

GCL Technology Partner Statement

As a supply chain partner of GCL Technology Holdings Limited and/or its subsidiaries and affiliates (collectively referred to as “GCL Tech” in the CSR Code of Conduct), we acknowledge that we are aware of the "GCL Tech Supply Chain Partner Social Responsibility Code of Conduct" (as attached, hereinafter collectively referred to as "CSR Code of Conduct" along with this statement) and hereby make the following commitments and declarations:

1. Integrity and Compliance with Business Ethics

- 1) In addition to complying with the commitments under the procurement/supply agreements signed with GCL Tech, we will adhere to the principles and requirements of the CSR Code of Conduct.
- 2) If we or our partners are or may be listed on any restrictive or punitive lists such as the list of enterprises with abnormal operations, the list enterprises with serious illegal and dishonest acts, the blacklist, or the disciplinary list, or are at risk of being punished by the government/regulatory authorities, we will immediately notify GCL Tech's supply chain management department by phone and written email, and respond to and implement relevant improvement measures as required by the relevant government/regulatory authorities and GCL Tech.
- 3) If a transaction is concluded, unless explicitly permitted by contract, without the prior written consent of GCL Technology, we commit not to engage in any anti-competitive activities or participate in anti-competitive agreements or business practices, including but not limited to colluding in tenders or bids for GCL Tech projects.
- 4) We will comply with GCL Tech's principles of transparent procurement, fully understand and comply with GCL Tech’s anti-corruption and anti-fraud policies and related requirements, and will not provide any valuable property, opportunities, or benefits to GCL Tech’s employees or other stakeholders through direct or indirect means to achieve transaction objectives.

2. Procurement Business Requirements

- 5) We acknowledge that the procurement department of GCL Tech's supply chain is the only window for procurement business within GCL Tech Group. GCL Tech

does not recognize nor assume any legal responsibility for non-written commitments made by any other personnel outside the procurement department.

- 6) In accepting GCL Tech's procurement, we will comply with national and local laws and regulations, adhere to ethical principles, and follow GCL Tech's procurement business code of conduct. We are committed to managing our procurement activities in a correct and sustainable manner, including but not limited to the bidding process and supplier selection.

3. Responsible Supply Chain

- 7) We will, as required by GCL Technology:

- i. Provide periodic or ad hoc written self-assessments in the format provided by GCL Tech, and also written reports and documentation of actions taken or to be taken to ensure our compliance with the CSR Code of Conduct.

- ii. Fully cooperate with GCL Tech's annual investigations into the social responsibility performance of its partners and actively implement similar investigations regarding our partners.

- 8) Allow GCL Tech or a third party designated by GCL Tech to conduct audits at our premises and/or those of our affiliates to verify compliance with the CSR Code of Conduct, subject to reasonable acceptance.

- i. These audits will be conducted during normal working hours with prior written notice from GCL Tech and in compliance with applicable data protection and intellectual property laws, without unduly disrupting our business operations or violating confidentiality agreements with third parties. We agree to cooperate reasonably with such audits and bear related costs, while GCL Tech will cover its own costs.

- ii. If we timely provide GCL Tech with audit reports on our corporate social responsibility management systems, due diligence procedures, and supply chain security management systems, which are less than 12 months old, comply with international standards, and are issued by a trustworthy and recognized audit firm, we may refuse GCL Tech's audit requests. However, if GCL Tech has reason to suspect non-compliance with the CSR Code of Conduct, it can still conduct reasonable audits.

- iii. Prepare and implement corrective and preventive action plans based on audit findings and participate in rectification actions.

- 9) We ensure that the products we provide (whether individual products or materials used in products) do not contain any components sourced or produced unethically, conduct reasonable inquiries into the country or origin of all components within the supply chain, participate in established supply chain communication processes. We will also immediately start further inspection to verify if our products contain unethical procurement or production , and provide legitimate documentation to GCL Tech. Additionally, we will endeavor to ensure that our partners comply with the representations and warranties in this clause.

4. Other Provisions

- 10) In addition to other rights and remedies that GCL Tech may have, if we violate the CSR Code of Conduct, even after GCL Tech provides reasonable notice and a reasonable opportunity to remedy, GCL Tech may still terminate any signed procurement agreements and/or issued procurement orders without liability. However, the notice and remedy opportunity provisions do not apply to the following:
 - i. Our severe or repeated non-compliance with the CSR Code of Conduct, including but not limited to fraud, falsification, use of child labor, bribery, confidentiality breaches, and intellectual property violations.
 - ii. Our refusal to agree to GCL Tech's audit rights as stipulated in this statement.
- 11) If we violate the above commitments, we shall be liable for any losses caused to GCL Tech, and GCL Tech has the right to pursue economic compensation in accordance with the terms of the relevant contracts with us.
- 12) If the "GCL Tech Supply Chain Partner Social Responsibility Code of Conduct" is adjusted, GCL Tech will promptly update it on the following website: www.gcltech.com/esg.html. We commit that the updated version of the CSR Code of Conduct will continue to apply to us from the date of its update.
- 13) We agree that in the event of any inconsistency between the English and Chinese versions of this statement, the Chinese version shall prevail.

