

## **JA Solar Supplier Code of Conduct (First formulated May 2019, revised March 2025)**

### **1. Preface**

JA Solar has always upheld the corporate mission of "Developing solar power to benefit the planet" and the corporate motto of "To be an upstanding and responsible person and apply oneself with integrity and industry". Rooted in the new energy sector, JA Solar is committed to promoting the transformation and sustainable development of the global energy structure through continuous technological innovation and responsible business practices. A compliant, resilient and sustainable supply chain system is indispensable for achieving this goal. JA Solar seeks to work with its suppliers to jointly build such a system and to uphold standards of ethics, compliance, and sustainability throughout operations and supply chain management.

This Supplier Code of Conduct (hereinafter referred to as "**Code**") sets forth JA Solar's requirements for its suppliers, covering areas such as labor and human rights, health and safety, environmental responsibility, corporate governance and business ethics, management systems, and the implementation of this Code, with the aim of ensuring that JA Solar's cooperation with suppliers is based on compliance, mutual trust, transparency and shared values.

This Code applies to all suppliers and their representatives who provide products or services to JA Solar Technology Co., Ltd. and its subsidiaries within the scope of its consolidated financial statements (hereinafter referred to as "**JA Solar**" or "**we**"). The principles outlined in this Code are important considerations for us in selecting and evaluating suppliers. We require our suppliers to strictly comply with applicable laws and regulations and to adhere to the requirements of this Code. If there is a discrepancy between applicable laws and regulations and this Code, the stricter standard shall prevail.

JA Solar looks forward to working closely with its suppliers to implement the principles and requirements of this Code and to jointly promote sustainable development throughout the

supply chain. We believe that only through close cooperation can we fulfill our commitment to society, the environment and stakeholders.

This Code was approved and effective by Company's Compliance and Internal Control Management Committee. This Code will be updated in light of changes in laws and regulations and the expectations of stakeholders to ensure its continued effectiveness and relevance.



Yang Aiqing

President of JA Solar Technology Co., LTD

## **2. Labor and Human Rights**

### **2.1 Child and Underage Workers**

JA Solar maintains a zero-tolerance policy toward the use of child labor in any form. Suppliers shall not employ anyone below the minimum legal employment age as defined by the laws of the country/region where they operate. According to Chinese law, the minimum legal employment age is 16 years old; according to the standards of the International Labor Organization (ILO), it is generally 15 years old. Where permitted by applicable laws and regulations, if minors under the age of 18 are employed, suppliers must complete the required registration or obtain approval in accordance with local laws and must not assign such workers to any tasks that may jeopardize their health, safety or morals.

### **2.2 Forced Labor, Human Trafficking and Slavery**

Suppliers shall not engage in any form of forced labor, including but not limited to prison labor, human trafficking, slavery, imprisonment, indentured labor, or debt bondage. Suppliers shall not exploit employees through threats, coercion, intimidation, abduction or fraud. Employment must be voluntary, and employees shall have the freedom to resign. Suppliers shall not charge employees any recruitment, hiring or similar fees, and shall not withhold employees' identity documents, such as identification cards or work permits. Suppliers shall provide employees with labor contracts that are clear, understandable and in compliance with local labor laws and regulations. Suppliers shall also ensure that third-party labor agents or brokers comply with this Code and relevant laws and regulations.

### **2.3 Wages and Benefits**

Suppliers shall pay their employees in a timely manner with reasonable wages and benefits that at a minimum meet applicable legal requirements and basic living needs. Suppliers shall compensate employees for overtime work in accordance with local legal requirements. Deductions from wages as a disciplinary measure are not permitted.

### **2.4 Working Hours**

Suppliers shall comply with the laws and regulations regarding working hours in the countries/regions where they operate and shall not require their employees to work —

including regular and overtime hours—exceeding the maximum limits stipulated in local laws and regulations or relevant collective agreements. Overtime shall be voluntary and allow for reasonable rest time. Suppliers shall not punish or retaliate against employees for refusing or being unable to work overtime.

