

Modern Slavery Statement

Financial year end 31 December 2024

Introduction

This statement is made pursuant to the UK Modern Slavery Act 2015 (the “Act”) on behalf of Canadian Solar UK Limited, Canadian Solar EMEA GmbH and Canadian Solar SSES (UK) Ltd (“Canadian Solar” or “We”). These entities are doing business in the UK and are subsidiaries of CSI Solar Co., Limited, part of the wider Canadian Solar group.

This statement is also made on a voluntary basis on behalf of (i) Canadian Solar UK Limited’s subsidiaries who are not doing business in the UK but who are involved in international sales of solar photovoltaic (PV) modules and related PV products and (ii) Canadian Solar SSES (UK) Limited’s group companies who are not doing business in the UK but who are involved in international sales of battery energy storage solutions (under the Canadian Solar “e-STORAGE” brand).

Canadian Solar is committed to acting ethically and with integrity in all our business relationships and will continue to implement and enforce effective systems and controls to prevent modern slavery in any part of our business and supply chains. This includes closely examining our supply chains to ensure goods imported are not mined, produced or manufactured using prohibited forms of labour, such as slave, convict, indentured, forced or indentured child labour.

This statement details the recent actions taken by Canadian Solar to strengthen our policies and performance towards ensuring that modern slavery is not present in our business and supply chains and to minimize any potential risks. It outlines our continued efforts to broaden the scope of our policies, to detect the risk of modern slavery and to ensure that we have in place the best responses to those risks and a strategy to eliminate them should the need arise. This statement has been prepared pursuant to the reporting criteria of the Act and covers the period 1 January 2024 to 31 December 2024.

Our commitment

Canadian Solar is committed to corporate social responsibility, including ensuring ethical labour practices and the prevention of modern slavery in our business and supply chains. Canadian Solar has a vision to foster sustainable development and make lives better by bringing reliable renewable power and energy storage to people

worldwide. To underpin this commitment, we are an active participant in the United Nations Global Compact (UNGC) and have pledged to support and adhere to the Ten Principles of the UNGC on human rights, labour, environment and anticorruption.

This vision drives Canadian Solar's values which underpin how Canadian Solar does business with counterparties and how we treat our workers and the communities where we operate.

Canadian Solar believes in being transparent and in always doing the right thing. This informs our approach to managing the risk of modern slavery. This simple yet powerful approach is at the centre of our business philosophy and drives how we execute our strategy to empower communities and their energy future. We are committed to building on this foundation. We will continue to refine our tools to address modern slavery risks as we work to create a sustainable world.

Canadian Solar is well-positioned to comply with new and forthcoming legislative developments at national level in the countries where we operate and at the EU level, including the Regulation Prohibiting Products made with Forced Labour on the EU Market, the Directive on Corporate Sustainability Due Diligence (and the related Omnibus package) and the Batteries and Waste Batteries Regulation¹. We are actively monitoring and preparing for forthcoming developments to ensure that we are compliant and can demonstrate our compliance to our customers and other stakeholders.

Our structure, business and supply chains

Canadian Solar carries on business in the Europe, Middle East and Africa region ("EMEA"), including in the UK. Our regional hub for PV modules sales is based in Munich, Germany and our regional hub for storage solutions is based in London, UK, through the e-STORAGE business. It is part of the broader Canadian Solar group under the ultimate parent company, Canadian Solar Inc. which is headquartered in Ontario, Canada and has been publicly traded on the NASDAQ as CSIQ since 2006. The Canadian Solar group has over 17,000 employees globally and has subsidiaries in 23 countries and regions on 6 continents. In financial year 2024, the group shipped globally 31.1 gigawatts of modules and 6.6 gigawatt-hours of battery energy storage systems, delivering an annual revenue of circa. USD 5.993 billion.

