

高景太阳能股份有限公司

负责任矿产管理政策

Responsible Minerals Management Policy of Gokin Solar Co., Ltd.

1. 引言

1. Introduction

高景太阳能股份有限公司及其下属公司（以下简称“高景”）致力于推行负责任供应链管理，将负责任矿产采购管理纳入负责任采购管理体系。高景不仅关注金、钨、钽、锡等冲突矿产，也将硅（Silicon）及相关硅基材料纳入负责任矿产管理范围，推动供应链上下游开展风险识别、尽职调查、来源追溯和风险缓解，共同促进矿产和材料的负责任采购、生产与使用。

Gokin Solar Co., Ltd. and its subsidiaries (hereinafter referred to as "Gokin") are committed to promoting responsible supply chain management and integrating responsible mineral procurement management into the responsible procurement management system. Gokin not only focuses on conflict minerals such as gold, tungsten, tantalum, and tin, but also includes silicon and related silicon-based materials within the scope of responsible mineral management. It drives risk identification, due diligence, source tracing, and risk mitigation across the upstream and downstream supply chain, jointly fostering the responsible procurement, production, and use of minerals and materials.

2. 范围

2. Scope

本政策适用于高景本部及全部下属全资、控股子公司；全体董事、高级管理人员及在岗员工须严格遵照执行；同时，我们鼓励外部战略合作方、上游供应商、下游渠道伙伴共同遵守本政策。

This policy applies to Gokin's headquarters and all its wholly-owned and controlled subsidiaries. All directors, senior management, and employees are required to strictly comply with it. At the same time, we encourage external strategic partners, upstream suppliers, and downstream channel partners to jointly observe this policy.

本政策所称负责任矿产，是指高景产品、生产运营及供应链中涉及的矿产、矿物及其衍生材料，包括但不限于来自受冲突影响和高风险区域（Conflict-Affected and High-Risk Areas, CAHRAs）的金、钨、钽、锡、硅、钴、云母等矿产，以及具有较高环境、社会、人权、

劳工、社区、商业道德或可追溯性风险的高影响材料（**High-impact Materials**）。高景将硅（**Silicon**）明确纳入高影响材料管理范围，覆盖石英/石英岩、工业硅（金属硅）、多晶硅、硅锭及硅片等相关硅基原材料和关键加工环节。高景重点关注上述矿产和材料在来源合法性、环境管理、能源与水资源使用、污染防治、职业健康安全、人权与劳工权益、社区影响、商业道德及供应链可追溯性等方面的实际或潜在风险。

受冲突影响和高风险区域包括联合国安全理事会决议指定的受冲突影响地区、欧盟界定的受冲突影响和高风险地区、美国《多德-弗兰克华尔街改革和消费者保护法》（**Dodd-Frank Act**）涉及的相关区域，以及依据 OECD《受冲突影响和高风险区域矿产负责任供应链尽职调查指南》识别的其他高风险区域。

For the purposes of this policy, "responsible minerals" refer to minerals, mineral substances, and their derivative materials involved in Gokin's products, production operations, and supply chain, including but not limited to gold, tungsten, tantalum, tin, silicon, cobalt, mica, and other minerals originating from Conflict-Affected and High-Risk Areas (CAHRAs), as well as High-impact Materials that pose significant risks in terms of environment, society, human rights, labour, community, business ethics, or traceability. Gokin explicitly includes silicon within the scope of High-impact Materials management, covering related silicon-based raw materials and key processing stages such as quartz/quartzite, industrial silicon (metallic silicon), polysilicon, silicon ingots, and silicon wafers. Gokin places particular emphasis on the actual or potential risks associated with the above minerals and materials in terms of source legitimacy, environmental management, energy and water use, pollution prevention, occupational health and safety, human rights and labour rights, community impact, business ethics, and supply chain traceability.

Conflict-Affected and High-Risk Areas include regions identified as conflict-affected by United Nations Security Council resolutions, regions defined as conflict-affected and high-risk by the European Union, regions covered by the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), and other high-risk areas identified in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

3. 承诺

3. Commitments

高景承诺遵守国内外适用的法律法规，并参考联合国全球契约、美国《多德-弗兰克华尔街改革和消费者保护法案》第 1502 条、《欧盟冲突矿产条例》、经济合作与发展组织（OECD）《受冲突影响和高风险区域矿产负责任供应链尽职调查指南》、负责任矿产倡议（RMI）、中国五矿化工进出口商会（CCCMC）《中国负责任矿产供应链尽责管理指南》，以及 Solar Stewardship Initiative（SSI）ESG 标准和供应链可追溯性标准等原则与框架。高景对冲突矿产实施负责任采购，并承诺：

