TONGWEI CO., LTD.

Responsible Supply Chain Due Diligence Management Report

Foreword

To ensure that the Company avoids risks that may fuel conflict, cause serious human rights violations, or result from serious negligence within the mineral supply chains associated with the raw materials it may use, the Company has established a standardised management system and applies a supply chain due diligence methodology to identify and assess supplier risk. This ensures that the Company's operations are consistent with the UN Global Compact, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains, and other applicable international conventions and standards.

Prepared in accordance with the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, this report summarises the due diligence activities carried out by the photovoltaic manufacturing segment of Tongwei Co., Ltd. during the period from 1 January 2025 to 31 December 2025.

1. Management Policy

1.1 Management of risks of serious human rights abuses associated with mineral extraction, transport or trade

(a) When conducting procurement or business activities in conflict-affected and high-risk areas, the Company will not tolerate, and will not in any way profit from, assist, facilitate or contribute to, any party engaging in:

i) any form of torture, or cruel, inhuman or degrading treatment;

ii) any form of forced or compulsory labour — that is, any work or service extracted from a person under the menace of a penalty and for which that person has not offered themselves voluntarily;
iii) the worst forms of child labour — that is, any act in violation of the International Labour Organization's Convention Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (No. 182);
iv) other serious human rights violations and abuses, such as widespread sexual violence;
v) war crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.
(b) Where the Company has reasonable grounds and evidence to believe that such a risk exists within its supply chain — that is, that an upstream supplier is sourcing from, or is associated with, a party engaged in the serious abuses described in Section 1 — the Company will immediately suspend or terminate its cooperation with that supplier.

1.2 Management of risks of direct or indirect support to non-state armed groups

(a) The Company will not tolerate any direct or indirect support provided to non-state armed groups through the extraction, transport, trading, processing or export of minerals, including but not limited to purchasing minerals from non-state armed groups or their affiliates, making payments to them, or otherwise providing them with logistical support, equipment or other assistance. Zero-tolerance conduct with respect to armed groups or their affiliates includes:
i) illegally controlling mine sites, or otherwise controlling transport routes, mineral trading points, or other upstream actors in the supply chain;
ii) illegally levying taxes or extorting money or minerals at mine entrances, along transport routes, or at mineral trading points;
iii) illegally taxing or extorting intermediaries, exporters or international traders.
(b) Where the Company has grounds and evidence to believe that an upstream supplier is sourcing from, or has a relationship with, any party providing direct or indirect support to a non-state armed group (as defined in the preceding paragraph), the Company will immediately suspend or terminate its cooperation with that supplier.

1.3 Management of risks relating to public or private security forces

(a) The Company will not provide direct or indirect support to public or private security forces that engage in the following conduct:
i) illegally controlling mine sites, or otherwise controlling transport routes, mineral trading points, or other upstream actors in the supply chain;
ii) illegally levying taxes or extorting money or minerals at mine entrances, along transport routes, or at mineral trading points;
iii) illegally taxing or extorting intermediaries, exporters or international traders.

(b) The Company considers that the legitimate role of public or private security forces in and around mine sites and along transport routes is limited to: upholding the rule of law, including safeguarding human rights, protecting miners, equipment and facilities, and protecting mine sites and transport routes so that legitimate extraction and trade may proceed without interference.

(c) The Company will work proactively with local governments, civil society organisations and other relevant parties to encourage public or private security forces within the supply chain to act lawfully and appropriately, so as to minimise their negative impact on local communities.

(d) Where the Company has reasonable grounds and evidence to believe that such a risk exists within its supply chain, it will work with the supplier concerned to reduce the impact of that risk.

1.4 Management of money-laundering and bribery risks associated with mineral extraction, transport or trade

(a) The Company prohibits bribery of any kind at any stage, and opposes money laundering in any form.

(b) Where the Company has reasonable grounds and evidence to believe that such a risk exists within its supply chain, it will work with the supplier concerned to reduce the impact of that risk.

