

GAMECHANGE SOLAR'S INAUGURAL

ESG Report

2022

Contents

MESSAGE FROM LEADERSHIP	3
ABOUT US	4
OUR APPROACH	6
REPOWER	8
Energy management and climate change mitigation	8
Climate adaptation	9
Environmental supply chain management	10
RETHINK	11
Product design and lifecycle management	11
Product quality	12
Materials sourcing and efficiency	13
Waste management	14
EMPOWER	15
Health and safety	15
Human rights	16
Diversity, equity and inclusion	17
Talent attraction and development	18
GOVERNANCE	19
Transparency and accountability	19
Business ethics	20
Cybersecurity	21





MESSAGE FROM LEADERSHIP

Bold innovation and resolute expansion

Advancing on our ESG journey

I am delighted to share our inaugural ESG (Environmental, Social, Governance) report. The strategy presented here results from tremendous effort and determined focus from across our business. Every member of every team has been fully engaged in bringing this plan to fruition. As a result, we have transformed the values that have been at the heart of our activities since our founding into a rigorous blueprint for the future.

I am honored and excited to work in this sector. The statistics speak for themselves: installed solar energy capacity has skyrocketed since 2010 from 40.34 GW to 843 GW¹ and gathers momentum every year. Solar energy hired more people than any other renewable energy industry in 2022.² Yet much more needs to be done. To achieve net zero by 2050, solar energy generation must grow by 25% each year through 2030.³ It is little wonder then that our groundbreaking products, which maximize solar energy


production in any environment, are in high demand. Right now, our systems support over 72 million solar modules around the world – creating enough electricity to power over 5.7 million homes for a year. Every year, over 41 million tons of carbon emissions are avoided by electricity generated with support from our systems.

For us, 2022 was characterized by bold innovation and resolute expansion. We hired 88 new associates, growing our team from 202 in 2021 to 290 at the end of 2022, a 43.5% increase. Moreover, our revenue grew 137%. We also opened an office in Suzhou, China and a training facility in Ahmedabad, India, broadening our market reach and global customer service. As part of our goal to drive change and innovation throughout the industry, we launched SolarConnections, an annual event for solar professionals to share and synergize ideas. Our efforts were recognized at the prestigious Renewable Energy India Expo 2022, where we were awarded “Best in Performance” for solar trackers.

A major development for ourselves and our industry this year was the passing of the US Inflation Reduction Act. Prompted by this law, we moved some of our contracted production to the USA, which supports lowering our scope 3 emissions. This is due to a reduction in ocean shipping and because our US steelmakers tend to have a lower carbon footprint.

As we advance our ESG plan, our immediate next steps will be to collaborate closely with our vendors to understand and develop their approaches to ESG. We'll also be transforming our supply chain to reduce our reliance on ocean freight.

We now look forward to building on the successes of 2022 to drive green prosperity with a responsible business that we can be proud of for many years to come.

 **Phillip Vyhanek**
President & COO, GameChange Solar

The strategy presented in this report results from tremendous effort and determined focus from across our business.

– PHILLIP VYHANEK

1 'Installed Solar Energy Capacity', [Our World in Data](#).

2 'Unleashing Renewable Energy's Full Potential', [UNFCCC](#).

3 'Solar PV – Analysis', [IEA](#).





ABOUT US

A fast-growing company with global presence

All of our employees contribute to our mission to repower the planet

We are a fast-growing company with global presence. This is reflected in the 43.5% increase in our employee count between 2021 and 2022, largely due to our expansion in international markets.



Increase in our employee count (2021-22)

We boosted our presence in several international markets where we have operations, engineering and training centers. These centers ensure we have a presence in all key continents including Africa, Europe, South America, and Australasia, as well as North America.

We value our employees and the different contributions they make to our mission. Of our total staff, over half (55%) work in operations, 23% in research and development, with the remainder in administrative roles.



