



## SOLV Energy – Supply Chain Responsibility

### Our Management Approach

#### **Overview and Intent**

Consistent with our [Code of Conduct](#) (“Code”) and our [Impact & ESG Policy](#), SOLV Energy (“SOLV”) commits to the goal of a supply-chain free of “Forced Labor” practices. As stated in our Code:

- No party shall procure, manufacture, or subcontract for any service, product, or material for which forced or indentured labor, child labor, or other exploitation is used in its production.
- “Forced Labor” shall mean all work (including services, products, or materials) which is exacted from any person by force or indentured labor or other exploitation, including child labor, under the threat of a penalty and in which such person has not offered themselves voluntarily (also known as modern slavery, indentured servitude, or human trafficking).
- All parties must ensure that they and their sub-tier service providers, subcontractors, suppliers, and vendors, throughout the supply-chain, do not directly or indirectly use Forced Labor for any service or in the procurement or manufacture of any product or material, which is imported into the United States.
- SOLV expects cooperation in the implementation and execution of reasonable due diligence procedures for itself and its service providers, subcontractors, suppliers, vendors, and other participants with respect to their supply-chains.

The approach described below supplements the full language detailed in the Code.

#### **Management Approach**

SOLV is committed to the following activities in support of our goal of a supply-chain free of “Forced Labor” practices:

- 1) Making reasonable efforts to ensure our first-tier suppliers are in alignment with SOLV’s Code of Conduct, with an emphasis on high-priority sectors involved in the manufacture and distribution of products that are being imported into the United States;
- 2) Maintaining and managing a supplier prequalification process which includes evaluating supplier practices around “Forced Labor”;
- 3) When evaluating new vendors or suppliers, research and verify that the company is:
  - a. Not providing materials listed by the Bureau of International Labor Affairs (ILAB) [List of Goods Produced by Child Labor or Forced Labor](#). If a product or good is listed, this will trigger additional review.
  - b. Not listed on the Department of Homeland Security’s Forced Labor Enforcement Task Force (FLETF) [UFLPA Entity List](#).



- 4) For first-tier suppliers, collect information and documentation on supply chain responsibility practices, focusing on high-priority sectors, through the SOLV Energy Supplier and Partner Impact questionnaire and other information requests:
  - a. Collected on a 2–3-year cycle for all first-tier material suppliers,
  - b. Collected at time of supplier evaluation for new major material suppliers,
  - c. Supplemental information requests submitted and reviewed as needed.
- 5) Confirm each vendor and supplier is on a specific client’s Approved Vendor List (AVL), where applicable. If a recommended vendor is not on the AVL, SOLV energy will engage with the client to present qualifications and jointly determine compliance.

### **Scope and Administration**

In recognition of the recommendations suggested within SEIA’s (Solar Energy Industries Association) Solar and Energy Storage Supply Chain Traceability Standards, SOLV is committed to being reasonably transparent in its decisions and activities associated in the sourcing of products procured under its operations. SOLV focuses primarily on high-priority sectors, as described within UFLPA Section 2(d)(2)(B) where SOLV has material control over the technology design selection, procurement, transportation, and installation of products and services.

These efforts are administered primarily through our Procurement department, with support from members of our Compliance, Finance, and Legal teams, along with the Impact & ESG Committee.

SOLV will periodically review and evaluate our approach and will revise or adjust as necessary. Improvements may include changes to targets and objectives, suppliers, evolution of resources, or the deployment of new practices, processes and/or programs.

### **Record Keeping**

SOLV will maintain information, assessment results, transactional details (e.g. purchase order(s), proof of payment, delivery records), and other relevant records related to supply chain management in accordance with our Records Retention Policy.

### **Feedback, Corrective Action, and Disclosure**

SOLV regularly engages with clients, industry leaders, vendors, suppliers, and other stakeholders as part of its Impact & ESG initiatives. Input will be solicited on the approach detailed here and on individual companies within the supply chain.

In case of discovery of non-compliance or material risks, SOLV reserves the right to address any potentially adverse impact by taking proportionate actions necessary, which may include termination, cancellation or amendment of contracts. SOLV may disclose the specifics of non-compliance to appropriate stakeholders, and work to resolve our concerns, find suitable alternatives, and/or initiate other remedies as necessary.



### **Communication and Training**

This document is posted on SOLV Energy’s website, on internal company resource pages, and highlighted in select company meetings and communications. Employees tasked with the management and implementation are given training and guidance by members of the Procurement team or other resources as appropriate.