

## FORCED LABOUR AND HUMAN TRAFFICKING PREVENTION

Forced labor is any work or service that is exacted from any person under threat of any penalty and for which that person has not offered themselves voluntarily.

### Our Position

Recom Technologies completely rejects forced labour and all forms of modern slavery including human trafficking. In particular, this includes work performed involuntarily by people under threat or penalties or other disadvantages (such as debt bondage or involuntary prison labour). Recom Technologies prohibits the use of all forms of compulsory labor, including prison labor, indentured labor, bonded labor, slave labor and any form of human trafficking. We further commit to work with our global supply chain to create conditions so that no workers pay for their job and workers have control of their travel documents and have full freedom of movement. At Recom Technologies we ensure all workers are informed, in a language they understand, of the basic terms of their employment before leaving their country of origin. Suppliers will employ all employees under their own free will with no one being subjected to bonded or forced labor. This policy applies to not only the supplier's business operations but also those of their supplier network with which the company conducts its business. Suppliers are prohibited to procure raw material from banned areas and entities that are in sanction lists.

### Specific References

In particular, Suppliers are obliged to conduct extensive due diligence to ensure that none of the components or materials comprising its products originate from the following suppliers: Hoshine Silicon Industry (Shanshan) Co., Ltd, Xinjiang Daqo New Energy Co., Ltd, Xinjiang East Hope Nonferrous Metals Co., Ltd, Xinjiang GCL New Energy Material Technology Co., Ltd, Xinjiang Production and Construction Corps (XPCC), and none from their suppliers in the upstream level is included in the UFLPA Entity List, as mentioned in the following link: <https://www.dhs.gov/uflpa-entity-list>.

Recom Technologies does not tolerate any form of Forced Labor and requires its Suppliers to comply with all applicable international laws and regulations. These laws include but are not limited to the following:

- United States Uyghur Forced Labor Prevention Act (UFLPA)
- United States UFLPA Entity List
- United States The California Transparency in Supply Chains Act - United Kingdom The Modern Slavery Act 2015
- Germany The Lieferkettengesetz / Supply Chain Act
- Norway The Norwegian Transparency Act (Åpenhetsloven)
- France The Duty of Vigilance Law
- Australia The Modern Slavery Act 2018

### Implementation Mechanisms

Recom Technologies Code of Ethics and Business Conduct is available at all times to all employees on the intranet and also to third parties on the Internet, and is continuously communicated in digital and print media as well as at internal company events. Regular training on the Code of Ethics and Business Conduct is mandatory for all employees, regardless of their hierarchical level. Additionally, members of senior management confirm their knowledge and responsibility with regard to the Code of Ethics and Business Conduct each year, based on the risks that affect them.

Recom Technologies has also specially formulated the Supplier Code of Conduct. This details our expectations regarding the attitude and conduct of business partners in their corporate activities, particularly with regard to suppliers. The requirements are regarded as the basis for successfully shaping the business relationship between Recom Technologies and its partners. They include observance of human rights, such as the prohibition of child labour, human trafficking and slavery, as well as ensuring environmental protection and preventing corruption.

In addition to the Supplier Code of Conduct, there are further product-specific requirements to which suppliers must adhere. These are set out in specifications and prescribe how certain products are to be produced. Such requirements are also binding for the affected suppliers.

### Disciplinary Actions

Violations of this policy may lead to disciplinary action up to, and including, termination of employment/partnership. Recom Technologies shall take immediate and effective measures to prevent and eliminate any forced labour and human trafficking.

### **Complaints Procedure**

Our complaints procedure enables us to identify and deal with critical concerns at an early stage and to uncover and end potential human rights violations or risks. In the event of suspicion of potential misconduct within Recom Technologies or at suppliers, associates, as well as customers and business partners, and other third parties can submit a report to Recom Technologies.

Employees have the opportunity to report misconduct by employees or suppliers around the clock, 365 days a year.

Reports are accepted by email at [ethics-humanrights@recom-tech.com](mailto:ethics-humanrights@recom-tech.com).

Written reports can be submitted in all languages by email.

RECOM TECHNOLOGIES  
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