

JA Solar Responsible Sourcing Policy

1. JA Solar's commitment

Cooperation with suppliers based on responsible sourcing is key to achieve a strong and reliable supply chain. It helps reducing risks 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 our work with each supplier 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 Policy sets out the requirements for the sustainable procurement of goods and services. We strongly believe that this is a common journey of JA Solar and its suppliers, and we are bound to contribute to a better future for all.

2. Introduction

The objective of the Responsible Sourcing Policy (the "**Policy**") is to ensure ethical, legal, and sustainable procurement of products and services. By following this Policy, we aim to ensure compliance with existing and upcoming domestic and international legislation relating to supply chain due diligence and compliance. JA Solar is committed to apply to the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct to its procurement practices. As a corporate citizen, we seek to act with integrity and honesty by addressing all stakeholders and all environmental, social and governance (collectively "**ESG**") concerns.

This Policy applies to JA Solar Technology Co., Ltd., and all of its subsidiaries and production bases (collectively "**JA Solar**"), as well as all departments, directors, officers, employees, agents, and contractors.

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 process, the issuance of any new relevant legislation or guidance, and with due consideration of relevant information from stakeholders.

3. Our requirements for suppliers

At JA Solar, we strive to conduct our business with honesty and integrity in a legal, compliant, and sustainable manner.

3.1. Principles

Firstly, we require our suppliers to carry out their activities with respect and dignity for all human beings. This includes, but is not limited to, strictly always adhering to the following 12 principles:

- Principle 1: JA Solar has a zero-tolerance policy against forced and any other form of involuntary labor, human trafficking, and slavery. Our suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working, and our suppliers may only hold onto such documents for a short time to the extent reasonably necessary to complete legitimate administrative and immigration processing. Workers must be given clear, understandable contracts regarding the terms and conditions of their engagement in a language understood by the worker.
- Principle 2: JA Solar condemns and does not tolerate the use of child labor. This means that anyone under 15 years of age shall not work unless national or local law stipulates a higher mandatory school leaving or maximum working age in which case the higher age shall apply. Furthermore, workers under the age of 18 must not perform work during night, hazardous work or any work that is likely to interfere with their education, or to be harmful to their health or physical, mental, spiritual, moral, or social development.
- Principle 3: Our suppliers must not supply products that contain conflict minerals which directly or indirectly finance or benefit armed groups and cause human rights abuse as stated in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Principle 4: Our suppliers must provide workers with a safe and healthy work environment for their employees and comply with applicable labor standards and working time regulations. Our suppliers must educate

workers on safety procedures and control workers' exposure to potential physical safety hazards by implementing physical guards, barriers, and/or engineering, and administrative controls.

- Principle 5: Our suppliers must not discriminate based on race, color, national origin, gender, sexual orientation, religion, disability, age, political opinion, pregnancy, marital or family status, or similar factors in hiring and working practices such as job applications, promotions, job assignments, training, wages, benefits, and termination.
- Principle 6: All workers must be treated with fairness and dignity. Our suppliers must not engage in or permit physical, verbal, or psychological abuse or coercion, including threats of violence, sexual harassment, or unreasonable restrictions on entering or exiting work and residential facilities.
- Principle 7: Our suppliers must respect the rights of workers to form or join trade unions (or other legal organizations of their own selection) and the right to collective bargaining. Workers must not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such trade unions or other legal organizations.
- Principle 8: Our supplier must not engage in bribery or any other form of corruption.
- Principle 9: Our suppliers must comply with local laws, such as environmental laws, at all times. Suppliers must identify hazardous substances, including mercury, mercury compounds, ozone depleting substances and persistent organic pollutants, in their products and operations, and ensure that those substances are eliminated or those substances are produced, handled, used, stored, traded or disposed in environmentally sound manner and in full compliance with international environmental conventions.
- Principle 10: Our suppliers must adopt a management system to ensure compliance with applicable laws, the principles in this Policy and to facilitate continual improvement. To this end, suppliers must create an

effective mechanism for workers to submit their grievances. Supplier must not tolerate any form of retaliation, retribution, victimisation, or detriment as a result of using such a reporting line.

