

22nd November 2023

To the NSW Independent Planning Commission,

RE: Sourcing and manufacturing of solar panels proposed to be used at the Glenellen Solar Farm

The Glenellen Solar Farm (the 'Project') has been undergoing assessment since 2018, with the Environmental Impact Statement (EIS) exhibited in late 2020, and the Submissions Report and associated Amendment Report submitted to the Department of Planning and Environment (DPE) in December 2022. The DPE referral was ultimately obtained in October 2023, subsequently referring the project to the NSW Independent Planning Commission.

Following the public meeting held with the NSW Independent Planning Commission on November 16th, 2023, a Questions on Notice has been received to further elucidate the source of the solar panels and the manufacturing supply chain of the solar panels.

As one of the global leading solar manufacturers, Trina Solar has always committed to complying with all applicable laws, rules, and regulations. We are further committed to conducting businesses in an ethical, humane, and responsible manner. As part of enforcing this commitment, Trina Solar strives to ensure that our products do not incorporate or contain components or materials produced, manufactured or provided using forced labor or slavery in any form. Trina implements strict supply chain management procedures in our daily business operations. We have also regularly reviewed contract terms and letters of commitments with all our suppliers to reaffirm our zero tolerance for forced labour from any of our upstream suppliers.

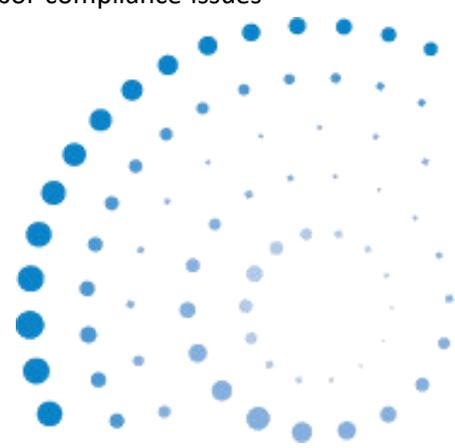
(1) Trina's global supply chain team monitors our global supply chain partners worldwide to ensure that they avoid any involvement or sourcing associated with forced labor practices.

Please find attached Trina Solar Australia's 2022 Modern Slavery Statement, which is in accordance with the Modern Slavery Statement Act 2018 (Cth).

We have already registered the attached statement at Australian Border Force website:
<https://modernslaveryregister.gov.au/statements/13299/>

(2) Trina has communicated the importance of fair treatment of laborers and the need for transparent investigation into the origin of materials and the working conditions of employees. Through contract terms, letters of commitment, shared tracing information, and supplier audits, Trina ensures that our suppliers comply with our social responsibility obligations, including labor practices.

(3) We conduct periodic checks and audits among our suppliers ourselves and through independent third parties appointed by us. Suppliers found to have labor compliance issues and refuse to cooperate with investigations or be transparent are blacklisted. Additionally, for certain key materials, Trina procures raw materials for suppliers to process, ensuring Trina has complete control over the origin of raw materials.



(4) Externally, Trina's sustainability efforts are being audited by EcoVadis since 2014. EcoVadis is the world's largest and most trusted provider of business sustainability ratings, creating a global network of more than 75,000 rated companies. You may find all of our EcoVadis Certifications from our official website (link below).

A summary of the sourcing and manufacturing of solar panels proposed to be used at the Glenellen Solar Farm:

The source of the solar panels

Trina Solar sources its solar panels from a network of suppliers primarily located in China, Germany, Malaysia, Spain, and Vietnam. These suppliers are centrally managed by Trina Solar Group's procurement department in China.

The company operates multiple manufacturing production bases in Changzhou, Suqian, Yiwu, and Yancheng in China, as well as in Vietnam and Thailand. Additionally, Trina Solar is constructing a solar photovoltaic manufacturing facility in Wilmer, Texas, investing over \$200 million in property and equipment. Once completed, this facility aims to produce 5 GW of modules.

Trina Solar has established itself as a reliable supplier to Australian customers, serving both large utility enterprises and numerous small businesses and households. Notably, the company has received a 100% bankability rating for seven consecutive years from Bloomberg New Energy Finance and has been awarded the highest AAA rating in the Module Tech Bankability Ratings report by PV-Tech.

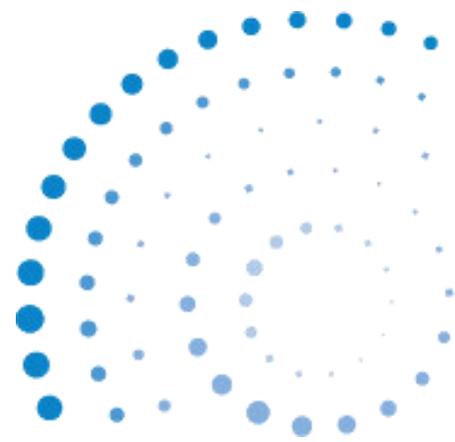
The manufacturing supply chain of the solar panels, including details about Trina Solar's commitments that all reasonable steps are taken to ensure modern slavery is not used in the supply chain.

Trina Solar Group and Trina Solar Australia have classified modern slavery risks into external and internal categories. The external modern slavery risks are managed by Trina Solar Group's procurement team while any intercompany risks are managed by the human resource and legal & compliance departments of Trina Solar Group and Trina Solar Australia together.

Trina Solar Group manages supplier risks through internal procurement practices and a supplier performance evaluation system. This system rates suppliers on a scale of one (1) to five (5), considering their commitment to corporate social responsibility and treatment of workers. It involves evaluating metrics like employee turnover ratio, reported breaches related to health or ethics, and other key factors to gauge supplier's employee satisfaction.

All supplier-provided information undergoes assessment against Trina Solar's Code of Business Conduct and Ethics. Non-compliance necessitates immediate remediation by the supplier or results in their immediate suspension.

Internally, Trina Solar Group's human resource department regularly updates employee handbooks to align with applicable laws concerning employees' rights at work. Additionally, we offer online courses and conduct an annual engagement survey for all employees. This survey helps gauge sentiments regarding fair treatment, health and safety, benefits, training, and other relevant aspects.

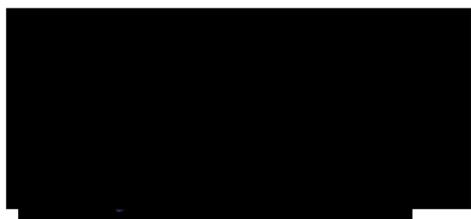


You can find more information:

- 2022 Modern Slavery Statement **Annex I**
- Trina Solar's Code of Business Conduct and Ethics: **Annex II**
- Trina's vision on sustainability: <https://www.trinasolar.com/au/our-company/sustainability-downloads>

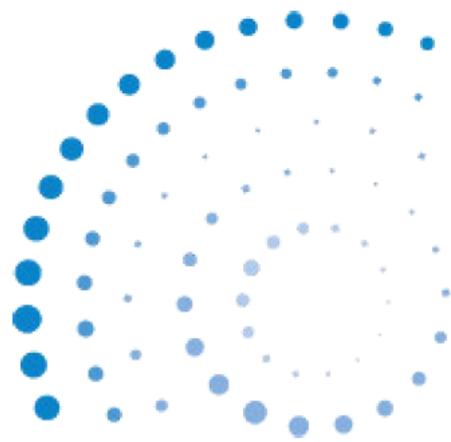
We are dedicated to maintaining satisfaction by aligning with Trina Solar Group's standards and local regulations through ongoing engagement. This commitment involves fostering open communication and collaboration with employees, external partners, and service providers to comprehensively address modern slavery risks. Prioritizing regular evaluations of industry codes of conduct helps enhance our practices. We are actively exploring ways to automate and optimize processes within Trina Solar Group and among its suppliers using third-party solutions. Our steadfast focus on measuring and evaluating progress, both internally and externally, underscores our commitment to continuous excellence.

