

Solon India Private Limited



Supplier Code of Conduct

September 2023

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List of Acronyms

SIPL	SOLON India Pvt Ltd
EPC	Engineering Procurement Construction
FCPA	Foreign Corrupt Practices Act
UNCAC	United Nations Convention against Corruption
PPE	Personal Protective Equipment
EPA	Environmental Protection Agency
SDGs	United Nations Sustainable Development Goals
ILO	International Labour Organization
OSHA	Occupational Safety and Health Administration
EEOC	Equal Employment Opportunity Commission
GDPR	General Data Protection Regulation
GRI	Global Reporting Initiative

1. Introduction

1.1 Purpose of the Supplier Code of Conduct

The purpose of this Supplier Code of Conduct is to establish the fundamental principles, standards, and expectations that all our suppliers and business partners are required to adhere to when engaging with Solon India Private Limited. We believe that responsible business practices are essential not only for the success of our organization but also for the well-being of our communities and the environment. By outlining these principles, we aim to foster a sustainable, ethical, and mutually beneficial relationship with our suppliers. This Code serves as a clear and comprehensive guideline to promote integrity, sustainability, and ethical conduct throughout our supply chain.

1.2 Scope and Applicability

This Supplier Code of Conduct applies to all individuals, organizations, and entities that provide goods, services, or products to Solon India Private Limited, including but not limited to suppliers, contractors, subcontractors, consultants, and vendors. These standards apply to all aspects of our business relationships, from procurement and sourcing to project execution and delivery. Regardless of size or geographic location, all suppliers are expected to adhere to these principles and promote them within their own operations. Our commitment to responsible and ethical business practices extends to our entire supply chain, and we expect our suppliers to adopt these standards throughout their networks as well.

1.3 Commitment to Ethical Business Practices

At Solon India Private Limited, we firmly believe that ethical conduct is the cornerstone of sustainable and successful business relationships. Our commitment to ethical business practices is unwavering, and we expect the same commitment from our suppliers. This Code emphasizes the importance of honesty, transparency, and fairness in all interactions. We expect our suppliers to conduct themselves with the highest degree of integrity, avoiding any form of bribery, corruption, or unethical behaviour. By adhering to these principles, we collectively contribute to a business environment built on trust, accountability, and responsible conduct.

1.4 Communication and Compliance

Open and effective communication is vital to the success of our partnership with suppliers. We encourage an ongoing dialogue between SIPL and our suppliers to ensure mutual understanding and cooperation. Suppliers are encouraged to seek clarification on any aspect of this Code and report any concerns or violations promptly. Compliance with this Code is not optional; it is a fundamental requirement for all our suppliers. SIPL is committed to working collaboratively with suppliers to ensure understanding and compliance. We will provide resources, training, and support to help suppliers meet these standards. Violations of this Code will be taken seriously and may result in appropriate actions as outlined in the Compliance and Enforcement section of this document. Together, we can build a sustainable future based on ethical conduct and responsible business practices.

2. Our Company Values

2.1 Sustainability and Environmental Responsibility

At Solon India Private Limited (SIPL), we hold sustainability and environmental responsibility at the core of our values. We are committed to minimizing the environmental impact of our projects and operations. We expect our suppliers to share this commitment by adopting sustainable practices that reduce carbon emissions, conserve natural resources, and promote the use of renewable energy sources. Together, we aim to drive the transition to a greener and more sustainable energy future. Suppliers should not only comply with applicable environmental laws and regulations but also proactively seek opportunities to improve their environmental performance.

2.2 Safety and Health

The safety and well-being of our employees, contractors, and partners are paramount to us. We place a high value on safety and health in all our operations, and we expect our suppliers to prioritize these principles as well. Suppliers must provide a safe and healthy work environment for their employees and contractors, implementing comprehensive safety measures and practices. We encourage suppliers to proactively identify and mitigate potential hazards, conduct regular safety training, and ensure that safety protocols comply with industry standards and legal requirements. Together, we can create a work environment where safety is a shared responsibility and where accidents and injuries are prevented through diligence and care.

2.3 Integrity and Ethics

Integrity and ethical behaviour are non-negotiable aspects of SIPL's culture. We expect our suppliers to conduct their business with the highest standards of integrity, honesty, and ethical conduct. This includes avoiding all forms of bribery, corruption, and unethical practices. Suppliers should establish clear policies and procedures to prevent conflicts of interest and ensure transparent business transactions. By adhering to these principles, we aim to build trust and confidence in our business relationships, maintaining the reputation and credibility of our solar EPC company and its partners.

2.4 Quality and Excellence

Quality and excellence are integral to our commitment to delivering the best solar EPC solutions. We expect our suppliers to share this commitment by delivering products and services of the highest quality. This entails adherence to industry standards, quality control measures, and continuous improvement processes. Suppliers should strive for excellence in all aspects of their work, from product design and manufacturing to service delivery. By upholding these standards, we can jointly ensure the reliability and durability of our solar projects, providing long-term benefits to our clients and stakeholders.

