

Heliene Inc.

Modern Slavery Statement

2023

ABOUT OUR COMPANY

Heliene Inc. (“Heliene”) is a fast-paced entrepreneurial company growing rapidly in the highly desirable solar energy industry, with a mission to be part of the solution to climate challenges and contribute to a better planet. Heliene has taken the challenge to help the world reduce its reliance on fossil fuels, by striving to be a leader in renewable energy.

Heliene manufactures high efficiency and high-quality solar modules. Our modules are produced on state-of-the-art solar manufacturing lines. Heliene headquarters are located at 488 Allen’s Side Road, Sault Ste. Marie, Ontario, Canada, P6C 2L8. Heliene USA operations are located at 8787 Silicon Way, Mountain Iron, MN 55768 and conducted under Heliene USA Inc.

Heliene is a Canadian held private company founded in 2009 in Sault Ste Marie, Ontario which ambitiously targeted to be a leader in solar module manufacturing by providing a superior quality product and exceptional customer experience that would separate Heliene from many of its competitors.

Since starting its initial module manufacturing line in Sault Ste Marie in 2010 with an annual capacity of 35MW of Canadian made solar modules, Heliene has since expanded through organic growth to 1.0GW of module production in North America. This growth comes with the latest expansion in the State of Minnesota servicing the US market with domestic production of state-of-the-art solar modules of world class quality.

In response to the demand, Heliene has certified a network of business partners worldwide manufacturing Heliene designed modules under the Heliene name. This network is also capable to supply an additional 1GW of products. Heliene has grown to service many jurisdictions and has since 2015 become a bankable module of choice for customers and is on a short list of Tier 1 module manufacturers worldwide.

Heliene continues to expand to service various markets in the North American photovoltaic supply chain. Heliene has personnel and locations stationed across North America including Sault Ste Marie, Toronto, Mountain Iron, Minneapolis, California, Wisconsin, and many others. Heliene has leveraged the expertise of people across the globe for engineering, technological development and provides employment opportunities to experts in all fields including Finance, Supply Chain, Logistics, Engineering, Technology, Manufacturing, Project Management, Electrical and Mechanical disciplines as well as many operational roles.

Heliene understands that modern slavery can take many forms but fundamentally is a range of exploitive practices including human trafficking, forced labour, servitude, deceptive recruiting, and child labour. Heliene does not tolerate modern slavery, forced labour nor human trafficking whatsoever. Heliene is committed to high ethical standards in all aspects of its business, and endeavors to work with suppliers that follow these same high standards.

Heliene is also committed to mitigating the risk of modern slavery occurring within its own business, in its supply chains and through other business relationships. Heliene will not knowingly engage with any consultants, suppliers or contractors that engage in modern slavery and is proactively taking steps to detect and eliminate risks.

OUR COMMITMENT

Heliene is committed to having a robust framework and processes in place to minimise the risk of modern slavery in our business operations and our supply chains.

Heliene is also committed to prevent, remove, and resolve any act of modern slavery within its own network and ultimately throughout the industry as a whole. Heliene is now a recognized force to promote North American made content within its supply chain to further limit the risks associated to countries with less enviable modern slavery track record.

From engaging with those suppliers who practice high standards of business ethics to improving transparency and traceability of its supply chain, Heliene is striving to become a leading example in protecting labour rights.

As part of this responsibility, Heliene is committed to improving its understanding and mitigation of the risks of modern slavery occurring within our operations and supply chain. Heliene has progressed several initiatives to meet these objectives.

As stated in the pledge, Heliene “is committed to helping ensure that the solar supply chain is free of forced labour and raising awareness within the industry on this important issue. To assist in these efforts, Heliene supports the development of an industry-led solar supply chain traceability protocol as a tool for identifying the source of primary raw materials and inputs and tracking their incorporation into finished products, including solar modules.” Heliene will continue to advance its processes, apply a rigorous modern slavery risk management methodology and delve more deeply into the practices of our high-risk suppliers and operating locations. With the support of external parties, Heliene has integrated various private and public data bases and web sites capable of identifying risks of forced labour in its supply chain.

This is Heliene’s first modern slavery statement under Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act or Canadian Modern Slavery Act) and this statement sets out the actions Heliene has taken to assess and address modern slavery risks in our operations and supply chains.

Heliene intends to grow its forced labour risk management framework and measure the effectiveness of its key mechanisms to mitigate and eliminate the modern slavery in its overall business operations and supply chains.

OPERATIONS AND SUPPLY CHAINS

Heliene is one of the largest North American and most recognised photovoltaic manufacturers for its high-quality, high-efficiency solar modules. Heliene’s main business function in Canada, USA and through a global network of business partners is to design, manufacture and distribute premium quality photovoltaic (“PV”) modules.

