

Statement of Conformity Modern Slavery Act 2015

On October 29, 2015, the Modern Slavery Act (the "Act") entered into force. Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as defined in the Act. The Act promotes the abolition of modern slavery and human trafficking and impels organisations to prevent modern slavery in their business and their supply chains. Its principal purpose is to consolidate existing legislation regarding criminal offences relating to slavery, including human trafficking, forced labour and other forms of exploitation.

Recom Technologies Statement

Recom Technologies is a renewable energy company with presence in the global solar industry. It produces modules, cells, inverters, hybrid storage systems, batteries and EV chargers and it works with leading global research institutions and manufacturers to innovate, develop, share and commercialize the latest technological advances in solar module manufacturing.

Recom Technologies including subsidiaries, parent or affiliate companies ("Recom Technologies") are committed to upholding principles of the Modern Slavery Act 2015 (hereafter the "Act"). We maintain a zero-tolerance approach towards modern slavery and human trafficking and seek to ensure we avoid and reduce the risk of supporting modern slavery and human trafficking through a variety of measures. We acknowledge that risks arising from modern slavery and human trafficking can apply anywhere within our operations and supply chain, whether through the supply of materials, direct employment or sub-contracted employees.

Steps for the Prevention of Modern Slavery

I. Due diligence processes. As part of our initiative to identify and mitigate risk we are taking steps to put in place systems to:

- (a) identify and assess potential risk areas in our supply chains;
- (b) mitigate the risk of slavery and human trafficking occurring in our supply chains;
- (c) monitor potential risk areas in our supply chains; and
- (d) protect whistleblowers.

II. Commitment by Suppliers. Recom Technologies expects suppliers to fully obey all national laws and regulations applicable in the country and other governmental authorities of any country in which they do business, and to treat the workforce fairly and with respect. To ensure suppliers respect and enforce our standards, we include a clause in the respective agreement governing the contractual relationship between Recom Technologies and its suppliers, which stipulates that our suppliers and their respective suppliers must abide by our Supplier Code of Conduct and with all applicable laws and regulations, including national and international laws prohibiting any kind of forced and bonded labor (such as slavery and human trafficking).

III. Internal Accountability and Trainings. Recom Technologies provides regular internal trainings and constant advice to help procurement employees and Directors to ensure compliance on anti-slavery policies so the risks can be proactively managed. They are educated to recognise modern slavery and human trafficking in our business and supply chains and are encouraged to report any potential breach of the Act and any potential violation of human rights. In particular, Procurement Department maps the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking, ensuring that the none of the products or their components originate from 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 supplier is included in the UFLPA Entity List, as mentioned in the following link: <https://www.dhs.gov/uflpa-entity-list>.

In addition, Recom Technologies provides advisory services to its suppliers in order to strengthen the relationships with them and build more sustainable capacities within their factories.

IV. Audits. Recom Technologies may audit certain of its approved suppliers to monitor compliance with the Supplier Code of Conduct and reserves the right to terminate the business relationship if violations of the law or basic international principles related to labor standards or ethical business practice become apparent. In particular, Recom Technologies conducts third-party audits of select suppliers through on site inspections. The audits may be announced or unannounced and are conducted in dependence of the respective standard's re-audit cycle.

Violations

Recom Technologies aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of actions taken to comply with this policy. Disciplinary measures will be taken against anyone engaging in such retaliation against a report made in good faith, as per our Code of Conduct and Business Ethics.

RECOM TECHNOLOGIES
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