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Solar Industry Commitment to Environmental & Social Responsibility

Declaration of Support

Date: March 20, 2024

Nova Solar, Inc. (Company Name) is committed to continuous progress of environmental and social responsibility in the solar industry. As part of this on-going commitment, Nova Solar, Inc. (Company Name) and its solar affiliates (hereinafter the "Participant") will participate in the Solar Energy Industries Association (SEIA®) Solar Commitment ("Solar Commitment") to environmental and social responsibility.

The Solar Commitment is a voluntary commitment and details a set of solar industry guidelines which promote environmental and social responsibility. These guidelines include solar-specific and general provisions regarding the human rights, energy & the environment, worker safety, labor, ethics, health and safety, management practices and other topics. Participant commits to join SEIA's efforts towards environmental and social responsibility by meeting the following provisions:

1. **Implementation and Education:** Participant shall share the Solar Commitment expectations with direct employees and suppliers who are identified by Participant as being key to Participant's products and services, and who collectively represent a majority of Participant's solar-related expenditures. Participant shall also actively take part in the development and deployment of education related to the Solar Commitment for their direct employees and core suppliers.
2. **Reporting and Transparency:** Participant agrees to report annually on the key performance indicators (KPIs). Participants agree that results from the KPIs can be posted to the SEIA

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website to enhance the accountability of the solar industry and to encourage continuous improvement.

3. **Continuous Improvement:** Participant agrees to a good faith effort towards evaluation and continuous improvement of the best practice provisions within the Solar Commitment, including any corrective actions identified.
4. **Future development:** Participant acknowledges that the Solar Commitment is a living document which will undergo review every other year and agrees to work with the SEIA Environment and Social Responsibility Working Group should any changes be made to the Solar Commitment expectations and KPIs, including minor changes if presented.

Participant submits this letter of intent signed by an executive level representative showing intent to faithfully adhere to the Solar Commitment.

Please return signed letter to Evelyn Butler, VP of Technical Services, at ebutler@seia.org.

Company Name: Nova Solar, Inc.

Name: Barklie Estes

Title: President

Date: 03/20/2024

Signature: Barklie Estes

APRIL 2021

Solar Industry Commitment to Environmental & Social Responsibility

Participant Handbook

www.seia.org

Solar Energy Industries Association®

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Introduction

This handbook covers the important information and approaches that a solar company (also referred to as a "Participant") incorporates to embody the Solar Industry Commitment ("Solar Commitment") to Environmental & Social Responsibility. The handbook will help Participants understand the importance of the Solar Commitment as well as the roles and responsibilities of each Participant in upholding these principals as they conduct their business in deploying and supporting the market growth and use of solar as a global, green, and renewable energy resource around the world.

Definition of Terms

Continuous Improvement means that a Participant has an ongoing effort to evaluate and improve the company and any suppliers' implementation and conformance to the Solar Commitment.

SEIA working groups refers to the relevant SEIA member committees or working groups that include topics relevant to sustainability, environmental, health, safety, and social responsibility initiatives for our industry.

Supply chain network are the suppliers who the Participant manages directly and who provide products, components or services that are critical to the Participant's solar business.

Founding Year is the first year of the Solar Commitment (2012), in which the KPIs and other supporting tools will be developed.

Good faith effort means that Participants must show a good faith commitment and action towards the Solar Commitment, implementation of key principals of the Solar Commitment, and the KPIs and tools that measure and support their success in achieving their goals.

Key Performance Indicators (KPIs) are a set of specific and material metrics that SEIA, ifs staff and its members, including those of the relevant committee or working groups have developed and agreed are necessary measure to constitute a Participant's ability to sign on and be part of the Solar Commitment, which includes a requirement that Participants will report their progress annually in each KPI area.

Participant is a legal entity or organization in the solar industry that has agreed to incorporate and enact the Solar Commitment requirements and has been formally acknowledged as a Participant by SEIA.

About SEIA

The Solar Energy Industries Association® (SEIA) is leading the transformation to a clean energy economy, creating the framework for solar to achieve 20% of U.S. electricity generation by 2030. SEIA works with its over 1,000 member companies and other strategic partners to fight for policies that create jobs in every community and shape fair market rules that promote competition and the growth of reliable, low-cost solar power. Founded in 1974, SEIA is the national trade association for the solar and solar + storage industries, building a comprehensive vision for the Solar+ Decade through research, education and advocacy. SEIA is a 501c(6) non-profit association.

SEIA and Efforts for Sustainability, Environmental, Health, Safety, and Social Responsibility

SEIA has developed several efforts to address sustainability, environmental, health, safety, and social responsibility topics in the solar industry, which we refer to collectively as the "Solar Commitment". These groups include but are not limited to: Corporate Social Responsibility Committee, the Codes & Standards Working Group, the PV Recycling Working Group, the Operations and Maintenance Working Group, the Quality Assurance Working Group, and the Installer Safety & Workforce Development Working Group. These member groups address sustainability, environmental, health, safety and social responsibility, related topics of the solar industry.

The **Corporate Social Responsibility Committee** addresses items of corporate social responsibility such as sustainability, labor and environment health and safety. This group was instrumental in developing the original versions of the Solar Commitment and helping to define the scope of the following working groups.

The **Codes & Standards Working Group** reviews all solar-related building, fire and energy codes and the related product standards. The staff leads, with member guidance and input through additional subgroups or task groups, advocate on behalf of the SEIA membership in the relevant codes and standards forums. For example, SEIA has submitted comments on several cycles of the National Electrical Code, the International Code Council model codes, and several standards such as the American Society of Civil Engineers' 7-16, the solar standards of safety published by UL and many others.

