

Modern Slavery Statement

Nextracker Inc. ("Nextracker," "we," or "us") is pleased to present our modern slavery statement for the reporting period of April 1, 2020 to March 31, 2021 (the "Statement"). This reporting period has been marked by unprecedented events and changes that have touched every person and industry. Nextracker has weathered this difficult time, and this is a testament to our company, our culture, and our people working together to make a difference during these challenging times.

In this reporting period, as part of our continuous improvement approach in all operational areas, we have implemented and disseminated a broad range of updates to our policies and codes in our ongoing efforts to educate our people on our commitment to social equity and further embed these values in our culture. We continue to update and improve our supplier screening process and our supplier contracts to help improve our monitoring and enforcement of supplier compliance with our updated policies and codes. As we have done previously, we have also engaged external consultants and technology providers to help us regularly map and assess our comprehensive supply chain in a manner that will help drive current and future due diligence and remediation actions.

The pandemic has often challenged our capacity to detect and mitigate forced labor in our supply chain (e.g., onsite audits are more difficult to do in a pandemic), but despite those added obstacles, we remain committed to our ongoing efforts to detect, reduce, and hopefully eliminate forced labor in our industry. While maintaining constant vigilance over this constantly changing dynamic, we are confident that our modern slavery prevention strategies and our people will continue to transform the company in positive ways and achieve better outcomes for all stakeholders.

This Statement has been prepared on a consolidated basis and has been approved by the executive leadership team (as the principal governing body) of Nextracker Inc. and by the Board of Directors of Nextracker Australia Pty Ltd (ACN 610531345), in each case on behalf of its controlled entities pursuant to Section 5(1) of the *Modern Slavery Act 2018* (Cth).



Dan Shugar

CEO of Nextracker Inc.

Responsible Member of Reporting Entity



Peter Davis Wheale

Director of Nextracker Australia Pty Ltd ACN 610 531 345

HEADING IN STATEMENT	ACTIONS UNDERTAKEN OR COMMENCED	CRITERIA ASSESSED
Entities and Structure	<ul style="list-style-type: none"> Identified reporting entities Described Nextracker's structure, operations, and supply chains 	1 and 2
Policies and Protocols	<ul style="list-style-type: none"> Revised Responsible Procurement Principles (RPP) to align with Responsible Business Alliance (RBA) Code of Conduct and instituted Responsible Procurement Program Issued Supplier RPP Acknowledgment Form to suppliers and commenced supplier RPP training 	3 and 4
Remediation	<ul style="list-style-type: none"> Use of Ethics Hotline for stakeholders to report any breaches of our Code of Business Conduct and Ethics Conducted annual risk reports of suppliers and instituted external Corporate Social Responsibility ("CSR") audits 	3 and 4
Training and Education	<ul style="list-style-type: none"> Mandatory training of employees on our RPP and our policies relating to modern slavery more broadly Tailored future training regarding modern slavery to members of executive group 	3 and 4
COVID-19	<ul style="list-style-type: none"> Instituted effective work-from-home measures to ensure operational continuity Initiated voluntary Return to Work plan while ensuring employee safety and welfare 	3, 4, and 7
Assessing Efficacy	<ul style="list-style-type: none"> Established ongoing annual risk assessments and reports of our suppliers Established ongoing review process of key modern slavery metrics 	5
Collaborative Efforts	<ul style="list-style-type: none"> Engaged with business units and entities within the corporate group structure to create a unified approach to modern slavery Engaged with industry bodies such as the Solar Energy Industries Association and partnered with national and global organizations to ensure industry-wide commitment 	6

1. Reporting Entity and Company Overview

NextTracker has been the global market-share leader in the solar tracker industry for five years and counting, according to global research firms, WoodMackenzie and IHS Markit. We have delivered or fulfilled close to 50 GW of smart solar trackers for projects on five continents, including some of the largest solar farms in the world. Our TrueCapture and NX Navigator smart-monitoring and control-software platforms have revolutionized tracker performance and represent our commitment to continuous innovation.

