可持续供应链尽职调查政策

Sustainable Supply Chain Due Diligence Policy

一、 前言

I. Preamble

秉承“少消耗，多发电”的企业使命，践行“奋斗、创新、专注”的发展之道，苏州中来光伏新材股份有限公司（以下简称“我们”“公司”“中来股份”）作为一家专业从事太阳能技术产品研发与制造的光伏企业，我们深耕光伏行业，聚焦绿色能源产业链，致力于成为具备国际竞争力的世界一流光伏产品制造商和智慧能源服务商。伴随企业规模和影响力的不断扩大，我们也深知公司运营以及供应链活动可能对环境与社会（包括人权）产生深远影响。

Adhering to the mission of “Same Sunshine, More Value” and pursuing the development philosophy of “Diligence, Innovation, and Focus”, Jolywood (Suzhou) Sunwatt Co., Ltd. (hereinafter referred to as “We”, “the Company”, or “Jolywood”), as a photovoltaic enterprise specializing in the R&D and manufacturing of solar technology products, is deeply committed to cultivating the photovoltaic industry and focusing on the green energy value chain, striving to become an internationally competitive, world-class photovoltaic product manufacturer and smart energy service provider. As our business scale and influence continue to grow, we are fully aware of the significant impacts that our operations and supply chain activities may have on the environment and society, including human rights.

我们承诺全面践行国际公认的环境、社会与治理（ESG）理念，打造覆盖供应链可持续管理体系，推动负责任的商业实践落地生效，促进企业与环境、社会的协调共生。为此，我们制定了《可持续供应链尽职调查政策》（以下简称“本政策”），明确公司在供应链管理中识别、评估、预防和减轻潜在环境与社会（包括人权）风险的方式，体现了我们在推动清洁能源发展的同时，积极构建可持续供应链的决心。

We commit to comprehensively implementing internationally recognized Environmental, Social and Governance (ESG) principles, establishing an integrated sustainable supply chain management system, and driving responsible business practices to deliver tangible outcomes. We endeavor to foster sustainable harmony among the Company, society, and the environment. To this end, we have established the *Sustainable Supply Chain Due Diligence Policy* (hereinafter referred to as “the Policy”), which sets forth our approach to identifying, assessing, preventing, and mitigating potential environmental and social (including human rights) risks in supply chain management. The Policy reflects our determination to actively build a sustainable supply chain while advancing the development of clean energy.

二、 总则
II. General Provisions

政策目标
Policy Objective

本政策旨在建立健全的供应链尽职调查体系，系统识别、预防和减轻公司在原材料采购、生产制造、物流交付等环节可能造成的环境与社会（包括人权）相关风险。通过有效的风险管理与合规措施，推动供应链上下游共同履行社会责任，促进企业与合作伙伴的可持续发展。

The Policy aims to establish a robust supply chain due diligence system to systematically identify, prevent, and mitigate potential environmental and social (including human rights) risks that may arise from the Company’s raw material procurement, manufacturing, logistics, and delivery processes. Through effective risk management and compliance measures, the Company promotes the fulfillment of social responsibilities across the upstream and downstream of the supply chain and fosters the sustainable development of both the Company and its partners.

适用范围
Scope of Application

本政策适用于公司及所属分子公司，包括泰州中来光电科技有限公司、江苏中来光能科技有限公司、山西中来光能电池科技有限公司等，以及与公司业务相关的各类活动的所有一级供应商、承包商及业务合作伙伴，涵盖原材料采购、加工、生产、销售等全部供应链环节，并重点关注涉及高风险地区的供应链活动。

The Policy applies to the Company and its subsidiaries and branch offices, including Jolywood (Taizhou) Solar Technology Co., Ltd., Jolywood (Jiangsu) Solar Technology Co.,Ltd., Jolywood (Shanxi) Solar Technology Co., Ltd., and all tier-one suppliers, contractors, and business partners engaged in various activities related to the Company’s business. The Policy covers all supply chain stages, including raw material procurement, processing, production, and sales, with a particular focus on supply chain activities involving high-risk regions.

