

利益相关方沟通管理程序

Stakeholder Communication Management Procedure

1. 范围和目的

1. Scope and Purpose

1.1 目的

1.1 Purpose

本程序旨在建立公司（指“苏州中来光伏新材股份有限公司”）与利益相关方的有效沟通机制，确保在尽职调查及日常经营中充分听取利益相关方意见，识别并管理实际或潜在的环境、社会（包括人权）、公司治理相关风险，促进负责任的商业行为与可持续供应链建设。通过系统化沟通，公司得以及时了解风险、推动业务伙伴改进，并支持公司整体的可持续发展目标实现。

This procedure is intended to establish an effective communication mechanism between the Company (“Jolywood (Suzhou) Sunwatt Co., Ltd.”) and its stakeholders, ensuring that stakeholder opinions are fully considered in the course of due diligence and daily operations, identifying and managing actual or potential environmental, social (including human rights), and corporate governance risks, and promoting responsible business practices and sustainable supply chain development. Through systematic communication, the Company is able to promptly understand risks, drive improvements among business partners, and support the achievement of its overall sustainable development goals.

1.2 范围

1.2 Purpose

本程序适用于公司及所有下属分子公司，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在可持续供应链尽职调查环节中与利益相关方的沟通与管理。

This procedure applies to the Company and all its subsidiaries and branch companies, including Jolywood (Taizhou) Solar Technology Co., Ltd., Jolywood (Jiangsu) Solar Technology Co., Ltd., Jolywood (Shanxi) Solar Technology Co., Ltd., etc., in respect of communication and management with stakeholders in the course of the sustainable supply chain due diligence process.

1.3 制度管理与修订

1.3 System Management and Revision

本制度由公司法务部、证券部牵头制定与修订，相关职能部门配合执行。制度版本如需更新，应根据法规变化或管理需要，按程序报批后发布实施。

This system is drafted and revised by the Company's Legal Department and Securities Department as the leading departments, with the cooperation and execution of relevant functional departments. If a version update is required, it shall be submitted for approval in accordance with relevant procedures based on regulatory changes or management needs, and then published and implemented.

2. 沟通原则

2. Communication Principles

透明性: 在法律允许范围内, 向利益相关方提供全面、相关的信息, 保证沟通公开透明。

Transparency: The Company shall provide comprehensive and relevant information to stakeholders within the bounds permitted by law, ensuring that communication is open and transparent.

回应性: 利益相关方有权合理地请求公司提供补充信息, 公司应在合理期限内以清晰、易懂的形式予以回应; 若拒绝, 应书面说明理由。

Responsiveness: Stakeholders have the right to reasonably request supplementary information from the Company. The Company shall respond in a clear and comprehensible manner within a reasonable timeframe; if a request is denied, the Company shall provide written reasons for the refusal.

参与性: 利益相关方应能够充分表达意见, 公司应在制定或调整供应链政策、开展重大供应商管理行动、处理重大违规或整改事项以及对外披露关键信息等关键决策环节中, 应充分考虑其意见。

Participation: Stakeholders shall be able to fully express their opinions. The Company shall duly consider their input in key decision-making processes, including but not limited to: formulating or adjusting supply chain policies, undertaking major supplier management actions, handling significant violations or rectification matters, and disclosing critical information to external parties.

保护性: 确保所有参与沟通的利益相关方不会因表达意见而受到任何形式的报复或惩罚。公司承诺采取严格保密或匿名机制, 并在沟通渠道中明确告知参与者其匿名权利及保护措施。

Protection: The Company shall ensure that no stakeholder participating in communication is subject to any form of retaliation or punishment for expressing their opinions. The Company is committed to implementing strict confidentiality or anonymous mechanisms, and shall clearly inform participants of their right to

anonymity and the protective measures available through the communication channels.

