

MODERN SLAVERY STATEMENT

Canadian Solar MSS (Australia) Pty Ltd ACN 607 434 300 Financial year ended 31 December 2024

This Modern Slavery Statement ("Statement") is made pursuant to the *Modern Slavery Act 2018 (Cwth)* ("Act") by Canadian Solar MSS (Australia) Pty Ltd (ACN 607 434 300) ("MSS Australia"), a member of the Canadian Solar group of companies ("Canadian Solar").

Canadian Solar is committed to ethical sourcing and maintaining a responsible supply chain. We embed sustainability and ethical practices throughout our entire value chain. To mitigate ESG risks, we have developed supplier screening tools, implemented proactive management programs, and worked directly with suppliers to improve transparency and traceability. Information on our continued efforts and achievements are available from our 2024 Sustainability Report¹ which is available at www.canadiansolar.com.

Canadian Solar does not tolerate forced labor or any form of modern slavery. We are committed to ensuring that modern slavery does not take place anywhere in our businesses, including our supply chain. To achieve this, we have implemented robust anti-forced labor measures, including the development of policies, targeted training, enforcement, and compliance.

This Statement has been prepared with regard to the mandatory criteria of the Act² and covers the period from 1 January 2024 to 31 December 2024 ("Relevant Period").³ Canadian Solar has significantly increased participation in international environmental, social and governance (ESG) initiatives, including in the United Nations Global Compact (UNGC), committing to support and adhere to the Ten Principles of the UNGC on human rights, labour, environment, and anticorruption.

The recognitions and certifications include:

 under the Responsible Business Alliance (RBA) Validated Assessment Program (VAP), a Silver-level recognition at our solar cell factory in Suqian, Jiangsu Province, China awarded in April 2025 for a RBA VAP audit initiated in late 2024;

¹ https://www.canadiansolar.com/wp-content/uploads/2025/05/Canadian-Solar-2024-Sustainability-Report.20250528.pdf

² This Statement addresses each of the 7 mandatory criteria that must be addressed pursuant to the *Modern Slavery Act 2018 (Cth)*: (1) identify the reporting entity; (2) describe the reporting entity's structure, operations and supply chains; (3) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls; (4) describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes; (5) describe how the reporting entity assesses the effectiveness of these actions; (6) describe the process of consultation with any entities the reporting entity owns or controls; and (7) provide any other relevant information.



- RBA VAP Silver-level recognition in 2023 for our solar module factory in Thailand which was valid through 2024;
- Silver Sustainability rating from EcoVadis, one of the world's largest and most trusted providers of business sustainability ratings, headquartered in Paris,
 France, placing Canadian Solar in the top 4% of companies assessed by EcoVadis within the semiconductor industry and top 9% of all assessed companies;
- Prime ESG status from Institutional Shareholder Services (ISS), with our rating upgraded to B+ from B in April 2025, placing us among the top 2% of the companies in the semiconductors industry; and
- expanded our universe of certifications in ISO 9001, ISO 14001, ISO 45001, ISO 50001, covering a range of management systems.

Our structure, operations and supply chains

Structure

MSS Australia is an Australian company with its registered office at its primary place of business at Level 27, 101 Collins Street, Melbourne VIC 3000. MSS Australia had 15 employees in Australia at the end of the Relevant Period, representing marketing, sales, sales operations, logistics, technical support and human resources.

MSS Australia is an indirect subsidiary of CSI Solar Co. Ltd., a publicly listed Chinese company on the Shanghai STAR exchange (SHA: 688472). The ultimate parent company of Canadian Solar is Canadian Solar Inc. (NASDAQ: CSIQ) which was founded in 2001 and is headquartered in Kitchener, Ontario, Canada. MSS Australia did not own or control any other entities during the Relevant Period.

Operations

Canadian Solar is one of the world's largest solar component manufacturers, including solar photovoltaic modules, and provides comprehensive solutions for solar energy and battery storage. It is also a developer of utility-scale solar power and battery storage projects with a geographically diversified pipeline in various stages of development.

Canadian Solar has 2 maintain business segments – CSI Solar and Recurrent Energy. The parent company for the CSI Solar segment is CSI Solar Co. Ltd., the Shanghai listed entity. MSS Australia sits within the CSI Solar segment and its primary activities during the Relevant Period was the importation, distribution and sale of "Canadian Solar" solar photovoltaic modules, inverters, and related products in Australia and New Zealand.



