

Trina Solar Co., Ltd

Conflict Minerals Report 2024

Published Date: May 30th, 2025

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Management Department

Survey period: January 2024 to December 2024

Reporting scope: Consistent with the scope of the
Company's 2024 Sustainability Report

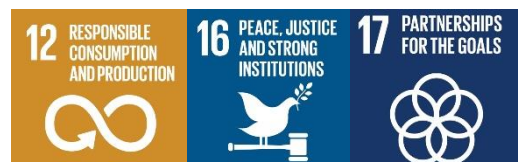


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I. Commitment to Responsible Mineral Sourcing

As an important participant in the global PV manufacturing industry chain, we (“Trinasolar” or “the Company”) are fully aware that the raw materials and components (such as solder tapes, conductive pastes, electronic components, etc.) used in the production of PV modules, energy storage systems and other products may contain metals including Tin, Tantalum, Tungsten, Gold (collectively referred to as 3TG) and Cobalt, as well as natural mica. We understand that the sourcing of these minerals entails potential “conflict minerals” risks related to human rights, environmental and regional conflict issues.

Trinasolar maintains a zero-tolerance approach to any transactions involving Conflict Minerals. We are strongly committed to responsible mineral sourcing, and we continue to conduct due diligence throughout our supply chain to ensure that all metals used in our products are obtained from socially and environmentally responsible sources.

We are committed to operating responsibly across all aspects of our business and expect our supply chain partners to uphold the same high standards in environmental protection, social responsibility and human rights safeguards by establishing a rigorous supplier oversight procedure. We are determined to eliminate any behavior that directly or indirectly contributes to armed conflict, human rights abuses or environmental damage, and to ensure that the value chain of the PV clean energy industry is aligned with the global vision of sustainable development.

II. Creating a Conflict-Free Minerals Supply Chain

As a core enterprise in the global photovoltaic manufacturing sector, the Company deeply acknowledges the vital role played by international regulatory bodies, industry organizations and value chain partners in promoting the sustainable development of the minerals supply chain. The principles of responsible sourcing are deeply embedded in the Company's ESG management system. The Company attaches great importance to the management of Conflict Minerals issues and related risks. In response to the increasingly stringent environmental and social responsibility expectations across the global clean energy industry, the Company has proactively established a responsible minerals sourcing system and has actively participated in industry collaborations in order to advance shared objectives related to responsible sourcing.

In managing conflict minerals risks, we strictly adhere to internationally recognized standards. We have integrated the following regulations and initiatives into the end-to-end governance of our photovoltaic products.

- Responsible Business Alliance (RBA): Responsible Minerals Initiative (RMI)
- U.S. Securities and Exchange Commission (SEC): Section 1502 of the Dodd-Frank Act
- European Union (EU): The Conflict Minerals Regulation (EU 2017/821)
- Organization for Economic Co-operation and Development (OECD): Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance)
- China Chamber of Commerce for Metals, Minerals & Chemicals Importers & Exporters (CCCMC): Guidelines for Social Responsibility in Outbound Mining Investments

We have set a target to achieve 100% commitment to refraining from sourcing or supporting the use of conflict minerals (conflict-free sourcing) and ensure full traceability of the country of origin for 100% of the 3TG contained in our products.

We are committed to strengthening traceability management of key materials used in our photovoltaic modules and energy storage systems—particularly those containing Tin (Sn), such as junction boxes and solder tapes—to ensure they are sourced responsibly and in accordance with environmental justice and human rights safeguards.

III. Responsible Minerals Management

i. Professional Management and Execution Team

Under the oversight the Board of Directors and the overall coordination of the ESG Management Committee, the Company collaborates across internal departments and supply chain partners to promote responsible minerals management, extending the principles and practices of conflict minerals management to direct suppliers and throughout the entire value chain.

Recognizing supply chain compliance and Conflict Minerals management as a material ESG issues, the Company has established a Conflict Minerals Management Task Force. This cross-functional team comprises representatives from the Supply Chain Management Department, Procurement Department, Legal Department, Risk Management Department, Technical Engineering Center and the Central Research Institute, with an executive team with relevant capabilities and experience to coordinate the implementation of the conflict minerals management methodology in alignment with our internal policies.

The Conflict Minerals Management Task Force is responsible for implementing the Responsible Minerals Management System and related procedures in coordination with relevant stakeholders. This includes conducting supply chain due diligence as well as identifying and mitigating associated risks. The Supply Chain Management Department is specifically responsible for implementing the

conflict minerals program and monitoring its progress.

ii. **Continuous Optimization of Management Policies and Processes**

The Company continuously enhances its responsible minerals management practices by aligning its procedures with the OECD Due Diligence Guidance. Since 2015, the Company has developed and implemented a comprehensive management system to support conflict minerals oversight and compliance. The Company issued the Trinasolar Conflict Minerals Management System, which clearly defines the roles and responsibilities of management and relevant departments, and set forth procurement requirements and due diligence procedures for suppliers that may provide materials containing potential conflict minerals.

