

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

Form SD

SPECIALIZED DISCLOSURE REPORT

MAXEON SOLAR TECHNOLOGIES, LTD

(Exact name of registrant as specified in its charter)

Singapore

(State or other jurisdiction
of incorporation or organization)

001-39368

(Commission
File Number)

N/A

(I.R.S. Employer
Identification No.)

**38 Beach Road #23-11
South Beach Tower
Singapore 189767**

(Address of principal executive offices)

N/A

(Zip code)

**Frank Jeng, Chief Legal Officer
+65 6338 1888**

(Name and telephone number, including area code, of the person to contact in connection with this report.)

Check the appropriate box below to indicate the rule pursuant to which this Form is being submitted, and provide the period to which the information in this Form applies:

- Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2024.
- Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the fiscal year ended _____.

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

As provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD, a Conflict Minerals Report is provided as an exhibit to this Form SD and is available on Maxeon Solar Technologies, Ltd.'s (the "Company's") website at <https://corp.maxeon.com/investor-relations>. The information contained on the Company's website is not incorporated by reference into this Form SD or the Company's Conflict Minerals Report and should not be considered part of this Form SD or the Conflict Minerals Report.

Information concerning conflict minerals from recycled or scrap sources that may be contained in the Company's in-scope products is included in the Conflict Minerals Report and is incorporated in this Form SD by reference.

Item 1.02 Exhibit

The Conflict Minerals Report provided for in Item 1.01 is filed as Exhibit 1.01 to this Form SD.

Section 2 - Resource Extraction Issuer Disclosure

Item 2.01 Resource Extraction Issuer Disclosure and Report

Not applicable.

Section 3 - Exhibits

Item 3.01 Exhibits

| Exhibit No. | Description |
|--------------------|--|
| 1.01 | Conflict Minerals Report for the calendar year ended December 31, 2024 |

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

MAXEON SOLAR TECHNOLOGIES, LTD.
(Registrant)

By: /s/ Frank Jeng
Name: Frank Jeng
Title: Chief Legal Officer

Date: June 6, 2025

EXHIBITS

| Exhibit | Title |
|----------------|--|
| 1.01 | Conflict Minerals Report for the calendar year ended December 31, 2024 |

Conflict Minerals Report

Maxeon Solar Technologies, Ltd. has included this Conflict Minerals Report as an exhibit to its Form SD for 2024 as provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), and Form SD (collectively, the “Conflict Minerals Rule”). The date of filing of this Conflict Minerals Report is June 6, 2025.

Unless the context indicates otherwise, the term “Maxeon” refers to Maxeon Solar Technologies, Ltd. and its consolidated subsidiaries, and “Service Provider” refers to the third party retained by Maxeon to assist with supplier outreach and data validation of the responses received from suppliers. Some of the compliance activities described in this Conflict Minerals Report were performed by the Service Provider on behalf of and/or in coordination with Maxeon. As used herein and consistent with the Conflict Minerals Rule, “Conflict Minerals” or “3TG” are columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location of origin of the minerals or derivative metals.

This Conflict Minerals Report can be found on the Maxeon website at: <https://www.maxeon.com/financials-filings/sec-filings>. The information contained on the Company’s website is not incorporated by reference into the Form SD or this Conflict Minerals Report and should not be considered part of the Form SD or this Conflict Minerals Report.

Forward-Looking Statements

This document contains forward-looking statements within the meaning of Section 27A of the Securities Act of 1933, as amended (the “Securities Act”), and Section 21E of the Exchange Act. In particular, statements contained in this document that are not historical facts, including, but not limited to, statements concerning the additional steps that Maxeon intends to take to mitigate the risk that its necessary 3TG benefit armed groups, constitute forward-looking statements and are made under the safe harbor provisions of Section 27A of the Securities Act and Section 21E of the Exchange Act.

Forward-looking statements are subject to risks and uncertainties that could cause actual actions or performance to differ materially from those expressed in the forward-looking statements. These risks and uncertainties may include, but are not limited to, (1) the continued implementation of satisfactory traceability and other compliance measures by Maxeon’s direct and indirect suppliers on a timely basis or at all, (2) whether smelters and refiners (“SORs”) and other market participants responsibly source 3TG and (3) political, regulatory and economic developments, whether in the Democratic Republic of the Congo (the “DRC”) or an adjoining country (collectively, the “Covered Countries”), the United States or elsewhere. Maxeon cautions readers not to place undue reliance on any forward-looking statements, which only speak as of the date made. Maxeon undertakes no obligation to update any forward-looking statement to reflect events or circumstances after the date on which such statement is made.

Overview; Maxeon’s Products and Applicability of the Conflict Minerals Rule

Maxeon is one of the world’s leading marketers of premium solar power technology. We have developed and maintained this leadership position through decades of technological innovation and investment, in addition to the development of sales and distribution channels across six continents. Headquartered in Singapore, we are strategically restructuring our business portfolio and geographic market focus to concentrate exclusively on the U.S. market. Many of the products that Maxeon markets contain certain 3TG necessary to the functionality or production of such products. However, 3TG content continues to represent a small portion of the materials content of Maxeon’s in-scope products.

For a further discussion of Maxeon’s products, see its Annual Report on Form 20-F for the fiscal year ended December 31, 2024.