- CSI Solar consists of solar module and battery energy storage manufacturing, and delivery of total system solutions, including inverters, solar system kits, and EPC (engineering, procurement, and construction) services. It includes CSI Solar's e-STORAGE business which provides integrated utility-scale battery energy storage solutions, including turnkey and bankable system solutions across various applications, long-term service agreements, and future battery capacity augmentation services.
- Recurrent Energy is one of the world's largest clean energy project
 development platforms with 15 years of experience, having delivered
 approximately 11.6 GWp of solar power projects and 4.5 GWh of battery energy
 storage projects. It is vertically integrated and has strong expertise in greenfield
 origination, development, financing, construction, execution, operations and
 maintenance, and asset management.

The CSI Solar business accounts for the majority of the group's net revenue. CSI Solar currently has customers in more than 150 countries, across the residential, commercial and utility segments.



Supply Chains

MSS Australia does not own or operate any production or manufacturing facilities and purchases all photovoltaic modules for sale directly from other members of Canadian Solar. MSS Australia also purchases goods and services needed to operate its business in Australia and New Zealand, including third party logistics services for warehousing and inventory management and transportation of goods and customs and ports services as needed for importation of goods for sale in Australia.

At group level, Canadian Solar's key supply chains relate to the procurement of cells, wafers, ingots and polysilicon for the manufacture of PV modules. The majority of our



PV modules and other products are produced in our manufacturing affiliates in China, although in the Relevant Period, Canadian Solar also had manufacturing entities in Canada, Vietnam, Thailand and since 2024, the USA. Further information, including the names and locations of manufacturing subsidiaries, are set out in Canadian Solar Inc's Annual Report⁴.

In relation to polysilicon, where this is purchased directly by the Canadian Solar group, it is currently purchased from suppliers incorporated in various provinces in China, Malaysia and in Germany.

At group level, in addition to the key supply chain above, there are also external manufacturing supply chains in relation to other raw materials and components, including glass, steel, silver for PV modules, lithium iron phosphate (LFP) battery cells for our battery energy storage products, and packaging materials and related services.

Our strategy is to establish sustainable, efficient and ethical supply chains that meet the development needs of our group and the interests of all our stakeholders, including workers involved at all stages in the manufacturing process.

Modern Slavery Risks

As at 31 December 2024, MSS Australia had 15 employees, who were all based in Australia and who were either involved in marketing, distribution and sales and sales operations or corporate and technical support services, in Australia and New Zealand. The geographical location, type of business conducted and small number of employees present a very low risk of modern slavery within the business.

MSS Australia's primary risks arise from modern slavery in Canadian Solar's supply chain. The risks of occurrence within the Canadian Solar group of companies and facilities under its direct control is considered low in view of the strong corporate policies and clear stance against any modern slavery or human rights abuses.

For non- Canadian Solar related entities, there is again a low risk for those direct and indirect suppliers providing goods and services in countries like Australia and New Zealand, given the strong rule of law and the nature of the third-party logistics and freight handling businesses involved. The risk is greater for but generally still capable of being mitigated for direct suppliers or contactors through the enforcement of Canadian Solar's Supplier Code of Conduct.

However, MSS Australia faces potential risks of modern slavery or forced labour and child labour exploitation in relation to indirect suppliers and vendors that make up Canadian Solar's extended supply chain network beyond its direct suppliers and contractors, especially where those parties are in higher risk geographic locations or conflict minerals are involved.

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⁴ https://investors.canadiansolar.com/financial-reports



Risk Assessment

Canadian Solar extends our anti-modern slavery initiatives to include our supply chain. Before engaging with new manufacturing suppliers, our central procurement team conducts a comprehensive modern slavery risk assessment. We also require our suppliers to provide contractual assurances confirming that they are not involved in any form of modern slavery, which requires them to investigate their own supply chains to ensure their suppliers do not engage in modern slavery.

ACTIONS TAKEN TO ADDRESS MODERN SLAVERY

Policies

Canadian Solar's policies reflect our firm stance against exploitation and provide clear guidelines for employees, suppliers, and partners. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to prevent modern slavery in any part of our business and supply chains. This includes closely examining our supply chains to ensure goods imported are not mined, produced or manufactured, wholly or in part, with prohibited forms of labour, such as slave, convict, indentured, forced or indentured child labour.

The following policies and procedures were in place in relation to Modern Slavery for the Relevant Period:

- Canadian Solar's **Modern Slavery Policy**⁵ and associated procedures. This Policy describes modern slavery as a "crime", commits "to complying with anti-slavery laws and regulations in every jurisdiction in which it conducts business" and "ensuring that modern slavery does not take place anywhere in its business, including through its supply chain" and clearly states that "Canadian Solar will not tolerate any parties directly or indirectly engaging in modern slavery".
- Canadian Solar's **Supplier Code of Conduct**⁶, which is required to be signed and adhered to by all group suppliers. This Code goes beyond the basic requirement of prohibiting modern slavery, extending to broader issues such as human rights, environmental protection, health, safety, and business ethics. Our Code, primarily derived from the Responsible Business Alliance (RBA) Code of Conduct, serves as an integral part of our due diligence process for assessing new suppliers, who are required to adhere to it. Furthermore, we require our suppliers to ensure that their own suppliers operate in compliance with the Code. In this way, we ensure that not only our direct suppliers but also our indirect suppliers -that is, our suppliers' suppliers uphold the obligations set forth in the Code.

