

HUMAN RIGHTS POLICY

1. PARTICULARS

Risk category	Human rights
Risk assessment	Solar Group, to the best of its knowledge, will refrain from working with business partners that fail to comply with these standards in their operations.
External reference	EU/local directives, regulations and standards, ILO Declaration on Fundamental Principles and Rights at Work, UN Guiding Principles on Business and Human Rights. OECD Human Rights Due Diligence. Transparency act (Forbrukertilsynet.no)
Target group	The Human Rights Policy applies to Solar Group and covers our employees, our suppliers and other business partners. Sustainable Procurement Policy is also relevant.
Classification	Public document available on Solar's Intranet and at solar.eu
Latest update	June 2026
Approved by	Executive Board, June 2026
Responsible	CEO
Contact person	Vice President, Sustainability

2. OBJECTIVE OF THE POLICY

Solar is committed to responsible operations. Sustainability is integral to our strategy and business practices. We believe adherence to international protocols, laws, and regulations supports human rights, protects marginalised populations and animal welfare, and ensures transparency across our value chain. Our target is zero breaches of our Human Rights Policy.

We value human life and dignity and foster a culture of respect and inclusion. We aim to be a great workplace by nurturing talent, promoting diversity and encouraging teamwork. We respect the rights of employees, consumers, supply chain workers, local communities, and all stakeholders impacted by our business.

Respecting the rights and interests of others is essential to being a trusted company and achieving Solar's long-term goals.

2.1 Targets and performance monitoring

Solar sets measurable targets to ensure effective implementation of this policy. These include, but are not limited to:

- 95% of suppliers covered by Supplier Code of Conduct
- 0% of high-risk suppliers subject to due diligence assessments
- 82% of spend is covered by full risk assessment

- Immediate action to remediation of identified adverse impacts

Progress is monitored regularly and reported in Solar's annual reporting.

3. SCOPE OF THE POLICY

3.1. Human rights at Solar

Solar does not accept any form of forced labour, neither in our own operations nor in the operations of suppliers and other business partners. Employment in a Solar company must always be based on voluntary agreement. Our companies must not have internal procedures or conduct activities that prevent employees from leaving the company at their own volition.

Solar engages with relevant stakeholders, including employees, suppliers, customers, and potentially affected groups, to identify and understand human rights risks and impacts.

Stakeholder input is considered in risk assessments and when designing mitigation and remediation measures.

Solar prioritises risks based on severity and likelihood of adverse impacts, with particular focus on the most serious risks to people, irrespective of financial impact to the company.

Solar conducts due diligence to ensure responsible business conduct. This involves conducting risk assessments to identify potential negative impacts on people, society, and the environment and to stop, prevent and reduce such impact. The measures put in place are monitored and their effect evaluated. The measures are communicated to those affected by our actions. If our activities are found to cause or contribute to negative impact on people, society, or the environment, we will stop the activities and seek to provide a remedy. If our supplier is responsible for the negative impact, the supplier is responsible for providing a remedy.

Human rights due diligence involves conducting risk assessments to identify and assess potential adverse (negative) human rights impacts associated with our operations, our supply chains and other business relationships, and to cease, prevent or mitigate such impact. The activities are monitored, and their effect evaluated. If we identify that we have caused or contributed to negative impacts, we implement relevant actions to provide remediation, i.e., stop or reverse the adverse impacts. We commit to having effective channels for complaints (grievance mechanisms) that are accessible to all employees and ask our suppliers to do the same.

If we identify adverse impacts which are directly linked to our operations, products, or services through our suppliers or other business partners, we will actively influence the entity causing the adverse impact, to cease, prevent or mitigate the impact. We expect our suppliers and business partners to respect human and workers' rights and establish human rights policies which address the corporate responsibilities outlined in the UN Guiding Principles for Business and Human Rights. If we discover that suppliers or business partners are involved in violations of human rights, we will communicate our concerns and demand that the supplier or business partner take appropriate action, e.g., through a remediation process. If corrective actions are not taken and the violations endure, an assessment is made of whether to end the business relationship.

Through Solar's Annual Report we report on the activities conducted to identify and address actual or potential adverse impacts, including the findings and outcomes of those activities, and make information about our due diligence policies and processes easily available for external stakeholders. The report sets out Solar's guiding principles for upholding human and workers' rights which we see as relevant to our daily operations. This applies to all Solar subsidiaries and Group functions.