Of our staff work in operations



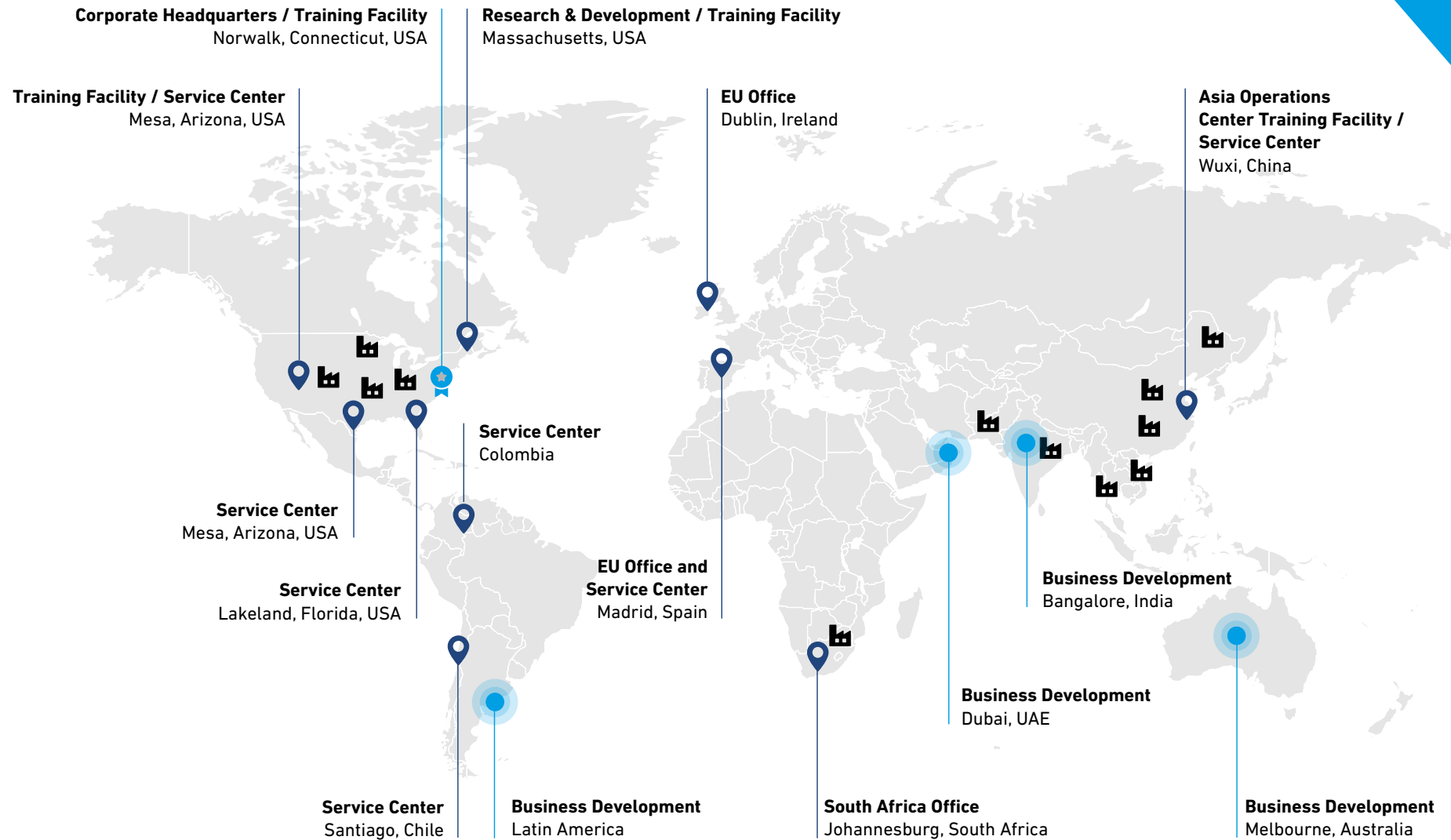
Of our staff work in research, development and engineering





ABOUT US

Global coverage



CUSTOMER PROJECT HIGHLIGHTS FOR 2022

- PUERTO RICO**
117MW
Largest East West Orientation Fixed Tilt System supplied to date.
High wind conditions of 175 mph
- TEXAS**
640MW
Largest single site project to date outside Houston
- 270MW**
Largest Genius Tracker utilizing different First Solar Modules – both series 4 and series 6
- PENNSYLVANIA**
126 MW
Largest US based 2P Tracker installed
- COLOMBIA AND HONDURAS**
First projects commissioned

