



Heliene Policy to Combat Forced labor and Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as involuntary servitude, forced labor, debt bondage, and human trafficking. Whether affecting adults or children, all forms of slavery involve the deprivation of a person's liberty to exploit him or her for personal or commercial gain.

Heliene Inc., together with its subsidiary Heliene USA Inc. ("Heliene"), is committed to complying with anti-slavery laws and regulations in every jurisdiction in which it conducts business, including compliance with disclosure obligations under applicable legislation, and to acting ethically and with integrity in all its business dealings and relationships.

Consequently, Heliene is committed to ensuring that modern slavery does not take place anywhere in its business, including through its supply chain. The prevention of modern slavery, and the detection and reporting of modern slavery should it occur in any part of Heliene's business or business relationships, is the responsibility of every person working for Heliene, including its employees, seconded workers, directors, officers, volunteers, interns, agents, and representatives. All such persons must avoid any activity that might constitute or result in a breach of this Policy, and all such persons are expected to report any violation of this Policy should one arise.

Heliene expects its third-party supplier, contractors and other business partners to similarly act to prevent modern slavery. As part of its contracting process, Heliene communicates this Policy to all of its third-party suppliers, contractors and other business partners, and requires compliance with anti-slavery laws and regulations through a Supplier Code of Conduct.

Heliene expects its business partners to share its strong commitment to combatting modern slavery and to conduct its business accordingly. Heliene will not tolerate any parties directly or indirectly engaging in modern slavery.

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal and legal action. Any third party that breaches this Policy may have its relationship with Heliene terminated and face legal action.

This Policy does not form part of any employee's contract of employment and Heliene may amend it at any time. Any person who suspects that a violation of this Policy has or may have occurred (or may occur in the future) is expected to notify his or her direct manager, Heliene's Legal Department, and Heliene's Corporate Compliance Office. Any person that is not comfortable notifying any of the foregoing parties should report the suspected breach (or risk of breach) through Heliene's Whistleblower hotline by email (whistleblower@heliene.com).

Heliene encourages feedback regarding actual or potential violations of this Policy, and will support any report of a genuine concern made in good faith, even if the report turns out to be mistaken. Heliene is committed to ensuring no one suffers detrimental treatment (including dismissal, disciplinary action, threats or other unfavorable treatment) as a result of reporting in good faith his or her suspicion that modern slavery of any form is or may be taking place in any part of Heliene's business or the business of Heliene's partners

The Chief Supply Chain Officer is responsible to monitor and manage compliance with this policy assisted by the rest of the executive team.

For supply chain operations, the Policy is further supported by five key steps and documents:

1. A Supplier Code of Conduct. Our requirements and expectations for suppliers are detailed in our Supplier Code of Conduct (“**Supplier Code**”). Heliene expects all products or services provided to Heliene to be designed, manufactured, and delivered in accordance with this Supplier Code.
2. The Solar Supply Chain Traceability Protocol (“**Protocol**”) as published and amended from time to time by the Solar Energy Industries Association (SEIA). This protocol detailed all the supply chain visibility requirements expected by Heliene from its suppliers.
3. Supplier Cooperation Agreements with our suppliers to ensure adherence and enforceability of the Supplier Code and the Protocol. The information is routinely requested to detect changes in the supply chain composition.
4. Mapping of the value chains, evaluation of the documents and cross references with governmental and private data base to ensure that the Supplier is not transacting with:
 - (i) entities in the Xinjiang Uyghur Autonomous Regions of China (XUAR) that produce goods using forced labor;
 - (ii) entities that work with the Xinjiang government to recruit, transport, transfer, harbor, or receive forced labor or Uyghurs, Kazakhs, Kyrgyz or members of other persecuted groups out of Xinjiang;
 - (iii) products made by entities in lists (i) and (ii);
 - (iv) entities that export products identified in (iii) from the PRC to the United States or Canada;
 - (v) entities and facilities that source material from Xinjiang or from persons working with the Xinjiang government or the Xinjiang Production and Construction Corps (XPCC) for purposes of any government-labor scheme that uses forced labor; and
 - (vi) listed entities on the UFLPA Entity List (available at <https://www.dhs.gov/uflpa-entity-list>).
5. Engagement with suppliers directly or through third parties to clarify any doubts, to audit authenticity of statements made or to support continuous improvement for visibility or risk mitigation.

Management Systems

Heliene has developed a management system to drive continuous improvement and ensure compliance with applicable laws to combat forced labor. The system is integrated into our ISO management system.

Relevant documents are kept in the supplier folder. A training is offered to all employees attached to the purchasing department as part of the onboarding process. A refresh training is offered on an annual basis. Employees must sign a training record.

Senior management routinely review and assess the quality and efficiency of the management systems and programs. An annual report provides a comprehensive view of the situation.

Heliene maintains, retains, and disposes of business records in full compliance with applicable legal requirements along with appropriate confidentiality to protect privacy.