2025 Environmental, Social and Governance Report

Contents

About This Report

Report Overview

This report is the thirteenth environmental, social, and governance (ESG) report issued by GCL Technology Holdings Limited (abbreviated as "GCL Technology," "the Group," or "we," and formerly known as "GCL-Poly Energy Holdings Limited").

This report focuses on disclosing the management and performance of GCL Technology and its subsidiaries in environmental, social, and governance aspects. This report is an annual report covering the work from January 1,2025 to December 31,2025 (the "reporting period"). To enhance the readability of this report, some content or data may be retrospective, including information from previous or subsequent years.

Basis for Preparation

This report has been prepared in accordance with *Appendix C2 Environmental, Social and Governance Reporting Code ("ESG Reporting Code")*under the *Main Board and GEM Listing Rules* of the Stock Exchange of Hong Kong Limited (HKEX). Additionally, this report also refers to the Global Reporting Initiative (GRI) Sustainability Reporting Standards (GRI Standards), mainstream ESG index ratings such as MSCI ESG Ratings, the S&P Global Corporate Sustainability Assessment (CSA), and Morningstar's Sustainability Rating (Sustainalytics). The report adopts a systematic materiality assessment process, incorporating both internal and external evaluations. The scope of disclosure, data collection, and calculations are based on the principles of materiality, relevance, and applicability, with consideration of parameters applicable to the Group's industry and geographic locations.

Reporting Scope

The policy documents, statements, and data in this report cover the headquarters of the Group, the subsidiaries, and holding companies under actual control (unless specified), as detailed in the tables below. The historical data referenced in this report are final statistics, and financial information is presented in RMB[1].

The scope of business covered in the GCL Technology ESG Report for 2025 is described as follows:

Business Scope	Full Name	Abbreviation
GCL Technology Holdings Limited		GCL Technology, the Group, or we
GCL (Group) Holdings Co., Ltd.		GCL Group
Polysilicon Segment	Jiangsu Zhongneng Polysilicon Technology Development Co., Ltd.	Jiangsu Zhongneng
	Leshan GCL New Energy Technology Co., Ltd.	Leshan GCL
	Inner Mongolia Xinyuan Silicon Material Technology Co., Ltd.	Inner Mongolia Xinyuan
	Inner Mongolia Xinhuan Silicon Energy Technology Co., Ltd.	Inner Mongolia Xinhuan
Wafer Segment	Ningxia GCL Photovoltaic Technology Co., Ltd.	Ningxia Photovoltaic
	Jiangsu GCL Silicon Material Technology Development Co., Ltd.	Xuzhou Photovoltaic
	Suzhou GCL Photovoltaic Technology Co., Ltd.	Suzhou GCL
	Konca Solar Cell Co., Ltd.	Konca Solar
	Funing GCL Photovoltaic Technology Co., Ltd.	Funing GCL
Others	Henan GCL Photovoltaic Technology Co., Ltd.	Henan GCL
	Ningxia GCL Monocrystalline Silicon Technology Development Co., Ltd.	Ningxia GCL Monocrystalline
	Xuzhou GCL Solar Energy Material Co., Ltd.	Xuzhou Solar Energy Material
	GCL High-Tech Nano New Materials (Xuzhou) Co., Ltd.	Xuzhou High Tech

Access to the Report

You may download the simplified Chinese, traditional Chinese, and English versions of this report from the official website of GCL Technology at www.gcltech.com. In case of discrepancies among the reports of three languages, the simplified Chinese version shall prevail.

If you have any questions or suggestions regarding this report or the Group's ESG work, please feel free to contact us by phone or mail. Our contact details are as follows:

Sustainability center of GCL Technology Holdings Limited

Address: GCL Energy Center, No. 28, Xinqing Road, Suzhou Industrial Park, Jiangsu Province, China

Phone: +86 512 6853 3900

E-mail: ESG@gcl-power.com

Website: www.gcltech.com

Data Sources

The data used in this report come from relevant internal statistics of GCL Technology, public reports and media coverage, as well as publicly available data from third-party surveys or interviews, government departments, professional organizations, and other sources. The Board of GCL Technology guarantees that this report does not contain any false records, misleading statements, or material omissions.

[1] If CNY-USD conversions are involved throughout this document, the following exchange rate standards shall apply uniformly: RMB 7.0827/USD for fiscal year 2023, RMB 7.1884/USD for fiscal year 2024, and RMB 7.0288/USD for fiscal year 2025.

Chairman's Statement

"ESG is the core pillar that enables enterprises to navigate the world's complex landscape and market shifts while solidifying the foundation for long-term development. As a global leader in zero-carbon energy high-tech materials, GCL Technology embeds ESG into its development DNA and throughout its strategic planning and innovative practices, using it as the fundamental guideline for advancing industry value, fostering new quality productive forces, and fulfilling social responsibility, thereby demonstrating its robust capabilities and commitment to responsibility amid the energy transition and industrial restructuring worldwide."

Standing at the historic intersection of the conclusion of the 14th Five-Year Plan and the opening of the 15th Five-Year Plan, the global energy system is undergoing profound restructuring, while frontier technologies such as quantum computing and AI continue to emerge, driving the intertwined evolution of technological revolution and industrial transformation. GCL Technology remains anchored in its strategic positioning as a "global leader in zero-carbon energy high-tech materials R&D and intelligent manufacturing" , breaking path dependence through hardcore innovation and a long-term development vision, building resilience amid change, and seizing development opportunities ahead of the curve in the global green transition.

GCL Technology deeply integrates ESG into its corporate development strategy and embeds it throughout strategic planning, technological innovation, and operational management, with the four pillars of "Infinity" serving as the core lever to systematically build a sustainable development system. In terms of our development path, we uphold a green orientation of "material carbon reduction, technology carbon management, and full-chain decarbonization", and drive the low-carbon upgrading of the entire industrial chain through sustained hardcore innovation. In terms of capacity building, we remain committed to building the enterprise on a digital foundation, empowering green development through digital transformation and reshaping new quality competitive advantages. In terms of ecological value, we proactively broaden our vision and elevate our standing, earnestly fulfill our responsibilities as a chain leader, empower the co-construction of the industrial ecosystem with the ESG philosophy, rally synergized forces from upstream and downstream partners, and work together to build an industrial community with a shared future featuring risk sharing, benefit sharing, and sustainable development.

GCL Technology Holdings Limited
Chairman of the Board and
Joint Chief Executive Officer
Zhu Gongshan

Tech Infinity: Illuminating an Infinite Ecosystem From Core Businesses and Ushering in a New Era of Industrial Transformation

Grounded in technology and deeply committed to green development, GCL Technology regards this as the foundation of its business and a steadfast commitment to supporting the world's energy transition. In 2025, the Group continued to increase its R&D investment in green and low-carbon technologies, **with annual R&D investment reaching approximately RMB 850 million (USD 121 million), accounting for about 5.89% of total revenue**. Against the backdrop of advancing "dual-carbon" goals worldwide and the continuous improvement of green trade systems, the core challenge facing China's new energy industry in going global has shifted to stringent requirements for carbon management across the full lifecycle. In international markets, particularly in the European Union and other regions, policies are increasingly linking carbon footprint accounting with market access. Against this backdrop, GCL Technology has focused on key industry bottlenecks, driving green upgrades across the entire chain and continuously expanding the boundaries of industry growth. GCL Technology's low-carbon FBR granular silicon has provided key support for the industry in overcoming "green" trade barriers in international markets, and has obtained carbon footprint certification in China, France, Germany, and the United Kingdom, setting a **new record carbon footprint of 14.2756kgCO_2e/kg**. In terms of technology and quality, FBR granular silicon continued to improve its performance, with products whose total elemental metallic impurities of 5 elements are ⩽0.5 ppbw accounting for 98%, making them ideally suited to the production requirements of N-type high-efficiency photovoltaic cells. By virtue of its low-carbon attributes, **this technology can reduce carbon emissions across the full lifecycle of PV modules at the source, empower downstream clients to reduce Scope 3 emissions**, support the industry chain in achieving carbon neutrality goals, and accelerate progress toward a zero-carbon world.

Green Infinity: Safeguarding the Green Foundation of the Ecosystem and Opening Up Infinite Vitality for the Future

GCL Technology actively addresses the global challenge of climate change by establishing comprehensive greenhouse gas emission targets covering the short, medium, and long term. The Group has clearly set its ambition to achieve carbon neutrality in its own operations no later than 2040, and carbon neutrality across the entire value chain no later than 2050. At the same time, the Group systematically conducts climate risk identification and assessment across the full value chain, developing targeted measures based on industry characteristics to continuously enhance climate resilience and sustainable development capabilities. To further improve environmental performance, the Group has continuously strengthened its environmental management systems and advanced energy-saving technological upgrades and process optimization. In the reporting year, total electricity savings reached **71,317 MWh**. In water resource management, through systematic water-saving retrofits and recycling initiatives, it saved **3,753,700 tonnes** of water during the year. It also achieved full coverage of water risk assessments across all operational sites, increased the proportion of alternative water sources to over **76%**, and enabled "zero discharge" of production wastewater at multiple bases. In terms of waste and emissions management, end-to-end pollution control has delivered strong results. The compliance rate for pollutant discharge and the synchronous operation rate of environmental protection facilities both reached **100%**, fully achieving phased targets for emission intensity reduction.

In 2025, GCL Technology generated **RMB 13.058 billion** in green and clean revenue, accounting for approximately **90.55%** of total revenue. GCL Technology conducts regular environmental audits across all operational sites and core business activities, implementing a comprehensive internal and external audit mechanism for its environmental management system, thereby strengthening the institutional foundation for green development. Twelve stable operating production bases with certification qualifications have obtained ISO 14001 Environmental Management System certification, achieving **100%** coverage. The Group has also completed organizational carbon accounting covering its core business at **100%**, and achieved **100%** implementation of the ISO 50001 Energy Management System across its main operations. **In 2025, Leshan GCL was successfully recognized as a National Green Factory, while Jiangsu Zhongneng, Xuzhou Photovoltaic, and Funing GCL continued to maintain their status as National Green Factories**.

Talent Infinity: Cultivating Fertile Ground to Create Value and Share Growth with Employees

GCL Technology uses "One GCL" as a bond to foster an organizational culture rooted in diversity and inclusion, health and safety, and continuous learning, while systematically building a comprehensive **employee development mechanism** to advance individual potential and organizational innovation in a synergistic manner. We have established and continue to refine a formal talent pipeline development strategy to support medium- to long-term business development and key capability building. Through talent recruitment and development programs for highly educated talent, such as the **"Global Graduate Traineeship Program and the R&D PhD Hiring Program"**, we pursue targeted recruitment and systematic development for critical positions, forming a sustainable talent supply and succession system. In terms of incentive mechanisms, GCL Technology is committed to building a scientific compensation framework, fair performance evaluations, and diversified incentive measures, while continuously optimizing the work environment and management system to enhance employee belonging and attract and retain outstanding talent. To systematically empower talent and support the organization's long-term development, the Group has established the **Skills and Knowledge Development Training System**, centered on sharing our strategies, culture, knowledge, and skills, to provide all employees with systematic, tiered, and traceable development training sessions and encourage employees to leverage their strengths and expand their career pathways. In recognition of its outstanding performance, in 2025, GCL Technology was recognized with multiple honors in recruitment and employment practices, including "2025 Jiangsu Extraordinary Employer of the Year," "2025 Best Employer in the City," and "Outstanding Employer."

Value Infinity, Building a Shared Ecosystem From Internal Growth to External Extension

GCL Technology adheres to governance principles, fulfills its compliance commitments, and enables the joint creation and sharing of economic and social value. In terms of corporate governance, we fully integrate **the ESG philosophy into the core of our operations** and, by strengthening the functions of the ESG Committee, have systematically established a management system covering metrics and targets to empower the new quality productive forces through excellent governance. In terms of value chain management, GCL Technology has established a full life-cycle sustainable supply chain management system and **successfully passed the supervisory assessment for the ISO 20400 sustainable procurement conformity certification,** steadily promoting shared responsibility and collaborative progress across all value chain participants. During the year, we issued the ***Initiative on Water Conservation, Energy Saving and Waste Reduction in the Supply Chain*** and proactively worked with suppliers to jointly set quantifiable environmental targets, extending green procurement practices throughout the value chain and continuously expanding the boundaries of sustainable supply chain management. In community development, GCL Technology actively fulfills its social responsibility and shares development outcomes with society. We have established an **employee volunteer platform** to encourage employee participation in a broad range of initiatives, from philanthropic programs to ecological protection, bringing the sustainable development philosophy from concept into practice and continuing to contribute to harmonious coexistence between communities and the environment while creating economic value.

Looking to the future, the new energy industry is undergoing a sweeping structural transformation. GCL Technology will remain committed to its role as a guardian of the ecosystem, strengthening its foundation through technological innovation and pooling strength through open collaboration. We are committed to deepening cooperation with partners across all sectors, not pursuing short-term gains, and instead focusing on building an industrial ecosystem for sustainable development. The road ahead is bright, and glory is shared. GCL Technology sincerely invites all stakeholders to move forward hand in hand and embark together on this expedition that resonates with the times!

About GCL Technology

Company Profile

GCL Technology Holdings Limited was founded in 2006 and listed on the Hong Kong Stock Exchange in 2007 (stock code: 03800.HK). In 2023, the Group was included in the Fortune China 500 list. Headquartered in Hong Kong, China, GCL Technology has established subsidiaries as well as R&D and intelligent manufacturing centers in the United States and across major cities in China, including Suzhou, Xuzhou, Leshan, Baotou, Hohhot, and Zhongwei.

Vision

A global leader in zero-carbon energy high-tech materials R&D and intelligent manufacturing

Mission

Dedicated to green growth to keep improving the human living environment

Dream

Powerful GCL, Employee Wealth, Social Praise

Core Values

Value-led, Innovation-Driven, Effort-Founded, Unity-Focused

Business Operations

As a global leader in zero-carbon energy high-tech materials R&D and intelligent manufacturing, GCL Technology has long been committed to innovation in energy materials, the Group continues to advance the coordinated development of a diversified materials portfolio, building a forward-looking zero-carbon high-tech materials system and striving to become a technology leader driving the global energy transition.

In the field of silicon materials, GCL Technology has independently developed its proprietary core technology—the Fluidized Bed Reactor (FBR) granular silicon process—through years of dedicated R&D. With advantages including lower cost, higher efficiency, and an ultra-low carbon footprint, this technology has continuously set new global benchmarks for silicon carbon intensity, becoming a key enabler for carbon reduction and green transformation across the photovoltaic industry.

Looking toward next-generation photovoltaic technologies, GCL Technology is actively advancing the R&D and industrialization of perovskite solar modules. Its subsidiary, GCL Optoelectronics[2], maintains a global leading position across key performance metrics such as high efficiency, large-area scalability, lower carbon footprint, and enhanced stability. The Group is also exploring the potential of perovskite technologies in future energy applications such as space-based energy, opening up new pathways for next-generation high-efficiency energy utilization.

Driven by technology and rooted in materials, GCL Technology will continue to deepen innovation in energy materials, advance low-carbon technological breakthroughs, and promote industrial upgrading. Amid the profound global energy transition, the Group is accelerating its journey toward becoming a world-leading new materials technology enterprise.

FBR Granular Silicon

Quality

Basically fully achieved

Total metal impurity content of 5 elements

$\leqslant 0.5$ppbw

Total metal impurity content of 18 elements

$\leqslant 1$ppbw

Carbon footprint

Reduced to

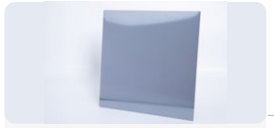
$14.2756\ kgCO_2e/kg$[3]

setting a new global record

The full production capacity of granular silicon can reduce approximately

9.22 million tonnes of CO_2 emissions annually[4]

compared to Siemens-method rod silicon



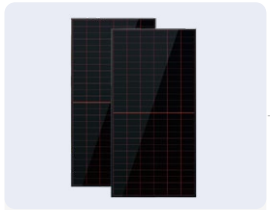
Wafer

Carbon footprint

Wafer products using granular silicon as raw material have a **carbon footprint far below the industry average**

Performance

The products deliver excellent appearance and electrical performance and are suitable for various battery technology such as **TOPCon, HJT, and XBC**.



Perovskite Modules

Milestone in scale

In June 2025, the world's first GW-scale tandem module production base **commenced production** in Kunshan

In October 2025, the first 2400mmX1150mm full-size perovskite module officially rolled off the GW-scale **perovskite production line**

Efficiency leadership

The full-size module covers an area of 2.76 m^2, with mass production efficiency steadily exceeding

27%

establishing its leading position as the world's largest mass-produced commercial product

[2] GCL Optoelectronics, formally known as Kunshan GCL Optoelectronic Material Co., Ltd., is a high-tech enterprise within the GCL Group dedicated to the research and manufacturing of perovskite photovoltaic modules.

[3] In December 2025, Inner Mongolia Xinyuan Silicon Materials Technology Co., Ltd. obtained the Life Cycle Assessment (LCA) Verification Statement issued by the British Standards Institution (BSI), an internationally authoritative certification body. The "cradle-to-gate" carbon footprint of the company's granular silicon product is 14.2756 $kgCO_2e/kg$.

[4] The calculation method of carbon dioxide emission reduction is: (Average power consumption per kilogram of rod silicon production - Power consumption per kilogram of granular silicon production) * National average power grid emission factor * Unit conversion coefficient. Among them, the average power consumption of rod silicon is 50.0 kWh/kg-Si from the China Photovoltaic Industry Association's "2025-2026 China Photovoltaic Industry Development Roadmap"; the power consumption of granular silicon production is 13.8 kWh/kg-Si; the national average power grid emission factor adopts the 2023 national average carbon dioxide emission factor for electricity of 0.5306 $kgCO_2/kWh$ as specified in the *Announcement on the Release of 2023 Electricity Carbon Dioxide Emission Factors*.

Annual Awards and Recognition

Outstanding Environmental Performance Award - Commendation
Hong Kong ESG Reporting Awards (HERA)

Global Top 100 New Energy Enterprises in ESG Ranking
Asia Photovoltaic Industry Association (APVIA)

APVIA Talent Cultivation Award
Asia Photovoltaic Industry Association (APVIA)

2025 CITI Top 10, 2025 CATI Top 10
Institute of Public and Environmental Affairs (IPE), Green Jiangnan (PECC)

21st Century Vitality ESG Environment-Friendly Case
21st Century Business Herald

Zero-Carbon Earth · Singularity Award
Yangtze River Delta International Green Development Alliance

Yangtze River Delta Enterprise Green and Low-Carbon Innovation Case
Yangtze River Delta International Green Development Alliance

Second Prize in the Technical Achievement Category of the Electric Power Innovation Award
China Electricity Council

2026 Outstanding Employer
51job

United Nations Global Compact

GCL Technology has joined the United Nations Global Compact (UNGC)

Forbes China Industry-Finance Integration Leading Enterprise
Forbes China

Hurun China 500
Hurun China

Outstanding ESG Sustainable Enterprise (listed Company)
Hong Kong Economic Journal

ESG China 2026 Most Noteworthy List - ESG Leading Enterprise
Bloomberg Green Gold

Forbes China ESG Benchmark for Industry Development
Forbes China

Outstanding Sustainability Practice Case for Listed Companies
China Association for Public Companies

ESG Ratings

SUSTAINALYTICS
a Morningstar company

A Morningstar Company that provides high-quality ESG research, ratings, and data to institutional investors and companies, assessing the level of ESG risk faced by companies. The lower the score, the better the performance.

20.38
73/357 (Semiconductor Equipment Industry)

Sustainable Fitch
a FitchSolutions Company

Sustainable Fitch is an independent organization under Fitch Ratings that focuses on providing ESG ratings, research, and data service.

2
ESG Entity Rating, Overall Score of
70

Win.d

Wind ESG rating integrates international ESG standards, investment practices in China's capital markets, and the intrinsic characteristics of Chinese listed companies to form a data-driven evaluation framework.

A
84 / 408 (Electrical Equipment III)

S&P Global

The S&P Global Corporate Sustainability Assessment (CSA) evaluates companies across multiple dimensions, including corporate governance, environmental protection, and social responsibility, and provides a comprehensive view of their ESG management and information disclosure.

52
The Group Outperformed the Semiconductor Manufacturing Industry Average across all ESG Dimensions

CDP
DISCLOSURE INSIGHT ACTION

CDP is a not-for-profit organization that created a global disclosure system, enabling investors and companies to measure and manage their environmental impacts.

B
Climate Change/ Water Security

恒生可持续发展企业指数系列

The Hang Seng Sustainability rating system, launched by Hang Seng Indexes Company Limited, aims to assess corporate ESG performance across multiple industries and is an influential sustainable development evaluation framework in Hong Kong's capital market.

A
For Three Consecutive Years Top 30% among Peers

LSEG DATA & ANALYTICS

The Refinitiv ESG Rating, under the London Stock Exchange Group, measures companies' relative ESG performance across 10 thematic categories based on publicly available data.

63.2
/100（B）
Above Industry Average

商道融绿
SynTao Green Finance

SynTao Green Finance is a leading ESG rating agency in China, committed to providing professional ESG data, ratings, and research service to help investors identify and manage ESG risks.

A
10/776 Manufacture of Computers, Communication and Other Electronic Equipment

(Last updated: February 2026)

Key Performance

Economic

Revenue
RMB 14.42 billion

Polysilicon
Market share exceeded
22.9%

Revenue from green and clean opportunities
Amounted to
RMB 13.058 billion

Accounting for approximately
90.55%
of total revenue

Environmental

Renewable energy electricity consumption accounted for
56%
of total electricity consumption

up
62.98%
YoY

Comprehensive energy consumption intensity was
78.70 MWh/MW of wafers

down
3.62%
YoY

GHG emission intensity was
35.08 tCO_2e/MW of wafers

down
3.43%
YoY

The proportion of total alternative water sources used reached
76.48%

Water consumption intensity was
103.35 tonne/MW of wafers

down
8.14%
YoY

Environmental protection training exceeded
46.7 thousand participants

with a total duration of over
41.8 thousand hours

Social

Total R&D investment amounted to
RMB 850 million
(USD 121 million)

Accounting for
5.89%
of revenue

The R&D team has reached
2,161 employees

12
R&D projects were carried out

Total patent applications reached
1,910

Total patents granted reached
1,398

Quality-themed training sessions reached
3,169

Totaling
22,886
participants

12 bases
with stable operations and certification qualifications obtained ISO 14001, ISO 45001 and ISO 9001 system certifications

5 companies
obtained SA8000 social accountability system management certification

Governance

Shareholders' meeting
1

Board meetings
37

Board committee meetings
19

ESG committee meeting
4

The number of non-compliance incidents involving lobbying or political financing activities, corruption and bribery, unfair competition, and similar violations remained
0

Business ethics training coverage remained at
100%
for five consecutive years

Inner Mongolia Xinyuan and Jiangsu Zhongneng have obtained ISO 37001 Anti-Bribery Management System certification

Feature

Decoding Low-Carbon:

GCL Technology's Green DNA Empowering Global Energy Transition

Green and Low-Carbon Edge Empowering Global Expansion

2025 marks a key watershed year as the world's new energy industry moves toward profound restructuring, and an important juncture at which the industry's development logic is being comprehensively reshaped and green value orientation continues to become more prominent. At present, the focus of industry development has shifted toward deeper value competition centered on technological innovation, low-carbon efficiency, and sustainable development. GCL Technology has deeply integrated carbon management concepts throughout the entire process of its operations and development. Leveraging its long-term accumulated R&D strengths in the field of new energy materials, and supported by a low-carbon technology pathway and a green manufacturing system, the Group has built differentiated competitive advantages in product carbon footprint, energy consumption, and overall cost. By continuously deepening the deployment of low-carbon products and strengthening the construction of ESG management system, the Group is steadily enhancing its core competitiveness in overseas markets and achieving sustainable high-quality development and value reshaping amid the industry's structural adjustment.

Global Energy Transition and Green Trade Trends

Against the backdrop of frequent geopolitical conflicts, rising demands for global energy security and autonomous supply, and the deepening advancement of carbon neutrality goals, demand in the new energy market continues to grow. However, the challenges facing China's new energy industry in expanding overseas have shifted from pure cost and scale competition to stringent requirements for carbon management across the full product lifecycle. International markets, especially regions represented by the EU, are accelerating the establishment of a green trade access system centered on carbon management, closely linking carbon footprint with product classification, market access, and even tax policies. Through the dual constraints of policy regulation and market mechanisms, this is reshaping the global industrial landscape and making low-carbon compliance capability an indispensable hard threshold for companies going global.

As an important bellwether for the world's green trade rules, the EU is building hard barriers through multiple policies: CBAM has entered the compliance implementation stage, compelling the industry chain to make early arrangements for full-lifecycle low-carbon compliance; *the Net-Zero Industry Act* incorporates low-carbon production and carbon footprint into the core dimensions of market access, forming a dual constraint of "carbon tariffs + industry regulation." Other countries and regions are also following suit, directly linking low-carbon performance to market access and subsidies while continuously tightening the thresholds for green trade.

In addition, the increasingly stringent ESG audit requirements of downstream and overseas customers—from carbon footprint accounting across the full product lifecycle, the development of sustainable supply chain systems, and the establishment of corporate social responsibility systems to the building of corporate ESG systems and disclosures—have all become key evaluation metrics for supplier onboarding, thereby forcing the new energy industry chain to accelerate its transformation toward low-carbon and high-quality development. Technology pathways featuring lower energy use, fewer emissions, and higher carbon efficiency are becoming the core advantage for overcoming trade barriers and winning customer recognition, while also opening up broad global market opportunities for innovative products with inherent low-carbon strengths.

Low-Carbon Products Build Differentiated Competitiveness

GCL Technology's low-carbon product, FBR granular silicon, leverages the advantages of low-power-consumption, low-emission green lean production processes to significantly reduce the carbon footprint of the polysilicon link from the source of the industry chain, serving as a core enabler of synergistic carbon reduction across the upstream and downstream of the entire industrial chain, effectively lowering total carbon emissions over the full-lifecycle of PV modules and helping the industry break through international green trade barriers, thereby reinforcing a solid low-carbon competitive foundation for global market expansion.

In terms of technology, FBR granular silicon has achieved further all-round breakthroughs:

Product Quality Continued to Improve

The proportion of products with metallic impurity content of 5 elements ⩽ 0.5 ppbw reached **98%**

making them perfectly suited to the needs of N-type high-efficiency photovoltaic cells.

Granular silicon has achieved a product ratio of **91%**

with turbidity ⩽ 70 NTU.

In terms of its low-carbon attributes, FBR granular silicon has obtained carbon footprint certifications in China, France, Germany, and the United Kingdom, breaking the carbon footprint record of rod silicon produced through the traditional Siemens process and becoming a new carbon footprint benchmark for international pan-semiconductor materials.

Continuous Breakthroughs in the Carbon Footprint of FBR Granular Silicon:

"Gate-to-Gate" Product Carbon Footprint Certification

The Inner Mongolia Xinyuan base obtained authoritative certification from ADEME

with its gate-to-gate carbon footprint reduced to **14.441** $kgCO_2e/kg$

representing a breakthrough improvement of **42%**

compared with the certified value of 24.913kg CO_2e/kg at the Leshan base in August 2024

"Cradle-to-Gate" Product Carbon Footprint Certification

FBR granular silicon officially obtained a product carbon footprint report issued by the China Electronics Standardization Institute

with a cradle-to-gate carbon footprint of **28.16** $kgCO_2e/kg$

and was successfully included in the localized carbon footprint database for the PV industry

FBR granular silicon obtained a life cycle assessment verification statement issued by the British Standards Institution (BSI)

with a cradle-to-gate carbon footprint of **14.2756** $kgCO_2e/kg$

significantly below the industry average and setting a new record for low-carbon production of silicon-based materials

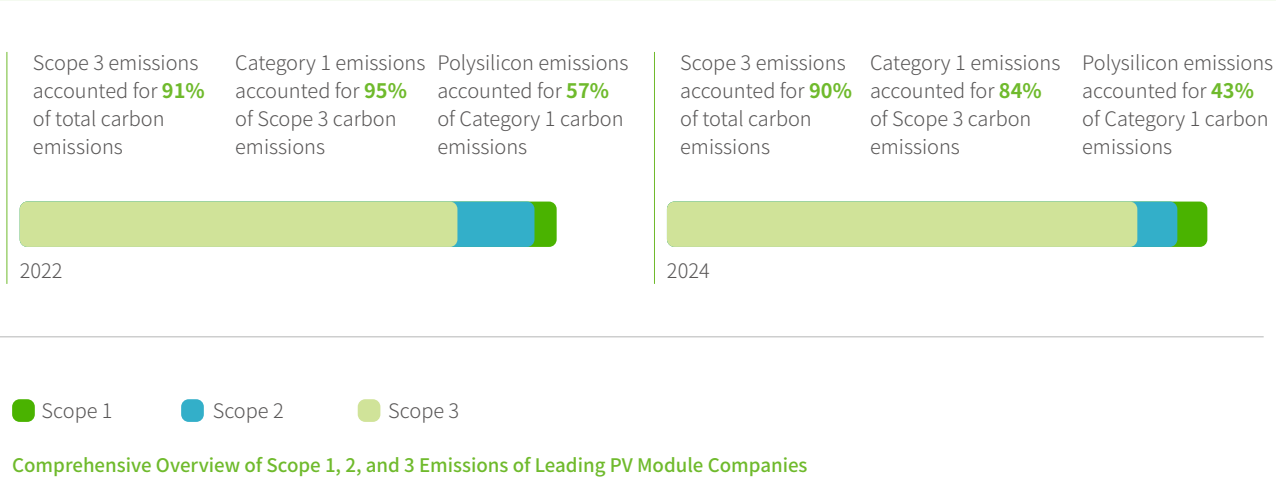
As of the end of 2025

Granular silicon had an effective capacity of **480,000** tonnes

Compared with rod silicon, the annual output of FBR granular silicon corresponded to electricity savings of approximately **17.4** billion kWh

Equivalent to reducing carbon dioxide emissions by approximately **9.22** million tonnes

In addition, with its ultra-low-carbon value, granular silicon continues to empower downstream clients' carbon neutrality strategy and long-term emissions reduction pathways. Leveraging the low-carbon technological advantages of granular silicon, the Group has built the industry's first full-lifecycle carbon footprint tracing and management platform for photovoltaic applications, providing systematic support for downstream clients in achieving source-based carbon reduction in Scope 3 emissions. As the market share of granular silicon continues to rise, the large-scale emissions reduction effect is being accelerated, driving the transformation of the PV industry chain toward a green supply chain and injecting strong momentum into the world's energy sector in fulfilling its carbon neutrality commitments.



Comprehensive Overview of Scope 1, 2, and 3 Emissions of Leading PV Module Companies

ESG Management System Supports Expansion Into International Markets

To proactively align with compliance trends in international markets and enhance operational transparency, GCL Technology has actively advanced the assessment of ISO 20400 Sustainable Procurement Guidelines and SA8000 Social Accountability Management System certifications, and was recognized with national honors such as National Green Factories and National High-Tech Enterprises, significantly enhancing trust and brand influence in international markets. The Group has extended its green management philosophy to every link of the supply chain, established and improved a sustainable development system covering the full-lifecycle of the supply chain, continuously expanded the boundaries of sustainable supply chain management, and worked with partners across the value chain to jointly foster a new green development landscape featuring shared responsibility and mutually beneficial collaboration.

At the same time, the Group has closely aligned with ESG compliance requirements and mainstream rating standards in China and overseas, systematically established and continuously optimized its internal ESG indicator system, and comprehensively advanced a full-chain management framework spanning procedure improvement, indicator control, auditing oversight, and closed-loop improvement, thereby deeply embedding environmental, social and governance principles into every link of production and operations. Throughout industry cycles, the Group has continuously strengthened the foundations of its operations, with the competitiveness of its green and low-carbon products and the compliance capabilities of its ESG management serving as important support for maintaining business resilience and achieving value growth amid cyclical industry fluctuations.

Driving Low-Carbon Transformation Through Enhanced Capabilities

Aligned with the trend of the global green transition, GCL Technology has consistently used reductions in product and operational carbon intensity as its core lever, comprehensively advancing emissions reduction across the entire value chain and the transition toward low-carbon operations, while continuously strengthening the carbon reduction advantages driven by capability enhancement.

Climate Net-Zero Vision and Targets

Guided by the trend of the global green transition, GCL Technology systematically advances emissions reduction across the entire value chain and low-carbon operations around the two dimensions of product and operational carbon intensity, continuously strengthening its carbon reduction capabilities through internal advancement. With **"low-carbon technology innovation, industrial ecosystem integration, digital intelligence empowerment, and global climate impact"** as its climate strategy, we have established a multidimensional action framework covering operations, the value chain, the full product lifecycle, and carbon removal. In terms of target setting, we have formed a climate action system that connects the short, medium, and long term, advancing carbon intensity reduction and carbon neutrality targets in phases and laying out a clear pathway for achieving the long-term green transition. Further disclosures on the Group's climate action targets and action pathways are available in the climate change strategy section of this report.

GCL Technology Climate Strategy

Climate Vision

Against the backdrop of the global green transition, GCL Technology takes reducing the carbon intensity of its products and operations as its core focus, comprehensively advancing emission reduction across the entire value chain and low-carbon operations, and continuously strengthening its carbon reduction advantages driven by capability enhancement.

Climate Strategy

Innovation
Low-Carbon Technology Innovation

Integration
Industrial Ecosystem Integration

Intelligence
Digital and Intelligent Empowerment

Impact
Global Climate Impact

Climate Action Targets

Short-Term (2023-2026)

By 2026, GCL Technology's Scope 1+2 greenhouse gas emission intensity per unit of product will decrease by 12% compared with 2023 (the base year), covering all operational activities.

Medium-Term (2026-2030)

By 2030, GCL Technology's Scope 1+2 greenhouse gas emission intensity per unit of product will decrease by 18% compared with 2023 (the base year), covering all operational activities.

Compared to the base year of 2023, the power consumption per unit of silicon-based new material products will decrease by 12% by 2030.

Long-Term (2030-2050)

Achieve carbon neutrality at the operational level no later than 2040, and achieve carbon neutrality across the entire value chain no later than 2050.

Climate Action Pathways

1. Operational Level

- Energy efficiency improvement
- Renewable electricity use
- Zero-carbon heat supply
- Reducing energy consumption through intelligent manufacturing

2. Value Chain

- Low-carbon procurement
- Logistics decarbonization
- Green supply chain management
- Collaborative emission reduction in the photovoltaic industry chain
- Resource recycling and waste management

3. Offsetting and Removal

- Offsetting emissions using removal-based carbon credits
- Exploring removal technologies such as CCUS and biochar

4. Product Carbon Footprint Reduction Pathways

- Silicon powder: Improve energy efficiency and heat exchange efficiency
- Polysilicon: Equipment interconnection and pipeline integration, process optimization
- Silicon wafers: Lean management

5. System Support

- Energy Management System
- Sustainable Supply Chain Management System
- Digital Management System
- Technology and R&D System
- Carbon Management System
- Talent Management System

Climate Strategy

Innovation - Low-Carbon Technology Innovation

Leveraging deep expertise in material R&D, GCL Technology has redefined the carbon attributes of energy materials at the source and quantified emissions reduction achievements.

Intelligence - Digital and Intelligence Empowerment

GCL Technology is building an AI-driven digital carbon management platform covering the full lifecycle, integrating industrial big data analysis and automated robotic operations to accurately gain insights into and predict energy use through AI algorithms, thereby achieving refined reductions in energy use and carbon emissions.

Integration - Industrial Ecosystem Integration

Based on the most advanced products and technologies, GCL Technology builds a low-carbon industrial ecosystem through synergistic collaboration across the entire value chain, empowering industrial transformation and upgrading.

Impact - Global Climate Impact

GCL Technology transforms its technological advantages into global climate contributions, making low-carbon products not only a source of commercial competitiveness, but also a substantive contribution to the world's carbon neutrality goals.

GCL Technology has established a dual-track carbon neutrality target system, clarifying the pathways and timelines for achieving operational carbon neutrality and full value chain carbon neutrality.

Operational Carbon Neutrality: Focusing on Internal Operations to Create a Green Benchmark

At the operational level, GCL Technology has set more ambitious emissions reduction targets, striving to achieve operational carbon neutrality by 2040.

Phased Progress in Emissions Reduction Results for Operational Carbon Neutrality

Operational Emissions Reduction Ratio

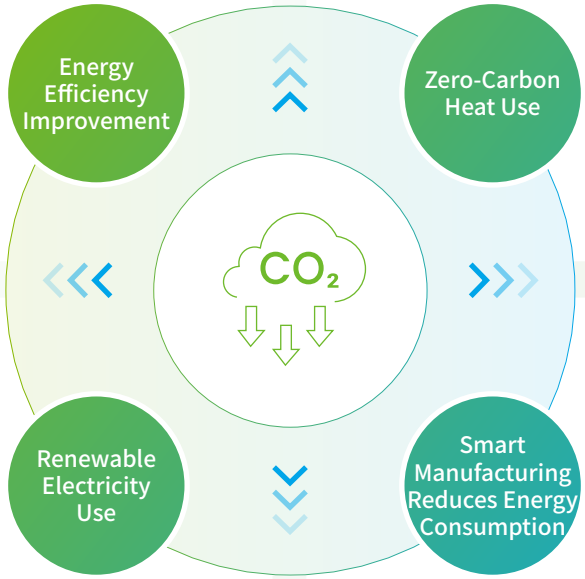
- **2030**
  Reduce by
  15%-20%
- **2040**
  Reduce by
  75%-85%
- **2050**
  Reduce by
  90%-95%

Neutralization of Remaining GHG Emissions

From 2041 onward, priority will be given to using removal-based carbon credits to offset residual emissions and maintain operational carbon neutrality.

GCL Technology has integrated energy efficiency systems across the full lifecycle of production, continuously advancing energy-saving upgrades and retrofits for high-energy-use equipment, comprehensively promoting waste heat recovery and cascade utilization technologies, and effectively reducing the intensity of comprehensive energy use in production links through a combination of process optimization and system-wide energy conservation, while continuously improving energy efficiency and the level of green production.

GCL Technology has established a long-term plan for a zero-carbon heat supply system. In the future, it will gradually adopt clean low-carbon technologies such as biomass heating, heat supply supported by energy storage, and green hydrogen, ammonia, and methanol heating, to advance the full decarbonization of heat used in production. It will strive to create 100% zero-carbon heat use, providing solid support for achieving the operational GHG emission reduction targets.



GCL Technology plans to continuously increase the share of renewable electricity through pathways such as self-built rooftop photovoltaic systems and market-based green electricity procurement, with a plan to achieve 100% renewable electricity coverage by 2040. At present, Leshan GCL has already achieved 100% clean electricity use, and the proportion of green electricity at the Inner Mongolia bases is steadily increasing.

GCL Technology uses digitalization and smart manufacturing as key levers to build a precise management system for energy, reducing energy use during non-production periods and inefficient energy consumption through "energy supply on demand" and "behavior-based energy conservation." Through measures such as equipment interconnection, pipeline integration, intermittent operation of utilities systems, and optimization of start-up and shutdown procedures, and through the dynamic regulation of parameters such as steam and compressed air via a digital energy management system, the Group achieves system-level energy efficiency optimization across process segments.

Full Value Chain Carbon Neutrality: Realizing Deep Decarbonization with Supply Chain Collaboration at the Core

GCL Technology regards full value chain carbon neutrality as a long-term strategy target and expects to achieve net-zero emissions across the entire value chain by 2050.

Phased Progress in the Carbon Reduction Effects of Full Value Chain Carbon Neutrality

Carbon Reduction Effects of Full Value Chain Carbon Neutrality

2030
Absolute value will decrease by approximately
10%-15%

2040
Absolute value will decrease by approximately
60%-65%

2050
Absolute value will decrease by approximately
90%-95%

Neutralization of Remaining GHG Emissions

Priority will be given to using removal-based carbon credits to offset emissions, while exploring carbon removal technologies such as CCUS and biochar, with full value chain carbon neutrality to be achieved starting from 2051.

Low-Carbon Procurement

GCL Technology regards low-carbon procurement as an important lever for Scope 3 emissions reduction. By establishing a green and low-carbon supplier evaluation mechanism, it incorporates carbon emissions intensity into supplier onboarding and supplier evaluation links. Using bulk raw materials such as silicon powder as a breakthrough point, the Group will reduce unit carbon footprint in phases, with medium-term plans to lower the carbon emissions intensity of silicon powder by approximately 50% from the baseline and, over the longer term, to drive an 80%–90% reduction in the carbon intensity of major suppliers, guiding upstream supply toward a low-carbon transition and controlling high-carbon materials inputs at the source.

Logistics Decarbonization

GCL Technology actively advances green logistics development by requiring logistics suppliers to disclose carbon emissions intensity per unit of turnover and the proportion of new energy vehicles, and by incorporating new energy vehicle adoption and emissions reduction targets into contracts. Through ongoing optimization of the transportation mix and vehicle mix, it strives in phases to reduce carbon emissions intensity per unit of turnover by 50%–80%, creating an integrated green supply chain emissions-reduction pathway combining "procurement + logistics."

Green Supply Chain Management

GCL Technology incorporates environmental performance, occupational health and safety, carbon emissions intensity, and other factors into supplier lifecycle management by establishing a green and low-carbon evaluation system. In the medium and long-term, the group uses supplier carbon intensity as a key procurement decision-making metric and, leveraging the digitalization-enabled Supply Chain Management platform and Carbon Management platform, establishes unified traceability and carbon footprint management processes for key materials such as silicon powder, auxiliary materials, and packaging materials.

Emissions-Reduction Coordination Across the Photovoltaic Industry Chain

GCL Technology extends the advantages of granular silicon, the world's lowest-carbon silicon-based material, through links including cells and modules, creating a transparent low-carbon value chain "from materials to power plants." It not only provides downstream module manufacturers and power plant investors with real-time product carbon footprint information, but also offers a basis for their Scope 3 emissions management and green trade compliance, supporting a systematic pathway toward achieving full value chain carbon neutrality by 2050.

Circular Resource Utilization and Waste Management

GCL Technology includes water resource management, energy management, and waste management among environmental material topics of high materiality, and has established corresponding binding targets. Through measures such as process optimization, the reuse of reclaimed water and recycled water, and cooling system upgrades, it increases the proportion of alternative water sources used; it also promotes internal and external resource recovery from waste and ensures 100% compliant disposal of hazardous waste. By optimizing packaging solutions, increasing loading capacity per box, and recycling packaging materials, the Group reduces packaging material consumption per unit of product and the intensity of solid waste generation, thereby reinforcing its emissions reduction pathway.

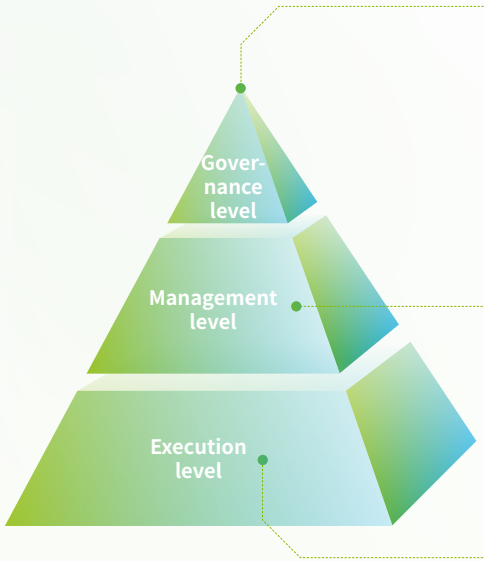
Offsets and Removals

GCL Technology gives priority to using removal-based carbon credit instruments to offset operational emissions, ensuring that it continuously maintains operational carbon neutrality after 2041. Over the longer term, it will actively explore cutting-edge carbon removal technologies such as CCUS and biochar, with plans to steadily advance deep decarbonization across the full value chain from 2051 onward and ultimately achieve the target of full value chain carbon neutrality.

Carbon Management Governance System

Governance Structure

GCL Technology has established a carbon management governance structure with clear responsibilities and well-defined hierarchy, fully integrating carbon management into its corporate governance system.



At the governance level, the Board has established an ESG committee as the highest decision-making body for carbon management, responsible for supervising and reviewing the Group's carbon emissions reduction targets and work progress, conducting regular reviews and putting forward strategic suggestions, and reporting to the Board.

