



2022

TRANSPARENCY ACT
STATEMENT

RECSiLICON

OUR STRUCTURE, OPERATIONS AND HUMAN RIGHTS MANAGEMENT SYSTEMS

REC Silicon ASA (“the Company” or “the Group”) is a global leader in silane-based, high-purity silicon materials, delivering high-purity silicon and silicon gases to the solar and electronics industries.

REC Silicon operates manufacturing facilities in Moses Lake, Washington and Butte, Montana in the USA. The Company’s sales and marketing activities for sales of solar grade polysilicon, semiconductor grade silicon and silicon gases are carried out in China, Japan, Korea, Taiwan, and in the United States. The Group also has an investment in the Yulin JV in China.

REC Silicon commits to internationally recognized human and labor rights standards, including:

- The International Bill of Human Rights
- The UN Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises
- The ILO Declaration on Fundamental Principles and Rights at Work
- The US National Labor Relations Act (NLRA)

The standards are further integrated into other fundamental documents of the Company’s internal regulatory system, and REC Silicon strives to provide a working environment that is:

- Free from any form of discrimination, abuse, harassment or intimidation
- Free from discrimination based on gender, race, ethnical background, sexual orientation, age, political beliefs, marital status, or any other status
- Free from all forms of child labor, human trafficking, modern slavery and compulsory or forced labor
- Respective of the freedom of association and collective bargaining, as defined by the NLRA

- Respective of employees’ rights to freedom of opinion and expression, freedom of thought, conscience, and religion
- Offering fair working conditions in accordance with all applicable legislation to the employees
- Offering training to ensure that the employees conduct business ethically, honestly and in compliance with all applicable laws and regulations

REC Silicon requires its suppliers and business partners to share the same commitment.

This statement has been prepared in accordance with section 5 of the Transparency Act and summarizes the approach taken by REC Silicon to conduct due diligence on human rights and decent working conditions (together referred to as “human rights”) within its own operations and supply chain, in accordance with section 4 of the Transparency Act and in line with the OECD Guidelines for Multinational Enterprises.

We are committed to actively managing and monitoring our human rights impacts in accordance with the human rights due diligence expectations laid out in the Norwegian Transparency Act. We seek to continually improve human rights performance across all our operations and business relationships.

We remain focused on respecting human rights across all our operations, with an emphasis on facilitating active stakeholder dialogue and operating in accordance with all applicable regulatory frameworks, including the Norwegian Transparency Act.

REC SILICON'S HUMAN RIGHTS DUE DILIGENCE

REC Silicon's commitment to human rights is anchored in Section 4, "Our approach to human rights", in our Code of Conduct and Sustainability Policy, available on <https://recsilicon.com>. This policy is available online and is distributed across the organization. It was last approved by the board of directors of the Company on 15 November 2022.

The Company's explicit commitment to respect human rights extends to all employees, third-party personnel and suppliers. To ensure that our employees understand our commitment and their responsibility, we provide training on relevant human rights topics for our employees.

REC Silicon's human rights expectations extend to our suppliers, as stated in our Code of Conduct and Sustainability Policy. As an extension, the Company also require suppliers and business partners to share our commitments with regards to health & safety, which we regard as a fundamental part of human rights, and in particular labor rights. The Company monitors its suppliers' safety records annually to ensure that safe work practices are strictly adhered to and that all measures to ensure a safe and healthy work environment for employees are taken. Suppliers shall be able to provide records upon the request of REC Silicon.

REC Silicon will conduct regular supply chain audits on business conduct matters and on human rights to ensure compliance with the standards embedded in our Code of Conduct and Sustainability Policy.

In the coming year, the Company will establish a specific Supplier Code of Conduct which will formalize our principles when it comes to health and safety and human and labor rights. Suppliers will be required to sign this document and REC Silicon will conduct regular audits to ensure compliance with the obligations of suppliers.

REC Silicon also plans to set up a more formalized human rights risk assessment process, as well as a supply chain due diligence system. The human rights risk assessment will provide input to the prioritization of supply chain due diligence with targeted efforts to rectify any breaches of our principles.

REC Silicon is committed to continuing to improve its practices. Therefore, we look to further refine and act on our priority human rights issues related to our operations and specific industry. Furthermore, the Company seeks to continue to improve our stakeholder engagement on our priority human rights issues to ensure all relevant voices are included in our due diligence processes. While a whistleblower system is deployed for our own workforce, we see a clear need to establish a complaints procedure that ensures adequate engagement with workers in our supply chain so that any incidents are reported to REC Silicon promptly and without interference.

To continue improving our practices in the coming year, we will:

- Develop a Supplier Code of Conduct;
- Continue to communicate our human rights policy internally and externally, including to business partners;
- Continue mapping our supply chain and our business partners to better understand the human rights impacts within them; and
- Continue to anchor human rights due diligence within our operations.

REQUESTS FOR INFORMATION

Requests for information regarding this Transparency Act statement or REC Silicon's human rights due diligence policies and practices in general can be made to ir@recsilicon.com

This statement covers the period 1 July 2022 – 31 December 2022.

Lysaker, May 10, 2023
Board of Directors

This document is signed electronically.

Tae Won Jun
Chairman of the Board

Dong Kwan Kim
Deputy Chair

Dr. Renate Oberhoffer-Fritz
Member of the Board

Paraskevi (Vivian) Bertseka
Member of the Board

Roberta Benedetti
Member of the Board

Kurt Levens
President and CEO

RECSiLICON

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About REC Silicon

REC Silicon ASA is a leading producer of advanced silicon materials, supplying high-purity polysilicon and silicon gases to the solar and electronics industries worldwide. We combine over 30 years experience and best-in-class proprietary technology to deliver on customer expectations. Our two U.S. based plants have a capacity of more than 20,000 MT high-purity polysilicon. REC Silicon is headquartered in Lysaker, Norway and listed on the Oslo stock exchange under the ticker: RECSI.

For more information, go to: www.recsilicon.com