



Transparency in Supply Chains and Modern Slavery Statement

First Solar, Inc. and its subsidiaries and affiliates (collectively “First Solar”) is committed to respecting and protecting human rights across our business operations and supply chain. As part of this commitment, we stand against all forms of modern slavery and have zero tolerance for forced labor, human trafficking and child labor.

This statement for the financial year ending 31 December 2021 has been published in accordance with the California Transparency in Supply Chains Act of 2010 (SB 657) and the UK Modern Slavery Act 2015, which require certain businesses to disclose information relating to their efforts to address the risks of modern slavery in their operations and supply chains. This statement refers to First Solar, Inc. and its subsidiaries collectively, including our European subsidiaries: First Solar Holdings GmbH (Germany), First Solar Manufacturing GmbH (Germany), and First Solar GmbH (Germany). A complete list of First Solar’s global subsidiaries can be found in Exhibit 21.1 of [First Solar’s Form 10-K](#), filed with the US Securities and Exchange Commission on 1 March 2022.

Our Business and Supply Chain

First Solar is a leading American solar technology company and global provider of responsibly-produced eco-efficient solar modules advancing the fight against climate change. Developed at R&D labs in California and Ohio, we manufacture and sell solar photovoltaic (PV) modules with an advanced thin film semiconductor technology that provide a high-performance, lower-carbon alternative to conventional crystalline silicon PV solar modules. From raw material sourcing and manufacturing through end-of-life module recycling, our approach to technology embodies sustainability and a responsibility towards people and the planet. We are the world’s largest thin film PV solar module manufacturer and the largest PV solar module manufacturer in the Western Hemisphere.

As of 31 December 2021, we had approximately 4,800 associates (our term for full and part-time employees). First Solar is headquartered in Tempe, Arizona, with regional offices around the world and manufacturing facilities in Perrysburg and Lake Township, Ohio; Kulim, Malaysia; and Ho Chi Minh City, Vietnam. We own and operate the facilities which manufacture our modules- turning a sheet of glass into a completed module, under one roof.

Our thin film module manufacturing process uses approximately 30 types of raw materials and components to produce a solar module. Critical raw materials and components in our manufacturing process include cadmium telluride, front glass coated with transparent conductive oxide, organics such as photo resist, tempered back glass, frames, packaging components such as interlayer, cord plate/cord plate cap, cables and solar connectors. For more information on our supply chain, please refer to our [2021 sustainability report](#).

Our Commitment and Policies

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.

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:

- [First Solar Code of Conduct](#): *Relentless Integrity: How We Conduct Business Ethically* (“our Code”) is an important resource designed to help us meet our business goals ethically. Our Code provides a firm foundation for the decisions we make and actions we take when conducting business and applies to everyone at First Solar, including all associates, officers, and directors.
- [First Solar Labor and Human Rights Policy](#): Our Labor and Human Rights policy outlines First Solar’s commitment to respecting fundamental human rights and protecting the dignity of workers everywhere. Our policy is aligned with the Responsible Business Alliance’s (RBA) Code of Conduct and guided by the International Labour Organization 1998 Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights.
- [First Solar Conflict Minerals Policy](#): First Solar is committed to responsible sourcing and operating a supply chain free of conflict minerals. We comply with and support the goals established under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) on conflict minerals and condemn human rights abuses associated with the extraction, transport or trade of minerals and any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points or any upstream actors in the supply chain.
- [RBA Code of Conduct](#) (“RBA Code”): The RBA Code is a set of social, environmental and ethical industry standards. The provisions in the RBA Code are derived from internationally recognized standards including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights. As a member of the RBA, we implement the RBA Code within our operations and our supply chain.

Risk Assessment and Due Diligence

From our policy, supplier contracts, screening, mapping and auditing, to training and reporting, First Solar takes a comprehensive approach to responsible sourcing and supply chain management in order to identify, prevent and mitigate potential adverse human rights and environmental impacts:

1. **Verification:** All new suppliers undergo a rigorous qualification process using a balanced scorecard which focuses on Quality, Cost, Flexibility, Service, Technology and Sustainability. We regularly map our supply base and conduct an annual risk assessment to identify potential high-risk suppliers. In 2021, we leveraged third-party tools and indexes on global slavery, forced labor and other

environmental, social, governance (ESG) aspects to identify high-risk suppliers based on industry, geography and spend.

2. **Audits:** First Solar audits new and high risk suppliers on quality as well as environmental management, health and safety, labor, human rights, and ethics by leveraging the RBA Code as a framework. In 2021, First Solar became a member of the RBA which gives us access to their advanced due diligence tools and programs, and will enable us to conduct third-party audits of potential high-risk suppliers by leveraging their Validated Assessment Program (VAP) – a leading standard for onsite compliance verification and effective, shareable audits. We work with suppliers to drive improvements and to remedy adverse impacts through Corrective Action Plans. We publicly report on the environmental and social performance of the suppliers we audit in our sustainability report on an annual basis. In 2021, First Solar conducted six audits which included environmental and social criteria based on the RBA code and one supplier completed a third-party VAP audit. Due to Covid-19 travel restrictions in 2021, most of the audits were conducted virtually.
3. **Certification:** First Solar’s supplier agreements require compliance with applicable laws and regulations in addition to First Solar requirements, which may exceed local legal requirements. Under the terms of First Solar’s supplier agreements, suppliers must commit to comply with the RBA Code 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. Violation of any labor standards may result in the termination of First Solar’s business relationship with such party.
4. **Internal Accountability:** First Solar requires all of its directors, officers and associates to act ethically and requires compliance with First Solar’s Associate Handbook and our Code. Our Chief Compliance Officer manages First Solar’s Global Compliance Organization which oversees our ethics and compliance program. The goal of this organization is to implement policies, processes, training, monitoring and general awareness programs to promote ethics and compliance with applicable legal and regulatory standards. Subject to the requirements of local law, and after due diligence and full and fair investigation, any employee found to have directly engaged in or knowingly engaged suppliers engaged in slave labor or human trafficking will be subject to immediate termination of employment.
5. **Training:** In 2021, we provided Transparency across Supply Chain training to all First Solar associates involved in procurement and achieved a 100% completion rate. The training includes the following objectives: recognizing and communicating awareness of human trafficking risks relevant to First Solar’s business; ensuring compliance with the California Transparency in Supply Chains Act (SB 657) and global human rights regulations; and identifying and avoiding trafficked labor in each specific business unit at First Solar.
6. **Ethics Hotline:** 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. No human rights concerns were reported in 2021. The Ethics Hotline ensures that serious concerns are heard and are acted upon immediately. Any associate, employee of First Solar, supplier and other external stakeholder can report concerns toll-free via our [Ethics Hotline](#).



First Solar has a long-standing commitment to conducting business in compliance with applicable laws and regulations and in accordance with the highest ethical principles. We will continue to work with our suppliers to ensure they conduct their business in line with First Solar values.

This statement was approved by the Board of Directors of First Solar on 21 April 2022 and signed by Mark R. Widmar, Chief Executive Officer and Director.