

**爱旭负责采购与  
冲突矿产政策**

**AIKO Responsible  
Procurement and  
Conflict Minerals Policy**



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### 1 目的 Purpose

为系统性规范矿产供应链合规管理，识别、防范、降低并消除可能直接或间接助长冲突、严重侵犯人权、破坏环境及违反商业道德等风险，特制定本政策。

This policy is established to systematically standardize the compliance management of the mineral supply chain, aiming to identify, prevent, mitigate, and eliminate risks that may directly or indirectly contribute to conflict, serious human rights violations, environmental damage, and breaches of business ethics.

本政策的制定与实施是基于《爱旭人权管理政策》框架下规范矿产采购的管理具体规定，并参考《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽责管理指南》（第三版）（以下简称《OECD 尽职调查指南》）、《中国负责任矿产供应链尽责管理指南》（第二版）、《多德-弗兰克华尔街改革与消费者保护法》第 1502 款以及《欧盟冲突矿产条例》等相关法律法规、指

导文件。

The formulation and implementation of this policy are based on the framework of the AIKO Human Rights Management Policy, serving as specific regulations for managing mineral procurement. It references relevant laws, regulations, and guidance documents including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition) (hereinafter referred to as the "OECD Due Diligence Guidance"), the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains (Second Edition), Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and the EU Conflict Minerals Regulation.

## 2 适用范围 Scope of Application

本政策适用于上海爱旭新能源股份有限公司及其子公司（包括但不限于浙江爱旭太阳能科技有限公司、天津爱旭太阳能科技有限公司、广东爱旭科技有限公司、珠海富山爱旭太阳能科技有限公司、滁州爱旭太阳能科技有限公司、山东爱旭太阳能科技有限公司等，以下统称为“爱旭”），涵盖钨、锡、钽、金、钴、云母、铜、铝和硅等矿产供应链。同时，爱旭要求所有供应商及其上游供应商严格遵守本政策并积极践行。

This policy applies to Shanghai Aiko Solar Energy Co., Ltd. and its subsidiaries (including but not limited to Zhejiang Aiko Solar Technology Co., Ltd., Tianjin Aiko Solar Technology Co., Ltd., Guangdong Aiko Solar Technology Co., Ltd., Zhuhai Fushan Aiko Solar Technology Co., Ltd., Chuzhou Aiko Solar Technology Co., Ltd., Shandong Aiko Solar Technology Co., Ltd., etc., collectively referred to as "AIKO"). It covers supply chains for minerals such as tungsten, tin, tantalum, gold, cobalt, mica, copper, aluminum, and silicon. AIKO also requires all suppliers and their upstream suppliers to strictly comply with and actively implement this policy.

### 3 承诺与目标 Commitments and Objectives

爱旭承诺在所有商业活动中遵守商业道德和法律规范，尊重并保护人权、绝不参与任何可能助长冲突、侵犯人权或对环境和社会造成负面影响的活动。

AIKO is committed to adhering to business ethics and legal norms in all commercial activities, respecting and protecting human rights, and refraining from any involvement in activities that may contribute to conflict, violate human rights, or negatively impact the environment and society.

爱旭对任何与侵犯人权、助长冲突相关联的矿产采购与使用行为持“零容忍”态度，

并作出以下承诺：

AIKO maintains a "zero-tolerance" stance towards any mineral procurement or use associated with human rights violations or the fueling of conflict, and makes the following commitments:

- 不采购、不使用来源涉及直接或间接资助武装团体、或者助长冲突与人权侵犯的矿产，尤其关注来自受冲突影响和高风险区域的矿产。
- Not to procure or use minerals whose sources involve direct or indirect funding of armed groups or contribute to conflict and human rights abuses, with particular attention to minerals from conflict-affected and high-risk areas.
- 不与直接或间接从受冲突影响地区开展采购活动的供应商及其相关联的实体开展合作。
- Not to cooperate with suppliers or their associated entities that directly or indirectly source from conflict-affected areas.
- 严格遵守联合国相关制裁决议，遵守旨在执行此类决议的所有适用的国内法律法规。
- To strictly comply with relevant United Nations sanctions resolutions and all applicable domestic laws and regulations enacted to enforce such resolutions.