- Principle 11: Our suppliers must seek to trace materials and products by way of supply chain mapping from the source to the final product and by following any of JA Solar’s reasonable traceability instructions.
- Principle 12: Our suppliers must work and engage closely with their own suppliers towards implementing the principles and action points stipulated in this Policy. To this end, suppliers need to integrate due diligence and requirements into their policies and risk management systems and should review their complete supply chain for actual or potential adverse impacts on those principles and action points. Suppliers should also take appropriate measures to prevent, mitigate, and end such adverse impacts. Whenever relevant concerns are identified, our suppliers shall inform JA Solar, and to work together with JA Solar to address such concerns with a view to remedy the potential or actual risk or concern.

3.2. Action points

We also expect our suppliers to take the following seven action points as stated below. The extent to which such measures have been taken will be a major consideration when choosing a new supplier or when procuring materials and services from existing suppliers:

- Action point 1: Our suppliers must develop management systems to reduce the impact of their activities on the environment, including avoiding any measurable environmental degradation, throughout the product life cycle, on an on-going basis.
- Action point 2: Our suppliers must identify waste streams in their operations and shall adopt a circular economy attitude with the constant objective to reduce, re-use, repair, recycle, recover or to dispose of all waste in an environmentally responsible manner. Our suppliers shall identify and seek to use and increase the percentage of recycled materials in the production process.

- Action Point 3: Our suppliers must reconsider the use of plastics in their products and packaging and seek to reduce its use on an on-going basis.
- Action point 4: Our suppliers must consider, develop, and implement options to reduce water consumption.
- Action point 5: Our suppliers must avoid or minimise adverse impacts on protected areas, including world heritage sites, and areas of high conservation, including wetlands, and avoid or minimise possible adverse impacts on biodiversity.
- Action point 6: Our suppliers must assess their carbon footprint and take appropriate steps to reduce their carbon footprint.
- Action point 7: Our supplier must share relevant information, including sustainability KPI and supply chain information, as reasonably requested by JA Solar.

4. Organizational framework

4.1. Building strong relationships and supply chains

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, improved processes, and templates.

JA Solar has established a comprehensive framework to identify and address key risks associated or stemming from our suppliers from pre-screening, selection, onboarding, due diligence and ESG monitoring to disengagement in case 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.

In brief, JA Solar's framework for the ESG managements of suppliers consist of the following elements:

1. A screening process for selecting new suppliers, taking into account ESG requirements.
2. Contractual assurances from our suppliers to comply with our ESG standards and JA Solar's Supplier Code of Conduct.
3. Monitoring of existing suppliers to verify compliance and progress made, consisting of regular and *ad hoc* reviews and audits.
4. Enforcement in case of non-compliance, consisting of different measures to be taken, as appropriate, depending on the level and severity of the compliance issue.

These are elaborated in more detail below.

4.2. Selection of new suppliers

At the outset, JA Solar screens its direct suppliers carefully taking into account human rights, environmental, social and climate risks when considering whether to start a relationship with a new supplier. As part of this process, JA Solar relies on publicly available databases (online publications, studies, independent reports, etc.) to identify whether, based on information that can be found therein, there may be risks in starting a business relationship with specific suppliers. Potential suppliers are required to respond to questions and provide confirmation on a set of ESG topics. Based on the information provided, JA Solar conducts its own due diligence and assessment of each potential supplier based on publicly available information, including, where relevant, any guidelines that may be issued by relevant authorities on risk indicators and areas in the context of relevant ESG and due diligence legislation.

