



Renewable Energy & Human Rights Benchmark 2025 Company Profile

Company name JA Solar

Sub-sectorSolar PV ManufacturerOverall score11% weighted average

Section	on score	Weighting	For section
	27%	20%	1. UNGP core indicators
	7%	40%	2. Salient human rights risks
	0%	10%	3.a Response to risk of exposure to forced labour
	N/A	10%	3.b Serious allegations
	N/A	20%	4. Low-Carbon Transition Assessment

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found <u>here</u>.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

Detailed assessment

1. UNGP core indicators based on the CHRB methodology (20% of total)

A. Policy commitments and governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: • Met: General HRs commitment: The Human rights policy states that 'JA Solar is committed to respecting the rights under: The International Bill of Human Rights' [Human Rights Policy, N/A: jasolar.com] • Met: Commitment to UNGPs: The Human rights policy states that 'JA Solar is committed to respecting the rights under: [] United Nations Guiding Principles on Business and Human Rights' [Human Rights Policy, N/A: jasolar.com]
A.2	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	The individual elements of the assessment are met or not as follows: Not Met: Commitment to ILO core principles: The Human rights policy states that 'JA Solar is committed to respecting the rights under: [] ILO Declaration on Fundamental Principles and Rights at Work'. The policy contains commitments regarding all ILO Core principles, although in relation to freedom of association and collective bargaining, it states the following: JA Solar upholds the freedom of association and respect for the right of all workers to freely and voluntarily establish and join groups for the promotion and defence of their occupational interests in accordance with national law'. In these cases, where companies put these rights in the context of local laws, the Company is expected to commit to allow alternative means to not hinder rights. [2022 Sustainability and ESG Report, 2023: jasolar.com] Met: Expects business relationships to commit to ILO core principles: The Responsible sourcing policy commits to each ILO core area including non-discrimination, forced labour and child labour. In relation to freedom of association and collective bargaining, it states the following: 'Our suppliers must respect the rights of workers to form or join trade unions (or other legal organizations of their

Indicator Code	Indicator name	Score (out of 2)	Explanation
			own selection) and the right to collective bargaining. Workers must not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such trade unions or other legal organizations'. [2022 Sustainability and ESG Report, 2023: jasolar.com]
A.3	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Not Met: Commitment to remedy adverse HRs impacts Not Met: Expects business relationships to make this commitment Not Met: Commitment to collaborate with judicial or non-judicial mechanisms Not Met: Commitment to work with business relationships on remedy
A.4	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: • Met: Board level responsibility for HRs: The ESG policy states that 'The Board of Directors has instituted the 'Strategy and Sustainable Development Committee', tasked with overseeing and guiding the Company's initiatives in sustainable development. The Board has adopted the Working Rules of the Strategy and Sustainable Development Committee of Board of Director, which are designed to guide and approve the Company's climate and ESG strategies and objectives, as well as regularly monitor and evaluate the progress of these strategies and objectives'. the ESG policy includes human rights. [Environmental, Social, and Governance (ESG) Sustainability Policy, N/A: jasolar.com] • Not Met: Describes HRs expertise of Board member • Not Met: Board member/CEO signal importance of HRs in their communications • Not Met: CEO or board incentives
A.5	Responsible lobbying and political engagement fundamentals	0	The individual elements of the assessment are met or not as follows: • Not Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach. • Not Met: Monetary value of direct political contributions • Not Met: Monetary value of indirect political contributions • Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)

