

JA Solar Code of Conduct

(Version 2024)

 **Message from the Executive President**

To be a great enterprise, the road is like a strop, and the walkers have no frontiers

Since its establishment in 2005, JA Solar has always stayed true to our corporate mission of **“Develop solar power to benefit the entire human race”** and consistently adhered to the road of green, low-carbon and high-quality development. **“Enterprise Spirit: Sincerity, Simplicity, Reverence and Gratitude”** are the corporate spirit of JA Solar, which guides us to **“Enterprise Attitude: Integrity and Professional ethics”** and walk towards the light.

Our journey has been long, and we have paved the way with sunshine. Our commitment to the core values of the company has never wavered: **Customers First, Employees Well-being, Benefit Shareholders**. We need to understand who we are, where we are, and where we are going.

To help every employee understand JA Solar's core values, the Group has developed this Code of Conduct. Please refer to this guideline frequently as a guide to how to conduct business on behalf of JA Solar both internally and externally.

Mr. Yang Aiqing, the Executive President of JA Solar
August 2024

I. About the Code of Conduct

This Code of Conduct is the corporate standard of conduct and business ethics for JA Solar employees. To support our employees for understanding of the core values and personal responsibility, this Code of Conduct has been developed and reviewed by the EHS Department and the Legal department at the headquarters. We are committed to continually request for stakeholder suggestions and review this document regularly throughout its implementation, and make revisions when necessary.

II. Scope

Applicable to all business departments and subsidiaries of JA Solar and all entities controlled by JA Solar.

III. Responsibilities

- The department head is responsible for communicating this Code of Conduct with the direct subordinates to ensure that employees understand and abide by this Code of Conduct.
- Employees are responsible for understanding and abiding by this Code of Conduct and reporting suspected violations. JA Solar encourages employees to report any doubt about compliance with this Code of Conduct. Every employee will prove that they have reviewed, understood and would abide by this Code of Conduct every year.

IV. Content

■ Compliance with Laws & Regulations and Professional Practice

All activities of JA Solar must fully comply with the laws, norms and administrative regulations of the country or region in which it operates. This Code of Conduct encourages participants to do better than regulations, drawing on internationally accepted standards and industry norms to promote social and environmental responsibility and business ethics. This Code of Conduct is in line with the United Nations Guiding Principles on Business and Human Rights, and is derived from the internationally recognized standards. This includes, but is not limited to, the 10 principles of UN Global Compact, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights in Work Groups, and the United Nations Universal

Declaration of Human Rights. This Code of Conduct also meets industry requirements such as the Responsible Business Alliance (RBA) Code of Conduct.

■ **Employee Obligations**

It is the responsibility of all managers and employees to comply with this Code of Conduct. Compliance shall be supervised by supervisors under the guidance of company managers, and be subject to audit regulations.

JA Solar shall regularly communicate this Code of Conduct to all employees, including publicizing the contents of this policy. Employees of JA Solar must abide by the provisions of this Code of Conduct. Code of Conduct training shall be included in the induction training for new employees.

■ **Respect for the Rights of Others and Interested Parties**

We will provide a professional and dignified workplace. We will treat customers, suppliers, other business partners and competitors with respect, courtesy and fairness, and conduct business in a professional manner. We will not treat anyone unfairly through manipulation, concealment, abuse of privileged or confidential information, material misrepresentation or other unfair behavioural practices.

■ **No Discrimination, Inclusiveness, Equity and Diversity**

We are committed to providing an inclusive and diverse workplace. We will fully abide by all fair employment laws in all employment practices. We do not have any discrimination in any employment opportunity, treatment or benefits. We do not discriminate on the basis of ethnicity, race, age, religious beliefs, disability, pregnancy, gender, sexual orientation, marital status or any other circumstance protected by applicable law. We provide reasonable convenience conditions for suitable disabled employees in accordance with applicable laws and regulations. We will not tolerate discriminatory orientation. We prohibit harassment, including verbal, written or in physical actions, which threaten, intimidate or coerce job applicants, employees, suppliers or any other person who works for us or on our behalf. At the same time, any offensive sexual advance, sexual demand or other verbal or physical behavior with sexual intent that meet the following conditions are forbidden:

- a) Any statement expressed or implied as the term of office or terms of employment;
- b) Anything used as the basis of employment decision;
- c) Work environment unreasonably hindering work performance or creating an intimidating

atmosphere.

■ **Prohibition of Using Child Labour and No Forced Labour**

Under the ILO Convention, we are committed to banning slavery, forced labour, human trafficking, and child labour. In JA Solar, we do not allow the child labour (usually under the age of 16), and the age of employees must comply with local laws and regulations. Young workers under the age of 18 shall not perform work with high safety risk and chemical hazards, includes night shifts and overtime. We prohibit the forced labour, slavery, imprisonment and apprenticeship in any forms. We prohibit exploiting the employees and unlawful liberty confining through threatening, forcing, coercion, violence, abduction or cheating. We prohibit any fee incurred by the hiring which is charged to the employees. We prohibit any forms of detaining or depriving of the employees' ID cards, passports or job license. The employees shall work at their sole will and be entitled to the leisure time.