2.5 Innovation and Technology

Innovation and technology drive progress in the solar energy industry, and we actively encourage our suppliers to be at the forefront of these advancements. We value innovation and believe it is essential for staying competitive and sustainable in a rapidly evolving market. Suppliers are encouraged to invest in research and development, explore innovative solutions, and collaborate with SIPL to integrate cutting-edge technologies into our projects. Together, we can push the boundaries of what is possible in the solar EPC industry, providing our clients with innovative, efficient, and sustainable energy solutions that meet the challenges of the future.

3. General Principles

3.1 Legal Compliance

Solon India Private Limited is committed to upholding the highest standards of legal compliance. We expect our suppliers to strictly adhere to all applicable laws, regulations, and industry standards in their business operations. This includes compliance with environmental laws, labour laws, safety regulations, and any other relevant legal requirements. Suppliers are responsible for staying informed about changes in regulations that may affect their operations and promptly adjusting their practices to remain in compliance. By demonstrating a strong commitment to legal compliance, we ensure that our partnerships are founded on a solid ethical and legal framework.

3.2 Business Integrity

Integrity is the cornerstone of our business relationships. We expect our suppliers to conduct their affairs with honesty, transparency, and fairness. This involves accurate and truthful representation of products and services, as well as fair pricing and billing practices. Unfair business practices such as fraud, misrepresentation, and deceptive advertising are strictly prohibited. We value long-term relationships built on trust and mutual respect, and suppliers who maintain the highest standards of business integrity are essential partners in achieving this goal.

3.3 Fair Competition and Anti-Corruption

SIPL is committed to fair competition and anti-corruption practices. We expect our suppliers to compete fairly and ethically in all markets and jurisdictions. Engaging in anti-competitive practices, such as price-fixing, bid-rigging, or market manipulation, is strictly prohibited. Moreover, we have a zero-tolerance policy for corruption and bribery in any form, whether involving public officials, private individuals, or other businesses. Suppliers must not offer,

give, receive, or solicit bribes or kickbacks. We encourage suppliers to establish robust anti-corruption policies and training programs to ensure that their employees are fully aware of and compliant with these principles. By collectively opposing corruption and promoting fair competition, we contribute to a level playing field and ethical business environment.

3.4 Conflicts of Interest

Conflicts of interest can compromise the integrity of business relationships. Suppliers are expected to identify and disclose any actual or potential conflicts of interest that may arise in their dealings with SIPL. This includes situations where personal interests may conflict with the interests of the business. Transparency in addressing conflicts of interest is critical to maintaining trust and ensuring that business decisions are made objectively and in the best interests of all parties involved. Our company will work collaboratively with suppliers to address conflicts of interest to the satisfaction of all parties while upholding the highest standards of fairness and transparency.

3.5 Intellectual Property Rights

Respecting intellectual property rights is essential in the innovation-driven solar EPC industry. We expect our suppliers to respect the intellectual property rights of others and protect their own intellectual property. Suppliers must not engage in any unauthorized use, reproduction, or distribution of copyrighted materials, trademarks, patents, or trade secrets. This includes not using SIPL's intellectual property without explicit permission. Additionally, we encourage suppliers to take measures to safeguard their own intellectual property rights. By fostering an environment of intellectual property protection and respect, we contribute to innovation and the continued development of the solar energy sector.

3.6 Privacy and Data Protection

Protecting the privacy and data of individuals is a priority for our company. Suppliers must handle personal data and sensitive information with the utmost care and in accordance with applicable data protection laws. This includes obtaining appropriate consent for data processing, ensuring the security of data storage and transmission, and promptly notifying affected parties and relevant authorities in the event of data breaches. Suppliers should have robust data protection policies and procedures in place to safeguard data integrity and privacy. By prioritizing privacy and data protection, we demonstrate our commitment to responsible and ethical business practices while building trust with our stakeholders and clients.

4. Environmental Responsibility

4.1 Sustainable Practices

Environmental sustainability is a core value of Solon India Private Limited (SIPL), and we expect our suppliers to share in this commitment. Suppliers are encouraged to adopt sustainable practices throughout their operations and supply chain. This includes minimizing waste, reducing energy consumption, and implementing eco-friendly manufacturing processes. We encourage the use of sustainable materials, products, and technologies that have a lower environmental impact. By integrating sustainable practices into our supply chain, we collectively reduce our ecological footprint and contribute to a more sustainable future for our planet.

4.2 Resource Conservation

Conserving natural resources is a fundamental aspect of SIPL's environmental responsibility. Suppliers should actively seek opportunities to conserve resources such as water, energy, and raw materials. This may involve adopting efficient production processes, implementing recycling and reuse programs, and reducing water and energy consumption. We also expect suppliers to source materials responsibly, considering their environmental impact and ethical sourcing practices. By conserving resources and promoting responsible sourcing, we contribute to the preservation of natural ecosystems and reduce our overall environmental impact.

