

Trina Solar (Australia) Pty Ltd 2022 Modern Slavery Statement

www.trinasolar.com/au

Introduction

Trina Solar (Australia) Pty Ltd ACN 150 695 524 is committed to human and labour rights and to the global eradication of modern slavery in all its forms.

Trina Solar (Australia) Pty Ltd (ACN 150 695 524) (hereinafter to be referred to as **"Trina Solar Australia"**), along with its headquarter being a China listed company and its global affiliates (collectively to be referred to as **"Trina Solar"** or **"Trina Solar Group"**), is fully committed to preserving all human and labour rights and to the global eradication of modern slavery in all its forms.

During the course of the current reporting period of financial year ending on 31st December 2022, Trina Solar Australia, had achieved revenue of more than one hundred million Australian dollars, being the threshold under the Modern Slavery Act 2018 (Cth)

In line with the Act, Trina Solar defines "modern slavery" as including the following categories:

- Trafficking in persons
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Deceptive recruiting for labour or services; and
- Child labour.

(hereinafter referred to as the "Act") and, as such, is classified as a reporting entity pursuant to the Act. This statement highlights Trina Solar's areas of risk, the actions that have been taken or are being taken by Trina Solar to actively address such risks, and how Trina Solar measures its effectiveness in eliminating the risk of modern slavery in connection with its operations and supply chain.

Trina Solar continually endeavours to work with its suppliers and stakeholders to raise awareness of modern slavery and commits to effectively communicate our expectations and, where appropriate, take any actions necessary to eradicate modern slavery risks.

About Trina Solar (Australia) Pty Ltd

Trina Solar Australia is the Australian arm and wholly owned subsidiary of Trina Solar Group, whose parent company, Trina Solar Co., Ltd., was founded in 1997 (stock code: 688599.SH) with its headquarter based in Changzhou City, Jiangsu Province, China. Trina Solar Group is the world leading PV and smart energy total solutions provider.

Trina Solar Group is mainly engaged in:

- the research and development, production and sales of PV modules, trackers and storage products;
- PV power stations and system products;
- PV power generation, operation and maintenance services; and
- the development and sales of intelligent microgrids and multi-energy systems, as well as the operation of energy cloud platforms, amongst other things.

Trina Solar Group is committed to leading the way in smart solar energy solutions for a net-zero future. Through constant innovation, Trina Solar Group continues to push the PV industry forward by creating greater grid parity of PV power and by popularizing renewable energy. Trina Solar Group has been consistently ranked as the first tier PV module manufacturer in the world. In addition, Trina Solar Group's downstream business includes solar PV project development, financing, design, construction, operations and management, and one-stop system integration solutions for customers. Trina Solar Group has connected over 5.5GW of solar power plants to the grid worldwide.

As of May 2023, Trina Solar Australia has twenty-three (23) full time employees that range from sales personnel to solar engineers, finance experts and support staff. Globally, Trina Solar Group has more than twenty-three thousand (23,000) employees, and has shipped 43.09GW of PV modules and 4.4GW of trackers throughout the calendar year of 2022. Trina Solar Group now sells PV products in more than one hundred (100) countries, with regional business centre in Singapore, Tokyo, Zurich, Dubai, Fremont and Miami, global sales and office centres in Spain, Mexico, Chile, Italy, Germany, Australia, United Arab Emirates, France, Columbia, Brazil and India, and production bases in Vietnam and Thailand.

Trina Solar Australia provides solar panels to EPC project partners, constructors of solar farms and wholesalers. Its employees in Australia are all engaged through lawful labour contracts as per local laws and are free to associate with their respective unions, as they may see fit.

Trina Solar Group is committed to corporate social responsibility, including eliminating all forms of modern slavery, and to conducting business ethically and in compliance with all laws, rules, and regulations in the places/countries where it operates. This is implemented through our Code of Business Conduct and Ethics, our Social Responsibility Management Regulation, Trina Solar Global Human Rights Principles and various other guiding principles within our suppliers' verification and human resource management systems.

Trina Solar Group believes in being fully transparent with all partners and local authorities and will continue to refine its tools to address any and all modern slavery risks.