B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1	Responsibility and resources for day-to-day human rights functions	1	The individual elements of the assessment are met or not as follows: • Met: Senior responsibility for HRs implementation and decision making: The ESG policy states that 'The management has set up the 'ESG and Sustainability Management Committee', which is responsible for formulating the company's Sustainability strategy and goals. The management implements strategic directives from the decision-making level and has developed the Regulations of procedure for ESG and Sustainability Management Committee. These rules are intended to drive the implementation of ESG-related initiatives and facilitate periodic reviews of the progress toward ESG objectives'. ESG policy includes human rights [Environmental, Social, and Governance (ESG) Sustainability Policy, N/A: iasolar.com] • Met: Describes day-to-day responsibility for implementing HRs commitments: Below management level, the ESG policy states that 'At implementation level, the formally established 'ESG Management and Sustainability Department' has responsibility to lead and convene the corresponding departments based on key issues. This department is responsible for executing decisions on ESG, climate, and sustainability front. It participates in ESG practices, promotes the implementation of related initiatives, and collaborates with relevant personnel across departments and sites to ensure unified and coordinated operations'. ESG policy includes human rights. [Environmental, Social, and Governance (ESG) Sustainability Policy, N/A: jasolar.com] • Not Met: Day-to-day resources and expertise allocation in own operations
B.2	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: • Not Met: Describes process of identifying risks in own operations: The Human rights policy states that 'JA Solar continuously monitors and evaluates the evolving human rights situation in relevant areas. Human rights impacts must be integrated into all relevant risk assessment procedures. JA Solar will regularly and at least once every twelve months identify and assess the potential risks of adverse human rights impacts. The human rights impact assessment has to be revised when changes occur in relation to JA Solar's business operations [] JA Solar must put in place detailed human rights due diligence procedures as well as responses and controls in relevant policies and management systems which shall be periodically updated to reflect changes in JA Solar's business operations and the human rights risk assessment. These policies must at a minimum contain a description of JA Solar's approach to due diligence,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			the processes put in place, controls, mitigation actions and measures that shall be taken to verify compliance with JA Solar's human rights commitments and this Human Rights Policy. However, no description was found of the actual process that it follows to identify which are the potential human rights risks and impacts that it faces in its own operations. [Human Rights Policy, N/A: jasolar.com] • Not Met: Describes process for identifying risks in business relationships: The Responsible sourcing policy states that 'JA Solar has established a comprehensive framework to identify and address key risks associated or stemming from our suppliers from pre-screening, selection, onboarding, due diligence and ESG monitoring to disengagement in case of severe non-compliance. We also allocate sufficient resources and define clear roles and responsibilities within JA Solar to ensure the proper functioning of this Policy and the achievement of the/its underlying objectives'. According to the policy, the process includes a screening process for selecting new suppliers'. However, evidence seems to focus in considering predefined ESG requirements. This subindicator looks for evidence of the process by which the Company identifies, in a consolidated way, what are the potential human rights risks and impacts that it faces through its supply chain. [Responsible Sourcing Policy, N/A: jasolar.com] • Not Met: Describes risk identification system incl. stakeholder consultation • Not Met: Describes how risk identification system is triggered by new circumstances: The Human rights policy states that 'The human rights impact assessment has to be revised when changes occur in relation to JA Solar's business operations'. However, as indicated above, this evidence reflects the Company's commitment, not a description of the actual steps taken by the Company to do so.
B.3	Assessing human rights risks and impacts	0	[Human Rights Policy, N/A: jasolar.com] The individual elements of the assessment are met or not as follows: Not Met: Describes assessment process and discloses salient HRs risks: The Human rights policy states that 'JA Solar continuously monitors and evaluates the evolving human rights situation in relevant areas. Human rights impacts must be integrated into all relevant risk assessment procedures. JA Solar will regularly and at least once every twelve months identify and assess the potential risks of adverse human rights impacts. The human rights impact assessment has to be revised when changes occur in relation to JA Solar's business operations [] JA Solar must put in place detailed human rights due diligence procedures as well as responses and controls in relevant policies and management systems which shall be periodically updated to reflect changes in JA Solar's business operations and the human rights risk assessment. These policies must at a minimum contain a description of JA Solar's approach to due diligence, the processes put in place, controls, mitigation actions and measures that shall be taken to verify compliance with JA Solar's human rights commitments and this Human Rights Policy. However, no description was found of the actual process that it follows to determine which are its salient human rights issues, including factors (i.e. geographical, social, economic, etc.) taken into account. [Human Rights Policy, N/A: jasolar.com] Not Met: Describes how process applies to supply chain: The Responsible sourcing policy states that 'JA Solar has established a comprehensive framework to identify and address key risks associated or stemming from our suppliers from prescreening, selection, onboarding, due diligence and ESG monitoring to disengagement in case of severe non-compliance'. Two of the elements of the framework are 'A screening process for selecting new suppliers, taking into account ESG requirements'; 'contractual assurances from our suppliers to comply with our ESG standards and JA Solar'
B.4	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: • Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Human rights policy states: 'JA Solar will take actions to prevent, adequately mitigate, cease or minimize actual or potential adverse human rights impacts that JA Solar identifies. If JA Solar identifies actual human rights impacts in its own operations, it shall take appropriate measures to immediately bring those adverse impacts to an end'. However, no evidence was found describing the system it has in place to take action against salient human rights issues. [Human Rights Policy, N/A: jasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Describes how global system applies to supply chain: The ESG report states that 'To prevent potential social and environmental risks in the supply chain and ensure compliance with supply chain responsibility regulations [], JA Solar implements ESG and traceability audits on suppliers. The audits combine assessment questionnaires and on-site audits, after which a sustainability audit report will be generated. We also subsequently develop a corrective action plan for suppliers who have failed the audits in order to help them improve their sustainability performance. In order to ensure suppliers' compliance with the Code of Conduct for Suppliers, JA Solar conducts "corrective actions". We engage with third-party auditors to conduct audits on the work and accommodation facilities of suppliers through confidential communication with supplier-end workers. During the audits, suppliers are required to be honest and to allow auditors to access their facilities, records and workers. For those with issues, JA Solar requires them to provide a detailed remediation plan immediately, and to take corrective measures to rectify any deviation from the Code of Conduct for Suppliers. We track and confirm the suppliers' implementation of corrective actions. If a supplier is found to have violated the Code of Conduct for Suppliers, JA Solar will terminate its cooperation with them'. It indicates that it conducted environmental and social evaluation of 220 suppliers. However, this evidence refers to a compliance programme. Although a compliance programme can be part of the due diligence programme. Although a compliance programme can be part of the due diligence programme. Although a compliance programme can be part of the due diligence programme. Although a compliance programme can be part of the due diligence programme. Although a consolidated approach. [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] Not Met: Example of actions decided on at least 1 salient HRs issue: The Company indicates that 'In ord
B.5	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Not Met: Describes system for evaluation effectiveness of actions: The ESG report sates that 'We track and confirm the suppliers' implementation of corrective actions. If a supplier is found to have violated the Code of Conduct for Suppliers, JA Solar will terminate its cooperation with them'. However, it seems that the focus is on individual suppliers' compliance. This subindicator looks for evidence that the Company tracks whether action plans are effective to address the salient issues in a consolidated way. [2022 Sustainability and ESG Report, 2023: jasolar.com] Not Met: Example of lessons learned from evaluation effectiveness of actions
B.6	Communicatin g on human rights impacts	0	The individual elements of the assessment are met or not as follows: Not Met: Provides one example of comms with stakeholders Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s)fo r workers	1.5	The individual elements of the assessment are met or not as follows: • Met: Grievance mechanism accessible to all workers: If an employee suspects any violation of the law, breach of the Code of Conduct or any other violations, he or she may report it to his or her department head or to the Audit & Supervision Committee through the following channels. External stakeholders can also report any violation in the cooperation through the following channels []'. These include Audit & Supervision Committee, JA Solar SpeakUp Line, Whistle-blowing hotline, email, QQ, wechat and postal address. [JA Solar Code of Conduct, 2024: igsolar.com] • Not Met: Grievance mechanism available in appropriate languages and workers made aware

