LONG Modern Slavery Statement

LONGi Solar Australia Pty Ltd CY2022

This statement covers the activities of LONGi Solar Australia Pty Ltd (ACN 632 322 288) (LONGi Australia) during the calendar year ended 31 December 2022.

This is our second modern slavery statement under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the Board of LONGi Australia on 26 June 2023.

About us

LONGi Australia is committed to becoming a role model in providing sustainable solar technology services and enabling greater returns on investments made by customers. It aims to achieve this alongside promoting the ecological restoration of the Earth and facilitating the creation of a green planet for the future.

At LONGi Australia, we recognise that respecting the human rights of those affected by our business activities is important. We act in strict abidance with the business ethics of honesty, trustworthiness, integrity and self-discipline and implement the principles set out in the Code of Conduct which applies across the broader LONGi Green Energy Technology Co., Ltd group (LONGi Group) in our business dealings.

In accordance with the LONGi Group's Code of Conduct, we uphold a commitment to maintain respect for the basic human rights of all internal and external workers, including through:

- mandating a minimum age for employees;
- recognising employees' rights to freedom of association and joining trade unions;
- prohibiting child labour, prison labour, slavery and human trafficking;
- providing a commitment that we do not engage in or tolerate any form of modern slavery, forced labour or human trafficking;
- committing to ensuring that our use and sale of any goods does not contribute to any form of forced labour; and
- complying with applicable laws on wage, working hours and benefits.

Our structure

LONGi Australia is a company incorporated in Australia and our registered office is located at 17.02, 570 George Street, Sydney NSW, 2000.

LONGi Australia is a subsidiary of LONGi Solar Technology Co., LTD (**Parent Company**), headquartered in Xi'an, China. Our Parent Company and its subsidiaries conduct a diversified range of business activities across more than 150 countries and regions across the globe with respect to solar technology, including the supply and manufacture of mono-crystalline silicon products and associated research and development, production, sales and marketing activities.

LONGi Australia does not have any owned or controlled entities.

Our operations

The LONGi Group specialises in the research and development, production and sales of monocrystalline silicon products as well as the provision of PV solutions for various application purposes. Products are manufactured in production bases located in China, Vietnam and Malaysia, which are operated by other entities in the LONGi Group. Our '2021 Sustainability Report'¹ provides an outline of the operations and sustainability agenda across the LONGi Group.

LONGi Australia's operations comprise of the marketing and sale of solar panels for Australian projects and developments. LONGi Australia sources all of its solar panels from the LONGi Group. The physical products that LONGi Australia receives are managed through third party logistics providers, including through warehouses located in Sydney, Melbourne, Brisbane and Perth.

LONGi Australia's core operations, including our supply of products and services, are mainly targeted to Australia. We also supply some products to New Zealand.

As at 31 December 2022, we engaged 15 employees.

Our supply chain

As part of a vertically integrated group, we obtain our supply of solar panels and other monocrystalline materials from our Parent Company. We also work directly with a small number of suppliers who support us in operating our business. These suppliers are primarily located in Australia.

The main types of goods and services that we procure are monocrystalline silicon based solar panels and other goods and services in relation to our on-selling of those products, including:

- transportation and shipping services; and
- logistics services in connection with the import and export of materials.

We engage our suppliers on a long term and relatively stable basis. Our transportation service providers are engaged through formal contractual arrangements. When engaged, each transportation service provider enters into a Transportation Services Agreement and is required to carry out its services in accordance with the terms of that agreement. Our template Transportation Services Agreement includes a number of modern slavery related obligations including for service providers to:

- comply with LONGi Group policies relating to modern slavery;
- not engage in any conduct or omission which would amount to an offence involving modern slavery; and
- take reasonable steps to identify the risk of, and reduce or prevent the occurrence of, modern slavery within their operations or supply chains.

We also procure services from professional service providers including, for example, accountancy, audit and legal services.

As a result of the reliance on our Parent Company as our primary supplier of goods, we also have a number of indirect suppliers who provide materials required for the manufacturing processes undertaken by the broader LONGi Group.

The LONGi Group requires its suppliers to sign the LONGi Supplier Statement and CSR Code of Conduct (**Supplier Statement**), discussed further below.² Under the terms of the Supplier Statement, our Parent Company may conduct audits of suppliers and their affiliates to verify compliance with the CSR Code of Conduct.

Modern slavery risks

¹ <u>https://static.longi.com/2021_longi-sustainability-report-en.pdf</u>

² https://static.longi.com/20220610_CSR_1_0c4d1490d3.pdf

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Risk assessment methodology

We developed a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk. We applied the risk methodology to our key direct suppliers and also the key indirect suppliers engaged by our Parent Company to supply materials needed for product manufacturing.

