

Jinko Solar Human Rights Management Policy

Version: 2026V1.1

1. Overview

Jinko Solar Co., Ltd. (hereinafter referred to as ‘Jinko Solar’ or ‘the Company’) has formulated the Jinko Solar Human Rights Management Policy (hereinafter referred to as ‘this Policy’) in accordance with the requirements of international initiatives and standards, including the Universal Declaration of Human Rights, International Labour Organization Conventions, the United Nations Guiding Principles on Business and Human Rights, and the Code of Conduct for Multinational Enterprises. This Policy sets out the Company’s commitments, principles and positions on human rights management.

2. Scope of Application

This Policy applies to all business and operational activities of the Company and its subsidiaries and branches, including production operations and business facilities, products and services, distribution and logistics, and waste management that are directly or indirectly controlled or operated by the Company or its subsidiaries and branches. The Company encourages all directors, senior management and employees (including full-time, part-time and dispatched employees), as well as value chain partners (including service providers, suppliers and contractors), to follow this Policy and work together to respect and protect human rights. This Policy also applies to other key business partners, including distributors, consultants and outsourcing partners. It further applies to the Company’s global business activities, such as mergers and acquisitions, and related due diligence activities. The Company also undertakes to exercise its influence over non-controlling joint ventures and encourage them to act in accordance with this Policy.

3. Publication Statement

Version control for this Policy and its commitments is managed by the Risk Compliance and ESG Management Committee. Relevant functions, including the departments (teams) under the Human Resources function and the Supply Chain Management Department, track annual management progress and conduct policy reviews and updates, which are reviewed and confirmed by the Board of Directors and senior management. As a general rule, this Policy is reviewed annually to ensure that it remains current and applicable. This Policy is prepared in Chinese and English. In the event of any inconsistency, 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 has zero tolerance for any human rights violation and is committed to protecting every employee’s fundamental rights from multiple perspectives and safeguarding employees’ lawful rights and dignity.

- (1) The Company commits to strictly complying with the laws and regulations of each location where it operates, achieving equal pay for equal work for 100% of employees, ensuring that employees receive a competitive living wage, and attaining 100% coverage of human rights risk assessments across its self-operated operations and key suppliers.
- (2) The Company commits to prohibiting forced overtime, supporting employees' work-life balance, and ensuring that employees receive overtime pay or compensatory time off as required by law.
- (3) The Company commits to regularly conducting living wage surveys, optimizing its wage structure, ensuring that base wages cover employees' essential expenses for food, clothing, housing and transportation, and providing hardship allowances to employees experiencing financial difficulty due to unforeseen events. The Company strives to maintain wage benchmarks for 100% of employees above the applicable regional living wage.
- (4) The Company commits to providing all employees with equal access to benefits and maintaining their regular compensation and benefits during statutory leave and other leave entitlements, including statutory paid leave.
- (5) The Company commits to safeguarding employees' occupational health and safety through systematic and standardized management, applying occupational health and safety requirements across all operating sites, and consulting employee representatives on material updates to policies and management measures.

5. Actions and Practices

At Jinko Solar, the Board of Directors serves as the highest governance body. The Strategy and Sustainable Development Committee coordinates all ESG-related matters, while the Risk Compliance and ESG Management Committee advances human rights governance practices and conducts regular reviews for improvement. The Company's human rights practices focus on three principal areas: protecting fundamental labor rights, promoting labor compliance among business partners, and enhancing human rights due diligence.

5.1 Management Structure and Dedicated Functions

The Company's senior management is fully involved in labor and human capital management. The Board of Directors is the highest body responsible for oversight and guidance on these matters, while its dedicated Strategy and Sustainable Development Committee exercises day-to-day oversight and guidance on behalf of the Board. The Risk Compliance and ESG Management Committee coordinates the management of labor risks and due diligence across the value chain. Its Secretariat develops objectives and plans for human rights risk prevention and due diligence, while the Human Resources function, Supply Chain Management Department, Traceability Management Department and other functions associated with human rights matters support the achievement of specific objectives and the implementation of related actions.

