



**Customs Act Public Safety  
Report 2024**

## Table of Contents

INTRODUCTION .....	2
REPORTING CONTEXT .....	2
OUR CORPORATE FRAMEWORK, COMMERCIAL OPERATIONS, AND SUPPLY CHAIN NETWORK .....	2
OUR SUPPLY CHAIN NETWORK .....	3
1. Purpose and Scope .....	4
2. Occurrence of Modern Slavery .....	4
3. Our Policy .....	4
4. Compliance .....	5
5. Reporting Modern Slavery .....	5
6. Responsibility and Implementation .....	6
MODERN SLAVERY RISKS .....	6
OUR ACTIONS TO ADDRESS MODERN SLAVERY RISKS .....	7
REMEDICATION STRATEGIES EMPLOYED .....	8
OUR TRAINING AND AWARENESS .....	8
EVALUATING OUR EFFICIENCY .....	9
VISION IN LONGER TERM .....	9
REPORT APPROVAL AND ATTESTATION .....	10

## INTRODUCTION

### GOLDBECK SOLAR CANADA CORP.

**GOLDBECK SOLAR** is a renowned international company specializing in the comprehensive construction of ground-mounted photovoltaic systems and commercial rooftop installations. With over two decades of experience in optimizing and building top-tier solar power plants, the company has established itself as a key player in multiple markets. The North American subsidiary, established in 2011, brings extensive expertise in engineering, constructing, and commissioning exceptional photovoltaic systems.

One of their distinctive strengths lies in the integration of EPC services, complemented by their skilled construction team, which provides fixed or tracking substructures tailored to the specific technical and environmental requirements of the North American market. This vertical integration, although optional, ensures process reliability, execution quality, and enhanced efficiency, resulting in high-performing solar assets.

As a leading North American Solar Energy infrastructure company operating in both Canada and the U.S., GOLDBECK SOLAR acknowledges the existence of risks related to forced labor and child labor, commonly referred to as modern slavery. We recognize our role in promoting human rights and responsible business practices.

We understand that effectively managing these risks necessitates a collaborative approach involving our suppliers, workforce, and external stakeholders. This report, the Report, provides an overview of GOLDBECK SOLAR's governance processes, existing measures, and progress made in the 2023 fiscal year to prevent and mitigate the risks of modern slavery across our supply chain.

For more information, please visit the GOLDBECK SOLAR website at [www.na.goldbecksolar.com](http://www.na.goldbecksolar.com).

## REPORTING CONTEXT

References to "GOLDBECK SOLAR NA", "we", "our", and "the Company" in this Report pertain to GOLDBECK SOLAR NA and all the entities listed within. This joint report, submitted by GOLDBECK SOLAR NA Corporation, represents both GOLDBECK SOLAR NA and GP Joule Canada corp., entities authorized to import goods into Canada. The collaboration in filing this report underscores the shared commitment to transparency and accountability in supply chain practices.

This Report is a joint report filed by GOLDBECK SOLAR NA Corporation on behalf of itself and the GP Joule Canada corp. that are licensed to import goods into Canada.

## OUR CORPORATE FRAMEWORK, COMMERCIAL OPERATIONS, AND SUPPLY CHAIN NETWORK

GOLDBECK SOLAR NA is the sole parent company of the entities covered in this Report and is headquartered in Toronto, Ontario.

GOLDBECK SOLAR NA operates in three core businesses – Solar Power Projects Development, EPC Project and Operations and maintenance of Solar Assets.

GOLDBECK SOLAR NA has centralized corporate and administrative functions that provide governance, financing, procurement, and other support to all GOLDBECK SOLAR NA's core businesses, as well as to the affiliates and subsidiaries covered by this Report.

## OUR SUPPLY CHAIN NETWORK

Through its centralized function, the supply chain team at GOLDBECK SOLAR NA streamlines the procurement process and enhances operational efficiency across North America. By working closely with suppliers who align with the company's standards, the team helps to maintain a high level of quality and consistency in the products and services utilized for various projects. Additionally, by monitoring supplier metrics, the team can identify areas for improvement and address any discrepancies or non-conformances promptly.

In 2023, the majority of GOLDBECK SOLAR NA's total spend was directed to support EPC projects and operations in Canada, followed by the U.S.

The majority of spend was attributed to the following categories:

- Construction of solar projects: encompassing products and services necessary for building new utility scale solar plants and their related facilities/infrastructures.
- Operations of solar plants: covering the expenses associated with the production and delivery of spare parts to GOLDBECK SOLAR NA managed solar farms.
- Maintenance of solar plants: involving the expenditure required for servicing and upkeeping the quality of our assets.