Maxeon is multiple levels removed from the mining of minerals (3TG or otherwise). Maxeon does not make purchases of raw ore or refined 3TG minerals directly from SORs and makes no purchases in the Covered Countries. However, through the efforts described in this Conflict Minerals Report, Maxeon seeks to ensure its suppliers are sourcing responsibly.

Maxeon does not seek to embargo responsible sourcing of 3TG from the Covered Countries or other conflict-affected and high-risk regions and encourages its suppliers to continue to source 3TG responsibly from these regions.

Reasonable Country of Origin Inquiry

To complete the “reasonable country of origin inquiry” (the “RCOI”) required by the Conflict Minerals Rule, Maxeon and its Service Provider engaged with suppliers to collect information about the presence and source of 3TG used in components, parts supplied to Maxeon. For its RCOI, to the extent applicable, Maxeon utilized the same processes and procedures as for its due diligence, in particular Steps 1 and 2 of the OECD Guidance (as defined below), which are discussed later in this Conflict Minerals Report. For 2024, Maxeon surveyed 35 suppliers as part of its RCOI (the “Suppliers”).

The results of Maxeon’s RCOI are discussed under “Findings Concerning Smelters and Refiners and Country of Origin Information.”

Due Diligence Measures

Design Framework

Maxeon utilizes due diligence measures for 3TG that are intended to conform with, in all material respects, the criteria set forth in the Organisation for Economic Co-operation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (Third Edition) (the “OECD Guidance”). The OECD Guidance established a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas. Application of the framework constitutes a part of the program that Maxeon has put in place to help ensure that the 3TG contained in its products are responsibly sourced.

Diligence Program

In furtherance of Maxeon’s 3TG due diligence, it performed the due diligence measures discussed below for 2024.

Compliance Team

In support of its compliance efforts, Maxeon has a compliance team that is charged with overseeing, implementing and providing feedback on its 3TG compliance strategy. The team consists of staff from Maxeon’s operations groups, under executive leadership. The members of the team and selected other internal personnel are familiar with the Conflict Minerals Rule, the OECD Guidance, Maxeon’s compliance plan, and the procedures for reviewing and validating supplier responses to Maxeon’s inquiries. Maxeon also utilized the Service Provider and specialist outside counsel to assist with and/or to advise it on certain aspects of its compliance.

Conflict Minerals Policy; Training Resources; Grievance Mechanism

Maxeon maintains a Conflict Minerals Policy. Under the Conflict Minerals Policy, Maxeon suppliers are required to acknowledge Maxeon’s Supplier Sustainability Guidelines, which incorporates the Conflict Minerals Policy. Under the Conflict Minerals Policy, Maxeon reserves the right to request additional documentation from its suppliers regarding the source of any 3TG included in their products. In addition, Maxeon reserves the right to ask suppliers to maintain traceability data for a minimum of five years. The Conflict Minerals Policy indicates that Maxeon will evaluate its relationships with its suppliers on an ongoing basis to ensure continued compliance with the Conflict Minerals Policy.

The Conflict Minerals Policy is communicated internally to Maxeon’s supply chain employees and to suppliers. In addition, the Conflict Minerals Policy is posted on Maxeon’s website at <https://corp.maxeon.com/static-files/7189df75-ef32-4397-bda9-06e6a11d50fe>.

In an effort to increase supplier awareness about Conflict Minerals and related regulatory requirements, to provide answers to frequently asked questions concerning 3TG mineral tracing, and ultimately to improve the accuracy and completeness of supplier responses, suppliers that were part of Maxeon's outreach received access to the Service Provider's online resources.

Maxeon has a grievance mechanism for reporting violations of its Conflict Minerals Policy. The grievance mechanism is available through the Conflict Minerals Policy. Violations may be reported by contacting Maxeon's Compliance and Ethics Helpline at <https://maxeon.ethicspoint.com>.

Data Collection; Records Storage and Retention

For 2024, Maxeon carried out due diligence on relevant components and parts in the products it manufactured. Maxeon's outreach included the 35 Suppliers that provided components or parts determined by Maxeon to contain or potentially contain necessary 3TG, and which were incorporated into products manufactured by Maxeon in the course of 2024.

Maxeon sent the Suppliers a request to submit a Conflict Minerals Reporting Template, which is the widely-used data collection form developed by the Responsible Minerals Initiative (the "RMI" and the "CMRT"), to gather information on the use of 3TG by the Suppliers, the source of the 3TG and the Suppliers' related compliance procedures. Maxeon gave the Suppliers the ability to provide information at a level at which they could most readily assemble the information (i.e., company, product, or user-defined), but required the Suppliers to declare the level of information provided. Following the initial introductions to the program and information request, reminder emails were sent to each non-responsive Supplier requesting survey completion. This outreach was managed by the Service Provider on Maxeon's behalf. Additional outreach also was conducted by Maxeon's staff on an as-needed basis to further emphasize the importance of suppliers completing the CMRT.

The Service Provider reviewed CMRT responses received from the Suppliers for plausibility, consistency and gaps. If any "quality control" flags were raised, Suppliers were contacted to clarify the concern. If the SOR was not identified as Conformant (as later defined) or the equivalent by the RMI, the London Bullion Market Association (the "LBMA") or the Responsible Jewellery Council (the "RJC"), the Service Provider attempted to contact the SOR to gain more information about its sourcing practices, including countries of origin and transfer, and due diligence procedures. In addition, for SORs that are not Conformant, the Service Provider searched public information to attempt to determine the SOR's sourcing practices.

