



# Annual Report for Canada's New Anti-Forced Labour Supply Chain Law

CY2024

## LONGi Structure, Activities and Supply Chains

LONGi Solar Technology (U.S.) Inc. (LONGi-US) is a wholly-owned subsidiary of LONGi Green Energy Technology Co., Ltd. (LONGi-Group) (Collectively "LONGi") a leading global solar energy company operating with the mission to use solar energy to create a green world. Founded in 2000, LONGi-Group is headquartered in Xi'an, China, LONGi-Group is a pioneer in the solar industry, specializing in mono-crystalline silicon wafers, cells, and modules. LONGi-Group is one of the world's largest solar technology companies, ranking first in global module shipments since 2020. The company is renowned for its innovation-focused approach and commitment to sustainability. Prior to the publication of this report, LONGi-Group has broken the photovoltaic cell conversion efficiency record 20 times in a row since 2021.

LONGi-US exclusively imports solar products produced by the LONGi-Group and conducts numerous North American operations for LONGi-Group, including: sales, marketing, and customer support of LONGi-Group's solar products in North America. LONGi-US plays a crucial role in adapting LONGi-Group's strategies to the local market, ensuring compliance with regulations, and meeting the specific needs of North American customers. LONGi-US specifically engages in the following activities:

- **Sales and Distribution:** LONGi-US handles the logistics of importing LONGi-Group-produced solar cells and panels into North American markets, which include working with a network of distributors and after-sales services to ensure timely delivery and availability of products.
- **Marketing and Customer Outreach:** LONGi-US conducts marketing campaigns to promote its products in North America. This includes attending trade shows, participating in industry conferences, and engaging in digital marketing efforts to increase brand awareness and educate potential customers about the benefits of their high-efficiency solar solutions.
- **Technical Support and Service:** LONGi-US provides technical support to North American customers, offering assistance with product installation, maintenance, and troubleshooting to enabling customers to use LONGi-Group's products effectively and to maximize energy output.
- **Compliance and Certifications:** LONGi-US ensures that all LONGi-Group products meet local standards and regulations across North America. This includes obtaining necessary certifications from regulatory bodies, demonstrating compliance with relevant supply chain laws and adhering to industry standards for safety and performance.
- **Research and Development Collaboration:** Although most R&D is conducted by the LONGi-Group, LONGi-US may collaborate with local research institutions or participate in pilot projects to tailor LONGi-Group's technologies to the specific conditions and requirements of the North American market.



- **Partnerships and Alliances:** LONGi-US forms strategic partnerships with local businesses, utilities, and government entities to expand its market presence and influence in the renewable energy sector.

Through these focused operations, LONGi-US supports the overarching goals of LONGi-Group, while addressing the unique demands necessary to serve the growing demand for clean energy by providing high-quality solar modules to North America.

As one of the world's largest manufacturers of single-crystal silicon products, LONGi-Group has a vast global footprint that includes more than 37,000 employees and operations in over 30 locations and 30 manufacturing sites globally:

**LONGi-Group Corporate Operations:** LONGi-Group headquarters is located in Xi'an China. LONGi-Group's global operations span across more than 160 countries and regions, and we maintain corporate offices in: Shanghai, China; Madrid, Spain; Frankfurt Germany; Dubai, United Arab Emirates; New Delhi, India; Tokyo, Japan; Sydney, Australia; the United States (San Ramon, California, Pataskala, Ohio, and Dallas, Texas); St. Paul, Brazil.

