

Supplier Code of Conduct

ENGLISH



v1.0



ENSTALL

BUILDING SUSTAINABLE RELATIONSHIPS WITH OUR SUPPLIERS

Enstall¹ is an innovative developer of mounting solutions for solar panels. The transition to clean energy lies at the core of our business. We continuously strive to combine economic success, social responsibility, and environmental protection in our business operations, thereby enabling our customers to meet the current and future needs of society. Ensuring the principles of sustainable development in our supply chains is important to us, as we are committed to creating long-term and durable relationships with our partners in the supply chain to minimize waste, practice circularity in the use of materials, and power all steps of the supply chain with renewable energy sources.

The Supplier Code of Conduct (this “Code”) sets out minimum requirements for our direct suppliers and any selected sub-suppliers (jointly, “Suppliers” or “you”). We want to partner with our Suppliers to further develop their sustainability performance in our supply chain. We expect our Suppliers to not only comply with environmental, social, and governance clauses in their contracts with **Enstall**, but to also comply with applicable laws and regulations fully and to adhere to internationally recognized

environmental, social, and corporate governance standards (“**Enstall** standards”) as set out below, which reflect our commitment to the United Nations Global Compact (UNGC) and our respect for universally recognized normative standards such as the United Nations Universal Declaration of Human Rights, ISO standards on health, safety, and environment, and the core labor conventions of the International Labour Organisation (ILO).

By adhering to this Code, you undertake to support, implement, and enact the **Enstall** standards in accordance with your contractual commitments and to comply with applicable laws and regulations. You also undertake to use your best efforts to implement the **Enstall** standards of this Code or similar internationally recognized standards with your employees and business partners, including suppliers, contractors, and joint venture partners, in line with our General Terms and Conditions of Purchase. Adhering to this Supplier Code of Conduct forms an integral part of our approval process to onboard a new Supplier on the **Enstall** Approved Supplier List.

1. In this Code the reference to “Enstall” refers to Enstall Group B.V. and/or each of its subsidiaries around the globe that are majority controlled or owned, directly or indirectly, by Enstall Group B.V.

ENVIRONMENT

Suppliers will have a systematic approach to managing issues related to safety, health, security, and environment that is designed to ensure legal compliance and to achieve continuous performance improvement. In particular:

1. You comply with all applicable environmental, health, and safety regulations. You promptly report unsafe or unhealthy conditions and take steps to correct those conditions immediately.
2. You undertake to implement an appropriate environmental management system to identify, assess, prevent, and reduce the negative environmental impacts of your activities and products.
3. You promote the safe and environmentally sound development, manufacturing, transport, use, and disposal of raw materials, products, and wastes.
4. You protect your employees' and neighbors' life and health, as well as the general public at large, against hazards inherent in your processes and products.
5. You minimize your negative impact on biodiversity, climate change, and water scarcity.
6. You use resources efficiently, apply energy-efficient and environmentally friendly technologies and reduce waste, as well as emissions to air, water, and soil.
7. You help others you work with to understand their environmental responsibilities.
8. You will strive for continuous improvement of all your environmental performance.
9. You are encouraged by **Enstall** to take measures to reduce the greenhouse gas emissions generated by your operations, products, and services.
10. You are encouraged by **Enstall** to incorporate climate change risk assessment into your risk management procedures and publicly report on your climate change risk and environmental performance.

HUMAN RIGHTS

Suppliers will respect the human, cultural, and legal rights of all individuals and communities and promote the goals and principles of the United Nations Declaration on Human Rights. This commitment will extend to the fair treatment and meaningful involvement of all people, including indigenous people, regardless of race, color, sex, national origin, or any other status protected by law.

Enstall expects its Suppliers to likewise respect human rights and remediate human rights impacts in their respective activities. Suppliers are encouraged to do so by identifying risks, monitoring risks, and reporting and remediating any violations that relate to the following:

- 1. Anti-slavery and human trafficking:** prohibit human trafficking in the performance of a contract.
- 2. Child labor:** prohibit the use of child labor.
- 3. Forced or coerced labor:** prohibit the use or support of human trafficking, slave labor, or prison labor in your labor force (including, but not limited to, in compliance with the Uyghur Forced Labor Prevention Act), including extra precautions to respect the rights and well-being of migrant workers whose rights may be at risk or who may lack access to basic public services. You provide training on human trafficking and slavery, particularly with respect to risk mitigation, to employees who have direct responsibility for supply chain management.
- 4. Harassment and discrimination:** prohibit all forms of harassment and discrimination that create an intimidating, hostile, or offensive work environment while also respecting each employee's right to be treated with dignity, respect, and fairness.
- 5. Security:** meet the expectations of the Voluntary Principles on Security and Human Rights including the assurance that human rights are respected and complicity in human rights violations by public security forces, including the police or military, are avoided.

WORKING CONDITIONS

1. Compensation & Benefits

You undertake to promote employees' material well-being by providing competitive wages, benefits, and work hours in accordance with legal requirements, including compliance with minimum wages and working hours in accordance with local laws, and ensure compensation of a living wage according to local living conditions. Additionally, you adhere to relevant national laws, industry standards, and international standards for paid sick leave, paid annual leave, and paid parental leave.

2. Diversity

Diversity of people and ideas provides a business advantage. Diverse companies compete more successfully in today's world economy by generating ideas that create value and success. **Enstall** supports the economic inclusion of diverse suppliers, including local suppliers and businesses owned and operated by people who are minorities, women, veterans,

physically challenged, and/or disadvantaged. You undertake to promote diversity within the workforce and to value and respect the unique character and contribution of each employee.

3. Social dialogue:

You recognize and respect employees' right to associate freely, bargain collectively, and provide an opportunity to be heard on labor rights and other issues.

