# Tongwei Co., Ltd.

# Responsible Mineral Sourcing Management Commitment and Policy

## Responsible Mineral Sourcing Management Commitment:

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. This is to ensure that the Company avoids risks of contributing to conflict, serious human rights abuses and gross negligence within the supply chains of relevant raw materials and minerals that it may use.

The Company commits to complying with international conventions and standards, including the United Nations Global Compact, the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals in Conflict-Affected and High-Risk Areas, and .the Chinese Due Diligence Guidelines for Mineral Supply Chain. By establishing a standardized management system, the Company responsibly sources mineral raw materials such as tantalum, tin, tungsten, and gold (3TG), cobalt, mica, and colored gemstones used in its products, as well as key materials for the solar supply chain like quartz and silicon, striving to ensure all product raw materials are ethically sourced.

## Responsible Mineral Sourcing Management Policy:

### I. Risk Management for Severe Abuses Associated with the Extraction, Transport, or Trade of Minerals

**1. Zero Tolerance for Severe Abuses**

When conducting procurement or business activities in conflict-affected and high-risk areas, the Company will neither tolerate nor in any way profit from, contribute to, assist with, or facilitate the commission by any party of:

- Any form of torture, cruel, inhuman, and degrading treatment;
- Any form of forced or compulsory labor, meaning any work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily;
- The worst forms of child labor, which are acts in violation of the International Labor Organization (ILO) Convention on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor;
- Other gross human rights violations and abuses, such as widespread sexual violence;
- War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

### 2. Risk Management for Severe Abuses

If we have reasonable grounds and evidence to believe that such a risk exists in the supply chain—that is, an upstream supplier is sourcing from or is associated with any party committing the severe abuses stipulated in Article 1—we will immediately suspend or disengage from that supplier.

## II. Risk Management for Direct or Indirect Support to Non-State Armed Groups

1. The Company will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, processing, or export of minerals. This includes, but is not limited to, purchasing minerals from, making payments to, or otherwise providing logistical support or equipment to non-state armed groups or their affiliates. Zero-tolerance actions regarding armed groups or their affiliates include:

- Illegal control of mine sites, or otherwise controlling transportation routes, points where minerals are traded, and upstream actors in the supply chain;
- Illegal taxation or extortion of money or minerals at points of access to mine sites, along transportation routes, or at points where minerals are traded;
- Illegal taxation or extortion from intermediaries, export companies, or international traders.

2. If the Company has reason and evidence to believe that an upstream supplier is sourcing from or has a relationship with any party providing direct or indirect support to non-state armed groups (as defined in Section III), the Company will immediately suspend or disengage from that supplier.

### III. Risk Management for Public or Private Security Forces

1. The Company prohibits providing direct or indirect support to public or private security forces that engage in the following behaviors:

- Illegally controlling mine sites, or otherwise controlling transportation routes, points where minerals are traded, and upstream actors in the supply chain;
- Illegally taxing or extorting money or minerals at points of access to mine sites, along transportation routes, or at points where minerals are traded;
- Illegally taxing or extorting from intermediaries, export companies, or international traders.

2. The Company considers the only legitimate roles of public or private security forces at and around mine sites and along transportation routes to be maintaining the rule of law, including safeguarding human rights, protecting miners, equipment, and facilities, and securing mine sites or transportation routes to allow for legitimate extraction and trade to proceed without interference.
3. The Company will actively cooperate with local governments, social organizations, and other relevant parties to guide public or private security forces in the supply chain to operate reasonably and in compliance, thereby minimizing their negative impact on the local area.
4. If the Company has reasonable grounds and evidence to believe that this risk exists in the supply chain, it will work with the at-risk supplier to mitigate the impact of this risk.

### IV. Risk Management for Money Laundering, Bribery, and Corruption Related to the Extraction, Transport, or Trade of Minerals

1. The Company prohibits bribery in any form and at any stage, and opposes all forms of money laundering.
2. If the Company has reasonable grounds and evidence to believe that this risk exists in the supply chain, it will work with the at-risk supplier to mitigate the impact of this risk.

## Measures for Responsible Mineral Sourcing Management:

### I. The Company's Management Structure and Mechanisms

### 1. Management Structure

The Company has established a supply chain due diligence management structure with overall coordination by the headquarters' Global Supply Chain Center and synergistic collaboration among business entities, forming a closed-loop management system that spans headquarters coordination, business segment collaboration, and grassroots implementation.

## 2. Management Mechanisms

(1) The Company strictly adheres to relevant laws and regulations such as the *Company Law of the People's Republic of China* and the *Bidding Law of the People's Republic of China*, and has formulated a comprehensive supplier management system based on its business needs, including specialized management systems and regulations like the *Tongwei Co., Ltd. Procurement Management System* and the *Tongwei Co., Ltd. Supplier Management Measures*, to continuously enhance the standardization and efficiency of end-to-end supplier management.