Kind regards,

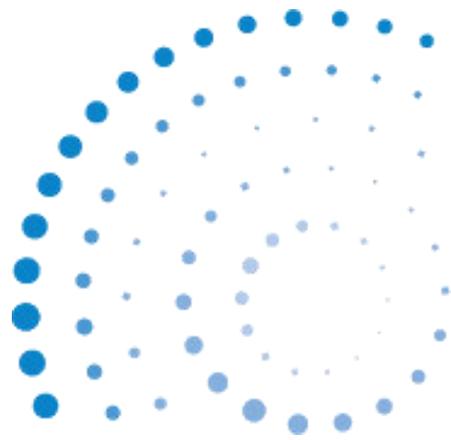


Jose Flores

Trina Solar | Head of Development
On behalf of Glenellen Solar Farm Nominees Pty Ltd.
Email :  | www.trinasolar.com



Annex I: 2022 Modern Slavery Statement



The Trina Solar logo is located in the top right corner. It features the word "Trina" in a bold, blue, sans-serif font, with a small red dot above the letter 'i'. To the right of "Trina" is the word "solar" in a lighter blue, sans-serif font. The background of the entire page is a photograph of a large solar panel array under a bright blue sky with white clouds. In the top left corner, there is a decorative pattern of blue circles of various sizes, some solid and some with a white outline, arranged in a grid-like pattern that tapers off towards the top left.

Trina solar

Trina Solar (Australia) Pty Ltd

2022 Modern Slavery Statement

www.trinasolar.com/au

Introduction

Trina Solar (Australia) Pty Ltd ACN 150 695 524 is committed to human and labour rights and to the global eradication of modern slavery in all its forms.

Trina Solar (Australia) Pty Ltd (ACN 150 695 524) (hereinafter to be referred to as **“Trina Solar Australia”**), along with its headquarter being a China listed company and its global affiliates (collectively to be referred to as **“Trina Solar”** or **“Trina Solar Group”**), is fully committed to preserving all human and labour rights and to the global eradication of modern slavery in all its forms.

During the course of the current reporting period of financial year ending on 31st December 2022, Trina Solar Australia, had achieved revenue of more than one hundred million Australian dollars, being the threshold under 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 highlights Trina Solar’s areas of risk, the actions that have been taken or are being taken by Trina Solar to actively address such risks, and how Trina Solar measures its effectiveness in eliminating the risk of modern slavery in connection with its operations and supply chain.

Trina Solar continually endeavours to work with its suppliers and stakeholders to raise awareness of modern slavery and commits to effectively communicate our expectations and, where appropriate, take any actions necessary to eradicate modern slavery risks.

In line with the Act, Trina Solar defines “modern slavery” as including 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

Trina Solar Australia is the Australian arm and wholly owned subsidiary of Trina Solar Group, whose parent company, Trina Solar Co., Ltd., was founded in 1997 (stock code: 688599.SH) with its headquarter based in Changzhou City, Jiangsu Province, China. Trina Solar Group is the world leading PV and smart energy total solutions provider.

Trina Solar Group is mainly engaged in:

- the research and development, production and sales of PV modules, trackers and storage products;
- PV power stations and system products;
- PV power generation, operation and maintenance services; and
- the development and sales of intelligent micro-grids and multi-energy systems, as well as the operation of energy cloud platforms, amongst other things.

Trina Solar Group is committed to leading the way in smart solar energy solutions for a net-zero future. Through constant innovation, Trina Solar Group continues to push the PV industry forward by creating greater grid parity of PV power and by popularizing renewable energy. Trina Solar Group has been consistently ranked as the first tier PV module manufacturer in the world. In addition, Trina Solar Group's downstream business includes solar PV project development, financing, design, construction, operations and management, and one-stop system integration solutions for customers. Trina Solar Group has connected over 5.5GW of solar power plants to the grid worldwide.

As of May 2023, Trina Solar Australia has twenty-three (23) full time employees that range from sales personnel to solar engineers, finance experts and support staff. Globally, Trina Solar Group has more than twenty-three thousand

(23,000) employees, and has shipped 43.09GW of PV modules and 4.4GW of trackers throughout the calendar year of 2022. Trina Solar Group now sells PV products in more than one hundred (100) countries, with regional business centre in Singapore, Tokyo, Zurich, Dubai, Fremont and Miami, global sales and office centres in Spain, Mexico, Chile, Italy, Germany, Australia, United Arab Emirates, France, Columbia, Brazil and India, and production bases in Vietnam and Thailand.

Trina Solar Australia provides solar panels to EPC project partners, constructors of solar farms and wholesalers. Its employees in Australia are all engaged through lawful labour contracts as per local laws and are free to associate with their respective unions, as they may see fit.

Trina Solar Group is committed to corporate social responsibility, including eliminating all forms of modern slavery, and to conducting business ethically and in compliance with all laws, rules, and regulations in the places/countries where it operates. This is implemented through our Code of Business Conduct and Ethics, our Social Responsibility Management Regulation, Trina Solar Global Human Rights Principles and various other guiding principles within our suppliers' verification and human resource management systems.

Trina Solar Group believes in being fully transparent with all partners and local authorities and will continue to refine its tools to address any and all modern slavery risks.

Trina Solar Supply Chain

Trina Solar's supply chain covers more than eighty (80) types of procurement products that are broadly spread into the following categories:

These are broadly spread into the categories below:

- raw materials;
- auxiliary materials;
- infrastructure;
- equipment;
- accessories;
- packaging;
- logistics;
- transportation;
- labour protection supplies;
- office supplies; and
- third-party certification services.

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.

Trina Solar Group now owns and operates several manufacturing production bases respectively in Changzhou, Suqian, Yiwu, Yancheng in China, in Vietnam and in Thailand. 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.



Modern Slavery Risk Management

Trina Solar Group and Trina Solar Australia have classified modern slavery risks into external and internal categories. The external modern slavery risks are managed by Trina Solar Group's procurement team while any intercompany risks are managed by the human resource and legal & compliance departments of Trina Solar Group and Trina Solar Australia together.