The Company identifies and manages Conflict Minerals through the following processes:

1. **Identification of in-scope products and suppliers:** Review the product bills of materials to identify products that may contain 3TG, along with the associated suppliers.
2. **Reasonable Country of Origin Inquiry (RCOI):** Suppliers are required to complete the Conflict Minerals Reporting Template (CMRT). Based on their responses, business units assess the country of origin of the 3TG, and use a risk control matrix to categorize suppliers into high-, medium-, or low-risk.
3. **Due Diligence:** Each business unit of the Company conducts due diligence on suppliers identified as high or medium risk.
4. **RCOI and Due Diligence Documentation:** Each business unit of the Company uploads its annual RCOI results and due diligence reports into the Supplier Relationship Management (SRM) system.
5. **Continuous Process Improvement:** The Company actively monitors policy

development related to conflict minerals as well as updates published on official website of RMI, and ensures that the CMRT is updated to the latest version. We also regularly review and refine each step of the conflict minerals management process to ensure its effectiveness.

The Company regularly revises and improves relevant systems and processes to ensure that the mineral value chain is free of Conflict Minerals and maintains full traceability, with a revision cycle not exceeding 2 years.

iii. Electronic Platform for Full-Process Traceability

The Company has comprehensively upgraded its supply chain management system and conducts supply chain due diligence through the integrated traceability system and the SRM system. By consolidating due diligence results, material traceability information and related data, the Company has built a supply chain map within the SRM system, covering 100% of the bill of materials (BOM). Additionally, the traceability system enables the management of key materials and conflict element minerals, facilitating comprehensive optimization of supply chain management.

The Company has set management targets such as the traceability completion rate of key materials for core suppliers, planning to achieve 100% traceability coverage of major raw materials within three years. Progress toward these targets will be continuously monitored and evaluated in the coming years.

iv. Close Supplier Support and Cooperation

The Company actively fulfills its role as an "anchor company" within the supply chain, fostering strong and collaborative relationships with its suppliers. Through regular business communication, audits and evaluations, supervision and rectification, as well as knowledge exchanges and training, the Company communicates the principles, requirements, and best practices of responsible sourcing to suppliers. We also maintain ongoing dialogue to understand supplier expectations, and provide

continuous support and capacity building to promote responsible supply chain management. The Company actively supports the Responsible Minerals Initiative (RMI) program and adopts its tools and guidance documents to identify and eliminate risks associated with the procurement of conflict minerals.

To further strengthen supplier capabilities, the Company has engaged a professional organization to deliver ESG-focused training to its suppliers. The training covers key topics such as conflict minerals management, responsible sourcing, supplier due diligence, etc. 98% of core suppliers have participated in the training, with over 300 individuals providing feedback following the training.

The Company requires all relevant suppliers to procure materials from sources that are both environmentally and socially responsible.

v. Accessible Grievance Mechanism

The Company encourages open communication and welcomes concerns or feedback from stakeholders—including employees, suppliers, industry partners, and the public—through accessible and transparent channels. We specifically invite submissions related to potential irregularities, concerns, or suggestions for improvement regarding the sourcing of tin and other minerals in our supply chain via the dedicated email: supplychain.strategy@trinasolar.com.

Individuals may submit information anonymously, and the Company will take the highest level of confidentiality measures permitted by law to protect the rights and interests of whistleblowers. All reported issues will be addressed in a timely and substantive manner, and stakeholders will be informed of the progress and outcomes through appropriate channels.

vi. Supply Chain Risk Identification and Assessment

The Company identifies the mineral content of raw materials used in its products through internal expertise, including assessments conducted by specialized departments such as the Central Research Institute. Suppliers are mapped, screened, and identified based on their involvement with key raw materials. To evaluate and manage risks associated with conflict minerals, the Company conducts a RCOI to reasonably and appropriately trace and investigate the origin of country of minerals used in its products.

To mitigate upstream risks related to conflict minerals, the Company conducts rigorous evaluation and screening of suppliers during the supplier onboarding process.

In order to further ensure supply chain compliance, the Company requires potential suppliers to sign a “Letter of Commitment on Non-Use of Conflict Minerals” affirming their adherence to the Company's conflict minerals policy and commitment to responsible sourcing. This measure strengthens supplier management and enhances accountability across the supply chain.

The Company requires suppliers to complete a Supplier Risk Assessment Form. Based on the assessed ESG risk level (high, medium or low), the Company may initiate corrective actions or conduct on-site audits. Direct suppliers are responsible for managing any changes (including additions or removals) to Smelter or Refiner (SORs) information in their upstream supply chain, and should promptly notify the Company of changes that require revision of the Conflict Minerals Reporting Template (CMRT) or are otherwise subject to the requirements of the Conflict Minerals Data Exchange Standard.

