

晶科能源负责任矿产供应链尽职管理政策

Responsible Minerals Supply Chain Due Diligence Policy of Jinko Solar

一、概述 Introduction

晶科能源股份有限公司（以下简称“晶科能源”或“本公司”）参考《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》（第三版）（以下简称《OECD 尽职调查指南》）、《中国负责任矿产供应链尽责管理指南》（第二版）、《多德-弗兰克华尔街金融改革与消费者保护法》（以下简称《多德-弗兰克法案》）第 1502 条、《欧盟冲突矿产法规》等国内国际倡议和标准要求，制定晶科能源负责任矿产供应链尽职管理政策（以下简称“本政策”），对矿产供应链负责任管理提出明确的要求，并要求所有供应商及其上游供应商严格遵守且积极践行。

Jinko Solar Co., Ltd. (referred to as "Jinko Solar" or "the Company") has formulated the Responsible Minerals Supply Chain Due Diligence Policy of Jinko Solar (referred to as "the Policy") with reference to domestic and international initiatives and standards such as the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)* (referred to as "the *OECD Due Diligence Guidance*"), the *Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition)*, Section 1502 of the *Dodd-Frank Wall Street Reform and Consumer Protection Act* (referred to as "the *Dodd-Frank Act*"), and the *EU Conflict Minerals Regulation*. The Policy sets out clear requirements for the responsible management of the minerals supply chain and requires all suppliers and their upstream suppliers to strictly comply with and actively implement it.

二、适用范围 Scope of Application

本政策规定适用于本公司及旗下分子公司的所有业务与运营活动，并鼓励本公司所有董事、高级管理层及员工，以及价值链伙伴（包括服务提供商、供应商、承包商等）遵循本政策，共同推动矿产供应链负责任管理。本政策亦适用于其他关键业务伙伴（包括经销商、顾问、外包伙伴等）。本政策规定同时适用于本公司在全球范围内开展的兼并、并购等商业活动及尽职调查活动。本公司亦承诺对非控股合资企业施加影响，敦促其根据本政策相关规定行事。

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, contractors, etc.) to adhere to the Policy and jointly promote the responsible management of the minerals supply chain. 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.

三、发布声明 Release Statement

本公司矿产供应链负责任管理工作由董事会作为最高决策和监督机构，相关政策与承诺的发布已得到本公司董事会和高级管理层的认可。一般情况下本政策调整周期为一年一次，以确保政策的时效性与适用性。本政策以中文和英文版本制备，若中英文版本不一致的，以中文版本为准。

The Company's responsible management efforts of the minerals supply chain 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、负责任矿产供应链尽职管理承诺与行动 Responsible Minerals Supply Chain Due Diligence Commitments and Actions

晶科能源认识到，供应链上如有企业在受冲突影响和高风险地区从事矿产资源开采、运输、贸易、处理、出口等活动，整个供应链将可能面临实际的或潜在的重大不利影响的风险，并认识到自身及供应链伙伴均负有尊重人权、不助长冲突、不对环境和社会产生不利影响的义务。本公司承诺坚决不采购、使用来自受冲突影响地区的矿产，不与涉及受冲突影响地区采购活动或与之相关联的供应商开展合作。本公司认为，供应链伙伴应当共同遵守可持续发展原则，携手推进矿产供应链负责任管理。

Jinko Solar recognizes that the entire supply chain may face actual or potential significant adverse impacts if any enterprise in the supply chain engages in mineral resources extraction, transport, trade, handling and export, or other activities in conflict-affected and high-risk areas. The Company also acknowledges that both itself and its supply chain partners have the obligation to respect human rights, not fuel conflicts, and avoid causing adverse environmental and social impacts. The Company commits to resolutely refraining from procuring or using minerals originating from conflict-affected areas, and will not cooperate with suppliers that are involved in or associated with procurement activities related to such areas. The Company believes that supply chain partners should jointly abide by the principles of sustainable development and work together to promote the responsible management of the minerals supply chain.

为进一步规范本公司矿产供应链负责任管理，识别、防范、降低和消除可能侵犯人权、助长冲突、违反商业道德或造成其他不利影响的风险，本公司立足人权管理政策及可持续采购政策框架下负责任矿产供应链尽职管理的具体规定，补充发布本政策，将负责任矿产供应链尽职管理覆盖的矿产类型拓展为 3TG（钨、锡、

钽、金）、钴、云母（以下简称“相关矿产”），为矿产供应链全过程涉及冲突敏感的采购活动以及供应商增强风险意识提供更全面的参考。本公司每年监测海内外受冲突影响和高风险地区及需管控矿产类型的变化，对供应链环节涉及到的矿产开展争议性识别，动态调整负责任矿产供应链尽职管理覆盖的矿产类型及具体的管控要求。

To further standardize the responsible management of the Company's minerals supply chain and to identify, prevent, mitigate and eliminate risks that may involve human rights violations, conflict escalation, breaches of business ethics or other adverse impacts, the Company hereby formulates and releases this supplementary policy. Anchored in the specific provisions for responsible minerals supply chain due diligence outlined in the Company's Human Rights Management Policy and the Sustainable Procurement Policy, the Policy expands the scope of minerals subject to such due diligence to include 3TG (tungsten, tin, tantalum, gold), cobalt and mica (referred to as "the relevant minerals"). It is intended to provide more comprehensive guidance for conflict-sensitive procurement activities throughout the entire minerals supply chain and to assist suppliers in enhancing their risk awareness. The Company monitors changes in conflict-affected and high-risk areas both domestically and internationally, as well as the types of minerals that require control, on an annual basis. The Company conducts controversy identification for minerals involved in the supply chain and dynamically adjusts the scope of minerals covered by responsible minerals supply chain due diligence and specific control requirements.

