



Trina Solar (Australia) Pty Ltd

# 2025 Modern Slavery Statement

[www.trinasolar.com/au](http://www.trinasolar.com/au)

# Introduction

Trina Solar (Australia) Pty Ltd (ACN 150 695 524) (hereinafter referred to as “Trinasolar Australia”) is a subsidiary of Trina Solar Co., Ltd., a publicly listed Chinese company founded in 1997 (stock code: 688599.SH).

Together with their global affiliates, these entities will be collectively referred to herein as “**Trinasolar**” or “**Trinasolar Group**”.

Trinasolar is dedicated to upholding human and labour rights and is committed to the global eradication of modern slavery in all its forms.

For the financial year ending on 31 December 2025, Trinasolar Australia reported revenues exceeding one hundred million Australian dollars, surpassing the threshold established by the Modern Slavery Act 2018 (Cth) (hereinafter referred to as the “**Act**”) and, as such, is classified as a reporting entity pursuant to the Act.

This statement outlines the areas of risk identified by Trinasolar, the initiatives undertaken to

mitigate these risks, and the measures employed to assess the effectiveness of these efforts in eliminating the risks of modern slavery within its operations and supply chain.

Trinasolar actively collaborates with its suppliers and stakeholders to increase awareness of modern slavery issues. The company is committed to effectively communicating its expectations and, when necessary, taking decisive action to address and mitigate effectively any risks associated with modern slavery.

**According to the Act, “modern slavery” encompasses the following categories:**

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



# About Trina Solar (Australia) Pty Ltd

**Trinasolar Australia is the Australian arm of Trinasolar Group, whose parent company, Trina Solar Co., Ltd. has its headquarters in Changzhou City, Jiangsu Province, China. Trinasolar Group is a world leading photovoltaic (“PV”) and smart energy total solutions provider.**

Trinasolar Group is mainly engaged in the following sectors:

- **PV Products:** Conducting research and development, production and sales of PV modules;
- **Battery Energy Storage:** Delivering diversified energy storage solutions, encompassing large-scale ground-mounted power stations, commercial and industrial energy storage, and residential energy storage;
- **System Solutions:** Providing solar mounting system business, distributed system business, centralised power plant business, and other related businesses; and
- **Digital Energy Service:** Offering new energy operations and maintenance services, new energy power generation business, and other related businesses.

Trinasolar Group is committed to pioneering smart solar energy solutions aimed at achieving a net-zero future. Through constant innovation,

Trinasolar Group continues to push the PV industry forward by creating greater grid parity of PV power and promoting the adoption of renewable energy. Trinasolar Group is consistently recognised as a top-tier PV module manufacturer globally. In addition, Trinasolar Group’s downstream business includes solar PV project development, financing, design, construction, operations, management and comprehensive system integration solutions for customers.

Trinasolar Australia employs fourteen (14) full-time employees ranging from sales personnel and solar engineers to finance experts and support staff. On a global scale, Trinasolar Group has nearly twenty-five thousand (25,000) employees. Trinasolar Group’s module shipments rank in the top four within the industry. In 2025, Trinasolar Group shipped over 67GW in PV modules and has successfully shipped more than 8GWh in battery energy storage products across China, Europe, the Middle East, Asia Pacific and North America, showcasing its global reach and impact.

Trinasolar Group has established regional headquarters in Zurich (Switzerland), Silicon Valley and Miami (USA), Singapore, and Dubai (UAE), offices or branches in Madrid, Mexico, Sydney, Rome, etc., as well as manufacturing bases in Indonesia and the UAE, exploring a new model for glocalisation and promoting localisation operation for the American cooperative base.

To date, it has operations in more than 180 countries around the world.

Trinasolar Australia supplies solar panels to engineering, procurement and construction (EPC) project partners, solar farm constructors, and wholesalers. All Australian employees are engaged under lawful labour contracts in accordance with local regulations and are free to associate with unions of their choosing.

