

# Goldwind Australia Modern Slavery Statement

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JUNE 2022





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# Message from the CEO

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“Goldwind Australia holds a deep respect for the foundation of human rights and the ethical manufacturing and supply of clean energy products and solutions.”

Since its founding more than 20 years ago, Goldwind has respected fundamental human rights and fair labour practices, setting higher standards internally and among its global supply chains.

This is our second Modern Slavery Act Statement, and a voluntary one for Goldwind Australia because we aspire to take our actions and commitments around modern slavery beyond compliance.

Modern slavery has no place in our business, and we strictly prohibit the use of any form of child labour, forced labour, bonded labour or the trafficking of persons through our company operations and within our global supply chain.

Supply chains in our modern world are extensive and the COVID-19 pandemic has seen increased levels of individual and community isolation, economic disruption, social and geo-political tensions and unethical practices take advantage of the increased vulnerability.

It is even more important now to widen our sphere of awareness and strive to apply our influence to prevent instances where people are forced to work, or have their freedom restricted by means of violence, threat or illegal restrictions and imposition.

We hold a deep respect for the foundation of human rights and prohibit any form of child or forced labour,

bonded labour, or modern slavery in any form and we must continue to extend this importance across our supply chain – as well as our suppliers’ suppliers.

We are proud of the progress we have made in 2021 to ensure there is no place for slavery and human trafficking in our operations and supply chain including having independent human rights specialists deliver risk assessments, undertake globally recognised audits and commencing the preparation of a governance and reporting framework for our Clarke Creek Wind Farm Turbine Supply and Installation (TSI) project.

There is still a lot of work to do, and our focus for the next 12 months continues with training our staff to identify modern slavery risks in procurement and formalising Goldwind Australia’s approach to the management of modern slavery through a Modern Slavery Risk Management Framework.

Our continued focus on Modern Slavery will ensure a brighter tomorrow for the world we live in.

**Ning Chen, CEO**





# Introductory statement

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Goldwind Australia Pty Ltd ACN 140 108 390 (Goldwind Australia) is committed to the corporate responsibility to respect human rights, including for our employees and the people in our supply chain. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems to combat modern slavery.

We are pleased to outline the progress we have made in our approach towards managing modern slavery risks within our business. This is our second Modern Slavery Statement (Statement) under the Australian Modern Slavery Act 2018 (Cth) (the Act).

Although neither Goldwind Australia nor any of our other entities carrying on business in Australia, have met the financial threshold for reporting under the Act for the Reporting Period (1 January 2021 – 31 December 2021) (Reporting Period), we are voluntarily issuing this Statement as part of our commitment towards combatting modern slavery.



This Statement covers the seven mandatory reporting criteria under the Act. The table below indicates where within this Statement each criterion is addressed.

| Mandatory Reporting Criteria  | Section         |
|---|-----------------|
| <p><b>Reporting Entity</b><br/>Identify the Reporting Entity</p>  | <p><b>3</b></p> |
| <p><b>Reporting Entity: company structure</b><br/>Describe the reporting entity's structure, operations and supply chains</p>   | <p><b>3</b></p> |
| <p><b>Understanding our modern slavery risk areas</b><br/>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls</p>                                 | <p><b>4</b></p> |
| <p><b>Our actions to address modern slavery risks</b><br/>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</p>    | <p><b>5</b></p> |
| <p><b>Assessing the effectiveness of our actions</b><br/>Describe how the Reporting Entity assesses the effectiveness of these actions</p>  | <p><b>6</b></p> |
| <p><b>Consultation with associated entities</b><br/>Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)</p> | <p><b>7</b></p> |
| <p>Any other relevant information</p>   | <p><b>8</b></p> |



# Our organisation

## 3.1 Reporting Entity

This document is a Modern Slavery Statement pursuant to sections 6 and 13 of the Act for the voluntary reporting entity Goldwind Australia Pty Ltd ACN 140 108 390 (the Reporting Entity).

The Reporting Entity is an Australian proprietary limited company incorporated under the Corporations Act 2001 (Cth) and registered with ASIC.

## 3.2 Reporting Entity: company structure

The Reporting Entity is a wholly owned subsidiary of Goldwind International Holdings (HK) Limited, a company incorporated 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.

