
Business Ethics Policy of Jinko Solar

一、 Introduction

Jinko Solar Co., Ltd. (referred to as "Jinko Solar" or "the Company") has always regarded business ethics as a core cornerstone of the Company's sustainable development. The Company strictly adheres to business ethics-related laws, regulations, codes of conduct, and international conventions in all jurisdictions where it operates. On this basis, the Company has established a comprehensive business ethics governance structure and management system covering the entire process of decision-making, implementation, supervision and improvement. The Business Ethics Policy of Jinko Solar (referred to as "the Policy") aims to systematically regulate the business ethics conduct of all employees, suppliers, and other stakeholders of the Company. The Policy aims to ensure that all business activities comply with business ethics-related laws, regulations, and standards, and strictly prohibits any behaviors that violate the principles of integrity.¹

二、 Scope of Application

The Policy applies to all business and operational activities of the Company and its subsidiaries. It also encourages all directors, senior management, and employees (including full-time employees, part-time employees, contractors, etc.) of the Company, as well as value chain partners (including service providers, suppliers, business partners, etc.) to adhere to the Policy and jointly promote business ethics management. The Policy is applicable simultaneously to all business activities of the Company such as mergers and acquisitions and due diligence activities carried out globally. The Company also commits to exerting influence on non-controlling joint ventures and urges them to act in accordance with the relevant provisions of the Policy.

¹ Unless otherwise specified, the term "suppliers" mentioned in the Policy refer to the direct suppliers of Jinko Solar.

三、 Release Statement

The Company's business ethics management efforts are overseen by the Board of Directors as the highest decision-making and supervisory body. The release of relevant policies and commitments has been approved by the Company's Board of Directors and senior management. Generally, the review and revision cycle of the Policy is yearly. The Policy will also be subject to audits in alignment with the Company's internal and external audit schedules, to ensure the timeliness and applicability of the Policy. The Policy is prepared in both Chinese and English versions. Any inconsistency between the Chinese and English versions, the Chinese version shall prevail.

四、 Business Ethics Management

1. Anti-Bribery and Anti-Corruption

Jinko Solar has formulated and continuously improved internal management systems related to business ethics, including the *Supervision Management System*, the *Integrity Reporting and Rewards/Punishments Management System*, the *Gift Management Regulations*, the *Employee Discipline and Violation Management Regulations*, etc. These systems clearly delineate the management requirements governing anti-corruption, anti-bribery, anti-fraud, and other business ethics conduct. The Company commits to completing the ISO 37301 Compliance Management System Certification at the group level in 2025; by the end of 2030, it will ensure that 30% of its production-oriented subsidiaries have completed the ISO 37301 Compliance Management System Certification. The ISO 37301 Compliance Management System Certification covers issues related to business ethics.

The Company has established an integrity risk prevention and control mechanism covering all business processes and has adopted comprehensive measures to actively prevent all forms of bribery and corruption conduct. The Company maintains a "zero-tolerance" stance towards all duty-related crimes or violations, including corruption, bribery, job-related encroachment, misappropriation of public funds, etc. Under no circumstances shall any personnel of the Company, directly or indirectly, offer, promise

to offer, accept, or solicit any valuable items or benefits to induce others to commit illegal acts or violate fiduciary obligations in business operations, thereby seeking improper benefits for the Company or individuals. All employees of the Company are required to sign the *Employee Integrity and Self-Discipline Commitment* and the *Acknowledgment and Commitment Letter Regarding Employee Discipline and Violation Management Regulations*, confirming that they are aware of and will abide by the Company's policies related to business ethics. Additionally, all managers of the Company are required to sign the *Integrity and Self-Discipline Commitment* and take the lead in setting an example.

The Company has issued the *Gift Management Regulations* to standardize and enhance the management of gift receipt and giving by departments or employees in daily work and external interactions. According to the regulations, any cash, gifts, or other equivalents received for whatever reason must be promptly registered with the Supervision Department and returned to the original entity or individual without delay. In daily work and external interactions, only gifts of commemorative significance may be given in principle; the provision of cash, gift cards, negotiable securities, or other such gifts or monetary benefits is strictly prohibited. Additionally, departments or employees may provide or accept gifts and entertainment only if they do not act as inducements for specific business decisions, and must provide a detailed explanation of the background and expense breakdown to ensure compliance.