Trinasolar Group is committed to corporate social responsibility, including the elimination of all forms of modern slavery. It adheres to ethical business practices through a suite of governance documents, including:

- Code of Business Conduct and Ethics for Trinasolar's employees;
- Trinasolar ESG Management Policy;
- Trinasolar Global Human Rights Principles;
- Employee Handbook(s) as published for respective subsidiaries and regions;
- Anti-bribery Compliance Management Policy;
- Trinasolar Supply Chain Due Diligence Manual;
- Corporate Social Responsibility Code of Conduct of Trinasolar Supplier;
- Trinasolar's Supplier Sustainable Sourcing Guidelines; and
- Responsible Mineral Management Policy.

Trinasolar Group values transparency and continuously improves its tools and systems to identify and address modern slavery risks.



# Trinasolar's Supply Chain

**Trinasolar's supply chain covers various types of procurement products that can be classified into the following categories:**

- Raw materials;
- Auxiliary materials;
- Infrastructure;
- Equipment;
- Accessories;
- Packaging;
- Logistics and other services;
- Transportation;
- Maintenance, Repair and Operations supplies; and
- Third-party certification services.

Trinasolar's suppliers, primarily located in China, are centrally managed by Trinasolar Group's procurement department in China. To mitigate and manage any supply chain risks, Trinasolar has developed and implemented the Trinasolar Supply Chain Due Diligence System, which incorporates comprehensive policies including Supply Chain Due Diligence Manual, Trinasolar's Supplier Sustainable Sourcing Guidelines, Responsible Mineral Management Policy and Conflict Minerals Management Measures. Trinasolar integrated ESG factors into key steps throughout supplier management. Environmental and occupational health and safety related certificates (i.e. ISO 14001, ISO 45001 and ISO 50001) or equivalent management systems are mandatory during primary risk assessments of potential suppliers.

Suppliers are required to sign and comply with Trinasolar's Supplier Corporate Social Responsibility Code of Conduct, the Supplier ESG Commitment, the Commitment Letter on Lawful Employment and the Commitment on Non-Use of Conflict Minerals at the onboarding stage.

Due Diligence is conducted on key suppliers and suppliers assessed with high/medium risk, using a checklist referencing standards of reputable independent third parties such as the OECD and Solar Stewardship Initiative. Any non-conformities identified during due diligence are tracked until rectified. The suppliers are also contractually obligated to cascade all environmental and human rights requirements to their upstream suppliers.

In 2025, Trinasolar conducted targeted ESG empowerment training for suppliers as well as dissemination of ESG best practices relevant to their industries, covering 520 significant suppliers representing 80 per cent of the Tier-1 significant suppliers.

Trinasolar Group owns and operates manufacturing production plants in the Chinese cities of Changzhou, Suqian, Yiwu, Yancheng, Huai'an, Qinghai, Yangzhou, Deyang, the Inner Mongolia region, as well as in Vietnam and Thailand.

In 2024, Trinasolar's Yancheng Dafeng Factory passed the TÜV Rheinland "Zero Waste" and "Zero Carbon" factory certification audits with high marks in environmental management system construction, energy conservation and emission reduction, and waste treatment. Adding to this milestone, in 2025, two factories of Trinasolar Group, Yancheng Dafeng and Yiwu base were the first solar company manufacturing sites to obtain the Solar Stewardship Initiative's



ESG standard certification. This accolade follows a rigorous TÜV Rheinland audit, which credits environmental, social and governance sustainability of sites, aligned with the requirements imposed by the EU Forced Labour Regulation and Corporate Sustainability Due Diligence Directive. Trinasolar overall attained the SA8000 Social Accountability Management System Certification in recognition of its broader commitment to responsible and sustainable business practices, and one factory has obtained the TÜV SÜD Business Social Compliance Initiative (BSCI) certification.

Identifying and cultivating relationships with ethical suppliers as well as compliance with local labour laws and protection of labour rights are critical components of Trinasolar's strategy, which ensures modern slavery risks across its global supply chain are identified and mitigated. All potential suppliers must demonstrate legal compliance with local labour laws as a prerequisite for qualification as a vendor for Trinasolar Group. Further details regarding Trinasolar's policies, actions and risk mitigation efforts are addressed in the following sections of this statement.