4.3 Pollution Prevention

Pollution prevention is integral to our commitment to environmental responsibility. Suppliers must take proactive measures to prevent pollution of air, water, and soil during their operations. This includes managing and disposing of hazardous materials properly, complying with emissions regulations, and implementing pollution control technologies when necessary. Suppliers should regularly monitor their emissions and pollutant levels to ensure they remain within acceptable limits. By preventing pollution and minimizing environmental harm, we uphold our responsibility to protect the environment and public health.

4.4 Carbon Footprint Reduction

Reducing carbon emissions is a key objective in our efforts to combat climate change. Suppliers are encouraged to identify and implement strategies to reduce their carbon footprint as well. This may involve investing in energy-efficient technologies, promoting renewable energy sources, and optimizing transportation and logistics to minimize emissions. We also encourage suppliers to measure and report their greenhouse gas emissions transparently, as this allows us to collectively assess and mitigate our carbon impact. By actively working to reduce our carbon emissions, we contribute to a more sustainable and resilient planet.

4.5 Environmental Compliance

Environmental laws and regulations exist to protect our planet, and we expect our suppliers to comply with all applicable environmental requirements. This includes adhering to emissions limits, waste disposal regulations, and environmental permits. Suppliers should stay informed about changes in environmental legislation and adjust their practices accordingly. Regular environmental audits and assessments may be required to ensure compliance. We take environmental compliance seriously, and any violations of environmental laws may result in appropriate actions as outlined in our Code of Conduct. By prioritizing environmental compliance, we demonstrate our commitment to responsible and ethical environmental stewardship while fostering a sustainable future for all.

4.6 Conflict Mineral Compliance

At SIPL, we are committed to responsible and ethical sourcing practices. We recognize the critical importance of ensuring that the minerals used in our products are not contributing to conflict, human rights abuses, or environmental degradation in conflict-affected regions. To uphold these principles, we expect all our suppliers to share in this commitment.

5. Occupational Health and Safety

5.1 Employee Health and Safety

The health and safety of employees are of paramount importance to Solon India Private Limited. We expect our suppliers to prioritize the well-being of their employees by providing a safe and healthy work environment. This includes identifying and mitigating workplace hazards, conducting regular safety training, and ensuring that employees have access to the necessary personal protective equipment (PPE). Suppliers should also establish clear safety policies and procedures and conduct routine safety inspections to maintain a hazard-free workplace. By focusing on employee health and safety, we collectively create a workplace where individuals can thrive and perform their tasks without undue risk.

5.2 Contractor and Worker Safety

In addition to our employees, we extend our commitment to safety of contractors and workers employed by our suppliers. Suppliers are responsible for ensuring that their contractors and workers are also provided with safe working conditions and are aware of safety protocols. This includes conducting safety orientations, providing appropriate training, and enforcing safety measures on worksites. We encourage suppliers to collaborate with their contractors to maintain safety standards and ensure that all workers are protected from workplace hazards. By prioritizing contractor and worker safety, we demonstrate our commitment to a culture of safety that encompasses all aspects of our operations.

5.3 Reporting and Investigation of Incidents

Transparency in reporting and investigating safety incidents is essential to improving safety practices. Suppliers should establish clear procedures for reporting and investigating safety incidents, near misses, and accidents promptly. This includes documenting the incident, identifying root causes, and implementing corrective actions to prevent recurrence. Reporting incidents should not result in retaliation against employees or workers. We encourage a culture of continuous improvement, where lessons learned from incidents lead to stronger safety measures and prevention strategies. By fostering a culture of incident reporting and investigation, we create a safer work environment for all.

5.4 Emergency Response and Preparedness

Emergency preparedness is crucial to mitigate the impact of unforeseen events. Suppliers should develop and maintain emergency response plans that address potential workplace emergencies such as fires, chemical spills, natural disasters, and medical emergencies. These plans should be communicated to all employees and workers, and regular drills and training sessions should be conducted to ensure preparedness. Suppliers should also collaborate with SIPL to coordinate emergency response efforts when working on our projects. By being prepared and responsive to emergencies, we prioritize the safety and well-being of all individuals involved in our operations and projects.

6. Labour and Human Rights

6.1 Non-Discrimination and Equal Opportunity

Solon India Private Limited (SIPL) is dedicated to fostering a diverse and inclusive workforce and supply chain. We expect our suppliers to share this commitment by ensuring that all individuals are treated with respect and dignity, irrespective of their race, colour, religion, gender, sexual orientation, gender identity, age, national origin, disability, or any other characteristic protected by applicable laws. Discrimination and harassment of any form, including but not limited to, in hiring, promotion, compensation, and working conditions, are strictly prohibited. Suppliers should implement policies and practices that promote non-discrimination, equal opportunity, and diversity within their organizations. By upholding these principles, we collectively build a more equitable and inclusive industry.

6.2 Freedom of Association and Collective Bargaining

Freedom of association and the right to collective bargaining are fundamental human rights. We respect and uphold these rights, and we expect our suppliers to do the same. Suppliers should recognize and respect their employees' right to join or form labour unions and engage in collective bargaining processes without fear of retaliation or discrimination. We encourage open and constructive dialogue between management and employee representatives to facilitate fair and productive negotiations. By supporting freedom of association and collective bargaining, we contribute to an environment where workers can voice their concerns, negotiate for fair wages and working conditions, and collectively participate in decision-making processes.