### GOLDBECK SOLAR NA's Total Import Value for 2023 by origin country:

Country of Origin	Import Value Percentage
Canada	33%
USA	27%
China	9%
Vietnam	20%
Turkey	2%
Italy	4%
Germany	4%
Other	1%

*Figure 2: Data from the Company's internal Information, January - December 2023.*

## OUR POLICIES AND DUE DILLIGENCE PROCESS

### 1. Purpose and Scope

Currently GOLDBECK SOLAR has Anti Modern Slavery Policy <https://goldbecksolar.atlassian.net/wiki/spaces/GAWI/pages/362971137/Anti-Modern+Slavery+Policy> established to communicate and to ensure compliance with all anti modern slavery and human trafficking regulations. Additionally, this policy aligns to the ethical standards and Compliance Policy of GOLDBECK SOLAR and its group of companies.

The policy covers all GOLDBECK SOLAR group company employees, suppliers and third-party providers and is intended to ensure all are aware of the responsibilities they hold. We also have our comprehensive Compliance Policy, which is relevant to modern slavery and should be read in conjunction with and supplement this AMSP.

### 2. Occurrence of Modern Slavery

Modern Slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, servitude, forced compulsory labor, bonded and child labor and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The latest International Labour Organisation (ILO) estimates show there are an estimated 160 million children in child labor, and an estimated 27.6 million children and adults in forced labor globally. As product manufacturing and distribution supply chains is often a complex process, we must ensure we address the eradication of modern slavery throughout our entire supply chain and not just focus on the end product. We must also consider our third-party and service providers employed to support both the product and service offer we give to our customers.

### 3. Our Policy

Our policy does not allow for any form of modern slavery or human trafficking. We continuously strive to take proactive steps to ensure that no acts pertaining to modern slavery are occurring in any part of our business or supply chains.

We do not engage with organizations which facilitate any form of modern slavery, and the policy is not only limited to the use of child labor or forced labor as defined by the ILO but it also ensures to recognize freedom of association or collective bargaining.

We require that the suppliers and third parties we work with should hold their own suppliers and contractors to the same standards.

We seek to continually improve awareness of the practices necessary to combat modern slavery and human trafficking and assess the risk profile of our business in these areas.

In addition to the above, our zero-tolerance approach to modern slavery includes our commitment to the following:

- we will comply with all relevant laws, statutes and regulations relating to modern slavery.
- we will publish Modern Slavery Statements in accordance with the relevant legislation.

- we will seek to educate and raise awareness for identifying and reporting of modern slavery across our business.

#### 4. Compliance

We are committed to the prevention, detection and reporting of modern slavery in any part of our business or supply chain.

By applying our separate Compliance Policy to employees at all levels of the GOLDBECK SOLAR group, we ensure compliance with anti-modern slavery measures across our organization, including directors, officers, agency workers, seconded workers, volunteers, and interns at all times.

We have a robust governance structure in place, including a separate Supplier Code of Conduct for suppliers and third-party providers, which we implement in our supply chain using reasonable commercial efforts, and take a risk-based approach to our contracting processes which are then kept under review. We ensure compliance with this anti-modern slavery policy with suppliers and third-party providers by:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- implementing a general approach as to evaluating the modern slavery and human trafficking risks of each new supplier or subcontractor.
- where necessary, conducting supplier audits or assessments, either through our own staff or third-party auditors, where general risks are identified.
- creating an annual risk profile for each supplier.
- being an active member in the PV industry associations and closely follow up on alerts regarding potential modern slavery activities; and
- invoking sanctions against suppliers that fail to improve their performance in line with our requirements on anti-modern slavery or that seriously violate our separate Supplier Code of Conduct, including the termination of the business relationship.

We use commercially reasonable efforts to retain the right to audit our suppliers' and third-party providers' activities and, where practical, relationships, both routinely and at times of any reasonable suspicion.

If we find that any of our suppliers or and third-party provider have breached our requirements relating to anti-modern slavery and human trafficking, we ensure that we take appropriate action.

Any employee who breaches our Compliance Policy may face disciplinary action, which could result in dismissal for misconduct in accordance with the applicable labor legislation.

#### 5. Reporting Modern Slavery

Employees, suppliers, and third-party providers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of the anti-modern slavery provisions applicable to them.

All employees of the GOLDBECK SOLAR group are encouraged to report any incidence or suspicion of modern slavery and / or human trafficking in any part of our business or supply chain to any line

manager up to the CEO, and they also have the choice to anonymously report to a third-party reporting platform GOLDBECK SOLAR is a member of.

Any supplier or third-party provider can report any such suspicion to its Category Manager or business contact with the GOLDBECK SOLAR group, and they also have the choice to anonymously report at [whistleblower@goldbecksolar.com](mailto:whistleblower@goldbecksolar.com)

We encourage openness and support anyone who raises genuine concerns in connection with modern slavery and / or human trafficking, even if they turn out to be mistaken. Any reports are treated confidential and acted upon as appropriate.

