
Human Rights Management Policy of Jinko Solar

一、 Introduction

Jinko Solar Co., Ltd. (referred to as "Jinko Solar" or "the Company") has formulated the Human Rights Management Policy of Jinko Solar (referred to as "the Policy") in accordance with international initiatives and standards such as the *Universal Declaration of Human Rights*, the *International Labor Organization Conventions*, the *United Nations Guiding Principles on Business and Human Rights*, the *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*, etc. The Policy clarifies the Company's various commitments, principles, and stances in human rights management. The Company commits to prohibiting all forms of human trafficking, forced labor or modern slavery, the use of child labor, and discrimination and harassment. The Company also commits to respecting and protecting employees' rights in key human rights areas, including but not limited to working conditions (such as reasonable working hours, fair compensation and benefits, occupational health and safety, training and development, labor-capital communication channels, etc.), freedom of association, collective bargaining, etc. The Company shall earnestly safeguard the legitimate rights, interests and dignity of its employees.

二、 Scope of Application

The Policy applies to all business and operational activities of the Company and its subsidiaries, including production and operation facilities, business facilities, products and services, distribution and logistics, waste management, etc., which are directly or indirectly controlled or operated by the Company or its subsidiaries. It also encourages all directors, senior management, and employees of the Company (including full-time employees, part-time employees, contractors, etc.), as well as value chain partners (including service providers, suppliers, contractors, etc.) to adhere to the Policy and jointly respect and protect human rights. The Policy also applies to other key business

partners (including distributors, consultants, outsourcing partners, etc.). 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

三、 发布声明 Statement

The Policy is compiled by the Risk Compliance and ESG Management Committee. The release of relevant policies and commitments has been approved by the Company's senior management and employees of the business focal department. 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 Chinese and English versions. Any inconsistency between the Chinese and English versions, the Chinese version shall prevail.

四、 Commitments and Actions for Human Rights

1. Employees of the Company

The Company respects and protects the basic rights and interests of employees. The Company explicitly commits to prohibiting all forms of human trafficking, forced labor or modern slavery, the use of child labor, and discrimination and harassment. The Company also commits to respecting and protecting employees' rights in key human rights areas, including but not limited to working conditions (such as reasonable working hours, fair compensation and benefits, occupational health and safety, training and development, labor-capital communication channels, etc.), freedom of association, collective bargaining, etc. The Company adopts a "zero-tolerance" stance towards all acts of human rights violations and commits to protecting the fundamental rights and interests

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

of every employee through following dimensions, and earnestly safeguarding their legitimate rights, interests and dignity.

- **Prohibition of forced labor:** The Company prohibits all forms of forced labor and modern slavery, including the refusal to accept or use bonded labor, indentured labor, enslavement, or human trafficking. The Company does not employ prison labor, and explicitly prohibits requiring job applicants to pay recruitment fees for employment. The Company shall not recruit or hire personnel through violence, threats, fraud, detention of documents, collection of deposits or guarantees, etc. The Company explicitly prohibits imposing unreasonable restrictions on employees' freedom of movement within the workplace or their departure from the Company.
- **Prohibition of child labor:** The Company strictly prohibits the employment of child labor. Through measures such as identity document verification, routine on-site inspections, social responsibility training, etc., the Company prevent any incidents of child labor employment. Additionally, the Company has proactively established a child labor rescue mechanism, which is detailed in the *Child Labor and Juvenile Workers Management Procedure*, to ensure the effective operation of child labor rescue and control procedures and the effective prevention of child labor risks.
- **Anti-discrimination and anti-harassment:** The Company's *Anti-Discrimination Management Procedure* clarifies the principles of equal employment opportunity, diversity, equity, and inclusion (DEI), ensuring that employees are protected from any form of discrimination or unfair treatment across all human resources management processes (including but not limited to recruitment, compensation and benefits, training, promotion, dismissal, and retirement). This protection applies regardless of race, caste, color, gender, nationality or place of origin, national or social origin, property or economic status, religion, age, language, disability, pregnancy, sexual orientation, marital or family status, political affiliation, trade union membership, regional or tribal origin, etc. The Company strictly prohibits any form of unfair treatment, including violence, humiliation, and harassment, with specific prohibition of sexual harassment and sexual violence.

- **Good working conditions:** In its business activities, the Company strictly complies with laws, regulations and standards related to labor rights, occupational health and safety, etc., formulated by the governments of its operational locations. It ensures that employees enjoy work conditions conforming to relevant norms and standards, as well as a safe and healthy working environment. The Company also guarantees on-time and full payment of wages, and provides and gradually improves diversified welfare benefits. Additionally, the Company provides employees with diversified skills and competency enhancement training, development platforms and opportunities to support their joint growth with the Company.

