

# Envision Energy Modern Slavery & Human Trafficking Statement

## Introduction from the CEO

*"Simple compliance is more effective compliance.  
Effective compliance is a competitive advantage"*

Envision is committed to create a world of beautiful energy. At Envision, our mission is to solve the challenges for a sustainable future. The accomplishment of this mission relies on every Envisioner's devotion and innovation. At Envision, people are the most precious assets. To protect and to care for our people, we deem compliance risk management as one of our core competencies. We set up a working environment of integrity and trust. We advocate zero tolerance to breach of compliance rules. There are rules of thumb (also referred to as the Four Compliance Red Lines) within Envision, in which the following behaviors are strictly prohibited:

- Falsification or cheating;
- Breach of confidentiality;
- Abuse of authority for personal interests; and
- Dereliction of duty.

With the expansion and internationalization of Envision, to deal with emerging compliance challenges, the above values and basic principles, together with detailed rules, are compiled, forming this Code of Conduct (the '**Code**') to guide us through diverse scenarios of critical decision-making.

Envision is strongly committed to the preservation and protection of human rights and continuously seeks to improve our practices to combat slavery and human trafficking. As outlined in the Code, Envision is committed to ensuring we:

- Do not use compulsory or forced labor in any of our operations;
- Do not use child labor in any of our operations;
- Comply with applicable laws, industry standards and relevant collective agreements on wages, working hours, breaks, public holidays and compensation in case of overtime;
- Respect freedom of association and the right for employees to be represented by a trade union for the purpose of collective bargaining; and
- Make sure that all employees know the basic terms and conditions of their employment.

## Organisation's structure

The Envision Energy group (the "**Group**") is a world leading net zero tech partner providing wind turbines, energy storage, energy management software and energy technology services in the renewable energy sector. The ultimate parent company of the Group is Envision Energy International Limited (HK). The Group is headquartered in Shanghai with over 3000 employees globally, and approximately 130 international employees across the Group's various regional offices in Asia, Europe, and North and South Americas.

The Group has a global annual turnover in excess of £36 million.

## Our business

Our business is organised into a number of business units, including but not limited to, manufacturing, R&D, development, import, export, supply and service operations. The operations are facilitated by Group companies and employees via a Centre-of-Excellence model, with offices located in Asia, Europe, and North and South Americas.

Each regional office provides specialised services or support functions to the realisation of the Group's global activities and objectives.

## Our supply chains

Our supply chains include, but are not limited to, producers, vendors, sub-contractors, importers & exporters, distributors, warehousing services and transportation & logistic companies.

Envision conducts internal and external third-party audits of our supply chain and supply chain partners and is committed to actioning any recommendations.

## Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Group's compliance policies / rules, including but not limited to, its *Whistleblowing Policy*, *Employee Code of Conduct*, *Supplier Code of Conduct*, *Four Compliance Red Lines*, *Envision Energy Labour Rights Protection and Social Responsibility Implementation System*, *Envision Energy Supply Chain Sustainability Management Policy*, *Prohibition of Child Labour and Child Labour Remedial Management Procedures*, *Policy and Procedures for Juvenile Workers* are consistently enforced (internally and externally) and reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains;



- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;
- Conduct sanction screening of our supply chain; and
- Protect whistle blowers.

### **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- Assessing risks in the provision of particular services;
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts;
- Requiring improvements to substandard employment practices; and
- Sanctioning suppliers that fail to improve their performance in line with our requirements.

We publish our Supplier Code of Conduct on our website which we require all suppliers sign to attest that:

- They don't use any form of forced, compulsory or slave labour;
- Their employees work voluntarily and are entitled to leave work;
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment;
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons; and
- They don't require employees to surrender their passports or work permits as a condition of employment.

Should any supplier fail to adhere to these requirements, a dedicated compliance team, which may consist of involvement from members of the Legal, Human Resource, Audit and Compliance, Procurement & Sales teams, will conduct an independent assessment of the supplier and, if necessary, sanction the supplier from future use by Group companies.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also request our business partners to

provide training to their staff and suppliers and providers. We conduct periodic audits of compliance training completion records of our staff and business partners.

### **Our effectiveness in combating slavery and human trafficking**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

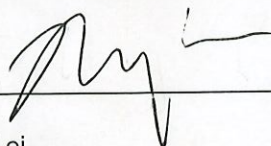
- How many employees have completed mandatory training?
- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?
- What are the findings of our cross-functional team, which reviews how we are addressing modern slavery and human trafficking?

In 2022 Envision contracted SGS-CSTC Standards Technical Services Co., Ltd. (hereafter referred to as "SGS"), an international audit company founded in 1878 and headquartered in Geneva, to undertake a comprehensive Labour and Working Condition Assessment of Envision and our core suppliers. Envision has implemented all actions to address the issues/gaps for improvement identified by SGS.

### **Continuous Development**

We believe the effort to stem modern slavery and human trafficking must be a continuous effort at all levels within the Group and with our suppliers. As such, we make an unwavering commitment to the improvement of our internal processes and relationships with suppliers to ensure every possible step is taken to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for all Envision Energy group global operations and services for the financial year ending 31 December 2022. It was approved by the board on 06 October 2023.



ZHANG Lei  
Founder and CEO

**ENVISION ENERGY INTERNATIONAL LIMITED**

Date:

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