



Approved by the Board of Directors  
JA Solar USA Inc.  
May 30, 2025

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

**Fiscal Year 2024**

### **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 2024 (the “**Annual Report**”). This Annual Report has been approved by the board of directors of JA Solar USA on May 30, 2025.

### **Structure, Activities and Supply Chain Overview**

JA Solar USA is a legally established entity with its corporate headquarters located in the state of California, 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 32 staff throughout the year 2024. 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.

JA Solar USA has no own production or manufacturing and purchases 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 has its own production of silicon ingots, wafers, cells and photovoltaic modules. The photovoltaic modules sold and distributed by JA Solar USA in Canada and the USA during 2024 contain cells and silicon wafers mainly produced within JA Solar Group.

JA Solar Group fosters long-term relationships and ongoing collaboration with suppliers that share the commitment to eliminating all forms of forced labour and child labour, and encourages them to continuously improve their own social responsibility practices.



## **Approach to Forced Labour and Child Labour**

JA Solar USA and JA Solar Group acknowledge their responsibility in contributing to global efforts to combat forced labour and child labour. They follow internationally recognized labour and human rights standards, as outlined in key frameworks such as the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the United Nations Global Compact to which JA Solar Group is a signatory.

JA Solar USA and JA Solar Group are strongly committed to ensure that all their operations and complete supply chain are free from any form of forced labour and child labour. This commitment is embedded in their policies, procedures, and management systems. Several whistle-blowing channels are in place for both employees and external stakeholders to report concerns related to forced labour, child labour, and other risks.

JA Solar Group regularly informs its stakeholders on the efforts to protect human rights via the Sustainability and ESG Report<sup>1</sup>, which is available on JA Solar Group's website.

## **Policies and Due Diligence Procedures**

### ➤ **Policies**

To uphold the commitment to respecting human rights and eliminating forced labour and child labour risks, JA Solar Group has established and implemented a series of relevant policies. These policies have been formally approved by JA Solar Group's ESG & Compliance Management Committee. Key policies include:

- JA Solar Human Rights Policy
- JA Solar Responsible Sourcing Policy
- JA Solar Code of Conduct
- JA Solar Supplier Code of Conduct

Among these, the JA Solar Human Rights Policy and the JA Solar Responsible Sourcing Policy provide the overarching framework for identifying, preventing, mitigating and remediating risks related to forced labour, child labour and other risks across JA Solar Group's operations and supply chain.

The JA Solar Code of Conduct (the "**Code**") applies to all employees of JA Solar Group and its subsidiaries, including JA Solar USA. The Code explicitly prohibits any use of modern slavery, forced labour and child labour, and reinforces JA Solar Group's commitment to ethical and responsible business conduct. The JA Solar Supplier Code of Conduct (the "**Supplier Code**") applies to external photovoltaic suppliers of JA Solar Group and likewise prohibits forced labour and child labour. Suppliers are

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<sup>1</sup> For Chinese version, see <https://www.jasolar.com/index.php?m=content&c=index&a=lists&catid=743>;  
For English version, see <https://www.jasolar.com/index.php?m=content&c=index&a=lists&catid=748>



required to formally acknowledge and adhere to the Supplier Code, which constitutes an integral and legally binding component of JA Solar Group’s procurement agreements. Furthermore, suppliers are required to establish and maintain effective management systems to ensure ongoing compliance with the Supplier Code and are expected to cascade these standards throughout their own supply chains, including their suppliers and subcontractors. JA Solar Group reserves the right to terminate business relationships with suppliers that violate the Supplier Code.

Based on these Group-level policies, JA Solar Group’s production facilities have developed site-specific policies, such as the Labour Compliance Manual (the “**Manual**”). The Manual sets forth detailed requirements regarding the prohibition of forced labour, slavery, and human trafficking, as well as the prohibition of child labour and the corresponding remediation procedures.

➤ **Due Diligence Procedures**

• **JA Solar Group’s Operations**

JA Solar Group adopts the United Nations Guiding Principles on Business and Human Rights (UNGPs) as the foundation for its human rights framework.