包容性：公司承诺所有沟通机制均面向所有利益相关方平等开放，确保各类利益相关群体均有平等机会参与沟通并表达意见，不设任何不合理的参与壁垒。

Inclusiveness: The Company undertakes that all communication mechanisms shall be equally open to all stakeholders, ensuring that all stakeholder groups have equal opportunities to participate in communication and express their opinions, without imposing any unreasonable barriers to participation.

3. 沟通环节

3. Communication Stage

公司在以下尽职调查环节中应主动开展利益相关方沟通：

The Company should proactively engage with stakeholders during the following due diligence stages:

- **风险识别与优先排序：**在识别、评估和排序潜在或实际不利影响时。
- **Risk Identification and Prioritization:** When identifying, assessing, and prioritizing potential or actual adverse impacts.
- **预防与纠正措施：**在制定或更新预防及纠正行动计划时。
- **Prevention and Corrective Measures:** When developing or updating prevention and corrective action plans.
- **业务关系调整：**在决定暂停或终止重要业务合作关系前。
- **Adjustment of Business Relationships:** Before deciding to suspend or terminate significant business partnerships.
- **补救措施：**在制定和执行不利影响的补救措施时。
- **Remediation Measures:** When formulating and implementing remedies for adverse impacts.
- **指标设定与监测：**在制定和修订定性、定量监测指标时。
- **Indicator Setting and Monitoring:** When developing and revising qualitative and quantitative monitoring indicators.

4. 利益相关方识别与分类

4. Stakeholder Identification and Classification

4.1 识别原则

4.1 Identification Principles

在利益相关方识别过程中，公司遵循以下原则：

In the process of stakeholder identification, the Company adheres to the following principles:

- **受影响性：**识别因公司运营或供应链活动而受到直接或间接影响的群体，例如：所在社区居民；公司雇员及其家属；供应商及其员工。
- **Affectedness:** Identify groups that are directly or indirectly impacted by the Company's operations or supply chain activities, such as: residents of local communities; company employees and their families; suppliers and their workers.
- **影响力：**识别对公司运营和发展具有决策、监督或引导作用的群体，例如：投资者；政府及监管机构；行业协会、非政府组织及媒体。
- **Influence:** Identify groups that exercise decision-making, supervisory, or guiding roles over the Company's operations and development, such as: investors; government and regulatory bodies; industry associations, non-governmental organizations, and media.
- **全面性：**确保涵盖所有可能受到公司活动影响或对公司产生实质性影响的群体，避免遗漏。
- **Comprehensiveness:** Ensure coverage of all groups that may be affected by the Company's activities or that have a material impact on the Company, avoiding omissions.

4.2 分类管理

4.2 Categorized Management

在识别完成后，公司将利益相关方分为以下类别，并采取差异化的沟通方式：

Upon completion of identification, the Company classifies stakeholders into the following categories and adopts differentiated communication approaches:

- **核心利益相关方：**受影响程度高，或对公司核心业务具有关键影响。
管理方式：优先安排沟通，确保高频互动和高透明度的信息共享。
- **Core Stakeholders:** Groups with a high degree of affectedness or that have a critical impact on the Company's core business.
Management Approach: Prioritize engagement to ensure high-frequency interaction and highly transparent information sharing.
- **一般利益相关方：**受影响程度较低，对公司运营影响有限。
管理方式：通过定期沟通和信息公开保持联系，适度回应其需求。
- **General Stakeholders:** Groups with a lower degree of affectedness and limited impact on the Company's operations.
Management Approach: Maintain contact through regular communication and information disclosure, and respond to their needs appropriately.
- **弱势群体：**在沟通过程中可能处于不利地位，如低收入工人、少数族群、儿童、外来务工人员或受教育程度较低的群体。
管理方式：提供额外支持，例如使用简明易懂的语言、提供翻译或口译服

务、改善沟通渠道可及性，并确保其意见能够被充分表达与重视。

- **Vulnerable Groups:** Groups that may be at a disadvantage during the communication process, such as low-income workers, ethnic minorities, children, migrant workers, or individuals with lower levels of education.