6.3 Child Labour and Forced Labour

SIPL is committed to the elimination of child labour and forced labour in all aspects of our supply chain. We expect our suppliers to share this commitment and comply with all laws and regulations pertaining to child labour and forced labour. Suppliers should not employ individuals below the legal working age or engage in any form of forced labour, including bonded labour, prison labour, or human trafficking. They should have robust mechanisms in place to verify the age and consent of their workers and ensure that working conditions are safe and appropriate for all employees. By eradicating child labour and forced labour, we uphold the rights and well-being of vulnerable individuals while promoting ethical labour practices.

6.4 Working Hours and Compensation

SIPL believes in fair and equitable compensation for all workers. Suppliers should adhere to all relevant laws and regulations related to working hours, wages, and benefits. Working hours should not exceed legal limits, and overtime should be voluntary and compensated at rates that meet or exceed legal requirements. Suppliers should ensure that their employees receive fair and competitive wages and benefits that align with industry standards and cost of living in the region. By providing fair compensation and respecting working hours, we demonstrate our commitment to the financial well-being and dignity of workers.

6.5 Diversity and Inclusion

Diversity and inclusion are essential to fostering innovation and creativity in our industry. We encourage our suppliers to embrace diversity and promote inclusive practices within their organizations. This includes creating a work environment where all employees are valued, respected, and provided with equal opportunities for growth and advancement. Suppliers should actively seek diverse perspectives and backgrounds when making hiring and promotion decisions, and they should implement inclusive policies and practices that accommodate individuals with different needs and abilities. SIPL actively promotes the inclusion of local small, medium or minority businesses such as those owned by women, youths, ethnic and social minority groups including persons with disabilities and encourages its suppliers to do the same. By prioritizing diversity and inclusion, we collectively harness the power of diverse perspectives and talents, leading to stronger, more resilient, and innovative partnerships.

7. Supplier Relationships

7.1 Fair Business Practices

Solon India Private Limited (SIPL) believes that fair business practices are essential for fostering trust and long-term relationships with our suppliers. Our company expects all suppliers to engage in fair and ethical business dealings. This includes transparent and competitive pricing, fair negotiation processes, and adherence to contractual agreements. Suppliers should not engage in any form of collusion, price-fixing, or anti-competitive behaviour. We encourage open and fair competition, which ultimately benefits our clients, our industry, and the broader marketplace. By upholding fair business practices, we collectively create an environment where integrity, honesty, and fairness are the cornerstones of our supplier relationships.

7.2 Transparent and Ethical Communication

Transparent and ethical communication is vital for maintaining strong and ethical supplier relationships. We expect our suppliers to communicate openly and honestly with SIPL. This involves providing accurate information about products, services, pricing, and capabilities. Suppliers should avoid misrepresentation, deceptive advertising, or any form of dishonesty in their communications. We encourage clear and timely communication on all matters, including potential challenges or issues that may affect our partnership. By fostering a culture of transparent and ethical communication, we build trust and ensure that our relationships are based on integrity and mutual understanding.

7.3 Respect for Intellectual Property

Respecting intellectual property rights is essential in the innovation-driven solar EPC industry. We expect our suppliers to respect the intellectual property rights of others and protect their own intellectual property. Suppliers should not engage in any unauthorized use, reproduction, or distribution of copyrighted materials, trademarks, patents, or trade secrets. This includes not using our company's intellectual property without explicit permission. Additionally, suppliers should promptly report any suspected intellectual property infringements or violations to our company. By prioritizing respect for intellectual property, we contribute to

an environment that encourages innovation and the protection of creative and technological advancements.

7.4 Confidentiality and Data Protection

Confidentiality and data protection are critical aspects of our supplier relationships. Suppliers may have access to sensitive information about our company, projects, or clients. It is imperative that suppliers handle such information with the utmost care and confidentiality. This includes protecting the security and privacy of data, preventing unauthorized access or disclosure, and complying with data protection laws and regulations. Suppliers should have robust data protection policies and procedures in place to safeguard data integrity and privacy. By prioritizing confidentiality and data protection, we ensure that sensitive information is handled securely and responsibly, maintaining the trust and confidentiality of our business relationships.

7.5 Compliance Monitoring and Audits

To uphold the standards outlined in this Code of Conduct, our company may conduct compliance monitoring and audits of supplier activities. Suppliers should cooperate fully with our compliance monitoring efforts, which may include on-site visits, document reviews, and interviews with employees. This monitoring is designed to ensure that suppliers are meeting their obligations and adhering to the principles outlined in this Code. If non-compliance or areas of improvement are identified, suppliers are expected to take corrective actions promptly. These audits are not meant to be punitive but rather to support a culture of continuous improvement and adherence to ethical and legal standards. By participating in compliance monitoring and audits, we collectively reinforce our commitment to ethical business practices and accountability within our supplier relationships.