## 6. Responsibility and Implementation

Our Board of Directors has overall accountability for ensuring that this policy complies with our legal and ethical obligations, and that all our people comply with it.

The Head of Procurement is responsible for:

- Implementing the policy within our supply chain
- Communicating appropriately the goals and contents of this policy to all relevant suppliers and third-party providers.

This policy is available on the GOLDBECK SOLAR group website [www.goldbecksolar.com](http://www.goldbecksolar.com) and will be reviewed on an annual basis or as required in accordance with any updates to relevant legislation.

## MODERN SLAVERY RISKS

GOLDBECK SOLAR NA's greatest risk exposure to forced labour and child labour is through suppliers, and the primary sources of these risks come from procuring goods in higher-risk geographies and sectors. We recognize the potential risks of forced labour and child labour in our extended supply chain and the complexity and challenges in operationalizing modern slavery compliance.

As part of this analysis, a risk review of our supply chain activities was conducted to identify the geographical regions, industries, and suppliers with high-risk exposures to forced labour and child labour and assess the effectiveness of any controls in place.

Because our supply chain function is centralized, the review applies to all the entities listed in this joint Report.

The following activities were part of the review:

- Established a core team consisting of internal stakeholders within supply chain to align internal activities and further enhance due diligence and risk management activities related to key sustainability issues, such as human rights.
- Ongoing mapping of our supply chain with suppliers who have directly contracted with the Company (Tier 1 level) and the Tier 1 and second level suppliers for our higher risk suppliers.
- Initiated a review of internal policies for preventing forced labour and child labour in the supply chain, procurement policies, supplier due diligence, onboarding, and compliance processes.
- Reviewed internal educational training, processes for reporting suspicious or actual violations, and supply chain contract templates for language that prohibits forced labour and child labour;

- Analysis of GOLDBECK SOLAR NA and affiliates customs import data from the Canadian Border Services Agency.
- Initiated ongoing improvements to internal supply chain processes, policies, and training; and
- Leveraged third-party sustainability management and market intelligence tools to continuously scan and monitor supply chain activities with the highest human rights and sustainability risks.

Based on the review of our supply chain activities, solar panels and fabricated components were identified as presenting the highest forced labour and child labour risk exposure to GOLDBECK SOLAR NA.

While the information above represents the current known risks of modern slavery for GOLDBECK SOLAR NA, it characterizes the findings from our initial supply chain review at a particular time. More work is underway internally to monitor supplier activities efficiently and effectively with respect to modern slavery, and high-risk categories and countries may change in the future as we learn more.

## **OUR ACTIONS TO ADDRESS MODERN SLAVERY RISKS**

GOLDBECK SOLAR NA utilizes a risk-based model to manage modern slavery risks in our supply chain. We leverage various processes to screen and monitor suppliers and our global supply chain for human rights risks, including forced labour and child labour. These processes and actions apply to all the entities listed in this Report.

In accordance with our process, suppliers that are providing materials and services for our projects and operations must register and onboard through our supplier qualifications and governance team within supply chain, which conducts risk screening and monitoring in conjunction with the corporate compliance department.

GOLDBECK SOLAR NA uses an internal vendor qualification and onboarding process to qualify and monitor the Company's supplier base. A questionnaire is sent to suppliers to help determine each supplier's risk profile and understand their corruption, forced labour and child labour, and anti-bribery and corruption risk exposure. Additionally, the questionnaire requests information from suppliers as to whether they have policies and processes that deal specifically with forced labour and child labour.

In addition to the above, the supplier risk classification process includes reviewing results from various third-party counterparty screening tools. These independent, third-party tools provide a comprehensive due diligence screening based on global news and information sources and risk categories, including ABC risk exposure, beneficial ownership, sanctions, and adverse media.

For suppliers that meet a residual risk exposure level for activities connected to child and forced labour based on their questionnaire answers and third-party screening searches, GOLDBECK SOLAR NA follows up with further requests for information and escalation to senior management, where appropriate.

Other, additional requirements or actions could include:

- Enhanced contractual terms.
- Supplier certifications.
- in person or Third-party inspections in the local jurisdiction; or



- Termination of the relationship.

