

Grievance, Complaint, and Report Management Policy

Grievance, Complaint, and Report Management Policy

1 Purpose and Basis

ESG

ESG

To ensure the effective operation of the Company's Environmental, Social, and Governance (ESG) management system, genuinely safeguard the legitimate rights and interests of employees and stakeholders, and establish accessible, fair, and confidential grievance and reporting channels, ensuring that all concerns, complaints, or reports related to ESG topics are promptly received, objectively investigated, and effectively remediated, this Policy is hereby formulated.

2 Scope of Application

ESG

This Policy applies to any stakeholder (including but not limited to directors, senior management, all types of employees, service providers, suppliers, partners, customers, community residents, and the general public) of Shanghai Aiko Solar Co., Ltd. and its subsidiaries regarding their grievances, complaints, and reports on ESG topics.

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Subsidiaries includ but are not limited to Zhejiang Aiko Solar Technology Co., Ltd., Tianjin Aiko Solar Technology Co., Ltd., Guangdong Aiko Solar Technology Co., Ltd., Zhuhai Fushan Aiko Solar Technology Co., Ltd., Chuzhou Aiko Solar Technology Co., Ltd., Shandong Aiko Solar Technology Co., Ltd., etc., collectively referred to as "AIKO".

ESG

ESG topics include but are not limited to:

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ESG	Category	Specific Topics

Dimension		
E- E-Environment	Environment	Excessive pollutant discharge, illegal disposal of hazardous waste, workplace environmental safety deficiencies (poor ventilation, exposure to toxic and hazardous substances), energy waste, excessive water consumption inconsistent with the Company's environmental commitments, environmental data falsification or false environmental claims, etc.
S- S-Social	Labor and Human Rights	

		Any form of child labor or forced labor, withholding of identity documents, collection of deposits, restriction of personal freedom, discrimination (based on race, color, age, gender, sexual orientation, religion, disability, marital status, pregnancy, etc.), workplace harassment (including sexual harassment, bullying, intimidation, psychological oppression), retaliation, wage arrears.
	Occupational Health and Safety	Failure to provide necessary personal protective equipment
	Supply Chain	

	Responsibility	Suppliers' human rights violations, environmental violations, unclear sources of conflict minerals, or failure to conduct due diligence, etc.
G- G-Governance	Business Ethics and Information Security	Violations of business ethics (bribery, corruption, conflicts of interest, money laundering), unfair competition, infringement of trade secrets, personal information leakage or data security incidents, etc.

3 Grievance and Reporting Channels

The Company has established diversified and accessible grievance and reporting channels. Internal and external stakeholders may submit grievances, complaints, or reports through any of the following channels, either anonymously or by name:

Channel Type	Specific Channel	Matters Accepted
Email	esg@aikosolar.com	ESG Environmental, social, and general ESG topics
	audit@aikosolar.com	Anti-corruption, business ethics, conflicts of interest
	juangongguanxi@AIKOsolar.com	Labor rights, workplace relationship grievances
	Aikoprocurement@aikosolar.com	Supply chain

		responsibility matters
QR Code Complaint and Reporting Channel		All types of grievances and reports
Physical Mailbox	“ ” "Report Mailbox" at each base (canteen, workshop)	All types of grievances and reports
Corresponden ce	699 -ESG ESG Department, R&D Building, No. 699 Haopai Road, Yiwu City, Zhejiang Province, China	All types of grievances and reports
	699 - Audit Department, R&D Building, No. 699 Haopai Road, Yiwu City, Zhejiang Province, China	Anti-corruption, business ethics, conflicts of

		interest
	699 - Information Security Department, R&D Building, No. 699 Haopai Road, Yiwu City, Zhejiang Province, China	/ Information security/data breach reports
	699 - EHS Department, R&D Building, No. 699 Haopai Road, Yiwu City, Zhejiang Province, China	Environment and occupational health & safety
	699 - Procurement Department, R&D Building, No. 699 Haopai Road, Yiwu City, Zhejiang Province, China	Supply chain responsibility matters

4

Grievance, Complaint and Report Handling

Process

4.1 Receipt and Registration**ESG**

Each directly responsible department (ESG Department, Audit Department, Human Resources Department, Information Security Department, Procurement Department, EHS Department, etc.) shall designate a dedicated person responsible for the daily maintenance of grievance channels, information reception, and preliminary registration.

