



**FUNCTIONAL AREA Policy**

<b>Policy Name:</b>	<b>C-100-5 Supplier Code of Conduct &amp; Human Rights</b>
<b>Functional Area:</b>	<b>Corporate</b>
<b>Purpose:</b>	<b>To provide commitment to human rights, supporting fair labor practices and prohibiting forced labor, child labor, human trafficking, and slavery across the Company's supply chain</b>
<b>Effective Date/Revision Date:</b>	<b>September 1, 2022 / Rev November 1, 2023</b>
<b>Responsibility:</b>	<b>President &amp; COO, Phillip Vyhanek</b>
<b>Frequency:</b>	<b>Annual</b>
<b>Policy</b>	
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<b>Policy Filename:</b>	<b>C-100-5 Supplier Code of Conduct &amp; Human Rights</b>
<b>Policy File Location:</b>	<b>Team/Corporate Policy/Files</b>



## FUNCTIONAL AREA Policy

### 1. Introduction and Purpose

GameChange Solar's ("GCS") pledge is to conduct its business with the highest ethical standards, foster a safe and healthy work environment, and demonstrate ethical behavior and respect for humans right in our supply chain and local communities. GCS is committed to respecting and protecting human rights, supporting fair labor practices, and prohibiting forced labor, child labor, human trafficking, and slavery across our supply chain.

GCS is committed to complying with the laws established to protect human rights in each country where GCS operates and respecting the rights set forth in the International Labor Organization (ILO) 1998 Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights, which provide further instruction to companies dedicated to preventing adverse impacts on the communities with which they are involved.

### 2. Supplier Code of Conduct

GCS partners with its suppliers, vendors including subcontractors to achieve transparency and is focused on critical issues in supply chain management, including ethical procurement and compliance with applicable laws. GCS has a network of domestic and international suppliers supporting its global manufacturing process to support its international Customers. GCS's supplier on-boarding process ensures that GCS is provided with the highest quality materials and level of customer service to ensure that GCS's suppliers do not engage in unethical conduct.

In addition to maintaining the highest level of integrity and conducting business in accordance with both the letter and spirit of the law, GCS expects the following of its vendors and suppliers:

- **Human Rights and Respect for People:** GCS expects suppliers to share its commitment to being attentive to the human rights of others. Suppliers will not engage in human trafficking or modern slavery, use child labor, or otherwise use forced, prison or compulsory labor, or source materials that directly or indirectly finance or benefit armed groups. Furthermore, suppliers should not tolerate discrimination, harassment, or retaliation, and should provide a safe, secure, and healthy workspace.
- **Gifts and Entertainment:** Suppliers shall not engage in any form of bribery to secure or retain business and will act in accordance with all laws related to bribery and



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conflicts of interest, including the Foreign Corrupt Practices Act of the United States as highlighted in GCS policy C-500-3 Foreign Corrupt Practices Act Anti-Corruption Policy. Under no circumstance should any gift or entertainment be offered, given, or provided to any GCS employee or contractor, or any immediate family member of an GCS employee or contractor, unless such gift or entertainment is not excessive in value and is consistent with customary business practices. Individual gifts should not exceed \$25 US dollar limit.

- **Conflict Minerals:** Suppliers shall take all measures necessary to comply with the supplier expectations set forth in GCS's Conflict Minerals Policy and Section 1502 of the Dodd-Frank Act, including the establishment of policies, due diligence frameworks, and management systems of their own, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas, that are designed to accomplish this goal.
- **Transparency:** GCS expects the highest level of transparency from its vendors and suppliers. GCS will require its suppliers to attest they are in compliance with this Statement and Code of Conduct.

### 3. Policy Mandates

Respect for human rights is expressed in GCS's workplace policies and practices, including the following:

#### Freely Chosen Employment

- Employment at GCS is freely chosen. Neither GCS nor its suppliers use forced, bonded, indentured labor, involuntary prison labor or slave labor.
- GCS's associates may terminate their employment at any time, with or without notice, for any lawful reason or for no reason, subject to legal notice requirements that may otherwise be required where GCS does business.

#### Child Labor Prohibition

- Child labor is strictly prohibited and shall not be used under any circumstances.
- GCS's hiring process ensures that all associates meet the minimum age requirement set by local laws.

