

# Responsible Mineral Management Policy

Trina Solar Co., Ltd. (hereinafter referred to as "Trinasolar"), as the world's leading provider of photovoltaic smart energy solutions, has always been committed to "benefiting all mankind with solar energy" and actively promoting sustainable development in the clean energy field, and practicing ethical sourcing is a key support for achieving this mission. In order to standardize the compliance and responsible procurement process of the company's mineral supply chain, accurately identify, effectively prevent, reasonably reduce and completely eliminate risks that may contribute to regional conflicts, serious human rights violations, violations of business ethics and other adverse effects in mineral procurement, and meet the diversified needs of customers and the long-term sustainable development goals of Trinasolar's business, Trinasolar hereby publishes this Responsible Mineral Procurement Management Policy.

This policy is generated based on the company's human rights policy framework and is a specific implementation guideline for regulating the management of mineral procurement. It applies to Trinasolar, its holding subsidiaries, branches and other domestic and foreign branches. We are committed to establishing and implementing a responsible mineral management system in the supply chain in accordance with relevant laws, regulations and industry standards such as the 2nd edition of the China Responsible Minerals Supply Chain Stewardship Guidelines, the OECD Due Diligence Guidance for Responsible supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd Edition) (hereinafter referred to as the OECD Guidelines), Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and the Regulation (EU) 2017/821 Conflict Minerals Regulation.

As a core principle of responsible mineral management, the Company is committed not to procure or use minerals that directly or indirectly finance armed groups in conflict-affected and high-risk areas, or that contribute to regional conflicts and human rights violations. The scope of this policy covers minerals such as tungsten, tin, tantalum, gold, cobalt, mica, and silicon in the supply chain of Trinasolar, its subsidiaries and holding companies. At the same time, we require all

our suppliers to uphold the same responsibility and jointly implement the due diligence requirements, which Trinasolar will explicitly incorporate in the terms of contracts and /or agreements with suppliers.

In line with the above principles, Trinasolar is committed to implementing the following responsible mineral management systems:

**1. Comply with applicable laws, regulations and standards:** Strictly abide by international norms, domestic laws and regulations and industry standards related to mineral supply chain compliance in the countries and regions where the business operates to ensure legal compliance throughout the procurement activities.

**2. Clarify management responsibilities and organizational structure:** Responsible mineral management in the supply chain is an important part of the company's sustainable development strategy, under the overall guide from the ESG Management Committee, the Supply Chain Strategy Department takes the lead in promoting relevant planning and business coordination, and with the coordinated support of Compliance Management, Quality Management, R&D and other relevant departments, the Procurement Department is responsible for taking specific measures to supplier to ensure the effective implementation of this policy.

**3. Carry out supply chain due diligence management**

Suppliers who supply mineral products covered by this policy are required to sign a "Non-use of conflict minerals commitment" in which responsible mineral sourcing requirements are specified.

We carry out mineral supply chain due diligence annually, risk levels are classified according to the outcome of due diligence. For high-risk suppliers, a specific corrective action plan will be made. In case the risk cannot be effectively mitigated through corrective action or the suppliers refuse to take corrective action, alternative supply sources will be arranged in time to ensure supply chain safety and compliance.

Based on the outcome of supply chain due diligence and with reference to Appendix II of the OECD Guidelines, Trinasolar has made the following commitments in terms of risk management in

the mineral supply chain:

1. Prohibition of Related Serious Infringement: Trinasolar will not tolerate, profit, help, assist or facilitate any party to carry out the following acts when conducting procurement or business activities in conflict-affected and high-risk areas:

- 1) the worst forms of child labour (as defined in section III of the World Labour Organization's 1999 Convention on the Worst Forms of Child Labour (No. 182), including situations where "the nature of the work or the working environment may be harmful to the health, safety or morals of the child");

2. Torture, cruelty, inhuman and degrading treatment of any kind;

- 1) Any form of forced or compulsory labor (i.e., threatening punishment to force individuals to perform labor or services involuntarily);

- 2) other serious violations of human rights, such as widespread sexual violence;

- 3) war crimes, serious violations of international humanitarian law, crimes against humanity or genocide;

- 4) Other mineral products in areas that non-conformity with the "conflict-free norm", such as mineral raw materials that have been recognized by the United Nations Security Council as human rights violations and environmental degradation caused by mining in the Democratic Republic of the Congo, or minerals produced in the Congo veins such as Rwanda and Uganda.

