



Trina Solar Co., Ltd
Environmental, Social, and Governance
(ESG) Management Policy

Leading Dep.: Risk Control and Management Department

Support: /

Approval: ESG

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ESG Management Policy

Chapter I: General Provisions

1.1 Purpose

The ESG Management Policy is established to standardize Trinasolar's ("the Company", "we") environmental, social and governance (ESG) management practices, ensure the effective operation of the Company's ESG management system, enhance overall capability to fulfill ESG responsibilities, and support the implementation of the Company's sustainability strategy.

This policy is developed in accordance with the *Code of Corporate Governance for Listed Companies*, *Administrative Measures for the Legal Disclosure of Corporate Environmental Information*, the *Articles of Association of Trinasolar*, as well as other applicable laws, regulations and internal guidelines, taking into account the actual situation of the Company.

This policy serves as the Company's code of conduct for ESG management, provides a foundation for delivering ESG management assurance to stakeholders, and guides establishment of the Company's ESG management system.

1.2 Scope

This management policy applies to Trina Solar Co., Ltd. and its wholly-owned and holding subsidiaries and branches (hereinafter referred to as "Trinasolar", "the Company" or "we"). Participating companies of the Company may refer to this policy as a guideline for implementation.

1.3 Terms and Definitions

Terms	Definitions
ESG	The acronym of <i>Environmental, Social and Governance</i>, which stands for environmental protection, social responsibility and corporate governance. Environmental refers to the interrelationship between the Company's business activities and the external environment, including: resources and energy consumption, pollution emissions, environmental management, climate change, biodiversity, environmental opportunities and other issues. Social refers to the relationship between a company and various stakeholders. This covers issues such as supply chain management, responsible sourcing, employee rights, occupational health and safety, customer and product responsibility, and social opportunities. Governance refers the structures and processes that guide corporate oversight and accountability, including the relationships among shareholders, directors, and management. Key issues include governance structure, governance mechanisms, and corporate governance opportunities, etc.
ESG issues	ESG issues refers to the specific themes within the Environmental, Social and

	Governance dimensions. They represent the detailed breakdown and refinement of ESG-related topics. Material issues are those that have a substantial impact on stakeholder assessment and decision-making. Key issues are the most urgent and important identified through the evaluation process.
Stakeholders	Groups or individuals who are affected by or influence the Company's decision-making, including but not limited to the government, shareholders, employees, clients, suppliers, associations, the media, the public, partners, etc.
ESG report	A document prepared and released periodically or as needed to communicate with stakeholders. It reflects the Company's ESG philosophy and understanding, and systematically disclose environmental, social, and governance activities and performance information.

Chapter 2 ESG Management System

2.1 Overview of ESG Management Structure

The Company's ESG management structure adheres to the principle of top-down management, aligning with the Company's ESG sustainability vision and grounded in a strong ESG governance culture. The ESG management structure is divided into four levels: the governance level, the management level, the operational level and the supervision level.

The Board of Directors, as the highest governance body for ESG matters, oversees and directs the management of ESG and sustainability issues. The Strategy and Sustainability Committee serves as the governance body for ESG management and the highest decision-making body for ESG matters. Accountable to the Board of Directors, it deliberates on the Company's sustainability and ESG planning goals, performance, annual Sustainability/ESG report and other major matters. It guides and oversees the implementation of sustainability and ESG initiatives and makes recommendations to the Board of Directors. Led by the Chairman, the Strategy and Sustainability Committee is responsible for the Company's ESG strategy and performance related to the Company's material ESG issues (including but not limited to climate change, water resource management, sustainable supply chain, labor practices, cleantech innovation, and information security and privacy protection).

The ESG Management Committee, as the administrative body for ESG matters, is led by the Co-president, who is also a member of the Board. It is responsible for developing integrated ESG roadmaps and annual action plans ((including but not limited to climate change, water resource management, sustainable supply chain, labor practices, cleantech innovation, and information security and privacy protection), coordinating, guiding and monitoring cross-functional governance of material ESG issues and overseeing the operation of the ESG management system.

The operational level consists of departments responsible for specific ESG issues, the cross-

functional ESG Working Group and ESG-related management departments and organizations. Its responsibility is to implement the company's ESG management in their respective professional fields, and identify, evaluate and screen important ESG issues, set up objectives and work plans for each ESG issue and special work then promote the implementation of the plans.

The Audit and Supervision Department is the supervision level to take the supervisory responsibilities of ESG management.

Chapter 3 ESG and Sustainability Vision, Management Philosophy and Objectives, and Guidelines of ESG Overall Development Plan

3.1 ESG and Sustainability Vision

The Company's ESG and sustainability vision: Solar energy for all.