### **3.1 供应链负责任矿产管理目标 Supply Chain Responsible Minerals Management Objectives**

爱旭致力于对 100% 涉及冲突矿物的原材料供应商开展尽职调查，要求其提供《无冲突矿产声明》和《原材料产地证明》，并回应 CMRT 或 EMRT 冲突矿产调查问卷，不断完善冲突矿产管理体系，以更严格的审核标准，确保原材料生产地区的人权、健康和环境不受侵害。

AIKO is dedicated to conducting due diligence on 100% of raw material suppliers involved in conflict minerals. We require them to provide Conflict-Free Minerals Declarations and Proof of Raw Material Origin, and to respond to the CMRT or EMRT conflict minerals survey questionnaires. We continuously improve our conflict minerals management system, applying stricter audit standards to ensure that human rights, health, and the environment in raw material production regions are not compromised.

### **3.2 供应链风险管理具体承诺 Specific Commitments on Supply Chain Risk Management**

#### **3.2.1 与矿产开采、运输、或交易有关的严重侵权行为 Serious abuses associated with mineral extraction, transport, or trade**

(1) 在高风险区域开展采购或经营活动时，爱旭绝不容忍、也绝不会以任何方

式从下列行为中获利，亦不提供任何形式的帮助、协助或便利：

(1) When sourcing or operating in high-risk areas, AIKO will not tolerate, nor will it profit in any way from, provide any form of assistance, support, or facilitation to, the following acts:

- a. 最恶劣形式的童工(如危害性工作) ; The worst forms of child labor (e.g., hazardous work);
- b. 任何形式的酷刑、残忍、不人道或有辱人格的待遇; Any forms of torture, cruel, inhuman, or degrading treatment;
- c. 任何形式的强迫或强制劳动(以惩罚作为威胁榨取的任何个人的, 非自愿提供的劳动或者服务) ; Any forms of forced or compulsory labor (all work or service exacted from any individual under the menace of any penalty for which the person has not offered himself voluntarily);
- d. 其他严重侵犯和践踏人权的的行为, 如普遍的性暴力行为; Other gross human rights violations and abuses, such as widespread sexual violence;
- e. 战争罪或其他严重违反国际人道主义法的行为, 反人类罪或种族灭绝罪; War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide;
- f. 其他不符合“无冲突规范”的地地区的矿物产品, 如联合国安全理事会认定的在刚果民主共和国采矿造成侵犯人权, 环境恶化的矿产原料, 或卢旺达、乌干

达等产自刚果矿脉之矿物。Minerals from other areas that do not meet "conflict-free" standards, such as minerals from the Democratic Republic of the Congo (DRC) or adjoining countries identified by the United Nations Security Council as contributing to human rights abuses and environmental degradation through mining, or minerals originating from the DRC's mineral veins but produced in countries like Rwanda or Uganda.

(2) 如果爱旭有合理理由认定上游供应商存在以下行为：正从任何实施第 (1) 条所规定的严重侵权行为一方进行采购，或与该方存在关联，爱旭将立即中止或终止与该上游供应商的合作关系。

(2) If AIKO has reasonable grounds to believe that an upstream supplier is sourcing from, or linked to, any party committing serious abuses as defined in section (1), AIKO will immediately suspend or terminate the relationship with that upstream supplier.

### **3.2.2 关于直接或间接支持非国家武装团体 Direct or indirect support to non-state armed groups**

(3) 爱旭绝不容忍任何通过矿产资源开采、运输、贸易、处理或出口，为非国家武装团体提供直接或间接支持的行为。通过矿产资源开采、运输、贸易、处理或出口为非国家武装团体提供“直接或间接的支持”包括且不限于从非国家武装团体或其关联方购买矿产，向其支付费用，或以其他方式为其提供后勤支援或设备

等。这些武装团体或关联方包括：

(3) AIKO will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals. "Direct or indirect support" 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. These groups or affiliates may:

- a. 非法控制矿区，或以其他方式对运输路线、矿产资源交易地以及供应链的上游行为主体进行控制； Illegally control mine sites, transportation routes, points where minerals are traded, or upstream actors in the supply chain; and/or
- b. 并/或在矿区入口、通往矿区沿线或矿产资源交易地非法征税或者勒索钱财或自然资源； Illegally tax or extort money or minerals at mine site entrances, along transportation routes, or at points where minerals are traded; and/or
- c. 并/或对中间商、出口企业或国际贸易商非法征税或勒索。 Illegally tax or extort intermediaries, export companies, or international traders.

