

**ACME SOLAR HOLDINGS LIMITED**  
**SUSTAINABLE PROCUREMENT POLICY**

**1. Introduction**

ACME Solar Holdings Limited (“ACME” or the “Company”) is committed to conducting its procurement activities in a responsible and sustainable manner that supports ethical business practices, safeguards people, and minimizes environmental impact.

**2. Purpose**

This Policy aims to:

- a. Promote responsible sourcing across ACME’s value chain
- b. Align procurement practices with applicable laws and recognized ESG principles
- c. Encourage suppliers and business partners to adopt sustainable and ethical practices
- d. Support long-term value creation through responsible resource use and risk management

**3. Applicability**

This Policy applies to: (a) all employees and directors of the Company involved in procurement and vendor management activities; (b) employees and directors of subsidiaries and entities where the Company exercises management or operational control, to the extent such entities undertake procurement activities (“Group Entities”); and (c) contractors, suppliers, service providers and other third parties engaged by the Company or its Group Entities, to the extent relevant to their engagement.

This Policy should be read in conjunction with ACME’s Supplier Code of Conduct, which sets out detailed expectations applicable to suppliers and business partners.

**4. Guiding Principles**

ACME seeks to integrate sustainability considerations into procurement decisions and supplier engagement across the following areas:

- a. **Ethical Business Conduct:** ACME promotes integrity, transparency, and accountability in its procurement processes. The Company encourages suppliers to:
  - i. Conduct business ethically and with integrity
  - ii. Avoid conflicts of interest, bribery, and anti-competitive practices
  - iii. Protect confidential information and intellectual property
  - iv. Maintain appropriate governance systems and internal controls
- b. **Social and Labour Practices:** ACME supports respect for human rights and fair labour practices across its value chain. The Company encourages suppliers to:
  - i. Uphold fair working conditions and dignity of labour
  - ii. Avoid child labour, forced labour, and discriminatory practices
  - iii. Promote diversity, inclusion, and equal opportunity
  - iv. Provide safe and healthy working environments
- c. **Environmental Responsibility:** ACME seeks to minimise environmental impact through responsible procurement practices. The Company encourages suppliers to:

- i. Comply with applicable environmental laws and regulations
  - ii. Improve resource efficiency, including energy and water use
  - iii. Reduce greenhouse gas emissions and waste generation
  - iv. Promote environmentally responsible production and sourcing practices
- d. **Health, Safety and Well-being:** ACME prioritizes safe and responsible operations and encourages suppliers to:
  - i. Maintain appropriate health and safety standards
  - ii. Promote a culture of safety and well-being
  - iii. Implement suitable systems to manage operational risks
- e. **Sustainable Products and Lifecycle Approach:** ACME encourages procurement of goods and services that are:
  - i. Responsibly manufactured
  - ii. Resource-efficient
  - iii. Designed with consideration of lifecycle impactsDepartments are encouraged to evaluate procurement decisions based on long-term sustainability considerations, where feasible.
- f. **Business Continuity and Resilience:** ACME encourages suppliers to maintain appropriate preparedness for operational disruptions, including natural events or unforeseen circumstances, to support continuity of supply.

## 5. **Supplier Engagement**

ACME seeks to build long-term relationships with suppliers that share its commitment to responsible business practices.

- a. ACME may adopt a risk-based approach to supplier engagement and evaluation
- b. The Company may request relevant information or documentation relating to sustainability practices, where appropriate
- c. Suppliers are encouraged to collaborate with ACME in improving sustainability outcomes across the value chain

## 6. **Reporting and Grievance Redressal Mechanism**

Suppliers and stakeholders who wish to raise concerns related to unethical conduct, non-compliance, or sustainability issues may do so by contacting the Company's Compliance Officer or through the Company's established grievance redressal mechanism, as communicated from time to time. The Company shall endeavour to address all concerns in a fair, timely, and confidential manner. No person shall be subject to retaliation for raising a concern in good faith.

## 7. **Governance and Implementation**

The Board of Directors is responsible for the approval and oversight of this Policy. The Corporate Social Responsibility and Sustainability Committee of the Board shall oversee the implementation of this Policy and review its effectiveness periodically. Senior management and the relevant functional heads shall be responsible for operationalising this Policy across the Company's operations and ensuring compliance with its requirements.

**8. Review and Amendment**

This Policy is approved by the Board of Directors of ACME. This Policy shall be reviewed periodically, or earlier if warranted by changes in applicable laws, regulations, business operations, or stakeholder expectations. Any material changes to this Policy shall be subject to the approval of the Board of Directors.

**9. Version History:**

<b>Date of Board Approval</b>	<b>Particulars</b>	<b>Effective Date</b>
27 <sup>th</sup> March 2026	Introduction and implementation of Sustainable Procurement Policy	27 <sup>th</sup> March 2026