



Trinasolar Global Human Rights Principles

天合光能全球人权原则

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Trinasolar Global Human Rights Principles

Our Commitments

Human rights are inherent to all people, regardless of nationality, sex, national or ethnic origin, color, religion, language or any other status. These rights range from the most fundamental, the right to life to those that make life worth living, such as the rights to food, education, work, and health. Trinasolar is committed to respecting human rights by ensuring a safe working environment, providing fair compensation, and addressing both the physical and mental well-being of our employees. We also respect the human rights of all our stakeholders—including employees, customers, suppliers, communities, and industry associations—by maintaining open and effective communication, and by responding to their concerns and needs. We pledge to uphold internationally recognized human rights principles throughout our operations and value chain, including Universal Declaration of Human Rights, United Nations Global Compact (UNGC), UN Guiding Principles on Business and Human Rights, International Bill of Human Rights, International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and the laws of the countries in which we operate. We are committed to incorporating these universal human rights principles into our strategies, policies and procedures, and establishing a culture of integrity, so as to set up a stage for our long-term success.

Trinasolar has established an integrated management system to manage human rights issues across our businesses. We are committed to maintaining and improving the management system to avoid any potential risks of human rights violations. We apply the following policies, regulations, and procedures to comply with the global human rights principles and to prevent any potential infringements of human rights resulting from our activities, products, or any activities in our supply chain:

- 1) Employee Handbook
- 2) Environment, Occupational Health & Safety (EHS) and Energy Management Policy
- 3) Product Stewardship Policy
- 4) Code of Social Responsibility Management
- 5) Code of Business Conduct and Ethics
- 6) Supply Chain Due Diligence Manual and Supplier ESG commitment
- 7) Conflict Minerals Management Policy
- 8) EHS Management System & CSR Internal Audit Management Procedure
- 9) Whistleblowing Policy

Trinasolar regularly assesses human rights related risks and potential impacts. We conduct periodically review on the global human rights principles, and update our policies, regulations, and procedures accordingly, so as to drive for continuous improvement for human rights performance.

Scope

This policy, as part of our management framework, applies to Trinasolar and all of its wholly-owned and non-wholly-owned subsidiaries, as well as branches (hereinafter collectively referred to as the “Company”). We encourage our partners and other relevant parties to adhere to the principles embodied in this policy and to develop and implement similar policies.

Our Principles

People are essential for the success of Trinasolar. Trinasolar is committed to providing a decent workplace for employees, suppliers, and other stakeholders. We believe in integrity and responsibility in our actions. We pledge to conduct our business in such ways that meet the universal requirements in the areas of Environment, Social and Governance (ESG) responsibilities. Trinasolar set ups the following global human rights principles to express its commitment to global human rights:

- 1) **Prevention of Human Trafficking, Forced Labor, and Child Labor:** Trinasolar will not use or tolerate the use of

forced, debt bonded, indentured labor, involuntary prison labor, slavery, or human trafficking in its business or supply chain. We continuously keep vigilant in our commitment to safeguard workers' rights in global supply chain. We forbid harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. Also, Trinasolar will not employ child labors and has implemented measures to prevent its occurrence. We have established mechanisms for addressing and remediating instances of child labor. Workers under the age of 18 are not permitted to perform hazardous work or engage in work that is unsuitable for their personal development and well-being.

