

**Renewable Energy & Human Rights Benchmark 2023
Company Profile**

Company name Trina Solar
Sub-sector Solar Panel Manufacturer
Overall score 8.1% weighted average

Section score	Weighting	For section
23.5%	20%	1. UNGP core indicators
4.5%	40%	2. Salient human rights risks
0.0%	20%	3. Serious allegations
N/A	20%	4. ACT assessment as conducted by the World Benchmarking Alliance*

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: business-humanrights.org

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 2023 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 2022 CHRB methodology (20% of total)

A. Policy commitments and governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The document "2022 Trina Solar Global Human Rights Principles" outlines Trina Solar's human rights policy. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] Met: Universal Declaration of Human rights (UDHR): The 2022 Trina Solar Global Human Rights Principles document states that "Trina Solar is committed to respecting internationally recognized human rights principles in our operations and throughout our value chain, including Universal Declaration of Human Rights, United Nations Global Compact (UNGC), ILO Declaration on Fundamental Principles and Rights at Work, Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the laws of the countries in which we operate." [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Commitment to UNGPs: The 2022 Trina Solar Global Human Rights Principles document states that "Trina Solar is committed to respecting global fundamental human rights in line with United Nations (UN) Guiding Principles on Business and Human Rights as well as the labor rights in terms of safety in the workplace, the right to fair pay, the workers' physical and mental integrity etc." [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] Met: Commitment to OECD MNE Guidelines: See above.

* For information on the ACT methodology and scoring criteria please refer to the [World Benchmarking Alliance](https://worldbenchmarkingalliance.org).

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A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to ILO core principles: See above. • Met: Explicitly lists all four ILO core principles: The 2022 Trina Solar Global Human Rights Principles document includes sections on the freedom of association, collective bargaining, forced labour, child labour and discrimination. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects suppliers to commit to ILO core principles: See above. However, no evidence found that it expects suppliers to comply with these policies. No clear reference to ILO and supplier expectations in publicly available documents. In Trina Solar's response to BHRRC Just Transition, it states that 'Trina Solar communicates the importance of fair treatment of labourers and transparent investigation into the origin of materials and working conditions to its suppliers. The company uses various methods, such as contract terms, letters of commitment, shared tracing information, and supplier audits to ensure its suppliers comply with their social responsibility obligations'. It has also provided an additional document, Supplier EHS & CSR Management Procedure, which could not be found publicly published. Moreover, only policy commitments are considered a suitable source for this indicator. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Explicitly lists all four ILO core principles for suppliers: No evidence found that the Company expects suppliers to commit to each of the four ILO core principles. It has also provided an additional document, Supplier EHS & CSR Management Procedure, which could not be found publicly published. Moreover, only policy commitments are considered a suitable source for this indicator. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com]
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts: Trina Solar's 2022 Sustainability Report indicates that '[t]here was no such occurrence' when it comes to '[o]perations with significant actual and potential negative impacts on local communities'. The Human Rights Principles states: 'Trina Solar regularly assesses human rights related risks and potential impacts. We conduct periodically review on the global human rights principles, and update our policies, regulations, and procedures accordingly, so as to drive for continuous improvement for human rights performance'. However, no publicly available statement found of a commitment to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. No further evidence found in its Compliance Information Reporting Platform. Moreover, only policy commitments are considered a suitable source for this indicator. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Expects suppliers to make this commitment: The Human Rights Principles states: 'Trina Solar is committed to providing a decent workplace for employees, suppliers, and other stakeholders'. The EHS and Energy Management Policy notes it pledges: 'Pledge our support and commitment to help our suppliers improve their EHS & energy management performance and take social responsibility'. However, no evidence found that it expects its suppliers to commit it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. It has also provided an additional document, Supplier EHS & CSR Management Procedure, which could not be found publicly published. Moreover, only policy commitments are considered a suitable source for this indicator. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] & [EHS and Energy Management Policy, 09/2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Company has provided a document regarding this indicator, the Employee Handbook & Code of Conduct, which could not be publicly found. • Not Met: Commitment to work with suppliers on remedy: The Company has provided a document regarding this indicator, the EHS & CSR Management Procedure, which could not be publicly found.
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Product Stewardship Policy notes: 'Trina Solar continuously keeps vigilant in its commitment to safeguard workers' rights in global supply chains. We commit to no use of child labor and forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor'. The 2022 Sustainability Report adds: 'In 2009, the Company

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			<p>established the EHS Committee and promulgated and implemented the EHS Committee Management System. We regularly update the organizational structure and the management system of the EHS Committee to meet or go beyond international and domestic regulatory requirements, proactively undertake environmental responsibilities, and lead the green development of the industry. [...] We also further detailed the organizational structure of the EHS Committee and established a management and organizational system in which our EHS Department assisted manufacturing workshops, facilities, warehouses, Administrative Department, Human Resources Department, Trade Union, and other departments'. However, it is not this Committee tasked with specific governance oversight of respect for human rights and that it is a Board Committee. The Company has provided further comments regarding this indicator which could not be publicly found. [Product Stewardship Policy, 20/01/23: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com]</p> <ul style="list-style-type: none"> • Not Met: Describes HRs expertise of Board member: No description of the human rights expertise of the Board member or Board committee tasked with that governance oversight found in the following documents: Product Stewardship Policy, Human Rights Principles, 2022 Sustainability Report. [Product Stewardship Policy, 20/01/23: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications: The Product Stewardship Policy is signed by the Chairman & CEO of Trina Solar. The Company also has a document on Human Rights Principles. However, no communication found where Board members or the CEO clearly signal the Company's commitment to human rights, discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business. [Product Stewardship Policy, 20/01/23: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com]

B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HRs implementation and decision making: The Company has provided a document regarding this indicator which could not be publicly found. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes day-to-day responsibility for implementing HRs commitments: The Company has provided sources regarding this indicator, Trina Solar Employee Manual and Trina Solar Business Ethics and Code of Conduct for Employees, which could not be publicly found. No further evidence found in the 2022 Sustainability Report. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Day-to-day resources and expertise allocation in own operations: See above. The Company has provided sources regarding this indicator, Trina Solar Employee Manual and Trina Solar Business Ethics and Code of Conduct for Employees, which could not be publicly found. It has provided further comments which could not be publicly found. • Not Met: Resources and expertise allocation in supply chain: The Company has provided a document regarding this indicator, the EHS & CSR Management Procedure, which could not be publicly found.
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations: According to the 2021 Environmental, Social and Governance (ESG) Report, "Conflict minerals" refers to the mineral precursors of the metals tin, tantalum, tungsten, gold and cobalt mined in the Democratic Republic of Congo and its neighboring countries, of which the mining and sale may link to serious human rights and environmental problems. Tin-plated copper tape is used in producing PV modules. When we use materials involving tin-coated tape, junction boxes and terminals, or lead-free tin wire, we need suppliers to trace the origin of the minerals. Trina Solar has taken active actions since we realized that conflict minerals may enter our supply chain. Trina Solar attaches great importance to the issue of conflict minerals. We actively formulate the Management Plan for Conflict Minerals of Trina Solar, which states that Trina Solar neither purchases nor supports the use of conflict minerals, establish the management system, carry out supply chain conflict mineral

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			<p>investigation and identify mineral sources, and conduct conflict minerals training for key cooperative suppliers'. However, criterion is not met due to the lack of a general description as to how the Company identifies human rights risks in its operations and beyond conflict minerals. The 2022 Sustainability Report discloses its 2022 materiality matrix, which includes: social issues; labour rights; and diversity, equity and including. It contains further explanation on the matrix. The Report also indicates engages with employees through Employee Satisfaction Surveys. However, no evidence found of the process it has in place to identify its human rights risks and impacts covering its own operations. Current evidence refers to a materiality analysis which does not necessarily entail a human rights due diligence identification process. The Company has provided a document regarding this indicator, the Trina Solar Employees Manual, which could not be publicly found. [2021 ESG Report, 2022: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com]</p> <ul style="list-style-type: none"> • Not Met: Describes process for identifying risks in business relationships: See above. However, no evidence found of the process it has in place to identify its human rights risks and impacts in specific locations or activities, covering its suppliers. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management procedure, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation: The 2022 Sustainability Report notes: 'Through various communication channels, we regularly collect the views and suggestions of internal stakeholders such as employees and Management, as well as the expectations and responses of external stakeholders such as government and regulatory bodies, shareholders and investors, customers, suppliers and partners, media, community, and NGOs. The collected data is regularly summarize and feedback is provided to the Company's management'. It discloses information on different cross-industry initiatives it is a member of. However, the subindicator looks for a description of the global systems it has in place to identify its human rights risks and impacts on a regular basis across its activities involving consultation with affected stakeholders and internal or independent external human rights experts. It is not clear whether and how the Company collects all information described and articulates within a due diligence process. No further evidence found. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Describes how risk identification system is triggered by new circumstances: The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. • Not Met: Describes risks identified in relation to new circumstances: According to the 2021 Environmental, Social and Governance (ESG) Report, "Conflict minerals" refers to the mineral precursors of the metals tin, tantalum, tungsten, gold and cobalt mined in the Democratic Republic of Congo and its neighboring countries, of which the mining and sale may link to serious human rights and environmental problems. Tin-plated copper tape is used in producing PV modules. When we use materials involving tin-coated tape, junction boxes and terminals, or lead-free tin wire, we need suppliers to trace the origin of the minerals. Trina Solar has taken active actions since we realized that conflict minerals may enter our supply chain. Trina Solar attaches great importance to the issue of conflict minerals. We actively formulate the Management Plan for Conflict Minerals of Trina Solar, which states that Trina Solar neither purchases nor supports the use of conflict minerals, establish the management system, carry out supply chain conflict mineral investigation and identify mineral sources, and conduct conflict minerals training for key cooperative suppliers'. However, criterion is not met because it is unclear whether the issue of conflict minerals was identified in the context of new circumstances as per indicator above. The 2022 Sustainability Report describes the Company's process of identifying 'Conflict Minerals': 'Determine the scope of products and suppliers - Review bill of materials for products to identify 3TG and corresponding suppliers; Perform a reasonable level of mineral origin investigation - Use supplier CMRT questionnaires to obtain the necessary information from suppliers to assess the source and sourcing of 3TG to meet conflict minerals reporting requirements; Conduct due diligence Conduct supplier control matrix risk assessment based on feedback from suppliers on country of origin surveys for reasonable levels of minerals - Each subsidiary submits its findings to the head office; Report the conflict mineral status of each subsidiary's product components as required by the template issued by the head office - Sort out the process Sort out and ensure compliance with existing operational processes'. However, this indicator looks for a description of the risks

