

DECLARATION OF PROTECTING LABOR AND HUMAN RIGHTS

Belinus has always taken a strong stand on protecting the labor and human rights of everyone involved in the organization and affirms that all of its suppliers are in due and strict compliance with all the relevant laws and industry best practices.

Belinus re-emphasized its complete dedication to manufacturing products that are characteristically as clean as the energy they produce. Belinus collaborates with suppliers to ascertain that the supply chain is perfectly in tandem with all laws and international best practices in regards to all Environmental, Social, and Governance (ESG) activities, as well as forced labor.



“Achieving the excellent standards we strive to attain demands that we handle every component included in our solar modules; ranging from raw materials to human capital with utmost care.”

—Francis Rome, Chairman of the Board, Belinus Solar Bv

Belinus' Labor and Human Rights Policy stands tall as a paragon in the industry establishing clear expectations for employees, suppliers, and other business partners in terms of human rights and labor. The policy created is in total compliance, agreement, and accordance with the global human rights best practices, and criteria such as the United Nations' Universal Declaration of Human Rights, the Conventions of the International Labour Organization (ILO), and the UN Global Compact (UNGC).

The United Nations Global Compact stays as the largest corporate sustainability program in the globe, requiring signatories to agree to all humanist values, including labor rights, environmental and anti-corruption concerns, and societal aims.

Belinus' policy, in particular, outlaws harsh treatment of workers and any form of conscripted or coerced labor, and rejects restrictions on free speech, expression, thought, awareness, and religion, as well as other human rights provisions by its employees and supply chain partners.

What does our supply chain look like?

Solar panel manufacturing is a complicated process that involves numerous material and labor providers. The work entails not only production, but also logistics, services, and a well-established supply chain of goods and materials for solar panels and related items.

How We Assess Our Supply Chain

Belinus views its supply chain partners as an outgrowth of the company and evaluates their performance regularly. Belinus requires all material suppliers to demonstrate their commitment to the company's Global Human Rights Policy and to attend annual supplier training. Non-attendance is intolerable and never an option, and providers that fail to show up may have their contracts revoked.

Suppliers must recognize their duty to follow our Human Rights Policy and Code of Conduct in their Master Service Agreements and Belinus' Supplier Sustainability Guidelines. Suppliers must keep track of all information relevant to their human rights compliance and give updates and

yearly assessments upon request.

Belinus also actively attempts to defend its workers' rights by putting our Human Rights Policy in local languages throughout our facilities and supplier sites, as well as widely publicizing the company's Compliance and Ethics Helpline.

Recognizing the complexities of the solar supply chain, the firm recently launched a new initiative with our suppliers to track the traceability of its raw materials.

How are we doing?

Human rights violations are treated as a breach of contract at Belinus. In the stakeholder letter, it is stated:

"Any alleged violations of our Labor and Human Rights Policy are taken seriously by us, and any infractions will result in termination."

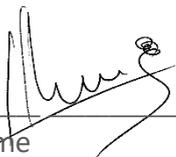
When problems have occurred in the past, we have conducted a formal inquiry and terminated vendors. There are currently no examples of non-compliance with human rights and fair labor problems, either within our internal operations or within our supply chain.

We continue to monitor existing and new rules as well as industry best practices, in addition to having a zero-tolerance stance for any abuses of human and labor rights. As circumstances dictate, we will continue to improve our internal policies and procedures and engage with suppliers to guarantee continuous compliance with all applicable laws, regulations, and best practices.

If any future high-risk countries get discovered, we will invest our efforts across our value chain to reduce risks to a bare minimum using our multi-step risk management approach and, if necessary, engage professionals, both internally and externally, to assist in risk control actions.

All the employees, contractors, and suppliers here at Belinus are all encouraged to collaboratively join the fight for human rights and against their violation. A Compliance and Ethics Helpline is available 24/7 for all stakeholders both internal and external to anonymously report any of their concerns or infractions.

Belinus Solar Bv
Kapeldreef 60
3001 Leuven
Belgium
Tel.: + 32 16 91 03 14
E-Mail: info@belinus.be



Francis Rome
CEO
Leuven, 01/2021

Annex: Belinus Labor and Human Rights Policy

Belinus is dedicated to safeguarding human rights, ensuring fair labor practices, and tackling the hazards of forced labor, child labor, human trafficking, and slavery across our supply chain. Belinus acknowledges the values enshrined in the International Labour Organization's (ILO) 1998 Declaration on Fundamental Principles and Rights at Work and is dedicated to abiding by the laws enacted to protect human rights in any country where we do business. Compliance with applicable legislation is a requirement of Belinus' supplier agreements.

Belinus supports the Solar Energy Industries Association (SEIA) Solar Industry Commitment to Environmental & Social Responsibility ("Solar Commitment"), as well as the Responsible Business Alliance ("RBA"), formerly the Electronics Industry Citizenship Coalition ("EICC"), Code of Conduct, as part of our commitment to continuous progress of environmental and social responsibility in the solar industry.

Freely-Chosen Employment

Belinus employees can choose whether or not they want to work there. We don't utilize involuntary jail work, forced, bonded, or indentured labor, or slave labor. Belinus associates may be terminated at any time, with or without notice, for any valid cause or no reason, subject to any legal notification requirements that may be necessary for the locations where we conduct business.

Child Labor Prohibition

Child labor is illegal and should not be used under any circumstances. Belinus' employment process assures that all of its employees are at least the legal minimum age.

Humane Treatment

Belinus is dedicated to creating a safe and enjoyable work environment for our employees that promotes mutual respect, trust, and development. Harassment, intimidation, threats, or coercion in the workplace by or against our employees, customers, vendors, suppliers, or contractors will not be tolerated.

Working Hours, Wages, and Benefits

Belinus pays colleagues competitively in comparison to the local labor market and provides a complete benefits package. In every jurisdiction where we operate, entry-level pay is at or above the minimum wage. Our associates are permitted at least one day off every seven days, and our workweeks do not exceed the maximum stipulated by local law. Belinus pays overtime at a higher rate than the standard hourly rate.

Non-Discrimination

Belinus is an Equal Opportunity/Affirmative Action (EEO) employer. We hire, pay, and promote people based on their credentials, skills, ability to perform the work, merit, and overall potential. We do not discriminate based on sex, race, color, gender, sexual preference, age, religion, national origin, mental or physical impairment, military status, genetic information, gender identity, or any other classification protected by federal, state, or municipal law.

Freedom of Association

Belinus recognizes that employees in the locations where we operate have the freedom to join or

not join third-party labor groups, as well as the ability to bargain collectively or not bargain collectively in line with local legislation. Belinus respects those rights and is committed to fostering an open communication environment in which employees may share their ideas, concerns, and difficulties with their supervisors and work together to resolve workplace issues.

No Retaliation

Belinus believes that every employee should be able to ask questions, express concerns, and file complaints about treatment that they believe is unfair, unethical, harassing, or discriminatory. Belinus forbids any kind of retaliation against an associate for voicing a concern or filing a complaint within the organization, or for filing a formal claim against Belinus, or for communicating with an outside agency. Belinus has established an Ethics Hotline to allow associates to communicate severe legal, financial, and ethical concerns anonymously and confidentially.