



Trina Solar Co., Ltd

Global Human Rights Principles

Leading Dep.: ESG Management

Supportive Dep.: EHS、 Legal、 HR

Approval: EMT

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1. Purpose

Trinasolar regularly assesses human rights related risks and potential impacts. We conduct periodic reviews of the global human rights principles, and update our policies, regulations, and procedures accordingly, so as to drive for continuous improvement for human rights performance.

2. Scope

This policy, as part of our management framework, applies to Trinasolar and all of its wholly-owned and non-wholly-owned subsidiaries, as well as branches (hereinafter collectively referred to as the “Company”). It covers all business activities and operations, including R&D, production, construction, operation, sales, investment and financing, and mergers and acquisitions. We engage and require our suppliers, contractors, partners and other relevant parties to adhere to the principles embodied in this policy and to develop and implement similar policies.

3. Our commitments

Human rights are inherent to all people, regardless of nationality, sex, national or ethnic origin, color, religion, language or any other status. These rights range from the most fundamental—the right to life—to those that make life worth living, such as the rights to food, education, work, and health. Trinasolar is committed to respecting human rights by ensuring a safe working environment, providing fair compensation, and addressing both the physical and mental well-being of our employees. We also respect the human rights of all our stakeholders—including employees, customers, suppliers, communities, and other relevant stakeholder, and industry associations—by maintaining open and effective communication, and by responding to their concerns and needs. We pledge to uphold internationally recognized human rights principles throughout our operations and value chain, including Universal Declaration of Human Rights, the 10 Principles of the United Nations Global Compact (UNGC), UN Guiding Principles on Business and Human Rights, International Bill of Human Rights, International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and the applicable laws in the jurisdictions in which we operate. We are committed to incorporating these universal human rights principles into our strategies, policies and procedures, and establishing a culture of integrity, so as to set up a stage for our long-term success.

Trinasolar has established an integrated management system to oversee human rights across its businesses. We are committed to maintaining and improving the management system to avoid any potential risks of human rights violations. We apply the following policies, regulations, and procedures to comply with the global human rights principles and to prevent any potential infringements of human rights resulting from our activities, products, or any activities in our value chain:

- Employee Handbook
- Environment, Occupational Health & Safety (EHS) and Energy Management Policy
- Product Stewardship Policy
- Code of Business Conduct and Ethics
- CSR Code of Conduct of Trina Solar Supplier
- Supply Chain Due Diligence Manual and Supplier ESG commitment
- Responsible Mineral Management Policy
- Conflict-Affected and High-Risk Areas Management Procedure

- EHS Management System Internal Audit Management Procedure
- Whistleblowing Policy
- Stakeholder Engagement and Management Policy

4. Our Principles

People are at the heart of Trinasolar's success. We are committed to providing a decent workplace for all employees. We also expect our suppliers, contractors, and partners to comply with all applicable laws and international standards concerning human rights and labor practices. This commitment is supported through robust supply chain management and due diligence processes. We believe in integrity and responsibility in our actions. We pledge to conduct our business in such ways that meet the universal requirements in the areas of Environment, Social and Governance (ESG) responsibilities. Trinasolar sets up the following global human rights principles to express its commitment to global human rights:

- a) Prevention of Human Trafficking, Forced Labor, and Child Labor:** Trinasolar will not use or tolerate the use of forced, debt bonded, indentured labor, involuntary prison labor, slavery, or human trafficking in its business or value chain. We continuously keep vigilant in our commitment to safeguard workers' rights in global supply chains. We prohibit harsh or inhumane treatment, including corporal punishment, threats of violence, confiscation of identity documents, requirements to provide deposits or financial guarantees, restrictions on personal freedom and movement during recruitment or employment, or other similar means. Trinasolar will not use child labor and has implemented measures to prevent its occurrence. To that end, we have established mechanisms to identify, address and remediate instances of child labor. Workers under the age of 18 are not allowed to perform any hazardous work or engage in work that is unsuitable for their personal development and well-being.
- b) Working Hours, Wages and Benefits, and Labor Rights Protection:** Trinasolar strictly complies with the laws and regulations of the jurisdictions in which it operates regarding maximum working hours, overtime and the minimum rest periods, ensuring that employees are entitled to at least one day of rest in each seven-day period. We have established internal limits on working hours to ensure that employees' working hours do not exceed applicable legal requirements and internationally recognized standards, thereby preventing excessive overtime. Trinasolar pays employee compensation which meets, as minimum, or exceeds the requirements of applicable laws, including those related to minimum wages, overtimes, and legally mandated benefits. To determine appropriate wage levels, we benchmark against living wage standards and assess local living costs (covering essential expenses such as food, housing, healthcare, education, and transportation) so that employees and their families can maintain a dignified standard of living. We provide all employees with statutory leave entitlements in accordance with applicable laws, including public holidays, paid annual leave, maternity leave, parental leave, and sick leave, while enhancing social insurance coverage including endowment, medical, unemployment, work-related injury, and maternity insurance, as well as public housing funds and supplementary commercial insurance.
- c) Responsibility in Supply Chain:** As set out in CSR Code of Conduct of Trina Solar Supplier, Supply Chain Due Diligence Manual and Responsible Mineral Management Policy, Trinasolar integrates human rights requirements into supplier onboarding, day-to-day management, performance assessment and exit mechanisms. Our agreements with suppliers include Supplier ESG Commitment, Commitment Letter on Lawful Employment, and Statement of Commitment on Non-Use of Conflict

Minerals, which incorporate requirements prohibiting forced labor, child labor, discrimination, and unfair treatment as well as requirements for responsible minerals. These agreements require suppliers to establish and maintain fair employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and regulations and to extend these requirements to their own upstream partners. Trinasolar communicates these human rights principles to suppliers and their upstream partners through supply chain due diligence management. We conduct regular trainings and ESG audits of suppliers to promote enhanced management practices and ensure compliance with our labor and human rights requirements. Trinasolar places a high priority on responsible minerals, including those specifically listed in applicable laws such as the EU Batteries Regulation, implementing a traceability system for materials. In collaboration with our suppliers, we apply responsible sourcing practices to reject minerals that are mined through human rights abuses, environmental destruction, or violence, thereby promoting sustainable development.

- d) **Environmental Stewardship:** Trinasolar adopts a precautionary approach to the materials used in our products. We strive to conserve energy, water and other natural resources, and work to reduce the environmental impact of waste generation and emissions to air, water, and land, while giving due consideration to ecological protection and the rights of communities and indigenous peoples. We are committed to ensuring that ecological development and project construction do not infringe upon the rights and interests of local communities to live and develop sustainably. Our commitment to environmental stewardship is reflected in Trinasolar's Environment, Occupational Health & Safety (EHS), Biodiversity Conservation Policy, Climate Change Policy and Energy Management policy. Trinasolar continuously keeps vigilant in its commitment to safeguard environmental stewardship in its global supply chain.
- e) **Workplace Safety and Health:** Trinasolar is committed to providing a healthy and safe workplace for its employees, contractors, and the communities in which we operate. We seek to provide a secure business environment by continuously strengthening risk prevention and control, hazard identification and remediation, and emergency response mechanisms to protect our employees, products, materials, equipment, information, the environment, and the communities in which we operate. We strive to comply with all applicable regulatory requirements as a minimum, and implement programs and processes to achieve greater protection, where appropriate.
- f) **Product Liability:** As the range of products and services we offer broadens and changes, we evaluate potential health and safety, environmental and human rights risks associated with our products and business activities. These risks may arise throughout the product life cycle, including R&D, manufacturing, transportation, use and end-of-life product disposal. We have a Product Stewardship Policy in place to ensure product safety and environmental protection throughout the product life cycle.
- g) **Diversity and Nondiscrimination:** Trinasolar values diversity, equity and inclusion in our workforce, as well as in our customers, suppliers, and other stakeholders. We apply a zero-tolerance policy toward all forms of discrimination. We do not discriminate in any aspect of employment, including hiring, compensation, benefits, training and career development. This applies regardless of race, nationality, ethnicity, color, religious belief, gender, age, physical or mental disability, marital status, fertility status, political affiliation, sexual orientation or any other characteristic protected by local law, regulation or ordinance. We provide equal employment opportunity for all applicants and employees, and uphold the principle of equal pay for equal work, regardless of gender. We also provide regular training for employees to foster a diverse and inclusive workplace culture.