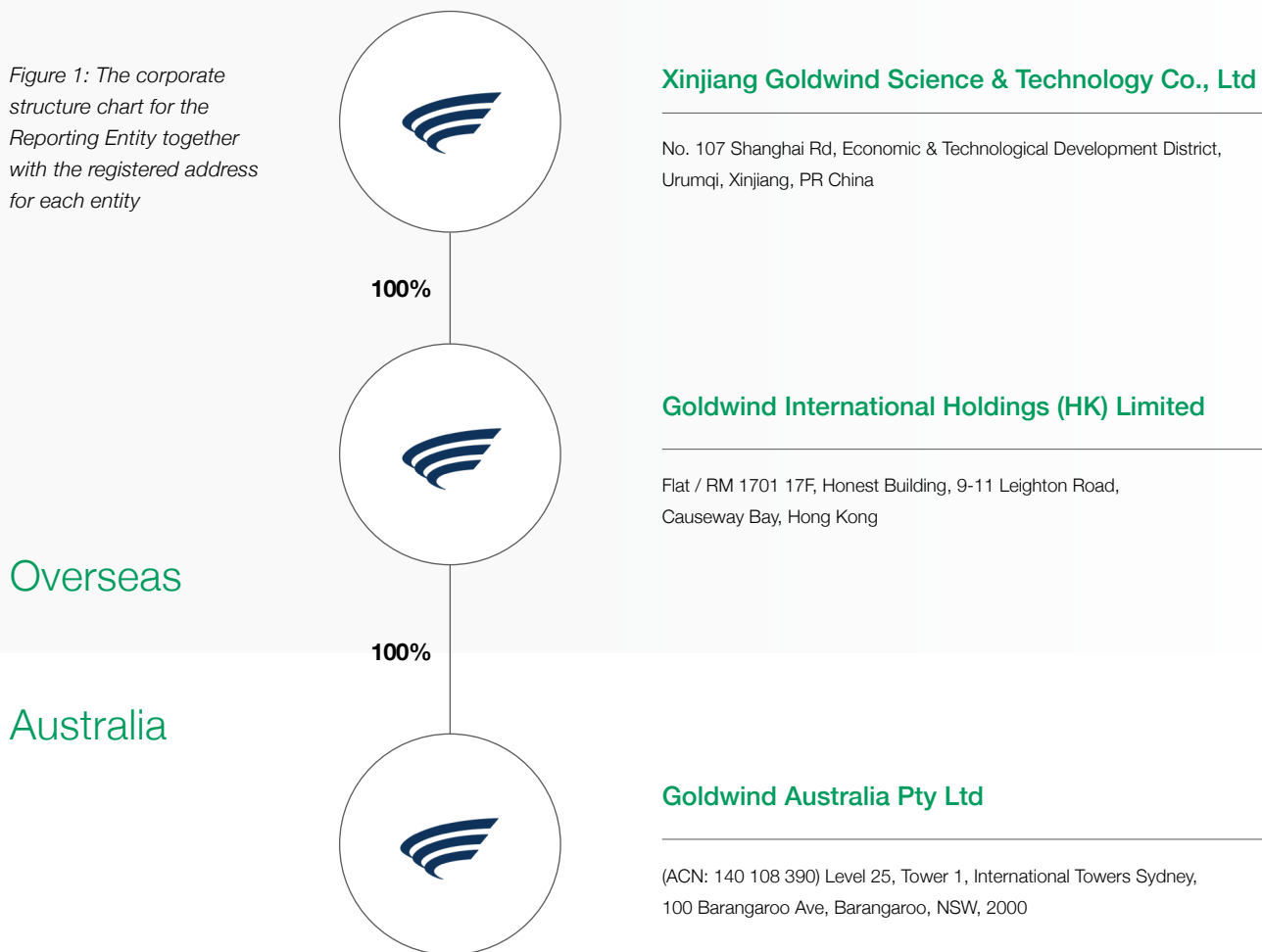
The Reporting Entity does not own or control any other companies or corporate entities.





# Goldwind corporate structure

Figure 1: The corporate structure chart for the Reporting Entity together with the registered address for each entity



## Xinjiang Goldwind Science & Technology Co., Ltd

No. 107 Shanghai Rd, Economic & Technological Development District, Urumqi, Xinjiang, PR China

## Goldwind International Holdings (HK) Limited

Flat / RM 1701 17F, Honest Building, 9-11 Leighton Road, Causeway Bay, Hong Kong

## Goldwind Australia Pty Ltd

(ACN: 140 108 390) Level 25, Tower 1, International Towers Sydney, 100 Barangaroo Ave, Barangaroo, NSW, 2000

### Figure 1: Corporate structure chart for Reporting Entity

The Reporting Entity's 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).

The diverse breadth of shareholders (as at 31 December 2021) 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 delivered over 44,000 wind turbines all over the world with a global cumulative installed capacity exceeding 86GW and an operations and maintenance (O&M) service capacity exceeding 50GW across six continents and 32 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.goldwind.com](http://www.goldwind.com).

Goldwind Science & Technology investor and stock exchange documents and information can be found at: [www.goldwind.com/en/invest](http://www.goldwind.com/en/invest).



### 3.3 Reporting Entity: operational structure

The Reporting Entity carries out the following types of business within the renewable energy sector in Australia:



#### Development business

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The investment in and acquisition and development of renewable energy projects (including wind and solar farms).



#### OEM (original equipment manufacturer) business

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The sale and supply of wind turbine components and the construction and installation of renewable energy projects (including wind and solar farms).



#### Services business

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The servicing, maintenance and asset management of renewable energy projects (including wind and solar farms).



#### Energy management business

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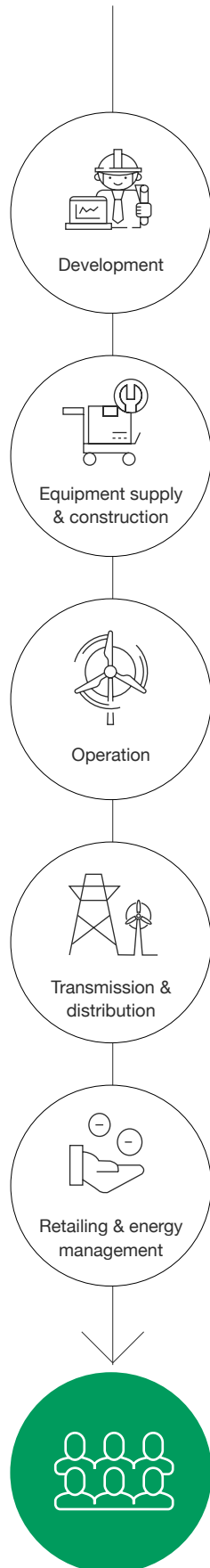
The management of wholesale trading relating to renewable energy projects (including wind and solar farms).





