



FY23

# MODERN SLAVERY STATEMENT

**“ Since our founding more than 25 years ago, Goldwind has held a deep respect for the foundation of human rights. This will never change.”**

**Ning Chen,**  
Chief Executive Officer

# Message from the CEO

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Modern slavery has no place in our business here in Australia and our global supply chains, and we're pleased to publish our fourth Modern Slavery Statement that reports on our efforts in 2023 and focus for 2024 in this important area.

In Goldwind Australia, we now have Modern Slavery Risk Management Plans in place for all our projects, both in construction, and under service that we manage. We are also continuing to deliver and improve, in partnership with our international colleagues, independent social audits on our wind turbine suppliers.

New starters are also undertaking their compulsory modern slavery training, and we have implemented a 24/7 independent third-party confidential external disclosure service that provides a new avenue for employees, contractors, and suppliers to report complaints or a breach of our code of conduct that includes the ability to raise concerns around modern slavery in our supply chains and operations.

We have made considerable improvements on managing modern slavery risks and have more to do ahead of us, all of which is covered in this report.

There has been no identified occurrences of modern slavery in our business and our efforts in this important area will not cease. We will continue raising our standards internally and within our supply chains.

I'd like to recognise our employees, customers, industry stakeholders, partners and suppliers who mutually share the deep respect we have for the foundation of human rights, and the prohibition of any form of child or forced labour, bonded labour, or modern slavery in any form.

Together, our continued efforts will help towards ensuring a brighter tomorrow for the world we live in.



**Ning Chen**  
Chief Executive Officer  
Goldwind Australia

# Introduction

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## Goldwind upholds a deep respect for human rights.

Modern slavery has no place in our business, and we strictly prohibit the use of any form of child labour, forced labour, bonded labour, or the trafficking of persons throughout our company operations and within our global supply chain.

This is our fourth Modern Slavery Statement (the **Statement**) under the Modern Slavery Act 2018 (Cth) (the **Act**) that covers the progress Goldwind Australia has made in our approach towards managing modern slavery risks within our business in FY23 as well as the mandatory reporting criteria (the **Reporting Period**).

This Modern Slavery Statement for 2023 covers the following mandatory reporting entities that meet the financial threshold under the Act;

- Goldwind Australia Pty Ltd ACN 140 108 390, and
- Goldwind Queensland Constructions Pty Ltd ACN 647 057 903.

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# Our organisation

## Reporting entity (mandatory reporting criteria)

This document is a Modern Slavery Statement pursuant to section 13 of the Act for the following reporting entities:

- Goldwind Australia Pty Ltd ACN 140 108 390, and
- Goldwind Queensland Constructions Pty Ltd ACN 647 057 903.

The Reporting Entities are Australian proprietary limited companies incorporated under the Corporations Act 2001 (Cth) and registered with ASIC.

