

Modern Slavery and Human Trafficking Statement FY 2025

**Approved by the Board of Directors
JA Solar GmbH
June 29, 2026**

JA SOLAR



Table of Contents

1. Introduction.....2

2. Corporate and Supply Chain Overview2

 2.1 Structure and Activities2

 2.2 Supply Chain Overview2

3. Commitment to Combat Modern Slavery3

4. Governance, Policies and Procedures3

 4.1 Governance.....3

 4.2 Policies4

 4.3 Due Diligence Procedures5

5. Risk Assessment Process6

 5.1 JA Solar Europe.....6

 5.2 JA Solar Group’s Operations7

 5.3 JA Solar Group’s Supply Chain.....7

6. Remediation Measures.....8

7. Effectiveness of Risk Controls.....9

8. Training and Competence Building 10

9. Moving Forward 11



1. Introduction

This statement is made pursuant to section 54(1) of the *UK Modern Slavery Act 2015* (the “**Act**”) on behalf of JA Solar GmbH (“**JA Solar Europe**”) for the financial year which ended on 31 December 2025. It was approved by the board of directors on June 29, 2026 and constitutes our modern slavery and human trafficking statement (the “**Statement**”). This Statement outlines the measures taken by JA Solar Europe to prevent and mitigate the risk of modern slavery and human trafficking in its operations and supply chains.

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.

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 96 by the end of 2025. JA Solar Europe does not control any other entities and no other entities are covered by this Statement.

2.2 Supply Chain Overview

JA Solar Europe does not own or operate any production or manufacturing facilities. All of its photovoltaic modules, which constitute the primary component of its business operations, are procured directly from affiliated entities within JA Solar Group.

JA Solar Group operates an integrated manufacturing value chain covering the 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.



3. Commitment 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.

4. Governance, Policies and Procedures

4.1 Governance

JA Solar Group established the Compliance, Internal Control and ESG 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, finance, audit & supervision, human resources, and digital intelligence & process, and reports directly to the Board of Directors on material matters.

¹ For the Sustainability and ESG Report, see https://www.jasolar.com/uploadfile/publish/events/2025_JA_Sustainability_and_ESG_Report_EN.pdf

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=748>



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.
✧ JA Solar Code of Conduct	The JA Solar Code of Conduct (the “ Code ”) sets out the standards of ethical and compliant behavior expected from employees across JA Solar Group and its subsidiaries, including JA Solar Europe. The Code reinforces JA Solar Group's commitment to conducting business in a lawful, ethical and socially responsible manner, including the prohibition of modern slavery, forced labour and child labour.
✧ JA Solar Supplier Code of Conduct	The JA Solar Supplier Code of Conduct (the “ Supplier Code ”) applies to external photovoltaic suppliers of JA Solar Group and establishes expectations relating to human rights, labour rights, responsible sourcing and supply chain compliance. 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. Furthermore, suppliers are expected to implement appropriate management measures and promote these standards within their own supply chains, including to relevant subcontractors and business partners.
✧ JA Solar Conflict Minerals Management Policy	The JA Solar Conflict Minerals Management Policy was established to strengthen prohibition of forced labour, human trafficking and child labour relating to minerals originating from conflict-affected and high-risk areas (“CAHRAs”). JA Solar Group recognizes that irresponsible mineral sourcing practices in certain regions may be associated with heightened risks relating to human rights issues. The policy therefore supports supply chain transparency and responsible sourcing practices as part of JA Solar Group’s broader efforts to strengthen human rights due diligence across its supply chain.

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 prohibition of forced labour, anti-slavery and anti-human trafficking, prohibition of child labour, and the corresponding 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

JA Solar Group adopts the UNGPs as the foundation for its human rights framework, and follows internationally recognized frameworks, such as the OECD Due Diligence Guidance for Responsible Business Conduct, to guide its own operation, supply chain and other business relationship’s human rights due diligence.