MANUFACTURING CAPACITY

USA	OUTSIDE USA
24GW+	18GW+



OUR APPROACH

Materiality

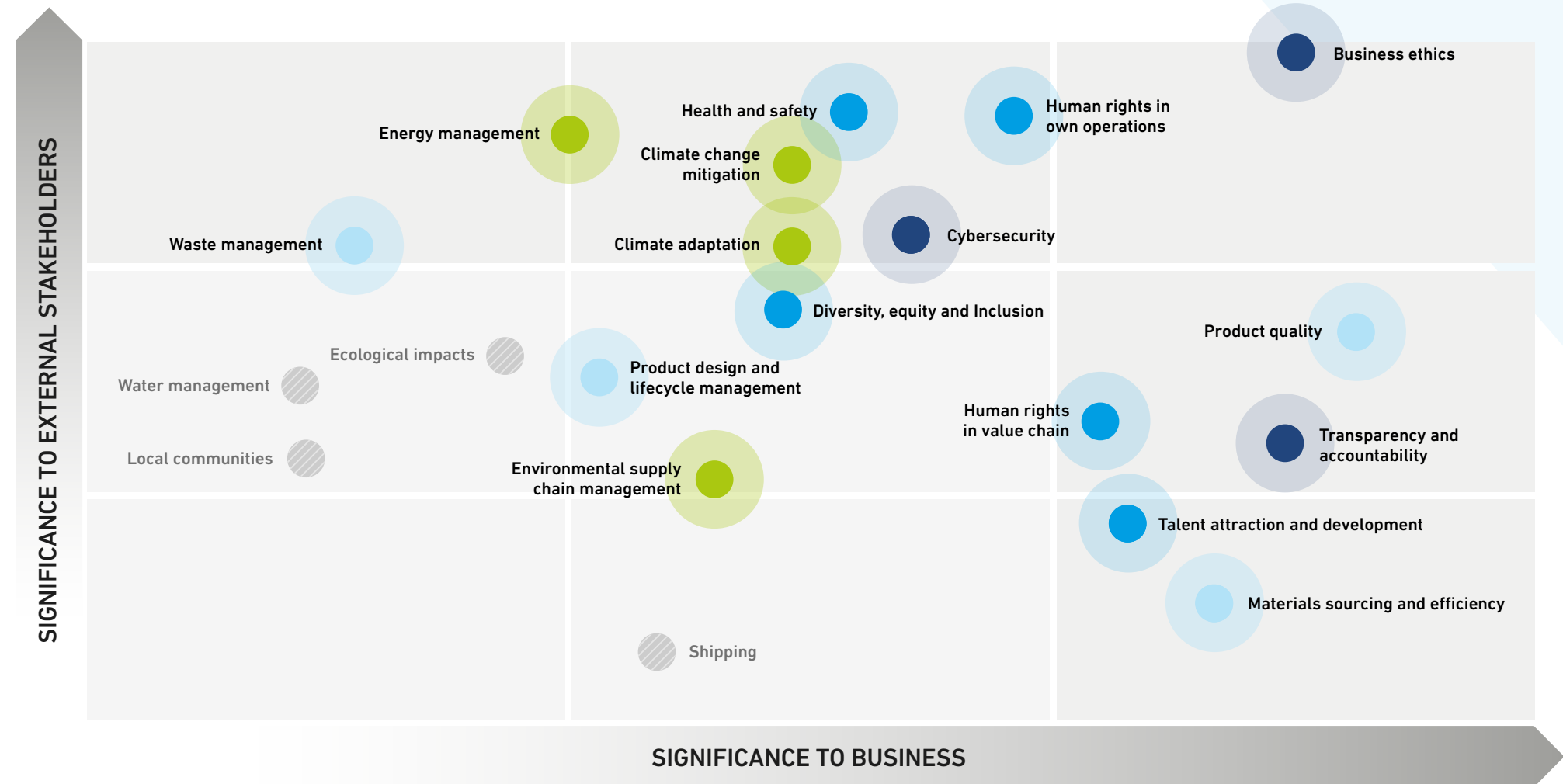
The pillars of our approach to ESG

To optimize our impact we need to prioritize our focus areas. In 2022, we conducted a materiality assessment, which revealed the ESG issues that most impact our operations, supply chain, people and communities.

Whether positive or negative, we fully acknowledged all potential impacts of our business and will scrutinize these opportunities and risks in the months and years ahead.

We group the most significant issues into four pillars of activities:

