



**MODERN
SLAVERY
&
HUMAN
TRAFFICKING
STATEMENT**

FY 24

**"Simple compliance is more
effective compliance.**

**Effective compliance is a
competitive advantage."**

ZHANG Lei

Founder and CEO

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Introduction

Envision Energy is a world-leading green-tech company committed to becoming a net zero technology partner for global enterprises, governments, and institutions. Encompassing three major business sectors - Smart Wind Turbines, Energy Storage, and Green Hydrogen Solutions, Envision Energy constructs comprehensive solutions for energy transition. It also manages Envision-Hongshan Carbon-Neutral Fund and owns Envision Racing Formula E team, which conquered the Formula E Teams' Championship in 2023.

Envision Energy operates in countries and regions including China, Germany, France, the UK, Spain, Denmark, the UAE, India, Vietnam, Indonesia, Australia, the US, Japan, Mexico, Argentina, and Chile. It has set up over 20 operational headquarters and R&D centres globally, along with more than 50 manufacturing bases.

With its contributions to the global green energy transition, Envision Energy is listed as a "Green Giant" in 2024 "TIME 100 Most Influential Companies" list. Recognized as an "Energy Innovator", the company is also included in Fortune's 2024 "Change the World" list for its major innovations in net-zero industrial parks and full-stack green hydrogen technology, marking its second appearance after 2021. The company also received several accolades for its sustainability performance, including the EcoVadis Gold Medal and the CDP "A List" in 2024. As a

pioneer in net-zero transition, Envision Energy achieved global operational carbon neutrality in 2022 and will leverage technology to accelerate progress toward its 2040 net-zero goal.

Envision Energy earned a spot on Forbes China's "Best Employers" list in both 2022 and 2024. At Envision, people are the most precious assets. To protect and to care for our people, we deem compliance risk management as one of our core competencies. We set up a working environment of integrity and trust. We advocate zero tolerance to breach of compliance rules. There are rules of thumb (also referred to as the Four Compliance Red Lines) within Envision, in which the following behaviors are strictly prohibited:

- Falsification or cheating;
- Breach of confidentiality;
- Abuse of authority for personal interests; and
- Dereliction of duty.

With the expansion and internationalisation of Envision, to deal with emerging compliance challenges, the above values and basic principles, together with detailed rules, are compiled, forming this Code of Conduct (the "**Code**") to guide us through diverse scenarios of critical decision-making.

Introduction

Envision is strongly committed to the preservation and protection of human rights and continuously seeks to improve our practices to combat slavery and human trafficking. As outlined in the Code, Envision is committed to ensuring we:

- Do not use compulsory or forced labor in any of our operations;
- Do not use child labor in any of our operations;
- Comply with applicable laws, industry standards and relevant collective agreements on wages, working hours, breaks, public holidays and compensation in case of overtime;
- Respect freedom of association and the right for employees to be represented by a trade union for the purpose of collective bargaining; and
- Make sure that all employees know the basic terms and conditions of their employment.

Organisation's structure

The Envision Energy group (the “**Group**”) is a world-leading net-zero tech partner providing wind turbines, energy storage, green hydrogen solutions, energy management software and energy technology services in the renewable energy sector. The ultimate parent company of the Group is Envision Energy International Limited (HK). The Group is headquartered in Shanghai with employees globally across the Group’s various regional offices in Asia, Europe, Middle East, Africa, and North and South Americas.

Our business

Our business is organised into several business units, including but not limited to, manufacturing, R&D, development, import, export, supply and service operations. The operations are facilitated by Group companies and employees via a Centre-of-Excellence model, with offices located in Asia, Europe, Middle East, Africa, and North and South Americas.

Each regional office provides specialised services or support functions to the realisation of the Group’s global activities and objectives.

Our supply chains

Our supply chains include, but are not limited to, producers, vendors, sub-contractors, importers & exporters, distributors, warehousing services and transportation & logistic companies.

Envision conducts internal and external third-party audits of our supply chain and supply chain partners and is committed to actioning any recommendations.

Our policies on slavery and human trafficking

Envision Energy emphasizes human rights protection in all operational aspects, adhering to internal and external laws and regulations, and strictly complying with the International Labor Organization Conventions, UN Global Compact and the Universal Declaration of Human Rights.