- **LONGi-Group Production Operations in China:** LONGi-Group maintains 9 main production facilities in China: Yunnan, Inner Mongolia, Ningxia, Jiangsu, Shaanxi, Zhejiang, Anhui, Qinghai and Shanxi, with the Yunnan and Inner Mongolia facilities being the largest.
  - o **Yunnan Production Facilities:** The Yunnan production facilities consist of 7 main plants: [Baoshan], [Huaping], [Lijiang] and [Tengchong] mono-crystalline silicon ingot plants, the [Chuxiong], [Lufeng] wafer plants., as well as [Qujing] mono-crystalline silicon ingot & wafer plant.
  - o **Inner Mongolia Facilities:** The Inner Mongolia Facilities consist of 2 main plants: [Ordos LONGi Silicon] mono-crystalline silicon ingot & wafer plant, [LONGi Photovoltaic Technology (Ordos)] cell plant.
  - o **Ningxia Production Facilities:** Ningxia production facilities consist of 3 plants: [LONGi Photovoltaic Technology (Yinchuan)], [Yinchuan LONGi Silicon] mono-crystalline silicon ingot & wafer plant, [LONGi Photoelectric Technology (Ningxia)] cell plant.
  - o **Jiangsu Production Facilities:** The Jiangsu production facilities consist of 4 plants: [Wuxi hydrogen production equipment] plant, [LONGi Solar Technology (Taizhou)] cell plant, [LONGi Photovoltaic Technology (Taizhou)] and [LONGi Solar Technology (Jiangsu)] module plants.
  - o **Shaanxi Production Facilities:** The Shaanxi production facilities consist of 5 plants: [LONGi Green Energy Technology] wafer plant, [LONGi Solar Technology (Shaanxi)] cell plant, [LONGi Solar Technology (Xixian New Area)] wafer & cell plant, [LONGi Solar Technology (Xi'an)] cell & module plant, [LONGi Solar Technology (Xianyang)] module plant.



- **Zhejiang Production Facilities:** The Zhejiang production facilities consist of 4 plants: [LONGi Solar Technology (Jiaxing)], [LONGi Photovoltaic Technology (Jiaxing)], [LONGi Photoelectric Technology (Jiaxing)] and [LONGi Solar Technology (Zhejiang)] module plant.
  - **Anhui Production Facilities:** The Anhui production facilities consist of 2 plants: [LONGi Solar Technology (Chuzhou)] and [LONGi Photovoltaic Technology (Wuhu)] module plant.
  - **Shanxi Production Facility:** The [LONGi Photovoltaic Technology (Datong)] module plant is the main production facility in Shanxi Province.
  - **Qinghai Production Facility:** [LONGi Solar Technology (Qinghai)] is the module plant in Qinghai Province.
- **LONGi-Group Production Operations in Southeast Asia and North America:** LONGi-Group maintains 5 overseas production facilities in Kuching, Malaysia, Serendah, Malaysia, Vietnam and the United States.
- **Malaysia Production Facilities:** The [LONGi Malaysia] production facilities consist of 5 plants: Kuching ingot plant, Bingtulu ingot plant, Kuching wafer plant, Kuching Cell Plant and Serendah module plant.
  - **Vietnam Production Facilities:** The Vietnam production facilities consist of 3 entities: [Vina Cell] and [Nwestern Solar], both cell plants, and [Vina Solar], a module plant.
  - **The US Production Facility:** The Illuminate USA LLC (a joint venture company), a module plant, is the main production facility in the United States.

**LONGi-Group Global Production Totals:**

LONGi-US is a proud supplier to the Canadian market. In 2024, LONGi-US imported approximately 256.96 MW of modules into Canada. These modules were produced in various LONGi-Group facilities across Malaysia and Vietnam. To manufacture products that innovate and improve the technology of photovoltaic power generation, LONGi-Group must strategically cooperate with its network of suppliers across the global energy industry. LONGi-Group has built long-term strategic partnerships with suppliers located in Asia, North America, Europe, and Africa. These suppliers provide key raw materials and manufactured products that are integral to renewable energy. LONGi and its supplier’s technical leadership ensures innovative ideas, and technologies that: lower costs through technical innovations; expand application scenarios; and provide reliable and sustainable green energy to all mankind.

LONGi-Group is committed not only to promoting solar energy innovation but also to upholding business practices consistent with our social, environmental, and ethical responsibilities ([LONGi ESG Report](#)). As a prerequisite to a supplier partnership with LONGi-Group, we require suppliers to commit to complying with the following: all applicable laws and regulations in the countries/regions where they operate, and the LONGi [Supplier Code of Conduct](#), which encourages adoption of internationally recognized industrial



standards and best practices code of ethics, labour protection (including forced labour and child labour), occupational health and safety, environmental protection and social responsibility management system.

### **LONGi-Group Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour**

LONGi-Group is firmly opposed to the use of forced labour and child labour and is committed to the maintenance of due diligence policies and practices, as outlined in its [Due Diligence Report](#), to ensure that LONGi-Group supply chains are free of forced labour and child labour.

