Modern Slavery Statement

Reporting Period: 1 January 2025 to 31 December 2025

Reporting Entity: GLY Investments Pty Ltd (97 146 626 897) and its wholly owned subsidiary, Blue Sun Group Pty Ltd (47 149 641 887)

Statement Type: Joint Modern Slavery Statement

Introduction

This Joint Modern Slavery Statement is issued by GLY Investments Pty Ltd (97 146 626 897) in conjunction with its sole subsidiary Blue Sun Group Pty Ltd (47 149 641 887) for the reporting period ending 31 December 2025. GLY Investments Pty Ltd and Blue Sun Group Pty Ltd are incorporated in Australia and are committed to identifying, addressing, and preventing acts of modern slavery within the organization and across its global supply chains. During the reporting period, our principal place of business and registered office is located at 10-16 Titanium Ct. Crestmead QLD 4132.

Our core business involves wholesale distribution of renewable energy products and accessories, specifically solar panels and batteries, where we strive to be a leader in the Solar and Electrical industry. This document represents our annual statement produced in accordance with the mandatory reporting requirements of the *Commonwealth Modern Slavery Act 2018.*

To assess and lessen risks of exploitation in our operations and services, this joint statement details all actions which took place throughout the reporting period from 1 January 2025 to 31 December 2025. All references adhering to both the parent entity and its subsidiary will be stated alike examples of 'our group,' 'we,' or 'our' throughout this statement. Finally, this statement was formally reviewed and approved by the director and CEO on 9th January 2026.

Commitment

Our group maintains a high standard of business ethics both internally and for our external partners. We are committed to upholding human rights and ethical practices within our organization and across our entire supply chain. This commitment includes a policy against all forms of modern slavery, specifically addressing risks related to forced labour, child labour and human trafficking.

We are fully committed to conducting business in a lawful and ethical manner, which includes engaging exclusively with suppliers who display a clear regard for human rights. At a workplace level, we prioritize providing safe and inclusive environments for our own employees within our daily operations and uphold these same principles in our hiring procedures.

When engaging with our suppliers, Blue Sun Group Pty Ltd observes high ethical standards to carry out fair operations and protect the rights and interests of our business partners. We aim to take a leading role in encouraging our suppliers to fulfill their social responsibilities while supporting their growth.

Structure, Operations, and Supply Chains

GLY Investments Pty Ltd operates as the parent company of the Blue Sun Group Pty Ltd, which manages the wholesale distribution and commercial projects.

Operations consisting of warehouses and offices are centred in Australia, where a dedicated local team supports our customers across various sectors. As of the end of 31 December 2025, we employed 40 staff members who facilitated essential business, finance, warehousing and commercial solar projects. Additionally, we outsource administration and other operations to staff in the Philippines via agencies. We are committed to driving sustainability and responsible environmental management in line with recognized international standards.

Our supply chain is global and involves the procurement of complex products and raw materials. We receive supplies relating to solar panels, batteries, inverters, and mounting equipment through a diverse network of suppliers and vendors located primarily in China and Australia.

We maintain several supply partnerships with global leaders in the renewable energy sector, including JinkoSolar Holding Co., Ltd., Tongwei Co., Ltd. and Sigenergy Technology Co., Ltd. Additionally, we engage with third-party contractors to provide essential domestic services such as warehouse facilities in Western Australia and South Australia. Our main warehouse facilities are located in Queensland, Victoria and New South Wales. To reach our customers, we utilize a network of authorized distributors and freight, with whom we maintain formal contractual relationships that are reviewed and renewed on a regular basis.

Modern Slavery Risks

We recognize that potential risks of modern slavery and human trafficking may exist within our domestic and international operations and supply chains. Our risk assessment evaluates modern slavery by considering specific sectors, industries, countries and the nature of the products and services we procure.

Our internal operational risk in Australia is low due to a skilled workforce and strong local labour regulations. We recognize that modern slavery can be caused if our own internal recruitment or management procedures were bypassed, thus leading to exploitative conditions for our 40 Australian-based staff. Additionally, we have assessed modern slavery risks to be lower for our office workers involved in sales, finance, marketing and administration. Our commercial project division introduces inherent risk involving on-site physical labour, electrical contracting and construction-related activities as having vulnerabilities to modern slavery. This includes potential exposure to excessive working hours on-site and other unethical working conditions.

We acknowledge that we could contribute to these risks through procurement practices, such as excessive pressure to drive down costs. Specifically, procurement practices could contribute to modern slavery via the demand for unrealistic lead times or pushing for pricing below the cost of sustainable production, potentially forcing suppliers to exploit or withhold wages to meet our targets.

Blue Sun Group Pty Ltd recognizes potential direct links to modern slavery risks through third-party business relationships. We acknowledge that there are potential, inherent risks of unsafe working environments and child labour within the solar manufacturing industry. A high proportion of our solar and electrical products are sourced from suppliers operating in high-risk jurisdictions, including China. This creates a potential risk of being directly linked to exploitation through the manufacturing of solar panels and the extraction of raw materials by these third-party suppliers. As the global renewable energy supply chain heavily relies on components manufactured in high-risk regions, the inherent risk of potential exposure to forced labour practices lies deeper within our extended supply chains.