Maxeon has an electronic file for the maintenance of business records relating to 3TG due diligence, including records of due diligence processes, findings and resulting decisions. Maxeon stores all supplier CMRTs and documents evidence of identified supplier 3TG sourcing risk. As contemplated by the OECD Guidance, Maxeon will maintain these records for at least five years. The Service Provider also is requested to maintain records in its possession for at least five years.

3TG Risk Management

Maxeon obtained information on 3TG sourcing risk from a variety of sources, including the Service Provider. Maxeon further used the CMRT responses to identify 3TG sourcing risk. Given Maxeon's position in the 3TG supply chain, it believes that this is the most efficient means for identifying 3TG sourcing risk.

Supply chain managers within Maxeon worked with the compliance team to identify 3TG sourcing concerns and determine risk mitigation efforts. The compliance team reported aggregated risk findings to and the contents of this Conflict Minerals Report are shared with Maxeon's executive management.

Maxeon determines on a case-by-case basis the appropriate risk mitigation strategy for any identified risks. Potential outcomes under Maxeon's risk mitigation strategy include continuing to work with the supplier while risks are addressed or reassessing the relationship with the supplier.

Utilization of Independent Third-Party Audits

To the extent that SORs are identified, Maxeon primarily utilizes information made available by the RMI concerning independent third-party audits and Conformant status. Maxeon also relies on audits performed by the LBMA and the RJC.

Report on Supply Chain Due Diligence

Maxeon files a Form SD and a Conflict Minerals Report with the Securities and Exchange Commission and makes these filings available on its investor relations website.

Findings Concerning Smelters and Refiners and Country of Origin Information

For 2024, Maxeon surveyed 35 Suppliers as part of its due diligence around 3TG and received CMRTs from 77% of those Suppliers in response to its outreach. The CMRT declarations received identified 351 SORs that processed or may have processed 3TG contained in Maxeon's in-scope products. Most Suppliers provided company-level declarations. Therefore, the list of processing facilities disclosed below may over-represent the number of 3TG processing facilities in Maxeon's supply chain.

In brief, as indicated in the table below:

- 351 SORs were identified by the Suppliers.
- 65% of SORs were listed as Conformant (as defined below).
- 2 SORs were listed as Active (as defined below).

In connection with Maxeon's RCOI or due diligence, as applicable, the Suppliers identified to Maxeon the facilities listed below as potentially having processed the necessary 3TG contained in Maxeon's in-scope products in 2024 (table information is as of April 2, 2025; see the notes following the table for additional information concerning the information presented in the table).

| Metal | Smelter Name | Country Name | Status |
|----------|--|--------------------------|-------------------------------|
| Tantalum | 5D Production OU | Estonia | Smelter Look-up List Tab Only |
| Gold | 8853 S.p.A. | Italy | Smelter Look-up List Tab Only |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | Japan | Conformant |
| Gold | ABC Refinery Pty Ltd. | Australia | Smelter Look-up List Tab Only |
| Gold | Abington Reldan Metals, LLC | United States of America | Conformant |
| Tungsten | ACL Metais Eireli | Brazil | Smelter Look-up List Tab Only |
| Gold | Advanced Chemical Company | United States of America | Conformant |
| Gold | African Gold Refinery | Uganda | Smelter Look-up List Tab Only |
| Gold | Agosi AG | Germany | Conformant |
| Gold | Aida Chemical Industries Co., Ltd. | Japan | Conformant |
| Gold | Al Etihad Gold Refinery DMCC | United Arab Emirates | Smelter Look-up List Tab Only |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | Brazil | Smelter Look-up List Tab Only |
| Gold | Albino Mountinho Lda. | Portugal | Smelter Look-up List Tab Only |
| Gold | Alexy Metals | United States of America | Smelter Look-up List Tab Only |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | Uzbekistan | Conformant |
| Tin | Alpha Assembly Solutions Inc | United States of America | Conformant |
| Tantalum | AMG Brasil | Brazil | Conformant |
| Tin | An Vinh Joint Stock Mineral Processing Company | Viet Nam | Smelter Look-up List Tab Only |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | Brazil | Conformant |
| Gold | Argor-Heraeus S.A. | Switzerland | Conformant |