Our initial risk assessment indicated that our operations and supply chain have medium potential for modern slavery risks. We also determined that our indirect suppliers present a medium risk of modern slavery, based on an assessment of the recognised risk measures and relationship between the LONGi Group and the supplier. We do not consider that our risk profile has changed in CY2022.

Our risk profile is summarised in the table below.

Risk profile

Risk	Description of risk	
Sector /Industry	The manufacture of renewable technologies forms part of the broader LONGi Group's operations. The procurement of materials used to manufacture renewable technology, including solar panels, is doubted or challenged to involve a risk of modern slavery. However, to a large extent, such risks are mitigated by LONGi Australia as we solely procure our renewable technology supplies through our Parent Company, who have processes in place to address this risk, including:	
	- Sustainable Development principles and practices;	
	 a Code of Business Conduct³ (LONGi COC); 	
	 a process for supplier selection and certification requirements; 	
	- a whistleblower mechanism; and	
	 annual audit processes for its important suppliers which cover technical, quality control and corporate social responsibility obligations. 	
Product / Service	The most significant modern slavery risks are present in our procurement and provision of solar technologies. As discussed above, this risk is largely at the manufacturing level and associated with the raw minerals used to produce these products further down the supply chain.	
	The risk is largely mitigated in LONGi Australia's operations given the direct procurement relationship with our Parent Company, who have a number of mechanisms in place to limit modern slavery risk. We understand that a number of the suppliers have signed the LONGi Group Supplier Statement, providing undertakings to not engage in a number of modern slavery related practices. We also have some visibility over these suppliers and understand that some of these services also require more specialised knowledge of employees, lowering the risk of employing base-level employees who are at a higher risk of being exposed to modern slavery.	
	A large portion of our supply expenditure is also on services that assist with the transport and provision of the technologies procured from our Parent Company. This includes maritime container transport services and other logistics services.	

³ <u>https://static.longi.com/_86a13b6839.pdf</u>

	LONGi Australia acknowledges that an inherent sector risk exists further down the supply chains of some companies who deliver these services.
	Another contributor to our supply expenditure are services required for LONGi Australia's operational function. These services present minimal risk, with many of our direct suppliers either being Australian based, having internal policies in place to address modern slavery risks and, in some cases, previously submitting Modern Slavery Statements for the purposes of the Modern Slavery Act.
	Many of our direct suppliers are Australian-based and, as such, present a minimal geographic risk.
Geographic	Most, if not all, of our broader indirect suppliers engaged by our Parent Company in the upstream manufacturing process (including our Parent Company itself) are located in China. China has been identified as a high risk country, especially within this industry. We acknowledge that this gives rise to an increased inherent geographic risk of engagement in modern slavery practices. This geographic risk is minimised in respect to some suppliers who are located within more developed and sophisticated areas of China, such as Shanghai, many of which are also large publicly listed companies. Many of the smaller indirect suppliers have made human rights related commitments in internal policies and regulate employee and contractor conditions more generally through executed labour contracts. This risk is also mitigated more generally as a result of the developed risk management processes and control measures applied by our Parent Company when engaging suppliers, including requiring that suppliers adhere to the LONGi Group Supplier Code of Conduct.
COVID 19 risks	We did not identify any additional risks in our operations and supply chains as a result of COVID-19.

Actions to assess and address risk

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery. We manage engagement with our employees in accordance with the open, fair and equal employment policy that applies across the broader LONGi Group. We also adopt the broader policy stances of the LONGi Group with respect to treatment of our employees and the employees of our suppliers (through the LONGi Group Supplier Code of Conduct), extending to:

- forbidding child labour and forced labour during production and services;
- not interfering with employees' freedom of religion;
- not tolerating any discrimination on employees' ethnic minority, race, nationality, religion, gender, age, disability or marital states;
- respecting employees' rights to free association and conducting collective negotiation; and
- insisting on equal pay for equal work among males and females.

We have also undertaken a number of specific steps to assess and address modern slavery in our operations and supply chains. This includes:

- imposing contractual obligations on suppliers (through the Supplier Statement) to take steps to reduce modern slavery including by obliging suppliers to require their suppliers to take certain compliance steps; and
- engaging with suppliers to address forced labour risks, including:
 - o direct dialogue with suppliers at the management level;
 - o work-level communication on compliance requirements;
 - o factory visits;

- o supplier reviews; and
- o compliance monitoring, through requests for information; and
- conducting training on forced labour risks for LONGi Group employees who interact with suppliers and execute supplier reviews.