At the management level, the Group has established a Sustainability Management Committee, composed of heads of key functional departments and business divisions, responsible for reviewing climate targets and performance metrics, approving decarbonization measures across the entire value chain, dynamically tracking metrics progress, and ensuring the effective implementation of targets.

At the execution level, the Group has established an ESG task force, responsible for tracking target progress, refining and improving the performance metrics, executing and following up on the annual carbon management plan, and ensuring that all measures are implemented to form a closed-loop management system in place for continuous improvement.

Carbon Emissions Data Management

GCL Technology has established a carbon emissions data management system covering the full lifecycle, clarifying accounting boundaries and scopes, and standardizing the collection, accounting, and disclosure of carbon emissions data. Through a digital carbon management platform, the Group has connected major production links, creating graded collection, traceability, and evidence preservation of carbon emissions data, and comprehensively supporting carbon target management and sustainable development decision-making.

Internal Carbon Management System and Performance Assessment

GCL Technology will continue to systematically review the management principles, division of responsibilities, work procedures, and audit requirements for carbon emissions data, and deeply integrate carbon emissions management into the Group's comprehensive risk management system and internal control framework. Meanwhile, GCL Technology has clearly established energy conservation and carbon reduction targets. By signing the *Annual Operating Target Responsibility Letters* with heads of all bases and senior executives, the assessment results are directly linked to the compensation incentives of the core management team.

ESG Philosophy and Governance

ESG Philosophy

"Infinity" is GCL Technology's ESG philosophy and commitment to a more sustainable future. With ESG as our core engine, we continue to deepen the development and application of granular silicon technology while actively exploring a "second curve" in materials and energy technologies, aiming to build a green and low-carbon product portfolio, deliver low-carbon value throughout the value chain, and weave a sustainable future through zero-carbon intelligent manufacturing.

In 2025, in alignment with our business roadmap, key ESG topics, and the United Nations Sustainable Development Goals, we continued to focus on the four pillars of "Infinity," 18 key topics, and 19 quantitative targets, systematically advancing key actions by improving topic governance, strengthening strategy execution, and implementing closed-loop target management, with a commitment to creating a future of infinite possibilities and shared infinite value.

Infinity empowers sustainability

Tech Infinity

Driven by technological innovation, we focus on R&D, advance the transformation and evolution of energy, and empower the PV industry to enter a new era.

Talent Infinity

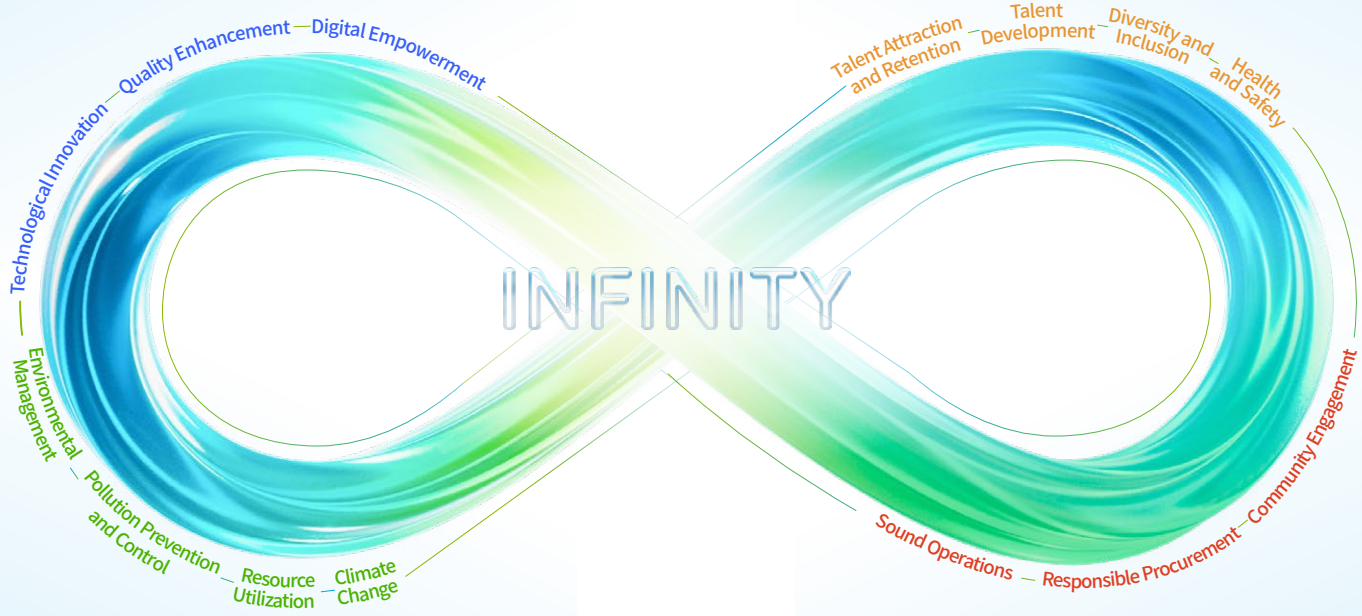
Upholding the culture of "One GCL," we support employees' continuous growth, help employees unlock their potential, and enable them to achieve both career aspirations and personal fulfillment.

Green Infinity

We champion green operations, prioritize ecological protection, actively address climate change, and provide society with infinite greenery.

Value Infinity

We demonstrate corporate value through strong corporate governance and responsible social practices, while embedding sustainability into the industry chain and aligning economic value with social value



ESG Strategies

Pillars	Policy	Commitment
Tech Infinity	*Letter on Responsible Marketing and Consumer Protection* *Technical Transformation Project Management System* *Management Measures for Incentivizing the Commercialization of Technological Innovation Achievements (Trial)* *Intellectual Property Rights Management Measures* *Trade Secret Management Measures*	Committed to increasing investment in clean technologies R&D and safeguarding intellectual property rights. Committed to practicing fair marketing practices, protecting consumer privacy and data security, strengthening consumer education, and ensuring the safety of products and services.
Green Infinity	*Environmental Protection Management Policy* *Measures for Climate Change Response and Sustainable Development Management* *GCL Technology Waste Gas Management System* *GCL Technology Wastewater Management System* *GCL Technology Solid Waste Management System*	Committed to complying with the ecological regulations of operating bases, establishing a sound environmental management system, strengthening waste management, promoting energy conservation and emissions reduction, and achieving the goals of ecological protection and corporate social responsibility.
Talent Infinity	*Code of Business Conduct* *Human Rights Policy* *Employee Rights Protection Policy*	Committed to following international human rights principles, including the *UN Guiding Principles on Business and Human Rights (UNGPs)*, *The Universal Declaration of Human Rights*, and the International Labor Organization (ILO) core conventions and rules, respecting and safeguarding human rights, eliminating discrimination, harassment, and infringement of employee privacy, prohibiting the use of child labor and forced labor, and safeguarding employees' rights to freedom of association and equal pay for equal work.
Value Infinity	*Code of Business Conduct* *Remuneration Management Policy for Directors, Supervisors, and Senior Executives* *Anti-Fraud (Including Anti-Corruption) & Whistleblowing Management Standards and Shareholder Communication Policy*	Committed to operating with integrity, establishing an anti-fraud, anti-corruption compliance and risk management system, improving a transparent compensation framework, encouraging internal whistleblowing, and striving to enhance corporate governance and ethical standards.
	Customer Information Management Standards	Committed to safeguarding customer information security, standardizing end-to-end management procedures for customer information, and improving service quality and information security.
	Sustainable Procurement Guidelines *Code of Social Responsibility Conduct for Supply Chain Partners* *Procurement Management Policy* *Initiative on Water Conservation, Energy Saving and Waste Reduction in the Supply Chain*	Committed to integrating ESG principles into supplier lifecycle management, launching green initiatives to suppliers, monitoring suppliers' fulfillment of responsibilities and performance, and advancing sustainable development of the supply chain.
	Notice on the Formulation of Community Engagement and Development Policy	Committed to actively participating in community building, undertaking social responsibility, and sharing development outcomes with communities through actions such as supporting education, creating jobs, and public health, so as to promote harmonious coexistence between the enterprise and society.

ESG Targets

Achieved ✓ In progress →

Pillars	Corresponding Material Topics	Description	2025 Achievement Status
Tech Infinity	R&D and Innovation	Annual R&D investment in clean technology shall be no less than 5% of annual revenue	✓
	Customer Services	Annual customer satisfaction rate shall be no lower than 90%	✓
Green Infinity[5]	Waste Management	By 2030, annual hazardous waste generation intensity will remain below 0.010 tonne/MW of wafers	✓
		By 2030, annual non-hazardous waste generation intensity will remain below 1.00 tonne/MW of wafers	✓
		By 2030, annual nitrogen oxide emissions intensity will remain below 3 kg/MW of wafers	✓
		By 2030, annual sulfur oxide emissions intensity will remain below 2.5 kg/MW of wafers	✓
		By 2030, annual particulate matter (PM) intensity will remain below 1.5 kg/MW of wafers	✓
	Energy Management	Using 2023 as the baseline year, electricity consumption per unit of silicon-based new material products will decrease by 12% by 2030	✓
	Water Resource Management	By 2026, water usage per unit of polysilicon will decrease by 31.78% compared with 2023 (baseline year)	→
		By 2026, water usage per unit of wafers will decrease by 9.31% compared with 2023 (baseline year)	→
	Climate Change Response	Short-term target: by 2026, Scope 1+2 GHG emissions intensity per unit of product will decrease by 12% compared with 2023 (baseline year), with the target covering all of the Company's business operations	✓
		Medium-term target: by 2030, Scope 1+2 GHG emissions intensity per unit of product will decrease by 18% compared with 2023 (baseline year), with the target covering all of the Company's business operations	→
		Long-term target: achieve operational carbon neutrality no later than 2040 and full value chain carbon neutrality no later than 2050	→
Talent Infinity	Diversity and Inclusion	By 2026, the proportion of female employees will increase to 22%	→
		By 2026, the proportion of female senior management will increase to 18%	→
	Health and Safety Management	0 cases of occupational disease confirmed by authorities Health check-up coverage for employees: 100%	✓
Value Infinity	Business Ethics and Anti-Corruption	By 2026, complete the ISO 37001 Anti-Bribery Management System certification for 2 or more major bases	✓
	Internal Control and Risk Management	By 2026, continue to conduct auditing projects such as internal control evaluations for project companies, centralized procurement audits, and asset compliance, comprehensively assess operational management and compliance risk, identify potential value, and enhance management efficiency	✓

[5] This data is based on the Group existing product businesses in 2025, including polysilicon, silicon wafers, and other related products.

ESG Governance and Management

Board Statement on ESG

The Board of GCL Technology fully recognizes that systematically integrating ESG into the Group's operations and management is not only an inevitable choice to align with the global trend of sustainable development, respond to regulatory policies, and meet the expectations of various stakeholders, but also a strategic cornerstone to guide the Group in building long-term resilience, creating sustainable value, and enhancing core competitiveness. Therefore, the Board has incorporated ESG management into the core of the Group's operations and management.

To ensure the effective implementation of the ESG strategy, GCL Technology has established a three-tier governance structure of the governance level, management, and execution level. As the highest decision-making body, the Board is responsible for reviewing the ESG strategy and major ESG efforts, while the ESG Committee established under the Board is responsible for overseeing and guiding the Group's day-to-day sustainable development efforts.

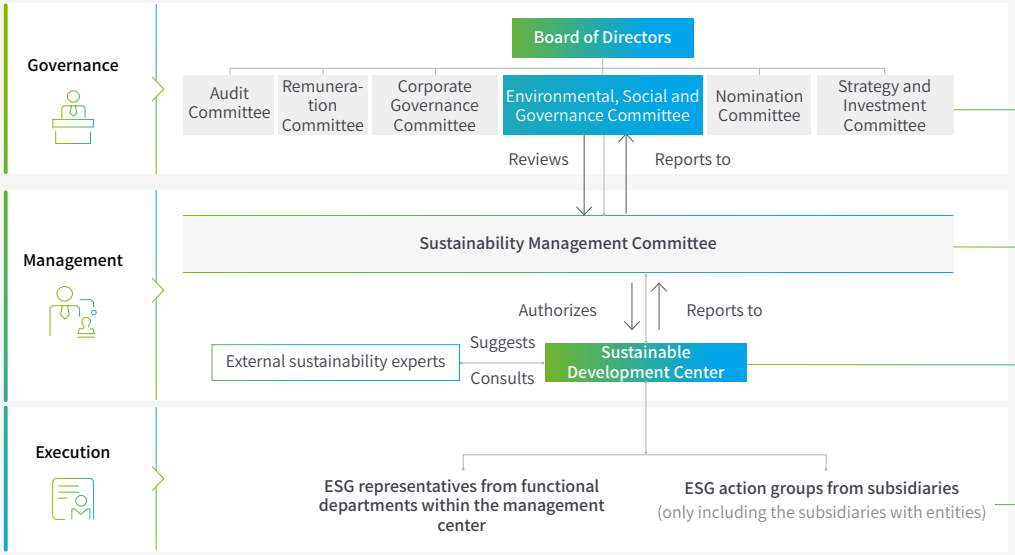
We are committed to continuously improving the ESG management system, constantly optimizing the framework of ESG policies, procedures, and workflows, closely monitoring ESG development trends and macro-level dynamics in China and abroad, and maintaining active engagement with internal and external stakeholders. We undertake that GCL Technology will closely follow the latest requirements of external ESG-related policies, initiatives, guidelines, and other documents, regularly conduct self-assessment and management optimization, ensure that the Group's ESG practices comply with the latest standards, and allocate resources reasonably according to material topics to ensure the effective management of key topics.

This report provides a detailed and truthful disclosure of the progress and achievements of GCL Technology's ESG work for 2025, and was reviewed and approved by the Board on April 10th, 2026. The Board and all directors of the Group affirm that this report contains no false records, misleading statements, or major omissions, and accept individual and joint liability for the authenticity, accuracy, and completeness of its contents.

ESG Governance

GCL Technology strictly complies with HKEX's *ESG Reporting Code* and the requirements of leading international rating agencies, has established a three-tier ESG governance structure centered on the governance, management, and execution levels, formulated the *Sustainable Development System Management Policy*, clarifying ESG responsibilities across all organizational levels, and systematically advances sustainable development initiatives. As the highest decision-making body for ESG, the Board assumes ultimate responsibility for the ESG strategy, targets, and performance. The ESG Committee established under the Board is responsible for coordinating, overseeing, and guiding the Group's overall sustainable development work, including reviewing and approving climate strategy, identifying material climate risks and opportunities, and reporting regularly to the Board. In day-to-day management, under the guidance of the ESG Committee, the Sustainability Management Committee is responsible for reviewing the ESG indicator system, approving management objectives and annual plans, tracking progress on topics such as climate change, coordinating resources, and driving the implementation, evaluation, and continuous improvement of various ESG measures.

GCL Technology ESG Governance Structure



Responsibilities of Each Level

	Responsibilities	Meeting Frequency
ESG Committee Lan Tianshi、Yeung Man Chung, Charles、Shen Wenzhong (Chairman)、Ho Chung Tai, Raymond、Li Junfeng、Yip Tai Him	• Acts as the highest governing body for ESG oversight and decision-making • Reviews and approves the Group's ESG strategy, short-, medium-, and long-term planning, policies and their implementation, and annual ESG report • Monitors the progress of material ESG topics and target achievement • Identifies and approves ESG-related risks and opportunities	At least 4 times per year
Sustainability Management Committee	• Composed Joint CEOs, the heads of key functional departments of the Administrative Management Center, and the heads of each business division • Serves as the core management body for ESG, chaired by a Joint CEO, and is responsible for reviewing ESG strategies, planning, targets, and policies • Assesses progress on ESG topics, makes recommendations, and allocates resources to ensure the achievement of ESG goals	At least 4 times per year
Sustainable Development Center	• Oversees ESG progress across departments and provides regular analysis and updates on ESG indicators to the core management • Leads ESG disclosure efforts and consolidation, reviews ESG reports, and submits them to leadership and the board	Weekly meeting
ESG Task Force	• Supports the Sustainable Development Center in project implementation and ESG disclosure • Executes ESG initiatives and ensures performance targets are met	Meetings held as needed based on project progress

ESG Management

To build a systematic ESG management framework, GCL Technology has integrated the *ESG Reporting Code* of HKEX, the *Guidelines No.14 of Shanghai Stock Exchange for Self-Regulation of Listed Companies—Sustainability Reporting (Trial)*, the *IFRS Sustainability Disclosure Standards S1 and S2*, the Hang Seng Corporate Sustainability Index Series, MSCI ESG Ratings, S&P Global Corporate Sustainability Assessment (CSA), and the Carbon Disclosure Project (CDP), the seven major guidelines, standards, and capital market ratings, continuously optimized its ESG indicator system, and assigned responsible entities through the *Measures for the Administration of the ESG Indicator System* to achieve closed-loop management.

In 2025, GCL Technology made a series of advances in deepening ESG systems and advancing practical initiatives. We jointly issued the *Global Joint Initiative for Sustainable Development of the Photovoltaic Industry* with peer companies to promote industry-wide progress and continued to improve the sustainable procurement system. At the same time, we established carbon management systems covering the full lifecycle and set medium- to long-term greenhouse gas (GHG) emissions reduction targets. We actively participated in training sessions organized by international institutions to continuously enhance our ESG management capabilities in key areas such as climate change and diversity and inclusion.

Jointly Issued the *Global Joint Initiative for Sustainable Development of the Photovoltaic Industry* with Peer Companies

Statement of Conformity to ISO 20400

SA8000 Certification

Participation in UN Global Compact Training to Enhance ESG Management Capabilities

In April 2026, GCL Technology participated in and completed the United Nations Global Compact (UNGC) "Climate Ambition Accelerator" and "Target Gender Equality Accelerator" training programs. Through systematic learning, the Group further integrated international best practices into its own operations. This not only facilitated the development of a more robust carbon management system and emissions reduction targets, but also improved internal diversity and inclusion policies, thereby strengthening management capabilities and implementation effectiveness in both climate action and workplace equality.

Certificates of completion for the "Climate Ambition Accelerator"

Certificates of completion for the "Target Gender Equality Accelerator"

During the reporting period

The ESG Committee held
4 meetings

The Sustainability Management Committee held
8 meetings

The Sustainability Center conducted more than
50
regular working sessions

The discussion topics covered
42 items
including corporate governance and business conduct, climate change response, and product carbon footprint

During the reporting period

The Group proactively commissioned third-party GSSA-ESG audits for four polysilicon bases, namely Inner Mongolia Xinyuan, Inner Mongolia Xinhuan, Jiangsu Zhongneng, and Leshan GCL, all of which were recognized as the highest

A rating

In addition, GCL Technology has received a statement of conformity to ISO 20400 Sustainable Procurement Guidelines

5 companies

obtained SA8000 certification for the Social Responsibility Management System, including the Administrative Management Center, Jiangsu Zhongneng, Xuzhou Photovoltaic, Ningxia Photovoltaic, and Leshan GCL.

Stakeholder Engagement

GCL Technology places great importance on engagement with all stakeholders. We are committed to building and maintaining a transparent, efficient, and ongoing two-way engagement mechanism, listening to the concerns of all parties through diversified channels and integrating feedback into our decision-making and operational practices, striving to respond to the expectations of all parties across the environmental, social and governance dimensions and create shared value. In 2025, building on the existing foundation, we further expanded the breadth and depth of our engagement, continuously enhancing the transparency of disclosures and the effectiveness of interactions through diversified engagement activities, and working together with stakeholders to advance sustainable development.

Stakeholder Engagement Approach

Stakeholders	Key Expectations		Engagements		2025 Highlights
Customers	• Product quality and safety • R&D and innovation	• Customer services	• On-site visits • Meetings	• Customer appreciation events	Conduct regular performance metric benchmarking with customers. Rooted in customer sites, we track the application process of polysilicon to provide internal direction for improving product quality and support product quality upgrades. Comprehensively improve the quality of granular silicon products to meet the increasingly stringent current market and customers' needs and continuously enhance the market competitiveness of granular silicon products.
Employees	• Employee rights protection • Diversity and equal opportunities • Employee benefits and care	• Health and safety management • Training and career growth	• Regular meetings • All-hands meetings	• Performance review meetings • Internal publications	Convene employee representative meetings **24** employee forums **900** employee suggestions, with an issue resolution rate of over **95%** **1** employee satisfaction survey Annual employee complaints totaled **0**
Shareholders & investors	• Corporate governance	• Compliant and stable operations	• Investors' meetings • Broker-hosted online conferences • Online industry conferences	• Financial results presentations • Press releases/ announcements • On-site visits	**985** investor engagement activities **4** ESG committee meetings **1** shareholders' general meeting **37** board meetings **19** board committee meetings including **4** ESG committee meetings **61** external announcements
Suppliers & partners	• Responsible procurement • Product quality and safety	• Industry collaboration and development	• Suppliers' conferences • Supplier training	• Supplier visits • On-site project communication	Conducted **152** supplier training sessions, totaling **193** hours **518** suppliers participated in the training **50** suppliers underwent ESG due diligence **518** suppliers participated in the ESG capacity-building program
Government and regulatory agencies	• Corporate governance • Stable compliance operations • Internal control and risk management	• Business ethics and anti-corruption • Sustainability management • Information security and privacy protection	• On-site visits • Meetings	• Press releases/ public reports	Participated in **56** meetings and received **48** visits, hosting approximately **502** visitors
Industry associations	• Product quality and safety • Intellectual property protection	• R&D and innovation	• On-site visits • Meetings	• Suppliers' conferences • Industry exhibitions	Participated in **4** industry association conferences, including the SNEC PV+ Conference, the International Perovskite Photovoltaic Industry Conference, the China (Leshan) Silicon Industry Chain Development Conference, and the China International Photovoltaic and Energy Storage Industry Conference
Communities & NGOs	• Climate change response • Energy management • Water resource management • Materials and packaging management • Environmental management	• Biodiversity protection • Wastewater management • Waste gas management • Community investment and philanthropy • Industry collaboration and development	• On-site visits • Meetings	• Press releases/ public reports	Participated in the 2025 Global Sustainable Leaders Summit Formally became a signatory to the Taskforce on Nature-related Financial Disclosures (TNFD) Participated in philanthropy and volunteer services, with a total of **40** participants Jointly launched the "2025 Himalayan Guardians Conference and the 2nd Beautiful Convention Pioneers Action"
Media	• Corporate governance • Community investment and philanthropy	• Industry collaboration and development	• Press releases/ announcements • Conferences • Exhibitions	• Luncheon meetings • Appreciation events • Management interviews	During the year, the Company organized more than **10** media interviews with management, published more than **400** corporate news articles, and organized **6** media exchange activities in Suzhou, Xuzhou, Leshan, Hohhot, Baotou, and other locations
Academics/ experts/ professional organizations	• Technological innovation • Green energy R&D • Sustainability management	• Climate change response • Energy transition • Responsible procurement	• Conferences • Exhibitions	• Management interviews • Press releases/ public reports	Participated in more than **20** global climate change and sustainable development exchange activities

Stakeholder Engagement Highlights in 2025

As a co-initiator, we joined hands with the world's leading PV manufacturers to release the *Global Joint Initiative for Sustainable Development of the Photovoltaic Industry*.

May

Attended the 2025 China Industrial Transfer and Development Matchmaking Event (Sichuan) and delivered remarks, sharing GCL's achievements since expanding into Sichuan and looking ahead to the future trajectory of its industry development in Sichuan province.

May

Attended the 2025 China (Leshan) Silicon Industry Chain Development Conference and, under the theme of "Driving cost reduction and efficiency improvement through Technological Innovation while forging ahead through industry synergies," provided an in-depth analysis of the challenges and opportunities currently facing the silicon industry chain.

June

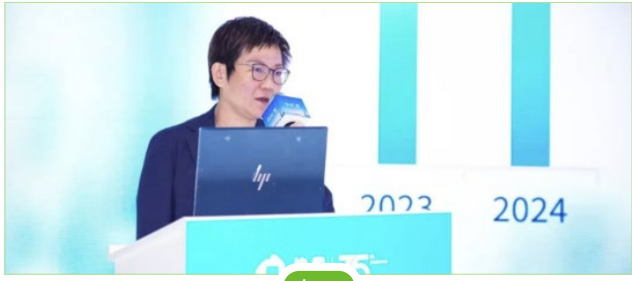
Attended the "2025 Sustainable Global Leaders Conference" and engaged in an in-depth dialogue under the theme of "Jointly charting a new vision for global environmentally Sustainable Development."

October

Attended the "Climate Just Transition Roundtable" hosted by the United Nations Global Compact (UNGC), where participants discussed the future pathways for a just transition and shared Chinese enterprises' green innovation and practices.

July

Showcased at the 18th (2025) SNEC PV+ International Photovoltaic and Energy Storage Technology and Equipment Conference and Exhibition (Shanghai), comprehensively showcasing its technology leadership in the field of solar PV materials and its low-carbon innovative achievements.



June

Actively participated in the 2025 International Energy Transformation Forum and the 7th Future Energy Conference, engaging in discussions centered on three core topics: overseas investment, international cooperation, and green finance.

October

Attended the "2025 Group of Twenty (G20) Entrepreneurship Roundtable Dialogue" and delivered a speech in the session on "Entrepreneurship, corporate social responsibility (ESG), and young entrepreneurs."

November

Attended the 8th China International Photovoltaic and Energy Storage Industry Conference and engaged in dialogue on "Breakthroughs in photovoltaic and energy storage Technological Innovation and talent ecosystem development."

November

Attended "The Year Ahead 2026" Summit hosted by Bloomberg "Business Week", and participated in a roundtable dialogue on the topic of "Sustainable Finance and Corporate Green Transition" at the "Technology and Sustainability" thematic forum.

November

Management of Materiality

To systematically respond to internal and external expectations, GCL Technology has established a materiality assessment mechanism. With reference to requirements including the HKEX's *ESG Reporting Code*, and building on prior years' materiality assessment results, we refined the materiality analysis process in light of the Group's latest strategic direction and internal and external feedback, to ensure it reflects the environmental, social, and governance topics most important to the Group and stakeholders. The optimized topic matrix serves as the core of management priorities and report disclosures, ensuring the report's materiality and completeness.

Optimized Workflow for Material Topics

Topic Identification	Refine and adjust the original topics considering regulatory requirements, the Company's strategy, industry trends, and peer practices.
Stakeholder Interview	Conduct interviews with key stakeholders such as investors, customers, and suppliers to identify stakeholder priorities.
Validation and Review	Based on internal and external views, determine the priorities of materiality and submit them to the ESG Committee for review and confirmation.

To ensure the quality and credibility of this report, we adhere to the following core principles in making disclosures:

GCL Technology's ESG Reporting Principles

Materiality

GCL Technology implements the materiality assessment process to identify ESG topics of concern to stakeholders and the Company's senior management, and then determine the final materiality, which serves as the targets and foundation of the Group's sustainability strategy.

Quantitative

GCL Technology has established an ESG indicator system covering all bases, and regularly compiles key quantifiable disclosure indicators, including all "Environmental" aspects and some "Social" aspects in the *ESG Reporting Code*, with annual consolidation for inclusion in this report's external disclosures. For ESG quantitative data, please refer to the relevant sections of this ESG Report.

Balance

Reviewed and confirmed by the Board, GCL Technology is committed to ensuring that the report content is objective and transparent, and that the disclosed information is available through the Company's official disclosure channels or public media.

Consistency

Any changes in the statistical methodologies for relevant disclosures in this report compared with previous years' ESG Reports have been explained. For multi-year comparative ESG data, please refer to the relevant sections of this ESG Report.

GCL Technology's 2025 ESG Material Topics Matrix

- 1 R&D and Innovation
- 2 Product Diversity
- 6 Product Quality and Safety
- 10 Industry Cooperation and Development
- 15 Intellectual Property Protection
- 17 Customer Service

Tech Infinity

- 4 Responses to Climate Change
- 5 Energy Management
- 11 Environmental Management System
- 12 Waste Management
- 13 Water Resource Management

Green Infinity

- 7 Employee Rights Protection
- 8 Health and Safety Management
- 14 Employee Benefits and Care

Talent Infinity

- 3 Strengthening Risk and Internal Control
- 9 Business Ethics and Anti-Corruption
- 16 Responsible Procurement
- 18 Community Development

Value Infinity

ESG Highlights of 2025

—GCL Infinity: ushering in a new era of infinite technology and value

Tech Infinity

R&D and Innovation

Increase in R&D investment

Total R&D investment reached

RMB850million

(USD 121 million)

accounting for

5.89%

of the annual revenue

Growth in both R&D personnel and project numbers

The R&D team expanded to

2,161employees

with a cumulative total of

12

R&D projects pursued throughout the year

Collaborative innovation

Jointly with universities, research institutes, and external enterprises, a cumulative total of

12

R&D projects were conducted

Titles received

11 National High-Tech Enterprises

1 National 5G Factory

4 National Green Factory

1 Industrial Internet Benchmark Enterprise

Product Quality and Safety

Quality-related incidents

zero

Annual quality-related incidents occurred across all bases

Quality management certification

12

stable operating entities eligible for certification passed the

ISO 9001 Quality Management System certification

achieving a coverage rate of

100%

Increase in the number of internal and external audits

30 Internal quality audits were conducted

28 External audits were conducted

Quality training

Quality-themed training sessions reached

3,169

covering

22,886

participants

Customer Services

Improved customer satisfaction rate

Annual average customer satisfaction score was

94.89

Customer satisfaction survey response rate was

100%

Decline in customer complaints

The annual number of customer complaints for polysilicon and wafers was

0

Intellectual Property Protection

Record high patent applications

Total patent applications reached

1,910

1,398

Patents were granted

Enhanced employee awareness

4

Specialized training sessions were organized

The signing rate of the *Special Technology Confidentiality Agreement* among confidential personnel in key positions reached

100%

Industry Collaboration and Development

Strengthened external cooperation

7

Technical pathway breakthroughs were completed jointly with external partners

5

Projects were advanced in collaboration with an AI materials R&D Company

Green Infinity

Energy Management

Enhanced energy conservation

All bases actively pursued energy-saving technical upgrades such as process innovations, operational optimizations, and technological upgrades, achieving electricity savings of approximately

71,317 MWh

while the overall intensity of comprehensive energy consumption was

78.70 MWh/MW of wafer

down

3.62% YoY

Clean energy adoption

Total renewable electricity usage for the year reached

4,512,836 MWh

up

64.63% YoY

Water Resource Management

Water risk assessment

Water risk assessment is conducted annually, with the overall level at medium level of risk, and no high risk identified among the

14

operating bases

Increased use of alternative water sources

Industrial water recycling reached an industry-leading level, and the overall percentage of alternative water source use reached

76.48%

Water conservation

Annual water conservation reached

3,753,700 tonnes

up

166% YoY

Waste Management

Zero wastewater discharge

Lnner Mongolia Xinyuan, achieved

"zero discharge"

of industrial wastewater

Compliance of waste management emissions

The synchronous operation rate of environmental treatment facilities and production equipment was

100%

The compliance rate of waste discharge was

100%

Waste management emissions reduction

Wastewater emissions were down

1,850,000 tonnes

YoY

Non-hazardous waste emissions were down YoY by

5,227 tonnes

Climate Change Response

Risk assessment

Established a full value chain climate risk assessment framework, completed scenario analysis and risk assessment for all business types, and identified the financial implications

Carbon inventory

Verification was completed at

5 bases

covering Scope 1, 2, and 3 emissions

Environmental Management

System certifications

12

Steadily operating production bases eligible for certification were audited and found to meet ISO 14001 requirements, obtaining the corresponding certification certificates

with coverage reaching

100%

Environmental audit

12

Internal environmental audits

12

External environmental audits

covering all operating bases

Environmental protection training

Participation in environmental protection training exceeded

46,700 participants

with total training duration exceeding

41,800 hours

Title recognition

Leshan GCL, Jiangsu Zhongneng, Xuzhou Photovoltaics, and Funing GCL were recognized as National Green Factory

International cooperation

Officially became a signatory to the Taskforce on Nature-related Financial Disclosures (TNFD)

Talent Infinity

Talent Attraction and Retention

Employee recruitment

714 employees
were recruited during the year, further broadening recruitment channels

Internal mobility

Launched the "FlowingWater Plan" to promote internal talent mobility, with internal candidates accounting for
3.4%

a year-over-year increase of
2.3%

Talent incentives

Shares were granted to 40 employees
271.73 million

Employee benefits

100%
of employees, including full-time, part-time, and contract employees, were provided with benefits protection in addition to remuneration

Talent Development

Talent development

Developed "GCL 5 Journey" Skills and Knowledge Development Training System, the annual number of training participants was
8,253

with coverage
100%

Annual training expenditure amounted to
RMB 4.1315 million

Total training hours for all employees reached
442,073 hours

Average training hours per employee
53.57 hours

Talent development

133 employees
obtained various professional qualification certifications

Joint education program

25 employees
completed their studies under the joint education program with Jiangsu University

Diversity and Inclusion

Diversity measures

DEI training was provided to all employees, covering all operating bases

Female employees

The proportion of female employees
20.31%

Female employees in management
15.55%

Female employees in senior management
15.25%

Female employees in STEM departments
15.55%

Female employees in revenue-generating departments
36.67%

Employees with disabilities

Recruited employees with disabilities
7

Total number of employees with disabilities
30

Employee communication

24
Discussion sessions were held

79
Employee suggestions were collected and all were implemented

Health and Safety Management

System certifications

Steadily operating production bases eligible for certification
12

were audited and found to comply with the requirements of ISO 45001, and obtained the corresponding certification certificates, with coverage reaching
100%

5 companies
obtained SA8000 Social Responsibility Management System certification

Safety training

Employee and contractor safety training coverage
100%

Number of employee emergency drill sessions
2,834

Number of contractor emergency drill sessions
65

Safety inspections

Safety inspection surveys
40

Achieved a hazard rectification rate of
100%

Value Infinity

Internal Control and Risk Management

Internal control and audits

The total of
25
internal control and audit reviews

2
External reviews by third-party agencies were conducted

Identify internal control issues
319

Medium- and high-risk items
102

Corrective follow-ups required rectification
284

Awareness training

Employee coverage for internal control and risk management training sessions reached
100%

Responsible Procurement

System establishment

Achieved verification of conformity with ISO 20400 Sustainable Procurement Guidelines.

Secured 100% signing rate by core suppliers to the *GCL Group Code of Social Responsibility Conduct for Supply Chain Partners*.
100%

Supplier due diligence

Completed ESG due diligence on
50suppliers

Identify areas for improvement
593

Organized
518suppliers
to participate in a long-term ESG capacity-building program

Supplier empowerment

Training sessions
152

Totaling
193hours

Reaching
518suppliers

Issued the *Initiative on Water Conservation, Energy Saving and Waste Reduction in the Supply Chain* to strengthen water resource management, energy management, and waste management.

Business Ethics and Anti-Corruption

Number of negative incidents

The number of non-compliance incidents such as lobbying or political financing activities, corruption and bribery, and unfair competition was
0

System certifications

Inner Mongolia Xinyuan and Jiangsu Zhongneng have obtained ISO 37001 Anti-Bribery Management System certification

Business ethics training

Business ethics training sessions totaled
18,816hours

With average hours of training per employee reaching
2.28hours

With coverage reaching
100%

Community Development

Public welfare investment

Community investment and philanthropy programs totaled
RMB2.0059million

Employees participated in volunteer service for
40participants

Aid to disaster-stricken areas

233employees

01

Tech Infinity

Technological Innovation | Quality Enhancement | Digital Empowerment

SDG Goals Addressed in This Chapter

Driven by continuous technological breakthroughs, GCL Technology reshapes the landscape amid change and pioneers new paths through innovation, continuously scaling new technological heights and striving to contribute cleaner, low-carbon system solutions.

TECH INFINITY

Technological Innovation

GCL Technology regards R&D accumulation and principle-based explanatory methodology as its foundation, continuously exploring frontier technologies and making them the core driving force for sustainable development. To continuously stimulate innovation capabilities, the Group constantly optimizes its technology breakthrough framework, improves its innovation governance mechanism, strengthens the protection of independent intellectual property rights, and promotes internal and external collaboration, working with the industrial ecosystem to achieve common development.

R&D Innovation

GCL Technology strictly complies with the *R&D Project Management Regulation*, the *Management and Reward Measures for Science and Technology Achievements*, and other relevant policies, and continuously improves its technological innovation R&D system. Through regular revisions to the *Technology Transformation Projects Management Standards*, the Group provides systematic support for the standardized conduct of R&D activities.

In the field of clean technology, GCL Technology continues to strengthen its R&D investment. The Group formulates clear R&D plans and targets each year, provides sufficient financial support, and continuously stimulates the innovation vitality of its talent through mechanism design. Based on business characteristics, current R&D resources are mainly focused on frontier directions such as the continuous improvement of granular silicon quality and the development and utilization of silicon derivatives.

2025

Total R&D investment amounted to
RMB 850 million
(USD 121 million)

Accounting for
5.89%
of annual revenue

Targets	2025 Target Achievement
Annual R&D investment in clean technology shall be no less than 5% of annual revenue	Achieved

R&D Team

GCL Technology has established the Global Silicon-based Materials Research Institute, comprising four major R&D branches as well as a research center and a design center in the United States. Covering key links across the upstream and downstream industry chain—including raw materials, process equipment, production technology, product quality, and application scenarios—it is committed to overcoming core technology and promoting the coordinated development of practical technologies and frontier research, thereby rapidly enhancing the market competitiveness of its products.

The R&D team focuses on key material fields, continuously optimizes its talent structure, actively introduces high-caliber external R&D talent, and emphasizes the integration and allocation of internal resources, thereby systematically strengthening its overall R&D strength.

As of 2025

The Group's R&D team had reached
2,161 persons

Innovation Incentives

In 2025，GCL Technology implemented the *Interim Measures for the Incentive Administration of the Commercialization of Technological Innovation Achievements（Trial）* and the supporting incentive system for R&D achievements, clarifying the reward principles and standards for each innovation stage and commercialization link, and providing a institutional basis for incentive work. Through the "case-by-case" mechanism, the Group determines customized incentive plans and amounts at the project initiation stage, and effectively stimulates the innovation drive of R&D personnel through the comprehensive use of research funds, annual performance awards, instant rewards, and other methods.

Innovation Achievements

In 2025, the Group carried out 12 R&D projects, among which the pilot-scale trial development of a solid catalyst and adsorbent development have been completed, while multiple R&D initiatives - including a liquid catalyst, silicon nitride synthesis, and the evaluation of the activation of silicon powder - are being continuously advanced.

Progress of GCL Technology's Key Innovation Projects in 2025

Silicon Powder

- **Evaluation of silicon powder activity:** accurately evaluate the activity of silicon powder feedstock and screen feedstock with higher activity; increase the hydrogenation conversion rate to above **35%**; develop a lower-cost catalyst; and design a new process and a new reactor to carry out the hydrogenation reaction of by-product silicon powder from granular silicon.

Granular Silicon

- **Adsorbent development:** based on the characteristics of impurities in gaseous raw materials for granular silicon, design new high-efficiency adsorbents for impurity removal; independently developed the production process package for adsorbents; through structural modification of internal components of production equipment, energy use efficiency increased by **30%**, reducing the production cost of adsorbents; established a production line with an annual output of **1,000 tonnes** of adsorbents for boron and phosphorus removal, and promoted their application at bases including Inner Mongolia Xinyuan and Inner Mongolia Xinhuan.
- **Solid catalyst pilot trial:** completed the development of a new high-efficiency reactive distillation catalyst and process package; the new solid catalyst has a longer lifespan and can substantially save on raw material procurement costs and shutdown maintenance costs; build a new **1,000 m^3** pilot line for the new solid catalyst; optimization of the pilot unit is currently in progress to enhance unit capacity.
- **High-boiling cracking catalyst:** for slurry high-boiling sections under different process conditions, developed different series of impurity-removal complexing agents; independently developed the production process package for new high-efficiency complexing agents; after developing and applying the new complexing agents, the conversion rate of high-boiling substances was significantly improved, the consumption of cracking agents was reduced, and wastewater generation was decreased. At present, optimization of complexing agents and cracking agents is being carried out according to the differences among all the bases.

Silicon Derivatives

- **Silicon nitride synthesis:** using the Company's low-cost high-purity silicon powder to produce silicon nitride powder, creating greater value from silicon powder; silicon powder conversion rate ⩾ **99.9%**, α-phase content of silicon nitride powder ⩾ **90%**, purity of silicon nitride powder ⩾ **4N**, and pilot trial is currently in progress.
- **Synthetic quartz sand:** using the Company's low-cost high-purity silicon powder to synthesize high-purity quartz sand, whose purity can meet photovoltaic-grade and electronic-grade standards, and whose cost has significant market advantages; a pilot line with an annual output of **100 tonnes** of high-purity quartz sand has been completed. Optimization and modification of the pilot unit are currently underway to improve product quality.

Intellectual Property

Intellectual property is a core strategy for GCL Technology in building barriers to global competition and an important foundation for ensuring a sound and orderly internal R&D environment. The Group strictly complies with the *Patent Law of the People's Republic of China*, the *Trademark Law of the People's Republic of China*, and other relevant laws and regulations. It has formulated the *Intellectual Property Rights Management Measures* and *the Trade Secret Management Measures*, and has added internal policies such as the *Intellectual Property Review Management System* in 2025, continuously improving its intellectual property management system. Through systems, it safeguards innovation, and through protection, it drives development, providing solid support for technological innovation and global market expansion.

In 2025, GCL Technology established and implemented a tiered review mechanism for innovation proposals and a patent risk prevention and control mechanism. In terms of review, by forming a joint review team covering technology, business, intellectual property, and confidentiality functions, the Group conducted comprehensive technical, legal, and confidentiality assessments of innovation proposals, achieving synchronized advancement of proposal classification and targeted protection. In terms of risk prevention and control, the Group established a weekly dynamic monitoring mechanism for patents and systematically carried out technology correlation analysis and infringement risk assessment, thereby forming a closed-loop intellectual property management system that covers both internal and external matters and spans both pre-event and post-event stages.

GCL Technology conducted multi-level and normalized training sessions on intellectual property protection and risk prevention. In 2025, the Group organized special training sessions for all employees on confidentiality standards and patent risk knowledge, integrating practical scenarios such as enhancing employee awareness, refining business processes, and onboarding new employees. A total of four special training sessions were organized, effectively strengthening all employees' confidentiality awareness and risk prevention capabilities. At the same time, for confidential personnel in key positions, the Group organized the special execution of the *Special Technology Confidentiality Agreement*, strengthening accountability implementation at key links and the technology confidentiality mechanism.

Intellectual Property Training Session Site

GCL Technology 2025 Patent Applications and Grants

Total Number of Patents

Total Applications	Total Grants	New Applications	New Grants
1,910	1,398	253	179

Invention Patents

Total Applications	Total Grants	New Applications	New Grants
927	487	71	40

Utility Model Patents

Total Applications	Total Grants	New Applications	New Grants
982	910	182	139

Design Patents

Total Applications	Total Grants
1	1

Special Event on the "Full-Chain Upgrade Initiative for Intellectual Property Offense and Defense"

In April 2025, GCL Technology actively responded to the call of International Intellectual Property Week and successfully held the "Full-Chain IP Attack-Defense Upgrade Action" special event in Leshan. The event was attended by Lan Tianshi, Joint CEO of the Group, Jiang Limin, Chief Scientist, Ge Xiong, Deputy Chief Engineer, heads of R&D at all bases key personnel from the tech function, external experts, and colleagues from relevant departments. Participants engaged in in-depth exchanges and discussions on intellectual property protection and strategic application, promoting the development of systematic capabilities integrating both offense and defense in intellectual property.

GCL Technology Intellectual Property Themed Event

GCL Technology actively advocates and works with industry partners to jointly build a healthy, open, and sustainable ecosystem for intellectual property protection. By sharing practical achievements and collaborative innovation in mechanisms, the Group help foster an industry consensus on respecting innovation and compliant development, driving the industry chain as a whole toward a higher level of innovation and collaboration, thereby injecting lasting momentum into the industry's long-term healthy development.