Areas of risks identified by Trina Solar within its business operations include:

- raw material suppliers;
- storage and logistical providers;
- Trina Solar 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 Trina Solar Group's internal procurement practices and the supplier performance evaluation system. These provide our suppliers with a score between one (1) to five (5) in relation to their corporate social responsibility commitments and overall treatment of workers. As part of these systems and overall evaluation, Trina Solar actively seeks information from its 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 assessed against Trina Solar's Code of Business Conduct and Ethics and any failure to comply with the set criteria means either full remediation by the supplier is immediately required or there is immediate suspension of said supplier.

Internally, Trina Solar Group's human resource department periodically updates our employee handbooks to reflect the employee's rights at work in accordance with all applicable laws. Furthermore, we provide online courses to all employees as well as an annual engagement survey to gauge all employees' sentiments on fair treatment, health and safety, benefits, training and so on.



Policies and Governance

The policies of Trina Solar Group associated with addressing modern slavery risks are contained within the following documents:

Trina Solar's Code of Business Conduct and Ethics

(to be provided upon request);

Trina Solar's Social Responsibility Management Regulation

(<http://static.trinasolar.com/sites/default/files/Trina%20Solar%20Social%20Responsibility%20Management%20Regulation.pdf>);

Trina Solar Global Human Rights Principles

(http://static.trinasolar.com/sites/default/files/TrinaSolar_Global_Human_Rights_Principles.pdf);

2023 Reconfirmation of the Product Stewardship Policy

(http://static.trinasolar.com/sites/default/files/Product_Stewardship_Policy_2023.pdf).

Trina Solar Group strives to ensure that their products do not incorporate or contain components of materials that have been produced, manufactured or provided using any form of forced labour or slavery. There is a well-established team who are responsible for developing and monitoring compliance in relation to modern slavery, as follows:

- Internal audit;
- Global compliance;
- Legal department;
- Human resources department;
- Procurement department;
- Quality Control; and
- Brand Management.

Trina Solar Group issues its corporate social responsibility report based on a social responsibility assessment, annual inspections and evaluations conducted of all its suppliers (**2022 Sustainability Report** is accessible at http://static.trinasolar.com/sites/default/files/TrinaSolar_CSRreport_ESG_2022_EN.pdf).

Trina Solar Group's global procurement team monitors Trina Solar Group's global supply chain partners to ensure that such partners avoid any involvement whatsoever with forced labour practices.



Actions

In 2022, Trina Solar Group updated its Code of Business Conduct and Ethics, with a strong emphasis on the protection of human rights and fair treatment of all workers. All Trina Solar Group and Trina Solar Australia employees have received the updated Code of Business Conduct and Ethics and were provided with compliance training in order to ensure awareness of the risks of modern slavery and human trafficking. Trina Solar's Code of Business Conduct and Ethics, to which every employee must adhere, defines the company values and guiding principles, including a commitment to conduct business ethically as well as in compliance with all laws, rules and regulations in the places/countries where doing business.

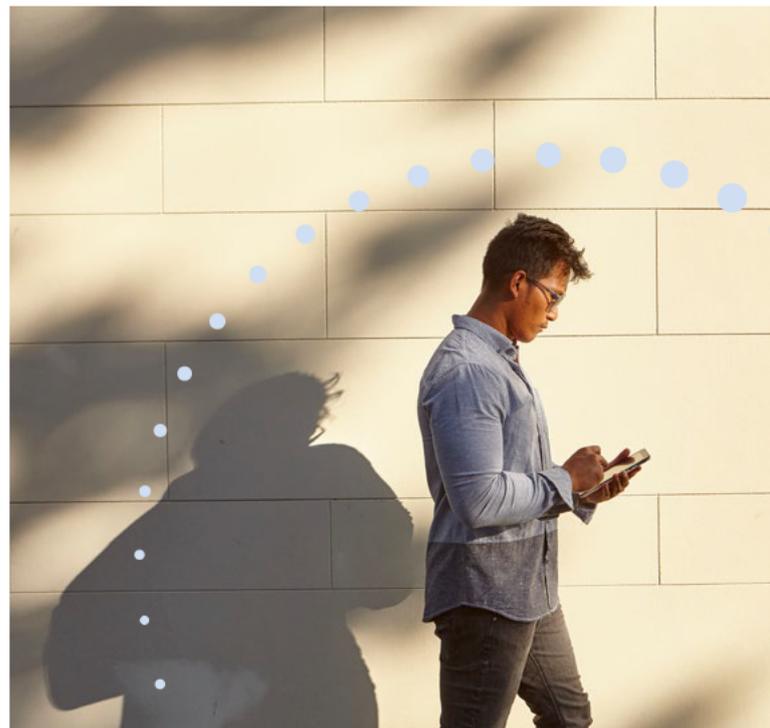
Labour and legal compliance clauses have always been included as part of the standard supply and/or service agreements worldwide being applied by Trina Solar Group and Trina Solar Australia.

Additionally, all Trina Solar Group and Trina Solar 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 Trina Solar's Compliance Committee through a fully confidential and anonymous hotline, or via email to the report email address: scc@trinasolar.com

Besides, Trina Solar Group 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 Group is updating such traceability system as to include the solar products to be manufactured by Trina Qinghai Facility.

Finally, all new suppliers must sign and execute a letter of commitment/undertaking confirming the lawful employment of all their workers before

they are approved as a Trina Solar Group's qualified supplier. Such letter includes a commitment to pay salaries on time and in accordance with local laws and regulations, as well as providing insurance coverage to its employees, strictly abiding by the provisions on working hours in the given jurisdiction and to not recruit workers that are underage or are viewed as forced labour.

