



**Trina Solar Co., Ltd**

# **2024 Responsible Minerals Report**

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**Scope of the report:** Consistent with the scope of the company's 2024 sustainability report



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## 1. Committed to responsible mineral procurement

As an important player in the global photovoltaic manufacturing industry chain, we are deeply aware that in the process of producing photovoltaic modules, energy storage systems and other products, the raw materials and components used (such as welding tapes, conductive pastes, electronic components, etc.) may contain tin, tantalum, tungsten, gold (collectively referred to as "3TG"), cobalt and other metals, as well as silicon, Natural mica. We understand that the procurement of these minerals carries potential human rights, environmental and regional conflict risks.

The Company maintains a zero-tolerance approach to any transactions involving minerals (including silicon materials) in conflict-affected and high-risk areas. We are committed to a responsible [mineral sourcing policy](#), continuously conducting responsible mineral due diligence on our supply chain, and are committed to ensuring that all metal materials used in our products are sourced from socially and environmentally responsible sourcing channels.

We are committed to conducting all our operations responsibly and to holding our supply chain partners to the same standard of compliance with their obligations in terms of environmental protection, social responsibility and human rights protection by establishing strict supplier supervision procedures. We resolutely eliminate any direct or indirect activities that directly or indirectly contribute to armed conflict, human rights violations, or environmental damage, ensuring that the value chain of the photovoltaic clean energy industry aligns with the global vision of sustainable development.

## 2. Build a responsible mineral supply chain

As a core enterprise in the global photovoltaic manufacturing field, the company deeply recognizes the important efforts of international regulators, industry organizations and partners in promoting the sustainable development of the mineral supply chain. The concept and requirements of responsible procurement are deeply rooted in the Group's ESG management system. In response to the higher environmental and social responsibility requirements of the global clean energy industry, the company has taken the initiative to establish a responsible mineral procurement system and actively participated in industry collaboration to achieve common goals.

In our responsible mineral management practices, we strictly refer to internationally recognized standards and integrate the following conventions and initiatives into the management and control of the entire value chain of photovoltaic products.

- Responsible Business Alliance (RBA): Responsible Minerals Initiative (RMI)
- U.S. Securities and Exchange Commission (SEC): Section 1502 of the Dodd-Frank Act
- EU: Conflict Minerals Regulation (EU2017/821)
- OECD: Due Diligence Guidelines for Mineral Supply Chains in Conflict-Affected and High-Risk Areas
- China Chamber of Commerce for Import and Export of Minmetals and Chemicals (CCCCMC): Guidelines for Social Responsibility of China's Foreign Mining Investment Industry

We have set a Responsible Minerals goal: 100% of our products are not sourced or supported for the use of

minerals in conflict-affected and high-risk areas. 100% of the 3TG contained in the product is traceable to the country of origin.

We are committed to ensuring that the 3TG and silicon used in photovoltaic modules and energy storage systems come from responsible sourcing channels that comply with environmental justice and human rights protection by strengthening the traceability management of junction boxes, soldering tapes, and silicon materials.

### **3. Carry out responsible mineral management**

#### **3.1 Professional management and execution team**

Under the supervision and guidance of the Board of Directors, the company is managed by the ESG Management Committee, which cooperates with various organizations, departments, and supply chain partners to promote responsible mineral management, and promotes the concept and practice of responsible mineral management to direct suppliers and even the entire value chain.

Supply chain compliance and responsible mineral management are one of the company's ESG issues. The company has established a working group on responsible mineral management, which includes the supply chain management department, procurement department, legal department, risk management department, technical engineering center and Academia Sinica, and is responsible for coordinating the implementation of the responsible mineral management methods described in the specification.

The Responsible Minerals Management Working Group is responsible for implementing responsible minerals management systems and processes in collaboration with relevant parties, including the implementation of supply chain due diligence and risk identification and mitigation. The supply chain management department is responsible for the implementation of the management plan and the monitoring of progress.

