



Renewable Energy & Human Rights Benchmark 2025 Company Profile

Company name LONGi
Sub-sector Solar PV Manufacturer
Overall score 13% weighted average

Section score	Weighting	For section
29%	20%	1. UNGP core indicators
8%	40%	2. Salient human rights risks
0%	10%	3.a Response to risk of exposure to forced labour
N/A	10%	3.b Other serious allegations
N/A	20%	4. Low Carbon Transition assessment

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found [here](#).

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

Detailed assessment

1. UNGP core indicators based on the CHRB methodology (20% of total)

A. Policy commitments and governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company's human rights policy states: 'LONGi respects and supports human rights in all its value-creating business activities. Guided by the core values of 'Reliability, Value-add, and Fulfilment', LONGi spares no effort to advance the development of the photovoltaic industry. With respect and trust, LONGi joins hands with customers, employees, suppliers, and stakeholders to foster a healthy solar industry that makes the clean energy affordable for humankind. LONGi respects the UN Guiding Principles on Business and Human Rights (UNGPs) and the Ten Principles of the UN Global Compact, committing to respecting human rights in all its operations and value chains. LONGi's responsibilities in this regard encompass the internationally recognized human rights as enshrined in 'the International Bill of Human Rights', and the core labor rights defined in the ILO Declaration on Fundamental Principles and Rights at Work' [LONGi Human Rights Policy, 2024: static.longi.com] • Met: Commitment to UNGPs: The Company's human rights policy states: 'LONGi respects the UN Guiding Principles on Business and Human Rights (UNGPs) and the Ten Principles of the UN Global Compact, committing to respecting human rights in all its operations and value chains.' [LONGi Human Rights Policy, 2024: static.longi.com]
A.2	Commitment to respect the human rights of workers: ILO Declaration on	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to ILO core principles: The Company's Human Rights Policy states: 'LONGi's responsibilities in this regard encompass the internationally recognized human rights as enshrined in 'the International Bill of Human Rights', and the core labor rights defined in the ILO Declaration on Fundamental Principles and Rights at Work'. Although it includes commitments regarding, the different ILO

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Fundamental Principles and Rights at Work		<p>Core Principles, it indicates the following regarding freedom of association and collective bargaining: 'We respect employees' rights to freedom of assembly, association, lawful participation in unions, and collective bargaining in accordance with local laws'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under local law. During the engagement phase, the Company provided BHRRC with additional evidence regarding this sub-indicator, however the evidence was not material. [Human Rights Policy, 2024: static.longi.com]</p> <ul style="list-style-type: none"> • Not Met: Expects business relationships to commit to ILO core principles: The Company's Human Rights Policy states: 'We require suppliers to sign and strictly adhere to the Supplier CSR Code of Conduct, and communicate LONGi's human rights requirements to upstream suppliers. [...] we particularly require our suppliers to: Provide employees with safe, reliable, and hygienic working conditions and environments in accordance with the labor, safety, and health standards as required by the applicable laws; Prohibit forced labor and the employment of child labor, and not tolerate any forms of discrimination, harassment, or abuse, ensuring fair treatment for all employees; [...] Respect employees' rights to freedom of assembly, association, and collective bargaining in accordance with applicable laws' However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in accordance with applicable laws'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Human Rights Policy, 2024: static.longi.com]
A.3	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts • Met: Expects business relationships to make this commitment: The Company's Supplier Code of Conduct states: 'Suppliers shall also cooperate fully with the annual due diligence conducted by LONGi. LONGi also expects its suppliers/partners to conduct due diligence, implement appropriate mitigation and remediation measures based on the level of risk and impact, and transparently communicate the results of their due diligence findings to LONGi'. [Supplier Code of Conduct, 2024: static.longi.com] • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with business relationships on remedy: The Company indicates that: 'Suppliers shall also cooperate fully with the annual due diligence conducted by LONGi. LONGi also expects its suppliers/partners to conduct due diligence, implement appropriate mitigation and remediation measures based on the level of risk and impact, and transparently communicate the results of their due diligence findings to LONGi. Based on the findings of the due diligence results, LONGi may work with suppliers to develop and implement corrective action plans.' Based on the findings of the due diligence results, LONGi may work with suppliers to develop and implement corrective action plans.' However, this sub-indicator seeks evidence that the Company has a public commitment to work collaboratively with its business relationships to remedy adverse impacts which are directly linked to the Company's operations, products or services. [Supplier Code of Conduct, 2024: static.longi.com]
A.4	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: LONGi has established a board committee for ESG matters. Referring to the 2022 Sustainability Report, "In order to better fulfil LONGi's sustainable development goals and strengthen the company's ESG governance capabilities, we have revamped our ESG governance structure. We have developed a three-tier ESG governance structure covering the governance, management, and execution, with the Board of Directors serving as the highest decision-making body. We have also expanded the Strategy Committee to the Strategy and Sustainable Development Committee, which oversees and reviews the company's ESG practices. The Strategy and Sustainable Development Committee convene at least one time annually to bring ESG issues to discussions with the Board of Directors. The Board reviews the company's sustainable development strategy to secure consistency with our overall development strategy." [2022 LONGi Sustainability Report, 26/04/2023: static.longi.com] • Not Met: Describes HRs expertise of Board member • Not Met: Board member/CEO signal importance of HRs in their communications: Although the company submitted feedback for this datapoint, it does not provide evidence of discussion of why human rights matter to business or any challenges

Indicator Code	Indicator name	Score (out of 2)	Explanation
			faced in keeping respect with human rights. [Sustainable Procurement (website), N/A: longi.com] <ul style="list-style-type: none"> Not Met: CEO or board incentives
A.5	Responsible lobbying and political engagement fundamentals	1	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> Not Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach. Met: Monetary value of direct political contributions: The Company's 2023 Sustainability Report discloses: 'No direct or indirect political donations were engaged by the Company in 2023.' [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] Met: Monetary value of indirect political contributions: See above. [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)