2. Management System Development

2.1 Internal governance structure

(a) The Company has publicly issued a conflict minerals policy and confirmed the relevant responsibilities of internal personnel.

(b) The Company has established a supply chain due diligence governance structure led by the Global Supply Chain Centre at Group headquarters and coordinated in tandem with its business segments, forming a closed-loop management structure spanning headquarters-level coordination, segment-level collaboration, and grassroots-level implementation.

(c) The Company strictly complies with the Company Law of the People's Republic of China, the Bid Invitation and Bidding Law of the People's Republic of China, and other applicable laws and regulations, and, in light of its own business requirements, has developed comprehensive supplier management systems, including the Tongwei Procurement Management System and the Tongwei Supplier Management Measures, among other specialised management systems and policies, to continuously improve the standardisation and efficiency of end-to-end supplier management.

(d) The Tongwei Supplier Management Measures and other internal policies set out clear admission procedures for qualified suppliers, and the Company rigorously controls supplier quality. The Company has systematically upgraded its supplier admission management approach, refined the admission qualification criteria across categories of material suppliers, and revised the ESG on-site audit requirements applicable to new suppliers. The Company has also published its supplier admission requirements on its website, ensuring that the entire process is open, standardised and transparent.

(e) The Tongwei Supplier Management Measures explicitly incorporate sustainability considerations into both the admission review of new suppliers and the annual evaluation of qualified suppliers, strengthening performance management of suppliers in relation to business ethics, human rights and labour, environmental protection, and occupational health and safety. The signing rate among the Company's major raw material suppliers for the Supplier Social Responsibility Commitment Letter, the Supplier Compliance Commitment Letter, and the Supplier Code of Conduct has reached 100% in each case.

(f) The Company has established a comprehensive conflict minerals management mechanism, requiring suppliers to sign the Tongwei Supplier Conflict Minerals Declaration and Commitment upon admission, and incorporating conflict minerals and disputed sourcing considerations into the Supplier ESG Audit Form. In addition, the Company requires Tier 1 suppliers not only to ensure that they themselves are not engaged in disputed sourcing, but also to cascade responsible mineral sourcing principles to their own upstream suppliers, so as to promote compliance management across the whole supply chain. The signing rate for the Tongwei Supplier Conflict Minerals Declaration and Commitment among relevant suppliers has reached 100%. Screening confirmed that none of the Company's partner suppliers are involved in conflict minerals.

2.2 Traceability system development

(a) While strictly complying with applicable Chinese laws and regulations, the Company actively supports the Universal Declaration of Human Rights and upholds the UN Guiding Principles on Business and Human Rights. The Company continually strengthens its traceability management mechanisms and, through targeted capacity-building training, supports external suppliers in improving their own traceability capability, helping to enhance traceability and information transparency across the entire value chain.

(b) The Company has established an Internal Supply Chain Traceability Management Mechanism, organised traceability training covering all product categories, and integrated efficient processes, systems and hardware to strengthen the digitalisation and capability of its traceability management, ensuring the efficient operation of a complete traceability chain from silica ore, industrial silicon, polysilicon and silicon ingots/wafers through to cells and modules.

(c) The Company has end-to-end traceability capability from module back to silica ore, and has passed traceability audits conducted by independent third parties — STS Senergy Technical Services and TÜV Rheinland — at the first attempt. On the strength of its outstanding traceability management system and advanced digital systems, the Company became the first enterprise to pass a TÜV Rheinland audit at the first attempt and to achieve an overall rating of Grade A or above across the entire photovoltaic supply chain.

2.3 Business conduct compliance governance

(a) The Company has embedded integrity and compliance principles into its procurement practices, requiring all suppliers and business partners with which it has commercial dealings to sign compliance commitment letters covering commercial bribery, money laundering, fair competition and related matters, and requiring them to participate in training on business ethics and anti-corruption/anti-bribery, so as to ensure that suppliers genuinely fulfil their business ethics obligations. The signing rate among the Company's major raw material suppliers for compliance commitment letters and integrity commitment letters currently stands at 100% in each case.