8. Reporting and Whistleblower Protection

8.1 Reporting Violations

Solon India Private Limited is committed to upholding the highest standards of ethical conduct, and we expect our suppliers to share in this commitment. If a supplier becomes aware of any violations of this Supplier Code of Conduct or any other unethical or illegal activities within our organization or supply chain, we encourage them to report such violations promptly. Suppliers can report violations to our designated reporting channel, which may include a designated compliance officer or a confidential reporting hotline. We take all reports seriously and will thoroughly investigate any alleged violations. Reporting violations is not only a responsibility but also a vital contribution to maintaining the integrity and ethical conduct of our operations and supply chain.

8.2 non-Retaliation

SIPL is committed to ensuring that suppliers and their employees who report violations in good faith are protected from any form of retaliation. We prohibit retaliation against individuals who report violations, participate in investigations, or provide information related to ethical concerns. We encourage an environment where individuals feel safe and confident in reporting violations without fear of adverse consequences. If suppliers or employees believe they have experienced retaliation for reporting a violation, they should report it

immediately. Retaliation is a serious violation of our Code of Conduct and will be subject to appropriate disciplinary actions.

8.3 Investigation Process

When a violation is reported, SIPL will initiate a thorough and impartial investigation to determine the facts and circumstances surrounding the alleged violation. The investigation process will be conducted with utmost confidentiality, and information will only be shared with those who have a legitimate need to know. The investigation will include gathering evidence, interviewing relevant parties, and evaluating the information presented. We are committed to conducting investigations promptly and fairly to reach accurate conclusions.

8.4 Corrective Actions

If a violation is substantiated, SIPL will take appropriate corrective actions to address the issue and prevent its recurrence. Corrective actions may include disciplinary measures, process improvements, additional training, or changes to policies and procedures. We will work collaboratively with the supplier involved to implement necessary corrective actions. Our goal is not only to address the specific violation but also to foster a culture of continuous improvement and ethical conduct throughout our supply chain. We are dedicated to upholding the principles of transparency, accountability, and integrity, and we view each violation as an opportunity to strengthen our commitment to these values.

9. Continuous Improvement

9.1 Setting and Measuring Performance Goals

Solon India Private Limited is committed to the ongoing improvement of ethical, environmental, and safety performance throughout our supply chain. To achieve this, we encourage our suppliers to set and measure performance goals in alignment with the principles outlined in this Code of Conduct. Suppliers should establish clear, quantifiable objectives related to ethical conduct, environmental sustainability, and occupational health and safety. Regularly measuring progress against these goals is essential to track improvements and identify areas for enhancement. By setting and measuring performance goals, we collectively ensure that we are continually advancing our ethical and sustainable practices.

9.2 Training and Awareness

Education and awareness play a pivotal role in achieving continuous improvement. Suppliers should provide regular training and awareness programs to their employees, contractors, and workers on the principles and standards outlined in this Code of Conduct. Training programs should cover topics such as ethical conduct, environmental sustainability, safety protocols, and other relevant subjects. Suppliers should also keep their workforce informed about any updates or changes to this Code. By investing in training and raising awareness, we empower our workforce with the knowledge and skills necessary to uphold ethical, environmental, and safety standards.

9.3 Stakeholder Engagement

Stakeholder engagement is essential to understanding and addressing the diverse needs and expectations of our stakeholders, including employees, clients, communities, and regulatory bodies. Suppliers are encouraged to engage with relevant stakeholders to gather feedback, assess concerns, and incorporate stakeholder input into their operations. Open and constructive dialogue with stakeholders fosters collaboration, helps identify areas for improvement, and builds trust within the supply chain. Suppliers should regularly communicate with SIPL and other stakeholders to ensure alignment with evolving ethical, environmental, and safety expectations.

9.4 Review and Revision of the Code

SIPL recognizes that the business environment, regulations, and societal expectations evolve over time. Therefore, we view this Code of Conduct as a living document that should be subject to periodic review and revision. We encourage our suppliers to actively participate in this process by providing input, feedback, and suggestions for improvements. Additionally, suppliers should stay informed about updates or revisions to the Code and promptly incorporate any changes into their operations. By engaging in a collaborative approach to reviewing and revising the Code, we ensure that our ethical, environmental, and safety standards remain relevant and effective in addressing emerging challenges and opportunities in the solar EPC industry.

10. Compliance and Enforcement

10.1 Compliance Verification

Solon India Private Limited (SIPL) takes the principles and standards outlined in this Code of Conduct seriously and is committed to ensuring compliance throughout its supply chain. To verify compliance, SIPL may conduct regular assessments, audits, and reviews of supplier operations. These compliance verification activities may include on-site visits, document reviews, interviews, and performance evaluations. Suppliers are expected to cooperate fully with our compliance verification efforts and provide access to relevant records and personnel. These assessments are not meant to be punitive but are conducted to confirm adherence to ethical, environmental, and safety standards, as well as legal requirements. By participating in compliance verification, we collectively demonstrate our commitment to ethical conduct, transparency, and accountability within our supply chain.