If Trinasolar has reasonable grounds to determine that an upstream supplier is at risk of procuring from, or being associated with, an entity that commits such serious infringement, it will immediately suspend or terminate cooperation with such upstream supplier and initiate an alternative source of supply screening process.

3. Prohibition of direct or indirect support for non-state armed groups: Trinasolar strictly prohibits providing direct or indirect support to non-state armed groups through mineral extraction, transportation, trading, processing, or export. Such "support" includes, but is not limited to, the purchase of, payment, or provision of logistical support, equipment, etc. from non-state armed groups or their affiliates. Among them, non-state armed groups or their

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affiliates must meet any of the following characteristics:

- 1) Illegal control of mining areas, or control of transportation routes, mineral trading places and upstream entities of the supply chain;
- 2) Illegally levy taxes or extort money and natural resources at the entrance of the mining area, along the road leading to the mining area, or at the mineral trading site;
- 3) Illegal taxation or extortion of intermediaries, exporters or international traders.

If Trinasolar has reasonable grounds to determine that there is a risk of procurement from, or association with, an entity that provides direct or indirect support to non-state armed groups, Trinasolar will immediately suspend or terminate cooperation with such supplier and initiate an alternative source of supply screening process.

#### 4. Regulate cooperation in public or private security forces

- 1) Trinasolar will manage the risk of cooperation between public or private security forces in accordance with the following provisions: Eliminate direct or indirect support to public or private security forces that illegally control mine sites, transportation routes, and upstream supply chains, illegally collect taxes or solicit money or minerals at the entrance of mine sites, along transportation routes, or mineral trading points, or illegally collect taxes or extort from intermediaries, exporters, or international traders.
- 2) Trinasolar has made it clear that the core responsibility of public or private security forces at the mine site and surrounding areas and along transportation roads should be to maintain the rule of law, including protecting human rights, protecting the safety of miners and equipment and facilities, and ensuring that legal mining and trade activities are not interfered with.
- 3) If Trinasolar or a partner company in the supply chain signs a cooperation contract with public or private security forces, it must clearly require the partner to comply with the Voluntary Principles on Security and Human Rights; At the same time, Trinasolar will support or take measures to implement screening policies to ensure that individuals or security armed units with known serious human rights violations are not hired.
- 4) Trinasolar will support or take measures to work with central and local governments,

international organizations and civil society organizations to explore feasible solutions to improve the "transparency, proportionality and accountability" of public safety and security costs.

5) Trinasolar will support or take measures to cooperate with local governments, international organizations and civil society organizations to actively avoid or minimize the negative impact of public/private security forces stationed at mine sites on vulnerable groups (especially small-scale workshop miners) (if the supply chain minerals come from small-scale workshops or small-scale mining).

If Trinasolar identifies the above risks, it will immediately formulate and implement risk management plans for upstream suppliers and relevant stakeholders to contain or mitigate risks based on the company's specific positioning in the supply chain. If the risk management plan has not taken effect after six months of implementation, cooperation with upstream suppliers will be suspended. If a risk of violation of this article is identified, the same measures will be taken.