| | | | |
|----------|---|--------------------------|-------------------------------|
| Tungsten | Artek LLC | Russian Federation | Smelter Look-up List Tab Only |
| Gold | ASAHI METALFINE, Inc. | Japan | Conformant |
| Gold | Asahi Refining Canada Ltd. | Canada | Conformant |
| Gold | Asahi Refining USA Inc. | United States of America | Conformant |
| Gold | Asaka Riken Co., Ltd. | Japan | Conformant |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | Viet Nam | Conformant |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | Turkey | Smelter Look-up List Tab Only |
| Gold | AU Traders and Refiners | South Africa | Smelter Look-up List Tab Only |
| Gold | Augmont Enterprises Private Limited | India | Smelter Look-up List Tab Only |
| Gold | Aurubis AG | Germany | Conformant |
| Tin | Aurubis Beerse | Belgium | Conformant |
| Tin | Aurubis Berango | Spain | Conformant |
| Gold | Bangalore Refinery | India | Smelter Look-up List Tab Only |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines | Conformant |
| Gold | Boliden Ronnskar | Sweden | Conformant |
| Gold | C. Hafner GmbH + Co. KG | Germany | Conformant |
| Gold | Caridad | Mexico | Smelter Look-up List Tab Only |
| Gold | CCR Refinery - Glencore Canada Corporation | Canada | Conformant |
| Gold | Cendres + Metaux S.A. | Switzerland | Smelter Look-up List Tab Only |
| Gold | CGR Metalloys Pvt Ltd. | India | Smelter Look-up List Tab Only |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | China | Conformant |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd. | China | Conformant |
| Gold | Chimet S.p.A. | Italy | Conformant |
| Tungsten | China Molybdenum Tungsten Co., Ltd. | China | Conformant |
| Tin | China Tin Group Co., Ltd. | China | Conformant |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | China | Conformant |
| Gold | Chugai Mining | Japan | Conformant |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd. | China | Smelter Look-up List Tab Only |

| | | | |
|----------|---|----------------------------------|-------------------------------|
| Gold | Coimpa Industrial LTDA | Brazil | Conformant |
| Tin | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda | Brazil | Conformant |
| Tin | CRM Synergies | Spain | Conformant |
| Tungsten | Cronimet Brasil Ltda | Brazil | Conformant |
| Tin | CV Ayi Jaya | Indonesia | Conformant |
| Tin | CV Venus Inti Perkasa | Indonesia | Conformant |
| Tantalum | D Block Metals, LLC | United States of America | Conformant |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | China | Smelter Look-up List Tab Only |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | Germany | Smelter Look-up List Tab Only |
| Gold | Dijllah Gold Refinery FZC | United Arab Emirates | Smelter Look-up List Tab Only |
| Tin | Dongguan CiEXPO Environmental Engineering Co., Ltd. | China | Smelter Look-up List Tab Only |
| Gold | Dongwu Gold Group | China | Smelter Look-up List Tab Only |
| Gold | Dowa | Japan | Conformant |
| Tin | Dowa | Japan | Conformant |
| Tin | DS Myanmar | Myanmar | Conformant |
| Gold | DSC (Do Sung Corporation) | Korea, Republic of | Conformant |
| Gold | Eco-System Recycling Co., Ltd. East Plant | Japan | Conformant |
| Gold | Eco-System Recycling Co., Ltd. North Plant | Japan | Conformant |
| Gold | Eco-System Recycling Co., Ltd. West Plant | Japan | Conformant |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Viet Nam | Smelter Look-up List Tab Only |
| Tin | EM Vinto | Bolivia (Plurinational State of) | Conformant |
| Gold | Emerald Jewel Industry India Limited (Unit 1) | India | Smelter Look-up List Tab Only |
| Gold | Emerald Jewel Industry India Limited (Unit 2) | India | Smelter Look-up List Tab Only |
| Gold | Emerald Jewel Industry India Limited (Unit 3) | India | Smelter Look-up List Tab Only |
| Gold | Emerald Jewel Industry India Limited (Unit 4) | India | Smelter Look-up List Tab Only |
| Gold | Emirates Gold DMCC | United Arab Emirates | Smelter Look-up List Tab Only |
| Tin | Estanho de Rondonia S.A. | Brazil | Conformant |

| | | | |
|----------|---|------------------------------|-------------------------------|
| Tantalum | F&X Electro-Materials Ltd. | China | Conformant |
| Tin | Fabrica Auricchio Industria e Comercio Ltda. | Brazil | Smelter Look-up List Tab Only |
| Tin | Fenix Metals | Poland | Conformant |
| Gold | Fidelity Printers and Refiners Ltd. | Zimbabwe | Smelter Look-up List Tab Only |
| Tantalum | FIR Metals & Resource Ltd. | China | Conformant |
| Gold | Fujairah Gold FZC | United Arab Emirates | Smelter Look-up List Tab Only |
| Tungsten | Fujian Xinlu Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | China | Conformant |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tin | Gejiu Kai Meng Industry and Trade LLC | China | Smelter Look-up List Tab Only |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | China | Conformant |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | China | Smelter Look-up List Tab Only |
| Gold | GG Refinery Ltd. | Tanzania, United Republic of | Conformant |
| Gold | GGC Gujrat Gold Centre Pvt. Ltd. | India | Smelter Look-up List Tab Only |
| Tantalum | Global Advanced Metals Aizu | Japan | Conformant |
| Tantalum | Global Advanced Metals Boyertown | United States of America | Conformant |
| Tungsten | Global Tungsten & Powders LLC | United States of America | Conformant |
| Gold | Gold by Gold Colombia | Colombia | Conformant |
| Gold | Gold Coast Refinery | Ghana | Smelter Look-up List Tab Only |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | China | Smelter Look-up List Tab Only |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | China | Conformant |
| Gold | Guangdong Jinding Gold Limited | China | Smelter Look-up List Tab Only |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd. | China | Conformant |