（一）负责任矿产供应链尽职管理目标 Responsible Minerals Supply Chain Due Diligence Targets

本公司订立如下负责任矿产管理目标：每年要求所供材料包含 3TG 矿产的直接供应商 100%签署《无冲突矿产声明》；自 2024 年起，每年要求光伏板块所供材料包含 3TG 矿产的直接供应商 100%回复 CMRT 调查表；自 2025 年起，每年要求光伏板块所供材料包含矿产钴和云母的直接供应商 100%回复 EMRT 调查表。

The Company has formulated the following responsible minerals management targets: 100% of direct suppliers whose supplied materials contain 3TG minerals have been required to sign the Conflict-Free Minerals Declaration every year; Starting from 2024, 100% of direct suppliers in the photovoltaic sector whose supplied materials contain 3TG minerals have been required to respond to the CMRT questionnaire every year; Starting from 2025, 100% of direct suppliers in the photovoltaic sector whose supplied materials contain cobalt and mica have been required to respond to the EMRT questionnaire every year.

（二）负责任矿产供应链尽职管理程序 Responsible Minerals Supply Chain Due Diligence Procedure

为达成以上目标，本公司参考《OECD 尽职调查指南》（第三版）附录一、《中国负责任矿产供应链尽责管理指南》（第二版）第五章要求，按照“建立和加强管理体系建设-确定和管理供应链中的风险-应对已识别的风险-开展尽职调查-发布和报告尽职调查结果”五个环节，推进矿产供应链负责任管理，确保供应链活动不涉及冲突风险。

To achieve the above targets, the Company has advanced the responsible management of the minerals supply chain in line with the requirements outlined in Appendix 1 of the *OECD Due Diligence Guideline (Third Edition)* and Chapter 5 of the *Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition)*. The Company advances the responsible management of the minerals supply chain through a five-stage process: "establishing and strengthening the construction of the management system, identifying and managing risks in the supply chain, mitigating identified risks, conducting due diligence, and publishing and reporting due diligence results". These efforts serve to ensure that all supply chain activities are free from conflict-related risks.

1. 建立和加强管理体系建设 Establish and Strengthen the Construction of the Management System

本公司董事会是矿产供应链负责任管理工作的最高层级，由战略与可持续发展委员会代表董事会开展矿产供应链负责任管理议题的日常管理与监督。在董事会授权的战略与可持续发展委员会的监督与指导下，本公司风险合规与 ESG 管理委员会统筹管理矿产供应链负责任管理议题。风险合规与 ESG 管理委员会授权其秘书处，协同风险合规与 ESG 管理工作组中的供应链管理部，以及其他关联部门，共同推进矿产供应链负责任管理实践。

The Company's Board of Directors is the highest authority overseeing the responsible management of the minerals supply chain. The Strategy and Sustainability Committee, on behalf of the Board of Directors, is responsible for the daily management and supervision of such efforts. Under the supervision and guidance of the Strategy and Sustainability Committee (authorized by the Board of Directors), the Company's Risk Compliance and ESG Management Committee oversees the implementation of the responsible management of the minerals supply chain. The Risk Compliance and ESG Management Committee further authorizes its Secretariat to cooperate with the Supply Chain Management Department (under the Risk Compliance and ESG Management Working Group) and other relevant departments to jointly advance the practice of responsible minerals supply chain management.

本公司风险合规与 ESG 管理委员会秘书处负责矿产供应链负责任管理方针和规范的总体制定、管理与实施。供应链管理部负责矿产供应链负责任管理方针和规范的落地推进。其他关联部门由具有矿产供应链负责任管理能力和经验的成员组成，负责与相关方协同执行矿产供应链负责任管理流程，包括实施供应链尽职调查和风险识别与缓释等。每年 ESG 报告审核时，董事会及战略与可持续发展委员会将审阅年度矿产供应链负责任管理进展。

The Secretariat of the Company's Risk Compliance and ESG Management Committee is responsible for the overall formulation, management and implementation of policies and regulations for the responsible management of the minerals supply chain. The Supply Chain Management Department is responsible

for promoting the implementation of policies and regulations for the responsible management of the minerals supply chain. Other related departments, composed of members with capabilities and experience in the responsible management of the minerals supply chain, are responsible for collaborating with relevant parties to implement the responsible management processes of the minerals supply chain, including conducting supply chain due diligence and risk identification and mitigation. During the annual ESG reports review, the Board of Directors and the Strategy and Sustainability Committee review the annual progress in the responsible management of the minerals supply chain.