(1) Working hours management: The Company has formulated the *Attendance Management System*, which clearly stipulates employees' working hours and attendance. Based on the job characteristics, the Company has adopted three main working hour systems, including the standard working hour system, the comprehensive working hour system, and the non-fixed working hour system. The Company also ensures that these systems have obtained official approval. Through online monitoring of employees' scheduling and attendance data, the Company ensures that work schedules could meet daily operational needs with reasonable working hours. The Company commits to prohibiting forced overtime, requiring employees to go through an overtime application process beforehand, specifying the reasons for and content of the overtime work, and obtaining the approval of employees' supervising leaders. The Company will provide corresponding overtime allowances or compensatory time off based on the actual circumstances.

(2) Compensation management: The Company commits to strictly complying with the laws and regulations of all its operating locations, ensuring 100% equal pay for equal work and that employees receive a competitive living wage. To fulfill this commitment, the Company regularly monitors salary data such as "average male-female salary" and "male-female salary median" to understand the gender salary gap, which is publicly disclosed in the annual ESG reports. The Company has formulated the *Employee Basic Living Conditions Survey*

Procedure and conducts surveys on employees' basic living conditions by combining public data analysis with internal employee survey. These surveys cover essential needs including food, nutrition, water, housing, education, healthcare, transportation, clothing, and other key needs (such as necessities required for unforeseen events, etc.). The basic living conditions survey data is then compared with the public data on living wages. The Company incorporates the research findings and analysis conclusions into its annual salary adjustment and special salary adjustment plans to ensure that employees' compensation is both equitable and competitive.²

(3) Benefits management: The Company promises that all employees are entitled to equal benefits, and shall receive normal compensation and benefits during legally entitled benefit leaves (including legally mandated paid leave, etc.). To fulfill this commitment, the Company has formulated the *Benefits Management System*, which clearly stipulates various benefits for all full-time employees within Mainland China, including statutory benefits, health guarantee benefits, incentive benefits, festival and cultural development-oriented benefits, and life security benefits. For overseas employees, the Company clearly stipulates the contents and measures of distinctive benefits in the local special *Benefits Management System*. The *Benefits Management System* clearly stipulates that employees are entitled to legally benefit leaves (including legally mandated paid leave, etc.), while the *Attendance Management System* clearly stipulates the number of legally entitled benefit leaves and the application process. The Company also actively expands the coverage of employees' social protection beyond public programs through initiatives such as customized commercial insurance plans, personalized festival benefit packages, and emergency assistance programs for employees facing hardships.

² In 2024, the Company has conducted surveys on employees' basic living conditions at several bases. The survey data shows that the minimum monthly take-home pay of employees is far higher than the data from the basic living conditions survey, which is sufficient to meet employees' basic living needs.

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- (4) Training and development:** The Company is dedicated to building fair and transparent career promotion paths, providing personal development and career planning paths accessible to all employees, and ensuring that employees' efforts and talents are fully recognized and rewarded. The Company allocates abundant learning resources for employees in different positions, offers customized training courses and development guidance tailored to employee needs, striving to build a diverse, inclusive, and learning-oriented organization.
- (5) Occupational health and safety:** The Company adheres to the production safety principle of "Safety First, Prevention Foremost, Comprehensive Management" and is dedicated to creating a safe and healthy working environment for all employees and stakeholders. The Company commits to safeguarding employees' occupational health and safety through systematic and standardized management. The Company integrates occupational health and safety requirements across all business segments and negotiates with employees on the update of relevant systems and management measures to enhance participation of all employees.
- **Respect for freedom of association and collective bargaining:** The Company respects employees' rights to freely assemble and associate, join trade unions, and conduct collective bargaining in accordance with the laws and regulations where it operates. The Company's trade unions have signed collective agreements with the Company. Such collective agreements cover areas including but not limited to occupational health and safety, working conditions, career management and training, equality and diversity, anti-discrimination and anti-harassment, care for female employees, etc. The Company holds regular Workers' Congress to conduct face-to-face consultations on issues such as occupational health and safety, working conditions, career management and training, equality and diversity, anti-discrimination and anti-harassment, care for female employees, etc. These measures ensure that employees' demands receive prompt responses and feedback through institutionalized channels.

