

CONFLICT MINERALS POLICY

June 2026

1. Purpose and Scope

SunPower Corporation Australia Pty Ltd (referred to as "we", "us", "the company" and "SunPower Australia") is committed to responsible supply chain management and the responsible sourcing of materials used in the manufacture of solar photovoltaic modules and components. This policy establishes our commitment to avoiding the sourcing of conflict minerals and our framework for conducting supply chain due diligence.

This policy is complementary to and aligns specifically with TCL Zhonghuan's Conflict Minerals Policy (April 2024) and is informed by TCL Zhonghuan's broader responsible procurement framework.

This policy applies to SunPower Australia, all its operations, and all business partners including Tier 1 suppliers and critical Tier 2 suppliers.

2. Definitions

Conflict minerals refer to tin, tungsten, tantalum, and gold (3TG minerals) and their derivatives. This policy also addresses other materials critical to our supply chain, including polysilicon, metallurgical-grade silicon, and aluminium.

High-risk areas are defined as countries or regions associated with armed conflict, human rights violations, or serious governance failures that may contribute to funding conflict.

3. Policy Commitments

SunPower Australia commits to:

- Conducting supply chain due diligence, in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, to identify and assess conflict mineral risks and ensure minerals are not sourced from high-risk areas
- Not knowingly sourcing minerals from operations associated with human rights abuses, forced labour, or conflict funding
- Requiring all suppliers to confirm that products do not contain minerals sourced from high-risk areas or operations not meeting responsible sourcing standards
- Maintaining transparent records of mineral sourcing, supplier compliance, and supply chain mapping
- Responding transparently to customer and stakeholder inquiries regarding mineral sourcing and due diligence practices
- Engaging with suppliers on continuous improvement in responsible sourcing practices

4. Supplier Requirements and Engagement

All Tier 1 suppliers must:

- Complete our annual Supplier Self-Assessment Questionnaire regarding mineral sourcing, supply chain transparency, and compliance with this policy
- Sign the Commitment Letter on Non-use of Conflict Minerals confirming that they do not use conflict minerals and comply with responsible sourcing requirements
- Provide detailed information on the origin and sourcing of conflict minerals and other critical materials
- Identify smelters and refineries in their supply chain and maintain records of material sourcing, and support traceability investigations using Responsible Minerals Initiative (RMI) reporting templates, including the Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT)
- Cooperate with third-party verification and audit requests
- Implement and document corrective action plans if non-compliance or risks are identified
- Cascade these requirements to their own sub-suppliers

5. Due Diligence Process

SunPower Australia conducts supply chain due diligence through:

- Annual Supplier Self-Assessment Questionnaires to collect baseline information on mineral sourcing and supply chain transparency
- Risk assessment of suppliers based on sourcing geography, operational transparency, and prior compliance history
- Third-party verification and audit of supplier supply chain practices where risks are identified
- Customer due diligence responses and stakeholder inquiries regarding mineral sourcing
- Monitoring of supply chain integrity and traceability, particularly for critical materials such as polysilicon

Where risks are identified through due diligence, SunPower Australia will work with suppliers on remediation and corrective action. Persistent non-compliance may result in review of the supply relationship or contract termination.

6. Supplier Non-Compliance

If a supplier is found to have violated this policy or supplied minerals from high-risk areas:

- SunPower Australia will notify the supplier and provide a reasonable timeframe for corrective action
- The supplier must provide a documented plan addressing the non-compliance
- SunPower Australia will verify completion of corrective actions
- Persistent or serious non-compliance may result in suspension of orders, contract termination, and pursuit of remedies for any resulting losses

7. Governance and Oversight

This policy is overseen by:

- Frank Zhang (Director, SunPower Australia) - ultimate accountability and annual review
- Natalie Rompotis (Senior Legal Counsel & Company Secretary) - legal oversight and compliance
- James Grant (Commercial & ESG Lead) - operational implementation and supplier management
- Marlene Brangetto (Marketing Director & ANZ ESG Lead) - supply chain coordination and customer engagement
- Tony Hong Xiong (TCL Zhonghuan HQ) - alignment with parent company policy and data provision

8. Reporting and Transparency

SunPower Australia reports on conflict minerals due diligence in:

- Annual Modern Slavery Statement (regulatory requirement under the Modern Slavery Act 2018 (Cth))
- Customer due diligence questionnaires and supplier audits
- Stakeholder inquiries and public disclosures as appropriate

9. Policy Review and Updates

This policy is effective June 2026 and will be reviewed and updated periodically and as merited when material changes occur in our supply chain or regulatory environment.