

Trina Solar (Australia) Pty Ltd

2024 Modern Slavery Statement

www.trinasolar.com/au

Introduction

Trina Solar (Australia) Pty Ltd (ACN 150 695 524) (hereinafter referred to as "Trinasolar Australia") is a subsidiary of Trina Solar Co., Ltd., a publicly listed Chinese company founded in 1997 (stock code: 688599.SH). Together with their global affiliates, these entities will be collectively referred to herein as "Trinasolar" or "Trinasolar Group".

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

For the financial year ending on 31 December 2024, Trinasolar Australia reported revenues exceeding one hundred million Australian dollars, surpassing the threshold established by the Modern Slavery Act 2018 (Cth) (hereinafter referred to as the "Act") and, as such, is classified as a reporting entity pursuant to the Act.

According to the Act, "modern slavery" encompasses the following categories:

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

This statement outlines the areas of risk identified by Trinasolar, the initiatives undertaken to mitigate these risks, and the measures employed to assess the effectiveness of these efforts in eliminating the risk of modern slavery within its operations and supply chain.

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

About Trina Solar (Australia) Pty Ltd

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

Trinasolar Group is mainly engaged in the following sectors:

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

Trinasolar Group is committed to pioneering smart solar energy solutions aimed at achieving a net-zero future. Through constant innovation, Trinasolar Group continues to push the PV industry forward by creating greater grid parity of PV power and promoting the adoption of renewable energy. Trinasolar Group is consistently recognised as a top-tier PV module manufacturer globally. In addition, Trinasolar Group's downstream business includes solar PV project development, financing, design, construction, operations, management and comprehensive system integration solutions for customers.

Trinasolar Australia employs sixteen (16) full-time employees ranging from sales personnel and solar engineers to finance experts and support staff. On a global scale, Trinasolar Group has nearly thirty thousand (30,000) employees. Trinasolar Group's module shipments rank in the top four within the industry. In 2024, Trinasolar Group shipped over 70GW in PV modules and 7.3GW in trackers. Trinasolar has successfully shipped more than 10 GWh in battery

energy storage products across China, Europe, the Middle East, Asia Pacific and North America, showcasing its global reach and impact. Trinasolar Group has established regional headquarters in Zurich (Switzerland), Silicon Valley and Miami (USA), Singapore, and Dubai (UAE), offices or branches in Madrid, Mexico, Sydney, Rome, etc., as well as manufacturing bases in Indonesia and the UAE, exploring a new model for glocalisation and promoting localisation operation for American cooperative base, with operations in more than 180 countries around the world.

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

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

- Code of Business Conduct and Ethics for Trinasolar's Employees;
- Trinasolar ESG Management Policy;
- Trinasolar Global Human Rights Principles;
- Employee Handbook;
- Anti-bribery Compliance Management Policy;
- Trinasolar Supply Chain Due Diligence Manual; and
- Corporate Social Responsibility Code of Conduct of Trinasolar Supplier.

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

Trinasolar's Supply Chain

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

- · Raw materials;
- Auxiliary materials;
- Infrastructure;
- Equipment;
- · Accessories;
- · Packaging;
- · Logistics;
- Transportation;
- Labour protection supplies;
- · Office supplies; and
- Third-party certification services.

Trinasolar's suppliers, primarily located in China and the United States, are centrally managed by Trinasolar Group's procurement department in China. To mitigate and eliminate any supply chain risks, Trinasolar has developed and implemented the Trinasolar Supply Chain Due Diligence System, which incorporates comprehensive policies including Supply Chain Due Diligence Manual and Conflict Minerals Management Measures. Trinasolar integrated ESG factors into key steps throughout supplier management. Environmental and occupational health and safety related certificates (i.e. ISO 14001, ISO 45001 and ISO 50001) or equivalent management systems are mandatory during primary risk assessments of potential suppliers. Suppliers are required to sign and comply with Trinasolar's Supplier Corporate Social Responsibility Code of Conduct, the Supplier ESG Commitment, the Commitment Letter on Lawful Employment and the Commitment on Non-Use of Conflict Minerals at the onboarding stage.

Due Diligence is conducted on key suppliers using a checklist designed and authorised by TÜV SÜD. Any non-conformities identified during due diligence are tracked until rectified. The suppliers are also contractually obligated to cascade all environmental and human rights requirements to their upstream suppliers.

In 2024, Trinasolar delivered ESG-related training to over 98% of its core suppliers.