B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> Not Met: Senior responsibility for HRs implementation and decision making: Although the company submitted feedback for this datapoint, the evidence was not considered material, as it referred to which organism formulated, approved and published the Company's Human Rights Policy. Not mention to senior management role(s) accountable for day-to-day implementation and decision making. [Human Rights Policy, 2024: static.longi.com] Not Met: Describes day-to-day responsibility for implementing HRs commitments Not Met: Day-to-day resources and expertise allocation in own operations Not Met: Resources and expertise allocation in supply chain: The Company provides a chart that shows hierarchy of supplier management mechanisms, including a Supply chain management centre in charge of a planning department and an execution department. However, no actual details found in relation to resources allocated (such as team composition, geographic allocation, specific human rights knowledge, collaboration between departments, etc.). It also provides a document on supplier management measures, although it does not provide details of the human resources devoted. [Sustainable Procurement (website), N/A: longi.com] & [Supplier CSR Management Measures, 2024: static.longi.com]
B.2	Identifying human rights risks and impacts	0.5	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> Not Met: Describes process of identifying risks in own operations: The Company indicates that: 'In 2024, LONGi formulated and issued the Measures for Management of Corporate Social Responsibility (CSR) of Suppliers, which incorporated due diligence requirements into the process of new suppliers access and managing qualified suppliers.'. However, this sub-indicator seeks evidence that describes the Company's process to identify its human rights risks and impact covering its own operations. [2024 Supplier Due Diligence Report, 2024: static.longi.com] Met: Describes process for identifying risks in business relationships: The company has established a professional due diligence team comprising internal and external experts in human rights, environmental, CSR, and compliance fields. The due diligence methodology includes management interviews, document review (suppliers policies, systems and records), employee interviews, site visits, audits and third party screening tools such as 'China Judgment Network, IPE Search, Credit China, National Enterprise Credit Information Publicity System, etc., as an auxiliary means to identify, assess and verify the human rights and environmental risks of suppliers'. [2024 Supplier Due Diligence Report, 2024: static.longi.com] Not Met: Describes risk identification system incl. stakeholder consultation: The Company indicates that 'The company has established a professional due diligence team comprising internal and external experts in human rights, environmental, CSR, and compliance fields'. However, it seems that the process and team focuses exclusively in the supply chain. [2024 Supplier Due Diligence Report, 2024: static.longi.com] Not Met: Describes how risk identification system is triggered by new circumstances
B.3	Assessing human rights	1	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> Not Met: Describes assessment process and discloses salient HRs risks: Although the company submitted feedback for this datapoint, the evidence was not

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impacts		<p>considered material, is it refers to supply chain. [2024 Supplier Due Diligence Report, 2024: static.longi.com]</p> <ul style="list-style-type: none"> • Met: Describes how process applies to supply chain: The 2024 Supplier Due Diligence Report discloses: 'The company has established a professional due diligence team comprising internal and external experts in human rights, environmental, CSR, and compliance fields. The team assesses suppliers' human rights and environmental risks through various methods, including document reviews [including country-risk related reports], on-site inspections, interviews with management and employees, and independent third-party audits'. The Company elaborates on the details of each of these measures. [2024 Supplier Due Diligence Report, 2024: static.longi.com] • Not Met: Public disclosure of results of HRs risk assessment: Although the Company discloses de results of the due diligence process, indicating that: 'During 2024 due diligence process, we identified no instances of severe human rights violations among our suppliers, such as the use of child labor, forced labor, restriction of employees' personal freedom, or acts of violence, abuse, physical punishment, or sexual harassment'. It is not clear which are the issues that it considers to be salient, even if it didn't find violations during last reporting year. Also, evidence refers to suppliers, not clear which are the issues for own operations. [2024 Supplier Due Diligence Report, 2024: static.longi.com] • Met: Describes how assessment involved affected stakeholders: At least in relation to suppliers, the Company indicates that it conducts employee interviews: 'Interview supplier employees in their native language in the absence of vendor managers or cameras to confirm that our observations match their experience'. [2024 Supplier Due Diligence Report, 2024: static.longi.com]
B.4	Integrating and acting on human rights risks and impact assessments	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Company's Human Rights Policy states: 'Through human rights due diligence, we identify, assess, prevent, and mitigate human rights risks in our business activities and value chains.' However, no evidence was found describing the Company's system to prevent, mitigate and remediate human rights issues as part of its human rights due diligence process. [Human Rights Policy, 2024: static.longi.com] • Not Met: Describes how global system applies to supply chain: The Company has provided feedback for this datapoint. However, it is not clear what part it expects to be taken into consideration, as it consists in a full document without clarification. [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] • Met: Example of actions decided on at least 1 salient HRs issue: In relation to occupational health and safety, issues identified included problems with fire-fighting equipment, chemicals not properly labelled, not proper management of canteen food or lack of private lockers in dormitories. In relation to these matters, the response includes: Implementing regular spot checks of fire-fighting equipment, improving the management requirements of chemicals MSDS (Material Safety Data Sheet), and standardise the management of raw and cooked food and the configuration of private lockers. [2024 Supplier Due Diligence Report, 2024: static.longi.com] • Not Met: Describes how stakeholders involved in decisions about actions taken: Although the company submitted feedback for this datapoint, the evidence was not considered material, it is not clear how affected stakeholders are actually involved in discussions in relation to actions to be implemented to address salient issues. [2024 Supplier Due Diligence Report, 2024: static.longi.com]
B.5	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions: Although the company submitted feedback for this datapoint, the evidence was not considered material. • Not Met: Example of lessons learned from evaluation effectiveness of actions • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.6	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides one example of comms with stakeholders • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company's Human Rights Policy states: 'We have opened channels to communicate and complain human rights concerns [...] We establish smooth communication channels to create an organizational atmosphere where expressing oneself is free from pressure. Employees can express their opinions or raise concerns through designated email addresses or platforms to jointly address issues in the workplace.' Furthermore, the document shares: 'Email for compliance consulting and supply chain due diligence: compliance@longi.com; Email of the Supervisory Department for complaints: audit@longi.com; Complaints and Reporting Hotline: +86-29-84193391' [Human Rights Policy, 2024: static.longi.com] • Not Met: Grievance mechanism available in appropriate languages and workers made aware: Although the company submitted feedback for this datapoint, the evidence was not considered material, as it does not directly address grievance mechanisms. • Met: Describes how workers in supply chain access grievance mechanism: The Company's Human Rights Policy states: 'We provide smooth communication and complaint reporting mechanisms to safeguard human rights. Employees, suppliers, partners, customers, and other stakeholders can anonymously or openly report human rights concerns to our compliance department or supervisory department through telephone calls, emails, mailbox, or other channels.' [Human Rights Policy, 2024: static.longi.com] • Not Met: Expects business relationships to convey expectation to their business relationships: See above. However, it is not clear if these include suppliers' employees beyond first tier. The supplier code states that 'Suppliers shall provide employees with a smooth and secure anonymous complaint or reporting mechanism for complaints or reports of violations of this Code found in the course of their work'. However, no evidence found requiring to cascade the code down the supply chain. [Human Rights Policy, 2024: static.longi.com] & [Supplier Code of Conduct, 2024: static.longi.com]
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The Company's Human Rights Policy states: 'We provide smooth communication and complaint reporting mechanisms to safeguard human rights. Employees, suppliers, partners, customers, and other stakeholders can anonymously or openly report human rights concerns to our Email for compliance consulting and supply chain due diligence: compliance@longi.com; Email of the Supervisory Department for complaints: audit@longi.com; Complaints and Reporting Hotline: +86-29-84193391' [Human Rights Policy, 2024: static.longi.com] • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: Although the company submitted feedback for this datapoint, the evidence was not considered material, as it does not address how Company's external stakeholders are actively aware of the mechanisms in local languages. [Human Rights Policy, 2024: static.longi.com] & [Code of Business Conduct, 2024: static.longi.com] • Met: Describes how external individuals/communities access grievance mechanism: See above. Stakeholders also can report in relation to supply chain. In future assessments the Company will be expected to demonstrate this applies to all business relationships. • Not Met: Expects business relationships to convey expectation to their business relationships: The Company has provided feedback for this datapoint. However, it is not clear what part it expects to be taken into consideration, as it consists in a full document without clarification. The document does not address this issue directly. [Human Rights Policy, 2024: static.longi.com]
C.3	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts: The Company's website declares: 'During the reporting period, LONGi conducted 28 on-site supplier audits, did not finding any violation of child labor or forced labor; other findings were closed under LONGi's coach and monitoring.' Additionally, the Company's Human Rights Policy states: 'Once we spot any adverse impact on human rights in our operation activities, we will promptly and actively take or collaborate in taking remedial measures [...] We prohibit the use of child labor, take measure to prevent any recruitment or use of child labor, and put in place mechanisms and measures to remedy child labor.' However, no evidence was found describing the approach the Company would take to provide or enable a timely remedy to victims of adverse human rights impacts, whether caused or contributed to by the Company. Although the company submitted feedback for this