(2) In policies such as the Tongwei Co., Ltd. Supplier Management Measures, the Company clearly defines the admission process for qualified suppliers to strictly control supplier quality. The Company has systematically upgraded its supplier admission management methods, optimized the qualification standards for suppliers of various materials, and adjusted the ESG on-site audit requirements for new suppliers. Concurrently, the Company has publicly disclosed its supplier admission requirements on its website, ensuring that standards are open and processes are transparent throughout.

(3) In the *Tongwei Co., Ltd. Supplier Management Measures*, the Company explicitly requires the integration of sustainable development factors into the review process for new suppliers and the annual evaluation system for qualified suppliers, strengthening performance management in areas such as Business Ethics, human rights and labor, environmental protection, and health and safety. The signing rate for the *Supplier Social Responsibility Commitment*, *Supplier Compliance Commitment*, and *Supplier Guidelines* among the Company's major raw material suppliers has reached 100%.

(4) The Company has established a comprehensive Conflict Minerals management mechanism, requiring suppliers to sign the *Tongwei Co., Ltd. Supplier Conflict Minerals Commitment and Declaration* upon admission and incorporating content on Conflict Minerals and controversial sourcing into the *Supplier ESG Audit Checklist*. Furthermore, the Company explicitly requires its tier-1 suppliers to ensure they are not involved in controversial sourcing and to pass down responsible mineral sourcing principles to their own upstream suppliers, promoting compliance management throughout the entire supply chain. The signing rate for the Company's *Tongwei Co., Ltd. Supplier Conflict Minerals Commitment and Declaration* among relevant suppliers has reached 100%. Following investigation, none of the Company's partner suppliers are involved with Conflict Minerals.

# II. Risk Identification and Assessment

## 1. ESG Risk Identification and Assessment

(1) The Company has established an ESG risk management system that covers the entire supplier lifecycle. ESG audit mechanisms covering key issues such as Environmental Management, labor rights, and Business Ethics are in place for both new supplier admission and annual reviews of qualified suppliers, with a one-strike veto for suppliers who violate ‘zero tolerance’ clauses.
(2) The Company uses a ‘supplier scorecard’ to evaluate suppliers, with scoring dimensions covering labor rights, Business Ethics, and Environmental Management. Under equal conditions, suppliers with higher scores are given priority for inclusion. By the end of 2025, the Company will have achieved 100% ESG risk identification and assessment coverage for its core suppliers of major raw materials.

## 2. Conflict Mineral Risk Identification and Assessment

(1) The Company assesses the activities of all upstream suppliers, requiring metal material suppliers to complete the Sustainable Supply Chain Conflict Minerals Due Diligence Questionnaire to determine the scope of mineral supply chain risks, including the types of minerals involved, their primary origins, and smelter locations.
(2) The Company has established procedures to identify conflicted-affected and high-risk areas (CAHRAS). The Company monitors minerals with potential conflict risks on a quarterly basis and updates its CAHRAs monitoring list. The Company uses the following resources to identify CAHRAs:

1）The Heidelberg ‘Global Conflict Barometer’[1]

2）The Dodd-Frank Act[2]

3）The EU Conflict-Affected and High-Risk Areas (CAHRA) List[3]

4) The Global Corruption Perception Index [4]

5）The UN Human Development Index [5]

(3) The Company refers to the standards of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*[6] and the *Chinese Due Diligence Guidelines for Mineral Supply Chains*[7] to identify raw material mineral risks and match them with appropriate mitigation measures.

## 3. Risk Reporting

[1] The Conflict Barometer 2023 ,https://hiik.de/conflict-barometer/current-version/?lang=en/
[2] Dodd-Frank Act,
https://www.cftc.gov/sites/default/files/idc/groups/public/@swaps/documents/file/hr4173_enrolledbill.pdf
[3] List of conflict-affected and high-risk areas (CAHRAs) (as defined under Regulation 2017/821) ,https://www.cahraslist.net/
[4] Corruption Perceptions Index,https://www.transparency.org/en/cpi/2024
[5] Human Development Index (HDI),https://hdr.undp.org/data-center/human-development-index#/indicies/HDI
[6] 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
[7]Chinese Due Diligence Guidelines for Mineral Supply Chains,
https://img06.mysteelcdn.com/wz/uploaded/steel/2022/07/27/144606.pdf

(1) The Company's head of supply chain regularly reports supply chain risks to top management. Senior management is responsible for matters related to supply chain risk.
(2) The Company has conducted specialized training on the OECD Guidance and sustainable supply chains for its supply chain team. For 2025, the training coverage will be 100%, and training records are archived for inspection.

## III. Risk Management and Mitigation

### 1.Full Lifecycle Management of ESG Risks

(1) For any non-conformities identified in a supplier's ESG risk assessment, the Company requires the supplier to submit a detailed rectification plan and supporting documentation within seven working days and establishes a full-process tracking mechanism to ensure the closure of the rectification loop.
(2) When the supplier's ESG audit results are available, the Company requires them to provide feedback on corrective actions and evidence of improvement for the non-conformities within a three-month period and to close the loop in the system.

