



LEADING THE WORLD'S
SUSTAINABLE ENERGY FUTURE



Relentless Integrity: How We Conduct Business Ethically

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Our Vision, Mission and Culture

OUR VISION

Leading the world's sustainable energy future

OUR MISSION

Provide cost-advantaged solar technology through innovation, customer engagement, industry leadership and operational excellence

OUR CULTURE

RELENTLESS ENERGY powers One First Solar.
We generate results through:



Agility

We continually evolve to take advantage of emerging opportunities. We are creative and resilient.



Collaboration

We achieve great things when working together toward shared goals. We help each other succeed.



Accountability

We do our best work every day and trust others to do the same.
We own the results of our actions.

Innovative and passionate people, working ethically and safely, are the foundation of our success.



Our CEO's Message

We are in a highly dynamic and increasingly competitive marketplace. Our long-term success is built on our culture of adapting to changing conditions while differentiating ourselves from the competition with an unwavering commitment to operating at the highest ethical standards in all parts of our business, everywhere we do business.

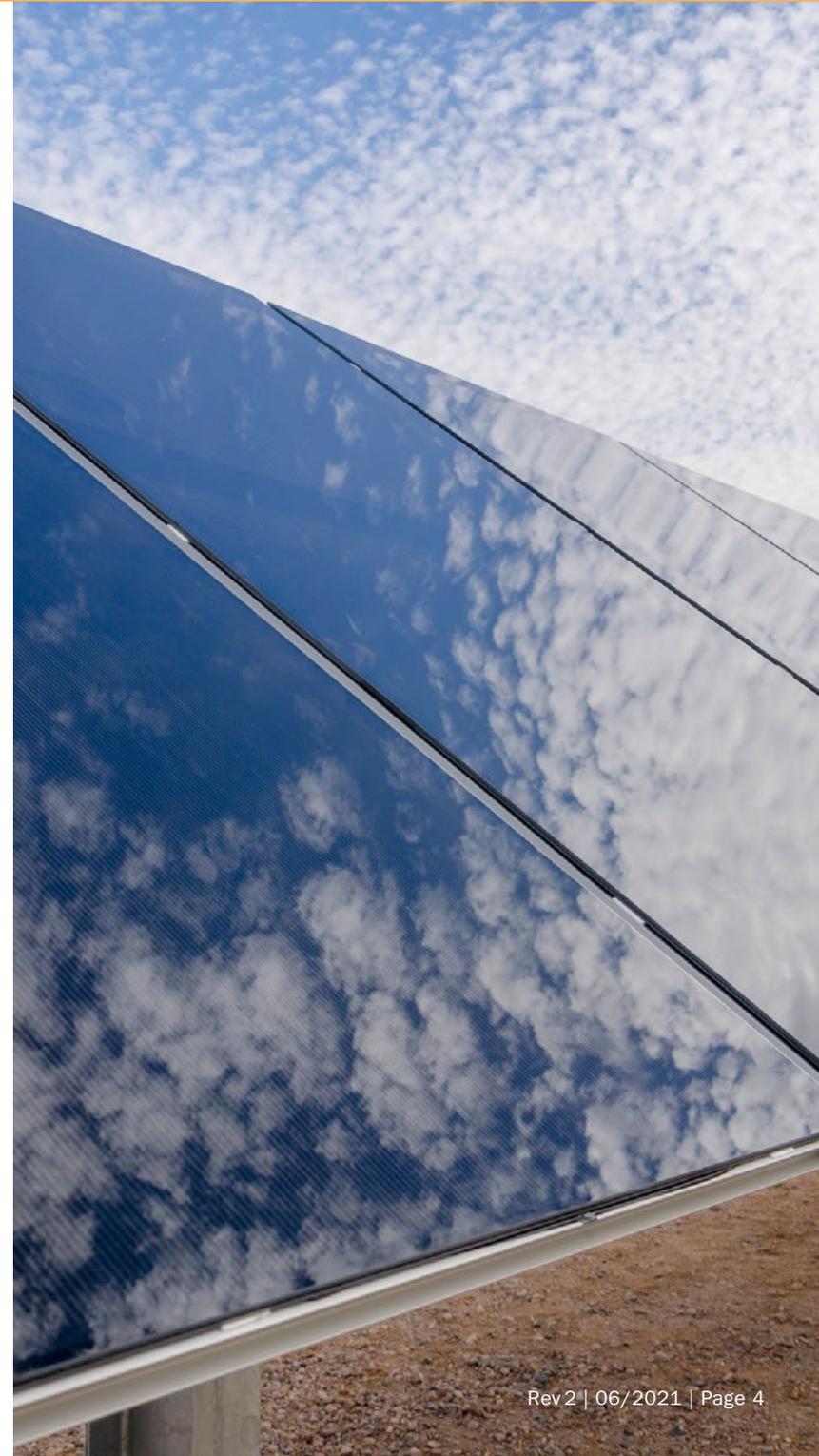
Relentless Integrity: How We Conduct Business Ethically (“our Code”) is an important resource designed to help us meet our business goals ethically. Our Code helps us navigate compliance risks and common issues we may face while conducting business for First Solar. While our Code covers many situations, it cannot address everything, so when the answer to an issue is not clear, [we seek help](#).