2. Donations and Sponsorships

Jinko Solar maintains a clear understanding of political issues and changes that may affect the Company's business. However, the Company has always adhered to a politically neutral stance and does not actively engage in any form of direct or indirect political donations.

The Company commits to participating in charitable initiatives that serve communities where people live and work. The purposes of such charitable initiatives must be appropriate. It is strictly prohibited to obtain transaction opportunities, service

convenience, preferential terms, competitive advantages, or other economic and non-economic benefits through the provision of property or assets under the pretext of charitable donations or similar activities. All charitable initiatives must be approved in advance, and donation records must be properly preserved.

The Company provides sponsorships for activities that are aligned with its business strategies and values. Any sponsorship must comply with applicable laws and regulations, and must not be aimed at securing new business or retaining existing business. All sponsorships must be approved in advance, and records of their implementation must be properly preserved.

3. Anti-Unfair Competition and Anti-Monopoly

Jinko Solar strictly adheres to relevant laws and regulations such as the *Anti-Unfair Competition Law of the People's Republic of China*, the *Anti-Monopoly Law of the People's Republic of China* and the *Advertising Law of the People's Republic of China*, and actively promotes the development of an anti-unfair competition and anti-monopoly management system. The Company has formulated the *Compliance Management System for Anti-Monopoly and Anti-Unfair Competition*, which provides clear and explicit codes of conduct and regulatory guidelines for all employees across multiple dimensions, including advertising and publicity compliance, bidding compliance, trade secret protection, prevention of predatory pricing, anti-monopoly agreements compliance, prevention of abuse of market dominance, and compliance training and publicity. This ensures the continuous enhancement of the Company's compliance management capabilities in the realms of anti-monopoly and anti-unfair competition.

The Company commits that, throughout all aspects of its production and business operations, it shall unswervingly adhere to the fundamental principles of voluntariness, equality, fairness and good faith. It shall strictly abide by legal boundaries and business ethics standards, and resolutely refrain from any practices that violate anti-monopoly and anti-unfair competition laws and regulations. The Company further commits that it shall not engage in any fraudulent transactions, commercial defamation or trade secret

infringement activities, shall not participate in any unfair competitive practices such as collusion, conspiracy or mutual collaboration, and shall not abuse its advantageous position to harm partners' interests or impose unreasonable demands, thereby creating a sound environment and conditions for fair competition. Furthermore, the Company actively advocates that all employees and value chain partners embrace sound values and healthy competitive awareness, encourages business activities conducted through legal, compliant and reasonable means, and works collectively to foster a market environment characterized by fairness, impartiality, openness and transparency.

4. Prevention of Conflicts of Interest

Jinko Solar conducts comprehensive management of conflicts of interest risks to ensure that such risks are effectively identified, prevented, and mitigated, thereby safeguarding the organization's interests, market fairness, and the rights and interests of stakeholders. The Company requires all employees to avoid direct or indirect conflicts of interest between their personal interests (including those of immediate family members) and the Company's interests. Employees must notify the Company to obtain case-specific handling opinions when encountering actual or potential conflicts of interest.

5. Anti-Money Laundering and Anti-Insider Trading

Jinko Solar strictly adheres to anti-money laundering and counter-terrorism laws and regulations across all jurisdictions where it operates. The Company commits to conducting business exclusively with commercial partners that have legitimate sources of funds and an established reputation for integrity. The Company promptly reports any large-value transactions and suspicious activities that may emerge in the course of business operations. The Company exercises rigorous oversight over cross-border transactional funds to ensure full compliance with the regulatory requirements of governmental authorities. Additionally, the Company maintains close collaboration with law enforcement agencies and regulatory bodies to jointly prevent and combat money laundering activities.

