



CSR policy for Midsummer AB

2021-07-23

Introduction

Midsummer AB (“Midsummer”) operates in a world that expects companies to be aware of their impact on society based on environmental, economic, and social factors. This policy concerns Midsummer’s work in Corporate Social Responsibility (“CSR policy”).

CSR is a concept underpinned by the idea that a company should take into consideration the development of society by considering the effect of its activities on customers, suppliers, employees, and shareholders, as well as society and the environment. Midsummer’s CSR policy provides a description of Midsummer’s targeted approach to such factors. Midsummer’s CSR policy is supported by other internal policies.

Values and business principles

Midsummer’s activities shall be conducted in accordance with the company’s vision, values, and guidelines for sustainable development. In addition to all financial requirements, goals and guidelines of the company, business activities shall be conducted with high standards of integrity and ethics.

Midsummer and its employees shall observe the following guidelines:

- Midsummer shall comply with the laws and regulations that apply in the countries where the company operates as well as with the CSR policy.
- Midsummer respects the UN Declaration of Human Rights (www.un.org) and ILO core conventions (International Labor Organization) and accepts its responsibility to respect the rights of employees and society to the extent that they are affected by its operations.
- Midsummer has an open attitude in dialogue with those affected by its operations. Midsummer responds to requests from outsiders and communicates with relevant parties in a timely and efficient manner.

In areas where Midsummer has an influence, the company shall strive to ensure that suppliers and subcontractors comply with the relevant principles contained in this CSR policy.

All employees within Midsummer are responsible for ensuring that they, as well as the operation within which they work, act in accordance with these values and business principles. It is each employee’s responsibility to ensure that they have sufficient information about relevant laws, regulations and policies relating to all business, personnel, and investment decisions.



The management is responsible for ensuring this CSR policy is implemented and complied with in the operations.

It is the responsibility of each senior executive to report all possible cases of fraud or other criminal behavior to a member of the management.

Confirmed breaches of Midsummer's CSR policy will lead to immediate disciplinary action, including, after consultation with labor legislation, dismissal in cases of more serious departure from the guidelines.

Employees

Midsummer strives to be a respected employer – both for current and potential employees.

Midsummer shall provide a good working environment from a physical and social perspective.

Midsummer shall also strive to be an attractive employer regarding the professional and personal development of its employees.

This policy does not focus on commercial issues relating to each company's human resources function but provides rules of a character representing the minimum requirements. The relationship with and between employees shall be based on mutual respect and dignity, as well as a reasonable degree of influence in areas that affect the individual's work situation, such as workload, tasks, and information exchange.

- The conditions of employment, including pay and working hours, offered to the employees and the company's subcontractors shall meet at the least the minimum requirements of national legislation or industry standards.
- Midsummer does not accept forced labor, bonded labor, or other forms of involuntary labor at its workplaces.
- Midsummer does not employ any person below 15 years of age and, where local legislation stipulates a higher age limit, no persons under this age limit are recruited.
- Midsummer AB treats all employees equally irrespective of race, sex, age, nationality, religion, ethnic origin, or other distinguishing characteristics.
- Midsummer does not allow discrimination or harassment of any kind.
- Midsummer recognizes the right of employees to join trade unions
- The working environment offered by Midsummer shall be safe and healthy.



- We have safety and use instructions for every station in the manufacturing processes. During installation, we have established safety measures for our workers to prevent any workplace incidents.
- Midsummer offers a great working environment that emphasizes high appraisals towards employees but also, we give room for improvement for our employees in terms of staff training or personal development
- Midsummer offers standard benefits that enhance the life quality in terms of health care, parental leave, and retirement provision
- We believe that employees have the right to associate freely in the working environment and by open discussions together with the workers and the management team, we enable improvements and solve issues that occurs.

It is desirable to enhance the communication and well-being between and for every employee and we emphasize the time to plan for internal teambuilding activities and any form of activities to improve the workforce chemistry. We also provide foods such as fruits and healthy snacks for free to promote healthier diet while also providing exercise benefits during working hours.

Market, customers and suppliers

Midsummer's operations are based on close and long-term relationships with customers and other business partners. Midsummer shall be perceived as a credible, long-term and reliable partner and shall act professionally, honestly and in an ethically sound manner. Midsummer does not accept corruption, bribery and unfair anti-competitive practices. All sales and marketing of Midsummer products and services shall be in accordance with relevant laws and regulations in each country.

- Midsummer shall not act in contravention of the applicable competition legislation in each country. Midsummer is not involved in cartels or other forms of unauthorized collaboration with competitors, customers or suppliers that restrict or distort competition.
- Midsummer shall not – either directly or indirectly – request or accept any form of improper payment or other remuneration for the purpose of inducing the company to act contrary to Midsummer's prescribed obligations. In order to avoid conflicts of interest, employees within Midsummer shall only give or accept gifts or services that are in line with common business practices, do not contravene relevant laws, do not have any significant economic value and cannot reasonably be regarded as bribery.
- Midsummer respects other companies' assets and protects Midsummer's tangible and intangible assets from loss, theft, infringement or misuse.



