

JA Solar Whistleblower Protection and Integrity Reporting Policy

1. Purpose

This policy is established to promote active and comprehensive engagement among employees, suppliers, and other stakeholders within JA Solar's group-level anti-fraud supervision system. It aims to encourage the reporting of fraud, corruption, and other illicit or unethical conduct. This policy is designed to ensure the confidentiality of reported information and protect whistleblowers while also enhancing employees' integrity awareness.

2. Scope of Application

This policy applies to JA Solar Technology Co., Ltd. (collectively and hereafter, 'JA Solar'), its subsidiaries and branches, and all associated employees.

3. Definition

3.1 Whistleblower: A whistleblower is any entity or individual who provides the Internal Audit Department (authorized to investigate fraud, illegal activities, and non-compliance) with information regarding violations committed by JA Solar employees. Whistleblowers may include, but are not limited to, employees, clients, suppliers, and partners of JA Solar.

3.2 Integrity Reporting: Integrity reporting refers to the obligation of an employee who, under unavoidable circumstances, is unable to refuse commercial bribery (including cash, transfers, checks, bank cards, etc.) during external exchanges or business activities, and must promptly report such to the Internal Audit Department and remit any received monetary gifts to the Finance Department. Employees are advised to thoroughly consider compliance issues before accepting any gifts and to adhere strictly to JA Solar's policies on gift acceptance, as outlined in the *Headquarters-Administration-004-Management Measures for the Receipt of Gifts in Business Conduct by JA Solar*. The Internal Audit Department is responsible for regularly checking the gift registration ledger and overseeing the submission, storage, and use of such gifts.

4. Protected and Rewarded Parties

The protected parties under this policy include whistleblowers who provide relevant information to the Internal Audit Department and employees who conduct integrity reporting. Individuals eligible for rewards include whistleblowers who report under their real names or entities that provide credible information to the Internal Audit Department of JA Solar.

5. Channels for Whistle-Blowing and Integrity Reporting

The Internal Audit Department offers the following channels for whistleblowers and reporter:

- (1) Email: antifraud@jasolar.com
- (2) Telephone: 010-63611911
- (3) QQ: 3476840246
- (4) WeChat Official Account: LianJieJA
- (5) DingTalk: anonymous integrity reporting & real-name integrity reporting
- (6) Mailing Address: Internal Audit Department, Beijing JA Solar Photovoltaic Technology Co., Ltd., No. 8 Building, Noble Center, No.1 Courtyard, East Auto Museum Road, Fengtai District, Beijing. Postcode: 100160
- (7) QR Code: Scan the QR code below to report directly.



- (8) JA Solar Website: Click “SpeakUp” at the top right corner of the website to report.

- (9) Overseas Reporting Channel:

<https://jasolar.speakup.report/wb>

All reports are managed by designated personnel in the Internal Audit Department.

6. Protection Provisions

6.1 Protection of Whistleblowers

In accordance to national laws, regulations, and company policies regarding the confidentiality of whistleblowers and the reported information, the Internal Audit Department, upon receiving information from a whistleblower, is required to handle, register, store, and investigate such information under strict confidentiality protocols to prevent any unauthorized disclosure or loss of the information. Any individuals found to violate such confidentiality requirements will face stringent and severe disciplinary action. The specific provisions are as follows:

6.1.1 The Internal Audit Department is the sole department authorized to investigate fraudulent activities and other illegal or non-compliant behaviors. It reports directly to the Board of Directors, the Audit Committee, and the Anti-Fraud Committee, ensuring that whistleblower handling and investigations are conducted with complete independence and objectivity in line with the governance structure.

6.1.2 The Internal Audit Department has established the *JA Solar Anti-Fraud Reporting Policy and Investigation Procedures* and the *JA Solar Whistleblower Protection and Integrity Reporting Policy*, which ensure that the reported information is managed exclusively by designated personnel, and that the personal information of the whistleblower, as well as the materials they provide, are securely kept in strict confidence.

6.1.3 Dedicated personnel within the Internal Audit Department are responsible for overseeing the whistleblowing channels, including the hotline, email, WeChat official account “LianJieJA”, and the DingTalk app. These personnel are also responsible for receiving and managing information and materials provided by whistleblowers. Access to such information is strictly limited, and unauthorized personnel are prohibited from viewing or inquiring about such information.

