

## 可持续采购政策 Sustainable Procurement Policy

### 政策声明 Policy Statement

为响应全球可持续发展倡议，践行联合国全球契约十项原则，落实国家绿色供应链建设要求，将环境保护、社会责任与商业道德理念深度融入采购全流程，推动供应链上下游构建低碳、透明、负责的生态网络，保障公司长期战略价值与可持续发展能力，特制定本政策。

本政策适用于固德威技术股份有限公司及合并财务报表的分、子公司的所有采购活动，并要求供应商、服务商、承包商及其他业务合作伙伴积极遵守本政策或同等政策要求。

In response to the global sustainable development initiative, implement the ten principles of the United Nations Global Compact, and implement the national requirements for green supply chain construction, this policy is hereby formulated to deeply integrate the concepts of environmental protection, social responsibility and business ethics into the entire procurement process, promote the construction of a low - carbon, transparent and responsible ecological network among upstream and downstream supply chain partners, and safeguard the company's long - term strategic value and sustainable development capabilities.

This policy applies to all procurement activities of GoodWe Technologies Co., Ltd. and its branches and subsidiaries included in the consolidated financial statements. Suppliers, service providers, contractors and other business partners are required to actively comply with this policy or equivalent policy requirements.

### 职责治理与责任分配 Responsibility Governance and Allocation

公司建立“董事会-ESG 战略与管理委员会-ESG 执行层”的三级可持续采购治理体系，确保政策有效落地。

The company has established a three - level sustainable procurement governance system of "Board of Directors - ESG Strategy and Management Committee - ESG Executive Layer" to ensure the effective implementation of policies.

董事会负责审批可持续采购政策及年度战略目标；监督管理层对政策的执行与落实情况；审议可持续采购重大事项及资源配置方案。

The Board of Directors is responsible for approving sustainable procurement policies and annual strategic goals; supervising the management's implementation and implementation of policies; and reviewing major matters and resource allocation plans for sustainable procurement.

管理层（CEO 及分管副总）负责制定可持续采购年度实施计划；协调跨部门资源，解决政策执行中的重大问

题；向董事会汇报可持续采购绩效及改进方向。

The management (CEO and deputy general managers in charge) is responsible for formulating the annual implementation plan for sustainable procurement; coordinating cross - departmental resources to solve major problems in policy implementation; and reporting sustainable procurement performance and improvement directions to the Board of Directors.

供应链 ESG 合规管理部门负责牵头政策的制定、修订与解读；建立可持续采购评价指标体系，开展绩效评估；组织供应商 ESG 能力培训与赋能活动；对接联合国全球契约组织等外部机构，跟踪行业最佳实践；负责验证供应商产品的环保合规性；参与供应商 ESG 绩效审核。

The Supply Chain ESG Compliance Management Department is responsible for taking the lead in the formulation, revision, and interpretation of policies; establishing a sustainable procurement evaluation index system and conducting performance evaluations; organizing ESG capacity training and empowerment activities for suppliers; connecting with external institutions such as the United Nations Global Compact and tracking industry best practices; verifying the environmental compliance of suppliers' products; and participating in the ESG performance review of suppliers.

采购部门作为政策执行部门，将可持续要求融入采购全流程；实施供应商筛选、准入、考核及动态管理；推动采购数据与 ESG 管理系统对接，确保信息透明；负责验证供应商产品的质量安全性，提供质量维度评估意见。

As the policy - implementing department, the Procurement Department integrates sustainable requirements into the entire procurement process; implements supplier screening, access, assessment, and dynamic management; promotes the connection between procurement data and the ESG management system to ensure information transparency; verifies the quality and safety of suppliers' products and provides evaluation opinions from the quality dimension.

供应链管理部门负责优化物流、仓储等环节的绿色运营方案；协助收集供应商碳足迹及循环利用相关数据；推动供应链协同平台的可持续功能升级。

The Supply Chain Management Department is responsible for optimizing green operation plans for logistics, warehousing, and other links; assisting in collecting data related to suppliers' carbon footprints and recycling; and promoting the sustainable function upgrade of the supply chain collaboration platform.

法务部门负责审核采购合同中的可持续条款合法性；处理可持续采购相关的法律纠纷与合规风险。

The Legal Department is responsible for reviewing the legality of sustainable clauses in procurement contracts; and handling legal disputes and compliance risks related to sustainable procurement.

供应商遵守本政策及采购合同中的可持续要求；如实提供 ESG 相关数据与证明材料；持续改进环境、社会及治理绩效。

Suppliers shall comply with the sustainable requirements in this policy and procurement contracts; truthfully provide ESG - related data and supporting materials; and continuously improve

environmental, social, and governance performance.