The **PV Recycling Working Group** covers policy and practical circular economy approaches. For instance, with the SEIA staff lead who administers the SEIA PV National PV Recycling program, which includes evaluating and developing partner recycling companies for PV modules, inverters, and other Balance of Systems equipment, the members provide guidance and input into the selection of recyclers eligible to be SEIA partners. Similarly, the working group discusses, determines, and advocates on policy input, draft language and provides testimony related to end-of-life management (which includes recycling, refurbishment, and resale) in the U.S. The group also monitors lifecycle and end-of-life activities and approaches through Asia and Europe.

The **Installer Safety & Workforce Development Working Group** is focused on reviewing federal safety regulations and disseminating information regarding safety best practices. The Working Group addresses and any changes or updates in safety information and proper application of federal and state regulations. Additionally, the group identifies and provides advice on any workforce development related activities.

SEIA's **Quality Assurance Working Group** develops best practices for different segments of solar application to share information regarding quality-oriented approaches so that installers and developers can learn more about high-quality practices that contribute to better quality installations that last longer and align with the project goals. In 2018, the working group published the SEIA Best Practices for Residential Installations. Later in 2021, SEIA plans to publish the SEIA Best Practices for Commercial & Industrial Installations.

Lastly, SEIA's **Operations & Maintenance Working Group** covers the post-commissioning activities still

necessary to ensure the project meets its expected goals and objectives. This includes identifying and standardizing how operational and preventive maintenance are defined, how expectations are communicated and to help socialize more consistent language in contracts and service descriptions. Similarly, the group is made aware of and provides feedback on practices which may affect them but are the main topics of other member working groups, such as the recycling program and practices.

About the Solar Commitment

SEIA is committed to the continuous progress of advancing the Solar Commitment throughout the solar industry and those organizations involved in the complete solar value chain. Participants must regard these principles as applicable to their entire supply chain network, relevant to all organizations who participate in the solar industry.

The Solar Commitment defines common practices and expectations for all solar industry participants, including manufacturers, suppliers, subcontractors, and customers in the solar value chain. At a minimum, a Participant shall require its next tier suppliers to comply with the principles identified herein.

Joining the Solar Commitment can benefit solar energy industry companies through:

Enhanced Credibility

Signing on to the Solar Commitment shows a clear commitment to the issues, which enhances credibility and trust with investors, customers, and regulators, all of whom are increasingly looking for broad, objective measures of sustainability.

Furthered Efficiency and Innovation

Participation will help provide a roadmap for planning and resource allocation that will steer the company towards enhanced resource utilization, shared value, and governance. Fundamentally, this is a management tool aimed to build capacity for the company and its suppliers alike to more strategic and cost-effective approaches and execute sustainable business practices.

Strengthened Industry Influence

Participation "brings the company to the table," allowing it to be part of essential discussions shaping the future of sustainability for solar. This may hold keys to fruitful collaboration with peers and industry networks and further increase the chances of establishing powerful cross-sector alliances.

Demonstrated Leadership in Sustainability

The Solar Commitment will help ensure the solar industry remains truly sustainable.

Continued Commitment to Improving Corporate Social Responsibility

Since its origination, the Solar Commitment has been refined over the years and will continue to explore new thinking and approaches to continually adapt as society and the definitions change over time.

Given the significant actions that have taken place in the last couple of years and particularly in 2020 with respect to anti-racism, diversity, equity, inclusivity and justice, SEIA strongly encourages Participants to review current material those areas, have organization discussions with their management and employees

about how their entity will approach any position in those specific areas. The 2021 Solar Commitment principles will not currently, in detail, address these areas as they do require more thoughtful introspection and contemplation amongst the solar industry, its workforce and its impact than can be included in this document. As such, SEIA highly encourages its member companies and industry to explore other efforts such as the Obama Foundations activities on anti-racism, justice and leadership and more specifically, SEIA's resources on Diversity, Equity & Inclusion including the SEIA Diversity Best Practices Guide for the Solar Industry. This handbook does not include provisions or other principles that directly impact these topics and the current Solar Commitment, yet that may be considered in the future.

The Solar Commitment consists of two parts:

Part 1 - Solar Specific Topics: Part 1 articulates items that are of particular interest to the solar industry and/or its stakeholders. Part 1 may include themes that are further addressed in Part 2.

Part 2 - Core Compliance: Part 2 provides a broad set of foundational expectations for sustainability. To reduce duplication, promote harmonization, and advance shared approaches, SEIA had adopted the Responsible Business Alliance ("RBA") Code of Conduct (formerly the Electronics Industry Code of Conduct ("EICC")), Version 6.0 (2018), as its core compliance standards for Labor, Health & Safety, the Environment, Management Systems, and Ethics (see appendix for more information on the use of the EICC as part of the Solar Commitment). We have also included concepts from Version 7.0 (2021) as it was just recently released.

Similarly, concepts from the UN Global Compact have also been referenced as well as some principles from relevant global impact foundations such as the Clinton Foundation, the Obama Foundation, and the Ellen MacArthur Foundation, which individually advance new thinking on some of the key initiatives incorporated in the Solar Commitment as well as in sustainability practices such as the Circular Economy approach.