⁵ http://investors.canadiansolar.com/static-files/9933a290-df48-45ef-9738-c31154bf96d8

⁶ https://investors.canadiansolar.com/static-files/ae1534e7-8b4a-4dce-833d-b7a12c5041bb



• We incorporate **modern slavery clauses** and covenants in our supply contracts, requiring suppliers to comply with applicable modern slavery laws, implement appropriate controls and notify Canadian Solar immediately if they become aware of any modern slavery actions within their supply chains.

In addition, we had the following established group-wide policies and procedures in place which underpin our core values in this area:

- Code of Business Conduct and Ethics⁷
- Anti-Bribery and Anti-Corruption Policy⁸ (Prohibition against giving bribes)
- Whistleblower Policy⁹
- Conflict Minerals Policy¹⁰
- Labor and Human Rights Policy¹¹

Due Diligence and Remediation

Our procurement management strategy is built on a centralized framework, overseen at the group level and executed through individual divisions. We integrate ESG criteria into our supply chain management to ensure alignment with our commitment to sustainability and responsible business conduct by developing robust supplier screening tools, practice management programs, and working directly with suppliers to improve transparency and traceability.

As noted in our 2024 Sustainability Report, ¹² HR directors or managers of our global manufacturing entities are required to sign a "Statement of Anti-Modern Slavery Risk Management" on an annual basis. This includes explicitly affirming that their respective factories are not involved in any activities associated with forced labor. This statement has been developed based on key internationally recognized principles and guidance, including the Ten Principles of the UN Global Compact (UNGC) and the International Labor Office Indicators of Forced Labor, from which the UNGC Principles are partially derived.

To uphold our high standards for quality, cost, and ESG performance, we have a suite of supply chain-related policies and conduct comprehensive supplier screenings. In addition, our supplier auditing program further strengthens our efforts, ensuring an efficient and sustainable supply chain that aligns with the company's strategic goals and safeguards stakeholder interests.

In the Relevant Period, Canadian Solar has noted a marked increase in requests from customers for transparency across key supply chains, together with related third-party audit rights. We have worked closely with customers to understand their specific

⁷ https://investors.canadiansolar.com/static-files/88af24b8-0eea-4291-b984-d1b401be2ca2

⁸ https://investors.canadiansolar.com/static-files/417277b8-370e-4cd6-b8be-68254617d9f7

⁹ https://investors.canadiansolar.com/static-files/6c23cd29-a9d7-4946-a657-6791b69b93c0

¹⁰ https://investors.canadiansolar.com/static-files/32eba6e4-b40d-4b4c-be76-c979ab487b75

¹¹ https://investors.canadiansolar.com/static-files/20aa7ed9-5f17-4362-89e6-7d46a4d72387

¹² Page 60 2024 Sustainability Report



requests and used these as opportunities to continue to build on our experience across different regions including the USA and EU. Significant progress has been made through these efforts along with an increased understanding of our employees of what modern slavery and traceability entails and why it is important.

CSI Solar collaborates with third-party suppliers to ensure a responsible, reliable, and sustainable supply of all raw materials and components. These include solar silicon, ingots, wafers, cells, PV glass, aluminum, silver metallization paste, back sheets, and ethylene vinyl acetate encapsulants (EVA) for solar modules. To strengthen supply chain control and cost efficiency, we have increased the level of integration of our inhouse solar manufacturing capacity structure. Going forward, Canadian Solar is pursuing a dual strategy to diversify its external suppliers and also to build its in-house manufacturing capabilities.

Supplier ESG Audits

Canadian Solar maintains a rigorous ESG auditing program which covers key areas including human rights and forced labour. Information on this program is available at page 61 of our 2024 Sustainability Report.

In 2024, we conducted a total of 147 supplier ESG audits, including 31 on-site audits—an increase from 129 total audits and 29 on-site audits in 2023. The major findings primarily involved environmental issues, with no cases of forced or child labor identified. Of the 147 suppliers audited, approximately 82% achieved ISO 14001 environmental management system certification, and 73% achieved ISO 45001 occupational health and safety management certification. To improve our suppliers' environmental practices, we partner with them by providing training and support on best practices and collaboratively developing public time-bound action plans. Following consultation and the implementation of corrective action plans, all suppliers successfully passed our 2024 ESG audits.

Additionally, beyond our own audits, two of our polysilicon suppliers in Qinghai Province, China have initiated the RBA VAP audits at our request - audits are expected to be completed in the second half of 2025.