10.2 Consequences of Non-Compliance

Compliance with this Code of Conduct is a fundamental requirement for all our suppliers. Failure to comply with the principles and standards outlined herein may result in consequences as defined in our contractual agreements. Consequences for non-compliance may include, but are not limited to, warnings, suspension of business activities, termination of contracts or partnerships, and legal action as permitted by applicable laws and regulations. The severity of consequences will be determined on a case-by-case basis, taking into consideration the nature and extent of the violation. SIPL is committed to taking appropriate actions to address non-compliance and uphold the integrity and credibility of our supply chain.

10.3 Remediation and Corrective Actions

In cases of non-compliance, SIPL is committed to working collaboratively with suppliers to facilitate remediation and corrective actions. We recognize that mistakes can occur, and our primary objective is to support suppliers in rectifying issues and improving their practices. When non-compliance is identified, suppliers are expected to promptly take corrective actions to address the root causes of the violation and prevent its recurrence. SIPL may provide guidance and support to suppliers in the development and implementation of remediation plans. We value continuous improvement and view non-compliance incidents as opportunities to strengthen our ethical, environmental, and safety standards. By engaging in effective remediation and corrective actions, we collectively contribute to a supply chain characterized by responsible, ethical, and sustainable practices.

11. Conclusion

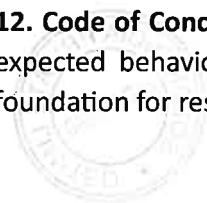
By reaching the conclusion of this Supplier Code of Conduct, Solon India Private Limited (SIPL) extends its appreciation to our valued suppliers for their commitment to ethical, environmental, and safety standards. We trust that suppliers have carefully reviewed, understood, and are dedicated to upholding the principles and standards outlined in this Code. Compliance with this Code is not merely a contractual obligation but a testament to our shared commitment to responsible and sustainable business practices. Suppliers are encouraged to actively promote these principles within their own organizations and supply chains. By acknowledging their understanding and compliance with this Code, suppliers affirm their commitment to maintaining the highest standards of integrity, environmental responsibility, and safety, contributing to the success of our partnerships and the advancement of the solar EPC industry.

SIPL values open and transparent communication with our suppliers. In case of questions, concerns, or the need for clarification regarding this Supplier Code of Conduct or its principles, suppliers are encouraged to contact our designated point of contact for code-related matters. The contact information for code-related inquiries will be provided separately to suppliers for easy access. We encourage suppliers to engage in proactive communication and seek guidance whenever needed to ensure that the principles and standards outlined in this Code are fully understood and implemented. SIPL is committed to maintaining a collaborative and supportive relationship with our suppliers and working together to achieve our mutual goals of ethical, sustainable, and responsible business practices in the solar EPC industry.



Appendix A: Glossary of Terms

- 1. Compliance Monitoring and Audits:** The process of evaluating and ensuring that suppliers adhere to the principles and standards outlined in the Supplier Code of Conduct through assessments, reviews, and audits of their operations.
- 2. Confidentiality:** The practice of protecting sensitive information from unauthorized access or disclosure, including trade secrets, proprietary data, and personal information.
- 3. Continuous Improvement:** The ongoing process of enhancing ethical, environmental, and safety performance by setting and measuring performance goals, conducting training and awareness programs, engaging with stakeholders, and periodically reviewing and revising standards and practices.
- 4. Corrective Actions:** Remedial measures taken by suppliers to address violations or non-compliance with the Supplier Code of Conduct, including implementing improvements, process changes, or remediation plans to prevent recurrence.
- 5. Ethics:** A set of moral principles and values that guide decision-making and behaviour, emphasizing honesty, integrity, and fairness in business conduct.
- 6. Non-Discrimination:** The practice of treating all individuals fairly and without prejudice, regardless of their race, colour, religion, gender, sexual orientation, gender identity, age, national origin, disability, or other protected characteristics.
- 7. Stakeholder Engagement:** The process of involving relevant parties, including employees, clients, communities, and regulatory bodies, in open and constructive dialogue to gather feedback, assess concerns, and incorporate stakeholder input into business operations.
- 8. Transparency:** The practice of openly communicating information about business operations, decisions, and performance, promoting honesty, accountability, and trust.
- 9. Whistleblower:** An individual who reports violations, unethical behaviour, or wrongdoing within an organization, often protected by legal provisions to ensure non-retaliation for reporting such concerns.
- 10. Workplace Safety:** The set of policies, procedures, and practices aimed at preventing accidents, injuries, and health hazards in the workplace, ensuring the well-being of employees and workers.
- 11. Sustainability:** The practice of meeting present needs without compromising the ability of future generations to meet their own needs, with a focus on environmental responsibility and resource conservation.
- 12. Code of Conduct:** A set of ethical and operational guidelines and standards that outline expected behaviours, values, and principles for individuals or organizations, serving as a foundation for responsible and ethical business conduct.