GCL Technology Proposes Revisions to the *Draft Initiative on Intellectual Property Protection in the Photovoltaic Industry*

In December 2025, taking into account the characteristics of its expertise across the industry chain, GCL Technology proposed at the annual meeting of the Intellectual Property Committee of the China Photovoltaic Industry Association that provisions related to the protection of trade secrets be added to the *Draft Initiative on Intellectual Property Protection in the Photovoltaic Industry*. This proposal was adopted and formally incorporated into the initiative.


Annual Meeting of the Intellectual Property Committee of the China Photovoltaic Industry Association

Quality Enhancement

GCL Technology continuously improves its quality management system by refining internal product control standards implementing customized quality requirements, and proactively raising inspection benchmarks, thereby systematically enhancing product quality and service quality. The Group remains guided by customer expectations, achieving closed-loop improvement across the full lifecycle of quality management and enhancing customer satisfaction and trust.

Product Quality

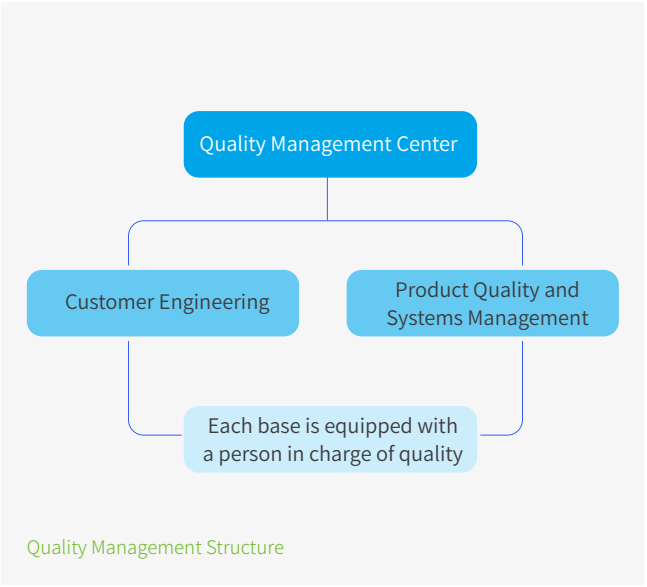
GCL Technology has established a full-lifecycle quality management system covering incoming raw and auxiliary materials, production processes, and final product control, and continuously improves the maturity of its quality management system. By refining quality inspection protocols and linking performance evaluations with remuneration, the Group systematically ensures the high-quality delivery of products and service. In 2025, GCL Technology's 12 production bases with stable operations and the requisite certification qualifications passed the audit against the ISO 9001 Quality Management System requirements and obtained the corresponding certificates, with coverage reaching 100%.

Policy Framework

GCL Technology has formulated core management policies including the *Quality Management Policy* and the *Quality Management System Performance Evaluation Criteria*, and revised related procedural policies including the *Product Engineering Change Management System* and the *Client-Side Product Validation Management System* in this year. In light of actual conditions, all bases have improved and adjusted their quality management specifications, production line planning and handling procedures, raw and auxiliary materials acceptance standards, final product control documentation, and shipment management requirements.

Organizational Structure

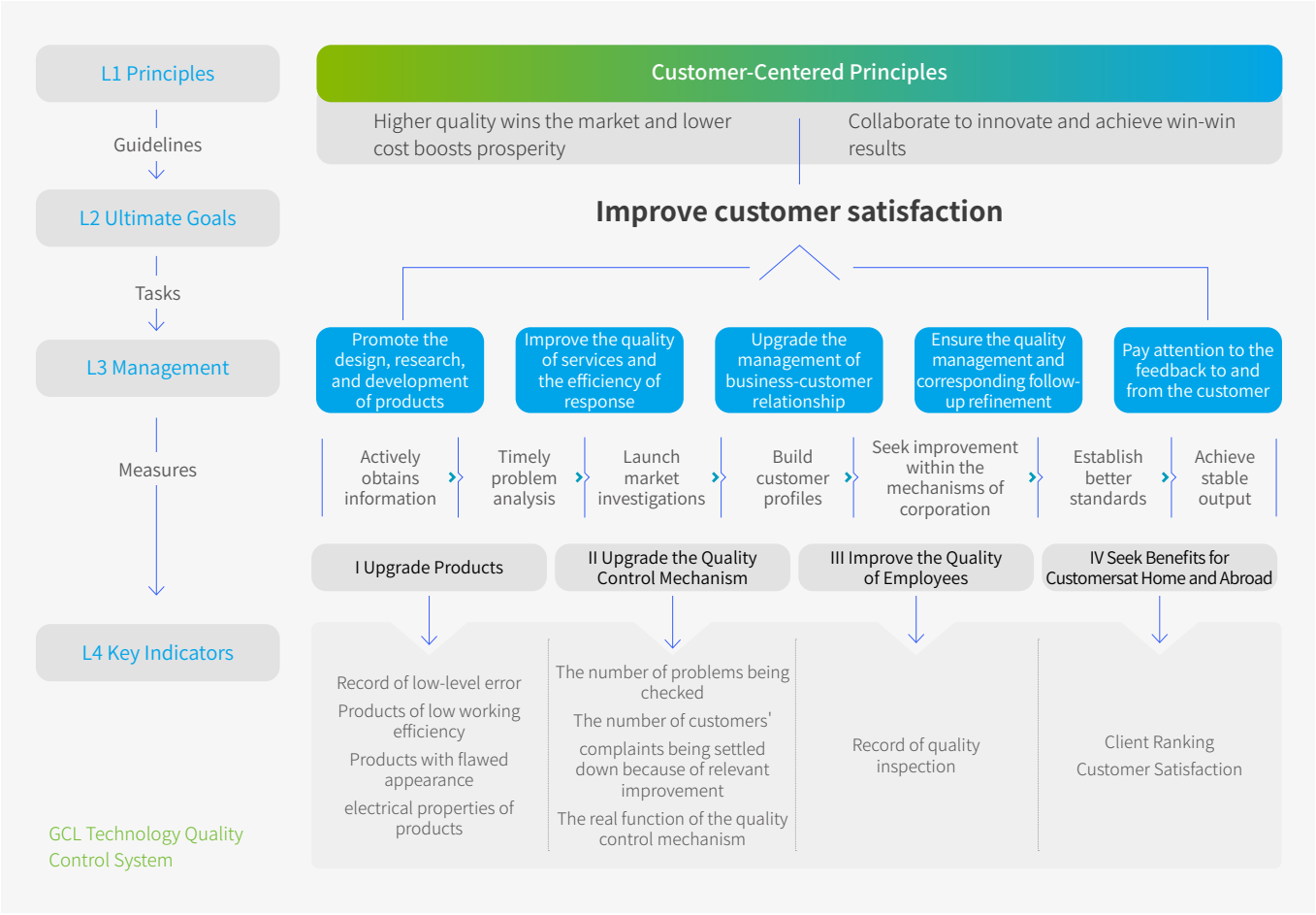
GCL Technology adopts a centrally coordinated model for quality management, under which the Quality Management Center assumes full responsibility for product quality and customer service quality management. The center includes Customer Engineering, Product Quality, and Systems Management, forming a quality management structure that covers multiple product categories. Each production base is equipped with a person in charge of quality, and relies on systematic management mechanisms to clearly define responsibilities at all levels, effectively ensuring the continuous stability and improvement of product quality.



Quality Management Structure

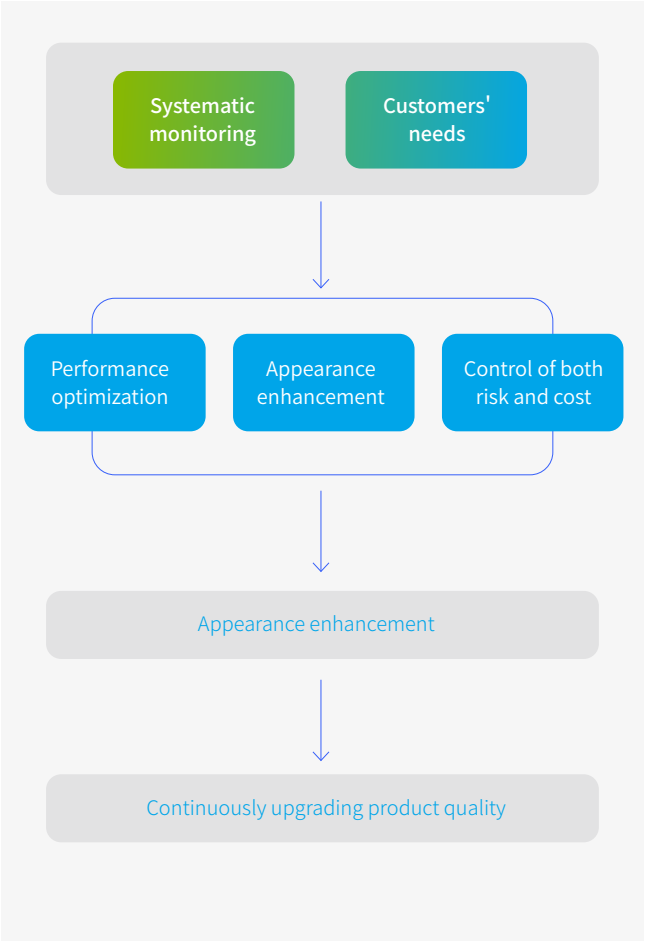
Management System

Based on five major quality development directions—"Process Standardization, Lean Management, Quality First, Normalization of Improvement, and Customer Satisfaction"—the Group has systematically established and continuously refined its quality management system. In 2025, on the basis of fully implementing *the integrated quality policy*, GCL Technology shifted its focus to system integration and internal capability building. By strengthening synergized cross-departmental mechanisms, deepening refined control over processes, and advancing the systematic enhancement of organizational capabilities, it ensured the effective implementation and continuous evolution of the quality policy, providing solid support for building world-leading competitiveness in green smart manufacturing. Given the nature of the industry, GCL Technology does not involve product recall procedures, and no major quality-related incidents occurred in 2025.



GCL Technology Quality Control System

In 2025, GCL Technology focused on three core directions—"Performance optimization, Appearance enhancement, and Control of both risk and cost"—systematically integrating shipment monitoring data, customer feedback, market research, and user profiling analysis to formulate a continuous improvement strategy. As product quality improved steadily, customer retention increased significantly, and the annual growth of the granular silicon market exceeded 22.89%.



GCL Technology's 2025 Highlight Measures for Quality Improvement

Continuous Refinement of Management Processes	• Standard alignment: unified change standards for similar products and establish standardized procedures. • Upgraded control: centralized the management authority for change processes from all bases to the business unit level, established a mechanism for synergized review by professional personnel, unified evaluation standards, and implemented a systematic workflow to ensure effective change control and validation mechanisms. • Improvement in customer satisfaction: promoted the enhancement of product quality and prevented defective products from reaching customers.
Optimization of Raw and Auxiliary Materials Control	• Improved the evaluation mechanism for incoming raw materials and broadened the dimensions for quality inspection. • Optimized inspection standards for key materials and enhanced capabilities for identifying anomalies and covering processes. • Established a real-time incoming materials monitoring system, enabling risk early warning and closed-loop improvement.
Enhancement of Final Product Control	• Added a new quality inspection platform to enable data digitalization and systematic management. By optimizing the performance of testing equipment, it can effectively identify nonconforming product data, thereby ensuring the stability of product quality.
Quality Empowerment Across All Bases	• Promoted all bases to conduct targeted improvements focus on key product indicators, incorporate effective measures into standard process documents, and continuously consolidate improvement results through data monitoring, creating a systematic shift in quality control from emergency response to preventive optimization.
Collective Empowerment of Quality Personnel	• The Group benchmarked automotive industry management system standards, introduced IATF 16949[6] core tools and methodologies, and engaged external experts to deliver specialized training focused on the application logic of the five core tools, enhancing risk control across the full lifecycle from design to production. • Improved the standardized preparation of quality reports, eliminated "superficial rectification," and achieved root cause analysis and closed-loop prevention.

[6] IATF 16949, International Automotive Task Force 16949, is the global quality management system standard for the automotive industry.

Quality Targets

GCL Technology has set clear product quality targets and, through regular reviews of completion status, remains continuously committed to the strict control and ongoing optimization of its quality targets.

2025 Targets

0 product quality accidents — **Achieved**

2025 Target Achievement

Product quality accidents in all bases were **0**

2025 Targets

Customer satisfaction rate shall be no lower than 90 points — **Achieved**

2025 Target Achievement

Annual average customer satisfaction score among core customers was **94.89**

The response rate for the customer satisfaction survey reached **100%**

Quality Performance Evaluation

GCL Technology incorporates quality metrics into the monthly and annual performance assessment system of each business unit. By linking performance results with remuneration incentives, the Group has designed differentiated incentive pathways for frontline employees, middle- and senior-level managers, and departments as a whole, inspiring all employees to take greater initiative and responsibility in quality improvement and to promote awareness of product and service quality throughout every link of daily work.

Quality Inspection

In 2025, GCL Technology systematically reviewed and optimized the full lifecycle internal audits processes. Focusing on the six core processes centered on "customer orientation", the Group completed a comprehensive review and upgrade of the entire chain of processes from contract review to after-sales service, standardized process standards, streamlined documentation procedures, strengthened change control, and established a differentiated management mechanism for customer requirements, thereby continuously advancing the internal audit system toward greater refinement and a closed-loop approach. At the same time, it actively accepted quality inspections by third-party organizations from customers and third-party agencies. In 2025, GCL Technology conducted a total of 30 internal quality audits and accepted 28 quality inspections by third-party organizations.

GCL Technology Conducts External Quality Inspections and Special Activities

In 2025, GCL Technology continued to consolidate the results of quality management through systematic external quality inspections and special activities. **Throughout the year, it carried out 17 special quality inspections and identified 283 issues through audits, with 100% rectification completed**.

From September to November, the Group launched the 100-Day Quality Campaign under the theme of "Write what you do, do what you write," focusing on strengthening internal capabilities in document formulation and implementation. It also paid close attention to customer complaint and feedback, and conducted retrospective analysis of historical issues. The campaign covered 9 bases, driving rectification of 179 issues related to documents and execution, and completing review-based improvement for 12 historical quality anomalies.

In terms of external audit, all bases underwent 28 second- and third-party audits during the year and passed all of them successfully. At the same time, the Group conducted quality audits of multiple upstream suppliers, driving improvements in their production, storage, and change management. On-site audits by downstream clients were all passed, and all bases completed rectification of non-conformities and suggestion items identified through customer feedback in a timely manner and obtained confirmation, effectively enhancing supply chain synergy and customer trust.

To systematically respond to quality anomalies and emergencies, the Group established the *Specification for Handling Major Quality Abnormalities* at all bases, creating a closed-loop emergency mechanism covering early warning, response, handling, and improvement.

Improve System and Process Standards

In accordance with the *Regulations on Quality Accident Management* and the *Emergency Handling and Authorization Management System for Abnormal Operating Conditions*, among others, the Group clarified the responsibilities of emergency organizations and graded response procedures, and reinforced the handling principle of "prevention first and rapid coordination." By continuously optimizing process standards and SOPs, the Group strengthened monitoring mechanisms for key processes, controlling the occurrence and spread of anomalies at the source.

Conducted Targeted Investigations and Process Improvements

The Group organized comprehensive investigations into key factors such as metallic hazards, equipment conditions, and raw material consistency, and promoted the implementation of corresponding process improvements and control measures. Through case reviews and cross-departmental synergy, it developed targeted anomaly handling plans and enhanced on-site emergency response capabilities.

Strengthen Inspection Control and Data Traceability

The Group promoted error-proofing improvements in the inspection processes and upgrades to data monitoring functions, and improved the full-chain quality traceability system from raw material inbound to finished product outbound. It established an abnormal data tracking mechanism, enabling rapid dentification and closed-loop correction of quality issues.

Advance Systematic Prevention and Capacity Building

The Group converted experience accumulated in emergency response into standardized control requirements and strengthened quality risk awareness among all employees through training sessions, awareness campaigns, and case-based learning, continuously improving the quality and safety management mechanism of "pre-incident prevention, in-process control, and post-incident improvement."

As of December 2025

GCL Technology has made rapid progress in controlling metallic impurities in granular silicon:

98.0%

of products contain ⩽ 0.5ppbw of 5 key metallic elements

97.8%

Of products contain ⩽ 1 ppbw of 18 metallic elements

Stricter turbidity standards have also been implemented:

91.0%

Of products have turbidity of ⩽ 70 NTU

98.8%

Of products have turbidity of ⩽ 100 NTU

Quality Training

GCL Technology systematically advances the development of quality culture through a progressive path of "establishing norms, shaping behaviors, and shaping culture". By building a training system that improves employees' capabilities to ensure product quality that covers all employees, the Group continues to conduct culture promotion and awareness cultivation, driving quality principles to become truly embedded in organizational behavior and integrated throughout daily operations.

In 2025

the Group systematically organized

3,169

quality-themed training sessions centered on improving quality capabilities,

reaching

22,886 participants

covering employees across all quality management functions

Highlights of GCL Technology's 2025 Quality Training Programs

Full-Chain training coverage for the wafer segment

Using an integrated online and offline model, we conducted **73** specialized quality training sessions throughout the year, including "Training on the Application of the Seven QC Tools" and the "Training on Key Points for Operating Inspection Equipment," covering **2,994 participants**.

Specialized safety training for major construction projects

In view of the characteristics of the 2025 construction and production ramp-up transition stage of Funing GCL's 20 GW annual monocrystalline silicon wafer project, the base focused on construction safety and production coordination and systematically pursued **31** specialized training sessions on topics including fire safety, high-risk operations, and environmental safety, covering **580 participants** and achieving coverage of **100%**, thereby strongly supporting the project's smooth commencement of operations.

Company-wide safety culture foundation program

General training sessions on topics such as "Safety Operating Procedures", "Work Safety Post Responsibilities" and "Fundamentals of Risk and Emergency Response" were conducted for all employees to strengthen awareness of safety responsibilities for each position, while a closed-loop system of specialized pre-job and on-the-job training sessions was established for new employees and employees transferring to new positions, with cumulative participation reaching **11,592**.

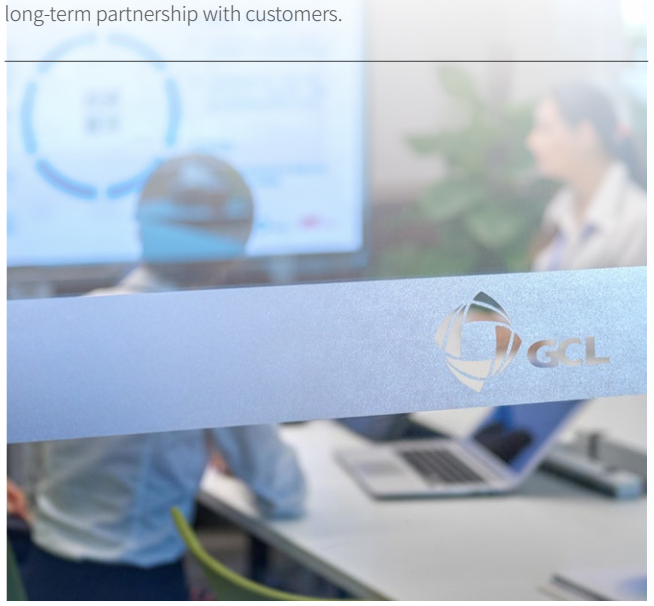
Deepening capability development for critical positions

For personnel in specialized positions involving high-risk operations, equipment operation, and safety management, the Group conducted customized, progressive training and conducted quarterly and annual comprehensive drills focused on emergency response, thereby systematically enhancing risk control and on-site response capabilities.

GCL Technology Conducts the "Quality Month" Special Campaign

In 2025, GCL Technology systematically conducted the "Quality Month" special campaign around key focus areas including"implementation of quality system documents, review of historical issues, and traceability of major anomalies". Through on-site inspections, a total of 179 optimization items of various types were identified and advanced for improvement. The Group also emphasized incorporating best practices from all bases into standard procedures, creating unified and optimized standards and preventing quality issues at the source.

The campaign systematically re-examined closed quality issues and, through online reviews and cross-unit synergized collaboration, organized professionals to conduct in-depth analysis of 27 quality reports, thereby strengthening the accumulation of experience. At the same time, 12 quality anomalies that had occurred in the past two years were reviewed intensively to clarify improvement directions, with a focus on advancing standard unification, document optimization, and stronger execution, gradually building a closed loop of quality management covering the full chain of "prevention, resolution, learning." Through this "Quality Month" special campaign, at the product end, the Company internalized quality, environmental protection, and social responsibility into management and processes to create reliable products. On the customer side, through a proactive and collaborative service model, it established deep trust and long-term partnership with customers.



Serving Customers

GCL Technology upholds a customer-centric approach, has established systematic customer management systems and response mechanisms, and continuously optimizes the experience of internal and external customers through innovation service models. The Group has developed a complete closed loop from demand collection and cross-departmental collaboration to issue resolution and improvement, and has promoted standardized and regulated operations across the full lifecycle, with the customer satisfaction rate and market recognition continuing to improve.

Information Collection

- **Customer communication mechanism**

Based on the product sales stages, communication plans are formulated for the product counseling stages, pre-sales stages, transaction, and after-sales stages. The regular meetings with customers were held every two weeks, and the visits to our customers were conducted on a regular basis to gain an in-depth understanding of customers' needs and respond to their requests in a timely manner.

- **Customer Feedback Channels**

Diversified feedback channels, including email, phone, and WeChat, have been established to ensure that customers can conveniently report product-related issues to the customer service team.

- **Customer satisfaction survey**

Major customers are surveyed across four dimensions: quality, price, delivery, and service.

Internal Management

- **Regular meetings on customer complaints**

Regular meetings on customer complaints are held weekly to conduct timely reviews and summaries and track the progress of the implementation of the improvement plans.

Targeted Improvement

- **Closed-loop handling of customer feedback/complaints**

In accordance with customers' needs, on-site personnel are arranged to stay at the plant and follow up on the production line throughout the process, with real-time monitoring of production launch risks; before shipment, complete original data are proactively provided for customer audit and confirmation, and shipment may be arranged only after approval; if anomalies arise during production processes, progress will be communicated to customers at the earliest opportunity and handled through synergized follow-up to ensure that issues are effectively resolved in a closed loop.

In 2025, by revising the *System for Managing Differentiated Customer Requirements*, GCL Technology systematically standardized the mechanism for communicating and implementing customers' needs, and established a cross-departmental collaborative support system throughout the full lifecycle of service. During the pre-sales stages, the Group organized joint reviews of customer requirements by multiple departments, provided on-site process monitoring and production launch monitoring services, and strictly implemented the process for customer confirmation of data prior to shipment. During the after-sales stages, batch closing was handled in accordance with agreed arrangements, and in the event of anomalies, the Group promptly provided customers with dedicated analyses and improvement measures, thereby forming a closed-loop quality management system from front-end prevention to back-end response.

Meanwhile, GCL technology conducted the handling of customer complaints in accordance with the *Response System of Customer Complaints and Returns of Products*, clarified the response time limit for each stage, and ensured that progress and results were fed back to customers within the prescribed time frame. By optimizing the complaint response mechanism, the Group achieved the provision of a resolution plan within an average of one working day, with a complaint resolution rate of 100%, effectively improving the customer satisfaction rate. In 2025, GCL Technology recorded 0 as the number of customer complaints, achieved an average customer satisfaction score of 94.89 among core customers, and attained a response rate of 100% for the customer satisfaction survey.

In terms of responsible marketing, GCL Technology puts into practice strict compliance with the *Advertising Law of the People's Republic of China* and the Group's internal *Responsible Marketing and Consumer Protection Policy*, and other policies, among other requirements, and systematically implements marketing compliance requirements. The Group conducts strict audit of the content of advertisements for promotion, manages the dissemination of on-line information in accordance with the standardized process, and carries out special inspections on sales, while continuously refining detailed clauses to ensure that its operating activities fully comply with regulatory requirements. Meanwhile, it remains customer-centered and communicates key information to customers in a clear and complete manner, including product performance, features, prices, and potential risks of use, and is committed to establishing a transparent and trustworthy market engagement mechanism.

GCL Technology 2025 Customer Services Data

2025

Complaint resolution rate	Annual average customer satisfaction score
100%	94.89
Customer satisfaction survey response rate	
100%	
Responsible marketing training	Participants in responsible marketing training
30 hours	53 persons

Digital Empowerment

GCL Technology deeply integrates digitalization and intelligent transformation into its development path, using technology to drive operational innovation and efficiency improvement. We rely on sustained technological innovation and digital empowerment to continuously strengthen our core competitiveness and provide strong support for the cultivation of new-quality productivity.

Digital Empowerment

In the process of building a green smart manufacturing system with low carbon emissions, GCL Technology has deployed a "5G + Industrial Brain" intelligent ecosystem network across multiple production bases nationwide, achieving intelligent control over production processes and refined operations, enhancing production efficiency and product quality, and laying a solid foundation for digitalization.

GCL Technology Key Data

Number of National High-Tech Enterprises
11

Number of National 5G Factory
1

Number of National Green Factory
4

Number of Industrial Internet Benchmark Enterprise
1

Honors of GCL Technology in 2025

Recognized as a National Green Factory
Leshan GCL, Jiangsu Zhongneng, Xuzhou Photovoltaic, Funing GCL
Ministry of Information Technology of China

Recognized as a 2025 5G Factory
Inner Mongolia Xinhuan
General Office of the Ministry of Industry and Information Technology

Recognized as a Jiangsu Province Advanced-Level Smart Factory
Xuzhou Photovoltaic
Industry and Information Technology Department of Jiangsu

Recognized as an "Autonomous Region Digital Workshop"
Ningxia Photovoltaic
Ningxia Department of Industry and Information Technology

Received "ESG AA certification"
Inner Mongolia Xinyuan
TÜV Rheinland Group

Highlights of GCL Technology in Smart Manufacturing

Project Name	Project Content	Project Achievement
Polysilicon DCS Alarms and Interlocks	A DCS analysis model is used to classify and grade alarms, improve the accuracy of alarm data, reduce false alarms, and enhance response timeliness.	• Employee alarm response timeliness increased from 50% to **95%** • The number of monthly alarm occurrences decreased by approximately **59%** • The incidence of missed, incorrect, and false interlock activations fell to below **1%**
Silicon Powder Quality and Supply-production Forecasting Model	A data model was established to identify the underlying patterns of impurities and production volume between raw materials and finished products, strengthen standards for supply-production analysis and quality inspection analysis, and reduce reliance on personnel.	• Based on production volume and maximum impurity elements, the system rapidly recommends silicon block ratios, addressing the challenge of manually determining silicon block ratios and improving batching efficiency by more than **10 times**.
Wafer Slicing Knowledge Graph Fault Repair	A knowledge base for knowledge graph-based fault repair was established. After maintenance personnel enter the equipment model and fault symptoms, the system automatically recommends the most suitable solutions and operating steps, accelerating repair progress.	• The time required for new engineers to handle complex faults was reduced from 2 hours to **45 minutes**. • Downtime losses decreased by **40%**.
Intelligent Batching and Material Picking	A batching model was established to rapidly and accurately recommend material batches based on indicator requirements, suppliers, inventory age priority, and other conditions.	• Material cost optimized by **1%** • Batching and material picking speed increased by **95%**

GCL Technology actively advances its AI strategy

With the targets of efficiency enhancement, risk control, and experience optimization, GCL Technology has deeply integrated AI into the entire business value chain, thereby advancing sustainable high-quality development.

Intelligent Manufacturing

Through DCS intelligent grading and digital twins, it achieved a 95% alarm response rate and a tenfold increase in core batching efficiency, completing a paradigm shift from experience-based dependence to a data-driven model.

Operations & Maintenance

Leveraging a crystal slicing knowledge graph built on DeepSeek, it significantly reduced the average fault-handling time from 2 hours to 45 minutes and reduced downtime losses by 40%, effectively empowering frontline engineers.

R&D and Operations

Following the introduction of large models such as Qwen 2.5, platform development efficiency increased by 70%, testing workload decreased by 80%, and intelligent reuse of brand assets was achieved.

AI has thus become the cornerstone for GCL Technology to build differentiated competitiveness.

Inner Mongolia Xinhuan Pilot Project to Develop an AI Intelligent Assistant

To enhance the professionalism, standardization, and real-time support capabilities of production operations, Inner Mongolia Xinhuan actively explored the practical application of artificial intelligence on the front line of production, selected the hydrochlorination section for a pilot project, and successfully developed and deployed an AI process operator (intelligent assistant) named "Xinhuan Xiaoqing." Deeply integrating equipment expertise with safety procedures, this intelligent assistant can provide employees at any time with professional operational guidance and technical document interpretation covering the full lifecycle of start-up, operation, and shutdown, serving like an "online hydrochlorination expert". Its application has effectively improved the level of operational standardization and work safety, while substantially shortening the response time for obtaining professional support and providing immediate, authoritative intelligent assistance to the front line of production.

Digitalization Transformation Measures

Driven by the upgrade of the system tree platform, GCL Technology has built a risk control system through a digital transformation system, continuously optimized the effectiveness of procedure management, and further promoted improvements in resource allocation and business process efficiency.

Procedure Review and Special Governance	• Conducted a comprehensive review of procedures already published online, issued the semiannual report on policy framework development and System Tree Platform management, carried out detailed analysis around key metrics such as the procedure launching rate, and circulated categorized reports on management achievements by management hierarchy and business module. • Conducted special reviews of procedures for key modules such as engineering, procurement materials, and human resources, abolished redundant content, promoted the closed-loop revision of issues in procedure design, and enabled proactive risk control.
System Development and Integration Optimization	• Completed the phase II development and launching of the System Tree Platform, creating seamless integration with the safety document management system and ensuring the security of encrypted procedure documents during circulation; • Further deepened the integration between the System Tree Platform and the process review center, implemented automated reviews for procedure issuance, streamlined data entry links, and significantly improved issuance efficiency.
Communication, Promotion and Implementation of Training Sessions	• Carried out special promotion activities around the first anniversary of the platform's launching and, for all employees at the Management Center and each bases, organized rolling training sessions on core functions to solidly advance the annual procedure management work.

Jiangsu Zhongneng Builds a Digitalization Platform Covering the Entire Manufacturing Value Chain

By integrating intelligent packaging, automated transfer, and a digital management platform, Jiangsu Zhongneng established a traceability system with end-to-end data connectivity across the full lifecycle, creating closed-loop management and real-time dispatch from production to delivery, significantly improving operational efficiency and reducing overall costs. At the same time, the Company applied AI-powered intelligent inspection technology to carry out full-coverage real-time monitoring of 692 key pieces of equipment. Through precise identification of anomalies in data and preventive maintenance, it successfully resolved 492 issues during the year and avoided 4 instances of unplanned downtime, greatly enhancing equipment reliability and operational safety. This efficient, intelligent, and green practices-oriented manufacturing model has helped the Company secure long-term strategic cooperation with numerous top-tier enterprises and continuously consolidate its industry core competitiveness.

Industry Collaboration

GCL Technology has established in-depth cooperative relationships with more than 20 universities, including East China University of Science and Technology, Xi'an Jiaotong University, and Central South University, as well as research institutions such as Suzhou National Laboratory, Gusu Laboratory, and the Suzhou Institute of Nano-Tech and Nano-Bionics of the Chinese Academy of Sciences. In 2025, GCL Technology, together with universities, research institutes, and external enterprises, jointly completed three technical pathways for the repair/recycling of lithium battery cathode materials and four technical pathways for porous carbon, and advanced five collaborations with an AI materials R&D company in silicon catalyst, lithium catalyst and carbon catalyst development, and process optimization.

Highlights of GCL Technology's Exchange and Cooperation in 2025

Centered on the "Tech GCL" strategy, GCL technology intensively advanced industry-academia-research collaborations, with a focus on cutting-edge fields of energy materials such as silicon, lithium, and carbon, and jointly built physical R&D platforms with a number of top-tier research institutes:

GCL Optoelectronics, a subsidiary of the Group, entered into an in-depth partnership with Suzhou National Laboratory. Together with Suzhou University, the parties jointly established a research and development center and Jiangsu Province Key Laboratory of Advanced Negative-Carbon Technology. The lithium battery project cooperated with Sichuan University to jointly establish a provincial-level technology center, opening a new chapter in "industry-academia-research-application" cooperation.

02

Green Infinity

Environmental Management | Pollution Prevention and Control | Resource Utilization | Climate Change

SDG Goals Addressed in This Chapter

Green is not only a distinctive feature of GCL Technology's products, but also the defining color of its daily operations. The Group has continuously enhanced its environmental management system, promoted efficient resource recycling, strengthened pollution prevention and control to ensure compliance with emission standards, and actively responded to the challenges of climate change. Through lean management, it safeguards the purity of nature and envisions a zero-carbon future with Green Infinity.

G R E E N I N F I N I T Y

Environmental Management

GCL Technology strictly complies with the *Environmental Protection Law of the People's Republic of China*, the *Circular Economy Promotion Law of the People's Republic of China*, and other relevant laws and regulations, and fully fulfills its primary environmental responsibilities. The Group formulates annual environmental management targets and, through systematic advancement, full-process monitoring, and closed-loop rectification, ensures that all targets are effectively implemented. In 2025, all environmental management targets were achieved, and environmental governance continued to improve.

2025 Targets

0 environmental emergencies

Achieved

2025 Targets

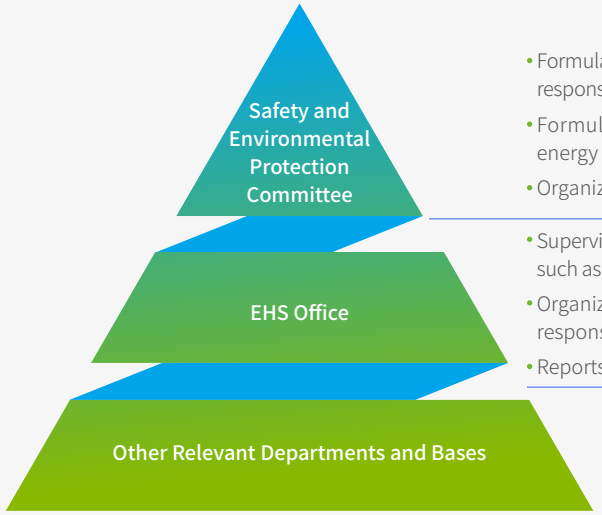
0 environmental incidents arising from hazardous chemical leaks

Achieved

Governance Structure

The Group has established a sound environmental management structure, with the EHS Management Committee serving as the highest management body and led by Executive Director and Joint CEO Lan Tianshi, who provides overall coordination and advancement of safety and environmental protection work. The EHS Management Committee formulates and regularly reviews the Group's policies and objectives for safe and environmentally responsible production, coordinates the implementation of environmental protection measures, and continuously enhances the effectiveness of environmental management.

GCL Technology's Organizational Structure of Environmental Management



- Formulate and review the Group's policies and objectives for safe and environmentally responsible production, and supervise their implementation
- Formulate and supervise strategies related to environmental resources such as energy and water usage
- Organize major potential hazards assessments and supervise rectification
- Supervise and assess the environmental management practices of various subsidiaries, such as energy and water management strategy, targets and performance
- Organize and implement comprehensive inspections on safe and environmentally responsible production
- Reports to the Committee on a regular basis
- Formulate management systems and annual work plans, and implement day-to-day management work
- Develop environmental pollution emergency response plans, and organize relevant training sessions and drills

Environmental Management System

GCL Technology formulated and publicly issued the *Environmental Protection Management Policy*, and revised the *Environmental Monitoring Management System*, the *Solid Waste Management Control Procedure*, and other documents to further improve the environmental management system, clarify the environmental protection responsibilities of each department, standardize management processes, and promote the standardization and normalization of environmental management.

Performance Management

GCL Technology incorporates environmental management performance into its performance evaluation system, clearly sets environmental protection targets such as energy savings and consumption reduction, and, by signing the *Annual Business Objectives Responsibility Agreement* with the heads of all bases, directly links assessment results to the remuneration incentives of the core management, thereby effectively ensuring the implementation of all environmental protection targets.

Environmental Audit

GCL Technology has consistently upheld the core principle of environmental sustainability, conducts comprehensive environmental audits at all operating bases annually, and systematically advances the internal and external audit mechanism for its environmental management system. The Group commits that all operations will undergo one internal environmental audit and one external audit conducted by an independent third-party with nationally recognized qualifications annually, thereby ensuring the continued compliance and effective operation of environmental management.

In 2025, GCL Technology conducted 12 internal environmental audits and underwent 12 external audits, creating 100% full coverage across all geographic regions and operational links. The audit scope covered key areas including environmental governance performance, energy use efficiency, hazardous waste management, and pollutant emissions control, comprehensively evaluating the current status of environmental management at all production bases. Environmental audits adopted scientific sampling methods and systematically collected objective evidence through a combination of interviews, document review (including procedures documents, operating records, and ledger reports), on-site observation, and verification, forming comprehensive evaluation conclusions. In response to issues identified, the audit team put forward targeted rectification recommendations, promoting closed-loop management and continuous improvement.

At the same time, all production bases of the Group organize internal environmental audits every year, with a focus on verifying legal compliance and alignment with the ISO 14001 Environmental Management System. For issues identified during auditing, a closed-loop management system is established to ensure timely rectification and the ongoing optimization of management.

The 2025 auditing results show that GCL Technology has established an environmental management system that complies with the requirements of the *GB/T 24001-2016* standard, clarified the environmental management responsibilities of each department, and formulated and improved relevant procedural documents and operating specifications. During the year, the identification of environmental factors across all processes was completed, with more than 500 environmental factors identified, including over 100 significant environmental factors. Corresponding control measures and management plans were developed for each significant environmental factor, effectively enhancing capabilities in environmental risk prevention and control.

In 2025

12
Internal environmental audits

12
External environmental audits

100%
full coverage across all geographic regions and operational links

more than 500
environmental factors identified

System Certifications

GCL Technology's 12 production bases that are in stable operation and qualified for certification passed the audit for compliance with the ISO 14001 Environmental Management System requirements and obtained the corresponding certificates, with coverage reaching 100%. Through the systematic establishment of environmental management systems, the environmental performance of the group's production bases continued to improve. In 2025, Leshan GCL was recognized as a National Green Factory, Jiangsu Zhongneng, Xuzhou Photovoltaic, and Funing GCL continued to hold the title of National Green Factory. Among them, Jiangsu Zhongneng outperformed national standards in pollutant emissions concentration, achieved a comprehensive utilization rate of 99% for industrial solid waste, and a reuse rate of over 98% for industrial water, making it an industry benchmark in environmental management.

GCL Technology

Number of production bases that are in stable operation and qualified for certification

12

The coverage rate of ISO 14001 Environmental Management System certification reached

100%

The comprehensive utilization rate of industrial solid waste at Jiangsu Zhongneng reached

99%

The industrial water reuse rate reached over

98%

Environmental Protection Training

GCL Technology has established the *Regulations on Environmental Protection Training Management* and regularly conducts environmental protection training sessions at different levels, covering key links including environmental protection regulations, solid waste management, pollution control, emergency response, and hazard identification. All bases hold themed promotional activities on World Environment Day each year to continuously enhance employees' environmental awareness. During the reporting period, total attendance in environmental protection training by GCL Technology employees exceeded 46,700 participants, and the total duration of training surpassed 41,800 hours.

Jiangsu Zhongneng Focuses on World Environment Day to Empower Green Sustainable Development

On June 5, 2025, Jiangsu Zhongneng closely followed the theme of World Environment Day and systematically conducted specialized environmental protection training sessions covering key areas such as environmental emergency response management, solid waste management, radiation safety management, cleaner production and auditing, and environmental laws and regulations. The training sessions recorded over 1,200 participants with a total of 48 training hours, and effectively enhanced employees' environmental awareness and professional skills. Through systematic training sessions, employees gained a comprehensive grasp of the core requirements for the classification and identification, compliant transfer, and safe storage of solid waste, further strengthened their understanding of the full-lifecycle management of radiation sources, and clarified key risk prevention and control measures during use. They also gained in-depth knowledge of cleaner production guidelines and relevant policies and regulations, effectively improving the standardization and practical competence of environmental management.

To enhance emergency response capabilities, in October 2025, Jiangsu Zhongneng, together with the Xuzhou Municipal Ecology and Environment Bureau, organized and conducted a radiation accident emergency drill. A total of 17 government institutions participated, with 60 participants involved in the drill, while 25 radiation-related enterprises attended as observing units, with more than 153 observers, further reinforcing the environmental safety defense line.

Jiangsu Zhongneng World Environment Day Training Site

Jiangsu Zhongneng and Xuzhou City Radiation Accident Emergency Drill Site

Environmental Risk Management

GCL Technology adheres to the core guidelines of "control at the source, stringent process management, compliance at the end stage, and full-process traceability," and promotes all tasks in an orderly manner by phase and by area, building an environmental management system featuring full-chain coverage and closed-loop management to ensure that all environmental protection targets are achieved on schedule and maintained over the long term. We focus on key links such as production process optimization, the selection of environmentally friendly raw materials, and the upgrading of production capacity structures, continuously reducing pollutant generation, effectively mitigating environmental risks, and comprehensively enhancing our sustainability capabilities.

In accordance with the *Measures for the Administration of Emergency Response Plans*, the *Measures for Environmental Emergency Response Management*, and the laws and regulations of its operating locations, GCL Technology has prepared the *Emergency Response Plan for Environmental Emergencies* and concurrently carried out environmental risk assessment, systematically identifying potential risk sources and environmentally sensitive sites and formulating targeted risk control and emergency response measures. We have established a full-chain environmental emergency response framework and systematically advanced key links including risk identification, monitoring and early warning, response, and recovery and reconstruction, clarified the classification standards and response mechanisms for emergencies, comprehensively enhanced our overall capability to respond to environmental emergencies, and ensured that swift, efficient, and orderly action can be taken in emergencies.

GCL Technology's Environmental Risk Management Procedure

Risk Identification	Identify the types of environmental risk substances, the characteristics of risk units, and environmental risk levels.
Monitoring and Early Warning	Focus on monitoring environmental risk sources, clarify monitoring methods, approaches, and measures, and formulate an early warning action plan.
Emergency Response Measures	In accordance with the classification standards for environmental emergencies, formulate corresponding emergency response measures to ensure that emergency response is carried out in a scientific and orderly manner.
Recovery	Address both recovery and reconstruction and post-incident handling, including on-site cleanup, restoration of production and daily life, as well as compensation and measures to eliminate the impact of the incident, while carrying out environmental impact assessments as appropriate.
Protective Measures	Approach implementation from multiple dimensions, including communication and information, human resources, emergency supplies and equipment, technology, financial resources, healthcare, transportation, public security, logistics, and legal affairs, while also comprehensively integrating social resources to ensure that protective measures in all respects are fully implemented and operate efficiently.
Supervision and Management	Establish a supervision and management mechanism, clarify the division of responsibilities, conduct regular inspections and dynamic monitoring, and ensure that environmental management practices are effectively implemented.

Ecological Protection

GCL Technology strictly complies with the *Wildlife Protection Law of the People's Republic of China*, the *Regulations of the People's Republic of China on Nature Reserves*, and ecological and environmental laws and regulations applicable in its operating locations, and has formulated the *Biodiversity Conservation Commitment and Policy*, making clear commitments in areas including natural resources protection, forest resource management, and the use of renewable energy. In addition, GCL Group officially became a signatory to the Taskforce on Nature-related Financial Disclosures (TNFD) in 2025, integrating biodiversity protection into its corporate strategy and risk management. The Group extends ecological protection requirements to supply chain management, requiring suppliers to jointly fulfill their ecological responsibilities, build an ecological protection system covering the entire value chain, and commit to systematically assessing and disclosing its business's dependencies and impacts on the natural ecology.

World Wide Fund for Nature (WWF) Membership Certificate

The Group has systematically reviewed the interactions among its operating bases, business processes, and the surrounding ecological environment, and conducted an in-depth analysis of the pathways and degree of its impacts on and dependence upon the natural ecology. The assessments show that, during the project construction phase, the Group's impacts on nature are greater than its dependence on ecosystem. The main impact factors include land use, emissions of non-GHG air pollutants, and noise disturbances. Based on this, the Group has developed targeted management requirements and protection measures, clearly stipulating that all projects under construction must strictly implement ecological protection plans and, through scientific planning, process control, ecological restoration, and other measures, minimize the negative impacts of project construction on the surrounding ecological environment, achieving synergy between economic development and ecological protection.

