

## **Responsible Procurement Principles (RPP)**

At Nextracker, we strive to comply with internationally recognized principles on human rights, environmental management, business integrity, and anti-corruption. These are the core elements of our organizational operations and our entire supply chain. This RPP is instrumental to Nextracker's goal to drive sustainability within the solar industry and raise the bar in social, environmental, and ethical dimensions.

Nextracker expects all of its suppliers to implement appropriate and effective policies to ensure compliance with our RPP and all relevant laws and regulations. Our RPP is applicable to all suppliers who do business with Nextracker, especially those engaged in:

- Manufacturing products, packaging, parts, components, subassemblies, materials, or otherwise involved in processes related to any of the foregoing; and
- Providing services to, or on behalf of Nextracker, regardless of type, location, or duration.

Our goal is to achieve observable and measurable improvements in our supply chain. We expect our suppliers to implement these values into their operations, and we rely on everybody's commitment and support. All progress will be based on collaboration, transparency, and a hands-on attitude from all parties. We will provide proper guidance to our suppliers as we work to develop and achieve industry-leading sustainability. Our joint efforts to establish a more sustainable supply chain will offer ample opportunities to strengthen our business relations and create value for our respective companies.

We expect all suppliers to implement our RPP in a diligent and transparent manner. In particular, we require all suppliers to:

- Implement processes or leverage existing systems that enable suppliers to identify, avoid, or mitigate risks in their own operations and in their business relationships;
- Assess their operations and entire supply chain against Nextracker's RPP; and
- Communicate and actively engage with their workers, suppliers, and stakeholders so they can identify potential concerns.

Nextracker's RPP consists of five core compliance sections. Sections A, B, and C outline standards for labor, health and safety, and the environment, respectively. Section D adds standards relating to business ethics, and Section E outlines the elements of an acceptable system to manage conformity to the RPP. Additional expectations are mentioned under section E, point 13. Part F is reserved for the supplier's signature, and the last chapter, G, contains the references to recognized standards and other related materials.

### **A) LABOR**

Nextracker is committed to upholding the human rights of workers and to treat them with dignity and respect as recognized by the international community. This applies to direct and indirect suppliers, as well as all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. A supplier must comply with all applicable anti-slavery, human trafficking, and migration laws, which must be regularly enforced through the supplier's documented organizational policies throughout the term of the supplier's engagement with Nextracker. This must include implementing processes and procedures that identify, remediate, manage, prevent, and mitigate the risk of noncompliance with anti-slavery, human trafficking, and migration laws. The recognized standards, as set out in the References section herein, were used in preparing the RPP and may be useful sources of additional information. The following labor standards will apply to all suppliers.

### 1. Freely Chose Employment

Forced, bonded (including debt bondage), or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons is not permitted. Nextracker suppliers and their respective suppliers are forbidden from using these banned labor practices and must ensure that they do not source from, transport through, pre-process in, manufacture in, store in, or engage in any other production step in declared risk areas for labor and human rights violations. Banned labor practices include transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility and no unreasonable restrictions on entering or exiting company-provided facilities, including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in a language the worker can understand that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin, and there shall be no changes allowed in the employment agreement upon arrival in the receiving country unless these changes are made to comply with local laws and provide equal or better terms. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty. Employers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Notwithstanding the foregoing, Employers can only hold documentation if such holdings are required by local law. If strictly necessary to comply with local laws, Suppliers may maintain documentation on leaving workers; however, workers shall not be denied access to their documents. 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 immediately repaid to the worker.

### 2. Young Workers

Child labor is forbidden in any stage of manufacturing. The term, "child," refers to any person under the age of fifteen, or under the age for completing compulsory education or under the minimum age for employment in that respective country, whichever age is oldest. All suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of eighteen shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance and remediation shall be provided by the supplier.

### 3. Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Working hours shall not exceed the maximum set by local law. Furthermore, a work week should not be more than sixty hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off in every seven-day period.

### 4. 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. All workers shall receive equal pay for equal work and qualifications. 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, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch, and outsourced labor will be within the limits of applicable local laws.

### 5. Humane Treatment

There shall be no harsh or inhumane treatment including violence, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers, nor the threat of any such forbidden treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

### 6. Non-Discrimination and Non-Harassment

Suppliers should be committed to a workplace free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination or harassment 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 for wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. This policy requirement aligns with the ILO Discrimination (Employment and Occupation) Convention (No.111).