The human rights due diligence process is designed to identify, prevent, mitigate, bring to an end and remediate adverse human rights impacts, including forced labour and child labour.

Human rights due diligence process



• **JA Solar Group’s Supply chain**

JA Solar Group follows internationally recognized frameworks, such as the OECD Due Diligence Guidance for Responsible Business Conduct, to guide its supply chain due diligence and monitor supplier compliance with its Supplier Code.

The first and fundamental step in its due diligence process is supply chain mapping, which enables it to gain visibility over its supply chain and identify risks. Following this, JA Solar Group adopts a risk-based approach to due diligence. Risk prioritization is carried out based on factors such as sector risks, product risks, geographic risk, and enterprise-level risk.

Through this process, JA Solar Group identifies prioritized suppliers and conducts enhanced due diligence using standardized assessment tools, such as supplier questionnaires and on-site audits.



JA Solar Group places strong emphasis on collaborative engagement with suppliers. Suppliers are required to develop and implement appropriate corrective action plans on identified non-conformities. JA Solar Group works with suppliers to evaluate the effectiveness of their actions to address forced labour and child labour risks. If a supplier refuses to cooperate, or if the adverse impacts of the non-conformities cannot be effectively mitigated or remedied, JA Solar Group will assess further actions, including the potential termination of the business relationship.

### **Risk Identification and Risk Management**

JA Solar USA is an entity with 32 employees which all are based in the USA and are engaged in the sales of photovoltaic modules. JA Solar USA's direct business operations are free from the risk of forced labour or child labour practices. 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 rigorous policies and controls in place. 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, particularly in upstream supply chains involving silicon mining activities.

#### **➤ JA Solar Group's Operations**

In 2024, JA Solar Group conducted the human rights due diligence. Forced labour, child labour and other related risks were identified as the prioritized issues for assessment. JA Solar Group evaluated potential risks based on two dimensions: severity and likelihood. For severity, factors considered include scale, scope, and remediability. These two dimensions formed the basis of the Human Rights Risk Assessment Matrix ("**Matrix**"). Using the Matrix, JA Solar Group categorized risks into different risk levels. For each identified prioritized issue, JA Solar Group reviewed the existing internal controls, management systems or processes to assess the residual risk—that is, the level of risk remaining after current mitigation measures are taken into account.

JA Solar Group's Compliance Team and one external worldwide outstanding law firm conducted due diligence processes separately through questionnaires, documents review and confidential employee interviews. The interviews including questions related to the International Labour Organization's (ILO) indicators of forced labour, as well as aspects of the recruitment process such as age verification. These interviews were designed to assess both the presence of forced and child labour risks and the effectiveness of current risk mitigation measures.

Based on this due diligence, JA Solar Group did not identify any use of forced labour or child labour.



## ➤ **JA Solar Group's Supply Chain**

JA Solar Group has identified suppliers with upstream supply chain involving silicon mining activities as high-priority, on account of silicon mining with more potential risks of forced labour and child labour.

As part of JA Solar Group's proactive engagement, these suppliers submitted responses to JA Solar's ESG-related questionnaires. The responses reflected their awareness, commitment, and relevant measures to labour compliance and social responsibility. Some suppliers voluntarily presented their current labour practices and social responsibility frameworks to JA Solar Group during on-site visit, demonstrating a willingness to continuous improvement. JA Solar, in turn, provided relevant guidance and industry practices to assist suppliers in further combating risks related to forced labour, child labour, and other human rights issues.

To further identify and address potential risks, the majority of these high-priority suppliers have undergone third-party compliance audits conducted by independent and professional auditing firms. The audit methodologies typically included on-site facility inspections, confidential worker and management interviews, and thorough documentation reviews. These procedures are designed to evaluate the existence and effectiveness of suppliers' management systems for identifying, preventing, and mitigating risks related to forced and child labour and their compliance with the Supplier Code.