The Company maintains a "zero-tolerance" stance towards insider trading and has established a stringent management system for the registration of insiders with access to inside information. This system clearly defines the scope of inside information and insiders with access to it, and refines the record-keeping management measures, confidentiality obligations and accountability mechanisms for those insiders. Prior to the legal and public disclosure of insider information, any insider is strictly prohibited from disclosing or leaking such information, nor may they use it for insider trading. Employees of the Company who have access to insider information during work must strictly adhere to confidentiality regulations and are prohibited from disclosing it to irrelevant parties. For external organizations or individuals requiring access to insider information for work purposes, the Company will sign an insider information confidentiality commitment letter with them, specify confidentiality responsibilities and obligations, and implement full-process supervision and standardized management over their access to such information.

6. Prohibition of Collusion

Jinko Solar commits that in the course of business operations, it strictly prohibits acts such as direct collusion, beneficial collusion, and tacit collusion. The Company shall not, with knowledge of the occurrence of illegal acts such as crimes, conduct any act or omission that has a material impact thereon, nor intentionally abet any illegal act, nor provide any assistance to other organizations or individuals for their wrongful acts that violate or disregard international codes of conduct. The Company shall also actively report such wrongful acts. The Company actively disseminates the concepts and policies of prohibiting collusion to internal and external stakeholders.

7. Supplier Business Ethics Management

The Company strictly adheres to business ethics requirements in supplier management. During the admission process, comprehensive due diligence is conducted across multiple dimensions including business ethics, corporate credit, information security, etc., to ensure suppliers have no history of major disciplinary violations or regulatory non-

compliance. At the start of cooperation, all suppliers are required to sign the *Jinko Solar Supply Chain Partner Code of Conduct* (referred to as "COC"). The Company regularly updates the integrity clauses in cooperation contracts to specify the integrity responsibilities and obligations of both parties. In routine reviews, if any major business ethics risks are identified in suppliers, the Company immediately requires them to submit improvement plans and continues to track and supervise until compliance is achieved. Additionally, key suppliers are mandated to formulate anti-bribery and anti-corruption policies, conduct regular internal business ethics audits, and actively cooperate with external business ethics audits.

8. Business Ethics Training

Jinko Solar has established a comprehensive business ethics training mechanism, integrating internal and external online/offline resources to deliver annual business ethics training to directors, supervisors, senior management, all employees (including full-time employees, part-time employees, contractors, etc.), staff in key positions, and key suppliers. The content of business ethics training covers, but is not limited to, key business ethics issues such as anti-bribery and anti-corruption, anti-unfair competition and anti-monopoly, prevention of conflicts of interest, anti-money laundering and anti-insider trading, etc. It also incorporates detailed explanations of reporting channels, ensuring that all trainees are well-acquainted with the Company's reporting channels and procedures. Through this series of training programs, the Company aims to enhance the ability of all its personnel and external suppliers to identify and prevent improper conduct, thereby mitigating business ethics risks at the source. The Company commits to ensuring that 100% of its employees receive business ethics-related training every year, starting from 2025.

9. Business Ethics Audit

Jinko Solar has established the Audit Committee under the Board of Directors, which supervises the development and implementation of internal audit system on behalf of the

Board of Directors. The Audit Committee regularly reports the progress of internal audits to the Board of Directors. Meanwhile, the Company has set up the Audit Department, which is responsible for promoting audit plans, conducting inspections and supervisions, as well as monitoring and auditing internal and external risks.

The Company's audit scope covers key management processes in business activities, with audit forms including comprehensive management audits and special audits, etc. The Company's audit activities are carried out across all production bases, arranged on a rolling basis according to the annual audit plans, and cover all production bases in a cycle of 2-3 years. For those that cannot be covered within the year, internal control self-assessments will be conducted. Through the combination of audits and internal control self-assessments, the Company can achieve annual evaluation coverage of all production bases. Both the Company's audit and internal control self-assessment activities involve special project on business ethics, with evaluation contents including but not limited to business ethics risk points such as anti-bribery and anti-corruption, anti-unfair competition and anti-monopoly, prevention of conflicts of interest, anti-money laundering and anti-insider trading, as well as the implementation of business ethics standards and anti-bribery and anti-corruption policies.

