



## Heliene Supplier Code of Conduct

Heliene Inc. and Heliene USA Inc. (hereinafter **Heliene**) are committed to ensuring that the fundamental human rights of workers are protected, including addressing the potential risks of forced labor, child labor, servitude, human trafficking, and slavery across our supply chain. We engage with suppliers that are committed to these same principles, and we set exacting standards for suppliers of goods and services for Heliene.

Our requirements and expectations for suppliers are detailed below in our Supplier Code of Conduct (“**Supplier Code**”). Suppliers must comply with all applicable laws and this Supplier Code, even when this Supplier Code exceeds the requirements of applicable law. Heliene expects all products or services provided to Heliene to be designed, manufactured, and delivered in accordance with this Supplier Code.

These standards are derived from the United Nations Guiding Principles on Business and Human Rights, the Core Conventions of the International Labour Organization (“ILO”), including the ILO Declaration on Fundamental Principles and Rights at Work, the Solar Energy Industries Association Solar Industry Commitment to Environmental & Social Responsibility, and the Responsible Business Alliance Code of Conduct.

In our application of these standards, we follow these key principles:

- 1. Inclusivity:** Our standards apply to all workers regardless of race, color, national origin, gender, gender identity, sexual orientation, religion, disability, age, political opinion, pregnancy, migrant status, ethnicity, caste, marital or family status, or similar personal characteristics.
- 2. Continuous improvement:** Heliene operates a policy of continuous improvement, and we are committed to working with our suppliers to improve protections for their workers and workplace.
- 3. Supply chain accountability and traceability:** To ensure these standards are cascaded throughout our supply chain, we expect suppliers to consistently monitor and enforce these standards in their own operations and supply chain, as well as make improvements to meet or exceed our expectations and those of our customers as reflected in our Supplier Code. Suppliers are required to disclose any subcontractors or labor agents upon request. They are also expected to hold their subcontractors, and labor agents to the standards and practices covered by our Supplier Code. Suppliers with subcontracted production are required to work with their subcontractors to adopt and raise awareness of this Supplier Code. Suppliers shall devise and implement a remediation plan to address any deficiencies and immediately alert Heliene of any non-conformance to these requirements. Suppliers are also expected to comply with the latest Solar

Supply Chain Traceability Protocol as published and amended from time to time by the Solar Energy Industries Association (SEIA).

## **Labor Rights**

### **1. Freely Chosen Employment**

Suppliers shall not use or otherwise benefit from forced or compulsory labor. Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities including, if applicable, workers' dormitories or living quarters. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

### **2. Young Workers**

Suppliers will comply with the ILO's Minimum Age Convention, the ILO's Worst Forms of Child Labour Convention, and all other applicable laws, rules, and regulations regarding child labor. Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation is provided.

### **3. Working Hours**

Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.

#### **4. Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

#### **5. Humane Treatment**

There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

#### **6. Non-Discrimination/Non-Harassment**

Suppliers should be committed to a workplace free of harassment and unlawful discrimination. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way or otherwise in violation of applicable law. This was drafted in consideration of ILO Discrimination (Employment and Occupation) Convention (No.111).

#### **7. Freedom of Association**

In conformance with local law, Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

#### **8. Restricted Jurisdictions or Entities**

Supplier shall not transact with:

- (i) entities in the Xinjiang Uyghur Autonomous Regions of China (XUAR) that produce goods using forced labor;
- (ii) entities that work with the Xinjiang government to recruit, transport, transfer, harbor, or receive forced labor or Uyghurs, Kazakhs, Kyrgyz or members of other persecuted groups out of Xinjiang;
- (iii) products made by entities in lists (i) and (ii);

- (iv) entities that export products identified in (iii) from the PRC to the United States or Canada;
- (v) entities and facilities that source material from Xinjiang or from persons working with the Xinjiang government or the Xinjiang Production and Construction Corps (XPCC) for purposes of any government-labor scheme that uses forced labor; and
- (vi) listed entities on the UFLPA Entity List (available at <https://www.dhs.gov/uflpa-entity-list>).

## **Health and Safety**

### **1. Health and Safety**

Suppliers are required to provide workers with a safe and healthy work environment. Suppliers must, at a minimum, comply with applicable laws regarding working conditions and with the standards in Heliene's Supplier Code.

### **2. Occupational Safety**

Suppliers are required to monitor workers' potential for exposure to safety hazards (e.g., chemical, mechanical, electrical and other energy sources, fire, vehicles, and fall hazards) and identify, assess, and control these hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training.

### **Occupational Injury and Illness:**

Suppliers are required to put procedures and systems in place to prevent, manage, and track occupational injury and illnesses, such as encouraging worker reporting, classifying and recording injury and illness cases, providing necessary medical treatment, investigating cases, and implementing corrective actions to eliminate their causes.