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Met: Describes how workers in supply chain access grievance mechanism: The Responsible sourcing policy states that 'To ensure strong compliance with its obligations outlined above, and specifically to be able to rely on an as wide as possible pool of information about its suppliers, JA Solar has put in place a developed grievance procedure. Through this complaints procedure, affected persons, civil organizations, and any other interested parties can submit complaints to JA Solar, including in relation to its direct and indirect suppliers'. The Company provides an internet address, postal address and telephone number. In future assessments the Company will be expected to demonstrate this applies to all business relationships. [Responsible Sourcing Policy, N/A: jasolar.com] Met: Expects business relationships to convey expectation to their business relationships: As indicated above, the system covers indirect suppliers [Responsible Sourcing Policy, N/A: jasolar.com]
C.2	Grievance mechanism(s) for external individuals and communities	1.5	The individual elements of the assessment are met or not as follows: • Met: Grievance mechanism accessible to all external individuals and communities: The Company's ESG report states that 'To establish smooth reporting and complaint channels, JA Solar has formulated the Management System for Informer Protection and Integrity Reporting, so as to provide internal and external stakeholders with multiple reporting channels such as Official WeChat accounts, complaint hotlines, and email addresses. Once we receive information from reports, we will hand the case over to the Internal Audit Department immediately for preliminary screening and in-depth investigation. As for suspected criminal acts, we will hand them over to the Legal Department for processing. We set up the "SpeakUp" reporting mechanism for overseas markets, thus providing a safe, convenient, and transparent reporting channel for all our personnel, partners and other stakeholders'. [2023 JA Solar Sustainability and ESG Report, 2024: iasolar.com] • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Met: Describes how external individuals/communities access grievance mechanism: The Responsible sourcing policy states that 'To ensure strong compliance with its obligations outlined above, and specifically to be able to rely on an as wide as possible pool of information about its suppliers, JA Solar has put in place a developed grievance procedure. Through this complaints procedure, affected persons, civil organizations, and any other interested parties can submit complaints to JA Solar, including in relation to its direct and indirect suppliers'. The Company provides an internet address, postal address and telephone number. In future assessments the Company will be expected to demonstrate this appliers to all business relationships. [Responsible Sourcing Policy, N/A: jasolar.com] • Met: Expects business relationships to convey expectation to their business relationships: As indicated above, the system c
C.3	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: • Not Met: Describes approach taken to remedy adverse HRs impacts: The Company describes, in its responsible sourcing policy, the course of action in case of both minor and major compliance concerns. However, these processes do not describe how specifically remedy for victims would be provided, and what types of remedies exist for them (in an hypothetical case). Alternatively no evidence found of specific examples of remedies provided. [Responsible Sourcing Policy, N/A: jasolar.com] • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy

2. Salient human rights risks (40% of total) D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.M	Commitment to respect indigenous peoples' rights	0	The individual elements of the assessment are met or not as follows: • Not Met: Expectation of project developer clients to have a public commitment to respect indigenous rights: The Human Rights policy states that 'JA Solar respects local, indigenous and tribal people's rights, including their rights to maintain and strengthen their own institutions, cultures, traditions and to pursue their development in keeping with their own needs and aspirations as well as to participate in decision-making processes that affect their lives'. However, no evidence found of similar expectation for business partners in its value chain, including, at a minimum, project developer clients. No reference to UNDRIP was found. [Human Rights Policy, N/A: jasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Commitment to only work with business partners that respect FPIC
D.2.M	Engagement		The individual elements of the assessment are met or not as follows:
	with all		• Not Met: Describes how local communities identified and engaged in the last two
	affected communities		years: The Company reports in relation collaboration in community development.
			For manufacturers, this criteria is looking for a process to engage with communities
	communities		on potential impacts related to the operational phase of the project the
			manufacturer is involved in (i.e.: impacts of the construction,
			operation/maintenance on communities for example). [2023 JA Solar Sustainability
		0	and ESG Report, 2024: jasolar.com]
			• Not Met: Provides two examples of engagement with communities: Although the
			Company reports examples of community development, this subindicator looks for
			examples of engagement with affected communities whose human rights have
			been or may be affected by its activities in the last two years. [2023 JA Solar
			Sustainability and ESG Report, 2024: jasolar.com
			Not Met: Examples of engagement refer to marginalised groups and provide
			additional detail
			Not Met: The company meets B2.C, B3.D, B4.D and B.5.C
D.3.M	Benefit and		The individual elements of the assessment are met or not as follows:
	ownership		Not Met: Rewards for clients that have a commitment to identify potential
	sharing policy	0	benefit and ownership sharing
	,		Not Met: Rewards for clients for disclosing statistics for each project
			(demographics of ownership sharing)
D.4.M	Local wind &		The individual elements of the assessment are met or not as follows:
	solar energy		Not Met: Actions taken to support access and affordability of renewable energy
	access,		in the value chain: JA Solar's 2022 Sustainability Report and ESG Report states that
	affordability		"Exerting its own industrial and technological advantages, JA Solar actively assists
	a,		overseas regions in the construction of PV projects in a bid to build a community
			with a shared future for humankind. In 2022, JA Solar ardently promoted the
			"Southern Entrepreneurship" 1.6MW project, providing PV module assistance to
			countries such as Somalia, Central Africa, Lebanon, Sudan, and supporting the
			development of PV industry in technologically backward countries and regions." In
		0	addition, " JA Solar is concerned about every corner of the world. In 2022, it made
			donations to United Nations High Commissioner for Refugees (UNHCR), providing
			PV lamps for forcibly displaced families, and delivering support to refugees in dire
			straits in various parts of the world." Criterion is not met because it remains
			unclear whether the Company is taking actions in its value chain or in relation to
			communities affected by the projects it supplies. No further evidence found in
			relation to missing requirement. [2022 Sustainability and ESG Report, 2023:
			jasolar.com]
			Not Met: Public support for government policies addressing energy access
			Not Met: Including a timebound action plan and reporting targets on supporting
			energy access and affordability in consultation with communities

