



Trina Solar Co., Ltd.

# 2024 Modern Slavery Statement under the laws of England and Wales

# Introduction

Trina Solar Co., Ltd. (hereinafter referred to as "TCZ") is a Chinese company founded in 1997 and publicly listed at the Shanghai Stock Exchange with stock code: 688599.SH. TCZ undertakes business in the United Kingdom through the following subsidiaries:

- **Trina Solar (Schweiz) AG**, with its seat at Birkenweg 4, 8304 Wallisellen, Switzerland, registered under the laws of Switzerland and commercial registry number CHE-115.204.635 (hereinafter referred to as "TSW");
- **TRINA SOLAR UK HOLDCO LTD**, with its seat at Milton Gate, 60 Chiswell Street, London, EC1Y 4AG, United Kingdom, registered under the laws of England and Wales with company number 07427799 (hereinafter referred to as "UK Holdco");
- **Trina Storage (UK) Ltd.**, with its seat at Nottingham East Midlands Airport Herald Way, Pegasus Business Park, Castle Donnington, DE74 2TZ, United Kingdom, registered under the laws of England and Wales with company number 07988031 (hereinafter referred to as "TUK"); and
- **NCLAVE RENEWABLE S.L.U.**, with its seat at Avenida de Burgos 114, 2nd Floor, 2805 Madrid, Spain, registered under the laws of Spain and company number B96918867 (hereinafter referred to as "NCLAVE").

Together referred to as the "Subsidiaries" and collectively with their global affiliates referred to as "Trinasolar" hereinafter. For the financial year ending on 31st December 2024, TSW, TUK and NCLAVE each reported a turnover exceeding thirty six million British pound sterling, surpassing the threshold established by the Modern Slavery Act 2015 (hereinafter referred to as the "MSA") and, as such, are each subject to the MSA pursuant to Section 54 of the MSAMSA.

According to the MSA, commercial organisations subject to the MSA must publish a slavery and human trafficking statement for the financial year describing the steps the commercial organisation has taken during such year to ensure that slavery and human trafficking is not taking place (hereinafter referred to as "Statement").

The Statement published may include information about the commercial organization's:

- 1)structure and supply chains;
- 2)policies in relation to slavery and human trafficking;
- 3)due diligence processes;
- 4)risk assessment and management;
- 5)key performance indicators to measure effectiveness of steps being taken; and
- 6)training on modern slavery and trafficking.

The present Statement published by TCZ but representing Trinasolar as a whole, including TSW, TUK, NCLAVE and UK Holdco, 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 during the year of 2024.

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

Trinasolar is a world leading photovoltaic ("PV"), battery energy storage and PV tracker solutions provider. TCZ constitutes Trinasolar's headquarter with its seat in Changzhou City, Jiangsu Province, China. The supply of Trinasolar's products and the services provided thereto are undertaken with local or regional entities. In the United Kingdom, supply and provision of services are undertaken by the Subsidiaries.

## Trinasolar is mainly engaged in the following sectors:

- Research and development, production and sales of PV modules, trackers, fixed structures, and battery 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 is committed to pioneering smart solar energy solutions aimed at achieving a net-zero future. Through constant innovation, Trinasolar continues to push the renewable industry forward by creating greater grid parity of PV power and promoting the adoption of renewable energy. Trinasolar is consistently recognized globally as a top-tier player in the renewable energy sector. In addition, Trinasolar's downstream business includes project development of solar PV, battery energy storage and tracker, financing, design, construction, operations, management and comprehensive system integration solutions thereof for customers.

Trinasolar has nearly thirty thousand (30,000) employees globally. Trinasolar's module shipments consistently rank in the top four within the industry. In 2024, Trinasolar's module shipment volume was over 70GW. By the end of 2024, Trinasolar had supplied intelligent tracking solutions for more than 700 photovoltaic power stations in more than 60 countries around the world, with cumulative shipments of Fixed Structure and Tracker products close to 30GW. Furthermore, Trinasolar is experiencing significant growth in the battery energy storage sector, reflecting Trinasolar's commitment to sustainable energy solutions. To date, Trinasolar has successfully shipped more than 10 GWh in battery energy storage products across China, Europe, Middle East, Asia Pacific and North America, showcasing Trinasolar's global reach and impact. Trinasolar has established regional headquarters in Munich, Zurich, Fremont (Silicon Valley), Miami, Singapore, Dubai, 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 introduced international high-level management and R&D talents from more than 70 countries, and the business has spread to more than 170 countries around the world.