- **Labor-capital communication:** The Company has built open, trusting, and unimpeded two-way communication channels for internal employees. Through channels such as "U-talk with Executives", "Jinko Sunny Day", and "Workers' Congress", the Company solicits and incorporates employees' suggestions and feedback. Moreover, before implementing major personnel changes (such as factory shutdowns, production halts, relocations, or large-scale staff adjustments), the Company sets a minimum notification period, gives timely notice to its employees in advance of such personnel changes, and provides prompt consulting support, ensuring its employees have sufficient time to handle personal affairs and plan their career development. These measures help mitigate the significant adverse impacts of major personnel changes on employees.

2. Employees of Suppliers

The Company requires all of its suppliers and their upstream suppliers to strictly comply with international initiatives and standards such as the *Universal Declaration of Human Rights*, the *International Labor Organization Conventions*, the *United Nations Guiding Principles on Business and Human Rights*, the *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*, etc., and urges them to actively manage their ESG performance in aspects such as human rights, labor practices (including reasonable working hours, fair compensation and benefits, occupational health and safety, training and development, labor-capital communication channels, etc.), to avoid or mitigate social responsibility risks in business activities. For direct suppliers, the Company requires them to formulate relevant policies and operational commitments by referring to the Company's own human rights commitments and action requirements applicable to the employees. The Company conducts regular ESG audits on direct suppliers to ensure their management and practices regarding workers' human rights meet its standards.

- **Labor rights and labor practices:** The Company requires its suppliers to ensure that each of their employees enjoy basic labor rights. Suppliers must not employ or use child labor in any form, must not engage in human trafficking, and must not tolerate forced labor. All forms of harassment, abuse, and employment

discrimination are strictly prohibited. Suppliers must safeguard their employees' equal rights, including the legal rights to join trade unions, freedom of association and collective bargaining, etc. Suppliers shall ensure that each of their employees has the freedom of movement and protect their employees' freedom of speech and expression. Additionally, suppliers shall ensure that each of their employees has reasonable working hours and receives adequate rest periods and provide each of their employees with equal compensation and benefits, a living wage, and legally mandated paid leave. The Company also requires its suppliers to establish unimpeded internal communication channels for labor-capital issues to ensure employees' suggestions and feedback are promptly solicited and incorporated. Moreover, the Company also requires its suppliers to give timely notice to their employees in advance of implementing major personnel changes (such as factory shutdowns, production halts, relocations, or large-scale staff adjustments) and provide prompt consulting support, ensuring their employees have sufficient time to handle personal affairs and plan their career development.

- **Diversity and skills training:** Suppliers shall establish a diverse and inclusive organizational culture, respecting and protecting the legitimate rights and interests of vulnerable groups such as female employees, ethnic minorities, employees with disabilities, etc. Additionally, suppliers shall provide their employees with equal skills training and career promotion opportunities.
- **Occupational health and safety protection:** The Company requires its suppliers to strictly comply with occupational health and safety-related laws and regulations, establish a comprehensive occupational health and safety production management system, and provide employees with a safe and healthy working environment. Additionally, the Company requires its suppliers to pay attention to the mental health of employees and enhance team cohesion. The Company also actively conducts occupational health and safety-related training for suppliers, helping them enhance their management capabilities and reduce the occurrence of safety accidents.
- **Responsible mineral due diligence management:** Suppliers shall comply with the Company's conflict minerals management requirements, actively cooperate with the

Company in promoting responsible minerals management, ensure that all the 3TG minerals (Tantalum, Tin, Tungsten and Gold) they used are not sourced from conflict-affected and high-risk areas (CAHRA) involving serious human rights violations, illegal trade, and financing of violent activities. Meanwhile, suppliers shall pay extra attention to the sources of minerals such as cobalt, mica, and silicon, ensuring that they do not involve risks of human rights violations, fueling conflicts, breaching business ethics, or causing other adverse effects.

3. Other Stakeholders

Based on the comprehensive control of human rights risks in self-operated systems and supply chain enterprises, the Company continuously convey the concept of human rights protection in-depth to all partners within the ecosystem, and is committed to building an inclusive and equal business environment.

- **Requirements for partners' human rights and labor practices:** Beyond suppliers, the Company also encourages other value chain partners (including service providers, contractors, etc.) and other key business partners (including distributors, consultants, outsourcing partners, etc.) to formulate special policies covering basic labor human rights and labor practices (including reasonable working hours, fair compensation and benefits, occupational health and safety, training and development, labor-capital communication channels, etc.) with reference to the human rights commitments and action requirements that apply to the Company's and its supply chain enterprises' employees. The other value chain partners and key business partners shall also establish supporting operational procedures to ensure their business activities align with international human rights standards and corporate social responsibility norms.
- **Respect for indigenous rights:** The Company adheres to the *United Nations Declaration on the Rights of Indigenous Peoples*, earnestly respecting the legal rights of community residents in its business operation areas. While safeguarding the livelihood development of residents (especially specific groups such as children, persons with disabilities, indigenous peoples, vulnerable groups, etc.), the Company upholds the philosophy of respecting cultural diversity and promoting cultural

inclusion, and assists local residents in sharing the achievements of economic, social, and cultural development through systematic measures.