5.2 Protection of Fundamental Labor Rights

The Company respects and protects employees' fundamental rights. It expressly prohibits all forms of human trafficking, forced labor and modern slavery, the use of child labor, and all forms of discrimination and harassment. The Company respects and safeguards employees' rights in key human rights areas, including working conditions (such as reasonable working hours, fair compensation and benefits, occupational health and safety, training and development, and channels for labor-management communication), freedom of association and collective bargaining. It also actively organizes thematic training to strengthen awareness of employee rights among employees and managers.

Prohibition of Forced Labor, Child Labor and Human Trafficking: The Company prohibits all forms of forced labor and modern slavery, including bonded labor, indentured labor, enslavement and human trafficking. It shall not restrict employees' freedom of movement within the workplace or their freedom to leave Company premises, use prison labor, require job applicants to pay recruitment fees as a condition of employment, or recruit or engage workers

through violence, threats, fraud, retention of identity documents, deposits, guarantees or similar means. The Company expressly prohibits child labor and prevents its occurrence through identity verification, routine site visits and spot checks, and social responsibility awareness programs. The Company has also established a child labor remediation mechanism, as detailed in the Management Procedures for Child Labor and Underage Workers, to ensure the effective operation of child labor remediation and control procedures and the effective prevention and control of child labor risks.

Respect for Freedom of Association and the Right to Collective Bargaining: The Company respects employees' rights to assemble and associate freely, join trade unions and engage in collective bargaining in accordance with the laws and regulations of the locations where it operates. The Company and its trade union have entered into a collective agreement covering areas including, but not limited to, occupational health and safety, working conditions, career management and training, equality and diversity, anti-discrimination and anti-harassment, and support for female employees. The Company regularly convenes employee representative congresses for face-to-face consultation on these matters, ensuring that employees' concerns receive timely responses and feedback through institutionalized channels. Before implementing major workforce changes, such as suspension or relocation of a plant or large-scale workforce adjustments, the Company establishes a minimum notice period in accordance with company law and other applicable laws, promptly notifies employees before the change occurs, and provides timely advisory support. This gives employees time to manage personal matters and plan their careers, thereby mitigating any material adverse impact of such changes.

Creating an Equal and Respectful Work Environment: The Company's Anti-Discrimination Management Procedures set out the principles of equal employment opportunity, diversity, equity and inclusion. They ensure that employees are not subject to any form of discrimination or unfair treatment in recruitment, compensation and benefits, training, promotion, termination, retirement or any other aspect of human resources management on the basis of race, caste, color, sex, nationality or national origin, ethnic or social origin, property or economic background, religion, age, language, disability, pregnancy, sexual orientation, marital or family status, political affiliation, trade union membership, regional origin or tribal ancestry. The Company prohibits all forms of violence, insult, harassment and other unfair treatment, including sexual harassment and sexual violence. To enhance employee communication, the Company has established open, trusted and accessible two-way communication channels, including Dialogue with Jinko Executives, Jinko Sunny Day and employee representative congresses, through which it listens and responds to employees' suggestions and feedback.

Ensuring Good Working Conditions: In its business activities, the Company strictly complies with the laws, regulations and standards on labor rights and occupational health and safety established by the countries and local authorities where it operates. It provides employees with compliant working conditions and a safe and healthy work environment, pays wages in full and on time, and provides an increasingly diverse range of benefits. The Company also offers employees a variety of skills and capability-building programs, development platforms and opportunities, supporting their growth alongside the Company.

