Canadian Solar Conflict Minerals Policy

Purpose

The purpose of this policy is to memorialize the commitment of Canadian Solar Inc., on its own behalf and on behalf of its subsidiaries and affiliates ("Canadian Solar" or "the Company"), to comply with: (a) the rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, adopted by the U.S. Securities and Exchange Commission ("SEC") and (b) Regulation (EU) 2017/821 of the European Parliament and of the Council laying down supply-chain due-diligence obligations for Union importers of tin, tantalum, tungsten and gold ("EU Conflict-Minerals Regulation"), and to follow the 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 Guidance").

In addition to its legal obligations regarding 3TG, Canadian Solar may, where required by voluntary industry initiatives or customer requirements, apply due diligence processes modeled on the OECD Guidance to selected materials and supply chains beyond 3TG, including the silicon value chain from quartzite mining through metallurgical-grade silicon and polysilicon production, subject to feasibility assessments, legal requirements, and internal approval procedures.

Policy Commitment

"Conflict minerals" generally refer to minerals originating from conflict-affected and high-risk areas (CAHRA), particularly tantalum, tin, tungsten and gold and their ores ("3TG"). This policy applies globally to any CAHRA, including the Democratic Republic of the Congo (DRC) and its nine adjoining countries, which are expressly listed in key international regulations such as the U.S. Dodd-Frank Act.

Canadian Solar is committed to sourcing 3TG responsibly and does not tolerate any contribution to conflict, human-rights abuses, bribery, money-laundering or other risks listed in Annex II of the OECD Guidance. Canadian Solar's commitment extends to implementing robust due diligence on its 3TG supply chains and performing reasonable country of origin inquiries, following the OECD's recommended five-step framework:

1. **Establish company management systems.** Canadian Solar is establishing robust policies and management systems overseeing its efforts for the responsible sourcing of minerals. This includes structuring internal management to support supply chain due

diligence and establishing controls and transparency over the Company's mineral supply chain.

2. **Identify and assess risks in the supply chain.** This includes Canadian Solar identifying and assessing actual and potential risks in the Company's supply chain, with a focus on the risks outlined in Annex II of the OECD Guidance.
3. **Design and implement a strategy to respond to identified risks.** This includes Canadian Solar reporting its findings of risks to designate senior management and developing and implementing a risk management plan. The Company may require suppliers flagged for risks associated with conflict minerals to deliver a remediation plan and adopt corrective action plans to mitigate the associated risks. Should a supplier refuse or fail to mitigate the risks within the stipulated timeline, Canadian Solar reserves the right to suspend or terminate business relationship with the supplier, based on the severity of the risks.
4. **Carry out independent third-party audits.** Where Canadian Solar is subject to independent third-party audit requirements under applicable law, Canadian Solar complies with such requirements. Where appropriate, Canadian Solar may obtain or rely on independent third-party audits, certifications, assessments or other verification mechanisms relating to smelters, refiners, or other relevant entities in its supply chain, provided that such mechanisms are legally permissible and reasonably available.
5. **Report annually on supply chain due diligence.** Canadian Solar reports annually its mineral supply chain due diligence policies, practices and findings through its sustainability report and the Form SD filed with the US SEC. Copies of these reports are available on its website: www.canadiansolar.com.

Supplier Expectations

Canadian Solar communicates this policy to all its suppliers and expects their cooperation and compliance. The Company expects its suppliers to:

1. Conduct reasonable due diligence on the origin and chain of custody of 3TG and selected materials in their products, in a way consistent with the OECD Guidance.
2. Facilitate Canadian Solar's due diligence efforts by providing, upon reasonable request, relevant supply chain information and supporting documentation using legally permissible and Company-approved tools or formats.
3. Execute Canadian Solar's Declaration of Conflict-Free Minerals as a condition of doing business with the Company.

Any supplier found to be in breach of this policy may face termination of its business relationship with Canadian Solar and potential legal action. Canadian Solar plans to provide

training to suppliers to facilitate their understanding of this policy and enhancing their due diligence capabilities.

Grievance and Whistle-Blower Mechanism

Any person who suspects that a violation of this Policy has or may have occurred (or may occur in the future) is expected to notify his or her direct manager, Canadian Solar's Legal Department, and Canadian Solar's Corporate Compliance Office. Any person that is not comfortable notifying any of the foregoing parties should report the suspected breach (or risk of breach) through Canadian Solar's Whistleblower hotline by phone (+1 519 823 7477) or by e-mail (whistleblower@canadiansolar.com). Such notifications will be managed in accordance with Canadian Solar's Whistleblower Policy, which is available online at www.canadiansolar.com.

Canadian Solar encourages feedback regarding actual or potential violations of this Policy and will support any report of a genuine concern made in good faith, even if the report turns out to be mistaken. Canadian Solar is committed to ensuring no one suffers detrimental treatment (including dismissal, disciplinary action, threats or other unfavorable treatment) as a result of reporting in good faith his or her suspicion that a violation of this Policy is or may be taking place in any part of Canadian Solar's business or the business of Canadian Solar's partners.