### 7. Freedom of association and Collective Bargaining

Workers or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of reprisal, discrimination, intimidation, harassment, or retaliation in any other form. In alignment with the foregoing principles, if there are no applicable laws requiring such, Suppliers shall apply these RPP terms. Suppliers shall respect the rights of all workers to form and join trade unions of their own choosing, to bargain collectively, to engage in peaceful assembly, as well as respecting the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulation, workers shall be allowed to elect and join alternative forms of worker representation groups.

## **B) HEALTH AND SAFETY**

NextTracker's supplier should have a third party-certified occupational health and safety management system in compliance with the requirements of ISO 45001. Suppliers shall maintain and provide current ISO 45001 certification records. If the supplier's manufacturing facility is not currently ISO 45001 certified, the supplier is required to obtain certification within two years of commitment.

Suppliers should recognize 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. Suppliers should also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace. Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health were used as references in developing this RPP and can be accessed in Section H herein. The following health and safety standards apply to all suppliers.

### 1. Occupational Health and Safety

The potential risks for workers' exposure to health and safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) must be identified, assessed, and mitigated using the NIOSH's Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained personal protective equipment ("PPE") and educational materials about risks associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions that could be hazardous to them or their child, and providing reasonable accommodations for nursing mothers.

## 2. Emergency Preparedness

Potential emergency situations and events must be identified and assessed, and their impact must be minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by applicable local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, pre-determined assembly points, clear and unobstructed egresses, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

## 3. Occupational Injury and Illness

Procedures and systems must be in place to prevent, manage, track, and report occupational injury and illness, including provisions to classify and record injury and illness cases, encourage worker reporting, provide necessary medical treatment, investigate cases, implement corrective actions to eliminate the causes of cases, and facilitate the return of workers to work. Suppliers shall allow workers to remove themselves from imminent harm, and permit them to not return until the situation is mitigated without fear of retaliation.

## 4. Industrial Hygiene

Worker exposure to chemical, biological, and physical agents must be identified, evaluated, and controlled according to the NIOSH's Hierarchy of Controls. If any potential hazards are identified, suppliers shall look for opportunities to eliminate or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards should be controlled through proper design, engineering, and administrative measures. When hazards cannot be adequately controlled by such means, workers should be provided with and use appropriate, well-maintained PPE free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards. Suppliers shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. Suppliers shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

## 5. Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material-handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks must be identified, evaluated, controlled, and if reasonably practicable, replaced with automation. We expect every supplier to have an ergonomic program in place to improve their employees' working conditions and minimize any negative impact on their health.

## 6. Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers must be provided and properly maintained where machinery presents an injury hazard.

## 7. Sanitation, Food, and Housing

Workers must be provided with reasonable access to clean toilet facilities, potable water, sanitary food preparation and storage, and eating facilities. Worker dormitories provided by the supplier or its labor agent shall include appropriate emergency egresses, hot water for bathing and showering, adequate lighting and conditioned ventilation, individually secured accommodations for storing personal items, and reasonable personal space along with reasonable entry and exit privileges. In addition, worker dormitories shall be adequately maintained to be clean and safe.

### 8. Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, especially mechanical, electrical, chemical, fire, and physical hazards. Health-and-safety-related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

### 9. Health and Safety Measures for Transmittable Viruses (e.g., COVID-19)

The COVID-19 pandemic affected and continues to affect businesses in a variety of ways. Whether COVID-19 or a different transmittable virus or airborne pathogen, solar companies face unique challenges due to the nature of their onsite work or in factories that may involve interactions with coworkers, customers, and suppliers. National and local governments have published information on expectations and requirements about providing workers with remote work opportunities, safety measures and guidelines in the workplace (such as social distancing), and the provision of proper PPE (e.g., facial masks, hand sanitizer, cleaning procedures for work surfaces, and other similar considerations). Suppliers shall comply with the requirements of their respective health authorities to protect workers and other onsite personnel, customers, suppliers, visitors, stakeholders, and others from the spread of transmittable viruses or pathogens.<sup>1</sup>

## C) ENVIRONMENT

Nextracker's supplier should have a third party-certified environmental management system in compliance with the requirements of ISO 14001. Suppliers shall maintain and provide current ISO 14001 written certification records. If the critical Supplier's manufacturing facility is not currently ISO 14001 certified, the supplier is required to obtain certification within two years of commitment.