The full Solar Commitment is featured later in this Handbook. The Solar Commitment is completely voluntary and there are no fees to sign on. A signature does not imply a contract nor bind your company legally or financially to strict adherence to these principles in part or in whole. Essentially, signing onto the Solar Commitment indicates your organization's willingness to embody, pursue, and/or implement in part or in whole the approaches contained herein.

Commitment Requirements for Participants

All solar industry companies committed to improving their environmental and social responsibility approaches are encouraged to adopt the Solar Commitment. SEIA membership is not required.

The Participant requirements are:

1. Entities intending to participate need to sign and submit Declaration of Support of the Solar Commitment. The letter needs to be signed by an executive-level representative and must include:
    a. **Implementation and Education:** Participant shall share the Solar Commitment expectations with direct employee, key service providers, and core suppliers who are identified by Participant as being key to Participant's products and services, and who

collectively represent a majority of Participant's solar-related expenditures in pursuit of their core and extended businesses. Participant shall also actively take part in the development and deployment of education related to the Solar Commitment for their direct employees and core suppliers.

b. **Reporting and Transparency:** Participant agrees to report annually on the key performance indicators (KPIs). Participants agree that a summary results from the KPIs can be posted to the SEIA website to enhance the accountability of the solar industry and to encourage continuous improvement.
c. **Continuous Improvement:** Participant agrees to a good faith effort towards evaluation and continuous improvement of the best practice provisions within the Solar Commitment.
d. **Future development:** Participant acknowledges that the Solar Commitment is in a revised and expanded version of implementation and agrees to work with the SEIA Corporate Social Responsibility Committee should any changes be made to the Solar Commitment and KPIs.

2. SEIA will confirm the entity's request for participation upon receiving a letter of intent or commitment including all required elements.
3. Upon confirmation, SEIA will post Participant logo on the SEIA website and the Participant will declare on the company website the support and adoption of the Solar Commitment. [We need to develop a separate logo for the Solar Commitment.]
4. The company must communicate internally the requirements of the Solar Commitment to relevant departments and organizations.
5. Progress towards compliance: Develop wording to address phased approach to compliance, particularly where concerns are for suppliers (communication, education, training, auditing, assessment, review). Also define and agree on KPIs and implementation schedule (phases / stages for implementation and compliance). At the end of the second quarter ("Q2") for the following year, SEIA will ask Participants for a completed KPI report. For example, for a Participant signing the Solar Commitment in Q2 of 2021, the KPIs must be reported in Q2 of 2022. Participants are required to report annually on the KPIs, but not on every best practice outlined in the Solar Commitment. The KPIs include: Water Consumption, Electricity Use & Purchases, Fall Protection & Electrical Safety, Waste Generation & Disposal, and Sustainability Report. Participants agree that a summary of results from the KPIs can be posted to the SEIA website to enhance the accountability of the solar industry and to encourage continuous improvement.
6. Participants must renew the intent or commitment to participate every year. The renewal letter can accompany the annual report.

Governance of the Solar Commitment

The Solar Commitment program is managed by SEIA's Corporate Social Responsibility Committee ("CSR Committee"). The CSR Committee is responsible for:

- Making recommendations (by consensus) for any changes to governance, program, or requirements of the Solar Commitment and the KPIs to the Board for consideration and vote.
- Working with the Board and SEIA staff on input, agreement, and communications to the Solar Commitment.
- Managing (with SEIA staff) the Solar Commitment program requirements including but not limited

to:

- Reviewing the KPIs for reporting every 3 years or (or as deemed necessary) through a consensus process.
- Reviewing the Solar Commitment parts 1 & 2 through a consensus process.
- Formally voicing concerns over the progress or behavior of any Participant not fulfilling program requirements.

The SEIA Board has responsibility to vote on the approval of the Solar Commitment and all elements within as proposed and presented by the CSR Committee and the SEIA staff. This includes any changes in content, program, participation, or purpose to/of the Solar Commitment.

Communicating About the Solar Commitment

SEIA acknowledges Participants publicly on the SEIA website once the Participant has submitted a company letter indicating its intent or commitment and SEIA has acknowledged the entity's participation. Participants will indicate their participation in the Solar Commitment on the Participant's website and may indicate participation in other reporting processes.

Tracking Industry and Participant Progress

SEIA is committed to an open and transparent reporting process for the KPIs. SEIA is also committed to the continuous improvement principle for Participants. Participants are required to report annually on the KPIs, but not on every best practice outlined in the Solar Commitment. Participants agree to a good faith effort towards evaluation and continuous improvement of the best practice provisions within the Solar Commitment.

SEIA believes that transparency is one of the fundamental tools to show an entity's commitment and progress toward implementing the Solar Commitment. SEIA understands that Participants will be at different levels of implementation. To demonstrate continuous improvement, Participants have up to three years from the date of the letter of intent or commitment to fully comply and report on all Key Performance Indicators.

SEIA will report annually on the Solar Commitment and industry's progress, with indication of challenges, learnings and other observances.

Role of Audits in the Solar Commitment

To drive accountability and verification of Participants and their suppliers' practices, SEIA recommends that Participants develop auditing processes or that they integrate Solar Commitment requirements into their existing auditing practices. See the "Resources" section for examples of sustainability auditing programs and agencies.

Grievance Policy

1. If SEIA receives any claim from a third party regarding potential non-compliance to the Solar Commitment by a Participant, SEIA will immediately inform the identified Participant of the allegations.