¹ Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC

Canadian Solar's business is comprised of primarily the sale of PV modules, battery energy storage systems, inverters and other solar and energy storage products manufactured by Canadian Solar group companies. This business segment is referred to as the CSI Solar segment within the wider group. The parent company for the companies in the CSI Solar segment is CSI Solar, Co., Ltd.

The CSI Solar business segment accounts for the majority of the group's net revenue (more than 95% in 2024).

Canadian Solar's manufacturing facilities are located in the following countries:

- Canada: Ontario
- United States: Texas, Indiana and Kentucky
- Thailand: Chonburi province
- China: Jiangsu, Henan, Inner Mongolia, Qinghai and Zhejiang provinces
- Vietnam: Haiphong province

Further information, including the names and locations of our group manufacturing subsidiaries, is set out in the Canadian Solar Inc. Annual Report. The group sells battery energy storage and PV products to customers, across the residential, commercial and utility segments. in over 160 countries.

The goal of our strategy is to establish resilient, sustainable, efficient and ethical supply chains that meet the development needs of our group and the interests of all our stakeholders, among whom we count those workers involved at all stages in the manufacturing process as key.

In addition to the supply chains detailed below, we also procure related services in connection with the supply and delivery of Canadian Solar PV and battery energy storage system products, such as transport, logistics, maintenance services and corporate services.

PV module manufacturing and supply chains

In relation to manufacturing of PV modules, our key supply chains relate to the procurement of cells, wafers, ingots and polysilicon. The Canadian Solar group manufactures modules, cells, wafers and ingots and also purchases cells, wafers, ingots and polysilicon from third parties.

In relation to polysilicon, where this is purchased directly by the Canadian Solar group, it is purchased from suppliers incorporated in Germany, Malaysia, and various provinces in China. At the EMEA level, Canadian Solar is providing customers with

increased transparency of our silica supply chain, together with related third-party audit rights.

Going forward, the group is pursuing a dual strategy to diversify its external suppliers and also to build its in-house manufacturing capabilities. All external manufacturing suppliers are subject to our ESG due diligence programme, further detailed below.

At group level, in addition to the polysilicon supply chain referred to above, we also have external manufacturing supply chains in relation to other raw materials and components, including glass, steel, silver and packaging materials and related services.

Battery energy storage system manufacturing and supply chains

In relation to the manufacturing of battery energy storage systems, our key supply chains relate to the procurement of lithium iron phosphate (LFP) battery cells, thermal management systems, battery management systems, enclosures and racking. The Canadian Solar group manufactures battery packs and containerized battery energy storage solutions. Operating through our e-STORAGE brand, we also procure and sell inverters, medium voltage transformers and energy management systems in order to deliver complete end-to-end, utility-scale, turnkey battery energy storage system solutions across various applications.

In relation to lithium contained in the battery cells procured by the Canadian Solar, we are receiving requests from customers for visibility into the lithium supply chain, together with related third-party reporting and verification. Building on the group's experience in other regions, including the U.S., significant progress has been made in this regard.

Our policies

Canadian Solar has the following policies and procedures in place in relation to slavery and human trafficking:

- Canadian Solar's Modern Slavery Policy and associated procedures (<http://investors.canadiansolar.com/static-files/9933a290-df48-45ef-9738-c31154bf96d8>). This Policy describes modern slavery as a "crime", commits "to complying with anti-slavery laws and regulations in every jurisdiction in which it conducts business" and "ensuring that modern slavery does not take place anywhere in its business, including through its supply chain" and clearly

states that “Canadian Solar will not tolerate any parties directly or indirectly engaging in modern slavery”.