In 2023, Heliene manufacturing footprint consisted of one module production site in Sault Saint Marie, Ontario, Canada and two manufacturing lines in the USA located in Mountain Iron, Minnesota. Heliene expects expansion plan for a second USA site in 2024.

Heliene is reliant on a global and complex solar supply chain. Over the years, Heliene has established a flexible and adaptable supply chain to secure raw materials, components, state of the art manufacturing

equipment and modules. Heliene is currently deploying significant efforts to promote local suppliers to limit the footprint of its value chain while increasing transparency in the business processes. This trend will continue in the foreseeable future as Heliene seeks the recognition and benefits (environmental, financial, tax, flexibility, agility, transparency, etc.) associated with the effort.

Heliene will continue to rely on foreign sourcing for some key components until a complete globally competitive local supply network is established for raw material.

Heliene has an established Policy to combat forced labour and as a Supplier Code of Conduct, both documents available on its website to further inform the customers and suppliers about its position on this important topic. The documents set out clear expectations with respect to human rights.

The policy above is supported by documented processes for the management of complaints and grievances, and Heliene has a whistle-blower mechanism should employees or anyone else wish to report potential policy breaches confidentially. This policy and procedures are reviewed regularly.

Further, Heliene has implemented strict guidelines in evaluating current and potential suppliers that gauges each vendor’s competence across all attributes, including its socially responsible nature. The processes and practices that Heliene applies with respect to managing modern slavery risks in Heliene’s workforce form part of its overarching risk management program and are subject to the oversight of Heliene.

MODERN SLAVERY RISKS

Heliene is committed to identifying any possible modern slavery risks in its business operations and supply chains. Heliene acknowledges that it will address any modern slavery instances when they occur; and seek to prevent or mitigate any modern slavery instances that are linked (directly or indirectly) to its business operations even where it has not contributed to these any modern slavery instances itself.

Heliene acknowledges that the industry sector and certain aspects of its supply chains may have a higher risk of modern slavery. Heliene has considered the following factors in evaluating the risk of modern slavery in its operations and supply chains:

Risk Indicator	Description
Industry risks	As an organisation that operates in the manufacturing industry, Heliene understands that we are identified as a high-risk industry
Product and service risks	Heliene further understands that certain products used in our supply chains are identified as high-risk products
Entity risks	Heliene is not aware of any non-compliance with human rights or labour standards

ACTIONS TO BE TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Heliene is focused on building its understanding and capabilities, improving its policies and processes, and enhancing engagement with its suppliers and modules manufacturing partners. Heliene is committed to take the following actions during the next reporting period in order to assess and address modern slavery risks with its operations and supply chains.

Workstream	Actions to be taken to assess and address modern slavery risks
Accountability for modern slavery issues, with an identified risk owner	Heliene acknowledges its accountability for addressing modern slavery issues in its business operations and supplier contracts. A nominated resource is already in place within supply chain and contracts are addressing the issue. Heliene plans to re-enforce its effort by integrating the applicable processes within its global ESG initiative.
On-boarding and contracting	Heliene will continue to perform due diligence on all new suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate for our business. Master supply Agreement already addresses the issue.
Training	Heliene will ensure that all employees susceptible to make decision on modern slavery topics receive adequate training on its Policy to combat forced labour and any supporting processes applicable to their role. This will be done during new employee onboarding and as a refresher one time per year. It will be integrated to its HR training calendar.
Complaints mechanism	Heliene is committed to encouraging our employees to report suspected violations involving any form of forced labour and modern slavery through our Global Ethics Hotline. Our global grievance channel will provide our employees to report any forms of modern slavery risks identified in our operations or supply chains.

Heliene recognises that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and an evolving process that Heliene is committed to continue to build upon.

MEASURING EFFECTIVENESS

Heliene's risk management framework is consistent with the global risk management system. Heliene has established its companywide risk management strategy and built and operated a system with which it may not only prevent a risk in advance but also cope with it as soon as it happens through a comprehensive analysis and counterplan.

Heliene continues to evaluate and perform the following internal control systems and mechanisms to identify, assess and monitor emerging the modern slavery risks within our business partners and supply chains and eliminate these risks.

