

# Trinasolar

天合光能

## Trinasolar Co., Ltd Circular Economy Policy

Leading Dep.: Compliance management

Supportive Dep.: EHS、CMBU Product management、  
Storage energy management

Approval: EMT

Doc#: TSL-CM-011

Effective date: 2024-10-08

## 1. Purpose

This Policy is intended to promote resource efficiency, reduce adverse impacts on environment, and operationalize our sustainable development vision. It is designed to align with global and national initiatives on circular economy practices, aiming to ensure resource recycling and environmental conservation.

The policy takes into account the "Law of the People's Republic of China Circular Economy Promotion", the "Guiding Opinions of the State Council on Accelerating the Establishment and Improvement of a Green, Low-Carbon and Circular Development Economic System", the "14th Five-Year Plan- Circular Economy Development Plan, " and the "Opinions of the State Council on Accelerating the Comprehensive Green Transformation of Economic and Social Development," as well as all applicable circular economy laws and regulations in the countries or regions where we conduct business.

## 2. Scope

This Policy applies to Trinasolar Co., Ltd. and all its domestic and overseas holding subsidiaries (hereinafter referred to as the "the Company"). The Company encourages all partners and stakeholders to follow the principles embodied in this policy and jointly drive forward the circular economy development.

## 3. Management methods

### 3.1 Circular Economy Governance

- a) The Company is deeply aware of the importance of a circular economy to achieve sustainable development goals. We are dedicated to reducing our ecological impact by optimizing resource use, minimizing waste, and driving the high-quality growth of our operations and value chain. The Company adheres to the principle of reduce, reuse, and recycle. We are continually enhancing our circular economy management systems.
- b) The Company's ESG management committee, ESG working group, and relevant organizational departments are tasked with setting circular economy management goals, which is achieved by taking corrective measures after periodical evaluation to each business unit's performance on circular economy.
- c) The Company integrates circular economy risks and opportunities into the risk management framework. This includes identifying and analyzing the potential impact of material and product cycles. Improvement

advices are proposed based on the analysis.

- d) The Company conveys its circular economy policies and strategies to all stakeholders, including regulators, customers, employees, and suppliers. We actively collaborate in resource recycling and waste management to foster circularity across the product life cycle.

## **3.2 Circular Economy Collaborative Management Measures**

### **3.2.1 Product Design**

- a) The Company adheres to circular economy principles in product design, systematically considering the impact on resources and the environment at every stage, including raw material selection, production, distribution, utilization, recycling, and disposal. Harmful raw materials are minimized or avoided whenever possible.
- b) The Company comprehensively implements green industrial product design throughout the entire operation process, improving product durability and extending product lifespan. We develop high-performance, high-quality, green, low-carbon, and environmentally friendly photovoltaic products to enhance product circularity.
- c) The Company considers the use of recyclable, renewable, and recycled materials. Priority is given to recyclable and renewable raw materials, and a certain proportion of recycled materials used according to relevant regulations. Above measures ensure that product circularity design complies with applicable requirements in the company's operational locations and product markets.
- d) The company continually improves product design by conducting life cycle assessments to evaluate the environmental impact of products.

### **3.3.2 Supply Chain Management**

- a) The Company adheres to the circular economy principle in its procurement process, aiming to reduce waste generation. It encourages the use of recyclable, renewable, regenerated, and environmentally friendly raw materials and products.
- b) The Company communicates circular economy goals to suppliers, encouraging them to implement circular economy measures, including improving material use efficiency and reducing waste generation.

- c) The Company collaborates with supply chain partners to optimize supply chain management, enhance supply chain transparency, and identify opportunities to improve material recycling rates. We also aim to increase logistics and operational efficiency, promoting circular practices throughout the supply chain.
- d) The Company regularly reviews circular economy practices within the supply chain to ensure that all aspects comply with the requirements of the Company's policies.

### **3.3.3 Production and Operations**

- a) The company optimizes production processes to reduce the use of raw materials and energy. Energy-saving and water-conservation measures are implemented, promoting the resource utilization of industrial residual pressure, residual heat, wastewater, waste gas, and waste liquid, thereby reducing resource consumption and waste generation during the production process.
- b) The Company establishes waste management goals both at the production and operation level, planning to achieve "zero landfill" for waste by 2030.
- c) The Company formulates regulations for the circular use of product materials, clearly defining the utilization and management processes for recycled materials. It specifies technical indicators and documentation requirements for material recycling, thereby increasing the utilization rate of product materials and reducing greenhouse gas emissions and pollutant discharges throughout the product life cycle.
- d) The Company establishes and implements waste management procedures, strictly supervising and managing the reporting, generation, collection, classification, storage, transfer, and disposal of waste. The above measures ensure standardized handling of waste generated during production and operation processes, avoiding environmental pollution caused by waste.

### **3.3.4 Recycling and re-use**

- a) Attaching great importance to the environmental impact of end-of-life products, the Company conducts environmental impact assessments for end-of-life products and formulates compliant disposal methods to minimize environmental pollution.
- b) The Company formulates product recovery plans for recycling and reusing defective and waste products, and ensures that the product recycling efficiency and material recovery rate comply with regulatory

requirements of its operating location and product market.

- c) The Company continues to conduct research related to product recycling, focusing on the latest developments in product recycling policies, technologies, markets, industries, standards, patents, and other aspects.
- d) The Company tracks and recycles product packaging materials promptly, establishing and implementing an integrated recycling process for packaging material across production, warehouse, and procurement. Recycled categories include cardboard boxes, paperboard, wooden boards, plastic tubes, welding belt packaging materials, battery sheet packaging materials, glass iron pallets, etc.

### 3.3 Energy Storage Product Lifecycle Management

- a) The Company attaches great importance to energy storage product lifecycle management, in accordance with the applicable law and regulation of the operating location and market where energy storage products are sold. By taking various of compliant management measures, the Company ensures that energy storage products meet the requirements of the EU Battery and Waste Battery Directive and related product circular economy regulations.
- b) During the design phase of energy storage products, the Company ensures that product durability and electrochemical performance comply with regulatory requirements.
- c) The Company fulfills the extended producer responsibility obligations, promotes the construction of waste battery material recycling systems, and improves the material recovery rate.
- d) For key raw materials (such as nickel, cobalt, lithium, and lead) used in energy storage products the Company advances the disclosure of the recycled material proportions in accordance with relevant law and regulation timelines. The Company also sets targets for raw material recovery ratios and product recycled material usage ratios that comply with relevant requirements.

## 4 Appendix

### 4.1 Revision record

Doc#	Version	Responsible Person/Dep.	Effective date	Description
TSL-CM-011	V01	Shenwei Tong/Compliance management	2024-10-08	New version release

### 4.2 Validity period

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

## 5 Attachment

NA