

INTEGRITY AND ANTI-CORRUPTION POLICY

1. PARTICULARS

Risk category	Compliance
Risk assessment	Not complying with this policy may cause reputational damage, have effect on earnings and/or cause compliance issues.
External reference	The ten principles of the United UN Global Compact, Carbon Disclosure Project (CDP), SBTi initiatives and the Danish Financial Statements Act and relevant EU legislation.
Target group	All employees in Solar and relevant business partners.
Classification	Public document available at Solars Intranet and solar.eu
Latest update	June 2025
Approved by	Board of Directors, August 2025
Responsible	CFO
Contact person	Vice President, Internal Audit

2. OBJECTIVE OF THE POLICY

The purpose of the integrity and anti-corruption policy is to facilitate the development of controls that will aid in the prevention and detection of bribery, fraud, and corruption within Solar Group.

It is the objective of Solar Group to promote consistent organisational behaviour by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

3. SCOPE OF THE POLICY

This policy outlines the commitment of Solar Group to uphold the highest standards of integrity and transparency in all its operations. It is designed to comply with applicable legal requirements and ensure ethical conduct within the company.

This policy applies to any irregularity, or suspected irregularity, involving management, employees as well as shareholders, consultants, suppliers, contractors and outside agencies engaging in business with employees of such agencies and/or any other parties with a business relationship with Solar Group. The policy also covers outside fraudsters who wish to gain access to Solar employees, information, assets, or funds.

The policy applies to all employees, contractors, suppliers, and any other third parties associated with Solar Group. It includes a zero-tolerance stance on all forms of unethical activities hence zero incidents on bribery and corruption.

3.1. Definitions

Bribery is defined as any offer, promise, or gift of money, goods, services, or other benefits made with the intention of influencing the actions of the recipient.

Corruption is defined as the abuse of entrusted power for private gain, including acts such as bribery, embezzlement, and favouritism. The abuse may have financial consequence or not, and the actual or reputed advantage is of no consequence.

Fraud is defined as intentional deception by individuals or groups to gain an unfair advantage, resulting in financial loss, reputation damage, or legal consequences. This can include internal fraud (committed by employees) and external fraud (committed by outsiders).

3.2 Non-exhaustive list of unethical activities

The terms misappropriation, embezzlement, and other fiscal irregularities reference, but are not limited to:

- Any dishonest or fraudulent act
- Inappropriate gifts or entertainment to Solar employees
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions

- Profiteering as a result of insider knowledge of Solar Group activities
- Disclosure of confidential and proprietary information to outside parties
- Disclosing to other persons' securities activities engaged in or contemplated by Solar Group
- Accepting or seeking anything of material value from contractors, suppliers, or persons providing services/materials to Solar Group
- Destruction, removal, or inappropriate use of both intangible and tangible assets
- Any similar or related irregularity

3.3 Responsibilities

Each Solar employee is responsible for actively contributing to and upholding an ethical culture within the organization through their professional duties. Internal Audit has the primary responsibility for the investigation of all suspected acts as defined in this policy.

An employee who discovers or suspects unethical activity must contact a superior, Internal Audit or use the whistleblower portal immediately. The employee or other complainant may remain anonymous.

Solar whistleblower scheme provides our employees and external parties with an opportunity to report any unethical activities, or flag any issue, in person or anonymously.

Any irregularity that is detected or suspected must be reported immediately to VP Internal Audit who will coordinate all investigations with other affected areas, both internal and external.

Internal Audit coordinates all investigations with other affected areas, both internal and external. If suspicion about unethical activities, an Investigation Unit is established.

Members of the Investigation Unit will have:

- Free and unrestricted access to all Group records and premises, whether owned or rented
- The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation.

Internal Audit has the primary responsibility for the investigation of all suspected acts as defined in this policy. Internal Audit can use both internal and external resources to conduct the investigation if deemed necessary. Internal Audit coordinates all investigations with other affected areas, both internal and external.

All Solar employees are required to know and follow the Solar Code of Conduct where these suspected acts are outlined.

Group HR must resolve irregularities concerning an employee's moral, ethical, or behavioural conduct.

3.4 Risk Management

The overall risk identification and assessment of bribery, fraud, and corruption, within Solar operations and supply chain, are described in the risk management policy and process methodologies. Details of preventative measures and / or risk mitigations are within our Code of Conduct, training programs, internal controls, and due diligence processes. The monitoring and reporting procedures are within this process. The governance framework for Solar Group's policies is documented and accessible to all employees within Solar's systems.

3.5 Training and awareness

Solar requires new employees to read, understand, and acknowledge their responsibilities in this area within our Code of Conduct. Solar clearly communicates our non-acceptance and how employees must act when they observe instances of non-conformance to our ethos.

3.6 Compliance and monitoring

Internal Audit regularly reviews and updates this policy to ensure compliance with the relevant applicable regulations and requirements. Internal Audit monitors the adherence to this policy through audits and assessments.

3.7 Reporting procedures

Employees must report any suspected bribery or corruption through our confidential and secure whistleblower portal. All enquiries concerning the activity under investigation by the suspected individual, their lawyer or representative, or any other enquirer should be directed to Internal Audit. The individual who has made the report should be informed of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution
- Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by Internal Audit.
- If the investigation substantiates that fraudulent activities have occurred, Internal Audit will issue reports to the Executive Board and appropriate designated personnel and to the Audit Committee.

3.8 Termination

If an investigation results in a recommendation to dismiss an individual, the recommendation will be reviewed for approval by the designated representatives from Human Resources and, if necessary, by outside legal counsel, before any such action is taken. Internal Audit does not have the authority to dismiss an employee. The decision to dismiss an employee is made by the appropriate authority within the organization. Solar Group enforces a strict zero-tolerance policy in this regard.

3.9 Confidentiality

Internal Audit and member of the investigation Unit treat all information received confidentially.

4. DEVIATIONS TO THE POLICY

No deviations from this policy are allowed.

5. DIVISION OF RESPONSIBILITIES

Solar's Executive Board and local management at the individual subsidiary is responsible for the detection and prevention of bribery, fraud, corruption, misappropriations, and other irregularities. The CFO is accountable for this policy while Internal Audit is responsible for monitoring the implementation on the policy and the follow-up.