



Modern Slavery Statement

Goldwind Australia Pty Ltd

Goldwind Tasmania Constructions Pty Ltd

Introductory statement

This Modern Slavery Statement sets out the actions taken by Goldwind Australia Pty Ltd and Goldwind Tasmania Constructions Pty Ltd to build their understanding of and mitigate modern slavery risks throughout their operations and supply chains.

We are committed to continuously improving our practices to combat modern slavery and to ensure that slavery in any form does not exist in our supply chain.

We have prepared this Modern Slavery Statement in line with the requirements of *the Australian Modern Slavery Act 2018 (Cth)* (the **Act**) and we will review, update and submit this Modern Slavery Statement annually in accordance with our obligations under the Act.

Mandatory Reporting Criteria 1 and 2: Identify the reporting entities and describe the reporting entities' structure, operations and supply chains

Reporting Entities

This document is a Joint Modern Slavery Statement pursuant to section 14 of the Act for the following mandatory reporting entities:

1. Goldwind Australia Pty Ltd ACN 140 108 390
2. Goldwind Tasmania Constructions Pty Ltd ACN 626 152 752

(the **Reporting Entities**).

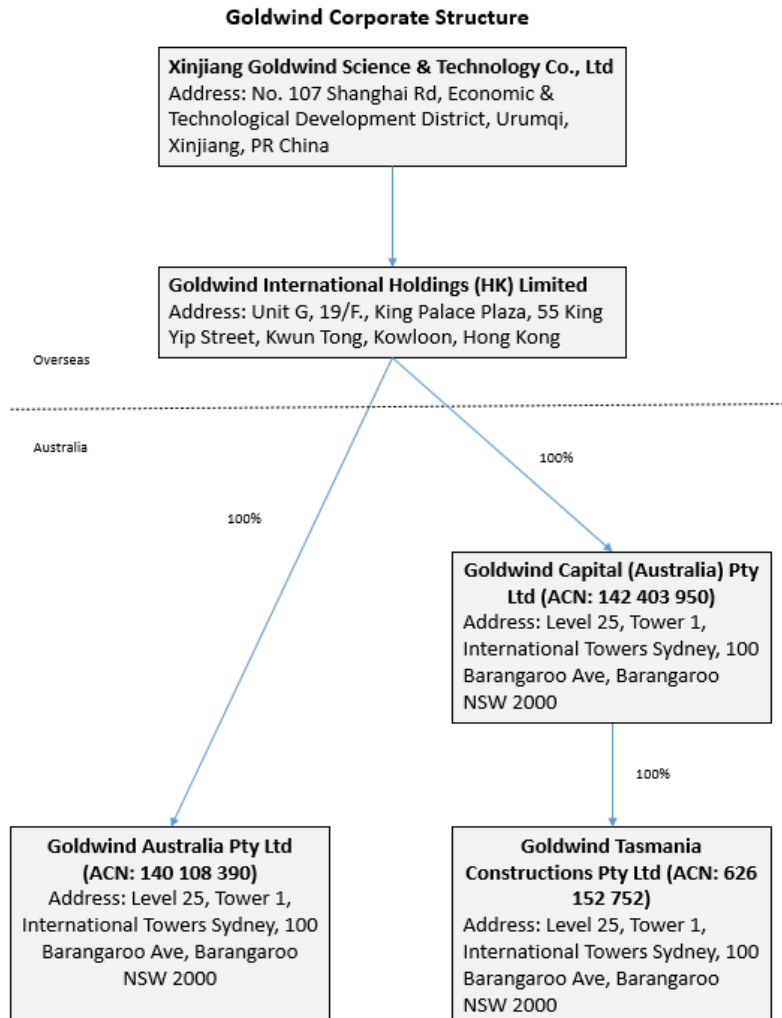
The Reporting Entities are Australian proprietary limited companies incorporated under the Corporations Act 2001 (Cth) and registered with ASIC.