2. SEIA will then conduct preliminary review to research the allegations. If, based on this review, the allegations appear to have merit, SEIA will require the identified Participant to:
    a. Investigate the legitimacy of the claim.
    b. Identify primary issues of the claim and any corrective action needed.
    c. Instigate corrective action, as necessary.
    d. Report to SEIA what corrective action took place and when it was completed.

SEIA will report annually on any corrective actions instigated through third party claims.

Reviewing the Solar Commitment Program

The Solar Commitment Program will be reviewed every three years [from the publication date] by the CSR Committee. In the interim, the CSR committee may propose, make, and recommend changes to the program as needed. Specifically, the CSR Committee will review the Solar Commitment language and KPIs for continued applicability as well as the Reporting and Grievance processes. Feedback from the Participants will be accounted for in the review process. Any changes or proposed revisions shall be presented to the SEIA Board for consideration and approval.

The Solar Industry Commitment

The solar energy industry provides a sustainable solution to customers by producing energy with low greenhouse gas impacts. This improves energy security and creates jobs and increases economic development. Harnessing the energy from the sun, the solar energy industry has always been viewed as a clean and green solution to meeting energy demands. The solar energy industry also has a responsibility to mitigate and manage its full range of social and environmental impacts, which include respecting the human rights of workers, ensuring that the rights of communities and other stakeholders are respected, and making business operations safe and environmentally responsible.

Taking this responsibility seriously is essential for advancing several strategic aims for individual solar companies as well as the industry as a whole:

- To gather the broad support needed from customers, investors, communities, government agencies, and media to enable the sector's growth,
- To position the growing sector for integrating the most efficient and effective approaches to sustainability management; and
- To establish a generally accepted measurement framework that allows industry companies to differentiate themselves through investments which are transparent, credible, and comparable.

To advance comprehensive sustainability performance of the solar industry in support of the above aims, SEIA has developed the Solar Commitment.[1] The Solar Commitment defines common practices and expectations for all solar industry participants, including manufacturers, suppliers, subcontractors, and customers in the solar value chain.

[1] The Solar Commitment is not intended to create new and additional third-party rights, including for workers.

By adopting the Solar Commitment, a company will publicly declare its support and implement the practices articulated, and thus will become a participant ("Participant"). A Participant shall, at a minimum, require its next tier suppliers to acknowledge receipt to the Participant and strive to meet the Solar Commitment.

In addition to implementing the Solar Commitment, Participants, in all their activities, must operate in full compliance with the laws, rules and regulations of the countries in which they operate. However, the Solar Commitment encourages Participants to go beyond legal compliance, drawing upon internationally recognized standards, to advance social and environmental responsibility. As part of the Solar Commitment, it is expected that participants will develop transparent processes for communication with key stakeholders on relevant social and environmental impacts. In addition, Participants should commit to identifying best practices on emerging issues through industry dialogue, raising awareness about them, and advancing continuous improvement over time.[2]

SEIA is committed to ongoing engagement with the industry and stakeholders in the continued development, improvement, and implementation of the Solar Commitment.

In no case can complying with the Solar Commitment violate local laws. If, however, there are differing standards between the Solar Commitment and local law, SEIA defines conformance as meeting the strictest requirements. In alignment with the UN Guiding Principles on Business and Human Rights, the provisions in this Code are derived from key international human rights standards including the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work[2] and the UN Universal Declaration of Human Rights[3].

Part I: Solar Specific Topics

1. Human Rights

In accordance with the United Nations Global Compact, which draws from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption, Participants are expected to operate with respect for human rights and establish appropriate policies and processes to avoid infringement on human rights through Participant operations or business relationships. Participant should track and make available to relevant stakeholders, relevant information on their human rights performance. Compliance with U.S. laws statement as well should be mentioned (which are emerging as more stringent that the international laws).

2. Electrical and Fire Safety

Participants must comply with electrical design and installation standards (e.g., the IEC, ANSI, UL, the

[2]ILO Declaration on Fundamental Principles and Rights at Work, main webpage: https://www.ilo.org/declaration/lang--en/index.htm; actual text: https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm

[3] United Nations Universal Declaration on Human Rights: https://www.un.org/en/universal-declaration-human-rights/

National Electrical Code, and similar, relevant requirements as required by federal law, state law or policy and / or local ordinance) to ensure electrical and fire safety, for all solar systems as installed, including for interconnection to the electrical grid, for stand-alone or off-grid use and for mobile or other applications to provide solar-generated energy to the user.

3. Energy and Environment

Participants should actively work to reduce the consumption of natural resources including raw materials, water, and energy taking into consideration the entire product lifecycle from raw material sourcing through end-of-life management including disposal, reuse, refurbishment, or other energy-generation-related usage. Scrap materials, residuals materials, and end of life products should be responsibly managed by next-tier service providers or buyers.

Key environmental impacts of manufacturing processes, product technology or key business operations should be identified, and appropriate controls should be used to minimize these impacts including tracking water use, energy use, and related greenhouse gas emissions, while maximizing energy efficiency throughout business operations. Participants should make available to relevant stakeholders the necessary information[4] on these processes and activities.

Include more information and detail about PV reuse, refurbishment, and recycling (in particular) and the cooperation / collaboration with stakeholders, including regulators about how industry will manage this area.

SEIA recommends solar companies to review and determine how they can make more diligent efforts towards the concepts of a Circular Economy approach; in particular, SEIA recommends that you review the information available on the Ellen MacArthur Foundation website.

4. Fall Protection and Worker Safety

Participants must comply with all applicable federal, state, and local fall prevention requirements and worker safety provisions including, as relevant, fall prevention safety plans, training, monitoring, mitigation activities, corrective action plans as well as any additional activities to eliminate fall risk.

