

Preamble

IBC SOLAR is committed to ecologically and socially responsible corporate governance. Our sustainability mission statement encompasses compliance with ethical business practices, the implementation of environmentally friendly processes and the promotion of social responsibility.

The preservation and protection of our environment, easy access to a sustainable and reliable energy supply, the satisfaction of our customers and the health of our employees are IBC SOLAR's top priorities. Implementing these requirements helps us to ensure the profitability and continued existence of the company. As a leading full-service provider of energy solutions and services in the field of photovoltaics and storage, the company offers complete solar systems and covers the entire spectrum from planning to the turnkey handover of photovoltaic systems.

With our activities, we want to contribute to the conservation of the earth's finite energy resources, to overcome the risky generation of electricity using nuclear energy and to enable everyone to be supplied with 100% renewable and CO₂-free energy.

A Fundamental position

IBC SOLAR is aware of its responsibility to respect human rights and to prevent any kind of human rights violations both within our company and along our supply chains. We ensure relevant standards for working conditions and respectful interaction with one another. The well-being of all people involved is of considerable importance to us.

Human rights standards refer to the rights set out in the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR) and recognised regional and national systems for the promotion and protection of human rights.

The purpose of this policy statement is to reaffirm our ongoing commitment to respecting human rights in the conduct of all our business activities, both in our own operations and in relation to our direct and indirect suppliers. In addition, it should serve to present mechanisms that prevent or minimize the human rights risks relevant to the company.

B Scope of application and responsibility

This policy statement applies from 1 January 2024 to IBC SOLAR and all its subsidiaries and holdings in which IBC SOLAR directly or indirectly holds > 50% of the shares or otherwise exercises a decisive influence.

We are committed to protecting the environment and see it as our task to avoid environmental pollution. We are committed to energy self-sufficiency and zero emissions using solar energy. With regard to the health and safety of our employees, the prevention of work-related illnesses and injuries is our top priority. Compliance with social and ethical standards in line with our CSR declaration is a matter of course for us.

Through this policy statement, our company management clearly positions itself in favour of respecting and supporting compliance with the following human rights and environmental obligations:

Our employees and society

- Prohibition of child and forced labour, slavery and human trafficking:

We reject all forms of forced or child labour without exception and are expressly committed to the prohibition of modern slavery or human trafficking.

- Equal treatment of employees and zero tolerance of discrimination:

We ensure equal opportunities and do not tolerate discrimination on the basis of, for example, race, gender, religion, national origin, political opinion, sexual orientation, social background, age and physical or mental characteristics.

- Freedom of association and collective agreements:

We respect the right of our employees to join a trade union. In addition, we support and initiate intensive dialogue with the respective employee representatives.

- Health and safety:

Health protection and occupational safety are our top priority. We comply with applicable occupational health and safety laws worldwide and also establish our own occupational health and safety standards at all our locations.

- Fair working conditions and remuneration:

We ensure fair working conditions, fair remuneration and working hours in accordance with the national and international laws and guidelines applicable to our companies.

- Prohibition of unlawful forced evictions
- Prohibition of violence by security forces

Our planet and its resources

We are committed to reducing the negative impact of our business activities on the environment, conserving our natural resources and seeking solutions that help to protect our environment. We also have the same expectations of our suppliers, which are also set out in our Supplier Code of Conduct. We place particular emphasis on the following aspects:

- Protection of the environment and prevention of unlawful environmental impacts, including in the context of the Basel Convention (regarding the handling of hazardous substances and waste) and the Minamata Convention (minimising the release of mercury).
- Prohibition of causing harmful soil change, water pollution, air pollution, harmful noise emissions or excessive water consumption, as well as any violation of human rights through environmental damage.

We will contribute to the protection of the environment through our sustainable business activities and, through the use of renewable energies, enable a sustainable, environmentally friendly and conflict-free energy supply worldwide in the long term. IBC SOLAR is aware of its responsibility as an important company and employer in the Upper Franconia region and therefore supports social, cultural and environmentally relevant activities.

Our supply chain

We also expect our business partners, including our direct and indirect suppliers, to be aware of their human rights, environmental and social responsibilities and to always comply with certain basic ethical principles in their activities in accordance with this policy statement.

Our Supplier Code of Conduct, together with this policy statement, sets out the IBC SOLAR Group's expectations of its suppliers and the entire supply chain. We expect all business to be conducted in accordance with the Supplier Code of Conduct.

C Implementation of our human rights due diligence

Risk analysis and measures in our own business area

IBC SOLAR has established the necessary processes in corporate principles, guidelines and work instructions for the adequate protection of human rights in its own business area, which apply and are implemented throughout the entire group of companies. All employees and third parties have unrestricted access to an anonymous and fair complaints procedure. Training is also provided on how to deal with relevant human rights and environmental risks.

Risk analysis and measures in the area of business partners

We have integrated a comprehensive risk management programme, which we have developed with special consideration of our individual risk profile, taking into account, for example, our industry, our product portfolio and our business activities in countries with an increased risk of corruption or human rights violations.