Relentless integrity is expected of everyone, and our Code applies to everyone, from members of the Board of Directors to our Officers, Associates and our valued partners. We all have responsibilities regarding compliance and ethics, and chief among those is to speak up: we should all speak up, ask questions and report any concerns we have, using the [resources our Code provides](#). First Solar does not tolerate retaliation against anyone who seeks help or reports concerns and will discipline those who engage in any retaliatory behavior.

Innovative and passionate people, working ethically and safely, are the foundation of our success. We must strive to make all decisions and take all actions in compliance with our [policies](#) and the law. When we operate in this way, we build trust with our associates, our customers and everyone with whom we do business. This trust becomes another point of differentiation and takes us further on our journey to lead the world's sustainable energy future.



Mark Widmar
Chief Executive Officer



Our Commitment to Our Code

WHY WE HAVE OUR CODE

Our Code, *Relentless Integrity: How We Conduct Business Ethically*, provides a firm foundation for the decisions we make and actions we take when conducting business for First Solar. Our Code describes risks we face, our expectations of one another and the [resources](#) we can use when we have questions or need to report concerns.

OUR RESPONSIBILITIES

The Code applies to everyone at First Solar, including all associates, officers and directors of the Company. We are all responsible for acting ethically and in compliance with all laws.

[We follow our Code, our policies and the law, and we speak up, ask questions and report any concerns we have.](#)

Failure to comply with our Code, our policies and the law may result in discipline, including dismissal.

OUR MANAGERS' ROLE

At First Solar, every one of us accepts responsibility for the results of our actions. As the front line of accountability for compliance, managers must model the highest standards of integrity for associates. Managers also:

- Keep an open door and encourage questions and reports
- Promote and maintain a respectful work environment
- Make sure associates understand our Code, our policies and all applicable laws
- Escalate reports of misconduct appropriately

WE DO NOT TOLERATE RETALIATION

First Solar does not tolerate any retaliatory behavior against those who ask questions, report concerns or cooperate in any investigations in good faith. "Good faith" means you believe the information you are providing is truthful and accurate. Anyone who engages in retaliatory behavior will be subject to discipline, including dismissal.

OUR INVESTIGATION AND DISCIPLINE PROCESS

First Solar takes reported questions and concerns very seriously and investigates those reports consistently. As associates, we do not investigate compliance concerns ourselves – we report them. First Solar treats reports confidentially to the extent possible and provides the option of reporting concerns [anonymously](#) where allowed by applicable law.



SEEKING ADVICE AND REPORTING CONCERNS

It's simple: we speak up, ask questions and report any concerns.

We all are responsible for bringing up issues that need to be reported; we cannot assume someone else will do it. We have several different resources we can report to:

- Your Manager
- Human Resources
- Compliance Department (compliance@firstsolar.com)
- [Our Ethics Hotline Website](#)
- [Policy Hub](#)

We face new and complex situations in our roles at First Solar every day, and sometimes it can be difficult to know which action is the right one to take. But these resources are here to help us with those questions and concerns. If you would like to ask a question or report something anonymously, you can always contact the Ethics Hotline.

So, reach out. Speak with your manager when questions arise. If your manager is unavailable, or if you prefer not to speak with your manager, then you should contact Human Resources or our Compliance Department. We also have an anonymous reporting system – our Ethics Hotline – that is available for you to use as well.