The Company formulates and updates a series of policies and procedures, including:

- Guidelines for the Prevention of Forced Labor;
- Anti-Discrimination Guidelines;
- Anti-Harassment and Anti-Abuse Guidelines;
- Envision Energy Labour Rights Protection and Social Responsibility Implementation System;
- Envision Energy Supply Chain Sustainability Management;
- Policy Prohibition of the Use of Child Labor and Remediation Guidelines; and
- Youth Employee Protection Guidelines.

These policies and procedures explicitly prohibit human trafficking, forced labor, the use of child labor, violence and harassment, discrimination, and other behaviours. They ensure that employees are not discriminated against based on gender, age, nationality, race, religion, family, or health status. For any human rights violations, the Company has established a complaint mechanism, including its Whistleblower Policy, and takes measures to protect the victims.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. These policies and procedures are consistently enforced (internally and externally) and reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;
- Conduct sanction screening of our supply chain; and
- Protect whistleblowers.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

During the reporting period, the Company conducted a specialized training session on Compliance Risks in Cross-Border Employment Management in the form of open classes for all employees to provide human rights training for local employees, outlining the concepts and principles of combating slavery, forced labor, child labor, discrimination, and harassment in a multinational context.

We also require our business partners to provide training to their staff and suppliers and providers. We conduct periodic audits of compliance training completion records of our staff and business partners.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- Assessing risks in the provision of particular services;
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts;
- Requiring improvements to substandard employment practices; and
- Sanctioning suppliers that fail to improve their performance in line with our requirements.

We publish our Supplier Code of Conduct on our website, which we require all suppliers sign to attest that:

- They don't use any form of forced, compulsory or slave labour;
- Their employees work voluntarily and are entitled to leave work;
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment;
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons; and
- They don't require employees to surrender their passports or work permits as a condition of employment.

Should any supplier fail to adhere to these requirements, a dedicated compliance team, which may consist of involvement from members of the Legal, Human Resource, Audit and Compliance, Procurement & Sales teams, will conduct an independent assessment of the supplier and, if necessary, sanction the supplier from future use by Group companies.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- How many employees have completed mandatory training?
- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?
- What are the findings of our cross-functional team, which reviews how we are addressing modern slavery and human trafficking?

In 2022 & 2023, Envision contracted SGS-CSTC Standards Technical Services Co., Ltd. (hereafter referred to as “**SGS**”), an international audit company founded in 1878 and headquartered in Geneva, to undertake a comprehensive Labour and Working Condition Assessment of Envision and our core suppliers. Envision has implemented all actions to address the issues/gaps for improvement

identified by SGS.

In 2024, Envision contracted Deloitte Consulting (Shanghai) Co., Ltd. (hereafter referred to as “**Deloitte**”), to undertake a Supplier Due Diligence and Assessment Project (the “**Project**”), including onsite audits of Envision and our core suppliers. The Project was developed based on the requirements of Envision's Supplier Code of Conduct, referencing the Responsible Business Alliance's (RBA) Code of Conduct, Organization for Economic Co-operation and Development (OECD) Guidelines for Responsible Supply Chains Due Diligence, the UK Modern Slavery Act, and the requirements of European Union Regulation (EU) 2023/1542 in Product Carbon Footprint Directive and Due Diligence Directive. Envision has implemented corrective action plans (CAPs) to address issues/gaps for improvement identified by Deloitte. These CAPs are managed through our internal system, Lightning – Envision Supplier Audit System. The system sends reminders to suppliers to submit evidence of their corrective actions, and the Envision procurement teams ESG specialist is responsible for reviewing this evidence to ensure compliance and effectiveness.

Continuous development

We believe the effort to stem modern slavery and human trafficking must be a continuous effort at all levels within the Group and with our suppliers.

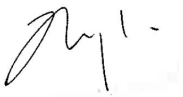
As such, Envision plans to continue its partnership with external consultants such as SGS and Deloitte, to ensure

the compliance of its supply global supply chain. Envision continues to audit its supply chain and we make an unwavering commitment to the improvement of our internal processes and relationships with suppliers to ensure every possible step is taken to combat slavery and human trafficking.

Board, CEO and Executive approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for all Envision Energy group global operations and services for the financial year ending 31 December 2024. It was approved by the board on 14 July 2025.

Signature:



ZHANG Lei

Chief Executive Officer

ENVISION ENERGY INTERNATIONAL LIMITED

Date: 2025.08.22