- LONGi-Group operations are governed by our [Code of Business Conduct](#), which includes express prohibitions against the use of forced labour and child labour in LONGi-Group facilities and the purchases of products or raw materials produced by forced labour or and child labour. We commit to vigorous efforts intended to ensure that neither material provided to us by a supplier nor the goods we produce will contribute to any form of forced labour or child labour.
- LONGi-Group mandates that all suppliers execute the [Supplier Code of Conduct](#), which codifies obligations relating to ethical practices, labour protection (including forced labour and child labour), occupational health and safety, environmental protection and social responsibility management system. As of 2024, 100% of LONGi-Group suppliers have executed the [Supplier Code of Conduct](#), formalizing their commitment to these standards under a legally binding contract, and any material violation of a supplier's duties under the code may trigger actions ranging from corrective measures to termination of LONGi-Group's partnership with the supplier.
- LONGi-Group's commitment to eradicating forced labour and child labour is enshrined in our [Human Rights Policy \(2024 edition\)](#), which prohibits all forms of forced labour (including debt bondage and involuntary overtime) and requires suppliers to execute a *human rights commitment letter*. The policy establishes a risk-based due diligence framework under which high-risk suppliers undergo annual third-party audits by independent firms. It also operationalizes a multilingual whistleblower hotline, with suppliers contractually obligated to implement comparable grievance mechanisms. These measures—covering supplier assessment, audit protocols, and compliance frameworks—align with international human rights standards to ensure ethical supply chain practices.
- LONGi-Group uses risk management software tools to screen potential suppliers before engaging in a new partnership. These tools derive information from a wide variety of data, including: global production and trade flows; research reports on forced labour, and/or child labour associated with the production of goods and the provision of services that may enter solar supply chains; and sector-specific information about countries where trafficking-related risks and cases have been reported.
- LONGi-Group also maintains supply chain traceability protocols, wherein LONGi-Group requires suppliers to submit key documents supporting the sourcing, production, and transportation of goods LONGi-Group's procured from the supplier. These documents include contracts, production records, transportation records and other similar documents. LONGi-US regularly audits these supplier documents corresponding to shipments imported across North America. These LONGi-US audits of key supply chain documents confirm supplier records at multiple levels of the LONGi-



Group supply chain. These audits ensure LONGi-US has full visibility into the entities, production locations, and labour standards used in the LONGi-Group supply chain. These audits include thousands of pages of records, and we do not provide advance notice to the suppliers, and during 2024 we conducted 182 of these supply chain documentation audits.

### **Risks of Forced Labour and Child Labour**

- LONGi-Group relies on information that is self-generated (e.g., supplier surveys), and information that is provided by governments, international bodies and other non-governmental organizations to enhance its identification of key areas for the risk of forced labour and child labour its supply chains. This information ensures that LONGi-Group can identify heightened areas of focus for assessing and managing risks with direct suppliers and indirect suppliers further upstream into LONGi-Group supply chains. The information that LONGi-Group relies on to assess and manage these risks include:
  - **Supply Chain Mapping:** LONGi-Group uses this tool to provide a systematic approach to understanding and visualizing the flow of goods and services from a supplier's initial acquisition of raw materials through production in LONGi-Group facilities to assess forced labour and child labour risks. LONGi-Group continuously monitors supply chain documentation to identify changes to mapping that might reveal increased risks of forced labour and child labour. Below, LONGi-US provides a step-by-step description of how supply chain mapping is typically conducted for this purpose:
    - **Identify and Document Supply Chain Tiers:** LONGi-Group identifies the suppliers. Tier 1 Suppliers - These are direct suppliers who provide finished goods or components directly to LONGi-Group. Tier 2 Suppliers -Suppliers to LONGi-Group's Tier 1 suppliers, providing raw materials or intermediate goods. Tier 3 and Beyond - Further upstream suppliers involved in the early stages of production, often including raw material extraction and processing.
    - **Gather Data and Information:** LONGi-Group collects detailed information about each supplier, including location, ownership, production processes, and labour practices.
    - **Production Processes:** LONGi-Group works closely with suppliers to understand the production processes at each tier to identify labour-intensive stages where forced labour and child labour may be more likely to occur.
- **Assessment of Geographic Risks:** LONGi-Group uses a variety of resources to assess the forced labour and child labour risk level in different countries. This effort is intended to identify countries where risks of forced labour or child labour have been reported by credible sources, including, but not limited to:
  - **U.S. Department of Labour's List of Goods Produced by Forced Labour or Child Labour:** provides a comprehensive list that identifies goods and their source countries that are at risk of being produced by forced labour or child labour.
  - **Global Slavery Index:** provides data on the prevalence of modern slavery, including forced labour, in different countries.