## 采购中的环境保护

### Environmental Protection in Procurement

优先选择通过环境管理体系认证的供应商，制定绿色供应商准入标准，将环境合规证明（如排污许可证、环评批复等）、清洁生产水平、碳管理能力列为核心准入条件，对高污染、高环境风险供应商实施“一票否决”机制。每年对核心供应商开展环境绩效审核，每两年对非核心供应商进行一次抽样审核，并建立供应商环境信用档案。

Give priority to selecting suppliers that have passed the environmental management system certification, and formulate access standards for green suppliers. List environmental compliance certificates (such as pollution discharge permits, environmental impact assessment approvals, etc.), cleaner production levels, and carbon management capabilities as core access conditions, and implement a ‘one-vote veto’ mechanism for high-pollution and high-environmental-risk suppliers. Conduct environmental performance audits on core suppliers annually, conduct sampling audits on non-core suppliers once every two years, and establish environmental credit files for suppliers.

优先采购获得环境标志认证、节能产品认证的原材料及设备，严禁采购列入《环境保护综合名录》的“高污染、高环境风险”产品。要求供应商采用绿色包装，使用可循环、可降解材料，杜绝过度包装，并将包装材料回收率纳入供应商考核指标。推动供应商开展生态设计，以减少产品全生命周期的能源消耗与污染物排放，鼓励零部件进行回收循环利用。

Give priority to purchasing raw materials and equipment that have obtained environmental label certification and energy-saving product certification. It is strictly prohibited to purchase “high-pollution and high-environmental-risk” products listed in the Comprehensive List of Environmental Protection. Require suppliers to use green packaging, use recyclable and degradable materials, eliminate excessive packaging, and include the packaging material recovery rate in the supplier assessment indicators. Promote suppliers to carry out ecological design to reduce energy consumption and pollutant emissions throughout the product life cycle, and encourage the recycling of parts.

与核心供应商联合开展碳足迹核算，构建产品全生命周期碳追溯体系；优先选用采用新能源运输工具、优化运输路线的物流服务商，降低运输环节的碳排放；建立采购废弃物回收处理流程，促进原材料边角料等可回收资源的循环利用。

Conduct joint carbon footprint accounting with core suppliers to build a carbon traceability system for the entire product life cycle; give priority to selecting logistics service providers that use new energy transportation tools and optimize transportation routes to reduce carbon emissions in the transportation process; establish a procurement waste recycling and treatment process to promote

the recycling of recyclable resources such as raw material scraps.

以 2023 年为基准，至 2030 年，通过 ISO14001 体系认证的核心供应商占比需达到 98%以上；以 2023 年为基准，至 2030 年，供应商绿色包装使用率需达到 80%以上；至 2030 年，物流环节单位货物碳排放相较于基准年（2023 年）需下降 $\geq 15\%$ 。

Taking 2023 as the baseline, by 2030, the proportion of core suppliers certified by the ISO14001 system should reach over 98%; taking 2023 as the baseline, by 2030, the utilization rate of green packaging by suppliers should reach over 80%; by 2030, the carbon emissions per unit of goods in the logistics process should be reduced by  $\geq 15\%$  compared with the baseline year (2023).

## 采购中的社会责任实践

### Social Responsibility Practices in Procurement

优先选择通过 SA8000 体系认证的供应商。在采购活动中，要求供应商严格遵守劳动法律法规，严禁使用童工、强迫劳动及实施歧视性用工行为，确保员工享有合理薪酬、休息休假以及职业健康保护。推动供应商建立员工申诉机制，定期开展劳工权益自查，并将相关记录向公司备案。

Prioritize suppliers that have passed the SA8000 system certification. In procurement activities, require suppliers to strictly abide by labor laws and regulations, strictly prohibit the use of child labor, forced labor, and discriminatory employment practices, and ensure that employees enjoy reasonable compensation, rest and leave, and occupational health protection. Encourage suppliers to establish an employee grievance mechanism, conduct regular self - inspections of labor rights, and file relevant records with the company.

优先选择通过 ISO45001 体系认证的供应商，供应商需建立完善的安全生产管理制度，配备必要的安全防护设施，定期开展安全培训与应急演练。对涉及高危作业的供应商（如物流运输、设备安装），需提供有效的安全资质证明及事故预防方案，近 3 年发生重大安全事故的供应商不得准入。

Prioritize suppliers that have passed the ISO45001 system certification. Suppliers need to establish a sound work safety management system, be equipped with necessary safety protection facilities, and regularly conduct safety training and emergency drills. For suppliers involved in high - risk operations (such as logistics transportation and equipment installation), they need to provide valid safety qualification certificates and accident prevention plans. Suppliers that have had major safety accidents in the past three years shall not be admitted.