# Renewable energy value chain

Figure 2 on this page shows the renewable energy sector value chain and how each of the Reporting Entity's businesses fit within the value chain.



## Goldwind Australia roles

### Development business

|                         |                          |                                      |
|-------------------------|--------------------------|--------------------------------------|
| Greenfields development | Development partnerships | Wind, solar, dispatchable generation |
|-------------------------|--------------------------|--------------------------------------|

### OEM business

|                        |              |  |
|------------------------|--------------|--|
| Turbine sales & supply | Installation | Engineering, Procurement & Construction (EPC) /<br>Engineering, Procurement & Construction Management (EPCM) |
|------------------------|--------------|--|

### Service business

|   |                  |
|---|------------------|
| Warranty, Operation and Maintenance (WOM) | Asset management |
|---|------------------|

### Energy management business

|                   |
|-------------------|
| Wholesale trading |
|-------------------|

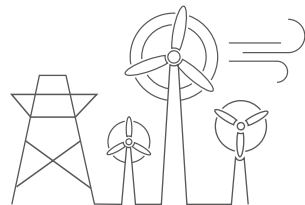
Energy customer



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

|                     |
|---------------------|
| Investment          |
| Sales & marketing   |
| Program delivery    |
| Service             |
| Grid & SCADA        |
| Corporate services* |

\*Comprising Human Resources, Information Technology (I.T.), Communications, Legal, and Health, Safety, Environment & Quality.



As at 31 December 2021, Goldwind Australia Pty Ltd directly employed 185 employees in Australia

The Reporting Entity operates 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 |

The Reporting Entity is the main contracting entity for all projects in Australia outside of Tasmania and Queensland but, in practice, the Reporting Entity and its related entities operate as a single business in Australia.

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 Entity's corporate group and other projects are wholly owned by third parties.



# Reporting Entities: supply chains

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



## 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.



## Construction, installation and logistics

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.



## Outsourced services

Including I.T. technical support and staff payroll.

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.



## Asset management services

Engineers and technicians performing onsite servicing and maintenance work for renewable energy projects.



## Professional consultancy services

Including engineering, environmental, planning, legal, accounting, 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.



## Support services

Services ancillary to its operations such as fleet, labour-hire, equipment-hire, software, cleaning and security.





The Reporting Entity procures the majority of the major wind turbine components described above from its parent company in China and some of the wind turbine tower components from local Australian manufacturers.

The Reporting Entity procures the remainder of the above goods and services locally in Australia from suppliers predominantly based in Australia.

From time to time, the Reporting Entity 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 Entity aims to utilise local suppliers and service providers within the vicinity of its 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 Entity see high levels of local industry participation in its projects. In addition, the Reporting Entity aims to employ locals to operate and maintain its projects post-construction over their lifetime. The Reporting Entity also often engages closely with key subcontractors to ensure local employment is encouraged.





# Understanding our modern slavery risk areas







## 4.1 Our approach

We understand the term 'modern slavery' to include:

Human trafficking

Slavery

Servitude

Forced labour

Debt bondage

Forced marriage, and

Any form of child labour

Modern slavery risk describes the potential adverse harm to people that a business can have across their operations and supply chain.

We acknowledge that there are inherent modern slavery risks within our business, that need to be identified, assessed, mitigated and addressed as part of our responsibility to respect human rights.

In this Reporting Period the previously identified risks were not reviewed and updated. However, we worked with human rights specialists in 2022 to identify key areas of inherent modern slavery risk across our operations and supply chain, which we wish to disclose as part of this Statement (*see 4.2 Modern slavery risk categories below*).

We acknowledge that these identified inherent areas of modern slavery risk were present in our business during the Reporting Period.

The following four inherent risk indicators were considered as part of this inherent risk identification process:

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## 1. Presence of vulnerable populations

People and communities that are inherently more vulnerable than others to experiencing modern slavery and its impacts. Examples include base-skilled labour, migrant labour and non-native language speakers.

## 2. High risk business models

Certain businesses and supply-chain structures that limit visibility of workers and their working conditions are associated with modern slavery. Examples include outsourcing and labour hire, aggressive pricing strategies, long and complex supply chains and seasonal labour demand.

## 3. High risk sectors and categories

Certain sectors and categories are more likely to contribute to modern slavery due to prevalent labour rights issues throughout the value chain. Examples include cleaning and security services, logistics and transport, mining and processing of conflict minerals.

## 4. High risk geographies

Modern slavery is more likely to occur in geographic areas where there is a weak rule of law, conflict, corruption, displacement and poor adherence to labour laws.

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We recognise that where these inherent risk indicators intersect, there is an increased possibility that actual harm to people is being experienced.

From this analysis, we identified areas of high risk that were known and reported in our previous Modern Slavery Statement, and new areas for us to assess and address (see 4.2 *Modern slavery risk areas on the next page*).