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.M	Respect for land and natural resource tenure rights	0	The individual elements of the assessment are met or not as follows: • Not Met: Expectation for clients to have commitment to respect land ownership/natural resources as in VGGT • Not Met: Steps taken to use leverage to resolve land rights issues
E.2.M	Just and fair physical and economic displacement policy implementatio n including free, prior and informed consent	0	The individual elements of the assessment are met or not as follows: • Not Met: Expectations for clients to commit to IFC PS 5 for physical and economic displacements • Not Met: Steps taken to use leverage

F. Security and conflict-affected areas

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.M	Operating in or	0	The individual elements of the assessment are met or not as follows:
	sourcing from		

Indicator Code	Indicator name	Score (out of 2)	Explanation
	conflict- affected areas		Not Met: Commitment to heightened HRDD in conflict affected areas: No evidence was found beyond the context of conflict minerals [2022 Sustainability and ESG Report, 2023: jasolar.com] Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens Not Met: How stakeholders are involved in the process to mitigate risks
F.2.M	Evidence of security provider human rights assessments	0	The individual elements of the assessment are met or not as follows: Not Met: Description of implementation of security approach and example Not Met: Description of monitoring of business partners Not Met: Local communities engaged in assessment of security Not Met: Example of working with community on this issue

G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.M	Responsible		The individual elements of the assessment are met or not as follows:
	sourcing of		• Met: Policy statement on OECD Guidance aligned due diligence: The Responsible
	minerals:		sourcing of minerals statement indicates the following 'JA Solar is committed to
	arrangements		reduce the use of 3TGs and cobalt in its products and dedicated to only sourcing
	with suppliers		minerals in a way that respects human rights, protects human and environmental
	With Suppliers		health, and combats forced labour, child labour, and human trafficking. JA Solar
			follows compliance safeguard in alignment with the OECD Due Diligence Guidance
			for Responsible Supply Chains of Minerals from CAHRAs and the Responsible
			Minerals Initiative (RMI)'. [Responsible Sourcing of Minerals Statement, N/A:
		1	[asolar.com]
			Not Met: The policy explicitly covers all minerals: The policy refers to 3TG and shall this part of the policy explicitly covers all the policy refers to 3TG.
			cobalt. It is not clear whether these are all the minerals that the Company uses in
			its processes [Responsible Sourcing of Minerals Statement, N/A: <u>jasolar.com</u>]
			Met: Policy expectations of business relationships: The statement also adds that 'JA Solar expects its suppliers, contractors, and other relevant stakeholders to
			adopt policies and due diligence management systems consistent with the OECD
			Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAS,
			the Responsible Minerals Initiative (RMI) and the Responsible Minerals Assurance
			Process (RMAP)'. [Responsible Sourcing of Minerals Statement, N/A: <u>jasolar.com</u>]
			Not Met: Contractual requirement for smelters/refiners to follow OECD
G.2.M	Responsible		The individual elements of the assessment are met or not as follows:
0.2.141	sourcing of		Not Met: Identification and mapping of suppliers: The ESG report states that 'To
	minerals:		effectively enhance the management capability of critical minerals, JA Solar defines
			the provisions for "conflict minerals" audit in supplier onboarding and daily audit.
	mapping and		The provisions explicitly require suppliers to complete the conflict mineral
	disclosing the		questionnaires and to verify the source of purchased materials and products. For
	supply chain		suppliers who refuse to track and monitor the origin of conflict minerals or are
			unable to determine the nature of the conflict minerals, JA Solar will suspend its
			cooperative relationship with them. In 2023, JA Solar's coverage of supplier audit
			based on the provisions for "conflict minerals" audit was 100%, and all the first-,
			second-, and third-tier suppliers were covered'. However, the information found
			seems to only apply to conflict minerals. [2023 JA Solar Sustainability and ESG
			Report, 2024: jasolar.com
			Not Met: Traceability system for mineral supply chain: See above. The Company
			also reports that the traceability ratio of suppliers involved in conflict minerals is
			100%. However, the Company also reports that In 2023, JA Solar carried out mineral tracing on junction boxes and solder strips involving the use of conflict
		0	minerals (Tin) and disseminated conflict minerals questionnaires that were
			developed based on Conflict Minerals Reporting Template (CMRT) principles issued
			by Responsible Minerals Initiative (RMI) to all suppliers of metal raw materials of
			PV solder strips and solder wires, with a traceability ratio of 100%'. It's not clear
			whether the process includes all relevant products/activities as refers specifically to
			junction boxes and solder strips. [2023 JA Solar Sustainability and ESG Report,
			2024: jasolar.com]
			• Not Met: Discloses smelters/refiners that are most significant part of supply chain
			Not Met: Suppliers in higher risk activities, geographies, products: The ESG also
			indicates that 'In 2023, JA Solar carried out mineral tracing on junction boxes and
			solder strips involving the use of conflict minerals (Tin) and disseminated conflict
			minerals questionnaires that were developed based on Conflict Minerals Reporting
			Template (CMRT) principles issued by Responsible Minerals Initiative (RMI) to all
			suppliers of metal raw materials of PV solder strips and solder wires, with a
			traceability ratio of 100%. The survey results showed that there is only one type of
			conflict mineral (Tin) sourced from JA Solar's suppliers, and no other conflict
			mineral materials involved. he metal "Tin" used by our suppliers was sourced from
			RMI-certified compliant Tin smelters list. JA Solar was not found to be using conflict