Management Approach: Provide additional support, such as using plain and accessible language, offering translation or interpretation services, improving the accessibility of communication channels, and ensuring that their views can be fully expressed and valued.

5. 沟通方式

5. Communication Methods

5.1 常用渠道

5.1 Common Channels

公司在日常沟通中可采用多种方式，包括问卷调查、个人或集体访谈、专题研讨会、电子邮箱、热线电话、供应商大会以及现场审核等，以确保沟通的多样性和可及性。

The Company may employ a variety of methods in its day-to-day communications, including questionnaires, individual or group interviews, thematic workshops, email, hotlines, supplier conferences, and on-site audits, to ensure diversity and accessibility in engagement.

5.2 沟通频率

5.2 Communication Frequency

根据利益相关方类型与事项重要性确定。对核心利益相关方至少每年开展一次定期沟通；其他利益相关方按业务需要沟通；重大事项可随时组织专项沟通。

Determined based on stakeholder type and the significance of the matter. Regular communication with core stakeholders shall be conducted at least once per year; other stakeholders shall be engaged as required by business needs; ad hoc communication may be organized at any time for material matters.

5.3 重大事项沟通

5.3 Communication on Material Matters

对于涉及公司战略、重大环境、社会影响或供应链风险等重要事项，应采取更为正式的沟通方式，如书面函件、面对面交流或多方会议，确保信息传递的充分性与决策的透明度。

For important matters involving corporate strategy, significant environmental or social impacts, or supply chain risks, more formal communication methods shall be adopted, such as written correspondence, face-to-face exchanges, or multi-party meetings, to ensure adequacy of information transmission and transparency in decision-making.

5.4 员工沟通

5.4 Employee Communication

与员工及其代表的沟通应严格遵守国家劳动法律法规、工会制度及相关集体协议，保障员工的合法权益和参与权。

Communication with employees and their representatives shall strictly comply with national labor laws and regulations, trade union systems, and relevant collective agreements, safeguarding employees' lawful rights and interests and their right to participate.

5.5 外部倡议

5.5 External Initiatives

在适当情况下，公司可参与行业协会或多方利益相关方倡议，以提升沟通效率和协同效果。但对于公司自身员工及其代表，公司仍需直接开展沟通，不得完全依赖外部机制替代。

Where appropriate, the company may participate in industry association or multi-stakeholder initiatives to enhance communication efficiency and synergistic outcomes. However, with respect to the company's own employees and their representatives, the company must still engage in direct communication and shall not rely entirely on external mechanisms as a substitute.

6. 投诉与申诉机制

6. Complaint and Grievance Mechanism

6.1 投诉渠道

6.1 Complaint Channels

- 投诉人可通过邮箱、热线电话、官网或现场意见箱提交投诉，选择实名或匿名。
- Complainants may submit complaints via email, hotline, the company website, or on-site suggestion boxes, choosing either real-name or anonymous submission.
- 所有信息严格保密，保护投诉人及相关人员，避免任何报复。
- All information shall be kept strictly confidential to protect complainants and relevant parties, preventing any retaliation.
- 定期向利益相关方披露投诉机制和处理效果。
- The complaint mechanism and handling outcomes shall be regularly disclosed to stakeholders.

投诉部门：法务部

Complaint Department: Legal Department

投诉邮箱：jubao@jolywood.cn

Complaint Email: jubao@jolywood.cn

6.2 投诉受理与登记

6.2 Complaint Receipt and Registration

- 由法务部负责统一登记投诉，编号入档并确认受理。
- The Legal Department shall be responsible for centrally registering complaints, assigning reference numbers for filing, and confirming receipt.
- 受理范围包括环境、社会（包括人权）、商业道德及合规风险等问题。
- The scope of acceptance covers issues related to environment, society (including human rights), business ethics, and compliance risks.

