



Tongwei Co., Ltd.

Supplier Code of Conduct

Tongwei Co., Ltd (hereinafter referred to as "Tongwei" or the "Company") is committed to upholding both commercial value and social responsibility, and is dedicated to conducting business with higher ethical standards. For the purpose of actively identifying and assessing the environmental and social risks on the supply chain, Tongwei hereby provides the Code of Conduct for Suppliers and gives priority to the suppliers observing the Code of Conduct. The Company is committed to incorporating environmental and social factors into its supplier management mechanism in an orderly manner, and strengthening the performance management of its suppliers in the areas of business ethics, human rights, labor management, environmental protection, occupational safety and health. With the philosophy of “honesty, trust, fairness, and excellence”, Tongwei requires suppliers to observe all applicable laws and regulations at the business locations and support them to constantly reinforce management on sustainable development of the supply chain for creating a workplace with dignity and moral integrity. In order to fulfill social responsibilities and commitments on supply chain management, suppliers and partners of Tongwei shall conduct business activities by the following principles:

Business Ethics

- Suppliers shall ensure that their operations, products and services comply with relevant national laws and regulations.
- No supplier shall transfer, re-contract or subcontract any right and obligation to any third party without the prior written consent of Tongwei. Where necessary, suppliers shall timely and completely inform Tongwei of any business contact with any other supplier, subcontractor or subordinate partner.
- Corruption, extortion, fraud, bribery and any other violation of business ethics are prohibited while providing products and services to Tongwei.

- Suppliers shall develop policies and take measures to avoid any conflict of interest or relevant misconduct, align internal interests with employees, specify the boundaries of employees' responsibilities, and strengthen supervision on the execution of duties.
- Suppliers shall uphold "fairness, transparency and honesty" in the process of competition and cooperation, resisting any false information or fraud for competitive advantage and prohibiting any commercial competition that may cause severe damage to society.
- Suppliers shall hold and utilize trade secrets, trademarks, patents, copyrights and other intellectual property without any infringement upon any intellectual property right or any damage to the reputation of the Company.
- Suppliers must ensure their business operations comply with all applicable anti-money laundering and counter-terrorist financing laws and regulations, and must not directly or indirectly participate in any form of money laundering, terrorist financing, or other illegal financial activities.
- Suppliers must comply with applicable trade controls, import and export controls, and other relevant laws, regulations, industry standards, business regulatory requirements, ordinances, and practices in their place of registration and countries and regions of operation.
- Before collaborating, Tongwei and its suppliers sign the *Supplier Guidelines*, *Supplier Compliance Commitment*, *Supplier Social Responsibility Commitment*, and *Tongwei Supplier Conflict Minerals Commitment and Declaration*, and accept reports through public hotlines (028-86188838/028-86188834) and email (jcb@tongwei.com). At the same time, suppliers must establish their own comprehensive reporting system and informer protection mechanism to jointly supervise and maintain a positive Business Ethics atmosphere with Tongwei.

Privacy and Information Protection

- Any information acquired by suppliers through business contact with Tongwei, including but not limited to information about the business, operations, and policies of the Company, shall be deemed as confidential, sensitive, and proprietary information, which is forbidden to be disclosed to any third party, the public, or media unless authorized by Tongwei or required by laws and regulations.
- Suppliers shall commit to protecting the personal privacy of all business-related personnel, including customers, consumers, and employees. Suppliers shall comply with the laws and regulations on privacy and information security in collecting, storing, processing, transmitting, and sharing personal information.

- Tongwei encourages suppliers to enhance information security capabilities and increase employees' awareness of information security to minimize any jeopardies thereto and strengthen resilience to risks for the supply chain.

Human Rights and Labor

- Suppliers shall strictly comply with local laws and regulations on labor and human rights, and abide by the principles of basic labor rights under the core conventions of the International Labor Organization (ILO). Suppliers are encouraged to conduct compliance traceability to their labor conditions and establish a labor supervision and constraint system for the supply chain to ensure all supply chain suppliers meet the same requirements.
- Suppliers are prohibited from any form of child labor, including any person under the minimum legal working age.
- Suppliers shall eliminate any forced labor or slave labor and comply with regulations on working hours.
- Suppliers shall ensure that employees' salaries are paid on time at least for basic needs or at minimum legal standard while providing sufficient care and benefit to employees.
- Suppliers shall follow applicable laws and regulations with respect to working hours and compensate workers for overtime hours in accordance with legal requirements. All overtime shall be voluntary.
- Suppliers shall provide employees with respect and equal treatment, and must not discriminate based on ethnicity, race, nationality, gender, religious belief, physical disability, or other factors.
- Suppliers shall provide employees with an inclusive workplace without harassment and discrimination and strengthen their sense of gain, happiness and security.
- Suppliers shall respect and uphold the employees' right to express their demands and liberty of association and collective bargaining.
- Suppliers shall respect the freedom of employees in choosing jobs and shall neither retaliate against employees terminating labor contracts nor withhold identity cards, passports and other documents of employees.