Indicator Code	Indicator name	Score (out of 2)	Explanation
			minerals throughout its supply chain in 2023'. However, it is not clear what suppliers are involved in higher risk situation due to activities or geographies. [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com]
G.3.M	Responsible sourcing of minerals: risk identification in mineral supply chains	0.5	The individual elements of the assessment are met or not as follows: • Met: Identification and prioritising of risks in supply chain: The Responsible sourcing of minerals statement indicates that that 'our due diligence approach mainly includes: 'Risk identification and assessment: Regularly identifying and evaluating our supply chain to identify potential risks associated with conflict minerals; Supplier engagement: Collaborating with suppliers to ensure transparency and compliance with JA Solar's sourcing standards; Smelter verification: Sourcing directly or indirectly from certified smelters to ensure minerals are conflict-free'. Regarding risks it indicates that 'JA Solar is committed to reduce the use of 3TGs and cobalt in its products and dedicated to only sourcing minerals in a way that respects human rights, protects human and environmental health, and combats forced labour, child labour, and human trafficking'. The ESG report states that 'The provisions explicitly require suppliers to complete the conflict mineral questionnaires and to verify the source of purchased materials and products. For suppliers who refuse to track and monitor the origin of conflict minerals or are unable to determine the nature of the conflict minerals, JA Solar will suspend its cooperative relationship with them. In 2023, JA Solar's coverage of supplier audit based on the provisions for "conflict minerals" audit was 100%, and all the first-, second-, and third-tier suppliers were covered'. [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [Responsible Sourcing of Minerals Statement, N/A: jasolar.com] • Not Met: Description of process to identify smelters/refiners and whether they carry out DD: In 2023, JA Solar carried out mineral tracing on junction boxes and solder strips involving the use of conflict minerals (Tin) and disseminated conflict minerals questionnaires that were developed based on Conflict Minerals Reporting Template (CMRT) principles issued by Responsible Minerals Initiative (RMI) to all sup

H. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.M	Commitment to		The individual elements of the assessment are met or not as follows:
	respect the		Not Met: Zero tolerance of threats/attacks on HRDs
	rights of human		Not Met: Expectation on business partners in value chain to make this
	-	0	commitment
	rights and	0	• Not Met: Description of how working with HRDs as part of risk assessment and
	environmental		DD
	defenders		Not Met: Description of how working with HRDs to create safe and enabling
			environment

I. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.M	Health and		The individual elements of the assessment are met or not as follows:
	safety		• Met: Discloses quantitative information on H&S in own operations (injury rate or
	,	1	lost days and fatalities) in last reporting period: The Company reports 1 employee
		1	death due to work-related injuries in both 2022 and 2023. Rate of work loss
			accidents per million hours worked in 2023 was 0.29. [2023 JA Solar Sustainability
			and ESG Report, 2024: jasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
		,	Not Met: Expects disclosure of H&S information of relevant business
			relationships: The supplier code contains different requirements related to health
			and safety, including 'occupational safety', 'physically demanding work',
			'emergency preparedness and response', 'machine safeguarding', 'sanitation and
			housing'. Regarding risk management system: 'Suppliers must establish a process
			to identify the environmental, health, safety, and ethical risks associated with their
			operational and labor practices. In addition, management must develop
			appropriate processes to control identified risks and ensure regulatory compliance'.
			However, no expectations were found in relation to disclosure of data to the
			Company.
			[Supplier Code of Conduct, N/A: jasolar.com]
			Not Met: Targets for H&S performance (including injury rates or lost days and
			fatalities)
			Met: The Company describes the process(es) it has in place to identify its health
			and safety risks and impacts: The ESG report states that 'the EHS team of JA Solar
			headquarters and each base organizes occupational health and safety risk
			identification and assessment at least once a year. We comprehensively identify
			and detect occupational hazards in production processes, labor processes, and
			production environment. At the same time, we conduct risk assessment and
			grading in accordance with the Fire Management Procedures, the Emergency
			Response Management Procedures as well as other system documents and
			operating procedures. Based on the evaluation results, we list the identified "major
			risks" and "significant risks" as unacceptable risks and include them in the
			Company's Unacceptable Risk List and Control Plan for strict control and follow-up
			review. Those classified as "general risk" and "low risk" are included in the
			acceptable risk list, and subject to control measures to further
			reduce the risk value, whereas negligible risks are excluded'. [2023 JA Solar
			Sustainability and ESG Report, 2024: jasolar.com]
1.2.M	Forced labour		The individual elements of the assessment are met or not as follows:
	risk		• Not Met: Board level oversight over policies on forced labour in supply chain.
	management		How relevant stakeholders informed board discussions
	management		Not Met: Capacity building with suppliers
			Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own
			ops and supply chain: The Company reports that 'In November 2023, we invited
			third-party experts to conduct compliance training for employees of relevant
			departments in order to enhance employees' understanding of anti-forced labor
			and compliance awareness. The experts interpreted the relevant laws and
			regulations on anti-forced labor to employees, gave a vivid explanation based on
			actual cases, and interacted with employees, thus laying a solid foundation for the
			compliance development of our business'. No evidence was found, however, of
			measures taken in relation to the supply chain. [2023 JA Solar Sustainability and
			ESG Report, 2024: jasolar.com
		0	Not Met: Factors to be considered when ending a business relationship incl.
			responsible disengagement: The supplier code states that 'Suppliers' compliance
			with this Supplier Code is subject to JA Solar's review, including third-party auditing
			of work and residential facilities and conducting confidential worker interviews.
			Suppliers must be transparent and provide prompt access to their facilities,
			records, and workers during any audit. We require suppliers to promptly provide a
			detailed remediation plan and take corrective actions for deviations from this
			Supplier Code, and JA Solar will track suppliers' remediation efforts. JA Solar may
			(without liability) terminate its relationships with any supplier found to be in
			violation of this Supplier Code, including for denying prompt access to our
			auditors'. However, it is not clear what are the factors it would consider when
			deciding whether to end the business relationship if it is not able to adequately use
			leverage to prevent or mitigate adverse impacts, in the context of forced labour
			risk management (i.e. relevancy of the supplier, responsible exit).
			[Supplier Code of Conduct, N/A: <u>jasolar.com</u>]