GCL Technology adheres to an ecology-first approach. During the pre-construction phase, it comprehensively assesses impacts on biodiversity, selects sites prudently, and avoids nature reserves and ecologically sensitive areas. During the construction phase, it strictly follows the *Management System for Influencing Relevant Parties*, the *Noise Pollution Prevention and Control Responsibility System*, the *Environmental Protection Management System During the Construction Period*, the *Wastewater Management During Construction*, the *Dust Prevention and Control During Construction*, the *Noise Prevention and Control During Construction*, and other procedures, clarifies environmental management requirements for each process, and ensures the green and orderly implementation of projects.

Ecological Protection Measures for Construction Projects

Air Pollution Control

For projects involving earthworks, crushed stone, and other activities that generate dust, construction teams are required to use mist cannons.

Soil and Water Conservation

Small-scale, targeted excavation methods are adopted for large-scale construction.

Soil quality and groundwater levels are monitored regularly, and the effectiveness of conservation efforts is assessed scientifically.

Noise Abatement

Monitoring stations are installed to conduct real-time noise tracking at construction sites.

For fans and blowers, soundproof covers and acoustic insulation are adopted.

Vehicle movement is strictly controlled and kept away from residential areas to minimize disturbance.

Ecological Conservation

Damage is reduced through transplanting and compensatory planting.

Measures are taken to prevent and reduce the impacts of construction on local wildlife habitats.

GCL Technology Takes Action for Plateau Ecological Protection

From September 20 to 22, 2025, the "2025 Himalayan Guardian Conference and the Second Beautiful Convention Pioneer Action" was grandly held in Nyingchi, Tibet, with GCL Technology participated actively throughout the event as a co-initiator. To further put its ESG strategy and sustainable development philosophy into practice, the Group integrated corporate social responsibility into concrete actions for plateau ecological protection through diverse forms such as organizing environmental protection practice activities, conducting themed sharing and exchanges, and participating in mountain clean-up hiking activities. During the event, GCL Technology engaged in in-depth discussions on sustainable development pathways with the Beautiful Convention organization and other participants, jointly contributing to the protection of the Himalayan ecological environment.

GCL Technology at the Himalayan Protection Site

Green Collaboration: From "Digital Tree Planting" to "Public Welfare Forest"

On the 10th anniversary of Ant Forest, GCL technology officially launched the "GCL Public Welfare Forest," integrating individual low-carbon behaviors into collective ecological action. As of March 11, 2026, GCL employees had cumulatively planted 28,910 virtual trees, representing an increase of 215% over 2024, with per capita tree planting reaching 39.5 times the national average. After the launch of the public welfare forest, it gained significant popularity, entering the platform's top three daily watering rankings on March 10. As of March 12, cumulative watering volume had exceeded 41 tonnes, enough to plant 2,466 Caragana shrubs. Through its online public welfare tree-planting campaign, we lowered the threshold for public participation in environmental protection and effectively connected its "dual carbon" (carbon peak and carbon neutrality) goals with everyday small actions.

GCL Public Welfare Forest Tops the Platform's Daily Watering Ranking

Pollution Prevention and Control

GCL Technology exercises stringent, end-to-end control over waste gas, wastewater, and solid waste generated at every link of its production operations, and has formulated and publicly issued the *GCL Technology Waste Gas Management System*, the *GCL Technology Wastewater Management System*, and the *GCL Technology Solid Waste Management System*, thereby establishing a full-lifecycle environmental management system covering key areas of environmental impacts. The Group continuously ensures a 100% concurrent operating rate between environmental treatment facilities and production equipment, a 100% compliance rate for waste gas, wastewater, and solid waste discharge, and that all emissions metrics consistently and stably meet or exceed national and local standards. On this basis, the Group has formulated and publicly issued medium-term pollution prevention and control targets covering all business operations, clarifying the emissions reduction pathway and timetable and continuously promoting improvements in environmental performance.

To further reduce water consumption across the value chain and manage environmental impacts in the supply chain, the Group also issued the *Initiative on Water Conservation, Energy Saving and Waste Reduction in the Supply Chain*, extending management requirements for water conservation, energy saving, and waste resource utilization to the supply chain level, guiding core suppliers to set quantifiable targets, implement classified waste management, and promote the use of biodegradable and recyclable materials.

GCL Technology's Targets and Progress for Waste Gas and Solid Waste in 2025

Waste Gas Targets

By 2030, annual nitrogen oxides (NO_x) emissions intensity will be below 3 kg/MW, annual sulfur oxides (SO_x) emissions intensity will be below 2.5 kg/MW, annual particulate matter (PM) emissions intensity will be below 1.5 kg/MW, annual volatile organic compound (VOC) emission intensity will be below 0.015 kg/MW, with the target covering all of the Group's operations.

Achieved

2025 Target Achievement

NO_x emission intensity **2.13 kg/MW of wafers**
SO_x emission intensity **1.73 kg/MW of wafers**
Particulate matter (PM) emission intensity **0.72 kg/MW of wafers**
VOC emission intensity **0.010 kg/MW of wafers**

Non-Hazardous Waste Target

By 2030, annual non-hazardous waste generation intensity will be below 1.00 tonne/MW, with the target covering all of the Group's operations.

Achieved

2025 Target Achievement

Non-hazardous waste generation intensity
0.71 tonnes/MW of wafers

Hazardous Waste Target

By 2030, annual hazardous waste generation intensity will be below 0.010 tonne/MW, with the target covering all of the Group's operations.

Achieved

2025 Target Achievement

Hazardous waste generation intensity
0.007 tonnes/MW of wafers

Waste Gas Management

GCL Technology strictly complies with the *Law of the People's Republic of China on the Prevention and Control of Atmospheric Pollution* and relevant laws and regulations. In accordance with updated national, provincial, and municipal laws and regulations as well as industry standards, the Group promptly revises relevant management systems and has established management systems including the *GCL Technology Waste Gas Management System*, the *Waste Gas Pollution Prevention and Control System*, the *Fugitive Emissions Prevention and Control Management System*, the *Regulations on the Control of Production Waste Gas Emissions*, the *Management System for the Shutdown, Startup and Dismantling of Environmental Protection Facilities*, and the *Environmental Monitoring Management System*, thereby forming a complete management closed loop. Among these, the *GCL Technology Waste Gas Management System* explicitly covers all departments and directly affiliated companies, and implements end-to-end management for process waste gas, combustion flue gas, dust particles, VOCs, and odorous gases, covering source reduction, classified collection, tail gas recovery and treatment, fugitive emissions management, facility operation, emergency response, and ESG disclosures, while also clarifying the responsibilities of departments including EHS, production, supply chain, and finance, thereby continuously enhancing the systematic nature and execution capability of air pollution control management.

The Group formulates and continuously optimizes waste gas emission monitoring plans in accordance with the requirements of pollutant discharge permits. Through synergized coordination between the Group's testing center and third-party agencies, routine monitoring and special testing are conducted for various waste gas emission outlets to track emissions data in real time, ensure the stable and compliant discharge of all pollutants up to standard, and effectively fulfill primary environmental responsibility.

Waste Gas Emission Reduction Measures

- During the operational stage, measures such as equipment technical upgrades and dust recovery technologies are adopted to reduce waste gas emissions.
- Waste gas emission monitoring plans are revised regularly in accordance with the provisions of pollutant discharge permits.
- Activated carbon used for waste gas adsorption is replaced regularly to ensure the continuous and effective operation of waste gas treatment facilities.
- Routine monitoring and special testing for waste gas are conducted through a combination of internal and external efforts, and all identified issues are fully rectified through a closed-loop process.

Leshan GCL Achieves Efficient Chlorosilane Recovery Through Deep Cooling

In 2025, Leshan GCL implemented a technology transformation project for tail gas deep-cooling recovery, adding a deep-cooling system after the original preliminary condensation process and maximizing the recovery of chlorosilane components in tail gas through low-temperature deep-condensation technology. Following the transformation, the chlorosilane recovery rate increased significantly, achieving resource utilization of valuable materials in waste gas and reducing emissions of volatile substances.

Wastewater Management

GCL Technology strictly complies with the *Water Pollution Prevention and Control Law of the People's Republic of China*, the *Regulations on Urban Drainage and Sewage Treatment*, and other laws and regulations, has established and continuously improved its *Wastewater Pollution Prevention and Control Management System*, and has formulated institutional documents such as the *GCL Technology Wastewater Management System*, the *Wastewater Pollution Prevention and Control Management System*, the *Emergency Pool Management System*, and the *Wastewater Discharge Permit Management System*. These procedures specify key indicators such as the frequency of wastewater monitoring, testing methods, and discharge limits; standardize operation procedures and approval authority for the shutdown, startup, and dismantling of wastewater treatment facilities; ensure that wastewater discharges fully comply with national and local standards and requirements; and eliminate at the source environmental risks arising from anomalous facility operation. The *GCL Technology Wastewater Management System* applies to industrial wastewater, domestic sewage, and initial rainwater generated during production and operations by all departments and directly affiliated companies, covering the entire process of collection, pretreatment, discharge, reuse, and emergency response management. This system strictly implements the principles of separating clean water from wastewater, separating rainwater from wastewater, and separating different wastewater streams, and strengthens whole-process management of the environmental impacts of wastewater through graded control, approval for non-routine pollutant discharge, supervision of facility operations, and data disclosure.

The Group has established a tiered and categorized responsibility management system, clearly defining the responsibilities of each department and each level in wastewater management and implementing whole-process wastewater control. Through a standardized operation and maintenance mechanism, the Group ensures that wastewater treatment facilities operate stably within their designed operating parameters and that treatment performance continuously meets applicable standards. At the same time, the Group has established a regular wastewater accident prevention mechanism and, through real-time monitoring and regular hazard identification, achieves effective control of wastewater leakage risks. In the event of emergencies such as wastewater leakage, emergency response plans are activated immediately to enable rapid response and handling, prevent the spread of pollution to the greatest extent possible, and effectively safeguard environmental safety.

The Group's wastewater arises from links such as granular silane gas purification, slurry treatment, and the nano-silicon circulating water system. We treat all wastewater in accordance with the principles of "separating wastewater from non-wastewater, treating wastewater by category, and reusing wastewater while discharging non-wastewater." By continuously optimizing production processes and upgrading wastewater treatment equipment, we continuously improve the rate of wastewater reuse and reduce wastewater discharge at the source. In 2025, all bases strengthened dynamic monitoring of wastewater pH value and turbidity to ensure the compliance rate of treatment, while also conducting multiple special wastewater inspections, including initial rainwater environmental management inspections and automated pollution source monitoring facilities inspections. Rectification was implemented for each issue identified, creating closed-loop management of issues.

During the reporting period, GCL Technology achieved stable and compliant wastewater discharge up to standard, and no wastewater discharge exceedance incidents occurred. Among them, Inner Mongolia Xinyuan achieved "zero discharge" of industrial wastewater.

Leshan GCL's Deep-Cooling Recovery System Reduces Saline Wastewater Discharge

In 2025, Leshan GCL optimized the treatment process for chlorosilane tail gas by adding a deep-cooling system at the front end of the alkali scrubber for in-depth material recovery, thereby reducing at the source the quantity of pollutants entering the alkali scrubbing stage. This measure substantially reduced alkali consumption, decreased wastewater discharge by 95 tonnes per month, and significantly reduced the generation of saline wastewater.

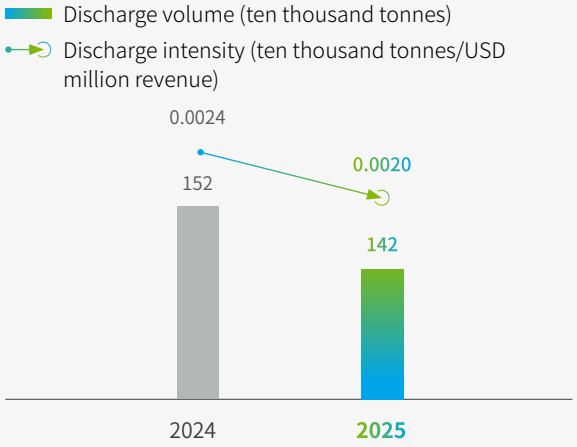
Xuzhou Photovoltaic Achieves Efficient Recycling of Cooling Water

In 2025, Xuzhou Photovoltaic systematically reviewed water-use indicators and consumption for production equipment. Through coordinated planning and optimized management, the cooling tower blowdown was repressurized by pumps and reused in other processes, achieving cascading water use. According to statistics, a cumulative total of 893,700 tonnes of water from cooling towers and concentrated water was recovered throughout the year, saving water withdrawal costs of RMB 840,000, effectively reducing fresh water withdrawal and decreasing clean wastewater discharge.

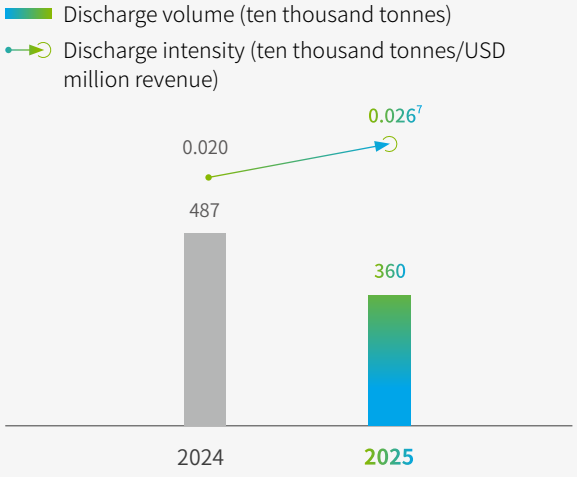
Inner Mongolia Xinhuan Advances a Water Reuse Project for the High-Boiling Slurry Section

In 2025, Inner Mongolia Xinhuan implemented upgrades for fit-for-purpose water use and wastewater reuse, changing the water used for lime slurry preparation to clarified wastewater and the water used for sodium sulfate preparation to evaporation condensate, thereby achieving resource utilization of wastewater. After the upgrades, 63,403 tonnes of production water were saved throughout the year, water resource costs were reduced by RMB 456,000, the comprehensive utilization rate of water resources was effectively improved, and wastewater disposal costs and environmental burdens were reduced.

GCL Technology's Wastewater Discharge for Polysilicon in 2024-2025



GCL Technology's Wastewater Discharge for Wafer in 2024-2025



[7] Due to the impact of market conditions, the company's silicon wafer capacity utilization rate declined in 2025, and the discharge intensity of wastewater showed an upward trend.

Waste Management

GCL Technology strictly complies with laws and regulations such as the *Law of the People's Republic of China on the Prevention and Control of Environmental Pollution by Solid Waste* and the *Standard for Pollution Control on Hazardous Waste Storage*, and has formulated institutional documents such as the *GCL Technology Solid Waste Management System*, the *Waste and Hazardous Waste Management Control Procedure*, the *Emergency Plan for Waste Leakage*, and the *Hazardous Waste Prevention and Control Responsibility System* to comprehensively strengthen the management of solid waste classification, storage, and disposal. Through the *GCL Technology Solid Waste Management System*, the Group has established a whole-process management system covering hazardous waste and general industrial solid waste, applicable to classification, collection, temporary storage, transfer, disposal, and resource utilization in the production and operation activities of various departments and directly affiliated companies. This system clearly requires source reduction, classified storage, compliant transfer, whole-process ledger and traceability management, and incorporates emergency response management, qualification audit, and ESG data disclosure into a unified framework to continuously reduce the environmental impacts arising from solid waste disposal. Leveraging the *Solid Waste Management Control Procedure*, the Group has achieved unified management of all categories of solid waste, including general industrial solid waste, hazardous waste, and waste chemicals, covering every link in the entire chain from generation to disposal. In 2025, the Group achieved 100% compliant disposal of solid waste and hazardous waste.

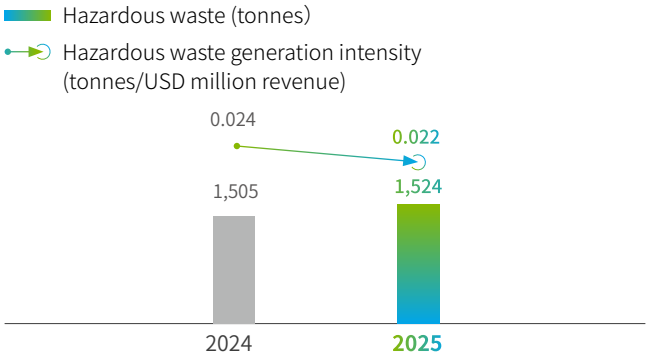
GCL Technology's Solid Waste Generation Management Measures

Hazardous Waste	Non-Hazardous Waste
• Conduct hazardous waste assessment, clarify classification standards, and establish dedicated management processes • Register hazardous waste and store it in the hazardous waste warehouse after generation, and declare its transfer in the hazardous waste management system • Ensure all hazardous waste is compliantly disposed of by qualified third-party service providers	• Strengthen systematic process control and operations, and reduce the generation of solid waste through process optimization • Standardize temporary stacking and storage standards for solid waste to avoid environmental pollution • Entrust qualified third-party agencies to carry out resource utilization and conduct regular inspections on non-hazardous waste disposal

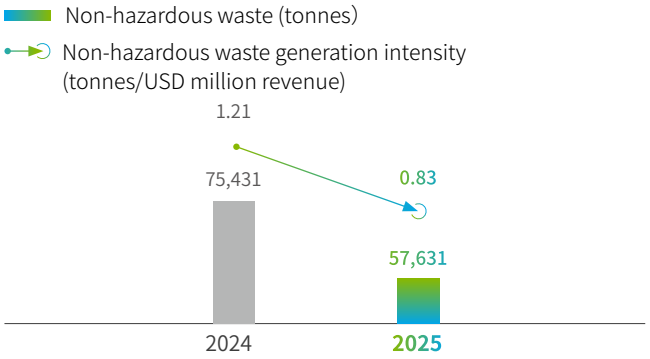
Xuzhou Solar Energy Material Advances Source Reduction and Resource Recovery of Waste

In 2025, through process optimization, the Xuzhou Solar Energy Material factory replaced developer with purified water in the finished product inspection process, reducing the annual generation of hazardous waste packaging barrels by approximately 1.15 tonnes. At the same time, for non-hazardous waste, Xuzhou Solar Energy Material implemented recycling and reuse of trench slurry generated in the slurry molding workshop, and after treatment resulted in the sales of 74.34 tonnes, promoting closed-loop resource management.

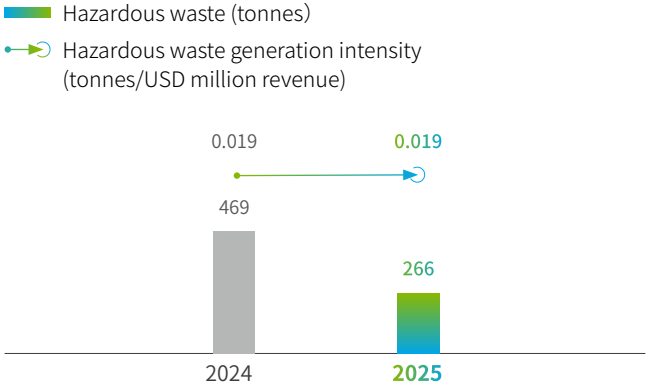
GCL Technology's Hazardous Waste Generation for Polysilicon in 2024-2025



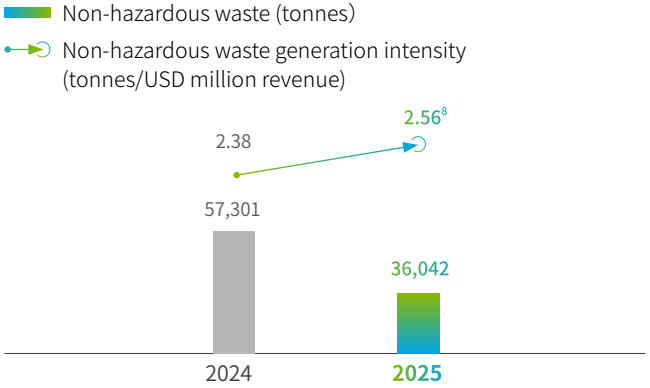
GCL Technology's Non-hazardous Waste Generation for Polysilicon in 2024-2025



GCL Technology's Hazardous Waste Generation for Wafer in 2024-2025



GCL Technology's Non-hazardous Waste Generation for Wafer in 2024-2025



[8] Due to the impact of market conditions, the Group silicon wafer capacity utilization rate declined in 2025, and the non-hazardous waste generation intensity showed an upward trend.

Resource Utilization

GCL Technology integrates the concept of resource conservation throughout the entire production and operational process, and has established and improved a policy framework for resource management, including the *Energy and Water Conservation Management Guidelines* and the *Energy Saving and Emission Reduction Work Plan*, to clarify the division of responsibilities for resource management at each level, covering key links such as the planning of water and energy targets, daily operational monitoring, and the assessment of performance indicators, thereby forming a systematic resource management mechanism.

Governance Structure

GCL Technology places great importance on energy and water resource management and has established and improved its organizational structure to fully ensure the scientific decision-making and efficient execution of management objectives. At the governance level, Executive Director and Joint CEO Lan Tianshi takes the lead in comprehensively directing the formulation of GCL Technology's strategies related to energy and water usage and overseeing their implementation. The ESG Committee is responsible for comprehensively overseeing the formulation and execution of energy and water usage targets. At the management level, the Sustainability Management Committee, under the leadership of the Joint CEO, is responsible for formulating and leading the implementation of these strategies across all bases. At the execution level, the Business Management Center is responsible for ensuring the effective implementation of these strategies across the Group's bases and departments, while monitoring KPIs and providing support. The organizational structure effectively ensures comprehensive synergies, precise implementation, and long-term control in the Group's energy and water resource management.

Performance Evaluations

Based on the patterns of water and energy consumption of each product, GCL Technology scientifically sets annual water- and energy-saving targets. By regularly assessing the implementation of water and energy-saving plans in specific work sections, and by signing the *Annual Business Objectives Responsibility Agreement* with the responsible individuals at each base, it clarifies accountability boundaries and assessment requirements to ensure the achievement of annual goals.

Water Resource Management

GCL Technology consistently integrates the sustainable management of water usage throughout the entire production and operational process, and formulates water-saving strategies tailored to local conditions based on dynamic water risk assessments at each production base. Through systematic measures such as improving production processes, deepening water recycling, expanding the use of reclaimed water and water reuse, and advancing water-saving technical transformation, it continuously enhances the efficiency of water utilization and effectively reduces reliance on natural water bodies. In 2025, the Group did not record any water-related non-compliance incidents.

Water Risk Management

Each year, GCL Technology uses the Water Risk Filter developed by the WWF to conduct systematic assessments of water resource conditions at all operations, including all operating bases and management center locations across the Group, covering the water risk characteristics of each operating base and formulating tiered and classified water resource management strategies based on the assessment results. In 2025, GCL Technology conducted comprehensive water risk assessment across all 14 operating locations (13 bases and 1 administrative management center), achieving 100% coverage. The assessment covered basin reputational risk[9], basin physical risk[10], and basin regulatory risk[11], continuously enhancing the Group's water governance capabilities.

In 2025

GCL Technology conducted comprehensive water risk assessment across all

14 operating bases

Coverage rate

100%

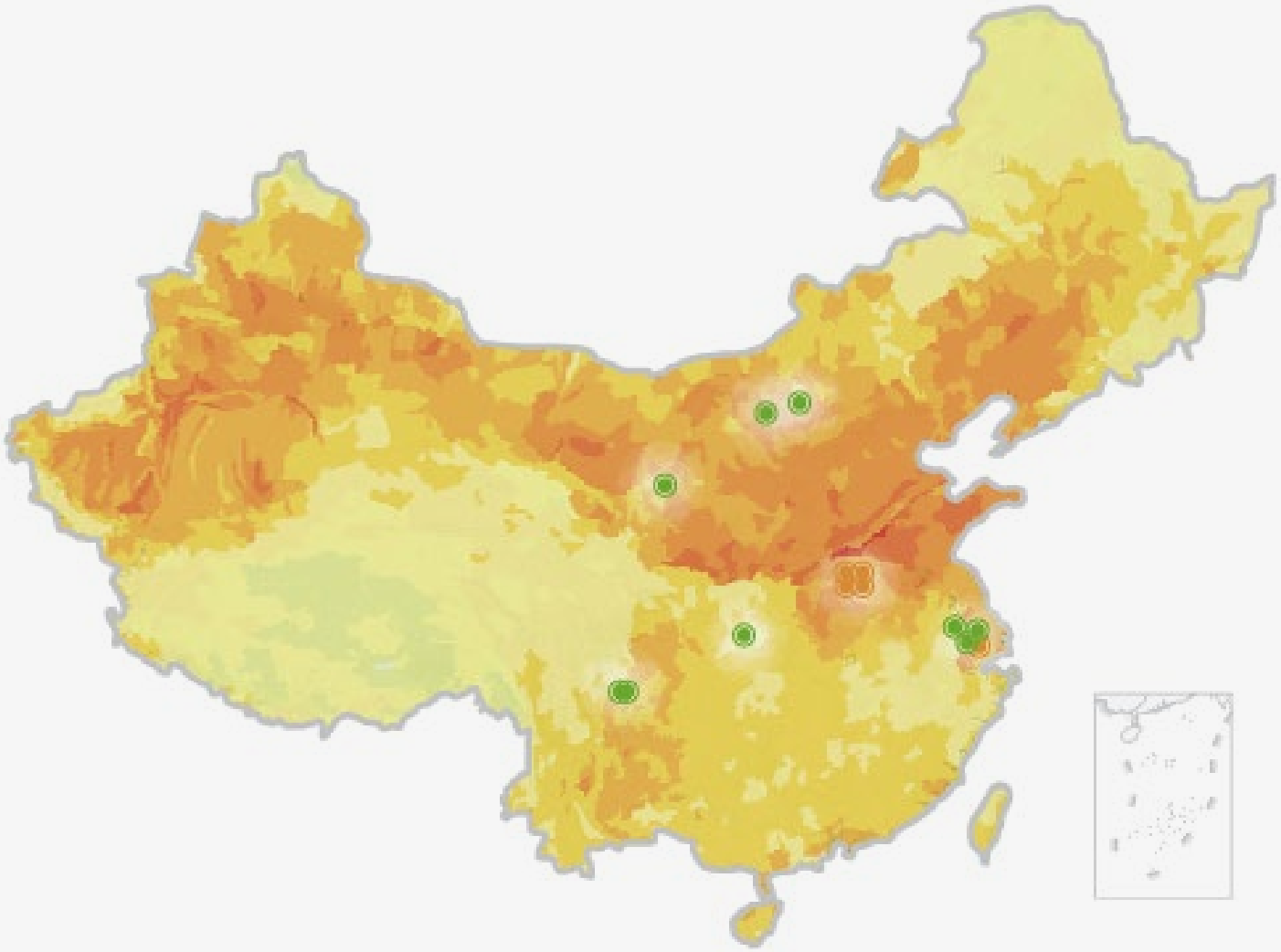
The assessment results show that GCL Technology's overall water risk score was 2.7, indicating a medium level of risk. The Group conducted risk assessments for each operating base individually and formulated differentiated and targeted water resource management strategies based on the water risk level of each base, effectively reducing water risk and advancing the sustainable use and efficient management of water usage.

[9] Watershed reputational risk: Potential risks arising from negative public opinion, mainly reflected in public perception of water, the intensity of local cultural significance, and media attention. Four key indicators are considered: the importance of water to local culture and biodiversity, media attention, and the risk of hydrological conflicts.

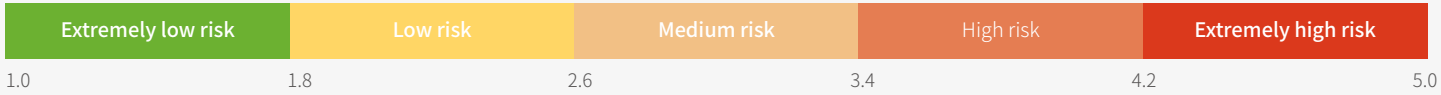
[10] Watershed physical risk: Risks to water quantity, water quality and aquatic ecosystems caused by human activities and natural factors. It includes four risk categories: water scarcity risk, flood risk, water quality risk, and ecosystem dependency.

[11] Watershed regulatory risk: Potential risks arising from government regulatory measures in water resource management, involving water rights allocation, wastewater discharge pricing mechanisms, water quality standard formulation and other aspects. It mainly includes four risk categories: uncertainty in the policy environment, insufficient institutional and governance effectiveness, defects in the application of management tools, and infrastructure and funding support risks.

GCL Technology's Basin Physical Risk Map



GCL Technology's average score of water risk 2.7 medium risk



Risk conditions at each operating base:

High risk	None
Medium risk	5 bases
Low risk	9 bases

Physical risk	3.2
Regulatory risk	1.7
Reputational risk	3.1

GCL Technology's Measures for Addressing Various Levels of Water Risks

Risk Type	Response Measures	Risk Level and Number of Bases[12]		
		High Risk (0)	Medium Risk (5)	Low Risk (9)
Reputational risk	**Disclosures:** Regularly assess water use efficiency and water resource management performance, and disclose wastewater discharge data and other relevant information to stakeholders to reduce reputational risk caused by information asymmetry	√	√	√
	Basin collaboration: Actively participate in basin protection projects and collaborate with local governments, communities, and NGOs to promote basin water resources protection	√	√	
	Emergency response plans: Formulate crisis response plans, clarify the response procedures when relevant crises occur, establish a public opinion monitoring system to track real-time media reports and public feedback	√		
Regulatory risk	**Compliant operations:** Strictly comply with national and local basin protection laws and regulations to ensure that all operational activities within the basin are legal and compliant	√	√	√
	External engagement: Maintain close communication and coordination with local government and environmental departments, and actively participate in basin-related government-enterprise exchanges	√		
Physical risk	**Sound management:** Establish a comprehensive water resource management system, clarify the roles and responsibilities at all levels, and formulate plans for water resource development and utilization	√	√	√
	Water conservation measures: Introduce advanced water treatment technologies, promote water conservation renovations, ensure compliant wastewater discharge, increase the reuse rate of wastewater and the proportion of alternative water sources used, and improve the efficiency of water utilization	√	√	√
	Plan formulation: Formulate scientific and reasonable water quota standards, and based on these standards, strictly assess the implementation of annual and monthly energy and water-saving plans to ensure that water-saving targets are effectively achieved	√	√	√
	Target planning: Formulate detailed water-saving and wastewater reduction targets, and incorporate water-saving targets into employees' performance appraisal	√	√	√

[12] The physical risk, regulatory risk, and reputational risk of each site are assessed as High, Medium, or Low. A site is classified as High Risk if two or more of the three risks are rated High; as Medium Risk if one risk is rated High; and as Low Risk in all other cases.

GCL Technology's Water Risk Management Measures Across Business Segments

Silicon powder

Equipment cooling

- Used boiler blowdown, rainwater, and cooling tower blowdown to replace fresh water and reduce freshwater consumption
- Used pressurized rainwater to replace fresh water, reducing the water refill demand for boiler cooling pool

Polysilicon

Raw material cleaning, Equipment cleaning

- Actively pursue efforts to optimize drainage systems, to achieve water recycling
- Installed and configured sewage disposal devices, successfully achieving the "Zero wastewater discharge" target
- Innovatively used the concentrate from the high-purity water unit in the PSE section as make-up water for 450 recycled water station, achieving resource utilization of wastewater

Wafer

Wafer cleaning, Cleaning and cooling wastewater

- Used treated reclaimed water as alternative water sources to reduce dependence on natural water resources
- Adopted process modifications and water-saving projects to reduce water usage
- Achieved partial wastewater reuse through system optimization and connected it to the landscaping irrigation pipeline network, effectively improving the rate of water recycling

Water Conservation

GCL Technology systematically reviewed the water usage and total volume across the production processes of each product and systematically assessed the water-saving potential of each scenario, to formulate science-based and systematic water conservation targets covering all bases. To achieve this goal, the Group established four major water-saving pathways for all operations including all products and tracks the water-saving performance of each pathway annually, including the development and utilization of unconventional water resources, water-saving upgrades to production processes and equipment, refined management of the water supply pipeline network, and water conservation renovations in non-production links. In addition, we implement quota management for daily production and domestic water use, and provide corresponding rewards based on actual water savings to encourage water-saving behavior and promote the efficient use of water resources. In 2025, the Group saved a total of 3,753,700 tonnes of water, a YoY increase of 166%.

GCL Technology's Water Conservation Targets and Progress for Polysilicon and Wafer in 2025

Water usage

Polysilicon[13] Targets

Using 2023 as the baseline year, reduce water consumption intensity by 31.78% by 2026, covering all polysilicon bases

2025 Target Achievement

Water consumption intensity of the polysilicon segment was **58.16 tonnes/tonne of polysilicon**, down by **20.89%** compared with the baseline year

Wafer[14] Targets

Using 2023 as the baseline year, reduce water consumption intensity by 9.31% by 2026, covering all silicon wafer bases

2025 Target Achievement

Water consumption intensity of the wafer segment was **337.19 tonnes/MW of wafers**, up by **73.32%**[15] compared with the baseline year

GCL Technology Water Resource Management Pathway and Achievements in 2025

Management and Control Pathways	Covered Product Categories	Examples of Specific Measures	Annual Achievements
Development and utilization of unconventional water resources	Silicon powder, Polysilicon, Wafers	• Inner Mongolia Xinyuan reduced fresh water consumption by collecting boiler blowdown and rainwater, creating annual water savings of **269,000 tonnes**. • Leshan GCL recovers concentrated water and returns it to the system for blending and dilution. Approximately **55 tonnes** of condensate water can be recovered during each equipment replacement, creating annual water savings of **9,900 tonnes**. • Inner Mongolia Xinhuan promoted water reuse projects, achieving circular water resource utilization and annual water savings of **2,160,000 tonnes**. • Xuzhou Photovoltaic expanded the use of recycled water and increased the volume of reused water. Reused water reached **900,300 tonnes**, accounting for **25.98%** of total water withdrawal, up from **21.35%** in 2024.	Annual water savings of **3,339,200 tonnes**
Water-saving upgrades to production processes and equipment	Polysilicon	• Jiangsu Zhongneng implemented equipment upgrades and renovations, replacing belt filter presses with plate-and-frame filter presses, creating annual water savings of approximately **255,000 tonnes**.	Annual water savings of **255,000 tonnes**
Refined management of the water supply pipeline network	Polysilicon	• Jiangsu Zhongneng conducted a comprehensive inspection of water pipelines across the plant and identified and addressed a total of 10 leakage points, promptly eliminating water waste and creating annual water savings of **150,000 tonnes**.	Annual water savings of **150,000 tonnes**
Water conservation renovations for non-production links	Polysilicon	• Inner Mongolia Xinhuan designed and installed a micro-spray irrigation system for the plant's landscaped lawns, creating automated, even, and atomized irrigation.	Annual water savings of **9,500 tonnes**

[13] The targets cover all polysilicon bases and 100% of polysilicon production.

[14] The targets cover all silicon wafer bases and 100% of silicon wafer production.

[15] Due to market conditions, the Group's silicon wafer capacity utilization rate declined in 2025, resulting in an upward trend in silicon wafer water use intensity.

Inner Mongolia Xinhuan Implements Landscaping Water Conservation Renovations

In 2025, to improve landscaping water use efficiency at the plant, Inner Mongolia Xinhuan designed and implemented a micro-spray irrigation system renovation to address the high water consumption and uneven distribution associated with traditional flood irrigation methods. The project installed a total of 2,500 micro-spray heads and laid 5,295 meters of above-ground piping and 785 meters of underground piping, creating an automated, even, and atomized irrigation network covering the entire area and enabling precise water control and intelligent management. Compared with traditional flood irrigation, the system improved water-saving efficiency by more than 50%, saving approximately 9,500 tonnes of irrigation water annually and reducing annual water resource costs by RMB 69,400, significantly lowering water consumption and reducing operation and maintenance costs.

The project installed a total of
2,500 micro-spray heads

Above-ground piping
5,295 meters

Underground piping
785 meters

The system improved water-saving efficiency by more than
50%

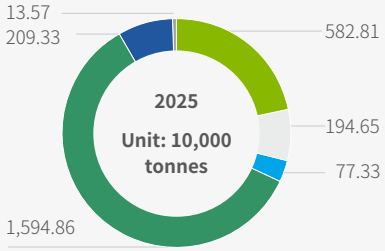
Saving approximately
9,500 tonnes
of irrigation water annually

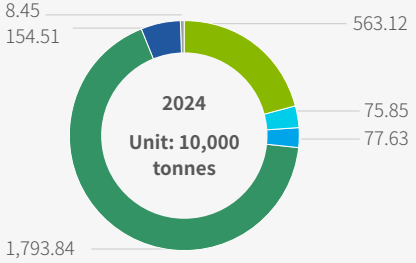
Reducing annual water resource costs by
RMB69,400

GCL Technology actively encourages employees and suppliers to jointly pursue water-saving initiatives. All bases conduct regular water-saving training sessions each year and conduct in-depth water conservation awareness campaigns through a variety of formats, including thematic knowledge lectures, team-based study of water-saving technology, "Water Conservation Promotion Week" activities, and thematic analysis meetings. In 2025, Jiangsu Zhongneng organized training on the *Energy and Water Conservation Management Guidelines*, further clarifying responsibilities and work requirements for resource management, covering key links such as target planning, daily operations management, data reporting and metrics assessment, and effectively enhancing energy and water conservation awareness and execution capabilities across all employees.

GCL Technology's Water Consumption in 2024-2025

	Total water withdrawal[16]	Total water savings	Total water consumption[17]	Total water usage[18]
2025	582.81 ten thousand tonnes	375.37 ten thousand tonnes	1,739.02 ten thousand tonnes	2,672.57 ten thousand tonnes
2024	563.12 ten thousand tonnes	141.14 ten thousand tonnes	1,760.54 ten thousand tonnes	2,673.40 ten thousand tonnes





- Freshwater withdrawal
- Externally supplied reclaimed water usage
- Ultra-pure water usage
- On-site reclaimed water usage
- Rainwater harvesting usage
- Other water sources usage

	The proportion of alternative water sources used for polysilicon	The proportion of alternative water sources used for wafers	Overall percentage of alternative water source use[19]	Total water recycling rate
2024	91.86%	60.48%	78.32%	96.27%
2025	**85.41%**	**58.19%**	**76.48%**	**98.00%**

Total water consumption intensity (ten thousand tonnes / USD million revenue)

2024	2025
0.84	**0.85**

Total water use intensity (ten thousand tonnes / USD million revenue)

2024	2025
1.27	**1.30**

[16] Total water intake includes the volume of fresh water directly withdrawn from external water sources such as natural water bodies (surface water, groundwater) and municipal pipe networks.

[17] Total water consumption includes the volume of water resources consumed during production and operation.

[18] Total water use includes the total volume of water resources used directly or indirectly in all activities throughout the year, covering fresh water intake, ultrapure water use, rainwater harvesting and reuse, external reclaimed water use, reclaimed water recycling, and other types of water consumption.

[19] Alternative water source usage includes external reclaimed water usage, rainwater harvesting and reuse, on-site reclaimed water recycling, and other types of water consumption.

Energy Management

GCL Technology has consistently regarded improving energy efficiency as a core driving force for sustainable development, systematically advancing energy conservation and consumption reduction across the entire value chain. In 2025, the Group focused on the energy saving potential of each link in production and operations, thoroughly explored opportunities for energy saving, and comprehensively promoted energy efficiency improvement through multidimensional measures such as process innovations, operational optimizations, and technological upgrades. This year, the Group achieved 100% implementation of the ISO 50001 Energy Management System across its main operations.

In 2025, GCL Technology continued to improve energy efficiency, optimize the energy mix, intensify technical retrofits for energy saving, and enhance its digital energy management and control system, fully reaching industry energy efficiency benchmarks. Based on their respective process characteristics and actual operating conditions, the group's production bases implemented special measures such as equipment retrofits, process optimization, waste heat recovery, and management enhancement, achieving full coverage of energy efficiency improvement measures across key operations and processes. During the reporting period, all bases of the group implemented a total of **12** energy-saving technical retrofits, and these initiatives are expected to save approximately **71,317 MWh**, continuously reducing energy consumption per unit of product. For the Group's specific pathway planning and measures for energy saving and carbon reduction, please refer to the Climate Change Strategy section.

During the reporting period, Inner Mongolia Xinyuan was named to the **2025 list of "front-runner" enterprises in energy efficiency for key industries jointly** released by the Ministry of Industry and Information Technology of the People's Republic of China, the National Development and Reform Commission (NDRC), and the State Administration for Market Regulation, demonstrating the Group's leading capabilities and outstanding achievements in the green and low-carbon transition and energy efficiency management.

GCL Technology's bases regularly conduct energy-saving training sessions covering the efficient use of office equipment, daily energy-saving practices such as turning off power and water promptly when not in use, as well as key links including the scientific operation and management of production equipment and process optimization.

GCL Technology's Energy Targets and Progress in 2025[20]

Targets

By 2030, electricity consumption per unit of silicon-based new material products will decrease by 12% compared with 2023

2025 Target Achievement — **Achieved**

Electricity consumption per unit of silicon-based new materials: **31.18 MWh/tonne of polysilicon**, down by **14.2%** compared with 2023

[20] The targets cover all production bases and 100% of the output of relevant products.

GCL Technology's Highlight Projects for Energy Conservation and Consumption Reduction and Their Achievement in 2025

Silicon Powder	Inner Mongolia Xinyuan expanded external sales of waste heat, achieving comprehensive utilization of waste heat.	External steam sales increased by **77,500 tonnes**, saving **7,362.5 tonnes** of standard coal.
Polysilicon	Jiangsu Zhongneng changed the heat source for certain units from steam to high-temperature condensate, eliminating steam consumption by these units and effectively reducing production costs.	Steam consumption was reduced to zero, generating annual cost savings of **RMB 1.36 million** and annual steam savings of **44,000 tonnes**.
	Jiangsu Zhongneng advanced a retrofit to generate steam as a by-product from condensate, creating fuller utilization of heat from high-temperature condensate, improving water use efficiency, and reducing energy consumption and carbon emissions from coal combustion.	Annual steam savings reached **22,000 tonnes**, with cost savings of approximately **RMB 3.42 million**.
	Jiangsu Zhongneng improved energy efficiency by optimizing production planning and adding interconnected pipelines, including those for compressors, thereby reducing the number of operating units.	Annual savings amounted to **13,824 tonnes** of steam and **26.741 million** kilowatt-hours of electricity, reducing production costs by **RMB 96.3756 million**.
	Jiangsu Zhongneng pursued process adjustments and pipeline network optimization to improve the utilization rate of by-product low-pressure steam, reduce reliance on externally purchased high-pressure steam, and deliver significant energy savings and emission reductions as well as economic benefits.	Annual steam savings amounted to **44,640 tonnes**, while by-product steam increased by approximately **49,600 tonnes**, generating cost savings of **RMB 20.81 million**.
	Inner Mongolia Xinyuan replaced the catalysts in two low-efficiency silane reaction towers to reduce steam consumption per unit.	Annual steam savings were approximately **147,576 tonnes**.
	Inner Mongolia Xinyuan replaced steam with steam condensate in processes such as the heating exchange station and ultrafiltration inlet water for the desalinated water station, thereby reducing steam consumption.	Annual steam savings were approximately **48,456 tonnes**.
	Inner Mongolia Xinyuan lowered the pressure control setpoint of the steam pipeline network and increased tail gas temperature, significantly increasing by-product steam output from certain units.	Annual steam savings were approximately **43,800 tonnes**.
	Inner Mongolia Xinyuan installed high-precision filters to recover and reuse dust-laden vented hydrogen after filtration, avoiding waste from hydrogen venting, and routed replacement hydrogen emissions from certain processes to the hydrogen compression unit for reuse.	Annual hydrogen savings amounted to **3.816 million Nm^3**, corresponding to reductions of **19.035 million kWh** in electricity consumption.
	Inner Mongolia Xinhuan added a pre-reaction process to increase silane gas production volume and reduce steam consumption per unit.	Steam consumption per unit in the silane gas section was down YoY by **12.84%**, with annual steam savings of **125,700 tonnes**.
	Inner Mongolia Xinhuan conducted regular inspections of loss points to reduce hydrogen element losses and ease the load on electrolyzers.	Electricity consumption per unit for hydrogen production decreased by **23.47%** compared with 2024, with annual electricity savings of **19.15 million kWh**.
Wafer	Xuzhou Photovoltaic carried out optimization and upgrading of the slicing machine and the hot water system of the cleaning machine in the wafer workshop, effectively improving equipment processing efficiency; meanwhile, it replaced energy-saving motors to further enhance energy-saving performance.	Cumulative annual electricity savings reached **6.391 million kWh**.