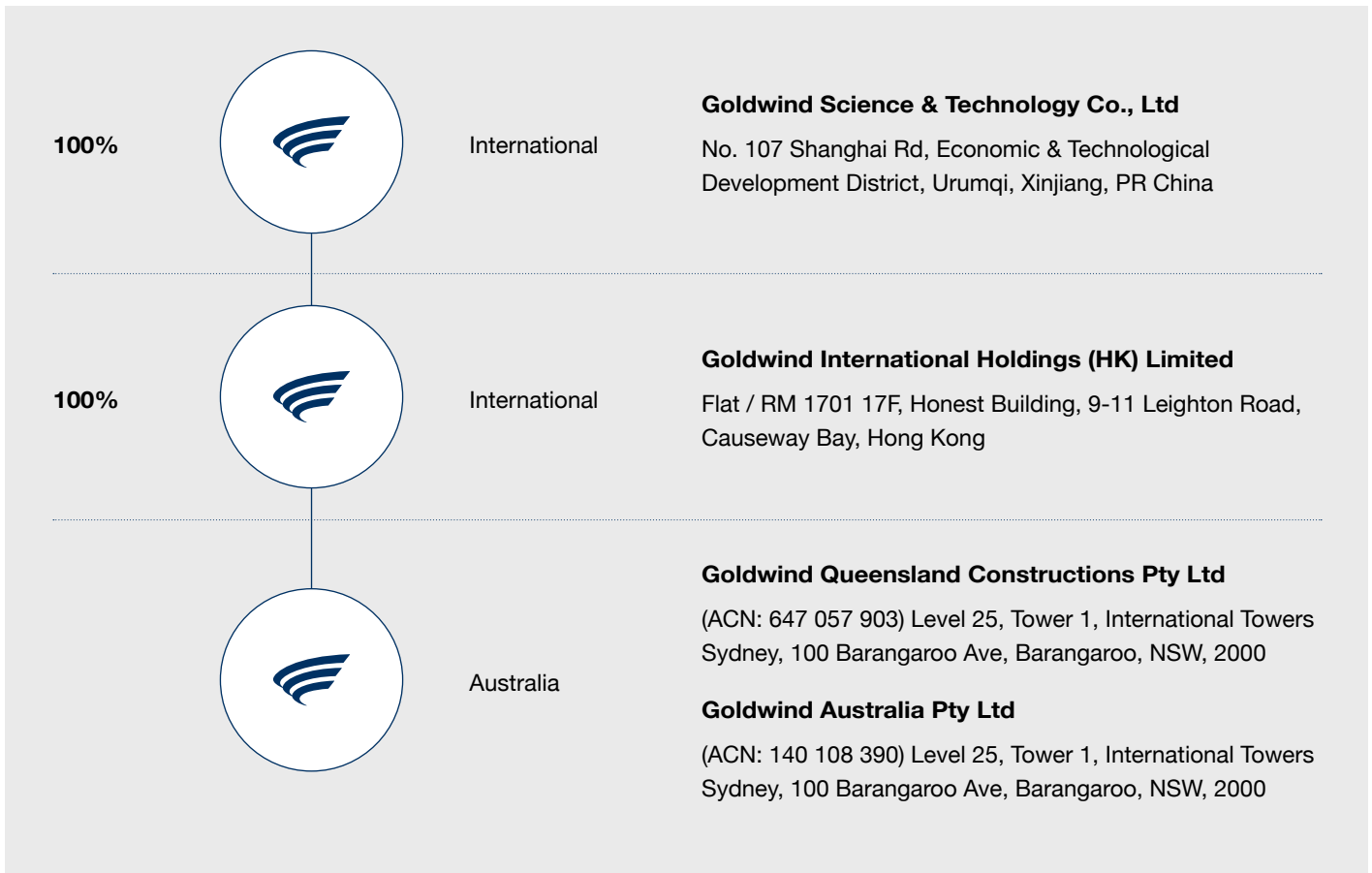
Goldwind Australia Pty Ltd is Goldwind's main operating entity in Australia for all projects across Australia except Queensland and Tasmania. Goldwind Queensland Constructions Pty Ltd is Goldwind's main contracting entity for projects in Queensland.

## Company structure (mandatory reporting criteria)

The Reporting Entities are wholly owned subsidiaries of Goldwind International Holdings (HK) Limited, a company incorporated in Hong Kong, which is itself a wholly owned subsidiary of Goldwind Science & Technology Co., Ltd, a company publicly listed on two stock exchanges — the Shenzhen Stock Exchange (SZSE: 002202) and the Stock Exchange of Hong Kong Limited (HK: 2208).

The global Goldwind business covers 38 countries across six continents and is supported by over 10,000 employees worldwide. Since its founding more than 25 years ago, the company has installed over 49,000 wind turbines, with a global installed capacity exceeding 111GW.

For more about Goldwind Science & Technology, including its growth strategy, corporate sustainability and human rights commitment, including our annual sustainability reports, and company reports, please visit our corporate website at [www.goldwind.com](http://www.goldwind.com).



Corporate structure chart for the Reporting Entities including registered addresses for each entity.

## Operational structure (mandatory reporting criteria)

The Reporting Entities carries out the following types of business within the renewable energy sector in Australia:

- **Development business**  
Investment, acquisition, and development of renewable energy projects.

- **OEM (original equipment manufacturer) business**  
The sale and supply of wind turbine components and the construction and installation of renewable energy projects.
- **Services business**  
The servicing, maintenance, and asset management of renewable energy projects.
- **Energy management business**  
The management of wholesale trading relating to renewable energy projects.