# Modern Slavery Risk Management

Trinasolar Group has classified modern slavery risks into external and internal categories. The external modern slavery risks are managed by Trinasolar Group's procurement team while any intercompany risks are managed by the human resources as well as legal and compliance departments of Trinasolar Australia, working closely with Trinasolar Group as a whole.

## **Areas of risks identified by Trinasolar within its business operations include:**

- Raw material suppliers;
- Storage and logistical providers;
- Trinasolar-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 Trinasolar Group's internal procurement practices and the robust supplier performance evaluation system in the supplier selection process. Trinasolar has established different selection principles and qualification standards to fulfil various procurement needs. It issues a Supplier ESG Audit Checklist with environmental, social, business and ethics as well as traceability related questions to prospective suppliers.

Based on the returned questionnaire, it assesses their compliance, environmental and social performance, and relevant qualification documents. In addition, it requires suppliers and partners to sign the Trinasolar Supplier Social Responsibility Agreement.

This document specifies that all suppliers and their supply chains must understand and comply with Trinasolar's policies on environmental, occupational health and safety, social responsibility and responsible sourcing management, as well as the Trinasolar Supplier Corporate Social Responsibility Code of Conduct. As part of this evaluation process, Trinasolar reviews policies and records provided by suppliers such as their employee working hours and wages, any reported business 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 rigorously assessed against the Trinasolar Supplier Corporate Social Responsibility Code of Conduct. Any non-compliance with the established criteria shall require suppliers to take immediate remedial action within the specified timeframe. Failure to do so will result in immediate suspension or termination.



Internally, Trinasolar Group's human resources department regularly updates the employee handbook for respective subsidiaries, including that of Trinasolar Australia, to ensure the latest labour laws and the rights of employees are clearly addressed and provided for in each subsidiary's human resources practice.

Additionally, it offers online courses to all employees and conducts an annual engagement survey to measure employee views on various aspects such as fair treatment, health and safety, benefits, and training opportunities. These initiatives help maintain Trinasolar Group's commitment to fostering a respectful and ethical work environment.





# Policies and Governance

Trinasolar is deeply committed to upholding internationally recognised human rights principles across its operations and throughout its value chain. This commitment extends to the Universal Declaration of Human Rights, United Nations Global Compact (UNGC), the ILO Declaration on Fundamental Principles and Rights at Work, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the UK Modern Slavery Act 2015, the Australia Modern Slavery Act 2018 and the applicable laws of the countries in which Trinasolar operates. Trinasolar is dedicated to continuously integrating these universal human rights principles into its strategies, policies and procedures, thereby establishing a culture of integrity that is foundational to its long-term success.

To manage and mitigate modern slavery risks, Trinasolar has established an integrated management system across its operations. It is continuously committed to maintaining and enhancing this system to prevent any potential internal or external risks of modern slavery or other human rights violations. Its approach includes the following policies, regulations, and procedures designed to address these risks and ensure compliance with global human rights standards.

## Documents accessible on its official website:

- a) [Trinasolar Global Human Rights Principles](#)
- b) [2024 Reconfirmation of the Product Stewardship Policy](#)
- c) [Environment, Occupational Health & Safety \(EHS\) and Energy Management Policy](#)
- d) [Corporate Social Responsibility Code of Conduct of Trinasolar Supplier](#)
- e) [Trinasolar Supply Chain Due Diligence Manual](#)
- f) [Trinasolar ESG Management Policy](#)
- g) [Trinasolar's Supplier Sustainable Sourcing Guidelines](#)
- h) [Responsible Mineral Management Policy](#)

The Code of Business Conduct and Ethics for Trinasolar's employees is available upon request.

Trinasolar Group is fully committed to ensuring that its products and supply chains are free from any materials that have been produced, manufactured or provided using any form of forced labour or slavery. It has established a dedicated team responsible for developing and monitoring compliance with all modern slavery regulations. This team includes:

- Internal Audit;
- ESG Management;
- Legal Department;
- Human Resources;
- Procurement;
- Supply Chain Strategy;
- Quality Control; and
- Brand Management.