■ **No Retaliation**

We will never tolerate retaliation against anyone who expresses doubts about complaints about discrimination (being discriminated), or illegal intrusion, any conduct prohibited by this Code of Conduct, or who cooperates in the investigation of any complaint. Under no circumstances should a complaint made under the channels described below be the basis for disciplinary action or other retaliatory action. Please refer to the chapter of Whistle-blowing of violations.

■ **Management System**

We are committed to providing our customers with safe, effective and high-quality products to satisfy their needs. We strive to explore innovative solutions for the needs of our customers and to provide excellent service to all of our customers.

We shall abide by all applicable national and international regulatory requirements with regard to our products. These requirements are related to the development, operations, products and services of JA Solar, as well as quality system requirements, advertising, handling of customer complaints and many other aspects.

The Management of JA Solar is responsible for monitoring and ensuring that the relevant employees are aware of and follow the processes of the product regulations applicable to their responsibilities. If you are aware of any significant product regulatory compliance issue or have any doubt, please report them to your department head or Regulatory Affairs Department.

■ **Environmental Compliance and Sustainability**

We respect our community and conduct our business in an environmentally responsible manner. The JA Solar Group has joined the United Nations Global Compact organization (UNGC) and integrated the concept of sustainable development into its core business. We are committed to comply with the requirements of product environmental restricted substances regulations, purchase green materials, consume green energy and produce green products. We conduct LCA research on products and responsible disposal of end-of-life products. We practice strict economy and advocate the development concept of "Circular Economy", improve energy efficiency, reduce greenhouse gas emissions in operation and products, discharge waste gas and wastewater according to law and dispose waste in compliance. The company has obtained ISO14001 environmental management system certificate and ISO50001 Energy management system certificate, and continues to promote the environmental protection and sustainable development of the whole JA Solar Group according to the requirements of the management system.

■ **Occupational Health and Safety**

We will care about occupational health and safety of our employees. Both JA Solar and its employees shall abide by all occupational safety and health laws applicable to their activities. JA Solar provides its employees with a safe and healthy working environment. JA Solar has passed ISO45001 occupational health and safety management system certification.

■ **Sustainable Supply Chain**

We are committed to providing our customers with products that meet the requirements of their local regulations, so we do our best to spread the concept of sustainable procurement in the entire supply chain. We purchase materials and establish product traceability system with ESG perspectives. We are committed to conduct due diligence on suppliers to meet the relevant regulatory requirements of customers in different countries and regions, such as Non-conflict minerals, RoHS, REACH, Low Carbon etc. At the same time, we build long-term partnerships with suppliers to cope with the challenges.

■ **Distributor, Agency or Agent**

We require our independent distributors, agencies and agents to abide by this Code of Conduct when conducting legitimate transactions in the name of JA Solar. The company manager who is responsible for dealing with the relationship with independent distributors, agencies or agents shall ensure that the terms of

such relationship are agreed in writing, and that these independent distributors, agencies or agents have obtained a copy of this Code of Conduct and agree to abide by it. We will conduct periodically due diligence on business ethics of distributors, agencies or agents in both on-site and off-site manner, so as to determine the extent of due diligence and risk. The distributors, agencies or agents, who are exposed to high risks, will be given a deadline to rectify the situation. If they fail or refuse to rectify the situation, we will consider cancelling the cooperation with them.

■ **Business Ethics**

It mainly covers the prohibition of such aspects as false statements, false records, conflicts of interest, insider trading, disclosure of trade secrets, theft, embezzlement of company assets, corruption and bribery and unfair competition.

■ **Finance and Records**

All company records and reports shall be truthfully documented and properly maintained to ensure compliance with the law and our ethical standards, and to prevent fraud and error. Accounting records and reports shall comply with applicable laws and relevant accounting standards. We will not knowingly provide any false, misleading or incomplete information to anyone (inside or outside JA Solar) who prepares or performs any authorized corporate audit. Finance and accounting staff are responsible for ensuring that any significant accounting and auditing matter have been reported to the Financial Supervisor.

■ **Conflict of Interest**

Conflicts of interest, where any personal interest of an employee may conflict with the responsibilities or other interest to the company, such employee shall disclose interest details to the management in a timely manner. These interests include, but are not limited to, employment outside JA Solar, other activities and economic interests, processing and sharing of internal information of JA Solar, business opportunities belonging to JA Solar and conflicts of interest involving family members and other personal relationships. Ensure that personal political donations and activities will not involve funds or other assets of JA Solar. The common examples of practices to avoid conflicts of interest are described as follows:

- We shall select suppliers and other business partners based on factors such as quality, price, reliability, service and delivery deadlines, but not based on personal friendships or family ties or potential personal economic benefits;

- We do not accept gifts, loans or any other valuable benefits from suppliers, except for low-cost non-cash gifts that are permitted by applicable laws and conform to local business practices and any applicable professional or industrial codes;
- We are not allowed to make unauthorized use of company property, employees, products, supplies or other resources, including information, for external activities or any other purpose. Employees are not allowed to engage in other businesses other than the JA Solar's business during their working hours;
- If we identify a business opportunity that would be advantageous to JA Solar, or from which JA Solar would benefit, we must inform our department head. We shall never take advantage of the opportunity ourselves or refer it to friends or relatives;
- The employees of JA Solar are not allowed to engage in any business transaction that would benefit them directly or indirectly on account that they are agents, owners, shareholders, employees, managers or directors of suppliers, competitors or clients of JA Solar; the employees shall neither offer, nor imply that they represent JA Solar in any external activity, unless they are expressly authorized to represent JA Solar in the aforementioned activities on behalf of JA Solar.

