



First Solar Conflict Minerals Policy

First Solar, Inc. (“First Solar”) is committed to responsible sourcing and operating a supply chain free of “conflict minerals”, which include cassiterite, columbite-tantalite (colton), gold and wolframite and their derivatives, tin, tantalum, and tungsten (or any other mineral or its derivative determined by the Secretary of State) which are sourced from the eastern Democratic Republic of the Congo (“DRC”) or an adjoining country (together, the “Conflict Region”) whose extraction and trade are financing conflict in the Conflict Region. We support the goals established under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (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 or security forces that illegally control or tax mine sites, transport routes, trade points, or any upstream actors in the supply chain. Similarly, First Solar has a no tolerance policy with respect to corruption, money-laundering, and bribery. Our policy is communicated to our suppliers and is incorporated into supplier contracts. First Solar requires all direct suppliers to agree to and follow these principles.

First Solar recognizes that avoiding the sourcing of all minerals from these areas would cause a de facto embargo with serious adverse impact on the living conditions of local populations in the Conflict Region. Therefore we will not prohibit minerals from the Conflict Region when they are sourced in accordance with accepted international standards, specified under the Organization for Economic Co-operation and Development’s (“OECD”) guidelines.

First Solar is committed to complying with the reporting obligations required under Section 1502 of the Dodd-Frank Act and the SEC’s rules on conflict minerals, including the requirement to conduct inquiries and, if necessary, due diligence into the source and chain of custody of any conflict minerals included in our products.

In support of this policy, First Solar will:

- Exercise reasonable country of origin inquiries and due diligence with relevant suppliers in accordance with the OECD guidelines and require our suppliers to do likewise.
- Expect our suppliers to cooperate in providing information to confirm our supply chain is free of conflict minerals or sourced responsibly in accordance with internationally recognized due diligence guidance.
- Expect our suppliers to comply with the Electronic Industry Citizenship Coalition (“EICC”) Code of Conduct.
- Encourage suppliers to source from the [Conflict Free Smelters \(“CFS”\) program](#), when possible.
- Comply with the reporting obligations by publicly filing reports with the SEC.
- Reserve the right to take appropriate actions up to and including identifying an alternate source of supply or discontinuing purchases from a supplier should a supplier’s efforts to comply with this policy be deficient.

First Solar has a long-standing commitment to conducting business in compliance with applicable laws and regulations and in accordance with the highest ethical principles. We will continue to work with our suppliers to ensure they conduct their business in line with First Solar values.