### **2.5 Anti-Discrimination and Fair Treatment**

Suppliers shall not discriminate against employees on the basis of race, color, nationality, ethnicity, gender, sexual orientation, religious beliefs, disability, age, political views, pregnancy, marital or family status, or any similar factors. Suppliers shall not require employees or applicants to undergo discriminatory medical examinations or tests. Suppliers shall provide employees with an equal, inclusive, and respectful working environment, free from all forms of harassment, discrimination, abuse, exploitation, or coercion, including sexual harassment. Employees shall enjoy the right lawfully to express their opinions.

### **2.6 Freedom of Association**

To the extent permitted by law, suppliers shall fully respect employees' rights to voluntarily establish, join or refrain from joining labor unions or similar lawful representative organizations, and their rights to participate in collective bargaining or negotiation. Employees shall not be subject to any form of punishment, harassment, intimidation or unfair treatment for exercising the above rights in a non-violent manner.

### **2.7 Community Engagement**

Suppliers should respect and support the development of the communities where they operate and maintain good communication with stakeholders and authorities in the local communities. Suppliers should consider the potential impact of their business activities on the community and take measures to prevent and mitigate adverse impacts on the local society, environment and economy, and avoid damaging the legitimate interests of community residents.

### **2.8 Responsible Minerals**

Suppliers should understand and comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third edition) and other equivalent guidelines, and formulate clear policies or procedures based on

the aforementioned guidelines and take appropriate measures to avoid using tin, tantalum, tungsten, gold (3TGs), and other relevant minerals, along with their derivatives, sourced from conflict-affected and high-risk areas in their manufactured products. Suppliers should conduct due diligence and ongoing monitoring on the sources of these minerals.

### **3. Health and Safety**

Suppliers shall provide healthy and safe working conditions and working environment for their employees, partners or other individuals affected by their management in accordance with international standards and national laws and regulations.

#### **3.1 Occupational Safety**

Suppliers shall establish a robust mechanism for health and safety risk assessment and prevention to accurately identify hazards, analyze and classify risks, and develop effective control measures to prevent accidents. When implementing prevention and control strategies, health and safety risks shall be managed according to the hierarchy of controls prioritizing elimination, substitution/mitigation, engineering and administrative controls, and provision of personal protective equipment (PPE). Qualified and properly trained personnel shall be engaged in the process. Safety equipment and tools should be provided and maintained, and employees should be equipped with and supervised to use personal protective equipment as required.

#### **3.2 Physically Demanding Work**

Suppliers shall continuously identify, assess, and control tasks involving high physical demands in accordance with applicable national and industry standards to ensure employees' health and safety are not compromised.

#### **3.3 Emergency Preparedness and Response**

Suppliers shall identify and plan for emergency situations, maintain, implement and improve emergency response systems accordingly. Employees shall receive training on emergency reporting, alarm systems, employee notification and evacuation procedures, drills, first-aid

supplies, fire detection and suppression systems, and unobstructed access to exit facilities.

### **3.4 Machine Maintenance**

Suppliers shall develop and implement a regular machine maintenance program and shall regularly conduct safety risk assessments on production and other types of equipment.

### **3.5 Sanitation and Housing**

Suppliers should provide workers with clean and easily accessible drinking water. If meals and food are provided, food sourcing and handling must comply with safety standards, and dining areas must be hygienic and well-maintained. If accommodation is provided to employees, the living environment must be clean, safe, reasonably spacious, and capable of meeting the basic living needs of employees (and their families, where applicable).

### **3.6 Special Requirements for Hazardous Materials**

Suppliers should comply with laws and regulations on the control of hazardous materials, and implement specific protective measures during transportation, storage, production, operation, use, and disposal to avoid environmental pollution accidents and safety incidents.

#### **3.6.1 Qualification and License Requirements**

Suppliers should establish safety management systems, such as ISO 45001, and obtain relevant certifications and licenses from competent authorities, such as hazardous materials production/operation permits, and strictly comply with their requirements. Special operations personnel must be appropriately certified. When supplier personnel are working at a third party's production or operation site, they must strictly comply with the third party's rules and regulations.

### **3.6.2 Hazardous Material Transport Standards**

Vehicles, drivers, and escort personnel used by suppliers for the transportation of hazardous goods should all have the required qualifications. Suppliers shall be responsible for safety during transportation and must provide necessary technical support—such as emergency response procedures and daily storage requirements—for personnel involved in the transport and its management.