5. Reporting Misconduct

If a supplier[5] believes that anyone acting on behalf of the company requesting adherence to the Solar Commitment is engaged in illegal or unethical conduct; the supplier should report this to the Participant company and if needed, to SEIA. A good-faith report of suspected misconduct will not adversely impact the supplier.

6. Steel Sourcing

Consideration should be given to responsible steel sourcing practices, including any preferences for reclaimed/recycled steel or other steel product types that can improve the supply chain for environmental

[4] Initial priority topics include (1) installation, (2) materials and chemical use, and (3) lifecycle energy impacts.
[5] Supplier is defined as a company who is asked to provide a product or service for the company requesting adherence to the Solar Commitment.

or social responsibility purposes. Participants should seek out and consider applying standards published which can assist with procedures or practices that encourage responsible steel sourcing guidelines through its supply chain. Such considerations should include key raw materials.

Part II: Code for Core Compliance

1. Diversity, Equity, Inclusion and Justice

SEIA values diversity, inclusion and equity within our organization and the promotion of these values across the solar industry. We define diversity to include — but not be limited to — difference by race, ethnicity, religion, gender, gender expression, sexual orientation, age, culture, ability, class, employment level, and political identity. SEIA's definition of diversity is evolving and subject to expansion.

To that end, Participant's should reference SEIA's *Diversity Best Practices Guide for the Solar Industry*[6] and identify which, if not all, of the Best Practices in each of the Key Focus Areas they will implement and report on as part of their identified KPI's. For reference, the Key Focus Areas are listed here with a brief description:

- **Set the Bar** - Companies should start by setting a realistic vision for diversity and inclusion based on one of three approaches: Basic, Competitive or World Class. That vision can be set based on a cultural audit, or other review of where the Participant organization stands.
- **Obtain Buy-in** - Participants should identify diversity and inclusion as core values with specific goals in place to ensure continued growth. These organizations must build programs, policies and structures in a way that establishes responsibility, accountability, and shared values for advancing diversity and inclusion goals.
- **Assess Current State** - To implement best practices to enhance diversity and inclusion, Participants should collect baseline information needed to understand the current state of diversity and inclusion in their workplace. This is not necessarily a demographic assessment, but instead should include a cultural assessment across three dimensions of the organization.
- **Close the Demographic Gap** - To close the demographic gap, Participant should focus on six areas: Outreach, Recruitment, Interviewing and Hiring, Retention, Upward Mobility and building a Culture of Inclusion. SEIA's Guide provides Best Practices information for each of these critical areas. Indicators of progress will include increased employee productivity, increased employee morale, increased employee satisfaction and decreased employee turnover.
- **Continuously Improve** - The most successful diversity and inclusion programs are developed to continuously measure success. Metrics are built into the program tools and processes to provide the data they will need to assess success and guarantee support for the long term.

2. Labor

Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. The recognized standards, as set out in the annex were used as references in preparing the Commitment and may be a useful source of additional

[6] Solar Energy Industries Association and The Solar Foundation, *Diversity Best Practices Guide for the Solar Industry*, May 2019, https://www.seia.org/sites/default/files/2019-05/SEIA-TSF-Diversity-Best-Practices-Guide-2019-final.pdf, Accessed April 27, 2021

information.

The labor standards are:

1) Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

There shall 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 company-provided dormitories or residential facilities.

As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. The written employment agreement may be electronic and must have acknowledged receipt by the worker. For countries where multiple languages may be present, the written employment agreement must be in a language which the worker understands the terms and acknowledges that comprehension.

Employment must be voluntary and of the employee's own work volition.[7] and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, such as government-issued identification, passports, or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or 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.

All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

2) Child Labor Avoidance and Compliance with Young Worker Safety

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported.

Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their

7 Work volition is defined as "the perceived capacity to make occupational choices despite constraints". Ryan D. Duffy, Matthew A. Diemer, Justin C. Perry, Cathy Laurenzi, Carrie L. Torrey, The construction and initial validation of the Work Volition Scale, Journal of Vocational Behavior, Volume 80, Issue 2, 2012, Pages 400-411, ISSN 0001-8791, https://doi.org/10.1016/j.jvb.2011.04.002 ; https://www.sciencedirect.com/science/article/pii/S0001879111000492 ; Accessed April 27, 2021

health or safety, including night shifts and overtime. Participant shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Participant shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, who may be interns or apprentices above the young workers age, shall be at least the same wage rate as other workers performing equal or similar tasks.

3) Working Hours

Studies[8] of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness.

Workweeks are not to exceed the maximum set by local law.

Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations.

Workers shall be allowed at least one day off per seven-day work week; if the regular work week is defined differently and as allowed by national, federal, or local state law, then the time off may be calculated differently to accommodate the work week definition. Reference the RBA's Validated Assessment Program's Operations Manual[9] for further guidance on work week calculation.

4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

In compliance with local laws, hourly workers shall be compensated for overtime at pay rates greater than regular hourly rates.

Deductions from wages as a disciplinary measure shall not be permitted unless allowed locally by law; in such cases, the specific deductions must be substantiated, shown why allowed by law and communicated with the employee, including the circumstances in which such deductions are allowed. Such communication does not indicate agreement by the employee, who retains their right to appeal or otherwise seek legal remedies against such deductions.

For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify its accuracy in compensation for the work performed.