Solar industry veteran, Dan Shugar, and his team founded NextTracker because no solar trackers met their requirements, so they redesigned, engineered, and built an innovative system from the ground up. From the company's earliest days, we've brought together some of the best minds in the business, and our people collectively represent hundreds of years of PV and solar tracker experience. Team members come from backgrounds in manufacturing, logistics, development, finance, engineering, construction, and asset management, while our deep talent bench also features experienced interdisciplinary professionals from software, power electronics, motion control, and other technical industries.

NextTracker conducts business in Australia through its direct subsidiary, NextTracker Australia Pty Ltd ACN 610531345 ("NextTracker Australia"). NextTracker Australia is a controlled entity of NextTracker and is a "reporting entity" under Section 5 of the *Modern Slavery Act 2018* (Cth) (the "Act"). NextTracker is not required by law to comply with the Act. However, due to our commitment to mitigate modern slavery, NextTracker chose to voluntarily comply with the requirements imposed by the Act and submit this Statement jointly with NextTracker Australia and on a consolidated basis on behalf of its controlled entities.

2. NextTracker Structure, Operations, and Supply Chain

ENTITY	COUNTRY OF INCORPORATION	STATUS UNDER THE ACT
Parent Entity - NextTracker Inc.	United States	Voluntary reporting entity
➤ NextTracker Australia Pty Ltd.	Australia	Reporting entity
➤ NextTracker India Private Limited	India	Controlled entity
➤ NextTracker International Holdings LLC	United States	Controlled entity
○ NextTracker Mexico S.de R.L. de C.V.	Mexico	Controlled entity
➤ NextTracker Spain SL.	Spain	Controlled entity
➤ NextTracker Saudi Arabia Ltd.	Saudi Arabia	Controlled entity
➤ NextTracker Chile SpA	Chile	Controlled entity
➤ NextTracker Newco China Ltd.	China	Controlled entity

Structure

NextTracker is headquartered in Fremont, California (USA) and has a global network of offices, with locations in Australia, Chile, China, India, Mexico, Saudi Arabia, Spain, and multiple locations in the United States. Founded in 2013, we've operated since 2015 as an independent subsidiary of Flextronics International Ltd. (Flex). Our Flex parent is a \$26 billion company with more than 200,000 employees worldwide, offering a strong balance sheet and a worldwide supply chain and distribution network. With Flex's 100 manufacturing sites in 30 countries, NextTracker delivers unparalleled scalability, reliability, and bankability.

Operations

NextTracker has an international presence and conducts operations in Australia through its direct subsidiary, NextTracker Australia. Within Australia, NextTracker Australia has a market share of around 56% of the solar tracker market. With several projects spanning across Australia, most notably in solar plant projects and renewable energy farms located in Western Australia, New South Wales, and South Australia, NextTracker Australia maintains a strong

presence in the Australian market.

The execution of these often complex projects requires significant expertise, and as such, Nextracker employs 520 workers globally, with 25-30 across Australia and Southeast Asia working in specialized and sophisticated roles for Nextracker Australia. The legal framework provided by the Australian Government and their ongoing commitment to labor rights and modern slavery ensures that Nextracker Australia's risk of modern slavery within our operations is comparatively low to the rest of our market peers.

Function	Full-Time	Temporary
<i>Key Management Personnel</i>	10	0
<i>General Managers</i>	3	0
<i>Senior Managers</i>	51	1
<i>Other Managers</i>	105	0
<i>Professional</i>	66	3
<i>Technical and Trades</i>	61	37
<i>Clerical and Administrative</i>	143	4
<i>Sales</i>	32	2
<i>Laborers</i>	0	0
<i>Apprentices or Interns</i>	0	2
Total	471	49

Nextracker's employees are required to comply with our collection of policies including a Diversity and Inclusion Policy and our Code of Business Conduct and Ethics, which ensure an ongoing commitment to principles, standards, and responsibilities that help guide our behavior and decision making. The policies help prevent unethical behavior, mandate compliance with the legal framework of the jurisdictions in which we work, and set key compliance areas for our employees.

Our HR department also maintains significant standards of quality in their operations and is responsible for the hiring and onboarding of employees in an ethical manner and ensuring compliance with Australian laws, including our policies to mitigate any potential risk of modern slavery occurring in our operations.

