Sustainable Product Management Policy of Jinko Solar

一、 Introduction

Jinko Solar Co., Ltd. (referred to as "Jinko Solar" or "the Company") strictly adheres to standards such as the *Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS) Directive* and the *Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation*, as well as regulations including the *Waste Electrical and Electronic Equipment (WEEE) Directive*. The Company actively promotes the sustainable management of the entire product life cycle, striving to minimize the negative impact of its products on the environment. The Sustainable Product Management Policy of Jinko Solar (referred to as "the Policy") aims to systematically standardize the Company's product management in aspects including product design and performance optimization, management and control of sustainable raw materials, reduction of production resource waste, product recycling and reuse, etc., thereby laying a solid foundation for the long-term development of the Company's sustainable product.[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 of the Company, as well as value chain partners (including service providers, suppliers, business partners, etc.) to adhere to the Policy and jointly advance sustainable product management. The Policy is applicable simultaneously to all business activities of the Company such as mergers and acquisitions and due diligence activities carried out

[1] In accordance with the EU Taxonomy, the Company is classified under the electrical and electronic equipment manufacturing industry. The Company's main business focuses on the manufacturing and sales of photovoltaic and energy storage equipment. All the Company's products are designed with characteristics such as long service life, suitability for reuse and remanufacturing, detachability, and recyclability. Therefore, 100% of the Company's operating revenue is classified as sustainable revenue.

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.

三、 Release Statement

The Company's sustainable product 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, 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、 Sustainable Product Life Cycle Management

Jinko Solar is deeply cognizant that sustainable development is not merely a social responsibility, but an inevitable path for the Company's long-term growth. The Company solemnly commits to advancing product design and R&D in strict adherence to ecological principles, continuously increasing the proportion of sustainable raw materials in procurement and utilization, constantly optimizing sustainable production and operational practices, actively advocating for sustainable consumption, and vigorously promoting end-of-life recycling and reuse. The Company commits to embedding the concept of sustainable development deeply into every stage of the product's full life cycle, generating greater ecological value for society, and contributing more significantly to a sustainable future for our planet.

1. Sustainable Product Life Cycle Management Framework

The Company has established a systematic full life cycle management framework for sustainable products, clarifying the responsibilities of competent departments at each stage and forming a complete management chain covering the entire product life cycle. The senior management of the Company is fully engaged in the management and

supervision of sustainable product. The Board of Directors serves as the highest management, supervision and guidance body for sustainable product. A special committee, the Strategy and Sustainable Development Committee, is established under the Board of Directors to represent the Board of Directors in exercising daily management, supervision and guidance responsibilities for sustainable product. The Company's Risk Compliance and ESG Management Committee is responsible for overall management of sustainable product. The Secretariat of the Risk Compliance and ESG Management Committee formulates strategies for sustainable product. The R&D and Technology System, Supply Chain Management System, Quality Management System, Operation Management System, Marketing System and other systems and departments related to sustainable product issues support the implementation of specific actions.

2. Sustainable Product Life Cycle Management Targets

To minimize the negative impact of its products on the environment, the Company commits to achieving over 80% third-party certification coverage for the carbon footprint of its products on sale by the end of 2025, and 100% coverage by the end of 2035. The Company also commits to ensuring that 100% of customers requesting product carbon footprint information receive such details annually, enabling them to comprehensively and accurately understand the carbon footprint of products and driving the entire industrial chain towards green and low-carbon transformation.

Additionally, the Company is actively advancing the circular economy and commits to achieving a 70% recycling rate for recyclable materials such as pallets and auxiliary fillers in production and transportation by the end of 2025, 80% by the end of 2026, and 90% by the end of 2028.

3. Sustainable Product Life Cycle Management Actions

The Company takes an active role in fulfilling its Extended Producer Responsibility (EPR), extending its resource and environmental responsibilities beyond the production

stage to encompass the entire product life cycle. This includes product design, circulation and consumption, recycling, and waste disposal. This commitment serves to build a sturdy foundation for sustainable development.

Throughout every stage of product life cycle management, the Company has consistently prioritized the management of its hazardous substances. The Company strictly complies with all environmental regulations and related requirements such as the *Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation*, while continuously improving its environmental management system. Guided by the principle of harmonious coexistence with the environment, the Company conducts its production activities and commits to providing society with high-quality eco-friendly products.[2]

The Company adheres to a four-step process of "Hazard Identification - Risk Analysis - Risk Assessment - Risk Control" for the management of hazardous substances. During the identification phase, the Company systematically catalogs all hazardous substances involved in the product life cycle, creating a detailed inventory that specifies chemical names, CAS numbers, and primary application stages. The risk analysis phase employs in-depth multi-dimensional evaluations encompassing likelihood of occurrence, frequency of exposure, and severity of consequences. In risk assessment, the Company quantifies risks through likelihood of occurrence and severity of consequences metrics, constructing a risk matrix to prioritize management actions. For risk control, the Company implements a tripartite control strategy focusing on source prevention, process monitoring, and end-treatment, establishing a comprehensive risk mitigation framework. Regular risk assessments for hazardous substances are conducted, with supplementary evaluations initiated promptly in the event of new chemical introduction, raw material supplier changes, production process adjustments, updates to regulatory standards.