Furthermore, offshore outsourcing is utilized for specific business support functions, primarily based in the Philippines. While these services support our operational efficiency, we recognize the associated, geographic risks where worker vulnerabilities to dishonest recruitment, debt abuse or restriction of freedoms exist in overseas business outsourcing. We understand that we have a responsibility to ensure these workers are not subjected to exploitative practices, regardless of their location.

To further map out potential risks and identify areas of high-risk exposure, we utilize related, applicable industry standard practices as well as recommendations from third parties and ongoing due diligence to monitor our suppliers and their respective supply chains. We are currently reviewing the latest Modern Slavery Statements, Codes of Conduct, and internal policies of relevant suppliers to assess how these risks affect our operations. Blue Sun Group Pty Ltd is committed to working with these partners to ensure risks are managed appropriately, however, where issues cannot be resolved to our satisfaction, opportunities will be explored to replace them with compliant suppliers.

Actions Taken

Our group is committed to open and transparent business practices and has implemented several measures to manage and safeguard against modern slavery and human trafficking risks. We have established a comprehensive framework of policies and procedures to ensure our employees uphold these standards and that our suppliers are fully aware of our commitments.

Due Diligence and Risk Management

We are committed to high standards of corporate governance and utilize a range of procedural documents to provide a framework for protection against modern slavery. During the reporting period, we followed updated policies including our Employee Handbook, which outlines our corporate values, ethical principles, and the acceptable behaviours expected of our employees, contractors, and suppliers. Additionally, we utilized and took reference from the implementation of local and international laws and regulations regarding all stakeholders of our organisation.

Supply Chains

Supply chains for solar components are multi-tiered and complex, particularly where we lack direct contractual relationships regarding the extraction of raw materials. To maintain better oversight of our global supply chains and procurement systems, we have implemented the following due diligence activities:

- **Whistleblower Protections:** We maintain a formal Whistleblower Policy that specifically applies not only to employees but also to contractors and suppliers (including their employees). This allows for the reporting of conduct, which can be seen as dishonest, unethical, or oppressive behaviour without fear of victimisation.
- **Contractual & Regulatory Compliance:** We communicate our Equal Opportunities and Anti-Discrimination policies to all private contractors to remind them of their responsibilities regarding a neutral and safe workplace.
- **Information Mapping & Traceability:** We have implemented a process of acquiring information from direct suppliers regarding their operations, sub-suppliers and countries of origin. Specifically, this includes examining their own modern slavery statements, NGO reports, third-party audits and other compliance reports.

Internal Operations

To maintain strict oversight of our internal business environment and ensure our 40 Australian-based staff are protected from exploitative or unfair practices, we utilize the following daily operational controls:

- **Operational Oversight via BrightHR:** We utilize the BrightHR platform for essential workforce management, including the Blip application for strict time recording. This ensures all work hours are accurately captured and prevents "deceitful behaviour" such as working on behalf of others, which is a key control against forced labour or "invisible" shift work.
- **Financial Transparency via Xero & Superannuation:** We ensure fair compensation by scheduling superannuation contributions in line with Australian statutory requirements, currently at 12% as of 1 July 2025. We utilize Xero to manage these salary and entitlement obligations, ensuring a transparent audit trail of payments to all staff.
- **Recruitment Integrity:** Our recruitment and selection process is designed to be non-discriminatory, with short-listing and interviewing carried out by more than one person where possible to ensure merit-based hiring and prevent exploitative "hand-picked" recruitment.
- **On-Site Labor & Trade Integrity Vetting:** We enforce compliance and regulatory verification for on-site personnel. This includes verifying that electricians hold valid, active licenses and ensuring that safety training and site induction logs are audited alongside our BrightHR time records.

Awareness and Training

We recognize that internal training is vital in promoting awareness of modern slavery risks and responses. Our induction and policy framework covers:

- **Behavioural Standards:** Clear definitions of harassment and bullying, including physical, verbal, and non-verbal conduct that affects the dignity of anyone at work.
- **Reporting Instructions:** Detailed procedures for both informal and formal complaints, including the right for workers to be accompanied by a "support person" or "confidential helper" during investigations.
- **Mental Health Awareness:** Training on identifying workplace hazards that impact mental wellbeing, ensuring workers understand their role in maintaining a safe environment for themselves and others.
- **Serious Misconduct Penalties:** Explicit notification involving unlawful discrimination, harassment, or physical violence constitute serious misconduct and may result in immediate termination.

Remediation Process

If modern slavery is identified within our operations or supply chain, our organisation will engage proactively to remedy the issue. We provide professional guidance to help drive these improvements efficiently. However, we reserve the right to terminate supplier relationships if an issue is severe and cannot be remedied to align with our policies. We are committed to applying remediation via:

- **Victim Safety:** Immediate termination of a relationship will be avoided if said action has any chance of putting a victim at further risk. For example, through a sudden loss of income, debt bondage or deportation.
- **Remedy:** We will use our leverage with the supplier to provide a remedy, including compensation, formal apologies, or structural amendments to prevent recurrence.
- **Reporting:** Suspected modern slavery will be reported to the Australian Federal Police. If there is a risk of immediate harm, emergency services will be contacted.

