



Trina Solar (Australia) Pty Ltd  
**2023 Modern  
Slavery Statement**

[www.trinasolar.com/au](http://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 2023, 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.

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.

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.

# 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's leading photovoltaic ("PV") and smart energy total solutions provider.**

Trinasolar Group is mainly engaged in the following sectors:

- Research and development, production and sales of PV modules, trackers and energy storage products;
- Development of PV power stations and system products;
- Provision of PV power generation, operation and maintenance services; and
- Development and sales of intelligent microgrids and multi-energy systems, as well as the operation of energy cloud platforms, amongst other initiatives.

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 thirteen (13) full-time employees ranging from sales personnel to solar engineers, finance experts to support staff. On a global scale, Trinasolar Group has nearly fifty thousand (50,000) employees. Trinasolar Group's module shipments consistently rank in the top three within the industry. In 2023, Trinasolar Group's module shipment volume was 65.21GW, marking a 51.3% increase year-over-year. By the end of 2023, Trinasolar Group had supplied intelligent tracking solutions for over 700 PV power stations in more than 60 countries

around the world, with cumulative shipments of fixed structures and tracker products exceeding 20GW. Trinasolar Group has established regional headquarters in Zurich, Fremont (Silicon Valley), Miami, Singapore, Dubai, UAE, as well as offices and branch offices in Australia, South Korea, India, the UAE, Turkey, Italy, Germany, Spain, the UK, South Africa, Brazil, Chile, Colombia, and Mexico, and overseas manufacturing bases in Thailand and Vietnam. In recent years, Trinasolar has recruited international high-level management and R&D talents from more than 70 countries, and the business has spread to over 170 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 hired 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 (CSR), including the elimination of all forms of modern slavery, and adheres to ethical business practices in compliance with applicable laws, rules, and regulations in all operational regions. This commitment is supported by its Code of Business Conduct and Ethics, Social Responsibility Management Regulation, Trinasolar Global Human Rights Principles, employee handbook and various other guiding principles that govern its supplier verification and human resource management systems.

Trinasolar Group believes in being fully transparent with all partners and local authorities and continues to refine its tools to effectively address any and all potential risks associated with modern slavery.

# 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, Germany, Malaysia, Spain and Vietnam, are centrally managed by Trinasolar Group's procurement department in China. The company has developed and implemented the Trinasolar Supplier Code of Conduct, Supplier Environment, Health and Safety (EHS) and CSR Management Procedure, Identification and Traceability Management Guide as well as the Procurement Management Guidelines to provide directions for the full lifecycle supplier management. It includes environmental, social, and governance- (ESG) related clauses in its procurement contracts with suppliers. During the reporting period, the company revised the Trinasolar Supplier Code of Conduct to emphasise that suppliers should obtain and maintain ISO 14001, ISO 45001 and ISO 50001 certificates, or plan to obtain them, or have effective EHS and energy management

systems. In 2023, it further required suppliers to communicate its environmental and human rights requirements, as set out in the Trinasolar Supplier Code of Conduct, and the ESG-related clauses in the contract to their upstream supply chains.

Trinasolar Group owns and operates manufacturing production plants in the cities of Changzhou, Suqian, Yiwu, Yancheng, Huai'an and Qinghai in China, as well as Vietnam and Thailand. Trinasolar Group is expanding its global footprint, with new manufacturing projects underway in the United States, Indonesia and the UAE, and aims to enhance its global capabilities and competitiveness in overseas markets.

In 2023, significant progress was made on the construction of the Qinghai manufacturing facility in Qinghai province, China. This facility aims to pioneer the integration of a complete PV industry chain and establish a zero-carbon industrial park in Xining, Qinghai (herein referred to as the "Trina Qinghai Facility"). The first phase of this project, including the production lines for solar ingots, wafers, cells, and modules, has been completed and is now operational. The Trina Qinghai Facility is poised to reach full production capacity, starting with MG silicon, in the near future.

