



Svea Solar Supplier Code of Conduct

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1. Introduction

Svea Solar's ambition is to be a reliable and sustainable high-quality supplier to its customers, while maintaining a strong commitment to social and environmental responsibility.

The Supplier Code of Conduct ("Supplier Code") applies to all suppliers that deliver goods and/or services to Svea Solar, including any parent, subsidiary or affiliate entities as well as their respective employees and agents (hereinafter individually and collectively referred to as "Supplier"). For the purpose of this Supplier Code of Conduct, agents, intermediaries, contractors and consultants are also referred to as Suppliers.

This Supplier Code of Conduct is based on internationally recognised conventions such as United Nations Global Compact, United Nations Guiding Principles on Business and Human Rights, OECD Due Diligence Guidance for Responsible Business Conduct, and International Labour Organisations (ILO) Conventions. Svea Solar is committed to upholding the highest standards of ethical business and complying with all applicable laws, rules, and regulations. Svea Solar requires Suppliers to do the same.

If you have any questions about the content of this Supplier Code of Conduct, please reach out to the Head of Procurement at Svea Solar.

2. Implementation and compliance with the Supplier Code

Suppliers are expected to adhere to this Supplier Code. Svea Solar monitors compliance as described below in Section 12 (Monitoring and Enforcement). Suppliers must ensure that relevant employees and other workforce are aware about the content of this Supplier Code and are recommended and encouraged to implement equivalent requirements on their own suppliers.

The Supplier Code contains "Requirements" that Suppliers are expected to comply with and "Recommendations" that Suppliers are encouraged to comply with or implement. Additional Supplier specific requirements related to the areas in this Supplier Code may be defined in commercial agreements with specific Suppliers.

Svea Solar recognises that Suppliers may have their own Code of Conduct, work with another entity's Code of Conduct or be certified according to a sustainability scheme that is comparable to this Code. Svea Solar supports alternative approaches to implementing this Code of Conduct. Svea Solar reserves the right to decide whether such approaches are equivalent.

3. Legal compliance

Suppliers must stay up to date, and comply with, national and regional legislation as well as relevant and applicable international regulations and conventions related to all the areas in the Supplier Code.

Where the requirements in the Supplier Code are stricter than local laws, the requirements of the Supplier Code must be applied. In the event of actual or potential contradictions between the Supplier Code and applicable laws and regulations, Suppliers must notify Svea Solar.

4. Human rights

Requirements

- Suppliers shall support and respect the protection of internationally proclaimed human rights. For further reference, see Svea Solar's Human Rights Policy.
- Be aware of and address any actual or potential negative human rights impacts that they cause or contribute to, or that is directly linked to their operations, products or services.
- No allowance or tolerance for any form of modern slavery, including forced labour and human trafficking, in own operations or through value chain. Suppliers shall ensure that the work relationship between its employees and the Supplier is based on free and voluntary choice, without any form of coercion or threats.
- Prevent all forms of child labour and respect children's right to personal development and education. The minimum working age is 15 years or the legally prescribed minimum work age, if higher. Work opportunities for young workers (15-18 years old) shall be consistent with ILO Minimum Age Convention No. 138. Suppliers may employ young workers provided that they do not perform work likely to jeopardize their health, safety, or morals.
- Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

5. Labour standards

Requirements

- Ensure that all employees and individuals working under the control of Supplier are offered a safe and healthy workplace. See specifically section 6, Health & Safety, below.
- Workers sign an individual written employment contract or an equivalent agreement, in a language they understand, before they start work or introductory training, whichever comes first. Workers will receive a copy of the contract, and it is the Supplier's responsibility to ensure that the worker understands the terms and conditions outlined in the contract

before signing it. Any significant changes in employment terms must be mutually agreed upon and documented in writing.

- Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short-term contracting (such as contract labour, casual labour, or day labour), sub-contractors or other labour relationships.
- Fees and costs related to recruitment, employment or termination processes are not imposed on workers, and they are not requested to provide deposits. A written routine related to recruitment is implemented, including rules regarding age verification, candidate screenings and selection, and the use of all labour recruiters.
- Ensure that a regular working week complies with relevant international labour standards. The total working hours, unless in emergency or unusual situations, shall not exceed 60 hours per week, including overtime. Overtime hours are voluntary, and workers have the right to refuse overtime without facing any penalties. Under certain circumstances, well defined by applicable legislation and regulations, overtime hours may be mandatory for a short and limited period, if agreed through worker representation. A reliable system for registering working hours, including overtime, of all workers is maintained.
- Pay wages and benefits at a minimum according to applicable laws, industry standards and relevant collective agreements, whichever is higher. Wages must be enough for employees to meet basic needs and to provide for some discretionary income (so called “living wage”). Workers are compensated for additional living costs resulting from working away from their base location. Wages and benefits are paid in accordance with contractual terms, on time, regularly and in a transparent way. Suppliers shall provide workers with understandable wage statement that includes sufficient information to verify accurate compensation for work. Deduction from wages is permitted only if and to the extent prescribed by applicable law, regulations, or collective bargaining agreements.
- Respect employees’ freedom of association and employees’ rights to collectively bargain with Supplier. These rights are exercised without fear of discrimination, violence, or harassment, whether physical or psychological. In countries where the right to freedom of association is regulated, restricted, or prohibited by law, the Supplier does not hinder alternative forms of independent and free worker representation.
- No tolerance for discrimination at the workplace against anyone (employee or business relation representative) based on age, race, gender, religion, ethnicity, sexual orientation or disability or other relevant characteristics. Treat employees equally, according to their abilities and qualifications.
- Rules regarding discrimination, harassment, business ethics, disciplinary measures, and the consumption of alcohol and drugs are written,

implemented, and communicated to workers. Disciplinary measures exclude any form of mental or physical coercion, including corporal punishment, threats of violence, public warnings or reprimands, financial penalties, and the withholding of contractual benefits. Workers are free to seek assistance and have the right to appeal disciplinary decisions.

- Suppliers shall not require employees or potential employees to undergo medical tests that could be used in a discriminatory way (such as pregnancy, HIV tests etc.), except where required by applicable laws or regulations or necessary for workplace safety.
- A grievance mechanism is established and well known to workers, enabling them to raise issues, file complaints or express concerns without fear of reprisal. Complaints are documented and acted upon, and the anonymity of workers is protected.

Recommendations

- Take active measures for employee wellbeing.
- Where needed, seek to facilitate other forms of worker representation than collective bargaining.
- Promote diversity by striving to reflect the societies where Suppliers operate and promote various aspects of diversity including gender, age, ethnicity, skills, experiences, culture, and personality or other relevant characteristics.
- Contribute to the positive social and economic development of the communities where Suppliers operates and minimise any negative social impacts of its operations on those communities.

6. Health & safety

Requirements

- Commit to zero fatalities at the workplace as well as high-consequence work-related injuries or ill health amongst employees.
- Occupational health and safety risks, including those associated to mental health and ergonomics, are assessed and actions are taken to mitigate them. Safe working routines are implemented to minimise the risks associated with hazardous work.
- Workers are given the necessary and adequate health and safety training or other competence development activities before operating machines, equipment, or performing hazardous tasks. The training provided adheres to relevant legislation and/or identified needs.
- Workers use appropriate PPE (Personal Protective Equipment) and protective clothing that are clean, provided without charge, and in

operational condition based on identified risks. The areas mandating PPE are clearly stated.

- Incidents, accidents, and near misses associated to occupational health and safety are reported, analysed, followed up on, and acted upon. Records of incidents, accidents, and near misses are maintained. Safety hazards are continuously reported, analysed, followed up on and acted upon.
- Accident insurance is provided to all workers. This insurance covers medical treatment for work-related injuries and illnesses, providing compensation in cases of work-related injuries and illnesses that lead to permanent disability or death.
- The working environment and accommodation provided by the Supplier, or on behalf of the Supplier, is in clean, hygienic, and well-maintained condition, has adequate lighting, ventilation and, if needed, heating. Places where workers can dine and rest are accessible, hazard-free, and in proportion to the number of workers. Toilets are available, well-maintained, free of charge, and accessible during working hours, equipped with basic supplies and in proportion to the number of workers. Unlimited, potable drinking water is available, free of charge, and within a reasonable distance from the work area.
- Equipment is kept safe and used under safe conditions. Safety information and/or warning signs are clearly visible in risk areas, using pictures and figurative sign, and/or written in a language understood by the workers.
- Risks of emergency situations are assessed. Written emergency routines are implemented. Workers have competence to manage emergency situations. The evacuation alarm is audible and/or visible to all workers. It is possible to manually activate the alarm and alarm buttons are clearly visible and marked. Emergency evacuation routes and exits are clearly marked, always ensuring quick and safe evacuation. Emergency routines are documented and implemented.
- Evacuation drills are conducted to test the evacuation process and to identify areas for improvement. The frequency of these drills will be determined based on the occupational risks, ensuring high level of worker participation. Records of the evacuation drills are maintained.
- An adequate number of individuals trained in first aid and firefighting are present during working hours to address occupational risks, and they are easily recognised by workers. The first aid and firefighting equipment is adjusted to match the specific occupational risks. All equipment must remain operational at all times.
- Chemicals are purchased, stored, transported, managed, labelled, and used in a manner that protects the health and safety of workers, while mitigating any adverse effects on the environment.