Reporting Entities - Company Structure

The Reporting Entities are wholly owned subsidiaries of Goldwind International Holdings (HK) Limited, a company incorporate in Hong Kong, which is itself a wholly owned subsidiary of Xinjiang Goldwind Science & Technology Co., Ltd, a publicly listed company on the Shenzhen and Hong Kong Stock Exchanges.

The Reporting Entities do not own or control any other companies or corporate entities.

Figure 1 below shows the corporate structure chart for the Reporting Entities together with the registered address for each entity:



The Reporting Entities' ultimate parent company, Xinjiang Goldwind Science & Technology Co., Ltd. (**Goldwind Science & Technology**) is an independent company, publicly listed on two stock exchanges - the Shenzhen Stock Exchange (SZSE: 002202) and the Stock Exchange of Hong Kong Limited (HK: 2208) with shareholding distributed across approximately 150,000 shareholders (as at 31 December 2020).

The diverse breadth of shareholders (as at 31 December 2020) is made up of a variety of investors including a Chinese State-owned Power Entity, a British multinational asset management company, three American multinational investment banks and financial services companies, an American multinational investment management corporation, international private companies, and individual investors. There is no controlling shareholder of Goldwind Science & Technology.

Goldwind Science & Technology is one of the world's largest manufacturers of wind turbines and is one of China's most innovative companies. Goldwind Science & Technology has more than 73 gigawatts of installed capacity across six continents and 27 countries.

For more detail about Goldwind Science & Technology including its growth strategy, corporate sustainability and human rights commitment, please go to its website using the link below and access its Annual and Half-Year Reports: www.goldwindglobal.com.

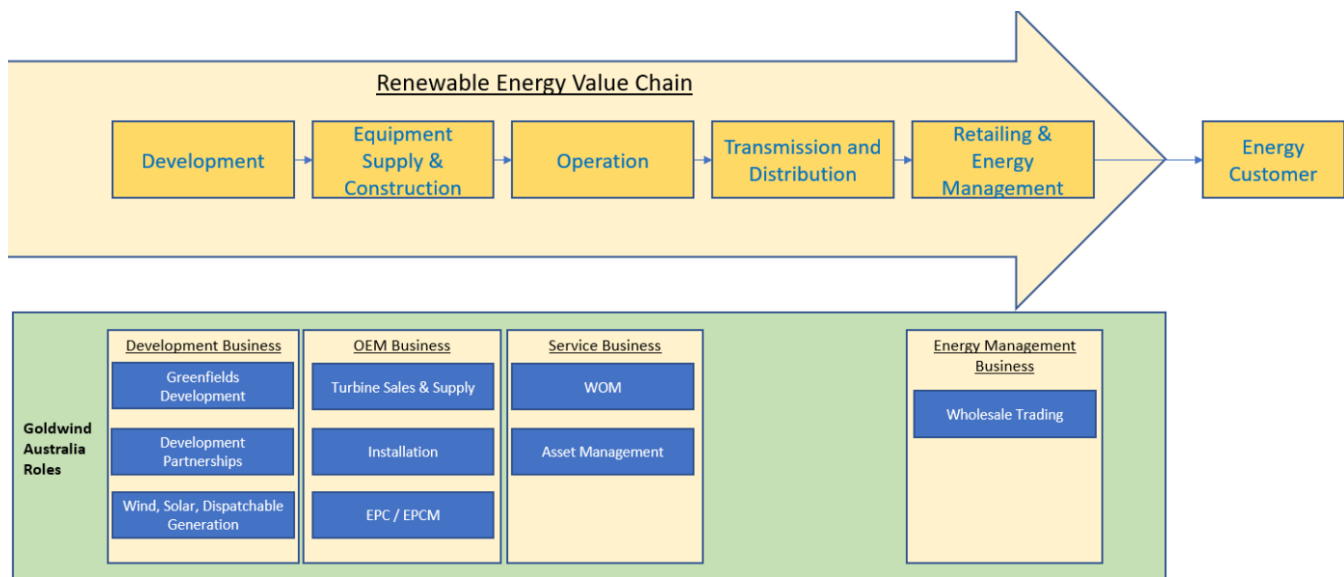
Goldwind Science & Technology investor and stock exchange documents and information can be found at: www.goldwindglobal.com/invest.

