

**JA Solar**  
**Responsible Sourcing Policy**  
**(Firstly formulated May 2024, Revised January 2026)**

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## 1. Introduction

Cooperation with suppliers based on responsible sourcing is key to achieving a strong and reliable supply chain. It helps reduce risk for all parties involved and creates trust among customers and stakeholders that depend on JA Solar and its suppliers daily.

At JA Solar, we take pride in relationships which are founded on the principles of mutual respect, cooperation, and collaboration. On this basis, we are devoted to continuing work with each of our suppliers to ensure a sustainable and successful future for all parties involved. JA Solar is committed to responsible sourcing, and we expect the same from our suppliers.

This Responsible Sourcing Policy (hereinafter referred to as the “**Policy**”) sets out the requirements for the sustainable procurement of goods and services and the supply chain due diligence management system. We firmly believe that this is a common journey for JA Solar and its suppliers, and we are bound to contribute to a better future for all.

## **2. Purpose and Scope of Application**

The purpose of this Policy is to ensure ethical, legal and sustainable procurement of products and services. This Policy applies to JA Solar Technology Co., Ltd. and all of its subsidiaries and production bases (collectively “**JA Solar**”), as well as all of its directors, officers, employees, agents and contractors, should be subject to this Policy in the course of procurement activities relating to its products and services.

By following this Policy, we aim to ensure compliance with all applicable domestic and international laws and regulations related to supply chain due diligence management and compliance, and to communicate equivalent requirements to our supply chain partners. JA Solar is committed to applying relevant standards, such as the OECD Due Diligence Guidance for Responsible Business Conduct, Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and the United Nations Guiding Principles on Business and Human Rights, to its procurement practices. In implementing the supply chain due diligence, we aim to identify, prevent, mitigate, bring to an end and remediate potential and actual adverse impacts on labor, human rights, environment, health and safety.

As a corporate citizen, we seek to act with integrity and honesty by actively responding to the concerns of our stakeholders, proactively identifying and addressing relevant issues across the areas of environment, society and governance (collectively referred to as “**ESG**”).

JA Solar will regularly update this Policy in accordance with the outcomes of the Policy’s implementation and, more generally, JA Solar ’s due diligence processes, updates to legislation or guidance, and with due consideration of relevant information from stakeholders.

## **3. Release Statement**

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

#### 4. Our Requirements for Suppliers

At JA Solar, we strive to conduct our business with integrity and honesty in a legal, compliant, and sustainable manner. We attach great importance to the management of human rights and environmental risks in our supply chain and require all suppliers to strictly comply with applicable local and international laws and regulations, the JA Solar Supplier Code of Conduct (hereinafter referred to as the “**Supplier Code**”) and other relevant compliance requirements of JA Solar.

We require suppliers to carry out their activities with respect and dignity for all human beings. This includes, but is not limited to the following requirements: prohibiting forced labor and any other form of involuntary labor, human trafficking and slavery; prohibiting the use of child labor and protecting underage workers; conducting responsible mineral sourcing and promoting supply chain traceability for critical mineral materials such as tin, tungsten, tantalum, gold, cobalt, mica, and silicon (if applicable); ensuring health and safety; ensuring labor compliance; non-discrimination and fair treatment; respecting freedom of association and collective bargaining; anti-bribery and corruption; identifying and compliantly managing hazardous substances.

We are committed to minimizing the adverse environmental impacts associated with the acquisition and use of raw materials. We encourage suppliers to continuously reduce greenhouse gas emissions, water consumption, energy consumption and waste generation during production and procurement, and actively promote resource recycling and environmental sustainability.

Suppliers shall establish a robust management system to identify and prevent potential human rights and environmental risks in their operations and supply chains, ensuring compliance, transparency, and traceability throughout the process, and jointly promoting responsible management and sustainable development of the supply chain.

For more detailed requirements, please refer to the Supplier Code.

## **5. Supply Chain Due Diligence Management System**

As stated, we believe in a strong relationship with our suppliers as a successful basis for continuous improvement. We support and collaborate with our suppliers on their ESG journey from good practice to best practice through trainings, sharing best practices, improving processes and providing templates.

JA Solar has established a comprehensive risk-based due diligence system to identify and address key risks in the supply chain, from pre-screening, selection, onboarding, ESG risk and performance monitoring, to disengagement in the cases of severe non-compliance. We also allocate sufficient resources and define clear roles and responsibilities within JA Solar to ensure the proper functioning of this Policy and the achievement of the/its underlying objectives...