## **4. Environmental Responsibility**

### **4.1 System Development**

Suppliers should comply with applicable environmental and ecological protection laws and regulations, and identify, assess and manage their substantial dependencies and impacts on environmental issues such as climate change and water resources.

### **4.2 Environmental Permits**

Suppliers shall obtain and maintain all required environmental permits (e.g., emission monitoring, discharge permits, transportation licenses), approvals and registrations.

### **4.3 Specific Substance Control**

Suppliers shall comply with all applicable laws and regulations concerning the prohibitions or restrictions of specific substances, identify and manage hazardous chemicals contained in materials, particularly those defined in the RoHS Directive and REACH Substances of Very High Concern (SVHC) lists, and take effective measures to prohibit or restrict the use of such specific substances.

### **4.4 Water Resources Management**

Suppliers should develop a water resource management plan to record, classify, monitor, assess, and manage water sources, usage and discharge. They shall identify methods to reduce water consumption and control pollution pathways. All wastewater should be categorized, monitored, controlled and treated as required before discharge or disposal. Suppliers should also regularly monitor the performance and compliance of wastewater treatment and

closed-loop systems to minimize adverse impacts on water resources.

#### **4.5 Waste Management**

Suppliers shall identify waste streams generated during their operations and adopt a circular economy approach by aiming to reduce, reuse, repair, recycle, recover or dispose of all waste in an environmentally responsible manner.

#### **4.6 Material Use**

Suppliers should strive to minimize the negative environmental impact associated with the sourcing and use of raw materials and shall identify and attempt to increase the proportion of recycled or renewable materials in their production processes.

#### **4.7 Greenhouse Gas and Energy Management**

Suppliers should set greenhouse gas (GHG) reduction targets and implement effective measures to lower greenhouse gas emissions. They should track, record, assess, and report energy consumption and Scope 1, 2, and 3 GHG emission, based on their targets. Suppliers are also expected to minimize energy consumption, conserve natural resources, and reduce GHG emissions. In addition, suppliers are encouraged to actively respond to the Science Based Targets initiative (SBTi), increase the share of green electricity usage, and actively explore management methods to mitigate their adverse impact on climate change.

#### **4.8 Biodiversity Conservation**

Suppliers shall comply with relevant laws and regulations on biodiversity conservation, explore biodiversity management practices, and avoid or minimize adverse impacts on protected areas (including World Heritage Sites) and highly protected areas (including wetlands), as well as any potential adverse impacts on biodiversity. Suppliers are encouraged to actively participate in ecological conservation initiatives.

## **5. Corporate Governance and Business Ethics**

### **5.1 Prohibition of Bribery and Corruption**

JA Solar will not tolerate any form of bribery and corruption. Suppliers shall comply with applicable anti-bribery and anti-corruption laws, and are prohibited from offering, accepting or soliciting bribes, kickbacks or any other improper benefits in any form. Suppliers shall not attempt to influence business decisions or obtain improper advantages through any means, including but not limited to cash or its equivalent, gifts, meals, entertainment or other benefits.

Suppliers shall establish and implement effective internal controls and compliance procedures to prevent corruption and bribery. If a supplier becomes aware of any suspected corruption or bribery conducted by JA Solar employees or representatives, they shall promptly report it to JA Solar.

### **5.2 Conflict of Interest**

Suppliers should avoid any conflicts of interest with JA Solar and its employees that could impair objective judgment or impartial conduct (e.g., familial relationships, equity partnerships, or other related interests between the supplier or its representatives and JA Solar employees). If suppliers discover any potential or actual conflicts of interest, they should immediately report to JA Solar and take appropriate measures, including but not limited to avoiding, disclosing or terminating the relevant interest relationship.

### **5.3 Data Compliance and Privacy Protection**

Suppliers shall comply with all applicable data protection and privacy laws and regulations when collecting, processing, storing, transmitting, or sharing personal data and other sensitive information. Suppliers shall implement necessary technical and organizational measures to ensure the security and confidentiality of personal data and to prevent unauthorized access or use of such data. In cases involving third-party data processing, suppliers shall conduct appropriate review on their subcontractors or partners to ensure that they comply with applicable data protection obligations.