(4) 如果爱旭有理由认为，上游供应商从向非国家武装团体（见第（3）段中定义）提供直接或间接支持的任何一方进行采购，或与该方有关联，爱旭将立即中止或终止与该上游供应商的合作关系。

(4) If AIKO has reason to believe that an upstream supplier is

sourcing from, or is linked to, any party providing direct or indirect support to non-state armed groups (as defined in paragraph (3)), AIKO will immediately suspend or terminate the relationship with that upstream supplier.

### 3.2.3 关于公共或私人安全武装 Public or private security forces

(5) 爱旭同意根据第(10)段之规定, 杜绝向非法控制矿址、运输路线以及供应链上游行为主体; 在矿址入口、运输路线沿线或矿产交易点非法征税或索要钱财或矿产; 或者向中间商、出口企业或国际贸易者非法征税或进行勒索的公共或私人安全武装提供直接或间接支持。

(5) In accordance with the provisions of paragraph (10), AIKO commits to ending direct or indirect support to public or private security forces that illegally control mine sites, transportation routes, and upstream supply chain actors; illegally tax or extort money or minerals at mine site entrances, along transportation routes, or at points where minerals are traded; or illegally tax or extort intermediaries, export companies, or international traders.

(6) 爱旭认可, 矿址及/或其周边地区以及/或运输道路沿线的公共或私人安全武装的作用仅是维护法治, 包括保障人权、保护矿工、设备和设施安全、保护矿址或运输路线以使合法的开采和贸易不受干扰。

(6) AIKO recognizes that the role of public or private security forces

at mine sites and/or surrounding areas, and/or along transportation routes, should be to maintain the rule of law, including upholding human rights, protecting miners, equipment, and facilities, and securing mine sites or transportation routes to ensure legitimate mining and trade can proceed without interference.

(7) 若爱旭供应链上的任何企业与公共或私人安全武装签订合约，我们承诺，在此类合作的过程中，将严格遵守《安全与人权自愿原则》。具体而言，我们将会支持或采取措施运用筛查政策，确保实施过严重侵犯人权行为的个人或安全武装单位不被录用。

(7) If any company in AIKO's supply chain contracts public or private security forces, we commit, in the context of such relationships, to supporting or implementing screening policies to ensure that individuals or units of security forces that have been implicated in serious human rights abuses are not hired.

(8) 爱旭将采取措施支持中央或地方政府、国际组织和民间社会组织并与其开展合作，共同探索提高公共安全武装安保费用的透明度、相称性和问责性的解决方案。

(8) AIKO will support or take measures, in collaboration with central or local authorities, international organizations, and civil society organizations, to seek solutions for the transparency, proportionality, and accountability of payments made to public security forces for

their services.

(9) 爱旭将支持或采取措施，与当地政府、国际组织和民间社会组织开展互动，避免或最大限度地降低公共或私人安全武装驻扎在矿址给弱势群体带来的负面影响，尤其是对小作坊矿工的负面影响。

(9) AIKO will support or take measures, engaging with local governments, international organizations, and civil society organizations, to avoid or minimize the negative impacts of the presence of public or private security forces at mine sites on vulnerable groups, especially artisanal and small-scale miners.

(10) 如果爱旭发现在一定程度上存在此类风险，将根据企业在供应链上所处的具体位置，立即制定、采用和实施上游供应商及其他利益相关方风险管理计划，从而第（5）条所示的为公共或私人安全武装提供直接或间接支持的风险得到遏制或降低。如果风险管理计划实施六个月未起作用，我们将暂时停止或终止与上游供应商的合作关系。我们发现在一定程度上有可能存在违反第（8）段和第（9）段内容的行为的情况下，将采取同样的应对措施。

(10) If AIKO identifies a risk that such support is taking place, we will immediately design, adopt, and implement a risk management plan with the upstream supplier and other relevant stakeholders, appropriate to its position in the supply chain, to prevent or mitigate the risk of providing direct or indirect support to public or private security forces as outlined in paragraph (5). If the risk management

plan does not work within six months of implementation, we will suspend or terminate the relationship with the upstream supplier. The same approach will be applied if AIKO identifies a possible violation of paragraphs (8) and (9).