5) Humane Treatment

The Participant's disciplinary policies and procedures shall be clearly defined and communicated to workers. There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse,

[8] The Effect of Long Working Hours and Overtime on Occupational Health: A Meta-Analysis of Evidence from 1998 to 2018, Wong, Chan and Ngan, published June 13, 2019, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6617405/pdf/ijerph-16-02102.pdf Accessed April 27, 2021.

[9] Responsible Business Alliance, RBA Validated Assessment Program (VAP) Operations Manual, Version 7.0.0, published January 2021. https://www.responsiblebusiness.org/media/docs/WorkingHoursGuidance.pdf Accessed April 27, 2021.

corporal punishment, mental or physical coercion or verbal abuse of workers: nor is there to be the threat of any such treatment or any such behavior or action that produces a hostile work environment in violation of applicable national, federal, or local laws. Disciplinary policies and procedures shall be clearly defined, documented, and communicated to workers including any updates or changes in the future.

6) Non-Discrimination

Participants should be committed to a workforce free of harassment and unlawful discrimination.

Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

Workers shall be provided with reasonable accommodation for religious practices, individuals with a disability and as identified by local or national laws. Consideration should be given to such reasonable accommodation if related to a requirement for the job/functions and duties, such as changing rooms or areas for necessary uniforms like cleanroom suits or Personal Protective Equipment. Additional consideration should also be given for changing rooms and / or restrooms to accommodate worker privacy.

In addition, workers or potential workers should not be subjected to medical tests, vaccinations, or physical exams that could be used in a discriminatory way.

7) Freedom of Association

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Participants are to respect the rights of workers to associate freely, join or not join labor unions, seek representation, join workers' councils in accordance with local laws. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

3. Health and Safety

Participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.

The health and safety standards are:

1) Occupational Safety

Worker exposure to potential safety hazards (e.g., electrical, and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering, and administrative controls, preventative maintenance, and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Workers be encouraged to raise safety concerns and shall

not be disciplined for raising safety concerns. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.

2) Emergency Preparedness

Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans shall include the focus of minimizing harm to life, the environment and property.

3) Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and e) facilitate return of workers to work.

4) Industrial Hygiene

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through prior design, engineering, and administrative controls. . When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs. Protective programs shall include educational materials about the risks associated with these hazards.

5) Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

6) Machine Safeguarding

Production and other machinery is to be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

7) Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Participant or a labor agent are to be maintained clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, and adequate lighting, heat and ventilation and reasonable personal space along with reasonable entry and exit privileges.

8) Health and Safety Communication

Participant shall provide its workers with the appropriate workplace health and safety training in their language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire and physical

hazards. Health and safety information shall be clearly posted in the work facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns and not fear or experience any retaliation or reprisal for so doing.

9) Health and Safety with respect to Transmittable Viruses such as COVID-19

The rapidly evolving COVID-19 pandemic impacts businesses in a variety of ways. Solar companies will face unique challenges due to their nature of their on-site work or in factories that may involve interactions with co-workers, customers, and suppliers. National governments have published information on expectations and requirements with respect to providing workers with remote-based work opportunities, safety measure and guidelines in the workplace, including social distancing, the provision of proper Personal Protection Equipment such as facial masks, hand sanitizer, cleaning procedures for work surfaces that other similar considerations. Participant shall adhere to the expected guidance and requirements as indicated by their respective national, federal, provincial, state, or local health authorities' requirements to protect workers and others from the spread of transmittable viruses or diseases and to protect their customers, suppliers or other on-site personnel, visitors, or other stakeholders.

For example, the U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) published "Guidance on Preparing Workplaces for COVID-19"[10] to help companies respond in the event of coronavirus in the workplace. The guidance was developed in collaboration with the U.S. Department of Health & Human Services (HHS). The document provides practical guidance for preventing the spread of COVID-19, also known as novel coronavirus, and contains information on safe work practices and appropriate personal protective equipment based on the risk level of exposure.

4. Environmental Responsibility

Participants recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

Recognized management systems such as ISO 14001, the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

The environmental standards are:

1) Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

2) Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance,

[10] U.S. Department of Labor, Occupational Safety and Health Administration (OSHA), *Guidance on Preparing Workplaces for COVID-19*, https://www.osha.gov/sites/default/files/publications/OSHA3990.pdf; Accessed April 27, 2021.

and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved or by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

3) Hazardous Substances

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

4) Solid Waste

Participant shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Participant shall conduct routine monitoring of the performance of its air emission control systems.

6) Material and Product Content Restrictions

Participants are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

7) Water Management

Participant shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water, and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Participant shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8) Energy Consumption and Greenhouse Gas Emissions

Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Participants are to look for cost- effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions. At a minimum, Participant shall comply with federal law, state law and local ordinance governing requirements and adherence to energy code provisions and requirements.

SEIA also encourages, but does not require as part of the Solar Commitment, that entities explore additional principles and efforts to combat climate change such as the Clinton Climate Initiative through the Clinton Foundation which supports developing countries in climate-challenging environments, provides opportunities for training, jobs and other key community-sustaining initiatives. Support of such initiatives can also provide opportunities to exceed the requirements of the Solar Commitment.

5. Management System

Participants shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to the participant's operations and products; (b) conformance with this

Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

1) Company Commitment

Corporate social and environmental responsibility policy statements affirming Participant's commitment to compliance and continual improvement, endorsed by executive management. This statement should reference the company's signing of the Solar Commitment and the entity's desire to strive to meet the principles described herein.