- h) **Harassment and Abuse Prohibition:** All Trinasolar employees are expected to treat colleagues, customers, suppliers, contractors, agents and any other stakeholder with dignity and respect. We are committed to maintaining a workplace free of harassment and abuse. We do not tolerate any form of harassment, violence or abuse, including but not limited to verbal abuse, physical abuse, visual abuse, sexual harassment or any other form of misconduct. We have established a closed-loop mechanism for the reporting, investigation, handling and accountability of harassment and abuse incidents. Substantiated incidents will be subject to disciplinary action in line with the procedures outlined in the Employee Handbook. We provide awareness training for all employees to inform them of methods to protect their rights. We also require our partners to implement equivalent standards in promoting diversity, non-discrimination, and the prohibition of harassment and abuse in their own operations.
- i) **Freedom of Association and Collective Bargaining:** Freedom of Association is the right of workers to freely form and join workers' organizations such as labor union, and worker committee for the promotion and defense of occupational interests. Collective bargaining is the negotiation of wages and other conditions of employment by an organized body of employees. Trinasolar respects employees' rights to freely assemble, join unions, and engage in collective bargaining in accordance with local laws. We are committed to treating our employees with dignity and respect and striving to create an environment of open communication where employees can freely speak with their managers about their ideas, concerns or problems. We engage in regular dialogue with employee representatives and union members to discuss working conditions and maintain transparent communication. We encourage open communication among employees, enabling them to share their thoughts, concerns, and suggestions. Where freedom of association and the right to collective bargaining are restricted by applicable laws and regulations, employees shall be permitted to elect and join other lawful forms of employee representative organizations.
- j) **Privacy and Freedom of Expression:** We respect and protect the personal information and privacy rights of our employees, customers, suppliers, and local communities. We implement controls throughout the personal information life cycle, including its collection, storage, use, disclosure and destruction, and prohibit any unauthorized access to, use, deletion, modification or disclosure of personal information. Freedom of expression is fundamental to diverse cultural expression, creativity and innovation as well as the development of one's personality through self-expression. Trinasolar safeguards the freedom of stakeholders to express their legitimate concerns and provides grievance mechanisms and multiple accessible channels for feedback and complaints, encouraging all stakeholders to put forward reasonable suggestions.
- k) **Equal Opportunity:** We value equal opportunity and pay particular attention to the needs of vulnerable groups and employees who may be affected by the climate transition. We take appropriate measures, including skills training, employment opportunities, and reasonable support or accommodations, to remove barriers to equal participation and development and safeguard their rights and interests.

5. Management Initiatives

Trinasolar integrates human rights considerations—including but not limited to forced labor, human trafficking, child labor, freedom of association, diversity and non-discrimination, and collective bargaining—

into its corporate risk assessment and management system. We have established a human rights due diligence mechanism comprising “risk identification – assessment and prioritization – monitoring and remediation – management enhancement”, covering our own operations, value chain and new business relationships (mergers, acquisitions, joint ventures, etc.). We continuously enhance our preventive frameworks to improve the control of human rights-related risks. We conduct regular internal audits and due diligence across our operations and business partners to identify, assess, and address human rights risks and potential impacts throughout our value chain and new business relationships. Targeted mitigation and remediation actions are implemented where needed.

a) Risk Identification

We conduct annual human rights risk assessments based on factors such as industry, geographic location, and business model. Risk data is collected through multiple channels, including internal audits, public sources, industry research, and stakeholder feedback from i.a. employees, local communities, or non-governmental organizations. We prioritize risks that may affect vulnerable groups, including our direct employees, third-party employees, women, migrant workers, minors, and local communities, ensuring a comprehensive and inclusive assessment process. We regularly review our human rights risk mapping to ensure the identified risks remain current and relevant.