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			identified when its global system to identify human rights risks is triggered by new country operations, new business relationships, new human rights challenges or conflict affecting particular locations. [2021 ESG Report, 2022: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com]
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The 2022 Sustainability Report notes: contains information on its Labor Guidelines and it publishes its Materiality Sustainability Matrix. However, it is not clear the process it has in place to assess its human rights risks. This description should include how relevant factors are taken into account, such as geographical, economic, social and other factors. Current evidence includes a materiality analysis which does not necessarily entail a human rights due diligence assessment process. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Describes how process applies to supply chain: The 2022 Sustainability Report discloses information on its Requirements for Labor Human Rights and Occupational Health and Safety for Trina Solar Suppliers. However, this subindicator looks for a process it has in place to assess its human rights risks at its supply chain. This description should include how relevant factors are taken into account, such as geographical, economic, social and other factors. No further evidence found. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Public disclosure of results of HRs risk assessment: The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. No evidence found of the results of its human rights assessments. [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders: The 2022 Sustainability Report discloses information on its stakeholder communication. However, this subindicator looks for a description of how it involves affected stakeholders in the assessment processes of due diligence. No further evidence found. [2022 Sustainability Report, 2023: static.trinasolar.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Company has provided a document regarding this indicator, the EHS Management System & CSR Internal Audit Management Procedure, which could not be publicly found. It has provided further comments, however, its content has not been found in publicly available sources. • Not Met: Describes how global system applies to supply chain: The Company has provided a document regarding this indicator, the EHS Management System & CSR Internal Audit Management Procedure, which could not be publicly found. • Met: Example of actions decided on at least 1 salient HRs issue: For example, in terms of conflict minerals in DRC, the 2021 Environmental, Social and Governance (ESG) Report states that "'Conflict minerals" refers to the mineral precursors of the metals tin, tantalum, tungsten, gold and cobalt mined in the Democratic Republic of Congo and its neighboring countries, of which the mining and sale may link to serious human rights and environmental problems. Tin-plated copper tape is used in producing PV modules. When we use materials involving tin-coated tape, junction boxes and terminals, or lead-free tin wire, we need suppliers to trace the origin of the minerals. Trina Solar has taken active actions since we realized that conflict minerals may enter our supply chain. Trina Solar attaches great importance to the issue of conflict minerals. We actively formulate the Management Plan for Conflict Minerals of Trina Solar, which states that Trina Solar neither purchases nor supports the use of conflict minerals, establish the management system, carry out supply chain conflict mineral investigation and identify mineral sources, and conduct conflict minerals training for key cooperative suppliers." [2021 ESG Report, 2022: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken: The 2022 Sustainability Report discloses information on its stakeholder communication. However, this subindicator looks for a specific description of how it involves affected stakeholders in decisions about the actions to take in response to its salient human rights issues. No further evidence found. [2022 Sustainability Report, 2023: static.trinasolar.com]

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B.2.4	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> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions: The Company has provided a document regarding this indicator, the EHS Management System & CSR Internal Audit Management Procedure, which could not be publicly found. It has provided further comments, however, its content has not been found in publicly available sources. • Not Met: Example of lessons learned from evaluation effectiveness of actions: The 2022 Sustainability Report discloses information on its Employee Communication Meetings: 'On Jan 19, 2022, Trina Solar held its 2022 employee meeting. The core management of the Company answered questions from employees covering corporate operations, R&D layout, career planning and other dimensions; Every spring, Trina Solar organizes outdoor development and group building activities to promote mutual communication among employees and enhance teamwork ability; Trina Solar HR and labor unions regularly organize communication meetings for front-line managers and team leaders to listen to the voices of employees and promote the company's management ability and service awareness'. However, the subindicator looks for an example of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of its due diligence process. [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions: The 2022 Sustainability Report discloses information on its stakeholder communication. However, it is not clear how it involves affected stakeholders in evaluation of whether the actions taken [in the context of a due diligence process, to address Human Rights risks and impacts] have been effective. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [2022 Sustainability Report, 2023: static.trinasolar.com]
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: The 2022 Sustainability Report discloses information on its Employee Communication Meetings: 'On Jan 19, 2022, Trina Solar held its 2022 employee meeting. The core management of the Company answered questions from employees covering corporate operations, R&D layout, career planning and other dimensions; Every spring, Trina Solar organizes outdoor development and group building activities to promote mutual communication among employees and enhance teamwork ability; Trina Solar HR and labor unions regularly organize communication meetings for front-line managers and team leaders to listen to the voices of employees and promote the company's management ability and service awareness'. However, no examples found demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. The Company is expected to provide two examples. [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them: The Chairman's Message for the 2022 Sustainability Report states: 'Together, we have experienced an unforgettable 2022, characterized by greater challenges in addressing climate change and advancing the UN 2030 Agenda for Sustainable Development due to geopolitical instability and the energy security crisis'. However, this subindicator looks for description of any challenge to effective communication it has identified and how it is working to address them. [2022 Sustainability Report, 2023: static.trinasolar.com]

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> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: Trina Solar's 2022 Sustainability Report indicates that "Trina Solar values the voices of employees and encourages them to solve problems and disputes through internal communication and grievance mechanisms in order to create and maintain a good working atmosphere." Trina Solar Global Human Rights Principles states that "Trina Solar encourages employees to provide suggestions or opinions to help the company improve its management efficiency. Trina Solar setups grievance mechanism by providing various channels, including email, hotline, suggestion boxes, online platforms etc., to enable employees, suppliers and other external stakeholders to report any concerns in the workplace." The Company provided feedback regarding this indicator, however, key evidence was already in use. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The 2022 Sustainability Report discloses information on Employee Communication Channels and well as on news employee training. The Compliance Information Reporting Platform is available in two languages. However, no evidence found of how it ensures the mechanism is available in all appropriate languages and how workers are made aware of it. The Company has provided further sources regarding this indicator, the EHS & CSR Management Procedure and the Anti-fraud Reporting channel, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Compliance Information Reporting Platform_web, N/A: wb.trinasolar.com:8090] • Not Met: Describes how workers in supply chain access grievance mechanism: The 2022 Sustainability Report has information on employee communication. The Compliance Information Reporting Platform is available online. The Company has provided comments regarding this indicator, however, its content, on contracts with suppliers, has not been found in publicly available sources. It is not clear if suppliers' employees have access to file complaints in relation to suppliers' behaviour as it indicates it 'encourages' suppliers to do it. It could be either by using the Company's own mechanism or the Company expects its suppliers to establish a mechanism for their workers to raise such complaints or concerns. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Expects suppliers to convey expectation to their suppliers: The Human Rights Principles states: 'Trina Solar is committed to respecting internationally recognized human rights principles in our operations and throughout our value chain, including Universal Declaration of Human Rights, United Nations Global Compact (UNGC), ILO Declaration on Fundamental Principles and Rights at Work, Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the laws of the countries in which we operate'. However, it is not clear the Company expects extractive business partners to convey expectations [to have a channel from which workers can access to raise Complaints or concerns about human rights issues at the Company's business partners] on access to grievance mechanism(s) to their business partners. [Global Human Rights Principles, 30/09/2022: static.trinasolar.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> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The Global Human Rights Principles states that 'Trina Solar encourages employees to provide suggestions or opinions to help the company improve its management efficiency. Trina Solar setups grievance mechanism by providing various channels, including email, hotline, suggestion boxes, online platforms etc., to enable employees, suppliers and other external stakeholders to report any concerns in the workplace'. The 2022 Sustainability Report notes: 'In order to protect the legitimate interests of the Company, support and protect the reporting behaviour of whistle-blowers and ensure that violations are independently, objectively, and impartially investigated and dealt with, an open, transparent, and unobstructed reporting and investigation procedure, a management communication mechanism and a reward and punishment mechanism have been established in the Company Reporting Rewards Management Measures to encourage employees, customers, suppliers and other stakeholders to report possible misconduct of which they are aware'. It discloses information on the different channels. The Compliance Information Reporting

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			<p>Platform is available online. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com] Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Compliance Information Reporting Platform is available in in both Chinese and English. The Company's Sustainability Reports are available online and contain information on the grievance mechanisms. However, this subindicator focuses on the description of how the Company actively ensures that all affected external stakeholders at its own operations are aware of these grievance mechanisms. Moreover, it is not clear it is available in local languages. The Company has made reference to the Business Ethics and Code of Conduct for Employees, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Compliance Information Reporting Platform_web, N/A: wb.trinasolar.com:8090] • Not Met: Describes how external individuals/communities access grievance mechanism: See above. However, it is not clear that external individuals and communities have access to it, in order to raise complaints or concerns about human rights issues at the Company's suppliers. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Compliance Information Reporting Platform_web, N/A: wb.trinasolar.com:8090] • Not Met: Expects supplier to convey expectation to their suppliers: The Human Rights Principles states: 'Trina Solar is committed to respecting internationally recognized human rights principles in our operations and throughout our value chain, including Universal Declaration of Human Rights, United Nations Global Compact (UNGC), ILO Declaration on Fundamental Principles and Rights at Work, Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the laws of the countries in which we operate'. The Compliance Information Reporting Platform is available online. The Company has provided comments contracts with suppliers, however, its content has not been found in publicly available sources. It is not clear the Company expects suppliers to convey expectations [to have a channel from which external individuals and communities can access to raise complaints or concerns about human rights issues at the Company's suppliers] on access to grievance mechanism(s) to their suppliers. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] & [Compliance Information Reporting Platform_web, N/A: wb.trinasolar.com:8090]
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts: The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources and they were in Chinese. Only documents in English are accepted according to the research methodology. • Not Met: Describes how remedy would be provided if no adverse impact identified: The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources and they were in Chinese. Only documents in English are accepted according to the research methodology. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts: The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources and they were in Chinese. Only documents in English are accepted according to the research methodology. • Not Met: Describes approach to monitoring/implementing agreed remedy: The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. • Not Met: Describes approach to learning from incidents if no adverse impacts identified: The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources and they were in Chinese. Only documents in English are accepted according to the research methodology.