Hot Water Retrofit Project for the Cleaning Machine in the Wafer Workshop

In 2025, GCL Technology implemented a hot water system retrofit project for cleaning machines in the wafer workshop. To address issues such as the large gap between the cleaning machines' water supply temperature and process requirements, hot water discharge, and high energy use from continuous equipment heating, the Group established a direct hot water supply system and a waste heat recovery system to reduce the need for secondary water heating. At the same time, through measures such as using heat exchangers to recover waste heat from discharged wastewater, preheating purified water and steam heating, and reusing water after cooling, it efficiently achieved circular resource utilization and waste heat recovery. The project saved RMB 2.59 million in annual electricity costs and RMB 870,000 in water costs, with total annual benefits reaching RMB 3.4589 million, significantly improving energy efficiency and the level of resource circulation.

Saved	Water costs	Total annual benefits reaching
2.59 million in annual electricity costs	RMB 870,000	RMB 3.4589 million

Optimization of AC Systems in the Silicon Powder Briquetting Workshop

In 2025, to address issues in the workshop's original AC systems, including redundant configuration and actual cooling demand being far lower than designed capacity, GCL Technology conducted systematic diagnosis and optimization retrofits. By accurately calculating the workshop's heat load, it shut down high-energy-consumption idle units, achieving centralized allocation and shared operation of cooling resources. After the retrofit, system operating efficiency improved significantly. While meeting process temperature control requirements, the project saved RMB 1.3487 million in annual electricity costs, increased equipment utilization by more than 35%, and effectively reduced energy waste and carbon emissions.

Saved	Increased equipment utilization by more than
RMB 1.3487 million in annual electricity costs	35%

[21] The comprehensive energy consumption data is calculated in accordance with the General Principle for Calculation of Comprehensive Energy Consumption (GB/T 2589-2020).

[22] Due to adjustments in statistical calibers, the relevant data for fiscal year 2024 have been restated accordingly.

[23] Due to adjustments in statistical calibers, the relevant data for fiscal year 2024 have been restated accordingly.

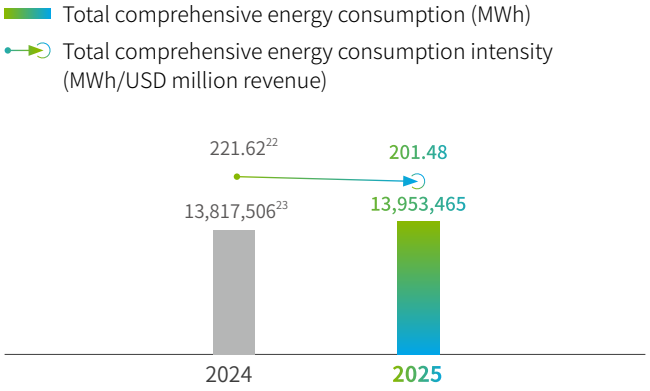
[24] Due to the decline in capacity utilization rate of silicon wafer enterprises in 2025, the comprehensive energy consumption intensity showed an upward trend.

Insulation Retrofit Project for Casting Furnaces in the Polycrystalline Workshop

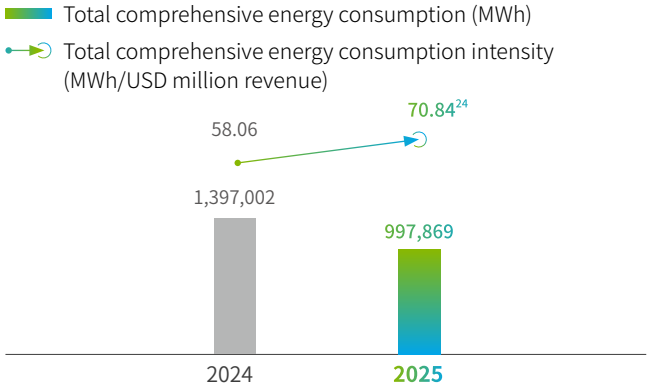
In 2025, GCL Technology implemented a retrofit project for the thermal field insulation system of polycrystalline casting furnaces. To address issues such as poor insulation performance of casting furnaces, severe heat loss, and high electricity consumption costs, the Group improved overall insulation performance through measures such as increasing the thickness of the thermal field insulation layer and the number of insulation strips, and also promoted the CRP process and other integrated measures to reduce furnace pressure and thermal conductivity. After the retrofit, the unit electricity consumption of the G7 casting furnace decreased by 19.4%, and annual electricity cost savings reached RMB 25.5826 million, significantly improving energy efficiency.

GCL Technology's Energy Use of the Polysilicon Segment and Wafer Segment in 2024-2025[21]

Polysilicon



Wafer



Packaging Material Management

GCL Technology follows the guidelines of "environmental protection, reduction, and recycling" and advances the green transformation of packaging materials. Through recycling and reuse and tiered management, it improves the recycling rate of major packaging materials such as cardboard boxes, wooden pallets, PE products, EPE foam, and silicon powder bags, effectively reducing resource consumption.

In 2025, all bases implemented packaging reduction measures tailored to their specific conditions.

Packaging Recycling

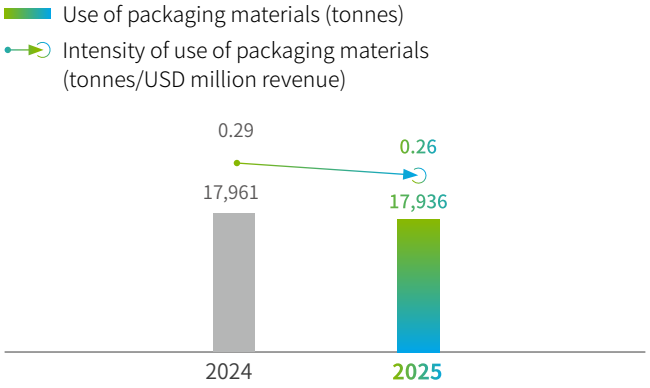
- Inner Mongolia Xinyuan promoted the circular use of silicon powder packaging bags, effectively reducing packaging bag usage by 38%.
- Xuzhou Solar Energy Material promoted the recycling and reuse of finished product packaging, saving a cumulative RMB 1.1961 million during the year, with an average savings rate of 60.35%.
- Suzhou GCL increased the proportion of recycled board materials used and effectively reduced packaging costs while ensuring stable and reliable cutting performance.

Packaging Reduction

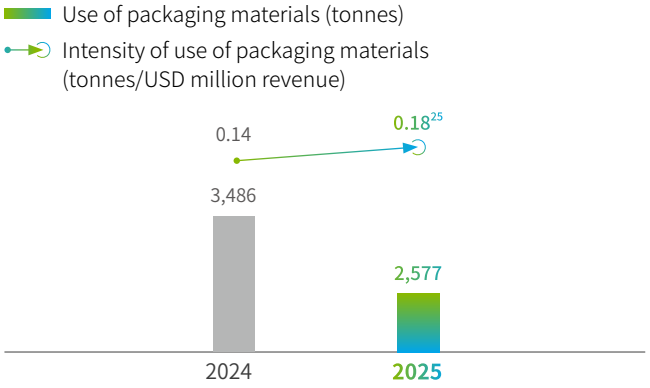
- Suzhou GCL eliminated the plastic bagging step in wafer packaging and fully adopted long-fiber sulfite paper as a replacement, achieving zero procurement cost for plastic bags.

GCL Technology's Packaging Material Use for the Polysilicon Segment and Wafer Segment in 2024-2025

Polysilicon



Wafer



[25] Due to the decline in capacity utilization at silicon wafer enterprises in 2025, the intensity of packaging material usage showed an upward trend.

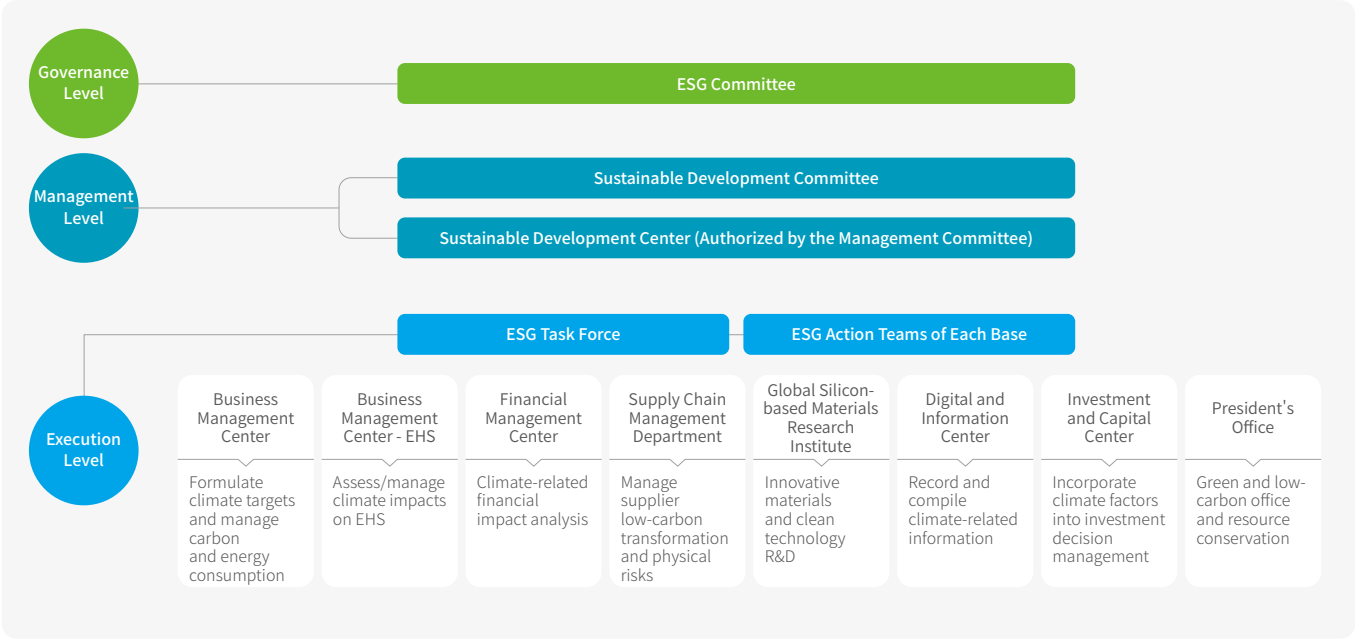
Climate Change

Governance

GCL Technology has consistently placed sustainable development at the core of its strategy. Guided by the philosophy of green development, it fully recognizes that sound corporate governance is a cornerstone for ensuring the Group's ability to respond to climate change and the management of climate risks and opportunities. On this basis, we have established a comprehensive climate governance structure.

Governance Structure

GCL Technology attaches great importance to the standardization and effectiveness of corporate governance and has established a rigorous and comprehensive governance system. Adhering to integrity and compliance as its principles, the Group continues to optimize governance processes, improve efficiency, and strengthen its ability to respond to risks. At the same time, it strictly upholds information security standards to ensure stable and reliable operations, thereby consolidating the foundation for and injecting momentum into the Group's sustainable and high-quality growth.



Climate Change Governance Structure

Climate Change Governance Structure

Governance Level

ESG Committee

Responsible for overseeing and reviewing the Group's climate strategy and action plans, identifying material climate risks and opportunities, monitoring the progress of climate risk-related work and putting forward suggestions, reviewing the annual ESG report, and regularly reporting ESG-related work to the Board.

Management Level

Sustainability Management Committee

Chaired by the Joint CEO, with the heads of key functional departments and business divisions serving as committee members, it is responsible for reviewing the ESG indicator system, approving management objectives, formulating annual plans and leading their implementation, studying the Group's climate change topics and progress on related metrics and putting forward suggestions, and organizing and coordinating resources across all levels of the organization to guide the fulfillment of targets.

Sustainable Development Center: authorized by the Management Committee

Responsible for managing and supervising the specific execution of work related to the ESG indicator system; advancing integrated work with the listed Company as the main entity, assisting in the implementation of climate change response-related work requirements initiated by subsidiaries, and regularly reporting to the Sustainability Management Committee.

Execution Level

ESG Task Force: composed of various departments of GCL Technology

Responsible for improving and managing the indicator system, formulating management objectives and annual plans; breaking down disclosure items and assigning them to the bases; recording, compiling statistics on, and submitting assigned information in accordance with management requirements; auditing the authenticity and validity of information and analyzing the reasons for data changes; collecting feedback on reporting issues and/or suggestions to improve quality.

Institutional Frameworks

GCL Technology upholds the philosophy of sustainable development and takes green development as its guiding principle. To standardize climate change response and fulfill social responsibility, it has formulated the *Measures for Climate Risk Management*, incorporated climate risks and response measures into relevant policies and procedures, and promoted their implementation in daily operations.

Climate Risk-Related Policies and Procedures

Climate Change Response	*Measures for Climate Risk Management* *Environmental Protection Management Policy*
Tendering and Procurement	*Procurement Management Policy* *Sustainable Procurement Guidelines*
Labor Rights	*Labor Practices Policy* *Training Management Standard*
Emergency Response Management	*Special Emergency Response Plan for Safety, Health and Environmental Emergencies* *General Emergency Response Plan for Emergencies* *Emergency Response Management System*
Safe Production	*Safe Production Management System*
Energy Management	*Energy Management Manual* *Energy Management System*
Greenhouse Gas Management	*Greenhouse Gas Management Manual* *Management System for Greenhouse Gas Emission Source Identification and Target and Indicator Management* *Management System for Greenhouse Gas Accounting, Reporting and Verification* *Greenhouse Gas Control Management System* *Greenhouse Gas Monitoring Management System*

Capacity Building for Risk Management

Lan Tianshi
(Joint Chief Executive Officer)

With nearly 20 years of experience in chemical manufacturing and production management, Mr. Lan has long been deeply engaged in the core production processes of photovoltaic silicon materials. He possesses a solid practical foundation in industrial climate risk identification, energy efficiency management and control, and low-carbon process optimization, enabling him to promote the deep integration of climate risk management with the Group's operations from an overall business perspective. Furthermore, his professional background and technical qualifications in chemical engineering provide strategic guidance and specialized support for the Group's efforts in carbon management, climate risk prevention and control, and other related areas.

Yeung Man Chung, Charles
(Chief Financial Officer and Company Secretary)

With over 30 years of experience in accounting, auditing, and financial management, he is a member of the Hong Kong Institute of Certified Public Accountants and the Australian Society of Certified Practicing Accountants. He has been deeply involved in ESG management and climate governance, integrating low-carbon development goals into financial planning and strategy, advancing the commercialization and implementation of low-carbon technologies such as granular silicon and carbon footprint management, and supporting the Group in its climate change response and carbon neutrality transition.

Li Junfeng
(Independent Non-Executive Director)

A leading authority in renewable energy and climate change, he previously served as Director of the National Center for Climate Change Strategy and International Cooperation. His outstanding climate expertise and extensive experience provide the Group with highly professional guidance, significantly enhancing its professionalism in climate change response.

Shen Wenzhong
(Independent Non-Executive Director)

With deep expertise in the field of photovoltaic science and technology, he has participated in a number of national-level scientific research projects, published numerous international academic papers, and authored photovoltaic monographs. From the perspective of a technical expert, he provides professional guidance for the iteration of the Group's low-carbon polysilicon technologies such as granular silicon, supporting technological innovation in photovoltaic technology to accelerate the energy transition and address the challenges of climate change across the world.

The Group invited renowned industry experts to conduct climate risks capacity-building training sessions to enhance the understanding of climate risks among all levels and relevant departments. The content covered topics including climate-related principles and disclosure standards, the impacts and transmission of climate risks, scenario analysis, domestic and international carbon market development trends, and the integration of climate risks into business strategy. Driven by capacity building, the Group has integrated climate risk factors into strategy, R&D, and production and operations, and has issued forward-looking climate targets. Through measures such as energy efficiency management, process optimization, and innovation, it is progressively implementing its short-term, medium-term, and long-term climate targets.

Strategy

Climate Targets and Progress

GCL Technology Climate Strategy

Climate Vision

Against the backdrop of the global green transition, GCL Technology takes reducing the carbon intensity of its products and operations as its core focus, comprehensively advancing emission reduction across the entire value chain and low-carbon operations, and continuously strengthening its carbon reduction advantages driven by capability enhancement.

Climate Strategy

Innovation
Low-Carbon Technology Innovation

Integration
Industrial Ecosystem Integration

Intelligence
Digital and Intelligent Empowerment

Impact
Global Climate Impact

Climate Action Targets

Short-Term (2023-2026)

By 2026, GCL Technology's Scope 1+2 greenhouse gas emission intensity per unit of product will decrease by 12% compared with 2023 (the baseline year), covering all operational activities.

Medium-Term (2026-2030)

By 2030, GCL Technology's Scope 1+2 greenhouse gas emission intensity per unit of product will decrease by 18% compared with 2023 (the baseline year), covering all operational activities.

Compared to the baseline year of 2023, the power consumption per unit of silicon-based new material products will decrease by 12% by 2030.

Long-Term (2030-2050)

Achieve carbon neutrality at the operational level no later than 2040,

and achieve carbon neutrality across the entire value chain no later than 2050.

Climate Action Pathways

1. Operational Level

- Energy efficiency improvement
- Renewable electricity use
- Zero-carbon heat supply
- Reducing energy consumption through intelligent manufacturing

2. Value Chain

- Low-carbon procurement
- Logistics decarbonization
- Green supply chain management
- Collaborative emission reduction in the photovoltaic industry chain
- Resource recycling and waste management

3. Offsetting and Removal

- Offsetting emissions using removal-based carbon credits
- Exploring removal technologies such as CCUS and biochar

4. Product Carbon Footprint Reduction Pathways

- Silicon powder: Improve energy efficiency and heat exchange efficiency
- Polysilicon: Equipment interconnection and pipeline integration, process optimization
- Silicon wafers: Lean management

5. System Support

- Energy Management System
- Carbon Management System
- Sustainable Supply Chain Management System
- Digital Management System
- Talent Management System
- Technology and R&D System

Guided by the trend of the global green transition, GCL Technology has focused on the dual reduction of product and operational carbon intensity, systematically advancing emissions reduction across the entire value chain and low-carbon operations while continuously strengthening its intrinsic carbon reduction capabilities. Anchored in the "4I" strategic framework, GCL Technology has established a three-phase climate action roadmap covering 2023–2050, systematically promoting the energy transition and climate resilience building from green manufacturing and carbon asset management to supply chain emissions reduction and the output of global standards.

In active response to the national "dual carbon" strategy and global climate governance requirements, since 2023, GCL Technology has for three consecutive years conducted GHG inventories based on ISO 14064-1:2018, *Greenhouse Gases — Part 1: Specification with Guidance at the Organization Level for Quantification and Reporting of Greenhouse Gas Emissions and Removals*, and the GHG Protocol *Corporate Accounting and Reporting Standard*, with certification by TÜV SÜD, to ensure the standardization, accuracy, and authority of data accounting.

GCL Technology adopts a carbon target-setting methodology that combines "top-down overall guidance" with "bottom-up implementation and scenario-based analysis." Closely aligned with the requirements of the national "dual carbon" strategy and based on historical emissions data, the Group systematically defines the accounting boundaries for operations and the entire value chain, reviews its overall emissions structure, and identifies key sources of emissions such as coal, purchased electricity, and core raw materials. It also coordinates and reviews process routes for core business operations, technology iteration, equipment upgrades, energy structure optimization, low-carbon procurement, and logistics optimization, and, in combination with the existing emissions reduction measures at all bases and future production capacity planning, assesses trends in product carbon emissions intensity per unit, thereby setting the Group's short- and medium-term carbon emissions reduction targets and the overall long-term direction of carbon neutrality across the entire value chain from the top down. At the same time, all bases examine actual performance, review local energy-saving retrofits and carbon reduction plans, and calculate emissions reduction potential from the bottom up while verifying target feasibility, thereby ensuring that carbon targets are scientific, reasonable, and practicable.

To actively address the challenges of climate change, the Group further completed the formulation of medium- and long-term GHG emissions targets. The specific greenhouse gas emission reduction targets and progress are as follows:

Targets		2025 Target Achievement
Short-term	• By 2026, the Group's GHG emissions intensity per unit of product for Scope 1 + 2 will decrease by 12% compared with 2023 (baseline year), and the target covers all operations.	Achieved Compared with 2023, the Group's GHG emissions intensity per unit of product for Scope1+2 decreased by **15.18%** (location-based) and decreased by **35.47%** (market-based) respectively.
Medium-term	• By 2030, the Group's GHG emissions intensity per unit of product for Scope 1 + 2 will decrease by 18% compared with 2023 (baseline year), and the target covers all operations. • Using 2023 as the baseline year, electricity consumption per unit of silicon-based new material products will decrease by 12% by 2030.	
Long-term	• Achieve operational carbon neutrality no later than 2040. • Achieve full value chain carbon neutrality no later than 2050.	

Carbon Emissions Reduction Pathway for Own Operations

GCL Technology comprehensively reviewed the carbon emissions profile of its own operations, formulated a systematic emissions reduction pathway, and has fully covered the Group's 12 production bases. Based on its greenhouse gas (GHG) emissions structure over the years, Scope 1 GHG emissions account for more than 60% of all operational GHG emissions. Therefore, improving energy efficiency, optimizing the energy structure of renewable electricity, and promoting the green transition of conventional energy have become key priorities in the Company's energy conservation and emissions reduction efforts.

Category of Energy Efficiency Improvement	Measures for Energy Efficiency Improvement	Main Business Areas Covered	Energy-Saving Achievements
Energy-saving upgrades and retrofits for equipment	• Promote the application of high-efficiency energy-saving motors to maximize energy-saving results • Promote the upgrading of inefficient equipment to high-efficiency energy-saving equipment and continuously improve overall equipment energy efficiency	Wafer	• Estimated savings of 6.391 million kWh
Waste heat recovery and cascade utilization of energy	• Optimize the operational management and control of the steam pipeline network and increase the unit's steam by-product generation capacity through refined parameter control, achieving efficient recovery of thermal energy • Optimize the matching structure of heat sources for the unit, replace high-grade steam with medium- and low-grade thermal energy, reduce steam consumption, and promote the cascade utilization of energy • Conduct process and pipeline network collaborative optimization, improve the comprehensive utilization rate of by-product low-pressure steam, and reduce reliance on externally purchased high-pressure steam	Silicon powder Polysilicon	• Estimated standard coal savings of 7,362.5 tonnes • Estimated steam savings of approximately 202,900 tonnes
Process optimization	• Optimize process pathways and operation procedures, improve production efficiency and product output, and effectively reduce energy use per unit of product	Polysilicon	• Estimated steam savings of 125,700 tonnes
Management optimization	• Advance pipeline interconnection and coordinated system planning, optimize equipment operating load allocation, reduce redundant operations, and improve equipment and energy utilization efficiency • Improve the equipment operation and maintenance management system, optimize maintenance operation procedures, and ensure the stable and efficient operation of equipment	Polysilicon	• Estimated steam savings of 161,400 tonnes • Electricity savings of 64.926 million kWh

Through measures such as equipment energy efficiency upgrades, equipment energy-saving retrofits, and cascade utilization of energy, GCL Technology achieved a decline in comprehensive energy consumption per unit of product. In 2025, the product comprehensive energy consumption density was 78.70 MWh/MW of wafers, representing a 3.62% decrease compared with 2024.

[26] Due to adjustments in statistical calibers, the comprehensive energy consumption intensity data for products for the years 2023–2024 have been restated.

GCL Technology's Product Comprehensive Energy Consumption Intensity Data in 2023-2025[26]

Indicator	Unit	2025	2024	2023
Comprehensive energy consumption intensity	MWh/MW of wafers	78.70	81.65	85.24

Renewable Energy Use

GCL Technology has expanded diversified clean energy applications through green electricity trading and distributed photovoltaic systems. In 2025, the total use of renewable energy across all bases of the Group increased by 1,771,692.9 MWh, and the share of renewable electricity increased to 56%, with the share of clean energy steadily increasing. Among them, the scale and share of renewable electricity consumption in the Inner Mongolia region remained at the leading level among all production bases. Building on the existing foundation, the Group will coordinate the use of approaches such as green electricity trading, green certificate procurement, and on-site photovoltaic power generation to gradually improve the mechanism for the use of renewable energy at the regional and group levels, and further increase the use of renewable energy.

In 2025

The total use of renewable energy across all bases of the Group increased by

1,771,692.9 MWh

GCL Technology's 2025 Renewable Energy Targets and Progress[27]

Targets

Achieve a

100%

share of renewable energy use by 2040

2025 Target Achievement

The share of renewable energy use reached

56%

[27] The targets cover all production bases and 100% of the output of relevant products.

Fishery-Solar Integration Supports the Green Transition

Xuzhou Photovoltaic has implemented and operates a 10 MW fishery-photovoltaic complementary demonstration project. By making integrated use of the space of aquaculture ponds, it adopts a composite, three-dimensional development model of "PV installations above water and aquaculture below water," significantly improving the overall efficiency of solar energy and land resource utilization while achieving intensive land use.

Leveraging the favorable local solar irradiation conditions, the project continues to generate clean electricity in a stable manner. In 2025, it cumulatively supplied more than 15 million kWh of green electricity to the plant area, effectively increasing the Group's clean energy self-sufficiency ratio and reducing its reliance on externally purchased conventional thermal power. The fishery-photovoltaic complementary project is an important practice by GCL Technology in advancing the green and low-carbon transition, creating synergistic efficiency gains through the integration of "clean energy + ecological aquaculture + intensive land use." Each year, it can save approximately 1,843.5 tonnes of standard coal and reduce carbon emissions by approximately 12,400 tonnes.

In 2025

Green electricity to the plant area

15 million kWh

Save approximately

1,843.5 tonnes

of standard coal

Reduce carbon emissions by approximately

12,400 tonnes

Xuzhou Photovoltaic Fishery-Photovoltaic Complementary Power Generation Demonstration Project

Scope 3 - Value Chain Emissions

In 2025, the Group continued to conduct third-party verification of Scope 1, 2, and 3 greenhouse gas (GHG) emissions for five subsidiaries, namely Jiangsu Zhongneng, Xuzhou Photovoltaic, Leshan GCL, Inner Mongolia Xinyuan, and Inner Mongolia Xinhuan. Going forward, it will focus on deepening Scope 3 emissions management by tracing carbon footprints across the supply chain and collaborating on emission reduction at key stages, thereby building a low-carbon ecosystem covering the entire value chain[28]. In 2025, GCL Technology's total Scope 3 greenhouse gas emissions amounted to **13,063,363.36** tCO_2e, accounting for **68%** of total emissions across the entire value chain (Scope 1, 2, and 3 emissions).

Scope 3 GHG Emissions of GCL Technology's Five Carbon Verification Bases

Type	Unit	2025
Total Scope 3 emissions	tCO_2e	13,063,363.36
Category 1 Purchased goods and services	tCO_2e	3,099,503.80
Category 2 Capital goods	tCO_2e	5,749.30
Category 3 Fuel- and energy-related activities	tCO_2e	1,185,965.58
Category 4 Upstream transportation and distribution	tCO_2e	378,219.90
Category 5 Waste generated in operations	tCO_2e	6,163.70
Category 6 Business travel	tCO_2e	1,253.34
Category 7 Employee commuting	tCO_2e	4,213.18
Category 8 Upstream leased assets	tCO_2e	2,154.88
Category 9 Downstream transportation and distribution	tCO_2e	123,406.47
Category 10 Processing of sold products[29]	tCO_2e	8,199,032.17
Category 11 Use of sold products	tCO_2e	0
Category 12 End-of-life treatment of sold products	tCO_2e	0
Category 13 Downstream leased assets	tCO_2e	268.64
Category 14 Franchises	tCO_2e	0
Category 15 Investments	tCO_2e	57,432.40

Scope 3 Emissions Reduction Pathway

Green Supply Chain Management

GCL Technology has established a green and low-carbon evaluation mechanism, incorporating requirements related to environment, occupational health and safety, and carbon emissions into supplier lifecycle management, and will, in the medium to long term, use suppliers' carbon emissions intensity performance as an important basis for procurement decisions. Leveraging the Supply Chain Management platform and Carbon Management platform, the Group implements unified traceability and carbon footprint management for various key materials.

On the procurement side, the Group advances Scope 3 emissions reduction through low-carbon procurement, using bulk raw materials as a breakthrough point to reduce Scope 3 carbon emissions per unit of product in phases.

In logistics, the Group promotes the optimization of transport and vehicle mix, incorporates the use of new energy vehicles and emissions reduction requirements into contracts, and establishes an integrated supply chain emissions reduction system combining "procurement + logistics."

Low-Carbon Management Practices for Suppliers

GCL Technology continues to monitor the impacts of climate change on the supply chain and works with supplier partners to explore corresponding methods for enhancing supply chain climate resilience. The Group has established greenhouse gas management-related requirements across supplier onboarding, audit, cooperation, and other links.

- **Supplier onboarding:** the Group has formulated the *GCL Group Supply Chain Partner Code of Social Responsibility*, which incorporates carbon emissions management requirements, and requires partners to sign it.
- **Audit:** the Group incorporates carbon emissions management requirements into supplier audits and, through such audits, conducts low-carbon advocacy and exchanges.
- **Cooperation:** suppliers are required to support the Group's research on supply chain carbon emissions management and are invited to participate in the Group's special ESG training sessions on the supply chain.

2025 Management Performance

The Group conducted thematic ESG audits for

50

core and key suppliers

Encouraged

518 suppliers

to participate in the Group's long-term ESG capacity-building program

[28] The greenhouse gas accounting methods and factors are implemented in accordance with the *Guidelines for Accounting and Reporting of Greenhouse Gas Emissions in 24 Industries* issued by the National Development and Reform Commission, ISO 14064-1:2018, and the GHG Protocol. Purchased electricity is accounted for based on the *2023 Power Sector Carbon Dioxide Emission Factors*.

[29] Category 10 Processing of Sold Products has been identified as one of the Group's material value chain emission categories. As emissions in this category are primarily generated during downstream customers' further processing of the Group's products, they are significantly influenced by external factors such as customer processes, energy mix, regional power grids, and product flows. Moreover, the availability, completeness, and comparability of relevant data still require improvement. Therefore, the Group has not yet included this category in its current value chain carbon neutrality targets or the boundary of quantitative emission reduction actions. In the future, the Group will continue to improve the relevant accounting methodologies and data foundation, and will assess the feasibility of gradually incorporating this category into its value chain emission reduction targets and action pathways once conditions are mature.

Circular Resource Utilization and Waste Management

GCL Technology has included water usage, energy management, and the treatment of waste gas, wastewater, and solid waste as key topics under environmental management and established binding targets. Through process optimization, recycled water and reclaimed water reuse, cooling system upgrades, and other measures, it has enhanced the recycling of water resources. At the same time, it advances resource recovery of waste and ensures compliant disposal of hazardous waste. By optimizing packaging solutions, improving loading efficiency, and promoting the recycling of packaging materials, the Group reduces packaging material consumption and solid waste generation intensity per unit product, thereby strengthening the foundation for emissions reduction across the full life cycle.

Product Life-Cycle Carbon Footprint Management

Against the backdrop of the intensifying global climate action and increasingly stringent "green" trade barriers, downstream clients are paying growing attention to carbon emissions across the entire product life cycle. In major markets such as France, Italy, and Germany, product carbon footprint certifications have become a core reference for market access and project procurement, and relevant standards continue to be updated dynamically. For details on the Group's product life-cycle carbon footprint management, please refer to the Feature section "Decoding Low-Carbon: GCL Technology's Green DNA Empowering Global Energy Transition."

Identification and Assessment of Climate Risks and Opportunities

Climate Transition Scenarios

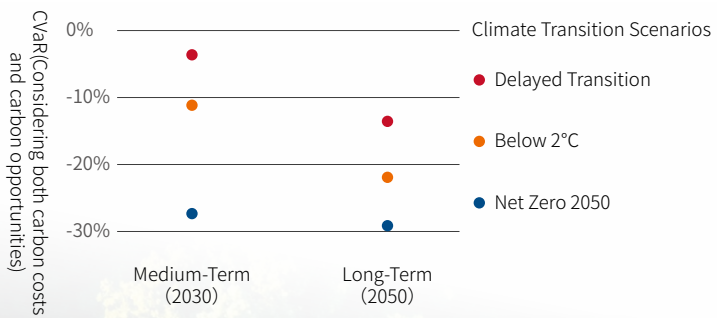
Climate scenarios refer to a series of qualitative narratives used to describe the complex interrelationships among climate risks and their environmental, economic, and social impacts. GCL Technology adopts NGFS climate scenarios (Net Zero 2050, Delayed Transition, and Below 2°C) to assess transition risks and opportunities.

NGFS Scenario Names	Warming Target	Corresponding SSP Scenario	Corresponding RCP Scenario
Ordered Pathways - Net Zero 2050	1.5°C	SSP1	RCP1.9
Disordered Pathways - Delayed Transition	1.7°C	SSP2	RCP2.6
Ordered Pathways - Below 2°C	1.8°C	SSP1	RCP2.6

Transition Opportunity Analysis

GCL Technology evaluates transition opportunities across the full lifecycle using a combined carbon cost and emission reduction benefit metric—CVaR (Carbon Value at Risk). The emission reduction benefit is quantified based on clean electricity generated from the conversion of polysilicon and wafer production into solar module output. Due to the lower carbon footprint of granular silicon, the full-lifecycle CVaR is negative under all three NGFS scenarios, indicating that the carbon benefits significantly outweigh the associated carbon costs. The negative carbon benefit is most pronounced under the Net Zero 2050 scenario, driven by stricter transition pathways and more robust carbon market policies. As dual carbon control policies deepen and the carbon market matures, the environmental value of green electricity and the Group's transition opportunities are expected to be increasingly unlocked.

CVaR of the Granular Silicon Business under Different Scenarios



Identification, Impact Analysis, and Response of Transition Opportunities

Opportunity Type	Opportunity Analysis	Opportunity Description	Short-Term	Medium-Term	Long-Term	Operations & Value Chain	Potential Financial Implications	Response Measures
Policy	Overseas enhancement of product carbon footprint requirements	The EU's CBAM mechanism has been implemented, and its future expansion may potentially include PV modules. Carbon pricing mechanisms in other overseas geographical regions may also be strengthened.	√	√	√	Own operations Downstream	If PV modules are included in the scope of CBAM, the comparative advantages of granular silicon will be strengthened, and its market share may increase.	Dynamically track and study global carbon pricing and carbon border tax developments. Optimize production presence and further reduce the product carbon footprint through green energy substitution and improved energy efficiency.
	Upgrades in domestic industry regulation and carbon market policies.	Industry regulation strengthens requirements for the full life-cycle carbon footprint of PV modules through standards. The domestic carbon market expands in scope to include the polysilicon industry, and carbon allowance prices rise.		√	√	Own operations	If included in the carbon market, granular silicon products will gain comparative advantages in product competitiveness and pricing due to their lower carbon intensity.	Advance climate targets as planned, reduce carbon emissions from our own production and upstream activities, and consolidate the advantage in product carbon footprint.
Technology	Development of low-carbon products	The Group's granular silicon technology produces polysilicon products with world-leading energy efficiency, leading technological innovation in the industry.		√	√	Own operations	Expanded market share, increased revenue and profit, and improved medium- to long-term cash flow.	Develop strategies for products such as granular silicon in the renewable energy sector and strengthen analysis of market trends. Develop next-generation technologies such as perovskite and advance mass production and large-scale application.
	Further tap carbon reduction potential.	Manufacturing processes and energy-saving technical upgrades can be optimized. Use photovoltaic and other renewable energy sources in production processes.	√	√	√	Own operations Upstream	The efficiency is improved, energy costs are saved, price advantages are secured, and profitability is enhanced.	Strengthen R&D on manufacturing processes and energy-saving technical upgrades, and promptly adopt the latest relevant technology. Coordinate with major upstream suppliers such as silicon powder to increase the use of renewable energy.
Market	The world's net-zero trend and concerns over energy security	More than 100 countries have proposed carbon neutrality or net-zero targets, and photovoltaic has become a backbone force for the energy transition, energy diversification, and energy security.	√	√	√	Own operations Downstream	Increase market share and boost revenue and cash flow by exploring new markets and acquiring new customers.	Closely monitor and study net-zero plans and progress in major economies, track demand for new energy driven by energy security requirements, and work with PV module partners to actively expand into overseas markets.

Identification, Impact Analysis, and Response of Transition Risks

Risk Type	Risk Factor	Risk Description	Short-Term	Medium-Term	Long-Term	Operations & Value Chain	Potential Financial Implications	Response Measures
Policy	Stricter emissions reduction policies in the PV industry	As the policies become more stringent, industry regulation imposes stricter standards on energy use and carbon emissions in photovoltaic material production.		√	√	Own operations Upstream Downstream	Efficient technologies and equipment must be adopted to meet the requirements, resulting in increased compliance costs.	Upgrade green technologies and renewable energy systems, reduce carbon emissions and product carbon footprint, regularly disclose data from carbon audits, and dynamically track the policies to control costs.
	The polysilicon industry's inclusion in the domestic carbon market	With the establishment of a new round of Nationally Determined Contributions (NDCs), domestic carbon market policies are becoming more stringent, coverage is expanding, and carbon allowance prices are rising.		√		Own operations	If included in the carbon market, compliance costs for carbon allowances will increase as carbon market pricing policies develop.	Advance climate targets as planned, reduce carbon emissions from own production and upstream activities, and ensure compliance preparedness.
Technology	Tech evolution	Technology iteration in the PV industry is rapid, and new technologies may replace granular silicon technology, delivering a lower product carbon footprint or higher power generation efficiency.	√	√		Own operations Downstream	Market share is replaced by new technologies and new products, resulting in declines in revenue and profit.	Accelerate process optimization for granular silicon and improve and refine product technical metrics. Build parallel R&D paths and accelerate deployment in non-silicon-based materials such as perovskite.
Market	Rising low-carbon supply chain expectations	Downstream clients are demanding lower-carbon standards for the supply chain. If requirements for a lower product carbon footprint cannot be met, there will be risks of reduced market share and weakened pricing power.		√	√	Own operations Downstream	Weakened product pricing power, reduced market share, and declines in revenue and profit.	Accelerate the establishment of full life cycle carbon footprint systems and improve data management. Continue to pursue product carbon footprint certifications to ensure that the products' low-carbon advantages receive authoritative market recognition.
	Price competition and demand fluctuation	Affected by macroeconomic, industry, and regulatory policies and overcapacity risks, supply and demand in the upstream photovoltaic materials market have become imbalanced, and price competition has led to margin compression.		√	√	Own operations Downstream	Reduced market share and profitability declines.	Further reduce energy use and carbon emissions levels, lower energy costs, and expand high-value, differentiated product lines.

Physical Risk Scenario

Physical risk analysis is based on the IPCC's SSP1-2.6 and SSP5-8.5 scenarios, reflecting climate-related risks under extreme future climate conditions.

Physical Risk Scenario	Scenario Description	Key Characteristics	Projected Global Temperature Rise by the End of the Century
SSP1-2.6	Greenhouse gas emissions decline to low levels by the end of the century. Warming is kept below 2°C , with socioeconomic development moving toward sustainability and low-carbon pathways.	Low-warming scenario	1.7°C
SSP5-8.5	Global average temperatures rise significantly, potentially exceeding 4°C above pre-industrial levels, with socioeconomic development driven by high fossil fuel dependence and high emissions.	High-warming scenario	3.3~5.7°C

Physical Risk	Low-Emission Scenario(SSP1-2.6)			High-Emission Scenario(SSP5-8.5)		
	Short-Term	Medium-Term	Long-Term	Short-Term	Medium-Term	Long-Term
Extreme Heat Wave	59.50%	62.16%	64.15%	59.50%	64.15%	88.30%
Typhoon	2.65%	2.65%	2.65%	2.65%	2.65%	2.65%
Flooding	0.00%	9.88%	9.88%	0.00%	9.88%	9.88%
Heavy Precipitation	0.00%	0.00%	0.00%	0.00%	2.65%	2.65%
Extreme Cold	27.96%	27.96%	27.96%	27.96%	27.96%	27.96%
Water Scarcity	73.76%	73.76%	87.46%	73.76%	75.76%	90.12%
Sea Level Rise	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

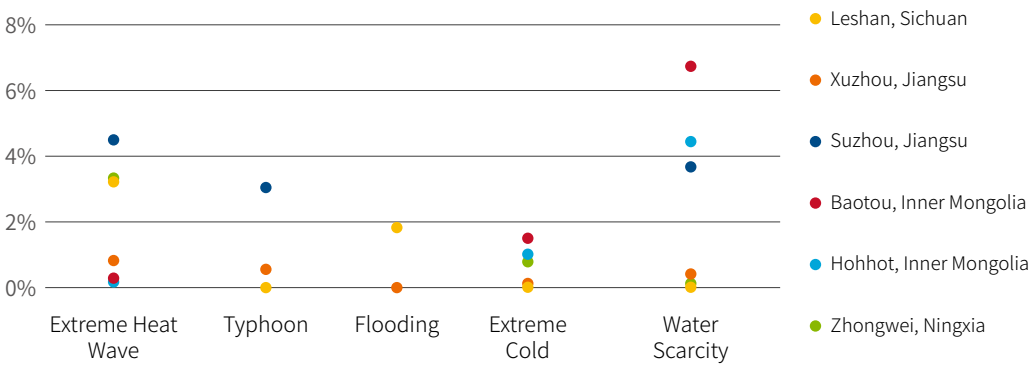
Physical Risk

As shown in the above chart, GCL Technology's asset exposure to physical climate risks is concentrated in two key areas: extreme heatwaves and water scarcity. Under the low-emission scenario, 87.46% of assets will be located in regions facing high water scarcity risk by 2050. Under the high-emission scenario, 88.30% of assets will be exposed to high risk from extreme heatwaves by 2050.

Physical Risk Financial Impact Assessment

Based on the materiality of various physical risks, GCL Technology has conducted a financial impact assessment for extreme heatwaves, typhoons, floods, extreme cold, and water scarcity. The assessment employs the Physical Value at Risk (PVaR) metric — defined as the discounted present value of cumulative physical risk losses over a given period, expressed as a proportion of total company assets. Loss components include physical asset damage, production downtime, and increased operational costs.

Physical Value at Risk (PVaR) under the SSP5-8.5 Scenario SSP5-8.5 Scenario



Taking the SSP5-8.5 scenario — representing a high-end physical risk trajectory — as an example, the Physical Value at Risk (PVaR) analysis indicates that the Group's existing production bases demonstrate notable climate resilience. Under the model-predicted conditions of increasingly frequent and intense extreme weather events, the production facilities may inevitably face certain operational disruptions and financial impacts. However, the overall magnitude of these effects remains within manageable limits, and does not pose a material threat to the Group's core operations or financial stability.