■ **Information Management and Intellectual Property Rights**

We shall keep confidential for the following information (including but not limited to):

- Our business plans, budget and strategic plans, financial information;
- Our know-hows and information;
- Information about business transactions;
- Employee's compensation, personal information and personnel plans;

Confidential information can be recorded in multiple ways, including paper documents, videos, audio and other forms of data. We shall protect our confidential information from unauthorized access or inappropriate disclosure. We shall take preventive measures to protect it from damage or loss. We shall protect our intellectual property rights by obtaining patent or trademark protection and preventing trade secrets from being made public.

We shall be ethical in refusing to accept confidential information from other parties unless we are authorized

to do so, such as confidentiality agreement or, or entrustment agreement. Where we do receive confidential information from other parties, we will abide by the applicable law and any applicable confidentiality agreements to protect its confidentiality. Where we receive confidential information from our clients, we shall protect its confidentiality. We do not discuss our clients' confidential information with third parties or others who do not need the information for the purposes of carrying out the JA Solar's business. Improper usage or unauthorized disclosure of confidential information may result in disciplinary punishment, including dismissal.

Please consult your line manager if you are unsure whether someone is authorized to receive information, or whether any other information is confidential and must be protected.

■ **Prohibition of Corruption and Bribery**

We will not offer, promise, authorize or give bribes. We will not ask for or agree to accept bribes. Business hospitality offered to others shall comply with all applicable laws and company policies.

We will not give or offer anything of value as an unlawful inducement to purchase, lease, use or recommend the purchase, lease or usage of our products or services. Our interactions with customers will not violate any law, but comply with applicable professional or industrial codes. The prohibition shall extend not only to direct bribery behaviour to clients, but also to any form of bribery behaviour through consultants or other third parties.

We will strictly manage the usage of gifts or hospitality (such as meals, travel and entertainment) to ensure that they do not violate the laws, company policies and industrial or professional codes. Gifts and hospitality, such as meals and entertainment, whenever permitted, shall be of appropriate value and related to legitimate business purposes (e.g. product description, product sale or training), be capable to save time, focused on the current business, and be conducted in an environment conducive to the exchange of relevant information.

Gifts accepted by employees from partners or intended partners for work purposes can only be symbolic or commemorative. Gifts of cash value shall be registered by the recipient with the Administration Department, be disposed by the head of the department to which they were surrendered, and handled by the Administration Department in a unified manner; JA Solar prohibits the solicitation of any gifts or the acceptance of valuable or cash equivalents.

■ **Whistle-blowing of Violations**

Both JA Solar and its employees and managers shall abide by this Code of Conduct. JA Solar has established

special procedures to encourage employees to report suspected violations of the law or this Code of Conduct. JA Solar will never tolerate retaliation against any employees who report violations. It is impossible to consider every possible situation in the business course of JA Solar in this Code of Conduct. Please consult your head if you have any doubt or concern or encounter any situation not mentioned herein.

If an employee suspects any violation of the law, breach of the Code of Conduct or any other violations, he or she may report it to his or her department head or to the Audit & Supervision Committee through the following channels. External stakeholders can also report any violation in the cooperation through the following channels:

- JA Solar SpeakUp Line: <https://jasolar.speakup.report/wb>
- Whistle-blowing Hotline: 010-63611911
- Whistle-blowing Email: antifraud@jasolar.com
- Whistle-blowing QQ: 3476840246
- Whistle-blowing WeChat: Public Account lianJieJA
- Whistle-blowing Address: Building 8, Nord Center, Fengtai District, Beijing - JA Solar Audit & Supervision Committee (Attn.)

JA Solar encourages real-name reporting to facilitate investigation and communication, and prohibits punishment for reporting any suspicious violation and retaliation against anyone who blows the whistle on violations. All reports of suspected violations will be taken seriously and, if necessary, will be promptly and formally investigated by JA. Unless otherwise required by law and the investigation can be carried out, the identity of the informant and whistle-blowing facts will be kept confidential. If you do not provide your name, JA Solar's ability to investigate and follow up the reported matters may be limited by the fact that no further details can be obtained from you.

Any department head who receives a report of a suspected violation must immediately submit it to the Internal Audit Department or the Executive President for follow-up and investigation. The Internal Audit Department or Executive President may assign this responsibility to any manager.

V. Remarks

It is not a contract or a guarantee of continued employment. The company reserves the right to modify, change, or alter any section of the Code of Conduct at any time, as needed. Significant changes to this Code of Conduct will be communicated broadly to employees and disclosed on the company's website.

JA Solar Technology Co., Ltd.

August 2024