政策依据
Policy Basis

本政策的制定参考并遵循以下与公司主营业务相关的国际标准与法规，包括但不限于：

The Policy is developed with reference to and in compliance with the following international standards and regulations related to the Company's main business activities, including but not limited to:

- 《国际人权宪章》（包括《世界人权宣言》、《公民权利和政治权利国际公约》及《经济、社会及文化权利国际公约》），联合国人权事务高级专员办事处（OHCHR）
- *International Bill of Human Rights* (comprising the *Universal Declaration of Human Rights*, the *International Covenant on Civil and Political Rights*, and the *International Covenant on Economic, Social and Cultural Rights*), Office of the United Nations High Commissioner for Human Rights (OHCHR)
- 《联合国商业与人权指导原则》，联合国
- *United Nations Guiding Principles on Business and Human Rights*, United Nations
- 《跨国企业行为准则》，经济合作与发展组织（OECD）
- *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct,* Organisation for Economic Co-operation and Development (OECD)
- 《关于多国企业和社会政策原则的三方宣言》，国际劳工组织（ILO）
- *Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy,* International Labour Organization (ILO)
- 《负责任商业行为尽职调查指南》，经济合作与发展组织（OECD）
- *OECD Due Diligence Guidance for Responsible Business Conduct*, Organisation for Economic Co-operation and Development (OECD)
- 《受冲突影响和高风险地区矿产负责任供应链尽职调查指南》，经济合作与发展组织（OECD）
- *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, Organisation for Economic Co-operation and Development (OECD)
- 《欧盟企业可持续发展尽职调查指令》（EU）2024/1760（CSDDD）
- *Corporate Sustainability Due Diligence Directive* (EU) 2024/1760 (CSDDD)
- 《德国供应链尽职调查法》（LkSG）
- *German Supply Chain Due Diligence Act* (LkSG)

治理责任

Governance Responsibility

总经理办公会对本政策的实施与监督负最终责任，法务部作为牵头单位，统筹供应链尽职调查工作，采购管理部及公司各 BU 采购部、质量管理部及质量部、人力资源部、证券部、信息部等部门共同参与，承担风险识别、预防措施执行、申诉与补救机制落实，以及可持续供应链尽职调查相关信息披露等职责。各 BU 与部门主要职责如下：

The General Managers Office bears ultimate responsibility for the implementation and supervision of the Policy. The Legal Department serves as the leading department, coordinating supply chain due diligence efforts. The Procurement Management Department and the procurement departments of each Business Unit (BU), the Quality Management Department and the Quality Departments, the Human Resources Department, the Securities Department, the Information Department, and other relevant departments jointly participate in and assume responsibilities for risk identification, execution of preventive measures, implementation of grievance and remediation mechanisms, and disclosure of information related to sustainable supply chain due diligence. The primary responsibilities of each BU and department are as follows:

总经理办公会：

General Manager's Office：

- 审阅并批准《可持续供应链尽职调查政策》。
- Review and approve the *Sustainable Supply Chain Due Diligence Policy*.
- 监督可持续供应链尽职调查工作的整体实施情况、年度关键进展与重要发现，对外批准发布可持续供应链尽职调查相关关键信息。
- Oversee the overall implementation of sustainable supply chain due diligence, including annual key progress and significant findings, and approve the external release of key information related to sustainable supply chain due diligence.

法务部：

Legal Department：

- 制定和定期评估与审查公司 ESG 战略、供应链尽职调查政策及配套管理手册、管理程序与表单，跟踪法规、行业标准等外部变化情况，及时修订制度。
- Develop, periodically assess, and review the Company's ESG strategy, supply chain due diligence policy, and supporting management manual, procedures, and forms; track external changes such as laws, regulations, and industry standards; and revise the system in a timely manner.
- 牵头推进供应链尽职调查工作，包括供应商现场审核、违规事件调查及整改监督，并协调外部客户、机构的对接工作。

- Lead the implementation of supply chain due diligence, including supplier on-site audits, investigation of non-compliance incidents, supervision of corrective actions, and coordinate with external customers and institutions.
- 组织开展 ESG 与尽职调查相关培训，提升内部人员及供应商的能力建设水平。
- Organize and conduct ESG and due diligence-related training to enhance the capacity-building of internal personnel and suppliers.
- 将供应链尽职调查相关 ESG 条款纳入合同模板，审核合同合规性，确保供应商协议符合公司政策及相关法规要求。
- Integrate ESG clauses related to supply chain due diligence into contract templates, review contract compliance, and ensure that supplier agreements align with the Company's policies and applicable regulatory requirements.
- 为供应链尽职调查工作提供法律咨询与合规支持，参与合同及供应商争议处理，确保政策执行的合法性。
- Provide legal consultation and compliance support for supply chain due diligence, participate in contract and supplier dispute resolution, and ensure the legality of policy implementation.
- 接收供应链尽职调查过程中所产生的投诉与申诉，负责统一登记，编号入档并确认受理，并对投诉人的申诉进行复核处理，完成相应记录。
- Receive complaints and grievances arising from the supply chain due diligence process, register them in a centralized manner, assign case numbers for filing, confirms acceptance, review and process the complainant's grievances, and complete corresponding records.