Identification, Impact Analysis, and Response of Physical Risks

Risk Type	Risk Factor	Risk Impact Pathway	Short-Term	Medium-Term	Long-Term	Operations & Value Chain	Potential Financial Implications	Response Measures
Acute	Extreme Heat Wave	This may lead to regional power supply constraints, resulting in production disruptions. Energy consumption of AC systems increases, the efficiency of cooling systems declines, and water consumption rises. Fire hazards in the environment surrounding the plant area increase. Extreme heat threatens the health and safety of employees working outdoors.	√	√	√	Own operations Upstream Downstream	Increase investment in backup uninterruptible power supplies, with higher electricity and water expenses and increased labor-related costs, adversely affecting revenue and profit stability.	Strengthen the deployment of backup power supplies in the plant area. Optimize chiller operations strategy, avoid continuous high-load operations, strengthen maintenance, and ensure efficient operations. Establish a reliable monitoring system to ensure the safe and continuous operation of production equipment. Optimize work arrangements during periods of high temperatures, shorten shift hours, and increase production personnel. Leshan GCL and other high-risk bases improved power outage contingency plans and strengthened summer electricity-saving measures.
	Typhoons/ Tropical Cyclone	Typhoons cause flooding of factories and equipment, resulting in asset damage and production interruptions. Rooftop photovoltaic installations at factories are damaged by typhoons. Supply chain disruptions delay the logistics of raw materials and products. Employee commuting is affected, and the safety of personnel performing outdoor operations was threatened.	√	√	√	Own operations Upstream Downstream	The operations and maintenance costs of factories and equipment increase, and losses are incurred in fixed assets such as photovoltaic installations, adversely affecting revenue and profit stability.	Based on the meteorological characteristics of each season, targeted inspections are carried out on the disaster resilience of operational facilities and production equipment. Develop emergency response plans and conduct regular drills.
	Flooding and Heavy Precipitation	Water ingress causes damage to factories and equipment and disrupts production. Obstructed logistics delay raw material supply or product delivery. Pressure on wastewater treatment increases.	√	√	√	Own operations Upstream Downstream	The operations and maintenance costs of factories and equipment increased, adversely affecting revenue and profit stability.	Apply waterproof sealing to production equipment to prevent seepage-related short circuits or structural corrosion. Install additional temporary water storage or emergency treatment equipment to prevent heavy rainfall from causing wastewater overflow and overloading treatment systems. Develop emergency response plans and conduct regular drills.
	Extreme Cold	Power facilities and the circulating water system freeze, resulting in equipment damage and production disruptions. Heating-related energy consumption increases. Road icing obstructs or delays logistics.	√	√	√	Own operations Upstream Downstream	Increased investment in backup uninterruptible power supplies, together with higher heating-related energy use and electricity expenses, adversely affects revenue and profit stability.	Strengthen the deployment of backup power supplies in plant areas. Establish a reliable monitoring system to ensure the safe and continuous operation of production equipment. Strengthen winter equipment upkeep and maintenance at all bases in Inner Mongolia and implement anti-freezing and anti-soaking measures. Adopt measures such as waste heat recovery to improve energy efficiency and reduce energy consumption.
Chronic risk	Water Scarcity	Water shortages reduce the capacity utilization rate and lead to a decline in production volume. Industrial water prices rise. Declining cooling system efficiency accelerates equipment wear and tear.	√	√	√	Own operations Upstream Downstream	Water expenses increase, production volume declines, and revenue falls.	Pursue water risk assessments and develop mitigation strategies. Develop water-saving equipment such as air-cooling technologies to reduce water usage. Strengthen wastewater reuse, reduce the proportion of water withdrawal from fresh water sources, and increase the rate of circular use of water resources.
	Sea Level Rise	Inundation of low-lying areas damages equipment.			√	Own operations	Factories and equipment in low-lying coastal areas are inundated, production bases are forced to relocate, and capital expenditures on infrastructure increase.	Select sites away from low-lying coastal areas, continuously track sea level rise trends, and develop dynamically adjusted response plans to reduce long-term risks.

Risk Management

Risk and Opportunity Management Process

GCL Technology has established a comprehensive climate risk and opportunity management process to conduct risk impact assessment and financial impact assessment of climate risks and opportunities, develop response strategies, and create a closed-loop management approach for the identification, assessment, and response strategies of climate risks.

Climate Risk and Opportunity Management Process

Identification of Climate Risks and Opportunities

- Based on *IFRS S2 Climate-related Disclosures* and macroeconomic, industry, and regulatory policies, the Group preliminarily identifies climate risks, including physical risks and transition risks, as well as opportunity types. At the same time, based on information gathered across the value chain and within the Group itself, it conducts interviews with stakeholders on climate-related topics to form this comprehensive list.

Risk Impact Assessment

- Risk impact assessment of physical risks: based on the geographical information of key links in the entire value chain of the business, the Group assesses the level of risk exposure and, in combination with management effectiveness, comprehensively determines the impact materiality of physical risks.
- Risk impact assessment of transition risks: by reviewing requirements from government departments, the stock exchange, and the capital market, investor/customer inquiries, and peer practices across five dimensions, as well as management effectiveness across the four dimensions of "Governance," "Strategy," "Risk and Opportunity Management," and "Metrics and Targets," the Group comprehensively evaluates impact materiality.

Financial Impact Assessment

- Through interviews with relevant internal departments and the collection of financial indicator data related to each risk, the Group sets financial materiality thresholds and forms assessments of the financial impact of climate risks and opportunities.

Dual Impact Assessment of Climate Risks

- Based on the above assessment results for impact materiality and financial materiality, the materiality rankings of each risk and opportunity are determined.

Strategy Development

- Based on the materiality rankings of each risk and opportunity, the Group analyzes the financial implications of taking or not taking responsive action and develops targeted response strategies.

The Group integrates climate risk monitoring into routine operations. For physical risks, a climate early warning mechanism is established alongside emergency risk management at each base to improve the forecasting of extreme weather conditions. For transition risks, ongoing efforts are made to track and analyze evolving transition policies and industry regulations both domestically and internationally, thereby facilitating timely decision-making.

Metrics and Targets

GCL Technology continues to advance greenhouse gas emission reductions by deploying intelligent energy monitoring systems, optimizing the energy structure, expanding the use of renewable energy, and building green factories, while also establishing scientific reduction targets to accelerate the green and low-carbon transition.

Emissions Overview

The Group's Scope 1 and Scope 2 GHG emissions mainly arise from the consumption of fossil fuels such as coal, gasoline, diesel, and natural gas, as well as the use of purchased electricity. In 2025, GCL Technology continued to advance greenhouse gas emission reductions by deploying intelligent energy monitoring systems, optimizing the efficiency of the industrial cooling system, and expanding distributed solar photovoltaic installations. At the same time, the Group actively builds green factories and deeply integrates environmental and low-carbon concepts throughout project life cycles, promoting carbon reduction and energy savings at the source and accelerating the Group's green and low-carbon transition.

GCL Technology's GHG Emissions of Polysilicon Segment and Wafer Segment in 2023-2025

Indicator	Unit	Polysilicon			Unit	Wafer		
		2025	2024	2023		2025	2024	2023
Scope 1 Emissions	tCO_2e	2,767,809	2,526,329	2,355,953	tCO_2e	3,674	7,284	14,108
Scope 2 Emissions	tCO_2e	2,498,232	2,549,025	2,674,477	tCO_2e	452,357	589,594	959,638
Total GHG Emissions (Scope 1 and 2)	tCO_2e	5,266,041	5,075,354	5,030,429	tCO_2e	456,030	596,878	973,746
Total GHG Emission Intensity (Scope 1 and 2)	tCO_2e / USD million revenue	76.04	81.40	40.74	tCO_2e / USD million revenue	32.37	24.81	11.81

GCL Technology has consistently been committed to strengthening systematic carbon management and continuously improving carbon emissions performance through ongoing operational optimization and technological innovation. The Group is actively formulating science-based carbon reduction targets, while tracking carbon intensity metrics by revenue and megawatt, comprehensively advancing measures for energy conservation and emissions reduction, and continuously enhancing its sustainable development performance. In the future, we will continue to deepen collaboration with industry partners and stakeholders to jointly promote the convergence and implementation of carbon performance evaluation standards, thereby helping drive the green and low-carbon transition.

GCL Technology's GHG Emissions in 2024-2025

Indicator	Unit	2025	2024
Scope 1 Emissions	tCO_2e	3,864,270	3,423,445
Scope 2 Emissions (location-based)	tCO_2e	5,207,241	5,208,754
Scope 2 Emissions (market-based)	tCO_2e	2,560,124	3,213,637
Total GHG Emissions (Scope 1 and 2, location-based)	tCO_2e	9,071,511	8,632,199
Total GHG Emissions (Scope 1 and 2, market-based)	tCO_2e	6,424,394	6,637,081
Total GHG Emission Intensity (Scope 1 and 2, location-based)	tCO_2e / USD million revenue	4,420.26	4,110.04
Total GHG Emission Intensity (Scope 1 and 2, market-based)	tCO_2e / USD million revenue	3,130.41	3,160.10

Scope 3 GHG Emissions of GCL Technology's Five Carbon Verification Bases in 2024-2025

Type	Unit	2025	2024
Total Scope 3 emissions	tCO_2e	5,818,270.34	5,689,867.45
Emissions from auxiliary material use	tCO_2e	1,698,283.89	1,874,372.40
Business travel	tCO_2e	1,253.34	814.99
Employee commuting	tCO_2e	4,213.18	4,762.53
Waste transport	tCO_2e	3,819.82	6,255.03
Product transport	tCO_2e	134,231.61	120,261.08
Raw material transport	tCO_2e	369,597.59	322,256.93
Emissions from raw material use	tCO_2e	3,604,527.03	3,357,863.67
Emissions from waste disposal	tCO_2e	2,343.88	3,280.82

Cross-Industry Climate Metrics

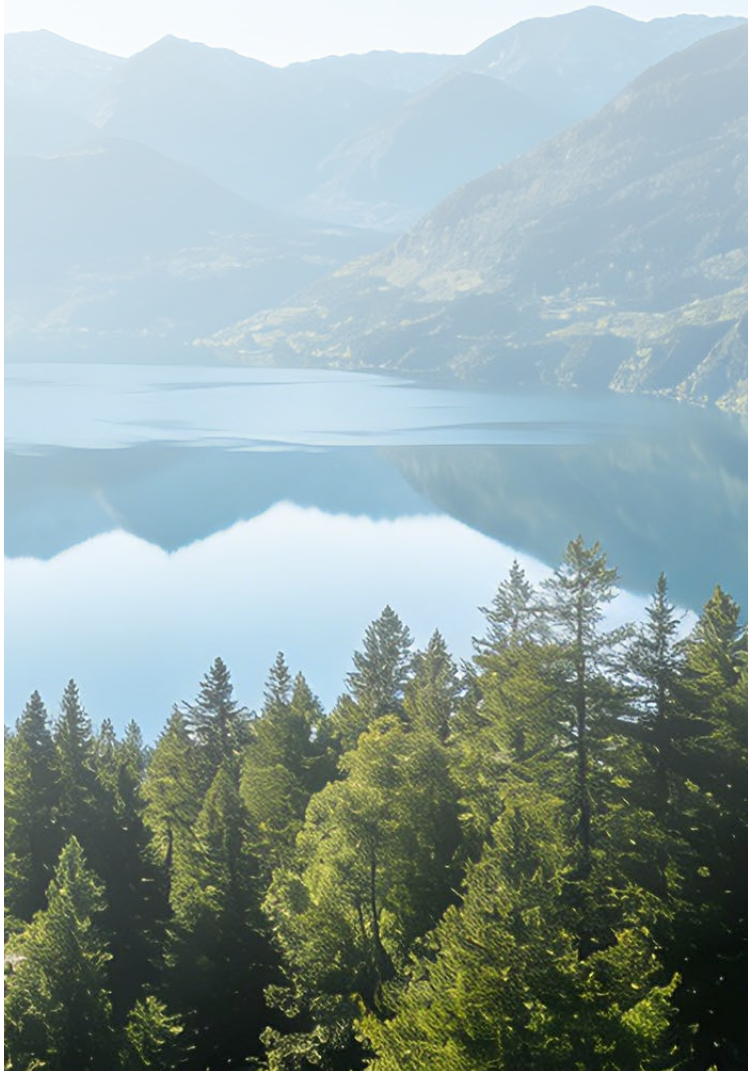
With reference to the HKEX *Implementation Guidance on Climate Disclosures* and *IFRS S2 Climate-related Disclosures*, GCL Technology has disclosed its climate performance metrics and strengthened the management of carbon emissions metrics to enhance the Group's climate metric performance.

IFRS Cross-Industry and Photovoltaic Industry Metrics

Topic	Indicator	Unit	2025
Physical risks	Share of assets at higher flood risk	%	9.89
	Geographical regions at higher risk of extreme heat waves	%	59.50
	Share of assets in areas with higher water stress	%	73.76
Share of products and revenue supporting the transition to a low-carbon economy	Polysilicon	%	68.31
	Wafer	%	13.90
Manufacturing process energy management	Total energy consumption	MWh	20,349,642
	Share of grid electricity	%	39.62[30]
	Share of renewable energy	%	56[31]
Manufacturing process water management	Total water withdrawal	ten thousand tonnes	582.81
	Total water usage	ten thousand tonnes	2,672.57
	Share of assets in areas with high baseline water stress	%	59.50
	Share of assets in areas with extremely high baseline water stress	%	14.26

Climate Goals and Performance

To actively address the challenges of climate change, the Group has refined its short-, medium-, and long-term GHG emissions targets, established a phased emissions reduction pathway, and continued to advance its green and low-carbon transition. For the group's climate targets, specific carbon reduction pathway planning, and related measures, please refer to the Climate Change Strategy section.



[30] The share of grid electricity is calculated as: (Purchased electricity + Renewable energy consumption) ÷ Total energy consumption. Renewable energy consumption amounted to 4,512,836.04 MWh, and purchased electricity amounted to 3,549,571.67 MWh.

[31] The share of renewable energy is calculated as: Renewable energy consumption ÷ (Purchased electricity + Renewable energy consumption). Renewable energy consumption amounted to 4,512,836.04 MWh, and purchased electricity amounted to 3,549,571.67 MWh.

03

Talent Infinity

Talent Attraction and Retention | Talent Development | Diversity and Inclusion | Health and Safety

SDG Goals Addressed in This Chapter

GCL Technology firmly believes that every employee has unlimited potential and creativity. Rooted in the "One GCL" values, the Group is committed to fostering a people-oriented, diverse and inclusive workplace environment, cultivating a workplace atmosphere of sustainable development, health, and safety, and building platforms for employee training and cultivation, with "Talent Infinity" creating sustainable momentum for the Group's business development.

T A L E N T I N F I N I T Y

Talent Attraction and Retention

GCL Technology integrates its talent strategy into the Group's growth blueprint and continuously enhances its capability for talent attraction and retention through a systematic and institutionalized talent management system. The Group empowers employee development and continuously strengthens employees' sense of belonging through a scientific compensation and performance system, career progression pathways, and comprehensive benefits, providing strong support for the coordinated development of employees and the enterprise.

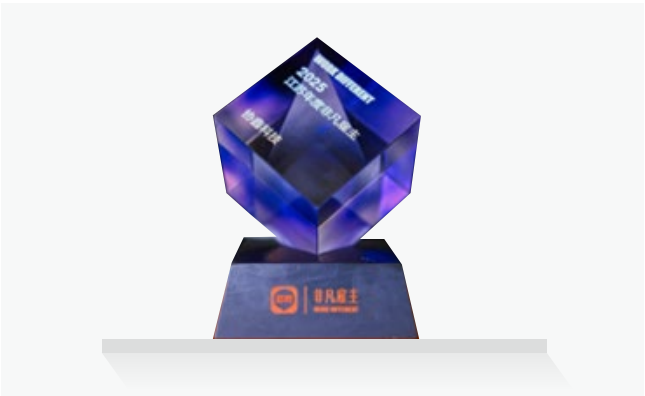
Talent Recruitment

GCL Technology strictly complies with the *Labor Law of the People's Republic of China*, the *Labor Contract Law of the People's Republic of China*, and other applicable laws and regulations. The group has established and continuously refines policies including the *Recruitment Management System* and the *Human Resources Strategic Planning Management System* to set out detailed requirements for the recruitment and employment processes.

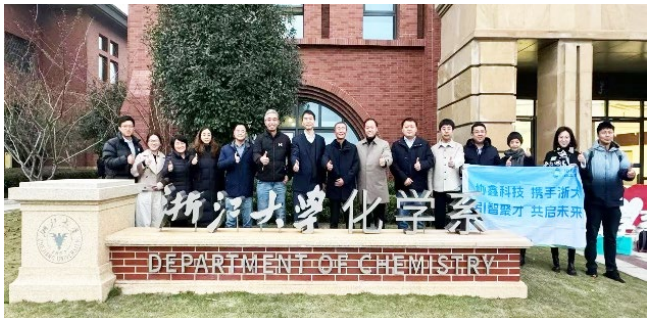
The Group has established and continues to improve a formal talent pipeline development strategy. Guided by the talent development philosophy of being people-oriented, strategically focused, tiered and categorized, and practice-based, it has refined succession safeguards for critical positions, fueling its technological innovation and global expansion with a high-quality talent team, and underpinned its medium- to long-term business development. Each year, aligned with its strategic planning, the pace of ramp-up at production bases and capacity expansion, iterations of key processes and equipment, and the layout of international markets and supply chain, the Group conducts annual and rolling workforce demand forecasts and role competency profiling, identifies critical positions and scarce skills, and formulates tiered and categorized recruitment and reserve plans accordingly, creating closed-loop management covering "demand forecasting - talent acquisition - cultivation and development - retention and talent pipeline development."

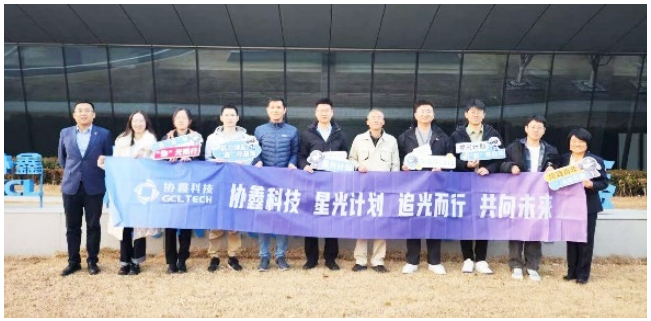
In terms of talent acquisition, this year the Group focused on two key directions: supplementing R&D talent and building a reserve of high-end international talent. Through campus recruitment and project-based talent recruitment, recruitment through specialized talent markets and industry networks, and targeted hiring for key disciplines and critical positions, the Group recruited a total of 714 employees during the year. The Group actively established deep cooperative relationships with universities, reaching school-enterprise partnerships with more than 20 institutions and establishing the GCL Technology PV Industry College with Baotou Vocational and Technical College to systematically cultivate and attract outstanding talent and precisely match the development needs of its talent strategy. In addition, the Group joined the National Smart Chemical Industry-Education Integration Consortium and, together with universities, held technical exchange seminars, the Group has attracted open days, and other activities. As of the end of the reporting period, attracting more than 550 graduates from partner universities to join. In 2025, our recruitment and employment practices received awards including "2025 Jiangsu Annual Extraordinary Employer," "2025 Best Employer in the City," and "Outstanding Employer."

Among these, the Global Graduate Traineeship Program and the R&D PhD Hiring Program, as the Group's programs for attracting and cultivating highly educated talent, carried out targeted recruitment and development for critical positions. During the year, five doctoral graduates from well-known universities were recruited and incorporated into the Group's talent development and talent pipeline for critical positions, forming a sustainable talent supply and succession capability.



GCL Technology Recruitment Awards





GCL Technology 2025 University-Enterprise Cooperation Activities

GCL Technology encourages internal mobility among employees and revised the *Internal Recruitment and Mobility Policy* to support overseas market and emerging business strategies through talent mobility, while also stimulating organizational potential and promoting the exchange of knowledge and experience. In 2025, the Group launched the "Flowing Water Plan," with internal candidates accounting for 3.4% of recruited employees, an increase of 2.3% over the previous year, which has been driven forward by deeper alignment between employee cultivation and the Group's strategy. As of the end of the reporting period, the Group had a total workforce of 8,253, including 8,120 permanent employees and 133 non-permanent employees.

GCL Technology "Flowing Water Plan" Platform

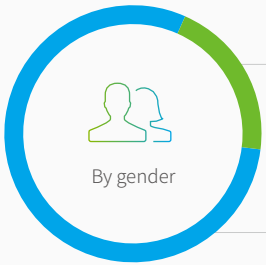
As of the end of the reporting period

Total number of employees	Permanent employees	Non-permanent employees
8,253	8,120	133

Performance of the "Flowing Water Plan" in 2025

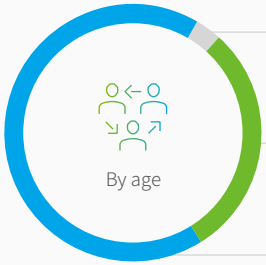
Internal candidates accounted for	A year-over-year increase of
3.4%	2.3%

GCL Technology 2025 Permanent Employee Performance (Unit: persons)

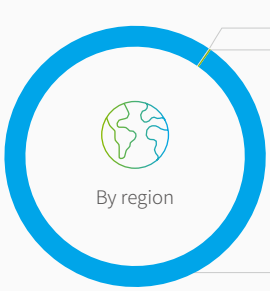


1,649
6,471
Male
Female

60
367
7,693
Senior management
Middle management
Frontline employees



260
2,402
5,458
30 and below
31-50
Above 50



6
28
8,086
Mainland China
Hong Kong, Macao, and Taiwan of China
Overseas

Talent Retention

GCL Technology is committed to building a scientific and well-structured remuneration framework, fair performance evaluation methods, and diversified incentive measures, while continuously enabling employees to feel valued through a better work environment and aligned management systems, so as to attract and retain more outstanding talent with shared aspirations.

Remuneration

GCL Technology has revised the *Remuneration Management System*, established a sound remuneration strategy, and developed a competitive incentive mechanism. The Group upholds the principle of role-based grading, competency-based hiring, and performance-based rewards, and has established a fair, performance-oriented compensation structure with differentiated fixed-to-variable pay ratios for different job sequences. The Group strictly adheres to the principle of equal pay for equal work, ensuring that male and female employees in the same positions and at the same grades receive equal remuneration, and conducts periodic remuneration reviews to ensure that pay levels are not affected by gender or other factors unrelated to work.

In addition, to encourage co-creation and value sharing, GCL Technology continues to refine its long-term incentive programs and has established an equity incentive plan. The Group's employee equity plan is reviewed and approved by the Board (and/or the Remuneration Committee) and is open to eligible employees, covering a diverse range of roles including management personnel, key technical personnel, and employees in key operational roles, so as to strengthen the attraction, motivation, and retention of core talent. In 2025, the Group granted 271.73 million shares to 40 employees, including management personnel and core operations personnel. In 2024, the Group implemented an employee stock purchase plan covering 85 employees, with subscriptions exceeding 10 million shares. By continuously advancing employee equity participation, the Group further enhanced organizational cohesion and long-term competitiveness.

In 2025

The Group granted

271.73 million shares

to 40 employees, including management personnel and core operations personnel

Performance Appraisals

GCL Technology has revised the *Employee Performance Appraisal Management System* and established a closed-loop performance management framework covering all permanent employees, encompassing key links such as target setting, process tracking, regular evaluation, feedback and improvement, and performance appeal procedures, ensuring that performance evaluation and feedback mechanisms are standardized, traceable, open, and transparent, and fully stimulating organizational effectiveness. In 2025, the Group launched the GCL Performance System, standardizing the rating criteria for performance appraisals while effectively ensuring full, open and transparent coverage of performance evaluation.

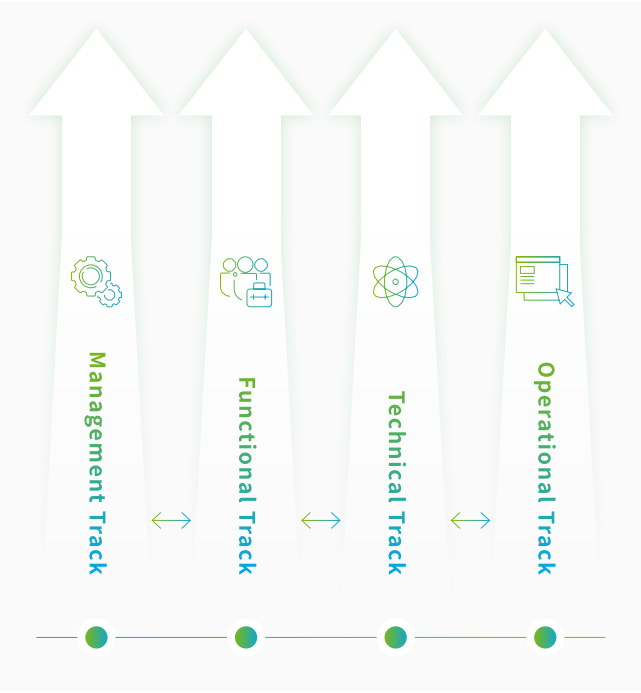
GCL Technology Performance Appraisals and Feedback Processes

Target Setting	Employees and managers jointly formulate work targets and, through a multi-dimensional evaluation approach to integrate individual targets with team responsibilities.
Evaluation Cycle	Evaluation cycles are adopted on a monthly, quarterly, and annual basis to periodically track employees' progress against their targets.
Performance Evaluations	Employees being evaluated may receive feedback from different levels, including managers and collaborators.
Feedback and Improvement	The Group conducts comprehensive one-on-one performance discussions and coaching. For employees who do not meet expected performance standards, these discussions facilitate gap analysis and challenge identification, leading to the implementation of performance improvement plans.
Performance Appeal	The Group attaches importance to the openness and transparency of performance results, clarifies appeal procedures, and establishes agile dialogue mechanisms to ensure comprehensive and equitable performance evaluations.

Employee Promotion

GCL Technology has established clear career development paths for all employees and revised internal policies including the *Employee Promotion and Demotion Management System* and the *Technical Competence Assessment and Application Policy*, providing all employees with equal opportunities for career development and promotion based on objective performance evaluations. The Group has established four promotion pathways across the management, functional, technical, and operational tracks, and conducts capability grade evaluations according to each employee's track, with the evaluation results directly tied to promotion and compensation adjustments. Through diversified programs, the Group supports employees in pursuing lateral transitions or vertical development, helping every employee achieve development targets and fostering mutual empowerment for both employees and the Group.

GCL Technology Track Promotion Pathways



Talent Retention

GCL Technology adheres to the people-oriented philosophy and continues to retain talent through diversified talent development programs and excellent employee benefits, ensuring a healthy talent mobility rate and promoting the Group's sustained and stable development. The Group has adopted a series of measures to help young employees quickly adapt to the workplace, clarify future career plans, and strengthen their sense of belonging and engagement with the Group. At the same time, GCL Technology places emphasis on fostering the corporate culture and has launched the "New Starting Point, Shared GCL Circle" cultural integration program. Through in-depth culture promotion, the Group communicates its core values and development vision and promotes efficient team collaboration; through vivid site visits and interviews, it breaks down communication barriers and enhances employees' emotional connection. GCL Technology has developed a replicable new model for cultural integration, ensuring rapid cultural identification at new bases and newly acquired enterprises, infusing newly established bases with GCL DNA, and leading employees to appreciate the profound essence of the Group culture.

In 2025, the Group's voluntary turnover rate of employees was 11.44%. In the future, GCL Technology will continue to advance talent retention and development measures to retain outstanding employees and grow together with the Group.

GCL Technology 2025 Employee Turnover Performance

Indicator		Unit	Data in 2025
Overall turnover rate		%	11.44
By gender	Male	%	11.88
	Female	%	9.70
By age	30 and below	%	19.15
	31-50	%	8.10
	Above 50	%	10.67
By region	Mainland China	%	11.49
	Hong Kong, Macao, and Taiwan regions of China	%	0
	Overseas	%	0

"New Starting Point, Shared GCL Circle" Cultural Integration Program

From May to July 2025, GCL Technology carried out the "New Starting Point, Shared GCL Circle" cultural integration program for newly established bases. By revisiting the Group's 35-year development history, it brought the Group's cultural spirit deep into the front line. Meanwhile, the Group organized and conducted a survey on the degree of corporate culture integration. By holding more than 18 exchange sessions for frontline employees, it answered questions on site and addressed employee concerns, provided suggestions for corporate culture integration, and continuously enhanced organizational cohesion and unity.

GCL Technology Frontline Cultural Outreach Program

Employee Well-Being

GCL Technology cares for every employee and has formulated and revised *the Employee Benefits Management Policy* to provide 100% of all employees, including permanent , part-time, and contract employees, with benefits coverage beyond remuneration.

GCL Technology Employee Benefits System

Compensation and Benefits — **All employees**

- Social insurance and housing provident fund are paid in accordance with the law, including pension insurance, medical insurance, unemployment insurance, work-related injury insurance, and maternity insurance, to safeguard employees' basic social protection rights and interests.
- Employees are provided with various subsidies and care benefits, including meal allowances, transportation/commuting allowances, housing allowances, holiday bonuses, birthday and wedding gifts, and business travel/on-site assignment allowances, to enhance employees' sense of well-being and financial security.

Non-pay Benefits — **All employees**[32]

- Employees' rights to paid leave and other statutory holidays are protected in accordance with the laws and regulations. Maternity leave and nursing/breastfeeding arrangements for female employees are implemented in compliance with national and local requirements.
- Paid childcare-related leave, including paternity leave and parental leave, is provided in accordance with applicable laws and regulations.
- Supplemental commercial insurance, such as accident insurance and critical illness insurance, as well as annual health check-ups and other health benefits, are provided to employees to improve their level of medical support and health management capabilities.
- Targeted health protection and occupational health support, including occupational health examinations and personal protective equipment, are provided for special roles or high-risk operational positions.
- For personnel working across regions, stationed overseas, or in critical positions, necessary living support and subsidies are provided in accordance with the policies and procedures.
- Regular team-building activities are organized to enhance team cohesion.
- The Group prioritizes employees' physical and mental well-being by providing psychological support and counseling services.

The Group organizes a wide variety of employee activities to enrich employees' work-life balance and convey the corporate values of "One GCL" through concrete actions.

Earth Day "Flea Market" Event


National Day Garden Party Event


Young Employee Team-Building Event

International Women's Day Sand Art Event

[32] Given the extremely low proportion of part-time labor contract personnel in the Group's total workforce, this section uses "all employees" as a unified term to facilitate the overall description of employee benefits coverage. All compensation and non-compensation benefits provided by the Group fully cover all permanent employees and, where applicable, relevant part-time employees.

Talent Development

GCL Technology positions employee cultivation and development as an important component of its "Talent Infinity" strategy. The Group has established the "GCL 5 Journey" skills and knowledge development training system, integrating internal and external learning resources to provide personalized growth plans for employees across different levels and functions. Combined with a well-established talent pipeline system, this system ensures comprehensive coverage from capability enhancement for all employees to structured talent development.

Talent Cultivation

GCL Technology continues to strengthen its talent pipeline development and build a comprehensive talent development mechanism. The Group focuses on three key segments: young talent, core middle management, and the senior leadership pipeline. By integrating talent attraction and development and maintaining a dynamic and continuous pipeline system, it establishes a sustainable talent pipeline that supports long-term business growth.

Young Talent Pool	• The Group conducts forward-looking talent strategy planning aligned with its corporate strategy, advancing talent development, talent pool building as well as attraction and retention. • For new employees such as graduate management trainees, the Group has formulated a four-stage development plan covering integration and foundations, professional deepening, management reserve development, and comprehensive output, thereby fully tapping talent potential, helping new employees quickly become familiar with the business and build a foundation in leadership, while aligning with the Group's development strategy and incorporating an international perspective and capabilities. • The Group has comprehensively implemented its apprenticeship program, assigning mentors to each new employee, and formulating training programs. In 2025, a total of 212 new or reassigned employees joined the program and received systematic training sessions on job skills. The Group has clearly stipulated the cultivation period and the graduation requirements for passing assessments and obtaining job qualification certificates. Throughout the year, the Group carried out mentor-apprentice activities for a cumulative 18,165 person-days and granted incentives to all qualified mentors and apprentices, thereby further strengthening its talent pipeline.
Middle Management Reserve	• The Group conducts follow-up evaluations of talent development, regularly carry out talent reviews, and select talent with strong performance, high potential, and proven integrity from various tracks for inclusion in the talent reserve pool. In 2025, 30 young employees were selected through open competition and other methods for the "Outstanding Young Talent" program. The program includes training modules on general competencies and strategic awareness, professional development and functional integration, as well as management and leadership capability development. Cross-functional job rotations are also arranged to cultivate the Group's business and technology leaders and clarify talent development pathways through closed-loop management, thereby ensuring seamless succession and promotion channels.
Senior Leadership Reserve	• The Group has established the "GCL Voyage" program to build a senior leadership pipeline with capabilities in strategic insight, market acumen, business expertise, and management proficiency. During the year, it covered 35 pipeline employees and completed targeted training programs. The Group conducted annual talent reserve assessments, reviewing the number of employees in position and in reserve for critical positions, broadening talent development pathways and continuously supplying talent to the management team.
Leadership	• Through training, the Group comprehensively enhances the leadership capabilities, strategic thinking, and execution capabilities of managers at all levels. It also supports managers in pursuing external MBA degrees, fully empowering employee growth and development.

Talent Development

GCL Technology continuously optimizes its talent development system and has established internal policies, including the *Training Management Policy*, the *Internal Lecturer Management Policy*, and the *Mentor-Apprentice Management Standard* to define the training management framework, course development standards, structured and tiered development pathways, and evaluation requirements. It also implements a teaching model with integrated internal and external professional instructors, and builds long-term cooperation mechanisms with universities and professional providers. The Group has established the skills and knowledge development training system, around dimensions including strategy execution, corporate culture, knowledge sharing, and capability enhancement. It provides all employees, including part-time and contractors, with systematic, tiered, and traceable training programs for skills and knowledge development, encouraging employees to leverage their strengths and enhance their career development potential.

GCL Technology "GCL 5 Journey" Skills and Knowledge Development Training System

	GCL Leadership Program	GCL Voyage program	GCL Safeguard Program	GCL Navigator Program	GCL Launch Program
Target employees	Middle and senior management and key professionals	Newly appointed managers and leadership pipeline talents	Mid-level managers and key professionals	Frontline technicians	New hires (campus & experienced)
Core Curriculum	PV industry Trend Updates Quality Trend Updates Chemical Trend Updates AI Trend Updates	AI Mindset and AI-Driven Leadership Middle-to-Senior Leadership Development Program Leadership Innovation Program Digital Mindset Program for Managers	Excellent Instructors And Excellent Courses Training Program Management Foundation Program Intermediate QA Bootcamp Intellectual Property Bootcamp	AI Empowerment Foundation Bootcamp And Innovation Workshop Primary Quality Training Camp R&D Training Camp	Campus Hire Training Program New Hire Orientation Program
Training Approach	Through frontier industry-focused course content such as the Chemical Industry Lecture hall and AI lecture Hall, supplemented by practical applications and value exploration across various scenarios, leaders' transformation-oriented thinking and skills are comprehensively enhanced to respond to the rapidly changing market.	This program supports newly appointed managers in building collaborative and efficient teams, promoting continuous improvement, and cultivating a talent pipeline characterized by professionalism, youth, and global perspectives.	Focusing on the dual priorities of leadership and business skill development, the Group provides core talent with management theory, cross-department collaboration, and production technology training, while continuously strengthening the project management capabilities of the Group's mid-level managers.	Through courses such as *AI Capability Map and Technical Tools*, internal and external experts provide frontline technicians with theoretical learning and project coaching, continuously enhancing their professional knowledge and skills.	For new hires from both campus and social recruitment channels, intensive training camps, business training, and orientation proprograms are provided to help new employees understand the corporate culture and quickly adapt to the workplace.
Evaluation Methods	Online Examination	Program Completion Report	531 Action Plan	Project proposals and implementation progress, such as A3 reports	Online Examination

The Group provides all employees with opportunities for professional skills development to enhance job competency. Through the online learning platform, offline courses, and other channels, the Group delivers courses covering in-depth learning in professional technology and business capability enhancement, helping employees progress toward becoming senior professionals. Additionally, job-specific training is provided for designated positions. In 2025, the Group launched courses such as "Risk Identification and Control" and "AI-Empowered Business Scenarios and Manufacturing Case Studies" on the online learning platform, and invited external experts to deliver courses. As of the end of the reporting period, total course participation reached 12,565 attendances, with cumulative training hours of 12,658.8 hours, reflecting a significant increase in the training participation rate. In 2025, a total of 8,235 employees participated in training, achieving 100% coverage. Annual training investment amounted to RMB 4.1315 million, with total training hours for all employees reaching 442,073 hours and an average of 53.57 training hours per employee.

GCL Technology's 2025 Training Performance

In 2025

Number of training participants
8,253

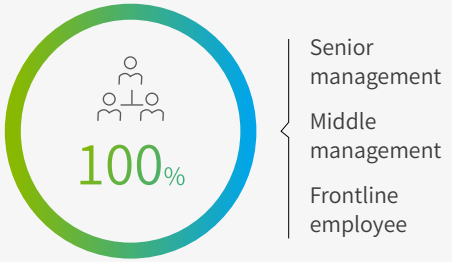
With a coverage rate of
100%

Annual training investment
RMB 4.1315 million

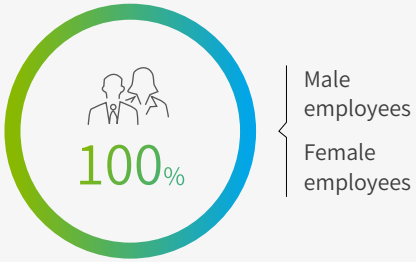
Total training hours for all employees
442,073 hours

Training hours per employee
53.57 hours

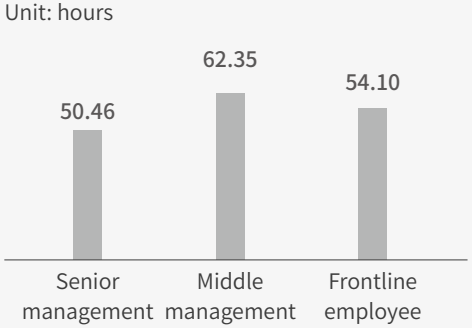
Training Coverage by Job Level



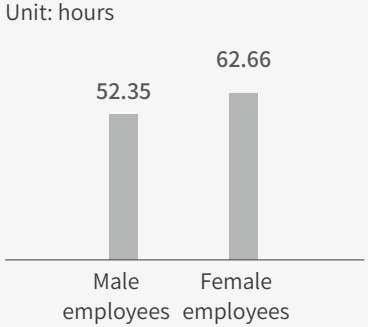
Training Coverage by Gender



Average Training Hours by Job Level



Average Training Hours by Gender



GCL Technology encourages all employees including part-time and permanent employees to obtain professional qualifications, and provides financial assistance for degree advancement. The Group actively collaborates with educational institutions and universities to provide employees with external learning opportunities. The Group has launched a joint education program with Jiangsu University, under which 25 employees graduated in 2025, and a joint training program with Zhongwei Senior Technical School for advanced technical professionals, under which 8 employees are expected to graduate in 2026. Employees actively participated in professional qualification training and obtained relevant certificates. During the year, 47 employees obtained DSS+ Internal Trainer certification, 43 employees obtained HAZOP Analyst Certification, 20 employees obtained Quality Management System Internal Auditor certification, and 23 employees obtained safety and business-related professional certifications. In addition, the Group actively stimulates employee potential and creativity by organizing various competitions and innovation awards.

Our employees actively participated in professional qualification training and obtained relevant certificates. During the year,

47 employees obtained DSS+ Internal Trainer certification

43 employees obtained HAZOP Analyst Certification

20 employees obtained Quality Management System Internal Auditor certification

23 employees employees obtained safety and business-related professional certifications

"GCL Future" AI-Empowered Innovation Application Competition

From August to December 2025, the Group focused on the practical objective of "Bringing AI from the Classroom to the Factory" and achieved AI empowerment through an Individual Creativity Competition and a Team Practical Competition. The competition hosted innovation workshops and invited experts to provide on-site guidance for the implementation of AI projects, creating more than 10 AI outcomes across key fields such as workplace safety, process optimization, and intelligent inspection. Winners of the team competition received the training certificate for "Artificial Intelligence Application and Innovation Capability Enhancement" issued by the Talent Exchange Center of the Ministry of Industry and Information Technology, guiding direction for the Group's comprehensive AI strategy.

Diversity and Inclusion

GCL Technology attaches great importance to diversity and human rights protection, regarding respect for human rights as a cornerstone and ethical guide for business operations. The Group has established a sound governance structure whereby the Board is responsible for human rights risks and diversity, equity, and inclusion (DEI) management matters, the Sustainability Management Committee authorizes the Sustainable Development Center to carry out specific management work, and all subsidiaries have established ESG task forces to supervise and manage compliance with human rights standards and to carry out their respective human rights risk management work and the implementation of diversity initiatives.

Human Rights Protection

In accordance with the *UN Guiding Principles on Business and Human Rights (UNGPs)*, the *Universal Declaration of Human Rights*, and the International Labour Organization (ILO) core conventions and rules, GCL Technology has formulated policies including the *Code of Business Conduct*, the *Human Rights Policy*, the *Employee Rights Protection Policy*, the *Anti-Forced Labor Management Procedure*, and the *Anti-Discrimination Management Procedure*. These policies covers all subsidiaries and joint ventures of the Group, and the Group promotes compliance among its suppliers and partners. During the year, GCL Technology did not identify any human rights violations involving child labor or forced labor.

GCL Technology's Human Rights Risk Management Framework

Commitment to Human Rights

- The Group respects and protects human rights, and adopts a zero-tolerance approach toward discrimination, any form of harassment, invasion of employee privacy, and other acts that infringe upon human rights.
- The Group ensures employees have decent working conditions and social protection, ensures strict compliance with laws and regulations regarding working hours, employee compensation and benefits, and leave entitlements. The Group has formulated the *Employee Attendance and Leave Management System* to safeguard employees' right to paid annual leave, stipulate working time limits in the procedures, and avoid excessively long working hours.
- The Group strictly prohibits child labor, forced labor, and other such practices, and safeguards employees' rights to equal pay for equal work and freedom of association.

Human Rights Due Diligence

- All subsidiaries are required to gradually establish processes to identify and manage human rights risks, and incorporate human rights assessment into the risk assessment process;
- The Group actively conducts human rights due diligence and conduct regular inspections to determine whether there are any human rights infringements within its operations and value chains, including child labor, forced labor, discrimination, and violations of freedom of association and collective bargaining, to prevent and address the impacts of potential human rights risks.

Mitigation & Remediation

- Comprehensive human rights risk prevention measures have been established across all business processes, including recruitment, employment, separation, and well-developed human rights grievance procedures and a labor dispute mediation committee to handle various disputes;
- The Group provides education and training sessions to enhance legal awareness, establishes joint prevention and Disciplinary mechanisms for the prevention and punishment of workplace harassment, enhances employees' awareness of human rights protection, and fosters a fair employment environment.

Employment Diversity

GCL Technology has formulated the *Diversity, Equity, and Inclusion (DEI) Policy* and has fully implemented it across recruitment and selection, employee compensation and benefits, training and development, promotion, and other areas to build a diverse workforce. The Group has established transparent diversity targets covering all employees and provides DEI training to all employees. Relevant diversity measures cover all operating bases, embedding a culture of equity and inclusion among all employees. The ESG Committee is responsible for overseeing the effectiveness of the Diversity, Equity, and Inclusion (DEI) Policy.

The Group places great importance on protecting the rights and interests of vulnerable groups and has formulated the *Special Protection Procedures for Child Labor, Underage Workers, and Female Employees*. It has set up nursing rooms and childcare facilities in office areas, exempts breastfeeding employees from night shifts, and provides a one-hour breastfeeding break each day. It also regularly provides special health check-ups and "two-cancer" (breast and cervical) screenings for female employees and organizes group activities for female employees to comprehensively protect female employees' rights and interests.

Targets

By 2026, increase the proportion of female employees to

22%

By 2026，increase the proportion of female senior management to

18%

2025 Target Progress

The proportion of female employees reached

20.31%

The proportion of female senior management reached

15.25%

GCL Technology's Employment Diversity in 2025

Female Employees in Management

15.55%

Female Employees in Junior Management

19.35%

Female Employees in Middle and Senior Management

16.39%

Female Employees in STEM Departments

15.55%

Female Employees in Revenue-Generating Departments

36.67%

The Group provides equal employment opportunities and benefits for employees with disabilities and has installed accessible elevators, ramps, and other facilities to ensure employee safety and convenience.

During the reporting period, the Group recruited

7 employees with disabilities

Employed a total of

30 employees with disabilities

The Group respects the living habits of ethnic minority employees and creates a comfortable work environment for them by providing halal meal options in its cafeterias and through other measures.