#### **3.2 Continuously optimize management policies and processes**

The company has detailed planning and implementation of responsible mineral management procedures with reference to the framework of the Organization for Economic Co-operation and Development (OECD) guidelines. Since 2015, the company has established a management system and procedures for conflict minerals. The Company has issued the Responsible Minerals Management Policy to promote the implementation of the Responsible Minerals Management. The system clearly lists the roles and responsibilities of management and relevant departments, and clarifies the procurement requirements and due diligence procedures for conflict minerals suppliers. The Company identifies and manages minerals in conflict-affected and high-risk areas through the following processes:

**Step1 Determine the products and suppliers within the scope:** Review the product bill of materials to identify the products containing 3TG and its suppliers;

**Step2 Perform Responsible Country of Origin Inquiry (RCOI):** Suppliers fill in the "Conflict Minerals Reporting Template" (CMRT), and each business unit of the company identifies the origin of 3TG according to the feedback from suppliers, and uses the risk control matrix to divide suppliers into three types of high/medium/low risk suppliers;

**Step3 Perform due diligence:** Each business unit of the company conducts due diligence on high-risk suppliers;

**Step4 RCOI and due diligence archiving:** Each business unit of the company uploads the annual RCOI results and due diligence reports to the supplier management system (SRM) system for confirmation.

**Step5 Continuous process improvement:** Pay attention to policy changes related to minerals in conflict-affected and high-risk areas, pay attention to the RMI official website, and update the CMRT to the latest version. Sort out and review all links, and continuously improve and improve the conflict minerals management process.

The company regularly revises and improves relevant systems and processes to ensure that minerals in conflict-affected and high-risk areas are traceable and traceable, with a revision cycle of no more than 2 years.

### **3. 3 The whole process traceability electronic platform**

The company comprehensively upgrades the supply chain management system, carries out supply chain due diligence through the integrated traceability system and SRM system, integrates due diligence results, traceability material information and other data, and builds an SRM system supply chain map covering 100% of bill of materials (BOM) materials, and realizes key materials (silicon-containing materials) and conflicting chemical elements through the traceability system. The management of materials realizes the all-round optimization of supply chain management.

The company has set management goals such as the traceability completion rate of key materials of core suppliers, and plans to achieve 100% traceability coverage of major raw materials within three years, and will continue to track the achievement of the target in the next year.

### **3. 4 Support and cooperate with suppliers closely**

In order to further ensure supply chain compliance, the company requires its suppliers to sign the "Commitment to Non-Use of Conflict Minerals" to commit to and comply with the company's policies and requirements on responsible minerals, and strengthen the management and responsibility traceability of suppliers.

The company gives full play to the role of the "chain master" of the supply chain, maintains in-depth collaboration with suppliers, conveys responsible concepts, requirements and experience to suppliers through business communication, audit and evaluation, supervision and rectification and exchange training, and constantly communicates with suppliers and understands their expectations, and continues to provide support and capacity building to promote the responsible management of the supply chain. The Company actively responds to the Responsible Minerals Initiative (RMI) program by eliminating mineral sourcing risks in conflict-affected and high-risk areas in accordance with the program's tools and guidance documents.

The company entrusts professional institutions to carry out ESG-related training for suppliers, covering responsible mineral management, responsible procurement, supplier due diligence, etc., and the trained suppliers account for 98% of the core suppliers, and more than 300 people participate in the training feedback.

The company requires all relevant suppliers to ensure that materials are sourced from environmentally and socially responsible sources.

### 3.5 Smooth grievance mechanism

We welcome the attention of stakeholders and humbly accept feedback from internal employees, suppliers, industry partners and the public on any concerns, clues or suggestions for improvement on mineral procurement issues involved in our supply chain through open channels.

Stakeholders are welcome to Submit concerns about mineral procurement to [supplychain.strategy@trinasolar.com](mailto:supplychain.strategy@trinasolar.com).