Reporting Entities - Operational Structure

The Reporting Entities carry out the following types of business within the Renewable Energy Sector in Australia:

1. **Development Business** – the investment in and acquisition and development of renewable energy projects (including wind and solar farms);
2. **OEM (Original Equipment Manufacturer) Business** – the sale and supply of wind turbine components and the construction and installation of renewable energy projects (including wind and solar farms);
3. **Services Business** – the servicing, maintenance and asset management of renewable energy projects (including wind and solar farms); and
4. **Energy Management Business** – the management of wholesale trading relating to renewable energy projects (including wind and solar farms).

Figure 2 below shows the Renewable Energy Sector Value Chain and how each of the Reporting Entities' businesses fit within the value chain.



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

- Investment
- Sales & Marketing
- Program Delivery
- Service
- Grid & Scada
- Corporate Services (comprising HR, I.T. Communications, Legal and HSEQ (Health, Safety, Environment & Quality))

As at 31 December 2020, Goldwind Australia Pty Ltd directly employed 231 employees in Australia. Goldwind Tasmania Constructions Pty Ltd does not employ any employees.

The Reporting Entities operate from two offices in Sydney and Melbourne and a number of project sites across Australia within the following States:

- New South Wales
- Victoria
- Tasmania
- Queensland
- Western Australia

Goldwind Tasmania Constructions Pty Ltd is the main contracting entity for projects located in Tasmania. Goldwind Australia Pty Ltd is the main contracting entity for all other projects in Australia outside of Tasmania. During the reporting period, projects were in various phases including 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.

Reporting Entities - Supply Chains

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

1. **Procurement of goods** – including wind turbine components (e.g. generators, hubs, nacelles, blades, towers, etc.) and other major electrical plant and equipment required to construct renewable energy projects (e.g. powerlines, substations, synchronous condensers, etc.), personal protective equipment and clothing, I.T. hardware and office stationery;
2. **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 accommodation from long term residential rental properties to overnight accommodation in local hotels;
3. **Asset management services** – engineers and technicians performing onsite servicing and maintenance work for renewable energy projects;
4. **Professional consultancy services** – including engineering, environmental, planning, legal, accountancy, 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;
5. **Outsourced services** – including for I.T. technical support and staff payroll; and
6. **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 their parent company in China and 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 vicinity of their project sites wherever possible (e.g. for civil and electrical construction work, metmast installation, offsite 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 their projects. In addition, the Reporting Entities aim to employ locals to operate and maintain their projects post-construction over their lifetime. The Reporting Entities also often engage closely with key subcontractors to ensure local employment is encouraged.

Mandatory Reporting Criteria 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entities

We have not identified any current risks that the Reporting Entities' operations have caused or contributed to modern slavery practices or that the Reporting Entities' operations, products or services are indirectly linked to modern slavery practices through the activities of other entities with which they have a business relationship (including entities with which they do not have a direct contractual relationship).

However, we have conducted a thorough risk assessment (as required by the Act) and identified general risk areas for the Reporting Entities based on the nature and circumstances of the sectors and industries, products and services and geographic regions associated with their supply chains; this is set out below .

In assessing these risks, we refer to the Australian Government's '*Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities*' (the **Guidance**) and specifically the reference materials set out in Appendix 5 of the Guidance.

Sector and industry risks

The operations and supply chains of the Reporting Entities are involved in the following sectors and industries which may be at risk of modern slavery:

- **Manufacturing:** The Reporting Entities procure wind turbine components which are manufactured in factories. The manufacturing sector is identified in the '*Walk Free Foundation's Global Slavery Index 2018*' (as referred to in Appendix 5 of the Guidance) as a high-risk industry for modern slavery.
- **Construction:** The Reporting Entities are involved in the construction of renewable energy projects in Australia. The construction sector is identified in the '*Walk Free Foundation's Global Slavery Index 2018*' (as referred to in Appendix 5 of the Guidance) as a high-risk industry for modern slavery.