Working Hours Management	The Company has established the Attendance Management System, which specifies employee working hours and attendance under three principal arrangements—standard working hours, comprehensive working hours and flexible working hours—based on the nature of each position. The Company monitors employee scheduling and attendance data online and prohibits forced overtime. Before working overtime, employees must submit an overtime request stating the
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	reason and work to be performed and obtain approval from their supervisor. Depending on the circumstances, the Company provides overtime pay or compensatory time off.
Compensation Management	The Company regularly monitors compensation data, including the average and median compensation of male and female employees, to understand the gender pay gap, and publicly discloses the relevant information in its annual ESG report.
Living Wage Management	The Company has established the Employee Basic Living Needs Survey Procedures. It conducts employee basic living needs surveys by combining analysis of publicly available data with internal employee research, considering food, nutrition, water, housing, education, healthcare, transportation, clothing and other essential needs, including necessities required for unforeseen events. Survey data are compared with publicly available living wage data. The Company commits to maintaining employee income above local living wage levels, providing in-kind benefits from time to time, and offering targeted assistance to employees facing financial hardship due to unforeseen events, thereby supporting decent work and living conditions. ¹
Benefits Management	The Company standardizes its benefits system across categories including statutory benefits (such as statutory paid leave) ² , health protection benefits, incentive benefits, holiday and cultural benefits, and living support benefits. For overseas employees, locally tailored Benefits Management Systems specify applicable benefits and safeguards. The Company also extends employee social protection beyond public programs through initiatives such as customized commercial insurance plans, personalized holiday benefit packages and emergency assistance for employees in hardship.
Occupational Health and Safety	Guided by the workplace safety principle of ‘safety first, prevention as the priority, and comprehensive management,’ the Company is committed to creating a safe and healthy work environment for all employees and stakeholders.
Training and Development	The Company is committed to building fair and transparent career advancement pathways and providing personal development and career planning opportunities for all employees, ensuring that their efforts and talents are fully recognized and rewarded. It provides extensive learning resources for employees in different positions and offers customized training and development

¹In 2025, the Company conducted employee basic living needs surveys at several sites. The survey data showed that the lowest monthly net take-home pay of the Company’s employees significantly exceeded the amounts identified in the basic living needs surveys, and that all employees’ income was sufficient to meet their basic living needs.

²The Company complies with local regulatory requirements: employees who have worked continuously for one year or more are entitled to paid annual leave. The number of annual leave days granted is determined by the employee’s total years of service—either 5, 10, or 15 days. Employees’ actual entitlement to annual leave is subject to the provisions set forth in the *Employee Benefits Management Policy*.

	guidance based on employee needs, with the aim of fostering a diverse, inclusive learning organization.
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5.3 Responsible Supply Chain Governance

The Company requires all suppliers and their upstream suppliers to strictly comply with the requirements of international initiatives and standards, including the Universal Declaration of Human Rights, International Labour Organization Conventions, the United Nations Guiding Principles on Business and Human Rights, and the Code of Conduct for Multinational Enterprises. They are expected to actively manage their ESG performance in labor rights and labor practices—including reasonable working hours, fair compensation and benefits, occupational health and safety, training and development, and channels for labor-management communication—to avoid or reduce social responsibility risks arising from production and business activities. The Company requires direct suppliers to formulate relevant policies and operational commitments by reference to the human rights commitments and action requirements applicable to the Company’s own employees. It conducts regular ESG audits of direct suppliers to ensure that their labor rights management and practices meet the Company’s requirements.

Labor Rights and Labor Practices: Suppliers shall ensure that their employees enjoy fundamental labor rights. They shall not employ or use child labor in any form or engage in human trafficking; they shall eliminate forced labor and prohibit all forms of harassment, abuse and employment discrimination. Suppliers shall protect employees’ equal rights, including their lawful rights to join trade unions, freedom of association and collective bargaining. They shall ensure employees’ freedom of movement, speech and expression; provide appropriate working and rest hours; offer equal compensation and benefits; pay a living wage; and provide statutory paid leave. Suppliers shall maintain accessible internal channels for labor-management communication, ensuring that employees’ suggestions and feedback are heard and addressed promptly. Before implementing major workforce changes, such as suspension or relocation of a plant or large-scale workforce adjustments, suppliers shall notify employees promptly and provide timely advisory support so that employees have time to manage personal matters and plan their careers.

Diversity and Skills Training: The Company encourages suppliers to foster a diverse and inclusive organizational culture and to respect and protect the lawful rights of vulnerable groups, including women, ethnic minorities and employees with disabilities. Suppliers shall provide employees with equal access to skills training and career advancement opportunities.

Occupational Health and Safety Protection: The Company requires suppliers to strictly comply with applicable occupational health and safety laws and regulations, establish robust occupational health and workplace safety management systems, and provide employees with a safe and healthy work environment. It also requires suppliers to attend to employees’ mental health and strengthen team cohesion. The Company actively provides occupational health and safety training to suppliers to help enhance their management capabilities and reduce workplace safety incidents.

