

**Modern Slavery and Human Trafficking
Statement
FY 2024**

**Approved by the Board of Directors
JA Solar GmbH
June 30, 2025**

JA SOLAR



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1. Introduction

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 on behalf of JA Solar GmbH (“**JA Solar Europe**”) for the financial year which ended on 31 December 2024. It was approved by the board of directors on 30 June 2025 and constitutes our modern slavery and human trafficking statement (the “**Statement**”).

In this Statement, “we” or “our” refer to JA Solar Europe and the wider JA Solar Group. Further details on our group structure and operations are provided in Section 2 below.

2. Corporate and Supply Chain Overview

2.1 Structure and Activities

JA Solar Europe 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. Headquartered in Beijing, China, JA Solar Group operates multiple manufacturing facilities worldwide and has 16 overseas sales offices, with a global workforce exceeding thirty thousand.

JA Solar Europe’s main business is the sale and distribution of photovoltaic modules in the UK and in the whole of Europe. The total number of personnel employed by JA Solar Europe stood at 88 by the end of 2024. JA Solar Europe does not control any other entities and no other entities are covered by this Statement.

2.2 Supply Chain

JA Solar Europe does not own production or manufacturing and purchases goods and services from different suppliers. All photovoltaic modules are directly purchased from other entities within JA Solar Group.

JA Solar Group, in turn, has its own production of silicon ingots, wafers, cells and photovoltaic modules. The supply chain entails the procurement of various components and raw materials, such as polysilicon. These materials and components are sourced by the JA Solar Group through suppliers and vendors that are mainly based in China, the United States and other countries as illustrated in the diagram below.



Diagram 1: JA Solar Group's Supply Chain



3. Approach to Combat Modern Slavery

JA Solar Europe and JA Solar Group do not tolerate any kind of slavery or any other form of involuntary servitude. We are strongly committed to ensuring that all our operations and complete supply chain are free from any form of forced labour, human trafficking and child labour.

We 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.

Our commitment against modern slavery is embedded in our policies, procedures, and management systems.

- A strict due diligence framework is applied across our operations and supply chain with respect to modern slavery as set out in this Statement.
- Several whistle-blowing channels are in place for both employees and external stakeholders to report concerns related to forced labour, human trafficking, child labour.

JA Solar Group regularly informs its stakeholders on the efforts to protect human rights via the Sustainability and ESG Report¹, which is available on JA Solar Group's website, and through other statements on its website².

¹ For the Sustainability and ESG Report, see <https://www.jasolar.com/index.php?m=content&c=index&a=lists&catid=748>

² For information related to traceability and supply chain due diligence, see <https://www.jasolar.com/index.php?m=content&c=index&a=lists&catid=763>



4. Governance, Policies and Procedures

4.1 Governance

JA Solar Group established the ESG & Compliance Management Committee (the “Committee”) to coordinate and oversee the Group’s sustainability and compliance programs, including those related to modern slavery. The Committee is composed of executive president and senior executives from key departments, such as legal & compliance, ESG, procurement, sales, manufacturing and delivery, human resources, and internal audit, and reports directly to the Board of Directors on material matters.

Under the leadership of this Committee, JA Solar Group implements and operates a multi-level compliance management framework, with key departments and local teams jointly responsible for enforcing policies and conducting due diligence in relation to modern slavery risks.

This governance structure helps ensuring both top-down oversight and bottom-up execution, and promote consistent and effective implementation of JA Solar Group’s commitment to eliminating modern slavery risks through its complete operations and supply chain.

4.2 Policies

JA Solar Group has established and implemented a series of relevant policies. The overarching Group-level policies have been formally approved by the Committee.

<u>Summary of Overarching Group-level Policies</u>	
✧ JA Solar Human Rights Policy	The Human Rights Policy establishes minimum requirements within JA Solar Group by instructing relevant departments on how to identify and how to deal with (potential or actual) adverse human rights impacts within its organization and in its supply chain. This Policy applies worldwide to JA Solar Group and all employees, contractors, directors and other third parties employed or engaged by, or providing services on behalf of JA Solar Group.
✧ JA Solar Responsible Sourcing Policy	The Responsible Sourcing Policy sets out the requirements for the sustainable procurement of goods and services and the supply chain due diligence management system.