本公司建立了基于风险视角的矿产供应链负责任管理体系，定期监测、辨识与相关矿产关联的采购环节，持续追踪供应链中涉及到的相关矿产的属性与原产地。在准入阶段，本公司要求所有直接供应商签订《晶科能源供应链合作伙伴行为准则》，这其中即包含了对矿产供应链负责任管理方面的要求，以确保矿产供应链负责任管理要求有效传达。在日常管理阶段，本公司依托外部专业工具面向光伏板块所供材料包含相关矿产的直接供应商开展矿产供应链负责任管理尽职调查，同时要求所有所供材料包含 3TG 矿产的直接供应商出具《无冲突矿产声明》。本公司矿产供应链负责任管理尽职调查及《无冲突矿产声明》签署工作每年开展 1 次。

The Company has established a risk-based responsible management system for the minerals supply chain. The Company regularly monitors and identifies the procurement processes associated with the relevant minerals, and continuously tracks the attributes and origins of the relevant minerals involved in the supply chain. In the access stage, the Company requires all direct suppliers to sign the *Jinko Solar Supply Chain Partner Code of Conduct*, which includes requirements for the responsible management of the minerals supply chain to ensure the effective communication of such requirements. In the daily management stage, relying on external professional tools, the Company conducts responsible minerals supply chain due diligence for direct suppliers whose materials supplied to the photovoltaic sector contain the relevant minerals.

Meanwhile, all direct suppliers whose supplied materials contain 3TG minerals are required to issue a "Conflict-Free Minerals Declaration". The Company's responsible minerals supply chain due diligence and the signing of the "Conflict-Free Minerals Declaration" are conducted once a year.

在供应链可追溯层面，本公司已组建了专注于供应商端的供应链 ESG 管理团队，深度协同供应商推进本公司原材料追溯管理体系建设，覆盖供应链矿产材料来源追溯等核心环节，为追溯管理提供专业支持与高效协调。同时，本公司搭建了功能完善的供应商线上管理平台，通过系统化方式实现供应商数据的全生命周期管理，为原材料追溯管理提供稳定、高效的数字化支撑，推动追溯管理流程的标准化与透明化。

In terms of supply chain traceability, the Company has established a supply chain ESG management team focused on the supplier side, which deeply collaborates with suppliers to advance the construction of our raw material traceability management system. This system covers core links such as the traceability of mineral material sources in the supply chain, providing professional support and efficient coordination for traceability management. Meanwhile, the Company has built a fully functional online supplier management platform. Through systematic methods, it realizes the full-lifecycle management of supplier data, offers stable and efficient digital support for raw material traceability management, and promotes the standardization and transparency of traceability management processes.

针对核心原材料，本公司持续推进智能化技术升级与业务流程优化，从追溯管理流程的效率、精准度等多维度发力，全面提升原材料追溯管理综合效能。目前本公司核心原材料追溯管理能力已实现显著跃升，单月最高审核能力突破吉瓦级，充分彰显了在供应链可持续管理与追溯管理体系建设上的硬实力。

For core raw materials, the Company continuously advances intelligent technology upgrading and business process optimization. By making efforts

from multiple dimensions such as the efficiency and accuracy of traceability management processes, the Company comprehensively enhances the overall effectiveness of core raw material traceability management. At present, the capability of the Company's core raw material traceability management has achieved a significant leap, with the maximum monthly audit capacity exceeding the gigawatt-level. This fully demonstrates the Company's strong capabilities in supply chain sustainable management and the construction of traceability management system.

2. 确定和管理供应链中的风险 Identify and Manage Risks in the Supply Chain

本公司不直接从冶炼厂或精炼厂购买或采购原材料或精炼矿产，且《OECD 尽职调查指南》（第三版）中也认识到下游公司很难通过冶炼厂或精炼厂识别上游参与，这意味着想要确保供应链不涉及冲突风险将面临较大的挑战。本公司致力于使用标准的方式确定供应链中涉及到的冶炼厂或精炼厂，以此确定相关矿产是否来自受冲突影响和高风险地区。

The Company does not purchase or source raw materials or refined minerals directly from smelters or refineries. Furthermore, the *OECD Due Diligence Guideline (Third Edition)* acknowledges that it is challenging for downstream companies to identify upstream participants through smelters or refineries, which implies that ensuring the supply chain is free from conflict-related risks will pose substantial challenges. The Company commits to adopting standardized approaches to identify the smelters or refineries involved in the supply chain, thereby determining whether the relevant minerals originate from conflict-affected and high-risk areas.

为应对上述挑战与风险，本公司采用“二方+三方”审计结合的方式，对光伏板块所供材料包含相关矿产的直接供应商开展矿产供应链负责任管理尽职调查，要求涉及的直接供应商提供尽职调查结果，以帮助本公司获得和追溯矿产供应链采购信息。同时，本公司要求所有所供材料包含 3TG 矿产的直接供应商出具《无

冲突矿产声明》，并在《无冲突矿产声明》中列明矿产类型及来源地。

To address the aforementioned challenges and risks, the Company adopts a combination of "second-party + third-party" audits to conduct responsible minerals supply chain due diligence for direct suppliers whose materials supplied to the photovoltaic sector contain the relevant minerals. The Company requires the involved direct suppliers to provide the findings of their due diligence, to help the Company obtain and trace the procurement information of the minerals supply chain. Meanwhile, the Company requires all direct suppliers whose supplied materials contain 3TG minerals to issue a "Conflict-Free Minerals Declaration", in which the mineral types and their origins are specified.