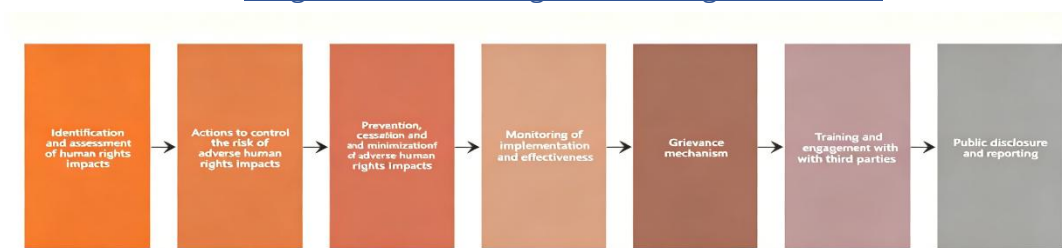
The human rights due diligence process as outlined in the JA Solar Human Rights Policy is designed to identify, prevent, mitigate, bring-to an end and remediate adverse



human rights impacts, including forced labour, human trafficking and child labour. The seven-stage due diligence process is shown in Diagram 1.

JA Solar Group systematically integrates the commitment to respect human rights and combat forced labour, human trafficking and child labour into policies and management systems. On this basis, JA Solar Group continuously identifies and assesses actual and potential human rights risks across its operations and value chains. For the risks identified, JA Solar Group takes appropriate measures to prevent, mitigate and cease adverse impacts, and dynamically tracks the implementation progress and effectiveness of due diligence activities to ensure that all measures are effectively carried out. At the same time, JA Solar Group communicates with internal and external stakeholders regarding the actions taken to address impacts, in order to enhance transparency. Where necessary, JA Solar Group provides or cooperates in remediation mechanisms to ensure that affected parties have access to effective remedy.

Diagram 1: Human Rights Due Diligence Process



5. Risk Assessment Process

The first and fundamental step in its human rights due diligence process is conducting a comprehensive scoping exercise and preliminary understanding its own operation and all business relationships. JA Solar Group gather information from several sources and adopt a risk-based approach to identify and assess potential high-level risks of adverse impacts related to its products and supply chains, services and other activities. Factors considered may include sector-specific risks, geographic risks, product-related risks, enterprise-specific risks and supplier-specific considerations.

5.1 JA Solar Europe

JA Solar Europe is an entity with 96 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.

5.2 JA Solar Group's Operations

In 2025, JA Solar Group conducted the human rights due diligence assessment. Forced labour, human trafficking, child labour and other human rights risk areas were selected as prioritised areas 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 and reviewed the existing internal controls, management systems and mitigation measures to assess the corresponding residual risks.

JA Solar Group conducts human rights risk assessment on selected pilot manufacturing facilities on an annual basis as part of its ongoing human rights due diligence efforts. In 2025, such assessments were conducted at several manufacturing facilities of JA Solar Group, including the Yangzhou, Fengxian and Yiwu sites in China. The assessments focused on identifying and evaluating potential risks relating to modern slavery, forced labour, child labour and equal employment practices.

Based on JA Solar Group's risk assessment methodology and existing control measures, the identified residual risks were assessed as low to medium risk. Low-risk findings are subject to ongoing monitoring and existing control measures, while medium-risk findings are addressed through enhanced mitigation and improvement measure.

For instance, during the assessment process, JA Solar Group identified that its Human Rights Policy could be further strengthened by enhancing the visibility of senior management commitment within the policy. The absence of an explicit management-level endorsement in the policy text could potentially reduce the clarity of governance accountability and external communication of the company's human rights commitment. In response, JA Solar Group updated the Human Rights Policy to include management-level approval and endorsement language to further reinforce its commitment to human rights and responsible business conduct.