Product and services risks

The operations and supply chains of the Reporting Entities are involved with the following products and services which may be at risk of modern slavery:

- **Electronic goods:** The Reporting Entities are involved in the purchasing of electronic goods for general business use such as laptops and mobile phones for employees. Electronic goods are identified in '*the US Department of Labour List of Goods Produced by Child or Forced Labour*' (as referred to in Appendix 5 of the Guidance) as goods that may involve a high risk of modern slavery.
- **Personal Protective Equipment (PPE):** The Reporting Entities are involved in the purchasing of personal protective equipment (including clothing) for use by their employees and subcontractors at the project sites. Clothing is identified in the '*Walk Free Foundation's Global Slavery Index 2018*' (as referred to in Appendix 5 of the Guidance) as a product at risk of modern slavery.
- **Cleaning services:** The Reporting Entities procure cleaning services at both their offices and project sites across Australia. The cleaning sector is identified in the '*Walk Free Foundation's Global Slavery Index 2018*' (as referred to in Appendix 5 of the Guidance) as a high-risk industry

for modern slavery.

- **Labour-hire services:** The Reporting Entities utilise third party recruitment firms to engage contingent labour and the Reporting Entities also engage with third parties for the provision of services who may subcontract-out aspects of the service delivery to other organisations. In these cases, the Reporting Entities have comparatively less visibility over practices employed through these contracting arrangements. Labour-hire in the construction industry is identified in the '*Walk Free Foundation's Global Slavery Index 2018*' (as referred to in Appendix 5 of the Guidance) as a high-risk area for modern slavery.

Geographic risks

The operations and supply chains of the Reporting Entities are involved in the following regions which may be at risk of modern slavery:

- **Asia:** As described above, the Reporting Entities procure the majority of the major wind turbine components from their parent company based in China. The Asia and the Pacific region is identified in the '*Walk Free Foundation's Global Slavery Index 2018*' (as referred to in Appendix 5 of the Guidance) as a region with a high-risk for modern slavery.

Entity risks

The operations and supply chains of the Reporting Entities do not include any globally recognised high modern slavery risk entities.

Mandatory Reporting Criteria 4: Describe the actions taken by the reporting entities to assess and address these risks, including due diligence and remediation processes

The Reporting Entities have taken the following actions in the reporting period to assess and address the risks of modern slavery identified above:

- **Appropriate compliance and governance set up:** The Reporting Entities have systems and controls in place to support and monitor their compliance with all major Australian laws and regulations that apply, including the Act. The Reporting Entities have assigned responsibility to the Corporate Services Department to assist the companies by monitoring, tracking progress and providing advice in relation to the various compliance activities occurring. These systems are continuing to be developed to improve their efficiency and effectiveness.
- **Supply chain due diligence undertaken:** We conducted a supply chain due diligence exercise to better understand the number and nature of the Reporting Entities' suppliers and contractors during the reporting period as follows:
 - In order to identify the Australian suppliers and contractors of the Reporting Entities, we used our invoicing and payment system to obtain historical data on any suppliers and contractors paid by the Reporting Entities during the reporting period. In addition, we obtained further data from our online contractor management system (see below for more details). We also sent questionnaires internally to managers and employees who were involved in the procurement of major suppliers and contractors for the Reporting Entities during the reporting period and reviewed their responses to obtain information on the current systems and processes in place for the Reporting Entities.
 - In order to obtain information on the supply chain and current systems and processes in place by the Reporting Entities' parent company based in China, we sent questionnaires to key contacts within its legal department and supply chain department and reviewed their responses.
- **Prequalification and screening of suppliers and contractors through an online contractor management system:** The Reporting Entities utilise a third-party online contractor management solution to assist with the risk management and compliance prequalification and verification of the majority of their suppliers and contractors. This system allows the Reporting Entities to procure declarations, conduct surveys or audits, review documentation and request specific policies and procedures from their suppliers and contractors. The system has been in place for the entire reporting period, however, the system was updated in September 2020 to include a specific built-in tool that assists with the collection of ethical sourcing and modern slavery information from suppliers and contractors. This involves each supplier/contractor being required to provide responses to a separate ethical sourcing and modern slavery questionnaire as part of the existing annual pre-qualification process. The Reporting Entities then have visibility of all supplier/contractor responses together with any potential risk issues automatically flagged by the online system based on these responses. For any high-risk suppliers/contractors, the Reporting Entities can require them to undergo a full modern slavery risk review on the system involving more detailed investigations of their governance, policies, procedures, financial arrangements, employment contracts, working conditions, etc. We will continue to review and monitor these responses and require suppliers and contractors to undertake the full modern slavery risk review as appropriate.

