
Responsible Minerals Supply Chain Due Diligence

Policy of Jinko Solar

I Introduction

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.

II Scope of Application

The Policy applies to all business and operational activities of the Company and its subsidiaries. It also encourages all directors, senior management, and employees of the Company, as well as value chain partners (including service providers, suppliers, 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.

III Release Statement

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.

IV Responsible Minerals Supply Chain Due Diligence Commitments and Actions

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.

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.

i Responsible Minerals Supply Chain Due Diligence Targets

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.

ii Responsible Minerals Supply Chain Due Diligence Procedure

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. Establish and Strengthen the Construction of the Management System

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.

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.

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.

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.

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. Identify and Manage Risks in the Supply Chain

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.

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.

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. Mitigate Identified Risks

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.

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. Conduct Due Diligence

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. Publish and Report Due Diligence Results

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.

iii Responsible Minerals Supply Chain Due Diligence Commitments

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.

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. Regarding Serious Abuses Associated with the Extraction, Transport or Trade of Minerals

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. The worst forms of child labor (hazardous work is one of the worst forms of child labor);
- b. Any forms of torture, cruel, inhuman and degrading treatment;
- c. 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. Other gross human rights violations and abuses such as widespread sexual violence;
- e. War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;
- f. 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. Regarding Risk Management of Serious Abuses

- (1) 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. Regarding Direct or Indirect Support to Non-state Armed Groups

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

4. Regarding Risk Management of Direct or Indirect Support to Non-state Armed Groups

- (3) 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. Regarding Public or Private Security Forces

- (4) 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.
- (5) 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.
- (6) 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.
- (7) 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.

- (8) 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. Regarding Risk Management of Public or Private Security Forces

- (9) 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. Regarding Bribery and Fraudulent Misrepresentation of the Origin of Minerals

- (10) 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. Regarding Money Laundering

(11) 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. Regarding the Payment of Taxes, Fees and Royalties to Governments

(12) 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. Regarding Risk Management of Bribery and Fraudulent Misrepresentation of the Origin of Minerals, Money-laundering and Payment of Taxes, Fees and Royalties to Governments

(13) 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. Regarding Occupational Health and Safety

(14) 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. Regarding Risk Management of Occupational Health and Safety

(15) 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. Regarding Child Labor

(16) 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. Regarding Risk Management of Child Labor

(17) 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. Regarding Land Rights, Emissions and Artisanal Operators

- (18) 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.
- (19) 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.
- (20) 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.
- (21) 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. Regarding Risk Management of Land Rights, Emissions and Artisanal Operators

(22) 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.

V Grievance and Escalation Mechanisms

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.