- REPOWER
- RETHINK
- EMPOWER
- GOVERNANCE





OUR APPROACH

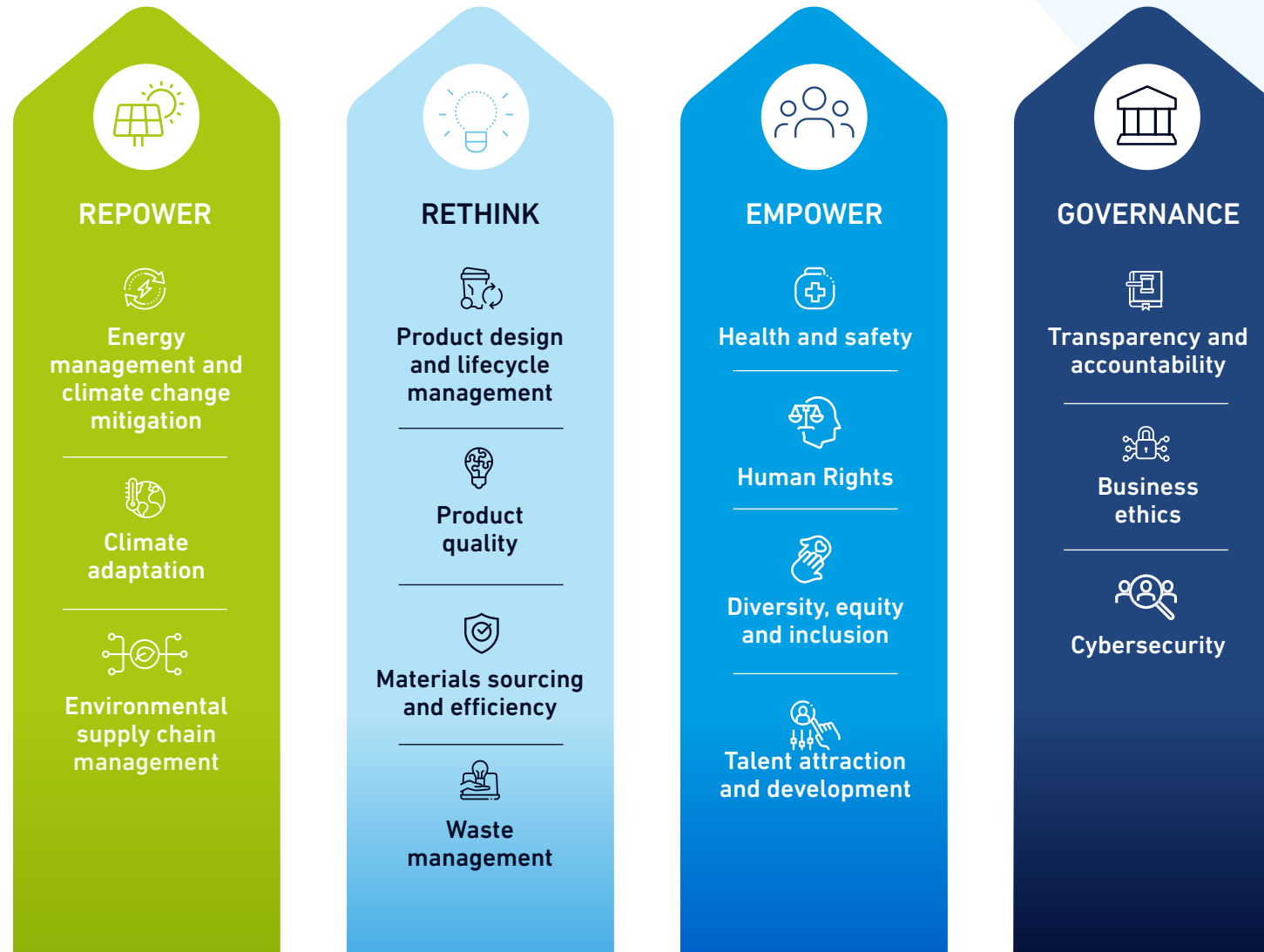
A three-year plan

Putting our strategy into action

We are hard at work putting our strategy into action. Each of the four pillars in our strategy has a workstream, and in 2023 we will finalize the collection of benchmark data for each.⁴ The insight that emerges will be utilized to set ambitious targets for the next two years, which we will expand going forward.

Each pillar of our strategy has a clear line of responsibility to a management team representative along with specific markers of progress. At the same time, we will ensure our efforts are not siloed and instead reflect the cross-functional challenges inherent to creating a sustainable business. The management team will work together to align each workstream.

⁴ KPIs are aligned with GRI standards.



Collaboration with vendors

We cannot by ourselves realize our challenging goals and bold vision for a world fueled by clean energy. That is why we join forces with a broad range of key partners across the industry. Our focus is to work collaboratively with our vendors and commodity suppliers to support our ESG vision.



Energy management and climate change mitigation

Supporting the global efforts in cutting greenhouse gas emissions

Our company exists to support the global effort to cut global greenhouse gas emissions through the generation of clean solar energy.

We want to ensure this intent is reflected across our entire operational footprint and have been sourcing and collecting energy and emission data in order to track and reduce emissions. We are heading in the right direction. Our greenhouse gas emissions intensity reduced by 21% between 2021 and 2022. Due to the fast growth of our company, in absolute terms our scope 1 and 2 emissions both increased within the same period. Specifically, we required more electricity to power our Norwalk and El Paso facilities, which transitioned from start-up mode to fully operational between 2021 and 2022. This growth was reflected in our revenue which we boosted by 137% in this period.

We outsource manufacturing and processing, and so, like other companies with a similar structure, the largest part of our footprint will be from scope 3 (indirect) emissions.

OUR ENERGY AND EMISSIONS

Description	2021	2022	YOY change
Electricity consumed (Kwh)	134,452	249,974	86%
Scope 1 (Tonnes CO ₂ e) ⁵	6.0	18.7	210%
Scope 2 (Tonnes CO ₂ e) ⁵	50.2	86.7	73%
Carbon Intensity (Scope 1 and 2 / M\$ Revenue)	0.14	0.11	-21%

Throughout 2023 we will start to identify and quantify our scope 3 emissions. This will require working closely with our commodity vendors to capture relevant data on our steel inputs. This is because steel alongside shipping represents the largest component of our spend, and as such it is expected that this will be reflected in our scope 3 emission profile. Also in 2023, we will continue to improve our intensity factor as we grow in revenue and locations.

⁵ Calculated using GHG Protocol.