(b) The Company requires its procurement team to sign an Integrity Pledge, and has organised company-wide compliance procurement training for the procurement team, covering commercial bribery and unfair competition, procurement and supply chain risk and compliance management, and supervisory/regulatory knowledge, thereby strengthening the team's risk-prevention awareness and working with suppliers to build a transparent supply chain ecosystem.

(c) All related payments and receipts are made through the Company's bank accounts, with no cash transactions. These payments and receipts are subject to oversight by banks and national fiscal and taxation authorities, and are audited annually.

(d) The Company reviews the shipping documents, weight documents, inspection reports, invoices, transfer records and other documentation for each batch of goods received, and investigates any transaction where the underlying background appears inconsistent, or is suspected in any way of being inconsistent.

2.4 Communication and grievance mechanisms

(a) The Company has established a sound whistleblowing and complaints mechanism, with open internal and external reporting channels, and encourages all employees and external stakeholders to report any actual or suspected misconduct relating to the Company, including anonymous reports. All reports of misconduct are investigated by the receiving department, with corrective action taken based on the findings of that investigation.

(b) In accordance with the Tongwei Group Supervision Regulations and other applicable internal policies, the Company protects the personal information of every whistleblower in accordance with the law. Neither the Company nor its employees may discriminate against, retaliate against, or otherwise harm a whistleblower. Any harassment, discrimination, retaliation or harm directed at a whistleblower will be treated as serious misconduct, and the Company reserves the right to take appropriate action against those responsible. Anyone who believes they have suffered retaliation may report the matter immediately and provide supporting evidence.

(c) Main complaint channels:

Telephone: (028) 86168834, (028) 86168838

Mobile: 15608175053 (also a WeChat number)

QQ: 2461011915

Email: jcb@tongwei.com

Postal address: Supervision Department, Tongwei International Centre, No. 588 Middle Section of Tianfu Avenue, Chengdu, Sichuan Province

On-site channel: Suggestion and complaint box

2.5 Record-keeping

(a) All supplier-related documentation — including due diligence files, risk assessment forms, compliance documents, contracts, inspection records, and goods-in/goods-out records — is retained on a long-term basis.

3. Risk Identification and Assessment

3.1 ESG risk identification and assessment

(a) The Company has established an ESG risk management system that spans the entire supplier lifecycle. Both the admission review of new suppliers and the annual review of qualified suppliers include ESG audit mechanisms covering key topics such as environmental management, labour rights, and business ethics, with a one-vote veto applied to any supplier that breaches a zero-tolerance clause.

(b) The Company uses a "Supplier Scorecard" to evaluate suppliers, with scoring dimensions covering labour rights, business ethics, environmental management, and other areas. All else being equal, higher-scoring suppliers are given priority for shortlisting. As at the end of 2025, the Company had achieved 100% coverage of ESG risk identification and assessment among its major raw material suppliers.

3.2 Conflict minerals risk identification and assessment

(a) The Company periodically assesses the activities of all upstream suppliers, requiring metal material suppliers to complete a Sustainable Supply Chain Due Diligence Questionnaire in order to determine the scope of mineral supply chain risk, including the type of mineral involved, its principal country/region of origin, and smelter location.

(b) The Company has established a procedure for identifying conflict-affected and high-risk areas (CAHRAs). The CAHRA list is updated on a quarterly basis, drawing on the following sources:

i) the Heidelberg "Conflict Barometer";

ii) the Dodd-Frank Act;

iii) the EU list of conflict-affected and high-risk areas (CAHRAs);

iv) the Corruption Perceptions Index;

v) the UN Human Development Index.

(c) The Company refers to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains to identify raw material and mineral-related risks and to match them with the appropriate type of mitigation measure.

(d) Risk-scoring methodology: the Company applies a risk-matrix approach, determining an overall risk rating (very high / high / medium / low) as the product of "likelihood" (high/medium/low) and "severity of impact" (high/medium/low).