2) Management Accountability and Responsibility

The Participant clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

3) Legal and Customer Requirements

Identification, monitoring and understanding of applicable laws, regulations, and customer requirements.

4) Risk Assessment and Risk Management

A process to identify the environmental, health and safety[11] and labor practice and ethics risks associated with Participant's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5) Improvement Objectives

Written performance objectives, targets and implementation plans to improve the Participant's social and environmental performance, including a periodic assessment of Participant's performance in achieving those objectives.

6) Training

Programs for training managers and workers to implement Participant's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

7) Communication

A process for communicating clear and accurate information about Participant's policies, practices, expectations and performance to workers, suppliers, and customers. This communication may also include the entities signing of the Solar Commitment and the entity's desire to strive to meet the principles described herein.

8) Worker Feedback and Participation

Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and

[11] Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.

obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.

9) Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

10) Corrective Action Process

Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

11) Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

12) Supplier Responsibility

A process to communicate the Solar Commitment and the entity's desire to strive to meet the principles described herein, and the Participant's requirement that its supply chain network also adhere to the principles of the Solar Commitment and its intention to monitor compliance to the Solar Commitment.

6. Ethics

To meet social responsibilities and to achieve success in the marketplace, Participants, and their agents are to uphold the highest standards of ethics including the principles outlined below.

Similarly, SEIA strongly urges Participants to review available reports and resources that reflect the study and research of related social risks in the supply chain of the solar industries components and raw materials. One example is the "Responsible and sustainable sourcing of battery raw materials"[12] published by the European Commission.

1) Business Integrity

The highest standards of integrity are to be expected in all business interactions. Participants shall have a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, and embezzlement. All business dealings should be transparently performed and accurately reflected on the Participant's business books and records. Monitoring and enforcement procedures shall be implemented to ensure conformance with anti-corruption laws.

2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

[12] Mancini, L., Eslava, N., Traverso, M. and Mathieux, F., Responsible and sustainable sourcing of battery raw materials, EUR 30174 EN, Publications Office of the European Union, Luxembourg, 2020, ISBN 978-92-76-17950-4 (online), doi:10.2760/562951 (online), JRC120422

3) Disclosure of Information

Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4) Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer and supplier information is to be safeguarded.

5) Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld, including consideration of those guidelines issued by SEIA with respect to Consumer Protection and similar provisions that may be found in other country markets. Any rules or regulations required by national, federal, state, and local governments will be strictly adhered to at a minimum.

6) Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers[13] are to be maintained, unless prohibited by law. Participants should have a communicated process for their personnel and workers to be able to raise any concerns without fear of retaliation or reprisal.

7) Responsible Sourcing of Minerals

Participants shall have a policy to reasonably assure that the tantalum, tin, tungsten, cobalt, and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Participants shall exercise due diligence on the source and chain of custody of these and other potential minerals mined or resourced in such conditions. Participants should make their due diligence measures available to customers upon request.

8) Privacy

Participants are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees as required by law. Participants are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Additional Notes

The RBA Code provides guidelines for performance and compliance with critical CSR policies that it advocates that many businesses, regardless of industry, abide. The RBA Code was developed through a its member-based consensus process and is now being used by over 40 well-known ICT brands and over 1000

[13] Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

of their suppliers, and it has been translated into 26 languages.[14] In order to minimize duplicity and use language that participants and stakeholders are familiar with, we have leveraged the RBA framework as a basis for the SEIA statement, and added unique issues for solar as are pertinent. We understand that the RBA Code is likely to evolve in the future, and we intend to take its advances under consideration as the SEIA statement evolves. In addition, according to the RBA website, "*Version 7.0 of the Code of Conduct went into effect on January 1, 2021. Version 7.0 can be viewed here in English and below in multiple languages. In case of any translation [discrepancies], the English version takes precedent.*"[15]

The following standards were used to develop the current Solar Commitment and may be a useful source of additional information; similarly, the footnotes referenced in the document may also be referenced.

The following additional documents and standards may or may not be endorsed by each Participant. The following standards were used in preparing this Code and may be a useful source of additional information.

- Dodd-Frank Wall Street Reform and Consumer Protection Act http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf
- Eco Management & Audit System http://ec.europa.eu/environment/emas/index_en.htm
- Ethical Trading Initiative www.ethicaltrade.org/
- ILO Code of Practice in Safety and Health www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf
- ILO International Labor Standards www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm
- ISO 14001 www.iso.org
- National Fire Protection Association www.nfpa.org/catalog/home/AboutNFPA/index.asp
- NSF International "*Sustainability Leadership Standard for PV Modules*", published by as NSF 457.
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas http://www.oecd.org/corporate/mne/mining.htm
- OECD Guidelines for Multinational Enterprises http://www.oecd.org/investment/mne/1903291.pdf
- OHSAS 18001 http://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/
- Universal Declaration of Human Rights www.un.org/Overview/rights.html
- United Nations Convention Against Corruption https://www.unodc.org/unodc/en/treaties/CAC/
- United Nations Global Compact www.unglobalcompact.org
- United States Federal Acquisition Regulation www.acquisition.gov/far/
- SA 8000 http://www.sa-intl.org/index.cfm?fuseaction=Page.ViewPage&PageID=937
- Social Accountability International (SAI) www.sa-intl.org

Frequently Asked Questions

[14] See Responsible Business Alliance, Code of Conduct Version 7.0, http://www.responsiblebusiness.org/media/docs/RBACodeofConduct7.0_English.pdf Accessed April 27, 2021
[15] http://www.responsiblebusiness.org/code-of-conduct/

Participation

What does it mean to participate? Participants must adhere to certain requirements. Please see the "Commitment Requirements for Participants" section for more details.