During the reporting period, ethnic minority employees accounted for

4.32%

Employee Communication

GCL Technology has established smooth employee communication mechanisms and a feedback system to continuously optimize the employee experience. The Group respects employees' right to freedom of association and has established democratic management frameworks such as the *Statutes of Union at GCL Technology* to encourage employees to actively participate in corporate management. During the reporting period, the Group convened the Employee Representative Assembly, at which votes were held on revisions to management policies related to human resources, safety and environmental protection, as well as the election of union committee members. Updates were provided on the implementation of employee proposals from the previous year, and more than 6 employee proposals were reviewed and approved, with material rewards granted to the proposers. At the assembly, the Group signed agreements including the *Collective Contract*, the *Collective Contract for the Protection of Female Employees' Rights and Interests*, and the *Collective Wage Bargaining Contract*, achieving **100%** signing coverage to ensure the protection of employee rights and interests.

The Group regularly conducts satisfaction surveys for employees on an annual basis for five consecutive years, with questionnaires covering seven key dimensions, including job positions and performance, work environment and benefits, culture and atmosphere, and management and communication, as well as specific areas such as physical and mental health, labor protection, and training value. The Group implements follow-up with improvement measures based on the survey results. In 2025, the employee participation rate for the Group's satisfaction survey reached **91.3%**, and the employee satisfaction score was **86** (out of 100), indicating a relatively high level, with outstanding performance in areas such as safety culture and team collaboration. Going forward, the Group will implement targeted improvements through measures such as refining training plans and will continue to track the implementation of these measures through quarterly forums and digital platforms, gradually improving the issue resolution rate.

The Group has established a formal and confidential grievance reporting and handling mechanism for employees. Through online and offline dual-track communication channels, including employee suggestion platforms and face-to-face communication, employee concerns are ensured to be transmitted promptly. A closed-loop feedback process is implemented, featuring timely responses and follow-ups on case progress and resolutions, thereby continuously enhancing organizational transparency and employee engagement.

Communication Channels and Achievements

Suggestion Collection

- Continuously collect employee opinions through channels such as employee suggestion boxes, human resources email, employee hotlines, and the Employee Representative Assembly.
- During the year, **over 900** employee suggestions were collected, covering issues of concern to employees such as the organization of cultural and sports activities and the management of dormitories, cafeterias, and shuttle buses, with an issue resolution rate of over **95%**.

Communication and Dialogue

- Communication channels such as General Manager open days and employee forums are organized quarterly to understand issues raised in employee feedback through on-site face-to-face discussions, provide responses on site, and follow up on subsequent improvements.
- During the year, **24 forums** were held, and a total of **79** employee suggestions were collected for discussion and exchange at the forums, with all related issues having been fully addressed.

Complaints and Reporting

- The *Employee Complaints Policy* has been formulated, and public General Manager mailboxes and public reporting channels (email and hotline) have been established to receive both anonymous and non-anonymous complaints and reports from employees.
- All reports are subject to strict confidentiality, and no organization or individual may engage in retaliation or discrimination against whistleblowers.

The Group Convened the Employee Representative Assembly


Employee Forums

Health and Safety

GCL Technology strictly complies with laws and regulations including the *Law of the People's Republic of China on Work Safety* and the *Law of the People's Republic of China on Prevention and Control of Occupational Diseases*. Regarding safety management as a cornerstone of corporate sustainable development, the Group has established a series of safety standard polices including the *Safe Production Management System*, the *Occupational Health Management System*, and the *Contractor Evaluation and Management System*, and revised policies such as the *EHS Accident and Incident Management Regulations* and the *Safety Management Procedure for Special Operations* during the year to clarify the detailed classification standards and management measures for safety accidents and safeguard the health and safety of all employees and contractors.

Health and Safety Management System

GCL Technology has established and continuously improved its safety management framework by setting up the EHS Management Committee at the governance level, which is responsible for safety management principles, targets, and work plans, and for supervising the implementation of rules and procedures. At the management level, the EHS Office is responsible for implementing the Group's EHS principles, the policies, standards, and regulations, and for promptly researching and evaluating the Group's EHS work. During the reporting period, the Group further strengthened safety leadership, promoted the integration of safety work into actual business operations, and achieved integrated production safety. During the reporting period, the Group formulated the *Safety Duty Performance Checklist for Persons in Charge* to strengthen accountability in performing duty performance. Additionally, Joint CEOs and responsible persons of subsidiary bases signed the *EHS Target Responsibility Statement* to advance the implementation of a responsibility assessment mechanism for work safety for all employees.

As of the end of the reporting period, GCL Technology's 12 stably operating production bases that were eligible for certification had been audited and found to comply with the requirements of the ISO 45001 Occupational Health and Safety Management System and obtained the corresponding certification, achieving 100% certification coverage. Five companies including GCL Technology Management Center, Xuzhou Photovoltaic, Ningxia Photovoltaic, Jiangsu Zhongneng, and Leshan GCL—obtained SA8000 Social Accountability Standard certification.

GCL Technology's Safe Production Targets

Targets

Lost time injury frequency rate per 200,000 hours (including employees and contractors) **<1.5**	**Achieved**
Safety hazard rectification rate **100%**	
Closure rate for corrective actions on all accidents and incidents **100%**	
Compliance rate in occupational hazard inspection **100%**	

During the year

The Group's management center carried out a total of

40

safety inspection and research activities,

Identified

1,518 hazards

Achieved a hazard rectification rate of

100%

Safe Production

GCL Technology has established a full lifecycle safety control mechanism covering risk identification, assessment, and control, systematically enhancing safety management effectiveness. During the reporting period, the Group optimized the dual prevention system for graded safety risk control and hazard inspections and governance, promoting a shift from "managing hazards and accidents" to "managing risks." Employees fully mastered methods for identifying safety risks, and concise and practical emergency response cards were developed to reduce safety risks.

The Group enhances safe production through digital transformation by establishing a safety management information system that incorporates systems including the task and target platform, change management, special operations control, intelligent inspections, and safety scoring, enabling remote, intelligent, and targeted safety management and enhancing intrinsic safety.

In addition, the Group attaches great importance to contractor management by incorporating contractors into the Group's unified safety management system, formulating policies such as the *Contractor Evaluation and Management System* and the *Safe and Civilized Construction Management System*, and conducting stringent safety reviews for contractor onboarding. Contractors are required to sign safety responsibility statements in full, and the safety performance of project managers in fulfilling their duties is assessed. The Group has prepared the *Project Safety Assessment Guidelines* as an appendix to project contracts and conducts process-based inspection, requires special operations personnel to hold mandatory certifications, and strengthens supervision and management of on-site operations to ensure controllable risks throughout the entire process.

Occupational Health

GCL Technology implements systematic occupational health management to safeguard the occupational health and safety of employees, with the scope of management covering all employees and contractors. The Group strengthens control over potential hazard factors, conducts screening activities for occupational health contraindications, and ensures the distribution of personal protective equipment (PPE). In 2025, annual PPE investment amounted to RMB 18.7055 million. In addition, we provides occupational health check-ups for all employees exposed to occupational hazards. No suspected or confirmed occupational disease cases were identified during the year.

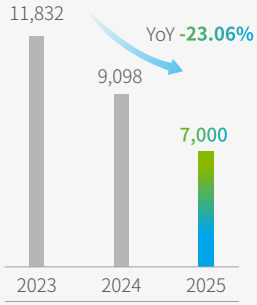
GCL Technology's 2025 Health and Safety Performance

Employee fatalities over the past three years
0

Number of employee injury incidents
37

Employee lost time injury frequency rate per 200,000 hours
0.46

Hours lost due to employee injuries



Contractor fatalities
0

Number of contractor injury incidents
0

Hours lost due to contractor injuries
0

Contractor lost time injury frequency rate per 200,000 hours
0

In 2025

Annual PPE investment amounted to
RMB 18.7055 million

we provided occupational health check-ups for all employees exposed to occupational hazards. No suspected or confirmed occupational disease cases were identified during the year.

Targets

Achieved

0 cases of occupational disease confirmed by authorities

Health check-up coverage for employees **100%**

GCL Technology's Occupational Health Protection Measures for Employees

- Engaging third-party agencies to regularly monitor occupational hazard factors and distribute hazard notification cards. Production safety equipment and automation systems are installed and regularly maintained.
- Distributing personal protective equipment (PPE), including earplugs, dust masks, and safety goggles, is distributed to employees in a timely manner, and their proper use is supervised.
- Providing annual occupational health check-ups for all employees and establishing employee occupational health monitoring records.
- Opening green channels for medical emergencies, providing first-aid kits, AEDs, and other equipment, and improving medical support.

Safety Culture

GCL Technology continuously strengthens employee safety awareness and establishes an "Employee Safety Competency Matrix" mechanism. Through training sessions and emergency response management activities, employees are required to become proficient in safety skills modules, while a normalized random inspection and assessment mechanism has been put in place. The Group has formulated and revised the *EHS Education Management System* and established a three-tier safety training mechanism. In addition, the Group places great importance on emergency response management, revises various emergency response plans, and emphasizes on-site practical drills to enhance the emergency response capabilities of frontline employees.

Firefighting Skills Competition

During "Safe Production Month" in June 2025, Inner Mongolia Xinyuan held a firefighting skills competition. The event included on-site emergency response and evacuation drills for a fire area. Employees were required to operate gas cylinders and wear self-contained breathing apparatus for firefighting, and after rescuing simulated injured persons to a safe area, perform cardiopulmonary resuscitation. This activity effectively helped employees master firefighting methods and escape techniques, comprehensively enhancing their response capabilities in emergencies.

GCL Technology Safety Training Performance

Indicator	2025
Employee safety training coverage (%)	100
Total employee safety training hours (hours)	126,580
Employee emergency drill sessions (times)	2,834
Contractor safety training coverage (%)	100
Contractor safety training hours (hours)	6,216
Contractor emergency drill sessions (times)	65

04

Value Infinity

Sound Operations | Sustainable Supply Chain | Contributing to a Better Society

SDG Goals Addressed in This Chapter

GCL Technology has established a solid governance structure and operating system, regarding compliance as the foundation of corporate development. We are committed to advancing supply chain sustainability, promoting synergistic progress across the industry chain, and continuously expanding the dimensions of value creation through pragmatic fulfillment of responsibilities, thereby creating harmonious economic and social benefits.

V A L U E I N F I N I T Y

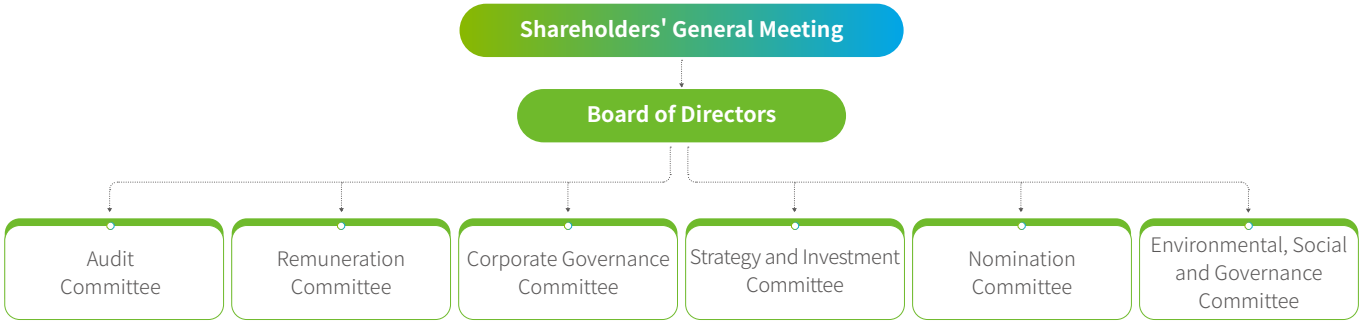
Sound Operations

GCL Technology regards a standardized governance system as its strategic cornerstone, with a focus on enhancing governance efficacy, risk resilience, and information security capabilities to drive sustainable high-quality development.

Corporate Governance

GCL Technology strictly complies with the requirements of laws and regulations such as the *Company Law of the People's Republic of China* and the *Securities Law of the People's Republic of China*, and has formulated and implemented internal policies such as the *Articles of Association*, the *Rules of Procedures for Shareholders' General Meeting*, and the *Rules of Procedure of the Board*, providing clear framework guidance for the Group's standardized operations.

The Group has established a governance structure with clearly defined powers and responsibilities, forming a governance system in which the shareholders' general meeting serves as the highest authority, while the Board and its functional committees perform their respective duties. The Group has established sound Board election procedures and accountability mechanisms for the Board, effectively ensuring orderly operations.



GCL Technology Governance Structure

During the reporting period

GCL Technology convened
1
shareholders' general meeting

Resolutions were passed
8

Resolutions were passed
136

Board meetings
37

Director attendance rate
100%

Board committee meetings
19

Attendance rate
100%

Resolutions were passed
49

Board Independence

To safeguard the professionalism and impartiality of corporate governance, GCL Technology strictly implements the *Independent Director Policy* and requires independent directors to sign the Annual Independence Confirmation. During the reporting period, half of the members of the Group's Strategy Development Committee were independent non-executive directors, and all members of the Audit Committee and the Remuneration Committee were independent non-executive directors, ensuring that they provide independent opinions on corporate governance matters. As of the end of the reporting period, the Board of GCL Technology comprised 10 members, including 4 independent directors, accounting for 40% of the Board.

As of the end of the reporting period

The Board of GCL Technology comprised
10
members

Including
4
independent directors

Accounting for
40%
of the Board

Board Diversity

GCL Technology is committed to building a diverse board structure and has formulated and implemented the *Board Diversity Policy*. In selecting members of the Board, the Group conducts a comprehensive assessment based on a range of diversity criteria, including professional experience, educational background, gender, age, and cultural perspective, to ensure high standards of corporate governance. As of the end of the reporting period, GCL Technology had 1 female director, representing 10% of the Board.

As of the end of the reporting period

GCL Technology had
1
female director

Representing
10%
of the Board

GCL Technology Board Members

ZHU Gongshan

Chairman and Joint CEO

Mr. Zhu Gongshan is the founder of the Company. He has been an Executive Director and the Chairman of the Company since July 2006. He has been appointed as the Joint CEO of the Company since February 2025. Mr. Zhu Gongshan also serves as the chairman of the Global Green Energy Industry Council, the chairman of the Asian Photovoltaic Industry Association, a deputy director of the Green and Low Carbon Development Promotion Committee of China Enterprise Confederation, and an executive vice president of the Electric Vehicle and Energy Storage Branch of China Electricity Council. Mr. Zhu concurrently serves as the executive chairman of the ICC China Environment and Energy Commission, and the chairman of the SNEC Hydrogen Energy Industry Alliance Council. Mr. Zhu Gongshan has been given the "New China 70th New Energy Industry 10 Outstanding Contributors" award, the "Figure of Energy Revolution of 40 Years Reform and Opening" honour, the "Leading Energy Entrepreneur of 40 Years Reform and Opening" honour, etc.

ZHU Yufeng

Vice Chairman

Mr. Zhu Yufeng has been an Executive Director of the Company since September 2009 and is a member of the Remuneration Committee of the Company. He has been appointed as a Vice Chairman of the Board since September 2022. Mr. Zhu Yufeng is the vice chairman of China Electricity Council and he was honored with the "2017 Top Ten People of the Year for China New Energy", "2017 Virtuous Leadership Award", "2021 China Energy Industry Leader", etc. Mr. Zhu graduated from George Brown College (Business Administration Faculty).

ZHU Zhanjun

Vice Chairman

Mr. Zhu Zhanjun has vast experience in the polysilicon and wafer business. He obtained a master degree in business administration from China Europe International Business School in 2013.

SUN Wei

Vice Chairman

Ms. Sun is currently responsible for the corporate finance, financial strategy and management of the Group. She was awarded a doctorate degree in business administration in 2005 and has over 30 years of extensive experience in corporate finance, financial strategy and management.

LAN Tianshi

Joint CEO

Mr. Lan holds a bachelor's degree in chemical engineering and technology from Harbin Engineering University, a master's degree from Sichuan university, and a senior engineer certificate in petrochemical engineering issued by the Jiangsu Petrochemical Engineering Advanced Professional Technical Qualification Evaluation Committee. He has more than 20 years of experience in chemical manufacturing and management.

YEUNG Man Chung, Charles

Chief Financial Officer and Company Secretary

Mr. Yeung holds a Bachelor of Business Administration degree majoring in Accounting. He is a member of the Hong Kong Institute of Certified Public Accountants and CPA Australia, and is also a Certified ESG Planner (CEP®), with over 30 years of experience in accounting, auditing, financial management and risk control. Mr. Yeung is primarily responsible for the financial management and reporting, corporate finance, taxation and risk management of the Company and its subsidiaries.

HO Chung Tai, *SBS, MBE, S.B.St.J., JP*

INDEPENDENT NON-EXECUTIVE DIRECTORS

Dr. Ho has over 60 years of extensive experience in the fields of civil, structural, energy, environmental and geotechnical engineering, as well as the direct management of large-scale engineering projects. He has professional engineering and construction experience in fields such as environmental studies and environmental protection projects. Dr. Ho is currently the honorary chairman and former chairman of the Nuclear Safety Advisory Committee of Guangdong Daya Bay Nuclear Power Station and Ling Ao Nuclear Power Station.

SHEN Wenzhong

INDEPENDENT NON-EXECUTIVE DIRECTORS

Dr. Shen has served as a professor and doctoral supervisor of the Department of Physics and Astronomy, Shanghai Jiao Tong University since 1999. He was appointed as a Distinguished Professor of the Chang Jiang Scholars Programme at Shanghai Jiao Tong University in 2000, and has been the Director of the Solar Energy Research Institute of Shanghai Jiao Tong University since 2007. He has long been engaged in research in the photovoltaic and related fields, successively presiding over and participating in a number of national-level scientific and technological research projects, publishing academic papers in a number of internationally renowned academic journals, and authoring and editing a number of professional works in the photovoltaic field. Dr. Shen obtained his doctoral degree from the Shanghai Institute of Technical Physics, Chinese Academy of Sciences in 1995, and conducted postdoctoral research at Georgia State University in the United States from 1996 to 1999. He is currently the Honorary Chairman of the Shanghai Solar Energy Society.

LI Junfeng,

INDEPENDENT NON-EXECUTIVE DIRECTORS

Mr. Li has been committed to the research of energy economics and the theory of energy and environment. From 1982 to 2011, Mr. Li successively served as an intern researcher, associate researcher, deputy researcher and researcher of the Energy Research Institute under the National Development and Reform Commission. From 2011 to 2017, Mr. Li served as the director of the National Center for Climate Change Strategy and International Cooperation. Since 2021, Mr. Li has served as a standing director of the China Energy Research Society. Mr. Li is currently also a doctoral supervisor of Renmin University of China. Mr. Li won the Zayed Future Energy Prize Lifetime Achievement Award in 2017. Mr. Li graduated from the Shandong Institute of Mining and Technology in 1982 with a bachelor's degree in engineering.

YIP Tai Him[33]

INDEPENDENT NON-EXECUTIVE DIRECTORS

Mr. Yip is a practising accountant in Hong Kong. He is also a member of the Institute of Chartered Accountants in England and Wales and the Association of Chartered Certified Accountants in the United Kingdom. He has over 30 years of experience in accounting, auditing, financial management and risk control.

[33] Mr. Yip Tai Him is an industry expert on the Audit Committee of the Group.

Board Members \ Board Committees	Audit Committee	Remuneration Committee	Nomination Committee	Corporate Governance Committee	Strategy and Investment Committee	Environmental, Social and Governance Committee
Zhu Gongshan					M	
Zhu Yufeng		M				
Zhu Zhanjun					M	
Sun Wei			M			
Lan Tianshi						M
Yeung Man Chung, Charles			M	M	M	M
Ho Chung Tai, Raymond	M	C	M	C	C	M
Shen Wenzhong	M				M	C
Li Junfeng			M	M	M	M
Yip Tai Him	C	M	C	M	M	M

C Chairs of Board Committees M Members of Board Committees

Gender Distribution of Board Members

Male
9

Female
1

Academic Qualification Distribution of Board Members

Bachelor's degree or below
5

Master's degree
2

Doctoral degree
3

Executive Remuneration Management

To establish a sound incentive and restraint mechanism, GCL Technology has formulated and publicly disclosed the *Remuneration Management Policy for Directors, and Senior Executives*, which specifies that the remuneration of relevant personnel consists of two components: base salary and performance-based bonuses. The Group has also established a clawback mechanism to prevent unjust enrichment by senior executives and effectively safeguard shareholder interests. In terms of linking remuneration with sustainable development, the Group has tied the annual performance evaluation of its executive directors, supervisors, and senior executives to ESG performance, promoting deep integration between the personal targets of management and the Group's sustainable development strategy.

Board Empowerment

To enhance the governance efficacy of the Board, GCL Technology has conducted a series of annual training sessions for directors covering key areas such as business ethics, anti-corruption policies, and corporate governance risk management, continuously strengthening directors' compliance awareness and strategic decision-making capabilities. At the same time, the Group has promoted a deeper understanding of the ESG philosophy among the managerial team, driving the Board to comprehensively assess the potential impacts of ESG factors (such as climate change) on the Group's financial performance and long-term value in its strategic decision-making. During the reporting period, we conducted 1 ESG empowerment training session.

Investor Engagement

GCL Technology implements the *Investor Relations Management Policy* and, by systematically establishing diversified communication mechanisms and continuously optimizing its disclosure system, provides the market with timely and accurate corporate information to protect the rights of all types of investors to be informed and to participate. The Group has established communication mechanisms covering multiple formats, including the shareholders' general meeting and earnings briefings.

During the reporting period

GCL Technology conducted a total of
985
investor engagement activities

Issued a total of
61
announcements

Risk Control

GCL Technology regards integrity and probity as an important prerequisite for the Group's long-term development, and strictly controls potential risks in the course of operations to provide a solid safeguard for the Group's stable operations and sustainable development.

Risk Management System

GCL Technology has established a policy framework centered on the *Internal Audit Work Regulations*, the *Guidelines for Internal Control Effectiveness Evaluation*, the *Comprehensive Risk Management Guidelines*, and the *Risk Control Functional-Line Management System*, and continues to optimize the "Three Lines of Defense" risk management framework. The Group has clearly defined risk control responsibilities at all levels and established an end-to-end management mechanism covering risk identification, assessment, response, and supervision. During the reporting period, GCL Technology strengthened the audit of key links such as process additions, node adjustments, and deactivations, and developed processes to achieve risk control coverage for the policy and contract management system.

GCL Technology's "Three Lines of Defense" for Risk Management

Risk Assessment

Guided by the *Comprehensive Risk Management Guidelines for Central State-Owned Enterprises*, GCL Technology, in light of its actual business operations, has established a tier-1 risk classification framework covering six major categories: strategy, operation, compliance, finance, market, capital and resources, as well as standardized database templates. The Group has defined key data dimensions and application scenarios, unified the language system for risk identification and assessment, established a quarterly risk monitoring and assessment mechanism covering the entire value chain, and regularly issues risk assessment reports, thereby achieving dynamic risk identification and tiered early warning to effectively enhance the forward-looking identification capability for major risks.

Internal Control and Audits

Based on actual corporate needs, GCL Technology conducts targeted internal control audits and third-party external reviews to further safeguard the comprehensive compliance of its operating activities. During the reporting period, GCL Technology conducted a total of 25 internal control audits and 2 third-party external reviews, identified 319 internal control issues and 102 medium- and high-risk items, of which 284 required corrective follow-ups. As of the end of the reporting period, the completed rate of risk issues was 95%. The remaining risk issues will continue to be tracked in the following year.

Internal Review

The Group conducts specialized risk screening, procurement audits, executive management reviews, and internal control evaluations, among other projects, to systematically identify management gaps and potential risks in production and operations. During the reporting period, GCL Technology carried out a total of 25 audit and internal control assessment programs.

Third-Party External Audit

Third-party agencies are introduced to conduct joint audits, systematically assess the effectiveness of the Group's risk management mechanism and the compliance standards of project operations, and identify and evaluate potential risks in corporate operations through multidimensional analysis.

Culture Promotion

GCL Technology is committed to building a risk management culture with the participation of all employees and continuously enhancing employee awareness of risk identification and their proactive prevention capabilities. In 2025, GCL Technology conducted special internal control and compliance training sessions for management cadres and personnel in critical positions across all bases, comprehensively communicating the Group's control requirements and effectively improving the compliance of business processes and the performance capability of management personnel. During the reporting period, the Group's internal control and risk management training sessions covered all employees.

Business Ethics

GCL Technology has formulated institutional documents such as the *Code of Business Conduct* and the *Management Standard for Anti-Fraud and Whistleblowing*, explicitly prohibiting corruption, bribery, money laundering, unfair competition, and fraudulent conduct. The Group systematically advances integrity governance by improving governance structures and implementing targeted measures. During the reporting period, GCL Technology strictly complied with business ethics requirements and applicable laws and regulations, did not conduct any lobbying or political financing activities, and recorded no violations involving corruption, unfair competition, or other misconduct.

Policy Framework

GCL Technology strictly complies with business ethics-related regulations such as the *Law of the People's Republic of China Against Unfair Competition* and the *Anti-Money Laundering Law of the People's Republic of China*, and has formulated and implemented the *Code of Business Conduct* as an important guiding document for business ethics governance.

In anti-corruption, GCL Technology has formulated the *Anti-Commercial Bribery Compliance Management Guidelines* and the *Compliance Obligation List*, which set out specific requirements for business ethics standards in its procedures and systematically clarify the corresponding consequences of violations and response measures, thereby providing comprehensive procedural support for business ethics governance. At the same time, we require all employees to sign documents such as the *Anti-Corruption Regulations Commitment Letter* and the *Special Technology Confidentiality Agreement*, so as to implement integrity requirements at the level of specific conduct. During the reporting period, Inner Mongolia Xinyuan and Jiangsu Zhongneng obtained ISO 37001 Anti-Bribery Management System certification.

ISO 37001 Anti-Bribery Management System Certification

In anti-money laundering, GCL Technology has formulated and follows the *Capital Management System*, exercises strict oversight over transaction funds, closely monitors large cash transactions, and rigorously prevents and combats money laundering activities.

In the areas of antitrust and anti-unfair competition, GCL Technology strictly complies with the antitrust and anti-unfair competition laws and regulations applicable in its operating jurisdictions and internationally, regulates its business conduct in accordance with the *Code of Business Conduct*, firmly rejects unfair competition practices such as commercial fraud, and actively upholds a fair and orderly market environment.

In the management of related-party transactions, GCL Technology has established a systematic management system and approval process in accordance with the *Code of Business Conduct*. Through clear authorization mechanisms, rigorous review and assessment, and ongoing process supervision, it ensures that each transaction is commercially reasonable and necessary, thereby effectively preventing conflicts of interest and achieving overall control of related-party transaction risks.

In supplier management, GCL Technology is committed to continuously enhancing the stability and transparency of the supply chain. It has formulated the *Supplier Code of Conduct for Corporate Social Responsibility* and issued the *Notice on Supplier Integrity Building* to regulate suppliers' conduct. In addition, the Group conducts regular audits of suppliers to ensure compliance of business cooperation.

Organizational Structure

GCL Technology has established a business ethics governance framework with clearly defined powers and responsibilities, led by the Audit Committee of the Board, supervised by the audit department, and executed by management teams at various levels. By implementing management mechanisms at different levels, it safeguards compliant and ethical operations.

Business Ethics Audit

GCL Technology has established a business ethics and compliance audit mechanism under which the Group's audit department conducts regular and systematic business ethics and anti-fraud audits of the Group's business units and branches in accordance with the annual audit plan. In principle, the Group conducts full-coverage business ethics audits of relevant entities at least once every three years, and, in conjunction with risk assessment, carries out more frequent special audits and spot checks on high-risk areas and key processes to ensure the effective implementation of ethical standards relating to anti-bribery and anti-corruption, conflicts of interest, and fraud prevention. The scope of auditing covers key links including bribery and corruption risks, expense and reimbursement compliance, the management of suppliers and third-party agencies, procurement and tendering, contract management, gifts and hospitality, financial transactions, and related review and authorization procedures. In 2025, the Group conducted a special assessment of bribery and corruption risks as part of executive departure audits and issued an audit report putting forward rectification recommendations; meanwhile, it also carried out anti-fraud compliance inspections in operational management audits, with a focus on reviewing expense reimbursements, supplier contracts, procurement bidding, and other links. Where clues of fraud or major suspected violations are identified in auditing, the Group will transfer such cases to the supervision/discipline inspection or compliance department for investigation and handling in accordance with procedures, and will implement closed-loop follow-up on rectification measures, taking steps such as policy refinement, accountability, and training and communication where necessary, in order to continuously enhance the effectiveness of business ethics controls.

Culture Promotion

GCL Technology actively promotes a culture of integrity and provides specialized business ethics training and communication for the Board, management teams at various levels, and all employees, including part-time staff, using diversified forms of communication to strengthen employees' awareness of integrity. During the reporting period, GCL Technology recorded **18,816 hours** of business ethics training, with average hours of training per employee reaching **2.28 hours**, while directors received an average of **2.11 hours** of business ethics training, achieving **100%** coverage.

Building a Strong Legal Defense Line: Business Ethics Training

To enhance legal awareness among all employees, the Group conducted regular training sessions in 2025 under the theme of "Building a strong legal defense line," covering more than 1,000 participants. The courses were tailored to different roles: senior management focused on occupational crimes and compliance responsibilities, business personnel focused on risks such as commercial bribery, and ordinary employees focused on legal red lines in daily life such as personal information protection. Through instruction based on real cases, the training sessions highlighted the warning that "the difference between illegality and crime often lies in a single thought," promoting the integration of legal awareness into daily work and gradually building a compliance ecosystem in which everyone knows the boundaries and everything is conducted according to the rules.

GCL Technology regularly conducts promotional activities on anti-unfair competition, continuously strengthening awareness of fair competition among all employees and deeply integrating anti-unfair competition requirements into the corporate culture.

Building a Strong Compliance Defense Line: GCL Technology's Anti-Unfair Competition Training in 2025

In 2025, GCL Technology conducted a special promotional campaign on anti-unfair competition, focusing on high-risk links such as procurement and the supply chain, and strengthening compliance awareness through an "education + procedures + supervision" mechanism. By analyzing real cases such as commercial bribery, the campaign clarified legal red lines and enhanced risk identification capabilities among all employees.

Complainant and Whistleblower Protection

GCL Technology strictly complies with the requirements of the *Management Standard for Anti-Fraud and Whistleblowing* and has established a secure anonymous reporting mechanism. The Group has set up a 24-hours hotline and dedicated email address to encourage employees in all locations and stakeholders to promptly report violations identified in daily operations through letters, emails, phone calls, or face-to-face meetings. We solemnly undertake to maintain strict confidentiality over reporting information and the identities of whistleblowers, and to firmly oppose any form of retaliation against whistleblowers.

Reporting and Complaint Channels

Phone reporting: 0512-68533870 (24/7)

Email: xxpvjubao@gcl-power.com

Information Security and Privacy Protection

GCL Technology strictly complies with the requirements of applicable laws and regulations at its operating bases, including the *Cybersecurity Law of the People's Republic of China*, the *Data Security Law of the People's Republic of China*, and the *Personal Information Protection Law of the People's Republic of China*, and continues to improve its information security protection system to strengthen its security defenses. During the reporting period, GCL Technology did not experience any customer information or privacy breaches.

Policy Framework

GCL Technology has formulated and disclosed the *Information Security Management System*, the *Personal Information Security Management System*, the *Customer Information Management Standards*, and other policies to comprehensively standardize information security management, achieving full coverage across all business units and subsidiaries. During the year, we comprehensively refined the *Management System for the Electronic Document Security Management System*, further clarifying management requirements for the classification, storage, transmission, and destruction of electronic documents and other links.

Organizational Structure

GCL Technology has established a dedicated team to advance information security and confidentiality, which comprehensively coordinates the standardized management of privacy and data security.

Information Security Committee	• The Information Security Committee serves as the highest management body and led by Executive Director and Joint CEO Lan Tianshi, who provides overall coordination and advancement of information security management. • Responsible for reviewing the overall implementation plan for the Group's document security and confidentiality projects. • Coordinate the establishment of confidentiality organizations across all business segments. • Supervise the implementation of document security and confidentiality work across all responsible departments, business divisions, and project companies.
Digital & Information Management Department and Information Departments of All Bases	• Responsible for the development of the document security and confidentiality platform. • Lead the formulation of project rules, management strategies, and classification standards related to document security and confidentiality. • Prepare advancement plans for document security and confidentiality work and organize their implementation.

GCL Technology Information Security Management Structure

Management Measures

GCL Technology regularly conducts internal and external information security audits and assessments annually to validate the effective operation of its information security management system covering all operations. The Group has established a unified control platform and systematically deployed technical measures such as data breach prevention, cybersecurity protection, and terminal management. Combined with routine security awareness training sessions and practical cybersecurity drills, these efforts comprehensively build a security protection framework for the Group's information assets and safeguard their continuous and stable operation.

Anti-leakage measures

Deploy data breach prevention technologies to effectively prevent information leakage, data breaches and cyber threats. It improves the processes for managing the external transmission of documents, and establish audit and monitoring protocols for outbound data to prevent the risk of internal information leaks.

Terminal security protection

Establish a robust vulnerability detection and management system to ensure that vulnerabilities and patches across all PC endpoints are remediated in a timely manner, effectively reducing the risk of system attacks.

Software management

Implement unified control over software across all PC endpoints, covering the full lifecycle of installation, removal, and version updates, to ensure standardized and secure software use.

Emergency response management

Develop comprehensive emergency preparedness and response plans to ensure the effective handling of security incidents such as IT system disruptions and cyberattacks.

Development of GCL Technology's integrated terminal security platform by the Digital and Information Center

In August 2025, GCL Technology successfully completed the construction of the integrated terminal security program of the Digital and Information Center. Based on the Group's requirements for intellectual property rights and information security protection, the program effectively prevents intentional or unintentional information leaks, theft of intellectual property rights, and ransomware attacks through the deployment of data loss prevention technologies; standardizes outbound transmission behavior by restricting channels for sending confidential files externally and establishing audit rules; fully enables anti-ransomware measures to reduce the cyberattack surface and safeguard the safety of digital assets and production equipment in core departments; and optimizes the electronic document security management system to achieve analysis of login device information and enhance the ability to identify high-risk information leakage behavior.

Standardized Information Handling

GCL Technology strictly adheres to the three principles of legality, minimization, and security to standardize the full lifecycle management of customer information. Based on data classification and grading standards, differentiated security measures are implemented for information at different levels to ensure the security and compliance of the full lifecycle of data processing.

Training and Exercises

GCL Technology regularly conducts information security training for all employees to comprehensively enhance employees' awareness of information protection. During the reporting period, GCL Technology conducted a total of 4 information security training sessions and carried out cybersecurity drills, with employee coverage reaching 100%, including part-time workers and contractors.

During the reporting period

GCL Technology conducted a total of

4

information security training sessions

Carried out cybersecurity drills, with employee coverage reaching

100%

including part-time workers and contractors

GCL Technology Conducts Information Security Training

In December 2025, the Digital and Information Center of GCL Technology successfully held an information security training session covering all business segments, with the number of participants exceeding 700, a record high. Guided by the themes of "awareness awakening, knowledge dissemination, and skills strengthening," the training focused on practical content such as data classification and grading, phishing email identification, and ransomware response through a "theory + case" teaching approach, while also providing targeted guidance on the characteristics of the PV industry and emerging risks such as AI fraud. The training effectively reinforced employees' awareness that "everyone is the first person responsible for security," filled security knowledge gaps across different positions, and established a dual protection system of "human defense + technical defense" for the enterprise.

Red Versus Blue Team Exercises

During the exercises, GCL Technology carried out precise penetration testing by simulating real-world cyberattack scenarios. Leveraging its existing protection system, the Group responded rapidly and handled incidents in a well-structured manner, effectively intercepting various types of attacks. The exercises identified weak links in information security protection and enhanced staff members' emergency response capabilities and collaborative efficiency, achieving the expected exercise targets. In addition, GCL Technology will improve protection measures in response to the issues identified during the exercises, strengthen routine drills, and further reinforce its cybersecurity defenses.

Responsible Procurement

GCL Technology continues to strengthen its supply chain management structure through policy refinement and process re-engineering, systematically embedding sustainable development requirements into supplier lifecycle management to build a safe, efficient, responsible, and resilient supply chain system.

Supply Chain Management

GCL Technology has established a three-tier supply chain governance structure comprising the "Supply Chain Management Committee - Supply Chain Management Department of the Silicon Industry Group - Supply Chain Departments at Different Bases," further clarifying the division of responsibilities for strategic decision-making, overall coordination and management, and frontline execution, and laying a solid organizational foundation for supply chain management. In addition, the Group has continued to improve its policy framework for the supply chain. In 2025, it updated core policies such as the *Supplier Management Policy* and the *Procurement Management Policy*, standardizing end-to-end management procedures for supplier onboarding, evaluation and verification, tiered management, and elimination, promoting deep integration between management requirements and business practices, and strengthening the foundation for standardized and precise management.

GCL Technology's Supply Chain Governance Structure

Supply Chain Management Committee
Based on GCL Technology's strategic development plans and operational objectives, it makes decisions on the overall quantity, quality, and future demand of suppliers in key procurement categories.

Supply Chain Management Department of the Silicon Industry Group
As the coordinating management center, it is responsible for revising and supervising the implementation of procedures across the entire chain, including supplier management, procurement, and logistics;
It also coordinates ESG management in the supply chain, including related matters such as supplier quality audits, performance evaluations, and training sessions.

Supply Chain Departments at Different Bases
It is responsible for implementing specific supplier onboarding, assessments, dynamic management, and on-site audits to ensure that all procedures are effectively implemented at the operational level.

In terms of target setting, GCL Technology has identified "cost reduction via tendering, signing of framework agreements, deeper application of data dashboards, and supply chain compliance" as its core management objectives for 2025, systematically guiding supply chain efforts and continuously driving long-term value creation and operational efficiency improvements.

Supply Chain Management Goals and Achievements

	Cost Reduction via Tendering	Increased Proportion of Framework Agreement Signing	Data Dashboard Development	Supply Chain Compliance
Targets	Reduce costs and improve efficiency through systematic tendering and improve the efficiency of procurement fund utilization.	Advance the signing of framework agreements for recurring procurement categories, improve procurement efficiency, and enhance supply chain stability.	Build and improve the data dashboard to support real-time monitoring, predictive analysis, and intelligent decision-making.	Enhance the compliance framework to prevent material supplier violations, targeting zero major non-conformities in 2025.
Achievement	As of the end of the reporting period, the Group's cost reduction amount reached RMB 170 million.	In 2025, the Group achieved 100% framework agreement coverage for recurring materials.	Creating real-time visibility of inventory levels for raw and auxiliary materials and low-value consumables, conducting predictive analysis of material consumption for key materials, pricing, and public market prices, and providing analytical feedback on procurement order status and abnormal orders.	In 2025, the Group met the annual suppliers' compliance target.

Supply Chain Centralized Procurement Achieved Remarkable Results, with Annual Cost Reductions of RMB 100 million for Non-Silicon Powder Materials

In 2025, GCL Technology fully implemented supply chain centralized procurement and established a centralized procurement model of "centralized negotiation and centralized signing, with orders placed by the bases" for materials across its four polysilicon bases, with an annual centralized procurement scale of approximately RMB 3.1 billion. Through this initiative, the supply chain fully leveraged volume-based pricing advantages to achieve significant cost reductions in the procurement of materials other than silicon powder, with cumulative cost reductions of approximately RMB 100 million. As silicon powder prices fluctuate with market conditions, the extent of its cost reduction and the cost reduction amount were not included in the statistics.

In 2025

An annual centralized procurement scale of approximately

RMB3.1billion

Achieved significant cost reductions in the procurement of materials other than silicon powder, with cumulative cost reductions of approximately

RMB100million

At the supplier management level, the Group continuously strengthened closed-loop, full-lifecycle management of suppliers.

GCL Technology's Supplier Management System

Supplier onboarding

Invite suppliers to register on the Supply Chain Management platform and submit documents such as corporate qualifications, product certifications, financial status, and system certificates;

After passing the qualification review and assessment, suppliers enter the final approval stage and become qualified suppliers upon approval.

Evaluation

Based on the Supply Chain Management platform of GCL Intelligent Chain, quarterly performance evaluations are conducted for suppliers. Suppliers are evaluated according to contract fulfillment and are subject to dynamic tiered management from Level I (highest) to Level IV (lowest).

Tiered management

Continue to implement tiered management for suppliers based on dimensions such as material categories, procurement amount, and contract fulfillment performance, and apply differentiated resource allocation and cooperation strategies.

For suppliers with contract fulfillment scores of $70 \leqslant X \leqslant 80$, formulate improvement measures and file them on the platform to enhance suppliers' contract fulfillment capabilities.

Elimination

Suppliers involved in fraud, information leaks, equity relationships, major environmental or safety incidents, or with contract fulfillment evaluation results below 70 points shall be subject to disqualification.

Number of Suppliers of GCL Technology[34]

Total number of suppliers	Mainland China	Hong Kong, Macao, Taiwan Regions of China and Overseas
1,432	1,431	1

[34] During the reporting year, the statistical scope for suppliers has been revised to "suppliers with actual procurement contracts executed in the year and annual cooperation value exceeding RMB 200,000", leading to a decline in the total number of suppliers.

Sustainable Supply Chain

GCL Technology continues to refine the governance system for sustainable development in its supply chain, clarifies that the Board bears ultimate responsibility for sustainable management of the supply chain, and assigns the ESG Committee and the Sustainability Management Committee to provide oversight and guidance. Our verified Statement of Conformity with ISO 20400 Sustainable Procurement Guidelines establishes systemic foundations for green, low-carbon, and ethical supply chain development.

Statement of Conformity with ISO 20400

GCL Technology has established the *Sustainable Procurement Policy* and the *Supply Chain Due Diligence Guidelines*, incorporating core ESG issues such as environmental protection, labor rights, ethical compliance, and workplace safety into the scope of supply chain management. The Group mandates suppliers to sign the *GCL Group Partner Declaration* with its annex the *GCL Group Supply Chain Partner Code of Social Responsibility*, binding them to explicit accountability requirements. At the same time, we issued the *Initiative on Water Conservation, Energy Saving and Waste Reduction in the Supply Chain*, calling on core suppliers to set quantitative targets and take actions in water conservation, energy saving, and waste resource utilization. In our cooperation, we give priority to suppliers that have obtained ESG-related certifications.

GCL Technology's ESG Expectations for Suppliers

Environmental Protection	• Suppliers are required to comply with laws and regulations on environmental protection, with priority given to suppliers holding environmental qualifications, valid permits for waste emissions, and system certifications such as ISO 14001 Environmental Management System and ISO 14067 Product Carbon Footprint Certifications; • GCL Technology issued the *Initiative on Water Conservation, Energy Saving and Waste Reduction in the Supply Chain* to encourage suppliers to set quantitative targets around water resource management, energy management, and waste management; prioritize the adoption of low-consumption equipment and processes; establish monitoring systems to track water usage and energy consumption data; implement classified management of solid waste; and give priority to biodegradable and recyclable materials. To ensure implementation, the Group incorporates key data into supplier onboarding and evaluation assessments, requires core suppliers to submit them annually, and organizes training sessions and exchange activities from time to time to enhance their capabilities.
Health and Safety	• Established supplier safety management procedures such as the *Safe and Civilized Construction Management System* and the *Detailed Rules for the Management of High-Risk Projects*. • For new suppliers, priority is given to cooperating with suppliers that have obtained ISO 45001 Occupational Health and Safety Management System certification, and the Group signs safety responsibility agreements with suppliers. • For existing suppliers, the Group adds health and safety-related appendices to contracts to clarify suppliers' safety targets and safety responsibilities during project implementation and ensure production safety.
Conflict Minerals	• All core suppliers are required to sign the *Conflict Minerals Declaration*[35] to eliminate related risks at the source. • Conflict minerals investigations are treated as a fixed component of ESG risk assessment and incorporated into the risk review items of supplier due diligence.
Ethical Compliance	• During the supplier onboarding process and before each tender, anti-corruption requirements are clearly communicated to instill compliance awareness in advance. • For every contract signed with existing suppliers, the *Anti-Corruption and Anti-Fraud Commitment Letter* is added as an appendix to regulate conduct. • Suppliers are regularly reminded of integrity and disciplinary requirements every month, and a culture of compliance is continuously reinforced through platforms such as the "GCL Bidding" WeChat official account. • Anti-bribery due diligence is conducted on suppliers through methods such as questionnaires and record audits to ensure the transparency and compliance of business conduct.
Quality Management	• Emphasis is placed on supplier qualification and delivery quality, with priority given to cooperation with suppliers that have obtained ISO 9001 Quality Management System certification.