- **Implementation of relevant policies & employee training:** The Reporting Entities have the following policies in place which relate to employee conduct, working conditions, complaints, compliance, risk management and procurement:
 - Code of Conduct Policy
 - Complaints and Enquiries Policy
 - Compliance Obligations Policy
 - Harassment and Bullying Policy
 - Equal Employment Opportunity Policy
 - Fatigue Management Policy
 - Grievance Policy
 - Procurement Directive
 - Recruitment Policy
 - Risk Management Policy
 - Supplier Prequalification Directive
 - Whistleblower Policy
 - Work Health & Safety Policy including Health & Safety 'Golden Rules'

The Reporting Entities require all employees to review the above policies and undertake specific online training modules for the major policies at on-boarding and periodically thereafter. We are currently considering the implementation of a standalone Modern Slavery Policy and/or a Supplier/Contractor Code of Conduct together with mandatory training for both for all employees/suppliers/contractors.

- **Ensuring labour standards met:** all employees of the Reporting Entities are at a minimum covered by the National Employment Standards, the Electrical Power Industry Award or an Enterprise Bargaining Agreement and the majority of these employees are engaged on common law contracts and receive labour standards above and beyond the minimum statutory requirements. The human resources and finance departments of the Reporting Entities ensure that all required labour standards are met for employees.
- **Imposing legal obligations on suppliers/contractors to comply with the Act in new contracts:** The Reporting Entities have started to include specific clauses in new legal contracts with major suppliers and contractors to require them to comply at all times with the Act and provide reasonable evidence if requested. We will continue to insert these clauses into the remainder of our template legal contracts for use with other more minor suppliers and contractors during 2021.
- **Improved grievance mechanism:** The Reporting Entities have several policies and systems in place to allow an employee, supplier or contractor to raise any concerns regarding modern slavery within the Reporting Entities' operations and supply chains including via the Whistleblower Policy which is available to employees, suppliers and contractors via the Goldwind Australia website and provides for named disclosures and anonymous disclosures by such persons.
- **Increased senior leadership awareness:** Briefings have been held with the senior management team of the Reporting Entities to explain the background, purpose and requirements of the Act.
- **Launched Goldwind Values:** The Reporting Entities launched a campaign to all employees during the reporting period setting out the company's values of:
 - Respect & Trust;
 - Openness & Collaboration;
 - Customer-orientation;
 - Unity of Knowing and Acting; and
 - Pioneering Mindset.

The values were also embedded into the Reporting Entities' recruitment and onboarding processes involved in the hiring of all new employees. We are currently running a further campaign with all employees to set out the signature behaviours associated with each of these values.

- **Remediation:** We have not identified any current risks that the Reporting Entities' operations may cause or contribute to modern slavery practices. We will continue to seek to avoid causing or contributing to modern slavery across the operations and supply chains of the Reporting Entities. We encourage all employees, suppliers, contractors, business partners, communities and customers to report and express any concerns relating to such activities and suspected violations of these policies, including via the mechanisms described in the Whistleblower Policy. If a grievance is raised, we will assess the information reported and determine an appropriate course of action. We are committed to investigating, addressing and responding to any modern slavery concerns and taking the appropriate corrective actions if required.