Internal Control System	Controls or action effectiveness
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SUPPLIER AUDITS	<p>Heliene has conducted supplier audits both on a global and local scale for those vendors that provide critical resources such as raw materials. A Qualification Audit is conducted at the initial approval stage prior to the supplier’s first transaction with Heliene. In addition, Heliene also hold frequently scheduled Surveillance Audits by third party like STS, PIB, CEA for approved vendors in addition to demand audits to find root cause of or verify corrective actions from customer claims and quality issues. These audits are based on extensive questionnaire of wide-ranging criteria which evaluates each supplier’s competency in the following areas: ▪ sourcing & purchasing▪ manufacturing control▪ warehouse management▪ calibration▪ traceability▪ human rights & working standards▪ ethical behaviour▪ anti-corruption▪ environmental protection▪ health & safety.</p>
SUPPLIER’S DILIGENCE	<p style="text-align: center;">DUE</p> <p>Heliene endeavours to serve the customers with solar products that meet global social compliance standards in all aspects, throughout every node of its supply chain. While Heliene is examining various avenues to make certain that these values are upheld, our partners are constantly encouraged to comply with ethical principles. We share our Code of Conduct with all direct suppliers as well as our licensed module makers via purchase orders. Our suppliers are required to sign and certify that they will abide by the Code of Conduct with contract termination on the line if they object to do so.</p>
MANAGEMENT SYSTEM	<p>Heliene has worked with the Suppliers to ensure they have a management system that is designed to ensure:</p> <ul style="list-style-type: none"> ▪ compliance with applicable laws, regulations and customer requirements related to operations and products; and ▪ conformance with our Code of Conduct; and ▪ identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. The management system contains corporate social and environmental responsibility policy statements affirming the commitment to compliance and continual improvement, endorsed by executive management.
TRACEABILITY COMPETENCE	<p>Heliene undertakes ongoing efforts to further enhance its supply chain transparency to ensure ethical component sourcing. From periodic self-evaluations to 3rd party audits, we are determined to fulfill its stakeholders’ demand to find a socially responsible, trustworthy entity in us. We implemented the Traceability Systems Maturity Assessment. We have been conducting self-assessments on a regular basis to inspect where the maturity of its traceability coordination reflects in comparison to that of the global standards. We also have implemented full traceability for sensitive material like PV cells. The traceability verification and audit extends from quartz mining through module manufacturing and delivery.</p>

SUPPLIER CODE OF CONDUCT

Heliene is committed to conducting business in an ethical and honest manner, and in a way that promotes corporate social and environmental responsibility. This includes responsible supplier selection by conducting business with suppliers who share the Heliene’s commitment to integrity. Heliene understands

that the business practices and actions of a supplier may impact or reflect upon the Heliene and its subsidiaries.

Therefore, Heliene operates, and require its suppliers, their employees, agents, and sub - suppliers (“Suppliers”) to operate in accordance with the principles and ethical standards contained in the Heliene Code of Conduct. Heliene has several module business partners. Heliene takes a proactive approach to monitoring anti-slavery measures within its module business partnerships. Through rigorous supplier evaluation processes and ongoing communication, Heliene ensures that its partners adhere to strict ethical standards, including the prevention of forced and child labour. Regular audits, site visits, and compliance checks are conducted to verify compliance with anti-slavery regulations and to address any issues promptly. Additionally, Heliene provides training and support to its partners to raise awareness and promote best practices in combating modern slavery. By fostering transparency, accountability, and collaboration, Heliene strives to create a supply chain that is free from exploitation and upholds the dignity and rights of all workers involved.

The purpose of our Supplier Code of Conduct is to define the basic sustainability requirements stipulated for all our Suppliers and module business partners. Our Supplier Code of Conduct is divided into four sections as human rights, labour standards, and business principles.

HUMAN RIGHTS

Heliene is fully committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. Heliene stands firmly behind the principles of international human rights, as enshrined in foundational documents such as the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. We are dedicated to fostering a workplace culture that champions inclusivity, diversity, and the protection of human dignity. We have hiring equity statements for all job postings. Our USA operations were granted the Workforce Certificate and Equal Pay Certificate and maintain an affirmative action program. Our Canadian employees are in majority from equity-deserving groups and speak more than one language.

Heliene is committed to addressing human rights challenges, extending beyond our immediate sphere to ensure that our supply chain and broader community uphold these universal values. A commitment to human rights is integral to ethical business conduct and indispensable for fostering a sustainable business.

Heliene requires all business in its supply chain to share the commitment to respecting, protecting, and promoting human rights. At a minimum, the expectation is:

- Safe and hygienic working conditions
- No use of child labour
- Payment of a living wage
- No excessive working hours
- No discrimination (i.e. race, colour, gender, sexual orientation, marital status, parental, status, religion etc.)
- No harsh or inhumane treatment

LABOUR STANDARDS

Heliene’s labour standards are as follows:

- Freely chosen employment
- Child labour avoidance and compliance with young worker safety
- Working hours
- Wages and benefits
- Humane treatment
- Non-discrimination

Involuntary, bonded (including debt bondage) or indentured labour or exploitative prison labour, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, coercion, abduction or fraud for labour or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities.

