

## Trina Solar (Schweiz) AG 2022 Modern Slavery Statement

This statement is made pursuant to the UK Modern Slavery Act 2015 (the “**Act**”) on behalf of Trina Solar (Schweiz) AG (hereafter referred to as “**TSW**”). This entity is doing business in the United Kingdom and is part of the wider Trina Solar Group.

Trina Solar Group (hereafter referred to as “**Trina Solar**”) was founded in 1997, of which the headquarter is in Changzhou city, Jiangsu Province, China. Trina Solar is the world-leading PV and smart energy total solution provider. Trina Solar engages in PV products R&D, manufacture and sales; PV projects development, EPC, O&M; smart micro-grid and multi-energy complementary systems development and sales, as well as energy cloud-platform operation. Trina Solar has been ranked as one of the top 3 PV module manufacturing companies in the world.

Trina Solar's code of conduct, to which every employee must adhere, defines our company's values and guiding principles. They include a commitment to conduct business ethically as well as compliance with all laws, rules and regulations in the places/countries where it does business. These guiding principles are embedded in everything the company does. Trina Solar believes in partnering with others who share its values and who understand the importance of always conducting business ethically.

Trina Solar commits to no use of child labor and forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor and will not tolerate slavery in any of its business or supply chains.

This statement outlines the efforts to eradicate forced labor from its supply chains and the actions taken by Trina Solar to address modern slavery risks in our business and supply chains over the period 1 January 2022 pursuant to 31 December 2022.

### **Our Organization's Structure and Business**

TSW is a company specialized in the sale of Photovoltaic modules and carries on business in the Europe region, including in the UK, with our regional headquarters based in Zurich, Switzerland. We are a part of the Trina Solar Group, and our ultimate parent company is Trina Solar Co., Ltd. Trina Solar Co., Ltd has its head office in Changzhou, Jiangsu Province, People's Republic of China and listed on the Shanghai Stock Exchange Science and Technology Innovation Board.

Trina Solar has over 23,000 employees globally and is present in more than 100 countries and regions including regional headquarters in Zurich, Tokyo, Singapore, Dubai, Fremont and Miami and sales offices in Spain, Mexico, Italy, Australia, Chile, Germany, France, Columbia, Brazil and India, and manufacturing facilities in Thailand and Vietnam. TSW has 19 employees.

In 2022, Trina Solar shipped 43.09GW of modules and 4.4 GW of trackers in total and had an operating income of RMB 85,052 million.

Our Europe business is organized in the following segments:

- the manufacturing and sales of solar modules (MBU),
- trackers; and

- energy battery solutions (Storage).

Within Europe these segments operate out of three main offices in Zurich, Madrid and Munich.

The three business segments operate as individual segments within the Trina Solar Group however are internally aligned to ensure that Trina Solar can offer energy solutions to its customers.

### **Our Supply Chains**

TSW's main activity is the distribution of solar panels, which it purchases from its parent company located in China.

Trina Solar's supply chain covers more than 80 procurement items, including raw materials, auxiliary materials, infrastructure, equipment, spare parts, packaging, logistics services, personal protective equipment, office suppliers, certification services, etc. equipment, office suppliers, etc. According to the requirements of production, the upstream and downstream supply chain mainly involves the procurement of EVA, backsheet, tin-coated tape, glass, silver and other materials.

Trina Solar's suppliers are mainly from China, German, Malaysia, Spain and Vietnam and are centrally managed by Trina Solar Group's procurement department in China.

We are well aware of that the sustainable development challenges and risks faced by enterprises are being increasingly affected by the supply chain. This is the reason why in the year of 2022, Trina Solar has started construction of its Qinghai manufacturing facility with its investment amount being over RMB 50 billion, in Qinghai province, China, which will provide a full photovoltaic industry chain and take the lead in building a "zero carbon industrial park integrating source, network, load, and storage" in Xining, Qinghai (hereinafter referred to as "**Trina Qinghai Facility**"). Now, Trina Qinghai Facility has already begun producing the solar ingots by itself and it targets to have sufficient production capacity starting from MG polysilicon in the near future.