Our ethical requirements for supplier conduct are described in Solar's Supplier Code of Conduct.

3.2 Human Rights Due Diligence framework

Solar's human rights due diligence is aligned with the OECD due diligence guidelines for responsible business conduct, following the six-step approach:

1. Embed responsible business conduct into policies and management systems
2. Identify and assess actual and potential adverse impacts in our operations, supply chains, and business relationships
3. Cease, prevent or mitigate adverse impacts
4. Track the effectiveness of actions taken
5. Communicate how impacts are addressed
6. Provide for or cooperate in remediation, where appropriate

This framework is integrated into Solar's governance, risk management and internal control systems.

Solar engages with relevant stakeholders, including employees, suppliers, customers, and potentially affected groups, to identify and understand human rights risks and impacts.

Stakeholder input is considered in risk assessments and when designing mitigation and remediation measures.

All Solar companies must work in a systematic manner to respect human rights, in line with the principles described below.

3.3 Freedom of thought, opinion, and expression

We value open, fact-based, honest, and respectful communication within our own organisation as well as in our dialogue with external stakeholders. We strive to achieve a working environment where employees feel comfortable about expressing their opinion without fear of retaliation. All our companies are required to take appropriate steps to make it easy for employees and external stakeholders to raise concerns and ensure that stakeholder concerns are handled in a respectful, fair and professional way. We respect freedom of religion, and we strive to foster a working environment where all our employees feel included regardless of religious beliefs or cultural background. Our companies are required to show flexibility when responding to concerns raised by employees in relation to religious customs, provided these do not conflict with business needs or the rights of others.

3.4 The right of life

We do our utmost to protect the health and safety of employees, customers and others linked to our business. All our companies have committed to the vision of zero harm to people, and work purposefully to create safe, healthy, and attractive workplaces, in line with the requirements described in the Health, Safety and Work Environment Policy and the Environment Policy. We make every effort to prevent behaviour or working conditions that may negatively influence the mental and physical health of our employees and their families. Managers must be aware of their responsibility for the

safety and well-being of employees and to use the power of their position to foster a positive and healthy working environment. Solar does not tolerate any form of coercion, punishment, or harassment towards employees.

3.5 The rights of liberty, security, and privacy

Solar does not accept any form of forced labour, neither within our own organisation nor within the organisations of suppliers and other business partners. Employment in a Solar company must always be based on voluntary agreement. Our companies do not have internal procedures or carry out activities that prevent employees from leaving the company at their own volition. We want to show due respect for the privacy of employees, customers and other individuals, and our companies are required to adopt a restrictive stance on employee monitoring and privacy intrusion.

3.6 Human trafficking

We do not accept any form of human trafficking or slavery. This includes actions such as forced labour, forced marriage, sexual exploitation, child labour, and organ removal. We recognise that such practices violate fundamental human rights and are prohibited under international human rights law.

3.7 Competence development

Solar regards employee development as important in the achievement of our business targets and in providing an attractive place to work. We want people to grow and flourish

so they can deliver at their full potential. Moreover, we want our employees to feel that their efforts are valued and used in a meaningful way. We want to equip our people with the skills needed to be innovative and relevant in their jobs, and to address a potential future skills-gap. Solar companies are expected to continually invest in the training, education and reskilling of their workforce to adapt to evolving work patterns resulting from new tools and technologies. Our employees should receive at least annual feedback on the quality and performance of their work and are invited to discuss relevant personal development activities. As defined in our collective agreement, all employees are invited, on a minimum annual basis, to a career development dialogue with their manager.

3.8 Diversity and non-discrimination

We regard diversity of perspectives as important in making good decisions, inspiring creativity and generally contributing to business improvement. Our companies are expected to work systematically to promote diversity in the workplace and to prevent discrimination based on gender, religion, race, national or ethnic origin, cultural background, caste, social group, disability, sexual orientation, marital status, age, or political opinion. Our companies are required to foster a culture where personal differences are respected and appreciated, and to promote equal opportunities, particularly in relation to recruitment, compensation and benefits, promotion, and training. Our companies are also required to assess how operating processes and work tools can be adapted to the physical differences of our employees and to make reasonable adjustments accordingly.