5. Complaints and Reporting

- 14) During the cooperation process, if we discover any violations of GCL Tech's integrity cooperation policies by GCL Tech personnel, or any relevant behaviors or potential possibilities of violating the CSR Code of Conduct or applicable laws

and regulations, we and our relevant employees are obligated to promptly disclose all such situations to GCL Tech.

GCL Tech's complaint reporting channels are as follows:



Reporting Hotline

0512-68538110

Reporting Email

jubao@gcl-power.com

Attachment: "GCL Tech Supply Chain Partner Social Responsibility Code of Conduct"

CSR Code of Conduct Signing Page

Company Name/Official Seal and Seal Across Pages

Authorized Representative Signature or Seal

Date

Attachment:

GCL Tech Supply Chain Partner Social Responsibility

Code of Conduct

Ver. 2024-1

GCL Technology Holdings Limited and/or its subsidiaries and affiliates (hereinafter referred to as "GCL Tech") bear the mission of "focusing on green development and continuously improving the living environment of mankind." As a global leader in the research and development and intelligent manufacturing of high-efficiency photovoltaic materials, GCL Tech is committed to mastering the development direction of high-efficiency photovoltaic material technology through research and innovation and intelligent manufacturing. We collaborate with partners to deeply cultivate and innovate in the photovoltaic field, building a green industrial ecosystem together, and provide behavioral guidelines for supply chain partners (hereinafter referred to as "partners") to undertake social and environmental responsibilities and adhere to business ethics, reducing the impact of operations on the environment and actively contributing to society. Based on this, GCL Tech firmly believes that through joint efforts with partners, we can promote responsible performance in corporate governance, social and environmental aspects, and build a sustainable supply chain together.

The "GCL Tech Supply Chain Partner Social Responsibility Code of Conduct" (hereinafter referred to as "this Code") is based on relevant laws and regulations and the International Labour Organization (ILO) Convention, referencing the "Responsible Business Alliance Code of Conduct" (RBA Code), and international standards such as SA8000, ISO14001, ISO45001, EU Battery Regulation, SSI, and combined with GCL Tech's corporate social responsibility requirements for partners. It is also part of the GCL Tech Partner Statement.

This Code outlines GCL Tech's expectations and requirements for partners in terms of labor protection, occupational health and safety, environmental protection, ethical standards, and social responsibility management systems. To ensure partners conduct business with high integrity and responsibility towards society and the environment, all GCL Tech partners must comply with this Code. GCL Tech requires partners to comply

with all applicable laws and regulations of the country/region where they operate in all their business activities, which is a prerequisite for cooperating with GCL Tech. GCL Tech will periodically evaluate partners' compliance with this Code and adjust their evaluation levels accordingly. Any violations of this Code may jeopardize the business relationship between partners and GCL Tech, including but not limited to termination of cooperation and compensation for losses.

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1. Basic Principles

1.1 Compliance with Laws and Regulations

Comply with all applicable laws, regulations, normative government documents, and regulatory requirements of the country/region in which they operate.

Follow the applicable international conventions and practices (such as the ILO Declaration on Fundamental Principles and Rights at Work, and UN principles).

1.2 Adherence to Honesty and Business Ethics

Commit to honesty throughout all stages of cooperation, without falsification or deception.

Avoid conflicts of interest or self-dealing, and refrain from any unethical or dishonest behavior that could harm GCL Tech.

Adhere to business ethics and ensure actions align with societal norms.

1.3 Compliance with Agreements with GCL Tech

Familiarize, understand, and comply with GCL Tech's requirements for partners and their products, including this Code.

Establish and continuously improve procedures, systems, and processes for traceability from raw materials to product delivery to ensure compliance with GCL Tech's procurement standards and reasonable requirements.

1.4 Adherence to Other Principles

Recognize the direct or indirect impact of their activities on individuals, local economies, and societal well-being. Strive to build responsible social relationships, invest and operate sustainably and promote high-quality local social development.

2. Scope

This Code applies to partners providing products and/or services to GCL Tech, including their employees, labor workers, apprentices, and foreign workers. Partners

are also expected to make reasonable efforts to ensure their upstream partners comply with similar requirements.

3. Main Content

This Code includes five sections: Labor, Health and Safety, Environmental Protection, Business Ethics, and Management Systems.

3.1 Labor

Partners commit to respecting employee rights and ensuring dignity for all employees, including temporary, migrant, apprentice, direct employees, and any other types of workers. Labor rights include:

3.1.1 Prohibition of Forced Labor

Prohibit any form of forced labor, including but not limited to bonded or debt labor, involuntary or exploitative prison labor, slavery, or human trafficking.

All work must be voluntary, and employees can leave freely or terminate their employment with reasonable notice without penalties.

Do not retain employees' personal identity documents or other valuable items to restrict their freedom.

3.1.2 Prohibition of Child Labor

Do not employ or use child labor in any form, in accordance with relevant ILO conventions (Conventions No. 138 and No. 182). Employees must meet the minimum age requirements stipulated by applicable laws.

3.1.3 Decent Work

Ensure employees receive reasonable rest time and fair wages and benefits as per applicable laws and regulations.