#### **3.2.4 关于行贿受贿及矿产原产地的欺诈性失实陈述 Bribery and fraudulent misrepresentation of mineral origin**

(11) 爱旭不会直接或间接地提出、承诺、进行或索要任何贿赂，并且抵制索贿；不会为了掩盖或伪造矿产资源原产地，虚报矿产资源开采、贸易、处理、运输、出口等活动应向政府缴纳的税收、费用和特许开采费而行贿。

(11) AIKO will not offer, promise, give, or demand any bribes, and will resist solicitation of bribes; nor will we bribe to cover up or falsify the origin of minerals, or to conceal payments made to governments for taxes, fees, or royalties related to mineral extraction, trade, processing, transport, and export.

#### **3.2.5 关于洗钱 Money laundering**

(12) 如果爱旭有理由认为，存在因开采、交易、处理、运输或出口在矿区入口、运输路线沿线、或上游供应商矿产资源交易地进行非法征税或勒索而得的矿产资源所引起或与之相关的洗钱风险，爱旭将支持或采取措施，为有效消除洗钱行为做出贡献。

(12) If AIKO identifies a risk of money laundering related to, or arising from, the extraction, trade, handling, transport, or export of minerals that are illegally taxed or extorted at mine site entrances, along transportation routes, or from upstream actors in the supply chain, AIKO will support or contribute to efforts to eliminate such money laundering.

### **3.2.6 关于向政府支付的税收、费用及特许费 Payments of taxes, fees, and royalties to governments**

(13) 爱旭将确保向政府支付所有高风险区域矿石开采、交易、出口相关的合法税收、费用和特许费，并且承诺根据企业在供应链上所处位置依照《采掘行业透明度行动计划》（EITI）中各项原则对此类支付进行披露。

(13) AIKO will ensure that all taxes, fees, and royalties related to mineral extraction, trade, and export from high-risk areas are paid to governments in accordance with applicable laws. We commit, according to our position in the supply chain, to disclosing such payments in line with the principles of the Extractive Industries Transparency Initiative (EITI).

### **3.2.7 关于对行贿受贿及矿产原产地的欺诈性失实陈述、洗钱及向政府支付的税收、费用、特许费的风险管理 Risk management regarding bribery, fraudulent misrepresentation, money laundering, and payments to governments**

(14) 根据企业在供应链上所处的具体位置，爱旭承诺与供应商、中央或地方政府机关、国际组织、民间社会以及受影响的第三方酌情进行合作，本着在合理的时间跨度内采取显著措施，防范或降低有负面影响的风险之目的，对绩效进行改善或跟踪。风险降低措施实施六个月未奏效，爱旭将中止或终止与上游供应商的合作关系，并启动替代供应来源。

(14) According to its position in the supply chain, AIKO commits to cooperating with suppliers, central or local governmental authorities, international organizations, civil society, and affected third parties, as appropriate, to improve performance or track progress with a view to preventing or mitigating adverse risks within a reasonable timeframe. If risk mitigation measures do not work within six months, AIKO will suspend or terminate the relationship with the upstream supplier and seek an alternative supply source.

### **3.2.8 关于职业健康与安全 Occupational health and safety**

(15) 在高风险地区开展采购或经营活动时，爱旭不会获利于、协助、便利于任何为其直接和/或间接雇员和/或在其生产现场的任何人员提供威胁到生命的职

业环境的一方，或从有该情况的任何一方进行采购或与该方存在关联。

(15) When sourcing or operating in high-risk areas, AIKO will not profit from, assist, or facilitate any party that provides life-threatening working conditions for its direct and/or indirect employees and/or any person present at its production sites, nor source from or be linked to any such party.

(16) 如果爱旭有合理理由认为上游供应商提供威胁到生命的职业环境，或从有该情况的任何一方采购或存在关联，爱旭将立即中止或中断与该供应商的合作，并启动替代供应来源。

(16) If AIKO has reasonable grounds to believe an upstream supplier provides life-threatening working conditions, or sources from or is linked to such a party, AIKO will immediately suspend or terminate cooperation with that supplier and seek an alternative supply source.