Trinasolar Group publishes its Sustainability Report annually based on standard social responsibility assessments integrated with results from annual inspections and evaluations of all its suppliers. Its global procurement team vigilantly monitors Trinasolar Group's global supply chain partners to ascertain that they do not engage in or support any form of forced labour practices.



# Actions

Trinasolar Group diligently maintains and periodically updates its Code of Business Conduct and Ethics for Trinasolar's Employees and Trinasolar Global Human Rights Principles, which strongly emphasise the protection of human rights and the fair treatment of all workers. This Code and principles, mandatory for all employees, outline the company's core values and guiding principles, ensuring that business operations are conducted ethically and in compliance with all relevant laws, rules, and regulations across the regions it operates. All employees within Trinasolar Group as well as contractors and consultants who perform work on Trinasolar's behalf are provided with comprehensive training on this Code to ensure awareness of the risks associated with modern slavery and human trafficking. This training is mandatory for all employees.

Trinasolar Group conducts ongoing specialised compliance training for all overseas employees, focusing on "Anti-fraud Prevalence and Code of Conduct". This initiative further strengthens employees' adherence to the Code of Business Conduct and Ethics, while upholding human rights and ensuring fair treatment of all employees.

Trinasolar Group also evaluates suppliers on various aspects, including Labour Practice, Social Responsibility, Safety, Environmental Protection, and Traceability. Based on these evaluations, it assesses and recognises suppliers, providing targeted communication, training and counselling. Suppliers that fail to eliminate risks detected over time face restricted procurement, freezing or elimination.

Trinasolar Supplier Corporate Social Responsibility Code of Conduct emphasises environmental and social standards for all suppliers and provides reporting channels to encourage mutual monitoring. Each supplier's ESG performance is fully integrated into the supplier performance evaluation.

## **For supplier social standards evaluation, the checkpoints focus on:**

- Commitments, policies, or statements regarding respect for human rights that comply with or exceed international and national laws and regulations;
- Strict prohibition of child labour (including interns);
- Strict prohibition of forced labour (including interns);
- Freedom of association and collective bargaining;
- Anti-discrimination; and
- Working hour and wage management.



Trinasolar Group's standard supply and/or service agreements globally include labour and legal compliance clauses to reinforce these commitments.

Additionally, all Trinasolar Group and Trinasolar 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 Trinasolar's auditing and supervision department through a fully confidential and anonymous hotline, or by emailing [IA@trinasolar.com](mailto:IA@trinasolar.com).

Finally, all new suppliers must sign and execute the Trinasolar Supplier Social Responsibility Agreement confirming the lawful employment of all their workers as a condition of becoming a qualified supplier for Trinasolar Group. This letter mandates the timely payment of salaries in accordance with local laws, provision of insurance coverage for employees, adherence to legal working hours, and a strict prohibition against employing underage or forced labour.

Moreover, Trinasolar prioritised the development and deployment of digital traceability platforms. It established an integrated digital traceability system, enabling end-to-end traceability management from raw material procurement to product delivery, which provides customers with detailed reports on the materials used in specific shipments of solar modules. In 2025, Trinasolar received the highest possible AA rating for PV supply chain traceability from TÜV Rheinland, across the full range of key segments of polysilicon, ingots, wafers, cells and modules. The rating demonstrates the effectiveness of Trinasolar's robust supply chain management policies and its actual consistent transparency. These successful systems, practices and policies underpin Trinasolar's effective identification, management and continuing reduction of modern slavery risks within its supply chain.



# Assessment of Effectiveness

**Trinasolar recognises that the risk of modern slavery is an ongoing concern and is committed to undertaking efforts to mitigate these risks. To accurately assess and enhance the effectiveness of its strategies, Trinasolar continuously implementing the following measures:**

- Continued delivery of comprehensive training programmes to employees and suppliers to heighten awareness of modern slavery risks;
- Regular assessments of supplier compliance with Trina Solar Supplier Corporate Social Responsibility Code of Conduct and continuous monitoring of responses to Trinasolar Group's supplier Know Your Customer (KYC) questionnaire;
- Ongoing reviews of key supplier agreements to ensure they include specific provisions addressing modern slavery;
- Encouragement of self-reporting from Trinasolar Group and Trinasolar Australia's external partners regarding any identified or suspected issues related to modern slavery; and
- Conducting of annual ESG internal audits and management reviews, focusing on forced labour, human trafficking, child labour, freedom of association, right to collective bargaining, wages and benefits, occupational health and safety, and anti-discrimination recruitment, which deepens understanding of potential human rights impact on employees and ensures continuous improvement of management systems and measures.