| | | | |
|----------|--|----------------------|-------------------------------|
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | China | Conformant |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tungsten | H.C. Starck Tungsten GmbH | Germany | Conformant |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tungsten | HANNAE FOR T Co., Ltd. | Korea, Republic of | Smelter Look-up List Tab Only |
| Gold | Heimerle + Meule GmbH | Germany | Conformant |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | China | Conformant |
| Gold | Heraeus Germany GmbH Co. KG | Germany | Conformant |
| Gold | Heraeus Metals Hong Kong Ltd. | China | Conformant |
| Tungsten | Hubei Green Tungsten Co., Ltd. | China | Conformant |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | China | Conformant |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | China | Conformant |
| Gold | Hunan Chenzhou Mining Co., Ltd. | China | Smelter Look-up List Tab Only |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tungsten | Hunan Jintai New Material Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tungsten | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch | China | Conformant |
| Gold | HwaSeong CJ CO., LTD. | Korea, Republic o | Smelter Look-up List Tab Only |
| Tungsten | Hydrometallurg, JSC | Russian Federation | Smelter Look-up List Tab Only |
| Gold | Impala Platinum - Base Metal Refinery (BMR) | South Africa | Conformant |
| Gold | Impala Platinum - Rustenburg Smelter | South Africa | Conformant |
| Gold | Industrial Refining Company | Belgium | Smelter Look-up List Tab Only |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China | Conformant |
| Gold | International Precious Metal Refiners | United Arab Emirates | Smelter Look-up List Tab Only |
| Gold | Ishifuku Metal Industry Co., Ltd. | Japan | Conformant |
| Gold | Istanbul Gold Refinery | Turkey | Conformant |
| Gold | Italpreziosi | Italy | Conformant |

| | | | |
|----------|---|--------------------------|-------------------------------|
| Gold | JALAN & Company | India | Smelter Look-up List Tab Only |
| Gold | Japan Mint | Japan | Conformant |
| Tungsten | Japan New Metals Co., Ltd. | Japan | Conformant |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | China | Conformant |
| Gold | Jiangxi Copper Co., Ltd. | China | Conformant |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tin | Jiangxi New Nanshan Technology Ltd. | China | Conformant |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China | Conformant |
| Tantalum | Jiangxi Tuohong New Raw Material | China | Conformant |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | China | Conformant |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | China | Conformant |
| Tantalum | Jiujiang Tanbre Co., Ltd. | China | Conformant |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | China | Conformant |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant" | Russian Federation | Smelter Look-up List Tab Only |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Russian Federation | Smelter Look-up List Tab Only |
| Gold | JSC Novosibirsk Refinery | Russian Federation | Smelter Look-up List Tab Only |
| Gold | JSC Uralelectromed | Russian Federation | Smelter Look-up List Tab Only |
| Gold | JX Advanced Metals Corporation | Japan | Conformant |
| Gold | K.A. Rasmussen | Norway | Smelter Look-up List Tab Only |
| Gold | Kaloti Precious Metals | United Arab Emirates | Smelter Look-up List Tab Only |
| Gold | Kazakhmys Smelting LLC | Kazakhstan | Smelter Look-up List Tab Only |
| Gold | Kazzinc | Kazakhstan | Conformant |
| Tantalum | KEMET de Mexico | Mexico | Conformant |
| Tungsten | Kennametal Fallon | United States of America | Conformant |

| | | | |
|----------|---|---------------------------|-------------------------------|
| Tungsten | Kennametal Huntsville | United States of America | Conformant |
| Gold | Kennecott Utah Copper LLC | United States of America | Conformant |
| Gold | KGHM Polska Miedz Spolka Akcyjna | Poland | Conformant |
| Gold | Kojima Chemicals Co., Ltd. | Japan | Conformant |
| Gold | Korea Zinc Co., Ltd. | Korea, Republic Of | Conformant |
| Gold | Kundan Care Products Ltd. | India | Smelter Look-up List Tab Only |
| Gold | Kyrgyzaltyn JSC | Kyrgyzstan | Smelter Look-up List Tab Only |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | Russian Federation | Smelter Look-up List Tab Only |
| Gold | L'azurde Company For Jewelry | Saudi Arabia | Smelter Look-up List Tab Only |
| Tungsten | Lianyou Metals Co., Ltd. | Taiwan, Province of China | Conformant |
| Tungsten | Lianyou Resources Co., Ltd. | Taiwan, Province of China | Conformant |
| Gold | Lingbao Gold Co., Ltd. | China | Smelter Look-up List Tab Only |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tungsten | LLC Vostok | Russian Federation | Smelter Look-up List Tab Only |
| Gold | L'Orfebre S.A. | Andorra | Smelter Look-up List Tab Only |
| Gold | LS MnM Inc. | Korea, Republic of | Conformant |
| Gold | LT Metal Ltd. | Korea, Republic of | Conformant |
| Tin | Luna Smelter, Ltd. | Rwanda | Conformant |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tin | Ma'anshan Weitai Tin Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | Brazil | Conformant |
| Tin | Malaysia Smelting Corporation (MSC) | Malaysia | Conformant |
| Tin | Malaysia Smelting Corporation Berhad (Port Klang) | Malaysia | Conformant |