CY2022 areas of focus

Our CY2021 modern slavery statement set out our key areas of focus for CY2022. The table below sets out our progress against a number of those areas, with further detail on these items also contained below. To the extent that work on certain areas of focus is ongoing, we will continue to progress relevant actions and initiatives in CY2023.

CY2022 area of focus	Progress
Rolling out our revised template transportation services agreement containing revised modern slavery provisions	Throughout CY2022, we utilised our updated template Transportation Services Agreement. As discussed above, this includes drafting specifically targeting modern slavery compliance provisions.
Rolling out our targeted modern slavery training programs to LONGi Australia employees	During CY2022, modern slavery awareness and compliance training was delivered only to the directors of LONGi Australia. See further below.
Progressing the development of more robust self-assessment tools for monitoring the effectiveness of the steps we have taken to address modern slavery risks	LONGi Group has obtained the certifications of ISO26000 (Social Responsibility), and ISO37301 (Compliance Management Systems) to assist in the assessment of modern slavery risks.
Continuing to conduct due diligence on suppliers to identify modern slavery risks	LONGi Australia undertakes due diligence on all of its suppliers to identify risks of modern slavery within our operations and supply chains.
	By signing the Supplier Statement, LONGi's suppliers agree to:
	 provide, on a regular or irregular basis, written self- evaluation forms, accompanied by a written report with supporting information and data on actions taken or to be taken by the company to ensure compliance with the Supplier Statement;
	 cooperate fully with annual due diligence carried out by LONGi including the fulfilment of corporate social responsibility according to LONGi's requirements and implement due diligence on the fulfillment of corporate social responsibility of the company's suppliers; and
	 allow LONGi or a third party to conduct an audit of the company at its premises to verify compliance with the Supplier Statement and CSR Code of Conduct.
Further developing and establishing our CSR compliance management system	During CY2022, the LONGi Group expanded its compliance department to ensure that compliance tasks (including risk assessment in relation to modern slavery) are carried out effectively and efficiently.
Finalising our modern slavery policy for adoption and implementation	During CY2022, the LONGi Group focused its efforts on updating and publishing the new LONGi COC, released in July 2022 and applied to LONGi Australia.

Due diligence

As noted above, we undertook an initial risk assessment to identify any key modern slavery risks that existed within our operations and supply chains.

When selecting new suppliers, the approach of the LONGi Group and its subsidiaries (including LONGi Australia) is to also conduct due diligence and a 'negative list' screening on all potential suppliers and score potential suppliers based on a comprehensive evaluation. If we consider it necessary or suspect that any supplier is not in compliance with the requirements, then an audit may be carried out at any time.

Governance and accountability framework

LONGi Australia has a set of values that recognises our responsibilities to all stakeholders. These values are largely set out in the LONGi Group's Code of Conduct, which is the overarching mechanism governing the corporate behaviour of all entities in the LONGi Group. Staff of LONGi Australia are responsible for upholding these values and acting in accordance with them when engaging in business on behalf of LONGi Australia.

In our CY2021 modern slavery statement, we noted our compliance department's plans to develop a corporate social responsibility (CSR) compliance management system, which would be established to apply worldwide and at all levels of the organisation. During CY2022, as a result of the implementation of this system, LONGi Group obtained ISO26000 (Social responsibility) and ISO37301 (Compliance management systems) certification.

Driven by our commitment to the planet and human, we stand with the solar industry in supporting the human rights of all workers. It is evident through our LONGi Group Code of Conduct and ethical values that we do not engage in or tolerate any form of forced labour, modern slavery or human trafficking.

At a LONGi Group level, our legal, compliance, purchase and supplier management and human resource departments are actively involved in ensuring our compliance with all applicable laws and regulations in relation to forced labour or modern slavery.

LONGi Australia shows zero tolerance for forced labour and modern slavery.

We have developed a plan for enhancing our modern slavery governance and accountability framework, including through reviewing our company policies to ensure that modern slavery considerations are appropriately captured and establishing our CSR compliance management system.

Policies and procedures

We operate with reference to the LONGi Group's policies and procedures regarding risk management, including the Internal Audit Management Measures, Supervision Management System, Internal Control Management System and Internal Control and Self-evaluation of Internal Control System. These procedures provide frameworks for managing risks in our operations, including through the use of control measures.

During CY2021 we continued the process of reviewing a number of our existing policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks. During CY2022, the LONGi COC was reviewed, updated and published. The LONGi COC:

- reinforces the LONGi Group's commitment to the principles of compliance with law, regulations and business ethics, honesty and integrity, reliability, value-added and fulfillment and behavioural safeguards; and
- highlights the LONGi Group's commitment as a member of the United Nations Global Compact.