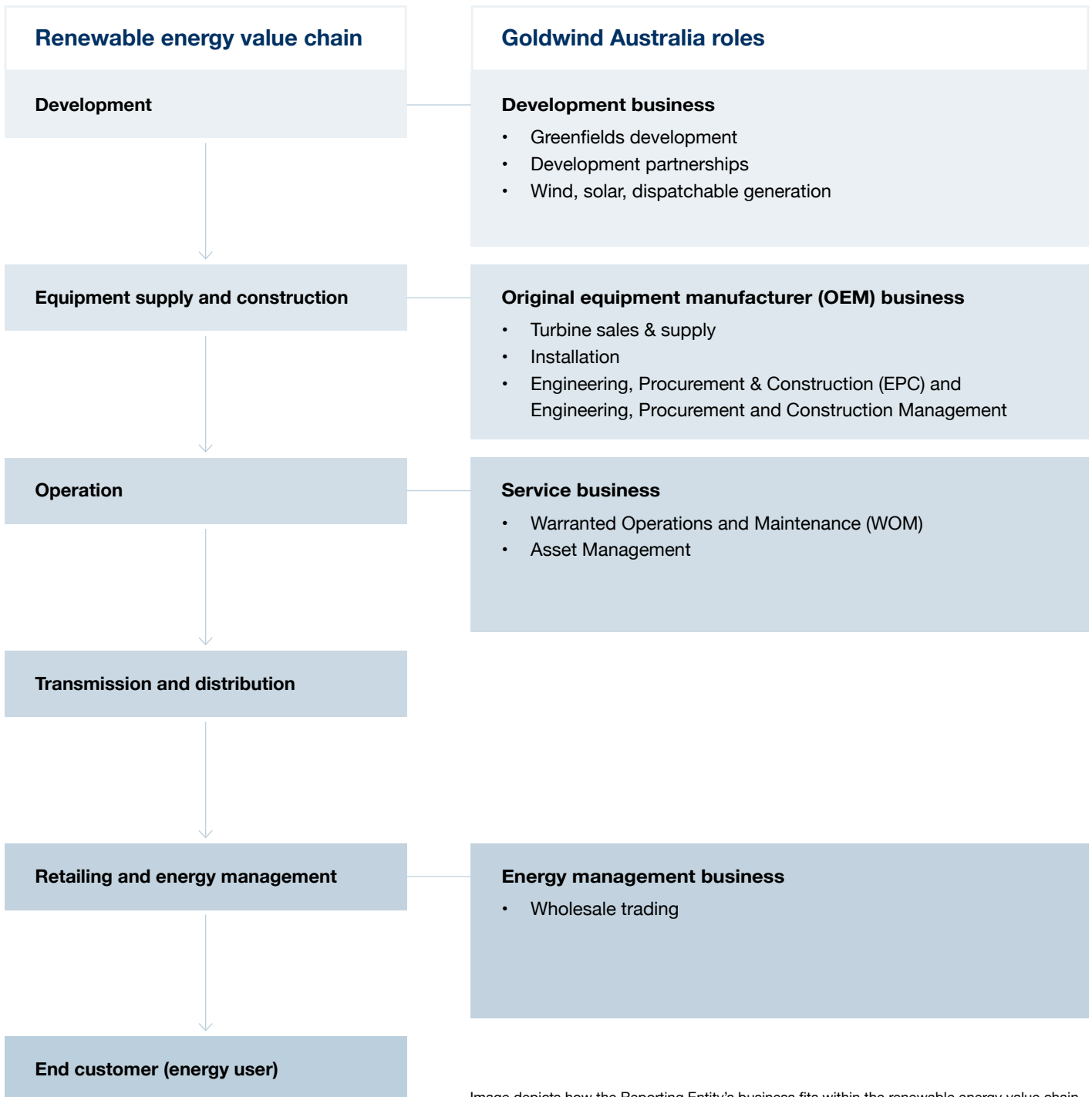


Image depicts how the Reporting Entity's business fits within the renewable energy value chain.

The operational structure of the Reporting Entities consists of the following departments:

- Development & Investment
- Sales & Marketing
- Program Delivery
- Service
- Grid
- Finance
- Technical Services
- Corporate Services\*

\*comprising People and Culture, Cybersecurity and Digital Transformation, ESG & Government Engagement, Legal, and HSEQ (Health, Safety, Environment & Quality)

As at 31 December 2023, the Reporting Entities directly employed 240 employees.

The Reporting Entities operates from three corporate offices in Sydney, Melbourne, Perth, and project sites across Australia within the following States:

- New South Wales,
- Victoria,
- Tasmania,
- Queensland, and
- Western Australia.

The Reporting Entities are the main contracting entity for all projects in Australia outside of Tasmania but, in practice, the Reporting Entity and its related entities operate as a single business across Australia.

During the Reporting Period, projects were in various phases of development, construction, and operations. Some of these projects are wholly or partially owned by companies within the Reporting Entities' corporate group, and other projects are wholly owned by third parties.



## Supply chains (mandatory reporting criteria)

The main direct supply chains of the Reporting Entities can be divided into the following categories:

### Procurement of goods

Including wind turbine, battery storage energy system (BESS) and renewable energy components (e.g. generators, hubs, nacelles, blades, towers, etc.) and other major electrical plant and equipment required to construct renewable energy projects (e.g. cranes, powerlines, substations, synchronous condensers, etc.), personal protective equipment and clothing, technology software and hardware, and office stationery.

### Construction, installation, and logistics subcontracts

Including subcontracts entered into for the construction, installation and logistics of renewable energy projects covering all necessary civil and electrical work on site and the delivery and installation of major components to site. Throughout the on-site works there is typically a significant number of personnel on-site, across a range of subcontractors to undertake the necessary works. Where workers are not residents of the local area to the project, they are accommodated in a range of options such as project camps or long term residential rental properties, or other accommodation arrangements such as local hotels if extended stays are required.