| | | | |
|----------|---|-----------------------------------|-------------------------------|
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | China | Conformant |
| Gold | Marsam Metals | Brazil | Smelter Look-up List Tab Only |
| Tungsten | Masan High-Tech Materials | Viet Nam | Conformant |
| Gold | Materion | United States of America | Conformant |
| Tantalum | Materion Newton Inc. | United States of America | Conformant |
| Gold | Matsuda Sangyo Co., Ltd. | Japan | Conformant |
| Gold | MD Overseas | India | Smelter Look-up List Tab Only |
| Tin | Melt Metais e Ligas S.A. | Brazil | Active |
| Gold | Metal Concentrators SA (Pty) Ltd. | South Africa | Conformant |
| Tin | Metallic Resources, Inc. | United States of America | Conformant |
| Gold | Metallix Refining Inc. | United States of America | Smelter Look-up List Tab Only |
| Tantalum | Metallurgical Products India Pvt., Ltd. | India | Conformant |
| Gold | Metalor Technologies (Hong Kong) Ltd. | China | Conformant |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | Singapore | Conformant |
| Gold | Metalor Technologies (Suzhou) Ltd. | China | Conformant |
| Gold | Metalor Technologies S.A. | Switzerland | Conformant |
| Gold | Metalor USA Refining Corporation | United States of America | Conformant |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | Mexico | Conformant |
| Tin | Mineracao Taboca S.A. | Brazil | Conformant |
| Tantalum | Mineracao Taboca S.A. | Brazil | Conformant |
| Tin | Mining Minerals Resources SARL | Congo, Democratic Republic of The | Conformant |
| Tin | Minsur | Peru | Conformant |
| Gold | Mitsubishi Materials Corporation | Japan | Conformant |
| Tin | Mitsubishi Materials Corporation | Japan | Conformant |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | Japan | Conformant |
| Gold | Mitsui Mining and Smelting Co., Ltd. | Japan | Conformant |
| Gold | MKS PAMP SA | Switzerland | Conformant |
| Gold | MMTC-PAMP India Pvt., Ltd. | India | Conformant |
| Gold | Modeltech Sdn Bhd | Malaysia | Smelter Look-up List Tab Only |

| | | | |
|----------|---|----------------------------------|-------------------------------|
| Tin | Modeltech Sdn Bhd | Malaysia | Smelter Look-up List Tab Only |
| Tungsten | Moliren Ltd. | Russian Federation | Smelter Look-up List Tab Only |
| Gold | Morris and Watson | New Zealand | Smelter Look-up List Tab Only |
| Gold | Moscow Special Alloys Processing Plant | Russian Federation | Smelter Look-up List Tab Only |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | Turkey | Conformant |
| Gold | Navoi Mining and Metallurgical Combinat | Uzbekistan | Conformant |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Viet Nam | Smelter Look-up List Tab Only |
| Gold | NH Recytech Company | Korea, Republic of | Conformant |
| Tungsten | Niagara Refining LLC | United States of America | Conformant |
| Gold | Nihon Material Co., Ltd. | Japan | Conformant |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | China | Conformant |
| Gold | NOBLE METAL SERVICES | United States of America | Smelter Look-up List Tab Only |
| Tin | Novosibirsk Tin Combine | Russian Federation | Smelter Look-up List Tab Only |
| Tantalum | NPM Silmet AS | Estonia | Conformant |
| Tungsten | NPP Tyazhmetprom LLC | Russian Federation | Smelter Look-up List Tab Only |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | Thailand | Conformant |
| Tin | O.M. Manufacturing Philippines, Inc. | Philippines | Conformant |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Austria | Active |
| Gold | Ohura Precious Metal Industry Co., Ltd. | Japan | Conformant |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Russian Federation | Smelter Look-up List Tab Only |
| Tungsten | OOO "Technolom" 1 | Russian Federation | Smelter Look-up List Tab Only |
| Tungsten | OOO "Technolom" 2 | Russian Federation | Smelter Look-up List Tab Only |
| Tin | Operaciones Metalurgicas S.A. | Bolivia (Plurinational State of) | Conformant |
| Gold | Pease & Curren | United States of America | Smelter Look-up List Tab Only |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | China | Smelter Look-up List Tab Only |