### **Industrial Hygiene:**

We encourage suppliers to identify, evaluate, and control worker exposure to chemical, biological, and physical agents. This includes eliminating or controlling potential hazards through proper design, engineering, and administrative controls. Workers must be informed and receive appropriate education in advance if they will be working with (or otherwise exposed to) hazardous or dangerous conditions or materials. In addition, workers must be given appropriate personal protective equipment and educated and trained on the proper use of such equipment.

### **3. Physically Demanding Work**

Suppliers are required to continually identify, evaluate, and control physically demanding tasks to ensure that worker health and safety is not jeopardized.

### **4. Emergency Preparedness and Response.**

Suppliers are required to identify and plan for emergency situations and implement and train their workers on response systems, including emergency reporting, alarm systems, worker notification and evacuation procedures, worker training and drills, first-aid supplies, fire detection and suppression equipment, and unblocked exit facilities.

## **5. Machine Safeguarding**

Suppliers are required to implement a regular machinery maintenance program. Production and other machinery must be routinely evaluated for safety hazards. Where appropriate, suppliers are required to provide properly maintained machinery controls (e.g., physical guards, interlocks, barriers) when machinery presents an injury hazard to workers.

## **Environment**

### **1. Environment**

Suppliers are required to comply with applicable environmental laws; we encourage our suppliers to look for opportunities to go beyond regulatory compliance obligations and make progress towards integrating sustainable practices throughout their operations. We encourage our suppliers to look for ways to minimize the impact on the environment (including the use of energy, air emissions, greenhouse gas emissions, waste, water, pollution, hazardous materials, and recycling) through their entire operations.

### **2. Energy Consumption and Greenhouse Gas Emissions**

We encourage suppliers to look for ways to improve energy efficiency, minimize energy consumption, and mitigate greenhouse gas emissions.

### **3. Environmental Permits and Recordkeeping**

Suppliers are required to obtain and keep current all required environmental permits, approvals, and registrations and follow applicable operational and reporting requirements.

### **4. Effective Management and Disposal of Hazardous Substances**

Suppliers are required to effectively identify and manage the safe handling, movement, storage, and disposal of chemicals and substances that pose a threat to the environment, including providing workers with appropriate training on the safe-handling and disposal of hazardous substances. Suppliers are also required to monitor and control wastewater or solid waste generated from operations before disposing in accordance with applicable laws and the Supplier Code.

## **Ethical Behavior**

### **1. No Bribery**

Our suppliers must not engage in bribery with anyone for any reason, whether dealings with government officials or the private sector.

### **2. Anti-Corruption**

Suppliers are required to comply with applicable anti-corruption laws, including the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act, and never bribe a government official on Heliene's behalf.

### **3. Grievance Mechanism and Whistleblower Protections**

Heliene expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner

and maintain an effective process to Supplier Code. Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor.

#### **4. Transparency**

Suppliers must keep and maintain complete and accurate records about working conditions (e.g., wage and working hour records). Information regarding suppliers' labor, health and safety, environmental practices, where necessary to demonstrate suppliers' compliance with requirements of this Supplier Code must be disclosed in accordance with applicable regulations and upon Heliene's request.

### **Management Systems**

#### **1. Management Systems**

Heliene expects that suppliers adopt a management system to drive continuous improvement and ensure compliance with applicable laws and this Supplier Code.

#### **2. Management Accountability and Responsibility**

Heliene expects that our suppliers have designated representatives responsible for implementing management systems and programs that oversee compliance with applicable laws as well as this Supplier Code. Senior management must routinely review and assess the quality and efficiency of the management systems and programs.

#### **3. Risk Management**

Heliene expects our suppliers to establish a process to identify the environmental, health, safety, and ethical risks associated with their operational and labor practices. In addition, management must develop appropriate processes to control identified risks and ensure regulatory compliance. Suppliers are required to consistently monitor and enforce these standards in their own operations, supply chain, and subcontractors, and should make improvements to meet or exceed our expectations and those of our customers as reflected in our Supplier Code.

#### **4. Training**

Heliene expects our suppliers to maintain appropriate training programs for managers and workers to implement standards consistent with our Supplier Code and to comply with applicable legal requirements.

#### **5. Documentation and Records**

Suppliers are required to create, retain, and dispose of business records in full compliance with applicable legal requirements along with appropriate confidentiality to protect privacy. All facilities must maintain a valid business license; suppliers are responsible for reviewing and complying with all legal requirements, and have available required permits, licenses (e.g., health and safety permits, occupancy permits, etc.) necessary to operate their facilities.