- Canadian Solar’s Supplier Code of Conduct, which is required to be signed and adhered to by all group suppliers (<https://investors.canadiansolar.com/static-files/ae1534e7-8b4a-4dce-833d-b7a12c5041bb>). This Code transcends the basic requirement of prohibiting modern slavery, extending to broader issues such as human rights, environmental protection, health, safety, and business ethics. Our Code, primarily derived from the Responsible Business Alliance (RBA) Code of Conduct, serves as an integral part of our due diligence process for assessing new suppliers, who are required to adhere to it. Furthermore, we require our suppliers to ensure that their own suppliers to operate in compliance with the Code. In this way, we ensure that not only our direct suppliers but also our indirect suppliers - that is, our suppliers' suppliers - uphold the obligations set forth in the Code.
- We incorporate modern slavery clauses and covenants in our supply contracts, requiring suppliers to comply with applicable modern slavery laws, implement appropriate controls and notify Canadian Solar immediately if they become aware of any modern slavery actions within their supply chains.

In addition, we have the following established group-wide policies and procedures in place which underpin our core values in this area:

- Code of Conduct and Ethics (<https://investors.canadiansolar.com/static-files/88af24b8-0eea-4291-b984-d1b401be2ca2>)
- Anti-Bribery and Anti-Corruption Policy (<https://investors.canadiansolar.com/static-files/a9f5e39a-d849-47cd-99c5-35bbff07fc11>)
- Whistleblower Policy (<http://investors.canadiansolar.com/static-files/6c23cd29-a9d7-4946-a657-6791b69b93c0>)
- Conflict Minerals Policy (<https://investors.canadiansolar.com/static-files/32eba6e4-b40d-4b4c-be76-c979ab487b75>)
- Labor and Human Rights Policy (<https://investors.canadiansolar.com/static-files/20aa7ed9-5f17-4362-89e6-7d46a4d72387>)

Due diligence processes in relation to our business and supply chains

- **Anti-modern slavery efforts in our own operations**

All our global manufacturing entities are required to sign “Statement of Anti-Modern Slavery Risk Management” on an annual basis. As part of this process, our manufacturing group HR directors or managers are required to confirm that their respective manufacturing entities comply with all applicable laws and regulations and company policies related to forced labour. They must explicitly affirm that their respective factories are not involved in any activities associated with forced labour. The statement was developed based on the key internationally recognized principles and guidance in this respect, including the Ten Principles of the UN Global Compact (UNGC) and the International Labor Office Indicators of Forced Labor from which UNGC Principles are in part derived. Furthermore, we administer mandatory training on anti-modern slavery (see below).

- **Modern slavery risk assessment and contractual assurance from suppliers**

We extend our anti-modern slavery initiatives to encompass our supply chain. Prior to engaging with new manufacturing suppliers, our central procurement division conducts a modern slavery risk assessment. We also require our suppliers to provide contractual assurances, verifying that they are not involved in any form of modern slavery, which requires them to investigate their supply chain to ensure their suppliers do not engage in modern slavery.

- **Supplier ESG audits**

We have implemented a rigorous ESG auditing program to ensure that our suppliers comply with our ESG standards and to effectively manage ESG risks across our supply chain. This program covers areas such as human rights, environmental impact, quality, health and safety, and business ethics, aligning with our Code. It involves both on-site and desk-based audits. Non-compliant suppliers risk severing their business relationship with our company, particularly if they fail to adequately address our warnings. To support our suppliers, we provide compliance training on the Code and consultations to enhance their practices in line with our ESG priorities.

Each year, we conduct a thorough mapping of supplier base to identify our critical suppliers, considering our purchase expenditures and the potential ESG risks associated with their industry, size and operations. These critical suppliers are further categorized into different groups based on their risk level and are subject to onsite or desk audits. Additionally, our supplier auditing program extends to a subset of our non-critical suppliers, ensuring a comprehensive approach to managing ESG risks across our supply chain.

Our auditing program requires suppliers to respond to our questionnaires and provide supporting documentation. Responses are assessed using a system of "veto" and "scored" criteria. Any negative response in the veto criteria, such as the potential presence of forced or child labour, results in the immediate disqualification of the supplier. Suppliers must attain a minimum score of 60 to pass our audits. Those who fall short of this requirement receive warnings and are offered consultation to help address the identified issues. Continued failure to meet our required standards within a specified period of 1 to 6 months post-consultation leads to disqualification.