Trinasolar is committed to corporate social responsibility, 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 Trinasolar's Code of Business Conduct and Ethics, Social Responsibility Management Regulation, Trinasolar Global Human Rights Principles, Employee handbook and various other guiding principles that govern Trinasolar's supplier verification and human resource management systems.

Trinasolar 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 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's procurement department in China. Trinasolar has developed and implemented the Trinasolar Supplier Code of Conduct, Supplier EHS & CSR Management Procedure, Identification & Traceability Management Guide and the Procurement Management Guidelines to provide directions for the full lifecycle supplier management. Trinasolar includes ESG-related clauses in its procurement contracts with suppliers. During the reporting period, Trinasolar revised the Trinasolar Supplier Code of Conduct to emphasize that suppliers should obtain and maintain ISO 14001, ISO 45001 and ISO 50001 certificates, or plan to obtain them, or have effective environmental, health and safety, and energy management systems. Trinasolar further requires suppliers to communicate Trinasolar's environmental and human rights requirements, as set out in Trinasolar Supplier Code of Conduct and the ESG related clauses in the contract, to the suppliers' upstream supply chains.

Trinasolar owns and operates manufacturing production plants in the cities of Changzhou, Chuzhou, Huai'an, Qinghai, Suqian, Yiwu and Yancheng-Dafeng in China, as well as in Spain, Thailand and Vietnam. Trinasolar is expanding its global footprint with new models for localization, aiming to enhance its global capabilities and competitiveness in overseas markets.

Furthermore, the construction of the Chuzhou battery energy storage product manufacturing facility in Jiangsu Province, China was completed and is currently operating. The Chuzhou facility is a state-of-the-art, fully automated, and seamlessly connected battery cell factory. It is dedicated to producing precisely engineered battery cells, aiming to supply and promote renewable energy solutions worldwide.

In addition, Trinasolar's Yancheng-Dafeng and Yiwu factories have been certified against the Solar Stewardship Initiative's (herein referred to as "SSI") ESG Standard, following comprehensive third-party audits by the independent certification body TÜV SÜD. Established based on international due diligence principles and other existing industry schemes, the SSI's ESG Standard uses uniform criteria to assess the environmental, social and governance sustainability of companies in the solar value chain, aiming to build confidence in solar manufacturing practices and set the bar for ESG performance in the sector. The SSI ESG Standards are designed to be aligned with the requirements imposed by the EU Forced Labour Regulation and Corporate Sustainability Due Diligence Directive, both of which will come into force in 2027.

Meeting the standard underlines Trinasolar's market-leading commitment to ESG, and implementation of responsible and sustainable business practices throughout Trinasolar's supply chain. The SSI audits at the two sites follow the Yiwu facility becoming the first four-star Zero Carbon Factory in the solar industry; the Yancheng-Dafeng facility receiving zero-waste landfill and Zero Carbon Factory certification by TÜV Rheinland in October 2024; and the SA8000 certifications Trinasolar received in July 2024.

Finally, Trinasolar has participated in industry pilot audits against SSI's latest standard, the SSI Supply Chain Traceability Standard. This complements the SSI ESG Standard and sets out requirements for maintaining a traceability system, with the future goal of enabling an unbroken chain of custody throughout the solar value chain. Pilot assessments for the new SSI Supply Chain Traceability Standard were carried out at Trinasolar's Yangzhou and Huai'an factories in October 2024.

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. All potential suppliers must demonstrate compliance with local labour laws as a prerequisite for approval as a qualified vendor for Trinasolar. Further details on policies, measures, and actions taken by Trinasolar to address these issues will be discussed in subsequent sections of this Statement.

# Modern Slavery Risk Management

Trinasolar has classified modern slavery risks into external and internal categories. The external modern slavery risks are managed by Trinasolar's procurement team while any intercompany risks are managed by the human resources and legal & compliance departments of Trinasolar on a global as well as regional level.

## 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'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. Trinasolar issues a Supplier EHS and CSR Audit Checklist with ESG related questions to prospective suppliers. Based on the returned questionnaire, Trinasolar assesses the supplier's compliance, environmental and social performance, and relevant qualification documents. In addition, Trinasolar 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 Trinasolar's 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 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's Supplier Code of Conduct. Non-compliance with the set criteria require immediate remedial action by the supplier or lead to their immediate suspension.

