



Trinasolar Co., Ltd

Anti-bribery Compliance Management Policy

Leading Dep.: Risk Control Management

Supportive Dep.: Internal Audit/Legal/HR

Approval: GRC

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As a global leader in photovoltaic technology innovation and product manufacturing, Trina Solar has always maintained high ethical standards and has firmly rejected any form of bribery in its global business operation. Trina Solar has established a robust internal control and supervision system designed to guide the company towards a path of greater transparency, fairness, and sustainable development, and aims to foster a fair and transparent business environment collaboratively.

1. Purpose

In order to regulate the employee conduct, prevent bribery from occurring and protect the legitimate interests of the Company, shareholders, employees and other relevant parties, further enhancing the level of corporate governance and compliance management in the area of anti-bribery, and promoting the sustainable and high-quality development of the Company, the Company develops this Policy ("Policy") in accordance with the Criminal Law of the People's Republic of China and the Anti-Unfair Competition Law, and similar laws and regulations applicable to the Company and its employees in other jurisdictions (including, but not limited to, the U.S. Foreign Corrupt Practices Act, the U.K. Anti-Bribery Act, and France Sapin II law, etc.) and the Trina Solar Compliance Management System, taking into account the actual situation of the Company's management of anti-bribery.

2. Scope

This policy applies to Trina Solar Co., Ltd. and all its wholly-owned and non-wholly-owned subsidiaries and branches (collectively, the "Company"), including but not limited to the research and development, production and sales of photovoltaic crystal pulling and slicing, photovoltaic cell modules, energy storage products and support products, photovoltaic power stations and smart energy solutions, photovoltaic power generation and operation and maintenance services. The participating companies are encouraged to implement this policy by reference.

2. Management

3.1 Fundamental Policy and Purpose of Anti-Bribery Compliance Management

3.1.1 Fundamental Policy on Anti-Bribery Management

Governance Enhancement, Strengthening the Anti-Bribery Defense Line

The Company is committed to enhancing its governance structure and system for authority and responsibility management, while establishing and refining the organizational framework for anti-bribery compliance management, and building a "three lines of defense" for anti-bribery management. It continuously optimizes its authorization mechanisms and strengthens the effectiveness of internal control and supervision. At the same time, it encourages employees and partners to actively report instances of bribery and corruption, ensuring the robust operation of the Anti-bribery Management System and creating a solid defense against bribery.

Compliance in Operations, Strictly Prohibiting Bribery and Acceptance of Bribes

The Company is committed to strict compliance with the laws and regulations of the countries or regions in which it operates, as well as its own internal rules and policies. Employees, as well as any individual or entity acting on the Company's behalf (including but not limited to representatives, agents, consultants, and other individuals or entities employed by or working on behalf of the Company), are strictly prohibited from attempting to secure business opportunities through bribery. Failure to comply with this policy may result in criminal liability (including fines and imprisonment) for the individuals involved, as well as disciplinary action taken by the Company (including potential termination of employment and forfeiture of income or benefits).

Steady Development, Preventing Bribery Risks

In the course of its operation, the Company comprehensively identifies, assesses, and takes effective measures to prevent and mitigate Bribery Risks, ensuring its steady progress. Through effective anti-bribery management, the Company can establish long-term stable business relationships and avoid compromising its long-term growth for short-term gains, thereby achieving sustainable development.

Value Creation, Cultivating an Anti-Bribery Culture

The Company continuously improves its Anti-bribery Management System, with a focus on enhancing international competitiveness and creating value. We prioritize strengthening the management capabilities of the organization and ensuring the independence of compliance functions, while cultivating an anti-bribery culture. By establishing and implementing an Anti-bribery Management System, the Company demonstrates its commitment to ethical practices and legal integrity to strengthen public and partners trust and open up to greater business opportunities.

3.1.2 Anti-Bribery Management Objectives

Improve the Level of Anti-Bribery Compliance Management

The Company shall consolidate the "three lines of defense" for the Anti-bribery Compliance Management System, effectively carry out anti-bribery compliance risk control, establish and improve anti-bribery systems and operational supervision systems, and update anti-bribery objectives in a timely manner.

Comply with Anti-Bribery Laws and Regulations and Company Rules

The Company shall not incur significant losses (including fines, compensations, late fees, etc.) due to violations of anti-bribery laws and regulations, industry standards and internal rules and regulations.

Protect Corporate Reputation and Brand Value

The Company shall cultivate and form an anti-bribery culture, and shall not trigger major negative public opinions due to bribery.

3.2 Anti-Bribery Management Key Areas

3.2.1 General Principles

All employees of the Company shall strictly abide by the Company's compliance system when conducting business activities, and ensure that their actions do not touch the following four red lines:

- 1) It is prohibited to offer, promise, give, authorize, direct or indirect, to give money or anything else of value (such as gifts, hospitality, travel, commercial sponsorship, charitable donations, job opportunities, facilitation payments, business contracts, etc.) to any person in the public sector or private enterprise with unduly influencing the recipient's proper duties or conduct, to obtain or maintain other improper benefits in business;
- 2) It is prohibited to provide false information or materials to conceal the true source or use of relevant payments, resulting in inconsistencies between accounts and facts;
- 3) It is prohibited to circumvent compliance management by fabricating or concealing facts, falsifying materials or other fraudulent acts, invalidating the compliance management system;
- 4) It is prohibited to carry out business with prohibitive compliance risk signals, or to engage in business with strict control or restrictive compliance risk signals without implementing an effective compliance control plan.