### 3.2.9 关于童工 Child labor

(17) 在开展采购或开展经营活动时，爱旭将不会雇佣低于东道国法律或法规规定的最低工作年龄的儿童，不会获利于、协助或为低于东道国法律或法规规定的最低工作年龄的儿童就业提供便利，不会从有该情形的任何一方采购或与其有关联。如果东道国没有相关的法律或法规规定，最低工作年龄为 16 周岁。

(17) In sourcing or operations, AIKO will not employ children below the minimum working age defined by host country laws or

regulations, nor profit from, assist, or facilitate the employment of such children. We will not source from or be linked to any party involved in such practices. If the host country lacks relevant laws or regulations, the minimum working age is 16.

(18) 如果爱旭有合理理由认为该风险存在，即上游供应商存在该情形，或者从存在上述第（17）段所规定的情形的任何一方进行采购或与该方有关联，爱旭将立即中止或中断与该供应商的合作。

(18) If AIKO has reasonable grounds to believe such a risk exists—that an upstream supplier is involved in such practices or sources from/is linked to a party involved in the practices defined in paragraph (17) AIKO will immediately suspend or terminate cooperation with that supplier.

### **3.2.10 关于土地权利、排放和小作坊 Land rights, emissions, and artisanal and small-scale mining**

(19) 在高风险地区进行采购活动时，爱旭不会获利于、协助、便利于任何给周围土壤、空气和水资源的状况造成重大不利影响，任何严重违反当地相关法律法规的一方或从有该情况的任何一方进行采购或与该方存在关联。爱旭将支持上游供应商采取措施定期评估、降低采矿活动对土壤、空气、水资源造成的不利影响。

(19) When sourcing in high-risk areas, AIKO will not profit from, assist, or facilitate any party that causes significant adverse impacts

on surrounding soil, air, and water resources, or seriously violates relevant local laws and regulations, nor source from or be linked to any such party. AIKO will support upstream suppliers in taking measures to regularly assess and mitigate adverse environmental impacts of mining activities.

(20) 爱旭不参与、不容忍，也不受益于在未获得当地人和土著人自由、事先、知情同意或在非法获得法定所有权、租赁权、特许权或许可证，或违反国内法的土地上开采矿产资源。

(20) AIKO will not engage in, tolerate, or benefit from mineral extraction on land acquired without the Free, Prior, and Informed Consent (FPIC) of local communities and indigenous peoples, or acquired illegally, or in violation of domestic law regarding ownership, lease, concession, or licensing.

(21) 爱旭不参与、不容忍，也不受益于从不尊重、不保护当地人和土著人文化和遗产，或损害当地人和土著人传统文化和遗产，以及在法定保护区的采矿作业中采购矿产资源或与该方有关联。

(21) AIKO will not engage in, tolerate, or benefit from sourcing minerals from, or being linked to, mining operations that do not respect or protect the culture and heritage of local communities and indigenous peoples, or that harm their traditional culture and heritage, including within legally protected areas.

(22) 爱旭特别关注与小作坊或小规模采矿工相关的强迫劳动、童工、不安全工作条件、不受控危险化学品使用和其他重大环境影响的风险，鼓励上游供应商积极寻求与开采区的小作坊或小规模采矿工建立生产关系，同时推动小作坊或小规模采矿工生产与工作环境改善。

(22) AIKO pays particular attention to risks associated with artisanal and small-scale mining (ASM), such as forced labor, child labor, unsafe working conditions, uncontrolled use of hazardous chemicals, and other significant environmental impacts. We encourage upstream suppliers to actively seek to establish sourcing relationships with ASM miners in extraction areas while promoting improvements in their production and working conditions.

(23) 如果爱旭有合理理由认为存在此类风险，爱旭将根据企业在供应链上所处的具体位置，立即制定、采用和实施上游供应商及其他利益相关方风险管理计划，从而防范或降低侵害上述第(19)-(22)段所规定的具体风险。如果风险管理计划实施未奏效，本公司将立即中止或终止与该上游供应商的合作关系。

(23) If AIKO identifies such risks, we will immediately design, adopt, and implement a risk management plan with the upstream supplier and other relevant stakeholders, appropriate to its position in the supply chain, to prevent or mitigate the specific risks outlined in paragraphs (19)-(22). If the risk management plan does not work, AIKO will immediately suspend or terminate the relationship with

that upstream supplier.

