Tongwei Co., Ltd.
Environmental, Social and Governance (ESG) Management Policy

Purpose

To comprehensively regulate the environmental, social, and corporate governance (hereinafter referred to as "ESG") management of Tongwei Co., Ltd. (hereinafter referred to as "the Company"), integrate the Company’s sustainable development strategy into its daily operations and management, and ensure the effective operation of its ESG management system, the Company has formulated this management policy in accordance with relevant laws, regulations, standards, and normative documents, such as the United Nations Sustainable Development Goals (UNSDGs), the Ten Principles of the UN Global Compact, the International Sustainability Standards Board’s (ISSB) *IFRS Sustainability Disclosure Standards*, the *Corporate Governance Code for Listed Companies*, and the *Guidelines No.14 of Shanghai Stock Exchange for Self-Regulation of Listed Companies — Sustainability Report (Trial)*, and in consideration of the Company’s actual circumstances.

Scope of Application

This policy applies to all environmental, social, and corporate governance (ESG) work of Tongwei Co., Ltd. and its subsidiaries and affiliates. The Company also requires its suppliers, contractors, partners, and other relevant stakeholders to actively reference and implement this management policy.

Definitions

- **ESG:** An acronym for Environmental, Social, and Governance. The environmental aspect involves a company's impact on the ecological environment, such as pollutant emissions and energy consumption; the social aspect involves its responsibilities to stakeholders like employees, communities, and customers, including labor rights, production safety, responsible purchasing, and employee health and safety; the corporate governance aspect involves the company's internal management and governance structure, such as its corporate governance structure, board composition, and anti-corruption mechanisms.

- **Stakeholders:** Individuals or organizations that are affected by or can affect a company's decisions and activities, including but not limited to government bodies, investors, shareholders, company management, employees, customers, suppliers, partners, the media, and the general public.
- **ESG issues:** Refers to the specific issues within the three dimensions of environmental, social, and corporate governance, which are the breakdown and detailed components of E, S, and G.
- **Double materiality:** This includes both financial materiality and impact materiality.
- **Financial materiality:** Refers to opportunities or risks related to ESG issues that have or could have a significant impact on a company's financial position, cash flows, or access to financing in the short, medium, or long term.
- **Impact materiality:** Refers to risks or opportunities related to ESG issues that have or could have a significant actual or potential positive or negative impact on the environment and society in the short, medium, or long term.

Organizational Structure

- **ESG governance structure:** The Company has established a three-tiered sustainability governance structure of "decision-making – management – execution" and adopted "dynamic identification, rapid response, and resilient development" as its working principle to systematically build its sustainability governance system.
- **Decision-making level:** The Board of Directors serves as the highest decision-making body, responsible for the overall decision-making and supervision of sustainability matters and guiding the Company's sustainable development strategy deployment. It reviews, approves, and updates sustainability principles, policies, strategic goals, plans, and other significant sustainability matters. The Strategic & Sustainable Development Committee is responsible for studying sustainability-related matters and providing recommendations, and it authorizes the ESG Management Committee to carry out specific tasks.
- **Management level:** The ESG Management Committee is led by the Chairman of the Company and comprises eight core management personnel. It is responsible for reviewing the Company's sustainability policies, strategies, risks, systems, and regulations, and supervising the implementation of related sustainability strategies. The ESG Management Working Group is responsible for identifying the impacts and risks of various sustainability issues, promoting the formulation of

sustainability plans and goals, integrating resources to advance cross-business cooperation, and fostering a sustainable business ecosystem.

- **Executive level:** The ESG Management Working Group oversees the Sustainability Group, which is responsible for issue impact and risk assessment, capacity building, benchmarking analysis, standardization, and information disclosure. ESG representatives from various departments and ESG management working groups at all subsidiaries and affiliates are responsible for participating in setting the Company's sustainability goals and planning roadmaps, carrying out special sustainability improvement initiatives, and implementing the Company's overall sustainable development strategy.

Key Issue Management

- **Source of ESG issues:** Each year, the Company identifies issues that may impact the Company and its stakeholders by referencing documents such as the *Guidelines No.14 of Shanghai Stock Exchange for Self-Regulation of Listed Companies — Sustainability Report (Trial)*, the Hong Kong Stock Exchange's *Environmental, Social and Governance Reporting Code*, the Global Reporting Initiative (GRI) Standards, the Sustainability Accounting Standards Board (SASB) Standards, the Recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), and the United Nations Sustainable Development Goals (UN SDGs).
- **Identification of issues with financial materiality:** After identifying potentially impactful issues, the Company distributes questionnaires to internal heads and experts in finance, investment, supervision, risk control, and procurement. It uses quantitative criteria (positive or negative financial impact exceeding 5% of revenue, costs, profit, or net assets) and qualitative criteria (relative comparison of the financial impact of issues) to identify the issues with the highest financial materiality for that year.
- **Identification of issues with impact materiality:** After identifying potentially impactful issues, the Company distributes survey questionnaires to all internal and external stakeholders. It evaluates the impact materiality of issues for the Company based on three aspects: scale of impacts (the magnitude of the issues' impact on the economy, society, and environment), scope of impacts (the extent of the issues' impact on the economy, society, and environment), and irremediability (the difficulty for the Company to remedy any negative impact if the impact were to occur).
- **Identification of double materiality issues:** The Company defines issues that are assessed as material from both financial and impact perspectives as its double materiality issues for the year. The Company appropriately adjust the content of these issues based on actual business conditions.