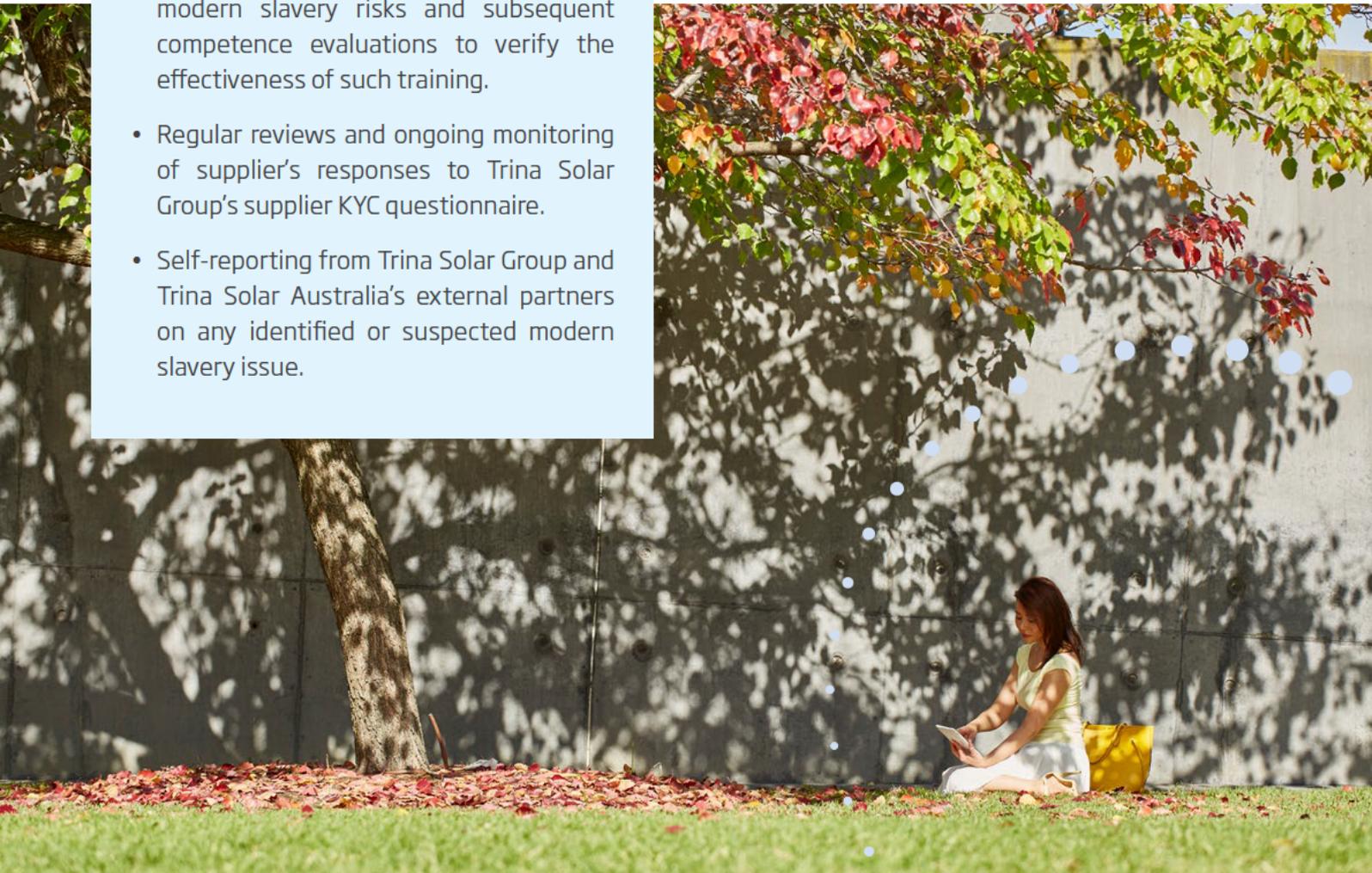


Valuation of Effectiveness

Trina Solar acknowledges that it may continue to encounter modern slavery risks and its efforts to mitigate these risks will be an ongoing process. In order to accurately assess and measure the effectiveness of Trina Solar's actions, the company aims to provide updated reports on the following:

- Continued reviews of its key supplier agreements to ensure provisions related to modern slavery are included.
- Continued training provided to all employees to increase awareness of modern slavery risks and subsequent competence evaluations to verify the effectiveness of such training.
- Regular reviews and ongoing monitoring of supplier's responses to Trina Solar Group's supplier KYC questionnaire.
- Self-reporting from Trina Solar Group and Trina Solar Australia's external partners on any identified or suspected modern slavery issue.

Trina Solar's sustainability efforts have been audited since 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 Trina Solar Australia 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.

We remain at your disposal should you have any queries on the above.

Date Signed:



Ding Ying
Director



Jiang Yanhong
Director



General enquiries

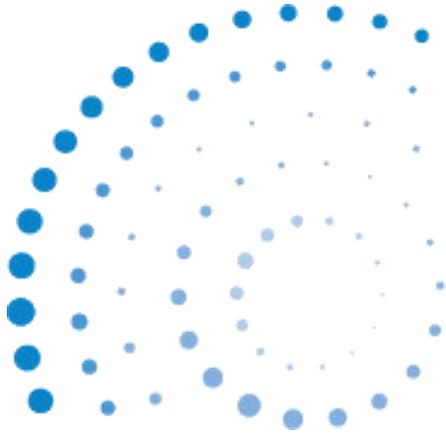
Tel: +61 1300 874 627 Fax: +61 2 9199 8006
(Monday to Friday 9:00am to 4:30pm)

3 Banfield Road
Macquarie Park NSW 2113
ABN: 24 150 695 524

www.trinasolar.com/au

Trinasolar

Annex II: Trina Solar’s Code of Business Conduct and Ethics





Trina Solar

Code of Business Conduct and Ethics

Leading Department: Internal Audit

Support Department: Legal Affairs, HR

Approval By: Gao, Jiqing Wu, Sen Zhan, Jing

Document N.O.: TSC-RC-007

Effective Date: Nov 11, 2022

Table of Contents

1.0 Fundamental Principles	4
2.0 Applicability	4
3.0 Internal Business Activities	4
3.1 Working Environment	4
3.1.1 Prohibition of Sexual Harassment and Discrimination	4
3.1.2 Commitment to Health and Safety	5
3.1.3 Prohibition of Alcoholic Beverages and Illegal Drugs	5
3.1.4 Protection of Human Rights and Fair Treatment at Work	5
3.2 Protection of Company Assets	6
3.2.1 Tangible Assets	6
3.2.2 Intangible Assets	6
3.2.2.1 Confidential Information	6
3.2.2.2 Intellectual Property Rights	7
3.2.2.3 Participate in External Standards-related Organizations	8
3.2.2.4 Open Source Software Activities	8
3.2.3 Resignation Handover	8
3.3 Information Recording, Reporting and Retention	9
3.3.1 Expense Reimbursement	9
3.3.2 Accounting Records	9
3.3.3 External Reporting	9
3.3.4 Records Preservation and Destruction	10
3.4 Personal Information	10
3.5 Personal Belongings	10
4.0 External Business Activities	10
4.1 The Authority to Make Commitments or Sign Contracts on behalf of the Company	11
4.2 Transactions with Suppliers	11
4.3 Market Competition	12
4.4 Relationship with Other Organizations	12
4.4.1 Business Contacts with Competitors	12
4.4.2 Relationships with Government or Government Officials	12
4.4.3 Dealing with Media, Judicial Personnel and Other Stakeholders	13
4.5 Respect Intellectual Property Rights of Others	13

4.5.1 Information Owned by Others	13
4.5.2 Accept Confidential or Restricted Information.....	14
4.5.3 Obtaining Software from Others.....	14
4.5.4 Using Patent of Others	14
4.5.5 Use of Trademarks of Others	14
4.5.6 Copyright of Others	14
4.6 Gifts and Hospitality	15
4.6.1 Gifts and Hospitality Offering.....	15
4.6.2 Acceptance of Gifts and Hospitality.....	16
4.7 Obeying the Law	16
4.7.1 Competition Regulations	16
4.7.2 Import and Export Regulations	17
4.7.3 Environmental Protection Regulations.....	17
4.7.4 Financial Reporting Regulations.....	17
5.0 Personal Behaviors.....	18
5.1 Avoid Conflicts of Interest	18
5.1.1 No Assistance with Competitors	18
5.1.2 No Competition with Trina.....	18
5.1.3 No part-time Work with Suppliers	18
5.1.4 Do not inappropriately perform during working hours or use Company assets.....	18
5.1.5 No abuse of Company Influence	19
5.1.6 Management of Conflicts of Interest	19
5.1.7 Disclosure of Conflicts of Interest	19
5.2 No Insider Trading with Inside Information.....	20
5.3 Constraints on Personal Behaviors	20
6.0 Violation Report.....	20
7.0 Immunity from Enforcement of the Code.....	21
8.0 Conclusion	21
9.0 Update History	21
10.0 Supplementary Provisions	21

1.0 Fundamental Principles

Trina Solar Co., Ltd. (the "Company") employees' compliance with the laws and ethical standards in the business conduct is a prerequisite for the long-term sustainable development of the Company. Following analysis of the real cases and the globalization of business, the Company organized comprehensive discussions and developed this Code of Business Conduct and Ethics (the "Code").