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>datapoint, the evidence was not material as it referred to the grievance mechanism and not actual approach or example of remedy provision for victim(s) [Supplier Collaboration and Empowerment (website), N/A: longi.com] & [Human Rights Policy, 2024: static.longi.com]</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts: LONGi's 2023 sustainability report discloses that as a result of its CSR due diligence (for its suppliers), it found that some employees in its supply chain 'bear the pre-employment medical examination fee' and as a corrective action the Company requires that the employer bears the medical examination fee incurred by the employee due to employment.' However, this sub-indicator looks for evidence that the Company when contributed to or caused human rights adverse impacts makes changes to systems, processes and practices to prevent similar adverse impacts in the future. Although the company submitted feedback for this datapoint, the evidence was not considered material as it provided information of proactive corrective action plan(s) rather than actual changes following remedy provision. [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] • Not Met: Describes approach to monitoring/implementing agreed remedy: Although the company submitted feedback for this datapoint, the evidence was not considered material as it refers to corrective action plans rather on following up on implementation agreed remedy for affected people.

2. Salient human rights risks (40% of total)

D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.M	Commitment to respect indigenous peoples' rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Expectation of project developer clients to have a public commitment to respect indigenous rights: The Company's Code of Conduct states: 'We staunchly advocate for the promotion and safeguarding of the fundamental human rights and freedoms of Indigenous community members, adhering strictly to the principles outlined in the United Nations Declaration on the Rights of Indigenous Peoples'. Furthermore, the Company's Code of Conduct for Suppliers states: 'Suppliers shall not unlawfully evict indigenous populations and occupy land and forests, and shall not restrict access to water resources for indigenous populations who depend on them. Consultations must be held with all affected parties.' However, no evidence was found that the Company expects its project developer clients to have a public commitment to respect indigenous people's rights. The Company also indicates that: 'Furthermore, we expect our suppliers and partners to develop and implement similar policies while complying with this policy [...] We respect the legitimate rights of local residents in the communities where we operate, encourage localized employment and procurement, support the livelihoods of local community residents (specific groups in particular, such as children, the disabled, indigenous peoples, minorities, etc.), respect and embrace cultural diversity, and help local residents benefit from economic, social, and cultural development.' Nevertheless, it remains unclear whether the Company expects its project developer clients to have a public commitment to respect indigenous people's rights in line with international law and standards. [Code of Business Conduct, 2024: static.longi.com] & [Code of Conduct for LONGi Suppliers (website), N/A: longi.com] • Not Met: Commitment to only work with business partners that respect FPIC
D.2.M	Engagement with all affected communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes how local communities identified and engaged in the last two years: Although the company submitted feedback for this datapoint, the evidence was not considered material. It refers to transnational training and not about the Company identifying and engaging with affected communities, in the last two years on potential impacts related to the operational phase of the project the manufacturer is involved in. • Not Met: Provides two examples of engagement with communities: The Company's 2023 Sustainability Report discloses: 'Since 2022, LONGi has launched the construction of the Serendah Module Plant at the UMW High-Value Manufacturing Park in Selangor, Malaysia. In order to obviate, minimize, or cushion the negative impacts of the construction process on the communities nearby, we have formulated a corresponding policy based on thorough negotiations with the community residents to ensure that the project would be carried out in compliance with both the local regulations in Malaysia and the park requirements for environmental and social responsibilities.' No further examples were found. Although the company submitted feedback for this datapoint, the evidence was not

Indicator Code	Indicator name	Score (out of 2)	Explanation
			considered material. [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] <ul style="list-style-type: none"> • Not Met: Examples of engagement refer to marginalised groups and provide additional detail • Not Met: The company meets B2.C, B3.D, B4.D and B.5.C
D.3.M	Benefit and ownership sharing policy	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Rewards for clients that have a commitment to identify potential benefit and ownership sharing • Not Met: Rewards for clients for disclosing statistics for each project (demographics of ownership sharing)
D.4.M	Local wind & solar energy access, affordability	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Actions taken to support access and affordability of renewable energy in the value chain: The Company has outlined its donations and affordability campaigns in various locations in the 2022 Sustainability Report. However, it remains unclear if the beneficiaries are the ones affected by the Company's operations. For example, in the 2022 Sustainability Report, "Lighting Africa — LONGi photovoltaic donation project in Malawi: At the beginning of 2022, LONGi established an African Representative Office to supply 16 countries in Africa, with goods shipped to 15 seaports in Africa. During our operations, we noticed the unbalanced economic development of various African regions. A large portion of the population was still living in areas without electricity. Although gas and coal power generation still dominate the African electricity market, the development of the PV industry will bring significant social and economic value to African countries as the cost of PV technology lowers down. On September 2, 2022, LONGi and A.P. Moller-Maersk (Maersk), the leading global integrated container logistics company, jointly held the launching ceremony of a donation project for the African country of Malawi in Shanghai. In virtue of this donation project, we would continue to make donations, helping residents in areas without electricity in Africa obtain clean energy, and improve the medical care, education, and living standards of local residents. The 301kW high-efficiency photovoltaic modules donated by LONGi and shipped by Maersk were successively sent to 12 destinations in Africa, including hospitals, clinics, schools and villages to generate electricity and irrigate farmland. With concrete actions, we facilitate infrastructure construction in Africa and help promote low-carbon development in the region." Additionally, the 2021 Sustainability Report indicates that "[b]y December 2021, more than 30 projects we have provided support for PV module and PV power station projects in poverty-stricken communities around the globe". Although the company submitted feedback for this datapoint, the evidence was not considered material. It provided four different pieces of evidence, but none refers specifically to supporting access and affordability in communities in the value chain. Evidence refers to actions in COP 28, Supply chain due diligence awareness, promoting energy equity, etc. [2022 LONGi Sustainability Report, 26/04/2023: static.longi.com] & [2021 LONGi Sustainability Report, 24/04/2022: static.longi.com] • Not Met: Public support for government policies addressing energy access: Although the company submitted feedback for this datapoint, the evidence was not considered material. One of the pieces had no direct relation with actions supporting access and affordable energy in the value chain and the other does not refer to a context of support of government policies addressing energy access. • Not Met: Including a timebound action plan and reporting targets on supporting energy access and affordability in consultation with communities