The LONGi Group requests that all new suppliers sign the Supplier Statement. The Supplier Statement seeks to ensure that our suppliers are committed to:

- compliance with the CSR Code of Conduct;
- cooperating with the LONGi Group in undertaking due diligence and auditing related to corporate social responsibility;
- providing products (including raw materials in products) that contain ethically sourced and manufactured components; and

- enquiring reasonably of the origin of products, and establishing supply chain communication processes.

The CSR Code of Conduct. which forms part of the Supplier Statement, includes a focus on responsible supply chains and seeks to ensure that suppliers:

- do not employ children, pay fair wages to employees, not engage in or tolerate any form of violations of labour laws or regulations and recognise their employees rights to freedom of assembly and association; and
- use reasonable efforts to make sure their suppliers address social and environmental risks in their supply chains and actively fulfil their social responsibilities and continuously improve their CSR management level.

Training

During CY2022, modern Slavery awareness and compliance training was delivered to the directors of LONGi Australia. This training is intended to raise awareness of modern slavery risks and where they may arise in our business including with respect to:

- how to identify modern slavery risks;
- how to exercise leverage;
- the requirements of modern slavery legislation more generally; and
- recent developments in the modern slavery space.

This training is also intended to make reference to a number of case studies and provide examples of practical issues which may arise, to assist to identify and assess modern slavery risks on a more practical level.

COVID-19

The COVID-19 pandemic has brought further challenges to modern slavery and highlighted social and economic inequalities worldwide. The LONGi Group has ensured that its own operations, and those of its suppliers, through the Supplier Code of Conduct, continue to comply with required employment standards.

Other

The requirements of conflict-free minerals are included in the Supplier Statement. The Supplier Statement sits alongside a number of other mechanisms used to assess and regulate risks in service procurement across the operations of the broader LONGi Group and has been the subject of continuing review. As discussed above, LONGi Australia requires its suppliers to comply with this policy throughout the lifetime of their engagement. The LONGi Group, more broadly, has also remained committed to adopting measures in the future to manage mineral supply and encourage the use of conflict-free minerals.

In CY2022 we engaged external consultancy services to assist us to better understand our modern slavery obligations, the risks of modern slavery practices which arise in our business portfolio and to refine and develop materials to better identify, assess and address these risks moving forward.

Assessing our effectiveness

We are committed to reviewing the effectiveness of our actions with respect to managing modern slavery risks in our operations and supply chains and have maintained a focus on our broader CSR compliance since 2020. We are committed to:

- regularly reviewing our modern slavery processes;
- assessing whether our existing risk management processes are appropriate each time that a new operation is commenced or a new supplier is engaged;

- working across all departments within our company (legal, compliance, purchase and supplier management and human resources) to address the risks of modern slavery and ensure compliance with modern slavery laws; and
- considering reports of concerns about modern slavery in our business from employees, business partners and suppliers.

We also adopt the LONGi Group's audit processes, which assist us to evaluate the effectiveness of the modern slavery risk assessments that we undertake in respect of our suppliers. As part of this, we obtain the benefit of LONGi Group's annual audits of important suppliers and supplier performance evaluations where it is deemed necessary. Specific audits of some of the LONGi Group's factories and suppliers were also undertaken in CY2022, to assess their conduct against the LONGi Group's CSR related standard.

Consultation

Given that LONGi Australia does not have any owned or controlled entities, there is no requirement of consultation under this section. However, we have explained below the process by which this statement was developed within the LONGi Group.

As a subsidiary of Parent Company, LONGi Australia's approach to modern slavery is largely comprised of overarching policies, systems and processes that are designed to be consistently applied across the LONGi Group.

Prior to being put to the Board of LONGi Australia for review and approval, this statement was reviewed by the Managing Director of LONGi Australia, the Human Resources Business Partner of LONGi Australia, the Business Continuity Management Group and legal department.

CY2023 focus

In CY2023, our areas of focus are anticipated to be:

- inserting revised modern slavery clauses into more of our contracts with our suppliers and contractors;
- finalising a modern slavery policy for adoption and implementation;
- conducting due diligence on upstream suppliers of key production bases;
- rolling out targeted modern slavery training programs to all LONGi Australia employees;
- further expanding our commitment to corporate social accountability, including through obtaining SA8000 (social accountability) certification for LONGi Group manufacturing facilities which provides a framework for organisations of all types, in any industry, and in any country to conduct business in a way that is fair and decent for workers and to demonstrate their adherence to the highest social standards.

This statement was approved by the Board of Directors of LONGi Australia, in their capacity as principal governing body of LONGi Australia on 26 June 2023.

This statement was signed by Desheng Lin in his capacity as Managing Director and board member of LONGi Australia.

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Desheng Lin Managing Director LONGi Solar Australia Pty Ltd