Based on the results of these audits, no instances of forced labour or child labour were identified. Certain non-conformities mainly relating to the suppliers' management systems were observed. In response, JA Solar Group has encouraged these suppliers to undertake corrective actions aimed at strengthening their governance frameworks and enhancing risk controls.

The due diligence, and interactions and information from suppliers, third party auditors, customers and other stakeholders are continuously reviewed and used to reassess and monitor actual or potential adverse human rights impacts across JA Solar Group's operations and supply chain.

As of the end of 2024, JA Solar Group and JA Solar USA have not identified any instances of forced labour or child labour within their own operations or supply chains. Consequently, no remediation measures have been taken to remediate forced labour or child labour. Likewise, no measures have been taken to remediate the loss of income to the most vulnerable families that results from any measures taken to eliminate the use of forced labour or child labour.



### **Effectiveness of Risk Controls**

JA Solar Group continuously assesses the effectiveness of its risk control measures to ensure it remains resilient and responsive to the risks of forced labour and child labour. JA Solar Group's risk control framework encompasses a range of preventive and responsive measures, including but not limited to human rights risk assessments and due diligence, the incorporation of contractual obligations with suppliers, independent on-site audits conducted by credible third-party firms, accessible grievance mechanisms, and ongoing engagement with suppliers and relevant stakeholders.

In 2024, JA Solar Group's compliance management system—covering labour and employment compliance alongside other core compliance areas—underwent a comprehensive third-party audit in accordance with ISO 37301:2021 standards, and successfully obtained the certification. In addition, two facilities of JA Solar Group—Shanghai JA Solar Technology Co., Ltd. and JA (Yangzhou) New Energy Co., Ltd.—successfully underwent the ESG Assessment of the Solar Stewardship Initiative (“SSI”) and were awarded the ESG Standard Certification. This assessment was conducted by independent auditing firm, and covers human rights, labour rights, occupational health and safety, responsible sourcing and other compliance areas. These external validations contribute to its ongoing efforts to evaluate and enhance the effectiveness of the risk controls across its facilities and supply chain.

JA Solar Group expects its suppliers, employees, and other stakeholders to promptly report any potential instances of modern slavery upon becoming aware of them. To facilitate this, JA Solar Group has established comprehensive grievance mechanisms that are accessible to these parties. During the reporting period, there has been no incident, report or inquiry regarding forced labour or child labour. Should any such violations be identified, JA Solar Group would take swift and appropriate actions.

### **Training and Competence Building**

In 2024, JA Solar USA did not conduct targeted training sessions specifically addressing the topics of forced labour or child labour for its 32 employees. However, JA Solar Group has implemented a range of training sessions focused on these and other human rights risks, such as the trainings on responsible sourcing, human rights due diligence, and the SA8000 Standard.

While these trainings were not mandatory for employees of JA Solar USA, many personnel across the JA Solar Group — particularly those involved in procurement, supply chain management, and human resources — actively participated in these trainings. These efforts aim to strengthen internal awareness and reinforce the JA Solar Group's ability to identify, prevent, and respond to potential labour rights risks.

In addition, in May 2024, JA Solar Group organized an ESG compliance training workshop for key suppliers. The training covered key topics such as the prevention of



forced labour and child labour, and introduced practical tools, such as sample self-assessment questions related to labour risks identification. This initiative helps suppliers enhance their awareness and capabilities to combat forced labour and child labour.

### **Moving Forward**

Recognizing that combating forced labour and child labour risks is an ongoing commitment and process, JA Solar USA and JA Solar Group will strengthen their efforts across their operations and supply chain. In 2025, they will further expand the scope and depth of their supply chain due diligence, with a particular focus on suppliers with higher labour risk exposure. They will also intensify training initiatives to raise awareness among employees and supply chain partners about forced labour and child labour risks, and continue to improve their relevant policies and procedures to ensure effective risk prevention and mitigation..

### **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, 2025

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I have the authority to bind JA Solar USA Inc.