<p>✧ JA Solar Code of Conduct</p>	<p>The JA Solar Code of Conduct (the “Code”) applies to all employees of JA Solar Group and its subsidiaries, including JA Solar Europe. The Code explicitly prohibits any use of modern slavery, forced labour, human trafficking and child labour, and reinforces JA Solar Group’s commitment to ethical and responsible business conduct.</p>
<p>✧ JA Solar Supplier Code of Conduct</p>	<p>The JA Solar Supplier Code of Conduct (the “Supplier Code”) applies to external photovoltaic suppliers of JA Solar Group and likewise prohibits forced labour, human trafficking and child labour. Suppliers are 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.</p> <p>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.</p>
<p>✧ JA Solar Conflict Minerals Management Policy</p>	<p>The JA Solar Conflict Minerals Management Policy sets out the Group’s commitment and due diligence framework related to conflict minerals. Although JA Solar Group does not directly mine or procure minerals, it recognizes its responsibility to respect human rights throughout the supply chain and to avoid contributing, directly or indirectly, to armed conflict, human rights abuses, or forced labor through its sourcing practices.</p>

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 the responsibilities of the facilities, and sets forth detailed compliance rules covering areas such as freely chosen employment, prohibition of forced labour, anti-slavery and anti-human trafficking, prohibition of child labour, and remedial procedures.

To further monitor compliance with the above and other relevant policies, as well as applicable laws, regulations and standards, JA Solar Group has issued the SpeakUp Policy and Procedure governing the grievance channel – the SpeakUp line. This policy sets out the internal procedures for raising, handling, and responding to concerns regarding malpractice or misconduct, including modern slavery risks, thereby



supporting the Group’s overall governance and compliance framework.

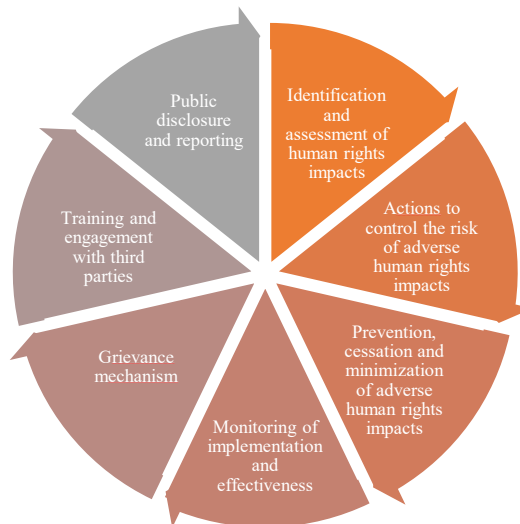
4.3 Due Diligence Procedures

4.3.1 Our Operations

JA Solar Group adopted 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 as outlined in the JA Solar Human Rights Policy is designed to identify, prevent, mitigate, bring-to-an-end and remediate adverse human rights impacts, including forced labour, human trafficking and child labour.

Diagram 2: Human Rights Due Diligence Process



4.3.2 Our Supply Chain

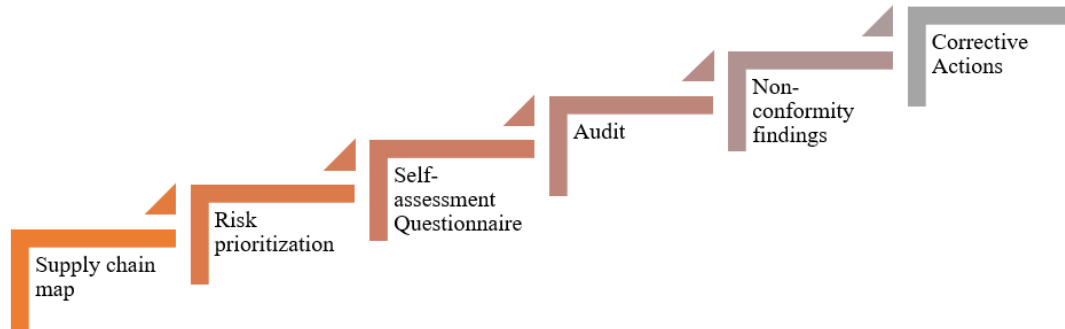
In particular, JA Solar Group follows the OECD Due Diligence Guidance for Responsible Business Conduct, to guide its supply chain due diligence and monitor supplier compliance with its Supplier Code, as reflected in the JA Solar Responsible Sourcing Policy.