| | | | |
|----------|---|--------------------------|-------------------------------|
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | Philippines | Conformant |
| Gold | Planta Recuperadora de Metales SpA | Chile | Conformant |
| Tin | Pongpipat Company Limited | Myanmar | Smelter Look-up List Tab Only |
| Tantalum | PowerX Ltd. | Rwanda | Conformant |
| Tin | Precious Minerals and Smelting Limited | India | Smelter Look-up List Tab Only |
| Gold | Prioksky Plant of Non-Ferrous Metals | Russian Federation | Smelter Look-up List Tab Only |
| Gold | PT Aneka Tambang (Persero) Tbk | Indonesia | Conformant |
| Tin | PT Aries Kencana Sejahtera | Indonesia | Conformant |
| Tin | PT Artha Cipta Langgeng | Indonesia | Conformant |
| Tin | PT ATD Makmur Mandiri Jaya | Indonesia | Conformant |
| Tin | PT Babel Inti Perkasa | Indonesia | Conformant |
| Tin | PT Babel Surya Alam Lestari | Indonesia | Conformant |
| Tin | PT Bangka Prima Tin | Indonesia | Conformant |
| Tin | PT Bangka Serumpun | Indonesia | Conformant |
| Tin | PT Bangka Tin Industry | Indonesia | Conformant |
| Tin | PT Belitung Industri Sejahtera | Indonesia | Conformant |
| Tin | PT Bukit Timah | Indonesia | Conformant |
| Tin | PT Cipta Persada Mulia | Indonesia | Conformant |
| Tin | PT Menara Cipta Mulia | Indonesia | Conformant |
| Tin | PT Mitra Stania Prima | Indonesia | Conformant |
| Tin | PT Mitra Sukses Globalindo | Indonesia | Conformant |
| Tin | PT Panca Mega Persada | Indonesia | Smelter Look-up List Tab Only |
| Tin | PT Premium Tin Indonesia | Indonesia | Conformant |
| Tin | PT Prima Timah Utama | Indonesia | Conformant |
| Tin | PT Putera Sarana Shakti (PT PSS) | Indonesia | Conformant |
| Tin | PT Rajawali Rimba Perkasa | Indonesia | Conformant |
| Tin | PT Rajehan Ariq | Indonesia | Conformant |
| Tin | PT Refined Bangka Tin | Indonesia | Conformant |
| Tin | PT Sariwiguna Binasentosa | Indonesia | Conformant |
| Tin | PT Stanindo Inti Perkasa | Indonesia | Conformant |
| Tin | PT Sukses Inti Makmur | Indonesia | Conformant |
| Tin | PT Timah Nusantara | Indonesia | Conformant |
| Tin | PT Timah Tbk Kundur | Indonesia | Conformant |
| Tin | PT Timah Tbk Mentok | Indonesia | Conformant |
| Tin | PT Tinindo Inter Nusa | Indonesia | Conformant |
| Tin | PT Tirus Putra Mandiri | Indonesia | Smelter Look-up List Tab Only |
| Tin | PT Tommy Utama | Indonesia | Conformant |
| Gold | PX Precinox S.A. | Switzerland | Conformant |
| Gold | QG Refining, LLC | United States of America | Smelter Look-up List Tab Only |

| | | | |
|----------|---|---------------------------|-------------------------------|
| Tantalum | QuantumClean | United States of America | Conformant |
| Gold | Rand Refinery (Pty) Ltd. | South Africa | Conformant |
| Gold | Refinery of Seemine Gold Co., Ltd. | China | Smelter Look-up List Tab Only |
| Gold | REMONDIS PMR B.V. | Netherlands | Conformant |
| Tin | Resind Industria e Comercio Ltda. | Brazil | Conformant |
| Tantalum | Resind Industria e Comercio Ltda. | Brazil | Conformant |
| Tantalum | RFH Yancheng Jinye New Material Technology Co., Ltd. | China | Conformant |
| Gold | Royal Canadian Mint | Canada | Conformant |
| Tin | Rui Da Hung | Taiwan, Province of China | Conformant |
| Gold | SAAMP | France | Smelter Look-up List Tab Only |
| Gold | Sabin Metal Corp. | United States of America | Smelter Look-up List Tab Only |
| Gold | Safimet S.p.A | Italy | Smelter Look-up List Tab Only |
| Gold | SAFINA A.S. | Czechia | Conformant |
| Gold | Sai Refinery | India | Smelter Look-up List Tab Only |
| Gold | Samduck Precious Metals | Korea, Republic of | Smelter Look-up List Tab Only |
| Gold | SAMWON METALS Corp. | Korea, Republic of | Smelter Look-up List Tab Only |
| Gold | SEMPSA Joyeria Plateria S.A. | Spain | Conformant |
| Gold | Shandong Gold Smelting Co., Ltd. | China | Conformant |
| Gold | Shandong Humon Smelting Co., Ltd. | China | Smelter Look-up List Tab Only |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | China | Smelter Look-up List Tab Only |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | China | Conformant |
| Gold | Shenzhen CuiLu Gold Co., Ltd. | China | Smelter Look-up List Tab Only |
| Gold | Shenzhen Zhonghenglong Real Industry Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tungsten | Shinwon Tungsten (Fujian Shanghang) Co., Ltd. | China | Conformant |
| Gold | Shirpur Gold Refinery Ltd. | India | Smelter Look-up List Tab Only |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | China | Conformant |
| Gold | Singway Technology Co., Ltd. | Taiwan, Province of China | Smelter Look-up List Tab Only |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | Russian Federation | Smelter Look-up List Tab Only |
| Gold | Solar Applied Materials Technology Corp. | Taiwan, Province of China | Conformant |