JA Solar's supplier due diligence management system mainly includes the following processes:

### **5.1. Communication of Compliance Requirements in the Supply Chain**

To promote supply chain compliance and sustainable development, and to communicate JA Solar's compliance requirements to suppliers, JA Solar has developed documents such as the Supplier Code. The Supplier Code primarily outlines compliance requirements in areas such as labor and human rights, health and safety, environmental responsibility, business ethics, and management systems.

All suppliers are required to sign and comply with the Supplier Code. In addition, JA Solar requires suppliers to take effective measures to cascade equivalent compliance requirements throughout their upstream supply chains.

### **5.2. Supply Chain Map**

JA Solar develops the supply chain map to identify the scope of the supply chain, providing a basis for risk prioritization. The supply chain map includes information such as the type of products or services supplied, the geographic location of the supplier, and the categories

of suppliers. For products containing critical mineral materials, we require suppliers to provide information on the mineral origin and the complete supply chain.

### **5.3. Risk Prioritization**

JA Solar focuses on establishing or maintaining business relationships with suppliers with solid ESG compliance and due diligence performance. JA Solar uses risk screening, self-assessment questionnaires and other tools to prioritize risks within the supply chain.

#### **5.3.1. Risk Screening**

JA Solar's risk screening of potential and existing suppliers is a preliminary assessment based on risk indicators such as enterprise-level, sector, product, and geographic risks, as well as supplier classification and the nature of business interactions. This initial risk assessment aims to determine risk priorities and identify suppliers that require priority attention. Suppliers should provide relevant information and documents in a timely manner to support the risk screening process.

All suppliers of priority concern (including existing and potential suppliers) are required to complete the self-assessment questionnaire to facilitate JA Solar to conduct enhanced due diligence and further assessment processes.

#### **5.3.2. Self-Assessment Questionnaire**

Suppliers of priority concern should promptly complete the self-assessment questionnaire covering compliance issues in areas such as labor and human rights, occupational health and safety, environment, and management systems.

JA Solar further evaluates the human rights and environmental risks of its suppliers and whether their risk management measures are adequate, and classifies them into low-risk, medium-risk or high-risk categories.

For compliance risk identified through the assessment, suppliers should proactively carry out rectifications and develop risk mitigation plans based on self-assessment results, relevant compliance requirements, their own operating conditions, business scale and other

factors, especially in the continuous improvement and enhancement of corporate management systems, as well as in strengthening their human rights and environmental risk management capabilities and performance. Suppliers should proactively communicate with JA Solar regarding their risk mitigation plans, as well as the effectiveness and progress of corrective actions.

For suppliers classified as medium / high risk, an on-site audit should be conducted.

#### **5.4. On-Site Audits and Audit Findings**

On-site audits will be conducted by JA Solar or independent third-party auditors/organizations and may include unannounced inspections. The audit methods primarily include document review, facility tours, and employee interviews. The audit scope covers whether the supplier violates the Supplier Code, applicable laws and regulations on labor and human rights, health and safety, and the environment, and whether there are any potential or actual related adverse impacts.

Suppliers with no non-conformities found during the on-site audit will be reclassified as **low-risk suppliers**. Suppliers found to have non-conformities but are able to make timely corrections and effectively eliminate potential or actual adverse impacts (if any) will also be reclassified as **low-risk suppliers**.

Non-conformities found in the audit are categorized as follows:

- **Major Non-Conformities**: Violations of applicable mandatory laws, regulations, or standards resulting in potential or actual adverse impacts on the environment and human rights; absence of necessary management systems—failure to establish and implement relevant risk control systems.
- **Minor Non-Conformities**: Non-systemic, correctable issues with limited impact on environmental and human rights compliance, typically involving policy implementation deviations or isolated incidents.

- **Observations**: Issues that do not constitute non-conformities but present potential risks or areas for improvement, which may affect future compliance performance. Suppliers are advised to address these in their continuous improvement plans.

### **5.5. Corrective Action Plan and Implementation**

After the audit, JA Solar or its authorized third-party auditors/organizations will provide the suppliers with a list of identified non-conformities. The audited suppliers must provide JA Solar with a detailed corrective action plan within one month after receiving the list, outlining the corrective measures, root causes, responsible persons, and deadlines for implementation

JA Solar will review the corrective action plan and continue to monitor the implementation of the rectification to ensure that potential or actual adverse effects are effectively addressed. Follow-up audits may be conducted through on-site audits or remote verification of corrective evidence. In addition, JA Solar will maintain engagement with affected stakeholders and monitor the improvement of adverse impacts.