Trinasolar Group owns and operates manufacturing production plants in the Chinese cities of Changzhou, Suqian, Yiwu, Yancheng, Huai'an, Qinghai, Yangzhou, Inner Mongolia, Deyang as well as in Vietnam and Thailand. Trinasolar Group is actively expanding its global footprint with new manufacturing projects underway in the United States and aims to enhance its global capabilities and competitiveness in international markets.

In 2024, Trinasolar's Yancheng Dafeng Factory passed the TÜV Rheinland "Zero Waste" and "Zero Carbon" factory certification audits with high marks in environmental management system construction, energy conservation and emission reduction, and waste treatment. This milestone sets a new benchmark in the industry and reaffirms Trinasolar's commitment to sustainable development.

Additionally, two factories of Trinasolar Group have obtained the SA8000 Social Accountability Management System Certification, SSI certification against the ESG standard, and one factory has obtained the Business Social Compliance Initiative (BSCI) certification.

To identify and cultivate relationships with ethical suppliers, compliance with local labour laws and protection of labour rights are critical components of Trinasolar's strategy that ensure modern slavery risks across its global supply chain are non-existent. All potential suppliers must demonstrate legal compliance with local labour laws as a prerequisite for qualification as a vendor for Trinasolar Group. Further details regarding Trinasolar's policies, actions and risk mitigation efforts are addressed in the following sections of this statement.

Modern Slavery Risk Management

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

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

- Raw material suppliers;
- Storage and logistical providers;
- Trinasolar-owned and OEM factories;
- Distributors:
- Installers:
- EPC providers or developers for solar projects;
- Research and development partners;
- · Shareholders;
- Consumers (end-users); and
- Employees.

Supplier risks are managed through Trinasolar Group's internal procurement practices and the robust supplier performance evaluation system in the supplier selection process. Trinasolar has established different selection principles and qualification standards to fulfil various procurement needs. It issues a Supplier ESG Audit Checklist with environmental, social, business and ethics as well as traceability related questions to prospective suppliers. Based on the returned questionnaire, it assesses their compliance, environmental and social performance, and relevant qualification documents. In addition, it requires suppliers and partners to sign the Trinasolar Supplier Social Responsibility Agreement.

This document specifies that all suppliers and their supply chains must understand and comply with Trinasolar's policies on environmental, occupational health and safety, social responsibility and resource management, as well as Supplier Corporate Social Responsibility Code of Conduct. As part of this evaluation process, Trinasolar actively collects data and information from suppliers such as their employee turnover ratio, any reported health or ethics code breaches, and a number of other key metrics to ascertain the supplier's level of employee satisfaction.

All information provided by suppliers is rigorously assessed against Trinasolar Supplier Corporate Social Responsibility Code of Conduct. Non-compliance with the set criteria requires immediate remedial action by the suppliers; failure to do so will lead to their immediate suspension.

Internally, Trinasolar Group's human resources department regularly updates the employee handbook to ensure the latest labour laws and the rights of employees can be timely addressed in the workplace.

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

Policies and Governance

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

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

Documents accessible on its official website:

- **a)** <u>Trinasolar Global Human Rights</u> Principles
- **b)** 2024 Reconfirmation of the Product Stewardship Policy
- Environment, Occupational Health & Safety (EHS) and Energy Management Policy
- d) Corporate Social Responsibility
 Code of Conduct of Trinasolar
 Supplier (Outline)
- **e)** Trinasolar Supply Chain Due Diligence Manual

Documents available upon request:

- **a)** Code of Business Conduct and Ethics for Trinasolar's Employees
- **b)** Trinasolar ESG Management Policy

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

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

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

Actions

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

Trinasolar Group conducted specialised compliance training for all overseas employees, focusing on "Antifraud Prevalence and Code of Conduct". This initiative was designed to strengthen employees' awareness and understanding of their rights in the workplace and to acquaint them with Trinasolar Group's principles and specific measures for protecting human rights and ensuring fair treatment of all employees.

The Group also evaluates suppliers on various aspects, including labour use, social responsibility, safety, and environmental performance. Based on these evaluations, it assesses and recognises suppliers, providing targeted communication, training and counselling. Suppliers that fail to eliminate risks detected over time face restricted procurement, freezing or elimination.

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

For social area, the check points focus on:

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

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

Additionally, all Trinasolar Group and Trinasolar Australia employees, and all third-party partners, are always encouraged to report any suspected violations involving slavery or human trafficking, without fear of retaliation. Suspected incidents can be reported directly to Trinasolar's auditing and supervision department through a fully confidential and anonymous hotline, or by emailing IA@trinasolar.com.

