



# HUMAN RIGHTS POLICY

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# Contents

INTRODUCTION ..... 2

REGULATORY FRAMEWORK ..... 2

SCOPE ..... 3

ANALYSIS OF RISKS ASSOCIATED WITH HUMAN RIGHTS.....4

PRINCIPLES OF ACTION .....4

RELATION WITH INTEREST GROUPS.....7

DISCLOSURE AND COMPLIANCE.....8

RELEASE AND COMING INTO EFFECT .....8

## INTRODUCTION

At Solaria, we believe it is of utmost importance to comply with human and labor rights in our relations with interest groups.

The purpose of this document (hereinafter the “Human Rights Policy”) is to formalize the commitments of Solaria Energía y Medio Ambiente, S.A. (hereinafter “Solaria” or “the Company”) and its subsidiaries (hereinafter “Solaria Group”) to comply with human rights as defined under domestic and international legislation and their commitment to implementation of the principles and values that Solaria Group applies to human rights, pursuant to the provisions of its corporate code of ethics, legislation and benchmark standards.

The Human Rights Policy was designed to be a part of the Company’s rules and is to be used to manage risk and to minimize potential infringement of said rights at the corporate level. As such, it is an integral part of Solaria’s corporate policies.

## REGULATORY FRAMEWORK

This policy is built on the principles that drive Solaria’s commitment to human rights, and it reflects the most significant international declarations on the matter:

- The International Bill of Human Rights, comprised of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights with its two Optional Protocols, and the International Covenant on Economic, Social and Cultural Rights.
- The Declaration of the International Labour Organization regarding the Fundamental Principles and Rights at Work and its eight core conventions.
- The International Labour Organization (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- The United Nations Guiding Principles on Business and Human Rights.
- Spain’s National Plan on Business and Human Rights.

- OECD Guidelines for Multinational Enterprises.
- The Ten Principles of the UN Global Compact.
- The Equator Principles.
- The UN Convention on the Rights of the Child and both of its Optional Protocols.
- The UN Principles for Responsible Investment.

Solaria maintains several practices to safeguard internationally recognized human rights, in addition to its strict compliance with applicable legislation and benchmark standards:

- Corporate Code of Ethics
- Suppliers' Code of Ethics
- Sustainable Commitments
- Equality and Diversity Policy
- Environmental Respect Policy
- Policy on Privacy and Protection of Personal Data
- Compliance Channel
- Training

Solaria upholds the UN Global Compact through the Spanish Network by defining and bolstering its firm commitment to the ten universally accepted principles of the United Nations regarding human rights, labor standards, environmental issues and the fight against corruption and by taking measures to support the UN objectives in their current form of Sustainable Development Goals (SDGs) and the 2030 Agenda.

## SCOPE

This policy applies to the Solaria Group and all of its employees, regardless of position or function.

The policy may also be applied, in part or as a whole, to any other individuals and/or legal entities that are associated with Solaria Group through a non-professional relationship when this is possible due to the nature of the relationship and when it is an integral part of the purpose of said relationship.

## ANALYSIS OF RISKS ASSOCIATED WITH HUMAN RIGHTS

Solaria is committed to safeguarding the human rights of its employees and those of society in general.

The Company's position on human rights is based on the minimization of risks associated with human rights through the following:

- Commitment and awareness through policies, internal plans and employee training.
- Analysis of risks associated with human rights, based on the likeliness of the occurrence of harm or infringement and distinguishing between low risk when deemed unlikely, medium risk when deemed likely, and high risk when deemed very likely.
- Establishment of channels for communication, reporting and/or filing complaints.

## PRINCIPLES OF ACTION

Solaria is committed to the upholding of human rights. Its actions are determined by observance of applicable legislation, international benchmark standards, the Company's Corporate Code of Ethics and its other corporate rules and policies. To this end, Solaria also observes other rules and guidelines, including but not limited to the following:

- **LABOR RIGHTS**

Solaria observes the human rights of all of its employees and others associated with the Company by taking all possible measures to prevent infringement, including:

- Equal opportunity and non-discrimination: Solaria has a zero-tolerance approach to discrimination or any practice that is detrimental to human dignity. The Company promotes and practices equal-opportunity employment, training and company benefits.

Solaria ensures that none of its employees is assigned duties that are incompatible with his or her physical or mental capacity and guarantees non-

discrimination in the workplace based on gender, race, color, religion, background, ethnic or social origin, age or disability.

Solaria maintains a policy on diversity and equality that specifically defines the diversity-related commitments it has assumed. The Company also observes specific rules and guidelines on hiring practices and maintains internal policies and plans in relation to human resources.

On a regular basis, Solaria verifies the number of female employees it has hired, determining whether or not any gender pay gaps exist and establishing pertinent annual objectives.

- Freedom of association: Solaria respects its employees' rights to join labor unions and to take part in collective bargaining, as set forth in its Code of Ethics.
- Forced labor: Solaria expressly prohibits any type of exploitation in the workplace, forced or involuntary labor, threats or abuse toward physical well-being, sexual or job-related harassment and other forms of intimidation, including verbal abuse. To this end, Solaria maintains an anti-harassment policy in addition to its Corporate Code of Ethics.