What are the reporting requirements? Please see the "Commitment Requirements for Participants" section for more details.

What kinds of organizations can participate? The Solar Commitment is open to any entity in the solar value chain.

How much does it cost? There is no participation fee currently.

Do I have to be a SEIA member to participate? Any entity is encouraged to use the Solar Commitment for improving environmental and social responsibility; SEIA will only publicly recognize entities that have agreed to the Participation requirements in the Solar Commitment program. A company does not need to be a SEIA member to participate.

Are SEIA members required to participate in the Solar Commitment program? No. Participation in the SEIA Commitment is voluntary. However, SEIA encourages all members and entities in the solar value chain to participate.

Can entities adopt the Solar Commitment without Participating in the Program? The Solar Commitment is a public document and may be used by any entity to progress social and environmental responsibility in the supply chain. However, only Participants will be recognized by SEIA and acknowledged on the SEIA website.

The Solar Commitment

When did SEIA originally adopt the Solar Commitment? The SEIA Board of Directors adopted the original Solar Commitment on December 14, 2011.

What is the scope of the Commitment? Solar-specific provisions include Human Rights, Electrical Safety, Energy and Environment, Fall Protection, and Reporting Misconduct. Provisions adopted from the RBA include Labor, Health and Safety, Ethics, Environment, and Management Systems.

Are audits required to participate in the Solar Commitment? SEIA recommends that Participants have auditing as an integral part of all supply chain management programs.

Who was involved in developing the Solar Commitment? SEIA's original Environment, Health & Safety Committee, and External Stakeholders: Natural Resource Defense Council, Silicon Valley Toxics Coalition, Boston Common Asset Management, As You Sow, PG&E, Fotowatio, European Photovoltaic Industry Association, and the EU Joint Research Center were involved in the original document. For this newer document version, SEIA staff revised and updated the document, shared with the CSR Committee and SEIA's current board members.

Do Participants need to communicate this to their suppliers? Yes - Participants agree that the Solar Commitment is communicated and agreed-upon with supply chain network. We encourage those suppliers

to also communicate and implement the Solar Commitment further down the supply chain. Please see the "Communicating About the Solar Commitment" section for more details.

How is this similar or different from existing supply chain initiatives such as the RBA? SEIA has consulted with internal and external stakeholders on how to drive continuous progress of supply chain social and environmental responsibility. Out of these discussions it became clear that: 1) leveraging existing commitments and deriving lessons from other organizations is critical to progressing standards consistently; 2) there is a need to prevent 'reinvention of the wheel;' and 3) issues for the solar industry need also to be addressed. Thus, the Solar Commitment leverages the RBA code to progress relevant and familiar standards, while addressing some topics specific to the solar industry. In addition, SEIA has committed to drive behavior through a transparency model, drive Participant ownership for Solar Commitment implementation, and to provide leadership on transparency for the industry.

Key Performance Indicators

Are Participants required to prove implementation of the Solar Commitment? Participants are required to report on the KPIs and strive towards continuous improvement of the best practice provisions of the Solar Commitment. Please see the "Commitment Requirements for Participants" section for more details.

Who was involved in creating the key performance indicators? SEIA's CSR Committee along with the multi-stakeholder Advisory Board created the KPIs. Please see the "Governance of the Solar Commitment" section for more details.

When and how often do Participants report against their indicators and to whom? At the end of Q2 for the following year after signing the Solar Commitment, SEIA will ask Participants for a completed KPI report. For example, for a Participant signing the Solar Commitment in 2021, the KPIs must be reported in Q2 of 2022. Participants are required to report annually on the KPIs, but not on every best practice outlined in the Solar Commitment. Participants agree that their reports will be aggregated and anonymized from all Participants' KPIs as an industry benchmark and will be posted to the SEIA website and / or referenced in other documentation or presentations to enhance the accountability of the solar industry and to encourage continuous improvement.

General

Who should I contact for more information? Evelyn Butler (ebutler@seia.org), Amir Yazdi (ayazdi@seia.org) or John Smirnow (jsmirnow@seia.org).

Where can I get more information on the RBA Code of Conduct? The RBA Code of Conduct and all relevant guidance materials are available through the RBA website: http://www.responsiblebusiness.org/code-of-conduct/

Governance

Does the Solar Commitment include a grievance mechanism? SEIA has developed a process for handling grievances by third parties and/or other Participants. Please see the "Grievance Policy" section for more details.

Who is part of the CSR Committee and what are the main roles/responsibilities of the Advisory Group? The CSR Committee will be convened based on request by the SEIA Board.

What will be the process for changing requirements to the Solar Commitment language, the KPIs, or for changing implementation practices? The CSR Committee and the SEIA Board, along with SEIA staff will develop a process for continually updating the Solar Commitment and accompanying processes.

What if a Participant repeatedly violates the Solar Commitment or has egregious violations? SEIA's CSR Committee is responsible for formally voicing concerns over the progress or behavior of any Participant not fulfilling Program Requirements for consideration and vote. SEIA's Board may remove any Participant from the program for a serious violation of Solar Commitment responsibilities.

SEIA Document Version History

Solar Industry Commitment to Environmental & Social Responsibility: Participant Handbook, published April 29, 2021.

Solar Industry Commitment to Environmental & Social Responsibility Handbook, published January 30, 2012.