1) 不直接或间接采购、使用或销售为非国家武装团体提供资金或其他支持，或与非法控制、武装冲突及严重违法活动相关的矿产和材料；

- 2) 杜绝严重侵犯人权行为，包括酷刑、不人道或有辱人格的待遇、强迫劳动、最恶劣形式的童工劳动及大规模性暴力等行为；
- 3) 不直接或间接为非国家武装团体、非法公共或私人安全力量提供支持；
- 4) 杜绝任何的贿赂和腐败行为；
- 5) 不参与洗钱或虚假申报税款费用和特许权使用费方面的虚假陈述或弄虚作假行为；
- 6) 对来自受冲突影响和高风险区域的矿产开展强化尽职调查；对无法在合理期限内有效预防或缓解的高风险，采取暂停采购、推动整改或终止合作等措施；
- 7) 对高影响材料（**High-impact Materials**）实施专项风险管理，并将硅（**Silicon**）作为重点材料，推动从石英/石英岩、工业硅（金属硅）、多晶硅、硅锭到硅片等关键供应链环节的来源透明、信息可核验和材料可追溯，持续识别和缓解相关环境、职业健康安全、人权、劳工权益、社区及商业道德风险；

Gokin commits to complying with applicable domestic and international laws and regulations, and references the principles and frameworks of the United Nations Global Compact, Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, the EU Conflict Minerals Regulation, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Responsible Minerals Initiative (RMI), the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCME) Due Diligence Guidelines for Responsible Mineral Supply Chains, and the Solar Stewardship Initiative (SSI) ESG Standard and Supply Chain Traceability Standard. Gokin implements responsible sourcing of conflict minerals and commits to the following:

1. Not directly or indirectly procure, use, or sell minerals and materials that provide financing or other support to non-state armed groups, or that are associated with illegal control, armed conflict, or serious illegal activities;
2. Eliminate serious human rights abuses, including torture, inhuman or degrading treatment, forced labour, the worst forms of child labour, and mass sexual violence;
3. Not directly or indirectly provide support to non-state armed groups, or to illegal public or private security forces;
4. Eliminate all forms of bribery and corruption;
5. Not engage in money laundering, or in misrepresentation or falsification regarding tax payments, fees, and royalties;
6. Conduct enhanced due diligence on minerals originating from Conflict-Affected and High-Risk Areas; where high risks cannot be effectively prevented or mitigated within a reasonable period, take measures such as suspending procurement, promoting corrective actions, or terminating cooperation;

7. Implement dedicated risk management for High-impact Materials, with silicon as a priority material, promoting source transparency, verifiable information, and material traceability across key supply chain stages from quartz/quartzite, industrial silicon (metallic silicon), polysilicon, silicon ingots, to silicon wafers, and continuously identifying and mitigating relevant environmental, occupational health and safety, human rights, labour rights, community, and business ethics risks.

4. 管理机制

4. Management Mechanism

高景已建立负责任矿产管理机制，主要包括：

4.1 尽职调查：定期对矿产及高影响材料供应链开展基于风险的尽职调查，包括供应商身份核验（KYC）、受冲突影响和高风险区域识别、原产地和供应链路径调查、风险评估、整改跟踪、独立验证及必要的信息披露，以识别和评估供应链中的人权、环境、商业道德及可追溯性风险。

4.2 供应商管理：要求适用供应商签署《供应商社会责任承诺书》，配合提供矿产来源及供应链信息，不得采购、使用或销售与武装冲突、严重人权侵害或重大违法行为相关的矿产和材料，并应对识别出的风险及时采取整改和缓解措施。

4.3 高影响材料及硅供应链管理：将硅作为重点管理材料，推动供应商提供从石英/石英岩、工业硅（金属硅）、多晶硅、硅锭到硅片等关键环节的来源、加工和流转信息，审查其在环境、职业健康安全、劳工权益等方面的合规表现，对高风险供应商制定整改计划并跟踪验证。

4.4 培训与教育：定期对供应链、品质、合规及可持续发展等相关员工开展培训，提高其对负责任矿产、受冲突影响和高风险区域、高影响材料及硅供应链风险的认识和管理能力。

4.5 持续改进：定期审查和改进负责任矿产管理机制，结合适用法律法规、国际标准、行业倡议、供应链风险及利益相关方反馈，持续提升包括硅在内的高影响材料尽职调查与可追溯性管理水平。

Gokin has established a responsible mineral management mechanism, which primarily includes the following:

4.1 Due Diligence

Conduct risk-based due diligence on the supply chains of minerals and High-impact Materials on a regular basis, including supplier identity verification (Know Your Counterparty, KYC), identification of Conflict-Affected and High-Risk Areas, investigation of origin and supply chain routes, risk assessment, corrective action tracking, independent verification, and necessary disclosure, so as to identify and assess human rights, environmental, business ethics, and traceability risks in the supply chain.

