晶科能源
www.jinkosolar.com
中国上海市闵行区申长路1466弄1号
201106
No. 1, Lane 1466,
Shenchang Road, Minhang District,
Shanghai, China
电话:(86)21-5180 8777
传真:(86)21-5180 8600
Tel:(86)21-5180 8777
Fax:(86)21-5180 8600

Jinko Solar Responsible Mineral Supply Chain Due Diligence Policy

Version: 2026V1.1

1. Overview

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

2. Scope of Application

This Policy applies to all business and operational activities of the Company and its branches and subsidiaries. The Company encourages all directors, senior management and employees, as well as value chain partners (including service providers, suppliers and contractors), to follow this Policy and work together to advance the responsible management of mineral supply chains. This Policy also applies to other key business partners, including distributors, consultants and outsourcing partners. Its provisions also apply to the Company's mergers and acquisitions and related due diligence activities worldwide. The Company is further committed to exercising its influence over non-controlling joint ventures and urging them to act in accordance with this Policy.

3. Publication Statement

The Board of Directors serves as the Company's highest decision-making and oversight body for the responsible management of mineral supply chains. The publication of the relevant policies and commitments has been endorsed by the Board of Directors and senior management. This Policy is generally reviewed and, where appropriate, updated annually to ensure that it remains current and applicable. This Policy is issued in Chinese and English. In the event of any inconsistency between the two versions, the Chinese version shall prevail.It is published in the ESG section of Jinko Solar's website and communicated to key stakeholders through email, meetings, online notifications and other channels.

4. Commitments and Targets

The Company is firmly committed to neither procuring nor using minerals originating from conflict-affected areas and to refraining from business relationships with suppliers that engage in, or are associated with, sourcing activities in conflict-affected areas. The Company believes that supply chain partners should jointly uphold the principles of sustainable development and work together to advance the responsible management of mineral supply chains.

To further standardize the Company's responsible mineral supply chain management and to identify, prevent, mitigate and eliminate risks that may infringe human rights, contribute to conflict, breach business ethics or cause other adverse impacts, the Company supplements the specific responsible mineral supply chain due diligence provisions under its Human Rights Management Policy and Sustainable Procurement Policy by issuing this Policy. The minerals covered by the Company's due diligence have been expanded to include 3TG (tungsten, tin, tantalum and gold), cobalt, mica, silicon and quartz (collectively, the "Relevant Minerals"). This provides more comprehensive guidance for conflict-sensitive sourcing activities throughout the mineral supply chain and helps suppliers strengthen risk awareness. Each year, the Company monitors changes in conflict-affected and high-risk areas in China and abroad and in the types of minerals requiring control, screens minerals involved in its supply chain for potential conflict-related risks, and dynamically adjusts the minerals covered by responsible mineral supply chain due diligence and the applicable control requirements.

The Company has established the following responsible mineral management targets. In the short term, the Company will require 100% of suppliers to its photovoltaic business segment whose supplied materials contain 3TG, cobalt, mica, silicon or quartz to respond to the OECD questionnaire each year. It will continue to design and provide supplier training programs to strengthen suppliers' conflict minerals compliance management capabilities. In the medium to long term, the Company will expand its conflict minerals surveys from 3TG, cobalt, mica, silicon and quartz to additional mineral categories and collaborate with diverse stakeholders to further enhance its conflict minerals due diligence capabilities.

5. Actions and Practices

5.1 Responsible Mineral Supply Chain Due Diligence Process

To achieve the above targets, the Company advances the responsible management of mineral supply chains in accordance with the Five-step Framework for Risk-based Due Diligence in the Mineral Supply Chain set out in Annex I to the OECD Due Diligence Guidance (Third Edition) and the due diligence process requirements in Chapter V of the Chinese Due Diligence Guidelines for Mineral Supply Chains (Second Edition). The five stages are establishing and strengthening management systems, identifying and managing risks in the supply chain, responding to identified risks, conducting due diligence, and publishing and reporting due diligence results, thereby helping to ensure that supply chain activities are not exposed to conflict-related risks.