- **International Labour Organization:** provides country profiles with information on labour practices, including forced labour and child labour.
  - **United Nations Office on Drugs and Crime:** includes data on human trafficking, which often involves forced labour and child labour, providing country-specific information.
  - **Human Rights Watch:** publishes reports on human rights practices around the world, including issues related to forced labour and child labour.
  - **Transparency International:** identifies countries where corruption might exacerbate labour abuses, including forced labour and child labour.
  - **Various Non-Governmental Organizations and Research Institutions:** provides reports and resources on forced labour and child labour.
  - **Commercial Risk Assessment Firms:** offer commercial risk assessment tools and reports that can provide detailed insights into forced labour and child labour risks by country and sector.
- **On-Site Audits and Inspections:** Certain commercial activities, such as mining, may carry a risk of forced labour or child labour. Audits of suppliers, particularly in these areas, are conducted by LONGi-Group staff and/or third-party auditors to gain insights into working conditions and to identify potential forced labour or child labour risks.

LONGi-Group supply chain mapping for assessing and managing forced labour and child labour risks represent a comprehensive approach that requires detailed information gathering, risk assessment, and continuous monitoring across a variety of tools and mechanisms. LONGi-Group implements these robust risk mitigation strategies, to help prevent forced labour and child labour throughout its supply chains

#### **Any Measures Taken to Remediate Any Forced Labour or Child Labour, Including Loss of Income**

LONGi-Group monitors its suppliers' compliance with its [Supplier Code of Conduct](#) through random audits conducted by LONGi personnel and with independent third-party auditors. In 2024, we updated the supplier due diligence questionnaire by referring to the conventions of the International Labour Organization, international mainstream social responsibility management standards, and applicable laws and regulations. The updated questionnaire consists of seven parts, namely: Labor and Human Rights, Occupational Health and Safety, Environmental Protection, Business Ethics, Supply Chain Management, Supply Chain Traceability, and Social Responsibility Management System. We issued such questionnaires and conducted on-site audits on 123 new suppliers and 136 on existing suppliers. Of those new suppliers, 43 were deemed key new suppliers. We carried out 71 on-site audits for those 43 suppliers, which account for 73% of our bill of materials. In addition, we commissioned third-party ESG audits on suppliers of silicon materials and our internal ESG team also conducted audits of those suppliers (all internal ESG team auditors have obtained SA8000 internal auditor certification). The audits were based on the standards of SA8000 and relevant laws and regulations, covering five aspects including labour and human rights, business ethics, health and safety, environmental protection, and management system, with a total of 12 modules and 89 audit clauses. The third-party and internal ESG audits took place across multiple supplier facilities. The results of the on-site audit scores in 2024 are as follows: Class A (excellent) accounted for 31% of audits, Class B (good) accounted for 46%, Class C (average) accounted for 23%, and there were no Class D (failed) audit results. 100% of the silicon material suppliers passed the audit. There was no risk of child labour or forced labour found among the silicon material suppliers. All other non-conformities found during the audits were tracked to ensure that the



suppliers completed the closed-loop remediation on a regular basis in accordance with the management requirements.

### **Training Provided to Employees on Forced Labour And Child Labour**

LONGi-Group has various employee training courses that reflect its strict prohibition on the use of forced labour and child labour in its supply chains. These training courses serve to educate employees and supply chain partners on LONGi-Group's policies for forced labour and child labour; how to identify potential risks; and the procedures for reporting concerns.

