

HUMAN RIGHTS POLICY

1. PARTICULARS

Risk category	Human Rights
Risk assessment	Solar Group, to the best of its knowledge, will refrain from working with business partners that are not complying with these standards in their operations.
External reference	EU/local directives, regulations and standards, ILO standards, UN standards, RBA. Code of Conduct
Internal reference	Sustainability Policy, Supplier Code of Conduct
Target group	This Human Rights policy applies to Solar Group and constitutes the framework for how we work and look after employees.
Classification	Public document
Latest update	July 2023
Approved by	CEO
Responsible	Executive Board
Contact person	Director, Sustainability

2. OBJECTIVE OF THE POLICY

As a leading sourcing and services company, Solar commits to act and operate in a responsible manner. Sustainability is an integrated part of our strategy and the way we do business. We are convinced that our commitment to international protocols, laws and regulations makes a difference when it comes to respecting human rights, securing marginalized population and animal welfare, and we respect the transparency act along our value chain.

We have a fundamental respect for the value of human life and dignity and want to foster a culture of respect and inclusion. We want to be a good place to work for our employees and strive to develop talent, teamwork, and diversity. We will pay due attention to the rights and interests of employees, consumers, workers within our supply chain, local communities and other stakeholders affected by our business.

We see respect for the rights and interests of others as necessary to be a trusted company and for achieving Solar's long-term aspirations.

3. POLICY

3.1 Human rights in Solar

In Solar, we do not accept any form of forced labour, neither within our own operations nor within the operations of suppliers and other business partners. Employment in a Solar company shall always be based on a voluntary agreement. Our companies shall

not have internal procedures or carry out activities that prevent employees from leaving the company at their own wish.

Solar shall conduct due diligence for responsible business conduct. This involves; conducting risk assessments to identify potential negative impact on people, society and the environment and to stop, prevent and reduce such impact. The measures put in place are monitored and their effect evaluated. The measures are communicated to those affected by our actions. If our activities are found to cause or contribute to negative impact on people, society or the environment, we will stop the activities and seek to provide remedy. If our supplier is responsible for the negative impact, the supplier is responsible for providing remedy.

Human rights due diligence involves conducting risk assessments to identify and assess potential adverse (negative) human rights impacts associated with our operations, our supply chains and other business relationships, and to cease, prevent or mitigate such impact. The activities shall be monitored, and their effect evaluated. If we identify that we have caused or contributed to negative impacts, we will implement relevant actions to provide remediation, i.e., stop or reverse the adverse impacts. We commit to having effective channels for complaints (grievance mechanisms), that are accessible to all employees, and ask of our suppliers to do the same.

If we identify adverse impacts which are directly linked to our operations, products, or services through our suppliers or other business partners, we will actively influence the entity causing the adverse impact, to cease, prevent or mitigate the impact. We expect our suppliers and business partners to respect human and workers' rights and establish

human rights policies which address the corporate responsibilities outlined in the UN Guiding Principles for Business and Human Rights. If we discover that suppliers or business partners are involved in violations of human rights, we will communicate our concerns and demand that the supplier or business partner take appropriate action, e.g., through a remediation process. If corrective actions are not taken and the violations endure, an assessment shall be made of whether to end the business relationship.

Through Solar's Annual Report we will report on the activities conducted to identify and address actual or potential adverse impacts, including the findings and outcomes of those activities, and make information about our due diligence policies and processes easily available for external stakeholders. This document describes Solar's guiding principles for handling the human and workers' rights which we see as having relevance for our daily operations. It applies to all Solar subsidiaries and Group functions.

Our ethical requirements towards suppliers are described in Solar's Supplier Code of Conduct.

3.2 Principles for addressing human rights

All Solar companies shall work in a systematic manner to respect human rights, in line with the principles described below.

3.3 Freedom of thought, opinion and expression

We value open, fact-based, honest and respectful communication within our own organisation as well as in our dialogue with external stakeholders. We will strive to achieve a working environment where employees feel comfortable in expressing their opinion without fear of retaliation. All our companies should take appropriate steps to make it easy for employees and external stakeholders to raise concerns and make sure that stakeholder concerns are handled in a respectful, fair and professional way.

We respect the freedom of religion, and we will strive to foster a working environment where all our employees feel included regardless of religious beliefs or cultural background. Our companies should be flexible when responding to concerns raised by employees related to religious customs as long as this is not in conflict with business needs or other human rights.

3.4 The right of life

We will do our utmost to protect the health and safety of employees, customers and others linked to our business. All our companies shall commit to the vision of zero harm to people, and work purposefully to create safe, healthy and attractive workplaces, in line with the requirements described in the HSE Policy and Environment Policy.