Q: Sally thinks that her co-worker May could be submitting inaccurate expense reports. She has no access to May's expense reports, but she has overheard May say more than once that she submits personal expenses for reimbursement. Sally likes May and does not want to get her in trouble, especially when she does not know for sure that there has been a violation. What should Sally do?

A: Sally should report her concern. When we have questions, it is always a good idea to seek help and guidance. As long as Sally is reporting an issue in good faith, she need not be right about the allegation. Furthermore, Sally is not obligated to conduct an investigation herself, just report her concerns.



Our Commitment to Fellow Associates

WORKING TOGETHER RESPECTFULLY

We achieve great things when we work together. A diverse team with varied experiences allows us to be agile and seek creative solutions. Our First Solar team is strong precisely because of our commitment to inclusion, belonging, diversity and mutual respect. In service of that commitment, we never make any employment-related decisions based on characteristics such as color, national origin, ethnicity, religion, gender, gender identification or expression, sexual orientation, marital status, age, disability or veteran status.

In helping each other succeed, we maintain a respectful workplace and show zero tolerance toward harassment or bullying of any kind, belittling or degrading comments and unwelcome sexual advances or comments.

Harassment is unwelcome conduct that is based on someone's personal characteristics where the conduct can create a work environment that is intimidating, hostile or abusive. It can include but is not limited to:

- Unwanted physical contact
- Unwanted sexual advances or attention
- Excluding, degrading, ridiculing or belittling others
- Verbal abuse, spreading rumors or making insulting jokes

[Speak up](#) and report harassing or discriminatory behavior whether it's directed at us or at others. Managers aware of behavior that violates our policy should seek advice from Human Resources. We are prohibited from retaliating against anyone reporting concerns of discrimination or harassment.

Q: Robert notices that his manager, Victor, sometimes says inappropriate things to some of the female associates in their office. Victor never says anything improper to Robert, and Robert cannot tell if his fellow associates are bothered by the comments. Robert does not think it is right but assumes that his co-workers would make a report if they were bothered by the behavior. Is this the right response?

A: No. Robert should report the conduct. We are all responsible for maintaining a respectful work environment that supports inclusion and belonging. Even if we are not subject to the harassing behavior, we have a duty to our fellow associates to [speak up](#) when we see such conduct.

FIND OUT MORE:



[See Additional Resources on our Policy Hub.](#)

WORKING TOGETHER SAFELY

We do our best work every day, and we work safely every day by following all company policies, laws and regulations that apply to our operations. Each of us must stay alert to potential workplace hazards and contact the [health and safety operations](#) when we have concerns. Each of us is also responsible for the workplace we share.

If you are unsure about what laws, procedures, regulations or standards to follow, ask your manager, or contact the [Safety Department](#).

We never work impaired. To stay alert in our workplace, we do not possess or use alcohol or illegal drugs, nor misuse any prescription medication.

We also never bully, intimidate or make any threats of violence while working onsite at First Solar. Firearms and weapons are prohibited at our workplace.

If you are aware of a safety issue, contact the [Safety Department](#).

PROTECTING EMPLOYEE PRIVACY

We respect each other and, by extension, we respect the privacy of our fellow associates. We protect personal information and never disclose that information unless we have the authority and a business reason to do so. We follow all applicable privacy laws, and when we collect, use, transfer or communicate any personal information, we are careful to do so in a manner consistent with our policies and the law.

If you are ever unsure about our [policy](#) or the law regarding the use of personal information, [speak up](#) and ask your manager or another resource listed in our Code.

FIND OUT MORE:



[See Additional Resources on our Policy Hub.](#)



Our Commitment to the Community

PROTECTING THE ENVIRONMENT

Leading the world's sustainable energy future is our vision. It informs our daily work and our push to succeed with integrity. In taking our commitment to sustainability seriously, we follow all [policies and procedures](#) governing activities that could impact the environment, making sure we understand the policies and procedures that apply to our role.

If you have any questions about those policies and procedures, you should [speak up](#) and ask your manager.

PROTECTING THIRD PARTIES' PERSONAL DATA

In many places where we do business, there are privacy laws and regulations that govern the collection, storage and use of personal information. These regulations include the General Data Protection Regulation ("GDPR") and the California Consumer Privacy Act

("CCPA"), among others. Any personal information related to identifying an individual, including but not limited to name, email, account information or government identification number, may be covered by these laws and regulations.

