




Leeward Renewable Energy (LRE) Supplier Code of Conduct

Issued: 02/11/2022

Version: 1 .1

Eran Maliner
Approved by

12/15/2022
Date

	Supplier Code of Conduct Reviewed By: Department Manager Approved by: CCO	Version: 1.1 Effective Date: 02/11/2022 Page 2 of 8
---	--	--

LRE Supplier Code of Conduct

Acting with Integrity is a core value for Leeward Renewable Energy, “LRE”. We seek to lead with strong ethics, we work to act with integrity and when faced with opportunities for choice we will work to do “the right thing” every day. To preserve the trust placed in us, we count on our network of suppliers and business partners across the globe to commit to and uphold our standards for integrity, to model our values, and to exercise our operating principles.


Our Supplier Code of Conduct outlines LRE’s expectations and guidelines with respect to responsible sourcing, which includes our commitments to human rights, the environment, health and safety, business ethics, and the development of a diverse and sustainable supply chain. The Supplier Code is aligned with the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and we require all Suppliers and business partners to comply with this Supplier Code. “Suppliers” refers to any party that provides goods or services to LRE for compensation, including our direct and indirect suppliers, labor providers, logistic providers, and distributors, and in each case including such party’s parent, subsidiary, or affiliate entities, and their respective employees, agents, and other representatives. Suppliers are also expected to cause their subcontractors to adhere to the Supplier Code of Conduct.

Compliance

We expect our Suppliers and business partners to communicate these expectations throughout their supply chain by adopting effective management systems, policies, procedures, and training to uphold the standards and expectations set forth in this Supplier Code within their own business operations. We require our Suppliers to abide by all applicable national, state, and local laws/regulations in the markets where they operate; however, where local laws or standards differ from this Supplier Code of Conduct, we expect our Suppliers to comply with the more stringent standards and principles.

Raising a Concern

LRE is committed to conducting business with integrity. We expect all suppliers working on our behalf to maintain these high standards. LRE provides an anonymous platform where people are treated with respect, and concerns are promptly and professionally handled. If a supplier should need to raise a concern, they are encouraged to use LRE’s ethics hotline service to submit a concern, www.lighthouse-services.com/leewardenergy. We expect our suppliers to have a reporting system in place to ensure employees can voice concerns anonymously and without fear of retaliation. LRE does not tolerate any form of retaliation against anyone who reports suspected or known cases of misconduct in good faith and expects suppliers to uphold the same standard.

	Supplier Code of Conduct Reviewed By: Department Manager Approved by: CCO	Version: 1.1 Effective Date: 02/11/2022 Page 3 of 8
---	--	--

Labor and Human Rights

Diversity and Inclusion

LRE is committed to providing an inclusive, diverse, and equitably enabled workforce and culture. We are committed to equal opportunity and intolerant of discrimination and harassment. LRE is dedicated to maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, color, national origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, or any other status protected by applicable law.

LRE expects suppliers to uphold the same diversity and inclusion commitments and to employ a workforce that is representative of our employees, customers, and communities that we power with clean, renewable energy.


Child Labor

LRE does not tolerate any form of child labor in our supply chain and Suppliers must adhere to ILO Convention 138 & 182. LRE expects our Suppliers to prevent child labor in their operations and encourages our Suppliers to participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain.

- No individuals are to be hired under 15 years of age, or 14 years of age where local law allows, and such exception is consistent with ILO Convention No. 138 & 182, or under the legal minimum age for employment in the country, whichever is greatest.
- Any employment of workers under the age of 18 must not interfere with schooling or vocational education or expose children to risks that can harm physical, mental, or emotional development.