The standards set out by the Code are higher than those required by the business practices, laws, rules or regulations. The Code insists on high standards to emphasize that the employees are expected to be honest, perform their duties properly, prevent fraudulent activities, deter wrongdoing. It further promotes the behaviors as follows:

- Be honest and trustworthy when engaging in business activities and handling business relationships;
- Comply with the laws and regulations applicable to the operations of the Company;
- Protect and properly use corporate assets, and respect the intellectual property rights of others;
- Act in the interest of the Company and manage the conflicts of interest in a proper manner;
- Respect diversity in the workplace, and treat the cultures and religions of customers, suppliers, business partners and employees from all over the world with respect and fairness.

2.0 Applicability

The Code applies to employees, directors, supervisors and external consultants of the Company and its global-wise wholly owned or holding unlisted subsidiaries. If you have any questions about the Code or want to report any violations, please do so through the following channels:

- Email: IA@trinasolar.com;
- Online reporting platforms: <http://wb.trinasolar.com:8090/RCPFM/Trinasolar/report>, or scan the QR code to enter



3.0 Internal Business Activities

3.1 Working Environment

3.1.1 Prohibition of Sexual Harassment and Discrimination

The Company is committed to providing equal employment opportunities in all areas and never tolerates the behavior as follows:

- Discrimination based on ethnicity, race, religion, sex, age, nationality, disability or other

legally protected categories;

- Any words or actions with a sexual connotation.

3.1.2 Commitment to Health and Safety

The Company is committed to providing a safe and healthy workplace for its employees. It is the responsibility of each employee to maintain a safe and healthy working environment for every employee by following environmental, safety and health rules and practices, and to report accidents, injuries and unsafe equipment, practices or conditions. The following behaviors may damage the working environment and may even violate the laws, so the Company prohibits:

- Offensive language or acts of violence;
- Intimidation and coercion;
- Behaviors that cause or encourage workplace conflicts or chaos;
- Possession of any form of weapons;
- Use, distribution, sell or possession of illicit drugs and other controlled substances without legitimate medical reasons.

3.1.3 Prohibition of Alcoholic Beverages and Illegal Drugs

Each employee shall perform their duties in a manner that is safe and free from the influence of alcohol, illegal drugs or other controlled substances. The use of any alcohol or other controlled substances in the workplace is prohibited.

3.1.4 Protection of Human Rights and Fair Treatment at Work

The Company is committed to upholding the principles for the protection and promotion of human rights advocated by the International Labor Organization. It constantly assesses its global supply chains on the protection of human rights which means it prohibits the employment of child labor and forced labor, including prison labor, contract labor, bonded labor, or other forms of forced labor.

The Company respects and values the individuality and diversity that every employee brings to the business and seeks to create a positive and open working environment wherever it operates. The Code aims to establish the right practices for respectful and ethical treatment of employees, and in promoting sustainable conditions through which employees earn fair wages in safe and healthy workplaces through:

- Placing a high priority on the employee's health and safety and the safety of the

environment in which they work;

- Basing relations with every employee on respect for the dignity of the individual and fair treatment for all;
- Operating fair and just remuneration policies; and
- Operating in an environment of trust and as such the Company does not tolerate any fraudulent or dishonest behavior by employees either within the organization or in dealing with other stakeholders.

3.2 Protection of Company Assets

The Company has a variety of assets, both tangible and intangible. Employees shall protect the assets from theft, damage or misuse; report actual or suspected theft, damage or misuse of assets in a timely manner; and protect all the programs, data, correspondence and written materials to ensure that the assets are effectively used for legitimate business purposes. It is necessary to be alert to any potential risks and immediately report any exceptions to an employee's direct supervisor or responsible department.

3.2.1 Tangible Assets

The tangible assets, i.e. plant, equipment, operating system, facilities, company credit card, supplies, etc., shall only be used for the business or for the purpose authorized by management.

3.2.2 Intangible Assets

3.2.2.1 Confidential Information

All inventions, creative works, computer software and technical or trade secrets developed by employees in the course of performing their duties or mainly developed by using materials and technical resources of the Company shall be the property of the Company.

The Company implements strict confidentiality policy. During the term of employment, employees shall abide by all written or unwritten confidentiality rules and policies and fulfill their confidentiality obligations. Employees shall not disclose, publish or release the Company's trade secrets or other confidential information without the prior approval of the Company, and shall not use such confidential information outside the scope of their work duties. Even outside the workplace, employees must remain vigilant and shall not disclose information related to the Company, its business, customers, or employees. Employees' confidentiality obligations shall survive after

termination of employment.

Employees shall also avoid unintentionally disclosing confidential information. As such, employees shall not discuss confidential information with any unauthorized party, or in any place where an unauthorized party is present, i.e. trade fairs, airports, etc., or when using mobile phones, radio and other electronic media or databases. Employees shall also avoid discussing confidential information when talking to family members or friends, as they may unknowingly or inadvertently reveal it to other parties. The disclosure of a small amount of classified information can also lead to a serious breach as the leaked snippets can be combined with snippets from other sources to form a complete confidential information.

3.2.2.2 Intellectual Property Rights

The Company's intellectual property rights include but not limited to patents, trademarks, copyrights, trade secrets and other information. Employees shall comply with the Company's intellectual property and information confidentiality policies, protect and legally use the Company's intellectual property.

All the rights and interests associated with intellectual achievements, obtained by employees from management, technology, product planning, program design, scientific research, training or other work, shall be owned by the Company as far as legally possible. These intellectual achievements include but not limited to: ideas, inventions, designs, computer programs and various technical documents related to the Company's present or future business, and research and development, as well as ideas, inventions, designs, computer programs and technical documents generated by employees engaged in business with or on behalf of the Company. Employee shall report to the Company any such intellectual achievement.

During employment with the Company, employees shall:

- identify whether there is an intellectual property issue before developing a new product or service, or using the name of a new product or service;
- seek advice from the Intellectual Property Department before applying for a patent, and submit a copy of the patent applied for or obtained, and the underlying technology to the Intellectual Property Department;
- not introduce or disclose information of the new products or services without authorization before the completion of patent application by the Intellectual Property Department;
- seek advice from the Intellectual Property Department if an employee believes that the idea, invention, design or computer program is not within the scope of the Company's current or future business, or is not achieved in the course of performing their business duties.