3. Modern Slavery Risks in Nextracker Operations and Supply Chain

Modern slavery occurs in many forms such as forced labor, child labor, domestic servitude, human and sex trafficking, and workplace abuse. Therefore, in the interests of brevity, throughout this Statement we will use the phrase, "modern slavery," to encompass these various forms of forced or coerced labor. Nextracker's supply chain spans a broad number of industries and geographies, and in order to identify, understand, and mitigate any aspect of modern slavery risk within it, we undertook a mapping exercise of our "comprehensive" supply chain, including suppliers beyond our direct contacts and down to the tenth tier. Nextracker has previously conducted supply-chain mapping using other trusted consultants and third-party service providers, but until recently, mapping to several tiers beyond the suppliers with whom Nextracker has contractual relations was not particularly reliable or even feasible with most available supply-chain mapping software applications.

For this more advanced and comprehensive supply-chain mapping, as a first step, we categorized all our purchases for goods and services over the reporting period by supplier, industry, and geography. A total of 418 first-tier suppliers were identified with the vast majority of our first-tier suppliers located in the USA. The geographic risk posed by these suppliers is relatively low with the USA ranking high in terms of government response according to the Global Slavery Index. However, we also identified other key suppliers located in China, India, Mexico, Saudi Arabia, Thailand, and Portugal. Nextracker is conscious of the heightened risk of modern slavery occurring in these regions and took a proactive approach in advance of the comprehensive mapping exercise to mitigate the modern slavery risk of these suppliers. By instituting a number of supplier contract reforms as outlined further in the following sections, we expanded our ability to perform due diligence and monitor supplier compliance with our policies and also established improved mechanisms to remedy non-compliance.

Notwithstanding the foregoing paragraph, Nextracker understands that assessment of a supplier by geography alone is a blunt instrument that does not accurately assess the modern slavery risk associated with a supplier. Analysis of the industries in which suppliers in a particular geography operate are key to obtaining a more specific understanding of a supplier's true risk profile. Accordingly, Nextracker provided this categorized "spend data" to an

external technology provider, FairSupply. Using multi-regional input-output tables and a proprietary algorithm, FairSupply used the spend data to map the supply chain of the industries and countries into which our funds flow. FairSupply then applied a modern slavery footprint to produce a theoretical modern slavery risk metric associated with the amount spent at each tier, industry, and country out to the tenth tier.

The combination of our categorization and this mapping and assessment of our suppliers' slavery footprint will add another tool to our arsenal and help us undertake a more tailored and robust rectification method by targeting key areas of concern. The assessment indicated some potentially high-risk areas of modern slavery within several industries we source from, specifically, electrical equipment and appliances, metal, and other forms of basic materials supply. Due to the nature of such industries that involve the process of mining, refining, and processing minerals in geographies with significant amounts of unskilled labor input, the risk profile of suppliers in these industries is elevated. While the mapping exercise indicates only a theoretical number or estimate of modern slavery risk within our supply chain, Nextracker is committed to undertaking consistent efforts to reduce this estimate on a continuous basis.

Our assessment highlighted that the majority of our modern slavery risk is concentrated within the first three tiers of our supply chain. As opposed to other industries and companies wherein modern slavery risk would occur further down the comprehensive supply chain, this presents an opportunity for Nextracker to leverage the significant amounts we spend with those material suppliers and exert greater influence on actions taken by these suppliers specific to modern slavery risks identified in their second and third tiers. We plan to subject potential suppliers within the industries and geographies identified as having an elevated level of risk to a more rigorous level of diligence, training, and compliance checks.

In addition, to better tailor our response and ongoing actions to mitigate the risk of modern slavery within our supply chain, Nextracker also initiated an in-depth analysis of key industries, suppliers, and geographies that have presented an elevated level of modern slavery risk. The analysis will provide valuable insights into the main sources of risk within our comprehensive supply chain and will facilitate ongoing due diligence as well as direct engagement with key stakeholders to enact more direct change.

4. Actions Taken to Address Risks

Operations

In order to fulfill our commitment to mitigating modern slavery risk in our operations and supply chains, Nextracker has implemented a number of actions to ensure the wellbeing and welfare of our workforce and those of our suppliers throughout our comprehensive supply chain. As part of this effort, Nextracker has implemented a suite of policies and codes consisting of revisions to pre-existing documentation as well as instituting new policies to disseminate our values and our commitment to internationally recognized conventions.