We will take care to prevent behaviour or working conditions that may negatively influence the mental and physical health of our employees and their families. Managers shall be aware of their responsibility for the safety and wellbeing of employees and use

the power of their position to foster a positive and healthy working environment. Solar does not tolerate any form of coercion, punishment or harassing behaviour towards employees.

3.5 The rights of liberty, security and privacy

In Solar, we do not accept any form of forced labour, neither within our own operations nor within the operations of suppliers and other business partners. Employment in a Solar company shall always be based on a voluntary agreement. Our companies shall not have internal procedures or carry out activities that prevent employees from leaving the company at their own wish.

We want to show due respect for the privacy of employees, customers and other individuals, and our companies shall adopt a restrictive practice towards monitoring or intrusion of employees' privacy.

3.6 Competence development

In Solar, we see employee development as important to achieve our business targets and be an attractive place to work. We want people to grow and flourish so they can deliver at their full potential. Moreover, we want our employees to feel that their efforts are valued and used in a meaningful way. We want to equip our people with the skills needed to be innovative and relevant in their jobs, and to address a potential future skill-gap. The Solar companies should continue to invest in training, education and reskilling

their workforce to grasp the opportunities of changing work patterns and workplaces due to new tools and technologies.

Our employees should receive as minimum annual feedback on the quality and performance of their work and have the opportunity to discuss relevant personal development activities.

3.7 Diversity and no discrimination

We see diversity of perspectives as important to make good decisions, inspire creativity and in general, contribute to business improvement. Our companies shall work systematically to promote diversity in the workplace and prevent discrimination based on gender, religion, race, national or ethnic origin, cultural background, caste, social group, disability, sexual orientation, marital status, age or political opinion. The companies shall foster a culture where personal differences are respected and appreciated, and promote equal opportunity, particularly in relation to recruitment, compensation and benefits, promotions, and training. The companies should also assess how operating processes and working tools can be adapted to physical differences among employees and make reasonable adjustments.

3.8 Consultation and employee involvement

We see good internal communication and cooperation between management and employees as crucial for the company's ability to succeed and for the well-being of employees. Our companies shall allow employees to be heard in decision processes

that have relevance for themselves and the workplace, for example related to occupational health and safety and workforce reductions. Also, our employees shall have the opportunity to become informed about the strategy and progress of the company, for example through the use of intranet and meetings.

We respect the freedom of association and right to collective bargaining and want to foster a respectful and constructive dialogue between management and trade unions. Our companies shall establish channels for dialogue and collaboration between the management and representatives of the employees.

3.9 Fair working terms

We want to provide just and favourable working conditions for our employees. Our companies shall make sure that all their employees, including part time employees and temporary workers, have a written working contract. Working hours shall comply with national law and benchmark industry standards, whichever affords greater protection, and with negotiated company agreements. The work should be organized in a way that allows employees to handle their assigned responsibilities within normal working hours and reasonable actions shall be taken to prevent an unhealthy workload. The use of overtime shall follow national legislation and be based on a framework agreement which has been negotiated with the company's employee representatives.

All Solar companies shall have working terms which allow employees to combine working and family life, including due consideration of parental duties. Employees shall be provided with at least one day off for every seven-day period. All full-time employees

shall, as a minimum, receive wages and benefits which are sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs, including provision for unexpected events.

3.10 Respect for children's rights

We recognise the vulnerability of children and will do our utmost to protect children from physical, mental or moral harm. We respect children's rights and will actively support these through our activities and business relations. No Solar company shall employ individuals who are below the normal age for completing compulsory school, or below 15 years of age, whichever is the highest. Young workers, defined as employees who are above the school-leaving age, but below the age of 18, shall not perform hazardous work, or work to an extent which negatively influences the ability to participate in education activities. If child labour is found within our own operations, we will immediately remove the child from all work, set up a remediation programme to protect the interests of the child and monitor the progress of the programme until the child has reached working age. Such cases shall always be reported to Solar Group, and relevant actions will be determined in a dialogue with business unit and business area.

3.11 Marginalized populations

All our companies shall make sure that their operations do not interfere with the right of self-determination of indigenous people, for example related to land areas or other natural resources upon which they are dependent. If a Solar company has business

plans which may have an impact on a marginalized population, the company shall establish a dialogue with representatives for the population group in order to find a solution which is satisfactory to both parties.

3.12 Animal welfare

Animal welfare must be respected. If a negative impact on animal welfare is detected, we will initiate measures to minimize negative impact on the welfare of production animals and working animals.

Solar companies must comply with national and international animal welfare legislation and regulations.

4. DEVIATIONS TO THE POLICY

No deviations to this policy are allowed.

5. DIVISION OF RESPONSIBILITIES

In Solar, the Executive Board of Directors and the Senior Vice Presidents are responsible for the deployment of the Human Rights Policy throughout Solar.