- 2) **Working Hours and Minimum Wage Standards:** Trinasolar practices working hour system that is not to exceed the maximum set by local law or no more than 60 hours per week, whichever is stricter. Workers should not work longer than 6 consecutive days without at least one day off. Trinasolar pays employee compensation which meets, as minimum, or exceeds the requirements of applicable law, including those related to minimum wages, overtimes, and legally mandated benefits. Trinasolar is dedicated to enhancing employee benefits to meet their essential needs.
- 3) **Responsibility in Supply Chain:** As embodied in Supply Chain Due Diligence Manual, Supplier ESG commitment and Conflict Minerals Management Policy , Trinasolar communicates these human rights principles to suppliers and their upstream partners through supply chain due diligence management. We require suppliers to set up and maintain fair employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and regulations and to extend these requirements to their own upstream partners. We place a high priority on conflict minerals, implementing a traceability system for materials. In collaboration with our suppliers, we employ responsible sourcing practices to reject minerals that are mined through human rights abuses, environmental destruction, or violence, thereby promoting sustainable development.
- 4) **Environment Stewardship:** Trinasolar adopts a precautionary approach to the materials used in our products. We strive to conserve energy, water and other natural resources, and work to reduce the environmental impact of waste generation and emissions to air, water, and land. Our commitment to environmental stewardship is embodied in Trinasolar's Environment, Occupational Health & Safety (EHS) and Energy Management policy. Trinasolar continuously keeps vigilant in its commitment to safeguard environment stewardship in its global supply chain.
- 5) **Workplace Safety:** Trinasolar is committed to providing a healthy and safe workplace for its employees, contractors, and communities. We seek to provide a secure business environment for the protection of our employees, products, materials, equipment, and information. We strive to comply with all applicable regulatory requirements as a minimum, and implement programs and processes to achieve greater protection, where appropriate.
- 6) **Product Liability:** Trinasolar engages in Photovoltaic (PV) products, PV systems and smart energy. As the range of products and services we offer broadens and changes, we evaluate potential concerns about how technology products may be used to infringe on human rights. The challenges include environment health and safety (EHS) concerns that may arise from R&D, manufacturing, transportation, use and end-of-life product disposal. We have Product Stewardship Policy in place to ensure product safety and environmental protection throughout the product life span.
- 7) **Diversity and Nondiscrimination:** Trinasolar values diversity, equity and inclusion in our workforce, as well as in our customers, suppliers, and other stakeholders. We provide equal employment opportunity for all applicants and employees, adhering to the principle of equal pay for equal work. We do not discriminate on the basis of race, nationality, national origin, color, religious creed, gender, age, physical or mental disability, marital status, fertility status, political affiliation, sexual affiliation or any other characteristic protected by local law, regulation or ordinance.
- 8) **Harassment and Abuse Prohibition:** Trinasolar employees are required to treat co-workers, customers, and suppliers with dignity. Trinasolar is committed to providing a workplace free of harassment and abuse. We do not tolerate either harassment behavior or any other forms of violence or abuse.
- 9) **Freedom of Association and Collective Bargaining:** Freedom of association is the right of workers to freely form and join workers' organizations such as labor union, and worker committee for the promotion and defense of occupational interests. Collective bargaining is the negotiation of wages and other conditions of

employment by an organized body of employees. Trinasolar respects employees' rights to freely assemble, join unions, and engage in collective bargaining in accordance with local laws. We are committed to treating our employees with dignity and respect and striving to create an environment of open communication where employees can freely speak with their managers about their ideas, concerns or problems. We encourage our employees to share their ideas, concerns, or suggestions through an environment of cooperation and teamwork.

- 10) Privacy and Freedom of Expression:** Privacy and freedom of expression are mutually reinforcing rights. Trinasolar is committed to the right of privacy. We seek to protect against any unauthorized access, use, destruction, modification, or disclosure of company data information and personal information. Freedom of expression is fundamental to diverse cultural expression, creativity and innovation as well as the development of one's personality through self-expression. Trinasolar encourages employees to provide suggestions or opinions to help the company improve its management efficiency. Trinasolar setups grievance mechanism by providing various channels, including email, hotline, suggestion boxes, online platforms etc., to enable employees, suppliers and other external stakeholders to report any concerns in the workplace.

Grievances and Reporting

To gather and address concerns from all parties, Trinasolar has established a grievance and reporting mechanism. Employees, suppliers, business partners, customers, and other stakeholders can provide feedback or report incidents related to human rights violations or concerns through various channels, including phone, email, and physical mail, either anonymously or with their identity disclosed. We will investigate these reports in accordance with our Reporting Management Policy and provide timely follow-up feedback. Additionally, we will ensure the confidentiality of the whistleblower's information to protect them from retaliation.