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.M	Respect for land and natural resource tenure rights	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Expectation for clients to have commitment to respect land ownership/natural resources as in VGGT • Not Met: Steps taken to use leverage to resolve land rights issues
E.2.M	Just and fair physical and economic displacement policy implementation including free, prior and	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Expectations for clients to commit to IFC PS 5 for physical and economic displacements • Not Met: Steps taken to use leverage

Indicator Code	Indicator name	Score (out of 2)	Explanation
	informed consent		

F. Security and conflict-affected areas

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.M	Operating in or sourcing from conflict-affected areas	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to heightened HRDD in conflict affected areas: No general policy statement committing the Company to addressing heightened human risks in conflict or high risk areas. The Company has however outlined its conflict minerals approach. According to the 2022 Sustainability Report, "Prevention of Controversial Procurement Risks: To effectively level up measures for controversial procurement, the CSR Code of Conduct of LONGi Suppliers stipulates that we do not purchase, use, or sell conflict minerals and clearly defines what "conflict minerals*" stand for. Meanwhile, LONGi conducts due diligence audits on the origin of all raw materials throughout its supply chain, covering production and sales links such as self-owned factories, contract manufacturers, and distributors, to ensure that there exist no conflict minerals in the supply chain. To ensure that the review mechanisms of relevant parties should be qualified, LONGi regulates that the "Measures and Results of Supplier Investigation" should include manufacturing raw materials such as materials, parts, components, sub-assemblies, and finished products (contract manufacturing or transportation). Going forward, we will strength our efforts to enhance the management system of controversial raw materials procurement, further improve the supplier traceability and audit mechanisms for raw material origins, and conduct supplier audit training to rigorously avert issues with controversial raw material procurement." [2022 LONGi Sustainability Report, 26/04/2023: static.longi.com] • Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens: See above. Only applicable in conflict minerals cases. Although the company submitted feedback for this datapoint, the evidence was not considered material, as it's the conflict minerals policy. Conflict minerals are assessed in their own dedicated indicators. • Not Met: How stakeholders are involved in the process to mitigate risks
F.2.M	Evidence of security provider human rights assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Description of implementation of security approach and example • Not Met: Description of monitoring of business partners: The Company's Code of Conduct for Suppliers states: 'Suppliers shall not use private or public security forces that would result in torture, inhuman or degrading treatment, bodily harm or restriction of freedom of association. Suppliers shall ensure that all security personnel (including contract security personnel) respect the human rights and dignity of all persons and use reasonable force when threatened that does not exceed the level of the proportionate threat'. However, this sub-indicator looks for evidence that the Company expects business partners in its value chain (upstream mineral suppliers) to describe how it implements its security approach and provide an example of how it ensures respect for human rights in the course of maintaining the security of company managed operations, including when working with contracted private or public security providers. [Supplier Code of Conduct, 2024: static.longi.com] • Not Met: Local communities engaged in assessment of security • Not Met: Example of working with community on this issue