Mandatory Reporting Criteria 5 – Describe how the reporting entities assess the effectiveness of actions being taken to assess and address modern slavery risks

The Reporting Entities will assess the effectiveness of the actions taken to assess and address modern slavery risks as follows:

- **Annual review by senior management:** each year, the senior management team of the Reporting Entities will undertake a review of the current and proposed actions seeking to assess and address modern slavery risks;
- **Annual review of supplier/contractor responses:** at least once per year, the responses provided by the suppliers and contractors of the Reporting Entities through our online contractor management system will be thoroughly reviewed and a determination made as to whether any suppliers or contractors require a full modern slavery risk review;
- **Audit of supplier/contractor actions:** where a supplier/contractor has agreed to undertake mitigation measures, we will undertake a periodic audit to determine if such measures have been consistently actioned;
- **Policy review:** all policies and procedures of the Reporting Entities (including those described above) are subject to a periodic review and update by the policy/procedure owner with any changes requiring endorsement by the Head of Legal and the Managing Director;
- **Training review:** we are working on a new training compliance reporting system to allow a periodic audit of all employee training records to ensure mandatory training for the major policies described above have been completed by all employees;
- **KPI:** we are considering incorporating a new KPI into the Corporate Services Department to ensure timely compliance with the Reporting Entities' obligations under the Act and to ensure initiatives to assess/address modern slavery risks are implemented effectively;
- **Modern Slavery Internal Working Group:** we are considering forming a cross-functional internal working group comprising of representatives from procurement, legal, human resources, health & safety, operations and communications to regularly engage, review and provide feedback on the current and proposed actions seeking to assess and address modern slavery risks; and
- **Modern Slavery External Working Group:** we are considering having a representative from the Reporting Entities to join and actively participate in the Clean Energy Council Modern Slavery Working Group to understand best industry practice.

Mandatory Reporting Criteria 6 – Describe the process of consultation with any entities the reporting entities own or control

The Reporting Entities do not own or control any other entities.

A joint statement has been provided for both Goldwind Australia Pty Ltd and Goldwind Tasmania Constructions Pty Ltd as both entities use the same policies and processes, operate in the same sector and have many shared suppliers and contractors so it seems appropriate to provide a single, consolidated description of their actions to assess and address modern slavery risks.

Regarding consultation, both Goldwind Australia Pty Ltd and Goldwind Tasmania Constructions Pty Ltd are managed by the same senior management team who were made aware of and approved the contents of this statement.

Board of director approval from both Goldwind Australia Pty Ltd and Goldwind Tasmania Constructions Pty Ltd was obtained for this statement in accordance with the requirement under the Act on 25-June-2021.

Mandatory Reporting Criteria 7 – Provide any other relevant information

The ultimate parent company of the Reporting Entities has recently issued:

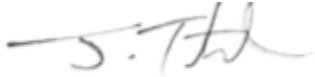
- a public commitment to human rights and the ethical manufacturing and supply of clean energy products and solutions; a copy of this letter can be found on their website using this link: [Commitment to Human Rights Statement](#)
- its 2020 Sustainability Report; a copy of this report can be found on their website using this link: [2020 Sustainability Report](#)

For more information on Goldwind Science & Technology's Corporate and Social Responsibility, please visit: <http://www.goldwindglobal.com/about/csr>.

Signing page

This statement is signed by the Managing Director of Goldwind Australia Pty Ltd and Goldwind Tasmania Constructions Pty Ltd for the reporting period 1 January 2020 to 31 December 2020.

Signature:

A handwritten signature in black ink, appearing to read "S. Titchen".

John Titchen

Managing Director

Goldwind Australia Pty Ltd

Goldwind Tasmania Constructions Pty Ltd

Effective Date: 28-June-2021