In 2024, the Company conducted a comprehensive identification of all products in mass production that contain 3TG necessary for their functionality and production.

As part of this process, the Company identified and mapped direct suppliers involved in the 3TG mineral value chain. A dedicated list of suppliers was established for conflict minerals management, to be used in the event that any high- or medium-risk suppliers are identified. The Company maintains all records related to conflict minerals due diligence activities for a minimum of 10 years.

The Company does not purchase or source raw materials or refined minerals directly from smelters or refiners, however, the Company understands the importance of third-party conflict-free certification at the upstream smelter or refiner level, particularly for downstream enterprises. During the reporting period, following the identification of tin as a relevant mineral used in products, 18 direct suppliers were identified as providing tin-containing materials. All 18 suppliers submitted CMRTs at the Company's request, resulting in a 100% response and submission rate.

All 18 suppliers were able to provide smelter or refiner (SOR) information traceable to the country of origin for tin. A total of 4 SORs were identified, all of which were located in China and provided Responsible Minerals Assurance Process (RMAP) certification. The Company cross-checked these certifications against the RMI list of conformant SORs to validate their conflict-free status. All of the SORs were confirmed to be RMI-conformant SORs.

The Company conducts regular reviews of its supplier due diligence processes and raw material sourcing practices. Where deficiencies or improvement opportunities are identified, the Company engages directly with the relevant suppliers and requests them to make improvements accordingly.

vii. Risk Mitigation and Management Measures

If suppliers associated with high-risk SORs in the upstream supply chain are identified through the Company's assessment, the Company will issue a notice of non-

compliance, require them to carry out further investigation, and request the implementation of risk mitigation measures, such as establishing an alternative source of 3TG. Meanwhile, products and materials linked to high-risk SORs will be treated as non-conforming. Upon receiving risk mitigation plans from direct suppliers, the Company will re-assess the case to ensure that the proposed measures are effectively implemented.

In addition, the Company performs ongoing supplier ESG due diligence across four key dimensions: environmental risks, social risks, business ethics and material traceability. Conflict minerals management is a critical component of the material traceability dimension.

As of the end of the reporting period, the Company has identified 0 high-risk suppliers and has not terminated cooperation with any suppliers due to conflict minerals-related concerns. The Company has used 0 quantity of conflict minerals and has generated 0 revenue from products containing conflict minerals.

viii. Due Diligence Audit and Reporting

The Company highly recognizes the importance of supply chain due diligence, therefore we conduct due diligence on our core suppliers and high-risk suppliers of conflict minerals every year, and conduct traceability audits on their raw materials.

The Company actively promotes the implementation of a robust supply chain due diligence system. Supply chain and supplier management objectives are dynamically adjusted based on business requirements and evolving international regulations. Suppliers of primary and auxiliary materials are categorized by business division, with core and key material suppliers identified to conduct due diligence based on key ESG risk factors.

To support this effort, the Company has established an internal supplier due diligence audit team composed of 25 employees selected from key functional departments. These employees undergo structured due diligence training, assessment and certification processes. In addition, a dedicated incentive program has been implemented to encourage continued engagement and performance. These initiatives help ensure the professional capability of the internal team in conducting supplier due diligence.

We have established a comprehensive information disclosure mechanism to summarize and disclose the progress and results of the Conflict Minerals due diligence project through the annual sustainability report. Through transparent disclosure, the Company aims to strengthen engagement with stakeholders and continuously improve its conflict minerals management capabilities.

The Company does not maintain direct relationships with upstream SORs. All direct suppliers are required to provide a list of upstream SORs obtained through the supply chain due diligence. These lists are compared against the RMI conformant SOR list and lists published by other external organizations to assess whether they have been verified as conflict-free.

IV. Future Efforts and Continuous Improvement

The Company will continue to collaborate with direct suppliers to support high-risk SORs in obtaining RMAP certification, thereby strengthening their Conflict Minerals management capabilities and further mitigating risks along the minerals value chain. To enhance supplier awareness and compliance, the Company will provide additional training and communication on Conflict Minerals-related requirements.

Looking ahead, the Company intends to improve the accuracy of due diligence data, enhance the completeness of supplier information management, and strengthen the

timeliness of data collection. Further enhancements will be made to verify the information provided by supplier in due diligence and to integrate this process into the overall supplier evaluation framework.

The Company remains committed to maintaining a 100% response rate to the Conflict Minerals Reporting Template (CMRT) and will continue promoting 100% signing of the Conflict Minerals Free Commitment among its suppliers.

Conflict Minerals' due diligence will continue to be conducted to a high standard to eliminate both human rights and environmental abuses in the minerals supply chain and to fulfill its commitment to responsible minerals sourcing.