45.8M tonnes

Total MT of carbon emissions avoided since 2016

37M tonnes

Capacity for avoided carbon emissions by generating electricity on GameChange Solar systems each year (contracted to date)





Climate adaptation

Our product design process integrates the historical and current climate situations by site

We apply advanced data and meteorological modelling to our product configurations; everything we make is designed and manufactured to withstand the extreme weather conditions expected.

This is particularly important given that locations with high solar radiance can also have challenging climate conditions, such as Florida where we have 7.3 GW deployed. The ability to tailor our product specifications such as steel grade and coating allows us to match our products to customer requirements and weather conditions in different locations. That means, for instance, products heading to high climate risk areas have been designed to withstand the extreme weather events.

We welcome the development of the Task Force on Climate-Related Financial Disclosures (TCFD) to promote transparency of climate related risks and opportunities. We are proactively preparing to report in line with the framework in our future reporting.

CASE STUDY: USING CLIMATE DATA TO INFORM PRODUCT DESIGN

Climate-induced extreme weather events, such as heatwaves, storms and flooding, which are already increasingly commonplace will continue to grow in severity and frequency, according to the Intergovernmental Panel on Climate Change⁶. Global infrastructure must reflect this reality.

Climate change adaptation is integrated into our product design process from inception. Our team of engineers use a range of geotechnical data, including on soil conditions, wind levels, temperature ratings, vegetation, rainfall and snow loads.

We utilize this information to create products that will make the most of expected weather conditions. Our designs will use the optimum amount of steel for expected site conditions.

⁶ Seneviratne S.I., Zhang, M. Xieubin, 2021. [In Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change.](#)





Environmental supply chain management

Vendor qualification process and sustainability requirements

Steel remains the best option to make high-quality products that can withstand increasingly extreme weather conditions. Our steel inputs represent our largest environmental impact.

Given that we are not steel manufacturers, we must work closely with our vendors to reduce the impact of steel while delivering our clients with low-cost, high-quality systems. With this aim, in 2022 we enhanced our vendor qualification process.

Our focus is on top commodity vendors to adhere to sustainability requirements, including compliance reporting and auditing. Vendors must also provide specified documentation, such as environmental management certification and emissions disclosure. In 2023 we will expand this process to include a wider range of environmental factors, including evaluating the implementation of ISO 14001.

VENDOR QUALIFICATION PROCESS





Product design and lifecycle management

Designs that optimize materials to meet customer expectations

Groundbreaking product design is the essence of our business. It is our focus to meet and exceed customer expectations.

We feed detailed assessments of current and projected weather conditions at each target site into our optimized design process. A precise combination of steel type, strength, shape and other factors optimizes steel quantity in each project. No raw materials are used beyond what is required to create a long-lasting, state-of-the-art product.

Sites designed in 2022 demonstrated a reduction in steel per watt when compared to 2016. This reflects a 5.8% reduction in materials per watt between 2016 and 2022.

By collaborating with our Engineering, Procurement and Construction (EPC) contractors, we ensure our products are robust and require minimal maintenance.

Our engineering team will continue to develop our steel efficiency and product robustness in 2023 and beyond.

5.8%

**reduction in materials per watt
from 2016 - 2022**





Product quality

Quality management above and beyond regulation

We pride ourselves on delivering the highest caliber products with utmost quality.

In 2022 we hired a global head of quality to enhance our assurance processes and deliver ISO 9001, an international standard. We are on schedule to implement these guidelines by mid-2023 in accordance with our commitment to quality management above and beyond regulation.

Our primary focus will be on our product design processes ensuring the highest quality product specifications and supplier management including robust in-process inspection and finished goods quality. We have asked our commodity vendors to provide evidence of ISO 9001 certification as part of the vendor qualification process to ensure quality alignment. In 2023 vendor audits are expected to cover over 90% of the commodity vendors.

90%

Of the commodity vendors are expected to be covered by vendor audits in 2023





Materials sourcing and efficiency

Steel is over 80% of our material content

Steel constitutes our principal raw material input. Steel and logistics made up 90% of our spend in 2022. Both will fall under scope 3 emissions with steel being our primary focus in 2023.

As steel is the largest raw material component, we strive to use recycled steel where possible. In 2022, approximately 15% of our steel purchases included some recycled material. Posts were sourced overseas in 2022 with minimal recycled content, reducing the overall percentage. In 2023, we have prioritized sourcing more within the US and expect recycled steel content to double.

In addition, we will investigate whether and how we can use partnerships, global standards and memberships to drive social and environmental impact reduction throughout our entire supply chain. We plan to collect logistics data for evaluation during 2023.

We are committed to responsible sourcing and operating a supply chain free of conflict minerals. We fully support the goals established under Section 1502 of the Dodd Frank Act on conflict minerals and condemn human rights abuses associated with the extraction, transport, or trade of minerals and any direct or indirect support to non-state armed groups.