Internally, Trinasolar's human resources department regularly updates its employee handbook to ensure the latest labour laws and the rights of employees can be timely addressed in the workplace. Additionally, Trinasolar offers online courses to all employees and conducts 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's commitment to fostering a respectful and ethical work environment.

# Policies and Governance

Trinasolar is deeply committed to upholding internationally recognized 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 (UNG), the ILO Declaration on Fundamental Principles and Rights at Work, the Organization 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 Trinasolar's long-term success.

**To manage and mitigate modern slavery risks, Trinasolar has established an integrated management system across its operations. Trinasolar is continuously committed to maintaining and enhancing this system to prevent any potential risks of modern slavery or other human rights violations. Trinasolar's 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 our official website:**

- Trinasolar Social Responsibility Management Regulation
- Trinasolar Global Human Rights Principles
- Reconfirmation of the Product Stewardship Policy
- EHS Policy
- 2024 Sustainability Report

**2) Documents available upon request:**

- Trinasolar Supplier Code of Conduct
- Trinasolar Code of Business Conduct and Ethics
- Procurement Management Guidelines
- Further Documentation in regard to Environment, Occupational Health & Safety (EHS) and Energy Management Policy
- Supplier EHS & CSR Management Procedure
- EHS Management System & CSR Internal Audit Management Procedure

**Trinasolar 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. Trinasolar 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 publishes its corporate social responsibility report based on standard social responsibility assessments integrated with results from annual inspections and evaluations of all its suppliers. Trinasolar's 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 diligently maintains and periodically updates its Code of Business Conduct and Ethics, which strongly emphasizes the protection of human rights and the fair treatment of all workers. This Code, mandatory for all employees, outlines Trinasolar'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 Trinasolar operates in. All employees of Trinasolar 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 conducts from time to time a specialized compliance training for all oversea employees, focusing on "Anti-fraud 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's principles and specific measures for protecting human rights and ensuring fair treatment of all employees.

Trinasolar evaluates suppliers on various aspects, including labour use, social responsibility, safety, and environmental performance. Based on these evaluations, Trinasolar 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's Supplier Code of Conduct emphasizes 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:**

<ul style="list-style-type: none"> <li>-Commitments, policies, or statements regarding respect for human rights that comply with or exceed international and national laws and regulations;</li> <li>-Strict prohibition of child labour (including interns);</li> </ul>	<ul style="list-style-type: none"> <li>-Strict prohibition of forced labour (including interns);</li> <li>-Freedom of association and collective bargaining;</li> <li>-Anti-discrimination; and</li> <li>-Employee rights and remuneration management.</li> </ul>
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Trinasolar's standard supply and/or service agreements globally include labour and legal compliance clauses to reinforce these commitments.

All Trinasolar 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 accessible here, or by emailing [scc@trinasolar.com](mailto:scc@trinasolar.com).

**In addition, Trinasolar has also implemented a grievance mechanism and a whistleblowing channel policy in Europe, which purpose is to enable Trinasolar employees in Europe to report in their own name or anonymously any non-compliance or misconduct in relation to any internal or external regulation in force, or any risk of breach that may occur (including but not limited to, any conduct that would breach the Trinasolar Code of Business and Ethics, Trinasolar Stewardship Policy and EHS Policy). This whistleblowing channel is available through, e.g. the following:**

- e-mail address [tswcompliance@trinasolar.com](mailto:tswcompliance@trinasolar.com); or
- by post in a sealed envelope addressed to the relevant regional compliance officer.

Moreover, Trinasolar 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. 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 recognizes 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 inclusion of specific provisions addressing modern slavery.
- Continued delivery of comprehensive training programs 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's supplier Know Your Customer (KYC) questionnaire.
- Encouragement of self-reporting from Trinasolar and its external partners regarding any identified or suspected issues related to modern slavery.

Trinasolar's commitment to sustainability has been externally audited since 2014 by EcoVadis, a leading independent auditor of business sustainability ratings worldwide. Trinasolar 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-gb/our-company/sustainability-downloads>). Further, Trinasolar joined the United Nations Global Compact in 2024. In addition, Trinasolar is also certified under ISO45001 for Occupational Health and Safety Management Systems and ISO37301 for Compliance management system, further underscoring Trinasolar's 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 recognizes the need for ongoing improvements to its risk management system. To this end, Trinasolar has pinpointed several key areas for enhanced focus and future development:

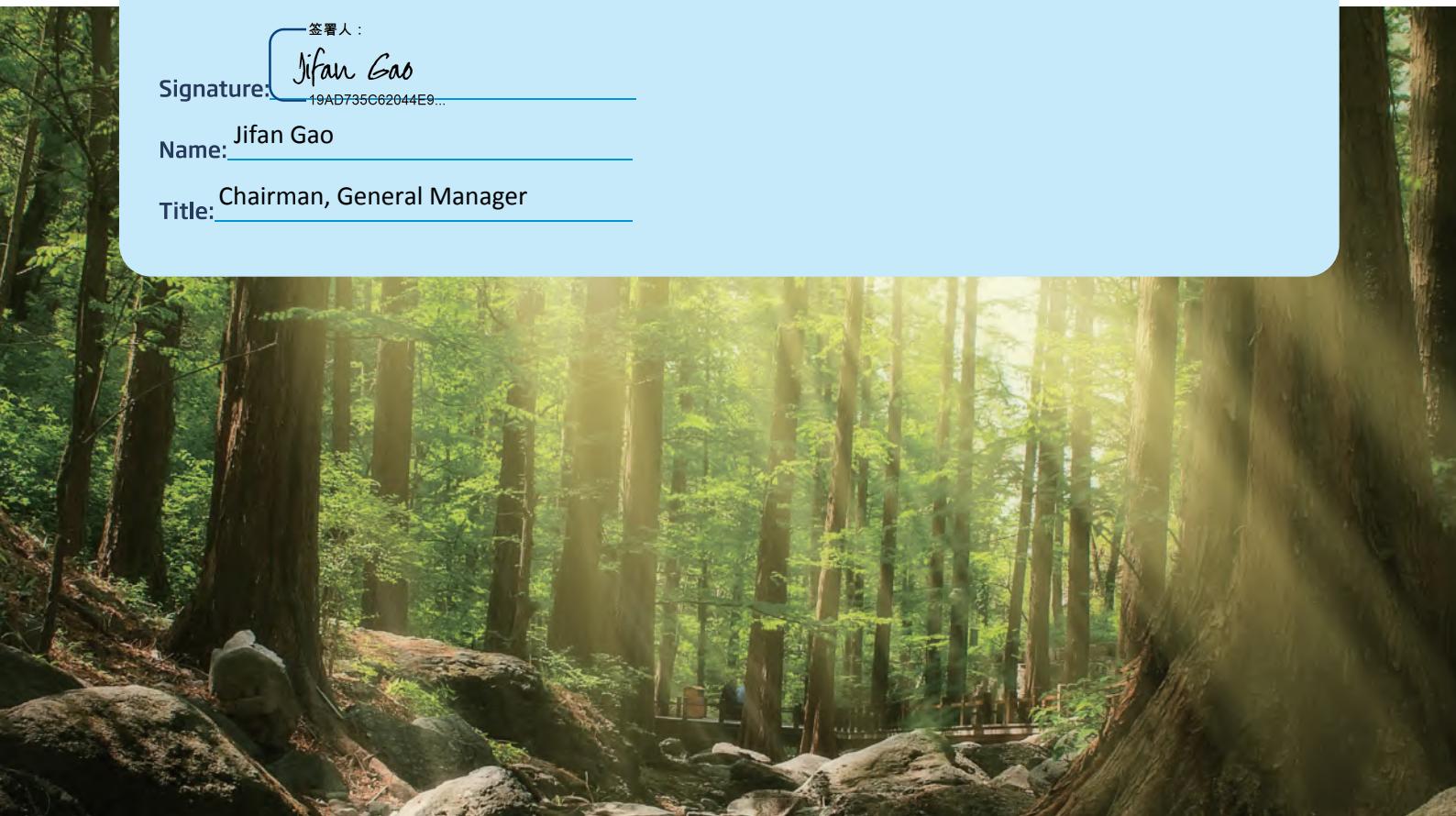
- **Enhanced Engagement:** Trinasolar aims to maintain continuous dialogue with employees, external partners, and service providers on all matters related to modern slavery risks. This ensures alignment with the expectations of Trinasolar as well as compliance with all applicable local jurisdictions.
- **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 Trinasolar and its suppliers through third-party solutions to enhance efficiency.
- **Performance Monitoring:** Ongoing assessment of Trinasolar's progress and performance is critical, both internally and externally, to ensure continuous improvement.

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

The present Statement was approved by the board of directors of Trina Solar Co., Ltd. and signed by the undersigned directors below, duly authorized to publish this Statement.

Date: 19.06.2025

签署人：  
Signature:   
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Name: Jifan Gao  
Title: Chairman, General Manager





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