6.1.4 During the process of investigation, it is strictly prohibited to disclose the whistleblower’s report, as well as the whistleblower’s name, address, telephone number, or other personal information. The accused individual or the department under investigation must not be informed, in any means, of the content of the report. The investigation team is also prohibited from displaying original or copied materials in any form during investigation and verification processes.

6.1.5 Any announcements or public disclosures related to the case must exclude whistleblower's information, unless explicit consent is obtained from the whistleblower.

6.1.6 Unauthorized disclosure of the reported information or the personal information of the whistleblower, without JA Solar's explicit approval, will result in severe penalties and legal action against the responsible parties.

6.2 Protection of Employees Submitting Integrity Reports

Upon receiving an integrity report from an employee, the Internal Audit Department is responsible for protecting the employee from any form of retaliation. Suppliers, clients, JA Solar and its subsidiaries and branches, and all the associated employees, are prohibited from engaging in retaliatory actions against employees who submit integrity reports. If any supplier, client, internal parties of JA Solar and its subsidiaries and branches are found engaging in retaliation against the reporting employee, JA Solar will initiate legal action to protect the employee's legitimate rights and interests.

7. Whistleblower Reward Provisions

7.1 JA Solar encourages whistleblowers to report using their real names, as this approach facilitates the swift and efficient investigation of fraudulent activities and other illegal or non-compliant behaviors, and ensures the appropriate allocation of rewards. Real-name whistleblowing is defined as cases where the whistleblower provides their real name, accurate contact information, and is acknowledged as having made a valid report, either on their own behalf or as an authorized representative of an organization. As a general policy, rewards under this policy are reserved for individuals or entities that submit real-name reports.

7.2 For whistleblowers who are internal employees, JA Solar will take all necessary measures to ensure the confidentiality of the whistleblower's information when issuing rewards.

7.3 For individual whistleblowers who provide substantiated clues that are verified through investigation, JA Solar will grant a cash reward, and the amount of which will be determined based on the validity of the information provided, the nature of the reported case, and the severity of the violation.

7.4 For whistleblowers who are suppliers or partner entities, they are also eligible for cash rewards as outlined in Section 7.3. Alternatively, JA Solar may offer resource-based rewards, taking into consideration both the needs of the reporting entity and JA Solar's current situation.

7.5 In instances where whistleblowers provide direct and compelling evidence of offenses such as embezzlement, bribery of non-government employees, or similar violations, and if such cases are ultimately pursued as criminal cases by law enforcement, a cash reward will be granted. The reward amount will be proportional to the value of the case in question.

7.6 When two or more individuals jointly report the same case, they will be considered as a single whistleblower for the purposes of reward distribution. The reward will be apportioned among the whistleblowers according to a mutually agreed arrangement, which must be formalized through a written agreement on reward distribution signed by all parties involved.

7.7 JA Solar strictly prohibits any form of malicious reporting or false accusations. Any report made with the intent to distort facts or any complaint lodged in bad faith with retaliatory motives will result in the cancellation of any reward. Furthermore, JA Solar will hold the responsible parties accountable for such actions.

7.8 Rewards will be distributed through designated channels to ensure the confidentiality and protection of the whistleblower's identity.

8. Integrity Reporting Provisions

8.1 Employees who receive commercial bribes in the form of cash or cash equivalents are required to report to the Internal Audit Department immediately and provide comprehensive details of the bribe. Failure to voluntarily report the bribe within three working days will be deemed acceptance of the commercial bribe upon verification. JA Solar will address such matters in accordance with relevant company policies and applicable laws and regulations. If the conduct is deemed illegal, it will be referred to judicial authorities for further investigation and action.

8.2 Upon verification of bribery by the Internal Audit Department, the relevant business departments, such as the Procurement Department, will be promptly notified about the non-compliant supplier. JA Solar reserves the right to impose penalties on the supplier,

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including reducing procurement quotas or terminating the business relationship. In cases where the conduct is suspected to be illegal, it will be referred to judicial authorities for further action.

8.3 For other types of gifts and donations, employees are required to strictly follow the procedures outlined in the *Headquarters-Administration-004-Management Measures for the Receipt of Gifts in Business Conduct by JA Solar*.