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.3.M	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		• Not Met: Employer Pays Principle in policy for own ops and supply chain: The
	Wage practices		supplier code of conduct states that 'Workers shall not be required to pay
			recruitment, hiring, or other similar fees related to their employment; our suppliers
			must bear or reimburse to their workers the cost of any such fees. All fees and
			expenses charged to workers must be disclosed to JA Solar and communicated to
			workers in their native language in advance of employment. JA Solar also expects
			our suppliers to hold their third-party labor agents or brokers to the standards and
			practices covered by this Supplier Code'. The Company's code of conduct states
			that 'We prohibit any fee incurred by the hiring which is charged to the employees'. No evidence was found, however, of a commitment to reimburse in case of fees
			being charged in own operations. [Supplier Code of Conduct, N/A: jasolar.com] &
			[JA Solar Code of Conduct, 2024: jasolar.com]
			Not Met: Describes work with suppliers on paying workers regularly, in full and
		0	on time
			• Not Met: Description of implementation and monitoring of this practice: The ESG
			report indicates that 'To actively create a harmonious and diverse workplace while
			ensuring employees' rights and interests, JA Solar has formulated and put in place a
			range of internal rules and regulations covering all regular employees, such as the
			Recruitment Management System, the Performance Appraisal Management
			System, the Employee Rewards and Punishments Management Measures, and the
			Code of Conduct for JA Solar's Employees. These regulations provide detailed
			standards on employee recruitment and promotion, remuneration and welfare,
			equal employment and other issues'. However, no details were found on whether
			these processes include monitoring this practice, particularly with employment
			agencies or labour brokers in its own operations. [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com]
			Not Met: Requirements on paying in full and on time in supplier codes and
			contracts
I.4.M	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Met: Requirements on free movement in supplier codes and contracts and own
	Restrictions on		operations: The supplier code requires the following 'Working must be voluntary,
	workers		and workers must be free to leave work and terminate their employment or other
			work status with reasonable notice. Our suppliers must not require workers to
			surrender government issued identification, passports, or work permits as a
		0.6667	condition of working, and our suppliers may only temporarily hold onto such
		0.6667	documents to the extent reasonably necessary to complete legitimate
			administrative and immigration processing'. The code of conduct states that 'We prohibit any forms of detaining or depriving of the employees' ID cards, passports
			or job license. The employees shall work at their sole will and be entitled to the
			leisure time'. [Supplier Code of Conduct, N/A: jasolar.com] &
			[JA Solar Code of Conduct, 2024: jasolar.com]
			Not Met: Describes working with suppliers on free movement of workers
			Not Met: Description of implementation and monitoring of this practice
1.5.M	Freedom of		The individual elements of the assessment are met or not as follows:
	association and		Not Met: Commitment on FoA/CB and requirements in suppliers codes and
	collective		contracts: See indicator A.1.2, it is not clear whether the Company is committed to
	bargaining		allow alternative mechanisms in places where these rights are restricted under
		0	local law. In addition, this subindicator looks for evidence of measures in place to
			prevent intimidation or retaliation against workers seeking to exercise these rights.
			[2021 Sustainability Report, 2022: jasolar.com] • Not Met: Describes work with suppliers on FoA/CB
			Not Met: Describes work with suppliers on FOA/CB Not Met: Assessment of scope of restriction of FOA/CB in supply chain
			Not Met: Assessment of scope of restriction of 1 0A/CB in supply chair Not Met: Global Framework Agreement
I.6.M	Living wage (in		The individual elements of the assessment are met or not as follows:
	supply chains)		Not Met: Requirements on living wage in supplier codes and contracts
	Jappi, chamb,		Not Met: Describes work with suppliers on living wage: In relation to living wages,
		0	one of the actions promoted by the Company consist in 'Establish a joint action
		0	plan(s) with contractors, supply chain partners and other key stakeholders to work
			towards achieving living wages and/or living incomes with measurable and time-
			bound milestones'. However, it is not clear whether it is already working on this or
			it is still just a plan. [Fulfilling Our Commitments (website), N/A: <u>jasolar.com</u>]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Description of process to determine living wages with unions: The
			Company states on its website that 'On 15 March 2024, JA Solar officially
			committed to joining the "Forward Faster" initiative launched by the United
			Nations Global Compact (UNGC), accelerating progress toward achieving
			sustainable development goals in the areas of gender equality, climate action,
			living wage, and finance & investment'. In addition, it established the following
			target: '100% of employees across the organization earn a living wage by 2030 []
			JA Solar will promote living wage guarantees through industry collaboration and
			cooperation with relevant stakeholders, driving progress in the value chain through
			responsible procurement practices and favorable national frameworks'. However,
			no details found of the process it follows to determine a living wage, including with
			relevant trade unions or equivalent worker bodies. [Fulfilling Our Commitments
			(website), N/A: <u>jasolar.com</u>]

J. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.M	Environmental impact assessment and remediation	0	The individual elements of the assessment are met or not as follows: Not Met: Expectation for business partners to conduct EIA: The company's Sustainability Report and ESG Report states that 'JA Solar has always pursued the path of green development, providing clean and efficient energy to users worldwide. It also practices green production and forges an environmentally friendly enterprise. The Company actively identifies and complies with relevant laws and regulations while continuously improving and implementing the environmental management system under the guidance of laws and regulations, such as the Environmental Protection Law of the People's Republic of China, the Environmental Impact Assessment Law of the People's Republic of China, and the Management Measures for Legal Disclosure of Enterprise Environmental Information'. No reference has been found, however, in relation to requirements of EIAs for project developer partners (customers) [2022 Sustainability and ESG Report, 2023: jasolar.com] & [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com
J.2.M	Life cycle assessment	0	The individual elements of the assessment are met or not as follows: • Not Met: Conducts regular public life cycle assessments: Although the Company reports on 'full-life-cycle sustainability' including raw materials, product design and waste management, no evidence was found that it undertakes regular public life cycle assessments of its primary technologies. [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] • Not Met: Reports on progress made on action plan

K. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.M	Anti-corruption due diligence and reporting	0	The individual elements of the assessment are met or not as follows: Not Met: Commitment to prohibiting bribes to public officials: The Code of conduct states that 'We will not offer, promise, authorize or give bribes. We will not ask for or agree to accept bribes. Business hospitality offered to others shall comply with all applicable laws and company policies. We will not give or offer anything of value as an unlawful inducement to purchase, lease, use or recommend the purchase, lease or usage of our products or services. Our interactions with customers will not violate any law, but comply with applicable professional or industrial codes. The prohibition shall extend not only to direct bribery behaviour to clients, but also to any form of bribery behaviour through consultants or other third parties. However, no evidence was found on a commitment on bribery of public officials and their relatives/associates. [JA Solar Code of Conduct, 2024: jasolar.com Not Met: Expectation extends to relevant business relationships: The supplier code of conduct states that 'No Bribery. Our suppliers may not engage in bribery with anyone for any reason, whether dealings with government officials or the private sector. This includes offering, promising, giving, or accepting anything of value to obtain or provide undue or improper advantages to anyone for any reason. Anti-Corruption. Suppliers must comply with applicable anti-corruption laws, and never bribe a government official on JA Solar's behalf. Suppliers may not offer, give, or promise anything of value, either directly or indirectly, to government officials to encourage them to act improperly or to reward them for doing so. Prohibited payments can take many forms including, but not limited to, cash or cash equivalents, gifts, meals, and entertainment'. No evidence was found, however,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			that this extends to suppliers' business relationships. [Supplier Code of Conduct, N/A: jasolar.com] • Not Met: Reports on any complaints on corruption and bribery: Although the Company reports that there are no lawsuits or cases involving corruption, no evidence was found on whether there are any corruption or bribery concerns reported through its grievance mechanisms. [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com]
K.2.M	Payments to governments & contract transparency	0	The individual elements of the assessment are met or not as follows: Not Met: Publishing a tax CbCR in line with GRI 207-4, or Not Met: Disclosure of terms, contracts, agreements for those payments Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI Not Met: Expectation for project developers clients to disclose payments to governments at project level (including on land and natural resources)

L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.1.M	Diversity, equality & inclusion training for management and employees	0	The individual elements of the assessment are met or not as follows: Not Met: Provides mandatory and regular training as per ILO No 190 Not Met: Requires suppliers to provide training Not Met: Provides materials and access to resources for trainings Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it
L.2.M	Gender balance and sensitivity	0.5	The individual elements of the assessment are met or not as follows: Not Met: Timebound action plan to integrate gender lens to all relevant documents Not Met: Demonstrates progress through annual reporting Not Met: Women and non-binary people make up at least 40% of the Company's executives: Not met. According to the 2022 Sustainability Report and ESG Report, the "percentage of female in the board of directors" is 33%. [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] Met: Women and non-binary people make up at least 40% of the Company's board of directors: The report states that the 'percentage of female members in Supervisory Board' is 67% [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com]
L.3.M	Gender wage gap reporting	0	The individual elements of the assessment are met or not as follows: Not Met: Has closed gender wage gap or timebound commitment Not Met: Reports information at company level across multiple pay bands Not Met: Expects business relationships to do the same

JT. Just transition

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.3.M	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	0	The individual elements of the assessment are met or not as follows: Not Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition. Not Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders. Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups
JT.4.M	Fundamentals of retaining and re- and/or up- skilling workers for an inclusive and balanced workforce	0	The individual elements of the assessment are met or not as follows: • Not Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy. • Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition. • Not Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders. • Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups.