### Asset management services

Engineers and technicians performing onsite servicing and maintenance work for renewable energy projects.

### Professional consultancy services

Including professional services, engineering, environmental, planning, legal, accounting, financial, energy trading and recruitment performing office-based and on-site consultancy services to support its activities both at a corporate level and at a project level throughout the life cycle of its renewable energy projects. Where overnight travel to project sites is required, they are usually accommodated in local hotels or motels.

### Outsourced services

Including for information technology (I.T.) technical support, contract and claims management and staff payroll.

### Support services

Services ancillary to its operations such as fleet, labour-hire, equipment-hire, software, cleaning, and security.

The Reporting Entities procure the majority of the major wind turbine components described above from its parent companies in China and wherever possible, some of the wind turbine tower components from local Australian manufacturers. The Reporting Entities procure the remainder of the above goods and services locally in Australia from suppliers predominantly based in Australia.

From time to time, the Reporting Entities may use specialist technical expertise from overseas suppliers where required to undertake some of the above services (e.g. for technical engineering or commissioning services).

The Reporting Entities aim to utilise local suppliers and service providers within the local area or State of its project sites wherever possible (e.g. for civil and electrical construction work, met mast installation, off-site road works, procurement of transformers, etc.). This is delivered through a number of strategies including local employment workshops and participation in local industry networks such as the ICN Gateway that has helped the Reporting Entities see high levels of local industry participation in its projects.

In addition, the Reporting Entities aim to employ locals to operate and maintain its projects post-construction over their lifetime. The Reporting Entities also engage closely with key subcontractors to ensure local employment is encouraged.

# Understanding our modern slavery risk areas

## Mandatory reporting criteria

### Our approach

We see modern slavery as including:

- Human trafficking,
- Slavery,
- Servitude,
- Forced labour,
- Debt bondage,
- Deceptive recruiting for labour or services,
- Forced marriage, and
- Any form of child labour.

Modern slavery risk describes the potential adverse harm to people that a business can have across their operations and supply chain.

We acknowledge that there are inherent modern slavery risks within our business that need to be continually identified, assessed, mitigated, and addressed as part of our responsibility to respect human rights.

In our previous Reporting Period (FY22), we appointed a leading independent human rights and social impact services specialist (**MS Specialist**) to identify key areas of inherent modern slavery risk across our operations and supply chain, which we have disclosed in our previous Statements.

As part of the inherent risk identification process, the MS Specialist also identified four inherent risk indicators as part of the inherent risk identification process that are;

#### **Presence of vulnerable populations**

People and communities that are inherently more vulnerable than others to experiencing modern slavery and its impacts. Examples include base-skilled labour, migrant labour, and non-native language speakers.

#### **High risk business models**

Certain businesses and supply-chain structures that limit visibility of workers and their working conditions are associated with modern slavery. Examples include outsourcing and labour-hire, aggressive pricing strategies, long and complex supply chains and seasonal labour demand.

#### **High risk sectors and categories**

Certain sectors and categories are more likely to contribute to modern slavery due to prevalent labour rights issues throughout the value chain. Examples include cleaning and security services, logistics and transport, mining, and processing of conflict minerals.

#### **High risk geographies**

Modern slavery is more likely to occur in geographic areas where there is a weak rule of law, conflict, corruption, displacement, and poor adherence to labour laws.

## Identified areas of inherent modern slavery risk (mandatory reporting criteria)

Together in partnership with the MS Specialist in 2022, we identified areas of heightened risk based on a risk assessment of our operations and supply chain. It is important to note that these areas represent inherent modern slavery risks only.

These areas were highlighted in our previous Statements and continue to be areas that require a dedicated focus to manage the inherent modern slavery risk.

As much as these areas have not changed for this reporting period, we will continue to assess these areas yearly to ensure they are kept updated to reflect our global landscape and evolving risk areas.

