



RESPONSIBLE MINERAL PROCUREMENT MANAGEMENT POLICY

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LONGi Green Energy Technology Co., Ltd. (hereinafter referred to as "LONGi"), as a global leader in photovoltaic product manufacturing, is committed to advancing responsible clean energy development. Ethical procurement is a fundamental pathway to achieving this vision.

To standardize compliance and responsible practices in our mineral supply chain, identify, prevent, mitigate, and eliminate risks associated with conflict financing, severe human rights violations, unethical business conduct, and other adverse impacts, LONGi hereby establishes this Responsible Mineral procurement Management Policy. This policy ensures responsible procurement, meets customer expectations, and supports LONGi's sustainable business growth.

This policy, established under the framework of LONGi's Human Rights Policy (HRP), specifies the management requirements for mineral procurement and applies to LONGi and all its subsidiaries, branches, and affiliated entities. We commit to managing our mineral supply chain in accordance with the 2nd Edition of *China's Guidance for Responsible Mineral Supply Chain Due Diligence*, the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (3rd Edition) (hereinafter referred to as the "OECD Guidance"), Section 1502 of the *U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act*, the *EU Conflict Minerals Regulation*, and other relevant laws, regulations, and industry standards.

As a fundamental principle of responsible mineral management, LONGi commits to neither procure nor use minerals that directly or indirectly finance armed groups in Conflict-Affected and High-Risk Areas (CAHRAs) or contribute to conflict and human rights abuses. This policy applies to LONGi Green Energy Technology Co., Ltd., its subsidiaries, and controlled entities, covering mineral supply chains including but not limited to Tungsten, Tin, Tantalum, Gold, Cobalt, Mica, Copper, Aluminum, and Silicon. Furthermore, we require all suppliers to uphold the same commitment and collaborate with us in implementing due diligence measures. To ensure compliance, LONGi will incorporate this requirement into all supplier contracts and/or agreements.

Guided by these principles, we commit to implementing the following responsible mineral management systems:



1. **Compliance with Applicable Laws, Regulations, and Standards:** We adhere to all relevant international norms, domestic laws and regulations, and industry standards governing mineral supply chain compliance in every jurisdiction where we operate.
2. **Integration into Sustainable Development Management:** Responsible mineral supply chain management is a core component of our corporate sustainability strategy. Under the guidance of the Board Strategy and ESG Committee, the Group Strategy Management Committee drives related planning and business initiatives. With support from Compliance, Quality, and R&D departments, the Supply Chain Management Center's procurement teams lead the implementation of these efforts.
3. **Implementing Supply Chain Due Diligence:** We require suppliers providing products containing relevant minerals to sign the *LONGi Supplier Code of Conduct*, which includes provisions prohibiting the use of conflict minerals. Additionally, we conduct annual supply chain due diligence to identify medium- and high-risk suppliers for corrective action, perform risk analysis and mitigation based on risk levels, and seek alternative supply sources when necessary to facilitate risk mitigation. In accordance with supply chain due diligence results and with reference to requirements in *OECD Guidance Annex II*, our commitments for mineral supply chain risk management include:

3.1 Serious Violations Related to Mineral Extraction, Transportation, or Trade

When conducting procurement or business operations in high-risk areas, LONGi will neither tolerate nor profit from, aid, assist, or facilitate any party involved in:

- a. Worst forms of child labor: (The worst forms of child labor are defined in Article 3 of the International Labour Organization's Worst Forms of Child Labour Convention, 1999 (No. 182). Clause (d) specifies one such form as: "work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.");
- b. Any form of torture, cruelty, inhuman, or degrading treatment;
- c. Forced or compulsory labor, defined as all work or service extracted under threat of penalty for which the person has not volunteered;
- d. Other grave human rights violations, including widespread sexual violence;
- e. War crimes, serious breaches of international humanitarian law, crimes against humanity, or



genocide;

- f. Minerals from areas failing to meet "conflict-free" standards, such as those identified by the UN Security Council as contributing to human rights abuses or environmental degradation in the Democratic Republic of Congo (DRC), or minerals from Congolese ore sources in Rwanda, Uganda, or other regions.

If LONGi has reasonable grounds to believe that an upstream supplier is procured from or associated with parties engaged in the above violations, we will immediately suspend or terminate cooperation with that supplier and initiate alternative procurement.

3.2 Direct or Indirect Support to Non-State Armed Groups

LONGi does not tolerate any direct or indirect support to non-state armed groups through the mining, transportation, trade, processing, or export of minerals. "Direct or indirect support" includes, but is not limited to: purchasing minerals from non-state armed groups or their affiliates, making payments to such groups, or providing logistical support, equipment, or other benefits. These armed groups or affiliates include those that:

- a. Illegally control mining sites, transportation routes, mineral trading locations, or upstream actors in the supply chain; and/or
- b. Impose illegal taxes or extort money or natural resources at mine entrances, along transportation routes, or at mineral trading sites; and/or
- c. Extort illegal taxes or payments from intermediaries, exporters, or international traders.

If LONGi has reasonable grounds to believe that an upstream supplier sources from or is linked to any party providing direct or indirect support to non-state armed groups, LONGi will immediately suspend or terminate cooperation with that supplier and initiate alternative procurement arrangements.

3.3 Public or Private Security Forces

- a. LONGi commits to preventing any direct or indirect support to public or private security forces that illegally control mining sites, transportation routes, or upstream actors in the supply chain, impose illegal taxes or extort money or minerals at mine entrances, along transportation routes, or at mineral trading points, or extort illegal payments from intermediaries, exporters, or international traders.



