

# SUNOTEC Supplier Code of Conduct

## Introduction

SUNOTEC aims to be a reliable and transparent company. Our way of doing business is characterised by integrity and compliance with the law. Therefore, we strive to meet all relevant international, national and regional laws and regulations where we operate. Our activities are determined by our shared values of trust, passion and performance. These values ensure that we have a common identity shared across all SUNOTEC Holding companies and can be found in concrete terms in our Code of Conduct.

We aim to understand and properly manage the impacts, risks and opportunities associated with our activities, as well as those along our supply chain. To that end, we have prepared this Supplier Code of Conduct, reflecting our values and rules for our counterparties. The Supplier Code of Conduct sets binding minimum sustainability requirements for our business partners to advance social and environmental responsibility and business ethics beyond legal compliance, and to communicate them to their employees, service providers and suppliers.

The Supplier Code of Conduct includes key principles set forth in national laws and regulations as well as in the core labour standards of the Conventions of the International Labour Organisation (ILO), the UN Guiding Principles on Business and Human Rights, the 10 Principles of the UN Global Compact, the OECD Guidelines for Multi National Enterprises, the UN Convention Against Corruption, the Minamata Convention, the Stockholm Convention on Persistent Organic Pollutants (POPs conventions) and in the Basel Convention.

## Scope of application

The Supplier Code of Conduct applies to all suppliers, sales partners and all other B2B partners that do business with the SUNOTEC Holding companies. The business partners are required to contractually pass on all requirements to those business partners and suppliers that affect the contractual relationship with the SUNOTEC Holding companies.

## Social standards

SUNOTEC strongly believes that all workers in our supply chain deserve fair, ethical and safe labour conditions. Our suppliers must support and respect internationally recognised human rights as outlined by the UN Declaration of Human Rights and related conventions and ensure that their suppliers follow the same standards. We expect our suppliers to ensure compliance with labour standards of the International Labor Organization (ILO).

**Prohibition of child labour**

Suppliers must strictly prohibit child labour at any stage of operation and adhere to the minimum age requirements dictated by national laws and ILO conventions. Workers under the age of 18 must not be engaged in any hazardous activities that could jeopardise their health, safety, or development. Robust age verification measures must be implemented to prevent the employment of individuals below the legal minimum age. If child labour is identified, suppliers are obligated to enact remediation steps prioritizing the child's welfare.

**Prohibition of forced or compulsory labour**

Suppliers must ensure that all work is conducted voluntarily and free from coercion, threats, or any form of forced labour, including modern slavery and human trafficking. Employment relationships must be voluntary, with workers free to leave after reasonable notice. Suppliers are prohibited from holding money or essential documents, such as passports, to restrict employees' freedom. Robust measures should be implemented to eliminate all forms of forced and compulsory labour.

**Equal opportunities and non-discrimination**

Suppliers must foster a working environment rooted in equality, diversity, and respect, where discrimination and harassment are strictly prohibited. Employees and other individuals must not face any direct or indirect discrimination based on attributes such as nationality, ethnicity, race, gender, age, sexual orientation, religion, disability, or political beliefs. Unequal treatment or unwarranted disadvantage must not be tolerated, and fair treatment and equal opportunity must be ensured for all, respecting each individual's dignity and promoting their ability to contribute to the organisation's success.

**Freedom of association and right to collective bargaining**

Suppliers must uphold the right of employees to freely associate, form or join trade unions, and engage in collective bargaining without fear of discrimination or retaliation. This right must be respected in all circumstances, including in countries where national laws may limit these freedoms. Employee representatives must be able to communicate openly with management to discuss labour conditions, and suppliers are obligated to negotiate in good faith. Additionally, suppliers must ensure that these rights are extended to employees working through sub-providers.

**Working hours and remuneration**

Suppliers must ensure that working hours, including overtime, comply with applicable laws and ILO conventions. Wages should meet or exceed the legal minimum wage applicable in the country of employment, covering basic needs for employees and their families. In the absence of statutory minimum wage, industry-specific standards apply. Fair remuneration also involves paying equal wages for equal work, free from

discrimination. Suppliers must provide clear wage statements and ensure rest periods and days off align with legal and industry standards.

### **Health and safety**

Suppliers are required to provide a safe and healthy working environment, adhering to applicable health and safety laws and international standards, including ILO conventions. Measures should be in place to prevent workplace injuries and health hazards, with a commitment to continuous improvement in safety practices. Suppliers must regularly assess risks, implement protective measures, and provide mandatory health and safety training. All health and safety protocols should be accessible and understandable for employees, with no cost burden placed on them.