Following the preliminary risk screening and onboarding, the classified suppliers are loaded into the Company's approved manufacturer and supplier's database. Upon initial entry and following a quarterly frequency, all suppliers within the Company's approved list undergo a screening using the Company's Supplier Code of Conduct document. This Supplier Code of Conduct aims to set environmental, social and governance (ESG) standards and to ensure that the Supplier operates in a way that is consistent with GOLDBECK SOLAR's values and expectations. The audit performs forced labour, child labour, and sanctions screening utilizing various lists including:

- The CBP-Forced Labor List, established under Section 307 of the Tariff Act of 1930, serves as a legal framework that strictly forbids the entry of merchandise into the United States if it has been mined, produced, or manufactured using forced labor, including forced child labor, in any foreign country. This regulation aims to combat and prevent the exploitation of vulnerable individuals who are subjected to labor practices against their will.
- The UFLPA Entity List, which operates under the Uyghur Forced Labor Prevention Act, plays a crucial role in addressing the issue of forced labor in the People's Republic of China, particularly in the Xinjiang Uyghur Autonomous Region. This act empowers the Forced Labor Enforcement Task Force to develop a comprehensive strategy that supports the enforcement of importation prohibitions on goods manufactured, either wholly or partially, through forced labor.

If issues are found, they are escalated to senior management for review and action in accordance with GOLDBECK SOLAR NA's internal escalation procedure. High-risk suppliers, materials, and manufacturing sites that are flagged by GOLDBECK SOLAR NA's internal processes may be subject to additional internal due diligence screening and risk controls.

**In 2023, no suppliers audited and approved for supply in GOLDBECK SOLAR NA's projects and operations were found to have forced labour or child labour issues.**

## REMEDICATION STRATEGIES EMPLOYED

When identifying the risks of forced labour or child labour in the Company's activities and supply chain, GOLDBECK SOLAR NA primarily focuses on understanding the operations and supply chain of our Tier 1 suppliers and the Tier 1 and second level suppliers for our higher-risk suppliers.

Since GOLDBECK SOLAR NA's processes and tools did not yield any evidence of forced labour or child labour, we did not implement any remediation measures in the 2023 fiscal year.

## OUR TRAINING AND AWARENESS

Suppliers are provided with the Supplier Code of Business Ethics Policy to strengthen expectations and awareness of human rights issues. In addition, we conduct specialized, in-person training sessions that are strategically designed to tackle the unique challenges faced in high-risk areas. This training framework demonstrates our commitment to fostering a culture that not only understands but also champions human rights throughout all aspects of our operations and supply chain.

## **EVALUATING OUR EFFICIENCY**

GOLDBECK SOLAR NA is dedicated to establishing a strong and transparent supply chain that upholds the human rights of all workers involved. In 2023, our primary focus was on strengthening our foundational capabilities and processes to effectively manage our suppliers and address critical issues related to forced labor and child labor. Our goal is to ensure that human rights are upheld and respected throughout our supply chain.

To achieve this, the Company conducts an annual policy review with input from various stakeholders, including Environment, Social and Governance (ESG) and Sustainability groups. We thoroughly investigate and monitor all internal and external reports, utilizing the Ethics Helpline as an additional channel for reporting. Regular risk-based assurance activities are also conducted, which may involve independent audits or internal assessments focused on the supply chain.

While we have confidence in the effectiveness of our measures to prevent and mitigate forced labor and child labor at the Tier 1 level, GOLDBECK SOLAR NA remains committed to maintaining and improving our sustainable and transparent supply chain. We recognize the complexity of our global supply chain networks and actively engage in activities such as assessing contractual terms and collaborating with suppliers to evaluate the impact of their actions in addressing forced labor and child labor. Tracking relevant performance indicators allows us to measure the effectiveness of these efforts and make informed decisions for continuous improvement.

## **VISION IN LONGER TERM**

GOLDBECK SOLAR NA is dedicated in utilizing our size and purchasing power to educate and influence our external partners in investing in the protection of human rights for all workers in the supply chain. The eradication of forced labor and child labor in the global supply chain is a multifaceted social, economic, and governance issue that necessitates collaboration and partnership among industry, suppliers, governments, and non-profit organizations. Collaboration is a fundamental value for us, and our supply chain partners play a vital role in developing collective solutions. This necessitates the strengthening of our relationships with our supply chain.

As part of our ongoing efforts to improve, we will continue to identify emerging risks. Additionally, the company intends to further develop and implement due diligence policies and processes to identify, address, and prohibit the use of forced labor and child labor in our operations and supply chain.

## REPORT APPROVAL AND ATTESTATION

I confirm that I have thoroughly reviewed the information provided in the Report for the entity or entities mentioned above, in compliance with the Act and specifically section 11. To the best of my knowledge and after conducting due diligence, I verify that the information presented in the Report is accurate, true, and comprehensive for the specified reporting year, as required by the Act.

Additionally, I am authorized to represent GOLDBECK SOLAR NA Corporation.

Constantin Lindenmeyer

**Name:**



**Signature:**

CEO GOLDBECK SOLAR Canada Corp. | GOLDBECK SOLAR USA, Inc

**Job Title:**