

Hanwha Solutions Corporation Code of Conduct

Hanwha Solutions Corporation (hereinafter the “Company”) is committed to conducting business in an ethical and honest manner, and in a way that promotes corporate social and environmental responsibility. This includes responsible supplier selection by conducting business with suppliers who share the Company’s commitment to integrity. We understand that the business practices and actions of a supplier may impact or reflect upon the Company. Therefore, the Company itself operates, and requires its suppliers, their employees, agents and sub-suppliers (“Suppliers”) to operate in accordance with the principles and ethical standards contained in this Code of Conduct (“Code”).

LABOR

The Company is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community.

The labor standards are:

- Freely Chosen Employment

Involuntary, bonded (including debt bondage) or indentured labor or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers’ freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment.

Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers’ or 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.

- Child Labor Avoidance and Compliance with Young Worker Safety

Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety. The Company and its Suppliers shall ensure proper management of student workers through protection of students’ rights in accordance with applicable law and regulations.

- Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local laws and regulations.

- Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from

wages as a disciplinary measure shall not be permitted. For each pay period, works shall be provided with a timely and understandable wage statement that includes sufficient information to verify its accuracy in compensation for the work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

- Humane Treatment

The Company's and Supplier's disciplinary policies and procedures shall be clearly defined and communicated to workers. There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, nor is there to be the threat of any such treatment. Disciplinary policies and procedures shall be clearly defined, documented, and communicated to workers.

- Non-Discrimination

The Company is committed to a workforce free of harassment and unlawful discrimination. The Company and its Suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

- Freedom of Association

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

HEALTH AND SAFETY

The Company recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. The Company also recognizes that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are:

- Occupational Safety

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Workers be encouraged to raise safety concerns and shall not be disciplined for raising safety concerns.

- Emergency Preparedness

Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans. Such plans shall include the focus of minimizing harm to life, the environment and property.

- Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and e) facilitate return of workers to work.

- Industrial Hygiene

Worker exposure to chemical, biological, and physical agents at dangerous levels is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

- Machine Safeguarding

Production and other machinery should be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

- Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Company, its Suppliers, or a labor agent are to be maintained clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, and adequate lighting, heat and ventilation and reasonable personal space along with reasonable entry and exit privileges.

- Health and Safety Communication

The Company and its Suppliers shall provide its workers with the appropriate workplace health and safety training in their language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire and physical hazards. Health and safety information shall be clearly posted in the work facility or placed in a location identifiable and accessible by workers, in accordance with applicable law. Workers shall be encouraged to raise safety concerns and not fear or experience any retaliation or reprisal for so doing.

ENVIRONMENTAL

The Company recognizes that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

The environmental standards are:

- Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

- Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source to the extent feasible by practices such as adding pollution control equipment, modifying

production, maintenance, and facility processes, or by other means. The use of natural resources including water, fossil fuels, minerals, and virgin forest products is to be conserved or minimized to the extent feasible by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or by other means.

- Hazardous Substances

Chemical and other materials posing a hazard if released to the environment are to be identified and managed in accordance with applicable law to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

- Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. The Company and its Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

- Water Management

The Company shall maintain a water management program that documents, characterizes, and monitors water sources, use and discharge, seeks opportunities to conserve water, and controls channels of contamination, all in accordance with applicable law. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. The Company and its suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

- Energy Consumption and Greenhouse Gas Emissions

Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. The Company and its Suppliers will look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions. At a minimum, the Company shall comply with federal law, state law and local ordinance governing requirements and adherence to energy code provisions and requirements.

MANAGEMENT SYSTEM

The Company and its Suppliers shall ensure they have a management system that contemplates the content of this Code. The management system shall be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

- Company Commitment

Corporate social and environmental responsibility policy statements affirming the commitment to compliance and continual improvement, endorsed by executive management.

- Management Accountability and Responsibility

The Company and its Suppliers will clearly identify senior executive and company representative[s] responsible for ensuring compliance with this Code.

- Legal and Customer Requirements

Identification, monitoring and understanding of applicable laws, regulations, and customer requirements.

- Risk Assessment and Risk Management

A process to identify the environmental, health and safety¹ and labor practice and ethics risks associated with its operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

- Training

Programs for training managers and workers to implement the requirements of this Code.

- Communication

A process for communicating clear and accurate information about policies, practices, expectations and performance related to this Code to workers, suppliers, and customers.

- Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

- Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

ETHICS

To meet social responsibilities and to achieve success in the marketplace, The Company and its Suppliers are to uphold the highest standards of ethics including the principles outlined below.

- Business Integrity

The highest standards of integrity are to be expected in all business interactions. The Company has a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, and embezzlement. All business dealings should be transparently performed and accurately reflected on the its business books and records. Monitoring and enforcement procedures shall be implemented to ensure conformance with anti-corruption laws.

- No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

¹ Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.

- Disclosure of Information

Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

- Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer and supplier information is to be safeguarded.

- Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld.

- Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers² are to be maintained, unless prohibited by law. The Company should have a communicated process for their personnel and workers to be able to raise any concerns without fear of retaliation or reprisal.

- Responsible Sourcing of Minerals

The Company and its Suppliers shall work to reasonably assure that the tantalum, tin, tungsten, cobalt and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. The Company and its Suppliers will exercise due diligence on the source and chain of custody of these and other potential minerals mined or resourced in such conditions.

- Privacy

The Company commits to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. The Company will comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

² Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.