G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.M	Responsible sourcing of minerals: arrangements with suppliers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Policy statement on OECD Guidance aligned due diligence: The Company's Conflict Minerals Procurement Policy states: 'We hereby commit to developing and implementing compliance management procedures for conflict minerals supply chain in accordance with the Chinese Due Diligence Guidelines for Mineral Supply Chains issued by the China Chamber of Commerce for Metals, Minerals and Chemicals Importers and Exporters (CCCMC), with reference to the essences and standards of the OECD Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict-Affected and High-Risk Areas (third edition) (OECD Guidance)'. However, 'with reference to the essences' is not considered a formal statement of commitment under the current methodology. Although the company submitted feedback for this datapoint, the evidence was not considered material, as this subindicator looks for a policy statement, placed in policy documents, not in sustainability reports. [Conflict Minerals Procurement Policy, 2024: static.longi.com] • Not Met: The policy explicitly covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Policy expectations of business relationships: The Company's Conflict Minerals Procurement Policy states: 'As a fundamental principle in the management of conflict minerals, we undertake not to procure or use products and raw materials containing conflict minerals that directly or indirectly finance armed groups in conflict-affected and high-risk areas or contribute to conflict and human rights violations, and we demand all suppliers the equal commitment to due diligence. LONGi incorporates this requirement into its contracts and/or agreements with suppliers.' However, this expectation does not mention the OECD Guidance. [Conflict Minerals Procurement Policy, 2024: static.longi.com] • Not Met: Contractual requirement for smelters/refiners to follow OECD: See above.
G.2.M	Responsible sourcing of minerals: mapping and disclosing the supply chain	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Identification and mapping of suppliers: The Company's 2023 Sustainability Report states: 'Following the five-step due diligence framework of the Organisation for Economic Co-operation and Development (OECD), LONGi covers the supply chains of all productive materials across the group. We require direct suppliers to complete the Conflict Minerals Reporting Template (CMRT) issued by the Responsible Minerals Initiative (RMI), applicable to 3TG minerals, to identify upstream smelters or refineries and their RMAP certification results. In 2023, LONGi achieved a 100% completion rate for conflict mineral due diligence surveys of suppliers containing 3TG. All six smelters upstream of the 13 suppliers of tin-containing materials across the Group have obtained the RMAP certification and are not involved with conflict-affected and high-risk areas. In 2024, LONGi formulated the Conflict Minerals Supply Chain Compliance Management Measures, continuing to refine the standard methodology and procedural guidelines for identifying 3TG materials, conducting supply chain surveys, risk assessments, and tiered supply chain controls.' [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] • Met: Traceability system for mineral supply chain: The Company's 2023 Sustainability Report states: 'LONGi has always upheld meticulous traceability management with a rigorous attitude, establishing a traceability system that runs through the entire business process. This system ensures a scalable and routine coding management system from raw materials to products, guaranteeing reliable sources and premium quality of raw materials. We have formulated the Quality Control Business Management Standards and the Supply Chain Traceability Management System Manual. We collaborate with suppliers capable of traceability and who meet traceability regulations, effectively ensuring the safety and traceability of product quality. LONGi has also set up a digital traceability system that enables full chain traceability, from components to silicon mines, using a series of key production and sales information, such as module box numbers, module pallet numbers, cell batch numbers, monocrystalline identification, and silicon material order numbers. Our traceability system has passed audits by the U.S. Customs and Border Protection (CBP) and the Canada Border Services Agency (CBSA) and is capable of customs practices. The traceability system has received high recognition and evaluation from domestic and international customers and third-party institutions multiple times.' [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] • Not Met: Discloses smelters/refiners that are most significant part of supply chain • Not Met: Suppliers in higher risk activities, geographies, products
G.3.M	Responsible sourcing of minerals: risk identification in mineral supply chains	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and prioritising of risks in supply chain: The Company's website discloses: 'Following the five-step due diligence framework of the Organisation for Economic Cooperation and Development (OECD), LONGi covers the supply chains of all productive materials across the group. We require direct suppliers to complete the Conflict Minerals Reporting Template (CMRT) issued by the Responsible Minerals Initiative (RMI), applicable to 3TG minerals, to identify upstream smelters or refineries and their RMAP certification results. In 2023, LONGi achieved a 100% completion rate for conflict mineral due diligence surveys of suppliers containing 3TG. All six smelters upstream of the 13 suppliers of tin-containing materials across the Group have obtained the RMAP certification and are not involved with conflict-affected and high-risk areas. In 2024, LONGi formulated the Conflict Minerals Supply Chain Compliance Management Measures, continuing to refine the standard methodology and procedural guidelines for identifying 3TG materials, conducting supply chain surveys, risk assessments, and tiered supply chain controls'. It, however, does not disclose risks identified. [Responsible Mineral Management (website), N/A: longi.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Description of process to identify smelters/refiners and whether they carry out DD: The Company's website discloses: 'In accordance with the OECD five-step approach, direct suppliers should complete the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT for 3TG) questionnaire, identify upstream smelters/refineries and their RMAP certification results. Direct suppliers shall continuously monitor and improve to ensure that upstream smelters containing 3TG materials comply with RMAP certification. If 3TG material upstream smelter or refinery does not meet the RMAP certification, but the origin is not specified countries/conflict-affected and high-risk areas, LONGi will continue to cooperate, and the suppliers need to promote the upstream smelter or refinery through RMAP certification within 6 months; If the upstream smelter or refinery of 3TG materials does not meet the RMAP certification, and the origin is in the specified country/conflict-affected and high-risk area or the origin of 3TG cannot be identified, LONGi will suspend the cooperation, and the supplier shall conduct its own responsible mineral audit, including but not limited to onsite audit, independent third-party audit, etc. The supplier should urge upstream smelters or refineries to meet RMAP certification or equivalent standards within six months. If no improvement is achieved, LONGi will initiate a supplier replacement or exit procedure.' [Responsible Mineral Management (website), N/A: longi.com] • Not Met: Disclosure of qualified smelters/refiners: The Company's websites reports that 'In 2023, LONGi achieved a 100% completion rate for conflict mineral due diligence surveys of suppliers containing 3TG. All six smelters upstream of the 13 suppliers of tin-containing materials across the Group have obtained the RMAP certification and are not involved with conflict-affected and high-risk areas.'. However, this sub-indicator seeks evidence that the Company discloses a list of all qualified smelters/refiners across its value chain, covering all minerals. [Responsible Mineral Management (website), N/A: longi.com] • Not Met: Processes cover minerals assessed as highest risk

H. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.M	Commitment to respect the rights of human rights and environmental defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expectation on business partners in value chain to make this commitment • Not Met: Description of how working with HRDs as part of risk assessment and DD: Although the company submitted feedback for this datapoint, the evidence was not considered material, as it does not contain any reference to human right defenders. • Not Met: Description of how working with HRDs to create safe and enabling environment: Although the company submitted feedback for this datapoint, the evidence was not considered material, as it does not contain any reference to human right defenders.

I. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.M	Health and safety	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Discloses quantitative information on H&S in own operations (injury rate or lost days and fatalities) in last reporting period: The Sustainability Report outlines the injury rates and days off absence due to work-related injuries in a table format. Criterion is not met as there is no quantitative information relating to fatalities. During the engagement phase, the Company provided BHRRC with additional evidence regarding this sub-indicator, however, the evidence was not material, as it refers to recordable incident rates. [2022 LONGi Sustainability Report, 26/04/2023: static.longi.com] & [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] • Not Met: Expects disclosure of H&S information of relevant business relationships: The Supplier Social Responsibility Instruction states: 'Suppliers are encouraged to disclose quantitative information related to worker health and safety, including injury rates, days lost from work, and accidental deaths.' However, it is not clear if this is a requirement or a recommendation. The Company also indicates that 'Suppliers shall ensure that they comply with all applicable occupational health and safety related laws, regulations and standards in the country or region where their business is operated as well as occupational health and safety related clauses agreed in the contract throughout their operations, and provide and maintain a healthy, safe and reliable working condition and working environment for employees'. However, it does not clarify whether suppliers are required to report performance data on health and safety performance. [Supplier