Area	Description	Description of identified inherent risk indicators
<p><b>Wind turbine components</b></p>	<p>Includes all components that make up a wind turbine, including the wind turbine tower sections, blades, and generators.</p> <p>These components are sourced from Goldwind Australia's parent companies Goldwind Science &amp; Technology Co., Ltd and Goldwind International. Goldwind's parent companies manufactures and sources the majority of its wind turbine components in China, through various manufacturers that specialise in heavy steel fabrication, fibreglass and other material processing and manufacturing.</p>	<ul style="list-style-type: none"> <li>• Our parent companies and suppliers have manufacturing centres throughout China.</li> <li>• Raw materials and minerals that are used for wind turbines, may be mined from areas that have significant human rights issues with low labour rights protections.</li> <li>• Wind turbines have a relatively deep supply chain - from raw materials, processing, manufacturing, logistics - this makes it harder to monitor and verify labour standards across the entire supply chain.</li> </ul>
<p><b>Third-party arrangements and labour hire</b></p>	<p>Includes all third-party labour arrangements engaged by Goldwind Australia such as the following:</p> <ul style="list-style-type: none"> <li>• Electrical and mechanical trade roles are often outsourced via contract and subcontracting arrangements,</li> <li>• Labour hire is used in both office and regional asset/construction settings,</li> <li>• Sub-contracting of land transportation,</li> <li>• Labour hire agencies are engaged to fill roles including construction workers, project-based work including document controllers and project managers and other office- based roles.</li> </ul>	<ul style="list-style-type: none"> <li>• Third-party arrangements, sub-contracting and the use of labour hire agencies are all considered to be high risk business models as they potentially create multiple layers between Goldwind Australia and the project workforce, therefore limiting visibility over recruitment and labour practices.</li> <li>• The use of contractors and subcontractors overlaps with vulnerable populations including base-skill, migrant, low socioeconomic, or culturally and linguistically diverse backgrounds workers that are vulnerable to systemic issues such as underpayment, withholding of wages, and excessive working hours.</li> </ul>

Area	Description	Description of identified inherent risk indicators
<p><b>Shipping</b></p>	<p>Refers to the transportation by sea of wind turbine components and parts.</p> <p>Wind turbine components are extremely large and heavy, requiring specialised project cargo ships for transportation.</p>	<ul style="list-style-type: none"> <li>• The shipping industry is a high risk sector due to the limited oversight and monitoring of working conditions when vessels are in transit.</li> <li>• There are vulnerable populations working in this sector, including base-skill, migrant, low socioeconomic, and culturally and linguistically diverse workers who are vulnerable to issues such as debt bondage and excessive working hours.</li> </ul>
<p><b>On land logistics</b></p>	<p>Includes the storage and transport of the wind turbine components on land in Australia. This includes the removal of the components onto land, the storage of these components onshore and the transportation by road transport of the wind blades, generator, and tower.</p> <p>Goldwind Australia is responsible for the logistics at the point in which these components are lifted and ‘hanging off a hook’ from the ship. There are a limited number of companies who can provide these services due to the size of the components involved.</p>	<ul style="list-style-type: none"> <li>• Warehousing and transport services are considered high risk for modern slavery as this sector has a high prevalence of vulnerable workers.</li> <li>• Sub-contracting and short-term contracts are also common in the logistics business model, which may limit Goldwind Australia’s visibility over working conditions.</li> </ul>
<p><b>Facilities management</b></p> <p>Continued on next page</p>	<p>Includes cleaning, security, catering, waste, and maintenance services engaged by Goldwind Australia across corporate offices, wind farm assets and on-site accommodation.</p>	<ul style="list-style-type: none"> <li>• Facilities management services commonly have low barriers to entry. A high proportion of employees are on temporary visas and are not native English speakers, which make these workforces particularly vulnerable to exploitation and modern slavery practices.</li> <li>• Cleaning services are considered to be a high-risk industry in Australia due to prevalence of breaches of workplace laws, proliferation of fraudulent contracting arrangements, below minimum wage payments and poor job security, occupational health and safety issues and poor ethical treatment of workers.</li> </ul>

Area	Description	Description of identified inherent risk indicators
<b>Facilities management</b>  Continued	<p>Includes cleaning, security, catering, waste, and maintenance services engaged by Goldwind Australia across corporate offices, wind farm assets and on-site accommodation.</p>	<ul style="list-style-type: none"> <li>• Security services are also considered a high-risk sector in Australia due to high levels of sub-contracting, fraudulent contracting and poor working conditions and pay.</li> <li>• Facilities management services also use labour-hire agencies to fill labour shortages, which further decreases the visibility of the supply chain.</li> </ul>
<b>Personal protective equipment (PPE)</b>	<p>Comprises of all the standard equipment used to protect Goldwind Australia employees and those entering Goldwind Australia sites, such as hard hats, safety glasses, high visibility workwear and jumpsuits.</p> <p>PPE is sourced by Goldwind Australia from multiple suppliers based in Australia who have supply chains both in Australia and overseas.</p>	<ul style="list-style-type: none"> <li>• The PPE and related garments and textiles industries are considered be a high risk sector due to widely reported issues with poor working conditions and exploitative labour practices.</li> <li>• PPE is primarily manufactured in Asia – where there are many high risk countries in relation to poor labour practices and protections, increasing the likelihood of modern slavery practices.</li> </ul>
<b>ICT hardware</b>	<p>Includes mobile phones, laptops, tablets, monitors, and e-waste.</p>	<ul style="list-style-type: none"> <li>• Global ICT hardware supply chains are long, opaque, and complex involving many tiers, limiting Goldwind Australia’s visibility of working conditions throughout the supply chain.</li> <li>• These products are commonly manufactured utilising base-skilled workers in high risk countries/regions such as Asia and South East Asia.</li> <li>• There are known allegations of poor labour conditions in the ICT hardware supply chain including extremely low wages, long working hours, child labour and restrictions on freedom of association and right to collective bargaining.</li> </ul>

