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东方日升新能源股份有限公司

RISEN ENERGY CO., LTD.

东方日升新能源股份有限公司

冲突矿产承诺与政策

Risen Energy Co.,Ltd.

Commitment and Policy on Conflict Minerals

冲突矿产承诺：

Commitment on Conflict Minerals:

东方日升新能源股份有限公司（以下简称“东方日升”或“公司”）始终坚持商业价值与社会责任并重，致力于以更高的道德标准开展业务。公司承诺遵守联合国全球契约、受冲突影响地区和高风险地区矿产供应链的尽职调查指导方针（OECD）、负责任的矿产倡议（RMI）等国际公约，《美国多德-弗兰克法案》第 1502 条规定和行业倡议，以负责任的方式采购产品中使用的钽、锡、钨、金、硅等矿产原料，竭力确保所有产品原材料取之有道。

Risen Energy Co., Ltd. (hereinafter referred to as "Risen Energy" or "the Company") has always adhered to a balanced approach between commercial value and social responsibility, striving to conduct business according to higher ethical standards. The Company commits to complying with the United Nations Global Compact, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD), the Responsible Mineral Initiative (RMI), and other international conventions, as well as Section 1502 of the U.S Dodd-Frank Wall Street Reform and Consumer Protection Act and industry initiatives. The Company promises to responsibly source minerals such as tantalum, tin, tungsten, gold, silicon used in its products, and to ensure that all raw materials are sourced ethically.

冲突矿产采购管理政策：

Conflict Minerals Procurement Management Policy:

东方日升遵循经济合作暨发展组织（OECD）所制定“来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南”的尽职调查架构，对供应商开展尽责调查，建立冲突矿产的管理机制，包括：

Risen Energy follows the due diligence framework set forth by the Organization for Economic Cooperation and Development (OECD) in the "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas." The Company conducts due diligence on its suppliers and establishes a conflict minerals management mechanism, including:

- **供应商尽职调查：**展开供应商年度调查工作，确保其采购的矿产不来源于高风险的冲突地区。评估供应商冲突矿产采买或使用状况，若发现存在冲突矿产风险，待整改无效后，需立即退出供应商库；
- **Supplier Due Diligence:** Conducting annual surveys of suppliers to ensure that the minerals they procure do not come from high-risk conflict regions. The Company evaluates suppliers' use of conflict minerals, and if any risks are identified, the supplier will be removed from the supplier database if corrective actions fail.
- **风险评估与管理：**对所有供应商进行定期的风险评估，识别并解决潜在的冲突矿产问题。我们将根据矿产来源的具体情况，采取适当的风险缓解措施。
- **Risk Assessment and Management:** Regularly conducting risk assessments on all suppliers to identify and address potential conflict mineral issues. Appropriate risk mitigation measures will be taken based on the specific situation of mineral sources.
- **矿产追溯：**制定供应商无冲突矿产采购政策，要求供应商完成《无冲突矿产调查表（CMRT）》问卷，将供应商是否涉及争议采购纳入现场审核及调查内容；

- **Mineral Traceability:** Developing a policy requiring suppliers to procure conflict-free minerals, and requiring suppliers to complete the Conflict-Free Mineral Reporting Template (CMRT). The status of whether suppliers are involved in disputed sourcing will be incorporated into on-site audits and investigations.
- **供应链合作与改善:** 本公司与供应商合作, 识别和分析供应商采购风险, 推动矿产来源的可持续性与合规性, 赋能供应商推动建立矿产冲突管理与监督工作机制。确保自身不涉及争议采购的同时, 要求供应商向上级供应商传递负责任矿产采购原则。以改善全球供应链的道德与环境责任。
- **Supply Chain Collaboration and Improvement:** Risen Energy collaborates with suppliers to identify and analyze procurement risks, promote the sustainability and compliance of mineral sources, and empower suppliers to establish conflict mineral management and oversight mechanisms. While ensuring that the Company itself is free from disputed procurement, Risen Energy also requires suppliers to pass on responsible mineral sourcing principles to their upstream suppliers to improve the ethical and environmental responsibility of the global supply chain.
- **拒绝使用冲突矿产:** 在无法追溯或证明矿产来源不涉及冲突地区的情况下, 我们将拒绝采购该矿产。对于存在风险的供应商, 将采取适当的纠正措施, 若无法整改, 将考虑更换供应商。
- **Rejection of Conflict Minerals:** If the source of minerals cannot be traced or proven not to originate from **conflict regions**, the Company will refuse to procure such minerals. For suppliers at risk, appropriate corrective measures will be taken, and if rectification is not possible, the supplier may be replaced.
- **持续改进:** 本公司将定期评审我们的政策与流程, 并根据行业发展与监管要求持续改进供应链管理, 确保符合有关法律要求。
- **Continuous Improvement:** The Company will regularly review its policies and processes and continuously improve supply chain management in accordance with industry developments and regulatory requirements to ensure compliance with relevant laws.

为了保护矿产生产国家及地区的劳工与人权、健康和环境，东方日升致力于供应链非冲突矿产采购，只使用来源可靠的“非冲突矿产”。除了钽、锡、钨、金、硅外，东方日升逐步要求供应商将更多矿物（如钴和云母等）纳入受冲突影响和高风险区域（Conflict-Affected and High-Risk Areas, CAHRAs）矿产调查与审查范围，以持续加强东方日升的负责任采购计划。

Risen Energy is committed to sourcing non-conflict minerals throughout its supply chain, ensuring the protection of labor, human rights, health, and the environment in the mineral-producing countries and regions. In addition to tantalum, tin, tungsten, gold, silicon, Risen Energy will gradually require suppliers to include additional minerals (such as cobalt and mica) in their conflict-affected and high-risk area (CAHRAs) mineral investigations and reviews to further strengthen the Company's responsible sourcing program.

东方日升新能源股份有限公司

Risen Energy Co.,Ltd.

2024 年 11 月

November 2024

备注：

Notes:

1、公司鼓励并支持供应商及合作伙伴在遵循本政策的前提下，采纳和执行额外的原则与政策，但这些额外原则和政策都不得与本政策产生冲突。

1. The Company encourages and supports its suppliers and partners to adopt and implement additional principles and policies in accordance with this policy, provided that these additional principles and policies do not conflict with this policy.

2、公司业务开展严格遵循所在地法律法规要求，若当地无明确法律法规要求时，执行本政策。

2. The Company's business operations strictly comply with the laws and regulations of

the location where it operates. If no specific laws and regulations are required locally, this policy will be enforced.

3、该文件由东方日升新能源股份有限公司解释和修订，公司会适时根据国内外政策、监管要求和行业发展情况对文件进行更新，当文件中英文版有冲突时，请以中文版为准。

3. This document is interpreted and revised by Risen Energy Co., Ltd. The Company may update the document based on domestic and international policies, regulatory requirements, and industry developments. In case of any conflict between the Chinese and English versions, the Chinese version shall prevail.