## 4.2 Modern slavery risk categories

We did not identify any instances of modern slavery within our operations or supply chain during the Reporting Period. However, we identified a number of high-risk areas based on inherent modern slavery risk indicators that were present.

It is important to note that these areas represent inherent modern slavery risks only.

Actions taken to manage these risks are detailed at *Section 5 - Our actions to assess and address modern slavery risks*.

Furthermore, additional steps to assess saliency, conduct a residual risk assessment, and implement controls activities have been identified as key next steps in our commitments for the next reporting period (*see Section 7 – Planned next steps*).

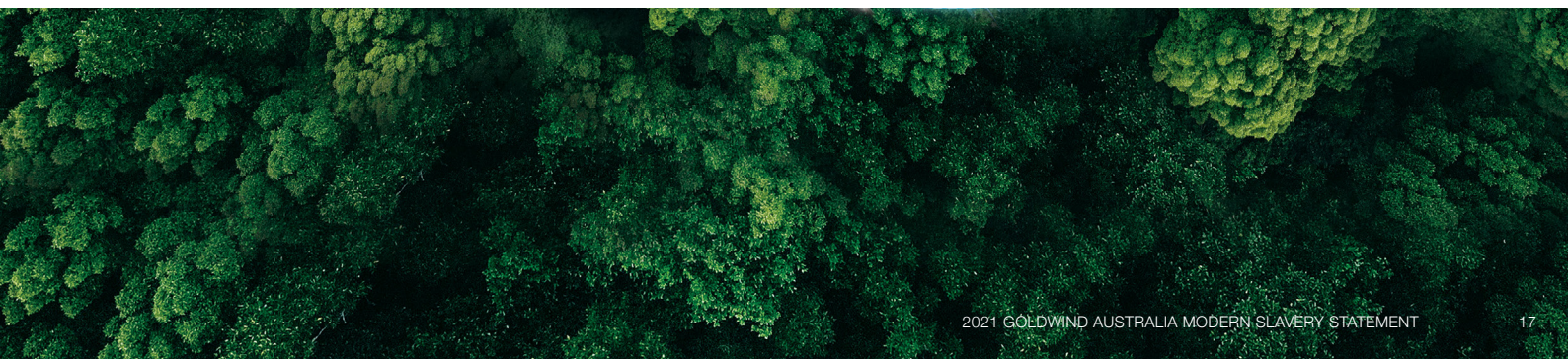
### Identified areas of inherent modern slavery risk

| Area                                  | Description  | Description of identified inherent risk indicators   |
|---------------------------------------|--|--|
| <p><b>Wind turbine components</b></p> | <p>Includes all components that make up a wind turbine, including the wind turbine tower sections, blades and generators.</p> <p>These components are sourced as a single purchase from Goldwind Australia’s parent company, Xinjiang Goldwind Science &amp; Technology Co. Ltd (Goldwind International).</p> <p>Goldwind International manufactures and sources all wind turbine components in China, through various manufacturers that specialise in heavy steel fabrication, fibreglass and other material processing and manufacturing.</p> | <ul style="list-style-type: none"> <li>• Our supplier, Goldwind International has manufacturing centres throughout China, including in Xinjiang Uyghur Autonomous Region (Xinjiang region).</li> <li>• Raw materials and minerals that are used for wind turbines, are mined from areas that have significant human rights issues with low labour rights protections.</li> <li>• Wind turbines have a relatively deep supply chain - from raw materials, processing, manufacturing, logistics - this makes it harder to monitor and verify labour standards across the entire supply chain.</li> </ul> |



## Identified areas of inherent modern slavery risk (continued)

| Area   | Description   | Description of identified inherent risk indicators   |
|--|---|--|
| <p><b>Third-party arrangements and labour hire</b></p> | <p>Includes all third-party labour arrangements engaged by Goldwind Australia such as the following:</p> <ul style="list-style-type: none"> <li>• Electrical and mechanical trade roles are often outsourced via contract and sub-contracting arrangements,</li> <li>• Labour hire is used in both office and regional asset/construction settings,</li> <li>• Sub-contracting of land transportation</li> </ul> <p>Labour hire agencies are engaged to fill roles including construction workers, project-based work including document controllers and project managers and other office-based roles.</p> | <ul style="list-style-type: none"> <li>• Third-party arrangements, sub-contracting and the use of labour hire agencies are all considered to be high risk business models as they potentially create multiple layers between Goldwind Australia and the project workforce, therefore limiting visibility over recruitment and labour practices.</li> <li>• The use of contractors and sub-contractors overlaps with vulnerable populations including base-skill, migrant, low socioeconomic, or culturally and linguistically diverse backgrounds workers that are vulnerable to systemic issues such as underpayment, withholding of wages, and excessive working hours.</li> </ul> |
| <p><b>Shipping</b></p>                                 | <p>Refers to the transportation by sea of wind turbine components from China to Australia.</p> <p>Wind turbine components are extremely large and heavy, requiring specialised project cargo ships for transportation.</p>  | <ul style="list-style-type: none"> <li>• The shipping industry is a high risk sector due to the limited oversight and monitoring of working conditions when vessels are in transit.</li> <li>• There are vulnerable populations working in this sector, including base-skill, migrant, low socioeconomic, and culturally and linguistically diverse workers who are vulnerable to issues such as debt bondage and excessive working hours.</li> </ul>  |