Trina Solar Supply Chain

Trina Solar's supply chain covers more than eighty (80) types of procurement products that are broadly spread into the following categories:

These are broadly spread into the categories below:

- raw materials;
- auxiliary materials;
- infrastructure;
- equipment;
- accessories;
- packaging;
- logistics;
- transportation;
- · labour protection supplies;
- office supplies; and
- third-party certification services.

Trina Solar's suppliers are mainly from China, German, Malaysia, Spain and Vietnam and are centrally managed by Trina Solar Group's procurement department in China.

Trina Solar Group now owns and operates several manufacturing production bases respectively in Changzhou, Suqian, Yiwu, Yancheng in China, in Vietnam and in Thailand. In the year of 2022, Trina Solar has started construction of its Qinghai manufacturing facility with its investment amount being over RMB 50 billion, in Qinghai province, China, which will provide a full photovoltaic industry chain and take the lead in building a "zero carbon industrial park integrating source, network, load, and storage" in Xining, Qinghai (hereinafter referred to as "**Trina Qinghai Facility**"). Now, Trina Qinghai Facility has already begun producing the solar ingots by itself and it targets to have sufficient production capacity starting from MG polysilicon in the near future.

To develop and identify potential suppliers, local employment and labour rights are amongst the most important criteria for Trina Solar to eradicate any modern slavery risks all throughout its global supply chain as the above. All potential suppliers are required to commit their compliance with all local labour laws as precondition to be approved as the qualified vendor for Trina Solar Group. More details will be introduced in later sections of this statement as policies, measures, and actions having been taken by Trina Solar.



Modern Slavery Risk Management

Trina Solar Group and Trina Solar Australia have classified modern slavery risks into external and internal categories. The external modern slavery risks are managed by Trina Solar Group's procurement team while any intercompany risks are managed by the human resource and legal & compliance departments of Trina Solar Group and Trina Solar Australia together.

Areas of risks identified by Trina Solar within its business operations include:

- raw material suppliers;
- storage and logistical providers;
- Trina Solar owned and OEM factories;
- distributors;
- installers;
- EPC providers or developers for solar projects;
- research and development partners;
- shareholders;
- consumers (end-users); and
- employees.



Supplier risks are managed through Trina Solar Group's internal procurement practices and the supplier performance evaluation system. These provide our suppliers with a score between one (1) to five (5) in relation to their corporate social responsibility commitments and overall treatment of workers. As part of these systems and overall evaluation, Trina Solar actively seeks information from its suppliers such as their employee turnover ratio, any reported health or ethics code breaches, and a number of other key metrics to ascertain the supplier's level of employee satisfaction.

All information provided by suppliers is assessed against Trina Solar's Code of Business Conduct and Ethics and any failure to comply with the set criteria means either full remediation by the supplier is immediately required or there is immediate suspension of said supplier.

Internally, Trina Solar Group's human resource department periodically updates our employee handbooks to reflect the employee's rights at work in accordance with all applicable laws. Furthermore, we provide online courses to all employees as well as an annual engagement survey to gauge all employees' sentiments on f air treatment, health and safety, benefits, training and so on.

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Policies and Governance

The policies of Trina Solar Group associated with addressing modern slavery risks are contained within the following documents:

Trina Solar's Code of Business Conduct and Ethics

(to be provided upon request);

Trina Solar's Social Responsibility Management Regulation

(http://static.trinasolar.com/sites/default/ files/Trina%20Solar%20Social%20 Responsibility%20Management%20 Regulation.pdf);

Trina Solar Global Human Rights Principles

(http://static.trinasolar.com/sites/default/ files/TrinaSolar_Global_Human_Rights_ Principles.pdf);

2023 Reconfirmation of the Product Stewardship Policy

(http://static.trinasolar.com/sites/default/ files/Product_Stewardship_Policy_2023. pdf).



Trina Solar Group strives to ensure that their products do not incorporate or contain components of materials that have been produced, manufactured or provided using any form of forced labour or slavery. There is a well-established team who are responsible for developing and monitoring compliance in relation to modern slavery, as follows:

- Internal audit;
- Global compliance;
- Legal department;
- Human resources department;
- Procurement department;
- Quality Control; and
- Brand Management.

Trina Solar Group issues its corporate social responsibility report based on a social responsibility assessment, annual inspections and evaluations conducted of all its suppliers (**2022 Sustainability Report** is accessible at <u>http://static.trinasolar.com/sites/default/files/TrinaSolar_CSRreport_ESG_2022_EN.pdf</u>).