#### **4 负责任采购与冲突矿产管理方式 Approach to Responsible Procurement and Conflict Minerals Management**

爱旭在全球供应链管理中承诺采取负责任的采购方式，确保采购活动符合相关法律、道德与社会责任标准，并最大程度地降低社会和环境风险。为此，爱旭将采取以下管理措施：

AIKO is committed to adopting a responsible procurement approach in global supply chain management, ensuring procurement activities comply with relevant legal, ethical, and social responsibility standards, and minimizing social and environmental risks. To this end, AIKO will implement the following management measures:

##### **4.1 政策与管理体系建设 Policy and Management System Establishment**

在战略与可持续发展委员会的监督指导下，由采购部负责推进矿产供应链负责任管理。爱旭已建立涵盖风险管控、透明度体系及申诉机制的管理架构，要求供应商签署包含不使用冲突矿产要求的《爱旭供应商行为准则》，并依托外部专业工具面向光伏板块所供材料（包含相关矿产）的直接供应商，开展矿产供应链负责任管理尽职调查。

Under the supervision and guidance of the Strategy and Sustainable Development Committee, the Procurement Department is responsible for promoting responsible management of the mineral supply chain. AIKO has established a management framework covering risk control, transparency systems, and grievance mechanisms. We require suppliers to sign the AIKO Supplier Code of Conduct, which includes requirements against using conflict minerals. Relying on external professional tools, we conduct due diligence for responsible mineral supply chain management targeting direct suppliers of materials (including relevant minerals) for the photovoltaic sector.

#### **4.2 风险识别与评估 Risk Identification and Assessment**

本公司不直接从冶炼厂或精炼厂购买或采购原材料或精炼矿产，且《OECD 尽职调查指南》（第三版）中也认识到下游公司很难通过冶炼厂或精炼厂识别上游参与，这意味着想要确保供应链不涉及冲突风险将面临较大的挑战。本公司致力于使用标准的方式确定供应链中涉及到的冶炼厂或精炼厂，以此确定相关矿产是否来自受冲突影响和高风险地区。

AIKO does not purchase or source raw materials or refined minerals directly from smelters or refiners. The OECD Due Diligence Guidance (Third Edition) also recognizes that downstream companies face

significant challenges in identifying upstream actors beyond smelters/refiners, making it difficult to ensure a conflict-free supply chain. AIKO is committed to using standardized methods to identify smelters/refiners in the supply chain to determine if relevant minerals originate from conflict-affected and high-risk areas.

为应对上述挑战与风险，爱旭将通过现场审核、文件审核、供应链追溯、对直接与间接供应商开展尽职调查、审核报告等方式持续收集信息，确保及时识别潜在的风险源。

To address these challenges and risks, AIKO will continuously gather information through on-site audits, document reviews, supply chain traceability, due diligence on direct and indirect suppliers, and audit reports to ensure timely identification of potential risk sources.

采购部负责汇总矿产供应链涉及到的冶炼厂或精炼厂、矿产类型及来源地等相关信息，通过数据库对比等方式，确认矿产供应链是否涉及冲突风险。爱旭重点关注未参与 RMAP 认证的冶炼厂或精炼厂，以及矿产供应链负责任管理尽职调查证实存在冲突风险的供应商。

The Procurement Department is responsible for consolidating information on smelters/refiners, mineral types, and source locations involved in the mineral supply chain. Through methods such as database comparisons, we confirm whether the mineral supply chain involves conflict risks. AIKO focuses on smelters/refiners not

participating in RMAP certification, and suppliers identified through due diligence as posing conflict risks.

#### **4.3 风险管理与缓解措施 Risk Management and Mitigation Measures**

对于已识别出的风险,爱旭将协助供应商制定并实施有效的风险管理和整改计划。供应商必须采取切实可行的措施,解决风险问题,并向爱旭报告其整改进展。对未能采取必要纠正措施的供应商,爱旭将采取适当的管理措施,包括暂停或终止合作。

For identified risks, AIKO will assist suppliers in developing and implementing effective risk management and corrective action plans. Suppliers must take practical measures to address the risks and report their progress to AIKO. For suppliers failing to take necessary corrective actions, AIKO will implement appropriate management measures, including suspension or termination of cooperation.