As detailed in our Conflict Mineral Policy, we comply with all the reporting obligations required under relevant sections of the Dodd Frank Act and the Securities and Exchange Commission (SEC) rules. We require all employees and direct suppliers to agree and comply with the principles and guidance outlined in our policy.





RETHINK



Waste management

Striving to reduce waste in our operations

Our designs are and always will be configured to minimize manufacturing waste. We continually review our designs to ensure this optimization.

Our own operations produce very little waste. This is largely due to our business model, which contracts out manufacturing. Going forward, we will work with our vendors to gather data on waste and support them in implementing waste reduction programs.

We support our customers in the collections and recycling of batteries. From January 2023 we have started tracking the amount of batteries recycled on behalf of our customers. Our batteries are over 95% recyclable.

Meanwhile, we will always strive to reduce and responsibly manage any waste that we do create through our own operations. For instance, we are exploring recycling the sample metal that is sent to our teams.



COMMITTED TO MINIMISING WASTE

It is essential to ensure our products arrive with our clients in the same excellent condition that they leave our manufacturing sites.

The majority of our steel is delivered on reusable dunnage and nylon bands at very little waste.

We are committed to evolving the materials we use in packaging and transportation to help minimise our impact on the environment.



We are investigating ways that we can partner to help minimise our customers' waste in addition to supporting and monitoring customer battery recycling.



Health and safety

Our workplace safety policy and training programs

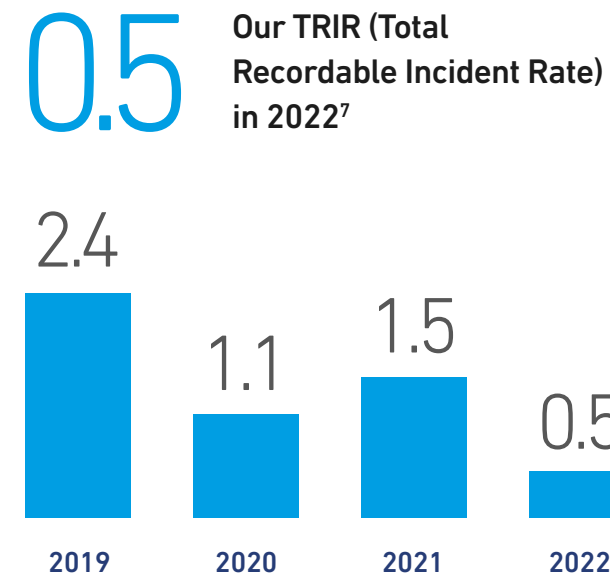
The protection and well-being of our staff and manufacturing partners is paramount to Gamechange Solar. It is a core belief that all personal injuries can be prevented, and we work closely with relevant parties to ensure the safety of people on our own sites, at our customer sites and at our manufacturing partner sites.

We regularly review and update our workplace health and safety policy, and we carefully track relevant data. Our Total Recordable Incident Rate (TRIR) continues to decrease to a low of 0.5 in 2022,⁷ down from 2.4 in 2019.

Our management takes seriously all their health and safety responsibilities. These include clearly communicating relevant policies, reviewing accident reports – and always setting a good example for their teams.

All employees are fully trained on, and required to abide by, workplace safety policy. Employees must understand their responsibilities for their own safety and those of others. Special emphasis is placed on the safety training of our field-based technical workers. All employees are expected to participate wholeheartedly in the safety program, including reporting any hazardous conditions and making suggestions to improve safety.

Our next steps will be to enhance our health and safety management process. This will include evaluating the implementation of ISO 45001, an optional international standard for health and safety at work, and enhancing objectives and KPIs including in our global locations.



⁷ US data only.



Human rights

Our ethics, conflict materials and data privacy standards

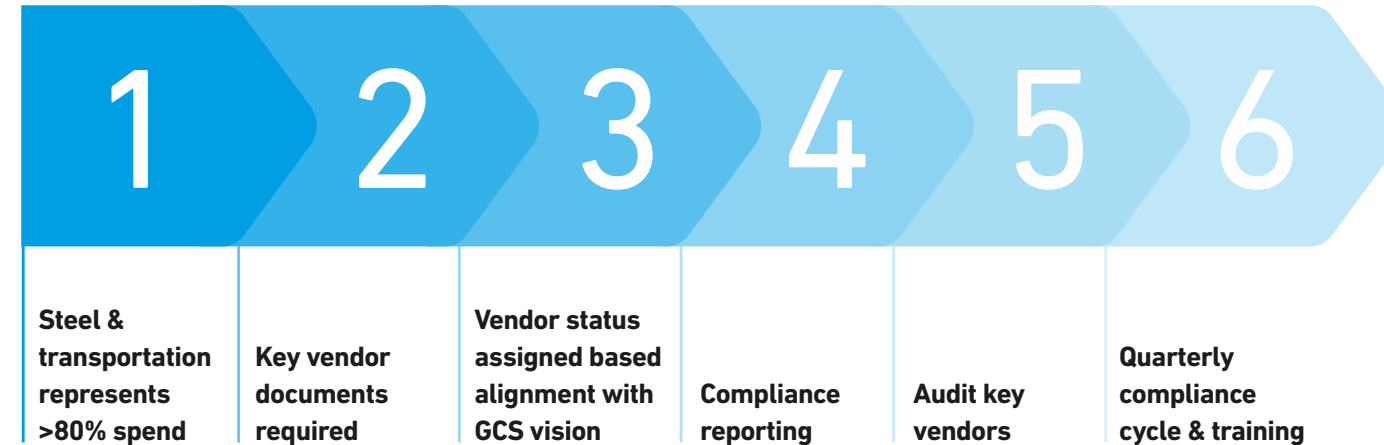
We are dedicated to upholding the highest standards of human rights throughout our own operations and supply chains.