Code of Business Conduct and Ethics (“Code”)

As an independent subsidiary of Flex, we apply and comply with a number of Flex codes and policies with broad application to our efforts to mitigate our modern slavery risk, including the Labor and Human Rights Policy (hereinafter, the “LHRP”) and the Code of Business Conduct and Ethics (hereinafter, the “Code”). Every Nextracker employee must know, understand, and follow the Code as well as the referenced procedures and related policies. We rely on the Code when we work collaboratively, interact with customers, collaborate with business partners, and contribute to our communities. Accordingly, Nextracker has firmly embedded the foundational principles of the Code in our Responsible Procurement Principles (hereinafter, the “RPP”).

Nextracker has established and continues to improve upon an integrated approach to managing human rights across our business including evaluating the risks related to modern slavery and implementing comprehensive policies that reinforce our company ethics and a commitment to our zero-tolerance policy towards modern slavery. While the Code governs other areas of Nextracker's business behavior, how it influences and drives Nextracker's policies covering modern slavery can be briefly summarized in the following bulleted list:

- We forbid discrimination against anyone on the basis of race, color, gender, age, national origin, religion, or any other legally protected characteristic.
- We strive to maintain a workplace where workers are free from all forms of harassment or abuse.
- We provide fair and safe employment opportunities compliant with local laws and regulations.
- We do not use child, forced, indentured, or bonded labor, and maintain a minimum-age work requirement.
- We value honesty and integrity and believe in respecting our workers.
- We recognize the rights of our staff to freely associate and believe that communication and direct engagement between workers and management is the best way to resolve workplace issues.
- We forbid retaliation against anyone who raises a concern about discrimination, harassment, or any labor and employment practice.
- We expect all business partners to meet these same standards.

Labor and Human Rights Policy (“LHRP”)

The LHRP is deliberately structured and drafted to align with the United Nations (the “U.N.”) Guiding Principles on Business and Human Rights. The LHRP extends to Nextracker’s subsidiaries, affiliates, all employees worldwide, its entire supply chain, and includes a reporting and escalation process for suspected issues. These principles are reinforced by Nextracker’s commitment to the U.N. Global Compact, which supports respect for and recognizes international human rights as well as the elimination of all forms of coerced labor.

Suppliers

Nextracker’s expectations of suppliers regarding the mitigation of modern slavery risk are set out in our RPP, the Supplier RPP Acknowledgment Form, and the LHRP. These policies help Nextracker and our suppliers understand our ongoing commitment to identifying and mitigating modern slavery and ensuring the welfare and ethical treatment of workers. The policies underpin our onboarding process and our annual risk assessments to maintain confidence in our suppliers and the steps they are taking to ensure greater outcomes for their workforce.

Nextracker’s Responsible Procurement Principles (RPP)

Nextracker uses regular processes and protocols to verify, evaluate, and address risks of modern slavery in our supply chain. Nextracker sets clear expectations for our suppliers with the vast majority of our supplier contracts and purchase order terms containing language requiring suppliers to comply with these provisions and labor practices as well as complying with all applicable laws in the country or countries in which they do business. The RPP establishes Nextracker’s expectations for our suppliers regarding their compliance with internationally recognized standards on freely chosen employment, younger workers, working hours, wages, benefits, humane treatment, non-discrimination, and freedom of association. The RPP requires our suppliers to comply with our high standard of labor rights and ensures their values align with ours in respect of modern slavery and greater social outcomes as a whole.

To address compliance-related issues, we have fully aligned the RPP with the Responsible Business Alliance (“RBA”) Code of Conduct. There is unambiguous guidance and direction provided to alert existing and prospective suppliers of what labor practices are forbidden as well as suggestions and best practices for suppliers to follow. In addition, Nextracker requires all suppliers to sign our Supplier RPP Acknowledgment Form declaring their current and future compliance with the RPP. In order to foster better RPP adoption, we train our new and existing suppliers on our RPP. These RPP trainings help us increase capacity with certain suppliers and keep us more engaged with them for RPP-related compliance issues. In the near future, Nextracker’s supply-chain data for social and environmental compliance is planned to be disclosed in our regular sustainability reports.