本公司风险合规与 ESG 管理委员会秘书处负责汇总矿产供应链涉及到的冶炼厂或精炼厂、矿产类型及来源地等相关信息，通过数据库对比等方式，确认矿产供应链是否涉及冲突风险。本公司重点关注未参与 RMAP 认证的冶炼厂或精炼厂，以及矿产供应链负责任管理尽职调查证实存在冲突风险的供应商。

The Secretariat of the Company's Risk Compliance and ESG Management Committee is responsible for compiling relevant information such as smelters or refineries involved in the minerals supply chain, mineral types and their origins. The Company confirms whether the minerals supply chain involves conflict risks through methods such as database comparison. The Company focuses on smelters or refineries that have not participated in Responsible Minerals Assurance Process Certification (referred to as "the RMAP Certification"), as well as suppliers for whom conflict risks have been confirmed through responsible minerals supply chain due diligence.

3. 应对已识别的风险 Mitigate Identified Risks

本公司根据矿产供应链负责任管理尽职调查结果实施应对策略。针对未参与 RMAP 认证的冶炼厂或精炼厂，以及矿产供应链负责任管理尽职调查证实存在

风险的供应商，本公司愿意为其提供资讯和资源，并提供针对性指导。本公司也将严肃处置经沟通改善后仍无法满足合规要求的供应商，相关供应商的无作为将触发业务层面的退出机制。此外，本公司每年组织矿产供应链负责任管理相关知识培训，向内部采购员及供应商宣贯矿产供应链负责任管理要求，进而帮助供应商提升相关管理能力。

The Company formulates response strategies based on the findings of responsible minerals supply chain due diligence. For smelters or refineries that have not participated in the RMAP Certification, as well as suppliers identified with risks through such due diligence, the Company is willing to provide them with information, resources and targeted guidance. The Company will also take serious actions against suppliers that remain non-compliant despite communication and improvement efforts; their inaction will trigger an exit mechanism at the business level. Additionally, the Company organizes annual training sessions on knowledge related to responsible minerals supply chain management, to disseminate the relevant requirements to internal purchasers and suppliers, thereby helping suppliers enhance their management capabilities in this regard.

本公司亦积极评估相关矿产在产品中使用的必要性，鼓励所供材料包含相关矿产的供应商积极寻找替代矿产来源，或从非传统来源（如回收材料、工业废料等）中获取矿产，以持续降低供应链潜在合规风险。

The Company also actively assesses the necessity of using the relevant minerals in its products, and encourages suppliers whose supplied materials contain such minerals to actively seek alternative mineral sources or obtain minerals from non-traditional sources (such as recycled materials, industrial waste, etc.), to continuously reduce potential compliance risks in the supply chain.

4. 开展尽职调查 Conduct Due Diligence

作为矿产供应链下游企业，本公司认同对供应链开展矿产供应链负责任管理尽

职调查的重要意义，同时也不得不承认针对矿产供应链负责任管理开展独立第三方审计的复杂性。本公司信任和依赖外部专业工具和权威数据，要求光伏板块所有所供材料包含相关矿产的直接供应商配合本公司开展矿产供应链负责任管理尽职调查；在供应链外部第三方 ESG 审计专项中加入矿产供应链负责任管理模块内容，委托专业第三方进一步确认尽职调查结果的准确性。同时，本公司鼓励所有所供材料包含相关矿产的直接供应商建立矿产供应链负责任管理制度与程序，自主开展矿产供应链负责任管理尽职调查，积极评估供应链涉及到的冶炼厂或精炼厂是否符合无冲突风险要求。通过与光伏板块供应商的协作，本公司间接参与对冶炼厂或精炼厂的合规审计。

As a downstream enterprise in the minerals supply chain, the Company recognizes the critical significance of conducting responsible minerals supply chain due diligence. Meanwhile, the Company must acknowledge the complexity inherent in carrying out independent third-party audits concerning the responsible management of the minerals supply chain. The Company places trust in and relies on external professional tools and authoritative data, and requires all direct suppliers within the photovoltaic sector whose materials contain the relevant minerals to cooperate with the Company in conducting responsible minerals supply chain due diligence. The Company has integrated a dedicated section on the responsible management of the minerals supply chain into its third-party supply chain ESG audit program, and engaged professional third parties to further validate the accuracy of due diligence findings. Furthermore, the Company encourages all direct suppliers providing materials containing the relevant minerals to establish systems and procedures for the responsible management of the minerals supply chain, conducts independently due diligence in this regard, and actively evaluates whether the smelters or refineries involved in their supply chain meet the conflict-free risk requirements. Through collaboration with suppliers in the photovoltaic sector, the Company indirectly participates in the compliance audits of these smelters or refineries.