Training and Awareness

Training and awareness are key controls in addressing the risk of modern slavery. Canadian Solar recognises the need to build the capability of our employees at all levels (particularly our procurement practitioners and front-line staff) to identify potential red flags of modern slavery and the actions required to respond appropriately.

Canadian Solar has established cross-functional teams, comprising compliance, HR, legal, procurement, supplier quality engineering and ESG professionals, to develop and



implement anti-modern slavery policies and procedures. These teams are responsible for delivering training programs and conducting due diligence to ensure the effectiveness of our anti-modern slavery policies and initiatives. Through consistent reinforcement of awareness, Canadian Solar fosters a culture of accountability and vigilance.

Mandatory training is provided on anti-modern slavery requirements both as part of employee on-boarding and through annual training sessions. The sessions include content to heighten employee awareness of anti-modern slavery initiatives. All attendances are monitored and recorded.

Assessing the effectiveness of actions being taken

The effectiveness of Canadian Solar's manufacturing sites have undergone multiple third-party ESG audits. In addition to the self-initiated RBA VAP audits conducted at our Thailand and Suqian factories in 2023 and 2024, respectively, many of our factories have successfully completed and passed external third-party ESG audits requested by our customers.

These audits involved a detailed review of our environmental, health and safety practices as well as our labor practices, and were conducted by leading independent international audit firms such as Achilles, BSI, Kiwa, STS, and TÜV Rheinland. Moreover, we have worked closely with our customers and their advisors to develop and deliver human rights training to the relevant Canadian Solar business areas.

Continuous Improvement

Canadian Solar acknowledges that it will continue to face modern slavery risks and its efforts to mitigate these risks will change over time.

In order to assess the effectiveness of its measures, the Responsible Business Alliance have been engaged to conduct a Validated Assessment Program. This programme is the leading standard for onsite compliance verification conducted by RBA-accredited independent, third-party firms. This on-site audit includes the areas of labour practices (including ensuring there is no forced labour).

In 2023, Canadian Solar's factory in Thailand was audited by TÜV Rheinland and earned a Silver-level recognition for the VAP audit, fully in compliance with "Freely Chosen Employment" rules, in other words, no presence of forced labour.

In 2024, Canadian Solar moved forward with plans to conduct further RBA VAP third-party audits at both our factory and in the supply chain. The RBA VAP audit conducted in late 2024 of our Suqian solar cell factory also returned a Silver-level recognition in April 2025. This confirmed our full compliance with the Freely Chosen Employment standards, demonstrating that there is no presence of forced labor.



Process of consultation with owned or controlled entities

This criterion of the Act is not applicable as MSS Australia does not own or control any other entities.

Other relevant information

Participation in Industry Modern Slavery Working Group

MSS Australia participated in the Clean Energy Council's Modern Slavery working group and contributed to the dialogue for development of a voluntary reporting code for the renewables sector. This included regular meetings, both online and in person, with experts in the field, customers, industry colleagues and the NSW Anti-Slavery Commissioner. Through these engagements, we leverage collective resources and gain knowledge to drive impactful change.

Reporting and Transparency

In 2021, MSS Australia filed a joint modern slavery statement with other Australian affiliates. CSI Solar commenced operating as a separate business segment in 2021 and has filed modern slavery statements in the United Kingdom since that time, including on behalf of MSS Australia on a voluntary basis.

This Statement will be submitted for publication on the Modern Slavery Statement Registry and will also be available on Canadian Solar's website.

In the Relevant Period, our ultimate parent company, Canadian Solar Inc., also filed a report pursuant to *Fighting Against Forced Labour and Child Labour in Supply Chains Act,* S.C. 2023, c.9 (Canada)¹³.

Whistleblower Policy

Any party, including personnel, vendors, suppliers, partners, and others with whom we conduct business, can make enquiries or report concerns through a variety of channels, including through the contact details below and any other reporting channels referred to in our Whistleblower Policy¹⁴.

Whistleblower hotline

by phone +1 519 823 7451

by e-mail Whistle-blower@csisolar.com

Such notifications will be managed in accordance with Canadian Solar's Whistleblower Policy (see above), which is available online at www.canadiansolar.com.

¹³ https://www.canadiansolar.com/wp-content/uploads/2024/07/2023-Supply-Chain-Report.pdf

¹⁴ https://investors.canadiansolar.com/static-files/6c23cd29-a9d7-4946-a657-6791b69b93c0



Approval and Review

This Modern Slavery Statement was unanimously approved by MSS Australia's Board of Directors by board resolution dated Monday, 30 June 2025. Any one of the directors was authorised to sign the statement for submission as required under the Act.

Darren Charles Hoffman

Managing Director, Australia and New Zealand

30 June 2025