5.1.1 Establishing and Strengthening Management Systems

The Board of Directors is the Company's highest governing body for the responsible management of mineral supply chains. The Strategy and Sustainable Development Committee carries out day-to-day management and oversight of responsible mineral supply chain matters on behalf of the Board. Under the oversight and guidance of the Strategy and Sustainable Development Committee as authorized by the Board, the Risk Compliance and ESG Management Committee coordinates the management of responsible mineral supply chain matters. The Risk Compliance and ESG Management Committee authorizes its Secretariat to work with the Supply Chain Management Department, Traceability Management Department and other relevant departments represented in the Risk Compliance and ESG Management Working Group to jointly advance responsible mineral supply chain practices.

The Secretariat of the Risk Compliance and ESG Management Committee is responsible for the overall development, management and implementation of responsible mineral supply chain policies and standards. The Supply Chain Management Department is responsible for implementing these policies and standards. Other relevant departments comprise personnel with responsible mineral supply chain expertise and experience and work with relevant parties to carry out the due diligence process, including supply chain due diligence, risk identification and risk mitigation. During the annual review of the ESG report, the Board of Directors and the Strategy and Sustainable Development Committee review progress in responsible mineral supply chain management for the year.

The Company has established a risk-based responsible mineral supply chain management system. It regularly monitors and identifies sourcing activities involving Relevant Minerals and continuously tracks the types, attributes and countries of origin of Relevant Minerals in its supply chain. At the onboarding stage, the Company requires all suppliers to sign a letter of undertaking covering the provisions of the Jinko Solar Supply Chain Partner Code of Conduct, including conflict minerals compliance management requirements, to ensure that such requirements are effectively communicated. As part of ongoing management, the Company uses external professional tools to conduct responsible mineral supply chain due diligence on direct suppliers to the photovoltaic business segment whose supplied materials contain Relevant Minerals. It also requires all direct suppliers whose supplied materials contain 3TG, cobalt or mica to issue a Conflict-Free Minerals Declaration. The responsible mineral supply chain due diligence exercise and the signing of Conflict-Free Minerals Declarations are conducted annually.

With respect to supply chain traceability, the Company has established a Traceability Management Department within its product quality management system. The department works closely with suppliers to advance traceability audits and supply chain audits, covering key areas such as tracing the sources of mineral materials in the supply chain, and provides professional support and efficient coordination for traceability management. The Company has achieved 100% traceability of 3TG minerals to smelters or refiners certified and is committed to maintaining 100% traceability coverage. The Company has also developed a comprehensive online supplier management platform that systematically manages supplier data throughout its life cycle, providing stable and efficient digital support for raw material traceability and promoting standardized and transparent traceability processes.

5.1.2 Identifying and Managing Risks in the Supply Chain

The Company does not purchase or source raw materials or refined minerals directly from smelters or refiners. The OECD Due Diligence Guidance and the Chinese Due Diligence Guidelines for Mineral Supply Chains also recognize that it is difficult for downstream companies to identify upstream actors through smelters or refiners, presenting significant challenges in ensuring that supply chains are free from conflict-related risks. The Company is committed to identifying the smelters or refiners in its supply chain using standardized methods in order to determine whether Relevant Minerals originate from conflict-affected and high-risk areas.

To address the above challenges and risks, the Company conducts responsible mineral supply chain due diligence on direct suppliers to its photovoltaic business segment whose supplied materials contain Relevant Minerals through a combination of second-party and third-party audits. The relevant direct suppliers are required to provide their due diligence results, enabling the Company to obtain and trace mineral supply chain sourcing information. The

Company also requires every direct supplier whose supplied materials contain 3TG, cobalt, mica, silicon, quartz or other Relevant Minerals to issue a Conflict-Free Minerals Declaration specifying the mineral types and places of origin.

The Traceability Management Department consolidates information on smelters or refiners, mineral types, places of origin and other relevant matters in the mineral supply chain, and uses database comparisons and other methods to determine whether the supply chain is exposed to conflict-related risks. The Company focuses in particular on smelters or refiners that do not participate in certification and on suppliers for which responsible mineral supply chain due diligence has confirmed conflict-related risks.

