

Responsible Minerals Sourcing Policy

United Solar Polysilicon (FZC) SPC (“USP”, “we”) manufactures high-purity polysilicon at Sohar Free Zone, Sultanate of Oman. Our only mineral-bearing input is metallurgical-grade silicon metal (MG-Si). We do not purchase or consume quartz; quartz is smelted one tier upstream by our MG-Si suppliers, which are the choke point of the silicon value chain.

Recognizing that risks of significant adverse impacts may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognizing that we have the responsibility to respect human rights and not contribute to conflict, we commit to implement the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition (the “OECD Guidance”), and to adopt, widely disseminate and incorporate in contracts and agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and suppliers’ risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

This policy applies to all of our suppliers, whatever they supply, and to each successive tier of our supply chain up to the mine of origin.

Regarding serious abuses associated with the extraction, transport or trade of minerals

1. We will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:
 - i) any forms of torture, cruel, inhuman and degrading treatment;
 - ii) any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
 - iii) the worst forms of child labour;
 - iv) other gross human rights violations and abuses such as widespread sexual violence;
 - v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Risk management of serious abuses

2. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

Regarding direct or indirect support to non-state armed groups

3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:
 - i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
 - ii) illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
 - iii) illegally tax or extort intermediaries, export companies or international traders.

Risk management of direct or indirect support to non-state armed groups

4. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

Regarding public or private security forces

5. We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.
6. We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

7. Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.
8. We will support or take steps to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.
9. We will support or take steps to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of public or private security forces on mine sites.

Risk management of public or private security forces

10. In such cases, we will implement the risk management plan and conduct an additional risk assessment within six months of its adoption to determine whether significant and measurable improvement has been achieved. Where such improvement has not been demonstrated, we will suspend or discontinue engagement with the relevant upstream supplier. Any suspension and subsequent resumption of trade will be subject to a revised risk management plan setting out the performance objectives for progressive improvement that must be met before trade resumes. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same vein.

Regarding bribery and fraudulent misrepresentation of the origin of minerals

11. We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.

Regarding money laundering

12. We will support and take steps to contribute to the effective elimination of money laundering where we identify a reasonable risk of money laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

Regarding the payment of taxes, fees and royalties due to governments

13. We will ensure that all taxes, fees and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with our position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industries Transparency Initiative (EITI).

Risk management of bribery and fraudulent misrepresentation of the origin of minerals, money laundering and payment of taxes, fees and royalties due to governments

14. In accordance with our specific position in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales.
15. We will conduct an additional risk assessment within six months of adopting the risk management plan to determine whether significant and measurable improvement has been achieved. Where such improvement has not been demonstrated, we will suspend or discontinue engagement with the relevant upstream supplier. Any suspension and subsequent resumption of trade will be subject to a revised risk management plan setting out the performance objectives for progressive improvement that must be met before trade resumes.

Application of this policy by USP

Conflict-affected and high-risk areas

16. We adopt the definition of conflict-affected and high-risk areas set out in the OECD Guidance. We treat the following as high-risk areas: the areas on the European Union indicative list maintained under Regulation (EU) 2017/821, as updated from time to time; the Democratic Republic of the Congo and its adjoining countries; and any location at which labor is supplied under a labor transfer program originating in that Region; jurisdictions subject

to comprehensive economic sanctions; areas in which mine sites, transportation routes or points where minerals are traded are controlled by non-state armed groups; and any area in respect of which a supplier declines or is unable to permit verification of origin.

17. We will not source, and we prohibit our suppliers from supplying to us, any mineral-bearing material that was extracted, smelted, processed or handled in such an area unless it has been cleared through our risk management process; that was produced, in whole or in part, using forced or compulsory labour, the worst forms of child labour, or labor supplied under a labor transfer program, at any tier of the supply chain; or that cannot be traced, on documentary evidence we are entitled to verify, to the mine of origin.

Implementation

18. We implement this policy through a due diligence management system based on the OECD Guidance's Five-Step Framework and commit to applying the due diligence recommendations appropriate to USP's position and circumstances in the silicon mineral supply chain. This includes management systems and internal controls over our supply chain; identification and assessment of supply chain risks; a risk response of continuing, suspending or terminating a relationship in accordance with the paragraphs above; independent third-party audit or assessment of due diligence practices at identified control points in our MG-Si supply chain, where appropriate and proportionate to risk; and annual public reporting on our supply chain due diligence. Our supporting procedures are maintained internally and are made available to customers and auditors on request.
19. Risk management measures, timelines and escalation actions will be determined according to the nature of the identified risk and the applicable risk response set out in this policy and the OECD Guidance.
20. Each supplier is required to comply with this policy, to accept its incorporation into its contract with us, to impose equivalent obligations on its own suppliers at each successive tier up to the mine of origin, to disclose the origin of all material supplied to us and provide the records necessary to verify it, and to permit assessment of its sites and records. Breach may result in suspension or termination of the relationship.
21. Where appropriate, USP will engage with and support suppliers in strengthening their due diligence capacity and in developing and implementing measurable improvement plans.

Reporting and grievances

22. As part of our early-warning risk-awareness system, any worker, supplier, community member or other interested party may report a concern relating to this policy, or to any conduct inconsistent with it anywhere in our supply chain, including anonymously, through the channels published on our website:

PublicGrievance@unitedsolarholding.com

+968 2115 4528

We investigate every report received, and we prohibit retaliation of any kind against any person who raises a concern in good faith or cooperates in an investigation.

Review and publication

This policy is reviewed at least annually, and upon any material change in our supply chain or in the applicable law or guidance. It is communicated to every supplier and the current version is published on our website:

www.unitedsolarholding.com/sustainable.