Assessing Effectiveness

We recognize that an effective response to modern slavery requires continuous monitoring and evaluation of our established programs. The effectiveness of our actions is assessed to identify and remediate modern slavery risks through the following mechanisms:

Internal and External Monitoring

- **Audit and Time Tracking via BrightHR:** To ensure no deceitful behaviour, such as employees working on behalf of others, data from our Blip application for mandatory time recording is audited. This application monitors shift commencement, breaks, and finishes.

- **Payroll Reconciliation via Xero:** We conduct internal audits of our payroll through Xero to verify that all employees receive their correct statutory entitlements, including the 12% superannuation contribution and accrued leave.

- **Performance and Capability Reviews:** By monitoring the progression from informal discussions to formal warnings, we can analyse the frequency and outcomes of our formal Capability and Disciplinary procedures as to whether internal ethical standards are being understood and adopted.

To assess the effectiveness of our anti-slavery actions, measurable Key Performance Indicators (KPIs) have been established for the upcoming reporting period:

- **Compulsory Training:** We will ensure that 100% of all staff are trained in modern slavery awareness through broader training programmes as well as prioritise training for employees in high-risk roles such as procurement or supply chain management. All courses, programmes and training will require absolute completion. This is measured by BrightHR and self-monitored completion and gradings for training courses, compliance deadlines and other operational competencies.

- **Employee & Supplier Compliance:** Achieve a 100% return rate for signed Employee Handbook Acknowledgement Forms and require key suppliers to sign and adhere to a Supplier Code of Conduct.
- **Grievance Monitoring:** Track the resolution rate of any concerns raised through our Whistleblower or Grievance platforms, aiming for 100% of reports to be investigated and closed within 30 days.

Engagement and Reporting

- **Multi-Channel Whistleblower Platform:** We provide formal reporting channels to Senior Managers and Eligible Recipients (Director and HR) via telephone, email, or in person.
- **Anonymity and Protection:** Our policy guarantees that where a discloser wishes to remain anonymous, their identity will be protected during the investigation process, ensuring a safe environment for reporting modern slavery risks.
- **Grievance and Complaint Resolution:** We maintain a dual-track system for complaints using a Grievance Procedure for employment issues and a Bullying and Harassment Procedure for more sensitive matters. Both allow for the involvement of individual support.
- **Training and Acknowledgment Tracking:** All employees are required to sign a formal Employee Handbook Acknowledgement Form. We track the completion and signing of these forms to measure the reach and effectiveness of our internal ethical standards. Additionally, this keeps note of all contractual obligations to abide by our standards.
- **Assurance Reporting:** To ensure transparency, our policies are reviewed by senior leadership and updated regularly to reflect changes in Australian labour standards and organizational progress.

Commitment to Improvement

We are committed to the ongoing tracking of our actions and outcomes. By partnering with suppliers and undertaking regular internal governance and external assurance procedures, we aim to ensure our actions adhere to the UN Guiding Principles and all applicable labour and social compliance requirements.

Consultation with Owned/Controlled Entities

GLY Investments Pty Ltd has conducted internal consultation to prepare this Joint Modern Slavery Statement on behalf of itself and Blue Sun Group Pty Ltd. There is a streamlined corporate structure present, as GLY Investments Pty Ltd and Blue Sun Group Pty Ltd operate under fully unified governance and management. Specifically, LIANG CHEN serves as the Sole Director and Governing Body for both the parent entity and the subsidiary.

Due to this joint leadership, consultation between entities was naturally occurring and continuous, throughout the reporting period. As the overall decision-making process for the group rests with the same governing body, the objectives, risks and strategies were reviewed concurrently from both a parent-holding and subsidiary-operational perspective.

The shared executive leadership monitors the operational controls deployed across the group's architecture. However, rather than managing day-to-day administration, executive management focuses on high-level governance and strategies. This is done to ensure that compliance policies are properly executed by all departments, usually through procedures in human resources. This structure guarantees centralized procurement frameworks, employment standards, on-site project protocols and financial verification systems remain in accordance with statutory requirements across both entities.

Through this management structure, both GLY Investments Pty Ltd and Blue Sun Group Pty Ltd were engaged in the scoping, risk analysis and final approval of the documented controls within the joint statement.

Additionally, there was consistent consultation and collaboration between our departments consisting of the overarching policies, systems, and processes designed to be applied across our organisation.

This joint statement is the result of collaborative work across several key departments, including:

- Finance
- Marketing
- Sales
- Warehousing Operations
- Commercial Projects

Following this collaborative process, this statement was put before LIANG CHEN for final review and approval.

Approval and Signature

This Joint Modern Slavery Statement was formally reviewed and approved by the **authority of the Sole Director and governing body of the entities** of GLY INVESTMENTS PTY LTD and BLUE SUN GROUP PTY LTD.

Signed: ____________________________

Name: LIANG CHEN

Title: Sole Director, GLY INVESTMENTS PTY LTD & BLUE SUN GROUP PTY LTD

Date: 09/01/2026