In addition to protecting the personal information provided to us by third parties, including our customers and business partners, we must follow all agreements we have with third parties regarding the confidentiality, privacy and use of personal information.

If you have questions, please review our [Global Data Protection Policy](#), and if you need to report a concern, speak up and ask your manager or any other resource listed in our Code.

FIND OUT MORE:



[See Additional Resources on our Policy Hub.](#)

SUPPORTING HUMAN RIGHTS

Our business is about people. We are focused on improving the future of our planet through technology, innovation and teamwork. As an extension of our respectful workplace, we stand for fundamental human rights and the dignity of workers everywhere. Therefore, we do not accept as partners any third parties who use or condone the use of child labor, forced labor or any kind of involuntary servitude. We comply with all applicable laws regarding workplace conditions and follow all applicable labor standards. We seek to identify and eliminate the use of conflict minerals in our operations, and we comply with our obligations under the applicable law. Please see our [Conflict Minerals Policy](#) for reference.

If you have a question about our [Labor and Human Rights Policy](#) or would like to report any concerns, [speak up](#) and ask your manager or another resource listed in our Code.

FIND OUT MORE:



[See Additional Resources on our Policy Hub.](#)



PARTICIPATING IN POLITICS

First Solar's vision for a better, sustainable future means that associates are encouraged to individually explore their interests in political issues and candidates. However, we must always make it clear that any political activity we engage in is on our own personal behalf and that our action does not reflect First Solar's position or endorsement. We cannot use First Solar's assets and funds to support political candidates, including using office equipment or working on a political campaign during work hours.

If you are planning to run for a political office, you must first obtain approval from Human Resources before you start any campaign.

If you have a question about our [Government Affairs Policy](#) , [speak up](#) and ask your manager or another resource listed in our Code.

FIND OUT MORE:



[See Additional Resources on our Policy Hub.](#)

Q: Franklin has decided to run for his local city council. He makes sure not to spend company time on the campaign, and only works on his campaign during his off-hours and weekends. Is this okay?

A: No. While it is appropriate that Franklin is not using First Solar assets for his campaign, he failed to get advanced approval from Human Resources before he began his campaign.

GIVING RESPONSIBLY TO CHARITY

Our vision for sustainable energy powers a great many things, including a strong willingness to give back to our communities and provide resources and assistance to worthy causes. First Solar encourages associates to get involved in their communities and to participate in charitable activities, as long as that participation is consistent with our values, our Code and our policies.

Associates should not use First Solar's property or assets for charitable activities unless the activity is officially sponsored by the company.

Associates also cannot participate in charitable activities during working hours or suggest that the company endorses or supports any charitable activity unless that activity is one that is officially sponsored by First Solar.

If you have a question about charitable activities, [speak up](#) and ask your manager or another resource listed in our Code. You can also review our [Global Donation Policy](#).



Our Commitment to Ethical Business

AVOIDING CORRUPTION AND BRIBERY

While we compete vigorously in a global market and pride ourselves on our creativity and agility, we never compromise our integrity and never engage in any corrupt behavior or bribery. There are strict U.S. and international laws that prohibit bribing or accepting bribes from commercial partners or any government officials, including employees of government-run or controlled companies.

A bribe is something offered or accepted in order to influence decision-making or secure business. Bribes are not just cash but can be anything that has value, including gifts, favors, charitable and political contributions or entertainment.

We never offer or accept anything of value if it is meant to secure business or improperly influence our decision-making or the decision-making of others. “Anything of value” is just that – anything that has value, which can include but is not limited to cash, gifts, entertainment, travel, donations, favors and business or employment opportunities.

Even small payments made to government officials to perform a routine action, such as paying a fee to receive a permit, can violate the law and our policy. You should contact the Compliance Department or the Legal Department if anyone ever asks you to pay such “fees” or if a commercial partner asks you to provide anything of value to secure a business goal.

See the Exchanging Gifts and Entertainment Responsibly section of our Code or review [gift approval guidance](#) if you plan to offer or are offered such an item or entertainment. [See Gift or Entertainment Request hub for submissions on required approvals.](#) You can also review our [Global Anti-Corruption Policy](#).

Just as we cannot bribe, we cannot allow any third parties acting on our behalf to offer or accept bribes. If you have any questions about the requests or actions of a third party acting on First Solar’s behalf, you should immediately report those concerns to the Legal Department.