The intellectual property rights of the inventions and creations made by an employee are still owned by the Company within one year after their departure, retirement or transfer, and the employee shall disclose such information to the Company and assist with the application for corresponding intellectual property rights. The detailed rights and obligations shall be defined in the local employment agreements

3.2.2.3 Participate in External Standards-related Organizations

Before participating in any external standards-related organizations and activities, employees must obtain the approval of the direct supervisor and follow the professional advice given by the Intellectual Property Department. Employees attending standards-related activities shall:

- Understand and comply with the Company's and employees' commitments and obligations to the standards-related organizations;
- Take on responsibility to protect the Company's trade and technical secrets, especially when making commitments or contributions to an organization;
- Apply for intellectual property rights related to the standards as early as possible, no later than when the standards are publicly solicited for comments;
- Discuss with the Intellectual Property Department and the Quality Department to determine the patent utilization strategy if the Company owns a patent for a certain technology;
- Take on responsibility to avoid any conflicts of interest.

3.2.2.4 Open Source Software Activities

Participation in or involvement in any open source software activity may result in issues that conflict with the interests of the Company or may improperly dispose or transfer the Company's intellectual property. Therefore, employees who participate in open source software activities, or intend to use open source code, shall seek guidance from responsible management and the Intellectual Property Department, and comply with the relevant regulations and requirements of the Company.

3.2.3 Resignation Handover

If an employee leaves the Company for any reason, they must turn over the Company assets, including but not limited to documents and any media containing proprietary information, and shall not disclose or use such information. After an employee's departure, the Company continues to own

the intellectual property created during their employment. Employee leaving the Company shall not take or use any Company assets, documents, codes, technologies and other proprietary information, even if it is generated or created by the employee during the term of employment.

3.3 Information Recording, Reporting and Retention

Employees shall accurately and honestly record and report information, including but not limited to product test reports by product engineers, sales reports by sales personnel, revenue and cost reports by accounting personnel, research reports by R&D personnel, and service reports by customer service personnel. Accurate and reliable records are essential to the Company's business. Our records are the basis for our earnings statements, financial reports and other external disclosure materials, and forms the source of data guiding business decisions and strategic planning. The Company's records must be complete, accurate and reliable in all material respects. Employees shall not make any false or misleading records, or conceal any funds, or incoming and outgoing amounts.

3.3.1 Expense Reimbursement

The Expense Reimbursement Form is an important form of report commonly used by employees. Expenses may be claimed to the extent permitted by the Company policies, but they must be genuine and incurred for business purposes. No reimbursement shall be made for any expenses not actually incurred or for any expenses incurred for non-business reasons. False reimbursement is a dishonest behavior and is absolutely prohibited.

3.3.2 Accounting Records

According to the relevant laws, the Company must keep the accounting records of various business transactions which must be true and accurate. It is forbidden to provide false reports to management and auditors.

3.3.3 External Reporting

When providing external parties with financial, environmental or other reports, employees must make sure that there are no errors, false or misleading statements in these reports, otherwise it may incur civil, or even criminal liability for themselves and the Company.

3.3.4 Records Preservation and Destruction

Employees should comply with the Company's records management policies, and properly retain and destroy the documents accordingly. It applies to information stored on any medium, including paper documents or electronic records, such as e-mails.

3.4 Personal Information

The Company and its authorized employees will obtain and retain personal information in connection with employment. As a multi-national organization, the Company's business processes, management structures and technical systems are executed across countries. Employee personal information may be transferred to countries in which the Company operates for business purposes. This practice shall be accepted by employees and the personal information must be restricted to personnel who need to access such information.

Personnel who have access to employee personal information shall not disclose it to other parties except for business needs and with the consent of the management.

3.5 Personal Belongings

The Company has the right to open office facilities and equipment provided by the Company for its employees. In order to protect the personal and corporate assets, the Company may require inspection of employees' personal belongings stored in the workplace, including briefcase, handbag, etc. placed on or removed from the Company's premises. Employees should cooperate with such inspection. Without authorization, employees shall not invade any colleague's working space, including electronic files, etc.

4.0 External Business Activities

Employees must comply with business ethics and applicable laws in all aspects of business, regardless of purchasing, selling or otherwise. The Company has various relationships with other organizations, entities or individuals, including customers, authorized business partners, suppliers, government authorities, etc. No matter what type of organization, entity or individual an employee is in contact with, and no matter what their relationship with the Company is, employees should follow the following guidelines when conducting external business activities.

4.1 The Authority to Make Commitments or Sign Contracts on behalf of the Company

The Company's contract signing processes and authorization mechanisms are designed to protect its assets and provide appropriate management controls to enable the Company to effectively conduct business with customers, business partners, suppliers and other third parties.

Employees shall not make promises or enter into agreements, commercial or otherwise, outside of due process and authorization. In other words, employees shall not make any oral or written commitment to a third party before obtaining relevant authorization, such as reaching a new contract or modifying the existing contract. Sales personnel shall not accept payments from customers, in cash or through personal accounts, at any time.

Integrity, based on clear communication, is an integral part of ethical behavior that leads to trust, and is vital to maintaining stable and lasting relationships. Employees shall not make any wrong or false statement to any party in the external business communications. If an employee infers that there may be misunderstanding, they shall clarify immediately.

4.2 Transactions with Suppliers

In selecting suppliers, the decision shall be made without bias and the most suitable supplier should be selected in the best interests of the Company. No matter which department an employee is work for, and no matter how much the procurement volume is, they should adhere to the principle of impartiality.

4.2.1 No matter whether an employee's position can affect the selection and evaluation of suppliers, they shall not use or attempt to use their influence to make certain suppliers receive "special treatment". Any disclosure of such influence will undermine the integrity of the Company's existing procedures. Employees should not purchase from related suppliers, especially those owned or managed by their family members. When an employee's family members or friends have an interest with a supplier of the Company, they should take the initiative to declare and avoid the transaction with the supplier.

4.2.2 Quotation and other information of the supplier, as well as the Company's evaluation of such information, shall be regarded as confidential information, and current and former employees shall not use such information outside of work without the written permission of management.

4.3 Market Competition

The Company aims to outperform competitors fairly and honestly through superior performance, not illegal or unethical business practices. Employees shall be committed to treating customers and competitors fairly and respecting their rights. When participating in market competition, they shall not only be active and effective, but also be legal and adherent to business ethics.

Employees shall not unfairly take advantage of others by handling, withholding, abusing privileged information, misrepresenting facts or any other illegal trade practice. Competitors or their products and services should not be wrongly or misleadingly stated or described. Such behavior may cause dissatisfaction of customers and competitors. The comparison with competitor's product and service quality must be made completely and correctly according to the facts.

4.4 Relationship with Other Organizations

4.4.1 Business Contacts with Competitors

Employees may frequently meet, talk to, or attend industry or association meetings with competitors. Their engagement with competitors, i.e. selling products to, purchasing products from, participating in bids and trade shows, or dealing with trade associations or organizations, shall be in line with the Company's procedures and rules in place.