#### Humane Treatment



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- GCS is committed to providing a safe and engaging work environment that fosters mutual respect, trust, and growth for our associates.
- GCS does not tolerate harassment, intimidation, threats, or coercion, including any sexual harassment, sexual abuse, or corporal punishment, in the workplace by or against our associates, customers, vendors, suppliers or contractors.

### Working Hours, Wages and Benefits

- GCS compensates and offers a wide range of comprehensive benefits. Entry-level wages are at, or above, the minimum wage in all jurisdictions where GCS operates.
- GCS workweeks do not to exceed the maximum number of days and hours set by local law, and our associates are allowed at least one day off every seven days. GCS compensates overtime at pay rates greater than regular hourly rates.

### Non-Discrimination

- GCS is an Equal Employment Opportunity (EEO) employer. GCS hires, pays, and promotes based on an individual's qualifications, skills, ability to do the required work, merit, and overall potential.
- GCS does not discriminate based on sex, race, color, gender (including pregnancy), sexual preference, age, religion, national origin, disability (mental and physical), military status, genetic information, gender identity or any other classification protected by applicable federal, state, or local law.

### Freedom of Association

- GCS recognizes that in the locations where GCS operates, employees have the right to freely associate or not associate with third-party labor organizations, along with the right to bargain or not bargain collectively in accordance with local laws.
- GCS respects those rights and is committed to creating an environment of open communication where employees can speak with their managers about their ideas, concerns or problems, and work together to address workplace issues.

## 4. Reporting and Addressing Concerns



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GCS is committed to lawful and ethical behavior in all its activities and requires vendors, suppliers, and contractors to act in accordance with all applicable laws, regulations, and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. GCS encourages reporting any behavior not in line with these standards through the third party hotline.

- 1.1 GCS's hotline is managed by Lighthouse by Syntrio, an independent external provider and allows any individual of the organization to file a confidential report. Reports can be filed at any time, confidentially by several means but website is preferred.

- Primary Website: [www.lighthouse-services.com/gamechangesolar](http://www.lighthouse-services.com/gamechangesolar)

- Direct URLs:

Language Name Direct URL:

Chinese (Simplified) [www.lighthousegoto.com/gamechangesolar/csm](http://www.lighthousegoto.com/gamechangesolar/csm)

English [www.lighthousegoto.com/gamechangesolar/eng](http://www.lighthousegoto.com/gamechangesolar/eng)

French [www.lighthousegoto.com/gamechangesolar/fre](http://www.lighthousegoto.com/gamechangesolar/fre)

Spanish [www.lighthousegoto.com/gamechangesolar/spa](http://www.lighthousegoto.com/gamechangesolar/spa)

- Anonymous Reporting App: Keyword: gamechangesolar

- Toll-Free Telephone: Direct Dial

o English-speaking USA and Canada: 833-204-8780

o Spanish-speaking USA and Canada: 800-216-1288

o French-speaking Canada: 855-725-0002 2

o Spanish-speaking Mexico: 01-800-681-5340

AT&T USA Direct

o All other countries: 800-603-2869 (must dial country access code first click here for access codes and dialing instructions)

- E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)

- Fax: (215) 689-3885 (must include company name with report)

- International Callers:



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1. Make sure you have an outside line.
2. Enter the Access Code for the country and/or the telephone system you are calling from. You will then hear a 'bong'.
3. An English-language voice prompt will ask for the number you are calling.
4. Enter our toll-free number: **800-603-2869**. There is no need to dial "1" before the toll-free number.
5. You are now connected to the hotline.
6. A Lighthouse greeting will be played in multiple languages. Make a choice from the pre-recorded language prompts or press 000 and tell the English operator the language you speak (preferably in English). An interpreter will then join the call in 2-3 minutes. The Lighthouse operator will interview you, aided by the interpreter.
7. A report in English is then sent to the designated recipient(s) of your company.
8. Access codes are subject to change.

### 5. Vendor's Certification of Compliance & Mitigation

GCS requires new and existing vendors and suppliers including subcontractors to acknowledge and comply with this Human Rights Policy and Supplier Code of Conduct and their confirmation of compliance with these requirements.

GCS is committed to Human rights and compliance to this policy and any deviation will be considered a breach of contract and may be reported to the appropriate authorities.