[35] Conflict minerals include tantalum, tin, tungsten, gold, cobalt, or their derivatives sourced from the Democratic Republic of the Congo or adjoining countries, as defined by internationally recognized borders.

GCL Technology Suppliers' ESG Management Performance in 2025

Topic Category	Indicator	Unit	2025
Signing rate of the *GCL Group Code of Social Responsibility Conduct for Supply Chain Partners* among suppliers		%	100
Environmental	Number of core suppliers certified under ISO 14001 Environmental Management System	/	73
Social	Number of core suppliers certified with ISO 45001 Occupational Health and Safety Management System	/	70
	Signing rate of supplier safety responsibility letters	%	100
	Signing rate of the *Conflict Minerals Declaration* among core suppliers	%	100
Quality management	Number of core suppliers certified with ISO 9001 Quality Management System	/	81
Business ethics	Signing rate of suppliers' commitments against commercial bribery and anti-fraud	%	100

ESG Due Diligence

In accordance with the *Supply Chain Due Diligence Guidelines*, GCL Technology systematically conducts annual ESG risk assessments for suppliers and standardizes risk identification, assessment, management, and appeal mechanisms. Through a three-dimensional screening mechanism of "supplier self-assessment + Company review + third-party data comparison," the Group conducts a comprehensive review of suppliers' performance in environmental, social and governance (ESG), and material traceability.

In 2025, we systematically identified 251 suppliers with significant business relevance to the Group (including 18 tier-one key suppliers[36] and 233 non-tier-one key suppliers[37]), and conducted special ESG audits of 50 core and key suppliers, identifying a cumulative total of 593 improvement items. We implemented tiered risk controls and promoted targeted rectification and improvement. Among the 50 important suppliers that completed on-site or questionnaire-based assessments, we found no significant negative ESG impacts, and no suppliers had their cooperation terminated during the year.

In 2025

We systematically identified
251 suppliers
with significant business relevance to the Group

Tier-one key suppliers
18

Non-tier-one key suppliers
233

Conducted special ESG audits of
50
core and key suppliers

Identifying a cumulative total of
593
improvement items

Measures for Managing Suppliers at Different ESG Risk Levels

Risk Level	Response
High risk	• Immediately suspend new orders, issue the *Notice Requiring Rectification Within a Prescribed Time Limit*, require rectification to be completed within 3 months, and initiate the exit procedure for those who refuse to make rectification.
Medium risk	• Develop tailored corrective action plans for each supplier, set quantitative targets, and include them in the quarterly tracking list.
Low risk	• Include them in the ESG empowerment plan, provide standardized improvement guidelines, and promote continuous enhancement

[36] Tier-One Key Suppliers: Suppliers identified as having significant business relevance to the Group, which directly supply goods, materials, or services (including intellectual property rights (IPR) and patents) to the Group.

[37] Non-Tier-One Key Suppliers: Suppliers identified as having significant business relevance to the Group, which provide products and services to the Group through tier-one suppliers.

Key Findings and Rectification Results

Category	Proportion	Non-Compliance Issues	Suggested Supplier Actions
Environmental	23% 	Lack of biodiversity protection policies	Develop biodiversity protection policies, define protected zones, and implement training programs
		No records were provided for greenhouse gas (GHG) emissions	Establish a GHG emissions monitoring system and regularly record and compile GHG emissions data
Social	22% 	Lack of sufficient first-aid personnel	Provide sufficient first-aid personnel, conduct regular first-aid training sessions, and enhance employee safety awareness
		No drinking water testing report was provided	Establish a drinking water testing mechanism, conduct regular testing, and retain testing reports
Governance	34% 	Business ethics has not undergone third-party auditing	Conduct third-party business ethics audit and establish a regular audit mechanism
		Lack of ISO 37001 Anti-Bribery Management System certification	Launch ISO 37001 certification and assign employees to oversee the process
Material Traceability	21% 	Requirements of the supply chain ESG due diligence policy were not communicated to lower-tier suppliers	Establish clear communication channels to ensure ESG standards are understood and followed

While strengthening management, we also focus on joint capacity building. During the reporting period, 518 suppliers participated in the Group's long-term ESG capacity-building program to jointly enhance the resilience of supply chain sustainable development.

Supply Chain Assessment Performance Table in 2025

Supplier Identification and Classification

Total number of suppliers identified as having significant business relevance to the Group

251

Of which:

Total number of tier-one key suppliers

18

Total number of non-tier-one key suppliers

233

Assessment and Audit

Total number of core and key suppliers that passed on-site assessment

50

Number of suppliers identified through assessment as having significant actual/potential negative impacts

0

Number of suppliers for which cooperation was terminated due to significant negative impacts

0

Supplier Capacity Building

Total number of suppliers participating in capacity building programs

518

Supplier Empowerment

GCL Technology regards suppliers as key partners in sustainable development. By implementing a dual-end empowerment strategy, we are dedicated to building a supply chain ecosystem featuring knowledge sharing, shared responsibility, and mutual value creation through diversified and systematic empowerment initiatives. On the one hand, we strengthen our internal professional foundation by systematically conducting training sessions for internal procurement, audit, and managerial teams to enhance the implementation capability and professional standards of ESG audit criteria. On the other hand, we deepen coordinated development externally by helping suppliers improve their management capabilities and technology through various forms such as training sessions, audit support, and technical cooperation. Through internal-external coordination and two-way enhancement, we continuously strengthen the overall resilience, responsibility standards, and sustainability performance of the supply chain.

In 2025, the Group conducted a total of 152 supplier training sessions, with total training hours reaching 193 hours. The total number of suppliers participating in all types of training sessions reached 518.

In 2025

The Group conducted a total of
152
supplier training sessions

Total training hours reaching
193hours

The total number of suppliers participating in all types of training sessions reached
518

GCL Technology Supplier Training Exchange Meeting

In 2025, GCL Technology deepened strategic collaboration with suppliers through a model combining routine training and thematic intensive training sessions. The Group established a monthly one-on-one technical communication mechanism with core suppliers such as steel wire suppliers and jointly carried out process analysis and quality improvement initiatives. At the same time, the Group organized multiple centralized ESG training sessions for suppliers to systematically communicate requirements related to social responsibility, workplace safety, and business ethics. Through exchange and training sessions with suppliers, the Group helped suppliers resolve technical issues, improve supply chain quality and cost efficiency, significantly enhance suppliers' awareness of ESG risks and management capabilities, and promote the sustainable and coordinated development of the value chain.

Supplier Training Exchange Meeting

Synergistic Green Logistics for a Low-Carbon Future

In 2025, to achieve emissions reduction and lower energy consumption in the logistics link, GCL Technology worked together with logistics suppliers and made coordinated efforts from both vehicle onboarding and transportation scheduling. The Group clearly required that onboarded transport vehicles give priority to China VI or new energy standards, and achieved an 80% compliance rate for vehicles at the Leshan GCL base. Meanwhile, the Xuzhou Photovoltaic base optimized scheduling and encouraged suppliers to consolidate cargo by order region and prioritize full-truckload shipment, effectively reducing empty-load rate. Together, these two measures advanced carbon emissions reduction in the transportation link and represent a concrete practice of coordinated upstream and downstream efforts in the supply chain to pursue green development.

Supplier Training Performance

Indicator	Unit	2025
Number of supplier training sessions	/	152
Total training hours	hour	193
Number of participating suppliers	/	518
Number of anti-corruption training session	/	265
Anti-corruption training coverage	%	100
Supplier integrity agreement signing rate	%	100

Community Engagement

GCL Technology has always regarded actively fulfilling its social responsibility, deeply integrating into and giving back to communities, as an important cornerstone of corporate sustainable development. In 2025, we took actions across multiple dimensions, including environmental protection, charitable initiatives, and emergency disaster relief, encouraging employees to participate extensively and convey warmth and protect nature through concrete actions, striving to create a harmonious and better future together with communities.

In 2025

The Group invested approximately

RMB 2.0059 million

in community investment and charitable initiatives, covering areas including rural revitalization, education, communities, and environmental protection

During the reporting period, employees participated in volunteer activities

40 participants

Contributing a total of

70 hours

"Hearts Connected as One, Building Our Home Together" — Emergency Support for the Earthquake-Affected Area in Shigatse

After a magnitude 6.8 earthquake struck Dingri County, Shigatse City, Tibet, in January 2025, GCL Technology immediately launched the "Hearts connected as one, building our home together" support initiative. The Group broadly mobilized internally, encouraging employees to uphold the guidelines of "carrying gratitude in the heart and practicing dedication through action" and contribute to the disaster-stricken area through Alipay's public welfare platform. In just five days, a total of 233 employees participated in donations, raising a total of RMB 13,525.11 in charitable funds, with the per capita donation far exceeding the platform average. This rapid response demonstrated GCL Technology's social responsibility in overcoming difficulties together with compatriots.

"Hearts Connected as One, Building Our Home Together" Support Action for the Shigatse Earthquake

In terms of employee volunteer service, GCL Technology actively builds platforms and encourages employees to participate in person, extending green responsibility from industrial operations to ecological protection and putting its sustainable development philosophy into practice through concrete actions.

Continuing to Light Up "Earth Hour" as Low-Carbon Concepts Take Deep Root in People's Hearts

On March 22, 2025, GCL Technology continued to honor its environmental protection commitment by simultaneously holding GCL Earth Hour activities at multiple bases across the country, including Xuzhou, Baotou, Hohhot, and Leshan. Through forms such as lights-off ceremonies, the Group not only communicated the urgency of energy conservation and emissions reduction internally and externally, but also deepened this activity, which has continued for more than a decade, into a corporate tradition of environmental culture, reflecting its long-term commitment to transforming environmental awareness from individual behavior into collective action and ultimately supporting the country's "carbon peak and carbon neutrality" goals through green industry practices.

"GCL Earth Hour" Activity

ESG Performance Indicators[38]

KPIs		Unit	2025	2024	2023
Green Infinity					
Emissions					
Emissions of waste gas	Nitrogen oxides (NO_x)	tonne	550.87	463.76	499.65
	NO_x emission intensity	kg/MW of wafers	2.13	1.95	2.31
		tonne/USD million revenue	0.27	0.22	0.11
	Sulfur oxides (SO_x)	tonne	447.44	434.70	344.36
	SO_x emission intensity	kg/MW of wafers	1.73	1.83	1.60
		tonne/USD million revenue	0.22	0.21	0.07
	Particulate matter (PM)	tonne	185.09	157.31	203.38
	Particulate matter (PM) emission intensity	kg/MW of wafers	0.72	0.66	0.94
		tonne/USD million revenue	0.09	0.07	0.04
	Volatile organic compound (VOC) emissions	tonne	2.59	3.09	3.02
	Volatile organic compound (VOC) emission intensity	kg/MW of wafers	0.010	0.013	0.014
		tonne/USD million revenue	0.001	0.001	0.001
Discharge of wastewater	Total wastewater discharge	10,000 tonnes	516	674	933
	Wastewater discharge intensity	10,000 tonnes/MW of wafers	0.002	0.003	0.004
		ten thousand tonnes/USD million revenue	0.251	0.321	0.196

KPIs		Unit	2025	2024	2023
Disposal of hazardous waste	Hazardous waste	tonne	1,801	1,405	2,218
	Hazardous waste generation intensity	tonne/MW of wafers	0.007	0.006	0.010
		tonne/USD million revenue	0.877	0.669	0.466
Disposal of non-hazardous waste	Non-hazardous waste	tonne	182,683	187,910	159,374
	Non-hazardous waste generation intensity	tonne/MW of wafers	0.71	0.79	0.74
		tonne/USD million revenue	89.02	89.47	33.50
Resource Consumption					
Energy consumption	Coal	tonne	1,013,999	858,794	827,818
	Gasoline	tonne	80	83	115
	Diesel	tonne	1,286	1,122	1,044
	Natural gas	ten thousand m^3	17,478	21,477	16,238
	Purchased electricity	MWh	3,549,572	5,240,219	6,413,268
	Purchased thermal power	GJ	3,438,572	4,492,684	6,427,463
	Comprehensive energy consumption	MWh	20,349,642	19,401,323	18,402,249
	Comprehensive energy intensity	MWh/MW of wafers	78.70	81.65	85.24
		MWh/USD million revenue	9,915.74	9,237.53	3,867.53

[38] Due to adjustments in production volume data and the statistical calibers of certain environmental data, the 2023–2024 indicators related to wastewater pollutants, hazardous waste, non-hazardous waste, coal, diesel, and greenhouse gas emissions have been restated.

KPIs		Unit	2025	2024	2023
Water consumption	Total water usage	10,000 tonnes	2,673	2,673	2,823
	Total water usage intensity	tonne/MW of wafers	103.35	112.51	130.74
	Total water use intensity	ten thousand tonnes/ USD million revenue	1.30	1.27	0.59
	Total water withdrawal	10,000 tonnes	583	563	696
	Total water withdrawal intensity	tonne/MW of wafers	22.54	23.70	32.24
		ten thousand tonnes/ USD million revenue	0.28	0.27	0.15
	Total water consumption	10,000 tonnes	1,739	1,761	/
	Total water consumption intensity	tonne/MW of wafers	67.25	74.09	/
	Total water consumption intensity	ten thousand tonnes/ USD million revenue	0.85	0.84	/
Packaging material use	Total use of packaging materials	tonne	21,914	24,052	25,058
	Packaging material intensity	tonne/MW of wafers	0.08	0.10	0.12
		tonne/USD million revenue	0.22	0.22	0.10
Climate Change					
GHG emissions	Scope 1 emissions	tCO_2e	3,864,270	3,423,445	3,061,989
	Scope 2 emissions location-based	tCO_2e	5,207,241	5,208,754	5,867,157
	Scope 2 emissions market-based	tCO_2e	2,560,124	3,213,637	5,250,287
	Total GHG emissions (Scope 1 and 2) location-based	tCO_2e	9,071,511	8,632,199	8,929,146
	Total GHG emissions (Scope 1 and 2) market-based	tCO_2e	6,424,394	6,637,081	8,312,276
	Total GHG emissions (Scope 1, 2 and 3) location-based	tCO_2e	14,889,781.23	14,322,066.45	13,940,145.94
	Total GHG emissions (Scope 1, 2 and 3) market-based	tCO_2e	12,242,664.21	12,326,948.94	13,323,276.56
	Total GHG emission intensity (Scope 1 and 2) location-based	tCO_2e/MW of wafers	35.08	36.33	41.36
		tCO_2e/USD million revenue	4,420.26	4,110.04	1,876.60
	Total GHG emission intensity (Scope 1 and 2) market-based	tCO_2e/MW of wafers	24.84	27.93	38.50
		tCO_2e/USD million revenue	3,130.41	3,160.10	1,746.96
Talent Infinity					
Employment					
Number of employees		head counts	8,253	10,844	15,002
By Employment Type	Permanent employees	head counts	8,120	9,305	12,446
	Non-permanent employees	head counts	133	1,539	2,556
By Job Level	Senior management	head counts	60	70	62
	Middle management	head counts	367	268	281
	Frontline employee	head counts	7,693	8,967	12,103
By Gender	Male	head counts	6,471	7,333	9,853
	Female	head counts	1,649	1,972	2,593
By Age	30 and below	head counts	2,402	2,897	4,346
	31-50	head counts	5,458	6,103	7,827
	Above 50	head counts	260	305	273

KPIs		Unit	2025	2024	2023
By Region	Chinese mainland	head counts	8,086	9,273	12,414
	Hong Kong, Macao, and Taiwan of China	head counts	28	24	25
	overseas	head counts	6	8	7
Number of New Hires by Age	30 and below	head counts	266	408	N/A
	31-50	head counts	445	583	N/A
	Above 50	head counts	3	16	N/A
Number of New Hires by Job Level	Senior management	head counts	4	3	N/A
	Middle management	head counts	3	4	N/A
	Frontline employee	head counts	707	1,000	N/A
Number of Middle and Senior Management Roles by Gender	Female	head counts	70	45	39
	Male	head counts	357	293	304
Number of Middle and Senior Management Roles by Age	30 and below	head counts	1	1	2
	31-50	head counts	358	258	273
	Above 50	head counts	68	79	68
Employee Turnover					
Overall turnover rate		%	11.44	16.9	22.9
By Gender	Male	%	11.88	17.1	23.2
	Female	%	9.70	16.2	22.0
By Age	30 and below	%	19.15	23.6	32.4
	31-50	%	8.10	13.8	17.9
	Above 50	%	10.67	7.0	16.5
By Region	Chinese mainland	%	11.49	16.9	23.0
	Hong Kong, Macao, and Taiwan regions of China	%	0	7.7	0
	Overseas	%	0	0	0

KPIs		Unit	2025	2024	2023
Employee Training and Development					
Annual number of training participants		head counts	8,253	9,305	12,446
Total hours of training		hour	442,073	779,737.81	980,137
Average hours of training per employee		hour	53.57	83.80	78.75
Occupational Health and Safety					
Number of employee injury incidents		/	37	36	38
Number of work-related fatalities - employee		head counts	0	0	0
Hours lost due to employee injuries		hour	7,000	9,098	11,832
Lost-time injury frequency rate per 200,000 working hours for employees		/	0.46	0.39	0.31
Tech Infinity					
Technological Innovation					
R&D investment		RMB million	850	1,102	1,873
		USD million	121	157	264
R&D investment accounting for the annual revenue		%	5.89	7.30	5.56
Number of Patents	Number of patents applied	/	253	259	219
	Number of patents granted	/	179	207	110
	Total number of patents granted	/	1,398	1,282	1,067
Customer Services					
Annual average customer satisfaction rate		score	94.89	96.80	96.85
Number of customer complaints		/	0	136	289
Customer complaint resolution rate		%	100	100	100

KPIs		Unit	2025	2024	2023
Value Infinity					
Corporate Governance					
Number of shareholders' meetings		/	1	1	1
— Number of resolutions passed		/	8	8	N/A
Number of board meetings		/	37	19	28
— Director attendance rate		%	100	100	N/A
— Number of resolutions passed		/	136	84	N/A
Number of board committee meetings		/	19	17	3
— Attendance rate		%	100	100	N/A
— Number of resolutions passed		/	49	46	N/A
Number of Directors by Gender	Male	head counts	9	9	9
	Female	head counts	1	1	1
Number of Directors by Education Level	Bachelor's degree or below	head counts	5	5	N/A
	Master's degree	head counts	2	2	N/A
	PhD degree	head counts	3	3	N/A
Supplier Management					
Total number of suppliers		/	1,432	2,532	2,957
Number of suppliers in China Mainland		/	1,431	2,529	2,954
Number of overseas suppliers in Hong Kong, Macao, Taiwan of China and overseas regions		/	1	3	3
Signing rate of the *GCL Group Code of Social Responsibility Conduct for Supply Chain Partners* among core suppliers		%	100	100	N/A
Number of core suppliers certified under ISO 14001 Environmental Management System		/	73	127	N/A
Number of core suppliers certified with ISO 45001 Occupational Health and Safety Management System		/	70	124	N/A
Number of core suppliers certified under ISO 9001 Quality Management System		/	81	154	N/A
Signing rate of supplier safety responsibility letters		%	100	100	N/A
Signing rate of the *Conflict Minerals Declaration* among core suppliers		%	100	100	N/A
Number of supplier training sessions		/	152	343	371
Total training hours		hour	193	468	582
Number of participating suppliers		/	518	1,019	1,348
Number of anti-corruption training sessions		/	265	322	N/A
Anti-corruption training coverage		%	100	100	100
Supplier integrity agreement signing rate		%	100	100	N/A
Community Investment and Participation					
Annual total expenditure on community investment and volunteer activities		RMB 10,000	200.59	1,348.47	240
Number of employee participation in public welfare/volunteer activities		/	40[39]	517	395
Hours of employee participation in public welfare/volunteer activities		hour	70	406	583
Business Ethics Training					
Total training sessions		/	70	67	18
Training for board members		hour	21.1	18.2	13.5
Board training coverage		%	100	100	100
Training hours for employees		hour	18,816	13,367	5,000
Employee training coverage		%	100	100	100
Number of concluded legal cases regarding corrupt practices		/	0	0	1

[39] In 2025, the Group focused on engaging in online public welfare and volunteer activities. Due to difficulties in tracking the number of participants and hours contributed by employees in such online activities, the data on employee participation in public welfare/volunteer activities — both in terms of participant count and duration — showed significant fluctuations compared to 2024.

Hong Kong Stock Exchange ESG Index

Environmental, Social and Governance Subject Area, General Disclosures and KPIs			Section
Environmental			
A1: Emissions	General disclosure	Information on the policies and compliance with relevant laws and regulations that have a significant impact on the issuer relating to air emissions, discharges into water and land, and the generation of hazardous and non-hazardous waste: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer.	Green Infinity
	Key performance indicator A1.1	The types of emissions and respective emissions data.	Green Infinity
	Key performance indicator A1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Green Infinity
	Key performance indicator A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Green Infinity
	Key performance indicator A1.5	Description of emission target(s) set and steps taken to achieve them.	Green Infinity
	Key performance indicator A1.6	Description of the methods for handling hazardous and non-hazardous waste, and description of the waste reduction targets set and steps taken to achieve them.	Green Infinity
A2: Use of resources	General disclosure	The policies on the efficient use of resources, including energy, water and other raw materials.	Green Infinity
	Key performance indicator A2.1	Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per unit of production volume, per facility).	Green Infinity
	Key performance indicator A2.2	Water consumption in total and intensity (e.g. per unit of production volume, per facility).	Green Infinity
	Key performance indicator A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them.	Green Infinity
A2: Use of resources	Key performance indicator A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.	Green Infinity
	Key performance indicator A2.5	Total packaging materials used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	Green Infinity
A3: The environment and natural resources	General disclosure	The policies on minimizing the issuer's significant impacts on the environment and natural resources.	Green Infinity
	Key performance indicator A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	Green Infinity
A4: Climate change	General disclosure	The policies for identifying and responding to significant climate-related issues that have had, and may have, an impact on the issuer.	Green Infinity
	Key performance indicator A4.1	Description of the significant climate-related issues that have had, and may have, an impact on the issuer, and the response actions.	Green Infinity
Social			
B1: Employment	General disclosure	Information on remuneration and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other compensation and benefits: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer.	Talent Infinity
	Key performance indicator B1.1	Total workforce by gender, employment type (for example, full- or part-time), age group and geographical region.	Talent Infinity
	Key performance indicator B1.2	Employee turnover rate by gender, age group and geographical region.	Talent Infinity

Environmental, Social and Governance Subject Area, General Disclosures and KPIs			Section
B2: Health and safety	General disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer.	Talent Infinity
	Key performance indicator B2.1	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	Talent Infinity
	Key performance indicator B2.2	Lost days due to work injury.	Talent Infinity
	Key performance indicator B2.3	Description of occupational health and safety measures adopted, and how they are implemented and monitored.	Talent Infinity
B3: Development and training	General disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	Talent Infinity
	Key performance indicator B3.1	The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	Talent Infinity
	Key performance indicator B3.2	The average training hours completed per employee by gender and employee category.	Talent Infinity
B4: Labor standards	General disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer.	Talent Infinity
	Key performance indicator B4.1	Description of measures to review employment practices to avoid child and forced labor.	Talent Infinity
	Key performance indicator B4.2	Description of steps taken to eliminate such practices when discovered.	Talent Infinity

Environmental, Social and Governance Subject Area, General Disclosures and KPIs			Section
B5: Supply chain management	General disclosure	Policies on managing environmental and social risks of the supply chain.	Value Infinity - Responsible Procurement
	Key performance indicator B5.1	Number of suppliers by geographical region.	Value Infinity - Responsible Procurement
	Key performance indicator B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	Value Infinity - Responsible Procurement
	Key performance indicator B5.3	Description of management for identifying environmental and social risks at each link of the supply chain, and how they are implemented and monitored.	Value Infinity - Responsible Procurement
	Key performance indicator B5.4	Description of practices used to promote the use of environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	Value Infinity - Responsible Procurement
B6: Product responsibility	General disclosure	Information on health and safety, advertising, labeling and privacy matters relating to products and services provided, and methods of redress: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer.	Tech Infinity
	Key performance indicator B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	Tech Infinity
	Key performance indicator B6.2	Number of products and service related complaints received and how they are dealt with.	Tech Infinity
	Key performance indicator B6.3	Description of practices relating to observing and protecting intellectual property rights.	Tech Infinity
	Key performance indicator B6.4	Description of quality assurance process and recall procedures.	Tech Infinity
	Key performance indicator B6.5	Description of consumer data protection and privacy policies, and how they are implemented and monitored.	Tech Infinity

Environmental, Social and Governance Subject Area, General Disclosures and KPIs			Section
B7: Anti-corruption	General disclosure	Information on the prevention of bribery, extortion, fraud and money laundering: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer.	Value Infinity - Business Ethics
	Key performance indicator B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	Value Infinity - Business Ethics
	Key performance indicator B7.2	Description of preventive measures and whistle-blowing procedures, and how they are implemented and monitored.	Value Infinity - Business Ethics
	Key performance indicator B7.3	Description of anti-corruption training provided to directors and staff.	Value Infinity - Business Ethics
B8: Community investment	General disclosure	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	Value Infinity – Community Co-development
	Key performance indicator B8.1	Focus areas of contribution (e.g. education, environmental concerns, labor needs, health, culture, sport).	Value Infinity – Community Co-development
	Key performance indicator B8.2	Resources contributed (e.g. money or time) to the focus area.	Value Infinity – Community Co-development
Value D: Climate-Related Disclosures			
Governance		Governance	Green Infinity
Strategy		Climate-related risks and opportunities	Green Infinity
		Business model and value chain	Green Infinity
		Strategy and decision-making	Green Infinity
Strategy		Financial position, financial performance and cash flows	Green Infinity
		Climate resilience	Green Infinity
Risk Management		Risk management	Green Infinity
Metrics and Targets		Greenhouse gas emissions	Green Infinity
		Climate-related transition risks	Green Infinity
		Climate-related physical risks	Green Infinity
		Climate-related opportunities	Green Infinity
		Capital deployment	Green Infinity
		Internal carbon prices	Green Infinity
		Remuneration	Decoding Low-Carbon: GCL Technology's Green DNA Empowering Global Energy Transition
		Industry-based metrics	Green Infinity
		Climate-related targets	Green Infinity
		Applicability of cross-industry metrics and industry-based metrics	Green Infinity

GRI Index

Instructions	GCL Technology reported the information cited in this GRI content index with reference to the GRI Standards for the period from January 1, 2025 to December 31, 2025
GRI 1 used	GRI 1: Basics 2021

Disclosed Issue/ Item	Description	Section in This Report
GRI 2: General Disclosure 2021		
Organization and Its Reporting		
2-1	Organizational details	About GCL Technology
2-2	Entities included in an organization's sustainability report	About This Report
2-3	Reporting period, frequency and contact point	About This Report
2-4	Restatements of information	About This Report
Activities and Workers		
2-6	Activities, value chain and other business relationships	About GCL Technology
2-7	Employees	Talent Infinity
2-8	Workers who are not employees	Value Infinity-Responsible Procurement
Governance		
2-9	Governance structure and composition	Value Infinity-Sound Operations
2-10	Nomination and selection of the highest governance body	Value Infinity-Sound Operations
2-11	Chairman of the highest governance body	Value Infinity-Sound Operations
2-12	The role of the highest governance body in overseeing the management of impacts	Value Infinity-Sound Operations
2-13	Delegation of responsibility for managing impacts	Value Infinity-Sound Operations
2-14	Role of the highest governance body in sustainability reporting	Value Infinity-Sound Operations
2-16	Communication of critical concerns	ESG Philosophy and Governance - Stakeholder Engagement
2-17	Collective knowledge of the highest governance body	Value Infinity-Sound Operations
2-19	Remuneration policies	Value Infinity-Sound Operations
Strategy, Policies and Practices		
2-22	Statement on sustainable development strategy	ESG Philosophy and Governance - ESG Governance and Management
2-23	Policy commitments	ESG Philosophy and Governance - ESG Governance and Management
2-25	Processes to remediate negative impacts	ESG Philosophy and Governance - Stakeholder Engagement
2-26	Mechanisms for seeking advice and raising concerns	ESG Philosophy and Governance - Stakeholder Engagement
2-27	Compliance with laws and regulations	Value Infinity-Sound Operations
Stakeholder Engagement		
2-29	Approach to stakeholder engagement	ESG Philosophy and Governance - Stakeholder Engagement
GRI 3: Material Topics 2021		
3-1	Process to determine material topics	ESG Philosophy and Governance - Stakeholder Engagement
3-2	List of material topics	ESG Philosophy and Governance - Stakeholder Engagement
3-3	Management of material topics	ESG Philosophy and Governance - Stakeholder Engagement
Economy		
GRI 201: Economic Performance		
201-2	Financial implications and other risks and opportunities due to climate change	Green Infinity-Climate Change
201-3	Defined benefit plan obligations and other retirement plans	Talent Infinity-Talent Attraction and Retention
GRI 205: Anti-Corruption		
205-1	Operational sites where corruption risk assessments have been conducted	Value Infinity-Sound Operations
205-2	Communication and training about anti-corruption policies and procedures	Value Infinity-Sound Operations
205-3	Confirmed incidents of corruption and actions taken	Value Infinity-Sound Operations

Disclosed Issue/ Item	Description	Section in This Report
GRI 206: Anti-Competitive Behavior 2016		
206-1	Legal actions for all anti-competitive behavior, anti-trust, and monopoly practices	Value Infinity-Sound Operations
Environmental		
GRI 101: Biodiversity 2024		
101-1	Policies to halt and reverse biodiversity loss	/
101-2	Management of biodiversity impacts	Green Infinity- Ecological Protection
101-3	Access and benefit-sharing	/
101-4	Identification of biodiversity impacts	/
101-5	Locations with biodiversity impacts	/
101-6	Direct drivers of biodiversity loss	/
101-7	Changes to the state of biodiversity	/
101-8	Ecosystem services	Green Infinity -Ecological Protection
GRI 302: Energy 2016		
302-1	Energy consumption within the organization	Green Infinity -Energy Management
302-2	Energy consumption outside of the organization	Green Infinity -Energy Management
302-3	Energy intensity	Green Infinity -Energy Management
302-4	Reduction of energy consumption	Green Infinity -Energy Management
302-5	Reductions in energy requirements of products and services	Green Infinity -Energy Management
GRI 303: Water and Effluents 2018		
303-1	Interactions with water as a shared resource	Green Infinity -Water Resource Management
303-2	Management of water discharge-related impacts	Green Infinity -Water Resource Management
303-3	Water withdrawal	Green Infinity -Water Resource Management
303-4	Water discharge	Green Infinity -Water Resource Management
303-5	Water consumption	Green Infinity -Water Resource Management

Disclosed Issue/ Item	Description	Section in This Report
GRI 304: Biodiversity 2016		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	Green Infinity -Ecological Protection
304-2	Significant impacts of activities, products and services on biodiversity	Green Infinity -Ecological Protection
304-3	Habitat protected or restored	
GRI 305: Emissions 2016		
305-1	Direct (Scope 1) greenhouse gas emissions	Green Infinity -Metrics and Targets
305-2	Energy indirect (Scope 2) GHG emissions	Green Infinity -Metrics and Targets
305-3	Other indirect (Scope 3) GHG emissions	Green Infinity -Metrics and Targets
305-4	GHG emissions intensity	Green Infinity -Metrics and Targets
305-5	Reduction of GHG emissions	Green Infinity -Metrics and Targets
305-7	Nitrogen oxides (NO_x), sulfur oxides (SO_x), and other significant air emissions	Green Infinity -Waste Management
GRI 306: Waste		
306-1	Waste generation and significant waste-related impacts	Green Infinity -Waste Management
306-2	Management of significant waste-related impacts	Green Infinity -Waste Management
306-3	Waste generated	Green Infinity -Waste Management
306-4	Waste diverted from disposal	Green Infinity -Waste Management
306-5	Waste directed to disposal	Green Infinity -Waste Management
GRI 308: Supplier Environmental Assessment		
308-1	New suppliers that were screened using environmental criteria	Value Infinity – Responsible Procurement
308-2	Negative environmental impacts in the supply chain and actions taken	Value Infinity – Responsible Procurement
Social		
GRI 401: Employment		
401-1	New employee hires and employee turnover	Talent Infinity-Talent Attraction and Retention

Disclosed Issue/ Item	Description	Section in This Report
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Talent Infinity-Talent Attraction and Retention
401-3	Parental leave	Talent Infinity-Talent Attraction and Retention
GRI 403: Occupational Health and Safety		
403-1	Occupational health and safety management system	Talent Infinity-Health and Safety
403-2	Hazard identification, risk assessment, and incident investigation	Talent Infinity-Health and Safety
403-3	Occupational health services	Talent Infinity-Health and Safety
403-4	Worker participation, consultation, and communication on occupational health and safety	Talent Infinity-Health and Safety
403-5	Worker training on occupational health and safety	Talent Infinity-Health and Safety
403-6	Promotion of worker health	Talent Infinity-Health and Safety
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Talent Infinity-Health and Safety
403-8	Workers covered by an occupational health and safety management system	Talent Infinity-Health and Safety
403-9	Work-related injuries	Talent Infinity-Health and Safety
403-10	Work-related ill health	Talent Infinity-Health and Safety
GRI 404: Training and Education		
404-1	Average hours of training per year per employee	Talent Infinity-Talent Cultivation and Development
404-2	Programs for upgrading employee skills and transition assistance programs	Talent Infinity-Talent Cultivation and Development
404-3	Percentage of employees receiving regular performance and career development reviews	Talent Infinity-Talent Cultivation and Development
GRI 405: Diversity and Equal Opportunity		
405-1	Diversity of governance bodies and employees	Talent Infinity-Diversity and Inclusion, Value Infinity-Sound Operations
GRI 406: Non-Discrimination		
406-1	Incidents of discrimination and corrective actions taken	Talent Infinity-Diversity and Inclusion

Disclosed Issue/ Item	Description	Section in This Report
GRI 407: Freedom of Association and Collective Bargaining		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Not Applicable
GRI 408: Child Labor		
408-1	Operations and suppliers at significant risk for incidents of child labor	Not Applicable
GRI 409: Forced or Compulsory Labor		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Not Applicable
GRI 413: Local Communities		
413-1	Operations with local community engagement, impact assessments, and development programs	Value Infinity – Community Co-development
GRI 414: Supplier Social Assessment		
414-1	New suppliers that were screened using social criteria	Value Infinity – Responsible Procurement
GRI 416: Customer Health and Safety		
416-1	Assessment of the health and safety impacts of product and service categories	Tech Infinity-Quality Enhancement
416-2	Non-compliance incidents concerning the health and safety impacts of products and services	Not Applicable
GRI 417: Marketing and Labeling		
417-1	Requirements for product and service information and labeling	Tech Infinity-Quality Enhancement
417-2	Incidents of non-compliance concerning product and service information and labeling	Not Applicable
417-3	Incidents of non-compliance concerning marketing communications	Not Applicable
GRI 418: Customer Privacy		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Not Applicable

Independent Verification Statement

ATTESTATION ◆ ATTESTATO ◆ ATTESTACIÓN ◆ BESCHEINIGUNG ◆ ATTESTATION

Independent Verification Statement

Verification Statement：EIV2 130542 0001 Rev. 00

To the management and stakeholders of GCL Technology Holdings Limited,

TÜV SÜD Certification and Testing (China) Co., Ltd. (hereinafter referred to as "TÜV SÜD") has been engaged by GCL Technology Holdings Limited (hereinafter referred to as "GCL Technology" or "the Company") to perform an independent third-party verification on its *2025 Environmental, Social, and Governance Report* (hereinafter referred to as "the Report"). During this verification, TÜV SÜD's verification team strictly abided by the contract signed with GCL Technology and provided verification regarding the Report in accordance with the provisions agreed by both parties and within the authorized scope stipulated in the contract.

This Independent Verification Statement is based on all the data and information collected by GCL Technology and provided to TÜV SÜD. The scope of verification is limited to the given data and information. GCL Technology shall be held accountable for the authenticity and completeness of the provided data and information (contains assumptions, projections, and/or historical facts).

Scope of Verification

Time frame of this verification:

- The Report contains the data disclosed by GCL Technology during the reporting period from January 1st, 2025 to December 31st, 2025, including environmental, social and governance data and information, methods for management of material issues, actions/measures and the Company's sustainability performance during the reporting period.

Physical boundary of this verification:

- The on-site verification sampling took place at below listed location:
GCL Energy Center, No.28, Xinqing Road, Suzhou Industrial Park, Jiangsu Province, China.

Scope of data and information for the verification:

- The scope of verification is limited to the data and information of GCL Technology and all companies under its operational control covered by the Report.
- Key metrics: Total GHG emission intensity per unit of product output (Scope 1 and 2), including Polysilicon GHG emission intensity (Scope 1 and 2), in tCO2e/ton of polysilicon; Wafer GHG emission intensity (Scope 1 and 2), in tCO2e/MW of wafers; and Total GHG emission intensity (Scope 1 and 2), in tCO2e/MW of wafers.

The following data and information are beyond the scope of this verification:

- Any relevant data and information beyond the reporting period;
- The data and information of GCL Technology's suppliers, partners and other third parties; and
- The financial data and information disclosed in the Report that has been audited by an independent third party are not verified again herein.

Limitations

- The verification process is conducted in the above scope. Sampling and verification are adopted for the data and information in the Report by TÜV SÜD, and only the stakeholders within the Company are interviewed; and

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TÜV SÜD Certification and Testing (China) Co., Ltd.
Floor 1-4, Building B, No.37, Tuanjie Road(Middle), Xishan Economic and Technological Development Zone, Wuxi, Jiangsu, P.R. China

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Independent Verification Statement

Verification Statement：EIV2 130542 0001 Rev. 00

- The Company's standpoint, opinions, forward-looking statements and predictive information as well as the historical data and information before January 1st, 2025, are beyond the scope of this verification.
- The verification conclusions are based on the analysis of the data and information collected by TÜV SÜD and may not identify all problems and conditions, nor constitute any guarantee of the credibility or status of the subject of verification.

Verification Methodology

This verification process was conducted by TÜV SÜD's expert team with extensive experience in environmental, social and governance and other relevant areas and drew the conclusions thereof. The verification conforms to the following requirements:

- *AA1000 Assurance Standard v3, Type 2, Moderate Assurance*
- *Sustainability Report Verification Operation Rule (CCB_EIV_GR_002E Rev04)*

In order to perform adequate verification in accordance with the contract and relevant assurance standards, and provide reliable verification for the conclusions, the verification team conducted the following activities:

- Preliminary investigation of the relevant information before on-site verification;
- Confirmation of the presence of the topics with high level of materiality and performance in the Report;
- On-site verification review of all supporting documents, data and other information provided by GCL Technology; tracing and verification of key performance information;
- Special interview with the representative of GCL Technology's management; and held interviews with the employees related to collection, compilation and reporting of the disclosed information; and
- Other procedures deemed necessary by the verification team.

Verification Conclusions

According to the verification, we believe that the data and information presented in GCL Technology's report are objective, factual and reliable, without systematic problems.

The verification team has drawn the following conclusions in this Report:

Inclusivity	GCL Technology has comprehensively identified its internal and external stakeholders, including customers, employees, shareholders and investors, suppliers and business partners, government and regulatory authorities, industry associations, communities and non-governmental organizations, media, as well as academic experts/scholars/professional organizations. The Company has established stakeholder engagement mechanisms to collect and understand stakeholders' needs and expectations.
Materiality	GCL Technology has established the identification and prioritization process of material topics determination, identified and assessed the priority of the sustainability topics which are highly related to the industry, and disclosed the governance structure, management approach as well as sustainability performance in corporate operation, therefore the Report's adherence to materiality principle is guaranteed.
Responsiveness	In response to stakeholder concerns, GCL Technology has clearly disclosed the management approaches and performance of its highly material topics, including Research and Innovation, Diversified Products, Strengthened Risk Control and Internal Governance, Climate Change Response, and Energy Management, and has established a communication mechanism, to fully respond to the demands and expectations of stakeholders.

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Impact	GCL Technology has established a three-tier ESG governance structure comprising the decision-making, supervisory, and execution levels. The Board of Directors, as the highest decision-making body for ESG, assumes ultimate responsibility for ESG strategy, targets, and performance. An ESG Committee has been established at the Board level to coordinate, oversee, and guide the Company's overall sustainability efforts. The Company has implemented a process of certain high material topics impact assessment, based on a comprehensive and balanced understanding, it has measured the impacts of these topics on stakeholders and the organization itself, and disclosed relevant impact in the Report to an appropriate extent.

Recommendations on Continuous Improvement

- The verification team has passed the improvement proposal to the management of GCL Technology during the on-site verification process.

Statement on Independence and Verification Capability

TÜV SÜD is a trusted partner of choice for safety, security and sustainability solutions. It specializes in testing, certification, auditing and advisory services. Since 1866, the company has remained committed to its purpose of enabling progress by protecting people, the environment and assets from technology-related risks. Today, TÜV SÜD is present in over 1,000 locations worldwide with its headquarters in Munich, Germany. Through expert teams represented by more than 28,000 employees, it adds value to customers and partners by enabling market access and managing risks. By anticipating technological developments and facilitating change, TÜV SÜD inspires trust in a physical and digital world to create a safer and more sustainable future.

TÜV SÜD Certification and Testing (China) Co., Ltd is one of TÜV SÜD's global branches and has an expert team whose members have professional background and rich industrial experiences.

TÜV SÜD and GCL Technology are two entities independent of each other and both TÜV SÜD and GCL Technology and their branches or stakeholders have no conflict of interest. No member of the verification team has business relationship with the Company. The verification is completely neutral. All the data and information in the Report are provided by GCL Technology. TÜV SÜD has not been involved in preparation and drafting of the Report, except for the verification itself and issuance of this Independent Verification Statement.

Signature:

AA1000
Licensed Report
000-437/V3-26A60

On Behalf of TÜV SÜD Certification and Testing (China) Co., Ltd.

Wenjun Zhu
TÜV SÜD Certification and Testing (China) Co., Ltd. Technical Certifier
Shanghai, China, April 20th, 2026

Note: In case of any inconsistency or discrepancy, the simplified Chinese version "Independent Verification Statement" of this verification statement shall prevail, while the English translation is used for reference only.

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Your Feedback

Dear reader,

Thank you very much for reading *GCL Technology Holdings Limited 2025 ESG Report*. We highly value your opinions on the report. To promote the enhancement and improvement of our work in environment, society, and governance, we kindly invite you to provide your comments and suggestions on this report and share your feedback with us, so that we can continuously improve the report.

1. What is your overall impression of this report?
   ○ Very good ○ Good ○ Fair ○ Poor

2. How would you rate the clarity, accuracy and completeness of the information and data disclosed in this report?
   ○ Very good ○ Good ○ Fair ○ Poor

3. How do you assess the comprehensiveness with which this report reflects the environmental responsibilities undertaken by the Group?
   ○ Very good ○ Good ○ Fair ○ Poor

4. How do you assess the comprehensiveness with which this report reflects the social responsibility undertaken by the group?
   ○ Very good ○ Good ○ Fair ○ Poor

5. How do you assess the comprehensiveness of this report in reflecting the governance responsibilities undertaken by the Group?
   ○ Very good ○ Good ○ Fair ○ Poor

6. Do you think the report's design and layout facilitates reading convenience?
   ○ Very good ○ Good ○ Fair ○ Poor

7. In your opinion, what content in this report requires the most improvement?
   ○ environment ○ society ○ governance ○ safety ○ employees ○ supply chain

8. Are there any topics you hoped to see in this report but were not covered? (Please specify):

9. Do you have any comments or suggestions regarding the Group's environmental, social, and governance efforts or the preparation of this report:

How to submit your feedback:

1. For digital feedback, please scan the QR code on the right
2. For hard copy feedback, please mail the "Reader feedback" form to Xinqing Road, Suzhou Industrial Park, Suzhou, Jiangsu Province, China No. 28, GCL Energy Center, Sustainable Development Center of GCL Technology Holdings Limited


GCL