

SCHLETTER

CODE OF CONDUCT

FOR PARTNERS

VERSION 2.0

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CODE OF CONDUCT

FOR PARTNERS

PREAMBLE

The companies of the Schletter Group ("Schletter" or "we") are aware of their global responsibility with regard to observing applicable laws and environmental, compliance, and labor standards in all countries where we operate, along with respect for human rights in general.

We take this responsibility very seriously, which is why we pledge to comply with all applicable laws and government regulations, and observe ethical business practices to prevent any and all forms of legal and regulatory violations, especially with regard to labor conditions, safety and security, protecting people's health, and modern-day slavery and human trafficking.

Beyond that, we also strive to conserve energy and manage it wisely in our activities, and respect the cultural circumstances of the countries where we do business.

We have zero tolerance for corruption of any kind, and our global corporate guidelines are outlined in our code of conduct, which all employees are obligated to observe.

OBLIGATIONS OF OUR PARTNERS

In keeping with this stance, we also expect our partners to uphold their responsibility to comply with all applicable laws and regulations, observe ethical business practices, require their own business partners to do the same (particularly along

the supply chain), and monitor their own and their business partners' compliance.

This code of conduct is therefore an integral element of all business relationships between Schletter and its partners. Any violation of this code of conduct may result in termination of the business relationship and assertion of claims.

The Code of Conduct for Partners is based on:

- The Schletter Group Code of Conduct dated September 1, 2023
- the United Nations Universal Declaration of Human Rights dated December 10, 1948
- the labor standards of the International Labour Organization (ILO), particularly the eight Core Labour Standards dated June 18, 1998
- the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) of the International Labour Organization (ILO)
- the ten principles of the UN Global Compact
- the UN Convention Against Corruption dated October 31, 2003
- the OECD Guidelines for Multinational Enterprises dated May 25, 2011
- the United Nations Rio Declaration on Environment and Development dated June 14, 1992
- the UK Modern Slavery Act dated March 26, 2015
- the Australian Modern Slavery Act dated December 10, 2018

COMPLIANCE WITH LAWS AND REGULATIONS

Each partner pledges to comply with the applicable laws and regulations of the countries where that partner does business.



RESPECT FOR HUMAN RIGHTS AND WORKER RIGHTS

All partners must respect human rights. Partners pledge to treat their employees with fairness, dignity, and respect. The personal rights, dignity, and privacy of employees must be upheld.

Every partner must take appropriate action to ensure its products do not use raw materials that directly or indirectly finance armed groups or violate human rights. This relates in particular to responsible sourcing of materials.

Schletter operates a compliance management system to ensure these measures are observed. This includes but is not limited to introducing guidelines, training activities, and measures to raise awareness. An independent unit (Internal Audit) was also created within the company to audit compliance with guidelines at regular intervals.

Our partners commit to not discriminating against their employees in hiring and employment on the basis of sex, gender, age, ethnic origin, nationality, skin color, disability, sexual orientation, religion, political views, or similar characteristics and not to expose them to reprisals. There must be zero tolerance for any and all forms of physical or psychological violence against employees and sexual harassment.

We also expect our partners to take appropriate action to ensure they do not use, contribute to, or otherwise benefit from slavery, servitude, forced or compulsory labor, or human trafficking.

All partners must comply with national laws and international agreements establishing the minimum age of employees. Where no minimum age is stipulated by law, partners are prohibited from employing anyone under the age of 15 years.

The compensation and social benefits provided to employees of the partner must adhere to applicable local laws and be fair and appropriate. Where there are no applicable local laws on this point, employees' compensation and benefits must be adequate to meet their basic needs at a minimum.

The partner must ensure working hours are in keeping with the relevant national statutory specifications at the least, or that the minimum

standards of the relevant national economic sectors are observed. Where there are no statutory specifications or minimum standards, the international standard established by the ILO, which stipulates a maximum of 48 hours worked per week and a break of at least 24 hours every seven days, applies. According to the ILO, employees must not work more than 12 hours of overtime per week, unless temporarily and in emergency situations such as when urgent repair work is needed.

Partners' employees must have freedom of association and the right to engage in collective bargaining without any preferential or discriminatory treatment.

The safety and health of employees in the workplace must be ensured. Partners must offer a work environment that is conducive to accident prevention and minimizes the health risks to employees. The occupational safety and health regulations of the relevant country must be observed, and employees must be instructed to comply with these regulations.

FAIR BUSINESS PRACTICES

FAIR COMPETITION AND ANTITRUST POLICIES

We expect our partners to conduct themselves fairly as competitors and to observe applicable national and international competition laws, along with antitrust regulations. Unfair pricing or quoting arrangements, market allocation, and abuse of a dominant position are not tolerated under any circumstances.

The laws and rules of fair competition must be observed in all competitive bidding procedures.

PROHIBITION OF CORRUPTION AND BRIBERY

Schletter has a zero-tolerance policy toward corruption and bribery. Schletter does not tolerate any corruption whatsoever, in any form, in its business activities. This also relates to the



business activities of our partners. With this in mind, the specifications set out below apply regardless of whether or not applicable laws stipulate this in detail.

Any and all forms of bribery to influence an official act or obtain a prohibited benefit or perquisite are strictly prohibited. The partner must not request, offer, grant, or provide bribes, payoffs, kickbacks, or other illegal payments or accept any such illegal benefits under any circumstances.

GIFTS, INVITATIONS, AND OTHER PERQUISITES

Whenever a gift, invitation, benefit or other perquisite is offered, promised, or granted, the applicable laws and regulations must be observed, and the matter must never create the appearance of dishonesty or inappropriateness.