Corruption and bribery issues can be complex, so you should [speak up](#) and contact the Compliance Department to ask questions or discuss any payment, gift or travel circumstance that seems questionable.

FIND OUT MORE:



[See Additional Resources on our Policy Hub.](#)

Q: Hugo is trying to complete an equipment sale to a government-owned power generation company overseas when the purchasing agent suggests that Hugo arrange for her and her husband to travel to the U.S. to visit a First Solar facility at First Solar’s expense. What should Hugo do?

A: Hugo should politely decline to make the arrangements and contact the Compliance Department. Such travel might violate not only our anti-bribery policies and the law, but the rules of the purchasing agent’s company as well, since many government officials cannot accept any gifts whatsoever.

AVOIDING MONEY LAUNDERING

It's important we know who we do business with. We have processes in place to verify the identity of potential customers and other third parties, and we should always conduct [due diligence](#) before we start conducting business with a new customer or partner. We must also look for the signs of money laundering when conducting business with our customers and other third parties. Money laundering is the illegal process of concealing the true origin of illicit funds through transactions that appear to be legitimate.

If you have questions about a business transaction, or you engage with a business partner who refuses to provide information about their identity or common transaction details, or who makes unexplained changes to the transaction, you should immediately [speak up](#) and report these concerns to the Compliance Department or the Legal Department.

COMPETING FAIRLY

We believe in a fair marketplace and know that the quality of our products and services, coupled with our strong focus on our customers, determines our success. We follow all applicable antitrust and competition laws worldwide, and we deal fairly with our customers, suppliers, competitors and other third parties. When we speak about our products and services, we do so proudly but accurately.

When we are interacting with our competitors, we neither discuss nor make any agreement with them about prices, marketing, strategy, markets or territories, nor do we discuss any other confidential or non-public information.

Competition laws and regulations can be complex. If you have any questions at all about interactions with competitors or [our policy](#), please [speak up](#) and contact the Compliance Department.

Q: While walking around a solar power trade show, Shannon, a First Solar associate, meets Donald, who works for a competitor. Donald starts talking to her about First Solar and his company pooling resources to better understand some of the emerging markets. He asks Shannon if she knows anything about First Solar's strategies in those markets. What should Shannon do?

A: Shannon should not discuss any of First Solar's plans with a competitor, and she should immediately end the conversation and inform the Compliance Department about the contact with Donald.

AVOIDING CONFLICTS OF INTEREST

One way to demonstrate accountability for our actions is by never putting our private interests ahead of the interests of First Solar. Even circumstances that only appear to create a conflict of interest – that is, a conflict between our personal interests and the interests of the company – can damage First Solar's reputation and our own as individuals.

This is why we proactively disclose any potential [conflicts of interest](#) to Human Resources or to the Compliance Department as soon as they develop or become apparent.

Some common situations that can give rise to conflicts include:

- When we have any outside employment at all or a business opportunity with a First Solar supplier, competitor or business partner
- When we pursue opportunities we've discovered through our role at First Solar or that compete in any way with the company

- When we, or a close friend or family member, are engaged in business with First Solar or have a financial interest in doing business with First Solar
- When we supervise, or are supervised by, a close friend or family member

While associates may not serve as directors of any outside business organization without appropriate approval after disclosing the opportunity on a [Conflict of Interest form](#), Conflict of Interest form, not all outside activities are conflicts of interest. We should all use sound judgment when considering outside activities and opportunities and disclose those activities that could pose a conflict or might have the appearance of a conflict.

Conflicts of interest can be confusing, so if you have any questions or concerns, you should [speak up](#) and contact Human Resources, the Legal Department or the [Compliance Department](#).

FIND OUT MORE:



[See Additional Resources on our Policy Hub.](#)

Q: A First Solar customer wants to hire Geetha as a contractor to help them with their marketing campaign. While she works in marketing at First Solar, she does not believe that the customer's business competes with First Solar at all. She also plans to work on the customer's campaign only during evenings and weekends. Is this okay?

A: While this may not be an actual conflict, it has the potential to be seen as one, so Geetha should disclose the opportunity to the Legal Department or the [Compliance Department](#) before she agrees to the work.

PROTECTING OUR ASSETS

It is hard to achieve great things without the proper tools. Just as First Solar provides associates with the necessary resources to get the job done, so is it our responsibility to look after those resources and make sure they are properly used and protected.