Reporters can submit information anonymously, and the company will take the highest level of confidentiality measures to protect the rights and interests of whistleblowers. Ensure that issues are substantively resolved and that progress is provided to stakeholders through appropriate channels.

### 3.6 Risk identification and assessment of supply chains

#### 3.6.1 Risk identification

Companies have a robust process in place to identify risks in their supply chains.

##### **CAHRAs identification tool**

Referring to the risks in the company's supply chain policy, the company has developed procedures for identifying CAHRAs in accordance with the OECD Responsible Supply Chain Due Diligence Guidelines for Minerals from Conflict-Affected and High-Risk Areas and the SSI ESG Standard. The process includes the resources used, the criteria for identifying "conflict-affected and high-risk" areas, and the frequency of our review decisions. Companies use the following resources to identify CAHRAs:

- (1) Heidelberg's "Global Conflict Barometer";
- (2) the Dodd-Frank Act;
- (3) EU CAHRA list;
- (4) UN sanctions list;
- (5) Global Corruption Perception Index;
- (6) Fragile State Index;
- (7) Whether there are social responsibility reports such as SA8000/ISO26000/BSCI/Sedex and no serious human rights issues, such as child labor and forced labor.

##### **Other:**

- (1) The company requires suppliers to cooperate in providing origin information and ensuring that they can understand the source of transactions, transportation routes, and the name and location of direct suppliers.
- (2) The Company reviews all information collected against CAHRAs, sanctions lists, local laws and internal procurement requirements.
- (3) No complaints from relevant parties (affected persons or whistleblowers) were received during the time period covered by this report.

#### 3.6.2 Risk assessment (high-risk procurement only)

For raw materials and supply chains identified as "high risk", the company conducts enhanced due diligence. This includes:

- (1) Assess the context of CAHRAs;
- (2) Clarify the chain of custody;
- (3) Evaluate the activities and relationships of upstream suppliers;
- (4) Identification of mineral origin information;
- (5) Conduct on-site risk assessment.

The company identifies the raw material and mineral chemical elements of products by relevant professional departments such as R&D, and tracks, screens and identifies suppliers through key materials. The Company adopts RCOI procedures to conduct reasonable and appropriate traceability and investigation of the origin of minerals used in products to assess and control potential risks of mineral materials.

The company conducts strict evaluation and screening of suppliers at the access stage to reduce the risks related to conflict minerals from the source. The company conducts risk assessments on suppliers, and adopts rectification solutions or conducts on-site due diligence for suppliers with high, medium and low ESG risks according to the risk assessment level. Direct suppliers are responsible for managing changes (including additions or removals) of smelter or refinery (SORs) information in their upstream supply chains and shall promptly report to the Company in case any change happen to the Conflict Minerals Reporting Template (CMRT) or any non-conformity would arise against Conflict Minerals Data Exchange Standard.

In 2024, the company comprehensively identify products containing 3TG and silicon and in the mass production stage, sort out the direct suppliers related to the mineral value chain, and establish a list of responsible mineral management suppliers if high-risk suppliers are found. Records related to responsible mineral due diligence will be archived for at least 10 years.

The Company does not purchase or source raw materials or refined minerals directly from smelters or refineries, but the Company understands the importance of third-party conflict-free certification at the upstream smelter or refinery level for downstream companies. During the reporting period, the company identified that there were 18 direct suppliers involved in the tin ore business with a focus on minerals (tin) in the production materials, and the company required them to declare SORs for 3TG mineral-related materials in accordance with the CMRT. 100% of these direct suppliers responded with completed CMRT questionnaire.

The 18 direct suppliers involved in the tin mining business all traced the origin of the mineral (tin) value chain and identified 4 SORs, all of which provided 100% RMAP certified materials, all of which were made in China. The Company compares the obtained RMAP-certified materials against RMI's known list of qualified smelters/refineries to verify that the smelter/refinery and country of origin involve conflict minerals. All verified smelters/refineries are qualified smelters/refineries by RMI.

