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## Code of Conduct HIS Renewables GmbH

### 1. Preamble; Objectives and Scope of Application

As an internationally active family business with a long tradition, HIS Renewables GmbH enjoys an excellent reputation worldwide. This Code of Conduct, which we see as an integral part of our responsible corporate governance, describes the framework within which we operate. This Code of Conduct applies to all contractual partners and employees of HIS Renewables GmbH. It defines the principles to which HIS Renewables GmbH and its contractual partners and employees are subject. The Code of Conduct is based on national laws and regulations such as the German Supply Chain Obligations Act (LkSG) as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights and the International Labour Standards of the International Labour Organization.

For future cooperation, the contractual partners agree on the validity of the following regulations for a joint code of conduct. This agreement shall be the basis for all future deliveries. The contractual partners undertake to comply with the principles and requirements of the Code of Conduct and to endeavour to contractually oblige their subcontractors to comply with the standards and regulations listed in this document. This agreement shall enter into force upon signature. A breach of this Code of Conduct may ultimately be grounds and cause for the company to terminate the business relationship, including all associated supply contracts.

## 2. Requirements

### 2.1. Social responsibility

#### Elimination of forced labour

No forced labour, slave labour or work of a similar nature shall be used. All work must be voluntary and without threat of punishment. Workers must be able to leave work or employment at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation. The hiring or use of security guards must not take place if, in the course of their work, persons are treated inhumanely or in a degrading manner or are injured or if freedom of association is impaired.

#### Prohibition of child labour

Child labour must not be used in any phase of production. Suppliers are required to comply with the recommendation of the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be less than the age at which compulsory schooling ends according to the law of the place of employment and in any case not less than 15 years. If children are found at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers under the age of 18 shall not be used for work harmful to the health, safety or morals of children. Special protection rules shall be observed.

#### Fair wages

The remuneration for regular hours and overtime must be equal to the national statutory minimum wage or the industry minimum standards, whichever is higher. The remuneration for overtime must in any case exceed the remuneration for regular hours. If the remuneration is not sufficient to cover the costs of ordinary living expenses and to build up a minimum level of reserves, the supplier shall be obliged to increase the remuneration accordingly. The employees shall be granted all benefits prescribed by law. Wage deductions as punitive measures are not permitted. The supplier shall ensure that the employees receive clear, detailed and regular written information on the composition of their remuneration.

#### Freedom of association

The right of workers to form and join organizations of their choice and to bargain collectively and to strike shall be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of workers for the purpose of collective bargaining shall be provided.

Workers shall not be discriminated against on the grounds of formation, affiliation or membership of such an organization. Workers' representatives shall be granted free access to the workplaces of their colleagues in order to ensure that they can exercise their rights in a lawful and peaceful manner.

## **Prohibition of discrimination**

The unequal treatment of employees in any form is inadmissible unless it is justified by the requirements of the employment. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin color, disability, health status, political conviction, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

## **Health protection; occupational safety**

The supplier is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the activity. Appropriate measures shall be taken to prevent excessive physical or mental fatigue. In addition, employees are regularly informed and trained about applicable health and safety standards and safety measures. Employees shall be provided with access to drinking water in sufficient quantity and access to clean sanitary facilities.

## **Preservation of the natural basis of life**

The supplier shall not, in violation of legitimate rights, deprive people of land, forests or waters whose use secures their livelihood. The supplier shall refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this damages the health of persons, significantly impairs the natural basis for the production of food or prevents the access of persons to safe drinking water or sanitary facilities.

## **Grievance mechanisms**

A grievance management system for accessibility, responsibility and the implementation of a grievance procedure in an appropriate manner shall be established. The grievance procedure shall be accessible to employees while maintaining confidentiality of identity and effective protection against discrimination. In the absence of a notice, the supplier is responsible for establishing an effective grievance mechanism at the facility level for individuals and communities who may be affected by adverse impacts.

## Dealing with conflict minerals

The extraction of certain raw materials in the Democratic Republic of Congo (DRC) and neighboring countries contributes in part to significant human rights violations and the financing of violent conflicts in this region. In 2010, the United States Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act). Section 1502 of the

Dodd-Frank Act and the implementing regulations of the U.S. Securities and Exchange Commission (SEC) require companies subject to SEC oversight to report whether the products they produce or have contracted to produce contain "conflict minerals" that are "necessary to the functionality or production" of those products. The Dodd-Frank Act defines tantalum, tin, tungsten (and the ores from which they are extracted) and gold as "conflict minerals" that finance conflicts in the DRC or an adjoining state.