5.4 Strengthening Human Rights Protection for Business Partners

In addition to comprehensively managing human rights risks within its own operations and supply chain, the Company continues to embed the principles of human rights protection among partners throughout its business ecosystem and is committed to building an inclusive and equitable business environment.

Human Rights and Labor Practice Requirements for Business Partners: In addition to suppliers, the Company encourages other value chain partners, including service providers and contractors, and other key business partners, including distributors, consultants and outsourcing partners, to formulate dedicated policies covering fundamental labor rights and labor practices—such as reasonable working hours, fair compensation and benefits, occupational health and safety, training and development, and channels for labor-management communication—by reference to the Company’s human rights commitments and action requirements for its own employees and supply chain companies. Partners are also encouraged to establish supporting operating procedures to ensure that their business activities comply with international labor standards and corporate social responsibility norms.

Respect for the Rights of Indigenous Peoples: The Company adheres to the United Nations Declaration on the Rights of Indigenous Peoples and respects the lawful rights of community residents in the areas where it operates. While supporting the livelihoods and development of residents—particularly children, persons with disabilities, Indigenous Peoples and other vulnerable groups—the Company embraces cultural diversity and promotes cultural inclusion through systematic measures that enable local communities to share in the benefits of economic, social and cultural development.

5.5 Enhancing the Labor Rights Due Diligence Mechanism

The Company has fully integrated labor rights due diligence into its risk management system. It covers the business and operational activities of the Company and its subsidiaries and branches, the value chain and other activities related to the Company’s business, and new business relationships, including mergers, acquisitions and joint ventures. The Board of Directors is the highest body responsible for oversight and guidance on labor rights risk management and due diligence. The Strategy and Sustainable Development Committee exercises day-to-day oversight and guidance on behalf of the Board, while the Risk Compliance and ESG Management Committee coordinates labor rights risk management and due diligence. The Human Resources function, Supply Chain Management Department, Traceability Management Department and other functions associated with labor rights matters support the achievement of specific objectives and implementation of actions. Labor rights due diligence covers issues including, but not limited to, forced labor, human trafficking, child labor, freedom of association, the right to collective bargaining, discrimination and working conditions, including reasonable working hours, fair compensation and benefits, occupational health and safety, training and development, and channels for labor-management communication. Groups covered include, but are not limited to, Company employees, third-party workers, children and underage workers, women and vulnerable groups, migrant workers, Indigenous Peoples and local communities.

Risk Identification: The Company uses an integrated, multidimensional approach to identify labor risks. It systematically reviews internal policies, systems and procedures against legal and regulatory compliance requirements, such as International Labour Organization Conventions and local labor laws, and captures diverse stakeholder concerns through engagement mechanisms such as employee surveys, community interviews and supplier questionnaires. On this basis, the Company uses risk-mapping tools to systematically assess potential labor issues and develops risk heat maps for specific business contexts, including self-operated operations, the value chain and new business relationships. This ensures that labor rights risk identification covers every level of the activity chain and all areas of potential impact. The Company reviews the distribution of risks annually to ensure that the results of potential risk identification remain current and applicable.

Risk Assessment and Prioritization: After identifying potential labor risks, the Company evaluates each risk from the perspectives of impact materiality—including the likelihood, scale, scope and irremediability of the impact—and

financial materiality—including the likelihood and magnitude of the financial impact—to determine its overall level of impact. Based on the assessment results, the Company prioritizes the risks and identifies high-risk areas and critical business activities, providing a basis for targeted action plans.

Action Plan Development: The Company develops detailed action plans for identified potential labor risks, particularly those associated with high-risk areas and critical business activities. Each action plan specifies the responsible functions, concrete measures, timeline and expected outcomes to ensure that labor risks are effectively mitigated or eliminated. Actions include improving ESG management in self-operated operations and the supply chain, strengthening training for employees and stakeholders, and implementing community engagement programs.³

Due Diligence Implementation: The Company conducts due diligence through site visits, document reviews, interviews, audits and other methods to collect robust evidence and data supporting risk assessments and the development of response measures. For self-operated operations, the Company continues to conduct internal and third-party audits of production sites in accordance with the ESG Audit Management System and ESG Audit Checklist. In the supply chain, the Company has established an ESG audit system combining online and on-site activities with second- and third-party audits, and continuously audits suppliers' ESG performance.