All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, such as government issued identification, passports, or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment.

Child labour is not to be used in any stage of manufacturing. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported.

Workers under the age of 18 shall not perform work that is likely to jeopardise their health or safety. Heliene works with its Suppliers/ OEM partners to ensure proper management of student workers through protection of students' rights in accordance with applicable law and regulations.

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local laws and regulations. Heliene is actively promoting a work life balance and environmental footprint reduction by authorizing remote work where possible.

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Heliene maintains competitive benchmark on total compensation and benefits, update compensation scale per employee class to ensure internal equity and overall strives to be recognize as an employer of choice.

Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, works shall be provided with a timely and understandable wage statement that includes sufficient information to verify its accuracy in compensation for the work performed. All use of temporary, dispatch and outsourced labour will be within the limits of the local law.

Heliene works with its Suppliers / OEM partners to ensure disciplinary policies and procedures shall be clearly defined and communicated to workers. There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, nor is there to be the threat of any such treatment. Disciplinary policies and procedures shall be clearly defined, documented, and communicated to workers.

Heliene is committed to a workforce free of harassment and unlawful discrimination. Heliene works with its Suppliers to ensure that no person will engage in discrimination based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy,

religion, political affiliation, union membership or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

HEALTH AND SAFETY

Heliene recognises that in addition to minimising the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. We also recognise that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

These health and safety standards are as follows:

- Occupational safety
- Emergency preparedness
- Occupational Injury and illness
- Industrial hygiene
- Machine safeguarding
- Sanitation, food, and housing
- Health and safety communication

Worker exposure to potential safety hazards (e.g., electrical, and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well maintained, personal protective equipment. Workers be encouraged to raise safety concerns and shall not be disciplined for raising safety concerns.

Emergency situations and events are to be identified and assessed, and their impact minimised by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation, procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans. Such plans shall include the focus of minimising harm to life, the environment and property.

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to:

- Encourage worker reporting
- Classify and record injury and illness cases
- Provide necessary medical treatment
- Investigate cases and implement corrective actions to eliminate their causes
- Facilitate return of workers to work.

Worker exposure to chemical, biological, and physical agents at dangerous levels is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

Production and other machinery should be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers. Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

Heliene works with its Suppliers / module manufacturing partners to ensure workers are provided with the appropriate workplace health and safety training in their language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire and physical hazards.

Health and safety information shall be clearly posted in the work facility or placed in a location identifiable and accessible by workers, in accordance with applicable law. Workers shall be encouraged to raise safety concerns and not fear or experience any retaliation or reprisal for so doing.

Ethics

To meet social responsibilities and to achieve success in the marketplace, Heliene works with its Suppliers / module manufacturing partners to uphold the highest standards of ethics including the principles outlined below.

- Business integrity
- No improper advantage
- Disclosure of information
- Intellectual property
- Fair business, advertising, and competition
- Protection of Identity and non-retaliation
- Responsible sourcing of minerals
- Privacy

The highest standards of integrity are to be expected in all business interactions. Heliene has a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, and embezzlement. All business dealings should be transparently performed and accurately reflected in our records. Monitoring and enforcement procedures shall be implemented to ensure conformance with anticorruption laws.

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorised, given, or accepted. This prohibition covers promising, offering, authorising, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

Information regarding labour, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer and supplier information is to be safeguarded.

Standards of fair business, advertising and competition are to be upheld.

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Heliene should have a communicated process for their personnel and workers to be able to raise any concerns without fear of retaliation or reprisal.

Heliene is committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees.

Heliene works with its Suppliers / module manufacturing partners to comply with all applicable laws and regulations in all locations where suppliers conduct business.

In addition to complying with all applicable laws and regulatory requirements, suppliers are expected to act in accordance with high standard of business ethics. Suppliers agree to safeguard the confidentiality of confidential information concerning our business partners and customers, to issue accurate and relevant financial and other information on our business operations, and to compete fairly and ethically in all other aspects.

The highest standards of integrity are expected from our suppliers, including their subcontractor and other entities acting on behalf of the supplier in all business interactions. All forms of extortion, bribery, and corruption, including improper offers of payment to or from employees or organisations, are prohibited.

Heliene encourages its suppliers and module manufacturing partners to establish and maintain policies and procedures designed to prevent forced labour and child labour.

Attestation:

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. I have the authority to bind Heliene Inc.

SIGNATURE OF ACCOUNTABLE MEMBER

DocuSigned by:

Martin Pochtaruk

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Martin Pochtaruk
President and CEO
Heliene Inc.

Signature date: May 24th, 2024.