Area	Description	Description of identified inherent risk indicators
<b>Chemicals</b>	Includes the range of chemicals, particularly oils and lubricants used by Goldwind Australia in the installation and maintenance of wind turbines.	<ul style="list-style-type: none"> <li>As much as Goldwind Australia predominantly uses Australian-based suppliers, these products are commonly mined and processed from areas that have significant human rights issues with low labour rights protections.</li> </ul>
<b>Balance of plant materials</b>	<p>Refers to the various supporting and auxiliary components of a power plant system required to produce energy.</p> <p>This plant includes electrical items like inverters, transformers, switchgear, and circuit breakers. Goldwind Australia subcontracts the building of balance of plants including the procurement of all components to electrical engineering consultancies.</p>	<ul style="list-style-type: none"> <li>The uncertain origin of the materials used in the manufacturing of balance of plant components and the location of manufacturers heightens the risk of exposure to modern slavery, particularly in relation to high risk sectors and geographies.</li> </ul>
<b>Solar modules</b>	<p>This category includes all components of a solar panel modules, importantly this includes polysilicon used in solar photovoltaic (PV) technology. Goldwind Australia is not currently actively procuring solar products, and it has not procured any solar modules in FY23, however it currently services one solar farm in New South Wales and which is 100% owned by another corporate entity within the Goldwind corporate group.</p> <p>This area has been identified on the basis that the current solar farm, or potential future commercial ventures may require solar modules to be procured directly or indirectly for Goldwind Australia. As such, the modern slavery risks associated with this product will need to be considered.</p>	<ul style="list-style-type: none"> <li>In recent years, media and non-government organisations have published allegations of forced labour within the global solar supply chain.</li> <li>There is a heightened inherent risk of modern slavery in relation to high risk sectors and geographies for solar cell manufacturing or solar products or modules incorporating solar-grade polysilicon.</li> </ul>

# Our actions to assess and address modern slavery risks

## Mandatory reporting criteria

Following on from our effort to develop our foundational processes in the last two reporting periods, this past year has been focused on developing and operationalising our approach to Modern Slavery in our business.



### Modern Slavery Policy and Supplier Social Responsibility Code of Conduct

Goldwind Australia's Modern Slavery Policy forms the basis of our commitment and approach to addressing modern slavery in our operations and supply chains and applies to all persons working for Goldwind Australia or on its behalf in any capacity, including agency workers, seconded workers, agents, contractors, external consultants, third-party representatives, and business partners.

Our Supplier Social Responsibility Code of Conduct outlines our requirements for our suppliers around labour rights, human rights, health and safety, environment, business ethics and management systems. The Supplier Social Responsibility Code of Conduct promotes the implementation of corporate social responsibility including modern slavery and is applicable to all suppliers who conduct business with Goldwind Australia or participate in any activity related to Goldwind Australia.

Both these important documents have been reviewed and updated in the Reporting Period and will continue to be reviewed over the upcoming Reporting Periods to reflect Goldwind Australia's maturing modern slavery management and governance approaches.



### Modern Slavery Risk Management Framework

A large effort has been placed in the reporting period to operationalise our Modern Slavery Risk Management Framework that helps us take a risk-based approach to effectively assess our inherent risk areas (see section above) and sets out a clear framework and approach on how, as a business, we utilise our training, risk identification process and action plans including contractual clauses and formal acceptance of our Supplier Social Responsibility Code of Conduct to manage supplier modern slavery risks.

This Framework has been reviewed and improved a number of times since we partnered with the MS Specialist on its initial formulation, with project managers who construct our wind farms, service managers who manage our wind farms, and most key functional employees who undertake procurement or engage suppliers are now trained on this Framework.



### Modern Slavery Risk Management Plans for all our projects

At the end of the Reporting Period, in line with our previous reporting commitments, project and service managers were trained and delivered Modern Slavery Risk Management Plans for their respective construction and service sites.

These plans, individually tailored locally to each project and site, set out the modern slavery risk management framework, approach and methodology for identifying, assessing, monitoring, addressing and reporting on modern slavery risks.



### Capability building

Building our capability to understand, identify and eliminate modern slavery from our business will continue to remain a priority and our people are key to enabling this.