3.2 ESG Management Philosophy and Objectives

1. ESG management philosophy: Our ESG management philosophy is built on the principles of preservation, innovation, and win-win cooperation. All employees are expected to uphold ESG values and stick to the bottom line, pioneer and create value, and work collaboratively to promote green development and mutually beneficial outcomes.
2. ESG management objectives: The Company is committed to continuously enhancing its ESG management practices to build up a high-quality and efficient ESG management system that supports the realization of the sustainability vision. Efforts will focus on steadily improving the effectiveness of ESG issues management, advancing green, low-carbon, and sustainable development, and achieving a leadership position in environmental, social, and governance practices within the industry.

3.3 Guidelines of ESG Overall Development

1. Forward-looking insights: Develop a deep understanding of domestic and international ESG-related policies and industry trends. Identify ESG risks and opportunities, cultivate agile ESG management capabilities and strengthen strategic foresight to flexibly respond to external changes.
2. Strategic planning: Integrate ESG concepts into the Company's development strategy, system design, and overall layout to maximize the economic, social, and environmental benefits, thereby driving sustainable development.
3. Governance-driven leadership: Continuously innovate the governance and management systems in alignment with the Company's strategy. Enhance the ESG management framework and oversight of key ESG issues, improve ESG reporting and rating performance, strengthen internal ESG capabilities, and establish a clear ESG value proposition externally.
4. Operational integration: Integrate ESG concepts and plans into daily operations, drive functional departments and organizations to improve their management capabilities, and

effectively and continuously improve the operation of ESG management system.

5. Value creation: Achieve significant improvement of the Company's operational and management resilience, establish international competitiveness with low-carbon product labels, promote the Company to realize ESG value with substantial ESG management performance. The Company aims to become an ESG leader within the industry, influence upstream and downstream stakeholders across the value chain, and seize opportunities in the global transition toward sustainable development.

Chapter 4 ESG Strategic Planning, Management Implementation and Evaluation

4.1 ESG Strategic Planning and Program Management

1. External ESG environment analysis: The Company shall track and analyze the updates and trends of domestic and international ESG-related laws, regulations and policies. Each department is responsible for conduct impact assessments by analyzing the challenges and opportunities these external ESG factors present to their respective business areas and proposing appropriate response measures.
2. Internal resource planning: The Company shall organize, appoint, or coordinate cross-functional working groups as needed to deliberate and make decisions on the allocation and utilization of internal resources. Each department is expected to utilize internal resources effectively in alignment with the Company's development strategy.
3. Based on the findings of internal and external ESG environment analysis and internal resource planning, the Company formulates the medium- and long-term ESG development plan.
4. In accordance with the approved ESG strategic plan, each ESG management department shall break it down into a short-term plan. This plan shall specify the responsible departments, key measures, performance targets, and corresponding budgets..

4.2 ESG Management Implementation and Audit

1. In alignment with the short-term ESG plan, the Company formulates and implements an annual ESG work plan based on responsibilities of each department. ESG-related activities will be evaluated as part of the annual performance assessment.
2. The Company regularly monitors and reviews the implementation of the previous year's ESG plan to identify lessons learned and support continuous improvement.
3. The Company conducts internal audits of ESG-related management systems on a regular basis. The ESG management department leads the formation of a cross-functional ESG audit team responsible for organizing and carrying out internal audits to verify and ensure the ongoing relevance, effectiveness, and compliance of the ESG management system.

4.3 ESG Performance Evaluation and Assessment

1. The ESG management committee shall evaluate the ESG management plans and their

- implementation across ESG-related departments in accordance with the Company's appraisal policies. Based on the evaluation results, the ESG management committee shall propose a rewards and penalties scheme, which will be submitted for approval in line with those policies.
2. The remuneration of the management personnel (including senior executives and middle-level managers) is linked to ESG performance assessment outcomes. These evaluations consider but are not limited to factors including climate change management, energy saving and emission reduction, technological innovation, employee management, supply chain management, occupational health and safety, risk control and compliance, business ethics and anti-corruption, and information security and privacy protection. Based on the Company's performance management system, evaluation results will directly inform decisions on performance bonuses, salary adjustments, and promotion or demotion, thereby reinforcing accountability and promoting continuous ESG improvement.
 3. Clawback and malus provisions (including but not limited to ESG performance): In the event of serious violation of the Company policies, gross negligence, violation of laws and regulations, falsification of performance data, etc., the Company reserves the right—following investigation and verification—to recalculate and recover any performance-based compensation previously awarded to relevant senior management, in accordance with its internal control and remuneration policies.

