

# Sungrow UK Modern Slavery Policy

## (Sungrow UK Statement on Slavery and Human Trafficking)

### 1. Preamble

- The purpose of this policy is to clearly communicate **Sungrow Power UK Ltd (“Sungrow”)**,’s commitment to preventing modern slavery in any form in accordance with the **Modern Slavery Act 2015** and other applicable laws. Sungrow is committed to conducting business fairly, ethically, and with respect for fundamental human rights. We are dedicated to preventing all forms of modern slavery within our own business and our supply chains. This policy applies to all employees, contractors, interns, and representatives of Sungrow, as well as anyone acting on behalf of the company, including third parties.

### 2. Definition

- **Modern slavery** encompasses slavery, forced or compulsory labour, servitude, human trafficking, and other forms of criminal activities in which people are controlled, deprived of their liberty and often subjected to financial or other forms of exploitation.
- Under the **Modern Slavery Act 2015**, modern slavery is a criminal offence, and Sungrow has a zero-tolerance approach to modern slavery in all its forms. We expect all those working with or on behalf of Sungrow to comply with the highest ethical standards and all applicable modern slavery laws.

### 3. Scope

This policy applies to

- All Sungrow employees, contractors, and interns, regardless of seniority or location.
- Anyone acting on behalf of or representing Sungrow, including self-employed workers, agency staff, and third parties such as suppliers and contractors.
- Sungrow encourages compliance with this policy among any third parties involved in our business, including business partners, suppliers, contractors, and clients.

### 4. Prevention Measures

- Sungrow conducts appropriate due diligence on employees, recruitment agencies, and suppliers to reduce the risk of modern slavery in our business operations, ensuring transparency and accountability.
- All employees receive written employment contracts and are paid in accordance with legal requirements. We comply with all legal obligations concerning health and safety, working hours, rest breaks, and holidays alongside the company’s **Health and Safety Policy** and **Equal Pay Policy**.

## 5. Training and Awareness

- Comprehensive Modern Slavery policy training is provided to all employees as part of their induction and ongoing development. Managers receive additional training on the implementation details of the policy, focusing on identifying and mitigating modern slavery risks.
- Suppliers are also required to undergo training on identifying and mitigating modern slavery risks, ensuring they understand and comply with Sungrow's ethical labour standards and Modern Slavery Policy.

## 6. Supplier Responsibilities

- Suppliers must conduct regular assessments of their business and supply chains and confirm compliance with modern slavery regulations.
- Suppliers must demonstrate their commitment to eradicating modern slavery and, where required, provide Sungrow with a copy of their anti-slavery policy.
- If a supplier is found to have modern slavery in their operations or knowingly within their supply chain, Sungrow may terminate contracts and take legal action.

## 7. Reporting Concerns and Whistleblowing

- If you have any concerns related to modern slavery, you must immediately report through Sungrow's whistleblowing channel. Under the Company's **Whistleblowing Policy**, reports can be made anonymously without fear of retaliation. Individuals who report concerns in good faith will not face retaliation or detrimental treatment, even if the investigation finds no wrongdoing. Sungrow is committed to protecting whistleblowers and ensuring a fair and transparent investigative process.

## 8. Breaches of Policy

- Sungrow takes any breach or suspected breach of this policy seriously. If any employee or individual working on our behalf is found to have engaged in modern slavery, disciplinary action will be taken, which may include dismissal, contract termination, or legal action. For external parties, this may result in the termination of the business relationship.

## 9. Risk Assessment and Due Diligence

- Sungrow implements a risk-based approach to modern slavery, proactively identifying high-risk areas within our supply chain and operations.
- Sungrow conducts regular supplier audits and assessments to ensure compliance with our ethical standards.
- Sungrow ensures that all supplier contracts include obligations requiring suppliers to adhere to modern slavery legislation and ethical labour standards.

## 10. Performance Monitoring and Continuous Improvement

- Sungrow tracks compliance performance through the key performance indicators (KPIs) including:
  - 1) Number of supplier audits conducted
  - 2) Compliance rates among suppliers
  - 3) Training completion rates for employees and suppliers

## 11. Remediation

- Sungrow will continue to monitor and review our policies relating to slavery and human trafficking. If we become aware of any breaches, we will investigate and take such steps as are necessary to ensure that the risk of further breaches occurring is minimised.

## 12. Policy Review

- This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2024. It is reviewed annually by our Compliance and Policy Department to ensure compliance with the latest legal requirements and best practices. It was approved by the director on 4 April 2025, and signed by the UK director, Jindong Li on 04-Mar-2025.

Date of Issue:04-Mar-2025

Approved By:   
Director of Sungrow Power UK Ltd