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Social Responsibility Instruction, 2024: static.longi.com] & [Supplier Code of Conduct, 2024: static.longi.com]</p> <ul style="list-style-type: none"> • Not Met: Targets for H&S performance (including injury rates or lost days and fatalities): The Sustainability Report indicates that "LONGi sets annual occupational health and safety management goals and makes implementation projects." However, the goals are not disclosed. [2022 LONGi Sustainability Report, 26/04/2023: static.longi.com] & [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] • Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: The Company's 2023 Sustainability Report states: 'To effectively manage occupational health and safety risks in the production and manufacturing process, we engaged all employees in the identification and assessment of safety hazards, thus ensuring that risks in all steps, including engineering, silicon wafers, batteries, PV modules, and power plants are identified and controlled. Moreover, we instructed frontline teams to carry out risk control, emergency drills, examinations, and training to prevent accidents and incidents from happening.' [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com]
I.2.M	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions • Not Met: Capacity building with suppliers: The Company indicates that 'In 2023, we launched the Supplier ESG Capacity Building Plan (2024-2028). Significant suppliers involving in this plan accounted for 55%2 of the total procurement expenditure of significant suppliers, and we plan to gradually increase this proportion to 80% during 2025-2028. We have established four key dimensions: compliance with social responsibility qualifications, management systems, labor rights, and EHS management capabilities, aiming to enhance our suppliers' ESG capability. Through the implementation of this plan, we aspire to encourage suppliers to proactively practice ESG management and establish a sustainable procurement system'. However, no evidence was found that capacity building to enable suppliers to cascade down through their supply chains of policies to address forced labour. [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] • Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: The Company's 2023 Sustainability Report states: 'In 2023, we launched the Supplier ESG Capacity Building Plan (2024-2028). Significant suppliers involving in this plan accounted for 55% of the total procurement expenditure of significant suppliers, and we plan to gradually increase this proportion to 80% during 2025-2028. We have established four key dimensions: compliance with social responsibility qualifications, management systems, labor rights, and EHS management capabilities, aiming to enhance our suppliers' ESG capability. Through the implementation of this plan, we aspire to encourage suppliers to proactively practice ESG management and establish a sustainable procurement system. 'Additionally, the document states that forced labour is included under labour rights. No details were found, however, of work conducted within its own operations. Although the company submitted feedback for this datapoint, the evidence was not considered material, as it didn't refer to capacity building including own operations. [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] • Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement: The Company's 2023 Sustainability Report states: 'We require module suppliers (tier 1), component suppliers (tier 2), and key raw material suppliers (tier 3) to adhere to the core conventions and fair provisions of the International Labour Organization (ILO) [...] Suppliers are screened based on their performance in labor management, and we conduct annual CSR due diligence surveys on suppliers, setting ESG scorecards for incoming suppliers. Suppliers involved in labor rights issues such as child and forced labor shall take prompt actions to rectify within a time limit or termination of cooperation.' However, no information was found on the factors it would consider when deciding whether to end the business relationship if it is not able to adequately use leverage to prevent or mitigate adverse impacts, in the context of forced labour risk management (i.e. relevancy of the supplier, responsible exit). [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.3.M	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Employer Pays Principle in policy for own ops and supply chain: The Company's Code of Business Conduct states: 'We do not retain employee identification documents or impose any form of deposit requirement, nor do we request employees to pay recruitment fees to our company's agents or sub-agents.' The Suppliers Code of Conduct states: 'Suppliers shall not use prison labor, require candidates to pay recruitment fees for employment'. However, no evidence was found indicating that the Company commits to reimbursing employees in cases where recruitment fees have been paid. [Code of Business Conduct, 2024: static.longi.com] & [Supplier Code of Conduct, 2024: static.longi.com] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time • Not Met: Description of implementation and monitoring of this practice • Not Met: Requirements on paying in full and on time in supplier codes and contracts: The Suppliers Code of Conduct states: 'Suppliers shall not withhold or default on employees' wages. 'No evidence that the Company requires its suppliers to pay their employees both in full and on time were found. [Supplier Code of Conduct, 2024: static.longi.com]
I.4.M	Prohibition of forced labour: Restrictions on workers	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Requirements on free movement in supplier codes and contracts and own operations: The Code of Business Conduct states: 'We do not retain employee identification documents or impose any form of deposit requirement [...]' Employees are entitled to reasonable freedom of movement within the workplace and access to company-provided worker dormitories or living areas (where applicable), without undue restrictions.' Additionally, the Company's Suppliers Code of Conduct states: 'Suppliers shall not use prison labor, require candidates to pay recruitment fees for employment, recruit or accept people for work by violence, threats, fraud, withholding documents or personal valuables (ID cards, passports, work permits, etc.), or collecting deposits or bonds. Suppliers cannot place unreasonable restrictions on employees leaving the company premises.' [Code of Business Conduct, 2024: static.longi.com] & [Supplier Code of Conduct, 2024: static.longi.com] • Not Met: Describes working with suppliers on free movement of workers • Not Met: Description of implementation and monitoring of this practice
I.5.M	Freedom of association and collective bargaining	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Company's Code of Business Conduct states: 'We also respect the right of assembly, the freedom of association, and the right to join labor unions in accordance with the applicable laws.' The Suppliers Code of Conduct states: 'Suppliers shall recognize and respect employees' rights to freedom of assembly and association, to organize, to form unions and to engage in collective bargaining in accordance with all applicable laws and regulations in the country or region where their business is operated'. However, it is not clear whether it expects its suppliers to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions on the exercise of these rights), as the Company indicates that it respects these rights 'in accordance with all applicable law/ in accordance with all applicable laws and regulations in the country or region'. Furthermore, no evidence of measures in place to prevent harassment or retaliation was found. Although the company submitted feedback for this datapoint, the evidence was not considered material, as it didn't refer to the missing element(s) of the subindicator. [Code of Business Conduct, 2024: static.longi.com] & [Supplier Code of Conduct, 2024: static.longi.com] • Not Met: Describes work with suppliers on FoA/CB: No specific mention of support in relation to freedom of association/collective bargaining. However, the 2022 Sustainability Report outlines the steps taken in supply chain due diligence and the training provided: "In 2022, we initiated a supplier due diligence investigation for the first time, assessing suppliers' environmental and social performance from nine aspects: employment, labour protection, union freedom and collective bargaining, fair treatment, working hours and wages, occupational health and safety, supply chain management and traceability, environmental protection, legal compliance, and fair competition. To assist suppliers in completing the questionnaire, LONGi provided training and guidance to answer the questions. By the end of the reporting period, LONGi had conducted enterprise-wise sustainable development due diligence investigations on all suppliers and rectified all identified issues." Although the company submitted feedback for this datapoint, the evidence was not considered material, as it's the supplier code. [2022 LONGi