Audits of Supply-Chain Entities and Internal Operations

Nextracker remains committed to implementing the RBA’s Code of Conduct across our supply chain and that includes supplier self-assessment questionnaires. With a revised process that is set to begin by the end of 2021, Nextracker will be able to augment its current risk assessments (“RA”) of modern slavery risk within its supply chain by using the questionnaire responses as well as our own due diligence and audits. The risk assessments will form the basis of ongoing audits from our internal auditors and will cover a number of elements within our supply chain.

We have started onboarding new suppliers and managing existing suppliers with updated mandatory obligations

and standards, including:

- Prospective and existing suppliers who fail to demonstrate a clear commitment to internationally recognized labor and human rights (e.g., freely chosen employment) will not be allowed to be or continue as Nextracker suppliers.
- Both existing and new suppliers will undergo annual RA's with:
 - New suppliers required to provide a recent Corporate Social Responsibility ("CSR") onsite audit report; and
 - Existing suppliers, based on the results of the RA, required to undergo an external-party CSR audit covering standard CSR topics, including modern slavery.
- Measures to combat modern slavery in high-risk areas require our suppliers to perform audits of labor providers, security guards, cleaning entities, and canteen services those suppliers use, as Nextracker understands that indirect services often pose heightened risks of forced labor.

Suppliers who present risks of modern slavery are immediately required to present remediation plans that are closely monitored. Failure to complete those plans and substantially mitigate the risk shall result in termination of the supplier relationship. If deficiencies are found during an audit, Nextracker will formally request the supplier to develop and submit a corrective-action plan ("CAP"). Suppliers must correct and improve their areas of deficiency within 90 days of the audit. The CAP will outline how the supplier will resolve the issue(s) following an 8D problem-solving methodology, addressing containment, root-cause analysis, correction, preventive action, as well as assignment of action owners and a timeline for completion. If forced labor is detected, per the RBA methodology, it is considered a "priority finding," which will require the supplier to conduct an onsite, priority-issue closure-audit. Nextracker monitors, reviews, and reports on compliance with these requirements using a corrective-action tracker to initiate the request, track response times, and report on response status and outstanding supplier deficiencies.

Grievance Policy and Whistleblower or Ethics Hotline

With use of our Ethics Hotline, Nextracker stakeholders can report potential violations of the Code concerning modern slavery and other ethical issues. Globally, Nextracker ensures that all employees, suppliers, customers, investors, and other stakeholders have access to the anonymous toll-free hotline to facilitate reporting of suspected violations of the Code. To enhance accessibility, the Ethics Hotline is available 24-7 and in multiple languages. Employees can make reports online too.

The Ethics Hotline facilitates the effective detection, investigation, and management of ethical problems. All reports are treated seriously and thoroughly investigated through an internal audit with the support of compliance subject matter experts and the legal departments of Flex and Nextracker as required. With this reporting system, Nextracker can take steps to prevent modern slavery risks from arising in the future.

Training

Nextracker provides mandatory training to all its employees on the Code. Every employee of our organization must know, understand, and follow the Code and its referenced procedures and policies.

For suppliers, they are trained how to comply with the RPP upon their onboarding and annually to refresh their understanding of the RPP and to address any changes from previously provided versions. In addition, Nextracker disseminates the LHRP and provides training on it to our employees, agency workers, contractors, customers, suppliers, and other stakeholders.

In the near future, Nextracker plans to have key members of our executive team receive tailored training from modern slavery specialists and technology providers relating to general modern slavery risk and Nextracker's specific modern slavery risk profile to communicate and stress how modern slavery can affect our operations and supply chains.

5. How Risk Assessment Actions and Policies are Audited for Efficacy

To ensure our own compliance and encourage continuous improvement, we undergo regular audits from third

parties to identify any gaps in our own regulatory programs and to learn about and implement new best practices developed within the solar industry as well as other business areas. Nextracker will also continue to conduct our supply-chain mapping exercises and use the relevant metrics derived from our most recent exercise to conduct year-to-year analyses of key performance indicators of our modern slavery risk, monitor our performance, and inform our ongoing actions.

The combination of the foregoing methods allows Nextracker to accurately assess the efficacy of its actions with both qualitative and quantitative data derived from audits and regular due diligence. The data will be used to drive ongoing refinements to our modern slavery prevention strategy.