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.6.M	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition	0	The individual elements of the assessment are met or not as follows: Not Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition. Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition. Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition. Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection

3.a Response to risk of exposure to forced labour (10% of total) Indicator Code Indicator name Score (out of 2) Explanation

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of		Area: Exposure to high risk of forced labour
	supply chain forced labour		• Story: According to recent data, approximately 35% of the world's polysilicon,
			and 32% of global metallurgical grade polysilicon, the material from which
			polysilicon is made, is produced in Xinjiang Uyghur Autonomous Region (XUAR).
			Investigations by UN bodies, academics and journalists have presented evidence
			on a number of human rights abuses including the use of forced labour in XUAR. In
			its July 2022 report to the UN General Assembly, the UN Special Rapporteur on
			Contemporary Forms of Slavery "regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in
			the Xinjiang Uyghur Autonomous Region of China" and finds that some instances
			of forced labour in the Region "may amount to enslavement as a crime against
			humanity". The Special Rapporteur states he "considers that indicators of forced
			labour pointing to the involuntary nature of work rendered by affected
			communities have been present in many cases" in the context of "State-mandated
			systems". Further analysis by independent UN experts concluded that the
			violations in the Region "may constitute international crimes, in particular crimes
			against humanity" and have urged China to address their "repeatedly raised
			concerns about widespread violations of the rights of Uyghurs and other Muslim
			minorities in the Xinjiang Uyghur Autonomous Region (XUAR) on the basis of
			religion or belief and under the pretext of national security and preventing extremism".
			[United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery
			affecting persons belonging to ethnic, religious and linguistic minority
			communities - Report of the Special Rapporteur on contemporary forms of slavery,
			including its causes and consequences": documents-dds-ny.un.org [United
			Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address
			grave human rights violations and the world must not turn a blind eye, say UN
			experts": ohchr.org [International Service for Human Rights, "Repository of United
			Nations recommendations on human rights in China": ishr.ch] [Business and
			Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global sola
M(0).1	Publication of		The individual elements of the assessment are met or not as follows:
(0).1	independently		• Not Met: Public commitment to full solar supply chain transparency: In its 2023
	verified full	0	Sustainability Report, JA Solar states that it "prohibits the employment of child
	solar panel		labor and forced labor and has established a raw material traceability mechanism.
	supply chains		At the same time, it carries out the management of critical minerals and supply
	to raw		chain labor."
	materials level,		The same and has also liketablished a same later country to the interest 199
	including		The company has also "established a complete supply chain traceability map and
	names of		applied internal systems like a traceability system and Manufacturing Execution System (MES) for data support, ensuring the traceability and controllability of the
	suppliers and		sources of raw materials."
	locations for all		
	destination		As part of its Responsible Sourcing Policy, JA Solar also requires its suppliers "to
	markets		seek to trace materials and products by way of supply chain mapping from the
	markets		source to the final product and by following any of JA Solar's reasonable
			traceability instructions." While the company requires its suppliers to conduct a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			mapping of their own supply chains, the company itself has not made any public commitment to a full transparent mapping of its own supply chain.
			However, it is not clear how the Company ensures supply chain traceability beyond tier 1 of its supply chain. Furthermore, the traceability map described is not meeting the requirements of this indicator to be transparent. [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [Responsible Sourcing Policy, N/A: jasolar.com] • Not Met: Publication of verified full solar supply chains: A Solar avoid situations where production and operation may involve the use of conflict minerals, the Company adheres to ethical procurement practices to, conducts due diligence on the mineral supply chains for which they are responsible, and ensure the traceability and controllability of minerals used in the supply chain.
			In 2023, "JA Solar carried out mineral tracing on junction boxes and solder strips involving the use of conflict minerals (Tin) and disseminated conflict minerals questionnaires that were developed based on Conflict Minerals Reporting Template (CMRT) principles issued by Responsible Minerals Initiative (RMI) to all suppliers of metal raw materials of PV solder strips and solder wires, with a traceability ratio of 100%. The survey results showed that there is only one type of conflict mineral (Tin) sourced from JA Solar's suppliers, and no other conflict mineral materials involved. The metal "Tin" used by our suppliers was sourced from RMI-certified compliant Tin smelters list. JA Solar was not found to be using conflict minerals throughout its supply chain in 2023."
			However, no publication of an independently verified mapping of the Company's full solar panel supply chain down to the raw materials level was found. [2023 JA Solar Sustainability and ESG Report, 2024: jasolar.com] & [Responsible Sourcing of Minerals Statement, N/A: jasolar.com]
M(0).2	The company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships)	0	The individual elements of the assessment are met or not as follows: Not Met: Steps taken aligned with UNGPs Not Met: Information relevant to all destination markets

3.b Serious Allegations (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious		No allegations meeting the REB severity thresholds under this heading were found
	allegation No 1		

Disclaimer

This scorecard is based on assessments of publicly available documents on companies' websites by the EIRIS Foundation and BHRRC. Preliminary assessments were shared with companies for feedback. Feedback provided by companies has been analysed and incorporated when relevant to the indicator assessed. Information published or provided by companies after established and communicated cut-off dates* are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of April 2025.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

While the EIRIS Foundations and BHRRC have made reasonable endeavours to ensure that the methodology reflects best and emerging business and human rights practice in identifying, preventing, mitigating and remedying human rights harms as well as other responsible business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.

Scores for companies in the different project developer sub-categories (electric utilities, oil and gas, independent power producers) should not be compared to one another as these categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production for project developers and oil and gas companies, based on the World Benchmarking Alliance's Oil & Gas and Electric Utilities Benchmark, using ACT methodologies. Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developer scores as indicators have been tailored to reflect their position in renewable energy value chains.

Caution should be exercised in interpreting small differences in scores between companies within the same category and particularly small differences in the overall weighted scores because of the diversity of independent elements that are combined to produce the overall weighted scores. Scores should be understood in the context of the methods and weightings explained in the Methodology.

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^{*} Cut-off dates: 31 January 2025 for companies that did not engage with the benchmark; the expiration of the feedback period (25 April 2025) for companies that engaged with the benchmark and provided additional documents published during that period.