Across all business functions, Suppliers should recognize that environmental responsibility is integral to producing world-class products. Suppliers shall identify their respective environmental impacts and minimize their adverse effects on the community and the environment (especially related to natural resources consumption) within their manufacturing operations while protecting the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco-Management and Audit Scheme (EMAS) were used as references (provided in Section H herein) in developing this RPP. The following environmental standards apply to all suppliers.

### 1. Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals, and registrations must be obtained and maintained as current. All suppliers must follow their respective operational and reporting requirements.

### 2. Pollution Prevention and Resource Conservation

Emissions and discharges of pollutants and generation of waste must be minimized or eliminated at the source or by practices such as adding pollution-control equipment, modifying processes (whether production, maintenance, or facility), or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products shall be conserved by practices such as modifying processes (whether production, maintenance, or facility), materials substitution, re-use, conservation, recycling, or other means.

### 3. Hazardous Substances

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<sup>1</sup> The U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) published "Guidance on Preparing Workplaces for COVID-19"<sup>10</sup> to help companies respond in the event of COVID-19 in the workplace. The guidance was developed in collaboration with the U.S. Department of Health & Human Services (HHS). The document provides practical guidance for preventing the spread of COVID-19 and contains information on safe work practices and appropriate PPE based on the risk level of exposure. The RBA has another guidance to address COVID-19 and labor and human rights, in reference to the WHO, which is accessible here: [http://www.responsiblebusiness.org/media/docs/RBA\\_COVID-19.pdf](http://www.responsiblebusiness.org/media/docs/RBA_COVID-19.pdf).

Chemicals, waste, and other materials posing a hazard to humans, or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or re-use, and disposal.

#### 4. Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid, non-hazardous waste. Waste data shall be tracked and documented.

#### 5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting substances, and combustion byproducts generated from operations must be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances shall be effectively managed in accordance with the Montreal Protocol (please refer to this RPP's Section H) and applicable regulations. Suppliers shall conduct routine monitoring of the performance of their air emission control systems.

#### 6. Materials Restrictions

Suppliers must comply with all applicable laws, regulations, and any additional Nextracker requirements regarding the prohibition or restriction of specific substances in products and manufacturing processes, including labeling for recycling and disposal. This is applicable for the entire product and the packaging. These restrictions can be specific to a material or where the material is derived from.

#### 7. Water Management

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, uses, and discharges. The water management program must emphasize conserving water as much as possible and also control channels of contamination. All wastewaters must be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

#### 8. Energy Consumption and Greenhouse Gas (GHG) Emissions

Suppliers shall establish and report against corporate-wide greenhouse gas reduction goals. Energy consumption and all relevant Scope 1, Scope 2, and Scope 3 GHG emissions shall be tracked, documented, and publicly reported against the GHG reduction goal. Suppliers should look for methods to improve energy efficiency and to minimize their energy consumption and GHG emissions. Per the EPA Center for Corporate Climate Leadership, Scope 1 emissions are direct GHG emissions that occur from sources that are controlled or owned by an organization (e.g., emissions associated with fuel combustion in boilers, furnaces, and company vehicles). Scope 2 emissions are indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling "products." Even though Scope 2 emissions physically occur at the facility where they are generated, they are accounted for in the purchasing organization's GHG inventory because they are a result of that organization's energy use. Scope 3 emissions are the result of activities from assets not owned or controlled by the reporting organization, but which that organization indirectly affects in its value chain.

It is important to note that established processes and procedures must exist within a supplier's operations, their subsidiary operations, and their Tier 1 supply chain to measure and report to Nextracker the GHG emissions, based on the [GHG Protocol Corporate Accounting and Reporting Standard](#).

## D) ETHICS

To meet social responsibilities and to achieve success in the marketplace, suppliers and their agents must uphold the highest standards of ethics, including:

### 1. Business Integrity

The highest standards of integrity must be upheld in all business interactions. If not already in existence, all suppliers shall immediately implement a zero-tolerance policy that prohibits all forms of bribery, fraud, corruption, extortion, and embezzlement.

### 2. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage shall not 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, in order to obtain or retain business, direct business to any person or business entity, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with all applicable anti-corruption laws.

### 3. Disclosure of Information

All business dealings should be transparently performed and accurately reflected on a supplier's business books and records. Information regarding a supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance must 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.

### 4. Intellectual Property

Intellectual property rights shall be respected. Transfer of technology and know-how must be done in a manner that rigidly protects intellectual property rights, and customer and supplier information must be always properly safeguarded with commercially reasonable standards of care.

### 5. Fair Business, Advertising, and Competition

Standards of fair business, advertising, and competition must be upheld.