- **Empowering ecosystem partners:** The Company supports the just and inclusive energy transition, helping ecosystem partners access more clean and affordable energy as well as green and decent job opportunities through technological advancement and business growth, thereby assisting ecosystem partners in enhancing their quality of life and well-being.

五、 Human Rights Due Diligence Procedure

To systematically identify, prevent, mitigate, and report human rights-related risks across the Company's global activity chain, and to respect and protect the rights and interests of key stakeholders, the Company has formulated the Human Rights Due Diligence Procedure with reference to the *United Nations Guiding Principles on Business and Human Rights*, ensuring effective control over all human rights-related risks.

- **Governance structure:** The senior management of the Company is fully engaged in human rights risk management and due diligence. The Board of Directors serves as the highest management, supervision and guidance body for human rights risk management and due diligence. 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 human rights risk management and due diligence. The Company's Risk Compliance and ESG Management Committee is responsible for the overall management of human rights risk and due diligence. The Secretariat of the Risk Compliance and ESG Management Committee formulates human rights risk control and due diligence targets and plans. The Human Resource System, Supply Chain Management System, and other departments related to human rights issues support the achievement of specific targets and the implementation of actions.
- **Policies and systems:** The Company continuously improves the development of human rights-related policies and systems, publicly issues the Human Rights

Management Policy and the Sustainable Procurement Policy, and formulates a series of internal systems on human rights-related themes, such as the *Child Labor and Juvenile Workers Management Procedure*, the *Regulations on Prohibition of Forced Labor and Prison Labor*, the *Regulations on Protection of Female Employees*, the *Regulations on Trade Unions and Freedom of Association Management*, the *Anti-Discrimination Management Procedure*, the *Procedure for the Prevention of Punitive Control*, the *Religious Beliefs Management Procedure*, etc. These documents clarify the control methods and procedures for key human rights issues.

- **Risk assessment and actions:** The Company has fully integrated human rights due diligence into its risk management system, covering business and operational activities of the Company and its subsidiaries, value chain or other activities related to the Company's business, and new business relations (including mergers, acquisitions, joint ventures, etc.). The human rights due diligence of the Company covers issues including but not limited to those mentioned in the "Commitments and Actions for Human Rights" section, such as forced labor, human trafficking, child labor, freedom of association, right to collective bargaining, discrimination, working conditions (including reasonable working hours, fair compensation and benefits, occupational health and safety, training and development, labor-capital communication channels, etc.). The human rights due diligence of the Company covers groups including but not limited to the Company's employees, third-party employees, child laborers and juvenile workers, women and vulnerable groups, migrant workers, indigenous peoples, local communities, etc. The Company commits to ensuring 100% coverage of human rights risk assessments for its own operations and key suppliers starting from 2024.

(1) Risk identification: The Company employs a multi-dimensional integrated approach to human rights risk identification, using legal and regulatory compliance requirements (such as the *International Labor Organization Conventions* and local labor laws) as benchmarks, systematically reviewing internal policies, systems, and procedures, and capturing diverse demands through stakeholder engagement mechanisms (such as employee surveys,

community interviews, supplier questionnaires, etc.). On this basis, the Company uses risk mapping tools to conduct systematic assessments of potential human rights issues, and develops human rights risk heat maps in conjunction with specific business scenarios (such as self-operations, value chain, new business relationships, etc.), ensuring that the human rights risk identification process covers all tiers of the activity chain and potential human rights impact areas. The Company conducts an annual review of human rights risks to ensure the timeliness and applicability of the identified potential risks.

(2) Risk assessment and prioritization: After identifying potential human rights risks, the Company assesses each risk from two dimensions: impact materiality (including the likelihood of impact, scale, scope, and irreparability) and financial materiality (including the likelihood and degree of financial impact), thereby determining the comprehensive impact level. Based on the assessment results, the Company prioritizes each identified risk, identifies high-risk areas and critical business processes, providing a basis for formulating targeted action plans.