5. 发布和报告尽职调查结果 Publish and Report Due Diligence Results

本公司已建立了矿产供应链负责任管理信息披露机制，每年对供应链负责任管理尽职调查进展与成果进行总结和检讨，希望通过详尽的信息披露加强与利益相关方的沟通交流，同时借此进一步提升相关管理能力。本公司在每年 ESG 报告中公开披露矿产供应链负责任管理进展，以便相关方获悉本公司相关管理现状。

The Company has established an information disclosure mechanism for the responsible management of the minerals supply chain. Each year, the Company summarizes and reviews the progress and findings of responsible supply chain due diligence. The Company aims to enhance communication and engagement with stakeholders through detailed information disclosure, while also leveraging this process to further improve relevant management capabilities. The Company publicly discloses the progress of the responsible management of the minerals supply chain in its annual ESG reports, enabling relevant parties to stay informed about the current status of the Company's relevant management efforts.

（三）负责任矿产供应链尽职管理承诺 Responsible Minerals Supply Chain Due Diligence Commitments

本公司对各类采购、使用与侵犯人权、助长冲突、违反商业道德或造成其他不利影响相关的矿产的行为持“零容忍”态度，承诺不采购、不使用与直接或间接资助受冲突影响和高风险地区武装团体相关的矿产，不采购、不使用与侵犯人权、助长冲突、违反商业道德或造成其他不利影响相关的矿产，不直接或间接参与任何会为受冲突影响和高风险地区冲突行动提供资助的活动。本公司承诺坚决不采购、使用来自受冲突影响地区的矿产，不与涉及受冲突影响地区采购活动或与之相关联的供应商开展合作。本公司承诺遵守联合国相关制裁决议，遵守适用执行此类决议的国内法律。

The Company maintains a "zero tolerance" stance towards all practices involving the procurement or use of minerals linked to human rights violations, conflict escalation,

breaches of business ethics or other adverse impacts. The Company undertakes not to procure or use minerals that directly or indirectly fund armed groups in conflict-affected and high-risk areas, nor those associated with human rights violations, conflict escalation, breaches of business ethics or other adverse impacts. The Company neither directly nor indirectly engages in any activities that finance conflict-related operations in such areas. The Company commits to resolutely refraining from procuring or using minerals originating from conflict-affected areas, and will not cooperate with suppliers that are involved in or associated with procurement activities related to such areas. The Company commits to complying with relevant United Nations Sanction Resolutions or, where applicable, the domestic laws implementing such resolutions.

本公司参考《OECD 尽职调查指南》（第三版）附录二及《中国负责任矿产供应链尽责管理指南》（第二版）附录一要求，承诺采纳并广泛推广如下矿产供应链负责任管理政策，并将该政策要求通过《晶科能源供应链合作伙伴行为准则》纳入与供应商签订的合同和/或协议之中，要求所有直接供应商积极遵循，并与本公司合作实施矿产供应链负责任管理尽职调查。

The Company, with reference to the requirements outlined in Appendix II of the *OECD Due Diligence Guideline (Third Edition)* and Appendix I of the *Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition)*, commits to adopting and widely promoting the following policy for responsible management of the minerals supply chain. This policy shall be incorporated into contracts and/or agreements with suppliers via the *Jinko Solar Supply Chain Partner Code of Conduct*, requiring all direct suppliers to actively comply therewith and collaborate with the Company in conducting due diligence for responsible management of the minerals supply chain.

1. 与矿产开采、运输，或贸易有关的严重侵权行为 Regarding Serious Abuses Associated with the Extraction, Transport or Trade of Minerals

- (1) 在高风险地区开展采购或经营活动时，本公司既不会容忍也不会以任何方式获利于、帮助、协助或便利任何一方实施以下行为：

When engaging in procurement or production activities in high-risk areas, the Company will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

- a. 最恶劣形式的童工（危害性工作是最恶劣形式童工中的一种）；

The worst forms of child labor (hazardous work is one of the worst forms of child labor);

- b. 任何形式的酷刑、残忍、不人道和有辱人格的待遇；

Any forms of torture, cruel, inhuman and degrading treatment;

- c. 任何形式的强迫或强制劳动，即以惩罚相威胁，在他人非自愿的情况下迫使从事一切劳动或服务；

Any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;

- d. 其他严重侵犯和践踏人权的行爲，如普遍的性暴力行为；

Other gross human rights violations and abuses such as widespread sexual violence;

- e. 战争罪或其他严重违反国际人道主义法的行爲，如反人类罪、种族灭绝罪；

War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;

- f. 其他不符合“无冲突规范”的地區的矿产产品，如联合国安全理事会认定的在刚果民主共和国采矿造成侵犯人权、环境恶化的矿产原料，或卢旺达、乌干达等产自刚果矿脉之矿产。

Mineral products from other areas that do not meet the "conflict-free criteria", such as raw minerals from mining in the Democratic Republic of the Congo that have been identified by the UN Security Council as causing human rights violations and environmental degradation, or minerals from Congolese veins in Rwanda, Uganda, etc.