[2] Photovoltaic products are subject to the *Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation*. Generally, 100% of the operating revenue in these products containing REACH-regulated substances, with their content strictly maintained within the threshold limits specified by REACH. The Company has proactively advanced REACH certification, and relevant reports indicate that all types of substances involved in the certification process fully comply with regulatory requirements.

Control measures are dynamically optimized based on assessment outcomes to ensure risks remain within acceptable limits.[3]

3.1 Optimization of Product Design and R&D

The Company strictly manages all hazardous substances involved in its products in accordance with legal and regulatory requirements, and gradually eliminates, reduces or replaces such substances, or makes relevant technical reserves, based on market conditions, to continuously mitigate potential environmental hazards. Meanwhile, the Company constantly optimizes product design and performance, and solidly advances product technical reserves, laying a solid foundation for sustainable product design and R&D.

- **Advance hazardous substance substitution:** The Company commits to controlling hazardous substances used in all aspects of product design, R&D, production and manufacturing in accordance with legal and regulatory requirements, and establishing management ledgers. Meanwhile, the Company commits to complying with the *Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS) Directive* and the *Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation*, allocating R&D resources and budgets to eliminate for substances such as mercury, cadmium, and fluorine used in the entire product life cycle, and reduce or replace for substances such as lead and DEHP. The Company commits to actively cooperating with industry associations to develop solutions for eliminating, reducing and replacing hazardous substances based on industry standards and market conditions, thereby establishing technical reserves. The Company is continuously exploring the adoption of hazardous substance-free materials such as fluorine-free backsheets, lead-free ribbons and water-based fluxes, thereby reducing potential environmental pollution.
- **Implement detachable and recyclable design:** The Company commits to adopting internationally standardized design and connection methods, optimize product

[3] In 2024, the shipment volume of the Company's REACH-certified products accounted for over 90% of the total annual shipments. This means that at least 90% of the products have undergone hazardous substance risk assessments.

structure and apply modular design. This helps simplify the disassembly process, improve the component recycling rate, and provides support for reducing the product's environmental footprint from the source of R&D and design. By virtue of segmented and integrated frame designs, the Company can achieve 100% detachable recycling of aluminum frames.

3.2 Enhancement of Sustainable Raw Materials Procurement and Utilization

The Company commits to deeply integrating the concept of sustainable development into the entire process of raw material management. By establishing a close cooperation mechanism for sustainable raw materials with supply chain partners, the Company strives to reduce the potential negative impacts of raw materials on environmental and social sustainable development throughout their life cycle. The Company announces following policies and commitments:

- Integrate environmental impact and social value assessments into the entire procurement process, control potential negative effects arising from raw material procurement activities at the source, and realize the sustainable transformation of the procurement process.
- Proactively engage with internal and external stakeholders to jointly explore application pathways and best practices for sustainable raw materials, ensuring that raw materials strictly comply with international and industry environmental standards throughout procurement, storage, usage, and other processes.
- Continuously increase the proportion of raw materials verified by third-party institutions, ensuring the legality, environmental friendliness, and sustainability of raw material sources from a qualification perspective.
- Strengthen the application of recyclable and reusable raw materials, reduce waste discharge and pollutant generation in the production process through material innovation, and promote the implementation of a circular economy model.

- Strictly avoid procuring raw materials from globally or nationally significant biodiversity conservation areas, and safeguard ecological balance and biodiversity through concrete actions.

The Company's sustainable procurement 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. To fulfill the aforementioned commitments, the Company has actively formulated a raw material sustainability plan from dimensions such as priority determination and origin traceability, ensuring that the negative impacts of procurement activities on the environment and society are minimized.

- **Implement raw material priority assessment:** Adhering to the concept of green environmental protection, the Company promotes the sustainable development of the supply chain from the source. The Company actively assesses the priority order of raw material usage, giving preference to raw materials with less impact on the environment and society, as well as raw material suppliers that emphasize environmental protection, adopt clean energy, and reduce waste emissions during the production process.

- **Ensure material traceability:** The Company has established a vertically integrated product traceability management system spanning from the supply chain to end clients. Leveraging digital traceability systems and product barcode labels, the Company manages key data covering the products' entire process from key raw materials to finished product inspection and certification, which ensures production compliance and full life cycle traceability.

- **Mitigate environmental and social impacts of raw material production:** To mitigate relevant impacts in the supply chain, the Company has implemented a rigorous supply chain ESG audit program. The audit scope covers key issues such as supplier ESG management system, compliant employment (including prohibition of child labor and forced labor etc.), anti-discrimination and anti-harassment, remuneration and benefits, working hours, occupational health and safety, environmental protection, business ethics (including anti-corruption etc.), freedom of

association and collective bargaining, etc. Procurement strategies are adjusted based on audit results to ensure the minimization of negative environmental and social impacts arising from raw material production.

