

Annual Report on the Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour

Fiscal Year 2023

Introduction

This publication is the annual report made by JA Solar USA Inc. (“**JA Solar USA**”) pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “**Act**”) for the financial year ended 31 December 2023 (the “**Annual Report**”). This Annual Report has been approved by the board of directors of JA Solar USA on May 30, 2024 and includes a description of the steps JA Solar USA has taken during 2023 to prevent and reduce the risk of forced labour and child labour in relation to its business and supply chain.

Structure and Activities

JA Solar USA is legally constituted and has its corporate headquarters situated in the state of California in the USA. The main business of JA Solar USA is the sale and distribution of photovoltaic modules in the USA and Canada. JA Solar USA is a subsidiary of JA Solar Technology Co., Ltd. that is registered in the People’s Republic of China and listed on the Shenzhen Stock Exchange. JA Solar Technology Co., Ltd. and its subsidiaries (collectively “**JA Solar Group**”) are one of the leading manufacturers of high-performance solar power products.

JA Solar USA had 21 staff throughout the year 2023. All employees are based in the USA. JA Solar USA does not control any other entities and no other entities are covered by this Annual Report.

Approach to Forced Labour and Child Labour

JA Solar USA, as a major vendor of photovoltaic modules, has a role to play in global efforts to combat forced labour and child labour. JA Solar Group is committed to high standards of sustainability and is a signatory to the UN Global Compact initiative. Two principles of the UN Global Compact are the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. JA Solar USA and JA Solar Group are strongly committed to ensuring that all our operations and our complete supply chain are free from any form of forced labour and child labour.

JA Solar Group strictly follows labour standards and related laws and regulations in all its factories and offices around the world. JA Solar Group has issued and implemented a Code of Conduct that applies to all its and JA Solar USA’s employees. The Code of Conduct explicitly prohibits any use of modern slavery, forced labour and child labour. Several whistle-blowing channels are in place for both employees and external

stakeholders to report any potential violations of the Code of Conduct, including exposure to forced labour and child labour.

JA Solar Group regularly informs its stakeholders on the efforts to protect human rights via the Sustainability Report and ESG Report. The latest report is available on JA Solar Group's website. In this report, JA Solar Group firmly prohibits child labour and forced labour.

Supply Chain Overview

JA Solar USA has no own production or manufacturing and purchases materials, goods and services from different suppliers. All photovoltaic modules, making up the absolute majority of the business, are directly purchased from other entities within JA Solar Group. JA Solar Group purchases silicon materials, cells, aluminum frames, glass and other materials as well as logistics and other services.

JA Solar Group also has its own production of silicon wafers, cells and photovoltaic modules. All photovoltaic modules sold and distributed by JA Solar USA in Canada and the USA during 2023 contain cells and silicon wafers produced within JA Solar Group.

JA Solar Group is strongly committed to ensuring that its operations and supply chain are free from any form of forced labour and child labour. JA Solar Group establishes long-term relationships and ongoing collaboration with its suppliers and encourages them to continuously improve their own social responsibility practices.

Risk Identification and Risk Management

In 2023, JA Solar Group undertook a comprehensive supply chain mapping exercise, encompassing materials, equipment and services. The mapping process leveraged financial data and information from the procurement process. The primary objective during the year was to identify key suppliers across various domains and to understand their geographical distribution. JA Solar Group categorized its suppliers into eight distinct groups based on the different key materials they provide. The supply chain map offers JA Solar Group an overview of its crucial suppliers and their respective geographical locations, enabling informed decision-making and strategic planning for future actions.

Based on the supply chain map, JA Solar Group identified 90 key suppliers that were presented with a comprehensive environmental, social and governance (ESG) questionnaire. The ESG questionnaire encompasses a comprehensive array of inquiries delving into various critical aspects. These include, but are not limited to, adherence to social and labour standards, the prevention of child labour practices, the elimination of forced labour, responsible sourcing practices and supply chain accountability measures. The primary objective is to proactively identify and mitigate potential risks within the

supply chain and to foster a collaborative partnership with suppliers, providing guidance and support to drive continuous improvement initiatives. JA Solar Group received a 100% response rate from the 90 critical suppliers, highlighting the strong relationship and open lines of communication it has cultivated with its key partners.

The supply chain mapping activities, third-party screening, the ESG questionnaires, the due diligence procedures (described below), and interactions and information from suppliers, third party auditors, customers and other stakeholders are data used to assess and identify any actual or potential adverse human rights impacts in JA Solar USA's and JA Solar Group's operations and supply chains.