In 2022, we completed our vendor certification of compliance and mitigation process for all existing commodity vendors. That means, as of September 2022, all active vendors were required to endorse our expected standards regarding ethics, conflict materials and data privacy. Any new vendor must agree to these standards before we commence a relationship.

We will continue to strengthen these standards by expanding the ESG considerations included in the 2023 vendor qualification process and formalising the process for non-compliance.

Furthermore, in 2022, we implemented an anonymous complaints and whistleblowing hotline run by a specialist third party. So far, we have not received any messages through the hotline.

VENDOR QUALIFICATION PROCESS



Going forward, in 2023, we will expand the hotline system to ensure all stakeholders, including customers and non-commodity vendors, have access and are able to report.

We will also be reviewing all our processes and aim to become a signatory of the United Nations Guiding Principles (UNGPs) within 2023.





Diversity, equity and inclusion

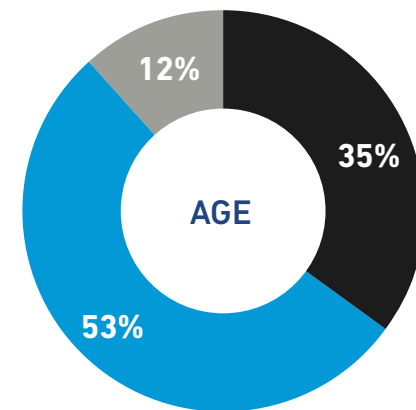
For our business to thrive, we need our people to thrive

All our employees must feel safe and respected and be treated fairly. All new employees are trained on our policies on anti-harassment, anti-discrimination and whistleblowing, among other issues.

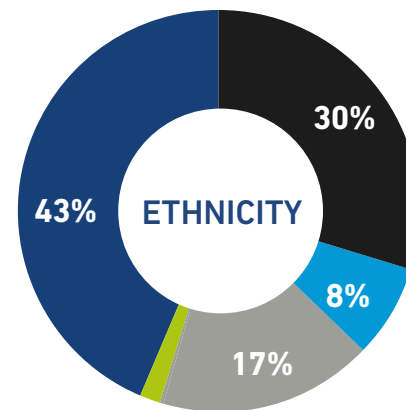
Our staff receive training on all key policies at least annually. Our policies are updated as needed and communicated in a formalized process. Our corporate whistleblower policy is monitored by a third-party provider for any reported concerns. There were no whistleblowing disclosures in 2022.

Our long-term success depends on the excellence of our employees and manufacturing partnerships. That is why we continually expand the strength of our teams by embracing diversity and inclusion. In 2023 we will develop our diversity targets and improve against our 2022 base year data. Going forward, we endeavor to make constant progress toward a variety of diversity and inclusion goals, including, but not limited to, total workforce female representation and racial and ethnic minority representation.

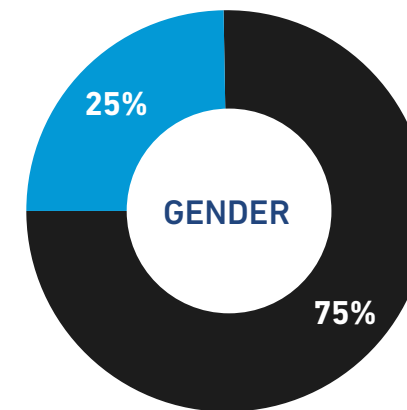
WORKFORCE DEMOGRAPHICS



- ▶ Under 30
- ▶ 30-49
- ▶ 50 and Above



- ▶ Asian
- ▶ Black / African American
- ▶ Hispanic or Latino
- ▶ Two or more nationalities
- ▶ White / Caucasian



- ▶ Male
- ▶ Female





Talent attraction and development

Our transparent and effective performance management system

We must attract a wide variety of brilliant talent to continue developing world-class, innovative and cost-effective products that are accompanied by smooth deliveries and dedicated support. So, we offer an attractive package of a competitive salary and great benefits along with a good work-life balance.