### **5.6. Responsible Disengagement**

JA Solar is committed to continuously improving human rights and environmental impacts within its supply chain, prioritizing collaboration and improvement measures. Disengagement from a business relationship is considered as a last resort. However, if a supplier is found to have committed the following **Severe Compliance Issues**, JA Solar may suspend or terminate the business relationship. JA Solar follows the principle of responsible disengagement and will assess whether such disengagement could cause or worsen adverse impacts on human rights or the environment before making a final decision.

**Severe Compliance Issues** include but are not limited to:

- The supplier refuses to cooperate (e.g., denying prompt access to auditors, refuses to provide relevant operational information, refuses to implement a corrective action plan);

- The supplier is found to have intentionally provided false, misleading or forged documents or information to JA Solar; and/or
- The supplier is found to have used child labor, engaged in any of the 11 forced labor indicators of the International Labor Organization (ILO), or caused severe safety or environmental incidents due to its activities.

### **5.7. Small and Medium-Sized Enterprises (SMEs)**

The allocation of responsibilities and the process definition, as well as the use of financial resources, may differ significantly depending on the size of and the resources available to the supplier. JA Solar fully understands the need to support small and medium-sized enterprises to fulfill our ESG compliance requirements.

(Any supplier review, due diligence, and audits undertaken within the scope of this Policy will be carried out in full compliance with relevant legislation, such as rules concerning confidentiality, antitrust, privacy and labor laws.)

## **6. Communication, Reporting and Training**

### **6.1. Stakeholder Communication and External Reporting**

JA Solar continues to communicate with stakeholders such as suppliers, workers in the supply chain, customers, investors or social organizations to understand their concerns and suggestions on supply chain due diligence, thereby continuously optimizing the due diligence management system and ensuring its efficient operation.

We firmly believe that increased transparency will result in improved supply chain sustainability and provide better protection for stakeholders. JA Solar regularly and publicly reports on progress and work undertaken within the scope of this Policy.

### **6.2. Awareness Raising and Training**

We will ensure that all relevant personnel of JA Solar that are responsible for dealing with JA Solar's suppliers have knowledge of:

- The contents of this Policy and JA Solar's relevant policies;
- The major requirements under relevant ESG and due diligence legislation;
- The contents of contractual clauses agreed with suppliers; and
- The contents of the due diligence framework established for managing suppliers set out in this Policy.

To this end, JA Solar organizes relevant trainings that are mandatory for relevant personnel dealing with JA Solar's suppliers.

In addition, to ensure that supply chain partners fully understand JA Solar's compliance requirements and expectations, JA Solar conducts dedicated capacity-building training and encourages partners to actively participate to jointly improve the compliance and sustainability of the entire supply chain.

## 7. Grievance Procedure

To ensure the strong compliance with the obligations outlined above, and specifically to be able to rely on an as wide as possible pool of information about our supply chain, JA Solar has put in place a developed grievance procedure. Through this complaints procedure, suppliers, affected persons, civil organizations, and any other interested parties can submit complaints to JA Solar, including in relation to its direct and indirect suppliers.

Our "SpeakUp" channel can be found on our website at [www.jasolar.com](http://www.jasolar.com) or accessed directly via <https://clean.jasolar.com/lz/>. All issues raised will be treated confidentially and information will only be shared with a limited number of people on a strict need-to-know basis and in line with applicable laws. JA Solar does not tolerate any form of retaliation, retribution, victimization or detriment as a result of using any of our reporting lines.

If any stakeholders have any questions or comments regarding the content and application of this Policy, please contact our specialists for more information. Please use [jacompliance@jasolar.com](mailto:jacompliance@jasolar.com) or other contact information available on our website.

## 8. Records Management

JA Solar systematically organizes, archives and properly retains relevant documents and information collected and generated during the supply chain due diligence process, in accordance with applicable laws and regulations. These records include, but are not limited to:

- Supplier-signed Supplier Code of Conduct, relevant compliance clauses in contracts, and other compliance statements;
- Risk assessment records;
- On-site audit report;
- Corrective action plans and evidence of subsequent correction.



Yang Ai Qing

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