5.1.3 Responding to Identified Risks

The Company implements response strategies based on the results of its responsible mineral supply chain due diligence. For smelters or refiners that do not participate in certification and suppliers for which due diligence has confirmed risks, the Company is prepared to provide information, resources and targeted guidance. The Company will also take strict action against suppliers that remain unable to meet compliance requirements after engagement and corrective action; a supplier's failure to act will trigger termination of the business relationship. In addition, the Company provides annual training on responsible mineral supply chain management to communicate its requirements to internal procurement personnel and suppliers, thereby helping suppliers strengthen their management capabilities.

The Company also actively assesses whether Relevant Minerals are necessary in its products. It encourages suppliers whose supplied materials contain Relevant Minerals to seek alternative mineral sources or obtain minerals from non-traditional sources, such as recycled materials and industrial waste, in order to continuously reduce potential compliance risks in the supply chain.

5.1.4 Conducting Due Diligence

As a downstream enterprise in the mineral supply chain, the Company recognizes the importance of conducting responsible mineral supply chain due diligence, as well as the complexity of conducting independent third-party audits for this purpose. The Company uses and relies on external professional tools and authoritative data and requires all direct suppliers to its photovoltaic business segment whose supplied materials contain Relevant Minerals to cooperate with the Company's due diligence. The Company incorporates a responsible mineral supply chain management module into dedicated third-party ESG audits of the supply chain and engages professional third parties to further verify the accuracy of due diligence results. It also encourages all direct suppliers whose supplied materials contain Relevant Minerals to establish responsible mineral supply chain management systems and procedures, conduct their own due diligence, and proactively assess whether smelters or refiners in their supply chains satisfy conflict-free requirements. Through collaboration with suppliers to its photovoltaic business segment, the Company indirectly participates in compliance audits of smelters or refiners.

5.1.5 Publishing and Reporting Due Diligence Results

The Company has established an information disclosure mechanism for responsible mineral supply chain management. Each year, it summarizes and reviews the progress and outcomes of its responsible mineral supply chain due diligence. Through detailed disclosure, the Company seeks to strengthen stakeholder communication and further enhance its management capabilities. The Company publicly discloses progress in responsible mineral supply chain management in its annual ESG report so that relevant parties can understand the current status of its management practices.

5.2 Responsible Mineral Supply Chain Due Diligence Requirements

The Company has zero tolerance for the procurement or use of minerals associated with human rights abuses, the financing of conflict, breaches of business ethics or other adverse impacts. The Company will neither procure nor use minerals associated with the direct or indirect financing of armed groups in conflict-affected and high-risk areas; procure or use minerals associated with human rights abuses, the financing of conflict, breaches of business ethics or other adverse impacts; nor participate directly or indirectly in any activity that finances conflict in conflict-affected and high-risk areas. The Company is firmly committed to neither procuring nor using minerals originating from conflict-affected areas and to refraining from business relationships with suppliers that engage in, or are associated with, sourcing activities in such areas. The Company is committed to complying with applicable United Nations sanctions resolutions and the domestic laws that implement such resolutions.

With reference to the Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas in Annex II to the OECD Due Diligence Guidance (Third Edition) and the Model Supply Chain Policy for Minerals from Conflict-Affected and High-Risk Areas in Annex I to the Chinese Due Diligence Guidelines for Mineral Supply Chains (Second Edition), the Company commits to adopting and widely promoting the responsible mineral supply chain management requirements below. These requirements are incorporated into contracts and/or agreements with suppliers through the Jinko Solar Supply Chain Partner Code of

Conduct. All direct suppliers are required to actively follow the requirements and cooperate with the Company in conducting responsible mineral supply chain due diligence.

5.2.1 Serious Abuses Associated with Mineral Extraction, Transport or Trade

(1) When sourcing from, or operating in, high-risk areas, the Company will neither tolerate nor in any way profit from, assist with, or facilitate any party's commission of the following acts:

(a) The worst forms of child labor, including hazardous work;

(b) Any form of torture or cruel, inhuman or degrading treatment;

(c) Any form of forced or compulsory labor, meaning all work or service exacted from a person under the threat of penalty and for which that person has not offered himself or herself voluntarily;

(d) Other gross human rights violations and abuses, such as widespread sexual violence;

(e) War crimes or other serious violations of international humanitarian law, including crimes against humanity or genocide; and

(f) Mineral products from other areas that do not meet conflict-free standards, such as mineral raw materials identified by the United Nations Security Council as being associated with human rights abuses and environmental degradation caused by mining in the Democratic Republic of the Congo, or minerals produced in Rwanda, Uganda or other countries but originating from Congolese ore bodies.

