

Our human rights & climate policy

As manufacturer of solar mounting products, we at Sunbeam are proud to literally support the growth of solar energy in the building environment. Besides contributing to such a necessary and honourable industry, our ambitions lie in doing so, whilst having no negative impact, and preferably more positive impact on society.

Therefore, Sunbeam's future vision is 'To, by 2040, enable climate-neutral-produced mounting of solar panels, whilst improving local wealth & biodiversity and pursuing climate and human rights.'

Our commitment

Sunbeam acknowledges its responsibility to identify, prevent and address actual and potential adverse impacts on people, the environment, the climate and biodiversity across all aspects of our operations and value chains. We are committed to conducting our business with integrity and care, by actively working to avoid contributing to negative impacts, and remedying them where they occur. This commitment extends beyond our own operations to include our supply chains and other business relationships.

Sunbeam is committed to respect and support all human rights expressed in the [International Bill of Human Rights](#), the climate goals set out in the [Paris Agreement](#) and the principles concerning fundamental rights set out in the [ILO Declaration on Fundamental Principles and Rights at Work](#). Our approach to implement this policy is by adhering to the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) and the [UN Guiding Principles on Business and Human Rights](#), when conducting business and due diligence.

Our collaborations

As we are contributing to working groups and activities in **Holland Solar**, the **IRBC Agreement for the Renewable Energy Sector (REA)**, the **Solar Reuse Systems initiative** and student internships, we:

- contribute to fruitful discussions on subsidies, procurement requirements and collective ambitions on the improvement of climate and social impact of solar projects and related products.
- partner up with others in our sector, to increase shared leverage and organise actions on decreasing environmental/human rights risks in the international value chain, such as in mines and installations
- are involved in setting up a (dutch) reuse system / service for solar mounting products invest in the innovation of design, focused on emission reductions, biodiversity enhancing, reuse-promotion or biobased material sourcing.

Furthermore, we are assessed and certified by the **Renewable Energy Agreement**, Ecovadis and Ecocert and included in the **Nationale Milieu Database**, by which we:

- annually monitor our due diligence processes on social and environmental impacts
- publicly share our Environmental Product Declarations and promote the calculation and tracking of GHG-emissions
- offset remaining GHG-emissions via certified **Gold Standard** or **Verra VCS projects**.

Our process

We embed and conduct ongoing due diligence processes within this policy and our organisation. Sunbeam employs a **CSR manager**, embeds a company specific **climate(-emissions) strategy & monitoring** and expects proper worker rights from their (mainly European) suppliers. (1)

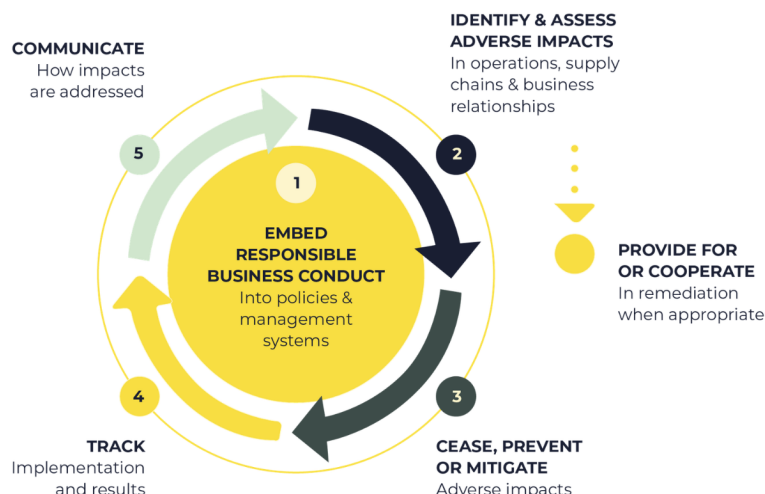
We **engage meaningfully with our own employees, our suppliers and external contacts in the cross-sectorial organisations we take part in**, and, when helpful, share our supply chain lists transparently. We draw on our and their internal and publicly available insights/raised concerns and monitoring to conduct efficient but thorough risk assessment. (2)

We use our minimal leverage with suppliers and business partners to promote responsible practices and address adverse impacts. **In several organisations, we collaborate to drive positive change and minimise negative impacts.** We exchange knowledge, build influence, and contribute to solutions for complex ESG challenges. In 'our focus' and our CSR reports we elaborate on these actions. (3)

We undergo (annual) independent **audits via the Anthesis – Climate Activator Standard, the assessment of the REA and the Ecovadis certification.** Employees can report issues through dedicated internal mechanisms. Clients and suppliers can reach out through our support and communications platforms. Rightsholders can also raise concerns through the shared grievance mechanism of the International RBC Agreement for the Renewable Energy Sector. (4)

In **our yearly CSR report**, we communicate about our assessed risks and our targets, actions and performance on the efforts of mitigating these risks in our value chain. (5)

If we come to learn about our direct contribution in failing to uphold the rights of people in our value chain, we will seek to provide remediation when appropriate. For instance, we do **offset all our calculated GHG emissions linked to our business.** And we will again apply our (limited) leverage to cease the risk of recurring. We see disengagement as a last resort. When suppliers or partners fail to address serious issues despite dialogue and warning, we are committed to responsible disengagement that prioritises harm reduction and respects the rights of affected people.

