

Controlled

# 冲突矿产承诺与管理政策

## Conflict Minerals Commitment and Management Policy

SolarSpace  
中润光能

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## 一. 冲突矿产承诺 **Conflict Minerals Commitment**

江苏中润光能科技股份有限公司及其子公司（以下简称“中润光能”）支持采购非冲突（conflict-free）原物料，以践行企业社会责任，促进产业链的可持续发展与人文关怀。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）等国际公约和行业倡议，以负责任的方式采购产品中使用的可能会来自受冲突影响和高风险地区（CAHRA）的矿产（简称“冲突矿产”），包括但不限于钽、锡、钨、金（合称“3TG”）等，以减少该类矿物开采和贸易过程中对人权、环境和有关地区社会造成的负面影响。

SolarSpace Technology Co., Ltd. and its subsidiaries (collectively as “SolarSpace”) support the procurement of conflict-free raw materials to fulfill corporate social responsibility and promote sustainable development and humanitarian values across the supply chain. The company is committed to complying with international conventions and industry initiatives such as the United Nations Global Compact, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs), and the Responsible Minerals Initiative (RMI). SolarSpace is dedicated to responsibly sourcing minerals that may originate from CAHRAs, including but not limited to tantalum, tin, tungsten, and gold (collectively as “3TG”), to reduce negative impacts on human rights, the environment, and local communities associated with the extraction and trade of such minerals.

## 二. 冲突矿产管理政策 **Conflict Minerals Management Policy**

### 2.1 政策依据 **Policy Basis**

严格遵循经济合作与发展组织（OECD）发布的《受冲突影响地区和高风险地区矿产供应链尽职调查指南》。

Strictly follow the *Due Diligence Guidance for Mineral Supply Chains in Conflict-Affected and High-Risk Areas* issued by the Organization for Economic Co-operation and Development (OECD).

### 2.2 核心目标 **Core Objective**

公司致力于建立并维护透明、高效的冲突矿产管理机制，积极对供应商开展尽职调查，确保供应链中的锡、钽、钨、金（合称“3TG”）及其他矿产不被用于资助刚果民主共和国及其周边国家的武装冲突或武装团体，不涉及侵犯人权、环境破坏及其他社会责任违规行为，促进供应链的可持续发展和道德采购，推动行业健康良性发展。

SolarSpace is committed to establishing and maintaining a transparent and efficient conflict minerals management system. The company actively conducts due diligence on its suppliers to ensure that minerals such as tin, tantalum, tungsten, and gold (collectively known as “3TG”), as well as other minerals in the supply chain, are not used to finance armed conflicts or armed groups in the Democratic Republic of the Congo and its neighboring countries, nor are they involved in human rights violations, environmental damage, or other social responsibility breaches. SolarSpace promotes sustainable supply chains and ethical sourcing to foster healthy and responsible industry development.

### 2.3 具体措施 Implementation Measures

#### 2.3.1 供应商承诺与筛选 Supplier Commitment & Screening

- ✧ 制定《供应商无冲突矿产采购政策》。
- ✧ 要求供应商签署《不使用冲突矿产承诺书》。
- ✧ 要求供应商完成冲突矿产报告模板（CMRT - Conflict Minerals Reporting Template）调查问卷。
- ✧ 将供应商在冲突矿产方面的表现纳入供应商现场审核及调查内容。
- ✧ Develop a Conflict-Free Minerals Procurement Policy for suppliers.
- ✧ Require suppliers to sign a Conflict Minerals-Free Commitment Letter.
- ✧ Require suppliers to complete the Conflict Minerals Reporting Template (CMRT) questionnaire.
- ✧ Include suppliers' performance on conflict minerals in on-site audits and investigations.

#### 2.3.2 持续监控与执行 Ongoing Monitoring & Enforcement

- ✧ 开展供应商年度调查工作（包括更新 CMRT）。

- ◇ 评估供应商冲突矿山的采购和使用状况。
- ◇ Conduct annual supplier surveys (including updating the CMRT)
- ◇ Assess suppliers' procurement and usage status of conflict minerals.

### 2.3.3 采取严厉措施 Take Strict Measures

若供应商违反公司关于冲突矿山的管理要求(如无法证明其来源合规、拒绝配合调查等), 公司将暂停或终止合作, 并要求其承担由此产生的法律责任及经济损失。

In the event that a supplier fails to comply with the company's conflict minerals management requirements—such as being unable to verify the compliance of mineral sources or refusing to cooperate with related investigations—the company reserves the right to suspend or terminate the business relationship and hold the supplier responsible for any legal liabilities and financial damages incurred as a result.

### 2.3.4 风险管理与供应链延伸 Risk Management & Supply Chain Extension

- ◇ 识别和分析供应商在矿产采购面存在的风险点。
- ◇ 赋能供应商: 通过提供信息、培训或支持, 帮助供应商建立或完善其自身的冲突矿产管理体系。
- ◇ 要求传导: 要求供应商将中润光能的负责任矿产采购原则向其自身的上游供应商传递, 将负责任采购的要求延伸至更深的供应链层级。
- ◇ Identify and analyze risk in suppliers' mineral procurement processes.
- ◇ Empower suppliers: Provide information, training, or support to help suppliers establish or improve their own conflict minerals management systems.
- ◇ Requirement cascade: Require suppliers to communicate SolarSpace's responsible mineral sourcing principles to their upstream suppliers, extending responsible sourcing requirements deeper into the supply chain.

中润光能将坚持采购非冲突原物料的原则, 与合作伙伴携手, 以严格管理与透明行动, 确保矿产来源合规, 共筑负责任的全球矿产供应链, 践行社会责任。

SolarSpace remains committed to the principle of sourcing conflict-free raw materials. Through close collaboration with its partners, the company upholds strict management and transparent practices



to ensure the responsible sourcing of minerals. Together, we aim to build a responsible global mineral supply chain and fulfill our corporate social responsibility.

江苏中润光能科技股份有限公司

SolarSpace Technology Co., Ltd.

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