2. 对严重侵权行为的风险管理 Regarding Risk Management of Serious Abuses

- (2) 如果本公司有合理理由认为该风险存在，即上游供应商正从实施第（1）段所规定的严重侵权行为的任何一方进行采购或与该方有关联，本公司将立即中止或中断与该上游供应商的合作。

The Company will immediately suspend or discontinue engagement with the upstream suppliers if it identifies a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph (1).

3. 关于直接或间接支持非国家武装团体 Regarding Direct or Indirect Support to Non-state Armed Groups

- (3) 本公司不会容忍任何通过矿产资源开采、运输、贸易、处理或出口为非国家武装团体提供直接或间接的支持。通过矿产资源开采、运输、贸易、处理或出口为非国家武装团体提供“直接或间接的支持”包括且不限于从非国家武装团体或其关联方购买矿产，向其支付费用，或以其他方式为其提供后勤支援或设备等。这些武装团体或关联方包括：

The Company will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of mineral resources. "Direct or Indirect Support" to non-state armed groups through the extraction, transport, trade, handling or export of mineral resources includes, but is not limited to, procuring minerals from, making payments to or otherwise

providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- a. 非法控制矿区，或以其他方式对通往矿区沿线、矿产资源贸易地，以及供应链的上游参与方进行控制；并/或

Illegally control mine sites or otherwise control over the transportation routes to mine sites, points where minerals are traded and upstream participants in the supply chain; and/or

- b. 在矿区入口、通往矿区沿线，或矿产资源贸易地非法征税或者勒索钱财或自然资源；并/或

Illegally tax or extort money or mineral resources at points of access to mine sites, along transportation routes to mine sites or at points where minerals are traded; and/or

- c. 对中间商、出口企业，或国际贸易商非法征税或勒索。

Illegally tax or extort intermediaries, export companies or international traders.

4. 对向非国家武装团体提供直接或间接支持的风险管理 Regarding Risk Management of Direct or Indirect Support to Non-state Armed Groups

- (4) 如果本公司有理由认为，上游供应商从向非国家武装团体（见第（3）段中定义）提供直接或间接支持的任何一方进行采购或与该方有关联，本公司将立即中止或中断与该上游供应商的合作。

The Company will immediately suspend or discontinue engagement with the upstream suppliers if it identifies a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph (3).

5. 关于公共或私人安全武装 Regarding Public or Private Security Forces

- (5) 本公司同意根据第（10）段之规定，杜绝向非法控制矿区、通往矿区沿线以及供应链上游参与方，在矿区入口、通往矿区沿线或矿产资源贸易地非法征税或索要钱财或矿产，或者向中间商、出口企业或国际贸易者非法征税或进行勒索的公共或私人安全武装提供直接或间接支持。

The Company agrees to refrain from, based on paragraph (10), directly or indirectly supporting public or private security forces who illegally control mine sites, transportation routes to mine sites and upstream participants in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes to mine sites or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

- (6) 本公司认可，矿区及/或其周边地区以及/或通往矿区沿线的公共或私人安全武装的作用仅是维护法治，包括保障人权、保护矿工、设备和设施安全、保护矿区或通往矿区沿线以使合法的开采和贸易不受干扰。

The Company recognizes that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes to mine sites should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine sites or transportation routes to mine sites from interference with legitimate extraction and trade.

- (7) 在本公司或本公司供应链上的任何企业与公共或私人安全武装签订了合约的情况下，本公司承诺或者将规定，在与这类安全武装进行合作的过程中将遵守《安全与人权自愿原则》的规定。尤其是，本公司将会支持或采取措施运用筛查政策，确保已知的实施过严重侵犯人权行为的个人或安全武装单位不被录用。

Where the Company or any enterprise in the Company's supply chain contract public or private security forces, the Company commits to, or the Company will

require that such security forces will be engaged based on the *Voluntary Principles on Security and Human Rights*. In particular, the Company will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

- (8) 本公司将支持或采取措施与中央和地方政府、国际组织和民间社会组织开展合作，共同为如何提高公共安全武装安保费用的透明度、相称性和问责性找到可行的解决方案。

The Company will support efforts, or take steps, to engage with central and local authorities, international organizations and civil society organizations to contribute to workable solutions for improving transparency, proportionality and accountability in security payments to public security forces.

- (9) 本公司将支持或采取措施，与当地政府、国际组织和民间社会组织开展互动，避免或最大限度地降低公共或私人安全武装驻扎在矿区给弱势群体带来的负面影响，尤其是对小作坊矿工的负面影响。

The Company will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

6. 对公共或私人安全武装的风险管理 Regarding Risk Management of Public or Private Security Forces

- (10) 如果本公司发现在一定程度上存在此类风险，将根据企业在供应链上所处的具体位置，立即制定、采用和实施上游供应商及其他利益相关方风险管理计划，从而使第（5）段中所述的为公共或私人安全武装提供直接或间接支持

的风险得到遏制或降低。如果风险管理计划实施六个月未奏效，本公司将立即中止或中断与该上游供应商的合作。本公司发现在一定程度上有可能存在违背第（8）段和第（9）段内容的行为的情况下，将采取同样的应对措施。

Based on the specific position of the enterprise in the supply chain, the Company will immediately devise, adopt and implement a risk management plan with the upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as defined in paragraph (5), where the Company identifies that such a reasonable risk exists. The Company will suspend or discontinue engagement with the upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where the Company identifies a reasonable risk of activities inconsistent with paragraphs (8) and (9), the Company will respond in the same vein.