## Identified areas of inherent modern slavery risk (continued)

| Area                                | Description  | Description of identified inherent risk indicators  |
|-------------------------------------|--|---|
| <p><b>On land logistics</b></p>     | <p>Includes the storage and transport of the wind turbine components on land in Australia. This includes the removal of the components onto land, the storage of these components onshore and the transportation by road transport of the wind blades, generator, and tower.</p> <p>Goldwind Australia is responsible for the logistics at the point in which these components are lifted and 'hanging off a hook' from the ship. There are a limited number of companies who can provide these services due to the size of the components involved.</p> | <ul style="list-style-type: none"> <li>• Warehousing and transport services are considered high risk for modern slavery as this sector has a high prevalence of vulnerable workers.</li> <li>• Sub-contracting and short-term contracts are also common in the logistics business model, which may limit Goldwind Australia's visibility over working conditions.</li> </ul>  |
| <p><b>Facilities management</b></p> | <p>Includes cleaning, security, catering, waste, and maintenance services engaged by Goldwind Australia across corporate offices, wind farm assets and on-site accommodation.</p>  | <ul style="list-style-type: none"> <li>• Facilities management services commonly have low barriers to entry. A high proportion of employees are on temporary visas and are not native English speakers, which make these workforces particularly vulnerable to exploitation and modern slavery practices.</li> <li>• Cleaning services are considered to be a high-risk industry in Australia due to prevalence of breaches of workplace laws, proliferation of fraudulent contracting arrangements, below minimum wage payments and poor job security, occupational health and safety issues and poor ethical treatment of workers.</li> <li>• Security services are also considered a high-risk sector in Australia due to high levels of sub-contracting, fraudulent contracting and poor working conditions and pay.</li> <li>• Facilities management services also use labour-hire agencies to fill labour shortages, which further decreases the visibility of the supply chain.</li> </ul> |

## Identified areas of inherent modern slavery risk (continued)

| Area  | Description  | Description of identified inherent risk indicators   |
|---|--|--|
| <p><b>Personal protective equipment (PPE)</b></p> | <p>Includes products that are procured to protect workers from COVID-19, such as face masks and gloves. It also comprises of all the standard equipment used to protect Goldwind Australia employees and those entering Goldwind Australia sites, such as hard hats, safety glasses, high visibility workwear and jumpsuits.</p> <p>PPE sourced is sourced by Goldwind Australia from multiple suppliers based in Australia who have supply chains both in Australia and overseas.</p> | <ul style="list-style-type: none"> <li>• The PPE and related garments and textiles industries are considered be a high risk sector due to widely reported issues with poor working conditions and exploitative labour practices.</li> <li>• The global surge in demand for products required for COVID-19 safety protocols and the limited time in which to produce them, have led to claims being made against PPE manufacturers claiming excessive overtime, poor working conditions and practices amounting to forced labour.</li> <li>• PPE is primarily manufactured in Asia – where there are many high risk countries in relation to poor labour practices and protections, increasing the likelihood of modern slavery practices.</li> </ul> |
| <p><b>ICT hardware</b></p>                        | <p>Includes mobile phones, laptops, tablets, monitors, and e-waste.</p>  | <ul style="list-style-type: none"> <li>• Global ICT hardware supply chains are long, opaque and complex involving many tiers, limiting Goldwind Australia’s visibility of working conditions throughout the supply chain.</li> <li>• These products are commonly manufactured utilising base-skilled workers in high risk countries/regions such as Asia and South East Asia.</li> <li>• There are known allegations of poor labour conditions in the ICT hardware supply chain including extremely low wages, long working hours, child labour and restrictions on freedom of association and right to collective bargaining.</li> </ul>  |



## Identified areas of inherent modern slavery risk (continued)

| Area                              | Description   | Description of identified inherent risk indicators  |
|-----------------------------------|---|---|
| <b>Chemicals</b>                  | Includes the range of chemicals, particularly oils used by Goldwind Australia in the installation and maintenance of wind turbines.   | <ul style="list-style-type: none"> <li>• These products are commonly mined and processed from areas that have significant human rights issues with low labour rights protections.</li> </ul>  |
| <b>Balance of plant materials</b> | <p>Refers to the various supporting and auxiliary components of a power plant system required to produce energy.</p> <p>This plant includes electrical items like inverters, transformers, switchgear, and circuit breakers. Goldwind Australia subcontracts the building of balance of plants including the procurement of all components to electrical engineering consultancies.</p> | <ul style="list-style-type: none"> <li>• The uncertain origin of the materials used in the manufacturing of balance of plant components and the location of manufacturers heightens the risk of exposure to modern slavery, particularly in relation to high risk sectors and geographies.</li> </ul> |

We also identified the following additional area that has high inherent modern slavery risks. Whilst we have not procured solar modules in the Reporting Period, there is potential for this to occur in the future. As such, we will monitor for any proposed procurement activity, and take steps to assess and address any risks.

| Area                 | Description   |
|----------------------|---|
| <b>Solar modules</b> | <p>This category includes all components of a solar panel modules, importantly this includes polysilicon used in solar photovoltaic (PV) technology.</p> <p>Goldwind Australia is not currently actively procuring solar products, and it has not procured any solar modules in FY21/22, however it currently has a solar farm attached to a wind farm asset.</p> <p>This area has been identified on the basis that the current solar farm, or potential future commercial ventures may require solar modules to be procured directly or indirectly for Goldwind Australia. As such, the modern slavery risks associated with this product should be considered.</p> |



## 4.3 Our actions to assess modern slavery risks

Goldwind Australia continues to develop its foundational processes to identify and manage modern slavery within our operations and supply chain.