We must safeguard company resources from loss, damage, misuse, theft, embezzlement or destruction. Assets such as company equipment, materials and facilities should be managed carefully and never be subject to waste. We use company assets only for business purposes, including using technology assets such as company-issued computers, tablets and phones only for First Solar business.

If you have any questions about appropriate asset use, or want to report a concern, [speak up](#) and contact your manager or one of the other resources listed in our Code.

PROTECTING INFORMATION

Our most important assets are our ideas and creative solutions. The assets we develop to meet our business needs must be protected. If disclosed, confidential information including all non-public information, such as trade secrets, can be harmful to First Solar and advantageous to our competitors; it must be kept safe in accordance with any security procedures or directions from our manager.

We must all do our part to protect First Solar's confidential information, and our confidentiality obligation does not end even when we leave the company.

We also safeguard confidential information that customers and other business partners entrust to us, and we must abide by any non-disclosure agreements we have with those parties.

We share confidential information only when authorized to do so and only with those specifically authorized to access or use it.

First Solar also has valuable intellectual property that is used or created every day. This intellectual property can take various forms, such as business plans, engineering and manufacturing ideas, tools, manufacturing processes, future product plans, roadmaps and other non-public company or financial records. Any intellectual property that we create within the scope of our employment at First Solar belongs to the company, and we use all measures to secure intellectual property just as we do for other confidential information.

If you have any questions about [confidential information](#) or [intellectual property](#) policies, please contact your manager, a legal representative in the Intellectual Property Law Department, or the Compliance Department.

FIND OUT MORE:



[See Additional Resources on our Policy Hub.](#)

GIFTS AND ENTERTAINMENT

The giving and receiving of gifts and entertainment must be considered carefully. We can never give or receive anything if the gift or entertainment could be seen as an attempt to influence decision-making.

A “gift” is anything of value given from one party to another without payment. Gifts can include but are not limited to:

- Tangible objects such as clothing, spirits or other items
- Hospitality, such as food, beverages or accommodations
- Attendance at events or gatherings that is provided free of charge
- Donations made in the recipient’s name

We all have a responsibility to make sure that the gifts or entertainment we give and accept are reasonable and legitimately business-related. We must avoid the appearance of any conflict of interest or any attempt at improper influence. Please also review our Code’s Avoiding

Corruption and Bribery section for further guidance on exchanging gifts and entertainment with government officials and commercial partners. Remember, we do not provide any gifts or entertainment to any government official or commercial partner, no matter how small the value, without prior approval and consultation.

We do not offer nor accept any gifts or entertainment valued more than USD\$100 unless first approved by our manager or a more senior company official. Seek guidance if you are offered such an item or entertainment. See our [Gift or Entertainment Policy](#) and the [Online Approval Request Form](#) for further information.

If you have any questions about whether a particular gift or entertainment should be accepted or provided, you should [speak up](#) and contact Human Resources, the Legal Department or the Compliance Department.

FIND OUT MORE:



[See Additional Resources on our Policy Hub.](#)

Q: Lim is part of the team reviewing requirements for a supplier that is trying to secure business with First Solar. The supplier’s representative mentions that his company has two season tickets for the local basketball team, and he cannot use them for a game next week. He offers the pair of tickets to Lim. Can he accept?

A: No. Tickets to a professional sporting event are typically expensive, and Lim’s position reviewing the supplier’s qualifications could call into question the gift’s influence on his decision-making. Furthermore, it would be hard to believe that there is a business purpose in Lim attending the game, since the supplier would not even be present.

WORKING WITH THIRD PARTIES

We work only with business partners who share our values and have the experience, skill and resources to do the job right. We never select partners, suppliers, vendors or other third parties based on any criteria other than their suitability for the work.

We also treat our business partners fairly and objectively, whether we are selecting them, overseeing their work or reviewing their performance, and we always follow all First Solar policies and procedures regarding procurement, sourcing and purchasing.

If you have any questions about our business partners, please [speak up](#) and ask your manager or another resource listed in our Code.

KEEPING ACCURATE RECORDS

We must keep accurate records for our business to be a success, to make informed business decisions and to meet our reporting obligations to our external stakeholders. Our business records can include but are not limited to financial reports, accounting records, timecards, business plans, environmental reports, accident reports and expense reports. Our records must accurately and completely reflect our business transactions, and we must enter them in a timely fashion.