Chapter 5 ESG Risk Management

5.1 ESG Risk Management

1. The Company has established an ESG risk management process, embedding the identification, assessment and management of environmental, social and governance risks into key business processes, including strategic planning, major investment decisions, mergers and acquisitions, and new business development.
2. The ESG Management Committee regularly convenes cross-functional working groups to systematically identify and assess ESG risks and opportunities across all aspects of the Company's operations and value chain, based on the dual perspectives of financial materiality and impact materiality. The Company maintains a risk register specifying risk levels, responsible parties and mitigation measures.

Chapter 6 Management of Key ESG Issues

6.1 ESG Needs from Stakeholders

1. The Company identifies stakeholders as individuals or groups who may be affected by the Company's product or services, or whose actions may influence the Company's strategy and objectives. This identification is based on the Company's strategy and business operations, with reference to industry practices and in accordance with the Global Reporting Initiative (GRI) or other widely recognized domestic and international standards.

2. The designated management departments are responsible for engaging with identified stakeholders by regularly or as needed, collecting and analyzing their expectations and feedback, evaluating their significance and responding to their needs in a timely manner.

6.2 Management of Key ESG Issues

1. Establishment and maintenance of ESG issue database: The Company establishes and maintains a comprehensive database of ESG issues. The database is updated annually with reference to international standards, including the Global Reporting Initiative (GRI), the International Sustainability Standards Board (ISSB) standards, the United Nations Sustainable Development Goals (UN SDGs), and the Task Force on Climate-related Financial Disclosures (TCFD), as well as in alignment with the Company's strategy and business operations.
2. Assessment of key issues: The Company coordinates with relevant management departments to engage various stakeholders to assess stakeholder concerns related to each ESG issue. The assessment evaluates the materiality from both the "financial materiality" and "impact materiality" dimensions using diverse engagement methods. Based on the assessment results, the Company develops an ESG materiality matrix. Taking into consideration internal resources, as well as the urgency and importance of each issue, those requiring immediate action are identified as key ESG issues. The outcomes of this materiality assessment are also integrated into the Company's Enterprise Risk Management (ERM) process.

Chapter 7 ESG Information Disclosure

7.1 Standardized ESG Information Disclosure

1. The Company regularly disclose ESG information to transparently communicate its ESG compliance practices, promote ESG performance and enhance brand value and corporate influence.
2. Each ESG management department is responsible for collecting and selecting ESG-related practices, experience, and recognitions within the scope of its management, and providing accurate and effective information to the Company's branding department in a timely manner.

7.2 Compiling and Publication of ESG reports

The Company prepares ESG reports in accordance with the applicable disclosure requirements of the Shanghai Stock Exchange, as well as international standards of GRI, the ISSB, and the TCFD. The Company adjusts the basis for ESG report preparation in a timely manner according to the updates and changes in the relevant rules applicable to the Company.

Chapter 8 ESG Safeguard System

1. Leaders at all levels are expected to place strong emphasis on ESG management and actively apply ESG principles to drive and support business development.
2. The governance, management and operational levels should prioritize the recruitment and

- development of ESG management talent, continuously enhancing their expertise and capabilities to build a team that meets the Company's ESG management requirements.
3. ESG Training for the Board of Directors and Senior Management: The Company regularly provides ESG-focused training for Board members and senior management, covering topics such as domestic and international SG regulatory developments, industry best practices, climate change risks, biodiversity conservation, and human rights due diligence, thereby enhancing decision-makers' ESG governance capabilities.
 4. Whistleblowing mechanism: The Company has established a whistleblowing and complaints channel that enables employees, suppliers, local communities, and other stakeholders to report ESG-related violations, including but not limited to corruption, forced labor, environmental violations, discrimination, and harassment, either anonymously or under their own names. Reports are handled independently by the Audit and Supervision Department. The entire reporting and investigation process is subject to strict confidentiality, and retaliation against individuals who raise concerns in good faith is strictly prohibited.
 5. To ensure effective implementation of ESG initiatives, ESG-related budgets shall be incorporated into the Company's overall budget management system, based on statistical analysis and projected needs.

Chapter 9: Supplementary Provisions

9.1 Revision Record

Doc#	Version	Responsible person/Dep.	Effective Date	Description
TSL-CM-006	V01	Risk Control and Management Department\Compliance Department	2024-04-10	New version release
TSL-CM-006	V02	Risk Control and Management Department\Compliance Department	2025-05-30	Amendment
TSL-CM-006	V03	Risk Control and Management Department\ESG Management Department	2026-09-01	Amendment