We have started to establish procedures and processes aligned to the United Nations Guiding Principles on Business and Human Rights (UNGPs) to cement our corporate responsibility to human rights across our procurement and business-as-usual activities.

We engaged external human rights specialists to support us in identifying gaps and prioritising commitments to strengthen our approach over time, and guide next steps. Below we report on our current progress in relation to our policy commitment, accountabilities and governance, risk assessment, capability building, external stakeholder engagement and access to a grievance mechanism.

In this Reporting Period, we have focused on developing our modern slavery due diligence approach for the Clarke Creek Wind Farm TSI project (see *Figure 3: Case study - Clarke Creek Wind Farm TSI project*).

We anticipate that our approach in identifying, managing and monitoring modern slavery supplier risks for the Clarke Creek Wind Farm TSI project site, will provide a strong foundation for the development of our business-wide modern slavery risk management approach.



# Case Study

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Figure 3:

## Clarke Creek Wind Farm TSI project

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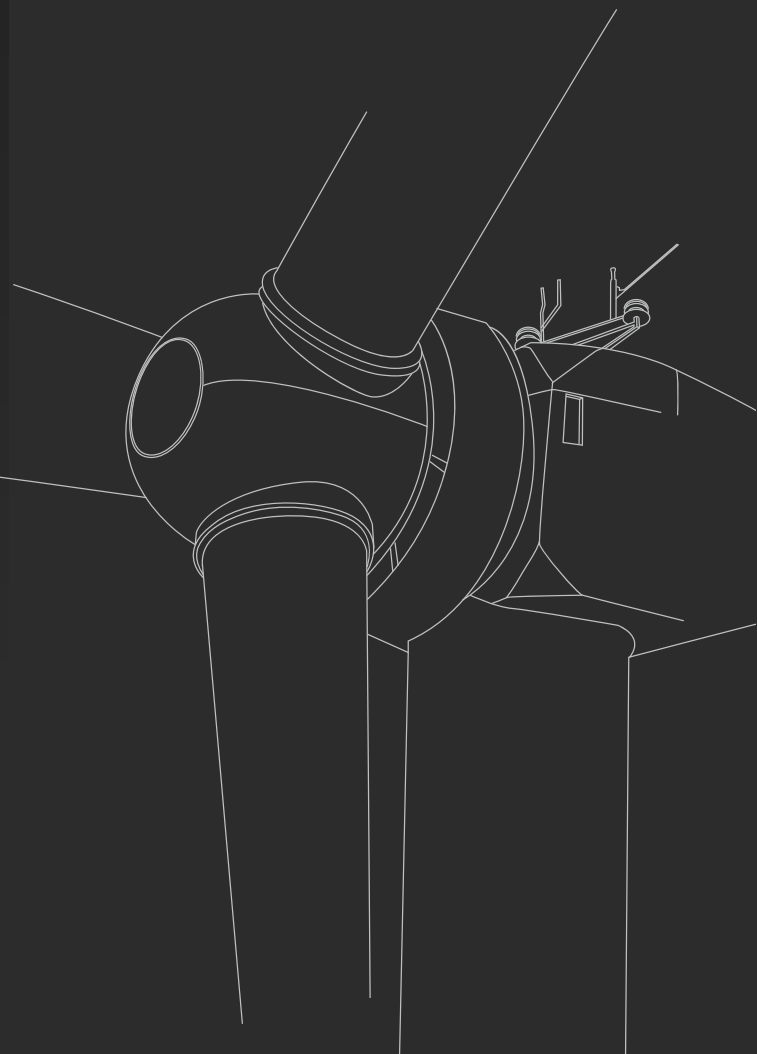
Clarke Creek Wind Farm TSI project is located 150 km north-west of Rockhampton in Central Queensland. As part of the sale and development of this project, Goldwind Australia engaged deeply with its buyer to understand and address modern slavery risks connected with this project.

To address modern slavery risks, Goldwind Australia engaged with external human rights specialists during the Reporting Period to support the development of a Supplier Modern Slavery Due Diligence Protocol, which provided a process flow for assessing and managing modern slavery risks.

### Key steps in this protocol include:

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- Inherent risk assessment of suppliers;
- Residual risk assessment of suppliers based on responses to a modern slavery self-assessment questionnaire;
- Social compliance audits; and
- Contracting.



As part of our commitment to a risk-based approach to enhancing our modern slavery response, we prioritised the assessment and management of modern slavery risks connected to the purchase of wind turbines supplied by Goldwind International.

These wind turbines were identified as high risk for modern slavery due to the location of Goldwind International's operations and manufacturing centres throughout China.

In particular, Goldwind Australia took traceability steps in collaboration with Goldwind International to confirm that none of the main turbine components supplied for the project, were to be manufactured in the Xinjiang region which is considered to be a very high risk region for modern slavery.