5. Prohibition of bribery and fraud of origin: Trinasolar will not directly or indirectly propose, promise, or carry out bribery, and resolutely resist solicitation of bribes; We will not pay bribes to cover up or falsify the origin of mineral resources, and falsely report the taxes, fees, and concession fees payable to the government for activities such as mineral resource exploitation, trade, processing, transportation, and export.
6. Preventing money laundering risks: Trinasolar will support or take measures to help eliminate money laundering if Trina has reasonable grounds to determine that there is a "money laundering risk arising from or related to the illegal taxation or extortion of minerals obtained at mining site entrances, along transportation routes, and at the mineral trading sites of upstream suppliers."
7. Regarding taxes, fees and royalties paid to governments: Trinasolar will ensure that all taxes, fees and royalties related to the mining, trade and export of ores in conflict-affected and high-risk areas are paid to the government and are committed to disclosing such payments in accordance with the principles of the Extractive Industries Transparency Initiative (EITI) based on the company's position in the supply chain.
8. Strengthen special risk management: Trinasolar takes significant measures within a reasonable

time to prevent or mitigate risks related to bribery, fraud at origin, money laundering and government payments, and track risk mitigation progress in collaboration with suppliers, central and local government agencies, international organizations, civil society and affected third parties, based on the company's specific positioning in the supply chain. If risk mitigation measures remain ineffective after six months of implementation, cooperation with upstream suppliers will be suspended or terminated, and alternative source screening processes will be initiated.

9. Ensuring occupational health and safety: In the procurement and production process, Trinasolar will never purchase from entities that "provide a life-threatening occupational environment for direct/indirect employees or production site personnel", nor will it profit, assist, or facilitate the relevant behaviors of such entities. If Trinasolar has reasonable grounds to determine that an upstream supplier has the above problem, or has an association/procurement relationship with the subject with such problem, it will immediately suspend or terminate cooperation with the supplier and initiate an alternative source screening process.
10. Strictly prohibit the use of child labor: In procurement and business activities, Trinasolar will never employ children below the minimum working age stipulated by the laws and regulations of the host country, nor will it profit, assist, or facilitate the employment of such child labor, let alone purchase from or associated with non-compliant entities. If the host country does not have relevant laws and regulations, the minimum working age is uniformly set at 16 years old. Trinasolar will immediately suspend or terminate cooperation with upstream suppliers if they have reasonable grounds to determine that there is a risk of child labor, association with, or procurement of their products by the subject of child labor.

**4. Smelter/refinery management:** Regularly sort out the list of SORs in the supply chain, and verify their mineral sources, industry certification qualifications and other information; If there are reasonable grounds to determine that there is a risk, the company's internal team or authorized third-party will conduct on-site audits accordingly to ensure the compliance of the upstream supply chain.

**5. Enhance supply chain transparency:** Continue to enhance transparency in the mineral supply chain, and regularly disclose key performance indicators for responsible mineral management through annual Sustainability Report accessible to public.

**6. Internal and external communication and enhancement of capability:** Through internal training and external communication, we ensure that all employees and cooperative suppliers fully understand and strictly abide by this policy. In parallel, we assist suppliers in establishing and improving responsible mineral management and supervision mechanisms, and jointly improve the overall risk management capabilities of the mineral supply chain.

**7. Grievance mechanism:** Trinasolar has established convenient and confidential communication and appeal channels to ensure the effective implementation of this policy. Employees, suppliers, partners, customers and other stakeholders may anonymously or publicly complain and report risk concerns related to the mineral supply chain to the compliance or regulatory authorities through the following channels:

- Mailing address: Audit and Supervision Department No. 2 Tianhe Road, Xinbei District, Changzhou City,
- Reporting hotline: 0519-8517 6933 Email: IA@trinasolar.com
- Scan the code to report:



Trinasolar is committed to conducting objective investigations and fair handling of all reported cases in accordance with applicable laws and regulations, and to providing timely feedback to the reporters on the outcomes. Simultaneously, we will strictly protect the lawful rights and interests of both complainants and reporters, ensuring they are not subjected to threats, intimidation, harassment, or any other form of unfair treatment as a result of their complaint or report.

The Company will review this Policy in full at least once every year, taking into account any updates to relevant laws and regulations as well as the evolving needs of our business, and will

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amend or improve it promptly when necessary. We look forward to working hand-in-hand with all partners to advance the sustainable development of the global mineral supply chain and to achieve our shared goal of responsible mineral sourcing!