- When dealing with competitors, employees shall not discuss the Company's pricing strategy, contract terms, costs, inventory, marketing and product plans, market research and studies, production plans and capacity, or any other confidential information;
- Discussions or cooperation with a competitor in connection with the above items may violate applicable laws. If a competitor mentions any of these items, even if it is understated or unintentional, an employee should immediately object and end the conversation, and clarify that they are not allowed to have this conversation. Employees may leave the conversation if necessary.

4.4.2 Relationships with Government or Government Officials

Employees shall not, in the course of conducting business, provide money or any gifts that may lead to suspicion of having a special relationship with a government authority or government official.

4.4.3 Dealing with Media, Judicial Personnel and Other Stakeholders

- Employees shall not accept interviews from journalists, consultants or other personnel to answer questions related to the Company unless authorized by responsible department;
- Without authorization, employees are not allowed to express opinions or release information on the media in the name of the Company, nor to attend public activities on behalf of the Company;
- When lawyers, judicial personnel, investigators or other personnel request an employee to provide information related to the Company's business, such request should be transferred to the Legal Department for processing. A request from the police or procurator should be raised to Internal Audit.

4.5 Respect Intellectual Property Rights of Others

It is a key principle to respect the intellectual property rights of other parties. Employees shall understand and abide by the laws and regulations concerning trade secrets, proprietary information and other intellectual property rights in the countries where they operate, respect other parties' intellectual property rights, and avoid economic or criminal penalties against individuals or the Company due to improper use of intellectual properties of others. If you have any questions about the appropriate use of intellectual property rights of others, please seek advice of the Intellectual Property Department.

4.5.1 Information Owned by Others

Other companies and organizations need to protect intellectual property, including confidential information. For business purposes, these companies and organization may be willing to disclose and consent to the use of their proprietary information. If employees receive proprietary information from others, they should handle it with due care and seek guidance from the Intellectual Property Department if necessary to avoid charges of illegal or unauthorized use of proprietary information from others.

Without authorization of any third party and consent of the Company, employees shall not bring any proprietary information of any third party or any other information with intellectual property rights into workplace or use it in business of the Company.

Employees shall abide by the confidentiality obligations to third parties during and after their employment with the Company.

4.5.2 Accept Confidential or Restricted Information

To avoid charges of illegal or unauthorized use of another party's confidential or restricted information, employees shall handle such information with due care. Except as permitted by a contract, such information shall not be used, reproduced, distributed or disclosed.

4.5.3 Obtaining Software from Others

Employees shall ensure that the third party software used is legally licensed and is used in compliance with the terms of the license contract.

- Before accepting software from others, using software or materials on the Internet, or signing a license contract, employees shall follow the procedures in place, such as requesting the Legal Department to review the license contract;
- Software acquired on a personal device may not be copied and installed on any Company devices, and such personal device shall not be brought into workplaces.

4.5.4 Using Patent of Others

In principle, the use of third-party patents is prohibited. During R&D and product design process, employees shall identify and manage the intellectual property risks corresponding to the technology and market conditions involved in the underlying products. If the patent must be used, it shall be examined and approved by responsible management and approved by the Intellectual Property Department.

4.5.5 Use of Trademarks of Others

Like the Company, many organizations have their own trademarks (i.e. words, names, symbols or graphics, etc.) that highlight and differentiate their products or services. Trademarks include registered and unregistered trademarks.

Employees shall recognize and appropriately use the trademarks of other companies in the countries or regions where they conduct business and ensure that their trademarks are used in accordance with the relevant policies of the trademark owners.

4.5.6 Copyright of Others

Companies and individuals own the copyright of their created works, including literary, photographic

images, audio and video, font, layout design, graphic or 3D design, and art works, such as printmaking, sculpture, painting, architectural works and software copyright, etc. These copyright owners may, in accordance with the law, have an exclusive right to their works and prohibit others from using or copying, modifying, showing, exhibiting, modifying, translating and other derivative rights.

Employees shall recognize and properly use the copyrights of other companies and individuals in the countries or regions where they conduct business, and ensure that they obtain permission from copyright owners to use the copyrights.

4.6 Gifts and Hospitality

Gifts offered by companies vary significantly, ranging from merchandises of insignificant value to bribes that can never be accepted or offered. Not only is an article a gift, but services, rebates and discounts are also gift items. Gifts and hospitality should never compromise or indirectly undermine objective and fair business decisions.

Employees shall not offer or accept gifts or hospitality that exceed the acceptable value, and follow the rules as follows:

4.6.1 Gifts and Hospitality Offering

Employees may accept or offer to others normal and appropriate business hospitality, such as meals, etc. provided that the cost is reasonable and not prohibited by laws, or the business practices of customers, business partners or suppliers.

Frequent hospitality impairs the objective judgment of employees. Employees shall deal with external banquets and social activities with due care. If they feel that an invitation is inappropriate, they shall refuse or pay for it by themselves. Employee shall not provide any benefit in the following form to any party for the purpose of obtaining or retaining business opportunities or preferential treatment for the Company:

- It is prohibited to offer an advantage in order to obtain an unfair business relationship or preferential decision;
- It is prohibited to offer benefits to promote or use the Company's products, technologies services or to receive preferential treatment from business partners (except for genuine marketing activities approved by responsible departments and management);

- It is prohibited to offer any form of kickbacks to individuals or companies.

4.6.2 Acceptance of Gifts and Hospitality

Employees shall refrain from accepting bribes, and any gifts that may affect the business relationship shall not be accepted by employees and their family members. It is strictly forbidden to, directly or indirectly, ask for gifts or benefits from interested parties. Acceptance of kickbacks, commissions, tips are prohibited. In some special cases, if an employee receives money or gifts that cannot be refused, they shall immediately report to their supervisor and hand it over to the Company.

4.6.3 Abide by the Laws and Business Customs

Employees shall comply with the local laws, regulations and business customs on gift and hospitality offering. An employee shall not give any monetary or valuable gift to any supplier, customer or management or employee of any organization that may affect or is suspected to affect their relationship with the Company, except gifts of average value in accordance with the laws and business customs.

4.7 Obeying the Law

The Company operates in many countries all over the world with multi-nationality workforce. Employees shall comply with the laws of the country or region in which they work, as well as the international business practices and recognized standards. These laws, practices or standards relate to various areas including but not limited to investment, trade, import and export, foreign exchange, labor, environment, contracts, consumer protection, intellectual property rights, accounting, taxation, etc. If you have any questions about how to obey these laws, practices or standards, please contact Internal Audit who will liaise with responsible department to seek their advice for you.

4.7.1 Competition Regulations

In many countries in which the Company operates, the local governments implement competition laws and regulations. Employees shall comply with the local competition rules and follow the relevant requirements set out in the Code.

4.7.2 Import and Export Regulations

As a global enterprise, the Company engages in internal trade in many countries. Employees in such area shall understand and abide by the applicable import and export laws and regulations as well as export control policies, and shall not violate these rules. Breach of these laws and regulations may result in severe penalties for the Company, including fines, loss of import and export licenses, and even criminal liabilities. Employees shall not take advantage of their position at the Company to smuggle, regardless of corporate or personal belongings.