以 2023 年为基准，到 2030 年确保核心供应商劳工权益合规审核覆盖率达到 100%，供应商行为准则签署率达到 100%；以 2023 年为基准到 2030 年供应商安全生产培训覆盖率达到 100%；

Based on the year 2023, by 2030, ensure that the compliance audit coverage of labor rights of core suppliers reaches 100%, and the signing rate of the supplier code of conduct reaches 100%. Based on the year 2023, by 2030, the coverage of work safety training for suppliers reaches 100%.

## 采购中的商业道德实践

### Business Ethics Practices in Procurement

禁止采购人员与供应商发生任何形式的利益输送，包括收受回扣、礼品、宴请等；采购流程全程公开透明，关键环节实行多人复核制。

Purchasing personnel are prohibited from engaging in any form of interest transfer with suppliers, including accepting kickbacks, gifts, and invitations to banquets. The entire procurement process shall be open and transparent, and a multi-person review system shall be implemented for key links. 采购招标过程严格遵循公平、公正、公开原则，严禁设置排斥潜在供应商的歧视性条款；与供应商签订诚信合作协议，明确双方在知识产权保护、商业秘密保密等方面的责任，严禁侵犯第三方知识产权的行为。

The procurement bidding process shall strictly follow the principles of fairness, impartiality, and openness. It is strictly prohibited to set discriminatory terms that exclude potential suppliers. A good - faith cooperation agreement shall be signed with suppliers, clearly defining the responsibilities of both parties in intellectual property protection, trade secret confidentiality, etc. Any act of infringing on the intellectual property rights of third parties is strictly prohibited.

供应商需提供合法的经营资质证明，确保在财务、税务等方面合规运营；严禁与涉及腐败、洗钱、恐怖融资等违法违规行为的供应商开展合作，定期开展供应商合规背景调查。

Suppliers are required to provide legal business qualification certificates to ensure compliant operations in finance, taxation, etc. It is strictly prohibited to cooperate with suppliers involved in illegal and irregular activities such as corruption, money - laundering, and terrorist financing. Regular compliance background checks on suppliers shall be carried out.

以 2023 年为基准，到 2030 年确保每年采购人员廉洁培训覆盖率达到 100%。

Based on the year 2023, by 2030, it is necessary to ensure that the coverage rate of integrity training for purchasing personnel reaches 100% every year.

## 负责任的供应链管理

### Responsible Supply Chain Management

固德威秉持负责任的供应链管理理念，坚决禁止从冲突地区采购矿产资源，涵盖但不限于黄金、锡、钽、钨等关键矿产品类。为从源头把控合规性，公司要求所有供应商提供详尽的矿产来源证明文件，通过严格核查确保所采购矿产均源自非冲突及高风险区域，切实规避矿产采购可能间接助长武装冲突的风险。

GoodWe adheres to the concept of responsible supply chain management and strictly prohibits the procurement of mineral resources from conflict areas, including but not limited to key minerals such as gold, tin, tantalum, and tungsten. To ensure compliance from the source, the company requires all suppliers to provide detailed documentation proving the origin of the minerals. Through strict verification, it ensures that all procured minerals are sourced from non-conflict and low-risk areas,

effectively avoiding the risk that mineral procurement may indirectly fuel armed conflicts.

公司要求供应商以公开、规范的方式披露矿产来源信息，通过定期开展供应商审查与评估，强化对合作伙伴的全周期监管，确保其严格恪守公司的冲突矿产管理政策。

The company requires suppliers to disclose information on the origin of minerals in an open and standardized manner. By regularly conducting supplier reviews and evaluations, it strengthens the full - cycle supervision of its partners to ensure that they strictly abide by the company's conflict minerals management policy.

固德威建立了系统化的冲突矿产风险评估机制，依据经济合作与发展组织（OECD）相关指南及国际标准，对供应链中潜在的矿产来源风险进行精准识别与分级评估。针对评估中发现的高风险供应商，公司将启动专项管控程序，通过限期整改、重新核查、暂停合作等差异化措施实施闭环管理，确保所有采购矿产均符合国际法规要求与企业道德标准，持续夯实负责任的供应链根基。

GoodWe has established a systematic conflict minerals risk assessment mechanism. Based on the relevant guidelines and international standards of the Organization for Economic Co - operation and Development (OECD), it accurately identifies and conducts hierarchical assessments of potential risks associated with the origin of minerals in the supply chain. For high - risk suppliers identified during the assessment, the company will initiate a special control procedure. Through differentiated measures such as rectification within a specified time limit, re - verification, and suspension of cooperation, it implements closed - loop management to ensure that all procured minerals comply with international regulations and corporate ethical standards, continuously strengthening the foundation of a responsible supply chain.