13. Compliance: The act of adhering to laws, regulations, contractual agreements, and ethical standards, ensuring that activities are conducted within legal and ethical boundaries.

14. Environmental Responsibility: The commitment to minimizing environmental impact, conserving natural resources, preventing pollution, and reducing carbon emissions in business operations and supply chain practices.

15. Occupational Health and Safety: The measures and practices in place to protect the health and safety of employees, contractors, and workers in the workplace, including hazard identification, safety training, and emergency preparedness.

16. Child Labour: The illegal employment of individuals under the legal working age, typically considered to be under 18 years old, in violation of child labour laws and international labour standards.

17. Forced Labour: Any form of work or service that is extracted from an individual under threat or coercion, including bonded labour, prison labour, and human trafficking, often in violation of human rights and labour laws.

18. Intellectual Property Rights: Legal rights that protect creations of the mind, such as patents, copyrights, trademarks, and trade secrets, allowing creators to control the use and distribution of their intellectual property.

19. Data Protection: The practice of safeguarding personal and sensitive information, ensuring its security, confidentiality, and compliance with data protection laws and regulations.

20. Non-Retaliation: The assurance that individuals who report violations, ethical concerns, or wrongdoing are protected from any form of retaliation, ensuring their safety and security in raising such issues.

Appendix B: Relevant Legal and Regulatory References

The following is a list of relevant legal and regulatory references that pertain to the principles and standards outlined in this Supplier Code of Conduct. Suppliers are expected to be familiar with and comply with these laws and regulations in addition to the ethical standards set forth in the Code. Please note that this list may not be exhaustive, and it is essential for suppliers to stay informed about changes and updates to applicable laws and regulations.

1. Ethical and Business Conduct

Anti-Corruption Laws: In addition to international conventions, it is essential to adhere to local laws and regulations specific to the regions where Solon India Private Limited (SIPL) operates. These laws may include anti-corruption acts, fraud statutes, and regulations related to reporting suspicious activities.

Anti-Trust and Competition Laws: Suppliers should adhere to antitrust and competition laws that promote fair competition and prevent anti-competitive behaviour, such as price-fixing and bid-rigging.

Consumer Protection Laws: Compliance with consumer protection laws, including regulations governing advertising, product safety, and labelling, is required to ensure transparent and fair business practices.

2. Environmental Responsibility

Environmental Protection Laws: Suppliers must comply with all relevant environmental protection laws and regulations, which may include emissions standards, waste disposal regulations, and environmental permitting requirements.

Carbon Emissions Regulations: Compliance with carbon emissions regulations and reporting requirements, including those related to greenhouse gas emissions, is crucial for reducing the carbon footprint and addressing climate change.

3. Occupational Health and Safety

Occupational Health & Safety Management Systems: ISO 45001:2018 is designed to help organizations ensure the health and safety of their employees and other stakeholders by identifying and managing occupational health and safety risks and opportunities. It provides a systematic approach to managing workplace safety, compliance with regulations, and the prevention of accidents and injuries.

4. Labour and Human Rights

Labour Laws: Suppliers must adhere to applicable labour laws, including minimum wage, working hours, and labour rights protection, to ensure fair and ethical treatment of employees.

Human Rights Laws: Compliance with human rights laws and international standards, such as the United Nations Guiding Principles on Business and Human Rights, is essential to protect human rights in the workplace and supply chain.

5. Privacy and Data Protection

Data Protection Regulations: Suppliers must comply with data protection regulations, to safeguard the privacy and rights of individuals' personal data.

This list is provided for reference purposes and does not constitute legal advice. Suppliers are encouraged to consult with legal counsel to ensure compliance with all relevant laws and regulations in their respective regions and industries. Failure to comply with applicable legal and regulatory requirements may result in consequences as outlined in the Supplier Code of Conduct.

This appendix serves as a reference guide for suppliers to understand the legal and regulatory landscape that intersects with the principles and standards of the Supplier Code of Conduct.

Appendix C: Compliance Checklist

This Compliance Checklist is provided as a tool to help suppliers assess their adherence to the principles and standards outlined in the Supplier Code of Conduct. Suppliers are encouraged to regularly review and complete this checklist as part of their commitment to ethical, environmental, and safety compliance. Please note that this checklist is not exhaustive and may be adapted to suit specific organizational needs.

Supplier Name: _____

Date of Compliance Assessment: _____

1. Ethical and Business Conduct

- ☐ I have read and understood the Supplier Code of Conduct.
- ☐ Our organization has established and communicated a clear Code of Conduct to our employees.
- ☐ We have mechanisms in place to ensure compliance with anti-corruption laws, including policies and procedures.
- ☐ Our organization promotes fair competition and complies with antitrust and competition laws.
- ☐ We adhere to consumer protection laws and regulations in our business practices.

2. Environmental Responsibility

- ☐ We have established sustainable practices within our operations and supply chain.
- ☐ Resource conservation measures, such as energy and water efficiency, are implemented.
- ☐ Pollution prevention practices are in place, and we adhere to relevant environmental laws.
- ☐ Our organization actively works to reduce its carbon footprint.
- ☐ We regularly monitor and report our environmental compliance.

