

# **JA Solar Human Rights Policy**

## 1. Commitment

JA Solar has an ambition to leave a positive legacy for the planet and people by developing solar power that can benefit the entire human race. Respect for human rights is a fundamental value of JA Solar and we put great efforts into the management of human rights in our operations and in our value chain. This Human Rights Policy (the “**Human Rights Policy**”) of JA Solar Technology Co., Ltd., its subsidiaries and production bases (together “**JA Solar**”) expresses our commitment to prevent, cease or minimize any actual or potential adverse human rights impact. JA Solar is committed to respecting the rights under:

- The International Bill of Human Rights,
- ILO Declaration on Fundamental Principles and Rights at Work,
- United Nations Guiding Principles on Business and Human Rights, and
- United Nations Global Compact.

This Human Rights Policy outlines minimum requirements within JA Solar and also expresses how JA Solar identifies and deal with any potential or actual adverse human rights impacts within our organization and in our supply chain.

## 2. Scope and Expectations

This Human Rights Policy applies worldwide to JA Solar and all permanent and temporary employees, contractors, directors and other third parties employed or engaged by, or providing services on behalf of, JA Solar. All these individuals and entities must know and follow this Human Rights Policy and the principles contained herein.

JA Solar also requires our business partners and suppliers to apply equivalent principles to those of this Human Rights Policy in their operations and in their supply chain.

### 2.1. Expectations from employees

JA Solar holds all our employees accountable for upholding the values in this Human Rights Policy and requires them to recognize and observe these values in their interaction with follow employees, business partners and suppliers. Breaches of this Human Rights Policy are serious matter and may render employees liable to disciplinary action, including dismissal. Breaches of this Human Rights Policy may in many jurisdictions also amount to criminal conduct.

### 2.2. Interaction with business partners

Compliance with human rights can only be effective if they are upheld in the entire value chain. Therefore, JA Solar requires all business partners and suppliers to implement and to ensure compliance with our human rights standards based on our contracts and JA Solar’s Supplier Code of Conduct. JA Solar also requires them to require compliance with human rights related standards at their own suppliers and business partners accordingly. JA Solar will take actions and

may end its relationship with third parties who have been found to be in breach of standards pertaining to human rights and ethical conduct.

JA Solar requires our business partners and suppliers without undue delay to inform JA Solar of any actual or potential adverse human rights impacts pertaining to JA Solar's business operations or JA Solar's supply chain.

### **2.3. The role of the Compliance Management Committee**

This Human Rights Policy has been approved by JA Solar's Compliance Management Committee and is subject to review at least once a year. JA Solar's Compliance Management Committee will conduct regular performance reviews in relation to this Human Rights Policy. The Compliance Management Committee will also regularly consider if this Human Rights Policy remains consistent with the applicable standards and practices and will make any changes it considers desirable.

## **3. Human Rights Principles**

JA Solar follows and requires adherence to the following key principles.

### **3.1. No modern slavery**

JA Solar does not tolerate any form of modern slavery, including forced labor, prison labor, indentured labor and human trafficking. JA Solar ensures that our operations and value chains are free from these and any similar practices. JA Solar's business partners and suppliers cannot use modern slavery in any form. JA Solar proactively engages and work with our business partners and suppliers to ensure that our supply chain is free from modern slavery.

### **3.2. No child labor and safe working environment for underage workers**

JA Solar is strictly opposed to any form of child labor. JA Solar does not tolerate employment of children in any manner that is economically exploitative or is likely to interfere with the child's education. JA Solar prohibits the use of child labor in our businesses and value chains. All employees shall be above the legal age of employment in the countries in which they are employed. Interns and those gaining work experience who are under the legal age of employment can only be engaged where it is legal and safe to do so.

### **3.3. Non-discrimination and equal opportunity**

JA Solar strongly believes all people must be treated equally regardless of gender, race, nationality, political opinion, affiliation to a union, ethnic, social or indigenous origin, religion or belief, marital or family status, disability, age, sexual orientation, gender identity or any other factor protected by law. Employment and remuneration decisions shall not be made on the basis of personal characteristics or other characteristics that are unrelated to inherent job

requirements. JA Solar encourages diversity and believes men and women shall receive equal remuneration for the same work and work that is of equal value.

### **3.4. Fair working conditions**

All workers must be treated honestly, fairly and with dignity and JA Solar does not tolerate any harassment or bullying in the workplace. JA Solar does not allow the use of corporal punishment, threats of violence or other forms of mental or physical coercion. JA Solar also do not allow public warning or punishment systems.

JA Solar believes every worker has a right to remuneration that is sufficient to meet the worker's basic needs. Wages, overtime, right to rest and leisure, access to toilets, rest facilities and portable water at their place of work as well as other working conditions must be reasonable and adhere to national legislation and collective agreements.

### **3.5. Safe and healthy working conditions**

JA Solar has a duty to make sure all business activities are carried out in the safest way to prevent injury and illness. All workers have a right to work in a safe and healthy work environment, where risks to their health and their safety are controlled with suitable preventative and protective measures.

### **3.6. Respect of freedom of association and collective bargaining**

JA Solar upholds the freedom of association and respect for the right of all workers to freely and voluntarily establish and join groups for the promotion and defense of their occupational interests in accordance with national law.