Our combination of a hybrid work model, flexible hours and a positive and fun work environment is also designed to entice, keep and nurture our talent.

It is also important that our people be promoted and compensated appropriately, based on merit. That is why, in 2022, we enhanced our performance management and compensation system.

As a young company with a relatively young team (35% are under 30 and 88% below 50), training and development are a crucial focus area. In 2022, we implemented a consistent training platform to provide learning opportunities to all staff. We also began our program of tuition reimbursement, further underlying our strong commitment to our employee's continuous learning.

In 2023 we will be rolling out our employee satisfaction survey. Going forward, we will continue to develop systems that ensure we are sensitive and responsive to our employee's needs, satisfaction levels, and training demands.

88% Of our team are under 50





Transparency and accountability

The roles and responsibilities of our ESG committee

Our ESG strategy is embedded deep within our governance structure.

The strategy is overseen by our ESG Committee, which is led by our Chief Operations Officer (COO) and also comprises our Chief Financial Officer (CFO) and our Chief Commercial Officer (CCO). To ensure clear accountability, each executive is responsible for a pillar of the strategy (governance; empower; repower; rethink).

The committee determines the overarching approach to ESG, while monitoring and incorporating best practice and international standards. The committee continually develops, implements and monitors initiatives and policies. Policies are reviewed when required and published on our website.⁸

The committee also supervises all communications on ESG issues with employees, investors and stakeholders; monitors and assesses salient developments; and works to improve the business-wide understanding of ESG matters.

The committee meets at least quarterly. During 2022 there were regular biweekly meetings as we sought to identify and develop our ESG strategy.



⁸ www.gamechangesolar.com/policies



Business ethics

Our Code of Business Conduct and Ethics policy

Since our founding we have conducted our business in an open and transparent manner, applying a zero tolerance approach to bribery and corruption at every level.

Our Code of Business Conduct and Ethics has been developed in accordance with the highest ethical principles and all applicable laws and regulations. The Code is a detailed 12-point document that lays out expected behavior on a wide range of issues. It describes, for example, our zero-tolerance approach to discrimination and harassment; our stringent health and safety standards; and the complete accuracy we demand in record-keeping and retention.

All employees must have read, understood and be in compliance with the policy. The policy should also be provided to and adhered by every agent, consultant and representative of the company.

In 2022, we set up a 24-hour third-party monitored complaints and whistleblower hotline, this has been shared with all employees and vendors, who have been appropriately trained.

In 2023, we will be rolling this out to all customers as well. So far, we have not had any responses but will continue to closely monitor and be ready to respond appropriately if needed.

Overall, these commitments are designed to ensure we conduct our business honorably. We want people to be proud to work for us and with us.

Zero

Responses on our third-party monitored complaints and whistleblowing hotline since its launch in 2022





Cybersecurity

Protecting our people and our business

To protect our people and our business, we must protect our intellectual property and the data entrusted to us by employees, customers and business partners.

That is why we partner with a top tier threat detection and response service. This service monitors our entire network and all endpoints, such as employee computers, for malicious activities, which it will investigate and remediate. Any threat will be immediately communicated to the CFO, the leader of IT, and any other staff as necessary.

We work ceaselessly to keep our business resilient and ready to respond to ever-evolving criminal techniques and geopolitical dangers. We stress-test our systems twice a year and train our staff at least annually, with any new threat communicated as necessary.



Network monitoring

Detecting malware

Stress-testing

Threat reporting

“We value the data of our customers, vendors, and employees seeking to ensure security and data is treated with utmost care.”

– MARK GIBBENS, CFO, GAMECHANGE SOLAR



LOOKING FORWARD

Advancing on our ESG journey

In the year ahead, we will continue to create a strong foundation as we prepare to gather momentum. The bedrock of all our sustainability plans is detailed, relevant and accurate information on all the issues essential to responsible business. Equipped with the right data, we can be clear about where we are, where we are going, and where we want to be.

The core of our focus for the remainder of this year will therefore be on accumulating, aggregating and analyzing data from our vendors on their social and environmental conduct. We will work closely with our vendors to collect the relevant data, including on emissions and recycled steel content. We can then establish ambitious, specific and measurable targets.

Moreover, once we have this information, combined with transportation data, we will have a near total understanding of our scope 3 emissions, and be ready to fix baselines in the future. This year, will continue to collect and track our scope 1 and 2 emission data.

More broadly, our activities will continue to be a business-wide effort and cut across social and environmental impacts. To mention but a few: on the social side, we'll be setting our diversity and equalities targets and expanding our vendor qualification criteria to include human rights. And on the environmental side we'll continue to monitor our own emissions and and continue to enhance steel efficiency in our designs.

We are grateful to all our teams, vendors and customers who have helped make 2022 such a successful year. We are looking forward to another year of repowering the planet in a responsible, respectful and sustainable way.