6.3 调查与处理

6.3 Investigation and Handling

- 调查流程：包括初步核实、资料收集、陈述听取、现场核查及风险评估。
- Investigation Process: Includes preliminary verification, evidence collection, statement hearings, on-site inspections, and risk assessment.
- 时限要求：一般事项应在 20 个工作日内完成调查；对于重大或复杂事项可适当延长期限，但延长时间及次数应在调查报告中说明。
- Timeframe Requirements: General matters should be investigated within 20 working days; for material or complex matters, the timeframe may be appropriately extended, provided that the extension duration and number of extensions are explained in the investigation report.
- 结论与报告：根据调查结果，将投诉认定为“成立”“部分成立”或“不成立”，并形成书面调查报告，按规定存档备查。
- Conclusion and Reporting: Based on investigation findings, complaints shall be classified as “substantiated,” “partially substantiated,” or “unsubstantiated,” and a written investigation report shall be prepared and filed for future reference in accordance with applicable regulations.

6.4 申诉与复核

6.4 Appeal and Review

- 投诉人可在收到书面调查报告之日起 5 个工作日内申诉，并说明申诉理由及提供相关证据，法务部作为复核团队在 20 个工作日内完成复核。
- The complainant may file an appeal within 5 working days from the date of receipt of the written investigation report, stating the grounds for appeal and providing relevant evidence. The Legal Department shall serve as the review team and complete the review within 20 working days.
- 复核结果为最终结论，需要通过书面的方式通知投诉人。

- The review outcome shall be final and must be notified to the complainant in writing.

6.5 补救与改进

6.5 Remediation and Improvement

- 对违规行为采取停止侵害、赔偿、恢复原状等措施。
- Remedial measures shall be taken for violations, including cessation of infringement, compensation, and restoration to the original state.
- 对系统性或重大问题，依情况采取修订制度、加强培训、整改供应商等措施，防止相同问题再次发生。
- For systemic or material issues, measures such as revising policies, enhancing training, and rectifying suppliers shall be taken as appropriate to prevent recurrence of the same problems.
- 持续评估补救措施有效性。
- The effectiveness of remedial measures shall be continuously assessed.

7. 保障措施

7. Safeguard Measures

7.1 消除障碍

7.1 Removing Barriers

公司在沟通和投诉处理过程中，应主动识别可能存在的障碍，并提供必要支持，例如语言翻译、灵活的时间安排、技术工具和渠道保障，确保所有利益相关方均能平等参与。

In the process of communication and complaint handling, the Company shall proactively identify potential barriers and provide necessary support, such as language translation, flexible scheduling, technical tools, and channel accessibility, to ensure that all stakeholders can participate on an equal basis.

7.2 保密与匿名

7.2 Confidentiality and Anonymity

公司建立保密与匿名机制，确保投诉人或参与沟通的各方不因表达意见而受到任何形式的报复或不利影响，切实保护相关方的合法权益。

The Company shall establish confidentiality and anonymity mechanisms to ensure that complainants or parties participating in communications do not suffer any form of retaliation or adverse consequences as a result of expressing their views, thereby effectively protecting the lawful rights and interests of relevant parties.

7.3 记录与反馈

7.3 Recording and Feedback

公司设立完整的记录和反馈机制，对沟通过程、投诉处理及结果进行全程记录和存档，并在适当范围内反馈处理情况，确保全过程的透明度和可追溯性。

The Company has established a comprehensive recording and feedback mechanism, under which the entire process of communication, complaint handling, and corresponding outcomes are fully documented and archived. The handling status is also fed back within an appropriate scope, ensuring transparency and traceability throughout the entire process.

8. 持续改进

8. Continuous Improvement

公司将定期对本程序的执行情况进行评估，并结合实际运行经验和最新法规要求，持续优化利益相关方沟通方式和投诉管理机制，确保其有效性与可适用性。

The Company will periodically evaluate the implementation of this procedure, and based on actual operational experience and the latest regulatory requirements, continuously optimize the methods of stakeholder communication and the complaint management mechanism, so as to ensure their effectiveness and applicability.