Continuous Improvement and Action Monitoring: The Company has established an ongoing mechanism for labor risk improvement and action monitoring and regularly reviews and evaluates the implementation of actions. Through continuous improvement and action monitoring, the Company effectively prevents and controls labor risks.⁴

Remediation: The Company has established a robust remediation mechanism for labor violations. Substantiated violations are addressed in a graduated manner based on the severity of their impact. Measures may include requiring an apology, issuing a verbal warning or formal notice of criticism, providing financial or non-financial compensation, or terminating the employment contract in accordance with law. For infringements that cause a material impact, the Company develops a dedicated corrective action plan and follows up continuously to ensure effective implementation of

³In 2025, the Company implemented human rights risk mitigation programs across all operations and among key suppliers, covering 15 operating sites and 100 key suppliers. In its self-operated operations, the principal human rights risk concerns related to working hours management and overtime approval. Corrective measures included: (1) developing a working hours monitoring platform to track overtime; (2) establishing attendance and working-hour thresholds so that overtime beyond a preset limit requires control and approval by a more senior manager, thereby preventing unreasonable and unproductive overtime; (3) strengthening employee training and communication to help employees understand overtime limits and working hours management requirements; and (4) optimizing work arrangements by staggering production during peak seasons to smooth sudden order demand and applying more flexible working-hour requirements to frontline employees, while maintaining work quality, to provide them with adequate flexibility and rest. By the end of 2025, all corrective measures covered 100% of operating entities.

⁴The Company's human rights risk prevention and control measures were effective. In 2025, no material significant risks were identified during internal or external audits at any of the Company's sites within its self-operated operations. Of the non-conformities identified, 90.4% were corrected and closed within six months. A small number of matters that could not be corrected in the short term remain subject to ongoing follow-up until closure. Across the supply chain, suppliers' ESG risks were generally under control. Only one supplier fell below the Company's ESG management standards; the Company will continue to urge improvement and arrange a follow-up review.

remediation and minimize the adverse impacts of labor risks. The Company also provides labor-related thematic training from time to time to senior management, employees, suppliers and other key stakeholders. Through case studies, interactive workshops and other formats, this training reinforces awareness of the importance of labor issues and strengthens stakeholders' awareness and practical capabilities in labor rights protection.⁵

Stakeholder Communication: The Company has established a disclosure mechanism for labor due diligence and annually summarizes and reviews its progress and outcomes. Through comprehensive disclosure, the Company seeks to strengthen communication and engagement with stakeholders. It publicly reports progress in labor compliance management in its annual ESG report so that stakeholders can understand the current status of the Company's labor compliance management.

6. Grievance Mechanism

The Company provides formal, publicly available feedback channels for internal and external stakeholders, including the reporting mailbox jubao@jinkosolar.com, and encourages stakeholders to proactively identify and report risks. All directors, senior management and employees of the Company—including full-time, part-time and dispatched employees—value chain partners—including service providers, suppliers and contractors—and any other stakeholders—including distributors, consultants and outsourcing partners—may use this channel anonymously or under their real names to report any actual or potential non-compliance to the Company.

The Company discloses its feedback channels in this Policy and through other open and transparent means to ensure that they are accessible to internal and external stakeholders. Upon receiving a report, the Human Resources function promptly reviews its substance. If the matter falls within the remit of Human Resources, a designated representative conducts the investigation. If the report is found to be unsubstantiated, the investigation is terminated immediately and the case is archived. If it is substantiated, the matter is escalated and handled through the relevant levels until it is effectively resolved.

To better protect the privacy of reporting persons, the Company has established a dedicated internal case-routing procedure. Information is limited to the reporting person, the case recipient and persons involved in the matter, and the content of communications is kept confidential to the fullest extent permitted by law and practicable. The Company has zero tolerance for discrimination or retaliation and strictly prohibits retaliation in any form.

⁵The Company provided appropriate warning and awareness education on human rights violations. In 2025, the Company neither caused nor directly or indirectly contributed to any material human rights violation.

Appendix: Document Revision Record

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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.