### **5.4 Intellectual Property**

Suppliers shall take all reasonable measures to properly protect JA Solar 's intellectual property rights and business confidential information they may access during the course of cooperation. In addition, suppliers shall respect the intellectual property rights of JA Solar and other partner companies or individuals, and shall not infringe or improperly use JA Solar 's trademarks, patents or other intellectual property rights in any form.

### **5.5 Antitrust and Fair Competition**

Suppliers shall comply with all applicable antitrust and anti-unfair competition laws and regulations and participate in market competition in a fair and transparent manner. Suppliers shall not engage in illegal activities such as price-fixing, market division, output restrictions, restraints on competition, or false advertising to gain unfair competitive advantage or disrupt fair market order.

### **5.6 Trade Controls and Sanctions**

Suppliers shall comply with all applicable trade control and economic sanctions laws and regulations. Suppliers shall not, directly or indirectly, engage in any conduct that violates applicable trade control and economic sanctions laws and regulations.

### **5.7 Anti-money Laundering and Counter-Terrorism**

Suppliers shall ensure that their business operations comply with all applicable Anti-Money Laundering (AML) and Counter-Terrorism Financing (CFT) laws and regulations. Suppliers shall not, directly or indirectly, engage in any form of money laundering, terrorist financing or other illegal financial activities, and shall take all reasonable measures to prevent their funds from being used for illegal purposes.

### **5.8 Supply Chain Traceability**

Suppliers should, in accordance with JA Solar's requirements, provide clear traceability records, evidence, reports, and on-site audit access regarding the complete supply chain of raw materials and products supplied to JA Solar, in order to help JA Solar's products meet the requirements of applicable laws and regulations on supply chain traceability and integrity to the greatest extent possible.

## **6. Management System**

Suppliers shall establish, implement, maintain and continuously improve a management system to ensure that the measures they take are effective and in compliance with this Code and applicable laws and regulations. All applicable aspects of this Code shall be incorporated into the supplier's management system. The management system shall support suppliers in continuously improving their business practices, enhancing compliance and sustainability, and effectively identifying and managing related risks.

### **6.1 Management Accountability and Responsibility**

Suppliers shall designate management-level or senior representatives responsible for implementing management systems and programs, and for monitoring compliance with applicable laws and this Code. Senior management shall regularly review and evaluate the quality and effectiveness of management systems and programs.

### **6.2 Risk Management**

Suppliers shall have a process in place to identify risks related to labor, human rights, environment, health and safety, business ethics and compliance that are associated with their operations. In addition, suppliers shall develop and implement appropriate procedures to control identified risks and ensure compliance.

### **6.3 Sustainable Supply Chain and Due Diligence**

Suppliers shall promote compliance with the standards and requirements contained in this Code by their upstream suppliers and subcontractors. Suppliers shall establish and implement supply chain due diligence mechanisms commensurate with their business scale, impact and risks to identify, assess, manage and remedy potential or actual risks and adverse impacts related to labor, human rights, environment and business ethics in the supply chain. Suppliers shall conduct reasonable reviews on their supply chain partners and take necessary measures to ensure that their partners also comply with relevant standards and requirements. In addition, suppliers should regularly evaluate and update due diligence processes to adapt to evolving legal requirements and industry best practices, and to continuously improve supply chain management.

**6.4 Training**

Suppliers shall maintain appropriate management and employee training programs to enhance awareness and competency, implement policies and procedures, achieve improvement targets, and comply with applicable legal and regulatory requirements.

**6.5 Communication and Employee Feedback**

Suppliers shall clearly and accurately communicate their policies, practices, and expectations related to the content of this Code to their employees and provide relevant awareness campaigns and training. JA Solar encourages suppliers to translate their policies, statements into languages understandable to their employees and to post them publicly to ensure employee feedback and foster continuous improvement.

**6.6 Documentation and Recordkeeping**

Suppliers shall retain necessary documents and records, including electronic files, in full compliance with applicable legal requirements.

**6.7 Reporting Mechanism**

Suppliers shall establish and maintain an effective reporting mechanism to encourage their employees, supply chain partners, and other stakeholders to report any suspected violations of this Code, relevant laws, regulations, or policies. The mechanism shall include measures to protect the confidentiality and privacy of reporters and ensure that reporters can report concerns without fear of retaliation. Suppliers shall ensure the transparency of the whistleblowing mechanism and inform all stakeholders of how to use the system to make complaints or report issues.