Additionally, the Company conducts group-level internal and external special audits on compliance issues such as corporate governance, intellectual property, anti-bribery and anti-corruption, anti-unfair competition and anti-monopoly, etc. Generally, at least one internal special audit and one external special audit are carried out each year. The audit contents cover the identification and implementation of business ethics risks and obligations, as well as the implementation of business ethics standards and anti-bribery and anti-corruption policies.

10. Complaints and Reporting

Jinko Solar has formulated the *Integrity Reporting and Rewards/Punishments Management System*, which specifies management responsibilities, reporting and

investigation procedures, rights and obligations of whistleblowers, reward and punishment measures, reporting channels, etc.

- **Management responsibilities:** The Supervision Department is established under the Chairman Office, acting as an independent third party with dedicated authority to exercise supervision powers. It supervises the official acts of all current and former employees of the Company during their tenure, investigates and handles employees' suspected disciplinary violations, irregularities, and even illegal or criminal acts, and is responsible for the operation of reporting channels.
- **Handling procedures:** The Company's Supervision Department will contact whistleblowers within 24 hours of receiving a report and confirm the department responsible for the reported matter. If the reported information is verified as authentic after investigation, an investigation report will be issued. If the information is fraudulent, the investigation will be terminated immediately and filed.
- **Rights and obligations of whistleblowers:** All employees and external partners of the Company have the right to report any violations of regulations, disciplines, or laws, whether internal or external to the Company. Reports may be made either anonymously or under one's real name. The Company will strictly keep confidential whistleblowers' identity information and the content of reports, and maintains a "zero-tolerance" stance against retaliatory acts. Once retaliation is verified, the involved parties will be subjected to severe disciplinary action, with legal measures to be taken if necessary.
- **Reward and punishment measures:** To encourage internal and external personnel of the Company to participate in supervision and reporting, appropriate rewards will be given to whistleblowers who submit real-name reports and these reports are verified to be true by the Supervision Department. The Supervision Department shall be responsible for supervising, guiding, and tracking the implementation of such rewards. For personnel who are aware of violations but conceal or fail to report them, or who disrupt or obstruct investigation, necessary disciplinary actions will be imposed in accordance with the *Employee Discipline and Violation Management Regulations*.

- **Reporting channels:** The Company has established multiple reporting channels, including reporting hotline, reporting email, online platform, letter, and other ways, to monitor all types of incidents related to business ethics.
 - Reporting hotline: 021-51808616 or internal line 6616
 - Reporting email: jubao@jinkosolar.com
 - Online: "Integrity Jinko" on FabJinko, click on "I want to report - Online reporting"; OA system supervision portal
 - Letter: Supervision Department, Jinko's HQ Workplace, Lane 1466, Shen Chang Road, Minhang District, Shanghai, China (specify "Reporting")
 - Other ways: Contact the Supervision Department staff or report in person to the Company's Supervision Department staff

11. Breach Handling

The Company commits to conducting all its business activities in accordance with the principle of integrity. Should any violations of regulations, disciplines or laws be discovered, the Company will handle such incidents with stringent measures, and implement corresponding penalties and corrective actions.

For any person under investigation confirmed to have violated relevant laws and regulations or the Company's business ethics policies and regulations, the Company will require them to cease the relevant conduct immediately. Meanwhile, an in-depth investigation into the incident will be initiated, and upon completion of the investigation, an investigation report will be formulated. After being submitted to the Company's Disciplinary Committee for review, a preliminary handling opinion will be issued. Once approved and confirmed by the management, the opinion will be sent to the person under investigation for final confirmation. All reports received, investigation processes and results will be meticulously documented and preserved in both written and electronic formats, with a separate file established for each case.

For disciplinary and regulatory violations, the Company will impose corresponding penalties in accordance with the severity of the breaches with reference to the *Employee Discipline and Violation Management Regulations*, including warnings, demerits, demotions, termination of labor contracts, etc. Those suspected of illegal activities will be transferred to the judicial authorities for handling, or seek compensation for damages through legal proceedings to safeguard the Company's reputation and rights and interests. The Company also actively formulates corrective measures for disciplinary and regulatory violations, including optimizing internal control procedures, enhancing compliance training, deepening the construction of compliance systems, and strengthening compliance inspections, to prevent the recurrence of similar incidents.