### 2. Conflict Mineral Risk Mitigation

(1) After understanding the actual and potential risks associated with Conflict Minerals, the Company reviews its supply chain to determine whether the identified risks can be reduced by maintaining, temporarily suspending, or terminating relationships with suppliers.
(2) For risks that do not require the termination of supplier relationships, the Company develops risk mitigation plans based on risk levels and collaborates with suppliers to reduce these risks. The risk plans are developed in consultation with suppliers and affected stakeholders to ensure that affected stakeholders have sufficient time to review the risk assessment and to consider and respond to issues, concerns, and other suggestions regarding risk management.
(3) Risk mitigation response timeline: When a supplier is identified as having risks specified in the OECD guidance, the supplier must submit a rectification plan within seven working days and provide corrective actions and other evidence of improvement for non-conformities according to the plan; the non-conformities must be rectified and closed within three months.
(4) Decision-making criteria: ① Continued cooperation: The supplier completes rectification within the agreed timeframe, all quantitative indicators are met, and the Company confirms after review that the risk has been eliminated; ② Termination of cooperation: If a supplier refuses to cooperate with rectification or engages in OECD zero-tolerance behaviors (such as using child labor, forced labor, or supporting non-state armed groups), a one-strike policy is implemented, prohibiting access or deferring cooperation until a rectification assessment is passed.

(5) Record of stakeholder participation in implementation: In 2025, the Company consulted with suppliers and relevant stakeholders on its supply chain risk mitigation plan.

### 3. Performance Monitoring and Review

(1) The Company monitors supplier sustainable development performance through a dual-dimensional EHS and ESG tracking system, combined with supplier self-assessment reports and on-site audits, providing targeted improvement suggestions and urging suppliers to rectify issues within specified deadlines, thereby systematically enhancing the sustainable development capabilities of the supply chain.
(2) The Company regularly conducts due diligence questionnaire and audit cross-validation on conflict minerals to strengthen responsible supply chain management.
(3) The Company periodically reviews the operational status of its due diligence management system, summarizes its findings, and proposes areas for improvement and corresponding measures.

## IV. Public Reporting

To further enhance the transparency of the Company's supply chain management, the Company regularly discloses performance related to responsible mineral management in the *Tongwei Co., Ltd. Sustainability Report* and the *Tongwei Co., Ltd. Responsible Supply Chain Due Diligence Management Report*.

## V. Training and Capacity Building

The Company will provide training on responsible mineral sourcing to employees in relevant positions to ensure that both Company employees and suppliers understand and comply with this policy. It will also encourage its suppliers to establish and improve their responsible mineral management and supervision mechanisms to continuously enhance the risk control level of the mineral supply chain.

## VI. Communication and Grievances

1. The Company maintains a sound reporting and complaint mechanism, ensuring clear internal and external reporting channels. It encourages all employees and external stakeholders to report any actual or suspected misconduct related to the Company and permits anonymous reporting. All reports of misconduct will be investigated by the receiving department, and measures will be taken based on the investigation results.
2. In accordance with regulations such as the *Tongwei Group Supervision Work Regulations*, the Company legally protects the information of every whistleblower. The Company and its employees

must not discriminate against, retaliate against, or harm whistleblowers. Any harassment, discrimination, retaliation, or harm against a whistleblower will be considered serious misconduct, and the Company reserves the right to take appropriate action. If any individual believes they have been subjected to retaliation, they may immediately report the behavior and provide relevant evidence.

3. Main grievance channels

| Grievance Channel | |
|---|---|
| Telephone | (028)86168834、(028)86168838 |
| Mobile | 15608175053 (Also for WeChat) |
| WeChat Official Accounts Platform | Search and follow "Lianjie Tongwei" |
| Email | jcb@tongwei.com |
| Mailing Address | Supervision Department, Tongwei International Center, 588 Tianfu Avenue Middle Section, Chengdu, Sichuan Province |

To protect the labor, human rights, health, and environment of mineral-producing countries and regions, Tongwei Co., Ltd. is committed to sourcing non-conflict minerals in its supply chain, using only reliably sourced ‘non-conflict minerals’ to continuously strengthen its responsible purchase program.

CEO: Liu Shuqi

Tongwei Co., Ltd.

Date: March 2026

Note:

1. The Company encourages and supports its suppliers and partners in adopting and implementing additional principles and policies, provided that they comply with this policy and that such additional principles and policies do not conflict with it.
2. The Company's business operations strictly adhere to local laws and regulations. Where no specific local laws or regulations exist, this policy shall be implemented.
3. This document is subject to interpretation and revision by Tongwei Co., Ltd. The Company will update the document as appropriate based on domestic and international policies, regulatory requirements, and industry developments. In case of any conflict between the Chinese and English versions of this document, the Chinese version shall prevail.