和合规处置的优先顺序，建立废弃物分类、称量、台账、标识、贮存、转移和处置要求。危险废物由具备相应资质的单位处理，转移过程符合法律及追踪要求。公司定期评估资源效率、包装减量、材料替代和副产物资源化机会，禁止非法倾倒、焚烧或转移废弃物。

The Company follows the hierarchy of prevention, reuse, recycling, recovery, and compliant disposal and maintains requirements for segregation, weighing, records, labeling, storage, transfer, and treatment. Hazardous waste is handled by qualified parties and transferred in compliance with legal and tracking requirements. Resource efficiency, packaging reduction, material substitution, and by-product recovery opportunities are periodically assessed. Illegal dumping, burning, or transfer of waste is prohibited.

6.6 化学品与有害物质管理 Chemicals and Hazardous Substances

公司对化学品实施采购审批、清单和安全技术说明书管理、相容性评估、标签、分区储存、领用、运输和废弃全流程控制，优先替代高危害物质，并确保应急设施和个人防护装备可用。产品和生产过程遵守适用的禁限用物质要求。

Chemicals are controlled throughout procurement approval, inventory and safety data sheet management, compatibility assessment, labeling, segregated storage, issuance, transportation, and disposal. Higher-hazard substances are prioritized for substitution, and emergency facilities and personal protective equipment are maintained. Products and processes comply with applicable restricted substance requirements.

6.7 生物多样性与土地利用 Biodiversity and Land Use

公司按照《高景太阳能生物多样性保护政策》识别运营及价值链对自然的依赖、影响、风险和机会，并遵循“避免—减缓—修复/恢复—补偿”的缓解层级。项目优先使用成熟工商业用地和棕地，避免在自然保护地、生物多样性关键区、关键栖息地、重要湿地、天然林及其他生态敏感区域开展可能造成重大影响的活动。公司禁止非法捕猎、采集、交易野生动植物，防止外来入侵物种传播，并优先使用乡土物种开展生态恢复。

In accordance with the Gokin Solar Biodiversity Conservation Policy, the Company identifies nature-related dependencies, impacts, risks, and opportunities and applies the mitigation hierarchy of avoid, minimize, restore or rehabilitate, and offset. Projects prioritize established industrial and commercial land and brownfields and avoid activities likely to cause material impacts in protected areas, Key Biodiversity Areas, critical habitats, important wetlands, natural forests, and other sensitive areas. Illegal hunting, collection, or trade in wildlife is prohibited, invasive alien species are controlled, and native species are prioritized in restoration.

6.8 供应链环境管理 Supply Chain Environmental Management

公司根据品类、地区、排放、用水、污染和生物多样性风险对供应商分级，并采取问卷、文件审查、现场审核、整改跟踪和培训等措施。供应商应依法取得环境许可，控制排放和废弃物，预防生态破坏，准确提供环境数据，并及时报告可能影响公司的重大环境事件。

Suppliers are classified by category, geography, emissions, water, pollution, and biodiversity risk and are managed through questionnaires, document reviews, on-site audits, corrective-action tracking,

and training. Suppliers must obtain required environmental permits, control emissions and waste, prevent ecological damage, provide accurate environmental data, and promptly report significant environmental incidents that may affect the Company.

6.9 应急准备与响应 Emergency Preparedness and Response

公司识别化学品泄漏、火灾次生污染、废水异常、危险废物遗失、极端天气和其他环境紧急情况，制定预案，配置物资，明确报告和外部联络要求，并定期演练。事件发生后立即控制污染、保护人员和环境、依法报告、调查原因并落实纠正预防措施。

The Company identifies chemical spills, secondary pollution from fire, abnormal wastewater discharge, hazardous waste loss, extreme weather, and other environmental emergencies; develops plans; maintains response resources; defines reporting and external communication; and conducts exercises. Incidents are immediately contained to protect people and the environment, lawfully reported, investigated, and followed by corrective and preventive action.

