

GRIEVANCE AND REMEDIATION POLICY

June 2026

1. Purpose and Scope

SunPower Corporation Australia Pty Ltd ("SunPower Australia") is committed to providing accessible, confidential, and fair mechanisms for reporting and addressing concerns and grievances related to labour practices, human rights, and workplace conditions. This policy establishes how SunPower Australia will receive, investigate, and respond to grievances from workers, contractors, and other stakeholders.

This policy is complementary to and aligns with TCL Zhonghuan's broader labour practices and remediation framework.

This policy applies to all individuals in our direct operations and the operations of our suppliers and business partners. Any individual may report a grievance through the channels outlined in this policy.

2. Scope of Grievances

This policy addresses concerns and grievances including but not limited to:

- Forced labour, human trafficking, bonded labour, or debt bondage
- Child labour or exploitative working conditions
- Wage and payment issues, including wage theft or deductions
- Excessive working hours or restricted time off
- Discrimination, harassment, or bullying
- Unsafe or unhealthy working conditions
- Restrictions on freedom of movement or association
- Violations of applicable labour, employment, or human rights law
- Retaliation for reporting concerns or cooperating with investigations

3. Reporting Channels

Grievances can be reported through multiple confidential channels:

- Email: whistleblowing.au@sunpowerglobal.com
- In-person to facility management or a designated representative
- Anonymous submission via secure online form
- Third-party hotline or reporting service (where applicable)

All reporting channels are available 24/7 or during extended hours. SunPower Australia will make grievance reporting channels accessible to workers in their language.

4. Confidentiality and Protection

All grievances are treated as confidential. SunPower Australia will:

- Not disclose the identity of a reporter without prior written consent, except where required by law
- Accept anonymous grievances and process them with the same urgency and fairness as named reports
- Limit access to grievance information to those with a documented need to know
- Protect all individuals involved in reporting, investigation, or remediation from retaliation or adverse treatment

Retaliation of any kind against a reporter or witness is strictly prohibited and will be investigated as a separate matter.

SunPower Australia ensures that all disclosures made in good faith are protected under applicable Australian law, including the whistleblower protections in the Corporations Act 2001 (Cth).

5. Investigation Process

Upon receipt of a grievance:

- SunPower Australia will acknowledge receipt within 2 business days
- An initial assessment will be conducted to determine the nature, severity, and scope of the concern
- A formal investigation will begin within 5 business days
- The investigation will be conducted by trained, impartial investigators (internal or third-party)
- All interviews, evidence, findings, and conclusions will be documented
- Investigation timelines will be communicated to the reporter, with updates provided as appropriate
- Estimated investigation duration is 30-60 calendar days, depending on complexity

6. Remediation and Resolution

Where a grievance is substantiated:

- Any ongoing violation or harmful practice will be ceased immediately
- Appropriate and proportionate remediation will be provided to affected individuals
- For worker grievances, remediation may include reinstatement, wage remediation, leave entitlements, medical support, or other appropriate measures
- For supplier grievances, the company will require implementation of documented corrective action plans
- Systemic issues will be addressed through process improvement and policy updates

7. Supplier Grievance Escalation

For grievances in supplier operations:

- The supplier will be notified and required to acknowledge receipt within 5 business days
- The supplier will conduct an investigation in parallel with SunPower Australia oversight
- If the supplier does not respond adequately, SunPower Australia will consider direct investigation or escalation
- Persistent non-compliance or failure to remediate may result in contract review or termination

8. Governance and Oversight

This policy is overseen by:

- Frank Zhang (Director) - ultimate accountability
- Natalie Rompotis (Senior Legal Counsel & Company Secretary) - legal and compliance oversight
- James Grant (Commercial & ESG Lead) - operational implementation and supplier management
- Marlene Brangetto (Marketing Director & ANZ ESG Lead) - grievance coordination
- Tony Hong Xiong (TCL Zhonghuan HQ) - alignment with parent company standards and data provision

9. Policy Review and Updates

This policy is effective June 2026 and will be reviewed and updated periodically.