As part of our risk analysis, we have implemented strict monitoring and control activities to ensure that our standards and requirements are met in our day-to-day business. At the same time, we carry out regular risk analyses in order to continuously update and develop our assessment mechanisms.

In cases where risks are identified, appropriate measures are initiated, whereby a well-founded decision on further business activities is required, particularly in the case of serious risks. IBC SOLAR is prepared to terminate a business relationship even if it is legally permissible but poses an unacceptable risk to IBC SOLAR's values.

Risk analysis and measures along the supply chain

IBC SOLAR has identified relevant direct suppliers and requested them to provide a comprehensive self-disclosure. In a first step, suppliers with high turnover and significance were considered.

The supplier selection and prequalification process was adapted to ensure human rights screening right from the start of new business relationships.

The supplier evaluation is based on a detailed survey using questionnaires. The core topics are environmental protection, human and labour rights, occupational safety, anti-corruption and anti-bribery as well as responsibility in the supply chain. In addition, suppliers must submit relevant certificates and update them if necessary. This data forms the basis for the necessary monitoring and evaluation activities as well as a corresponding risk analysis.

The risk analyses carried out have shown that there could be potential risks in the supply chain with regard to working conditions, the environment and occupational health and safety. One example of this would be the processing of polysilicon in Xinjiang, which is internationally suspected of being produced using labour from the oppressed Uyghur minority in China. There are also increased risks for certain suppliers due to their location in so-called "very high risk" countries.

In order to minimise and mitigate risks, appropriate preventive and countermeasures have been defined and integrated into a multidisciplinary process that also provides for an escalation procedure. IBC SOLAR will also take appropriate measures if it obtains substantiated knowledge of a violation of a human rights-related or environmental obligation by a direct or indirect supplier.

D Basic preventive and remedial measures

Complaints mechanism

The IBC SOLAR complaints mechanism, consisting of a web-based whistleblower system, is a confidential contact point that is available to all IBC SOLAR employees and affected persons in the supply chain as an additional communication channel. This means that concerns or information about possible violations of human rights and environmental due diligence obligations can also be submitted anonymously.

We investigate all reports on the basis of binding internal regulations. Every investigation is independent and objective. All reports and the respective investigations are regularly reported to the management in a standardised procedure. IBC SOLAR does not tolerate any discrimination or disadvantaging of persons on the basis of a report via the complaints mechanism or other communication channels.

Link: www.sicher-melden.de/IBC-Solar-LkSG

Training and sensitisation

We can only deliver high-quality performance if our employees are appropriately motivated and involved. Through comprehensive internal information, the transfer of responsibility and competences, as well as regular discussions, employees are involved in the realisation of company policy. We are also committed to consulting and involving employees in the decision-making process. Promoting the health of our employees through a variety of measures is part of our daily management responsibility. Constant technical and personnel development and continuous knowledge growth are necessary prerequisites for us and are encouraged. We put this knowledge into practice through personal commitment and the motivation of everyone. For us, responsibility also means identifying, regularly assessing, and fulfilling the applicable legal obligations.

We offer our employees training courses that cover topics such as human rights, sustainability, health and safety, the environment, equal opportunities and much more. In addition, we are continuously working to expand our training programme. This includes, for example, offering training on human rights and environmental due diligence for selected target groups. In addition to our employees, we also refer our suppliers to corresponding training programmes.

Remedial measures

If violations of human or environmental rights are identified that were caused by IBC SOLAR or to which IBC SOLAR has contributed, we undertake to prioritise and process these incidents according to impact and severity.

Improvement and further development

We firmly believe that addressing human rights and environmental challenges in our global supply chains is an ongoing task that requires systemic change in addition to our company-specific initiatives. Collaboration with our suppliers and business partners is essential in this regard.

IBC SOLAR will therefore critically review its role and the implementation of human rights due diligence obligations on a regular basis and continuously develop them further. This also applies to our various internal guidelines and processes relating to human rights.

E Responsibilities

Consistent and sustainable action is our promise. Overall responsibility for human rights and environmental due diligence lies with the Executive Board of IBC SOLAR. It includes at least the control and monitoring of LkSG-related measures. In implementing this policy statement, the Executive Board must inform itself regularly, at least once a year, about the work of the responsible person or persons.

Every department in the organisation is obliged to adhere to this policy statement and to implement these principles. Responsibility for the implementation of human rights due diligence lies with the respective department heads.

The Human Resources department is responsible for coordinating measures to respect human rights and fair working conditions. Processes for upholding due diligence within our supply chain are developed and defined by the Supply Chain Management department.

Mr Stefan Horstmann, COO IBC SOLAR, has been appointed Human Rights Officer, who is supported by several departments. Our Human Rights Officer is responsible for monitoring the mechanisms described in the policy statement and is always informed if a risk is identified. In high-risk cases, our Human Rights Officer also takes on an advisory role and participates in the final decision-making process.

IBC SOLAR will critically review this policy statement and its implementation regularly and, if necessary, on an ad hoc basis and update it as required.

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