(3) Action plan development: For the identified potential human rights risks, especially those associated with high-risk areas and critical business processes, the Company formulates detailed action plans. The action plans specify responsible departments, concrete measures, timelines, and expected outcomes to ensure effective mitigation or elimination of human rights risks. The action plans include improving supply chain ESG management, enhancing training for employees and stakeholders, implementing community engagement projects, etc.³

(4) Due diligence implementation: The Company conducts human rights due diligence through various forms, including on-site investigations, document reviews, interviews, audits, etc., to collect solid evidence and data supporting

³ In 2024, the Company launched human rights risk mitigation programs covering all operational scopes and key suppliers, involving more than 10 global production bases and 113 key suppliers.

risk assessment and formulation of action plans. Among these, audits serve as the primary method for the Company's human rights due diligence. At the self-operation level, the Company continuously promotes internal audits and third-party audits of production bases in accordance with the *ESG Audit Management System* and the *ESG Audit Checklist*. At the supply chain level, the Company has established a supplier ESG audit system combining both online and on-site audits, as well as second-party and third-party audits, to continuously audit suppliers' ESG performance. The ESG audits of the Company cover issues including but not limited to those mentioned in the "Commitments and Actions for Human Rights" section, such as forced labor, human trafficking, child labor, freedom of association, right to collective bargaining, discrimination, working conditions (including reasonable working hours, fair compensation and benefits, occupational health and safety, training and development, labor-capital communication channels, etc.).

(5) Continuous improvement and action monitoring: The Company has established a normalized mechanism for human rights risk improvement and action monitoring, regularly reviewing and evaluating the implementation of actions. Through continuous improvement and action monitoring, the Company has effectively prevented and controlled various human rights risks.⁴

(6) Remedial measures: The Company has established a sound remedial mechanism for human rights violations. For violations verified through investigation, graded responses will be implemented based on the severity of their impact. Remedial measures include, but are not limited to, ordering apologies, issuing verbal warnings, conducting public criticism, requiring economic or non-economic compensation, and terminating labor contracts in

⁴ The Company's human rights risk prevention and control are effective. In 2024, within its own operations, no material significant risks were identified in internal and external audits of all the Company's bases. 95.2% of the identified non-conformities were rectified and closed within six months. For individual items that are difficult to rectify in the short term, continuous follow-up will be conducted to ensure closure. In the supply chain, the overall ESG risks of suppliers are under control. Only 3 suppliers failed to meet the Company's ESG management standards, and continuous urging for improvement and organization of re-audits will be carried out.

accordance with laws. For violations causing material impacts, the Company will formulate special rectification plans and carry out full-process follow-up to ensure the effective implementation of remedial measures, striving to minimize negative impacts of human rights risks. Additionally, the Company proactively organizes non-periodic human rights-themed training for senior management, employees, suppliers, and other key stakeholders. Through diversified forms such as case studies and interactive discussions, the training aims to continuously strengthen stakeholders' awareness of the importance of human rights issues and enhance their consciousness and practical capabilities in human rights protection.⁵

(7) Stakeholder communication: The Company has established a human rights due diligence information disclosure mechanism to summarize and review the progress and results of human rights due diligence every year. The Company hopes to enhance communication and exchanges with stakeholders through detailed human rights due diligence information disclosure. The Company publicly discloses the progress of human rights compliance management in the annual ESG report, so that stakeholders can understand the current status of the Company's human rights compliance management.

六、 Grievance Mechanism

The Company provides formal and public feedback channels (reporting email: jubao@jinkosolar.com) to internal and external stakeholders, and encourages stakeholders to actively identify and report risks. All of the Company's directors, senior management, employees (including full-time employees, part-time employees, contractors, etc.), value chain partners (including service providers, suppliers, contractors, etc.), as well as any other stakeholders (including distributors, consultants, outsourcing

⁵ The Company has effectively implemented warning education for human rights violations. In 2024, the Company neither caused nor direct and indirect contributed to any major human rights violations.

partners, etc.) can report any formal or potential non-compliance issues to the Company through these feedback channels, either anonymously or with real names.

The Company's feedback channels have been disclosed in the Policy and other public and transparent channels to ensure accessibility for internal and external stakeholders. Upon receiving a report, the Company's Human Resource System will promptly review the content of the reported issues. For issues confirmed to fall within the purview of the Human Resource System, a dedicated staff member will be assigned to conduct an investigation. If the investigation confirms the report to be untrue, the investigation will be immediately terminated and archived. If the report is confirmed to be valid, it will be processed through a hierarchical review mechanism until the issues are effectively resolved.

To better protect the privacy of reporters, the Company has established a dedicated internal procedure for reported cases, ensuring that reported issues are only known to the reporter, the recipient, and personnel involved in the reported cases. The content of reported issues will be kept confidential to the greatest extent permitted and feasible by law. The Company maintains zero tolerance for any discriminatory or retaliatory behavior, and strictly prohibits any form of retaliation.