Ensure that overtime work is voluntary and paid according to relevant regulations.

3.1.4 Non-Discrimination/Non-Harassment/Humane Treatment

Respect employees' dignity and provide a workplace free from harassment and illegal discrimination.

Do not subject employees to violence, gender-based violence, sexual harassment, abuse, corporal punishment, mental or physical coercion, bullying, public humiliation, or verbal abuse. Do not threaten to implement such behavior.

3.1.5 Freedom of Association and Collective Bargaining

Recognize and respect employees' rights to freedom of association, assembly, organization, and collective bargaining as per applicable laws and regulations.

3.2 Health and Safety

Partners should understand that a safe and healthy working environment can reduce work-related injuries and illnesses, improve product and service quality, promote production, and enhance employee retention and morale. Continuous employee engagement and education are crucial for identifying and resolving workplace health and safety issues.

3.2.1 General Occupational Health and Safety

Strictly comply with safety and occupational health laws and regulations, establish a complete management system, and provide a safe and healthy work environment for employees. Ensure employee accommodation is safe, clean, and equipped with basic facilities.

Provide training and ensure internal and external employees are educated on health and safety issues to protect themselves and their colleagues.

Control hazards and take reasonable preventive measures to prevent accidents and occupational diseases.

3.2.2 Chemical Management

Partners should have relevant licenses and control, store, transport, use, and dispose of hazardous chemicals/materials per legal regulations, minimizing harm and risks to employees.

3.2.3 Fire Safety, Emergency Preparedness and Response

Identify and assess workplace and employee accommodation fire safety facilities and emergency preparedness, and implement appropriate plans and response procedures to prevent emergencies.

3.3 Environmental Protection

During cooperation with GCL Tech, partners should focus on environmental protection and establish a sustainable environmental management system, including:

- Obtaining relevant environmental permits and registrations. Conduct production in a manner that minimizes environmental impact, reduces wastewater, exhaust emissions, waste, and noise pollution, and protects natural resources and biodiversity.
- Implement conservation and alternative measures such as using renewable energy, reducing energy and natural resource consumption, and continuously promoting energy saving and emission reduction.
- Follow national and international environmental legislation developments, assessing and responding to environmental impacts based on specific projects.

3.4 Business Ethics

To fulfill social responsibilities, partners and their agents should adhere to the highest ethical standards, including:

3.4.1 Business Integrity

Maintain the highest standards of integrity in all business interactions. Adopt a zero-tolerance policy towards bribery, corruption, extortion, and embezzlement.

3.4.2 Anti-competitiveness

Do not promise, offer, authorize, give, or accept bribes or other forms of benefits to gain illegal or improper advantages.

Ensure compliance with anti-corruption laws through monitoring, record-keeping, and enforcement procedures.

3.4.3 Information Disclosure

Conduct transparent business dealings, accurately recording information related to business activities, labor protection, health and safety, and environmental practices.

Disclose information about labor, health and safety, environmental practices, and business activities per legal and industry practices without falsifying records or misrepresenting conditions or practices in the supply chain.

3.4.4 Intellectual Property Protection

Respect intellectual property rights, ensure technology or knowledge transfers are protected intellectual property rights and safeguarding customer and partner information security.

3.4.5 Fair Trade, Advertising, and Competition

Adhere to standards of fair trade, advertising, and competition.

3.4.6 Supply Chain Transparency and Responsible Sourcing

Disclose accurate supply chain information as required by GCL Tech, respecting business secrets and data protection principles.

Encourage responsible procurement within their supply chains, promoting social, environmental, and ethical responsibilities upstream.

3.4.7 Export, Import and Trade Controls

Partners shall comply with all applicable and effective trade controls, import and export controls, and related laws and regulations in the countries/regions where they operate. Trade compliance must be embedded into the company's systems and processes to achieve trade compliance management and supervision across all business activities.

3.4.8 Responsible Mineral Sourcing

Ensure non-use of "conflict minerals" in products, including gold, tantalum, tin, tungsten, and cobalt. Take responsible procurement measures to avoid directly or indirectly funding armed conflicts or unethical activities in conflict areas.

3.4.9 Privacy and Information Security

Partners shall protect personal privacy and comply with information security laws and regulatory requirements when collecting, storing, processing, transmitting, and sharing personal information of all individuals with whom they conduct business, including partners, customers, consumers, and employees.

3.4.10 Subcontract production

Subcontracting or further subcontracting of production is only permitted with the written approval of GCL Technology and after demonstrating that the subcontractor complies with this Code.

3.5 Management System

During their cooperation with GCL Technology, partners shall ensure that their management systems:

- Comply with applicable laws, regulations, and customer requirements related to GCL Technology's operations and products;
- Align with this Code and identify and mitigate business risks associated with this Code;
- Have well-established and effective grievance mechanisms; and
- Promote continuous improvement.

4. Others

4.1 Version Revision

GCL Tech will periodically revise this Code based on industry trends and developments in laws and regulations. Partners are expected to comply with the latest version of this Code.

4.2 Version Language

This Code is published in multiple languages. In case of discrepancies, the Chinese version shall prevail.