#### **4.4 尽职调查与审计 Due Diligence and Auditing**

为了确保所有矿物和原材料以合规且人道的方式获得,爱旭将实施四步尽职调查流程:

To ensure all minerals and raw materials are obtained compliantly and humanely, AIKO will implement a four-step due diligence process:

- 建立完善的内外部管理系统，确保有效的供应链监督；
- Establish robust internal and external management systems to ensure effective supply chain oversight;
- 识别和评估供应链中的风险，特别是与冲突矿产和人权侵害相关的风险
- Identify and assess risks within the supply chain, particularly those related to conflict minerals and human rights abuses;
- 要求供应商提供详细的供应链背景信息，确保采购来源符合国际道德和法律标准；
- Require suppliers to provide detailed supply chain background information to ensure sourcing complies with international ethical and legal standards;
- 支持并推动第三方独立审计，以确保供应链的透明度和合规性。
- Support and promote independent third-party audits to ensure supply chain transparency and compliance.

#### 4.5 年度报告与信息披露 Annual Reporting and Information Disclosure

爱旭鼓励供应商每年披露与负责任采购相关的信息，包括供应链的尽职调查情况、风险管理措施及整改计划。同时，爱旭每年通过公开渠道披露年度负责任采购与冲突矿产信息，包括风险风险、缓解措施及供应商合规情况。

AIKO encourages suppliers to annually disclose information related to responsible procurement, including due diligence status, risk

management measures, and corrective plans. Simultaneously, AIKO annually discloses Responsible Procurement and Conflict Minerals information through public channels, including identified risks, mitigation measures, and supplier compliance status.

#### 4.6 培训与能力建设 Training and Capacity Building

爱旭将加强对供应商的培训与支持，共同提高冲突矿产识别、风险管理和供应链追溯的能力。

AIKO will enhance training and support for suppliers to jointly improve capabilities in conflict mineral identification, risk management, and supply chain traceability.

### 5 申诉机制 Grievance Mechanism

爱旭提供顺畅的沟通和申诉机制，以保障本政策的有效实施。爱旭的所有员工、供应商、合作伙伴、客户及其他利益相关者，若怀疑或发现有违反本政策的行为，均可通过以下渠道以实名或匿名的方式上报进行申诉。爱旭承诺会依法依规、客观调查、公正处理所有申诉案件，并及时反馈结果。爱旭还根据相关规定保护申诉人和/或报告人免受报复，确保他们不因申诉和/或报告而受到威胁、恐吓、骚扰或任何其他形式的不公平待遇。

AIKO provides accessible communication and grievance channels to

ensure the effective implementation of this policy. All AIKO employees, suppliers, partners, customers, and other stakeholders who suspect or discover violations of this policy can file a grievance through the following channels, either anonymously or by name. AIKO commits to investigating all grievance cases according to laws and regulations, objectively and impartially, and providing feedback in a timely manner. AIKO also protects complainants and/or reporters from retaliation in accordance with relevant regulations, ensuring they are not subjected to threats, intimidation, harassment, or any other form of unfair treatment due to filing a grievance and/or report.

- 电子信箱: [Aikoprocurement@aikosolar.com](mailto:Aikoprocurement@aikosolar.com)
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- Mailing Address: Procurement Department, R&D Building, No. 699 Haopai Road, Yiwu City, Zhejiang Province, China (Receiver: Procurement Department)

## 6 修订、审阅机制 Revision and Review Mechanism

该政策由爱旭解释与修订, 确保本政策的有效性和时效性, 并根据公司实际运营

情况与法律法规的变化，一般情况下修订或更新的周期为每年1次。本政策以中文和英文版本制备，若中英文版本不一致，以中文版本为准。

This policy shall be interpreted and revised by AIKO. To ensure its effectiveness and timeliness, and in response to changes in the company's actual operations and relevant laws and regulations, this policy will generally be revised or updated annually. This policy is prepared in both Chinese and English versions. In case of any discrepancy between the two versions, the Chinese version shall prevail.