To develop and identify ethical suppliers, local employment and labour rights protection are critical aspects for Trinasolar in ensuring modern slavery risks are completely nullified throughout its global supply chain. As a prerequisite for approval, all potential suppliers must demonstrate compliance with local labour laws before they can become a qualified vendor for Trinasolar Group. Further details on policies, measures, and actions taken by Trinasolar to address these issues are discussed in subsequent 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, which work 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 EHS and CSR Audit Checklist with ESG-related questions to prospective suppliers. Based on the returned questionnaire, the company 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 the Trinasolar Supplier 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 code of ethics breaches, and a number of other key metrics to ascertain the suppliers' levels of employee satisfaction.

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

Internally, Trinasolar Group's human resources department regularly updates the company's employee handbook to ensure the latest labour laws and the rights of employees can be addressed timely in the workplace. Additionally, it offers online courses to all employees and conducts an annual engagement survey to measure employees' views on various aspects such as fair treatment, health and safety, benefits, and training opportunities. These initiatives help maintain its 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. It 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:

## 1) Documents accessible on its official website:

- a) [Trinasolar Social Responsibility Management Regulation](#)
- b) [Trinasolar Global Human Rights Principles](#)
- c) [Reconfirmation of the Product Stewardship Policy](#)
- d) [EHS and Energy Management Policy](#)
- e) [2023 Sustainability Report](#)

## 2) Documents available upon request:

- a) Trinasolar's Supplier Code of Conduct
- b) Trinasolar's Code of Business Conduct and Ethics
- c) Procurement Management Guidelines
- d) EHS and Energy Management Policy
- e) Supplier EHS & CSR Management Procedure
- f) EHS Management System & CSR Internal Audit Management Procedure

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;
- Quality Control; and
- Brand Management.

Trinasolar Group publishes its CSR 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 its global supply chain partners to ensure that they do not engage in or support forced labour practices.

# Actions

Trinasolar Group diligently maintains and periodically updates its Code of Business Conduct and Ethics, which strongly emphasises the protection of human rights and the fair treatment of all workers. This Code, 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 the company 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 new employees.

Trinasolar Group conducted from time to time specialised compliance training for all overseas employees, focusing on anti-fraud prevalence and Trinasolar's 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.

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

The Trinasolar Supplier 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. Trinasolar has developed and implemented the Supplier EHS & CSR Management Procedure, which requires procurement staff to record supplier performance in the Supplier EHS and Social Responsibility Form. This form includes fifty-six (56) assessment indicators of suppliers' performance across five (5) areas: environmental protection, occupational health and safety, fire safety and emergency preparedness, labour and human rights, and business ethics and sustainable procurement.

## **For labour and human rights assessment, the criteria 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.

Its standard supply and/or service agreements 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 Compliance Committee through a fully confidential and anonymous hotline, or by emailing [scc@trinasolar.com](mailto:scc@trinasolar.com).

Moreover, Trinasolar Group has enhanced its IT traceability system for its customers with the Phegda Big Data System, a traceability system

that 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 agreement 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; and
- 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 CSR 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/au/our-company/sustainability-downloads>). Trinasolar is also certified under ISO45001 for Occupational Health and Safety Management Systems and ISO37301 for Compliance Management Systems, further underscoring its dedication to maintaining safe and ethical working conditions and 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:** Maintaining continuous dialogue with employees, external partners, and service providers on all matters related to modern slavery risks will ensure alignment with Trinasolar Group's 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:** Exploration of options for the automation and streamlining of processes between Trinasolar 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.