To develop and identify potential suppliers, local employment and labour rights are amongst the most important criteria for Trina Solar to eradicate any modern slavery risks all throughout its global supply chain as the above. All potential suppliers are required to commit their compliance with all local labour laws as precondition to be approved as the qualified vendor for Trina Solar Group. More details will be introduced in later sections of this statement as policies, measures, and actions having been taken by Trina Solar.

During the reporting period, to the best of our knowledge, there was zero forced labor incident from our operating site and suppliers.

### **Our Policies on Slavery and Human Trafficking**

At Trina Solar, we comply with the international labor rights standards and regulations, including not involving any illegal employment, child labor and forced labor.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

To date, Trina Solar has issued and established:

- Trina Solar Social Responsibility Management Regulation (accessible at <http://static.trinasolar.com/sites/default/files/Trina%20Solar%20Social%20Responsibility%20Management%20Regulation.pdf>);
- 2023 Reconfirmation of Product Stewardship policy issued and signed by our Group CEO, Mr. Jifan Gao (accessible at [http://static.trinasolar.com/sites/default/files/Product\\_Stewardship\\_Policy\\_2023.pdf](http://static.trinasolar.com/sites/default/files/Product_Stewardship_Policy_2023.pdf)).
- Trina Solar Code of Business Conduct and Ethics (updated in 2022 with a strong emphasis on the protection of human rights and fair treatment of all workers);
- Trina Solar Global Human Rights Principles (accessible at [http://static.trinasolar.com/sites/default/files/TrinaSolar\\_Global\\_Human\\_Rights\\_Principles.pdf](http://static.trinasolar.com/sites/default/files/TrinaSolar_Global_Human_Rights_Principles.pdf))
- The Supplier EHS Management Procedure.

Our 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 Trina Solar's Compliance Committee, through a fully confidential and anonymous hotline accessible at <http://wb.trinasolar.com:8090/RCPFM/Trinasolar/report>, or via email to the report email address: [scc@trinasolar.com](mailto:scc@trinasolar.com). Information about our whistleblowing scheme is publicly disclosed in Trina Solar's contractual documentation, Code of Ethics and Corporate Social Responsibility Report.

In addition, at a regional scale, TSW has also implemented a whistleblowing channel policy, which purpose is to enable Trina Solar 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 act or conduct that would breach the Trina Solar Code of Business and Ethics, Trina Solar Stewardship Policy and EHS Policy). This whistleblowing channel is available through the following e-mail address [tswcompliance@trinasolar.com](mailto:tswcompliance@trinasolar.com) or, by post in a sealed envelope addressed to the compliance officer of TSW, and is managed by the EU Compliance Officers.

## **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk, Trina Solar has enacted a CSR management standard and performs EHS and CSR internal audit on a regular basis via document review, site inspection and employee interviews.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains; and
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.

Trina Solar implements dynamic management of suppliers and manage all supplier information, status and performance appraisal to promote supplier improvement.

Trina Solar also establishes a supplier performance evaluation system so that regular evaluation can be conducted on the aspects of quality, cost, delivery, service and innovation, and to implement commitment of legal employment and no conflict minerals, etc.

Among other items, Trina Solar's supplier audit includes (but is not limited to):

- Code of Ethics: Suppliers shall follow the code of ethics of fairness and integrity in all aspects of business conduct, procurement, production and operation;
- Safety and Health: Supplier shall obtain and update all necessary health and safety permits, provide a safe and healthy workplace, and reduce accidents, injuries, and occupational health hazards;
- Prohibition of child labor, forced labor and abusing labor: Suppliers shall employ workers who reach the legal minimum age for employment and prohibit corporal punishment of employees and any form of forced labor, including prison labor, contract labor, bonded labor, military labor or slave labor.

Importantly, based on the evaluation results, Trina Solar conducts communication and guidance, to promote supplier improvement. However, for suppliers who do not show any improvement over a certain period of time, Trina Solar will gradually implement restricted procurement, freezing and blacklisting. In the process of supplier development and dynamic performance evaluation, any supplier who does not provide the commitment letter of legal employment, or conflict minerals, etc. will not be listed as our company's supplier.

An assessment review of more than 1,700 suppliers of Trina Solar has also been completed in 2021. Based on the review result, a few suppliers were provided improvement notices (non-labor related) by Trina Solar.

