



# LABOR AND HUMAN RIGHTS POLICY

## 1. OUR COMMITMENT

First Solar 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.

First Solar is committed to complying with the laws established to protect human rights in each country where we operate and respecting the rights set forth in the International Labour 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. ASSOCIATE AND SUPPLIER COMPLIANCE

First Solar has established minimum requirements for our associates and suppliers in the areas of environmental, health and safety, labor standards, human rights and business ethics. We make our Labor and Human Rights Policy (this “Policy”) available to all our associates. This policy applies to everyone at First Solar and its affiliates, including all associates, officers, and directors. As a member of the Responsible Business Alliance (“RBA”), we implement the RBA Code of Conduct within our operations and our supply chain.

- a. **Local Compliance and Beyond** – First Solar’s supplier agreements require compliance with applicable laws and regulations in addition to First Solar requirements, which may exceed local legal requirements. Violation of any labor standards may result in the termination of First Solar’s business relationship with such party.
- b. **RBA Code of Conduct** – Under the terms of First Solar’s supplier agreements, suppliers must commit to comply with the RBA Code of Conduct and require their suppliers to do the same. Suppliers must also represent, warrant and covenant that they will not use child, slave, prisoner or any other form of forced or involuntary labor, or engage in abusive employment in the supply of goods or provision of services.

## 3. POLICY MANDATES

Respect for human rights is expressed in our company’s workplace policies and practices, including the following:

### **Freely-Chosen Employment**

- Employment at First Solar is freely chosen. Neither we nor our suppliers use forced, bonded, indentured labor, involuntary prison labor or slave labor.

- First Solar 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 we do business.

#### **Child Labor Prohibition**

- Child labor, as defined in the Responsible Business Alliance Code of Conduct, is strictly prohibited and shall not be used under any circumstances.
- First Solar’s hiring process ensures that all associates meet the minimum age requirement set by local laws.

#### **Humane Treatment**

- First Solar is committed to providing a safe and engaging work environment that fosters mutual respect, trust and growth for our associates.
- We do 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**

- First Solar compensates associates competitively relative to the local labor market and offers a wide range of comprehensive benefits. Entry-level wages are at, or above, the minimum wage in all jurisdictions where we operate.
- First Solar 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. First Solar compensates overtime at pay rates greater than regular hourly rates.

#### **Non-Discrimination**

- First Solar is an Equal Employment Opportunity (EEO) employer. We hire, pay and promote based on an individual’s qualifications, skills, ability to do the required work, merit and overall potential.
- We do 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**

- First Solar recognizes that in the locations where we operate, 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.
- First Solar 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

First Solar is committed to providing a safe, confidential and accessible grievance channel to all individuals impacted by our operations.

### No Retaliation

- First Solar believes that every associate should be free to ask questions, raise concerns and make complaints about treatment they believe is improper, unfair, unethical, harassing or discriminatory.
- First Solar strictly prohibits any form of retaliation against an associate merely for expressing a concern or making a complaint within our company, or for bringing a formal claim against First Solar, or communicating with an outside agency.
- We do not tolerate retaliation of any kind against anyone who reports an issue, nor do we tolerate unlawful threats, intimidation, physical or legal attacks against human rights defenders in relation to our operations.

### Third Party Reporting

- First Solar has established a third-party operated Ethics Hotline to provide an anonymous and confidential solution to communicate serious legal, financial, ethical or human rights concerns. The Ethics Hotline ensures that serious concerns are heard and are acted upon immediately.
- Any associate, employee of First Solar, supplier and other external stakeholder can report concerns toll-free via our [Ethics Hotline](#).

### Internal Mitigation

- We conduct audits on new and high-risk suppliers for their adherence to the RBA Code of Conduct and publicly report on the environmental and social performance of the suppliers we audit. We work with suppliers to drive improvements and to remedy adverse impacts.

# ANNEX 1

Code of Conduct: Relentless Integrity: How We Conduct Business Ethically

# ANNEX 2

Compliance Reporting Website