

JA SOLAR



1. Introduction

2. Corporate and Supply Chain Overview

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Diagram 1:



3. Approach to Combat Modern Slavery

- A strict due diligence framework is applied across our operations and supply chain with respect to modern slavery as set out in this Statement.
- Several whistle-blowing channels are in place for both employees and external stakeholders to report concerns related to forced labour, human trafficking, child labour.

JA Solar Group regularly informs its stakeholders on the efforts to protect human rights via the Sustainability and ESG Report¹ website ².

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4. Governance, Policies and Procedures

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| ✧ JA Solar Code of Conduct | |
| ✧ JA Solar Supplier Code of Conduct | |
| ✧ JA Solar Conflict Minerals Management Policy | |

4.3

JA Solar Group adopted the United Nations Guiding Principles on Business and Human Rights (UNGPs) as the foundation for its human rights framework.

The human rights due diligence process as outlined in the JA Solar Human Rights Policy is designed to identify, prevent, mitigate, bring-to-an-end and remediate adverse human rights impacts, including forced labour, human trafficking and child labour.

Diagram 2: Human Rights Due Diligence Process

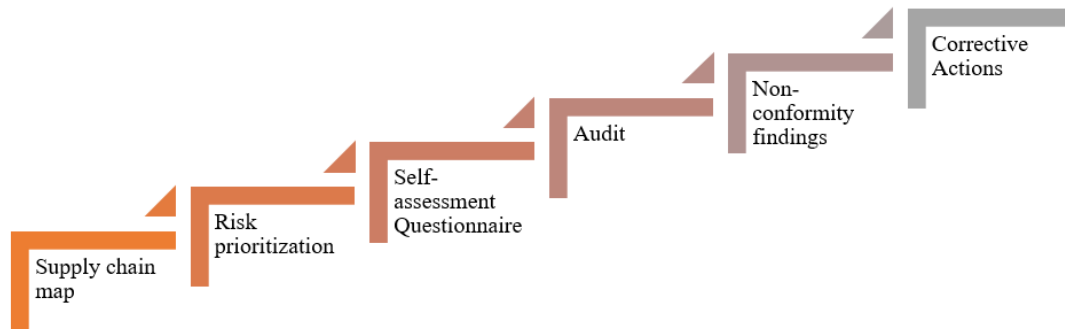


In particular, JA Solar Group follows the OECD Due Diligence Guidance for Responsible Business Conduct, to guide its supply chain due diligence and monitor supplier compliance with its Supplier Code, as reflected in the JA Solar Responsible Sourcing Policy.

The first step in JA Solar Group due diligence process is supply chain mapping, which enables it to gain visibility over its supply chain and identify risks. Following this, JA Solar Group adopts a risk-based approach to due diligence. Risk prioritization is carried out based on factors such as sector risks, product risks, geographic risks, and enterprise-level risks.

Through this process, JA Solar Group identifies prioritized suppliers and conducts enhanced due diligence using standardized assessment tools, such as supplier questionnaires and on-site audits, either directly or through third parties.

Diagram 3: Supply Chain Due Diligence Process



Generally, JA Solar Group places strong emphasis on collaborative engagement with suppliers. Suppliers are required to develop and implement appropriate corrective action plans on identified non-conformities. JA Solar Group works with suppliers to evaluate the effectiveness of their actions to address forced labour, human trafficking and child labour risks. However, if a supplier refuses to cooperate, or if the adverse impacts of the non-conformities cannot be effectively mitigated or remedied, JA Solar Group does not hesitate to take decisive actions, including the potential termination of the business relationship.

5. Risk Identification and Risk Management

5.1

In 2024, JA Solar Group conducted the human rights due diligence. Forced labour, human trafficking, child labour and other related risks were identified as the prioritized

issues for assessment. JA Solar Group evaluated potential risks based on two dimensions: severity and likelihood. For severity, factors considered include scale, scope, and remediability. These two dimensions formed the basis of the Human Rights

Matrix

risks into different risk levels. For each identified prioritized issue, JA Solar Group reviewed the existing internal controls, management systems or processes to assess the residual risk – that is, the level of risk remaining after current mitigation measures are taken into account.

anding law firm conducted due diligence processes separately through questionnaires, documents review and confidential employee interviews. The interviews included questions related labour, as well as aspects of the recruitment process such as age verification. These interviews were designed to assess both the presence of forced and child labour risks, human trafficking risks and the effectiveness of current risk mitigation measures.

Based on this due diligence, JA Solar Group did not identify any use of forced labour, human trafficking or child labour within its operations.

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6. Training and Competence Building

7. Effectiveness of Risk Controls

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