以 2023 年为基准，到 2030 年确保 100% 供应商对 CMRT 做出响应，全面覆盖供应链各环节涉及的矿产采购相关合作伙伴。

Using 2023 as the baseline, by 2030, GoodWe aims to ensure that 100% of its suppliers respond to the Conflict Minerals Reporting Template (CMRT), comprehensively covering all partners involved in mineral procurement across all aspects of the supply chain.

## 政策更新与审查机制

### Policy Update and Review Mechanism

供应链 ESG 合规部门牵头，每年第四季度对政策执行情况进行全面评估，报管理层审议后向董事会汇报。以 3 年为一个周期，由 ESG 管理部联合法务部、采购部等部门，结合国家法规更新、国际合规要求变化、行业实践发展及公司战略调整，对政策进行全面修订与完善，修订方案需经董事会审批后生效。

Led by the Supply Chain ESG Compliance Department, a comprehensive assessment of policy implementation is conducted in the fourth quarter of each year. After being reviewed by the management, the results are reported to the board of directors. With a three - year cycle, the ESG

Management Department, in conjunction with the Legal Department, Purchasing Department and other departments, comprehensively revises and improves the policy in light of national regulatory updates, changes in international compliance requirements, industry practice development and corporate strategic adjustments. The revised plan shall come into effect after being approved by the board of directors.

出现以下情形之一时，应启动政策紧急更新程序：

The policy emergency update procedure shall be initiated when one of the following situations occurs:

- 相关国家法律法规或国际合规要求发生重大变化；
- There are significant changes in relevant national laws and regulations or international compliance requirements;
- 公司业务范围、供应链结构出现重大调整；
- There are significant adjustments to the company's business scope or supply chain structure;
- 发生重大供应链 ESG 风险事件，暴露政策漏洞；
- A major supply chain ESG risk event occurs, exposing policy loopholes;
- 董事会提出政策修订要求。
- The board of directors requests policy revision.

紧急更新流程应在相关触发事件发生后 30 个工作日内完成评估，90 个工作日内形成修订方案并报批。

The emergency update process should be evaluated within 30 working days after the occurrence of relevant triggering events, and a revised plan should be formulated and submitted for approval within 90 working days.

政策发布或更新后，ESG 管理部需在 30 个工作日内组织内部采购相关部门及核心供应商开展宣贯培训，确保相关方充分理解政策要求。培训材料及记录需归档留存。

After the policy is issued or updated, the ESG Management Department needs to organize internal procurement - related departments and core suppliers to carry out publicity and training within 30 working days to ensure that relevant parties fully understand the policy requirements. Training materials and records need to be archived and retained.

## 申诉举报机制

### Appeal and reporting mechanism

供应商对公司可持续采购审核结果、考核评级、处罚决定等存在异议的申诉；

Appeals from suppliers regarding their objections to the company's sustainable procurement audit results, assessment ratings, penalty decisions, etc.

对采购活动中违反本政策的行为举报，包括但不限于：

Report on behaviors that violate this policy in procurement activities, including but not limited to:

- 采购人员收受回扣、泄露招标信息等廉洁问题;
- Integrity issues such as procurement staff accepting kickbacks and leaking tender information;
- 供应商存在环境违规、劳工权益侵害、商业欺诈等问题未被处理;
- Issues such as environmental violations, labor rights infringements, and commercial fraud by suppliers have not been addressed;
- 政策执行过程中存在徇私舞弊、故意刁难供应商等行为。
- Acts of favoritism and deliberately making things difficult for suppliers occur during policy implementation.

公司设立多元化、保密的申诉举报渠道，相关信息在公司官网、供应商门户及办公区域显著位置公布：

The company has established diversified and confidential complaint and reporting channels, and relevant information is published on the company's official website, supplier portal, and prominent locations in the office area.

- 申诉举报专用邮箱：[GOODWE-Inform@goodwe.com](mailto:GOODWE-Inform@goodwe.com)
- Dedicated email address for complaints and reports: [GOODWE-Inform@goodwe.com](mailto:GOODWE-Inform@goodwe.com)
- 申诉举报专用电话：0512-62396791
- Dedicated phone number for complaints and reports: 0512-62396791

公司严禁对申诉举报人实施打击报复行为。对于因申诉举报而遭受不公平对待的相关方，经核实后，将依法依规予以纠正，并对相关责任人进行严肃处理。

The company strictly prohibits acts of retaliation against complainants and whistleblowers. For the relevant parties who have been unfairly treated due to their complaints or whistleblowing, after verification, the situation will be corrected in accordance with laws and regulations, and the relevant responsible persons will be seriously dealt with.

**本政策经公司批准，自 2023 年 9 月 7 日起生效。**

**This policy has been approved by the company and shall come into force as of September 7, 2023.**

黄敏

Min Huang

董事长兼总经理

Chairman of the Board of Directors and President

日期：2023 年 9 月 6 日

Date: 2023/9/6