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天合光能全球人权原则

我们的承诺

人权是所有人出生即有的权利，它不分国籍、性别、民族或种族出身、肤色、宗教、语言或任何其他身份地位。它包括最基础的生命权和选择自由生活的权利（如食物权、教育权、工作权、健康权等）。天合光能承诺尊重人权，除了为员工提供安全的工作环境、合理的薪酬，满足员工身体和心理健康的需求；我们同时尊重所有利益相关方的人权（包括但不限于员工、客户、供应商、社区、行业协会等），保持与各利益相关方的顺畅沟通，接收、理解、回应各利益相关方诉求。天合光能承诺在我们的运营和整个价值链中尊重国际公认的人权原则，包括《世界人权宣言》、《联合国全球契约(UNGC)》、《联合国工商业与人权指导原则》、《国际人权宪章》、国际劳工组织《关于工作中基本原则和权利宣言》、《经济合作与发展组织跨国企业准则》以及我们运营所在国家的法律。我们承诺将公认的人权原则融入我们的战略和政策中，建立诚信文化，为公司的可持续发展奠定基础。

天合光能建立了一套完善的管理体系，以有效地管理我们业务中的人权事宜。我们承诺维护和持续改进我们的管理体系，以避免侵犯人权的潜在风险。我们制定了以下政策和制度，以防范因我们的经营活动、产品或供应链而导致任何潜在的侵犯人权行为：

- 1) 员工手册
- 2) 环境、职业健康安全、能源管理方针
- 3) 产品监管政策
- 4) 社会责任管理规范
- 5) 员工商业行为和道德规范
- 6) 供应链尽职调查体系手册及供应商社会责任承诺书
- 7) 冲突矿产管理制度
- 8) EHS管理体系和CSR内部审核管理程序
- 9) 举报管理制度

天合光能定期评估与人权相关的风险和潜在影响。我们定期对全球人权原则进行回顾，并相应更新我们的政策、法规和制度，以推动人权状况的持续改进。

适用范围：

本政策作为公司管理的一部分，适用于天合光能股份有限公司及其所有全资控股及非全资控股子公司、分公司（以下统称为“公司”）。我们倡议公司的合作伙伴及其他相关方能遵守本政策所体现的原则，并鼓励其制定和实施类似政策。

我们的原则

天合光能的持续成功离不开人才，天合光能致力于为员工、供应商和其他利益相关方提供优良的工作场所。我们承诺以诚信和负责任的方式开展我们的运营活动，以满足环境、社会和治理（ESG）责任领域的公认要求。天合光能制定了以下全球人权原则，以践行我们尊重人权的承诺：

- 1) **防止人口贩卖、强迫劳动和童工：**天合光能承诺不会在我们的业务或供应链中使用或容忍使用强迫劳工、债务抵押劳工、契约劳工、非自愿监狱劳工、受奴役劳工或人口贩卖。我们时刻保持警惕，保护全球供应链中劳动者的权益。我们在雇佣过程中禁止采用粗鲁或不人道的方式（如：体罚、威胁、扣押证件、收取押金或保证金等方式招聘或接收人员从事工作等）。天合光能承诺不会雇佣童工，采取措施防范招用童工，并建立了救助童工的机制和措施。天合光能规定 18 岁以下的员工不得从事危险及与其个人身心成长不相符的工作。
- 2) **工作时间和最低工资标准：**天合光能尊重履行当地法律规定的最长工作时间要求，或最长工作时间。

每周不超过 60 小时，员工的连续工作时间不超过 6 天，即每周至少休息 1 天。天合光能承诺向员工支付的薪酬满足或超过当地的最低工资要求，包括加班时间和法定福利有关的法律要求。天合光能致力于提高员工的福利待遇以至少满足其基本生活所需。