五、 Intellectual Property Management

Jinko Solar attaches great importance to technological research, development and innovation, and continuously strengthens the protection of intellectual property for innovative technologies.

The Company strictly adheres to laws and regulations related to intellectual property management, establishes and improves relevant systems for intellectual property management, strengthens the reserve of technologies and patents, as well as the protection of intellectual property, and standardizes the processes for trademark application, maintenance, utilization and protection.

In research and development activities, the Company requires all employees to actively cooperate with the Intellectual Property Management Department in taking timely, effective, and appropriate intellectual property protection measures for research, development and innovation achievements.

In business activities, the Company standardizes the marking and display of intellectual property, provides necessary reminders to customers and relevant market entities, and clarifies the intellectual property rights, obligations, and confidentiality responsibilities of both parties in cooperation.

While ensuring effective protection of its own intellectual property, the Company also actively identifies potential infringement risks through self-assessment and other measures to avoid infringing on others' intellectual property.

六、 Tax Management

Jinko Solar upholds the tax management principle of "lawful compliance and timely declaration", strictly adheres to tax-related laws, regulations and legislative intent, and remains committed to lawful and honest tax payment in both business decision-making and daily operations.

The Company's tax management efforts are overseen by the Board of Directors as the highest decision-making and supervisory body. The release of relevant policies and commitments has been approved by the Company's Board of Directors and senior management. Under the supervision and participation of the Board of Directors and senior management, the Company has issued the *Tax Management System*, which further clarifies the basic principles of tax management, management responsibilities, transfer pricing mechanisms, planning and management mechanisms, tax declaration management, tax training management, etc., facilitating the continuous identification and mitigation of potential tax risks. Meanwhile, the Company makes the following commitments:

- Strictly abide by the tax-related laws, regulations and legislative intent of the countries/regions where business activities are conducted, and complete tax declaration and payment in accordance with the time nodes required by local laws and regulations.
- Determine the transfer pricing mechanisms in line with the arm's length principle, and set reasonable profit targets based on the functional risk positioning and the value creation ownership of business activities.
- Design transaction structures on the premise of ensuring compliance, and refrain from designing transaction structures that are solely for the purpose of tax avoidance.

- Conduct training on the latest tax laws, regulations and tax-related business knowledge for tax management personnel at least once a quarter to continuously improve their financial and tax management skills.

七、 Responsible Marketing

Jinko Solar commits to upholding the principles of integrity and responsibility in all advertising and marketing activities. The Company strictly prohibits any deceptive, misleading, false, or unfair practices, including the intentional omission of critical information. The Company adheres to clarity and authenticity in promotional content and ensures that all claims and statements are supported by sufficient and accurate factual evidence when responding to customer inquiries. Furthermore, the Company firmly opposes any form of language, audio, or visual representation that relies on stereotypes related to gender, religion, race, disability, or personal relationships. For advertising and marketing activities involving vulnerable groups, including children, the Company will prioritize the best interests of these groups and firmly avoid any advertising or marketing practices that may harm their physical or psychological development.

The Company commits to implementing transparent information communication in all business activities with customers. In accordance with applicable laws and regulations, the Company provides complete, accurate and easy-to-understand information in official or common languages during all sales activities, to help customers gain a comprehensive understanding of products. Prior to the confirmation of a transaction, the Company will communicate in detail with customers on critical information such as the total price of products and services, taxes and fees, applicable terms and conditions, and transportation costs, ensuring that customers can easily access and compare relevant content to make informed decisions.

The Company also commits to upholding the principle of fair contracting, ensuring that contracts are drafted in clear, easy-to-read, and comprehensible language, with all unfair terms strictly prohibited. Additionally, the Company will clearly specify product

information and transaction details in contracts to ensure that both parties to the transaction fully understand their respective rights and obligations.