### 6. Protection of Identity and Non-Retaliation

Provided that it is legally permissible, a supplier must have regularly maintained programs that ensure the confidentiality, anonymity, and protection of whistleblowers working for or on behalf of a supplier. Suppliers should communicate the process to their employees, contractors, or subcontractors for how to raise any concerns without fear of retaliation.

### 7. Responsible Sourcing of Minerals

Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold ("3TG"), and cobalt in the products they manufacture or distribute in any way to reasonably assure that they are sourced in a way consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The foregoing "Due Diligence Guidance" provides step-by-step management recommendations endorsed by governments for global responsible supply chains of all minerals, in order for companies to respect human rights and avoid contributing to conflict through their mineral or metal purchasing decisions and practices. Suppliers are encouraged to develop and enforce mineral-sourcing policies based on the OECD's system or an equivalent and recognized due-diligence framework. In addition to 3TG, suppliers shall apply this responsible-mineral-sourcing initiative to cover other minerals that can be considered "conflict minerals." If cobalt is involved in the process, a supplier shall connect to the Global Battery Alliance and Cobalt Action Partnership for proper guidance on cobalt disclosure and its processing. Suppliers and their agents shall make their due diligence measures available to Nextracker upon request.

### 8. Privacy

Suppliers must commit to reasonable privacy policies protecting the personal information of everyone they do business with or collect personally identifying information ("PII") from. This privacy policy covers suppliers, customers, agents, contractors or subcontractors, other stakeholders, employees, and citizens from any country who provide PII to suppliers in myriad ways (e.g., visiting a supplier's website). Suppliers must comply with all applicable privacy and information security laws and regulatory requirements when PII is collected, stored, processed, transmitted, and shared.

## **E) MANAGEMENT SYSTEMS**

Every supplier shall adopt or establish a management system with a scope that is related to the content of this RPP. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations, and customer requirements related to that supplier's operations and products; (b) compliance with this RPP; and (c) identification and mitigation of operational risks related to this RPP. It should also facilitate continuous improvement. The management system should contain the following elements:

### 1. Company Commitment

Every supplier should have human rights, health and safety, environmental, and ethics policy statements affirming the supplier's commitment to due diligence and continuous improvement, endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.

### 2. Management Accountability and Responsibility

The supplier should clearly identify senior executive and company representatives responsible for ensuring implementation of the management systems and associated programs. Senior management of the supplier should review the status of the management systems on a regular basis.

### 3. Legal and Customer Requirements

Every supplier should have a process to identify, monitor, and understand applicable laws, regulations, and customer requirements, including the requirements of this RPP.



#### 4. Risk Assessment and Risk Management

Every supplier shall adopt or establish a process to identify the risks associated with the supplier's operations regarding legal compliance, environmental impacts, health and safety practices, labor and human rights practices, and ethics. Suppliers shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

#### 5. Improvement Objectives

Each supplier should have written performance objectives, targets, and implementation plans to improve the supplier's social, environmental, and health and safety performance, including a periodic assessment of the supplier's performance in achieving those objectives.

#### 6. Training

It is vital that each supplier shall establish programs for training managers and workers to implement the supplier's policies, procedures, and improvement objectives to satisfy applicable legal and regulatory requirements.

#### 7. Communication

All suppliers shall develop robust processes for communicating clear and accurate information about supplier policies, practices, expectations, and performance to workers, suppliers, and customers.

#### 8. Worker/Stakeholder Engagement and Access To Remedy

Every supplier shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall be structured to obtain feedback on operational practices and conditions covered by this RPP, and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

#### 9. Audits and Assessments

Every supplier must conduct periodic self-evaluations to comply with (i) legal and regulatory requirements, (ii) the content of this RPP, and (iii) customer contractual requirements related to social and environmental responsibility. For the environmental health and safety self-evaluations, suppliers must perform risk assessments covering production areas, warehouse and storage facilities, facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchens and cafeterias, and worker housing and dormitories.

#### 10. Corrective Action Process

It is mandatory for every supplier to have a process for prompt correction of noncompliance identified by internal or external assessments, inspections, investigations, and reviews.

#### 11. Documentation and Records

All suppliers must create and maintain documents and records to ensure regulatory compliance and conformity to Nextracker's requirements, which must be done with appropriate confidentiality to protect privacy.

### 12. Supplier Responsibility

Every supplier shall communicate these RPP requirements to their respective direct suppliers and take reasonable steps to monitor and require their directly contracted suppliers' RPP compliance to the extent reasonably practical.