JA Solar USA is an entity with 21 employees which all are based in the USA and are involved in wholesale business of photovoltaic modules. JA Solar USA's direct business operations have a very low risk of forced labour and child labour due to its geographical location, type of business conducted and limited number of employees. JA Solar USA's direct suppliers are mainly entities within JA Solar Group that have a low risk of forced labour and child labour due to the rigorous policies and controls that JA Solar Group has in place and that are expounded upon in this Annual Report. The area where JA Solar USA faces potential risks of forced labour and child labour exploitation is indirect suppliers and vendors that make up JA Solar Group's extended supply chain network beyond its direct suppliers and contractors. JA Solar USA and JA Solar Group have identified sourcing of materials and the use of logistic services as areas with potential risks of forced labour and child labour.

JA Solar Group has a comprehensive framework of policies and due diligence procedures in place to identify and mitigate any potential risks related to forced labour and child labour. JA Solar USA and JA Solar Group have not identified any use of forced labour or child labour during 2023. Therefore, no measures have been taken to remediate any forced labour or child labour. For the same reason, no measures have been taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour.

Policies, Review of Suppliers and Due Diligence Procedures

All photovoltaic modules sold and distributed by JA Solar USA are purchased from entities within JA Solar Group. JA Solar USA monitors, follows up and has full insight into JA Solar Group's work to address human rights related risks in the supply chain.

External photovoltaic suppliers of JA Solar Group have to sign a document called Supplier EHS and Social Responsibility Letter of Commitment, which among other things requires the relevant supplier to not use or support the use of forced or compulsory labour as defined in the ILO Forced Labour Convention (No. 29) and to not employ children who are under the age stipulated by local law or who are below the compulsory school attendance age.

Photovoltaic suppliers also have to adhere to JA Solar Group's Supplier Code of Conduct (the "**Supplier Code**") that is a central part of the procurement contract. The Supplier Code strictly prohibits child labour, involuntary labour, human trafficking and modern slavery and includes several whistle blowing channels that can be used by the suppliers, their employees and other stakeholders. The Supplier Code requires suppliers to adopt a management system to ensure compliance with the Supplier Code and the suppliers are expected to hold their suppliers and subcontractors to the same standards and practices. JA Solar Group can terminate the relationship with a supplier that violates the Supplier Code.

JA Solar Group maintains policies for supplier onboarding and management that assign review responsibilities from an environmental, social and governance (ESG) perspective. JA Solar Group regularly reviews and carries out site visits of its suppliers. Most photovoltaic suppliers are, according to internal policies and procedures, subject to review and site visit on an annual basis. The review is carried out by a specific department within JA Solar Group and forced labour and child labour are two parts of the review process. All photovoltaic suppliers will at least be reviewed and visited every three years. JA Solar Group is also conducting third-party screening in relation to key suppliers covering negative news, sanctions, etc.

Effectiveness of Risk Controls

JA Solar USA has been provided full and complete insight into its direct photovoltaic suppliers, which all are part of JA Solar Group. The contractual obligations and rigorous ongoing reviews with accompanying site visits that are carried out by JA Solar USA's direct suppliers are effective in controlling forced labour and child labour risks in the supply chain.

In 2023, JA Solar Group engaged one of the world's premier law firms to conduct a comprehensive gap analysis. This analysis focused on assessing JA Solar Group's adherence to labour regulations and labour compliance within its supply chain. The gap analysis revealed opportunities to enhance our practices further. Several key areas were pinpointed for potential optimization, including:

- mandatory employee training programs,
- refining contractual language in relation to labour agencies, and
- review and update of certain labour related policies.

JA Solar USA and JA Solar Group are actively working to bolster our labour and supply chain compliance systems based on the insights gleaned from this gap analysis. By proactively identifying and addressing areas for improvement, we reinforce our dedication to our employees, partners and customers we serve.

JA Solar USA and JA Solar Group expect suppliers, employees and other stakeholders to report any potential modern slavery violations as soon as becoming aware of them.

JA Solar Group has established comprehensive grievance mechanisms that are available for employees, suppliers and other stakeholders. During the reporting period, there has been no incident, report or inquiry regarding forced labour or child labour. JA Solar USA would take swift and appropriate actions if any violation of forced labour or child labour is detected.

Training and Competence Building

In 2023, JA Solar USA has not carried out any training covering child labour or forced labour for its 21 employees. JA Solar Group has arranged training regarding forced labour, SA8000 Standard, etc. These trainings have not been mandatory for JA Solar USA's employees. However, many employees from JA Solar Group working with procurement and human resources have participated in these trainings.

Moving Forward

In 2024, JA Solar USA and JA Solar Group is committed to enhancing our internal processes related to human rights and responsible sourcing across our operations and supply chain. JA Solar Group will be rolling out comprehensive mandatory training programs for all relevant employees. These programs will focus on educating our workforce about critical issues of forced labour and child labour. JA Solar Group will also be further strengthening our sourcing policies and procedures.

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Zhu Daocheng
Director
May 30, 2024



I have the authority to bind JA Solar USA Inc.