Suppliers/partners

In areas where Midsummer has an influence, the company shall strive to ensure that suppliers and subcontractors comply with the relevant principles contained in Midsummer's CSR policy and, for example, offer their employees a safe and healthy working environment.

Midsummer does not buy products from suppliers who, when requested to do so, cannot submit a written declaration saying that child labor is not permitted in their production.

Midsummer shall maintain appropriate processes for evaluating and selecting priority suppliers and partners. This evaluation process also takes into account the capacity to meet the requirements contained in this CSR policy. A follow-up of larger suppliers' ethical, social and environmental commitments shall be done annually, and immediate action taken in cases where any guideline contained in Midsummer's CSR policy has been breached.

In accordance with Midsummer's aim for transparency and trust, the company reserves the right, pursuant to agreement with suppliers, to conduct independent audits of suppliers' operations and physical facilities with the help of its own employees and/or external partners.

The results of completed follow-up audits are discussed with each supplier in order to assist them with any improvements to their work and reported annually to Midsummer management.

Environment

Midsummer's impacts on the environment and the preventive measures it takes to reduce its impact on the environment are important issues.

Midsummer's "Environmental policy" expresses an ambition to take its share of responsibility for reducing its impact on the environment and to contribute to sustainable development.

Midsummer shall encourage the development and distribution of environmentally friendly technology.

Environmental measures shall be taken as far as it is technically feasible, economically reasonable and environmentally justified to do so (See also: Midsummer's "Environmental policy".)

Sustainable Development Goals

Midsummer stand for and works towards achieving the targets of the UN's Sustainable Development Goals of today and tomorrow. To ensure this, currently several specific policies are implemented in every area of our business segment to be transparent and collective towards the rights of our internal employees and external partners. The inspiration from the UN's Sustainable Development Goals are to contribute and inspire to our closest society and to create a blueprint for several other industries to follow the same path to create a better world. We strive to follow the Sustainable Development Goals for us to include this into our CSR policy.



Social commitment

Midsummer shall strive to establish good relationships in the local communities where they operate. Business decisions likely to affect the community as a whole must, as far as possible, be preceded by, or as soon as possible be followed by, discussions with community representatives to identify any need for joint action. Any of our operations that would create harm or in any possibilities inflict our local community would be considered and actions will be made to reduce the impact.

Midsummer stands as an example of strengths and quality of governance by partnering up with committees such as Svensk Solenergi and European Solar Manufacturing Council. Midsummer shall be politically independent and not make any direct financial contributions to political parties or candidates.

Whistleblower

All employees of Midsummer have the right and the responsibility to report violations of the CSR policy and concerns that may threaten Midsummer's operations, finances or reputation, or actions that could be considered to be unethical or illegal in relation to Midsummer's stakeholders in areas such as, but not limited to; people and labor standards, discrimination and racism, environmental issues, financial integrity, accounting offences, conflicts of interest, fraud, bribery and corruption and fair dealing. Suppliers and customers to Midsummer and external parties are encouraged to report concerns. The person reporting decides what information is to be reported. To ensure adequate follow-up actions, the report should include as much detail as possible, and if possible, supporting evidence.

Concerns are to be reported to Midsummer Chairman of the Board, Jan Lombach,

The identity of the person reporting shall be protected during and after the initial evaluation and possible investigation. All investigations will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate review of the investigation or otherwise as required by law.



The principle for handling reports is that all reports are taken seriously with an adequate follow-up and timely feedback and information about the process to the person reporting.

The Chairman of the Board is responsible for confidentiality and information security and that an adequate follow-up is made in a timely manner.

Reporters, who notify in good faith, will not face any risk of retaliation or other unfavorable treatment, even if it is later discovered that they were mistaken.

However, appropriate disciplinary or legal action will be taken against any person who is found to have made a disclosure maliciously, which they know to be untrue, or without reasonable grounds for believing that the information supplied was accurate.

Measurement

It is impractical to have a set number of goals that Midsummer would like to reach in a certain future, but we see it as vital to be able to monitor and assess continuously how we reach the set targets. We are continuously collecting environmental data through conducting lifecycle assessments to analyze any improvements we could do to reduce the overall environmental impacts. We will further collect data that regards social aspects such as leave days, conducting interviews and surveys with our suppliers to get a greater understanding of the current situation and to develop strategies for the future.

Adaption and compliance

Midsummer's CSR policy is adapted by the Board of Midsummer AB once a year. The date and version of the policy is shown on the first page of the document. The latest updated version/edition of the policy shall be always available on Midsummer's intranet along with relevant links to principles and guidelines adopted by the company from the UN, the ILO and other organizations concerned with CSR. All employees within the company are responsible for keeping themselves updated regarding the latest revised edition of the policy. This CSR policy shall be included in the induction training for all new employees within the company.

Links to

ILO, <https://www.ilo.org/global/standards/lang--en/index.htm>

UN, <http://www.un.org/en/universal-declaration-human-rights/>