

Trina Solar Supply Chain Due Diligence Manual

1. Purpose

In order to further standardize the company's supplier management, strengthen the whole life cycle management of suppliers, improve the supplier management system, optimize the procurement resources, avoid procurement risks, ensure the quality of procurement, control procurement costs, establish strategic cooperation, mutual benefit, healthy and standardized supply and demand partnership, and safeguard the legitimate rights and interests of the company. This manual clarifies Trina Solar's due diligence management policy and strategy and comprehensively describes the company's due diligence system in accordance with the requirements of the European Union's Corporate Sustainability Due Diligence Directive (EU) 2024/1760, Germany's Due Diligence in Supply Chain Enterprises Act LkSG, and the European Union's Battery Regulation (EU) 2023/1542 and other relevant due diligence management regulations. The manual is intended to be used as a reference material for internal employees to understand the basic requirements of supply chain due diligence, and as an official illustration to demonstrate Trina Solar's realization of supply chain due diligence management and pursuit of customer satisfaction.

2. Scope of application

This manual applies to the management of supplier due diligence involved in the procurement business of each business unit of Trina Solar (hereinafter referred to as "the Company").

3. Reference Standards

This manual has been developed with reference to the following documents:

EU Due Diligence Directive on Corporate Sustainability (EU) 2024/1760

EU Battery Regulation (EU) 2023/1542

German Due Diligence Act for Supply Chain Companies LsKG

United Nations International Bill of Human Rights

United Nations Guiding Principles on Business and Human Rights

ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy

Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises

Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Business Conduct

Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

4. Definition of terms

Abbreviation	Definition
DD	Due Diligence: The process by which an organization identifies, prevents, mitigates, and describes how it will address actual and potential negative impacts on the economy, the environment, and (including human rights).
DDS	Due Diligence System,
ESG	Environmental, social and governance Environment, society and governance are a range of issues that investors, businesses and organizations should consider when making investments.
OECD	Organization for Economic Co-operation and Development Organization for Economic Cooperation and Development, an intergovernmental international economic organization of 38 market economies, established on 30 September 1961 and headquartered in Paris
CSR	Corporate Social Responsibility A management philosophy in which the company integrates social and environmental issues into its business operations.

5. Due Diligence System (DDS) Policy and Purpose

Trina Solar integrates supply chain due diligence management into its sustainable development governance system, and is committed to fulfilling its social responsibility of respecting human rights and protecting the environment through close cooperation with supply chain partners, promoting responsible business practices in the global supply chain, and supporting and promoting the sustainable development of global business. The company will conduct detailed due diligence

management of the supply chain to identify the actual or potential impacts that the upstream supply chain may have on the economy, environment and society. Based on these identifications, specific due diligence management plans and implementation plans are formulated to reduce the identified risks in the operation and activity chain.

In addition, the company will continue to track and evaluate the effectiveness of due diligence management work and ensure the transparency of these activities to demonstrate its commitment to sustainable development and corporate social responsibility.

6. Organizational Environment

6.1 Understanding the organization and its environment

6.1.1 Trina Solar conducts due diligence management and due diligence investigations annually in accordance with internal and external factors and/or conditions of due diligence management, to ensure the openness and transparency of the company's due diligence management and to avoid any conflict between itself and the enterprises in its supply chain in terms of violation of human rights, damage to the environment or other disruptions to the social order.

6.1.2 Internal and external factors related to the Company's due diligence management include, but are not limited to:

- a) Policies, laws, regulations, and general industry guidelines on due diligence management at the international, domestic, operational, and business locations;
- b) Incorporate the Company's values, mission, vision, sustainability strategy and goals, commitment to responsible business practices, and due diligence management program;
- c) Management requirements arising from the development, maintenance or re-engagement of contract-based business relationships (e.g., mergers, acquisitions, new customers and markets, etc.).

6.2 Understanding the needs and expectations of interested parties

6.2.1 The Company routinely conducts annual due diligence context assessments to identify affected and potentially affected stakeholders based on the size of the organization, its operating environment, its business model, its supply chain model, and the nature of its products and services, and conducts stakeholder communications to gather and understand the needs and expectations of the stakeholders.