In addition, Trina Solar sets up an IT traceability system for its customers named Phegda Big Data System, which is continually being updated. Such system can generate trace report of the material of particular shipment of solar modules, as required by the customer in advance. Now, Trina Solar is updating such traceability system as to include the solar products to be manufactured by Trina Qinghai Facility.

## **Supplier adherence to our values and ethics**

We strive to ensure that our products do not incorporate or contain components or materials that have been themselves produced manufactured or provided using force labor or slavery in any form.

To ensure all those in our supply chain and contractors comply with our ethics, we have in place a rigorous supply chain compliance program.

We have a dedicated team in charge of the corporate social responsibility management which involves the following departments:

- Legal Affairs department
- Compliance department
- Internal Audit department
- Environmental Health and Safety department
- Purchasing department
- Quality department
- Human Resource Management department; and
- Brand Management department.

Trina Solar issues its corporate social responsibility report based on a social responsibility assessment, annual inspections and evaluations conducted of all its suppliers.. The 2022 Sustainability Report is accessible at [http://static.trinasolar.com/sites/default/files/TrinaSolar\\_CSRreport\\_ESG\\_2022\\_EN.pdf](http://static.trinasolar.com/sites/default/files/TrinaSolar_CSRreport_ESG_2022_EN.pdf).

Trina Solar's contract terms and letters of commitments with all of its suppliers reaffirm Trina's commitment to zero tolerance for forced labor from any of our upstream suppliers.

Trina Solar's global supply chain team monitors Trina Solar's global supply chain partners to ensure that such partners will avoid any involvement or sourcing associated with forced labor practices.

Trina Solar has communicated to its suppliers the importance of the commitment to fair treatment of laborers, but also a commitment to permit transparent investigation regarding the origin of materials and the working conditions of employees. Through contract terms, letters of commitment, shared tracing information, and supplier audits, Trina Solar is confident that its suppliers comply with their social responsibility obligations, including labor practices.

### **Training**

Trina Solar requires that all employees complete the Company's mandatory compliance training at least annually. As part of that training, employees are required to explicitly acknowledge that they understand their responsibilities with respect to compliance with all governing laws and regulations, as well as operating in a manner consistent with the ethical principles that govern Trina Solar and its subsidiaries.

Trina Solar will continue to work to build awareness of modern slavery and ethical sourcing issues among employees, particularly those responsible for overseeing its modern slavery due diligence as well as buyers of products and services.

### **Our effectiveness in combating slavery and human trafficking**

Trina Solar's sustainability efforts are being audited 2014 by EcoVadis, an independent rating auditor, and one of the largest and most trusted providers of independent business sustainability ratings worldwide. Trina Solar Group has continuously been rewarded over the

years with outstanding records for protection of the environment and of employee rights in corporate social responsibility performance surveys conducted by EcoVadis (all such certificates are accessible at <https://www.trinasolar.com/en-glb/our-company/sustainability-downloads>). Trina Solar is also certified with ISO45001 Occupational Health and Safety Management Systems.

### Continuous Improvement

Trina Solar acknowledges that, as part of its commitment to implement zero tolerance towards modern slavery within its ecosystem and business on a day-to-day basis, it is necessary to continuously review its risk management system and make improvements where and when necessary.

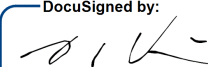
Trina Solar Group and TSW have identified some key areas for additional focus, and for future development, including:

- continued engagement with employees, external partners and service providers on all topics related to modern slavery risks to ensure full satisfaction with Trina Solar Group expectations and those of all local jurisdictions;
- examining industry codes of conduct and how these may apply to Trina Solar Group and Trina Solar's practices in an improved way on a timely basis;
- investigation of any options for the automation and streamlining of Trina Solar Group and Trina Solar's suppliers through third-party solutions; and
- continued measuring of Trina Solar Group and Trina Solar's progress and performance, both internally and externally.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2022. It was approved by the board of directors of Trina Solar (Schweiz) AG and has been signed by two of our authorized directors.

Date: June 22, 2023

Signature:

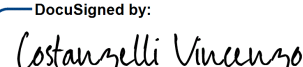
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