The company comprehensively upgrades the supply chain management system, carries out supply chain due diligence through systematic traceability system and SRM system, integrates due diligence results, traceability material information and other data, and builds an SRM system supply chain map covering 100% of bill of materials (BOM) materials. The management of chemical elements and materials realizes the all-round optimization of supply chain management. The company has set management goals such as the traceability completion rate of key materials of core suppliers, and plans to achieve 100% traceability coverage of major raw materials within three years, and will continue to track the achievement of the target in the coming years.

The company identified 0 high-risk areas for silicon chains, and the origin of the silicon materials used did not involve conflict-affected or high-risk areas.

The company regularly reviews the supplier material acquisition and due diligence process, and communicates directly with relevant suppliers about the non-conformities identified in the process, and requires them to take corrective actions.

### **3.7 Risk mitigation and management measures**

For suppliers found to be involved in high-risk SORs in the upstream supply chain, the company will issue a non-conformity notice and conduct further investigations, urging them to take risk mitigation measures. At the same time, related products and materials involving high-risk SORs will be treated as non-conforming products. The Company will conduct separate assessment of the risk mitigation measures submitted by direct suppliers to ensure that the mitigation measures are implemented truthfully.

In addition, the company identifies and reviews the risks of suppliers in the four dimensions of environment, society, business ethics and material traceability (including responsible mineral management as one of the key criteria).

As of the end of the reporting period, the company identified 0 high-risk suppliers, and 0 suppliers canceled cooperation due to mineral sourced in conflict-affected and high-risk areas; The Company uses 0 minerals from conflict-affected and high-risk areas and generates 0 in revenue from minerals of conflict-affected and high-risk areas.

### **3.8 Due diligence and reporting**

The company highly recognizes the importance of due diligence in the supply chain, annual due diligence with raw material traceability audits are conducted on core suppliers and medium- and high-risk suppliers of responsible minerals.

The company actively promotes the implementation of the supply chain due diligence system, dynamically adjusts the supply chain and supplier management objectives according to business needs and overseas policies, classifies the main and auxiliary material suppliers of each business unit, screens core and key material suppliers, assesses risks around ESG core content and initiates due diligence.

The company selects 25 employees from relevant departments to form a professional due diligence team and delivered training to them with certification awarded to persons passed the assessment. Incentive measures are also taken to keep the audit team highly motivated.

We have established a sound information disclosure mechanism to summarize and disclose the progress and results of responsible mineral due diligence projects through the annual sustainability report.

Through transparent disclosure, the Company aims to strengthen engagement with stakeholders and continuously improve its conflict minerals management capabilities.



The Company does not maintain direct relationship with upstream SORs. All direct suppliers are required to provide a list of upstream SORs obtained through supply chain due diligence. These lists are compared against the RMAP conformant SOR list and lists published by other external organizations to assess whether they have been verified as conflict-free.

#### **Fourth, continue to promote and resolutely implement**

The Company will continue to collaborate with direct suppliers to support high-risk SORs in obtaining RMAP certification, thereby strengthening their Conflict Minerals management capabilities and further mitigating risks along the minerals value chain. To enhance supplier awareness and compliance, the Company will provide additional training and communication on Conflict Minerals-related requirements.

Looking ahead, the Company intends to improve the accuracy of due diligence data, enhance the completeness of supplier information management, and strengthen the timeliness of data collection. Further enhancements will be made to verify the information provided by supplier in due diligence and to integrate this process into the overall supplier evaluation framework.

The Company remains committed to maintaining a 100% response rate to the Conflict Minerals Reporting Template (CMRT) and will continue promoting 100% signing of the *Non-use of Conflict Minerals Commitment* among its suppliers. Conflict Minerals' due diligence will continue to be conducted to a high standard to eliminate both human rights and environmental abuses in the minerals supply chain and to fulfill its commitment to responsible minerals sourcing.