采购管理部及公司各 BU 采购部：

Procurement Management Department and Procurement Departments of each BU:

- 管理供应商准入与退出流程，确保新供应商引入及合作终止均符合公司采购及 ESG 要求。
- Manage the supplier admission and exit processes, ensuring that both the introduction of new suppliers and the termination of cooperation comply with the Company's procurement and ESG requirements.
- 根据供应商基础信息、运营数据及业务重要性，对供应商开展分类管理（I类、II类以及III、IV、V类），并由各 BU 采购部分发并收集《供应商 KYS 风险评估表》（Know Your Supplier, KYS），完成供应商风险高、中、低风险等级划分。
- Conduct supplier classification management (Category I, Category II, and Categories III, IV, V) based on supplier basic information, operational data, and business criticality. The procurement departments of each BU shall distribute and

collect *the Supplier KYS (Know Your Supplier) Risk Assessment Form* and complete the classification of suppliers into high, medium, and low risk levels.

- 承担与供应商的日常沟通窗口职责，收集供应商 ESG 信息、风险反馈，并协助推动整改要求的落实。
- Serve as the primary point of contact for daily communication with suppliers, collect supplier ESG information and risk feedback, and assist in driving the implementation of corrective actions.

质量管理部及质量部：

Quality Management Department and Quality Departments：

- 针对公司采购的核心原材料，绘制供应链地图。
- Map the supply chain for the Company's core raw materials.
- 将 ESG 相关标准（如有害物质管理、职业健康与安全等）纳入供应商审核范围，完善《供应商 ESG 审核表》，并以此为据组织并执行供应商现场审核，统筹供应商 ESG 审核安排，对审核发现的问题提出整改要求，由质量部或质量管理部跟踪供应商整改落实情况。
- Integrate ESG-related criteria (such as hazardous substance management, occupational health and safety, etc.) into the scope of supplier audits, improve the *Supplier ESG Audit Form*, and on that basis, organize and conduct supplier on-site audits, coordinate supplier ESG audit arrangements, and propose corrective actions for the audit findings. The Quality Departments or the Quality Management Department shall track the implementation of corrective actions by suppliers.
- 建立和维护供应链审核档案，将审核结果用于风险评估、供应商分级管理及后续评价。
- Establish and maintain supply chain audit records, and use audit results for risk assessment, supplier classification management, and subsequent evaluations.
- 将供应商 ESG 审核表现及整改表现作为供应商持续管理和合作决策提供依据。
- Use supplier ESG audit performance and corrective action performance as a basis for ongoing supplier management and cooperation decisions.

人力资源部：

Human Resources Department：

- 就供应链尽职调查中涉及雇佣合规的事项（如劳动合同管理、工作时间、薪酬福利、平等就业、童工/强迫劳动等）提供专业意见，为供应商 ESG 审核和整改提供专业支持。

- Provide professional opinions on matters related to employment compliance in supply chain due diligence (such as labor contract management, working hours, compensation and benefits, equal employment, child labor/forced labor, etc.), and offer professional support for supplier ESG audits and corrective actions.
- 建立并维护内部员工沟通与反馈渠道，负责员工雇佣方面的意见收集、问题受理及申诉处理，保障信息顺畅与问题有效解决。
- Establish and maintain internal employee communication and feedback channels, responsible for collecting opinions, accepting complaints, and handling grievances related to employment matters, ensuring smooth information flow and effective resolution of issues.

证券部：

Securities Department：

- 保持与政府、社区、媒体及公众的沟通与合作，及时向外部利益相关方传达可持续供应链建设情况。
- Maintain communication and cooperation with government authorities, communities, media, and the public, and promptly communicate the progress of sustainable supply chain development to external stakeholders.
- 收集外部反馈，向内部相关部门提供意见参考，支持供应链 ESG 政策的有效执行。
- Collect external feedback and provide reference opinions to relevant internal departments to support the effective execution of supply chain ESG policies.

信息部：

Information Department：

- 建设并维护供应链可追溯信息系统，确保供应商数据、审核信息及整改记录的完整性和安全性。
- Develops and maintains the supply chain traceability information system, ensuring the integrity and security of supplier data, audit information, and corrective action records.
- 为各部门供应链尽职调查工作的信息化管理提供技术支持，保障政策执行的可追踪与高效实施。
- Provides technical support for the digital management of supply chain due diligence across all departments, ensuring traceability and efficient implementation of the Policy.

三、 尽职调查实施措施

III. Due Diligence Implementation Measures

识别与评估负面影响

Identification and Assessment of Adverse Impacts

公司将定期开展风险识别与评估，覆盖环境、社会（包括人权）等关键领域。通过收集供应链信息和开展风险分析，公司能够及时发现可能存在的实际或潜在负面影响。

The Company shall regularly conduct risk identification and assessment covering key areas such as environment and society (including human rights). By collecting supply chain information and performing risk analysis, the Company is able to timely identify actual or potential adverse impacts that may exist.