As a Spain-based company, Solaria complies with applicable labor legislation and, among other measures, it enters into employment contracts with all of its employees and observes the established labor agreement.

All of the Company's suppliers are required to sign a statement of acceptance of the Suppliers' Code of Ethics in which they confirm that none of their employees are subjected to forced labor or any type of exploitation or harassment.

- Child labor: Solaria guarantees that all of its employees are of a legal age to work, in accordance with applicable local and EU legislation in each of its areas of operation.

As a Spain-based company, Solaria complies with applicable labor legislation and, among other measures, it enters into employment contracts with all of its employees and observes the established labor agreement.

All of the Company's suppliers are required to sign a statement of acceptance of the Suppliers' Code of Ethics in which they confirm that none of their employees are subjected to forced labor or any type of exploitation or harassment.

- Fair wages and favorable workplace conditions: Solaria ensures that the wages and benefits of its workforce are in line with applicable legislation in each of its areas of operation.
- Health and safety in the workplace: Solaria ensures the safety of its employees and is committed to compliance with applicable legislation on labor and social security and to meeting the requirements of the International Labour Organization. The Company is currently up to date in the payment of wages and all contributions to Social Security and workers' compensation.

Solaria guarantees that all of its employees work in safe and healthy conditions.

To this end, the Company maintains its policy on health and safety in the workplace, it assesses every year the risks faced by all of its employees, it performs internal audits to verify compliance with safety measures and it monitors incident and accident rates.

Furthermore, Solaria requires its suppliers to submit documentation of the job history of employees who are to engage in collaboration, it requires that they accept the Company's policies, including its Suppliers' Code of Ethics and policy on health and safety in the workplace, and it provides its suppliers with questionnaires to evaluate their handling of job-related and environmental issues.

- **OTHER HUMAN RIGHTS**

Solaria is committed to observing and complying with all human rights included in benchmark standards of a civil, political, economic, social or cultural nature, complying with applicable legislation and benchmark standards, including:

- Freedom of expression, conscience, opinion and religion.
- Right of information and participation.
- Right of assembly, protest and association.
- Privacy and protection of personal data: Solaria guarantees the right of data protection of all individuals who collaborate with the Group. The Company observes the right of honor and intimacy in the processing of different kinds of

personal data, and it is committed to maintaining the utmost discretion in relation to the personal data it accesses, to disclosing the data only to authorized personnel and to observing all pertinent provisions of applicable legislation.

Solaria, as part of its Privacy and Data Protection Policy, requests written consent for the processing of the personal data of all of its collaborators.

- Right to health.
- Right to education.
- Economic, social and cultural rights.
- Right to use water and to work in dignity: Solaria guarantees for all who are employed directly or indirectly at any of its workplaces the right to work in dignity and in an environment that is safe and in compliance with all applicable legislation.
- Respectful treatment of ethnic minorities and indigenous peoples in the areas in which it does business, as well as promotion of open dialogue that includes different cultural frameworks.
- Respect for the environment.

## RELATION WITH INTEREST GROUPS

Regarding the implication of Solaria's interest groups in relation to observance of human rights, the following must be considered:

- a. Workforce: Solaria's employees are required to strictly observe human rights as recognized under applicable legislation, benchmark standards and the Company's rules and policies in the course of their activities in all countries in which it operates. In particular, the employees are required to safeguard compliance with this policy and with the regulatory framework of human rights. All of Solaria's employees are expected to act as a first line of defense of human rights by reporting through the Company's dedicated channels of communication any possible impact of non-compliance in such matters or any others related to Solaria's corporate policies.

- b. Suppliers: The Group's suppliers must also strictly observe in the course of their activities all human rights recognized under domestic and international legislation. Solaria believes that its suppliers are a key ally as regards compliance with this policy. To this end, the Company maintains a Suppliers' Code of Ethics that addresses compliance with human rights and applicable legislation, requiring its suppliers to observe the provisions of the code.

## DISCLOSURE AND COMPLIANCE

Solaria and its employees must understand, accept and comply with this Human Rights Policy.

The policy will be made available to all employees of Solaria Group and to all the Company's interest groups through its corporate website: [www.solariaenergia.com](http://www.solariaenergia.com)

The policy will be the subject of any communication and training initiatives that are considered necessary to ensure that is known and understood.

Solaria may take any actions it considers necessary to verify compliance with all the provisions of this policy.

Solaria's Board of Directors, through the Ethics, Compliance and ESG Commission, is in charge of approval of this policy and of supervision and periodic evaluation of its implementation.

Solaria has established a channel for all employees and third parties to submit doubts and suggestions and to report any unethical or illegal conduct of which they may be aware:

[canalcompliance@solariaenergia.com](mailto:canalcompliance@solariaenergia.com)

## RELEASE AND COMING INTO EFFECT

This document was approved by Solaria's Board of Directors on 13 May 2021 and was released the next day.