As at the end of the Reporting Period, 92.5% of all Goldwind Australia employees have completed their compulsory modern slavery training including new starters in the business. This training, available online, was launched at the end of FY2022 and was delivered by the MS Specialist in partnership with Goldwind Australia's Head of Environmental, Social and Governance (ESG) to provide employees with a well-grounded understanding of what modern slavery is and how they can identify modern slavery risks.

Our intention in 2024 is to update this compulsory training and relaunch it to all employees by the end of 2024.

Further to training key stakeholders on the Modern Slavery Risk Management Framework and Modern Slavery Risk Management Plans, close engagement and briefings with the Goldwind Australia's Executive Management Team will continue, along with organisation-wide communications including the promotion of Goldwind Australia's Modern Slavery Statement that will be communicated and available to all employees, customers and key stakeholders.





## Independent audits

In addition to our Tier 1 wind turbine supplier manufacturing facility yearly CSR audits that our parent company conducts through external providers, for the second year running, the Reporting Entities appointed a globally-recognised leader in Testing, Inspection and Certification (TIC) to conduct on-site ESG audits on the manufacturing facilities of the suppliers for our main turbine components in China.

These external audits followed a customised audit checklist that covered topics such as Social & Labour, Business Ethics, Health & Safety and Responsible Procurement. These audits covered topics related to modern slavery but also dived deeper to understand the broader working conditions, labour practices and suppliers' visibility of their suppliers. The questions asked within the checklist have been developed in line with a range of industry standards such as the International Organisation for Standardisation (ISO); Business Social Compliance Initiative (BSCI); Supplier Ethical Data Exchange (SEDEX) and Social Accountability International (SA 8000) to name a few.

Each initial external audit was conducted on-site by two experienced, local auditors who have extensive knowledge on relevant local legislation, the language and cultural sensitivities. These audits consisted of an opening meeting, site walkthrough, documentation review, worker interviews and a closing meeting.

All initial audits were completed earlier in the Reporting Period where non-conformances were identified with many closed within a few months. Follow-up audits were completed later in the Reporting Period to verify the closure of all remaining non-compliances. It should be noted that the audits found no evidence of any modern slavery within the manufacturing facilities audited.



## Grievance mechanism

Our Whistleblower Policy and Complaints Policy continue to be in place at Goldwind Australia where both internal employees and suppliers and their workers can raise a grievance.

Our employees have also been encouraged in ongoing communication as well as through the modern slavery training to report any suspected unethical, illegal or improper behaviour or suspected incidents of modern slavery through a number of channels including their manager, line of business Executive, the Head of ESG or the General Manager of Legal and Corporate Services.

We are pleased to also report that during the Reporting Period, we have also launched a 24/7 independent third-party confidential external disclosure service that provides a new avenue for employees, contractors, and suppliers to report complaints or a breach of our code of conduct that includes the ability to raise concerns around modern slavery in our supply chains and operations.



## Accountabilities and governance

The Goldwind Australia CEO has overall responsibility for ensuring that Goldwind Australia complies with its modern slavery commitments and obligations including those outlined in the Modern Slavery Policy and the Act.

The General Manager of Legal and Corporate Services is responsible for the overall monitoring and tracking of modern slavery risks across Goldwind Australia's operations with the Head of ESG role to provide support with dedicated oversight and governance into this important area.

Over the Reporting Period, the Head of ESG has also worked closely and in consultation with stakeholders including internal stakeholders, customers and external consultants to progress the delivery of initiatives highlighted in this Report. Progress around the work we do in Modern Slavery is reported back regularly to Goldwind Australia's Executive Management Team as well as more broadly to employees such as through all-staff company communication business updates and intranet articles.



# Assessing the effectiveness of our actions

## Mandatory reporting criteria

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The Head of ESG referenced in the previous section has key performance indicators (KPIs) that include the effective implementation of modern slavery actions as well as the review and continued improvement of current processes and approaches highlighted in the above sections.

Active participation in related bodies such as the Clean Energy Council's Modern Slavery Working Group allows the ability to benchmark, assess, and continue improving on our efforts and actions.

The Reporting Entities will continue to engage with all its key stakeholders including its employees, Executive Management Team, parent company, suppliers and other stakeholders including its customers to assess and gather feedback on the effectiveness of its management and monitoring of modern slavery risks within its operations and supply chain.

# Consultation with associated entities

## Mandatory reporting criteria

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For this Reporting Period, the mandatory reporting entities, Goldwind Australia Pty Ltd (ACN 140 108 390) and Goldwind Queensland Constructions Pty Ltd (ACN 647 057 903) do not have any wholly or partly owned subsidiaries or control any other entities, however they operate in alignment with all related Goldwind International subsidiaries (including project-specific entities) operating in Australia.