7. 关于行贿受贿及矿产原产地的欺诈性失实陈述 Regarding Bribery and Fraudulent Misrepresentation of the Origin of Minerals

- (11) 本公司不会直接或间接地提出、承诺、给予或索要任何贿赂，并且抵制索贿，不会为了掩盖或伪造矿产资源原产地，虚报矿产资源开采、运输、贸易、处理、出口等活动应向政府缴纳的税收、费用和特许开采费而行贿或不遵守相关国际反腐败标准和惯例。

The Company will not directly or indirectly offer, promise, give or demand any bribes, and will resist the solicitation of bribes. The Company will not engage in bribery or fail to comply with relevant international anti-corruption standards and practices for the purpose of concealing or disguising the origin of minerals, or misrepresenting taxes, fees and royalties paid to governments for activities such as mineral resources extraction, transport, trade, handling and export.

8. 关于洗钱 Regarding Money Laundering

- (12)如果本公司有理由认为，存在因开采、运输、贸易、处理、出口等活动在矿区入口、通往矿区沿线，或上游供应商矿产贸易地进行非法征税或勒索而得的矿产资源所引起或与之相关的洗钱风险，本公司将支持或采取措施，为有效消除洗钱行为做出贡献。

The Company will support efforts, or take steps, to contribute to the effective elimination of money laundering where the Company identifies a reasonable risk of money-laundering resulting from, or connected to, the extraction, transport, trade, handling or export of mineral resources derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes to mine sites or at points where minerals are traded by the upstream suppliers.

9. 关于向政府支付的税收、费用及特许费 Regarding the Payment of Taxes, Fees and Royalties to Governments

- (13)本公司将确保向政府支付所有与高风险地区矿石开采、运输、贸易、处理、出口相关的合法税收、费用和特许费，并且承诺根据企业在供应链上所处位置依照《采掘行业透明度行动计划》（EITI）中的各项原则对此类支付进行披露。

The Company will ensure that all taxes, fees, and royalties related to mineral resources extraction, transport, trade, handling and export from high-risk areas are paid to governments and, based on the enterprise's position in the supply chain, the Company commits to disclosing such payments based on the principles set forth under the Extractive Industry Transparency Initiative (EITI).

10. 对行贿受贿及矿产原产地的欺诈性失实陈述、洗钱及向政府支付的税收、费用、特许费的风险管理 Regarding Risk Management of Bribery and

Fraudulent Misrepresentation of the Origin of Minerals, Money-laundering and Payment of Taxes, Fees and Royalties to Governments

- (14) 根据企业在供应链上所处的具体位置，本公司承诺与供应商、中央或地方政府机关、国际组织、民间社会以及受影响的第三方酌情进行合作，本着在合理的时间跨度内采取显著措施防范或降低有负面影响的风险之目的，对绩效进行改善或跟踪。如果风险降低措施实施六个月未奏效，本公司将立即中止或中断与该上游供应商的合作。

Based on the specific position of the enterprises in the supply chain, the Company commits to engaging with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve or track performance with a view to preventing or mitigating risks of adverse impacts through significant steps taken in reasonable timescales. The Company will suspend or discontinue engagement with the upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.

11. 关于职业健康与安全 Regarding Occupational Health and Safety

- (15) 在高风险地区开展采购或经营活动时，本公司不会获利于、协助、便利于任何为其直接和/或间接雇员和/或在其生产现场的任何人员提供威胁到生命的职业环境的一方，或从有该情况的任何一方进行采购或与该方存在关联。

When engaging in procurement or production activities in high-risk areas, the Company will not profit from, assist with, or facilitate or source from, or be linked to, any party providing a life-threatening occupational environment to direct and/or indirect employees and/or any personnel present on the party's operations.

12. 对职业健康与安全的风险管理 Regarding Risk Management of Occupational Health and Safety

- (16) 如果本公司有合理理由认为上游供应商提供如第（15）段内容中所定义的威胁到生命的职业环境，或从有该情况的任何一方进行采购或与该方存在关联，本公司将立即中止或中断与该上游供应商的合作。

The Company will immediately suspend or discontinue engagement with the upstream suppliers where the Company identifies a reasonable risk that they are sourcing from, or linked to, any party providing a life-threatening occupational environment as defined in paragraph (15).

13. 关于童工 Regarding Child Labor

- (17) 在高风险地区开展采购或经营活动时，本公司将不会雇佣低于东道国法律或法规规定的最低工作年龄的儿童，不会获利于、协助或为低于东道国法律或法规规定的最低工作年龄的儿童就业提供便利，不会从有该情况的任何一方进行采购或与该方存在关联。如果东道国没有相关的法律或法规规定，最低工作年龄为 16 周岁。

When engaging in procurement or production activities in high-risk areas, the Company will neither employ child labor below the minimum working age specified by the applicable laws or regulations of the host country, nor profit from, assist with, or facilitate the aforesaid employment. Additionally, the Company will refrain from purchasing from or in any manner engaging with any party that employs child labor as described above. If there are no relevant host country laws or regulations, the minimum age shall be 16 years.

