

# JINKOSOLAR HOLDING CO., LTD.

## SUPPLY CHAIN DUE DILIGENCE POLICY v. 2023

### 1. INTRODUCTION

As part of its commitment to the environment and social responsibility, JinkoSolar Holding Co., Ltd. (the “**Company**”) is a participant to the United Nations Global Compact. Moreover, the Company’s business practice and operations are conducted in accordance with the principles set forth under:

- 1) the UN Universal Declaration of Human Rights;
- 2) the UN Guiding Principles on Business and Human Rights;
- 3) the Ten Principles of the United Nations Global Compact; and
- 4) other international fundamental rules in human rights or environment mandatorily applicable to Group Companies (defined below)

(limbs 1) to 5) collectively the “**Principles**”)

This supply chain due diligence policy (the “**Policy**”) aims at assessing, ensuring and monitoring the compliance with the applicable laws and regulations as well as the Principles by the Company, its affiliates (the Company and its affiliates collectively the “**Group Companies**”) and the Group Companies’ suppliers.

Among others, one of the ultimate goals of this Policy is to ascertain, monitor and detect any event that may not be compliant with the applicable laws and the Principles. Therefore, it establishes the process and the procedures that are conducive to identifying such events and the related remedies or consequences.

Furthermore, this Policy underpins the zero tolerance approach of the Group Companies in relation to forced labor, child labor, harassment and discrimination and to any other form of violation of the human rights.

In addition to the above, this Policy provides guidelines for identifying the most critical risk areas which may give rise to breaches of the applicable laws and/or of the Principles and building a transparent mechanism to address breaches or violations related to the workplace of any Group Companies’ suppliers.

For a comprehensive understanding, this Policy should be read in conjunction with other connected Company’s documents such as:

- the Code of Business Conduct and Ethics;
- the JinkoSolar Supply Chain Partner Code of Conduct (the “**Supplier Code of Conduct**”); and
- the Complaints Procedure for Human Rights and Environment.

The current versions of the afore-mentioned and further documents are available at <https://www.jinkosolar.com/en/site/responsibility> .

### 2. DUE DILIGENCE

The Company commits itself to monitoring the implementation of, and the compliance with, the Principles and applicable laws. For all Group Companies, the Company has developed due diligence processes with the aim of preventing or minimizing risks to human rights and the environment and of ending the violation of human rights-related and environment-related obligations (the “**Due Diligence**”). In this respect, the Company has integrated social, environmental and governance factors into the Company’s risk management, also promoting respect for these rights by employees, directors or executives of the Group Companies and by their suppliers.

In order to identify and minimize human rights and environment related risks and to maintain a responsible supply chain, the Company has formulated the Supplier Code of Conduct, which puts forward specific requirements for suppliers in terms of risk management system, labor, safety, and occupational health, environment and business ethics and is subject to continuous update and review by the Company.

Specifically, the Group Companies require their suppliers to sign the Supplier Code of Conduct and to act in compliance with the requirements and standards set out in the Supplier Code of Conduct. In addition to the above, the Group Companies provide guidance and encourage the suppliers to improve their performance in terms of quality, environment and protection of the human rights.

In order to pursue the Principles, the Company adheres to the concept of fair procurement and equal opportunities and has integrated human rights and the environment into its supplier management system, which also includes other comprehensive factors such as technology, quality, service, supply, and cost. For this purpose, within the Due Diligence, all potential suppliers are evaluated based on the principle of excellence, and the possibility for them to become suppliers of the Group Companies depends on the evaluation results. The Group Companies place orders with suppliers having good social responsibility performance, give priority to cooperating with them, and regularly conduct social responsibility questionnaire surveys and performance appraisal, as well as on-site investigations and audits.

In addition to the above, the Group Companies include in all purchase agreements with suppliers clauses aiming to ensure compliance with all applicable laws and the Principles.

In case of a breach or a violation of such clauses and/or the provisions of the Supplier Code of Conduct, sections 4 and 5 of this Policy apply.

The Company regularly reviews the efficiency of the Due Diligence measures it has taken.

### 3. RISK ANALYSIS

The Company has carried out a risk analysis on the human rights and environment-related risks in its own business area, at the Group Companies and at the Group Companies' suppliers. On the basis of such risk analysis, the Company has identified modern slavery as priority risk.

In order to ensure the implementation of, and compliance with, the applicable laws and the Principles, the Company has set up a risk management system under which it conducts regular, at least annual, risk analyses and, to the extent necessary, ad hoc risk analyses in its own business area, at the Group Companies and at the Group Companies' suppliers.

Having considered the priority risks already identified and taking into account other risks regarded by the Company as particularly significant, the Company has established the following risk and breach levels:

**High Level:** the detection of any ILO forced labor indicators (*i.e.* the eleven indicators on forced labor developed by the International Labor Organization, a description of which can be found at [https://www.ilo.org/global/topics/forced-labour/publications/WCMS\\_203832/lang-en/index.htm](https://www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang-en/index.htm)), any discrimination, harassment, violence (including psychological violence) or any violation or breach of any applicable law and any risk of the afore-mentioned shall be considered as a high level breach or risk.

