



DSD Integrity Guide

Distributed Solar Development, LLC and its affiliates (collectively “DSD”) are committed to achieving the highest standards of professionalism and ethical conduct in its operations and activities. DSD expects its suppliers, subcontractors, and affiliates and subsidiaries and their sub-suppliers and sub-subcontractors and their affiliates and subsidiaries (collectively “Suppliers”) to conduct business according to the highest ethical standards of conduct and to comply with all applicable laws.

At DSD, we comply with all relevant international, national and local laws and regulations. Consistent with our commitment to integrity, DSD created this policy for Suppliers which, among other things, is guided by the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs) and the Ten Principles of the UN Global Compact.

This policy applies to all Suppliers and is intended to increase awareness regarding potential areas of compliance and establish a procedure for reporting concerns. Suppliers are expected to communicate and train their employees on these compliance requirements.

- I. **Fair Employment Practices:** To (i) observe applicable laws and regulations governing wages and hours, recruitment and employment contracts; (ii) allow workers to choose freely whether to organize or join associations of their own choosing for the purpose of collective bargaining as provided by local law or regulation; (iii) prohibit discrimination, harassment and retaliation; (iv) upon end of employment, reimburse return transportation costs for workers recruited from outside the country; (v) not charge workers recruitment fees or utilize firms charging workers such fees; (vi) not utilize fraudulent or misleading recruitment practices; (vii) not hold or destroy a worker’s identity or immigration documents; and (viii) provide workers with terms and conditions of employment in a language the worker understands.
- II. **Human Rights** (i) To respect human rights of your employees and others in your business operations and your activities for DSD; (ii) not to employ workers younger than sixteen (16) years of age or below the applicable minimum age, whichever is higher; (iii) not to use forced, prison or indentured labor, or workers subject to any form of physical, sexual or psychological compulsion, exploitation or coercion, or to engage in or abet trafficking in persons; (iv) to adopt policies and establish systems to procure materials from sources that have been verified as conflict free; and (v) to obtain, maintain and provide supporting data on your supply chain for materials to DSD when requested, on a platform to be designated by DSD.
- III. **Environment, Health & Safety:** (i) To comply with and where possible exceed applicable environmental, health and safety (EHS) laws and regulations and DSD’s contractor EHS requirements; (ii) to provide workers a safe and healthy workplace; and (iii) not to adversely affect the local community. If housing is provided or arranged, it must meet host country safety standards.
- IV. **Working with Governments, Improper Payments and Dealings with DSD Employees and Representatives:** (i) To maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery of government officials, (ii) not to offer or provide, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment or kickbacks, including offers



of employment, or participation in a contest, game or promotion, to any DSD employee, representative or DSD customer or to any government official in connection with any DSD procurement, transaction or business dealing, and (iii) to provide supporting data to DSD when requested.

- V. **Competition Law:** Not to share or exchange any price, cost or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending or current DSD procurement.
- VI. **Intellectual Property:** To respect the intellectual and other property rights of DSD and of third parties, including all patents, trademarks and copyrights.
- VII. **Controllershship and Tax Law:** To ensure that all invoices and any customs or similar documentation submitted to DSD or governmental authorities or audited by third parties in connection with transactions involving DSD accurately describe the goods and services provided or delivered and the price thereof, to ensure that all documents, communications and accounting are accurate and honest and not to take or participate in any actions that may be viewed as tax evasion or the facilitation of tax evasion.
- VIII. **Security and Privacy:** (i) To respect privacy rights and secure the data of DSD employees, customers, and suppliers (collectively, "DSD Data"); (ii) to implement and maintain physical, organizational and technical measures to ensure the security and confidentiality of DSD Data in order to prevent accidental, unauthorized or unlawful destruction, alteration, modification or loss of DSD Data, misuse of DSD Data, or unlawful processing of DSD Data; and (iii) protect Supplier operations and facilities against exploitation by criminal or terrorist individuals and organizations.
- IX. **Trade Controls & Customs Matters:** Not to transfer DSD technical information to any third party without the express, written permission of DSD, and to comply with all applicable trade control laws and regulations in the import, export, reexport or transfer of goods, services, software, technology or technical data including any restrictions on access or use by unauthorized persons or entities.
- X. **Escalating Questions or Concerns:** If you have any questions regarding this policy or want to raise concerns regarding areas of compliance outlined in this policy, please contact the Legal Department. Alternatively, concerns may be raised anonymously through DSD's ethics hotline at: 844-965-3517 or at <https://secure.ethicspoint.com/domain/media/en/gui/81378/index.html>. DSD prohibits any form of discipline, reprisal, intimidation or retaliation for reporting a potential compliance concern or cooperating in related investigations.