In 2024, we completed 147 supplier ESG audits, including 31 on-site audits, compared to 129 total audits and 29 on-site audits in 2023. No instances of forced or child labour were detected in our 2024 audits. After consultation and implementing corrective action plans, all our suppliers passed our ESG audits.

Parts of our business and supply chains where there is a risk of modern slavery and the steps taken to assess and manage that risk

We recognise that there may be specific risks of modern slavery arising through certain supply chains and we commit to take pro-active steps to prevent such risks from materialising, and, in the event any such risks are identified, to take preventative or remedial action. Given the complexity, opaqueness and geographical location of these supply chains, we may face challenges in assessing the extent of this very serious risk.

Component products and materials which are identified as having originated in Asia and outside our group are considered to pose an elevated potential risk of modern slavery within our supply chains. To combat this risk, we continue to work with our direct and indirect suppliers who are procuring component products in Asia towards improved visibility, review and audit of our indirect suppliers, including the contractual right for us to conduct audits at our supplier's premises. During the course of 2024, we have achieved a marked increase in the number of manufacturing suppliers who are granting comprehensive audit rights, both as part of our own auditing programme and also those of our customers, including in relation to silica components. Our focus continues to be on achieving transparency at all levels for 2024 and beyond.

Canadian Solar is committed to ensuring that modern slavery does not take place anywhere in its business, including through its supply chains anywhere in the world. In furtherance of this, we continue to prioritise the development of our processes to scrutinise our supply chains in relation to this critical issue, alongside our push towards

vertical integration, which gives us more oversight over our whole supply chain and our increased supply chain diversification.

To that end, Canadian Solar maintains robust information systems to manage its supply chain data, including mapping and risk impact assessments, with partnerships including:

- *OCR Continuous Screening Database*

OCR's Watch List Screening and Denied Party Screening provides Canadian Solar with the ability to check all suppliers against government and non-government most current restricted, denied, or prohibited party lists to ensure no business transactions occur with an entity that is prohibited by law. Watch List Screening provides a complete audit trail to demonstrate that due diligence was performed properly.

- *Kharon*

Kharon's risk data and software provides precise and powerful compliance, risk management, investigatory, and analytic capabilities. Kharon Clear View is a web-based application allowing users to search for entities or individuals of interest and quickly understand associations with global security topics, including sanctioned or trade-restricted parties. Kharon is now the preferred software by U.S. Customs & Border Protection for supply chain monitoring after signing a long-term partnership in October 2023.

Our effectiveness

Canadian Solar acknowledges that it will continue to face modern slavery risks and its strategies to mitigate these risks will continue and evolve over time.

In order to assess the effectiveness of its measures, we engaged the Responsible Business Alliance (RBA) to conduct a Validated Assessment Program (VAP). This programme is the leading standard for onsite compliance verification conducted by RBA-accredited independent, third-party firms. This on-site audit includes the areas of labour practices (including ensuring there is no forced labour).

An RBA VAP audit was conducted at Canadian Solar's factory in Thailand in 2023 by TÜV Rheinland where we achieved Silver-level recognition. In 2024, we conducted a further RBA VAP audit at our solar cell factory in Suqian, Jiangsu Province, China, which also received Silver-level recognition. Both audits confirmed Canadian Solar's full compliance with "Freely Chosen Employment" standard, in other words, no presence of forced labour. In parallel, two of our polysilicon ingot suppliers in Qinghai Province initiated RBA VAP audits at our request. These supplier audits are expected to be completed in the second half of 2025.