Forced Labor and Human Trafficking

LRE does not tolerate any form of involuntary, exploitive, abusive, or illegal labor in our supply chain such as forced labor or human trafficking. Suppliers must warrant that none of the component parts of the Products are manufactured or shall be manufactured in, and polysilicon has not and shall not be procured from Xinjiang, China, or any other location that uses convict labor, forced labor, or indentured labor under penal sanctions. Seller shall not be excused from performance under the PO based on the passage of any laws or trade measures affecting the export or import of products with silica manufactured in Xinjiang, China, which includes the Uyghur Forced Labor Prevention Act. Supplier shall provide sufficient traceability documentation to demonstrate that silica, and the components that make up the Products, are not subject to any restrictions related to import into the United States relating to convict labor, forced labor or indentured labor. Further, the Supplier shall comply, and cause its affiliates, subcontractors, and vendors to comply, with all requirements set forth in Exhibit K with respect to all of the Products and its performance under the PO. Supplier shall cooperate with LRE in confirming compliance with Exhibit K, including by promptly furnishing such documents and other information as may be reasonably requested by LRE and allowing for customary review of various

	Supplier Code of Conduct Reviewed By: Department Manager Approved by: CCO	Version: 1.1 Effective Date: 02/11/2022 Page 4 of 8
---	--	--

books and records by Buyer or by the independent engineer retained by the Financing Parties to confirm compliance. Consistent with Section 307 of the Tariff Act of 1930 set forth at 19 U.S.C. 1307 and the Uyghur Forced Labor Prevention Act of 2021, which Suppliers are required to comply with, LRE requires that all labor in its supply chain be voluntary and that workers are allowed freedom of movement. All forms of forced labor and human trafficking are prohibited including, but not limited to, any form of prison, slave, bonded (including debt bondage), forced, or indentured labor.

- The recruitment, transportation, transfer, harboring or receipt of persons, by means of threat or use of force, coercion, abduction, fraud, or other means, for the purpose of exploiting them is prohibited.
- There must be no unreasonable restrictions on workers’ freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities including, if applicable, workers’ dormitories or living quarters.
- All work must be voluntary, and workers should be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker’s contract.
- Employers, agents, and sub-agents’ must not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents.
- Workers must not be required to pay employers’ agents or sub-agents’ recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.


Conflict Minerals

If our Suppliers operate in or source from conflict-affected areas, we expect them to conduct due diligence aimed at ensuring they are not linked to providing funding or support to armed actors. In addition, we expect our Suppliers to ensure that their products do not contain conflict minerals sourced from mines that support or fund conflict in conflict-affected areas as stated in Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, Pub. L. No. 111-203, 124 Stat. 1376 (2010), and the rules and regulations promulgated thereunder.

Business Ethics

LRE is committed to conducting business ethically and lawfully in countries where we operate and across our supply chain. We are committed to doing business with Suppliers and business partners who demonstrate a strong commitment to ethical behavior.

- Suppliers must conduct their business in accordance with the highest ethical standards and have controls in place that prohibit and detect the misuse of company assets, corruption, bribery, improper gifts, extortion, embezzlement and even the appearance of conflicts of interest.

	Supplier Code of Conduct Reviewed By: Department Manager Approved by: CCO	Version: 1.1 Effective Date: 02/11/2022 Page 5 of 8
---	--	--

- Suppliers’ business dealings should be fair, legal, and honest.

Anti-Corruption

Suppliers shall abide by and perform their obligations in manner consistent with all applicable anti-corruption, anti-bribery, sanctions and anti-money laundering laws and regulations of the countries in which they operate and in which LRE operates, including Canada’s Corruption of Foreign Public Officials Act (“CFPOA”), the U.S. Foreign Corrupt Practices Act (“FCPA”), and LRE’s Code of Conduct and Anti-Bribery & Corruption Policy and all other applicable rules and guidelines for compliance with the CFPOA, FCPA,.

Political Contributions and Lobbying

Suppliers are not authorized to make any type of political contribution or donation on LRE’s behalf. Suppliers are not authorized to engage in any type of lobbying or other similar representative efforts on LRE’s behalf with or before any international, federal, state, or local government entity, official, body or representative without the express written consent LRE.

