




Supplier Code of Conduct

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Version: 1.2

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Approved by ESG Steering Committee Chair	Date

	<h2 style="text-align: center;">Supplier Code of Conduct</h2> <p>Reviewed By: Department Manager Approved by: CCO</p>	<p>Version: 1.1</p> <p>Effective Date: MM/DD/2023</p> <p>Page 3 of 8</p>
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1. LRE Supplier Code of Conduct

Our Supplier Code of Conduct outlines Leeward Renewable Energy's (LRE) 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.

We expect all Suppliers to implement this Supplier Code of Conduct in a diligent and transparent manner. "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 this Supplier Code of Conduct.

1.1. Compliance

We expect our Suppliers 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 of Conduct 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.


1.2. 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.

2. Labor and Human Rights

2.1. 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.

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

2.2. Child Labor


LRE prohibits the employment of children under the age of 16 or the minimum age specified by local law, whichever is higher. Children under the age of 18 shall not perform hazardous work.

2.3. Forced Labor

LRE does not tolerate any form of involuntary, exploitive, abusive, or illegal labor in our supply chain such as forced labor, including human trafficking and slavery. Suppliers must warrant that none of the component parts of the products provided to LRE 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, or from any entities in Xinjiang that mine, produce, or manufacture wholly or in part any goods, wares, articles and merchandise with forced labor (available at: <https://www.dhs.gov/uflpa-entity-list>). Supplier shall provide sufficient traceability documentation to demonstrate that silica, and the components that make up the products provided to LRE, are not subject to any restrictions related to import into the United States relating to convict labor, forced labor or indentured labor. Supplier shall cooperate with LRE in confirming compliance with this Supplier Code of Conduct, including by promptly furnishing such documents and other information as may be reasonably requested by LRE and allowing for customary review and audit of various books and records by LRE or by a third party engaged by or on behalf of LRE or its financing parties or other stakeholders 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 2022, 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 and are not subject to abusive or exploitative conditions. 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.

In addition, Suppliers are required to adhere to the following standards:

- 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 the worker's contract.

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- 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.

2.4. Responsible Minerals Sourcing

LRE requires that each Supplier adopt a responsible minerals sourcing policy and exercise due diligence on the source and chain of custody of the tin, tantalum, tungsten, gold and cobalt in the products it manufactures to reasonably assure that they are sourced in a manner consistent with the Organization for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the supplements thereto or an equivalent and recognized due diligence framework.

3. 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 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.
- Suppliers' business dealings should be fair, legal, and honest.

3.1. Anti-Corruption

Suppliers shall abide by and perform their obligations in manner consistent with all applicable anti-corruption, anti-bribery, sanctions, export and import control, and anti-money laundering laws and regulations, including laws and regulations of the countries in which they operate and in which LRE operates, such as, among others, Canada's Corruption of Foreign Public Officials Act ("CFPOA"), the U.S. Foreign Corrupt Practices Act, as amended, ("FCPA"), and LRE's Code of Conduct and Anti-Bribery & Corruption Policy .

3.2. Political Contributions and Lobbying

Suppliers are not authorized to make any type of political contribution or donation on LRE's behalf or in LRE's name. 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 of LRE.

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3.3. Conflict of Interest

Suppliers are prohibited from entering into a financial or any other type of relationship with any 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.

3.4. 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, preferential personal treatment, services, or anything of value with the intent to, or that could, influence or create the appearance of influencing decision-making by LRE, its employees, customers, or business partners.

4. Environmental Protection

By making long-term decisions, LRE seeks 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 for environmental protection, and must fully comply with all applicable national, state, and local environmental laws, regulations, and applicable project permit conditions including those related to pollution, spill prevention, waste disposal, hazardous waste, air 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, packaging, 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 adopt policies against deforestation and commitments to protecting high conservation value and high carbon stock land and water resources.
- Suppliers are encouraged to actively measure, manage, and disclose the environmental impacts of operations, such as Greenhouse Gas (GHG) and other air emissions, water use, and waste generation as well as to set targets and implement action plans for reducing current impacts. Public reporting on annual environmental performance is also 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.

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5. Management Systems

5.1. 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 and policy documents, and conduct announced facility visits and industry customary audits.

5.2. 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.
- Suppliers are prohibited from altering, removing, or destroying LRE documents or records in violation of LRE 's policies.