## **7. Implementation of the Supplier Code of Conduct**

### **7.1 Notification Obligation, Audit Cooperation, and Corrective Measures**

If suppliers identify any actual or suspected violations of this Code, including but not limited to misconduct by their employees or supply chain partners, they shall promptly take appropriate remedial actions and notify JA Solar in a timely manner.

JA Solar reserves the right to audit suppliers' compliance with this Code. Audits may include, but are not limited to document reviews, on-site audits, and interviews with employees and stakeholders. Suppliers shall actively cooperate with JA Solar and its authorized third-party auditing agencies, provide necessary documents, data and other relevant information, and allow reasonable access to suppliers' offices, production facilities and related operational areas. For any violations identified during the audit, suppliers shall promptly develop and submit a corrective and remedial action plan, and take effective measures to restore compliance as soon as possible to prevent similar issues from happening again.

Suppliers should develop and implement internal control mechanisms for violations to ensure timely feedback on the improvement and refinement of their relevant policies, systems and procedures after issues occur.

### **7.2 Whistleblowing Mechanism**

JA Solar encourages suppliers, their employees, supply chain partners, and other stakeholders to report any suspected violations of this Code. All reports will be handled with strict confidentiality. JA Solar is committed to protecting the legitimate rights and interests of reporters, and strictly prohibits any form of retaliation.

You can report violations or raise concerns to us in the following ways:

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:



### **7.3 Consequences of Violations**

If a supplier violates this Code, JA Solar reserves the right to suspend or terminate its business relationship with the supplier. Suppliers shall ensure that their employees and partners are aware of and understand the consequences of the aforementioned violations and take effective measures to prevent any non-compliant behavior.

## References

➤ External references:

1. International Bill of Human Rights
2. [ILO Declaration on Fundamental Principles and Rights at Work](#)
3. [United Nations Guiding Principles on Business and Human Rights](#)
4. [United Nations Global Compact](#)
5. [United Nations Convention against Corruption](#)
6. [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas \(Third Edition\)](#)
7. [Chinese Mineral Supply Chain Due Diligence Guidelines \(Second Edition\)](#)
8. [Responsible Minerals Initiative \( RMI\)](#)
9. [ISO 9001:2015 Quality Management System](#)
10. [ISO 14001:2015 Environmental Management System](#)
11. [ISO 45001:2018 Occupational Health and Safety Management System](#)
12. [ISO 37301:2021 Compliance Management System](#)
13. [ISO 27001:2022 Information Security Management System](#)
14. [ISO 27701: 2019 Privacy Information Management System](#)
15. [Social Accountability International \( SAI\) SA8000 Standard](#)

➤ JA Solar's guidelines or policies:

1. [JA Solar Code of Conduct](#)
2. [JA Solar Human Rights Policy](#)
3. [JA Solar Responsible Sourcing Policy](#)
4. [JA Solar's Antitrust and Competition Law Global Compliance Policy](#)
5. [JA Solar HSSE Plan](#)
6. [JA Solar EHS Environment Health & Safety Policy Statement](#)
7. [JA Solar Biodiversity Policy](#)
8. [JA Solar Diversity Equity & Inclusion Policy](#)
9. [JA Solar Conflict Minerals Management Policy](#)
10. [JA Solar Environmental Social and Governance \(ESG\) Sustainability Policy](#)

11. [JA Solar Whistleblower Protection and Integrity Reporting Policy](#)
12. [JA Solar Anti-Fraud Reporting Policy and Investigation Procedures](#)
13. JA Solar Technology Integrity Agreement
14. [JA Solar SepakUp Policy and Procedure](#)

**Supplier Code of Conduct Compliance Commitment Letter**

To JA Solar:

We hereby acknowledge that we have read and understood the JA Solar Supplier Code of Conduct (“**Code**”), and commit to complying with the provisions and requirements set forth in this Code, as well as applicable laws and regulations. We endorse the values embodied in this Code and will conduct business activities in accordance with relevant legal and regulatory requirements.

Supplier Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_