5.3 JA Solar Group's Supply Chain

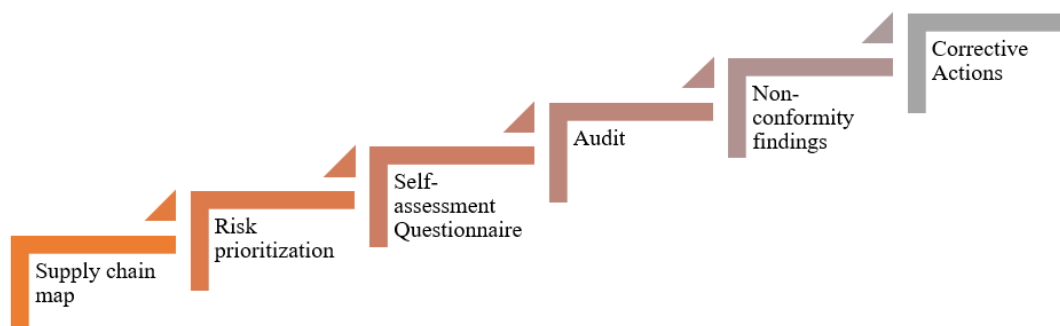
JA Solar Group's supply chain due diligence is governed by its Responsible Sourcing Policy, which sets out the requirements for sustainable procurement and due diligence management system. The Group also requires all external photovoltaic suppliers to adhere to its Supplier Code, a contractually binding document that establishes expectations on human rights, modern slavery and other compliance requirements.



Under this framework, the Group conducts ongoing due diligence by mapping its supply chain and performing risk screening to identify and prioritise suppliers, followed by enhanced assessments using standardized tools such as questionnaires and on-site audits, while maintaining supplier compliance monitoring throughout the entire process (the overall process is illustrated in Diagram 2).

Based on this risk-based prioritisation approach, and given that the mining sector is generally considered to present higher risks of modern slavery, forced labour, human trafficking and child labour from a human rights due diligence perspective, JA Solar Group has accordingly prioritised suppliers in the upstream silicon mining supply chain for enhanced due diligence and assessment in 2025, and conducted assessments for key suppliers within its photovoltaic material supplier chain. The assessment covered multiple dimensions, including specific sections on the management of modern slavery, forced labour and child labour risks. Under JA Solar Group's internal risk assessment criteria and scoring methodologies, suppliers would be categorized into low-, medium-, and high- risk priority levels, with corresponding follow-up measures implemented based on the assessment outcomes.

Diagram 2: Supply Chain Due Diligence Process



6. Remediation Measures

For JA Solar Group's operations, the Group took targeted remediation measures, such as updated Human Rights Policy to include management-level approval, strengthening governance accountability and external communication of its human rights commitment.

For supply chain management, collaborative communication with suppliers is central to JA Solar Group's risk governance. Once labour-related concerns are identified, suppliers are required to develop and implement tailored corrective action plans ("CAPs"). For small- and medium-sized enterprises ("SMEs"), JA Solar Group adopts a proportionate and risk-based remediation approach: instead of mandating on-site audits, it requests CAPs from these suppliers and provides remote assistance and



follow-up guidance to facilitate remediation efforts.

This year, during the assessment process, JA Solar Group identified that several SMEs suppliers had not put in place adequate requirements for their upstream suppliers to align with modern slavery, forced labour and related labour rights requirements. In response, JA Solar Group proactively engaged with the relevant suppliers and encouraged them to strengthen compliance management requirements and contractual controls applicable to their own upstream supply chains.

As part of its ongoing monitoring, the Group works with suppliers to evaluate the effectiveness of their actions in mitigating risks related to forced labour, human trafficking, and child labour. The Group reserves the right to suspend or terminate business relationships in cases of non-cooperation or failure to complete remediation measures.

As of the end of 2025, neither JA Solar Group nor JA Solar Europe has identified any instances of forced labour, human trafficking or child labour within its own operations or supply chains. Accordingly, no remediation measures in response to such actual instances, no measures have been taken to remediate income loss to the most vulnerable families that results from any actions taken to eliminate forced labour or child labour.

7. Effectiveness of Risk Controls

JA Solar Group continuously evaluates and improves the effectiveness of its measures for preventing and mitigating forced labour, human trafficking and child labour risks across its operations and supply chain. These measures include human rights due diligence, supplier engagement, contractual compliance requirements, grievance mechanisms, corrective action follow-up processes, and independent third-party assessments.