The first step in JA Solar Group’s 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 risks, and enterprise-level risks.



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, either directly or through third parties.

Diagram 3: Supply Chain Due Diligence Process



Generally, 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, human trafficking and child labour risks. However, if a supplier refuses to cooperate, or if the adverse impacts of the non-conformities cannot be effectively mitigated or remedied, JA Solar Group does not hesitate to take decisive actions, including the potential termination of the business relationship.

5. Risk Identification and Risk Management

JA Solar Europe is an entity with 88 employees which all are based in Europe and are engaged in wholesale business of photovoltaic modules. JA Solar Europe’s direct business operations have a very low risk of forced labour, human trafficking and child labour due to its geographical location, type of business conducted and limited number of employees. JA Solar Europe’s direct suppliers are mainly entities within JA Solar Group that have a low risk of forced labour, human trafficking and child labour due to rigorous policies and controls in place. The area where JA Solar Europe faces potential risks of forced labour, human trafficking and child labour exploitation is indirect suppliers and vendors that make up JA Solar Europe’s extended supply chain network beyond its direct suppliers and contractors, particularly in upstream supply chains involving silicon mining activities.

5.1 Our Operations

In 2024, JA Solar Group conducted the human rights due diligence. Forced labour, human trafficking, 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 included 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, human trafficking 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, human trafficking or child labour within its operations.

5.2 Our Supply Chain

JA Solar Group 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, human trafficking and child labour.

These suppliers were required to submit self-assessment to JA Solar Group. The majority of these suppliers have also been subject to third-party audits in 2024. The audits typically included on-site facility inspections, confidential worker and management interviews, and thorough documentation reviews based on best practices.

Based on the results of these audits, no instances of forced labour, human trafficking or child labour were identified. However, 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.

5.3 Summary

In the financial year 2024, JA Solar Group did not identify any instances of forced labour, human trafficking or child labour within its own operations or supply chains, but the risk remains present given the complexity and size of JA Solar Group’s supply chain. Therefore, we remain committed and vigilant going forward.



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.

6. Training and Competence Building

We have a strong and dedicated culture of compliance. In 2024, all new employees of JA Solar Europe received a standard training on forced labor, human trafficking and the policies and processes to address these risks. In addition, JA Solar Europe conducted a series of comprehensive ESG trainings for its employees to create awareness of forced labor and other human rights risks and to build know-how on the internal processes and policies. The trainings covered topics such as supply chain due diligence, responsible sourcing, human rights and the underlying legal framework in in the UK and in Europe as a whole.

In parallel, 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. These trainings covered multiple departments and 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 the annual ESG compliance training workshop with external suppliers. The training covered key topics such as the prevention of forced labour, human trafficking 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 modern slavery.

7. 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, human trafficking 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 the ISO 37301:2021 standard and successfully obtained the certification.

JA Solar Group requires 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, human trafficking or child labour. Should any such violations be identified, JA Solar Group would take swift and appropriate actions.

8. Moving Forward

Recognizing that combating forced labour, human trafficking and child labour risks is an ongoing commitment and process, we will strengthen our efforts across the operations and supply chain. In 2025, we will take the following key actions as part of our broader and continuous improvement efforts:

Areas	Actions
SSI certification	In 2025, we are seeking to obtain additional SSI certifications. In early 2025, 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 an independent auditing firm, and covers human rights, labour rights, occupational health and safety, responsible sourcing and other compliance areas. These external validations contribute to JA Solar Group’s ongoing efforts to evaluate and enhance the effectiveness of the risk controls across its operations and supply chain.
Supply Chain Due Diligence	Continuing supply chain due diligence through risk assessments of suppliers, including self-assessment questionnaires and external audits as necessary, with a particular focus on suppliers with elevated levels of labour risk exposure.
Awareness and Training	Intensify and repeat training initiatives to raise awareness among employees and supply chain partners in relation to modern slavery risks.
Governance and Policy Refinement	Continue to improve relevant policies and procedures to ensure effective risk prevention and mitigation.



Zhu Daocheng

Director

June 30, 2025

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