Occupational Health and Safety¹

- Suppliers shall provide employees with a safe and healthy workplace, establish a complete occupational health and safety management system with regular recognition of hazardous sources in workplace, and standardize safety operations to eliminate working hazards.
- Suppliers shall have the capability to respond to sudden natural disasters, safety production accidents, and environmental pollution events, and conduct regular emergency drills to reinforce response to real emergencies.
- Suppliers shall provide employees with training on occupational health and safety and regular physical check-up to fully protect their rights and interests at workplace.

Environmental Management²

- Suppliers are required to observe the environmental laws and regulations at the business location and to acquire, maintain and update all necessary environmental impact assessment reports, environmental permits (e.g., sewage discharge permit), and related approval documents.
- Suppliers shall not cause any environmental pollution in product manufacturing or service provision, discharge and dispose of pollutants by state laws and regulations or local policies, avoid using hazardous materials, and reduce the consumption of harmful substances to radically minimize or eliminate pollution factors or hidden risks on environmental protection. Tongwei also encourages suppliers in waste recycling to promote the mode and philosophy of circular economy.
- Suppliers shall develop a sense of sustainability in technological reform on energy conservation and carbon emission reduction, minimize repetitive and excessive packaging, practice green and low-carbon operations and engage carbon reduction in their supply chains.
- Suppliers shall try to avoid any damage to the local ecological environment and biodiversity in the place where they operate, and assess ecological impact before carrying out business activities. Suppliers are also encouraged to fulfill the obligations on environmental protection and ecological restoration to eliminate factors or risks of environmental pollution.

¹ For more details on occupational health and safety policies for suppliers, please refer to *Tongwei Co., Ltd. Occupational Health and Safety Commitment and Policy*.

² For more details on the policies on environmental management and ecological environmental protection, please refer to *Tongwei Co., Ltd. Environmental Management Commitment and Policy, Biological Diversity Conservation Commitment and Policy, and Forest Protection Commitment and Policy*.

Responsible Mineral Sourcing Management³

- No supplier is allowed in any way to gain profit from, provide support to or assist any party to violate human rights and humanitarianism during business operations at conflicted affected and high-risk areas (CAHRAs).
- Suppliers shall strictly adhere to international conventions such as the OECD *Due Diligence Guidelines for Responsible Supply Chains of Minerals in Conflict-Affected and High-Risk Areas* and the Responsible Minerals Initiative (RMI). They shall actively conduct responsible minerals investigations to ensure they are not involved in controversial procurement and do not use mineral resources from conflict regions or that violate Tongwei's policies (e.g., tantalum, tin, tungsten, gold (3TG), cobalt, mica, etc.). Furthermore, suppliers are required to pass this principle on to their upstream suppliers.

Community Engagement

- Suppliers shall maintain close and friendly communication and cooperation with local communities and respect local culture, traditions, and beliefs as well as the informed consent right of communities and residents.
- Suppliers are encouraged to participate in community development with more contributions, thus promoting social and economic growth with sustainability.



CEO: Liu Shuqi

Tongwei Co., Ltd.

Date: March 2026

Remarks:

- 1.The company encourages and supports suppliers and partners to adopt and implement additional principles and policies, provided that they do not conflict with this policy.
- 2.The company's business operations strictly comply with the local laws and regulations. In the absence of specific local legal requirements, this policy shall be followed.

³ For more details on supplier responsible mineral sourcing management policies, please refer to the *Tongwei Co., Ltd. Responsible Mineral Sourcing Management Commitment and Policy*.

3. This document is interpreted and revised by Tongwei Co., Ltd. The company will update the document in a timely manner based on domestic and international policies, regulatory requirements, and industry developments. In the event of any inconsistencies between the Chinese and English versions of this document, the Chinese version shall prevail.