6. Consultation with Nextracker Subsidiaries and External Bodies

Nextracker is part of a corporate group spanning the world. As such, Nextracker engaged with internal and external entities globally and within Australia to ensure a unified and consistent approach to mitigating modern slavery risk within our operations and our supply chain. Nextracker engaged in discourse between business units and entities across the world with members of the executive committee and the legal department liaising with individuals across the group to understand the potential risks that Nextracker incurs throughout our business. This extensive consultation process engendered a more robust and holistic approach that we undertook and will influence our ongoing actions for future reporting periods. Consistent with our continuous improvement philosophy, this ongoing consultation process was instrumental in influencing the changes we made to our governance documents and this Statement's publication.

In order to be ethical partners and enrich the communities we operate in, we extended our consultation process beyond our corporate group to external partners and industry bodies and did the following:

- Joined the Solar Energy Industries Association (SEIA) with more than 175 solar companies to:
 - Sign the Solar Industry Forced Labor Prevention Pledge; and
 - Embrace our commitment to the industry effort to oppose forced labor in our supply chain.
- Undertook the development of the solar workforce, and through our renowned PowerworX Academy and with partners around the world, we train the solar workforce of tomorrow, today.
- In addition to our internal programs, Nextracker partners with like-minded national and global organizations to promote diversity and social equity, such as:
 - Renewables Forward;
 - Clean Energy Leadership Institute (CELI);
 - GRID Alternatives;
 - Little Sun;
 - Navajo Nation;
 - Vote Solar;
 - WRISE;
 - The Hidden Genius Project; and
 - Women in Cleantech and Sustainability (WCS).

We are committed to diversity, equity, and inclusion. Nextracker knows that these are key drivers of success for any organization and which are also instrumental in detecting and mitigating modern slavery.

7. Additional Relevant Information

Nextracker plans to develop an audit committee that will be chartered by its future board of directors to oversee the company's various compliance programs. A chief ethics and compliance officer ("CECO"), or a similar role, will report quarterly to the audit committee on the status of the compliance programs. The CECO will also report quarterly to executive sponsors, which will likely be a group of Nextracker executives who provide feedback and support on the scope and content of the compliance functions and ensure its implementation. In addition, the compliance program will be supported by members of a compliance council, which will be a cross-functional team of subject matter experts in the various compliance areas. The compliance council will help drive Nextracker's

culture of compliance in our company across the globe. The council will likely consist of the CECO, regional compliance attorneys, compliance directors, a corporate compliance team, and other relevant stakeholders from business segments and functional areas within the company. The council will meet regularly to share best practices, learn from internal and outside speakers, highlight key policy, legal, and regulatory changes, and share key accomplishments and future goals.

COVID-19

The COVID-19 pandemic has significantly changed the way in which most businesses conduct their operations and has limited the ability to maintain direct connections with suppliers, employees, and stakeholders as a whole. In response to the pandemic, Nextracker undertook the following steps to ensure our ongoing commitment to mitigating modern slavery and ensuring our employee's welfare:

- Nextracker shifted its staff to work from home, attempting to ensure ongoing continuity of our operations and ensuring the safety of our staff;
- Nextracker has since started our *Return to Work* program that allows employees to voluntarily return to the office while ensuring the safety of our staff; and
- Our response to COVID-19 has allowed Nextracker to continue operations and retain staff without exposing our employees to risky labor practices.

Regarding our supply chains, the effects that the pandemic has had on logistics, shipping, and the global supply chain in general has been an incredible challenge that has required substantial amounts of effort and the exhaustion of all possible contingency plans and options by Nextracker and its suppliers. Because there was and continues to be numerous barriers and difficulties in executing normal supply chain operations, Nextracker has occasionally employed ethically alternative approaches to satisfy existing customer obligations while simultaneously managing significant equipment and materials shortages or delays. It is difficult to fully quantify or qualify what impact this may have had and continues to have with respect to modern slavery risk, but it hasn't changed Nextracker's attention and sensitivity to modern slavery risk in our supply chain. Nextracker will continue to apply its current methods, practices, and policies to detect, mitigate, and prevent modern slavery while seeking to continuously improve in these areas, particularly in light of the continued challenges that the pandemic currently imposes.