3. Occupational Health and Safety

- ☐ Employee health and safety are a priority in our organization.
- ☐ Contractor and worker safety are addressed in our operations and projects.
- ☐ We have established procedures for reporting and investigating safety incidents.

☐ Emergency response and preparedness plans are in place and communicated to employees and workers.

4. Labour and Human Rights

☐ Our organization promotes non-discrimination and equal opportunity in hiring and employment.

☐ We respect freedom of association and collective bargaining rights for our employees.

☐ Child labour and forced labour are strictly prohibited in our organization.

☐ Working hours and compensation adhere to applicable laws and regulations.

☐ We actively promote diversity and inclusion within our workforce.

5. Privacy and Data Protection

☐ We have established data protection policies and practices.

☐ Personal data is handled securely and in compliance with data protection laws.

☐ We respect intellectual property rights and protect our own intellectual property.

☐ Confidentiality and privacy are maintained in our operations.

6. Stakeholder Engagement and Continuous Improvement

☐ We engage with stakeholders to gather feedback and assess concerns.

☐ Training and awareness programs on ethical, environmental, and safety standards are provided to our employees.

☐ We actively participate in periodic reviews and revisions of our ethical and sustainability standards.

☐ Compliance with applicable laws and regulations is monitored regularly, and corrective actions are taken when necessary.

Acknowledgment:

I acknowledge that this checklist serves as a self-assessment tool to evaluate our organization's compliance with the Supplier Code of Conduct. I understand that compliance with the Code and relevant laws and regulations is a fundamental requirement for our partnership with Solon India Private Limited (SIPL). Any identified non-compliance will be addressed promptly through corrective actions.

Signature: _____

Name: _____

Date: _____

This Compliance Checklist is designed to help suppliers assess their compliance with the principles and standards set forth in Solon India Private Limited's Supplier Code of Conduct. Suppliers can use this checklist as a self-assessment tool and take necessary corrective actions to align their practices with the Code's requirements.

Appendix D: Supporting Documents and Resources

This section provides a list of supporting documents and additional resources to assist suppliers in understanding, implementing, and adhering to the principles and standards outlined in the Supplier Code of Conduct. These resources are valuable references that can help suppliers improve their ethical, environmental, and safety practices.

1. Ethical and Business Conduct

- U.S. Foreign Corrupt Practices Act (FCPA): A comprehensive resource outlining the requirements and implications of the FCPA, which prohibits bribery of foreign officials.
- United Kingdom Bribery Act: Information on the UK Bribery Act, which addresses bribery and corruption in business and outlines the requirements for compliance.

2. Environmental Responsibility

- Environmental Protection Agency (EPA): Resources from the EPA on environmental regulations, standards, and best practices, particularly relevant for suppliers operating in the United States.
- United Nations Sustainable Development Goals (SDGs): Information on the SDGs and how they relate to sustainability and environmental responsibility.

3. Occupational Health and Safety

- Occupational Safety and Health Administration (OSHA): OSHA guidelines and resources for workplace safety standards, particularly relevant for suppliers operating in the United States.
- International Labour Organization (ILO): ILO conventions and resources related to occupational health and safety, child labour, and forced labour issues.

4. Labour and Human Rights

- United Nations Guiding Principles on Business and Human Rights: A comprehensive guide outlining the principles and standards for respecting human rights in business operations.
- Equal Employment Opportunity Commission (EEOC): Resources on non-discrimination and equal opportunity in employment, particularly relevant for suppliers operating in the United States.

5. Privacy and Data Protection

- General Data Protection Regulation (GDPR): Information on GDPR and its requirements for protecting personal data, particularly relevant for suppliers operating in the European Union.

6. Stakeholder Engagement and Continuous Improvement

- Global Reporting Initiative (GRI): Resources and guidelines for sustainability reporting and stakeholder engagement practices.
- ISO Standards: Relevant ISO standards, such as ISO 14001 (environmental management) and ISO 45001 (occupational health and safety), which provide frameworks for continuous improvement.

7. Additional Resources

- Supplier Code of Conduct Contact Information: Contact details for inquiries, clarifications, and reporting related to the Supplier Code of Conduct.
- Additional Internal Policies and Procedures: Any internal policies, procedures, or guidelines specific to Solon India Private Limited that support the principles of the Supplier Code of Conduct.

Please note that this list of supporting documents and resources is not exhaustive, and suppliers are encouraged to seek additional resources and guidance specific to their industry and region. Suppliers are also encouraged to regularly review and update their knowledge of relevant laws, regulations, and best practices to ensure ongoing compliance with the Code's principles and standards.

This appendix serves as a reference guide for suppliers, providing them with valuable resources and documents to support their efforts in aligning their practices with the principles and standards outlined in the Supplier Code of Conduct.

A handwritten signature in blue ink, consisting of stylized, overlapping loops and lines.