

Trina Solar

Response received by BHRRRC from Trina Solar regarding assessment of exposure to and steps taken in response to forced labour issues in XUAR as documented by Sheffield Hallam University, among others, 14 July 2023.

(1) Assessment of exposure

“To start with, Trina Solar does not have manufacturing operations in the Xinjiang region. On the “In Broad Daylight” report itself, we note that the materials have been collated from a number of secondary sources, some of which are later contradicted by way of an explanation or elaboration and a factual denial from a primary source. As such, the reliability of these cannot always be assessed from the design of the research methodology underpinning the work. The authors themselves state that, given the nature of the sources reviewed, the information derived may not be wholly accurate and they refer to logistical difficulties posed in their research. We are particularly concerned that adverse inference from publicly available sources were made without always testing them. The Report also concedes that by the time of its publication, global solar industry companies had already committed to an industry-led solar supply chain traceability protocol in order to identify and track raw materials and inputs into finished solar module products tainted by forced labour involvement in the production process.

Moreover, despite our best efforts to engage with the Helena Kennedy Centre, the authors of the report have been unwilling to meet us. We appreciate the request by the BHRRRC as an opportunity to provide the facts and processes around our due diligence and supply chain practices, therefore:

Independent of geographies or activities, Trina Solar has a clear zero-tolerance policy as regards any form of illegal employment, including forced or child labour. This approach has been subject to our code of conduct, with third party auditing being done on an annual basis since 2014, and is executed across our supply chain management, whether by means of strict supplier assessment procedures or audits.

To demonstrate our supply chain commitments, Trina Solar was among the first companies of its kind to develop complete supply chain traceability, mapping all our manufacturing and supplier operations using advanced IT systems that share the products’ full history from source to consumer. This system, based on Phegda Big Data System technology, supports batch query according to a Bill of Lading (“B/L”) number or multiple batch numbers. By entering either a B/L number or batch number(s), the system can generate the trace report for a particular shipment of solar modules. It is available to customers upon request.

This commitment to provide full traceability and the robustness of our social responsibility policies led to Trina Solar becoming the first in the industry to pass the U.S. Customs and Border Protection supply chain traceability certificate under WRO regulations, and in June 2022, we were the first company to pass the audit after the implementation of the UFLPA law. The UFLPA specifically requires all importers to demonstrate due diligence, effective supply chain tracing and supply chain measures to ensure that Trina can full and comply with any legal regulations and requirement .

We also started our supply chain audits as early as Q3 2022 for upcoming initiatives in Europe. Our traceability system not only relies on big data processing, but on blockchain technology to ensure the authenticity of information. The purpose of our work is to accurately comply with the laws of each sales target country.

In addition, Trina Solar acts in support of the pilot Solar Energy UK and SolarPower Europe’s Solar Stewardship Initiative (SSI) to support the development of a comprehensive new sustainability standard for the industry. Among other things, the initiative is aimed at establishing mechanisms to create supply chain transparency on the original of materials.”

(2) Steps taken in response

“As set out above, Trina does not have any manufacturing operations in the Xinjiang region.

In 2022, we initiated the establishment of an own silicon manufacturing site as part of our ongoing efforts to enhance due diligence measures throughout the supply chain. The site's production capacity has been ramped up to over 40GW to fully support our wafer requirements for module production.”

“Trina Solar performs internal CSR audits on a regular basis, using document review, site inspection and employee interviews. Trina Solar has also been among the first in the sector to be 3rd-party certified against Global Corporate Social Responsibility Achievements (Ecovadis) since 2014 Trina Solar publishes an annual CSR report, providing an overview of KPIs for the past year and confirming that no forced labour is used. All employees complete mandatory compliance training annually, in which they are required to acknowledge their responsibility to comply with all governing laws and regulations. Trina Solar also provides a publicly available whist blower line.

We want to point out that Trina Solar adheres to the UN Global Compact, the Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework (UNGP), the OECD Guidelines for Multinational Enterprises, the Tripartite Declaration of Principles Concerning Multinational Enterprises, and the Social Policy of the International Labour Organization. Trina Solar is fully committed to upholding fair labour practice. The company's code of conduct is mandatory for all employees and outlines its values and guiding principles, which include conducting ethical business throughout our global supply chains.

Trina Solar communicates the importance of fair treatment of labourers and transparent investigation into the origin of materials and working conditions to its suppliers. The company uses various methods, such as contract terms, letters of commitment, shared tracing information, and supplier audits to ensure its suppliers comply with their social responsibility obligations.

In addition, Trina Solar publishes an annual Environmental, Social and Governance (ESG) Report that provides an overview of key performance indicators (KPIs), including due diligence and labour indicators, from the previous year. Trina Solar employees complete mandatory compliance training annually to acknowledge their responsibility to comply with all governing laws and regulations, including labour practices.

Among the commitments we have taken on social matters are :

- To creating a safe, healthy, and environmentally-friendly workplace for employees, helping them pursue a better quality of life, for them to grow and develop together with Trina Solar while improving work efficiency.
- To resolutely not employ child labour and strictly prohibit forced labour.
- To carry out training on employee safety, skills, and human rights policy
- To fulfilling its environmental and social responsibilities and transmitting the vision and practice of sustainable values which we uphold to the group's partners and all
- To adhere to the employment principles of anti-gender discrimination and equality
- To insist on the sustainable development of the supply chain and build a cooperative community
- To support the protest work and fulfil social responsibilities »