CSI. Responsible lobbying and political engagement fundamentals

Indicator Code	Indicator name	Score (out of 2)	Explanation
CSI.18	Responsible lobbying and political engagement fundamentals	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: No evidence found that the Company has a publicly available policy statement(s) (or policy(ies)) setting out its lobbying and political engagement approach in the webpage section EU Transparency Register. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [Transparency Register_web, N/A: ec.europa.eu] • Not Met: Publicly available policy statement that specifies the Company does not make political contributions: The Company makes reference to the webpage section EU Transparency Register. However, no evidence found that the Company has a publicly available policy statement specifying that it does not make political contributions. [Transparency Register_web, N/A: ec.europa.eu] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Disclosure of expenditures on lobbying activities • Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)

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> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Expectation of project developer clients to have a public commitment to respect indigenous rights: The Human Rights Principles states: 'Trina Solar has established an integrated management system to manage human rights issues across our businesses. We are committed to maintaining and improving the management system to avoid any potential risks of human rights violations. We apply the following policies, regulations, and procedures to comply with the global human rights principles and to prevent any potential infringements of human rights resulting from our activities, products, or any activities in our supply chain'. It then discloses a list of policies. However, it is not clear it expects business partners (project developer clients) in its value chain to have a public commitment to respect indigenous peoples' rights in line with international law and standards (in contractual agreements, supplier code of conduct or other relevant practices). [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Expectation for suppliers in contracts or supplier codes of conduct to have public commitment to respect indigenous rights: No evidence found, in its Global Human Rights Principles, that it expects business partners (upstream mineral suppliers) in its value chain to have a public commitment to respect indigenous peoples' rights in line with international law and standards (in contractual agreements, supplier code of conduct or other relevant practices). The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to only work with business partners that respect FPIC (in line with ILO No.169): Trina Solar's website indicates 'Notify communities at the earliest stage in development possibly about proposed new utility-scale solar projects in their area' is listed as a consideration when engaging with communities in local utility solar deployment projects. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. The Company has provided comments regarding supplier contracts, however, its content has not been found in publicly available sources. No evidence found that the Company is committed to only working with business partners in its value chain that respect free prior and informed consent (FPIC) in line with ILO Convention 169. [Blog Post on Engaging local communities, 27/04/23: trinasolar.com]
D.2.M	Engagement with all affected communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how local communities identified and engaged in the last two years: For manufacturers, this criteria is looking for a process to engage with communities on potential impacts related to the operational phase of the project the manufacturer is involved in (ie: impacts of the construction,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>operation/maintenance on communities for example). The 2022 Sustainability Report indicates 'Through various communication channels, we regularly collect the views and suggestions of internal stakeholders such as employees and Management, as well as the expectations and responses of external stakeholders such as government and regulatory bodies, shareholders and investors, customers, suppliers and partners, media, community, and NGOs. The collected data is regularly summarize and feedback is provided to the Company's management. Targeted communications are also conducted'. It discloses its different stakeholder groups as well as focus areas and mode engagement for each of these groups. It also reports on its materiality matrix. However, no description found on the process by which it has identified affected stakeholders (read local communities and indigenous groups) with whom to engage, and engaged with them in the last two years. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [2022 Sustainability Report, 2023: static.trinasolar.com]</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of engagement with communities: The 2022 Sustainability Report discloses information on 'Improving Labor Protection in Supply Chain: 'We require our suppliers to comply with international labor standards and the requirements of Trina Solar's Code of Business Conduct, respect the basic human rights of their full- and part-time employees, and fulfil the responsibilities to protect the health and safety of their employees. We explicitly list the key audit requirements for labor human rights protection and occupational health and safety in the Supplier EHS Management Procedures to ensure unbiased supplier labor rights with clear audit and evaluation management procedures'. It also explains its Supply Chain Injury Prevention Capacity Building Project. However, no examples of its engagement with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multistakeholder initiatives) in the last two years found. Engagement in this context is understood as ongoing process of interaction and dialogue between the Company and its affected stakeholders that enables it to hear, understand and respond to their interests and concerns, including through collaborative approaches. The Company is expected to provide two of such examples. The Company has also provided comments regarding this indicator, however, its content has not been found in publicly available sources. It has also made reference to the 2021 ESG Report, but no further evidence found in the document. [2022 Sustainability Report, 2023: static.trinasolar.com] & [2021 ESG Report, 2022: static.trinasolar.com] • Not Met: Examples of engagement refer to marginalised groups and provide additional detail: The 2022 Sustainability Report explains the 'Lighting up the "Photovoltaic Campus' project. 'For many years, Muer Primary School in Xichang City, [...] has been faced with a shortage of electricity supply and frequent power outages due to its geographical environment. In 2022, Trina Solar assisted Muer Primary School in building a 13.5 kilowatt photovoltaic power plant with an average annual power generation capacity of 17,900 KWh. The project adopts a "self-generation, surplus power online" model, which brightens up the campus and ensures stable electricity consumption for teaching, while bringing sustainable income to the school and helping the national "carbon peak and carbon neutral" goal and green development of the countryside'. However, this subindicator looks for a description of how affected communities by the Company's operations were identified [in the context of the examples provided above], how consultations took place, if and how traditionally marginalised groups were included (for example, women, indigenous peoples, afro-descendants, religious minorities, people with disabilities, LGBTQA+, children), evidence of if, how, and when free, prior and informed consent for projects was achieved, and what happened when it was not. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. For manufacturers, this criteria is looking for an expectation that project developers have these elements in place in the consultations they undertake. [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues: The 2022 Sustainability Report notes: 'Trina Solar effectively identifies sustainable issues in the context of the Company's own business characteristics and external environmental policy changes, and organically integrates the demands and expectations of stakeholders into its strategic planning and business layout'. It then discloses its materiality matrix. However, no summary analysis of the input/views given by stakeholders on human rights issues found. The Company has provided

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>comments regarding this indicator, however, its content has not been found in publicly available sources. [2022 Sustainability Report, 2023: static.trinasolar.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how stakeholders views influenced company's HRs approach: The 2022 Sustainability Report notes: 'Through various communication channels, we regularly collect the views and suggestions of internal stakeholders such as employees and Management, as well as the expectations and responses of external stakeholders such as government and regulatory bodies, shareholders and investors, customers, suppliers and partners, media, community, and NGOs. The collected data is regularly summarize and feedback is provided to the Company's management. Targeted communications are also conducted'. It discloses a list of stakeholder groups as well as respective focus areas for each of them. However, it is not clear how stakeholders views on human rights issues [from stakeholder engagement] have influenced the development or monitoring of its human rights approach. No further evidence found. [2022 Sustainability Report, 2023: static.trinasolar.com]
D.3.M	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Rewards for clients that have a commitment to identify potential benefit and ownership sharing: The 2022 Sustainability Report notes: 'We evaluate suppliers in various aspects such as technology, quality, delivery, service, cost, innovation, social responsibility, safety, and environment according to their categories and with different weights. Furthermore, we complete an assessment and recognition of suppliers based on the evaluation results, while carrying out targeted communication and counselling, and gradually restricting procurement, freezing and eliminating suppliers that fail to improve in the long run'. However, no evidence found that the Company rewards relevant businesses (project developer clients) in its value chain for having a commitment to identify potential benefit and ownership sharing options that serve affected communities including a commitment to explore co-ownership models. [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Rewards for clients for disclosing statistics for each project (demographics of ownership sharing): The 2022 Sustainability Report notes: 'Trina Solar actively builds a new supply ecosystem focusing on the customers. In January 2022, the Trina Solar Global Supplier Conference was held in Changzhou with the theme of "Building a New Eco-system for the PV Industry with Openness and Innovation". The conference set up four awards: Joint Innovation Award, Best Collaboration Award, Quality Excellence Award, and Excellent Supplier Award to thank our supplier partners for their sincere cooperation as always'. However, no evidence found that it rewards relevant businesses in its value chain (for example project developer clients) for disclosing statistics for each of its projects and/or operations describing the demographics of its benefits and ownership sharing processes, including any final agreements, percentage of revenue of projects and/or equity shares paid to local communities, and how members of affected communities participated in the decision-making. [2022 Sustainability Report, 2023: static.trinasolar.com]
D.4.M	Local wind & solar energy access, affordability	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Actions taken to support access and affordability of renewable energy in the value chain: The 2021 Environmental, Social and Governance (ESG) Report states that '[a]s a social responsibility corporate, Trina Solar never forgot to provide various benefits to the people and to the society during its operation and developing. Trina Solar donated 5 mil. RMB to Henan Province for their disaster relief and reconstruction afterwards; constructed the "Green benefits – Mekong-Lancang Cooperation (MLC) PV Off-grid Power Generation Project" in Cambodia for providing clean power to local schools. We also donated a total of 350 sets home appliances (1,050 pieces), with value of nearly 1.8 million RMB, to 350 villagers who chose to buy houses for the "Western Wuzhen" project, etc'. The 2022 Sustainability Report explains the project Lighting up the "Photovoltaic Campus" - a Vivid Sample of Trina Solar's Contribution to New Energy Science Education: 'For many years, Muer Primary School in Xichang City, [...] has been faced with a shortage of electricity supply and frequent power outages due to its geographical environment. In 2022, Trina Solar assisted Muer Primary School in building a 13.5 kilowatt photovoltaic power plant with an average annual power generation capacity of 17,900 KWh. The project adopts a "self-generation, surplus power online" model, which brightens up the campus and ensures stable electricity consumption for teaching, while bringing sustainable income to the school and helping the national "carbon peak and carbon neutral" goal and green