b) Inspections and Due Diligence

Following risk identification, we carry out inspections and due diligence using a range of methods including questionnaires, document reviews, interviews, and on-site investigations. Within our own operations, annual internal audits are conducted in line with our ESG Management System, complemented by internal and third-party audits at our production facilities. For business partners, supplier due diligence is carried out according to our Supply Chain Due Diligence Manual to manage supplier performance, which covers all relevant human rights areas. If human rights risks are identified, we document them in our reporting systems, implement corrective measures, and carry out ongoing monitoring to ensure improvements are sustained.

c) Mitigation and Remediation Measures

For any identified actual or potential human rights risks, we take proactive steps to prevent or reduce adverse impacts and provide remedies when harm has occurred. We have established remediation mechanisms, prioritizing mitigation actions based on risk severity, and implement appropriate remedial measures. Support for affected individuals may include financial compensation, medical care, psychological counselling, educational assistance, and the restoration of rights. We also regularly review and adjust related management practices to ensure that remedies directly address the needs of impacted individuals or communities.

In collaboration with our partners, we have developed a joint human rights remediation framework to collectively prevent, investigate, and resolve human rights issues, as well as to ensure ongoing monitoring. Partner performance in human rights and the effectiveness of their remedial actions are included in our ESG evaluations. Partners failing to meet required standards may face suspension of cooperation until corrective actions are taken; if such actions are ineffective, the partnership may be terminated.

To prevent future risks, we continuously review and improve our internal systems, processes, and practices. We also enhance human rights training for employees and partners and strengthen early-warning mechanisms for emerging risks.

d) Stakeholder Engagement and Reporting

Trinasolar communicates its human rights initiatives through public platforms such as our official website and annual sustainability reports. We actively seek feedback from stakeholders and address their concerns

as part of our commitment to transparency and continuous improvement.

6. Grievances and Reporting

To gather and address concerns from all parties, Trinasolar has established a grievance and reporting mechanism. Employees, suppliers, business partners, customers, and other stakeholders can provide feedback or report incidents related to human rights violations or concerns through [Trinasolar Reporting Complaints Platform](#). This mechanism covers human rights issues arising not only from Trinasolar's own operations but also from those involving our suppliers and other business partners. We also encourage our partners to clearly communicate access to this mechanism within their own networks, ensuring that affected individuals along the collaborative value chain can effectively report human rights concerns through this shared channel.

Reporting Platform Address: <https://audit.trinasolar.com/#/>

We will contact the complaints and whistleblowers and conduct necessary communications, investigate these reports, and provide timely follow-up feedback. Additionally, we will ensure the confidentiality of the whistleblower's information to protect them from retaliation.

We maintain strict confidentiality of all information related to complainants and whistleblowers to ensure their protection from any form of retaliation. Trinasolar adopts a zero-tolerance policy toward threats, intimidation, harassment, or reprisals against individuals who report concerns in good faith. Any department or employee found engaging in such behavior will be subject to immediate internal investigation and held accountable in accordance with company policies and relevant regulations. In cases where retaliation is identified, we will take prompt action to provide appropriate support to the affected complainant or whistleblower. We also require our business partners to uphold the same commitment and implement equivalent measures to safeguard individuals who raise concerns.

7. Appendix

7.1 Revision record

Doc#	Version	Responsible Person/Dep.	Effective date	Description
TS-EHS-1003	V01	EHS	2022-09-30	New version release
TSL-CM-012	V02	Compliance Management	2024-10-08	Amendment
TSL-CM-012	V03	Compliance Management	2025-10-13	Amendment
TSL-CM-012	V04	ESG Management	2026-09-01	Amendment

7.2 Validity period

This policy is drafted, interpreted and maintained by ESG Management Department and is approved and issued by the Company's Board member and senior management. It takes effect from the date of issuance and remains valid for a period of two years. The Company will review and update the policy periodically, as necessary, to ensure its continued relevance and effectiveness.

The development and revision of this policy are guided by the principles of transparency and inclusivity.

Stakeholders with questions, suggestions, or comments regarding its content are encouraged to contact us at: ESG@trinasolar.com.

8. Attachment

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