4.7.3 Environmental Protection Regulations

The Company is committed to protecting environment, complying with laws on environmental protection, and enhancing environmental awareness of employees. If an employee's work duties involve measuring, recording or reporting emissions or disposing of hazardous wastes, they must comply with the environmental laws and permits, and ensure the accuracy and completeness of the reports they submit.

4.7.4 Financial Reporting Regulations

As a publicly traded company, the Company is required to report its financial performance and other important information regarding its operations to the public and the China Securities Regulatory Commission (the "CSRC"). Employees shall:

- Strictly abide by the laws and regulations on financial reporting;
- Understand and comply with the financial reporting rules;
- Not assist anyone with improper bookkeeping, or producing false or misleading financial reports;
- Disclose information about the Company's operations, financial condition, and performance in a timely, accurate, and complete manner. It is prohibited to help anyone to record or report information that is inaccurate or potentially misleading;
- Be alert and immediately report their awareness of any inaccurate or incomplete financial statements. Employees shall pay particular attention to: financial results inconsistent with the business performances, transactions with no commercial substance, attempts to avoid routine inspections and approval procedures, etc.

Employees are prohibited from forcing, manipulating, fraudulently influencing the external auditors in order to materially mislead the Company's financial statements.

5.0 Personal Behaviors

Employees shall not conflict with their responsibilities as an employee of the Company, misuse the resources or influence of the Company, or damage the reputation of the Company.

5.1 Avoid Conflicts of Interest

The Company respects the personal lives of its employees, while conflicts of interest arise when employees engage in activities that jeopardize corporate interests, or use the Company's resources and influence for personal benefits. Employees shall avoid any conflicts of interest. Some common conflicts of interest situations are set forth as follows:

5.1.1 No Assistance with Competitors

Assisting a competitor offering competing products or services is an apparent conflict of interest. Without the written consent of the Company, an employee shall not work part-time with a competitor, serve as a consultant or board member of a competitor, provide services in any form to a competitor, or provide information to a competitor.

5.1.2 No Competition with Trina

Employees and their family members shall not sell products or services that are in competition with the Company in any form. If an employee cannot determine whether the activities they are engaged in may constitute a conflict of interest, they shall seek advice of their direct supervisor or the Legal Department before carrying out such activities.

5.1.3 No part-time Work with Suppliers

Without the written approval of the responsible management, employees are prohibited from acting as a supplier or as a business representative of a supplier of the Company; working for a supplier of the Company; serving as an employee, consultant, director or shareholder of a supplier of the Company; accepting money or benefits of any kind for providing suppliers with advice or services related to the Company's business.

5.1.4 Do not inappropriately perform during working hours or use Company assets

Employees shall not perform any other work, which is irrelevant to their business duties and

responsibilities, during working hours, nor shall they use the Company's assets to perform any work irrelevant to their business duties and responsibilities.

5.1.5 No abuse of Company Influence

Employees shall not abuse their position with the Company to promote or assist their own or others' business activities. Without authorization or approval of the Company, an employee shall not engage in negotiating, contracting, bidding, guaranteeing in the name of the Company or its employee.

5.1.6 Management of Conflicts of Interest

Employees shall not have financial interests in organizations that have business dealings with or compete with the Company due to potential conflicts of interest with the Company. The aforementioned stakeholders include but are not limited to suppliers, competitors, customers, and distributors, etc.

In some cases, an employee's spouse or other person close to the employee is, or is employed by, a competitor or supplier of the Company. While everyone has the right to choose and develop a career, the above circumstances raise concerns of security, confidentiality and conflict of interest. Such close relationships may cause them to compromise unintentionally at the Company's expense.

If any of these situations occur, inform your direct supervisor to evaluate the situation and seek a solution. In some cases, either the employee or their family members may have to make a career change.

5.1.7 Disclosure of Conflicts of Interest

The Company requires full disclosure of any situation that can reasonably be expected to give rise to a conflict of interest. If an employee suspects that they have a conflict of interest, or have a situation that could reasonably be regarded as a conflict of interest by others, they can raise it through either the Company's reporting channel (email or online reporting platform) or the "Annual Conflict of Interest Self-Disclosure Questionnaire". Conflicts of interest will be referred to the managers in charge of monitoring, human resources and finance for consideration and decision on exemption.

5.2 No Insider Trading with Inside Information

Employees may have knowledge of inside information of the Company or other companies that is not yet made publicly available. An employee and their family members shall not use inside information to seek financial benefits as this is not only unethical behavior, but may also violate the law.

Employees and their family members shall not:

- Use inside information of the Company or any other company for financial benefits;
- Investing in someone else's name to circumvent insider trading rules;
- Divulge inside information to irrelevant stakeholders including employees of the Company.

5.3 Constraints on Personal Behaviors

5.3.1 Employees shall not have any personal behavior that violates the Code or may violate local laws, which may affect the reputation of the Company. In addition to obeying the laws, one should also understand and respect the local religious customs and avoid offending religious feelings.

5.3.2 Employees, who travel internationally, should understand and abide by the local laws and regulations on smuggling and contraband, and make sure they do not violate these rules. For example, in some countries, international travel with ivory, diamonds, animal fur, gold, etc. may lead to serious criminal liabilities.

6.0 Violation Report

Employees are obligated to report any known or suspected violations of the Code, including violations of laws, rules, regulations or policies. Reports identifying or suspected breaches of the Code will not be regarded as disloyalty, but as safeguarding the reputation and integrity of the Company and its employees.

If you know or suspect that someone in violation of the Code, you should immediately raise it through the Company's reporting channel (email or online reporting platform). The reported matter will be handled carefully by the authorized personnel. The Company will keep it confidential. Any act in violation of the Code will be punished accordingly, including warning, pay cuts, dismissal, civil compensation, or criminal charges.

Retaliation against the employee who reports known or suspected violations is strictly prohibited. The person taking an adverse action against the whistleblower is subject to penalties including termination of employment.

7.0 Immunity from Enforcement of the Code

Exemptions from the Code are granted on a case-by-case basis only in exceptional circumstances. Such exemption can only be made by the Board shall be immediately disclosed to the public.

8.0 Conclusion

The Code outlines general guidelines to conduct business in accordance with the highest standards of business ethics. If you have any questions about these guidelines, please contact us by email (IA@trinasolar.com) or by dialing the hotline (+86-519-85176933). The Company expects all employees to adhere to these standards and perform a wide range of inspections or examinations of business processes or internal control system to ensure compliance with ethics-related requirements. Each employee is responsible for their behaviors. No violation of the laws or the Code can be justified by instructions from a supervisor or other superior management. If you engage in acts prohibited by the laws or the Code, you will be deemed to have gone beyond the scope of your work duties and responsibilities. Your behavior will be punished accordingly, including termination of employment.

9.0 Update History

TSL-RC-007	V01	Release of New Version	Effective date: March 2, 2011
TSL-RC-007	V02	Updated as per Company operations	Effective date: January 25, 2019
TSC-RC-007	V03	Updated as per Company operations	Effective date: Nov 11, 2022

10.0 Supplementary Provisions

The Code shall be interpreted and updated by Internal Audit, and take effect on the date of publication upon approval by the managers in charge of monitoring and human resources.