All our Australian entities effectively operate as a single business in Australia under the management of one Executive Management Team led by the CEO and so adhere to the same modern slavery policies and processes that apply to the Reporting Entities. The Goldwind Australia Executive Management Team have been made aware of, support and approve the contents of this Statement.

# Planned next steps - commitments for our next (FY2024) reporting period

While key actions and improvements continue to be implemented, we acknowledge that significant investments are required to develop and operationalise a rigorous company-wide Modern Slavery Risk Management Framework.

This Reporting Period has seen a number of actions and initiatives delivered and we recognise and acknowledge that continued effort and investment is needed to develop and operationalise our approach to modern slavery in Goldwind Australia.

Actions we will commit and undertake in the next Reporting Period (FY24) include:

- Key: Continue (C)/ New Action (N)

## Modern Slavery Risk Management Framework & key areas of inherent modern slavery risk

(C) Goldwind Australia commits to reviewing and improving our management of modern slavery risks through our Modern Slavery Risk Management Framework – continually applying a continuous improvement approach based on feedback, efficiency, and effectiveness improvements, and maturing of our approaches in this area.

(N) In partnership with our MS Specialist and, in the spirit of continuing to operationalise our effort, we will be reviewing our key areas of inherent modern slavery risk across our operations and supply chain and seek to enable this review to occur within our business annually. An annual review will allow us to apply governance across emerging areas of our business including battery energy storage systems that will commence over the next year or two.

## Modern Slavery Policy & Supplier Social Responsibility Code of Conduct

(C) Continuing the ongoing revision and updates where needed to our Modern Slavery Policy and Supplier Social Responsibility Code of Conduct to reflect our maturing approach to modern slavery.

## Risk assessment

- (C) We commit to continuing to conduct due diligence on suppliers that are related to or involved in our identified areas of inherent modern slavery risk. As part of operationalising our efforts and ensuring that risk assessments are conducted across our business, we commit to:
- (N) having a modern slavery risk management plan for any new project commencing in 2024.
  - (N) conducting an annual review of all the modern slavery risk management plans we have in place for each of our service projects/sites in 2024.
  - (N) reviewing and looking to improve the efficiency and effectiveness of our current modern slavery assessment diligence through our procurement and contract approvals for suppliers.
  - (C) continuing to conduct an independent second-party audit on our, and our key suppliers' manufacturing facilities with consideration given to expanding the scope of audit to other areas outside of our wind turbine manufacturing supply chain. This audit will cover areas such as Social & Labour, Business Ethics, Health & Safety and Responsible Procurement and we commit to sharing high-level results in our next report – with detailed results available to our customers and other key stakeholders.
  - (N) working with our international business parent company colleagues to improve and expand on the current Tier 1 turbine supplier and manufacturing facility audits and commence work on identifying high risk raw materials such as balsa wood with the intention of source tracing to identify any modern slavery risks.

## Capability building

- (N) Following on from our compulsory modern slavery training launched at the end of 2022 to help identify and manage modern slavery risks, we commit to refreshing this training and relaunching this to all employees in the next reporting period.
- (C) All new project managers and their key stakeholders will be provided with training prior to their commencement of procurement for their projects to enable better capability in supplier risk assessments and the formulation of their tailored modern slavery risk management plan for their project. Training will also be offered to any new service managers for their sites.
- (N) Functional area General Managers, especially those who have development and procurement functions within their business areas, will be requested to identify any new or existing employees within their business who may require training in the next reporting period, including training on the risk management framework.

## Stakeholder engagement

- (C) We will be continuing the ongoing improvement and promotion of our independent and confidential third party grievance reporting mechanism available to employees, contractors and suppliers.
- (C) We will be continuing to engage with key industry stakeholders and business partners to strengthen our approach to preventing and managing modern slavery risks. This includes ongoing engagement with our employees, suppliers, customers and key stakeholder and the Clean Energy Council to advance industry approaches to manage modern slavery risks within the renewable energy supply chain.

As mentioned in our CEO opening address, our stakeholders are key to our success and in closing this report, we would like to acknowledge and thank our people, our customers, industry and our suppliers who all share the deep respect we have for the foundation of human rights for their support and partnership as we continue to work together to eliminate modern slavery from the world we live in.

# Board, CEO and Executive approval

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Goldwind Australia's Executive Management Team have reviewed and approved the contents of this Statement.

Board of directors approval from each Reporting Entity was obtained for this Statement in accordance with the requirement under the Act.

This statement is signed by the CEO of Goldwind Australia Pty Ltd for the Reporting Period 1 January 2023 to 31 December 2023.

**Signature:**



**Ning Chen**

Chief Executive Officer  
Goldwind Australia

Effective date: 17 May 2024