### **Grievance mechanism**

Suppliers must establish or participate in an effective grievance mechanism that allows employees and other affected parties to confidentially and anonymously report concerns related to business ethics, human rights, or environmental issues. The mechanism should ensure that such reports are handled confidentially and protect whistleblowers from any form of retaliation.

### **Responsible sourcing and due diligence for conflict minerals**

Suppliers must exercise special care when sourcing raw materials from conflict-affected and high-risk areas, adhering to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals. They are expected to implement robust due diligence processes in line with the UN Guiding Principles on Business and Human Rights to regularly assess and mitigate risks related to human rights violations and environmental harm. Suppliers should trace the origins of these materials and provide a supply chain traceability protocol, for example in accordance with the SEIA's Solar Supply Chain Traceability Protocol or the Solar Stewardship Initiative.

### **Environmental standards**

SUNOTEC is committed to promoting sustainable and responsible environmental practices throughout our supply chain. We believe that preserving the environment is essential for the well-being of our planet and future generations. Our suppliers must adhere to internationally recognised environmental standards, as outlined by the relevant UN and OECD guidelines, and actively seek to minimise their ecological impact.

### **Climate protection**

Suppliers are encouraged to implement robust environmental management systems, such as EMAS or ISO 14001, to systematically reduce greenhouse gas emissions and improve energy efficiency. They should set clear targets for minimising environmental impact, including emissions across Scopes 1, 2, and 3, and actively work to reduce air, soil, and water pollutants. The use of renewable energy and climate-friendly processes is

highly encouraged. Suppliers must be able to provide data on product emissions and energy usage and should collaborate to share information on new climate-friendly products and services.

### **Sustainable resource use**

Suppliers must strive to enhance resource efficiency and minimise environmental impacts by prioritising the use of recyclable and reusable materials. Efforts to reduce waste through recycling and adopting resource-saving technologies are essential. Suppliers are encouraged to embrace a circular economy approach, focusing on the lifecycle of materials and promoting reuse and recycling.

### **Handling of hazardous substances**

Suppliers must adhere to international conventions such as the Minamata Convention on Mercury and the Stockholm Convention on Persistent Organic Pollutants (POPs) to manage hazardous substances responsibly. They must avoid using harmful substances and ensure safe procurement, storage, usage, and disposal of chemicals while regularly instructing employees on safety measures. Suppliers should aim to replace hazardous materials with less harmful alternatives where possible.

Additionally, compliance with the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal is required, ensuring all waste management practices are environmentally sound and legally compliant.

## **Governance standards**

### **Fair competition and antitrust**

Suppliers must apply ethical business practices that comply with antitrust and competition national and international legislation in the markets where they operate. These laws are designated to uphold free and open competition in the marketplace. Our suppliers shall not be engaged in discussion, collude or agreement with third parties to:

- Fix or control prices, terms and conditions
- Share or receive confidential information with/from current or potential competitors of any other unauthorized parties
- Choose not to submit a bid, withdraw a bid or submit an artificial bid to influence the outcome of a bidding process

### **Anti-bribery and anti-corruption**

Suppliers must reject and prevent all forms of corruption and must not offer, request, give or accept bribes, gifts, hospitality, facilitation payments or other improper advantages for business or private gain. Suppliers shall exercise increased caution when business courtesies involve public officials.

**Conflicts of interest**

Suppliers shall conduct all business activities and decisions based on objective criteria, ensuring transparency and integrity. They must avoid conflicts of interest that may arise from private or other economic activities and promptly disclose any potential or apparent conflicts to SUNOTEC. Suppliers are expected to eliminate such conflicts immediately after identification.

**Anti-money laundering**

Suppliers must ensure compliance with the applicable legal obligations against money laundering within their business operations and must not participate directly or indirectly in money laundering activities.

**Data protection and confidentiality**

Suppliers shall protect and maintain the confidentiality of all information obtained during their business activities with SUNOTEC. This includes safeguarding company secrets, trade and personal data, and other confidential information against unauthorized access or misuse. Suppliers must implement appropriate technical and organizational measures to ensure compliance with national and international data protection laws. Personal data shall be processed confidentially and responsibly, ensuring it is effectively protected and used only for legitimate purposes.

| <b>Date of last update</b> | <b>Summary of changes</b> | <b>Changes made by</b> |
|----------------------------|---------------------------|------------------------|
| 26.07.2024                 | Policy Created            |                        |
| 04.09.2025                 | Policy Updated            |                        |