SUNOTEC Human Rights Policy

Version 2.0

Purpose and scope

SUNOTEC is committed to conducting its business with integrity, fairness, and respect for the dignity and rights of all individuals, affected by our operations, projects, and business relationships.

This Human Rights Policy sets out our overarching commitment to respect human rights in every aspect of our operations and value chain.

It complements and builds upon our existing Code of Conduct and Supplier Code of Conduct, which define the behavioural and ethical expectations for employees, contractors, and business partners.

This policy applies to all individuals performing work for or on behalf of SUNOTEC, whether directly employed, contracted, or engaged through third-party or agency arrangements, as well as subsidiaries and controlled entities worldwide. We expect our suppliers, subcontractors, and partners to uphold equivalent standards.

Our commitment to respect human rights

SUNOTEC respects all internationally recognised human rights, as set out in:

- The International Bill of Human Rights;
- The UN Universal Declaration of Human Rights;
- The UN Guiding Principles on Business and Human Rights (UNGPs);
- The OECD Guidelines for Multinational Enterprises;
- The International Labour Organization (ILO) Core Conventions;
- The ten principles of UN Global Compact;
- UN Women's Empowerment Principles; and
- The Children's Rights and Business Principles.

We are committed to:

- Safe and healthy working conditions – providing workplaces that prevent injury and illness, ensuring appropriate training, protective equipment, and continuous improvement of our Health & Safety management systems.
- Fair terms of employment – upholding fair wages, reasonable working hours, and adequate benefits consistent with national law and international standards.
- Freedom from forced, bonded, or child labour – prohibiting all forms of coercion or exploitation and requiring the same of our business partners.
- Freedom of association and collective bargaining – respecting every worker's right to form or join trade unions of their choice, to bargain collectively, and to engage in peaceful assembly, in accordance with national law and international norms.
- Equal opportunity and non-discrimination – fostering a workplace free from discrimination or harassment on any ground, promoting inclusion and diversity at all levels.
- Respect for privacy and personal dignity – treating all workers with respect and safeguarding personal information in line with data-protection principles.
- Community and stakeholder rights – avoiding adverse impacts on local communities, including Indigenous Peoples, and promoting constructive engagement and shared benefits wherever we operate.

Our commitments regarding fair wages, working conditions, and worker benefits are detailed further in our Environmental and Social Policy and Health & Safety Policy, which together operationalise these principles throughout our projects and business relationships. Expectations for employees are set out in our Code of Conduct, and supplier obligations are defined in our Supplier Code of Conduct.

This Human Rights Policy describes the processes by which we identify, prevent, mitigate, and address human rights risks.

Governance

SUNOTEC's Leadership Team holds ultimate oversight of the company's human rights commitments and performance.

The responsibility for the implementation and review of the Human Rights Policy lies with the Head of Sustainability, in collaboration with relevant business functions.

Human rights considerations are integrated into risk management, supplier selection, and project planning processes.

Regular training and awareness sessions are provided to employees to support effective implementation.

Human rights due diligence

Our approach to human rights due diligence follows the UN Guiding Principles and consists of the following elements:

1. Identification and Assessment

We assess potential and actual human rights impacts related to our operations, projects, and supply chains.

Key focus areas include working conditions at construction sites, temporary labour practices, sourcing and manufacturing of solar modules and components, and potential community impacts from land use.

2. Integration and Action

We integrate our findings into business decision-making and take actions to prevent or mitigate identified risks.

This includes conducting supplier audits, requiring corrective action plans, enforcing labour standards in EPC and O&M contracts, and prioritising suppliers with traceable and responsible sourcing practices, whenever applicable.

3. Tracking and Monitoring

We monitor the effectiveness of our mitigation measures through internal audits, supplier assessments, safety inspections, and project-level reviews.

4. Communication

We communicate publicly on our approach and progress through our annual Sustainability Report and the Modern Slavery Statement.

5. Remediation

Where SUNOTEC identifies that it has caused or contributed to adverse human rights impacts, we will provide or cooperate in effective remediation processes, in line with the UNGPs.

Silent human rights risks

Based on the nature of our engineering, procurement, and construction (EPC) activities in the solar sector, SUNOTEC has identified the following as salient human rights risks:

- Labour rights and working conditions on construction sites and among subcontractors, including fair pay, safe conditions, and working hours;
- Temporary labour vulnerabilities, including recruitment practices and living conditions
- Upstream supply chain risks related to the manufacturing and sourcing of solar panels, polysilicon, and other components, particularly the potential for forced labour and child labour in high-risk regions
- Land acquisition and impacts on local communities related to the rights, livelihoods, and cultural heritage of local and Indigenous communities
- Occupational health and safety risks for site-based workers
- Risks related to equality, discrimination, and inclusion, especially in male-dominated construction environments
- Environmental impacts that may affect community rights to health, water, and a safe environment

These risks are reviewed and updated periodically in light of evolving industry conditions and stakeholder feedback.

Grievance mechanisms

SUNOTEC maintains accessible and confidential grievance channels for employees, contractors, suppliers, and other stakeholders to report concerns about potential or actual human rights violations.

Concerns can be raised in accordance with the procedures outlined in our Whistleblower Policy.

These channels are designed to ensure confidentiality and protection against retaliation.

We ensure that all reports are assessed promptly and investigated impartially.

SUNOTEC believes that respect for human rights is central to a sustainable energy transition.

We are committed to embedding this policy into our culture, operations, and value chain — ensuring that our contribution to the global shift to clean energy is grounded in fairness, dignity, and respect for people.

Date of last update	**Summary of changes**	**Changes made by**
09.01.2021	Policy Created	
13.10.2025	Policy Updated то to include salient human rights, grievance mechanisms, due diligence on human rights and governance process	Dimitar Dimitrov, Head of Sustainability SUNOTEC