HIS Renewables GmbH is not required by law to comply with the U.S. SEC's requirements published in 2012 to file a conflict minerals report.

HIS Renewables GmbH is aware of its social responsibility with regard to the environment, safety and health and the observance of human rights. In our business dealings, we are committed to the peaceful and sustainable use of our global resources. We do not directly import conflict materials, nor do we currently have any indications that the products we process could contain minerals originating from these conflict regions.

## 2.2. Environmental responsibility

### Treatment and discharge of industrial wastewater

Wastewater from operations, manufacturing processes and sanitary facilities should be typed, monitored, inspected and treated as necessary prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

### Dealing with air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be typed, routinely monitored, verified and treated as necessary prior to their release. The supplier is also responsible for monitoring its exhaust gas cleaning systems and is required to find economic solutions to minimize any emissions.

## Dealing with waste and hazardous substances

The supplier shall follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989, as amended, shall be respected. Chemicals or other materials that pose a risk if released into the environment shall be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse and disposal. Mercury shall be used in accordance with the prohibitions of the Minimata Convention of 10 October 2013 and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001, as amended.

## Reducing consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided. This is done either directly at the point of production or through processes and measures, for example by changing production and maintenance processes or procedures in the company, by using alternative materials, through savings, through recycling or with the help of the reuse of materials.

## Dealing with energy consumption and efficiency

Energy consumption must be monitored and documented. Economic solutions must be found to improve energy efficiency and minimize energy consumption.

## 2.3. Ethical business conduct and compliance

### Fair competition

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions in dealings with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their prices and other conditions autonomously when reselling.

### Privacy/data protection

The supplier undertakes to meet the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. The Supplier shall observe the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting and forwarding personal information.

## Intellectual property

Intellectual property rights shall be respected; technology and know-how transfer shall be carried out in a way that protects intellectual property rights and customer information.

## Integrity/corruption, personal gains

The highest standards of integrity shall be applied in all business activities. The supplier shall have a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be in place to ensure compliance with anti-corruption laws.

## Anti-corruption

HIS is convinced of the quality of its products and the performance of its contractual partners and employees. The HIS company firmly rejects the direct or indirect bribery of business partners, including public officials. Employees are prohibited from demanding, being promised or accepting benefits in return for the purchase of products or other services. HIS contractual partners undertake neither to make use of these means themselves nor to promote transactions that make use of these means.

## Compliance with the principles for international trade

HIS complies with all national, multinational and supranational foreign trade regulations. HIS Renewables GmbH's contractual partners are obliged to comply in particular with the applicable export and import bans, official approval reservations and the applicable customs and tax regulations.

HIS attaches particular importance to compliance with national and international regulations to prevent money laundering.

## 3. Implementation of requirements

We expect our suppliers to identify risks within supply chains and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier will inform the company promptly and, if necessary, regularly about the identified violations and risks as well as the measures taken. The company checks compliance with the standards and regulations listed in this document with the help of a self-assessment questionnaire and risk-based audits at the supplier's production sites. The Supplier agrees that the Company may conduct such audits once a year or on specific occasions to verify compliance with the Code at the Supplier's production sites during normal business hours after reasonable advance notice by persons appointed by the Supplier. The Supplier may object to individual audit measures if these would violate mandatory data protection regulations. If a

violation of the regulations of this Code of Conduct is determined, the company will immediately inform the supplier in writing and set an appropriate grace period for the supplier to bring its behavior into line with these regulations. If a remedy is not possible in the foreseeable future, the supplier shall immediately notify the company and, together with the company, draw up a concept with a timetable for ending or minimizing the violation. If the grace period expires fruitlessly or if the implementation of the measures contained in the concept does not bring about a remedy after the expiry of the time schedule and no more lenient means are available, the company may terminate the business relationship and terminate all contracts. A statutory right to extraordinary termination without granting a grace period, in particular in the case of violations that are to be considered very serious, remains unaffected, as does the right to compensation for damages.

#### 4. Supplier acknowledgement and consent

By signing this document, the supplier undertakes to act responsibly and to comply with the principles/requirements listed. The supplier undertakes to communicate the contents of this code to employees, agents and subcontractors in a manner that is comprehensible to them and to take all necessary precautions for the implementation of the requirements.

#### 5. Privacy

The personal rights of employees and business partners must be respected. HIS collects, processes and uses personal data of its employees and business partners only in accordance with the relevant data protection regulations, insofar as this is necessary for the handling of the operational processes of HIS. Personal data is stored securely and adequately protected against unauthorized access. HIS expects its contractual partners to comply with the applicable data protection regulations.

Güven Altun

Management