14. 对童工的风险管理 Regarding Risk Management of Child Labor

- (18) 如果本公司有合理理由认为该风险存在，即上游供应商存在该情况，或者从存在上述第（17）段所规定的情况的任何一方进行采购或与该方存在关联，本公司将立即中止或中断与该上游供应商的合作。

The Company will immediately suspend or discontinue engagement with the upstream suppliers if the Company identifies a reasonable risk that they are employing child labor below the minimum working age, sourcing from, or linked to, any party employing child labor as defined in paragraph (17).

15. 关于土地权利、排放和小作坊 Regarding Land Rights, Emissions and Artisanal Operators

- (19) 在高风险地区进行采购活动时，本公司不会获利于、协助、便利于任何给周围土壤、空气和水资源的状况造成重大不利影响，任何严重违反当地相关法律法规的一方或从有该情况的任何一方进行采购或与该方存在关联。本公司将支持上游供应商采取措施定期评估、降低采矿活动对土壤、空气、水资源造成的不利影响。

When engaging in procurement activities in high-risk areas, the Company will not profit from, assist with, or facilitate any party that causes significant adverse impacts regarding ambient soil, air and water conditions, or source from or be linked to any party with gross violation of local laws and regulations. The Company will support the upstream suppliers in taking actions to regularly evaluate to mitigate the adverse impacts of mining activities regarding ambient soil, air and water.

- (20) 本公司不参与、不容忍，也不受益于在未获得当地人和土著人自由、事先、知情同意或在非法获得法定所有权、租赁权、特许权或许可证，或违反国内法的土地上开采矿产资源。

The Company does not participate in, tolerate, or profit from the exploitation of mineral resources from lands where the free, prior and informed consent of local

communities and indigenous peoples has not been obtained, a legal title, lease, concession, or license has been obtained illegally, or national laws have been violated.

- (21) 本公司不参与、不容忍，也不受益于从不尊重、不保护当地人和土著人文化和遗产，或损害当地人和土著人传统文化和遗产，以及在法定保护区的采矿作业中采购矿产资源或与该方有关联。

The Company does not participate in, tolerate, or profit from sourcing mineral resources from, or being linked to, mining activities that fail to respect and protect the culture and heritage of local communities and indigenous peoples, that damage their traditional culture and heritage, or that take place in legally protected areas.

- (22) 本公司特别关注与小作坊或小规模采矿商相关的强迫劳动、童工、不安全工作条件、不受控危险化学品使用和其他重大环境影响的风险，鼓励上游供应商积极寻求与开采区的小作坊或小规模采矿商建立生产关系，同时推动小作坊或小规模采矿商生产与工作环境改善。

The Company is particularly concerned about forced labor, child labor, unsafe working conditions, uncontrolled use of hazardous chemicals and other significant environmental impact risks related to artisanal or small-scale miners. The Company encourages the upstream suppliers to actively seek to establish production relationships with artisanal or small-scale miners in mining areas, while promoting improvements in their production and working environments.

16. 对土地权利、排放和小作坊的风险管理 Regarding Risk Management of Land Rights, Emissions and Artisanal Operators

- (23) 如果本公司有合理理由认为存在此类风险，本公司将根据企业在供应链上所处的具体位置，立即制定、采用和实施上游供应商及其他利益相关方风险管

理计划，从而防范或降低侵害上述第（19-22）段所规定的具体风险。如果风险管理计划实施未奏效，本公司将立即中止或中断与该上游供应商的合作。

Based on the specific position of the enterprise in the supply chain, the Company will immediately devise, adopt and implement a risk management plan with the upstream suppliers and other stakeholders to prevent or mitigate those risks as defined in paragraphs (19-22), where the Company identifies that such a reasonable risk exists. The Company will suspend or discontinue engagement with the upstream suppliers after failed attempts at mitigation from the adoption of the risk management plan.

五、申诉和上报机制 Grievance and Escalation Mechanisms

本公司提供畅通的沟通和申诉机制，以保障本政策的有效实施。对于违反本政策或任何适用法律法规的一切实情或嫌疑，本公司所有董事、高级管理层及员工，以及合作伙伴均有义务上报。若希望举报，可将有关违规实情或嫌疑情况，或其他投诉，或涉及的问题，上报至 jubao@jinkosolar.com。本公司承诺严格保密举报人身份信息及举报内容。

The Company provides a smooth communication and appeal mechanism to ensure the effective implementation of this policy. All directors, senior management and employees, as well as partners, are obliged to report any facts or suspicions of violations of this Policy or any applicable laws and regulations. If you wish to report, you may report the facts or suspicions of the violation, or other complaints or issues involved, to jubao@jinkosolar.com. The Company promises to strictly keep the identity information and content of the report confidential.