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Sustainability Report, 26/04/2023: static.longi.com] & [Supplier Code of Conduct, 2024: static.longi.com]</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain: Although the company submitted feedback for this datapoint, the evidence was not considered material, as it's the supplier code. • Not Met: Global Framework Agreement
I.6.M	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: The supplier code states that 'The wages paid by suppliers to their employees shall not be lower than the local statutory minimum wage standard, overtime shall be paid in accordance with the standards stipulated in the labor regulations of the country or region where their business is operated, and Suppliers shall not withhold or default on employees' wages'. No reference was found to living wage. [Supplier Code of Conduct, 2024: static.longi.com] • Not Met: Describes work with suppliers on living wage: Although the company submitted feedback for this datapoint, the evidence was not considered material, it consists in the supplier code, which does not contain actual work conducted to improve performance on living wage. [Supplier Code of Conduct, 2024: static.longi.com] • Not Met: Description of process to determine living wages with unions: The Company indicates that: 'LONGi formulated the Compensation Management Measures to ensure compliance, fairness, and justification of the compensation system, guaranteeing equal pay for equal work. In 2023, recognizing the difference between Chinese and international markets, we iterated our internal policies and compensation system. This included establishing a differentiated incentive policy framework, applying varying operational metrics depending on job functions, and leveraging a differentiated distribution strategy. Our compensation package encompasses fixed pay, allowances and corporate profit-sharing, incentive bonuses, and long-term incentives'. However this appears to refer exclusively to Management compensation. In addition, no evidence found of a process to determine living wage for different locations including dialogue with trade unions (or equivalent worker bodies). [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com]

J. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.M	Environmental impact assessment and remediation	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Expectation for business partners to conduct EIA: The Company's Suppliers Code of Conduct states: 'Suppliers shall ensure that all new, renovation and expansion projects have passed environmental impact assessment and acceptance, and that pollutant discharge meets the requirements of the discharge license and is in compliance with the standards.' [Supplier Code of Conduct, 2024: static.longi.com] • Not Met: Expectation for business partners to publish EIA • Not Met: Expectation for business partners to explain CIA
J.2.M	Life cycle assessment	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Conducts regular public life cycle assessments: According to the 2022 Climate Action White Paper of LONGi, "LONGi Hi-MO 5 modules have obtained the world's first IEC/TS 62994 certificate issued by TÜV Rheinland. This certification comprises two parts, EHRA (Environment Health Risk Assessment) and LCA (Life Cycle Assessment), a systematic evaluation of the full process of PV product manufacturing, end-use, recycling, waste disposal and health-safety-environment risk assessment, etc. IEC/TS 62994 certificate is deemed as the approval of LONGi Hi-MO 5 PV modules in terms of health, safety and green & low-carbon development, helping clients achieve energy transition in a healthier and greener way. LCA refers to life cycle assessment of the complete process covering raw material extraction, production, product use, recycle, reuse and waste disposal, based on the life cycle assessment methods and requirements of ISO14040/ISO14044, which is used to clearly calculate and evaluate the product impact on environment through a top-down estimation." [2022 Climate Action White Paper of LONGi, 11/2022: static.longi.com] • Not Met: Reports on progress made on action plan

K. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.M	Anti-corruption due diligence and reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to prohibiting bribes to public officials: The Company's Code of Business Conduct states: 'We do not tolerate any form of bribery, whether it be directly or indirectly offering, promising, giving, or authorizing the giving of money or any other valuable item to any individual in public or private sectors to improperly influence the recipient's fair performance of duties or decision-making for facilitating transactions or obtaining, retaining, or conducting other improper benefits in business or commercial activities. Bribery includes but is not limited to providing cash, securities, travel or entertainment, excessive gifts or hospitality, paying commissions or kickbacks disproportionate to the services provided, making donations to charities related to government officials or clients in violation of regulations, donating to charities at the request of government officials or clients, or providing any other valuable items or services. Any fraud practice taking advantage of job privileges is not allowed. It is forbidden to seek illegitimate benefits for oneself or for others by means of deceit or cover-up'. However, this sub-indicator seeks evidence that this commitment also explicitly considers acts of bribery or corruption involving public officials as well as through business intermediaries. During the engagement phase, the Company provided BHRRC with additional evidence regarding this sub-indicator, however, the evidence was not material. [Code of Business Conduct, 2024: static.longi.com] • Not Met: Expectation extends to relevant business relationships: The Suppliers Code of Conduct states: 'Suppliers must conduct their business in full compliance with all applicable anti-bribery, anti-money laundering and anti-tax evasion national and international laws in the countries or regions in which they operate. At the same time, Suppliers must not tolerate any form of corruption or bribery by their employees, third parties or intermediaries, nor engage in any form of corruption or bribery'. However, this sub-indicator seeks evidence that this requirement also explicitly considers acts of bribery or corruption involving public officials' relatives and associates, as well as the relatives and associates of business partners, whether directly or through business intermediaries. Although the company submitted feedback for this datapoint, however, the evidence provided does not address acts of corruption involving business partners' and public officials' relatives and associates,. [Supplier Code of Conduct, 2024: static.longi.com] • Not Met: Reports on any complaints on corruption and bribery: The Company's 2023 Sustainability Report states: 'cases of violations due to fraud and corruption were 0'. However, no details were found in relation to the amount of complaints in relation to this, even if the outcome was that there were no violations. [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com]
K.2.M	Payments to governments & contract transparency	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Publishing a tax CbCR in line with GRI 207-4, or • Not Met: Disclosure of terms, contracts, agreements for those payments • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI • Not Met: Expectation for project developers clients to disclose payments to governments at project level (including on land and natural resources)

L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.1.M	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190: Although the company submitted feedback for this datapoint, the evidence was not considered material, as it didn't refer to employees in all types of contracts, just human resources department and not clear the alignment with ILO 190. [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] • Not Met: Requires suppliers to provide training: Although the company submitted feedback for this datapoint, the evidence was not considered material. • Not Met: Provides materials and access to resources for trainings: Although the company submitted feedback for this datapoint, the evidence was not considered material. • Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it: Although the company submitted feedback for this datapoint, the evidence was not considered material. There is no mention to gender-based violence nor is provided to employees in all types of contracts & positions.

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.2.M	Gender balance and sensitivity	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Timebound action plan to integrate gender lens to all relevant documents: Although the company submitted feedback for this datapoint, the evidence was not considered material, as it didn't contain evidence related to the application of gender lens to the Company's human rights policies, due diligence and risk management. • Not Met: Demonstrates progress through annual reporting • Not Met: Women and non-binary people make up at least 40% of the Company's executives: No clear reference to the gender ratio. The 2023 Sustainability Report states that 25.21% of executive managers at LONGi are women. [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] • Not Met: Women and non-binary people make up at least 40% of the Company's board of directors: No clear reference to the gender ratio. The 2023 Sustainability Report states that the number of female directors on the Board is 2 (without indicating the total number of Board members). [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com]
L.3.M	Gender wage gap reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Has closed gender wage gap or timebound commitment: The Company's DEI policy states: 'As part of the United Nations Global Compact (UNGC) Accelerator program, LONGi commits to addressing gender balance and gender pay gaps through time-bound actions and disclosing DEI data and progress in our sustainability reports to promote transparency and ensure accountability in achieving our goals'. However, no actual details were found on the specific time-bound commitment to address pay gap. [Diversity, Equity, and Inclusion Policy, 2024: static.longi.com] • Not Met: Reports information at company level across multiple pay bands • Not Met: Expects business relationships to do the same