(e) Likelihood is assessed based on factors such as historical incidence and World Bank governance indicators for the supplier's country. Severity of impact is assessed based on factors such as OECD zero-tolerance conduct (automatically rated “high” severity), circumstances that could give rise to human rights abuses or legal liability (rated “medium”), and minor procedural non-compliance (rated “low”).

(f) 2025 CAHRA assessment coverage: the Company completed a CAHRA-area association assessment covering all active suppliers, achieving 100% coverage. The assessment found that none of the Company's suppliers are associated with conflict-affected or high-risk areas; the supporting assessment basis and records have been archived for inspection.

(g) Red-flag management: the Company has established a red-flag identification and three-tier verification mechanism, focusing on abnormal conduct such as a supplier's refusal to disclose smelter names, a mineral source country being listed as a CAHRA without a declared control measure, or prices that deviate significantly from market levels. In 2025, zero red flags were identified. All flags are logged in a dedicated system and retained for no less than ten years.

3.3 Risk reporting

(a) The Company's supply chain function reports supply chain risk to senior management on a regular basis, and senior management is accountable for supply chain risk matters.

(b) The Company has provided its supply chain team with specialised training on the OECD Guidance and on sustainable supply chains. In 2025, training coverage reached 100%, with training records archived for inspection.

4. Risk Management and Mitigation

4.1 Full-lifecycle ESG risk management

(a) Where non-conformities are identified in a supplier's ESG risk assessment, the Company requires the supplier to submit a detailed corrective action plan and supporting evidence within seven working days, and has established an end-to-end tracking mechanism to ensure that corrective actions are closed out.

(b) Where a supplier fails its ESG audit, the Company requires it to provide, within three months, corrective measures and supporting evidence addressing the non-conformities identified, with the case then closed out through the Company's systems.

4.2 Conflict minerals risk mitigation

(a) Having understood the actual and potential risks relating to conflict minerals, the Company reviews its supply chain to determine whether the identified risk can be reduced by maintaining, temporarily suspending, or discontinuing the relationship with the supplier concerned.

(b) For risks that do not require the supplier relationship to be discontinued, the Company develops a risk mitigation plan appropriate to the risk classification and works with the supplier to reduce the risk. Mitigation plans are developed in consultation with the supplier and affected stakeholders, ensuring that affected stakeholders are given sufficient time to comment on the risk assessment, and that any issues, concerns, or other suggestions relating to risk management are duly considered and responded to.

(c) Risk mitigation response timeframe: where a supplier is found to present a risk of the kind identified in the OECD Guidance, the supplier must submit a corrective action plan within seven working days, followed by corrective measures and other supporting evidence addressing the non-conformities; non-conformities must be closed out within three months.

(d) Decision criteria: (i) Continued cooperation — applied where the supplier completes corrective action within the agreed timeframe, all quantitative indicators are met, and the Company confirms upon review that the risk has been eliminated; (ii) Termination of cooperation — applied where the supplier refuses to cooperate with corrective action, or where OECD zero-tolerance conduct occurs (such as the use of child labour, forced labour, or support for non-state armed groups), in which case a one-vote veto applies, barring admission or further cooperation unless and until the corrective action has been assessed and approved.

(e) Record of stakeholder engagement: in 2025, the Company consulted suppliers and relevant stakeholders on its supply chain risk mitigation plans.

4.3 Performance monitoring and review

(a) The Company monitors supplier sustainability performance through its dual-track EHS and ESG tracking system, combined with supplier self-assessment reports and on-site audits, providing targeted recommendations for improvement and requiring suppliers to complete corrective action within set timeframes, thereby systematically strengthening the sustainability capability of its supply chain.

(b) The Company periodically conducts conflict minerals research and cross-validates the findings against audit results, strengthening responsible supply chain management.

(c) The Company periodically reviews the operation of its due diligence management system, summarising findings and identifying gaps and improvement measures.

5. Risk Audit

5.1 Internal audit

(a) The Company conducts an annual audit of its qualified suppliers, verifying the maturity and effectiveness of suppliers' risk management systems.