2

Received grievances and reports shall be registered within 2 working days, and entered into a confidential ledger.

4.2 Acceptance and Assignment

Upon receiving the grievance, complaint, or report materials provided by the reporter, the content shall be promptly studied, and the investigating department shall be confirmed. If it falls under the department's purview, a dedicated person will be assigned to follow

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up on the investigation; if it falls under another department' er

complainant with reasons provided.

4.3 Investigation and Handling

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 - b. 30
 - c.
 - d. /
 - e. ESG
- a. General matters: Investigation shall be completed within 15 working days.
- b. Complex matters: With the approval of the department head, the period may be extended to 30 working days, and the complainant shall be informed of the reason for the extension.
- c. Investigation methods: Document review, personnel interviews, on-site observation, data analysis, and when necessary, entrusting third-party professional institutions.
- d. Investigation conclusions: If the matter is substantiated, a

"Grievance/Report Handling Decision Letter" shall be issued, specifying handling measures and rectification requirements. If the matter is unsubstantiated, the basis shall be explained to the named complainant and the investigation shall be terminated. If malicious false accusation is involved, the responsibility of the relevant personnel shall be pursued based on the circumstances.

e. Complex cross-departmental matters: Led by the primary responsible department, a joint investigation team shall be established (which may invite the ESG Department, Legal Department, etc., to participate) to ensure the investigation is comprehensive and objective.

4.4 Results and Feedback

Relevant handling opinions shall be sent to the reported person for final confirmation after management approval. Subsequently, the implementation of the grievance handling results shall be continuously tracked to ensure that the rectification measures and response opinions adopted are effectively executed and that no retaliation occurs.

Internal Disciplinary Violations

Warning, demerit, demotion, termination of labor contract, etc.

Illegal Acts

Transfer to judicial authorities for handling, or seek compensation through legal procedures.

Systemic Deficiencies

Initiate process optimization, training enhancement, and internal control improvement in accordance with the "Corrective Action

duration, etc.) to the ESG Department every six months (by June 30 and December 31) .

24

ESG

Major cases (involving child labor, forced labor, major corruption, mass incidents, etc.) shall be reported to the ESG Department within 24 hours.

ESG

The ESG Department is responsible for preparing an annual statistical analysis report, serving as input for management review, evaluating the effectiveness of the mechanism, and proposing improvement recommendations.

5 Whistleblower Protection

5.1 Encouragement of Reporting

The Company encourages employees, business partners, and other relevant parties to raise questions, seek advice, or report suspected

violations of this Policy in good faith through appropriate channels.

For substantiated major reports, the Company will consider giving recognition or rewards based on the circumstances.

5.2 Confidentiality Principles

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c. “ ”

a. Information Segregation: The reporter's identity information and the content of the report shall be registered separately. The reporter's information shall be kept strictly confidential by a person authorized by the directly responsible department and stored securely. Personnel without necessity and specific authorization shall not have access.

b. Scope of Knowledge: The scope of information knowledge during the investigation process shall be strictly controlled, limited only to personnel necessary for the investigation.

c. Material Management: Reporting materials and investigation process documents shall be managed as "confidential." Electronic documents shall have access permissions set, and paper documents

shall be stored in locked filing cabinets.

5.3 Non-Retaliation Commitment

The Company strictly prohibits any organization or individual from engaging in any form of retaliation against reporters, witnesses, or personnel assisting in the investigation (including denial of benefits, performance reduction, dismissal, demotion, threats, harassment, discrimination, and threats to personal safety). The Company has zero tolerance for retaliation. Once λ