During the Reporting Period we were able to undertake the risk assessment and commence customised Environmental, Social and Governance (ESG) second-party audits of six facilities that manufactured key components of the wind turbines. The audit standards and checklist for the auditors referenced the ETI Base Code, SA 8000, ISO 26000, ISO 20400, ISO 45001 and ISO 37001.

The audits were predominately in-person, on-site audits (with the exception of two audits where audits were conducted remotely due to COVID-19 travel restrictions) and conducted by experienced social auditors.

Additionally, a governance and reporting framework was also set up in collaboration with the customer to monitor progress with suppliers, as well as our own maturing of procedures and mechanisms for modern slavery risk management.

The frequency of this reporting is monthly for the first 12 months of the project and quarterly thereafter.

At the time of the submission of this Statement, we have developed a draft modern slavery supplier risk management plan for this project which outlines the approach for identifying, assessing, monitoring and addressing modern slavery risk during the Clarke Creek Wind Farm TSI project, alongside governance and reporting processes.

This will be finalised and implemented in 2022 and more fully described in our next reporting period.





An aerial photograph of ocean waves crashing onto a dark beach. The water is a deep teal color, and the white foam of the waves is prominent. The beach is a dark, almost black sand. The text is overlaid on the top left of the image.

# Our actions to address modern slavery risks



## 5.1 Modern Slavery Policy

Goldwind Australia's Modern Slavery Policy forms the basis of our commitment and approach to addressing modern slavery in our operations and supply chains. This Policy was developed and adopted during the Reporting Period.

The Modern Slavery Policy applies to all persons working for Goldwind Australia or on its behalf in any capacity, including agency workers, seconded workers, agents, contractors, external consultants, third-party representatives and business partners. The Policy outlines our commitment to identifying, assessing and addressing risks of modern slavery and reporting transparently on these actions.

Further, it also identifies the specific responsibilities that key position holders have for the implementation of the Policy. This Policy will be reviewed in 2022 and updated to reflect our maturing modern slavery management and governance approach.

## 5.2 Accountabilities and governance

The Goldwind Australia CEO has overall responsibility for ensuring that Goldwind Australia complies with its modern slavery commitments and obligations including those outlined in the Modern Slavery Policy and the Act. The General Manager of Legal & Corporate Services is responsible for the overall monitoring and tracking modern slavery risks across Goldwind Australia's operations. A Modern Slavery Working Group was also formed in the Reporting Period with representatives

from each department to discuss progress with modern slavery risk management and raise any issues.

This governance structure will be formalised in the coming year as part of our update of the Modern Slavery Policy.

## 5.3 Risk assessment

### Supplier inherent risk assessments

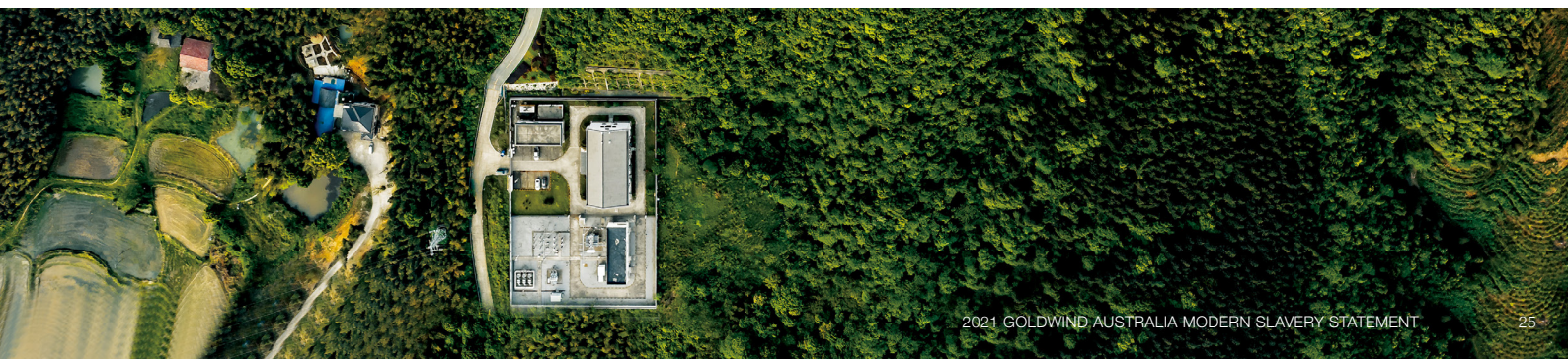
In the Previous Reporting Period (1 January 2020 to 31 December 2020) (Previous Reporting Period), a high-level process was undertaken to identify inherent modern slavery risks across Goldwind Australia's operations and supply chain.

Although these identified risks were not reviewed and updated in the Reporting Period, Goldwind Australia has engaged human rights specialists to conduct an in-depth inherent risk hotspot identification process at the time of the writing of this Statement. This assessment included reviewing existing documentation, spend information and interviews across Goldwind Australia's internal departments (see *Section 4.2 - Modern Slavery Risk Areas*, for inherent risk areas identified).

### Supplier residual risk assessments

In the Previous Reporting Period, suppliers to Goldwind Australia were asked to complete a modern slavery SAQ through the third-party risk management service CM3 and will be asked to update this SAQ on an annual basis.

A process has not yet been developed to formalise how Goldwind Australia will consider these SAQ responses as part of our business-wide approach to managing modern slavery risks.





