

Business Partner Code of Conduct of SOLARWATT Group

Our commitment to our responsibilities

SOLARWATT not only aspires to be a pioneer in terms of our products and services, but also to excel in sustainability, integrity, trust and appreciation in our dealings with each other and with our business partners, customers, suppliers and service providers. Our claim is to create resilient conditions for long-term successful partnerships that ensure sustainable success.

- SOLARWATT is committed to fulfilling its social responsibility in all corporate activities and expects the same from its business partners. In the operation of our company, in addition to procedural, economic and technical criteria, we also consider social and ecological aspects such as human rights, working conditions, prevention of corruption and environmental protection. The following regulations represent the minimum requirements that we expect our business partners to comply with.

- The SOLARWATT Business Partner Code of Conduct is an integral part of all contracts between SOLARWATT and our business partners as well as their upstream suppliers and their affiliated companies. In the event that a business partner fails to comply with an expectation of this Code of Conduct, we expect the business partner to take appropriate remedial action. SOLARWATT reserves the right to terminate its contracts with business partners who cannot demonstrate compliance with our Business Partner Code of Conduct.



Detlef Neuhaus
CEO



Sven Böhm
CFO



Dr. Armin Froitzheim
CTO

Responsibility in business transactions

Compliance with laws and regulations

SOLARWATT expects our business partners to fulfill their social responsibility in all business activities and to comply with the applicable laws and regulations as well as this Code of Conduct.

Avoidance of conflicts of interest

SOLARWATT places great importance on protecting the reputation of our company. Therefore, we must ensure that our relationships with third parties are impeccable and that we can make objective and loyal business decisions for SOLARWATT. We therefore expect our business partners to make business decisions in the context of their cooperation with SOLARWATT exclusively on an objective basis. Conflicts of interest or the appearance of such are to be avoided by our business partners.

Anti-corruption

SOLARWATT does not accept or tolerate any form of direct or indirect bribery, corruption or other unjustified granting of advantages. We comply with applicable laws against corruption, including but not limited to extortion, fraud, bribery or graft. We expect our business partners to consistently reject any form of corruption, conduct detrimental to the company, and unfair business practices, to comply with applicable laws, and, to take reasonable precautions to prevent them, such as implementing company policies, training, and sanctioning violations.

Money Laundering Prevention

SOLARWATT expects our business partners to comply with their legal obligations to prevent money laundering and not to engage in any money laundering activities.

Import and export control regulations

SOLARWATT expects our business partners to follow existing trade controls and to comply with import and export control regulations and economic embargoes.

Fair competition

SOLARWATT is fully committed to fair competition and complies with applicable antitrust and competition laws. We also expect this from our business partners. Even the appearance of any anti-competitive behavior must be avoided.

Quality and safety of our products

The quality of our products and their safety for our customers and business partners are essential elements of our identity and the perception of SOLARWATT in the market. We expect our business partners to follow all quality control requirements relevant to their activities and to comply with the contractual provisions and specifications of SOLARWATT and our customers. Our business partners shall take care to establish and maintain effective methods and processes to prevent plagiarized parts from entering the supply chain circulation.

Conflict Minerals

SOLARWATT expects our business partners to comply with all applicable legal regulations regarding conflict minerals. If a product contains one or more of the so-called conflict minerals (tin, tantalum, tungsten, gold or the corresponding ores), SOLARWATT expects business partners to ensure transparency about their supply chain up to the smelter upon request.

Responsible supply chain

For SOLARWATT, constructive as well as trusting and respectful cooperation with our business partners as part of the supply chain is central. Therefore, we generally expect our business partners to comply with our "Business Partner Code of Conduct" and to pass on our standards within their supplier relationships as well as to demand and ensure compliance with them.

Responsibility in dealing with each other

Equal treatment and non-discrimination

SOLARWATT expects our business partners to promote equal opportunities and to respect the structures, customs and traditions of other cultures. Our business partners advocate equal rights and do not tolerate any form of disadvantage or discrimination based on nationality, ethnic origin, skin color, sexual identity, religion, ideology or disability, or based on gender or age. They do not tolerate any form of sexual harassment, coercion, bullying and verbal or even physical abuse. This also applies to any intimidating, hostile or offensive behavior.

Human and employee rights

SOLARWATT expects our business partners to respect generally ethical values and principles. The basic employee rights of the applicable national laws must be observed and the Universal Declaration of Human Rights of the United Nations must be recognized, taking into account the laws and regulations applicable in the various countries. We expect that the remuneration and other benefits provided by our business partners to their employees are at least in line with the respective national and local legal standards or the level of the national economic sectors/industries and regions.

Occupational health and safety

SOLARWATT expects our business partners to ensure occupational health and safety for their employees in the workplace in compliance with applicable laws and regulations and to establish an appropriate occupational health and safety management system. This includes, among other things, ensuring that regulations on building security and fire protection are complied with and that employees are provided with appropriate protective equipment where necessary.

- **Responsibility as a member of society**

- **Sustainable environmental, climate and species protection**

- Environmentally conscious actions and the careful treatment of natural resources are ethical and entrepreneurial obligations for SOLARWATT. SOLARWATT expects our business partners to contribute to the preservation of natural resources, biodiversity and the protection of the climate for future generations. SOLARWATT expects our business partners to observe all applicable laws and regulations for the protection of the environment within the scope of their business activities and to establish and maintain an appropriate environmental management system. They are obligated to comply with the protection of species. SOLARWATT expects them to contribute to the protection of the environment, the climate and the animal and plant world through their behavior and to implement a continuous improvement in efficiency in the sense of a conscious and careful use of resources as well as the minimization of environmental pollution and hazards.

- **Donations and sponsoring**

- SOLARWATT expects our business partners to be transparent in their donations and sponsoring activities. Sponsorship activities will not be used by them to gain unlawful business advantages. All donations are made voluntarily and no quid pro quo is expected. Unlawful corporate donations for political purposes or to party-affiliated or party-like organizations, elected officials or political candidates will not be tolerated by our business partners.

- **Communication and social media**

- Today, especially through social media, many can be reached worldwide within a short period of time. This increases our responsibility as a company but also that of each one of us. SOLARWATT expects responsible communication and use of social media from our business partners. Any statement about the cooperation that is harmful to the company must be refrained from and confidential company information must be protected.

- **Responsibility in handling third-party information and assets**

- **Information security and data protection**

- SOLARWATT expects our business partners to use electronic information systems in compliance with legal regulations and to use appropriate security precautions and security procedures (especially encryption and passwords). Personal data is treated confidentially and may only be collected, processed and used in accordance with the relevant data protection regulations.

Confidentiality

SOLARWATT expects our business partners to maintain secrecy about all company and business secrets of SOLARWATT that become known to them in the course of the cooperation and to use them exclusively in the course of the cooperation.

Protection of third party assets

SOLARWATT expects our business partners to respect the intellectual property of third parties as well as other property rights (e.g. copyrights).

Notices of violations and contact persons

- SOLARWATT offers our business partners the opportunity to report indications of compliance violations, including suspected corrupt practices, anti-competitive behavior or even money laundering to contact persons at SOLARWATT and to SOLARWATT's Risk- and-Compliance Officer at compliance@solarwatt.com . All tips will be treated confidentially and with appropriate care. SOLARWATT guarantees that honest whistleblowers will not suffer any disadvantages as a result of their report. Deliberate misuse of the reporting channels will not be tolerated.

- This offer is further extended by the possibility to report indications of possible violations of the law or violations of internal guidelines such as this CoC to the SOLARWATT Ombudsman's Office solarwatt@compliance-aid.com . All information will be treated confidentially. Further information can be found here.