Trinasolar Group's commitment to sustainability has been externally audited since 2014 by EcoVadis, a leading independent auditor of business sustainability ratings worldwide. Trinasolar Group has consistently achieved good scores in its corporate social responsibility performance, particularly in environmental protection and employee rights, as evidenced by numerous awards from EcoVadis. In 2025, Trinasolar Group obtained the Silver Medal in EcoVadis 2025 Sustainability Rating, ranking among the top 12 per cent of the 150,000

companies assessed worldwide. Trinasolar's annual Sustainability Report, and all relevant certificates and accolades can be viewed at <https://www.trinasolar.com/en-au/download/>. Trinasolar Group is also certified under ISO14001 Environmental Management Systems, ISO45001 for Occupational Health and Safety Management Systems and ISO37301 for Compliance Management System, further underscoring its dedication to maintaining safe and ethical working conditions and a robust compliance management system.





# Continuous Improvement

Trinasolar acknowledges the importance of a zero-tolerance policy towards modern slavery within its ecosystem and recognises the need for ongoing improvements to its risk management system.

**To this end, Trinasolar Group and Trinasolar Australia have pinpointed several key areas for enhanced focus and future development.**

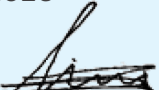
- **Code of Conduct and Industry Standards Review:** Regular examination of industry codes of conduct and best practices standards is essential to ascertain how these can be better integrated into Trinasolar's practices, ensuring timely improvements are made.
- **Process Automation:** Trinasolar is exploring options for the automation and streamlining of processes between itself and its suppliers through third-party solutions to enhance efficiency.
- **Performance Monitoring:** Ongoing assessment of Trinasolar Group's progress and performance, both internally and externally, is critical to ensure continuous improvement.
- **Third-Party Audits:** Trinasolar seeks to increase the frequency, scope and variety of third-party audits, both of its facilities and its general processes, to validate compliance and assess working conditions on the ground.
- **Country-Specific Risk Mapping:** Trinasolar continues to refine its supplier risk assessments by incorporating country-specific human rights data to tailor due diligence efforts more effectively.
- **Enhanced Engagement:** It aims to maintain continuous dialogue with employees, external partners, and service providers on all matters related to modern slavery risks. This ensures alignment with the expectations of Trinasolar Group as well as compliance with all applicable local jurisdictions.
- **Employee Feedback Loops:** Internal surveys continue to be enhanced to include specific questions on ethical conduct, perceived risks, and human rights concerns, ensuring frontline insights inform continuous improvement.

# Process of Consultation with Any Entities the Reporting Entity Owns or Controls

Trinasolar Australia does not own or control any other entities and is therefore not required to report under section 16(1)(f) of the Act. However, during the preparation of this statement, it engaged in collaborative discussions with various entities within the Trinasolar Group. These discussions focused on understanding the reporting obligations of the Act, exchanging ideas on actions to fulfil these obligations, and ensuring that all relevant parties were well-informed and provided with the latest materials and updates throughout the process.

**This statement was approved and signed by Ms. Liu Teng as the Sole Director and principal governing body of Trina Solar (Australia) Pty Ltd.**

Date: 26 June 2026

Signature: 

Name: Liu Teng

Title: Sole Director of Trina Solar (Australia) Pty Ltd





**General enquiries**

Tel: +61 1300 874 627 Fax: +61 2 9199 8006  
(9:00am to 4:30pm Monday to Friday)

2 Banfield Road  
Macquarie Park NSW 2113  
ACN: 150 695 524

[www.trinasolar.com/au](http://www.trinasolar.com/au)

**Trina**solar