However, during the Reporting Period we used these SAQ responses to understand residual modern slavery risks within our key suppliers for the Clarke Creek Wind Farm TSI project, in line with the process outlined in the Clarke Creek Supplier Modern Slavery Due Diligence Protocol. (See *Figure 3: Case study - Clarke Creek Wind Farm TSI project*).

## 5.4 Capability building

High-level modern slavery awareness raising was conducted during the Reporting Period. This included an executive-level briefing and organisation-wide communications on Goldwind Australia's second Modern Slavery Statement and the launch of Goldwind Australia's Modern Slavery Policy.

We recognise that enhanced awareness activities, and tailored training relevant for different levels and roles across the business is required to facilitate the implementation of our Modern Slavery Policy. We are committed to uplifting our modern slavery capability in 2022.

## 5.5 External stakeholder engagement

During the Reporting Period Goldwind Australia engaged with customers directly to understand their expectations in relation to the management and reporting of modern slavery. Goldwind Australia also joined the Clean Energy Council's Modern Slavery Working Group to understand

industry issues and opportunities to collaborate to address modern slavery risks within renewables supply chains.

Goldwind Australia has also continued to engage with its parent company, and supplier, Goldwind International to better understand how they are managing and monitoring modern slavery risks within its operations and supply chain.

As part of this engagement, we closely monitor outcomes of their supplier risk assessments.

## 5.6 Grievance mechanism

Goldwind Australia has a Whistleblower Policy and related processes that apply to both internal employees and also suppliers and their workers. The Whistleblower Policy is publicly available, and during the Reporting Period communications were provided to internal employees about the availability and purpose of this policy. Additionally, for internal employees there is also the Complaints Policy and process that can be used.

We are committed to reviewing existing grievance mechanisms to assess alignment with the UNGP's effectiveness criteria for grievance mechanisms.





# Assessing the effectiveness of our actions

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Goldwind Australia is still in the process of planning the development of a framework to evaluate the effectiveness of our modern slavery risk management systems and controls across Goldwind Australia's operations and supply chains.

As a starting point, we intend to assess the effectiveness of our risk assessments and other modern slavery risk management activities from the Clarke Creek Wind Farm TSI project, as part of the development of Goldwind Australia's modern slavery risk management plan.

## Consultation with associated entities

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Goldwind Australia does not have any wholly owned subsidiaries or control any other entities, however we are continuously in conversation with the related Goldwind International subsidiaries (including project-specific entities) operating in Australia.

These entities effectively operate as a single business in Australia under the management of one senior executive management team led by the CEO and so adhere to the same modern slavery policies and processes as Goldwind Australia.

The Goldwind Australia senior executive management team have been made aware of and approve the contents of this Statement.



# Planned next steps





While key actions have been undertaken in the last 6 months, we acknowledge that significant investments are required to develop and operationalise a rigorous company-wide Modern Slavery Risk Management Framework.

At the time of writing this Statement, Goldwind Australia has begun but is yet to complete the following key actions to assess and address our modern slavery risks:

- Development, communication and integration of a Supplier Social Responsibility Code of Conduct across our suppliers.
- Development and implementation of a modern slavery risk management plan for the Clarke Creek Wind Farm TSI project.

In addition, we are committed to the following key actions in 2022:

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## 1. Modern slavery policy

Revision and update our Modern Slavery Policy to reflect our maturing approach to modern slavery, including our governance and internal reporting process.

## 2. Risk assessment

Prioritisation of categories for further modern slavery due diligence, including conducting residual risk assessments.

## 3. Capability building

Strengthening the capability of Goldwind Australia's employees to identify and manage modern slavery risks through the provision of mandatory modern slavery awareness training for all employees, and specialised training to those who have specific roles and responsibilities for the management of modern slavery risks within Goldwind Australia.

## 4. Grievance mechanisms

Assessment of the extent to which Goldwind Australia's grievance mechanisms align with UNGP's effectiveness criteria and making changes where required, to align these mechanisms with these criteria, over time.

We will also continue to engage our employees and suppliers to strengthen awareness of available grievance mechanisms.

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In the coming 18 months, we are committed to formalising Goldwind Australia's approach to the management of modern slavery through a Modern Slavery Risk Management Framework.

This Framework will articulate our approach to modern slavery due diligence, ongoing monitoring, and assessment of modern slavery risks within our operations and supply chain. In addition, we are committed to developing modern slavery supplier risk management plans for each of our new projects going forward.

As part of this process, we will review the effectiveness of Clarke Creek Wind Farm TSI project's modern slavery supplier risk management plan.

Finally, we are committed to continuing to engage with key industry stakeholders and business partners to strengthen our approach to preventing and managing modern slavery risks. This includes ongoing engagement with our customers and the Clean Energy Council to advance industry approaches to manage modern slavery risks within the renewable energy supply chain.

## Board approval

Board of director approval from Goldwind Australia Pty Ltd was obtained for this Statement in accordance with the requirement under the Act.

This statement is signed by the CEO of Goldwind Australia Pty Ltd for the Reporting Period 1 January 2021 to 31 December 2021.



Signature:

A handwritten signature in black ink, appearing to be "Ning Chen", written over a horizontal line.

**Ning Chen, CEO**

Goldwind Australia Pty Ltd

Effective Date: 30 June 2022