JT. Just transition

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.3.M	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.: The Company provides a link to an external initiative called EDF, Environmental Defence Fund, which is supported by LONGi. However, it appears to be an internship programme from a multistakeholder initiative rather than a Company public commitment to create access to green and decent jobs. • Not Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders. • Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups
JT.4.M	Fundamentals of retaining and re- and/or up-skilling workers for an inclusive and balanced workforce	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy. • Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition. • Not Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders. • Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups.
JT.6.M	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition. • Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition. • Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition. • Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection

3.a Response to risk of exposure to forced labour (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<ul style="list-style-type: none"> Area: Exposure to high risk of forced labour Story: According to recent data, approximately 35% of the world's polysilicon, and 32% of global metallurgical grade polysilicon, the material from which polysilicon is made, is produced in Xinjiang Uyghur Autonomous Region (XUAR). Investigations by UN bodies, academics and journalists have presented evidence on a number of human rights abuses including the use of forced labour in XUAR. In its July 2022 report to the UN General Assembly, the UN Special Rapporteur on Contemporary Forms of Slavery "regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in the Xinjiang Uyghur Autonomous Region of China" and finds that some instances of forced labour in the Region "may amount to enslavement as a crime against humanity". The Special Rapporteur states he "considers that indicators of forced labour pointing to the involuntary nature of work rendered by affected communities have been present in many cases" in the context of "State-mandated systems". Further analysis by independent UN experts concluded that the violations in the Region "may constitute international crimes, in particular crimes against humanity" and have urged China to address their "repeatedly raised concerns about widespread violations of the rights of Uyghurs and other Muslim minorities in the Xinjiang Uyghur Autonomous Region (XUAR) on the basis of religion or belief and under the pretext of national security and preventing extremism". [United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": documents-dds-ny.un.org] [United Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address grave human rights violations and the world must not turn a blind eye, say UN experts": ohchr.org] [International Service for Human Rights, "Repository of United Nations recommendations on human rights in China": ishr.ch] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global sola
M(0).1	Publication of independently verified full solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> Not Met: Public commitment to full solar supply chain transparency: In Its 2023 Sustainability Report, LONGi states that along with its partners, it is "committed to building a 'sunshine and transparent' supply chain". The Company also shares that it has "set up a digital traceability system that enables full chain traceability, from components to silicon mines, using a series of key production and sales information, such as module box numbers, module pallet numbers, cell batch numbers, monocrystalline identification, and silicon material order numbers." Its traceability system has passed audits by the U.S. Customs and Border Protection (CBP) and the Canada Border Services Agency (CBSA). While the company has shared that it has mechanisms to fully trace its raw materials these are not considered to meet the requirement of transparency under this indicator. The Company has not made a public commitment to publicly disclose the information of its supply chain mapping to the raw materials level. <p>The Company provided further comments to the BHRRC, however, key evidence was already in use. [Business and Human Rights Resource Centre, 05/08/2023, "LONGi response": media.business-humanrights.org] [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] & [Supply Chain Management System (website), N/A: longi.com]</p> <ul style="list-style-type: none"> Not Met: Publication of verified full solar supply chains: LONGi shares that in 2023, it had a total of 4,767 suppliers. 3,999 (83.89%) of which are bases in Mainland China; 21 (.44%) in Hongkong, Macau, and Taiwan Regions; and 747 (15.67%) overseas. The company also continues to disclose the various regions in China and overseas where its suppliers are located, such as Sichuan, Jiangsu, Vietnam, Singapore, etc. Xinjiang is not listed as one of the regions where any of its suppliers are based at the time this research was conducted. <p>In its response to the BHRRC in September 2023, the company states: "LONGi emphasizes that 'in the process of production activities or provision of services, we resolutely prohibit the employment of child labor and all forms of forced labor' and that 'We do not use or purchase any raw materials for products produced by forced labor, and are committed to ensuring that the products we provide are free of forced labor'."</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>While the Company provides a regional breakdown of its suppliers, it does not provide further granular details such as name, location, size, etc.</p> <p>The Company provided further comments to the BHRRC, however, key evidence was already in use. [2023 LONGi Sustainability Report, 18/04/2024: static.longi.com] & [Supply Chain Management System (website), N/A: longi.com]</p>
M(0).2	The company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Steps taken aligned with UNGPs: In its response to BHRRC in August 2023 LONGi states: "LONGi is committed to complying with applicable laws and business ethics in all jurisdictions in which we operate. In 2019, LONGi joined the United Nations Global Compact to support and promote the Compact's Ten Principles including labour and human rights." However, the information provided does not meet the criteria on explaining how steps taken align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships) at the time this research is conducted. <p>The Company provided further comments to the BHRRC, however, it was not material to the assessment of this indicator. [Business and Human Rights Resource Centre, 05/08/2023, "LONGi response": media.business-humanrights.org]</p> <ul style="list-style-type: none"> • Not Met: Information relevant to all destination markets

3.b Serious Allegations (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		No allegations meeting the REB severity thresholds under this heading were found

Disclaimer

This scorecard is based on assessments of publicly available documents on companies' websites by the EIRIS Foundation and BHRRC. Preliminary assessments were shared with companies for feedback. Feedback provided by companies has been analysed and incorporated when relevant to the indicator assessed. Information published or provided by companies after established and communicated cut-off dates* are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of April 2025.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

While the EIRIS Foundations and BHRRC have made reasonable endeavours to ensure that the methodology reflects best and emerging business and human rights practice in identifying, preventing, mitigating and remedying human rights harms as well as other responsible business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.

Scores for companies in the different project developer sub-categories (electric utilities, oil and gas, independent power producers) should not be compared to one another as these categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production for project developers and oil and gas companies, based on the World Benchmarking Alliance's Oil & Gas and Electric Utilities Benchmark, using ACT methodologies. **Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developer scores** as indicators have been tailored to reflect their position in renewable energy value chains.

Caution should be exercised in interpreting small differences in scores between companies within the same category and particularly small differences in the overall weighted scores because of the diversity of independent elements that are combined to produce the overall weighted scores. Scores should be understood in the context of the methods and weightings explained in the Methodology.

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* Cut-off dates: 31 January 2025 for companies that did not engage with the benchmark; the expiration of the feedback period (25 April 2025) for companies that engaged with the benchmark and provided additional documents published during that period.

contained therein or to correct any inaccuracies. That said, the assessment process has been conducted by BHRRC and its research partner the EIRIS Foundation in good faith and in the spirit of dialogue and cooperation.

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