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- Buildings are designed, constructed, maintained, and modified in a way that ensures structural integrity. Electrical wiring, lighting and gas fixtures are properly installed and maintained.
 - The accommodations provided by the Supplier, or on behalf of the Supplier, provide separate accommodations by gender, with a living space that is appropriate for workers. Every worker is provided with an individual mattress and an own personal locker for their belongings. The worker can leave the housing facility during their leisure hours.

Recommendations

- Provide health insurance and extended income security and social benefits, even in jurisdictions where Suppliers are not required to do so.
- Occupational health checks are offered regularly to workers to identify impacts on health resulting from work. Health checks are performed by a healthcare professional. Findings are kept confidential and are used by the healthcare professional to issue recommendations on potential adjustments to the work position or workplace.

7. Business ethics

Requirements

- Prohibit all forms of corruption and bribery including extortion and facilitation payments. The Supplier is expected to refrain from offering or receiving improper benefits or benefits that may be regarded as improper remuneration, with the intention to obtaining, retaining, or directing business to secure any other proper advantage in the Supplier's business with Svea Solar. Such improper benefits (bribes, etc.) comprise, but are not limited to cash, items, pleasure trips, extravagant meals, or services of another nature.
 - A benefit must adhere with the following requirements:
 - The benefit must be permitted by local laws, regulations, and policies.
 - The benefit must have a clear and legitimate business purpose.
 - The benefit must not be provided in exchange for an improper advantage.
 - The nature, value, frequency of the benefit must be appropriate on the occasion on which it is extended.
 - The benefit must be provided in a transparent manner.

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- Ensure that employees of Supplier avoid all conflicts of interest that may impact – or appear to impact – Svea Solar.
 - Business decisions relating to Svea Solar must remain independent from any consideration that does not involve the business at hand and cannot be influenced by private interests.
 - Implement measures to prevent the risk of becoming involved in unethical, illegal or criminal activities such as money-laundering or terrorist financing or engagement with business partners that are the target of economic sanctions or export control laws.
 - Comply with relevant export controls and sanctions laws and regulations, including United Nations sanctions and applicable sanctions under the laws of the European Union, the United States (including but not limited to the U.S. Department of the Treasury's Office of Foreign Assets Control), and the United Kingdom.
 - Comply with the principles of free enterprise and fair competition, including ensuring that no employees engage in discussions or agreements with competitors regarding price fixing, market sharing, bid rigging, or similar.
 - Protect Svea Solar's personal data from any improper disclosure, theft or misuse at all times and respect the right to information and privacy of end users.
 - Pay the right amount of tax, in the right place, at the right time.

Recommendations

- Implement a code of conduct or code of ethics.
- Provide employee training on areas covered by this Supplier Code.

8. Environment and climate change

Requirements

- There is no severe environmental pollution.
- All applicable laws and regulations relating to environmental impacts and protection are complied with.
- Identify actual and potential main material environmental and climate impacts from their operations, including products and services, and take appropriate and reasonable measures to prevent or minimise such negative impact. Environmental complaints are recorded and acted upon. Environmental improvement plans are implemented, reviewed, and updated every 12 months.

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- Resources, including water and waste are managed in a sustainable, safe, and circular way. Current energy sources are known and possibilities to convert to renewable energy sources are identified. Information is available about the type of incoming water that is used and how, where and by whom wastewater is treated.
 - Hazardous waste is not land-filled or incinerated on site, unless for the purpose of recovering energy. Hazardous and non-hazardous waste are kept separate and stored properly. Waste is stored, handled, transported, and disposed of in a way that ensures the health and safety of workers and the environment. Records are available on how, where, how much and by whom waste is treated. Opportunities to refuse, reduce, reuse, and recycle waste are identified and implemented.
 - Current energy sources are known and possibilities to convert to renewable energy sources are identified.
 - Business activities are not conducted in High Conservation Value Areas, unless the area is certified according to a system recognised by Svea Solar.

Recommendations

- Support the Paris Agreement commitment to mitigate climate change by keeping the global temperature rise below 1.5 degrees and implement measures supported by science-based targets to reduce greenhouse gas emissions in operations and reach net zero by 2050.
- Wherever possible promote and contribute to: climate change adaptation; the sustainable use and protection of water and marine resources; the transition to a circular economy; pollution prevention and control; and the protection and restoration of biodiversity and ecosystems,
- To work continuously and systematically towards better environmental performance by setting targets, measuring, and reporting on progress on all areas of materiality.