- **LONGi-Group [Code of Business Conduct](#)**: establishes ethical standards and guidelines for the company's operations. It emphasizes the importance of integrity, compliance with laws, respect for human rights, and environmental responsibility. The code aims to ensure that all employees and stakeholders conduct business ethically, fostering a culture of transparency and accountability. The training, which is mandatory, is provided to all LONGi employees at the time of onboarding and is available year-round online.
- **SA8000 Standard Training**: includes child labour, forced or compulsory labour, health and safety, freedom of association and right to collective bargaining, discrimination, disciplinary practices, working hours, remuneration, and management systems. The training educates LONGi employees on socially responsible practices in areas such as worker rights and workplace conditions to ensure fair treatment of workers, compliance with labour laws, and implementation of ethical business practices throughout the supply chain and improving worker well-being. Training is mandatory and is provided to all LONGi employees at the time of onboarding.
- **ISO26000 Standard Training**: provides guidance on integrating social responsibility into LONGi's policies and practices, covering areas such as human rights, labour practices, the environment, fair operating practices, consumer issues, and community involvement. The training educates LONGi employees on socially responsible practices, focusing on worker rights and workplace conditions. It aims to ensure fair treatment, compliance with labour laws, and the implementation of ethical business practices throughout the supply chain. Training is mandatory and is provided to all LONGi employees at the time of onboarding.
- **Supplier Due Diligence Training**: provides guidance on identifying and mitigating risks of forced labour and child labour within the supply chain. The training aims to ensure compliance with the ethical standards identified in the LONGi [Supplier Code of Conduct](#). It also encourages companies to implement effective monitoring and corrective actions to prevent forced labour and child labour practices in their supply chains.
- **Social Responsibility Standard-Labour and Employment Training**: aims to enable employees to have a deeper understanding of CSR systems and requirements, mainly including general codes of conduct, interpretation of major regulations, requirements and related processes. This training is optional for staff.



- **Interpretation of Labour Contract Law and Prevention of Employment Risks Training:** provides guidance on understanding labour law and the risk of employment risk. This training is optional to all staff but mandatory to our Human Resource Center employees.
- **ESG Classroom:** Course on the United Nations Guiding Principles on Business & Human Rights Training focuses on the connection between business and human rights. The training aims to impart an understanding of relevant policies and measures, such as biodiversity protection and low-carbon management. In 2024, LONGi launched the "LONGi e - Learning Supplier Platform." Through systematic training and professional technical support, it continuously promotes the dissemination of the concept of sustainable development, helping suppliers improve their ESG management performance. During the reporting period, 228 suppliers have been encouraged to register and use the platform.

This list represents several of the LONGi-Group training courses maintained and offered to employees and suppliers. By implementing a structured and comprehensive training program, LONGi-Group intends to educate its employees and supply chain partners on preventing forced labour and child labour.

**How the Entity Assesses Its Effectiveness in Ensuring That Forced Labour And Child Labour Are Not Being Used In Its Business And Supply Chains.**

Protecting LONGi's supply chain from forced labour and child labour risks involve many actions deployed in concert, including training, due diligence, and verification. While no single measure should be taken to demonstrate success, we generally consider the following when assessing the overall effectiveness of our efforts:

- **Regular Audits and Inspections:** LONGi-Group conducts audits of suppliers to ensure compliance with forced labour and child labour prohibitions.
- **Due Diligence and Tracking Systems:** LONGi-Group uses software solutions to screen potential suppliers before engaging in a new partnership.
- **Supply Chain Traceability:** LONGi-Group regularly reviews supplier provided documentation to monitor for anomalies that might indicate a risk of forced labour or child labour.
- **Employee Training:** LONGi-Group provides ongoing training for employees on recognizing and reporting forced labour and child labour.
- **Supplier Training:** LONGi-Group offers training programs for suppliers to ensure they understand and comply LONGi-Group supplier obligations.
  - o **Non-Compliance Reported or Discovered:** LONGi-Group has established mechanisms that allow workers to report issues confidentially and without fear of retaliation.
- **Remediation of Risks/Incidents:** LONGi-Group monitors and analyzes data on reported incidents of forced labour or child labour to ensure development and implementation of remediation plans for any identified cases of forced labour or child labour, ensuring that affected workers receive appropriate support and compensation.
- **Supplier Contracts Terminated Due to Compliance Violations/Risks or Occurrence of Forced Labour or Child Labour:** LONGi-Group's Supplier Code of Conduct imparts a contractual obligation on our suppliers, and any material violation of a supplier's duties under the code may trigger

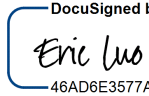


actions ranging from corrective measures to termination of LONGi-Group's partnership with the supplier.

By integrating these methods into a comprehensive assessment framework, LONGi-Group evaluates the success of its efforts to prevent forced labour and child labour within its supply chains.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, Xin Luo, Vice President of LONGi-Group, attest that I have reviewed the information contained in the report for the entity or entities listed above.

Based on the best of my knowledge and having exercised the degree of diligence required by law, I confirm that the information in the report is true, accurate and complete in all material respects for the purposes of complying with the Act, for the reporting year listed above.

DocuSigned by:  
  
/s/ \_\_\_\_\_  
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Full name: Xin Luo

Title: Vice President

Date: May 30, 2025