6.2.2 The due diligence management needs and expectations of interested parties include, but are not limited to:

- a) Integrate due diligence management into corporate governance and supply chain management systems;
- b) Incorporate conditions and standards for due diligence management into written documentation and provide adequate and publicly available resources and training to enable relevant parties to fully understand and implement due diligence management;
- c) Identify and remove barriers to due diligence management created by your own way of doing business;
- d) Receive feedback and oversight, disclose information related to the due diligence management process; obtain technical support and credit endorsement from an external independent organization, if necessary.

6.3 Determining the scope of DDS

6.3.1 In order to determine the scope of the due diligence system, the Company determines the boundaries and applicability of the system, taking into account the actual needs and capabilities of each stakeholder.

6.3.2 The Company establishes a due diligence system that applies to the Trina Solar organization itself, its upstream supply chain.

6.3.3 The purpose of due diligence management is to meet relevant international and domestic compliance entry and operational requirements to ensure business continuity.

6.4 DDS and Processes

Trina Solar establishes, implements, maintains and continuously improves a process-based due diligence system in accordance with the requirements of the aforementioned Act, standards and guidelines.

Trina Solar identifies processes relevant to achieving due diligence management objectives and their application within the company, including those processes that involve due diligence management and those processes that do not involve due diligence management but affect the achievement or delivery

of responsible business conduct. During the due diligence system planning process, specific consideration is given to the response to identified due diligence management risks and opportunities and to changes required for the process to achieve its intended results. Where necessary, the Company maintains documented information to support the operation of these processes and retains the documented information as evidence that the operation of the processes for the purpose of due diligence management is carried out in accordance with the requirements of the action plan.

7. Leadership

7.1 Leadership and commitment

Trina Solar's top executives have demonstrated their leadership role and commitment to DDS in accordance with the organizational environment and strategic direction, and in line with due diligence requirements such as the EU Battery Regulation, through the following:

- a) Including DDS in management reviews will ensure that it is fully considered and valued;
- b) Develop and communicate DDS policies to ensure that due diligence objectives are established and met;
- c) Appointment of a representative of the DDS administrator to provide the required resources;
- d) Communicate to the Company the importance of complying with the DDS requirements of customers and laws and regulations.

8. Support

8.1 Resources

8.1.1 General provisions

Trina Solar ensures that the resources required to establish, implement, maintain and continually improve the due diligence system are made available. Managers should identify and obtain the various resources needed to implement the company's due diligence policies and objectives.

8.1.2 Personnel

Trina Solar identifies and equips the required management, assessment, auditing, record-keeping and other relevant personnel to ensure effective management of supply chain ESG risk identification,

assessment, prevention, mitigation, resolution and remediation, with the goal of meeting relevant external laws and regulations and customer requirements. The company enhances the professional knowledge and skills of its employees in due diligence through training and development to ensure that due diligence is carried out efficiently.

8.1.3 Technical tools

Trina identifies and provides the necessary technical tools to support all aspects of supply chain due diligence. These technical resources include:

- a) Establish and maintain an advanced information management system for supplier auditing, collection, analysis and reporting of supply chain data to ensure accuracy and timeliness;
- b) Use the Supply Chain ESG Risk Due Diligence Audit Form and Supplier Risk Assessment Form to support the development and deployment of ESG risk identification and analysis tools to ensure supply chain transparency and traceability.
- c) Establish a supply chain risk complaint and remediation mechanism to ensure that issues are reported and resolved in a timely manner;

8.2 Capacity

Trina Solar ensures that all relevant personnel are equipped with the competencies required to perform supply chain due diligence. The company develops and implements training programs to enhance employees' professional knowledge and skills in due diligence to ensure that they are able to effectively identify, assess, prevent, mitigate, resolve and remediate ESG risks in the supply chain. The training includes, but is not limited to, supply chain management, environmental and social responsibility, laws and regulations.

8.3 Awareness

To enhance the awareness of suppliers, the company conducts risk management training for key suppliers, helping them to understand and comply with the due diligence requirements of Trina Solar.

8.4 Communication

In order to ensure the effective implementation of a supply chain due diligence system, a comprehensive communication mechanism must be established to facilitate the timely transmission

and sharing of information. Communication should run through the entire process of due diligence, including all aspects of risk identification, assessment, monitoring and mitigation.

