

SUPPLY CHAIN RESPONSIBILITY POLICY

June 2026

1. Purpose and Scope

SunPower Corporation Australia Pty Ltd ("SunPower Australia") is committed to responsible and ethical supply chain management. This policy establishes our framework for assessing supplier risks, engaging suppliers on compliance with labour, human rights, and environmental standards, and monitoring ongoing performance.

This policy is complementary to and aligns with TCL Zhonghuan's broader supply chain responsibility framework.

This policy applies to our direct operations and to all direct suppliers (Tier 1) and critical sub-suppliers (Tier 2) providing materials, components, and services to SunPower Australia. All suppliers are required to comply with this policy and communicate these expectations to their own suppliers.

2. Supplier Assessment and Risk Categorisation

SunPower Australia assesses supplier risk based on multiple factors:

- Sourcing geography and country-specific human rights and labour risks
- Labour intensity of operations and workforce composition
- Prior audit findings, compliance history, and corrective action implementation
- Supply chain complexity, transparency, and subcontracting practices
- Company size, governance maturity, and capacity to implement due diligence
- Willingness to engage with audits and provide supply chain information

Based on this assessment, suppliers are assigned to risk categories (high, medium, low) that determine the frequency and nature of engagement, monitoring, and verification activities.

3. Supplier Requirements

All suppliers must:

- Complete SunPower Australia's annual Supplier Self-Assessment Questionnaire addressing labour practices, supply chain management, and workplace rights
- Maintain documented policies addressing labour standards, health and safety, grievance mechanisms, and human rights
- Maintain a mechanism for workers to raise concerns confidentially and without fear of retaliation
- Cooperate with third-party verification, audit, and on-site inspection requests
- Respond transparently to customer due diligence questionnaires and stakeholder inquiries

- Implement corrective action plans when issues or risks are identified
- Maintain supply chain visibility and transparency, particularly for critical sourcing regions and materials
- Cascade responsibility and due diligence expectations to their own suppliers

4. Monitoring and Verification

SunPower Australia monitors supplier performance and compliance through:

- Annual Supplier Self-Assessment Questionnaires collecting information on labour practices and supply chain transparency
- Third-party verification and audit of supplier practices, proportionate to identified risks
- Customer due diligence responses and stakeholder inquiries regarding supplier practices
- Investigation and resolution of worker grievances and stakeholder concerns
- Review of supply chain integrity, traceability, and sourcing practices
- Engagement with suppliers on continuous improvement and remediation

5. Corrective Action and Remediation

When non-compliance or risks are identified:

- The supplier will be notified promptly and provided a reasonable timeframe for remediation
- The supplier must provide a documented plan addressing the non-compliance, including root cause analysis
- SunPower Australia will work with the supplier to verify completion of corrective actions
- Progress will be monitored and documented
- Persistent or serious non-compliance may result in suspension of orders, contract modification, or termination

6. Governance and Accountability

Supply chain responsibility is overseen by:

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

7. Reporting and Transparency

SunPower Australia reports on supply chain responsibility in:

- Annual Modern Slavery Statement (regulatory requirement under the Modern Slavery Act 2018 (Cth))
- Customer due diligence responses and supplier audit reports
- Industry and stakeholder disclosures as appropriate

8. Policy Review and Updates

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