Trina Solar Group's global procurement team monitors Trina Solar Group's global supply chain partners to ensure that such partners avoid any involvement whatsoever with forced labour practices.

Actions

In 2022, Trina Solar Group updated its Code of Business Conduct and Ethics, with a strong emphasis on the protection of human rights and fair treatment of all workers. All Trina Solar Group and Trina Solar Australia employees have received the updated Code of Business Conduct and Ethics and were provided with compliance training in order to ensure awareness of the risks of modern slavery and human trafficking. Trina Solar's Code of Business Conduct and Ethics, to which every employee must adhere, defines the company values and guiding principles, including a commitment to conduct business ethically as well as in compliance with alllaws, rules and regulations in the places/countries where doing business.

Labour and legal compliance clauses have always been included as part of the standard supply and/ or service agreements worldwide being applied by Trina Solar Group and Trina Solar Australia.

Additionally, all Trina Solar Group and Trina Solar Australia employees, and all third party partners, are always encouraged to report any suspected violations involving slavery or human trafficking, without fear of retaliation. Suspected incidents can be reported directly to Trina Solar's Compliance Committee through a fully confidential and anonymous hotline, or via email to the report email address: scc@trinasolar.com

Besides, Trina Solar Group sets up an IT traceability system for its customers named Phegda Big Data System, which is continually being updated. Such system can generate trace report of the material of particular shipment of solar modules as required by the customer in advance. Now, Trina Solar Group is updating such traceability system as to include the solar products to be manufactured by Trina Qinghai Facility.

Finally, all new suppliers must sign and execute a letter of commitment/undertaking confirming the lawful employment of all their workers before they are approved as a Trina Solar Group's qualified supplier. Such letter includes a commitment to pay salaries on time and in accordance with local laws and regulations, as well as providing insurance coverage to its employees, strictly abiding by the provisions on working hours in the given jurisdiction and to not recruit workers that are underage or are viewed as forced labour.



Valuation of Effectiveness

Trina Solar acknowledges that it may continue to encounter modern slavery risks and its efforts to mitigate these risks will be an ongoing process. In order to accurately assess and measure the effectiveness of Trina Solar's actions, the company aims to provide updated reports on the following:

- Continued reviews of its key supplier agreements to ensure provisions related to modern slavery are included.
- Continued training provided to all employees to increase awareness of modern slavery risks and subsequent competence evaluations to verify the effectiveness of such training.
- Regular reviews and ongoing monitoring of supplier's responses to Trina Solar Group's supplier KYC questionnaire.
- Self-reporting from Trina Solar Group and Trina Solar Australia's external partners on any identified or suspected modern slavery issue.

Trina Solar's sustainability efforts have been audited since 2014 by EcoVadis, an independent rating auditor, and one of the largest and most trusted providers of independent business sustainability ratings worldwide. Trina Solar Group has continuously been rewarded over the years with outstanding records for protection of the environment and of employee rights in corporate social responsibility performance surveys conducted by EcoVadis (all such certificates are accessible at <u>https://www.trinasolar.com/</u> <u>en-glb/our-company/sustainability-downloads</u>). Trina Solar is also certified with ISO45001 Occupational Health and Safety Management Systems.



Continuous Improvement

Trina Solar acknowledges that, as part of its commitment to implement zero tolerance towards modern slavery within its ecosystem and business on a day-to-day basis, it is necessary to continuously review its risk management system and make improvements where and when necessary.

Trina Solar Group and Trina Solar Australia have identified some key areas for additional focus, and for future development, including:

- continued engagement with employees, external partners and service providers on all topics related to modern slavery risks to ensure full satisfaction with Trina Solar Group expectations and those of all local jurisdictions;
- examining industry codes of conduct and how these may apply to Trina Solar Group and Trina Solar's practices in an improved way on a timely basis;

We remain at your disposal should you have any queries on the above.

Date Signed:

Ding Ying Director

- investigation of any options for the automation and streamlining of Trina Solar Group and Trina Solar's suppliers through third-party solutions; and
- continued measuring of Trina Solar Group and Trina Solar's progress and performance, both internally and externally.

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Jiang Yanhong Director



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