### **3.7. Respect of the rights of local and indigenous communities**

JA Solar respects local, indigenous and tribal people's rights, including their rights to maintain and strengthen their own institutions, cultures, traditions and to pursue their development in keeping with their own needs and aspirations as well as to participate in decision-making processes that affect their lives.

### **3.8. The need to mitigate climate change**

JA Solar believes that climate change is one of the greatest threats to human rights of our generation, posing a serious risk to the fundamental rights to life, health, food and an adequate standard of living of people around the world. Reduction of freshwater resources, change to ecosystems and terrestrial food production is already evident in some parts of the world and will affect basic human rights. Everyone has a duty to act now and to cooperate to mitigate climate change.

## 4. Our Approach to Human Rights

JA Solar takes the following actions to implement our human rights commitments and to ensure that our operations and value chains are not involved in any adverse human rights impacts.

### 4.1. Human rights impact assessment

JA Solar continuously monitors and evaluates the evolving human rights situation in relevant areas. Human rights impacts must be integrated into all relevant risk assessment procedures. JA Solar will regularly and at least once every twelve months identify and assess the potential risks of adverse human rights impacts. The human rights impact assessment has to be revised when changes occur in relation to JA Solar's business operations.

### 4.2. Actions to control the risk of adverse human rights impacts

Based on the human rights impact assessment, JA Solar develops responses and controls to mitigate the risks of adverse human rights impacts and to resolve any potential adverse human rights impacts before they can materialize.

JA Solar must maintain contractual assurances from relevant direct business partners and suppliers with whom JA Solar has an established business relationship regarding compliance with the above human rights principles and assurances from each business partner that it will obtain corresponding assurances from its partners that are part of JA Solar's supply chain.

JA Solar must put in place detailed human rights due diligence procedures as well as responses and controls in relevant policies and management systems which shall be periodically updated to reflect changes in JA Solar's business operations and the human rights risk assessment. These policies must at a minimum contain a description of JA Solar's approach to due diligence, the processes put in place, controls, mitigation actions and measures that shall be taken to verify compliance with JA Solar's human rights commitments and this Human Rights Policy.

JA Solar carries out relevant actions and always maintains a comprehensive complaints mechanism which allow stakeholders to report any concern or query anonymously without fear of prejudice or reprisals.

### 4.3. Prevent, cease and minimize adverse human rights impacts

JA Solar will take actions to prevent, adequately mitigate, cease or minimize actual or potential adverse human rights impacts that JA Solar identifies.

If JA Solar identifies actual human rights impacts in its own operations, it shall take appropriate measures to immediately bring those adverse impacts to an end.

JA Solar believes in continuous engagement with value chain business partners and suppliers and that disengagement is a last-resort action, especially in situations where that may exacerbate the

adverse impact. JA Solar will take this into consideration when deciding the appropriate action to take in relation to identified adverse human rights impacts in its value chains. However, JA Solar cannot extend or enter into new relationships with a party if adverse human rights impacts have been identified. JA Solar shall if possible temporarily suspend the commercial relationship while pursuing prevention and minimization efforts. If the adverse impact is severe and it is not likely that the disengagement will exacerbate the adverse impacts, the relationship can be terminated immediately.

#### **4.4. Monitoring of the implementation and the effectiveness**

JA Solar carries out periodic assessments to monitor the implementation and effectiveness of its measures and the identification, prevention, minimization, bringing to an end and mitigation of human rights impacts. Such assessments shall verify that adverse impacts are properly identified, review measures are implemented and adverse impacts have actually been prevented or brought to an end. Such assessment shall be carried out at least every twelve months and be revised in between if there are reasonable grounds to believe that significant new risks of adverse impact could have arisen.

JA Solar's Compliance Management Committee shall conduct regular performance reviews against the principles of this Human Rights Policy as well as relevant internal policies and procedures to ensure that JA Solar fulfills all commitments in this Human Rights Policy.

#### **4.5. Training and engagement with third parties**

JA Solar provides necessary training to employees, managers and third parties in relation to human rights and the commitments in this Human Rights Policy. JA Solar proactively engages and works with our business partners and suppliers to ensure that they understand JA Solar's human rights commitments and the work that JA Solar requires them to carry out.

#### **4.6. Communication of actions taken**

JA Solar will disclose the work conducted in relation to human rights in its Modern Slavery Statements, Sustainable Development Report, ESG Report and other relevant public documents.

## **5. Grievance Reporting and Comments**

### **5.1. Grievance reporting**

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

Our SpeakUp channels can be found at our website at [www.jasolar.com](http://www.jasolar.com)

The postal address for complaints is as follows:

JA Solar Audit Committee  
No. 8 Building, Nuode Center  
No.1 Courtyard, East Auto Museum Road  
Fengtai District, Beijing  
CHINA

You can also call at the following number: +8610-63611911 (China)

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. Anonymous reporting is possible and JA Solar will treat such reports with the same level of care and diligence as we handle other reports. JA Solar does not tolerate any form of retaliation, retribution, victimisation or detriment as a result of using any of our reporting lines.

## **5.2. Questions or comments**

If any stakeholders have any questions or comments regarding the content and application of this Human Rights 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.