3.9 Consultation and employee involvement

We regard good internal communication and cooperation between management and employees as critical to the company's success and to the well-being of employees. Our companies must allow employees to be involved in decisions that are relevant to themselves and to the workplace, e.g., in matters pertaining to occupational health and safety and workforce reduction. Our employees are kept updated on company strategy and development through the intranet and relevant meetings. We respect freedom of association and the right to collective bargaining and want to foster a respectful and constructive dialogue between management and trade unions. Our companies must establish channels for dialogue and cooperation between the management and employee representatives.

3.10 Fair working terms

We want to provide just and favourable working conditions for our employees. Our companies must ensure that all their employees, including part-time employees and temporary workers, have a written working contract. Working hours must comply with national law and benchmark industry standards, whichever affords greater protection, and with negotiated company agreements. Work should be organised in a way that allows employees to handle their assigned responsibilities within normal working hours, and reasonable actions are taken to prevent an unhealthy workload. The use of overtime must follow national legislation and is based on a framework agreement which has been negotiated with the company's employee representatives. All Solar companies must maintain working conditions that allow employees to balance work and family life,

including due consideration for parental duties. Employees must be provided with at least one day off in every seven-day period. All full-time employees must, as a minimum, receive wages and benefits that are sufficient to afford a decent standard of living for the worker and her or his family ensuring a living wage. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs, including provision for unexpected events.

3.11 Respect for children's rights

We recognise the vulnerability of children and do our utmost to protect them from physical, mental, or moral harm. We respect children's rights and actively support these through our activities and business relations. No Solar company shall employ individuals who are under the standard age for completing compulsory education, or under 15 years of age, whichever is the highest. Young workers, defined as employees who are above the school-leaving age, but are under the age of 18, must not perform hazardous work, or work to an extent that negatively affects the ability to participate in education. If child labour is found within our own operations, we will immediately remove the child from all work, set up a remediation programme to protect the interests of the child and monitor the progress of the programme until the child has reached working age. Such cases must always be reported to Solar Group, and relevant actions will be determined in a dialogue with the business unit and business area concerned.

3.12 Marginalised populations

All our companies must ensure that their operations do not interfere with the right of indigenous people to self-determination, e.g., in relation to land areas or other natural resources upon which they are dependent. If a Solar company's business plan impacts on a marginalised population, the company is required to establish a dialogue with representatives of the population group to find a solution which is satisfactory to both parties.

3.13 Animal welfare

Animal welfare must be respected. If a negative impact on animal welfare is detected, we will initiate measures to minimise negative impact on the welfare of production animals and working animals. Solar companies must comply with national and international animal welfare legislation and regulations.

3.14 Employee Code of Conduct

As of 2025, all employees are invited to take the course on business ethics and in our Employee Code of Conduct, on our online training portal. The training requires participants to take and pass a quiz, to complete the course. The course, and similarly our Code of Conduct covers topics on safe working conditions, basic human rights, diversity and inclusion - including discrimination and harassment -, respect at work, personal data, insider trading, conflict of interest, gifts and entertainment, protection of

Solar's property, whistleblower, accurate records and financial integrity, fair competition and the fight against corruption, and climate and environment. Furthermore, it is a condition for all employees to sign and accept the conditions of our Employee Code of Conduct.

4. TRANSPARENCY AND RIGHT TO INFORMATION

Solar is committed to transparency regarding how we address human rights impacts.

In accordance with applicable legislation, including the Norwegian Transparency Act, Solar will respond to external requests for information regarding actual and potential adverse impacts on fundamental human rights and decent working conditions.

Requests will be handled in a timely and structured manner in accordance with internal procedures.

5. DEVIATIONS FROM THE POLICY

No deviations from this policy are allowed.

6. DIVISION OF RESPONSIBILITIES

The Board of Directors oversees Solar's human rights commitments and due diligence processes, including reviewing key risks, impacts, and mitigation actions.

The Executive Board is responsible for implementing the policy and integrating human rights into business strategy and operations.

Senior management ensures that relevant procedures, controls, and training are in place.

Human rights risks and performance are reported regularly to senior management and the Board.

This policy is reviewed annually.