# 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.**

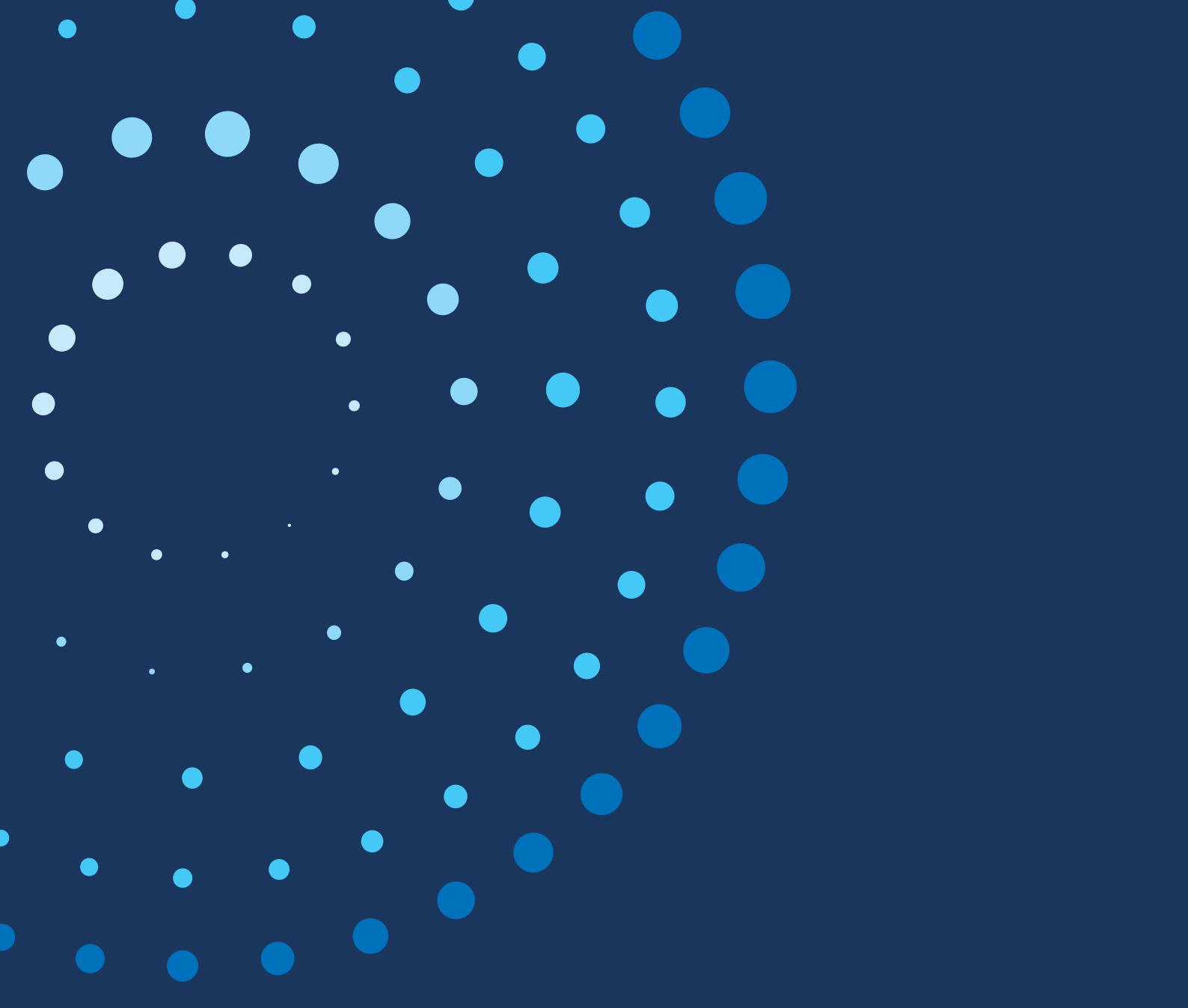
**This statement was approved and signed by Ms. Liu Teng as the Sole Director and principal governing body of Trina Solar (Australia) Pty Ltd.**

**Date Signed: 31 May 2024**



**Liu Teng**  
Sole Director of Trina Solar (Australia) Pty Ltd





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