4. Occupational health and safety

You provide and maintain a safe and healthy work environment that meets or exceeds applicable legal standards, including the right to sufficient, safe, acceptable, and accessible water. You ensure the protection of your workforce by providing basic personal protective equipment appropriate to the nature of work and relevant training in health and safety systems.

PRODUCTS AND PRODUCT INFORMATION

1. Conflict Minerals:

You will comply with applicable laws and regulations regarding "conflict materials" including tin, tungsten, tantalum, and gold. You will promptly provide transparency concerning

your raw material sources to **Enstall** upon request. In addition, you will implement a management system to ensure that "conflict materials" included in the products you manufacture or supply do not finance or benefit, directly or indirectly, armed groups that commit serious human rights violations.

2. Health, safety and environmental risks related to the products

You exercise quality and sustainability due diligence when designing, manufacturing, and testing products, and include environmental, health and safety criteria into the purchase of products and services. You undertake to inform **Enstall** of the presence in the products supplied of hazardous chemical substances that may be released during the lifecycle of the products, and not to supply **Enstall** with any product likely to contain substances prohibited by the laws applicable in the country or countries of destination of the product.

3. Fight against planned obsolescence

You undertake to promote eco-design practices and to fight against techniques that deliberately reduce the lifespan of a product in order to increase its replacement rate.

ETHICS AND COMPLIANCE

1. Conflicts of interest

Situations likely to present a risk of real or apparent interference between the personal interest of an employee or his or her close relatives and the interests of **Enstall** are to be avoided. You undertake to inform **Enstall** of any situation where there could be a real or potential conflict of interest with **Enstall's** employees or their close relationships. The person informed must be your contact person within **Enstall**.

2. Corruption

You operate your business with integrity and impartiality, and in accordance with applicable anti-corruption laws and regulations. Any form of corruption in the conduct of business will be rejected. In particular, the negotiation and performance of contracts must not give rise to conducts or acts that may be qualified as corruption, trading in influence, or similar and equivalent offences, within the meaning of applicable laws and regulations.

3. Gifts and travel

You forbid gifts to private or public officials that aim to influence business decisions or otherwise encourage them to act contrary to their obligations. Although local and industry customs about gifts and entertainment vary,

Suppliers shall in no event offer any business courtesy to **Enstall** employees if doing so will obligate, appear to obligate, or is intended to obligate or unduly influence the employee's behavior or decision making.

4. Duty of care

You undertake to select suppliers, service providers, contractors and subcontractors who meet the same level of requirements regarding respect for ethics, human rights, fundamental freedoms, the health and safety of persons and the environment in all countries where they operate.

5. Competition and antitrust

You undertake to conduct your activities in compliance with the applicable competition and antitrust laws and regulations, and to promote and preserve healthy and effective competition within your environment. In particular, you undertake neither to solicit nor to transfer any information if that would constitute an infringement of competition law.

6. Protection of information & personal data

You commit to a responsible and reasonable use of information and ensure the proper handling of sensitive information, including confidential, proprietary information and personal data. The information may not be



used for purposes other than those for which it was provided. You will protect any confidential or proprietary information, including personal data, against unauthorized access, destruction, misuse, alteration, and disclosure, by means of appropriate physical and electronic security procedures. In the event of a cyber attack, you will immediately notify **Enstall**. You will comply with applicable data protection and privacy legislation.

7. Trade controls: exports and imports

You undertake to implement commercial practices that comply with laws and regulations applicable to exports and imports. You undertake to provide all information relating to goods and services supplied, notably in view of obtaining export or import licenses or agreements, where applicable.

8. Insider trading

You and your employees will comply with applicable legislation on insider trading.

9. Whistleblowing

Enstall encourages you to implement a clear process allowing your employees, suppliers, service providers, contractors, subcontractors and any other person, to voice questions or concerns, particularly in terms of ethics, without fear or retaliation.

EVALUATION OF SUPPLIERS

You undertake to join forces with **Enstall** to apply these **Enstall** Standards as effectively as possible. Suppliers will allow **Enstall** to perform validation exercises that can include third party audit rights to assess or audit compliance with these **Enstall** standards. **Enstall** will take appropriate steps regarding our relationship with you if there is a reason for concern.

Enstall reserves the right to discontinue any relationship for non-adherence to international principles, failure to correct violations, or displaying patterns of non-compliance with these **Enstall** standards. You will immediately inform **Enstall** when you are unable to comply with certain **Enstall** standards, to allow parties to jointly agree on the implementation of corrective measures.

SPEAK UP

If you observe or suspect any misconduct which may result in a violation or potential violation of this Code, we encourage you to speak up to allow **Enstall** to deal with the situation proactively. Our Speak Up Policy, [accessible here](#), describes how and where you can speak up about suspected misconduct without fear of retaliation. Furthermore, it describes what you may expect from **Enstall** when you speak up, and what possible steps will be taken after you raise a concern.

REFERENCES

UNITED NATIONS GLOBAL COMPACT

www.unglobalcompact.org

THE UNIVERSAL DECLARATION OF HUMAN RIGHTS

www.un.org/en/universal-declaration-human-rights

ISO STANDARDS

www.iso.org/standards.html

INTERNATIONAL LABOUR STANDARDS OF THE INTERNATIONAL LABOUR ORGANIZATION (ILO)

www.ilo.org

UNITED NATIONS UNIVERSAL DECLARATION ON HUMAN RIGHTS

www.un.org/en/about-us/universal-declaration-of-human-rights

UYGHUR FORCED LABOR PREVENTION ACT

www.congress.gov/bill/117th-congress/house-bill/1155/text

VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS

www.voluntaryprinciples.org