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>development of the countryside'. It also discloses information on its Solar's Vertex Modules in the Sunshine Bank: 'In 2022, the residents of Yaoma Village and Zhujia North Village in Zibo, Shandong Province, have installed and used Trina Vertex modules in every household, which have become a "sunshine bank" for local villagers while continuously producing clean energy. Among them, the total annual power generation capacity of the Yaoma Village household project can reach about 2.8 million KWh, generating an income of about 1.1 million RMB for the villagers; the 1 MW village-level PV power generation project in Zhujia North Village is expected to generate a total of 1.5 million degrees per year, and the power generated will be centralized and synced to the national grid. This initiative can make full use of the roofs of rural houses, bring villagers income from housing rental fees and develop the local low-carbon economy'. However, evidence does not seem to cover the Company's value chain. [2021 ESG Report, 2022: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com]</p> <p>• Not Met: Including a timebound action plan and reporting targets on supporting energy access and affordability in consultation with communities: The 2022 Sustainability Report notes: 'Trina Solar actively fulfils its corporate social responsibility, reaches out to the disadvantaged and poor groups through public welfare activities, carries out precise support work from multiple angles and directions, actively guides students in less developed regions to learn new energy industry application knowledge and technology, helps local entrepreneurship and employment, and contributes to the economic development of less developed regions'. It adds: 'Since its establishment, Trina Solar has actively undertaken social responsibility, practiced its initial intention and mission, and promoted the global energy transition. We continue to promote the construction of renewable energy, ensure the global supply of products, and provide renewable energy products and technology training to developing countries, contributing to the empowerment of the global energy transition. We deeply care about the uneven development of regions at home and abroad, and provide as much help and support as we can to give back to local communities while progressing alongside society. During the Reporting Period, our total community contribution and philanthropic investment funds amounted for 4.795 million RMB'. However, it is supposed to include a timebound actions plan and reporting on targets developed in consultation with communities including marginalised groups at heightened risk of energy poverty. No further evidence found.</p> <p>[2022 Sustainability Report, 2023: static.trinasolar.com]</p> <p>Score 2</p> <p>• Not Met: Public support for government policies addressing energy access: The 2021 Environmental, Social and Governance (ESG) Report states that Trina Solar supported the official Mekong-Lancang Cooperation and 'constructed the "Green benefits – Mekong-Lancang Cooperation (MLC) PV Off-grid Power Generation Project" in Cambodia for providing clean power to local schools'. The EHS and Energy Management Policy notes: 'We promise to use energy and natural resources responsibly and efficiently, and participate in global carbon reduction initiatives'. The 2022 Sustainability Report adds: 'Our mission is "Solar Energy for All", and the Company's long-term layout and action plans for sustainable development are moving forward. [...] Trina Solar has adhered to the mission of "Solar Energy for All", and has always been committed to leading the way in smart solar energy solutions for a net-zero future'. The Company indicates it is a supporter of the Global Renewable Alliance. The Company has provided an additional source, however, it could not be accessed. However, no evidence found that it publicly supports government policies and actions to address energy access challenges (including but not limited to affordability of electricity, grid electrification, mini grids, etc). [2021 ESG Report, 2022: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com]</p>

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Expectation for clients to have commitment to respect land ownership/natural resources as in VGGT: The EHS and Energy Management Policy notes 'We pay attention to employees' health & safety and sustainable development. We are dedicated to creating a safe, healthy and environmentally-friendly workplace for employees and a harmonious green planet for mankind. We promise to use energy and natural resources responsibly and efficiently, and participate in global carbon reduction initiatives'. However, no evidence found that it expects business partners (project developer clients) in its value chain to have a public commitment to respecting land rights of legitimate tenure rights holders as set out in the UN VGGT, including where land and ownership rights are customary and/or not formally recorded (including via contractual agreements with suppliers, supplier code of conduct or other relevant practices). The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [EHS and Energy Management Policy, 09/2023: static.trinasolar.com] • Not Met: Expectation for suppliers to have commitment to respect land ownership/natural resources as in VGGT: The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose: The 2021 ESG Report discloses information on the actions the Company takes in support of the different SDGs. It also indicates: 'When planning new projects or power plants we carry out environmental impact assessments in line with local environmental protection regulations. We assess the positive and negative impacts of the proposed project on the environment of the community and take effective measures to protect the natural environment and biodiversity of the community where the proposed project is located. Trina Solar has constructed a number of complementary solar power projects on fishing farm and agricultural facilities without changing the original use of the land, which is not only benefit to the protection of the ecological environment and alleviating land-use conflicts, but also renewable energy supply, and create dual value'. However, no description found of the steps it has taken to use its leverage to work towards a resolution in line with international standards [when land rights are contested in a project or business relationship the Company is involved in]. If it has not been involved in such a project, it is expected to disclose that. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [2021 ESG Report, 2022: static.trinasolar.com]
E.2.M	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Expectations for clients to commit to IFC PS 5 for physical and economic displacements: The 2022 Sustainability Report explains: 'Trina Solar upholds the business ethics of honesty, compliance, and fair competition, and is committed to establishing a professional and industry-leading business ethics compliance system, building a sustainable ethical business culture of integrity, and ensuring the highest ethical standards in our interactions with all stakeholders'. The 2022 Sustainability Report explains different focus areas and how it engagement with its suppliers and partners, among other stakeholders, as well as its anti-corruption approach. However, no evidence found that it expects relevant business partners (project developer clients) in its value chain to commit to follow IFC Performance Standard 5 when physical and economic displacement for a project is determined to be necessary. [2022 Sustainability Report, 2023: static.trinasolar.com]

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Expectations for suppliers to commit to IFC PS 5 for physical and economic displacements: The Human Rights Principles states: 'We are committed to incorporating these universal human rights principles into our strategies, policies and procedures, and establishing a culture of integrity, so as to set up a stage for our long-term success. [...] We apply the following policies, regulations, and procedures to comply with the global human rights principles and to prevent any potential infringements of human rights resulting from our activities, products, or any activities in our supply chain'. It then lists different policies, regulations, and procedures. The 2022 Sustainability Report explains its anti-corruption approach and its whistle-blowing systems. However, no evidence found that it expects relevant business partners (upstream mineral suppliers) in its value chain to commit to follow IFC Performance Standard 5 when physical and economic displacement for a project is determined to be necessary. The Company has provided additional documents regarding this indicator, the Supplier EHS & CSR Management Procedure and the Trina Solar Supplier Social Responsibility Agreement, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Expectation for suppliers to have a commitment not to relocate without FPIC and to providing compensation: The Product Stewardship Policy indicates: 'Trina Solar conducts business in a manner that ensures compliance with all applicable regulatory requirements and industry standards. We are committed to integrating environmental, health, safety, and social responsibilities into all stages of our product life cycle'. The EHS and Energy Management Policy adds: 'We are dedicated to creating a safe, healthy and environmentally-friendly workplace for employees and a harmonious green planet for mankind. We promise to use energy and natural resources responsibly and efficiently, and participate in global carbon reduction initiative'. However, no evidence was found that it expects relevant business partners in its value chain (at minimum project developer clients and upstream mineral suppliers) to commit to not relocate or displace affected communities without obtaining free, prior, and informed consent (FPIC) and to providing just and fair compensation, as agreed during the FPIC and resettlement process with relevant stakeholders. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [Product Stewardship Policy, 20/01/23: static.trinasolar.com] & [EHS and Energy Management Policy, 09/2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expectation for clients to disclose statistics on relocations (current and planned projects) • Not Met: Expectation for suppliers to publish statistics on relocations (current and planned projects): No evidence found, in the EHS and Energy Management Policy, that it also expects upstream suppliers to publish statistics regarding the number of people relocated by current and planned projects it is involved in. [EHS and Energy Management Policy, 09/2023: static.trinasolar.com] • Not Met: Expectation for clients to disclose reviews of living conditions of relocated communities: No evidence found, in the EHS and Energy Management Policy, that the Company expects project developer clients to publish regular (at least annually, throughout the life of the project) reviews of living conditions of relocated communities in scenarios where housing or other related compensation agreements were made. [EHS and Energy Management Policy, 09/2023: static.trinasolar.com] • Not Met: Expectation for suppliers to publish reviews of living conditions of relocated communities: No evidence found, in the EHS and Energy Management Policy, that the Company expects upstream suppliers to publish regular (at least annually, throughout the life of the project) reviews of living conditions of relocated communities in scenarios where housing or other related compensation agreements were made. [EHS and Energy Management Policy, 09/2023: static.trinasolar.com] • Not Met: Describes approach in relation to relocation: No evidence found, in the EHS and Energy Management Policy, that it is expected to describe its approach in relation to all elements above, if the project developer or upstream supplier has not engaged in any projects involving physical and economic displacement. [EHS and Energy Management Policy, 09/2023: static.trinasolar.com]

F. Security and conflict-affected areas (incl. responsible mineral sourcing)

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> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to heightened HRDD in conflict affected areas: Trina Solar's 2022 Sustainability Report states that 'Trina Solar does not purchase or support the use of "conflict minerals". In 2015, we issued and implemented a Conflict Minerals Management Framework, which defined a 5-step process to identify potential conflict minerals in the materials we used. Meanwhile, we continued to promote key material suppliers to complete CMRT due diligence'. The Conflict Minerals Management Framework could not be found in publicly available sources. The Human Rights Principles states: 'We have a good understanding of conflict minerals requirements and work diligently with suppliers to promote sustainable development by way of ethical sourcing. Trina Solar formulates formal conflict minerals management policy and requires all suppliers to sign and apply it into their product chains to avoid any kind of conflict minerals, and deliver the requirement to downstream suppliers'. The Product Stewardship Policy notes: 'Trina Solar continuously keeps vigilant in its commitment to safeguard workers' rights in global supply chains. We commit to no use of child labor and forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor'. However, although it formulates formal conflict minerals management policy, no commitment to address the heightened human rights risks associated with operations in or sourcing from conflict-affected and/or high-risk areas found, in line with the recommendations of the UN Working Group on business and human rights. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens: The 2022 Sustainability Report notes: 'to ensure that products and projects meet customers' traceability requirements, we have established and implemented the Guidelines for Identification and Traceability Management, which set clear and unambiguous requirements for product identification management and traceability management after procurement, production, and delivery'. It also describes the Company's process of identifying 'Conflict Minerals': 'Determine the scope of products and suppliers - Review bill of materials for products to identify 3TG and corresponding suppliers; Perform a reasonable level of mineral origin investigation - Use supplier CMRT questionnaires to obtain the necessary information from suppliers to assess the source and sourcing of 3TG to meet conflict minerals reporting requirements; Conduct due diligence Conduct supplier control matrix risk assessment based on feedback from suppliers on country of origin surveys for reasonable levels of minerals - Each subsidiary submits its findings to the head office; Report the conflict mineral status of each subsidiary's product components as required by the template issued by the head office - Sort out the process - Sort out and ensure compliance with existing operational processes'. However, no details of the steps to mitigate this or other risks related with operating our sourcing from CAHRAs was found. [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How stakeholders are involved in the process to mitigate risks: The Human Rights Principles states: 'We have a good understanding of conflict minerals requirements and work diligently with suppliers to promote sustainable development by way of ethical sourcing. Trina Solar formulates formal conflict minerals management policy and requires all suppliers to sign and apply it into their product chains to avoid any kind of conflict minerals, and deliver the requirement to downstream suppliers'. The 2022 Sustainability Report explains its communication strategy: 'Through various communication channels, we regularly collect the views and suggestions of internal stakeholders such as employees and Management, as well as the expectations and responses of external stakeholders such as government and regulatory bodies, shareholders and investors, customers, suppliers and partners, media, community, and NGOs. The collected data is regularly summarize and feedback is provided to the Company's management. Targeted communications are also conducted'. The Company points out it is a member of the Solar Stewardship Initiative. However, it is not clear how it engages with stakeholders as part of its process to mitigate risks when operating in or sourcing from conflict-affected and/or high-risk areas regions. [2022 Sustainability Report, 2023: static.trinasolar.com]

