



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. 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.
- c. **Due Diligence**- We conduct due diligence in accordance with the UN Guiding Principles on Business and Human Rights and the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, to identify, prevent, mitigate and account for potential adverse human rights impacts to people across our operations and supply chain.

1. POLICY MANDATES

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

Prohibition of Forced Labor

- Employment at First Solar is freely chosen. Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted in our operations or our value chain.
- 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.
- First Solar is committed to, and we require our suppliers to commit to, the “Employer Pays Principle,” which means workers shall not be required to pay employers’ agents or sub-agents’ recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.
- First Solar, our suppliers, agents and sub-agents may not hold (for safekeeping) or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Documentation may only be temporarily held if necessary to comply with the local law to complete administrative or immigration processing.

Child Labor Prohibition

- Child labor, as defined in the RBA 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.
- Workers under the age of 18 (young workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

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, mental or physical coercion, harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse or corporal punishment, bullying, public shaming, or verbal abuse 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. All Associates receive equal pay for equal

work and qualification. 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. All overtime is voluntary and First Solar compensates overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure is not permitted.

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, ethnicity or national origin, disability (mental and physical), military status, political affiliation, union membership, genetic information, gender identity or expression, marital status (or any other classification protected by applicable federal, state or local law) in hiring and employment practices such as wages, promotions, rewards, and access to training. We provide Associates with reasonable accommodation for religious practices and disability.

Freedom of Association and Collective Bargaining

- Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues.
- 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. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.
- First Solar respects those rights and is committed to creating an environment of open, two-way communication where employees can speak with their managers about their ideas, concerns or problems, and work together to address workplace issues, without fear of discrimination, reprisal, intimidation, or harassment.

2. 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 has a strict **zero tolerance** policy for retaliation. 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.
- Any Associate who violates this Policy or participates in retaliation against an Associate or Person making a report in good faith may be subject to serious disciplinary action by the Company, up to and including termination of employment. First Solar reserves the right to take appropriate actions up to and including identifying an alternate source of supply or discontinuing purchases from a supplier should a supplier's efforts to comply with this policy be deficient.

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 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 continuous improvements and to remedy adverse impacts.