



Trina Solar Co., Ltd
Global Human Rights Principles

Leading Dep.: Compliance management

Supportive Dep.: EHS、 Legal、 HR

Approval: EMT

Doc#: TSL-CM-012

Effective date: 2025-10-13

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”). 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 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 laws of the countries 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 supply 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
- Conflict Minerals Management Policy
- EHS Management System Internal Audit Management Procedure
- Whistleblowing 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 regulations 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 set 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 supply chain. We continuously keep vigilant in our commitment to safeguard workers' rights in global supply chains. We forbid harsh or inhumane treatment, including corporal punishment, threats of violence, confiscation of identity documents, the requirement of deposits or financial guarantees during recruitment or employment, or other similar means. Trinasolar will not employ children and has implemented measures to prevent its occurrence. We have established mechanisms to identify, address and remediate instances of child labor. Workers under the age of 18 are not allowed to perform hazardous work or engage in work that is unsuitable for their personal development and well-being.
- b) **Working Hours, Wages and Benefits:** Trinasolar practices working hour system that is not to exceed the maximum set by local law or no more than 60 hours per week, whichever is stricter. Workers should not work longer than 6 consecutive days without at least one day off. Trinasolar pays employee compensation which meets, as minimum, or exceeds the requirements of applicable law, including those related to minimum wages, overtimes, and legally mandated benefits. Trinasolar is dedicated to enhancing employee benefits to meet their essential living needs. To determine appropriate wage levels, we 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 holidays, paid annual leave, parental leave, maternity leave, social insurance coverage including endowment, medical, unemployment, work-related injury, and maternity insurance, as well as public housing funds and supplementary commercial insurance. We are continually optimizing our benefits system to improve employees' quality of life.
- c) **Responsibility in Supply Chain:** As embodied in Supply Chain Due Diligence Manual and Conflict Minerals Management Policy, Trinasolar communicates these human rights principles to suppliers and their upstream partners through supply chain due diligence management. We conduct regular ESG audits of suppliers to promote enhanced management practices and ensure compliance with its labor and human rights requirements. The human rights principles are incorporated into our CSR Code of Conduct of Suppliers, and suppliers are required to sign documents including the Supplier ESG Commitment, Commitment Letter on Lawful Employment, and Statement of Commitment on Non-Use of Conflict Minerals. We require suppliers to set up 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. We put a high priority on conflict minerals, implementing a traceability system for materials. In collaboration with our

suppliers, we employ responsible sourcing practices to reject minerals that are mined through human rights abuses, environmental destruction, or violence, thereby promoting sustainable development.

- d) Environment 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. Our commitment to environmental stewardship is embodied in Trinasolar's Environment, Occupational Health & Safety (EHS) and Energy Management policy. Trinasolar continuously keeps vigilant in its commitment to safeguard environment stewardship in its global supply chain.
- e) Workplace Safety:** Trinasolar is committed to providing a healthy and safe workplace for its employees, contractors, and communities. We seek to provide a secure business environment for the protection of our employees, products, materials, equipment, and information. 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 concerns about how technology products may be used to violate human rights. The challenges include EHS concerns that may arise from 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 span.
- g) Diversity and Nondiscrimination:** Trinasolar values diversity, equity and inclusion in our workforce, as well as in our customers, suppliers, and other stakeholders. We adhere to a zero-tolerance policy toward all forms of discrimination. We provide equal employment opportunity for all applicants and employees, and uphold the principle of equal pay for equal work, regardless of gender. 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 affiliation or any other characteristic protected by local law, regulation or ordinance. 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, and suppliers with dignity and respect. We are committed to maintaining a workplace free of harassment and abuse. We do not tolerate either harassment behavior or any other forms of violence or abuse. Verified incidents of harassment and abuse will be subject to disciplinary action in line with the procedures outlined in the Employee Handbook. We provide awareness training for all categories of 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:** Privacy and freedom of expression are mutually reinforcing rights. Trinasolar is committed to the right of privacy. We seek to protect against any unauthorized access, use, destruction, modification, or disclosure of company data and 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 encourages employees to provide suggestions or opinions to help the company improve its management efficiency. Trinasolar sets up grievance mechanism by providing various channels, including email, hotline, suggestion boxes, online platforms etc., to enable employees, suppliers and other external stakeholders to report any concerns in the workplace.
- k) **Equal Opportunity Assurance:** We highly value and pay particular attention to the special needs of vulnerable groups and employees who may be affected by the climate transition. Safeguards are implemented to ensure these individuals have access to skill development and are able to participate equally in all aspects of employment and career advancement.

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 systems. 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 employees, local communities, and 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.

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 ESG internal audits are conducted in line with our ESG Management System, complemented by internal and third-party ESG 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 ESG 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

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

7.2 Validity period

This policy is drafted interpreted and maintained by Compliance Management Department and is approved and issued by the Company's 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: Compliance@trinasolar.com.

8. Attachment

NA