**Medium Level:** any violation or breach of any health and safety provisions and any risk thereof shall be considered as a medium level breach or risk. However, the violations or breaches of health and safety provisions which cannot be remedied within a reasonably short timeline, shall be considered as high level breaches and shall be treated as such.

**Low Level:** any violation or risk which does not fall within any of the above categories.

A breach, violation or risk will be handled depending on which of the afore-mentioned risk and breach levels it belongs to (for more details, see section 5 below).

Such levels are established in this Policy in order to provide: (a) the suppliers with an additional instrument to guide their conduct to comply with the applicable laws and the Principles; and (b) the stakeholders (*i.e.* the employees, officers, executives or other people working with the Group Companies and the employees, officers, executives or other people working with the Group Companies' suppliers) with a guideline on how a violation shall be addressed. Without prejudice to the above, such categories shall not be considered as exhaustive since, following the assessment conducted by the Company's Supply Chain Management Department on a case by case basis, other breaches not expressly mentioned thereunder could fall within any of the High Level, Medium Level or Low Level categories.

#### 4. REPORTING CHANNELS

Violations and breaches of the applicable laws and/or of the Principles may get, or may be brought to, the attention of the Company's Supply Chain Management Department by way of the Complaints Procedure for Human Rights and the Environment or any other applicable reporting mechanism. Further information is available at <https://www.jinkosolar.com/en/site/responsibility>.

#### 5. RISK AND BREACH HANDLING MECHANISM

Whenever the Company obtains sufficiently reliable and sufficiently specific information indicating or evidencing a breach or a violation of the applicable laws or of the Principles, the following applies:

- (i) Within five working days from obtaining such information, the Company's Supply Chain Management Department shall determine under which of the risk and breach levels established in section 3 of this Policy the alleged violation (if and where grounded) shall be allocated.
- (ii) In case a breach is classified as **Low Level**, the Company's Supply Chain Management Department shall determine a deadline (on a case by case basis) to provide the Company's Supply Chain Management Department with evidence that the relevant breach or violation was remedied. Should such term not be sufficient, the Company's Supply Chain Management Department may decide to extend the deadline to remedy the relevant breach or violation. In case of failure to remedy within the deadline (as potentially extended), the Company's Supply Chain Management Department shall assess, on a case by case basis, how to address the matter.
- (iii) In case a breach is classified as **Medium Level**, the Company's Supply Chain Management Department shall provide both instructions and a deadline to provide the Company's Supply Chain Management Department with evidence that the relevant breach or violation was remedied. Should such term not be sufficient, the Company's Supply Chain Management Department may decide to extend the deadline. The Company, at the expiry of such deadline (as potentially extended), shall inspect whether the provided instructions were implemented to its satisfaction. In case of failure to remedy within the deadline (as potentially extended) or to comply with the instructions, the Company's Supply Chain Management Department shall assess, on a case by case basis, how to address the matter (including, but not limited to, the termination of the relevant business relationship with the supplier).
- (iv) In case a breach is classified as **High Level**, the Company's Supply Chain Management Department shall provide both instructions and a deadline of 24 hours to provide the Company's Supply Chain Management Department with evidence that the relevant breach or violation was remedied. The Company, at the expiry of such deadline, shall inspect whether the provided instructions were implemented to its satisfaction. In case of failure to remedy within such deadline, the business relationship with the relevant supplier shall be terminated by the relevant Group Company.

## **6. RECORDS**

Each Group Company shall be responsible for recording information related to supply chain due diligence. Recording comprises collecting, filing and safekeeping.

In particular, the following information must be recorded: (i) the nature of the breach or violation; (ii) the written breach or violation report and key documental evidence; (iii) the actions taken by the Company's Supply Chain Management Department and the actions taken by the supplier in light of the received instructions; and (iv) the Company's Supply Chain Management Department written statement of the decisions.

All records must be complete, accurate and reliable in all material aspects. The relevant Group Company shall store and keep the afore-mentioned data in accordance with the laws applicable in the jurisdiction in which such data are collected and/or stored.

## **7. PUBLIC REPORTING**

To the extent required under the applicable laws and regulations, the relevant Group Company shall draft a statement or report regarding supply chain due diligence and publish it and/or submit it to the competent authority. Such mandatory statements or reports, together with other reports, are available at <https://www.jinkosolar.com/en/site/responsibility>.

## **8. CONFIDENTIALITY**

Any employees or stakeholders involved in the procedure by the Company's Supply Chain Management Department for the purposes of the investigation shall maintain the confidentiality of all information entrusted to her or him by any individual involved at any scope in the overall process regulated by this Policy. Confidential information includes, among others, the evidence, the finding of the investigations, the state of the procedure, and the parties involved.

Such information may only be disclosed when disclosure is authorized by the relevant Group Company or legally required.

## **9. EXPECTATIONS PLACED ON EMPLOYEES AND SUPPLIERS**

As further specified in the Code of Business Conduct and Ethics and in the Supplier Code of Conduct, the Company expects from its own employees, from the Group Companies and from the Group Companies' suppliers that they comply with the Principles as well as the applicable laws and regulations. Particular attention should be paid to the Company's priority risks (see section 3 of this Policy). Non-compliance can trigger certain rights of the Company, including but not limited to the right of termination and the right to claim damages.