3.2.2 Key Scenarios

The Company shall strengthen anti-bribery compliance management in the following key scenarios:

- 1) **Gifts and Hospitality:** Employees may offer/accept gifts and hospitality only to the extent permitted by local laws and regulations and Company policy, and shall not offer any form of benefit to any person for the purpose of obtaining or retaining business opportunities or favors for the Company, nor shall they accept gifts and hospitality that would or could influence their business judgment, or be used to obtain a trading

opportunity/competitive advantage or an improper benefit.

- 2) **Business Partners:** Business Partners include customers, joint ventures, suppliers, distributors, consultants, representatives and others. The Company's co-operation with its Business Partners shall be genuine and legal, and any act of bribery through or in collusion with third parties is prohibited.
- 3) **Conference (organizing/participating):** The Company prohibits false or improper meeting expenses and employees are not allowed to commit bribery under the guise of organizing/participating in meetings.
- 4) **Inviting Individuals to Provide Services:** The Company inviting individuals to provide training, product promotion, product endorsement, consultancy and other services should be in line with the real, good faith, reasonable purpose. Prohibit bribery in the name of inviting individuals to provide services to actually give benefits out of a private nature.
- 5) **Distribution Activities:** The Company shall conduct business with distributors in accordance with the principle of fair competition, and any act of bribery through or in collusion with distributors is prohibited.
- 6) **Charitable Donations:** The Company strictly prohibits linking charitable donations to the acquisition of commercial benefits, and employees are not allowed to commit acts of bribery under the guise of donations to seek trading opportunities or competitive advantage/improper benefits for the Company.
- 7) **Commercial Sponsorship:** The Company strictly prohibits the provision of financial or in-kind support to a customer under the guise of sponsorship in order to commit an act of bribery for the purpose of obtaining a trading opportunity or competitive advantage/improper advantage.
- 8) **Employment:** The Company prohibits offering positions, part-time jobs, rehiring, and other similar job opportunities or benefits—such as promotions, training, and allowances—to individuals who are considered at high risk for bribery. This includes current, former, or retired government officials and their close family members or associates; current, former, or retired employees of customers and their close family members or associates; as well as individuals who have internal or external conflicts of interest with the Company.
- 9) **Mergers and Acquisitions and Joint Ventures:** The Company is prohibited from abetting or assisting the target company or the joint venture partner in obtaining any benefits, including governmental approvals or licenses, through bribery, before, during and after the investment, or providing financial support for the above-suspected bribery activities under any name.
- 10) **Others:** The Company strictly prohibits the political donations of any kind to candidates or governmental officials running for political office. The Company is also prohibited from making any cash or non-cash payments of facilitation or 'acceleration fees', and from making any facilitation or 'acceleration fee' payments through a Business Partner.

The requirements for the compliance management of such key scenarios are specified in the Trina Solar Anti-Bribery Compliance Management Implementation Rules.

3.3 Anti-bribery Control Measures

3.3.1 Due Diligence

The Company shall conduct anti-bribery due diligence on medium and high Bribery Risks which are identified and assessed, including but not limited to:

- 1) The transaction, project, or behavior falls into the key scenario;
- 2) Business partners involved in key scenarios;
- 3) Relevant personnel involved in medium and high Bribery Risks.

3.3.2 Financial Controls

The Company shall conduct anti-bribery compliance management of financial transactions to ensure that transactions are accurate, complete and recorded in a timely manner.

3.3.3 Non-financial Controls

The Company shall implement non-financial control measures related to Bribery Risks in the fields of procurement, operations, sales, commerce, human resources, etc., including but not limited to:

- 1) Pre-qualification of business partners such as contractors, subcontractors, suppliers and consultants;
- 2) Assess the necessity and legality of the services provided by the Business Partner, the performance and the reasonableness and legitimacy of the payment;
- 3) Preferential use of competitive bidding to sign contracts;
- 4) Separation of duties of incompatible positions shall be adopted in the contract approval process, which means contract initiation, management and acceptance should be carried out by different personnel.

3.4 Whistleblowing, Investigation and Disciplinary Measures

3.4.1 If you find anyone is suspected of, or has breached this Policy, please report it through the following channels:

- Hotline: +86 519 8517 6933
- Email: IA@trinasolar.com
- Website: Login to Trina Solar's official website (<http://www.trinasolar.com>) ---- click "Report and Complaint" in the upper right corner ---- enter the whistleblowing platform to report and complain, or you can directly enter <http://wb.trinasolar.com:8090/RCPFM/Trinasolar/report> to submit a whistleblower complaint.
- QR code for whistleblowing platform



3.4.2 The Audit and Supervision Department will investigate the relevant reports, ensuring strict confidentiality for whistleblowers and preventing any threats or retaliation against them.

3.4.3 For those who violate the Company's anti-bribery compliance requirements, Trina Solar will pursue responsibility under the Compliance Management System and the Trina Solar Regulations for Punishment of Employee Misconduct and Violations, and other company rules and regulations. If necessary, it shall be referred to the judicial authorities by the Company.

4. Appendix

4.1 Revision record

Doc#	Version	Responsible Person/Dep.	Effective date	Description
TSC-LA-005	V01	Legal Department	2021-09-26	/
TSL-CM-013	V01	Risk Control Management	2024-11-15	New version release

4.2 Validity period

This policy is drafted and will be explained and revised by Risk Control Management department. It is active in two years ever since it is published.