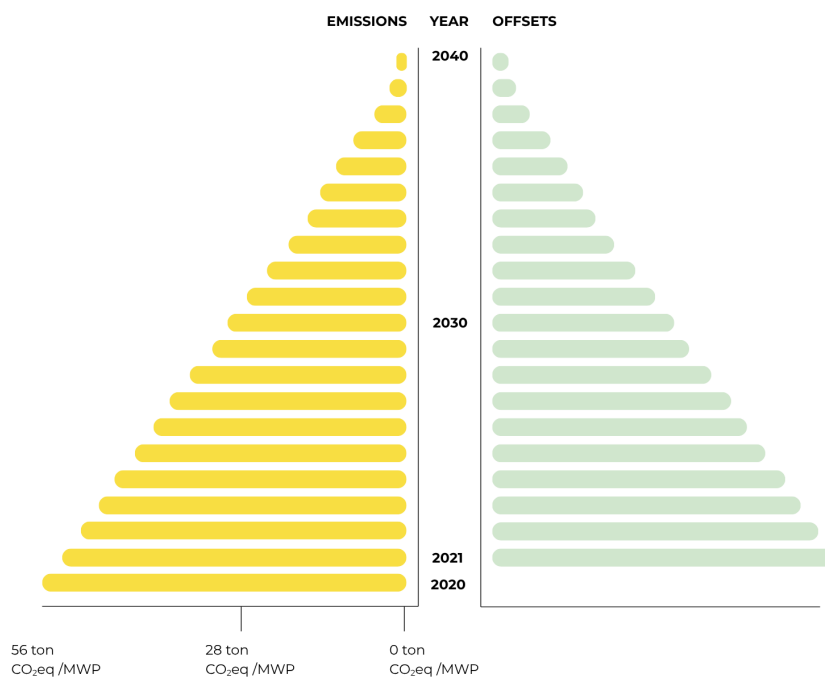


Our focus

We focus our due diligence efforts on the most salient impacts and risks connected to our value chain. As the majority (>95%) of our production-mass lies in our, by design, specified orders for production of steel-, aluminium- and plastics-components, we **focus our efforts on the impact of these materials** and their accompanying supply and logistics value chain. While still included in our emissions reports via public averaged data, we contemporary omit targeted risk assessment and actions on small sized or international markets for purchased goods (as bolts and screws).

Climate Change and Net-Zero by 2040

Since 2021, we commit to report and independently audit our GHG-emissions and evaluate our minimal (3,5%) and ambitioned (5%) KPI of emission-reduction per year, annually. Even more, Sunbeam commits to offset remaining GHG-emissions via certified Gold Standard or Verra VCS projects. We have set ambitious but gradual reduction targets and objectives to aim to be net-zero by 2040 and to therefore be in line with the international target for net-zero in 2050.



We seek suppliers and partners that are (working to be) frontrunners in sustainable and climate neutral practices. And with our code of conduct, we seek assurances of suppliers and other business partners aimed at shared responsibility for care of the environment. Currently, we reduce our products' emissions by:

- only using recycled plastics and rubbers in the production of our designed plastic product components.
- switching towards aluminium supply that uses high contents of recycling scrap in production.
- offering Supra ReSourced. Made of steel produced with high contents of recycling scrap and renewable energy. Resulting in an emission reduction of more than 50%.
- having all our transport-orders drive with the biofuel 'HVO'.

Minimise Use of Resources & Waste – R&D

As for our metal components, the mining of virgin bauxite and iron comes with a risk for resource depletion and for ecological threats on ecosystems in/on land and water, when done in risk countries.

We expect our suppliers to avoid and address these risks in their supply chain management, to mitigate, compensate and minimise unavoidable effects and to provide adequate education and training to workers in safety, health and environmental matters, including on the management of waste. We review suppliers' value chain impacts annually with independent public sources to expose risks and steer our sourcing decisions. In our direct design and value chain, we aim to minimise the use of these resources and to:

- ensure that the entire life cycle of the product is considered at all design stages to minimise material usage, energy consumption and waste emissions.
- produce and design with recyclable, high quality materials with warranties assuring a solar mounting lifespan of 15 years or more and a strong potential for reuse applications.
- gradually grow the percentage of recycled scrap content in our steel and aluminium orders, as to reduce the resourcing needs for newly mined metals.
- fully integrate separation- and recycling-activities into all internal practices (warehouse and office) and no usage of hazardous chemicals.

Human rights far upstream the supply chain

As our direct operations and tier 1 suppliers are based in the EU—where regulatory frameworks offer protection—we recognise that severe (linked) risks will mainly lie further upstream or downstream. We acknowledge the risk for forced labour, for lack proper labour rights / fair wages or OHS-risks in the mining and processing of raw materials such as iron ore and bauxite potentially located in Liberia, Ukraine, Kazakhstan, Brazil, USA and Mexico. We will apply our (limited) leverage, through sectoral initiatives, to help strengthen monitoring and improvements across the value chain.

Worker Welfare (downstream installation)

(Migrant) workers in the installation of solar panel fields on roofs are known to be at risk of being denied the proper Labour Rights, Freedom of Association or Fair Wages. We integrate worker welfare considerations into product design and installation methods, and we draw on tools such as the IRBC Agreement's Worker Welfare Toolbox to support our clients in promoting ethical labour practices.

This policy statement and our sustainable strategy is made and annually reviewed with and on behalf of the board of Sunbeam BV and shall be overseen at board level by Rogier van Kaam. The policy is put into practice under the shared responsibility of our CSR Manager and the executive decisionmakers of the relevant departments.

Luuk Eeftink
ESG Manager



Rogier van Kaam
CEO