- 3) **供应链责任：**如《供应链尽职调查体系手册》、《供应商社会责任承诺书》、《冲突矿产管理制度》所述，天合光能通过供应链尽责管理向供应商及其上游传达本人权政策相关要求，要求供应商建立和秉持公平就业、环境、健康和安全以及道德规范，以满足所有适用的法律法规要求，并传递此要求至其上游。我们高度关注冲突矿产，建立物料溯源机制，与供应商共同合作，通过负责任采购的方式拒绝采买通过侵犯人权、破坏环境以及暴力手段开采的矿产，促进可持续发展。
- 4) **环境管理：**天合光能谨慎使用我们产品中的原辅材料，努力节约能源、水和其他自然资源，并且努力减少废弃物及其排入空气、水以及土地造成的环境影响。天合光能《环境、职业健康安全和能源管理方针》体现了我们对环境的承诺，天合光能也承诺全球供应链中的环境保护管理。
- 5) **工作场所安全：**天合光能致力于为员工、承包商和社区提供安全、健康的工作场所。天合光能致力于提供一个安全的商业环境，保护我们的员工、产品、材料、设备和信息。我们努力遵守所有适用的法规要求，并以更高标准要求自己。
- 6) **产品责任：**天合光能主要业务覆盖光伏产品、光伏系统、智慧能源三大板块。随着我们提供的产品和服务范围的不断扩大和变化，我们评估产品用于侵犯人权的潜在可能性。这些挑战包括：因研发、制造、运输、使用和报废产品处置可能引起的环境健康和安全问题等。我们制定了产品监管政策，以确保产品安全和环境保护贯穿整个产品生命周期。
- 7) **多元化和非歧视：**天合光能重视员工、客户、供应商和其他利益相关方的多元、平等与包容。我们为所有求职者和员工提供平等的就业机会，坚持同工同酬。我们不会针对种族、国籍、民族、肤色、宗教信仰、性别、年龄、身体或精神残疾、婚姻状况、生育状况、政治派别、性取向或任何其他受当地法律、法规或条例保护的个体特征做出歧视性行为或发表歧视性言论。
- 8) **禁止骚扰和虐待：**天合光能员工必须尊重同事、客户和供应商。天合光能承诺构建一个没有骚扰，没有虐待的工作场所。我们不容忍骚扰行为或任何其他形式的暴力或虐待行为。
- 9) **结社自由和集体谈判自由：**结社自由是员工自由组建和加入员工组织（如：工会）的权利。集体谈判是由雇员团体就工资和其他就业条件与公司进行的沟通和协商。天合光能尊重员工依据当地法律选择自由集会结社、依法加入工会及集体协商的权利。我们承诺尊重我们的员工，并努力创造一个开放式的沟通环境，鼓励员工与管理者自由地谈论自己的想法、顾虑或问题。我们鼓励员工相互沟通，分享他们的想法、顾虑或建议。
- 10) **隐私权和言论自由：**隐私权和言论自由是相辅相成的权利。天合光能承诺保护隐私权，我们力求防止任何未经授权的访问、使用、删除、修改或披露公司数据信息和个人信息。言论自由是多元文化的基础，对创新、革新以及个性的培养具有重要作用。天合光能鼓励员工提出建议或意见，帮助公司提高管理效率。天合光能建立了申诉机制，提供多种渠道，包括电子邮件、热线、意见箱、线上平台等，让员工、供应商和其他外部利益相关方报告工作场所中的任何事宜。

投诉与举报

为收集和倾听各方诉求，天合光能建立了投诉与举报机制，员工、供应商、商业合作伙伴、客户及其他利益相关方可以通过电话、电子邮箱、实体信箱等渠道，匿名或实名向公司反馈或举报违反本人权原则的事件或有关人权的疑虑。我们将依据《举报管理制度》开展调查并及时跟进反馈，并对举报人信息进行保密，保护举报人免受报复。

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