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Workplace Violence and Anti-Harassment Policy

I. Purpose

e-Storage is committed to maintaining a work environment free from all forms of violence, harassment, and sexual harassment. Violence or harassment of any kind is unacceptable and will not be tolerated. Such conduct is strictly prohibited under the Company's Code of Business Conduct and Ethics.

The purpose of this Policy is to prevent incidents of workplace violence and/or harassment and to implement appropriate preventive, corrective, and punitive measures to protect the rights, privacy, and physical safety of all individuals.

II. Scope

This Policy applies to all employees, independent contractors, and visitors at e-Storage, its subsidiaries, facilities, and workplaces operated or controlled by the Company. This includes conduct at the physical workplace, during work-related travel, and at work-related social functions.

III. Definitions

a. Workplace Violence

For the purposes of this policy, "violence" means any of the following: Threats, including a threatening statement or threatening behaviour that gives an employee reasonable cause to believe that the employee is at risk of physical injury. As well as, conduct or attempted conduct of a person that endangers the physical health or physical safety of an employee.


b. Harassment includes all inappropriate conduct that creates a disrespectful, intimidating, hostile, degrading, humiliating, or offensive environment. It may involve verbal or physical conduct, including comments, actions, or gestures, that affect a person's dignity or psychological/physical integrity.

Examples:

Defamatory language; offensive jokes; display of racially sensitive items; spreading harmful rumors; bullying, teasing, or ridiculing colleagues; posting offensive content via email or instant messaging (Teams, WeChat, etc.).

c. Sexual Harassment

Harassment specifically based on sex, including any unwelcome sexual advance, unsolicited

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sexual attention, demand for sexual access or favors, or verbal/physical conduct of a sexual nature. It can occur between individuals of the same or different genders.

Examples:

Inappropriate touching (pinching, slapping); unwanted invitations proposing sexual relations; sending sexually suggestive messages; leering or whistling; making comments about appearance/body parts; inquiring about an individual's sexual experiences.

IV. Responsibilities

a. Management

- Lead by example to maintain a violence and harassment-free environment.
- Ensure all employees are aware of this Policy and their rights.
- Immediately report any instances of harassment or violence to the HR Department.
- Take appropriate action to address violations, which may include disciplinary action.

b. Human Resources (HR)

- Receive and handle employee reports regarding harassment and violence.
- Conduct or oversee impartial investigations.
- Implement preventive, corrective, and punitive measures while protecting the privacy of victims.


c. Employees

- Treat all individuals with dignity and respect.
- Refrain from engaging in any form of violence or harassment.
- Promptly report any incidents experienced or witnessed.
- Cooperate fully and truthfully in any investigation or resolution process.

V. Reporting Procedure

To maintain a safe work environment, e-Storage encourages employees to speak up immediately if they witness harassing or violent behavior. There are several options for reporting:

1. **Direct Supervisor:** Report the incident directly if comfortable.
2. **HR Department:** Contact anyone in the HR Team directly via email.
3. **Whistleblower Hotline:** Global: +1 519 823 7451.
4. **Anonymous Reporting:** Email whistle-blower@csisolar.com.

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Note: In the event of an emergency where immediate physical safety is at risk (e.g., an active threat of violence), employees should contact emergency services (911) immediately.

VI. Investigation and Resolution

a. Investigation Process

Once a report is received, an investigation will commence within three (3) business days. An impartial three-person investigation team will be assembled to conduct a prompt, fair, and thorough review.

- The investigation will be completed within one month (30 days). Extensions may be granted if necessary but shall not exceed an additional 30 days and must be communicated in writing.
- The process will involve interviewing the complainant, the respondent (alleged harasser), and relevant witnesses.

b. Confidentiality & Non-Retaliation

All records of reports and investigations will be kept strictly confidential to the extent possible. e-Storage prohibits retaliation against any employee who reports an incident or participates in an investigation. Retaliation is treated as a separate violation of Company policy.


c. Follow-Up & Discipline

If the investigation confirms a violation:

- Corrective action will be taken immediately to address the behavior and prevent recurrence.
- Disciplinary action may be taken against the harasser, up to and including termination of employment.
- Management will communicate to the reporting employee that appropriate action has been taken.

VII. Compliance & Internal Audit

- Facilitate anonymous reporting channels and track incidents for compliance.
- Audit the effectiveness of controls and documentation related to harassment prevention.

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VIII. Training

Mandatory anti-harassment and violence prevention training will be provided to all employees, supervisors, and managers at least once every two years. New employees will receive this training during onboarding.