- b. LONGi recognizes that the role of public or private security forces at mining sites, surrounding areas, or along transportation routes must be strictly limited to upholding the rule of law. This includes protecting human rights, ensuring the safety of miners, equipment, and facilities; and securing mining sites or transport routes to enable lawful mining and trade without disruption.
- c. Where LONGi or any entity in our supply chain contracts with public or private security forces, we commit to—or will require—compliance with the *Voluntary Principles on Security and Human Rights*. Specifically, we will support or implement screening policies to ensure that individuals or security units with known records of serious human rights violations are not employed.
- d. LONGi will support or take measures to collaborate with central/local governments, international organizations, and civil society to improve transparency, proportionality, and accountability in public security expenditure.
- e. We will support or engage with local governments, international organizations, and civil society to avoid or minimize adverse impacts of public/private security forces stationed at mining sites on vulnerable groups—particularly artisanal and small-scale miners (ASM)—where minerals in the supply chain are sourced through ASM.

If LONGi identifies risks of violations under (a), we will immediately develop and implement a risk management plan with upstream suppliers and stakeholders to contain or reduce such risks. If the plan fails within six months, we will suspend or terminate cooperation with the supplier. The same applies to potential breaches of (d) and (e).

3.4 Bribery and Misrepresentation in Mineral Origin

LONGi strictly prohibits any form of bribery or fraudulent misrepresentation regarding mineral origin. Specifically, we will not, directly or indirectly, offer, promise, give, or solicit bribes, nor will we tolerate extortion. We will not engage in bribery to conceal or falsify the origin of minerals, or to underreport taxes, fees, royalties, or other payments owed to governments for mining, trading, processing, transporting, or exporting mineral resources.

3.5 Money Laundering

LONGi will support and implement measures to effectively combat money laundering risks associated with minerals obtained through illegal taxation or extortion at mining sites, transportation routes, or



upstream supplier trading locations.

3.6 Government Payments: Taxes, Fees, and Royalties

LONGi commits to paying all legally required taxes, fees, and royalties related to mineral extraction, trade, and export in high-risk areas. In accordance with our position in the supply chain, we further pledge to disclose these payments following the principles of the Extractive Industries Transparency Initiative (EITI).

3.7 Risk Management: Corruption, Misrepresentation, Money Laundering, and Government Payments

Based on our specific position in the supply chain, LONGi commits to collaborating with suppliers, central/local government authorities, international organizations, civil society, and affected third parties as appropriate. We aim to implement measurable improvements and monitoring mechanisms to prevent or mitigate negative impacts within reasonable timeframes. Should risk mitigation measures prove ineffective after six months of implementation, LONGi will suspend or terminate cooperation with upstream suppliers and initiate alternative procurement arrangements.

3.8 Occupational Health and Safety

In our procurement and production activities, LONGi will not benefit from, assist, or facilitate any party that maintains life-threatening working conditions for its direct/indirect employees or any personnel at its production sites, nor will we source from or maintain relationships with such parties.

Should LONGi have reasonable grounds to believe an upstream supplier maintains life-threatening working conditions or sources from parties with such practices, we will immediately suspend or terminate cooperation with that supplier and activate alternative supply sources.

3.9 Child Labor

LONGi maintains a zero-tolerance stance on child labor. In our procurement and business operations, we will not employ children below the minimum working age established by host country laws/regulations; We will not benefit from, assist, or facilitate the employment of underage children; and we will not source from or maintain relationships with any party engaged in such practices. Where host country laws are absent, the minimum working age is 16 years.

If LONGi has reasonable grounds to believe an upstream supplier employs underage workers, or



sources from parties engaged in child labor, we will immediately suspend or terminate cooperation with that supplier.

4. **Smelter/Refiner Management:** We will regularly identify smelters/refiners in our supply chain and verify their mineral sources and industry certification status. Where LONGi has reasonable grounds to believe risks exist, we will conduct on-site audits—either directly or through authorized third parties—as necessary.
5. **Enhancing Supply Chain Transparency:** We commit to continuously improving supply chain transparency by regularly disclosing our responsible mineral management performance in the LONGi Sustainability Report.
6. **Capacity Building & Stakeholder Engagement:** Through internal training and external communication, we ensure all employees and suppliers understand and comply with this policy through targeted training and engagement. We also work with suppliers to establish responsible mineral management and monitoring mechanisms, strengthening their risk management capabilities throughout the mineral supply chain.
7. **Grievance & Reporting Mechanism:** To ensure effective implementation of this policy, LONGi provides accessible channels for employees, suppliers, partners, customers, and other stakeholders to anonymously or publicly raise concerns or report potential violations through:
 - Longi Qingfeng Complaint and Report Acceptance Center WeChat mini program
 - Sunshine Longi WeChat official account
 - Tel: 0086-029-84193391, 18089282003
 - Email: audit@longi.com; compliance@longi.com
 - Letters and face-to-face complaints and reports, address: No. 8369, Shangyuan Road,
 - Economic and Technological Development Zone, Weiyang District, Xi'an City, Audit Supervision Center of Longi Green Energy Technology Co., Ltd.

We conduct a comprehensive review of this policy at least once a year based on updates to relevant laws and regulations, as well as the content of the company's policies. When necessary, we will update it in a timely manner. We look forward to working together with all our partners to contribute to the sustainability of the global supply chain and achieve the overarching goal of responsible mineral sourcing!

LONGi Green Energy Technology Co., Ltd.

July 8, 2025