F. Security and conflict-affected areas (incl. responsible mineral sourcing)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Expectations for clients to regularly conduct risk assessments regarding security forces: The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. • Not Met: Expectations for suppliers to regularly conduct risk assessments regarding security forces: The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. • Not Met: Regularly conducts risk assessment regarding security forces: The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expectation for clients to have commitment to Voluntary Principles on Security and HRs: The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. • Not Met: Expectation for suppliers to have commitment to Voluntary Principles on Security and HRs: The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. • Not Met: If applicable, discloses use of private security providers and uses only ICoCA members. <p>If direct employment of security, commitment to follow ICoCA itself.: The Human Rights Principles states: 'As embodied in Trina Solar Code of Business Conduct and Ethic and Supplier EHS Management Procedure, Trina Solar expects its suppliers to set up and maintain fair employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and regulations'. However, no evidence found that if the Company uses private security, it discloses that and commits to only contract companies that are signatories to the International Code of Conduct for Private Security Providers. If the Company directly employs its security, it commits to abiding by the International Code of Conduct itself. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com]</p>
F.3.M	Responsible sourcing of minerals: Arrangements with suppliers	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Statement on OECD Guidance aligned due diligence and requirement in contracts/codes with suppliers: The Human Rights Principles states: 'Trina Solar is committed to respecting internationally recognized human rights principles in our operations and throughout our value chain, including [...] Organization for Economic Co-operation and Development (OECD) [...]. As embodied in Trina Solar Code of Business Conduct and Ethic and Supplier EHS Management Procedure, Trina Solar expects its suppliers to set up and maintain fair employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and regulations. We have a good understanding of conflict minerals requirements and work diligently with suppliers to promote sustainable development by way of ethical sourcing. Trina Solar formulates formal conflict minerals management policy and requires all suppliers to sign and apply it into their product chains to avoid any kind of conflict minerals, and deliver the requirement to downstream suppliers'. However, it is not clear it that it undertakes due diligence in accordance with the OECD Guidance for Responsible Supply Chains of Minerals from CAHRAs. The Company is also expected to incorporate into commercial contracts/ written agreements with suppliers requirements to conduct due diligence in accordance with the OECD Guidance, which is not clear it is included into the Company's conflict minerals management policy, as it could not be found. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com]

F. Security and conflict-affected areas (incl. responsible mineral sourcing)

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes work with suppliers on risk assessment and improving DD: The 2022 Sustainability Report notes: 'Continuous and regular communication with suppliers is the foundation of Trina Solar's efforts to ensure supply chain synergy and agility. We provide training to suppliers through information sharing, online and offline coaching, etc. to help suppliers improve their capabilities in various aspects of social responsibility management. [...] We explicitly list the key audit requirements for labor human rights protection and occupational health and safety in the Supplier EHS Management Procedures to ensure unbiased supplier labor rights with clear audit and evaluation management procedures'. As for its Responsible Procurement, it notes: 'While adhering to its own high standards of business ethics, social, and environmental requirements, Trina Solar seeks to cooperate with suppliers who also follow high ethical standards and take social and environmental responsibility as their own. By continuously improving its supply chain management system and enhancing communication with suppliers and partners, Trina Solar continues to promote and improve its sustainable supply chain. [...] We have developed Trina Solar's Supplier Code of Conduct, Procurement Management Guidelines, and Supplier Classification and Grading Management Specifications to provide guidelines for full lifecycle supplier management. At the same time, we have published the Code of Business Conduct to demonstrate Trina Solar's business cooperation standards to all partners, to clarify the requirements of the code of conduct and to provide a reference for daily management'. However, no description found on how it proactively works with suppliers to contribute to building their capacity in risk assessment and improving their due diligence performance in responsible minerals sourcing. [2022 Sustainability Report, 2023: static.trinasolar.com] Score 2 • Not Met: Disclosure of supply chain mapping
F.4.M	Responsible sourcing of minerals: Risk identification in mineral supply chains	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes risk identification and disclosure in line with OECD Guidance: The 2022 Sustainability Report states that 'Trina Solar does not purchase or support the use of "conflict minerals". In 2015, we issued and implemented a Conflict Minerals Management Framework, which defined a 5-step process to identify potential conflict minerals in the materials we used. Meanwhile, we continued to promote key material suppliers to complete CMRT due diligence'. It explains its Sustainable Materiality Matrix: 'Trina Solar effectively identifies sustainable issues in the context of the Company's own business characteristics and external environmental policy changes, and organically integrates the demands and expectations of stakeholders into its strategic planning and business layout'. Additionally, it discloses the matrix. However, no description found of its processes for identifying and prioritising risks and impacts in its mineral supply chain as set out in the OECD Guidance. The Company is also expected to disclose the risks identified. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Describes process to identify smelters/refiners and assessment of whether these carried out due diligence in accordance with OECD Guidance: The 2022 Sustainability Report notes: 'we require all suppliers and partners to sign the Trina Solar Supplier Social Responsibility Commitment during the supplier entry process, in which they clearly understand the full Trina Solar Supplier Code of Conduct, including labor protection, and confirm their agreement to comply with it'. The Product Stewardship Policy notes: 'Trina Solar continuously keeps vigilant in its commitment to safeguard workers' rights in global supply chains. We commit to no use of child labor and forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor'. However, no description found of its processes to identify the smelters/refiners in its supply chain and to assess whether the smelters/refiners have carried out due diligence processes in accordance with the OECD Guidance. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. It has provided additional comments regarding this indicator, however, its content has not been found in publicly available sources. [2022 Sustainability Report, 2023: static.trinasolar.com]

F. Security and conflict-affected areas (incl. responsible mineral sourcing)

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners assessed in line with OECD Guidance: The 2022 Sustainability Report notes: 'During the Reporting Period, Trina Solar newly established and implemented the Supplier Performance Management'. It also explains its Responsible Procurement and describes the Company's process of identifying 'Conflict Minerals'. However, this subindicator looks for discloses the list of all the qualified smelters/refiners in its supply chain that it has independently judged to conform to the due diligence processes set out in the OECD Guidance. No further evidence found. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Risk identification process covers all minerals: The 2022 Sustainability Report notes: 'Trina Solar effectively identifies sustainable issues in the context of the Company's own business characteristics and external environmental policy changes, and organically integrates the demands and expectations of stakeholders into its strategic planning and business layout'. It discloses its materiality matrix. It also reports on its approach to Business Ethics and Anti-Corruption as well as on its whistle-blowing channels. However, no evidence found that the risk identification processes and disclosures, in its mineral supply chain, cover all minerals. [2022 Sustainability Report, 2023: static.trinasolar.com]
F.5.M	Responsible sourcing of minerals: Risk management in the mineral supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Steps taken to respond to risks in mineral supply chain: Trina Solar's 2022 Sustainability Report states that "Trina Solar does not purchase or support the use of "conflict minerals". In 2015, we issued and implemented a Conflict Minerals Management Framework, which defined a 5-step process to identify potential conflict minerals in the materials we used. Meanwhile, we continued to promote key material suppliers to complete CMRT due diligence'. However, this subindicator looks for a description of specific steps taken to handle to risks identified in relation to mineral sourcing, which could include a summary of the risk management plan. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Description of process to monitor performance of risk mitigation measures: The 2022 Sustainability Report describes the Company's process of identifying 'Conflict Minerals': 'Determine the scope of products and suppliers - Review bill of materials for products to identify 3TG and corresponding suppliers; Perform a reasonable level of mineral origin investigation - Use supplier CMRT questionnaires to obtain the necessary information from suppliers to assess the source and sourcing of 3TG to meet conflict minerals reporting requirements; Conduct due diligence Conduct supplier control matrix risk assessment based on feedback from suppliers on country of origin surveys for reasonable levels of minerals - Each subsidiary submits its findings to the head office; Report the conflict mineral status of each subsidiary's product components as required by the template issued by the head office - Sort out the process - Sort out and ensure compliance with existing operational processes'. However, no description of the steps taken to manage and respond to risks in its mineral supply chain (which could include a summary of the risk management plan) found and how it monitors performance of those eventual measures. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. It has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Disclosure of significant improvements over time: The 2022 Sustainability Report notes: 'By the end of March 2023, a total of 111 suppliers of main and auxiliary materials had signed "the Trina Solar Supplier Social Responsibility Commitment" and completed the supplier EHS and social responsibility self-assessment'. As for its Sustainable Materiality Matrix, it explains: 'Trina Solar effectively identifies sustainable issues in the context of the Company's own business characteristics and external environmental policy changes, and organically integrates the demands and expectations of stakeholders into its strategic planning and business layout'. It then discloses its Materiality Matrix. However, this subindicator looks for evidence of whether there has been significant improvement in risk prevention/mitigation, in its mineral supply chain, over time. No further evidence found. [2022 Sustainability Report, 2023: static.trinasolar.com]

F. Security and conflict-affected areas (incl. responsible mineral sourcing)

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How suppliers and affected stakeholders engaged on strategy: The 2022 Sustainability Report notes: 'Continuous and regular communication with suppliers is the foundation of Trina Solar's efforts to ensure supply chain synergy and agility. We provide training to suppliers through information sharing, online and offline coaching, etc. to help suppliers improve their capabilities in various aspects of social responsibility management'. However, no further description found of how it engages with suppliers and affected stakeholders to agree on its strategy for risk management, in its mineral supply chain. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Processes cover all minerals: The 2021 Environmental, Social and Governance (ESG) Report indicates '[t]in-plated copper tape is used in producing PV modules. When we use materials involving tin-coated tape, junction boxes and terminals, or lead-free tin wire, we need suppliers to trace the origin of the minerals. Trina Solar has taken active actions since we realized that conflict minerals may enter our supply chain. Trina Solar attaches great importance to the issue of conflict minerals. We actively formulate the Management Plan for Conflict Minerals of Trina Solar, which states that Trina Solar neither purchases nor supports the use of conflict minerals, establish the management system, carry out supply chain conflict mineral investigation and identify mineral sources, and conduct conflict minerals training for key cooperative suppliers'. The 2022 Sustainability Report notes: 'we require all suppliers and partners to sign the Trina Solar Supplier Social Responsibility Commitment during the supplier entry process, in which they clearly understand the full Trina Solar Supplier Code of Conduct, including labor protection, and confirm their agreement to comply with it'. It also explains its process for identifying Conflict Minerals, as explained above. The Product Stewardship Policy adds: 'Trina Solar actively strives to develop new raw materials and products in a responsible manner by assessing their risks for current and future generations. We commit to conflict-free materials and products, and work diligently to promote sustainable development by way of ethical and green sourcing'. However, no evidence found of risk management and response processes which covers all minerals. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. It has also provided comments regarding this indicator, however, its content has not been found in publicly available sources. [2021 ESG Report, 2022: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com]

G. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.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> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs: No evidence found, in the Human Rights Principles, of a commitment to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders, in particular. The Company has provided a document regarding this indicator, the Employee Handbook, which could not be publicly found. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Expectation on business partners in value chain to make this commitment: No expectation of a commitment for suppliers not to tolerate attacks or intimidation against human rights defenders found in the Human Rights Principles. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Description of how working with HRDs to create safe and enabling environment: The Human Rights Principles explains its harassment prohibition approach: 'Trina Solar employees are required to treat co-workers, customers, and suppliers with dignity. Trina Solar is committed to providing a workplace free of harassment. We do not tolerate either harassment behavior or any other form of unethical business practice'. The 2022 Sustainability Report discloses information on workplace injury prevention capacity building project. However, no description found on how it works with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.M	Health and safety	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Discloses quantitative information on H&S in own operations (injury rate or lost days and fatalities) in last reporting period: Trina Solar's 2022 Sustainability Report states that "In 2022, we had no work-related fatalities among our employees, of which we had a TRR of 0.324, representing an 17% reduction from the previous year; there were a total of 171 working days lost due to work-related injuries." [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Expects disclosure of H&S information of relevant business relationships: The Company has provided documents regarding this indicator, the EHS Accident Investigation & Management Procedure and the Contractor EHS Management Procedure, which could not be publicly found. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Sets targets for H&S performance (including injury rates or lost days and fatalities): The 2022 Sustainability Report notes: 'Trina Solar's Chinese and overseas factories have institutionalized occupational health and safety management and have all obtained ISO 45001 occupational health and safety management system certification'. However, not evidence found of targets related to injury rates or lost days (or near miss frequency rate) and fatalities and for the last reporting period. The Company has provided a document regarding this indicator, the 2022 OH&S Performance Report, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Met targets or explains why not or how improve H&S management systems: Trina Solar's Commitment to Sustainable and Responsible Purchasing outlines the Company's supplier selection process and its evaluation criteria including 'Health and safety: Ensuring suppliers have valid health and safety licenses, they provide employees with a healthy and safe workplace, and they reduce accidents, injuries and occupational health hazards'. However, it is not clear if the Company met H&S targets. The Company has provided a document regarding this indicator, the 2022 OH&S Performance Report, which could not be publicly found. [COMMITMENT TO SUSTAINABLE AND RESPONSIBLE PURCHASING, N/A: static.trinasolar.com]
H.2.M	Forced labour risk management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</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: The Product Stewardship Policy notes: 'Trina Solar continuously keeps vigilant in its commitment to safeguard workers' rights in global supply chains. We commit to no use of child labor and forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor'. The Policy is signed by the Chairman & CEO of Trina Solar. The 2022 Sustainability Report adds: 'Trina Solar has established an ESG Working Group, comprised of senior executives with extensive industry and governance experience, to ensure effective oversight of the Company's sustainability issues and objectives'. However, no evidence found it has tasked a Board member or Board Committee with oversight of its supply chain policies that address forced labour, and describes how the experiences of affected workers or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [Product Stewardship Policy, 20/01/23: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Suppliers to have these arrangements in place: The Product Stewardship Policy notes: 'Trina Solar continuously keeps vigilant in its commitment to safeguard workers' rights in global supply chains. We commit to no use of child labor and forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor'. The 2022 Sustainability Report adds: 'we require all suppliers and partners to sign the Trina Solar Supplier Social Responsibility Commitment during the supplier entry process, in which they clearly understand the full Trina Solar Supplier Code of Conduct, including labor protection, and confirm their agreement to comply with it'. However, no evidence found it expects suppliers to have a Board member or Board Committee tasked with oversight of its supply chain policies that address forced labour, and describes how the experiences of affected workers or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [Product Stewardship Policy, 20/01/23: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: According to the 2022 Sustainability Report, 'Trina Solar has defined a "zero tolerance" policy for child labor and forced labor in the Trina Solar Employee Handbook, the Human Resources Recruitment and Employment Management System, and other internal rules and regulations, and actively protects the basic rights and interests of employees through information audits, background checks by internal or third-party organizations, and regulations on working hours and overtime approval processes. We strictly follow the laws and regulations of China and our operating regions and the provisions of the Trina Solar Employee Handbook, and do not use child labor and strictly prohibit forced labor. In addition, we have incorporated social issues such as child labor, overtime work, and human rights into our supplier social responsibility assessment methods and supervise our suppliers to refrain from employing child labor and forced labor. In 2022, Trina Solar did not have any incidents of child labor, forced labor, or other violations'. It adds: 'We explicitly list the key audit requirements for labor human rights protection and occupational health and safety in the Supplier EHS Management Procedures to ensure unbiased supplier labor rights with clear audit and evaluation management procedures'. It explains its project carried out with suppliers: the Supply Chain Injury Prevention Capacity Building Project. However, no evidence of ongoing efforts to prevent and mitigate forced labour in its operations and supply chain found (for example through capacity building and/or collaboration with others). The Company has provided a document regarding this indicator, the Hazard Identification and Risk Assessment Procedure, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com] • Met: Factors to be considered when ending a business relationship: The 2022 Sustainability Report notes: 'We evaluate suppliers in various aspects such as technology, quality, delivery, service, cost, innovation, social responsibility, safety, and environment according to their categories and with different weights. Furthermore, we complete an assessment and recognition of suppliers based on the evaluation results, while carrying out targeted communication and counselling, and gradually restricting procurement, freezing and eliminating suppliers that fail to improve in the long run'. As described above, forced labour is among the issues covered. [2022 Sustainability Report, 2023: static.trinasolar.com]
H.3.M	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Pays workers regularly, in full and on time: The 2022 Sustainability Report notes: 'We strictly abide by the relevant wage management laws and regulations in each place of operation, and also set up a Human Resources Management Committee (HRC), which is committed to continuously optimizing a fair, just and reasonable compensation and benefits management system'. However, no evidence found that it pays workers (whether directly employed or contracted) in full and on time. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Payslips show wages and legitimate deductions: The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Description of implementation and monitoring of this practice: The 2022 Sustainability Report notes: 'We strictly abide by the relevant wage management laws and regulations in each place of operation, and also set up a Human Resources Management Committee (HRC), which is committed to continuously optimizing a fair, just and reasonable compensation and benefits management system'. However, no description found of how it implements and monitors this practice in full and on time; providing workers with a payslip], particularly with employment agencies/labour brokers/ recruitment intermediaries. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Assessment scope of failure to pay workers directly in supply chain: The 2022 Sustainability Report notes: 'We explicitly list the key audit requirements for labor human rights protection and occupational health and safety in the Supplier EHS Management Procedures to ensure unbiased supplier labor rights with clear audit and evaluation management procedures'. No assessment of the number affected by (scope of) failure to pay directly, in full and on time in its supply chain found. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Analysis of trends demonstrating progress: The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources.
H.4.M	Prohibition of forced labour: Restrictions on workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Does not retain documents or restrict movement of workers: The EHS and Energy Management Policy notes: 'We pay attention to employees' health & safety and sustainable development. We are dedicated to creating a safe, healthy and environmentally-friendly workplace for employees and a harmonious green planet for mankind'. The Human Rights Principles states: 'Trina Solar will not use or tolerate the use of forced, debt bonded, indentured labor, involuntary prison labor, slavery, or human trafficking in its business or supply chain'. However, no evidence found indicating it does not retain workers' personal documents or restrict workers' freedom of movement or require workers to use company provided accommodation. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [EHS and Energy Management Policy, 09/2023: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Describes working with suppliers on free movement of workers: The Human Rights Principles states: 'Trina Solar will not use or tolerate the use of forced, debt bonded, indentured labor, involuntary prison labor, slavery, or human trafficking in its business or supply chain'. However, no description found of how it proactively works with its supply chain to eliminate retention of workers' documents or other actions to physically restrict movement. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Description of implementation and monitoring of this practice: The 2022 Sustainability Report notes: 'We explicitly list the key audit requirements for labor human rights protection and occupational health and safety in the Supplier EHS Management Procedures to ensure unbiased supplier labor rights with clear audit and evaluation management procedures. [...] 'we require all suppliers and partners to sign the Trina Solar Supplier Social Responsibility Commitment during the supplier entry process, in which they clearly understand the full Trina Solar Supplier Code of Conduct, including labor protection, and confirm their agreement to comply with it'. However, no description found of how it implements and checks this practice [of not retain workers' personal documents or restrict workers' freedom of movement or require workers to use company provided accommodation], particularly with employment agencies/labour brokers/ recruitment intermediaries, labour brokers/recruitment intermediaries. The Company has provided a document regarding this indicator, the EHS Management System & CSR Internal Audit Management Procedure, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.5.M	Freedom of association and collective bargaining	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The document Trina Solar's Commitment to Sustainable and Responsible Purchasing outlines the Company's supplier selection process and its evaluation criteria including 'Free association and collective negotiation: Ensuring suppliers respect their employees' rights to join, organize or not join labor unions'. The Human Rights Principles states: 'Freedom of association is the right of workers to freely form and join workers' organizations such as labor union, and worker committee for the promotion and defence of occupational interests. Collective bargaining is the negotiation of wages and other conditions of employment by an organized body of employees. As outlined in Trina Solar Code of Conduct, Trina Solar respects those rights. We are committed to treating our employees with dignity and respect and striving to create an environment of open communication where employees can freely speak with their managers about their ideas, concerns or problems. We encourage our employees to share their ideas, concerns, or suggestions through an environment of cooperation and teamwork'. The 2022 Sustainability Report notes: 'We explicitly list the key audit requirements for labor human rights protection [...] in the Supplier EHS Management Procedures to ensure unbiased supplier labor rights with clear audit and evaluation management procedures'. It adds: 'We pay attention and refer to international human rights conventions and labor standards such as the United Nations Guiding Principles on Business and Human Rights, and develop and continuously improve our internal rules and regulations. We have incorporated the protection of human rights and labor rights into the Trina Solar Code of Business Conduct and Ethics for Employees and the Supplier Performance Management Code'. Finally, 'Trina Solar strictly follows the Trade Union Law of the People's Republic of China and respects employees' rights to participate in independent labor unions, collective bargaining and freedom of association'. However, no evidence found it prohibits intimidation, harassment, retaliation and violence against trade union members or equivalent worker bodies and trade union representatives both in its own operations as well as in contractual arrangements with its suppliers or supplier code of conduct. Moreover, it is not clear the lack of respect for the right of all workers to form and join a trade union of their choice is a red flag for business relationships and that the lack of respect for those rights would prevent a potential supplier from becoming an official supplier. [COMMITMENT TO SUSTAINABLE AND RESPONSIBLE PURCHASING, N/A: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Describes work with suppliers on FoA/CB: The 2022 Sustainability Report explains its Supplier Environmental and Social Performance Assessment: 'Our publicly available Code of Business Conduct emphasizes the requirements and constraints on environmental and social standards of conduct for all suppliers, and provides reporting channels to encourage mutual monitoring. We have established and implemented the Supplier EHS Management Procedure, which specifies that procurement staff should record the relevant supplier performance in the Supplier EHS and Social Responsibility Form, and conduct annual supplier EHS and social responsibility audit scores'. It provides further information on its responsible procurement approach. However, no description found of how it proactively works to support the practices of its suppliers in relation to freedom of association and collective bargaining. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain: The Company makes reference to its commitment to Freedom of Association and Collective Bargaining found in the Global Human Rights Principles [see above]. However, no assessment of the number affected by (scope of) restrictions to freedom of association or collective bargaining in its supply chain found. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Analysis of trends demonstrating progress: The 2022 Sustainability Report notes: 'Trina Solar strictly follows the Trade Union Law of the People's Republic of China and respects employees' rights to participate in independent labor unions, collective bargaining and freedom of association. We have established labor union committees and employee representative assemblies to protect the legitimate rights and interests of our employees. All Chinese employees of the Company are already members of the labor union. We hold annual staff meetings and consult with the trade unions before introducing internal systems. The union has set up an internal library (Changzhou Library Branch) and conducts monthly salon-type activities such as " Good Book Recommendation"; we have also set up a sports club to promote the balance of work and rest for our employees and regularly hold various sports activities to enrich their spare time'. However, no analysis of trends demonstrating progress found. [2022 Sustainability Report, 2023: static.trinasolar.com]
H.6.M	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: The 2022 Sustainability Report lists 'Comply with legal wage payment requirements (including interns)' as one of the 'Requirements for Labor Human Rights and Occupational Health and Safety for Trina Solar Suppliers'. The Human Rights Principles states: 'Trina Solar pays employee compensation which meets, as minimum, or exceeds the requirements of applicable law, including those related to minimum wages, overtimes, and legally mandated benefits'. However, it is not clear it includes requirements to pay workers a living wage in its contractual arrangements with suppliers or supplier code of conduct. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Describes work with suppliers on living wage: See above. However, no description found of how it works to support the payment of a living wage in its supply chain. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: The company provides evidence that its suppliers pay a living wage: See above. However, no evidence found the company provides evidence that its suppliers pay a living wage. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Requirement for suppliers to regularly review definition of living wages with relevant trade unions: The 2022 Sustainability Report notes: 'We provide good compensation and benefits for our employees, insist on the combination of short-term and long-term incentives, set salaries based on market-oriented principles, implement employee equity incentive plans, and encourage employees to be active and enterprising through diversified ways. We strictly abide by the relevant wage management laws and regulations in each place of operation, and also set up a Human Resources Management Committee (HRC), which is committed to continuously optimizing a fair, just and reasonable compensation and benefits management system'. However, no evidence found that it requires suppliers to regularly reviews its definition of a living wage including with relevant trade unions (or equivalent worker bodies where the rights to freedom of association and collective bargaining are restricted under law). The Company has provided a document regarding this indicator, the Trina Solar Employee Hand Book, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com]

I. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.M	Environmental impact assessment and remediation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to only supply projects that conduct public EIA and CIA: The 2022 Sustainability Report notes: 'we established and carried out various environmental management systems, including the [...] Construction Project EHS Management Procedure'. It adds: 'As early as the site selection stage, we perform the environmental impact assessment and take local water resources into consideration. During the Reporting Period, our newly built Inner Mongolia base, Suqian Silicon Materials, Yancheng New Energy, Huaian Technology and Qinghai Silicon production base obtained the environmental impact assessment reports issued by third-party institutions'. However, this subindicator looks for a commitment to only supply projects that provide evidence of a public environmental impact assessments and cumulative impact assessment. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to only supply projects that guarantee compensation for environment and people affected: The EHS and Energy Management Policy notes: 'We pay attention to employees' health & safety and sustainable development. We are dedicated to creating a safe, healthy and environmentally-friendly workplace for employees and a harmonious green planet for mankind. We promise to use energy and natural resources responsibly and efficiently, and participate in global carbon reduction initiatives'. The 2021 ESG Report provides further information on its environment and natural resources management, including: 'Trina Solar has constructed a number of complementary solar power projects on fishing farm and agricultural facilities without changing the original use of the land, which is not only benefit to the protection of the ecological environment and alleviating land-use conflicts, but also renewable energy supply, and create dual value. Our projects provide clean and green energy to the communities'. However, no evidence found it commits to only supplying projects that have a system in place to guarantee the payment for environmental restoration or compensations to people who may suffer from Company operations. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [EHS and Energy Management Policy, 09/2023: static.trinasolar.com] & [2021 ESG Report, 2022: static.trinasolar.com]
I.2.M	Life cycle assessment	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Conducts regular public life cycle assessments (including risks related to raw material sourcing, waste, and decommissioning): Trina Solar's 2022 Sustainability Report states that "The Life Cycle Assessment is based on the life cycle assessment methods and requirements of ISO 14040/ISO 14044, and is a scientific and rigorous test of the evaluation targets. Based on the LCA, Trina Solar has conducted a comprehensive analysis of more than ten indicators that affect the global ecological environment, including energy consumption, raw material consumption, acid rain, eutrophication, environmental toxins, waste, and other thousands of substances collected from the Vertex modules." [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Action plans to address adverse impacts identified: The 2022 Sustainability Report notes: 'Trina Solar has formulated and regularly updated the Greenhouse Gas Data and Quality Management Procedures and actively promoted the process of carbon inventory and carbon foot printing to provide transparent and scientific verification data for the low-carbon development of the Company and for when undertaking environmental and climate-responsive responsibilities. All of the Company's PV manufacturing factories in China and overseas have conducted GHG inventories in accordance with ISO 14064 and obtained third-party data certification'. However, no evidence found of action plans in place to address potential adverse impacts identified during life cycle assessments. [2022 Sustainability Report, 2023: static.trinasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Reports on progress made on action plan (including recycling/end-of-life): The Company reports on Trina Solar's Greenhouse Gas Emission Performance From 2020 to 2022. It includes metrics on: Operating Scope Emissions (million tons of CO₂e); Incl. Scope I Emissions (million tons of CO₂e); Scope II Emissions (tCO₂e); Cell: GHG emissions intensity per unit of output (tCO₂e/MW); Module: GHG emissions intensity per unit of production (tCO₂e/MW); Value chain emissions (tCO₂e). It also reports on its Trina Solar's Carbon Emission Management Targets. However, it is not clear it reports on progress made on the action plan [based on its life cycle assessment]. This should include recycling/end-of life. [2022 Sustainability Report, 2023: static.trinasolar.com]

J. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.M	Anti-corruption due diligence and reporting	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to prohibiting bribes to public officials: No clear reference to the bribery of public officials. Trina Solar's 2022 Sustainability Report states that 'Trina Solar adheres to a "zero tolerance" attitude toward all violations of business ethics, makes every effort to establish an internal management system and a monitoring and reporting mechanism, continuously improves its compliance management system, regularly conducts compliance education and training for all employees, vigorously promotes a culture of integrity, and severely prosecutes corruption in all business activities. Trina Solar strictly abides by the laws and regulations related to business ethics in its operating locations, and also formulates and strictly implements compliance management systems such as the Code of Business Conduct and Ethics, the Anti-Monopoly Compliance Policy, the Anti-Corruption Management System Policy, and the Company Reporting Rewards Management Measures. We emphasize the principle of "zero tolerance" for business ethics and anti-corruption, and carry out business ethics management from multiple dimensions. At the same time, we have established clear regulations for all employees and contract workers of the Company establishing how to interact with contractors, suppliers, customers, and third-party partners involving corruption, conflicts of interest, gifts, and gratuities, and the use and protection of the Company's assets'. No further evidence found in the Company's Compliance Information Reporting Platform. The Company has provided a document regarding this indicator, the Code of Business Conduct and Ethics, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Compliance Information Reporting Platform_web, N/A: wb.trinasolar.com:8090] • Not Met: Expectation extends to relevant business relationships: The 2022 Sustainability Report states that 'Supplier Anti-Corruption Management: Through the Trina Solar Supplier Code of Conduct, the Social Responsibility Management Code and the Supplier Management System, Trina Solar conducts anti-corruption management for suppliers in three aspects: management requirements, assessment and supervision, and training and incentives. In 2022, based on our supplier compliance training program, we conducted compliance training for suppliers on anti-corruption and anti-bribery. We introduced Trina Solar's compliance management philosophy and compliance requirements to suppliers, emphasized the main items to pay attention to in the procurement process, introduced in detail the concept of conflict of interest and related legal backchannels, and explained the ways to report violations'. It adds: 'we have established clear regulations for all employees and contract workers of the Company establishing how to interact with contractors, suppliers, customers, and third-party partners involving corruption, conflicts of interest, gifts, and gratuities, and the use and protection of the Company's assets'. Also, 'In order to protect the legitimate interests of the Company, support and protect the reporting behaviour of whistle-blowers and ensure that violations are independently, objectively, and impartially investigated and dealt with, an open, transparent, and unobstructed reporting and investigation procedure, a management communication mechanism and a reward and punishment mechanism have been established in the Company Reporting Rewards Management Measures to encourage employees, customers, suppliers and other stakeholders to report possible misconduct of which they are aware'. However, it is not clear the Company expects to all relevant suppliers, contractors, subcontractors, and other business relationships to commits to the principles outlined in the OECD Convention on Combatting Bribery of Foreign Public Officials in International Business Transactions including, at a minimum, prohibiting bribes to public officials. [2022 Sustainability Report, 2023: static.trinasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Reports that no such complaints were made: The 2022 Sustainability Report notes: 'In 2022, Trina Solar did not have any lawsuits or cases involving corruption or violation of business ethics'. [2022 Sustainability Report, 2023: static.trinasolar.com]
J.2.M	Payments to governments & contract transparency	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Publishing a tax CbCR in line with GRI 207-4, or expecting project developers clients to disclose payments to governments at project level (including on land and natural resources): No information has been identified in the Company's public reports and policies. In future assessments, the Company will be expected to demonstrate. it publishes a tax CbCR and expects project developers clients to report on its payments to governments at project level, including for purchase or rent of land or natural resources related to their renewable energy projects. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Disclosure of terms, contracts, agreements for those payments: No evidence found of the terms, contracts and/or agreements under which those payments to governments were made. Only openly available pieces of evidence are considered valid. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Expectation for business relationships to disclose this information: No evidence found it expects its relevant suppliers, contractors, subcontractors, and other business relationships to disclose this information [payments made to governments at project-level and the terms, contracts and/or agreements under which those payments were made]. [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI: No evidence found of a declaration of support for governments to publicly disclose contracts and licenses that govern renewable energy projects in line with the EITI Standard. The Company has made reference to documents regarding this indicator, the Code of Business Conduct and Ethics and the Anti-corruption Policy, which could not be publicly found.

K. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.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> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190: The Human Rights Principles states: 'Trina Solar values diversity in our workforce, as well as in our customers, suppliers, and other stakeholders. We provide equal employment opportunity for all applicants and employees. We do not discriminate on the basis of race, color, religious creed, gender, national origin, age, physical or mental disability, marital status, pregnancy, or any other characteristic protected by local law, regulation or ordinance'. The 2022 Sustainability Report notes: 'Through a series of trainings and awareness-raising programs, we ensure that employees all over the world study and understand Trina Solar's requirements and attitudes toward anti-discrimination, anti-harassment, and diversity'. Regarding its the Rising Sun Program, it indicates: 'we provide diverse and informative onboarding training for new talents, expecting them to understand Trina Solar's core values as early as possible, realize the role change from campus students to Trina Solar employees, and master and apply basic skills. During the Reporting Period, we provided 7 sessions of new employee training courses of the Rising Sun Program for incoming freshmen. [...] Among them, a special session was opened for the Qinghai base to help the new base construction and cultural integration. The overall satisfaction of the trainees with the training course reached 4.78 points (on a 5-point scale)'. However, it is not clear it provides mandatory and regular (at least annual) in person, virtual, and/or written training, to its staff on all types of contracts on equality, equity, diversity, anti-discrimination (including gender-based violence), as actual evidence of performance found seems to focus in new employees. The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requires suppliers to do the same: See above. However, no evidence was found that the Company requires suppliers to provide mandatory and annual training as per ILO convention 190 to its staffs in all types of contracts on equality and anti-discrimination and the policies and mechanisms for addressing it. The

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com]</p> <ul style="list-style-type: none"> • Not Met: Provides materials and access to resources for trainings: See above for information on the Rising Sun Program. As for talent training, it indicates: 'In order to strengthen the talent pool and talent ladder construction, Trina Solar continues to improve the Training Management System, enhance the internal training system, and provide highly job appropriate training courses for department supervisors, general employees, new employees, trainees and other groups, covering compliance training, safety knowledge training, professional quality ability training, professional ability training, leadership training, and other content to continuously improve the knowledge and business ability of employees'. However, no evidence found that it provides materials and access to relevant resources [Diversity, Equality and Inclusion related] for those who will be conducting trainings. The Company has provided a document regarding this indicator, the 2022 training notification, which could not be publicly found. [2022 Sustainability Report, 2023: static.trinasolar.com]
K.2.M	Gender balance and sensitivity	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain: The 2022 Sustainability Report notes: 'Trina Solar attaches great importance to the diversity of the Board of Directors, and continues to build a diverse and professional Board of Directors in multiple dimensions such as gender [...], in order to improve corporate decision-making and enhance the effectiveness of the Board of Directors with a comprehensive and integrated perspective and concept'. Also, 'We are actively committed to building a diverse, equal and inclusive corporate culture. In the Trina Solar Code of Business Conduct and Ethics for Employees, we explicitly and firmly oppose to any form of discrimination, intimidation, harassment and other disciplinary actions, provide equal and diverse career development paths for our employees, commit to eliminating discrimination in terms of gender [...] in the hiring, promotion, training, and termination of employees, ensuring that all employees enjoy open, fair, and just job opportunities. Through a series of trainings and awareness-raising programs, we ensure that employees all over the world study and understand Trina Solar's requirements and attitudes toward anti-discrimination, anti-harassment, and diversity'. The Human Rights Principles states: 'Trina Solar values diversity in our workforce, as well as in our customers, suppliers, and other stakeholders. We provide equal employment opportunity for all applicants and employees. We do not discriminate on the basis of [...] gender, [...] pregnancy, or any other characteristic protected by local law, regulation or ordinance'. However, no evidence found it commits to and adopts a timebound action plan to integrate a gender lens to human rights policies and practices including its human rights due diligence process, risk management and remedy. Including its value chain. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Demonstrates progress through annual reporting: The 2022 Sustainability Report notes: 'Trina Solar has a global footprint and actively engages with talents from diverse educational, ethnic, and national backgrounds. As of the end of the Reporting Period, Trina Solar had a total of 23,077 officially contracted employees, with 30% female employees; 2,592 foreign employees; 308 ethnic minority employees; and 28 employees with disabilities, achieving a diverse employment policy'. However, no evidence found of progress against it [towards gender sensitive approaches in its human rights policies and practices] through regular (at least annual) reporting. [2022 Sustainability Report, 2023: static.trinasolar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Women and non-binary people make up at least 40% of the Company's board of directors and executives, or executive board: Not met but Trina Solar's 2022 Sustainability Report indicates that in the last reporting period there were 6,954 female employees, making up 30.13% of the workforce. The report also states that "Trina Solar attaches great importance to the diversity of the Board of Directors, and continues to build a diverse and professional Board of Directors in multiple dimensions such as gender, age, culture and educational background, professional development, tenure of service, industry experience, and understanding of Trina Solar, in order to improve corporate decision-making and enhance the effectiveness of the Board of Directors with a comprehensive and integrated perspective and concept." [2022 Sustainability Report, 2023: static.trinasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.3.M	Gender wage gap reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Has closed gender wage gap: The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. No evidence found that it has already closed the gender wage gap. This subindicator looks for evidence in relation to pay gap, rather than equal pay for equal work, gender pay gap being the difference in average gross hourly earnings between women and men. • Not Met: Timebound commitment to close gender wage gap • Not Met: Reports information at company level across multiple pay bands: The Company has provided comments regarding this indicator, however, its content has not been found in publicly available sources. However, no reporting on gender wage gap information at the Company level across multiple pay bands found. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects business relationships to do the same: The Human Rights Principles states: 'Trina Solar values diversity in our workforce, as well as in our customers, suppliers, and other stakeholders. We provide equal employment opportunity for all applicants and employees. We do not discriminate on the basis of [...] gender, [...] pregnancy, or any other characteristic protected by local law, regulation or ordinance'. However, it is not clear it extends the expectation [to demonstrate that it has already closed the gender wage gap or that it has a timebound commitment for closing the gender wage gap and to report on gender wage gap information at the company level across multiple pay bands] to all relevant suppliers, contractors, subcontractors, and other business relationships. The Company has provided a document regarding this indicator, the Supplier EHS & CSR Management Procedure, which could not be publicly found. [Global Human Rights Principles, 30/09/2022: static.trinasolar.com]

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. • 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

M. Responses to Serious Allegations (20% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<p>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] [Sheffield Hallam University, May 2021, "In Broad Daylight - Uyghur Forced Labour and Global Solar Supply Chains": shu.ac.uk] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar value chain vulnerable to alleged forced labour in Uyghur Region, says major study": business-humanrights.org]</p>
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	<ul style="list-style-type: none"> Not Met: A Company spokesperson is quoted by Reuters stating 'Trina's data systems and supply chain management allow us to provide detailed traceability documentation, upon request by the U.S. Customs'. However, this does not indicate independently verified disclosure of the Company's full solar supply chain. [Reuters, 07/03/2023, Exclusive: U.S. solar panel imports from China grow, alleviating gridlock, officials say": reuters.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).2	<p>If mapping identifies suppliers linked to regions where there is a high risk of forced labour including those identified by UN bodies, 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). The company indicates that this information is relevant to all destination markets.</p> <p>•Note: Any disengagement needs to be verified and decision-making to continue engagement with “crucial business relationships” in high-risk area needs to be explained, in line with OHCHR Guidance on Business & Human Rights in Challenging Contexts: “Where a business enterprise has determined that a relationship is indeed “crucial” within the meaning of Guiding Principle 19, and that it will be continuing with the relationship on that basis, it should be transparent with stakeholders and the public at large about the decision-making process used to arrive at that determination and the criteria used, which should be objectively reasonable.”</p>	0	<p>• Not Met: The Company states that 'Trina recently announced the expansion of its operations to include a state-of-the-art 6.5 GW wafer facility in Vietnam. The facility recently rolled off its first batch of 210mm ingot, with full-scale operation expected by October this year. The wafers produced are primarily used in cell and module production at Trina Solar's sites in Southeast Asia, including Trina's supply to the U.S. market. The investment for the new facility was made in advance of the DOC's recent shift in policy and demonstrates Trina's commitment to supply chain diversification and compliance. Since 2021, Trina has used only non-Chinese polysilicon for solar modules imported into the U.S. market. Due to these efforts, Trina is the first — and still the only — company to achieve a fully independent supply chain outside of China by using EU and U.S.-sourced polysilicon and manufacturing wafers, cells, and modules in Southeast Asia (SEA).' However, the statement is not sufficient evidence for full, verified disengagement as outlined in the indicator. In addition, no information was found on whether the Company has conducted an assessment of severity of risks, leverage and crucial nature of business relationships. Note: Any disengagement needs to be verified and/or decision-making to continue engagement with “crucial business relationships” in high-risk area needs to be explained, in line with OHCHR Guidance on Business & Human Rights in Challenging Contexts. [Trina Solar complies with UFLPA and ADCVD for all US solar module imports, 2023: trinasolar.com] [See also: Trina Solar response, 2023]</p>

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 September 2023[‡].

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 2023 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 electric utilities 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: 30 June 2023 for companies that did not engage with the benchmark; the expiration of the feedback period (between Aug/Sep 2023) for companies that engaged with the benchmark.

[‡] Further outreach and engagement with a subset of companies on the specific issue of exposure to forced labour risks was conducted in October 2023.

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