

# HUMAN RIGHTS POLICY

## 1. PARTICULARS

<b>Risk category</b>	Human rights
<b>Risk assessment</b>	Solar Group, to the best of its knowledge, will refrain from working with business partners that fail to comply with these standards in their operations.
<b>External reference</b>	EU/local directives, regulations and standards, ILO Declaration on Fundamental Principles and Rights at Work, UN Guiding Principles on Business and Human Rights.
<b>Target group</b>	The Human Rights Policy applies to Solar Group and covers our employees, our suppliers and other business partners.
<b>Classification</b>	Public document available on Solar's Intranet and at solar.eu
<b>Latest update</b>	June 2025
<b>Approved by</b>	Executive Board, August 2025
<b>Responsible</b>	CEO
<b>Contact person</b>	Vice-President, Sustainability

## 2. OBJECTIVE OF THE POLICY

Solar is committed to responsible operations. Sustainability is integral to our strategy and business practices. We believe adherence to international protocols, laws, and regulations supports human rights, protects marginalised populations and animal welfare, and ensures transparency across our value chain. Our target is zero breaches of our Human Rights Policy.

We value human life and dignity and foster a culture of respect and inclusion. We aim to be a great workplace by nurturing talent, promoting diversity and encouraging teamwork. We respect the rights of employees, consumers, supply chain workers, local communities, and all stakeholders impacted by our business.

Respecting the rights and interests of others is essential to being a trusted company and achieving Solar's long-term goals.

## 3. SCOPE OF THE POLICY

### 3.1. Human rights at Solar

Solar does not accept any form of forced labour, neither in our own operations nor in the operations of suppliers and other business partners. Employment in a Solar company must always be based on voluntary agreement. Our companies must not have internal procedures or conduct activities that prevent employees from leaving the company at their own volition.

Solar conducts due diligence to ensure responsible business conduct. This involves conducting risk assessments to identify potential negative impacts on people, society, and the environment and to stop, prevent and reduce such impact. The measures put in place are monitored and their effect evaluated. The measures are communicated to those affected by our actions. If our activities are found to cause or contribute to negative impact on people, society, or the environment, we will stop the activities and seek to provide a remedy. If our supplier is responsible for the negative impact, the supplier is responsible for providing a remedy.

Human rights due diligence involves conducting risk assessments to identify and assess potential adverse (negative) human rights impacts associated with our operations, our supply chains and other business relationships, and to cease, prevent or mitigate such impact. The activities are monitored, and their effect evaluated. If we identify that we have caused or contributed to negative impacts, we implement relevant actions to provide remediation, i.e., stop or reverse the adverse impacts. We commit to having effective channels for complaints (grievance mechanisms) that are accessible to all employees and ask our suppliers to do the same.

If we identify adverse impacts which are directly linked to our operations, products, or services through our suppliers or other business partners, we will actively influence the entity causing the adverse impact, to cease, prevent or mitigate the impact. We expect our suppliers and business partners to respect human and workers' rights and establish human rights policies which address the corporate responsibilities outlined in the UN Guiding Principles for Business and Human Rights. If we discover that suppliers or business partners are involved in violations of human rights, we will communicate our

concerns and demand that the supplier or business partner take appropriate action, e.g., through a remediation process. If corrective actions are not taken and the violations endure, an assessment is made of whether to end the business relationship.

Through Solar's Annual Report we report on the activities conducted to identify and address actual or potential adverse impacts, including the findings and outcomes of those activities, and make information about our due diligence policies and processes easily available for external stakeholders. The report sets out Solar's guiding principles for upholding human and workers' rights which we see as relevant to our daily operations. This applies to all Solar subsidiaries and Group functions.

Our ethical requirements for supplier conduct are described in Solar's Supplier Code of Conduct.

### **3.2 Principles for addressing human rights**

All Solar companies must work in a systematic manner to respect human rights, in line with the principles described below.

### **3.3 Freedom of thought, opinion, and expression**

We value open, fact-based, honest, and respectful communication within our own organisation as well as in our dialogue with external stakeholders. We strive to achieve a working environment where employees feel comfortable about expressing their opinion without fear of retaliation. All our companies are required to take appropriate steps to make it easy for employees and external stakeholders to raise concerns and

ensure that stakeholder concerns are handled in a respectful, fair and professional way. We respect freedom of religion, and we strive to foster a working environment where all our employees feel included regardless of religious beliefs or cultural background. Our companies are required to show flexibility when responding to concerns raised by employees in relation to religious customs, provided these do not conflict with business needs or the rights of others.

### **3.4 The right of life**

We do our utmost to protect the health and safety of employees, customers and others linked to our business. All our companies have committed to the vision of zero harm to people, and work purposefully to create safe, healthy, and attractive workplaces, in line with the requirements described in the Health, Safety and Work Environment Policy and the Environment Policy. We make every effort to prevent behaviour or working conditions that may negatively influence the mental and physical health of our employees and their families. Managers must be aware of their responsibility for the safety and well-being of employees and to use the power of their position to foster a positive and healthy working environment. Solar does not tolerate any form of coercion, punishment, or harassment towards employees.