Conflict of Interest

Suppliers must not enter a financial or any other relationships with a LRE employee that creates any conflict of interest. A conflict of interest is an activity or interest that is inconsistent with or opposed to the best interests of LRE and may arise when a Supplier takes actions or has ownership interests that influence the ability to perform his or her work objectively and effectively on behalf of LRE. Further, LRE property and information should never be used for personal gain or for the benefit of a Supplier’s family or friends or anyone who may use the property or information for personal gain.


Gift Giving and Receiving

Giving and receiving business gifts and entertainment can create a sense of obligation or appearance of favoritism. Such exchanges may also violate LRE policy or the law. Suppliers must not provide gifts, entertainment, or preferential personal treatment or services with the intent to, or that could, influence or create the appearance of influencing decision-making by LRE employees, customers, or business partners.

Environmental Protection

LRE is committed to Sustainability in All We Do –by making long-term decisions, we seek to reduce our environmental impact across our supply chain, and to follow sustainable land-use, construction, and operational production practices. We strive and encourage our Suppliers to reduce our collective impact on air, land, and water.

- Suppliers are encouraged to implement industry best practices, and must fully comply with all applicable national, state, and local environmental laws, regulations, and applicable project permit conditions including those related to spill prevention, waste disposal, hazardous waste,

	Supplier Code of Conduct Reviewed By: Department Manager Approved by: CCO	Version: 1.1 Effective Date: 02/11/2022 Page 6 of 8
---	--	--

greenhouse gas emissions, wastewater, toxic substances, and protection of environmentally sensitive plant and animal species.

- Suppliers are encouraged to reduce or eliminate waste of all types, including raw materials, water, and energy, either at the source or by practices such as efficiency in processes, materials substitution, and conservation. Suppliers are further encouraged to develop and utilize systems that support responsible management of product end-of-life, including recycling and re-using materials. Suppliers are encouraged to implement their own no deforestation policy and commitments to protecting high conservation value and high carbon stock areas.
- Suppliers are encouraged to actively measure, manage, and disclose environmental impacts in areas such as Greenhouse Gas (GHG) emissions, water, and waste as well as to set targets and implement action plans for reducing environmental impacts. Public reporting on annual environmental performance is encouraged.

In the spirit of continuous improvement, LRE is committed to working with and supporting our Suppliers to meet, and when possible, exceed, the requirements in this Supplier Code of Conduct.

MANAGEMENT SYSTEMS


Audit and Compliance

Suppliers must ensure that adequate and effective management systems, policies, procedures, financial documentation, and training are in place to ensure compliance with LRE’s Supplier Code of Conduct. We reserve the right to request Supplier references and contact the referenced parties, request, and review Suppliers’ financial statements, conduct announced facility visits and industry customary audits.

Recordkeeping

Suppliers are expected to commit to maintain accurate company records and accounts to ensure legal and ethical business practices and to prevent fraudulent activities. All business records, including, among others, payroll, timecards, travel and expense reports, emails, accounting and financial data, operation, maintenance and testing records, maps, drawings, plans, and diagrams, measurement and performance records, electronic data files, photographs, and all other records maintained in the ordinary course of our business must accurately reflect transactions and events and conform both to generally accepted accounting principles and to applicable internal LRE controls, and must be complete, accurate and reliable in all material respects. Further:

- No entry may be made in any record that intentionally hides or disguises the true nature of a transaction.
- All LRE information related to a given subject is to be preserved when the supplier is notified of pending litigation or issued a “legal hold” order by LRE.
- Except as required under a “legal hold” order, LRE records are to be discarded in accordance with LRE’s applicable records retention schedule.

	<p style="text-align: center;">Supplier Code of Conduct</p> <p>Reviewed By: Department Manager Approved by: CCO</p>	<p>Version: 1.1 Effective Date: 02/11/2022 Page 7 of 8</p>
---	--	--

- Suppliers are prohibited from altering, removing, or destroying LRE documents or records in violation of LRE 's policies.

This Supplier Code of Conduct shall be reviewed semi-annually by senior management to ensure LRE is in compliance with all Federal, State, and Local requirements.