(b) The Company periodically conducts on-site supplier audits; suppliers with strong ESG performance are upgraded in supplier tier, given priority for procurement, and recognised or otherwise incentivised.

5.2 External audit

The Company's due diligence system has undergone a third-party supply chain due diligence audit conducted by TÜV SÜD Certification and Testing (China) Co., Ltd.

The audit confirmed that the Company has established a reasonably robust supply chain due diligence system that operates effectively overall and is consistent with the requirements of international frameworks.

6. Public Reporting

The Company publishes an annual report on the operation of its due diligence management system. This is the Company's first such report.

(a) This report has been prepared in accordance with the five-step framework set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

It covers the due diligence activities of the photovoltaic manufacturing segment of Tongwei Co., Ltd. during the period from 1 January 2025 to 31 December 2025, including 3TG conflict minerals as well as quartz, silicon and other key materials in the solar supply chain.

(b) Publication and update mechanism: this report is published in the first half of each year and covers the preceding calendar year. Prior to formal publication, the report is approved by the Company's supply chain leadership; once published, it is made available on the Company's official website, with the external version identical to the internally approved version.

(c) Alignment with other ESG disclosures: this report forms an integral part of the Company's annual ESG/sustainability report, with the underlying due diligence data also incorporated into the Company's ESG report disclosures to ensure consistency of information.

(d) Stakeholder feedback mechanism: the Company welcomes comments on this report from investors, customers, NGOs, and wider society. Substantive feedback received will be addressed in the following year's report.

(e) Continuous improvement: as this is the first annual report, the Company will, in its 2026 report, include the outcomes of supplier capacity-building initiatives together with the implementation status of related audit improvement recommendations.

For other due diligence-related commitment documents, please refer to the relevant page on the Company's official website (https://www.tongwei.cn/download.html?typeid=18).

Tongwei Co., Ltd.
April 2026

Appendix: Conflict Minerals Due Diligence Results

	Quartz ore	Metallurgical-grade silicon	Polysilicon	Silicon rod	Wafer	Cell	Metal auxiliary materials
Number investigated (PV manufacturing segment total)	4	2	6	1	2	5	16
Investigation result (PV manufacturing segment total)	No risk	No risk	No risk	No risk	No risk	No risk	No risk
Number investigated (Nantong site)	4	2	6	1	2	5	10
Investigation result (Nantong site)	No risk	No risk	No risk	No risk	No risk	No risk	No risk
Number investigated (Inner Mongolia site)	4	2	6	1	2	5	16
Investigation result (Inner Mongolia site)	No risk	No risk	No risk	No risk	No risk	No risk	No risk
Number investigated (Yancheng site)	4	2	6	1	2	5	10
Investigation result (Yancheng site)	No risk	No risk	No risk	No risk	No risk	No risk	No risk
Basis for investigation	Heidelberg “Conflict Barometer”; EU CAHRAs list; Dodd-Frank Act; Corruption Perceptions Index; UN Human Development Index (HDI)						

Notes

1 Worst Forms of Child Labour Convention, 1999 (No. 182), https://www.ohchr.org/en/instruments-mechanisms/instruments/worst-forms-child-labour-convention-1999-no-182

2 The Conflict Barometer 2023, https://hiik.de/conflict-barometer/current-version/?lang=en/

3 Dodd-Frank Act, https://www.cftc.gov/sites/default/files/idc/groups/public/@swaps/documents/file/hr4173_enrolledbill.pdf

4 List of Conflict-Affected and High-Risk Areas (CAHRAs) (as defined under Regulation 2017/821), https://www.cahraslist.net/

5 Corruption Perceptions Index, https://www.transparency.org/en/cpi/2024

6 Human Development Index (HDI), https://hdr.undp.org/data-center/human-development-index#/indicies/HDI

7 OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_9789264252479-en.html

8 Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains, https://img06.mysteelcdn.com/wz/uploaded/steel/2022/07/27/144606.pdf