As part of evaluating and demonstrating our effectiveness in this area, we also participated in a number of international ESG related initiatives:

- Canadian Solar is a member of the Solar Stewardship Initiative (SSI), a European initiative set up by SolarPower Europe and Solar Energy UK. The SSI's mission is to work collaboratively with manufacturers, developers, installers and purchasers across the global solar value chain to foster responsible production, sourcing and stewardship of materials. As part of this initiative, Canadian Solar is committed to the SSI Standards, which deliver a supply chain sustainability solution tailored to the solar industry and are used by independent assessors to evaluate compliance with robust sustainability and ESG criteria. During the course of 2024, Canadian Solar has worked closely with the SSI to complete the SSI certification process for its Ingot and Cell factory in China, finally obtaining SSI ESG certifications for PV-Cell and PV-Ingot Production facilities.
- We received a Prime ESG rating from Institutional Shareholder Services (ISS), placing us among the top 5 percentile of the nearly 100 globally rated companies in our industry.
- We have completed a detailed assessment programme with EcoVadis, one of the world's largest and most trusted providers of business sustainability ratings. In 2024, following this assessment, Canadian Solar has been awarded again a Silver rating, placing the company in the top 4% of companies within our industry, and the top 9% of all assessed companies. The assessment covered four core areas: environmental impact, labour and human rights, ethics and sustainable procurement. Canadian Solar ranked in the top 2% for environmental practices and top 3% for labour and human rights. .
- We also maintained an Excellent ESG rating from Achilles, a distinguished UK agency evaluating environmental, social and governance factors across supply chains.

- In October 2024, Canadian Solar was ranked No. 1 in Newsweek's "World's Most Trustworthy Companies 2024" in the Energy & Utilities sector.²

In addition to the above, many of our group factories have successfully completed and passed external third-party ESG audits requested and commissioned by our customers. These audits involved a detailed review of our labour practices and employee working conditions and were conducted by leading independent international audit firms such as Achilles, STS and Kiwa.

Training

Training and awareness are key controls in addressing the risk of modern slavery. Canadian Solar is committed to continue building the capability of our employees at all levels (particularly our procurement practitioners and front-line staff) to identify potential red flags of modern slavery and the actions required to respond appropriately.

Towards this aim, we implement a global, mandatory training programme for all our employees, including senior management, and for all new employees as part of their mandatory onboarding compliance training.

The core of this modern slavery training is an interactive training programme addressing:

- the types of behaviours which constitute modern slavery;
- the challenges Canadian Solar faces;
- what we are doing to address the risks;
- what all employees should do to identify and tackle modern slavery in their day-to-day roles.

All attendances are monitored and recorded.

In addition to this training programme, we have also worked with our customers and their external ESG advisors in developing and delivering human rights training to the relevant Canadian Solar business areas and our customers.

Approval

² See Newsweek, "World's Most Trustworthy Companies 2024," (October 2024) available at [Energy & Utilities - Newsweek Rankings](https://www.newsweek.com/worlds-most-trustworthy-companies-2024-1698444) (newsweek.com).



This statement is made pursuant to section 54 (1) of the UK Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2024. It was approved by the boards of directors of Canadian Solar UK Limited, Canadian Solar EMEA GmbH and Canadian Solar SSES (UK) Limited and has been signed by the undersigned directors on behalf of these entities.

[Signature page follows]



Date:

Signature: _____

Name: Yan Zhuang

Director, Canadian Solar UK Limited

Date: 10/07/2025

Signature: _____

Name: Thomas Koerner

General Manager, Canadian Solar EMEA GmbH

Date: Oct-13-2025

Signature: _____
Signed by:

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Name: Colin Parkin

Director, Canadian Solar SSES (UK) Limited

Date: 10/09/2025

Signature: 
[Yan Zhuang \(Oct 9, 2025 20:58:56 GMT+8\)](#)

Name: Yan Zhuang

Director, Canadian Solar UK Limited

Date: 10/07/2025

Signature: 

Name: Thomas Koerner

General Manager, Canadian Solar EMEA GmbH

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Signature: _____

Name:

Director, Canadian Solar SSES (UK) Limited