In all cases, they must: (i) be proportionate to the occasion and the recipient's position in terms of nature, value, and frequency; (ii) not be offered, provided, requested, or accepted with any expectation of a benefit or perquisite, whatever the nature thereof; and (iii) be transparent and correctly documented in the books and business records.

Any stricter specifications that may apply on the recipients' end must be observed in all cases.

Employees of Schletter and its partners can protect themselves from misunderstandings by observing the following procedures and aids to decision making:

- There are no objections to hospitality for a direct business-related reason or to dining invitations within a reasonable scope.
- There are no objections to giveaways.
- In principle, there are no objections to gifts with a market value of EUR 40 or less (rough guideline) unless they are given immediately before the signing of a contract or negotiations, or to a person's home address or in any other non-transparent manner.
- Cash and cash equivalents such as checks or gift certificates are never allowed.

- Invitations for representative purposes or where the event is mainly or partly for entertainment are permitted only after a separate review of whether the matter is customary business practice and appropriate and if representatives of the host are present, participation is not repeated frequently, and the costs of travel and lodgings are not assumed by the business partner issuing the invitation.

Particular caution must be exercised when dealing with public officials. The relevant employer's rules on gifts and invitations must be observed in all cases.

In case of doubt, Compliance must be consulted.

DONATIONS AND SPONSORING

Donations and sponsoring must take place exclusively on a voluntary basis and in accordance with applicable law. They must not be used to obtain any business advantage unlawfully.

INCLUSION OF THIRD PARTIES

Inclusion of third parties to unlawfully and impermissibly influence employees of government agencies or private individuals is prohibited. With this in mind, we expect our partners to review relevant third parties at the start of the business relationship and continually.

Particularly in the case of consultants and intermediaries, the services rendered and financial consideration must always be appropriate and proportional to each other.

MONEY LAUNDERING AND FINANCING OF TERRORISM

Partners must abide by the relevant statutory obligations and refrain from directly or indirectly supporting or participating in money laundering activities or financing of terrorism in any form whatsoever.



PREVENTION OF CONFLICTS OF INTEREST

Our partners must do business transparently and with integrity, and make business decisions in the best interests of the company, not based on personal interests. Any and all personal interests that could affect the business relationship with Schletter must be disclosed to us immediately after they become known. Appropriate measures must be taken to prevent conflicts of interest.

CONFIDENTIAL INFORMATION, BUSINESS AND TRADE SECRETS, AND INTELLECTUAL PROPERTY

We expect you to handle confidential information of Schletter and third parties such as competitors, customers, and business partners carefully and in compliance with existing agreements and laws. In particular, you must ensure that confidential information and secrets are treated as confidential and not used impermissibly or disclosed to third parties.

You must also respect the rights of third parties and the intellectual property of others, and comply with agreements in this regard.

You must use personal data in compliance with applicable regulations and exclusively for legitimate, stipulated purposes, and protect such data via appropriate technical and organizational measures (TOMs) against loss, modification, unauthorized use, and disclosure.

IMPORT AND EXPORT REGULATIONS

Our partners must comply with customs and import and export control regulations, sanctions, embargoes, laws, regulations, and government orders, decrees, directives, and guidelines with regard to movement, import, export, transit, intermediation, transport and shipping of goods and transfers of technology.

CONTROL SYSTEMS

As a partner, you are expected to have implemented suitable control systems to prevent violations

of the principles outlined above and help investigate potential violations both within your own business operations and in your supply chain.

ENVIRONMENTAL PROTECTION AND PRODUCT SAFETY

Partners are required to observe all relevant legal standards and international environmental protection standards. Environmental impact must be minimized. Appropriate management systems must be implemented to avert environmental risks and improve existing environmental protection standards.

Only safe products and services that are in keeping with the current state of the art can be produced and delivered. In particular, these products must not contain any program routines or technical features that serve to circumvent statutory or regulatory specifications. Partners should promote and support the development and dissemination of ecofriendly technologies.

All permits, approvals, and/or licenses required for operation must be documented, implemented, and reviewed regularly.

You must have a suitable management system (e.g., ISO 14001 or similar) in the area of environmental protection.

REVIEW OF REQUIREMENTS

Schletter reserves the right to review compliance with the requirements through appropriate means. This may include interviews, surveys, checklists, or the use of experts on site.

This kind of on-site audit typically takes place by prior arrangement and in the presence of representatives of the business partner, during regular business hours and in compliance with applicable laws, particularly in relation to data protection and privacy.



WHISTLEBLOWING SYSTEM

Schletter uses a digital whistleblowing system to handle reports of severe violations of regulations and laws by employees of the Schletter group of companies. This means violations that have a severe adverse impact, particularly on the reputation or financial interests of Schletter or any of its affiliates. It is also available to business partners for reporting compliance violations.

The whistleblowing system can be reached in various ways, including via the Schletter website at www.schletter-group.com.

We hereby confirm that we agree with, respect, comply with and apply the values of the Business Partner Code of Conduct as stated in this Business Partner Code of Conduct.

Firm

Division

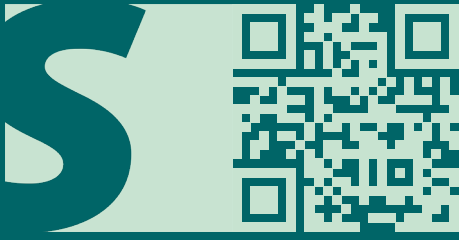
Date



Signature

Function of the signatory





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