(2) Where the Company has reasonable grounds to believe that such a risk exists—namely, that an upstream supplier is sourcing from, or is associated with, any party committing the serious abuses specified in paragraph (1)—the Company will immediately suspend or discontinue engagement with that upstream supplier.

5.2.2 Direct or Indirect Support to Non-State Armed Groups

(3) 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 these activities 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 that:

(a) Illegally control mine sites or otherwise control transportation routes, points where mineral resources are traded, or upstream actors in the supply chain; and/or

(b) Illegally tax or extort money or natural resources at mine sites, along transportation routes, or at points where mineral resources are traded; and/or

(c) Illegally tax or extort intermediaries, export companies or international traders.

(4) Where the Company has reasonable grounds to believe that an upstream supplier is sourcing from, or is associated with, any party providing direct or indirect support to non-State armed groups as defined in paragraph (3), the Company will immediately suspend or discontinue engagement with that upstream supplier.

5.2.3 Public or Private Security Forces

(5) In accordance with paragraph (10), the Company agrees to eliminate direct or indirect support to public or private security forces that illegally control mine sites, transportation routes or upstream actors in the supply chain; illegally tax or extort money or minerals at entry points to mine sites, along transportation routes, or at points where mineral resources are traded; or illegally tax or extort intermediaries, export companies or international traders.

(6) The Company recognizes that the role of public or private security forces at and/or around mine sites and/or along transportation routes should be solely to uphold the rule of law, including safeguarding human rights, protecting miners, equipment and facilities, and protecting mine sites or transportation routes from interference with legitimate extraction and trade.

(7) Where the Company or any enterprise in its supply chain contracts with public or private security forces, the Company commits, or will require, that engagement with such forces be conducted in accordance with the Voluntary Principles on Security and Human Rights. In particular, the Company will support or take measures to apply screening policies to ensure that individuals or units of security forces known to have committed gross human rights abuses are not engaged.

(8) The Company will support or take measures to cooperate with central and local governments, international organizations and civil society organizations to identify workable solutions for improving the transparency, proportionality and accountability of payments made to public security forces for the provision of security.

(9) The Company will support or take measures to engage with local governments, international organizations and civil society organizations to avoid or minimize adverse impacts on vulnerable groups, particularly artisanal miners, arising from the presence of public or private security forces at mine sites.

(10) Where the Company identifies a reasonable possibility that such risks exist, it will, taking into account its position in the supply chain, immediately develop, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces described in paragraph (5). If the risk management plan is ineffective after six months, the Company will immediately suspend or discontinue engagement with the upstream supplier. The Company will take the same response where it identifies a reasonable possibility of conduct inconsistent with paragraphs (8) and (9).

5.2.4 Business Ethics

(11) The Company will neither directly nor indirectly offer, promise, give or solicit bribes and will resist solicitation of bribes. It will not offer bribes or fail to comply with relevant international anti-corruption standards and practices in order to conceal or falsify the origin of mineral resources or misrepresent taxes, fees and royalties payable to governments for the extraction, transport, trade, handling or export of mineral resources.

(12) Where the Company has reasonable grounds to believe that there is a risk of money laundering resulting from, or connected with, mineral resources derived from illegal taxation or extortion at entry points to mine sites, along transportation routes, or at points where upstream suppliers trade minerals in connection with extraction, transport, trade, handling or export, it will support or take measures to contribute effectively to the elimination of money laundering.

(13) The Company will ensure that all legitimate taxes, fees and royalties associated with the extraction, transport, trade, handling and export of minerals from high-risk areas are paid to governments. Taking into account its position in the supply chain, the Company commits to disclosing such payments in accordance with the principles of the Extractive Industries Transparency Initiative (EITI).