8.4.1 Internal communication

Ensure that communication is open and unhindered between departments within the company and with leadership. Organize regular internal meetings to share the latest developments and challenges in supply chain risk management and encourage employees to provide insights and suggestions. The management representative reports to the top management on the following: ① Findings of supply chain due diligence risk assessment; ② Design and implement risk management plans, monitor and follow up the performance of risk response work.

8.4.2 Supplier communication

Establish transparent and open communication channels with suppliers to regularly share supply chain status, risk events and mitigation measures. When necessary, face-to-face communication with suppliers is conducted to address specific issues and build trust.

8.4.3 Stakeholder communication

Maintain communication with external stakeholders, such as investors, customers, government agencies, etc., to keep them informed of supply chain risk management policies and practices, as well as any changes that may affect their interests.

8.4.4 Training and education

Raise employee awareness of supply chain risk management through training and education to ensure that they are able to communicate relevant information effectively.

8.4.5 Feedback mechanism

Establish a feedback mechanism that encourages employees and suppliers to provide feedback on supply chain risk management in order to continuously improve the communication process.

8.4.6 Records and documentation

Maintain detailed records and documentation of communication so that the occurrence and content of communication activities can be reviewed and documented as needed.

The use of the Supplier Risk Assessment Form (SRAF) as a risk assessment tool supports communication between supply chain management and suppliers and helps to address identified potential risks in a timely manner. Through these communication measures, companies are able to ensure that information on supply chain due diligence is appropriately disseminated and understood, thereby increasing transparency and resilience to risk throughout the supply chain.

8.5 Written information

Establish and maintain a systematic documented information management system to ensure the effective implementation of the supply chain due diligence system and guarantee the accuracy, timeliness and confidentiality of the information.

9. Operation

9.1 Supply chain risk management system operation

9.1.1 At the stage of new supplier certification, ESG entry thresholds are set, supplier-related agreements are signed, due diligence management audits are conducted, and suppliers violating the "zero tolerance items" of suppliers are vetoed.

9.1.2 At the supplier selection stage, we prioritize suppliers with good due diligence management performance, as evidenced by compliance with and signing of all ESG-related regulations and commitment letters of Trina Solar, ESG-related qualifications and certifications, disclosure of ESG reports and other management initiatives.

9.1.3 In the supplier monitoring and auditing phase, we carry out supplier due diligence management assessment, whereby suppliers are asked to complete a supplier risk self-assessment in accordance with the requirements of the Supplier Risk Assessment Form. We also conduct on-site/ desktop audits of standard risk suppliers identified in the self-assessment results and suppliers of key materials identified in the Key Material Traceability Template (at least one of the conditions is met). We follow up and rectify any problems found.

9.1.4 In the supplier performance management phase, we conduct a due diligence management performance assessment, provide information on the results of due diligence management and the associated rewards and penalties, and conduct supplier due diligence management empowerment training.

9.1.5 During the supplier exit phase, assess the due diligence management risks that may occur with supplier exit and prevent them appropriately with a gradual exit.

9.2 Due Diligence Management Policy and Commitment

9.2.1 The company is committed to following internationally recognized industry compliance standards, and developing a Supplier Code of Conduct covering labor standards, health and safety, environmental protection, business ethics, and management systems. We follow the OECD Due Diligence Guidelines and integrate due diligence requirements into our procurement strategy and business processes, including supplier certification, selection, monitoring and auditing, performance management and exit processes, prioritizing the selection of suppliers with excellent due diligence performance and restricting the use of non-compliant suppliers. The enterprise is committed to establishing a risk-based, multi-level supplier due diligence management monitoring mechanism, adopting internationally recognized auditing methodologies and incorporating legal and regulatory requirements and industry-specific ESG risk points to effectively identify, prevent, mitigate and deal with negative impacts on operations and the supply chain, and to predict, prevent and control due diligence management risks. At the same time, the enterprise will maintain external communication, update the due diligence management policy in a timely manner, conduct due diligence management training among the procurement team and suppliers, and develop and implement procurement strategies and practices to prevent or minimize identified risks.