Moreover, Trinasolar Group has enhanced its IT traceability system for its customers with the Phegda Big Data System, which provides customers with detailed reports on the materials used in specific shipments of solar modules.

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



Valuation of Effectiveness

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

- Ongoing reviews of key supplier agreements to ensure they include specific provisions addressing modern slavery;
- Continued delivery of comprehensive training programmes for all employees to heighten awareness of modern slavery risks, supplemented by competence evaluations to measure the impact and effectiveness of the training;
- Regular assessments and continuous monitoring of responses to Trinasolar Group's supplier Know Your Customer (KYC) questionnaire;
- Encouragement of self-reporting from Trinasolar Group and Trinasolar Australia's external partners regarding any identified or suspected issues related to modern slavery.

Trinasolar Group's commitment to sustainability has been externally audited since 2014 by EcoVadis, a leading independent auditor of business sustainability ratings worldwide. Trinasolar Group has consistently achieved good scores in its corporate social responsibility performance, particularly in environmental protection and employee rights, as evidenced by numerous awards from EcoVadis. All relevant certificates and accolades can be viewed at https://www.trinasolar.com/en-glb/esg/download. Trinasolar is also certified under ISO45001 for Occupational Health and Safety Management Systems and ISO37301 for Compliance Management System, further underscoring its dedication to maintaining safe and ethical working conditions and a robust compliance management system.



Continuous Improvement

Trinasolar acknowledges the importance of a zero-tolerance policy towards modern slavery within its ecosystem and recognises the need for ongoing improvements to its risk management system. To this end, Trinasolar Group and Trinasolar Australia have pinpointed several key areas for enhanced focus and future development.

- Enhanced Engagement: It aims to maintain continuous dialogue with employees, external partners, and service providers on all matters related to modern slavery risks. This ensures alignment with the expectations of Trinasolar Group as well as compliance with all applicable local jurisdictions.
- **Code of Conduct Review:** Regular examination of industry codes of conduct is essential to ascertain how these can be better integrated into Trinasolar's practices, ensuring timely improvements are made.
- Process Automation: Trinasolar is exploring options for the automation and streamlining of processes between itself and its suppliers through third-party solutions to enhance efficiency.

- **Performance Monitoring:** Ongoing assessment of Trinasolar Group's progress and performance is critical, both internally and externally, to ensure continuous improvement.
- Third-Party Audits: Trinasolar will increase the frequency and scope of thirdparty audits to validate compliance and assess working conditions on the ground.
- Country-Specific Risk Mapping:
 Trinasolar is refining its supplier risk assessments by incorporating country-specific human rights data to tailor due diligence efforts more effectively.
- Employee Feedback Loops: Internal surveys will be enhanced to include specific questions on ethical conduct, perceived risks, and human rights concerns, ensuring frontline insights inform continuous improvement.



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

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

It remains at your disposal should you have any queries on the above.

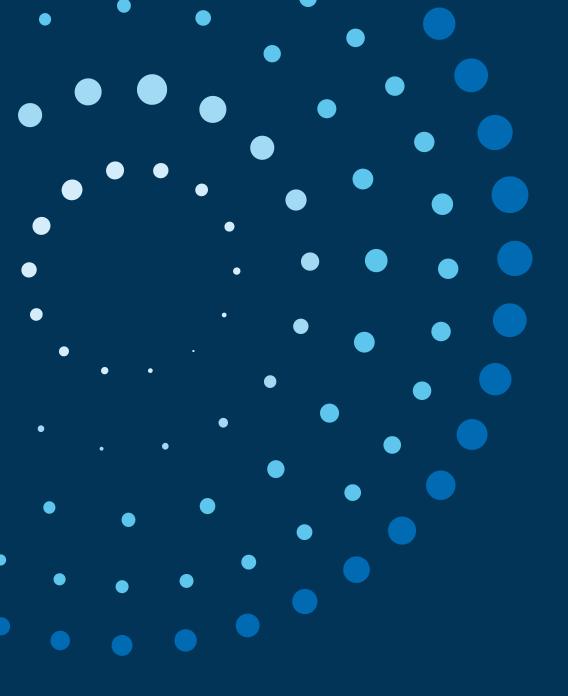
This statement was approved and signed by Ms. Liu Teng as the Sole Director and principal governing body of Trina Solar (Australia) Pty Ltd.

Date Signed: 9 June 2025

Liu Teng

Sole Director of Trina Solar (Australia) Pty Ltd





General enquiries

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

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

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