In 2025, JA Solar Group maintained its compliance management system certifications under ISO 37301:2021, which covers labour and employment compliance alongside other core compliance areas. Several facilities of JA Solar Group, have obtained SA8000 Social Accountability Management System Certification, these certifications support the implementation of labour and human rights protections, across relevant operations. In addition, certain manufacturing facilities of JA Solar Group underwent independent third-party ESG and labour-related assessments covering areas such as human rights, labour practices, occupational health and safety, responsible sourcing and compliance management. Relevant facilities also underwent labour and social compliance audits requested by customers during the reporting period.

As part of its ongoing human rights due diligence efforts, JA Solar Group also conducts confidential employee interviews during its risk assessment on selected pilot



manufacturing facilities. These interviews include questions relating to modern slavery indicators, recruitment practices, working conditions. During the reporting period, JA Solar Group did not receive negative employee feedback or identify concerns relating to forced labour, human trafficking or child labour through these interview processes.

JA Solar Group also continues to integrate labour-rights-related indicators into its supplier performance evaluation framework. Suppliers demonstrating strong ESG performance — including participation in labour management systems, third-party ESG audits, SA8000 certification and RBA assessments — may receive positive consideration in supplier performance evaluations and business cooperation opportunities.

JA Solar Group expects its suppliers, employees, and other stakeholders to promptly report any potential concerns relating to forced labour, child labour or other modern slavery issues through available grievance channels. During the reporting period, JA Solar Group did not receive any substantiated reports, inquiries or identified incidents relating to forced labour, human trafficking or child labour through its grievance mechanisms or other reporting channels.

Based on the due diligence activities, assessments, employee interviews, audits, and grievance mechanisms described above, JA Solar Group did not identify any instances of forced labour, human trafficking or child labour within its operation or supply chain during the reporting period.

These measures support JA Solar Group's ongoing efforts to strengthen responsible support sourcing practices and enhance the effectiveness of its forced labour, human trafficking and child labour risk controls. Should any such concerns arise, JA Solar Group would take appropriate follow-up and remediation measures in accordance with its policies and procedures.

8. Training and Competence Building

We have a strong and dedicated culture of compliance. Throughout 2025 all JA Solar Europe employees receive ongoing trainings which cover the topics of forced labor, human trafficking and the policies and processes to address these risks. In 2025, 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 continued to strengthen group-level human rights training initiatives addressing modern slavery, forced labour and child labour. These trainings



covered multiple departments and this broad engagement has proven instrumental in enhancing awareness and strengthening capabilities related to labour rights risk management.

In addition, JA Solar Group delivered targeted training sessions for its supply chain partners to reinforce their understanding and competence in labour rights compliance. Two online training sessions were organized for suppliers connected to the headquarters procurement system, covering topics including human rights, modern slavery and associated risks such as forced labour and child labour. A total of 425 suppliers participated in these sessions, including suppliers of silicon materials, solar cells, auxiliary materials and energy storage products.

JA Solar Group recognizes that training and capacity-building are essential components in preventing and mitigating forced labour, human trafficking and child labour risks throughout the supply chain.

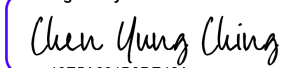
9. Moving Forward

Recognizing that the prevention of forced labour, human trafficking and child labour requires ongoing commitment and continuous improvement, we will continue to strengthen our human rights due diligence and responsible practices across our operations and supply chain in 2026. Particular focus will be placed on further enhancing supply chain transparency, strengthening supplier assessment and corrective action follow-up mechanisms, and expanding human rights-related training and awareness initiatives throughout the supply chain. In addition, we will continue improving the effectiveness of our compliance management system and risk management processes to support the identification, assessment, prevention and mitigation of potential forced labour and child labour risks across our operations and supply chain.

Chen Yung-Ching

Director

June 29, 2026

Signed by:

46E5A691B3DE42A...