9.2.2 The specific commitments that Trina Solar suppliers are required to fulfill are listed below:

- a) Understand and strictly implement the ESG-related requirements for suppliers incorporated in the "Material Purchase" contract, and clarify the responsibilities and obligations between suppliers and Trina Solar, especially the relevant requirements in the supply chain due diligence.
- b) Understand the Supplier CSR Code of Conduct and sign the Supplier CSR Commitment Letter to ensure that suppliers understand and commit to Trina Solar's environmental, occupational health and safety, and energy management policies, as well as Trina Solar's requirements for the Supplier CSR Code of Conduct.

- c) Sign the Conflict Minerals Non-Use Commitment to ensure that suppliers comply with Trina Solar's management requirements for conflict minerals and commit to not using minerals from conflict areas in their products.
- d) Signing the Letter of Commitment on Legal Employment to ensure that suppliers comply with labor laws and regulations and protect the legitimate rights and interests of employees.
- e) Sign the Supplier Integrity Commitment Letter to ensure that suppliers understand and comply with Trina Solar's business ethics-related requirements.

9.3 Management oversight responsibilities

9.3.1 The company establishes a due diligence and assessment mechanism to monitor suppliers, dynamically manage potential risks, especially social and environmental impacts, and ensure that employees comply with due diligence requirements.

9.3.2 The company continuously updates the Supply Chain Due Diligence Management Policy, evaluates the effectiveness of management measures, and supports the implementation of customer due diligence to ensure compliance with the latest laws, regulations and social responsibility standards.

9.4 Supply Chain Risk Identification and Assessment

The Company uses the *Supplier Risk Assessment Form* as a tool to identify suppliers' operational and ESG risks, conduct supplier risk assessments, and flag potentially high-risk suppliers.

The *Key Material Traceability Template* is deployed to identify key materials within the supply chain. Suppliers are tiered based on procurement volume, geographic location and relevant information to identify core suppliers and define audit priorities for the short, medium and long term.

Non-conformities identified during audits are classified by severity into critical non-conformities, major non-conformities and minor non-conformities. The Company follows up on non-conformities until suppliers complete correction within the specified timeframes.

9.5 Supply Chain Risk Identification and Assessment

9.5.1 In order to receive, review, respond, report and deal with the expectations and demands of various stakeholders on the due diligence system, to strengthen the communication and collaboration with external parties, and to continuously improve the Company's due diligence management capability, this mechanism is therefore formulated.

9.5.1.1 In order to ensure the effective operation of the complaint grievance and communication mechanism, this mechanism only accepts complaints or information provided in good faith and subject to the following conditions:

- a) Identified risks and challenges associated with the Company's due diligence management;
- b) Gaps and deficiencies in the Company's due diligence systems and measures;
- c) Other relevant recommendations and suggestions involving due diligence management that are supported by sufficient evidence.
- d) Any information regarding the above description and communication should be sent to the company's Supply Chain Strategy Department at supplychain.strategy@trinasolar.com.

9.5.1.1 For complaints or communications submitted by complainants, the following conditions must be met:

- a) State the name of the complainant, the organization (if any) and whether or not confidentiality has been requested, or if confidentiality has been requested, it will be kept confidential by the Company;
- b) If the complaint is submitted by a sent representative, information on the authorized person and contact details must be provided;
- c) A detailed description of the subject matter of the complaint or communication, together with supporting evidence, will facilitate the effective resolution of the complaint or communication. Suggestions for resolution measures that the complainant considers feasible are welcome.

9.5.2 This grievance and communication mechanism operates through the following steps:

- a) first, the content of the grievance is received and recorded, followed by an initial assessment of the applicability of the grievance;
- b) then the grievance is acknowledged and a timetable for processing is fed back;
- c) immediately thereafter, an investigation is conducted and a response is formed, in the event of dissatisfaction on the part of the complaining party, further research and improvement actions are implemented;
- d) and, finally, the effectiveness of the handling of the grievance and the efficacy of the mechanism are monitored and evaluated on a regular basis.

10. Continuous Improvement

The Supply Chain Strategy Department regularly evaluates and updates the DDS based on regulatory requirements, external standards, and the company's own business needs.

11. Revision record

Doc #	Version	Responsible Person/Dep.	Effective date	Description
TSL-SCM-012	V01	Supply Chain Strategy	2024-09-30	New version
TSL-SCM-012	V02	Supply Chain Strategy	2026-01-30	Amendment