- **Introduce renewable, recyclable, and low-carbon materials:** The Company continuously increases the proportion of recyclable, renewable, and third-party-verified raw materials used, and actively explores new types of low-carbon and environmentally friendly alternative materials to reduce the negative environmental impact of the raw materials and products. The Company commits that the proportion of recycled lithium metal used in the raw materials of battery products will be no less than 6% by the end of 2030, and the proportion will be no less than 12% by the end of 2035.

- **Ecosystem co-construction:** The Company, in collaboration with ecosystem partners, has jointly released the Global Solar Sustainable Alliance (GSSA). Specific action directions have been proposed for the three core areas of "Just Transition", "People-Centricity", and "Improved Governance" in the GSSA. The Company encourages more ecosystem partners to join this initiative to jointly build a transparent and trustworthy supply chain ecosystem.

- **Conduct sustainable supply chain training:** The Company places great emphasis on the training and education of employees, particularly internal procurement staff of the Company, in sustainable procurement practices (including issues related to sustainable raw materials). Through a combination of training and practical exercises, the Company aims to enable employees to better understand and implement supply chain management strategies, thereby jointly advancing green development throughout the upstream and downstream industrial chains.

3.3 Improvement of Product Manufacturing

The Company strictly adheres to national and local regulations and standards regarding environmental protection, safety, etc. The Company continuously refines production processes, vigorously advances intelligent transformation, and promotes the in-depth

application of clean production technologies. By adopting advanced treatment technologies for waste gas and wastewater, the Company effectively reduces energy and resources consumption as well as pollutant emissions. The Company emphasizes the effective implementation of the "Reduce, Reuse, Recycle" (3R) principle in waste disposal processes, building a comprehensive and efficient recycling mechanism. Meanwhile, the Company actively advocates and promotes improvements in the recycling and reuse rate of various packaging materials, aiming to fully realize the greenization and high efficiency of the production process. In the production phase, the Company has introduced recyclable packaging materials such as cardboard boxes, wooden pallets, and biodegradable foam. The Company has also implemented recycling and reuse programs for battery chip packaging materials and silicon wafer wooden pallets. These measures have effectively boosted the recycling rate of packaging materials and continuously reduced the consumption of redundant materials.

3.4 Advocacy of Sustainable Consumption

The Company continues to strengthen green management across product transportation and warehousing. The Company optimizes logistics routes, pilots new energy vehicles such as hydrogen and electric models, and prioritizes strategic logistics partnerships with shipowners that embrace green practices. Combined with intelligent warehousing facilities, these measures enable the Company to continuously reduce energy consumption and greenhouse gas emissions. The Company provides customers with clear product instructions covering installation, operation, maintenance, and tips for enhancing efficiency and extending service life, supporting customers in using energy efficiently and minimizing waste. The Company actively communicates the greenhouse gas emission reduction value of its products to customers, advocates green consumption through case studies, and encourages the choice of clean energy products. Additionally, the Company continuously improves its service system, incorporates customer feedback to improve products, assists customers in practicing sustainable consumption, and jointly promotes energy transition and carbon neutrality.

3.5 Promotion of Product Recycling and Reuse

As a global member of international recycling organizations such as PV Cycle, the Company actively fulfills its Extended Producer Responsibility (EPR), fully undertaking responsibilities for the recycling, reuse, and waste management of products at the end of their life cycle.

The Company has established a comprehensive product sales database, which records key data such as the sales time, location, customer information, and product model of each batch in detail, providing a solid data foundation for WEEE (Waste Electrical and Electronic Equipment) tracking. Meanwhile, the Company continuously optimizes the WEEE recycling management process to timely grasp the dynamics of WEEE recycling and provide strong support for subsequent decision-making.

The Company promotes WEEE recycling through diversified initiatives. The Company actively expands recycling channels and provides customized recycling services including "reuse" and "recycling" models according to customer needs to increase WEEE recycling coverage. With reference to the *Waste Electrical and Electronic Equipment (WEEE) Directive*, the Company has set an annual management target that "85% of WEEE should be recycled and 80% of WEEE should be prepared for reuse or recycling".

The Company has formulated strict screening criteria for WEEE recipients, requiring partners to possess relevant qualifications and certifications for product recycling. The Company gives priority to enterprises with a good reputation in the industry, advanced technologies, and sound environmental protection measures as partners. When signing cooperation agreements with WEEE recipients, the Company clearly specifies various standards and requirements for electronic waste management, demanding that partners strictly comply with relevant laws, regulations, and industry standards to ensure no environmental pollution during the recycling process and maximize resource recovery and utilization.

Additionally, the Company has specified WEEE-related recycling standards in sales contracts involving WEEE and provides customers with irregular training and empowerment. These efforts aim to help customers fully understand recycling

requirements, enhance recycling awareness, and form a closed-loop management model of "enterprise-led, customer-collaborated".