

Conflict Minerals Management Policy (Firstly formulated July 2024, Revised March 2025)

Introduction

"Conflict minerals" generally refer to minerals originating from conflict-affected and high-risk areas (CAHRA), including but not limited to tantalum, tin, tungsten, gold (collectively referred to as "3TG"), etc. The mining and trade of such minerals involve risks of triggering conflicts, harming human rights, and causing instability. JA Solar Technology Co., Ltd. and its subsidiaries (hereinafter referred to as "**JA Solar**" or "**we**") are committed to ethical business practices and practicing responsible sourcing principles in the global supply chain. Although JA Solar does not mine or procure minerals directly, we recognize our responsibility to respect human rights and avoid mineral procurement activities that contribute to conflicts. Therefore, we are working hard with global supply chain partners to ensure the use of responsible mineral resources in the industrial chain.

Our Commitment

JA Solar is committed to promoting responsible mineral sourcing and trading to mitigate the adverse impacts of conflict minerals on human rights, the environment and the societies of the relevant regions. JA Solar pledges zero tolerance for, and will not in any way support or assist, any mineral sourcing or trading activities that may exacerbate conflicts, cause serious environmental degradation or undermine human rights—nor will we profit from such activities. JA Solar promises to develop and implement our supply chain policies and due diligence procedures in accordance with the *Chinese Due Diligence Guidelines for Mineral Supply Chain* (hereinafter referred to as the "**Chinese Mineral Guidelines**"), and with reference to the *United Nations Guiding Principles on Business and Human Rights*, the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and*

High-Risk Areas (hereinafter referred to as the "**OECD Guidelines**"), the Responsible Minerals Initiative ("**RMI**"), and other relevant industry initiatives, standards, and JA Solar's own policies .

Through the *JA Solar Supplier Code of Conduct*, we extend these values and compliance requirements to our suppliers, and incorporate them into contracts and/or agreements with our suppliers. We require suppliers whose products contain 3TGs to commit that these materials come from environmentally and socially responsible sources. We encourage our suppliers to source materials, directly or indirectly, from smelters and refiners verified by accredited third-party audit programs, and to cooperate with us in implementing due diligence.

Release Statement

This policy was approved and effective by Company's Compliance and Internal Control Management Committee.

Our Due Diligence Program

- **Establishment of Management System:** JA Solar has established a conflict minerals policy, due diligence procedures and safeguard measures, and has assigned relevant responsibilities to internal personnel. JA Solar also encourages our suppliers to develop appropriate management systems, formulate and enforce their own conflict minerals policies, to implement due diligence in accordance with the Chinese Mineral Guidelines and OECD Guidelines and other applicable international standards, and communicate their policies to upstream suppliers. JA Solar will provide relevant trainings for internal employees and external suppliers, to ensure that our policies are fully understood, and help suppliers enhance their due diligence capabilities.
- **Risk Identification and Assessment:** JA Solar regularly identifies and assesses our supply chain to identify risks of adverse impacts associated with conflict minerals. We conduct risk assessments on direct suppliers, and require suppliers of raw materials containing 3TGs and other relevant minerals to submit the

RMI's CMRT/EMRT and related documents to JA Solar on an annual basis, or provide audits and certification results from qualified third parties. Upon receipt, we strictly review and verify the submitted information, and confirm the RMAP certification status of its upstream smelters/refiners simultaneously. When necessary, we may request the smelters/refiners to obtain relevant certifications. Finally, based on the results of due diligence procedures, the origin of mineral shall be traced to determine the country of origin through comprehensive analysis of supplier information and certification status. This process enables effective identification and assessment of risks associated with adverse impacts related to conflict minerals, thereby ensuring the responsibility and sustainability of the supply chain.

- **Risk Mitigation:** Based on supplier due diligence management and risk assessment outcomes, JA Solar designs and implements strategies to address identified risks. We require suppliers to sign the *Conflict Minerals Statement* and comply with JA Solar's requirements on conflict minerals. Should any risks associated with conflict minerals be detected, JA Solar will mandate the supplier to promptly submit a detailed remediation plan and take appropriate measures to mitigate associated risks. In cases where suppliers refuse to implement corrective actions, fail to complete effective remediation within stipulated timelines, or decline to provide relevant information, JA Solar reserve the right to suspend or terminate business relationships with the supplier.
- **Audits and Reviews:** JA Solar may require certain suppliers to undergo third-party independent audits. JA Solar will also periodically review our policies and procedures while continuously improving our responsible supply chain management practices.
- **Reporting and Transparency:** JA Solar committed to continuously enhancing supply chain transparency and will regularly disclose our mineral supply chain due diligence policies and practices.

Complaints Mechanism

JA Solar has established a grievance mechanism to enable employees and external stakeholders to raise any concerns or issues related to our responsible sourcing practices. All grievances will be addressed in compliance with applicable laws and regulations objectively and impartially, while ensuring protection of complainants and/or whistleblowers against any form of retaliation.

Stakeholders can contact us via the following methods:

1. JA Solar's official website - [SpeakUp](#) platform or "[Integrity JA Solar](#)" column

2. Tel: +86-10-63611911

3. WeChat Public Account: LianJieJA, or scan the QR code on the right to access



4. Email: antifraud@jasolar.com

5. QQ: 3476840246

5. Mailing address: JA Solar Audit and Supervision Center (received)

No. 8 Nuode Center, Automobile Museum East Road, Fengtai District, Beijing, China

Zip code: 100160

6. Scan the QR code below to report directly



Through collaborative efforts with our suppliers, contractors and industry partners, JA Solar is committed to continuously improving our responsible sourcing practices and making positive contributions to the social and economic development of the regions from which we source minerals.

Yang Aiqing



President of JA Solar Technology Co., LTD