9. Responsible raw material extraction & supply chain traceability

- Suppliers are expected to exercise due diligence on the source and chain of custody of raw materials such as, but not limited to, Silicon, Lithium, Gold, Tin, Tantalum, Tungsten, Mica, Cobalt, etc. used in the components and products they manufacture. Suppliers need to reasonably assure that the material used are sourced in a manner consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflicted-Affected and High-Risk Areas, or an equivalent and recognized due diligence framework.

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- Suppliers may be required to provide complete and comprehensive information and supporting documentation related to due diligence and traceability to Svea Solar and the respective authorities demanding such. Both Svea Solar and all the company's Suppliers are committed to proactively work on achieving full traceability of the supply chain, all the way back to the sourcing of raw materials.

10. Cyber Security & Data protection

- Suppliers must adhere to applicable data protection laws and regulations, ensuring the confidentiality, integrity, and availability of personal and sensitive data. Suppliers are required to implement robust data security measures in line with industry best practices to protect such data.
- Suppliers are responsible for maintaining secure networks, employing necessary safeguards such as firewalls, encryption, and intrusion detection systems to protect personal, and sensitive data. Regular updates and security patches must be applied to all systems to prevent unauthorized access.
- In the event of a cyber security incident, suppliers are required to promptly notify and cooperate fully in the response and mitigation process. Suppliers must have an established incident response plan to address and report security breaches effectively. In the event of a data breach the Supplier must report the breach within 72 hours of discovery as per applicable data protection laws and regulations.
- Please report the breach by email: privacy@sveasolar.com.
- Access to systems with personal, and sensitive information shall be strictly controlled and limited to authorized personnel only. Suppliers must ensure proper authentication mechanisms and monitor access logs to prevent unauthorized access to such data or systems with such data.
- Supplier must conduct regular training for their employees on cyber security best practices and raise awareness about potential cyber threats. Suppliers are responsible for ensuring that their subcontractors, partners, or suppliers also adhere to applicable privacy and information security laws and regulatory requirements when personal and sensitive data is collected, stored, transmitted, and shared.
- Svea Solar encourages that suppliers have effective business continuity and disaster recovery plans in place to address cyber security risks.

11. Reporting concerns

Svea Solar's external whistleblowing channels is available via <https://sveasolar.com>. It is also possible to report irregularities or misconduct via post to: Svea Renewable Energy AB, Gustavslundsvägen 151 a, 167 51 Bromma, Sweden.

Reports will be received by the Svea Solar's CEO, Chief Human Resource Officer and Chief Legal Officer.

These two whistleblowing channels combined allows workers in our supply chain, members of affected communities or others to report human rights concerns. Complaints and grievances may be made anonymously where permitted by applicable law but contact details to the reporting person is appreciated. Svea Solar investigates and take appropriate corrective actions in response to any human rights violations. We never condition the use of our grievance or whistleblowing channels on the waiver of legal rights.

It is the responsibility of the Supplier to ensure that the content and spirit of this Code are communicated, understood, and implemented within their organisation and to encourage and support all employees in revealing and reporting any behaviours non-compliant with this Code. Explicit or implicit approval of questionable actions will not be tolerated. In addition, Svea Solar encourages all Suppliers to maintain a secure whistleblowing/reporting system of their own and does not tolerate any forms of retaliation against anyone who in good faith submits a report of an alleged violation. Svea Solar requires Supplier to ensure that its employees have the right to raise concerns about potential breaches of this Supplier Code without the fear of reprisals through the Supplier ordinary whistleblowing/reporting channel.

12. Monitoring and enforcement

If a Supplier becomes aware of any violations of this Supplier Code, it is expected to inform Svea Solar without undue delay. Following a violation, Supplier will be given the opportunity to remedy any such violations. If Supplier does not inform Svea Solar about the violation or does not remedy an acknowledged violation, Svea Solar has the right to take legal actions including the right to terminate the commercial agreement between Svea Solar and Supplier.

Svea Solar must have the right to and may verify Supplier's compliance with the requirements in this Supplier Code by means of dialogue, self-assessment questionnaire or on-site audits. Svea Solar must also have the right to conduct interviews with Supplier's employees and gain access to relevant, accurate and complete documentation and records related to this Supplier Code. Audits may be carried out by Svea Solar or an independent third party appointed by Svea Solar. Svea Solar acknowledges that its audit rights including access to documentation and records may be restricted due to Supplier's legal or contractual obligations.

Effective date	Version	Change description
25 April 2025	1	N/A