(14) Taking into account its position in the supply chain, the Company commits to cooperating, as appropriate, with suppliers, central or local government authorities, international organizations, civil society and affected third parties to improve and track performance with a view to taking significant measures within a reasonable time frame to prevent or mitigate risks of adverse impacts. If risk mitigation measures are ineffective after six months, the Company will immediately suspend or discontinue engagement with the upstream supplier.

5.2.5 Occupational Health and Safety

(15) When sourcing from, or operating in, high-risk areas, the Company will neither profit from, assist with or facilitate any party that provides a life-threatening occupational environment to its direct and/or indirect employees and/or any person at its production sites, nor source from or be associated with any such party.

(16) Where the Company has reasonable grounds to believe that an upstream supplier provides a life-threatening occupational environment as defined in paragraph (15), or sources from or is associated with any party that does so, the Company will immediately suspend or discontinue engagement with that upstream supplier.

5.2.6 Child Labor

(17) When sourcing from, or operating in, high-risk areas, the Company will not employ children below the minimum working age prescribed by the laws or regulations of the host country; profit from, assist with or facilitate the employment of children below that age; or source from or be associated with any party that does so. Where the host country has no applicable law or regulation, the minimum working age shall be 16.

(18) Where the Company has reasonable grounds to believe that this risk exists—namely, that an upstream supplier engages in the conduct specified above or sources from or is associated with any party engaging in the conduct specified in paragraph (17)—the Company will immediately suspend or discontinue engagement with that upstream supplier.

5.2.7 Land Rights, Emissions and Artisanal Mining

(19) When sourcing from high-risk areas, the Company will neither profit from, assist with or facilitate any party that causes significant adverse impacts on surrounding soil, air or water resources or seriously violates applicable local laws and regulations, nor source from or be associated with any such party. The Company will support upstream suppliers in taking measures to regularly assess and mitigate the adverse impacts of mining activities on soil, air and water resources.

(20) The Company will not participate in, tolerate or benefit from the extraction of mineral resources on land where the free, prior and informed consent of local and Indigenous peoples has not been obtained; where legal title, leasehold rights, concessions or licenses have been obtained unlawfully; or where extraction violates domestic law.

(21) The Company will not participate in, tolerate or benefit from sourcing mineral resources from, or being associated with, any party that fails to respect and protect the culture and heritage of local and Indigenous peoples, damages their traditional culture and heritage, or conducts mining operations in legally protected areas.

(22) The Company pays particular attention to risks associated with artisanal or small-scale miners, including forced labor, child labor, unsafe working conditions, uncontrolled use of hazardous chemicals and other significant environmental impacts. It encourages upstream suppliers to actively seek production relationships with artisanal or small-scale miners in mining areas while helping to improve their production and working conditions.

(23) Where the Company has reasonable grounds to believe that such risks exist, it will, taking into account its position in the supply chain, immediately develop, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the specific risks described in paragraphs (19)–(22). If the risk management plan is ineffective, the Company will immediately suspend or discontinue engagement with the upstream supplier.

6. Grievance and Reporting Mechanism

The Company provides accessible communication and grievance mechanisms to support the effective implementation of this Policy. All directors, senior management and employees of the Company, as well as its business partners, are obligated to report any actual or suspected violation of this Policy or any applicable law or regulation. Actual or suspected violations, other complaints or related concerns may be reported to jubao@jinkosolar.com. The Company is committed to keeping the identity of whistleblowers and the content of reports strictly confidential.

Appendix: Document Revision Record

Document	Jinko Solar Responsible Mineral Supply Chain Due Diligence Policy		
Version	Revision Description	Effective Date	Issuing Body
2025V1.0	This Policy was issued based on requirements concerning labor rights protection and conflict minerals management under the OECD Due Diligence Guidance. It aims to promote standardized supply chain due diligence and ensure that the sourcing of 3TG and other minerals is not associated with conflict-affected areas or human rights abuses.	2025.7	Risk Compliance and ESG Management Committee
2026V1.1	Refined the wording relating to risk management and added business ethics requirements for conflict minerals management.	2026.3	Risk Compliance and ESG Management Committee

Note: Minor adjustments arising from similar matters during the same year will be consolidated by version in the Document Revision Record. For questions regarding the version or content of this Policy, please contact ESG@jinkosolar.com. Thank you for your interest in Jinko Solar's ESG management.