### **3.5 The rights of liberty, security, and privacy**

Solar does not accept any form of forced labour, neither within our own organisation nor within the organisations of suppliers and other business partners. Employment in a Solar company must always be based on voluntary agreement. Our companies do not have

internal procedures or carry out activities that prevent employees from leaving the company at their own volition. We want to show due respect for the privacy of employees, customers and other individuals, and our companies are required to adopt a restrictive stance on employee monitoring and privacy intrusion.

### **3.6 Human trafficking**

We do not accept any form of human trafficking or slavery. This includes actions such as forced labour, forced marriage, sexual exploitation, child labour, and organ removal. We recognise that such practices violate fundamental human rights and are prohibited under international human rights law.

### **3.7 Competence development**

Solar regards employee development as important in the achievement of our business targets and in providing an attractive place to work. We want people to grow and flourish so they can deliver at their full potential. Moreover, we want our employees to feel that their efforts are valued and used in a meaningful way. We want to equip our people with the skills needed to be innovative and relevant in their jobs, and to address a potential future skills-gap. Solar companies are expected to continually invest in the training, education and reskilling of their workforce to adapt to evolving work patterns resulting from new tools and technologies. Our employees should receive at least annual feedback on the quality and performance of their work and are invited to discuss relevant personal development activities.

### 3.8 Diversity and non-discrimination

We regard diversity of perspectives as important in making good decisions, inspiring creativity and generally contributing to business improvement. Our companies are expected to work systematically to promote diversity in the workplace and to prevent discrimination based on gender, religion, race, national or ethnic origin, cultural background, caste, social group, disability, sexual orientation, marital status, age, or political opinion. Our companies are required to foster a culture where personal differences are respected and appreciated, and to promote equal opportunities, particularly in relation to recruitment, compensation and benefits, promotion, and training. Our companies are also required to assess how operating processes and work tools can be adapted to the physical differences of our employees and to make reasonable adjustments accordingly.

### 3.9 Consultation and employee involvement

We regard good internal communication and cooperation between management and employees as critical to the company's success and to the well-being of employees. Our companies must allow employees to be involved in decisions that are relevant to themselves and to the workplace, e.g., in matters pertaining to occupational health and safety and workforce reduction. Our employees are kept updated on company strategy and development through the intranet and relevant meetings. We respect freedom of association and the right to collective bargaining and want to foster a respectful and constructive dialogue between management and trade unions. Our companies must

establish channels for dialogue and cooperation between the management and employee representatives.

### 3.10 Fair working terms

We want to provide just and favourable working conditions for our employees. Our companies must ensure that all their employees, including part-time employees and temporary workers, have a written working contract. Working hours must comply with national law and benchmark industry standards, whichever affords greater protection, and with negotiated company agreements. Work should be organised in a way that allows employees to handle their assigned responsibilities within normal working hours and reasonable actions are taken to prevent an unhealthy workload. The use of overtime must follow national legislation and is based on a framework agreement which has been negotiated with the company's employee representatives. All Solar companies must maintain working conditions that allow employees to balance work and family life, including due consideration for parental duties. Employees must be provided with at least one day off in every seven-day period. All full-time employees must, as a minimum, receive wages and benefits that are sufficient to afford a decent standard of living for the worker and her or his family ensuring a living wage. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs, including provision for unexpected events.

### 3.11 Respect for children's rights

We recognise the vulnerability of children and do our utmost to protect them from physical, mental, or moral harm. We respect children's rights and actively support these through our activities and business relations. No Solar company shall employ individuals who are under the standard age for completing compulsory education, or under 15 years of age, whichever is the highest. Young workers, defined as employees who are above the school-leaving age, but are under the age of 18, must not perform hazardous work, or work to an extent that negatively affects the ability to participate in education. If child labour is found within our own operations, we will immediately remove the child from all work, set up a remediation programme to protect the interests of the child and monitor the progress of the programme until the child has reached working age. Such cases must always be reported to Solar Group, and relevant actions will be determined in a dialogue with the business unit and business area concerned.

### 3.12 Marginalised populations

All our companies must ensure that their operations do not interfere with the right of indigenous people to self-determination, e.g., in relation to land areas or other natural resources upon which they are dependent. If a Solar company's business plan impacts on a marginalised population, the company is required to establish a dialogue with representatives of the population group to find a solution which is satisfactory to both parties.

### 3.13 Animal welfare

Animal welfare must be respected. If a negative impact on animal welfare is detected, we will initiate measures to minimise negative impact on the welfare of production animals and working animals. Solar companies must comply with national and international animal welfare legislation and regulations.

## 4. DEVIATIONS FROM THE POLICY

No deviations from this policy are allowed.

## 5. DIVISION OF RESPONSIBILITIES

The CEO is accountable for this policy. It has been approved by the Executive Board. Day-to-day accountability for ensuring that the Policy is adhered to has been delegated to Solar Group's Senior Vice-Presidents. The policy applies to all Solar's legal entities.

This policy is reviewed annually.