As part of the onboarding process, our requirements and expectations are clearly communicated to the suppliers, who commit to comply with relevant ESG standards as part of their contract with us. Based on due diligence, we may request additional contractual clauses on certain categories or groups of suppliers. In addition, we may train certain categories of suppliers on relevant topics of ESG or propose other measures due to a risk-based approach.

4.3. Existing suppliers

With respect to existing suppliers, we use a variety of sources to identify risks and to exercise due diligence within our supply chain, such as ESG questionnaires,

public sources, media reports, social media, international organizations, NGOs, expert opinions, and technical literature. In addition, existing suppliers will be subjected to regular reviews and audited at regular intervals. In case any concerns have been submitted to JA Solar through its grievance procedure or JA Solar has otherwise become aware of such concerns in relation to specific suppliers, *ad hoc* audits may be conducted pursuant to such concerns.

4.4. Monitoring

JA Solar conducts regular reviews and audits of its suppliers, to confirm their compliance with our ESG requirements, as well as to collect and assess relevant information concerning possible adverse impacts in accordance with requirements of relevant ESG and due diligence legislation. This review may consist of, for instance, third-party auditing of work and residential facilities and conducting confidential worker interviews. Suppliers must be transparent and provide prompt access to their facilities, relevant records, and access to workers during any audit.

In case any issues or instances of non-compliance are identified through an audit, and the supplier is requested to take corrective actions, JA Solar will track the suppliers' progress in doing so, and will follow-up with a review focused on assessing whether the corrective actions have been effective.

Suppliers need to retain documentation demonstrating their compliance with our ESG requirements for at least five years.

4.5. Enforcement in case of non-compliance

If we become aware of a (possible) infringement of contractual commitments related to ESG and/or compliance risks, we will open an investigation to understand the scope, the exact causes, and the factors that have contributed to it as well as the overall context:

- In case minor compliance concerns are identified that can be promptly and effectively addressed through corrective actions and remediation plans, JA

Solar will work with the supplier to ensure that these can be implemented and are effective. To this end, a suitable action plan will be developed, to be implemented within a reasonable and clearly defined timeline. During the period agreed for implementation, JA Solar reserves the right to temporarily suspend the business relationship with respect to the activities concerned. If we come to believe that the supplier cannot or is not willing to rectify the situation within the agreed timeframe, we will review the relationship with the supplier and possibly end the business relationship. As has been explained above, JA Solar reserves the right to temporarily suspend or permanently end the business relationship with any supplier that is found to be in violation with any of the requirements of JA Solar's ESG standards and/or the supplier's contractual commitments.

- In cases of major compliance concerns, JA Solar may end the business relationship, without first seeking to resolve the issue with the supplier, for instance where:
 - the supplier refuses to cooperate (denying prompt access to auditors, refusing to provide relevant information about its operations, etc.);
 - the supplier is found to have intentionally provided JA Solar with false, misleading, or forged documents or information; and/or
 - the supplier is found to have committed serious violations of relevant ESG requirements, such as a violation of the prohibition on using child or forced labour, or serious environmental violations.

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

4.6. Small and medium sized enterprises

The allocation of responsibilities and the definition of processes, 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 understands the need to support small and medium sized enterprises to fulfil our ESG standards.

5. Reporting, awareness and training

We believe that increased transparency will result in improved supply chain sustainability for customers and employees.

JA Solar reports regularly in public on the progress and work undertaken within the scope of this Policy. In addition, 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;
- the major requirements under relevant ESG and due diligence legislation;
- the contents of the contractual clauses agreed with suppliers; and
- the contents of the organizational ESG framework established by this Policy to manage suppliers.

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

6. Grievance procedure

To ensure strong compliance with its obligations outlined above, and specifically to be able to rely on an as wide as possible pool of information about its suppliers, JA Solar has put in place a developed grievance procedure. Through this complaints procedure, 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' channels can be found at our website at www.jasolar.com. All issues or questions 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, victimisation or detriment as a result of using any of our reporting lines.

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).

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 or other contact information available on our website.