4.2 Supplier Management

Require applicable suppliers to sign the Supplier Social Responsibility Commitment Letter, cooperate in providing mineral source and supply chain information, refrain from procuring,

using, or selling minerals and materials associated with armed conflict, serious human rights violations, or major illegal activities, and take timely corrective and mitigating measures against identified risks.

4.3 High-impact Materials and Silicon Supply Chain Management

Treat silicon as a priority material, and require suppliers to provide information on the source, processing, and flow of materials across key stages from quartz/quartzite, industrial silicon (metallic silicon), polysilicon, silicon ingots, to silicon wafers. Review their compliance performance in terms of environment, occupational health and safety, and labour rights, and formulate corrective action plans for high-risk suppliers with follow-up verification.

4.4 Training and Education

Provide regular training to employees in supply chain, quality, compliance, sustainability, and other relevant functions, to enhance their awareness and management capabilities regarding responsible minerals, Conflict-Affected and High-Risk Areas, High-impact Materials, and risks in the silicon supply chain.

4.5 Continuous Improvement

Regularly review and improve the responsible mineral management mechanism, taking into account applicable laws and regulations, international standards, industry initiatives, supply chain risks, and stakeholder feedback, so as to continuously enhance the due diligence and traceability management level for High-impact Materials, including silicon.

5. 违规处理

5. Violation Handling

如发现供应商及其他利益相关方在同高景的合作中违反本政策，高景将立即采取措施，包括但不限于暂停合作、解除合同并要求其赔偿经济及声誉等相关损失。

If Gokin identifies that any supplier or other stakeholder has violated this policy in their cooperation with Gokin, Gokin will take immediate measures, including but not limited to suspending cooperation, terminating the contract, and demanding compensation for related losses, including economic and reputational damages.

6. 政策审阅及修订

6. Policy Review and Revision

本政策及相关承诺的发布已获得本公司高级管理层的认可，高景至少每年对本政策进行一次正式审阅，根据法律法规、国际标准、客户要求及公司内部政策变化进行修订，确保时效性。

本政策发布于高景公司官网供各利益相关方查阅，政策的落实情况及相关关键绩效指标将每年在公司可持续发展报告中披露。

The release of this policy and related commitments has been approved by the company's senior management. Gokin shall conduct a formal review of this policy at least once a year and revise it

in accordance with changes in laws and regulations, international standards, customer requirements, and internal company policies to ensure its timeliness.

This policy is published on Gokin's official website for access by all stakeholders. The implementation status of this policy and relevant key performance indicators will be disclosed annually in the company's sustainability report.

7. 申诉与报告机制

7.Grievance and Reporting Mechanism

高景建立便捷、保密的沟通与申诉渠道。公司员工、供应商、合作伙伴、客户及其他利益相关者，可通过以下渠道匿名或公开向合规部门或监管部门申诉、报告矿产供应链相关风险担忧：

- ◆ 合规举报邮箱：shenjibu@gokinsolar.com
- ◆ 合规服务热线：+86-15692038078
- ◆ 书面投诉地址：中国广东省珠海市金湾区三灶镇湖滨路 1566 号【高景审计委员会】

高景承诺将依据法律法规，对举报案件开展客观调查、公正处理，并及时向举报人反馈处理结果；同时，严格保护申诉人、报告人的合法权益，杜绝其因申诉或报告行为遭受威胁、恐吓、骚扰或其他形式的不公平待遇。

我们期待与所有合作伙伴携手，共同推动全球矿产供应链可持续发展，实现负责任矿产采购的整体目标！

Gokin has established convenient and confidential communication and grievance channels. Employees, suppliers, partners, customers, and other stakeholders may submit grievances or report concerns regarding risks in the mineral supply chain, anonymously or openly, to the Compliance Department or supervisory authorities through the following channels:

- ◆ Compliance Reporting Email: shenjibu@gokinsolar.com
- ◆ Compliance Service Hotline: +86-15692038078
- ◆ Written Submission Address: No. 1566, Hubin Road, Sanzao Town, Jinwan District, Zhuhai, Guangdong Province, China [Attention: Gokin Audit Committee]

Gokin commits to conducting objective investigations and fair handling of reported cases in accordance with laws and regulations, and to providing timely feedback on the handling results to the reporters. At the same time, Gokin will strictly protect the legitimate rights and interests of complainants and reporters, and prevent them from suffering threats, intimidation, harassment, or other forms of unfair treatment as a result of their grievance or reporting actions.

We look forward to working hand in hand with all partners to jointly promote the sustainable development of the global mineral supply chain and achieve the overall goal of responsible mineral sourcing!