

Sustainable Supply Chain and Conflict Minerals Policy

sonnen Holding GmbH

REV01 – Oct. 20th 2021

In accordance with our Shell General Business Principles and Group Code of Conduct, sonnen Group companies seek to work with suppliers who contribute to sustainable development and are economically, environmentally and socially responsible.

We will develop and strengthen relationships with suppliers who are committed to the principles set out below or to similar standards through their own activities and the management of their own suppliers and sub-contractors.

Suppliers should provide workers with a dedicated whistle-blowing mechanism where grievances related to below topics can be logged confidentially.

Supplier performance in Sustainability and Conflict Minerals areas will be assessed against our requirements during on-site visits and performance review meetings. If violations or gaps are identified, sonnen will work closely with suppliers to help them improve their management systems and operations. If a supplier is unwilling or unable to meet our requirements, we may decide to remove it from our supply chain.

CONFLICT MINERALS

sonnen is committed to sustainability and conflict-free sourcing to ensure environmentally and socially responsible business operations. sonnen expects our suppliers to operate as follows:

Under the USA's Dodd-Frank Act, Section 1502, US-listed companies are required to disclose to the Securities and Exchange Commission (SEC) and the public whether any of their global products sold during the year contain Covered Minerals and whether Conflict Minerals are either necessary for the functionality or for the production of such products. These minerals are cassiterite (tin), columbite-tantalite (tantalum), gold and wolframite (tungsten) ("Covered Minerals"). If the Covered Minerals are sourced from any of the following countries: Democratic Republic of the Congo ("DRC"), Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia ("Conflict Countries") they are considered "Conflict Minerals".

Although not listed as a conflict mineral in the US Dodd-Frank Act, sonnen is expanding the above list on its own initiative to include the mineral lithium and all compounds in which lithium is contained. All set requirements should therefore apply equally to lithium.

sonnen, being a fully consolidated subsidiary of Royal Dutch Shell plc since 2019, is committed to responsible sourcing of Conflict Minerals and has established a due diligence framework in line with the <u>Organisation for Economic Co-operation and Development (OECD) guidance for responsible sourcing in mineral supply chains</u> to identify and mitigate risks in our supply chains. sonnen does not directly source minerals from smelters and refiners, and thus collaborates closely with its upstream suppliers to ensure transparency and compliance with the legislation. All sonnen suppliers are expected to adopt the policies and management systems with respect to Conflict Minerals imposed by sonnen, and to exercise due diligence with their own suppliers.

Suppliers are required to ensure that the products supplied to sonnen do not contain Conflict Minerals, or in case the products contain Conflict Minerals, these

- do not originate from Conflict Countries; and
- if Conflict Minerals originate from a mine in a Conflict Country the mine has been verified by an independent third party private sector audit to be conflict-free; or
- the Conflict Minerals originate from scrap; or
- from recycled sources.

BUSINESS INTEGRITY

Suppliers comply with all applicable laws and regulations.

Suppliers should not tolerate, permit or engage in bribery, corruption or unethical practices.

Suppliers support fair competition. Conflicts of interest are avoided.

HEALTH, SAFETY, SECURITY, ENVIRONMENT (HSSE) & SOCIAL PERFORMANCE (SP)

Suppliers have a systematic approach to HSSE & SP management designed to ensure compliance with all applicable laws and regulations and to achieve continuous performance improvement.

Suppliers:

- are committed to protect the environment in compliance with all applicable environmental laws and regulations;
- use energy and natural resources efficiently;
- continually look for ways to minimise waste, emissions and discharge of their operations, products and services;
- respect their neighbours and contribute to the societies in which they operate
- manage the social impacts of their activities carefully and enhance the benefits to local communities
- recognize that regular dialogue and engagement with stakeholders is essential. In interactions with employees, business partners and local communities, seek to listen and respond to them honestly and responsibly.

LABOUR AND HUMAN RIGHTS

Suppliers conduct their activities in a manner that respects human rights as set out in the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organization (ILO) including ensuring:

- no use of child labour
- no use of forced, prison or compulsory labour
- no payment of recruitment fees by workers

- Compliance with all applicable laws and regulations on freedom of association and collective bargaining
- a safe, secure and healthy workplace and not tolerating discrimination, harassment or retaliation
- Compliance with all applicable laws and regulations on working hours
- providing wages and benefits that meet or exceed the national legal standards.

MAKING LOWER-CARBON CHOICES

sonnen commits to supply the world with clean energy. We continually work with our suppliers to find ways to reduce greenhouse gas emissions across our supply chains.

We also utilized a new interactive tool for suppliers to set a target and track, among other things, their emissions performance against other suppliers to Shell in their industry. The Shell Supplier Energy Transition Hub was created in collaboration with 50 of our major suppliers, who began trialling it in 2020. We expect to roll it out to other suppliers starting in 2021.

REDUCING WASTE

We are working with our suppliers to help develop a circular economy, where battery from our end of life products are recycled or reused.

Suppliers are also playing an important role in recycling materials when we decommission projects.

We are also supporting this change to a circular economy through our procurement choices, which are the type of responsible commercial decisions that customers expect us to make.

REPORTING

sonnen encourages all suppliers to actively share their efforts such as sustainability reports, audit certificates or other related documents. This exchange is meant to strengthen the dialogue as well as sharing of best practices. The communication may happen via known contact persons throughout the company or directly via <u>sustainability@sonnen.de</u>.

GLOBAL HELPLINE

If suppliers seek advice on any matter relating to the Code of Conduct or wish to report a concern, they can contact the Global Helpline, available at <u>https://shell.alertline.eu/gcs/welcome</u>. This is available 24 hours a day, seven days a week, via a telephone and through the internet, and staffed by an independent third party who are able to provide assistance in multiple languages. The reports may be submitted via call or anonymously if wished.

The Global Helpline enables sonnen stakeholders to raise concerns or dilemmas, or to seek advice on a matter related to compliance with the law and our business principles (SGBP) and Code of Conduct, in full confidence and without fear of retaliation. The Global Helpline is for all employees and contract staff in sonnen and for third parties with whom sonnen has a business relationship (such as customers, suppliers, agents) if they observe wrongdoing by a sonnen company or employee. This facility is not for customer service complaints or enquiries. The Helpline is executed by the parent Shell Global Helpline.

OTHERS

sonnen's suppliers are expected to adhere to the guiding principles contained in the Shell General Business Principles, available at <u>www.shell.com/sgbp</u>.