- **Management of double materiality issues:** The Company's management of double materiality issues includes communicating with stakeholders on these issues, setting related strategies and goals, and implementing relevant management and control measures.

Stakeholder Survey

- **Stakeholder identification:** The Company places great importance on the opinions and demands of its stakeholders, viewing them as key to its continued operations and development. Each year, the Company identifies and updates its internal and external stakeholders. Based on the *Guidelines No.14 of Shanghai Stock Exchange for Self-Regulation of Listed Companies — Sustainability Report (Trial)*, the Global Reporting Initiative (GRI) Standards, or other common international and domestic standard practices, and with reference to industry conditions, the Company identifies parties that may be affected by its products or services, or whose actions may affect the execution of its strategy or achievement of its goals, and considers them its stakeholders.
- **Stakeholder communication:** The Company proactively broadens its channels for stakeholder communication, using diverse forms of communication to fully listen and respond to the concerns and expectations of all stakeholders. At the same time, the Company establishes, maintains, and provides timely responses through corresponding stakeholder communication channels based on the issues of concern and communication characteristics of different stakeholders. The results of this communication will be disclosed in each year's ESG report.

Strategy and Goal Management

- **ESG environment analysis:** The Company pays close attention to dynamic changes in the internal and external ESG policy, institutional, and natural environments. The Company regularly tracks and identifies changes in external ESG policies and systems, conducts special analyses of major ESG environmental changes, and reports its findings to Company management.
- **ESG strategy management:** Based on its ESG environment analysis and stakeholder concerns, the Company has proposed the "Together to Win" sustainable development strategy. Its three sustainable development

missions are to "Build Together", "Govern Together", and "Share Together", aiming to foster a sustainable and high-qualtiy life, and it defines the Company's four sustainable development visions as "Winning People", "Winning Progress", "Winning Environment", and "Winning Economy".

- **ESG goal management and assessment:** The Company translates its ESG strategy into quantifiable and manageable goals, systematically formulating short-, medium-, and long-term ESG goals around the three pillars of environment, society, and governance. It reports on the progress of each goal annually in its ESG report. Additionally, the Company links executive performance compensation to ESG performance indicators, covering multiple key ESG issues such as climate change management, green supply chain, occupational health and safety, and business ethics, to ensure that the management team plays an active role in promoting the achievement of sustainable development goals.

Policy and System Management

- **ESG policy management:** The Company has systematically formulated and publicly released various sustainability commitments and policy documents. These cover a wide range of areas, including environmental management, human rights management, compensation and performance, responsible mineral sourcing, information security, and biodiversity and forest protection.
- **ESG system management:** The Company has formulated the Tongwei Co., Ltd. Environmental, Social and Governance (ESG) Management Measures to comprehensively regulate its ESG management work, ensure the effective operation of its ESG management system, and strengthen its core competitiveness in sustainable development.

The Company has established a dynamic mechanism for updating its policies and systems, periodically reviewing and revising them in a timely manner based on domestic and international policies, regulatory requirements, and industry developments.

Audit and Capacity Building

- **ESG audits:** The Company regularly conducts internal and external ESG audits for its various projects, covering key areas such as human rights due diligence management, responsible purchasing, response to climate change, product carbon footprint management, sustainable eco-product design, the Circular Economy, occupational health and safety, and quality. Concurrently, the Company has established a closed-loop management mechanism for the entire audit process to continuously ensure the effectiveness and smooth operation of its overall ESG management system.

- **ESG capacity building:** The Company regularly organizes internal and external training sessions and exchanges on ESG-related topics, including climate change, energy conservation and consumption reduction, compliance management, and information security, to continuously empower and enhance the sustainable development management awareness and capabilities of its subsidiaries and affiliates in their daily operations. The Company also places great importance on collaborative growth with its suppliers and partners, having launched a supply chain partner empowerment program that organizes specialized ESG training and on-site coaching to continually deepen strategic trust and a shared ESG consensus.

Information Disclosure and Feedback

- **ESG report publication:** The Company strictly adheres to the requirements of standards such as the *Guidelines No.14 of Shanghai Stock Exchange for Self-Regulation of Listed Companies — Sustainability Report (Trial)*, the Global Reporting Initiative (GRI) Standards, the United Nations Sustainable Development Goals (UNSDGs), and the International Sustainability Standards Board (ISSB) Standards when publicly releasing its annual ESG report, and also engages qualified professional third-party organizations to conduct independent assurance work on the report.
- **Regular information disclosure:** The Company places a high value on the transparency of ESG information, regularly summarizing the results of its ESG practices and disclosing this information on an ongoing basis through channels such as the sustainable development page of its official website and its official WeChat account.
- **Specialized information disclosure:** Each year, the Company proactively participates in external thematic disclosures through rating and disclosure platforms such as the Carbon Disclosure Project (CDP) and the S&P Global Corporate Sustainability Assessment (CSA).
- **Feedback and communication:** The Company has always regarded feedback from stakeholders as a key driver for the continuous improvement of its ESG management. It has established a dedicated official email

address (twesg@tongwei.com) as a communication channel for ESG matters, which is open to all stakeholders for receiving opinions, suggestions, and inquiries regarding the Company's ESG performance.

CEO: Shuqi Liu

Tongwei Co., Ltd.

Date: August 2026

Remarks:

1. The Company encourages and supports its 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. 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.