### 13. Product Traceability

When required for certain regulatory matters, particularly when Nextracker is required to provide information to Nextracker customers or government authorities pursuant to compliance with laws and applicable regulations, to the extent reasonably practical and for which a supplier has reasonable abilities to comply with the following: each supplier shall make reasonable, good-faith efforts to ensure that they have an adequate system to trace a product throughout their supply chain until that product reaches the supplier. Each movement of the product and its components or material inputs through each stage of the production, processing, and distribution should be documented, with this documentation accessible to the supplier and to Nextracker, when reasonably requested, at any point in time within that supplier's supply chain. Product traceability within this RPP refers to social and environmental factors and is formulated in reference to the [SEIA Supply Chain Traceability Protocol](#). Nextracker requests every supplier to have full supply-chain-transparency systems in place, regardless of their location or the final product destination. When reasonably requested by Nextracker, suppliers must provide full disclosure of their supply chain with respect to this RPP requirement on a regular basis and when any change in their supply chain occurs.

## F) SIGNATURE

A signature is required from Supplier's general manager or from Supplier's representative in a senior position.

Supplier Name	
Supplier Address (line 1)	
Supplier Address (line 2)	
Supplier Address (line 3)	
Authorized Supplier Signatory Name (print)	
Authorized Supplier Signatory Title (print)	
Authorized Supplier Signatory's Signature	
Date of Supplier's Signature (MM/DD/YYYY)	

## G) REFERENCES

The following standards were used in developing this RPP and may be useful sources of additional information. The following standards may or may not be endorsed by Nextracker in part or in full.

Dodd-Frank Wall Street Reform and Consumer Protection Act  
<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>

Eco Management & Audit System  
[http://ec.europa.eu/environment/emas/index\\_en.htm](http://ec.europa.eu/environment/emas/index_en.htm)

Ethical Trading Initiative  
[www.ethicaltrade.org](http://www.ethicaltrade.org)

ILO Code of Practice in Safety and Health

[www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf](http://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf)

ILO Fundamental Conventions

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87)
- Right to Organise and Collective Bargaining Convention, 1949 (No.98)
- Forced Labour Convention, 1930 (No.29)
- Abolition of Forced Labour Convention, 1957 (No.105)
- Minimum Age Convention, 1973 (No.138)
- Worst Forms of Child Labour Convention, 1999 (No.182)
- Equal Remuneration Convention, 1999 (No.100)
- Discrimination (Employment and Occupation) Convention, 1958 (No.111)
- Occupational Safety and Health Convention, 1981 (No.155), and the Promotional Framework, 2006 (No.187)

ILO International Labor Standards

[www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm](http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm)

ISO 14001

<https://www.iso.org/standard/60857.html>

Montreal Protocol

<https://www.state.gov/key-topics-office-of-environmental-quality-and-transboundary-issues/the-montreal-protocol-on-substances-that-deplete-the-ozone-layer/>

National Fire Protection Association

<https://www.nfpa.org>

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

<http://www.oecd.org/corporate/mne/mining.htm>

OECD Guidelines for Multinational Enterprises

<http://www.oecd.org/investment/mne/1903291.pdf>

ISO 45001

<https://www.iso.org/standard/63787.html>

The National Institute for Occupational Safety and Health (NIOSH) Hierarchy of Controls

<https://www.cdc.gov/niosh/topics/hierarchy/default.html>

RBA 8.0 Code of Conduct

<https://www.responsiblebusiness.org/code-of-conduct/>

Responsible Business Conduct During the COVID-19 Crisis

[http://www.responsiblebusiness.org/media/docs/RBA\\_COVID-19.pdf](http://www.responsiblebusiness.org/media/docs/RBA_COVID-19.pdf)

Solar Industry Commitment to Environmental and Social Responsibility: Participant Handbook

[https://seia.org/sites/default/files/The%20Solar%20Commitment-%20Participant%20Handbook%20\\_2014.pdf](https://seia.org/sites/default/files/The%20Solar%20Commitment-%20Participant%20Handbook%20_2014.pdf)

Universal Declaration of Human Rights

<https://www.un.org/en/universal-declaration-human-rights>

United National Convention Against Corruption

<https://www.unodc.org/unodc/en/treaties/CAC>

United Nations Convention on the Rights of the Child

<https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

United Nations Convention on the Elimination of All Forms of Discrimination Against Women

<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx>

Ten Principles of the United Nation Global Compact

<https://www.unglobalcompact.org/what-is-gc/mission/principles>