6.10 培训与环境文化 Training and Environmental Culture

公司根据岗位风险开展入职、年度和专项环境培训，覆盖合规义务、节能节水、废弃物分类、化学品、应急响应和生物多样性等内容。公司鼓励员工提出环境改进建议，并将环境责任融入日常运营和绩效改进。

Risk-based induction, annual, and specialized environmental training covers compliance obligations, energy and water conservation, waste segregation, chemicals, emergency response, and biodiversity. Employees are encouraged to propose improvements, and environmental accountability is integrated into daily operations and performance improvement.

7. 申诉与利益相关方参与 Grievances and Stakeholder Engagement

公司与监管机构、员工、社区、客户、供应商、专业机构和社会组织开展适当沟通，关注环境影响和社区诉求，并以可理解的方式提供必要信息。可能对社区造成显著影响的项目或事件，应及时开展沟通并采取减缓和补救措施。

The Company engages, as appropriate, with regulators, employees, communities, customers, suppliers, professional institutions, and civil society organizations, considers environmental impacts and community concerns, and provides necessary information in an understandable manner. Projects or incidents that may materially affect communities require timely engagement, mitigation, and remedy.

利益相关方可实名或匿名通过以下渠道提出申诉、投诉或举报：

电子邮箱 shenjibu@gokin.com；

举报电话/短信 15692038078；

举报微信二维码；

公司及各基地官方微信公众号“联系我们—举报渠道”；

各基地举报信箱或邮寄至广东省珠海市金湾区三灶镇湖滨路 1566 号高景太阳能股份有限公司审计委员会（收）。

Stakeholders may raise grievances, complaints, or reports openly or anonymously through the following channels: email at shenjibu@gokin.com; hotline/SMS at +86 15692038078; WeChat QR Code; the “Contact Us - Reporting Channel” on the official WeChat accounts of the Company and its production bases; reporting mailboxes at each production base; or correspondence to the Audit Committee of Gokin Solar Co., Ltd., No. 1566 Hubin Road, Sanzao Town, Jinwan District, Zhuhai, Guangdong, China.

环境申诉按照接收、登记、评估、调查、反馈、整改和跟踪的程序处理。公司保护举报人和协助调查人员的身份信息，对打击报复实行零容忍。具体要求按照《高景太阳能申诉、投诉与举报管理政策》执行。

Environmental grievances are handled through receipt, registration, assessment, investigation, feedback, corrective action, and follow-up. The identities of reporters and persons assisting investigations are protected, and retaliation is not tolerated. Detailed requirements follow the Gokin Solar Grievance, Complaint and Reporting Management Policy.

8. 监测、披露与审查 Monitoring, Disclosure, and Review

公司根据重要环境因素和目标建立指标，监测能源、温室气体、水、废水、废气、废弃物、化学品、环境事件、生物多样性及供应链绩效。数据应可追溯、准确并经适当审核。公司通过 ESG 报告、官方网站或其他适当渠道披露环境管理进展，确保披露与实际绩效一致。

The Company establishes indicators for material aspects and targets and monitors energy, greenhouse gases, water, wastewater, air emissions, waste, chemicals, incidents, biodiversity, and supply chain performance. Data must be traceable, accurate, and appropriately reviewed.

Environmental progress is disclosed through ESG reports, the corporate website, or other appropriate channels and must remain consistent with actual performance.

本政策原则上每年至少审查一次，并在法律法规、业务活动、重大风险或事故发生重大变化时及时修订。管理评审应考虑目标达成、合规状态、监测结果、事件、申诉、审核和整改情况，推动持续改进。本政策由高级管理层、董事长签批。

This Policy is reviewed at least annually in principle and updated following material changes in law, operations, risk, or incidents. Management review considers target performance, compliance status, monitoring results, incidents, grievances, audits, and corrective action to support continual improvement. This policy was approved by the senior management and the chairman.