确定与排序负面影响

Identification and Prioritization of Adverse Impacts

在识别出多项风险时，公司将综合考虑其严重性、发生可能性等因素，对实际和潜在的负面影响进行优先级排序。通过科学排序，公司能够将资源集中投入到影响最重大、发生可能性最高的风险领域，确保尽职调查措施的有效性。

When multiple risks are identified, the Company shall prioritize actual and potential adverse impacts by comprehensively considering factors such as their severity and likelihood of occurrence. Through systematic prioritization, the Company can concentrate resources on risk areas with the most significant impacts and highest likelihood of occurrence, thereby ensuring the effectiveness of its due diligence measures.

预防与减轻负面影响

Prevention and Mitigation of Adverse Impacts

针对识别出的风险，公司将制定并落实相应的预防和改进措施，包括修订采购政策、完善供应商管理要求、加强能力建设和培训。对于重大风险，公司将采取必要的管理措施，确保问题得到有效控制和整改。

For identified risks, the Company shall develop and implement appropriate prevention and improvement measures, including revising procurement policies, enhancing supplier management requirements, and strengthening capacity-building and training. For significant risks, the Company shall take necessary management measures to ensure that issues are effectively controlled and rectified.

补救与恢复措施

Remediation and Restoration Measures

当公司发现供应链中已造成实际负面影响时，将及时启动补救程序。补救措施包括纠正违规行为、恢复受影响人员或社区的合法权益等，并通过改进管理流程防止类似情况再次发生。公司承诺在补救过程中确保相关措施的公平、公正和透明。

When the Company identifies that actual adverse impacts have been caused in the supply chain, it shall promptly initiate remediation procedures. Remediation measures include rectifying non-compliance, restoring the legitimate rights and interests of affected individuals or communities, while preventing recurrence through improved management processes. The Company commits to ensuring that relevant measures throughout the remediation process are fair, equitable, and transparent.

追踪与监督结果

Monitoring and Tracking of Results

公司建立持续监督机制，定期跟进和评估相关措施的实施效果。通过内部审查、第三方审核等方式，确保预防和改进措施得到有效落实，并对结果进行记录和反馈。

The Company shall establish a continuous monitoring mechanism to regularly follow up on and evaluate the effectiveness of relevant measures. Through internal reviews, third-party audits, and other means, the Company shall ensure that prevention and improvement measures are effectively implemented, with results documented and feedback provided.

申诉与补救机制

Grievance and Remediation Mechanism

公司设立公开透明的申诉渠道，保障员工、供应商及其他利益相关方能够及时表达关切或提出投诉。所有申诉将得到公正处理，公司承诺针对合理诉求提供适当的补救措施，包括补偿、恢复或其他必要的改进行动。

The Company shall establish open and transparent grievance channels to ensure that employees, suppliers, and other stakeholders can promptly raise concerns or file complaints. All grievances shall be handled impartially, and the Company commits to providing appropriate remedial measures for legitimate claims, including compensation, restoration, or other necessary improvement actions.

利益相关方沟通

Stakeholder Communication

公司将积极开展与各类利益相关方的沟通，定期发布尽职调查工作的进展和结果。通过合作与对话，公司致力于在供应链中建立长期互信关系，共同推动责任经营和可持续发展。

The Company shall actively engage in communication with various stakeholders and periodically publish the progress and results of its due diligence efforts. Through cooperation and dialogue, the Company is committed to building long-term mutual trust within the supply chain and jointly promoting responsible business practices and sustainable development.

四、 政策更新和审查
IV. Policy Updates and Reviews

本政策及相关配套制度将进行持续审查和动态更新，至少每 24 个月或有重大变更时更新，以确保其符合相关法律法规、国际准则以及行业最佳实践的最新要求。公司保留在必要时部分或全部修订、暂停或废止本政策及相关管理制度的权利。本政策由法务部定期组织评估与审查，重大调整需报经总经理办公会批准后实施。所有修订内容将及时通知全体员工，并通过公司内部信息系统发布，确保信息透明和政策的有效执行。

The Policy and its supporting systems shall undergo continuous review and dynamic updates, with revisions made at least every 24 months or upon significant changes, ensure alignment with the latest requirements of applicable laws, regulations, international standards, and industry best practices. The Company reserves the right to revise, suspend, or repeal the Policy and related management systems in whole or in part when necessary. The Policy shall be periodically assessed and reviewed by the Legal Department, and any material adjustments shall be submitted to the General Manager’s Office for approval prior to implementation. All revisions shall be promptly communicated to all employees and published through the Company’s internal information system to ensure transparency and effective execution of the Policy.