We follow all policies and procedures, including those related to appropriate record storage and destruction, and we are responsible for learning to properly apply the procedures related to any books or records that we use or manage.

We never conceal, alter, damage or destroy any company record, and we follow instructions from the Legal Department to maintain and preserve records in the event of investigation or litigation.

If you have a record-keeping question, [speak up](#) and ask your manager or another resource listed in our Code.

FOCUSING ON QUALITY AND CUSTOMER SERVICE

We seek to provide only the best quality products and the best customer service. We follow all our internal specifications, as well as all regulations and laws that apply to our products and services to make sure we meet our customers and partners expectations as well as our own.

If you have any questions about quality or customer service, you should [speak up](#) and seek guidance from your manager or other management, or you may contact our [Ethics Hotline](#).

IMPORT AND EXPORT COMPLIANCE

In every country where we do business, there are often complex and sometimes vague regulations that govern imports, exports and other trade law requirements.

“Imports” occur when we bring products, services or technology into the country from a foreign country. When importing products, services or technology, we should determine if there are any applicable duties, fees or tariffs that apply to the import and make sure we know its origin and value.

“Exports” take place when products, components and materials are sent to a foreign country. An export can also occur when technology or a product is provided to a non-U.S. citizen, even if he or she is physically located in the United States. Before we export, we must verify the eligibility of the recipient and obtain prior approval.

We must always do our best to ensure we are not doing any business with states, organizations or individuals on any sanction listing. For guidance on import and export issues, email Trade Compliance (FSTradeCompliance@firstsolar.com).

Since First Solar operates globally, any employee involved in exports or imports must be aware of the trade laws that can apply to the sale and transport of our products and technology. If your role requires potentially exporting or importing any item, make sure you are familiar with the rules, and contact Trade Compliance (FSTradeCompliance@firstsolar.com) to ask questions if you are unsure.

COMMUNICATING RESPONSIBLY

In every communication on behalf of First Solar – spoken and written – we must always be accurate, clear, respectful and professional regardless of the format or platform of the communication. This includes but is not limited to email, text messages, social media posts, telephone calls, voicemails, presentations and all other forms of communication.

You should not speak on behalf of First Solar if you are not authorized to do so. If you do make public comments, including comments on social media platforms, be clear that you are speaking only for yourself and not on behalf of the company.

Furthermore, while social media can be an incredible tool, when we use it, remember that our values, our Code and our policies apply online as well. This means we do not reveal any confidential information, nor do we bully, harass or otherwise violate our Code or our policies wherever we are communicating.

Keep in mind that whatever you post online or write in emails may be available forever, and since your communications reflect your reputation and that of the company, take care to always be responsible, accurate and respectful.

If you have a question about our [communication policy](#), speak up and ask your manager or another resource listed in our Code.

- Q:** Siti is excited about new products she is working on for First Solar and wants to share some information with friends on her social media networks. Is this okay?
- A:** Possibly. Siti should proceed with caution and make sure she is not revealing any confidential information online. She should remember that our Code and our policies apply online and make sure she is complying with them in the social media space.

AVOIDING INSIDER TRADING

In our roles at the company, we may learn information that is not yet publicly known about First Solar, our customers, industry participants, partner companies, competitors or others.

Internal information about new products, upcoming business events such as mergers or sales and financial results, are some of just many examples of “insider information” - material, non-public information – non-public, material information that a reasonable investor would consider when deciding whether to buy, hold or sell a company’s stock.

It violates the law and our policy to trade on such information, so we never buy or sell stock based on material, non-public we have learned at First Solar, nor do we provide, or “tip,” such insider information to anyone else.

First Solar also has additional specific rules regarding directors, officers and associates trading in company securities. If you have questions about our [Insider Trading Compliance Policy](#) and how these rules might apply, you should [speak up](#) and contact Investor Relations or the Legal Department.

FIND OUT MORE:



[See Additional Resources on our Policy Hub.](#)

Waiver

Our Code cannot be waived unless a waiver is specifically granted by the Board of Directors.

Speaking Up

Remember: we have several different resources we can use to ask questions or report concerns. First Solar does not tolerate any retaliation against those who Speak Up:

- Your Manager
- Human Resources
- Compliance Department (compliance@firstsolar.com)
- [Our Ethics Hotline Website](#)
- [Policy Hub](#)

ADDITIONAL RESOURCES:

- [Internal Audit](#)
- Legal Department