| | | | |
|----------|---|---------------------------|-------------------------------|
| Tantalum | Solikamsk Magnesium Works OAO | Russian Federation | Smelter Look-up List Tab Only |
| Gold | Sovereign Metals | India | Smelter Look-up List Tab Only |
| Gold | State Research Institute Center for Physical Sciences and Technology | Lithuania | Smelter Look-up List Tab Only |
| Gold | Sudan Gold Refinery | Sudan | Smelter Look-up List Tab Only |
| Gold | Sumitomo Metal Mining Co., Ltd. | Japan | Conformant |
| Gold | SungEel HiMetal Co., Ltd. | Korea, Republic of | Conformant |
| Gold | Super Dragon Technology Co., Ltd. | Taiwan, Province of China | Smelter Look-up List Tab Only |
| Tin | Super Ligas | Brazil | Conformant |
| Gold | T.C.A S.p.A | Italy | Conformant |
| Tin | Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD. | Japan | Conformant |
| Tantalum | Taki Chemical Co., Ltd. | Japan | Conformant |
| Gold | Tanaka Kikinzoku Kogyo K.K. | Japan | Conformant |
| Tantalum | TANIOBIS Co., Ltd. | Thailand | Conformant |
| Tantalum | TANIOBIS GmbH | Germany | Conformant |
| Tantalum | TANIOBIS Japan Co., Ltd. | Japan | Conformant |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG | Germany | Conformant |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG | Germany | Conformant |
| Tantalum | Telex Metals | United States of America | Conformant |
| Tin | Thaisarco | Thailand | Conformant |
| Tin | Tin Smelting Branch of Yunnan Tin Co., Ltd. | China | Conformant |
| Tin | Tin Technology & Refining | United States of America | Conformant |
| Gold | Tokuriki Honten Co., Ltd. | Japan | Conformant |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | China | Smelter Look-up List Tab Only |
| Gold | TOO Tau-Ken-Altyn | Kazakhstan | Conformant |
| Gold | Torecom | Korea, Republic Of | Smelter Look-up List Tab Only |
| Tungsten | Tungsten Vietnam Joint Stock Company | Viet Nam | Conformant |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | Viet Nam | Smelter Look-up List Tab Only |

| | | | |
|----------|---|--------------------------|-------------------------------|
| Tantalum | Ulba Metallurgical Plant JSC | Kazakhstan | Conformant |
| Gold | Umicore Precious Metals Thailand | Thailand | Smelter Look-up List Tab Only |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | Belgium | Conformant |
| Tungsten | Unecha Refractory Metals Plant | Russian Federation | Smelter Look-up List Tab Only |
| Gold | United Precious Metal Refining, Inc. | United States of America | Conformant |
| Gold | Valcambi S.A. | Switzerland | Conformant |
| Tin | VQB Mineral and Trading Group JSC | Viet Nam | Smelter Look-up List Tab Only |
| Gold | WEEEREFINING | France | Conformant |
| Gold | Western Australian Mint (T/a The Perth Mint) | Australia | Conformant |
| Tin | White Solder Metalurgia e Mineracao Ltda. | Brazil | Conformant |
| Gold | WIELAND Edelmetalle GmbH | Germany | Conformant |
| Tungsten | Wolfram Bergbau und Hutten AG | Austria | Conformant |
| Tin | Woodcross Smelting Company Limited | Uganda | Conformant |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | China | Conformant |
| Tungsten | Xiamen Tungsten Co., Ltd. | China | Conformant |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED | China | Conformant |
| Tantalum | XinXing Haorong Electronic Material Co., Ltd. | China | Conformant |
| Gold | Yamakin Co., Ltd. | Japan | Conformant |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | China | Conformant |
| Gold | Yokohama Metal Co., Ltd. | Japan | Conformant |
| Tungsten | YUDU ANSHENG TUNGSTEN CO., LTD. | China | Smelter Look-up List Tab Only |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | China | Conformant |
| Gold | Yunnan Copper Industry Co., Ltd. | China | Smelter Look-up List Tab Only |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | China | Conformant |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | China | Conformant |
| Gold | Zijin Mining Group Gold Smelting Co. Ltd. | China | Conformant |

- a. Conformant” means that a SOR has successfully completed an assessment against the applicable Responsible Minerals Assurance Process (“RMAP”) standard or an equivalent cross-recognized assessment. Included SORs were not necessarily Conformant for all or part of 2024 and may not continue to be Conformant for any future period.
- b. “Active” means that the SOR is currently engaged in the RMAP but a conformance determination has yet to be made.
- c. “Smelter Look-up List Tab Only” means that a SOR is listed on the Smelter Look-up list tab of the CMRT, but is not listed as “Conformant” or “Active.” The RMI website notes that, due to the eligibility criteria for an RMAP assessment, SORs are sometimes removed from the Conformant list because they are no longer operational and not because they are non-conformant to the standard.
- d. SOR status reflected in the table is based solely on information made publicly available by the RMI, without independent verification by Maxeon.
- e. Country location is the location of the SOR and is based solely on information made publicly available by the RMI, without independent verification by Maxeon.

Country of Origin Information

Maxeon has endeavored to determine the mine or location of origin of the necessary 3TG contained in its in-scope products by requiring that the Suppliers provide it with completed CMRTs and through the other measures described in this Conflict Minerals Report. Where a SOR has been identified that is not Conformant, Maxeon or the Service Provider also has reviewed public information, to the extent available, to try to determine the mine or location of origin of the 3TG processed by the SOR.

According to the Service Provider, the countries of origin of the 3TG processed by SORs listed above may have included countries listed below (as well as possibly other countries).

| | | | |
|------------------------------------|--------------------|------------------|--------------------------|
| Angola* | Ecuador | Madagascar | Singapore |
| Argentina | Egypt | Malaysia | Slovakia |
| Armenia | Estonia | Mali | South Africa |
| Australia | Ethiopia | Mexico | Spain |
| Austria | Finland | Mongolia | Suriname |
| Belgium | France | Morocco | Sweden |
| Belgium | Germany | Mozambique | Switzerland |
| Bermuda | Ghana | Myanmar | Tajikistan |
| Bolivia | Guinea | Namibia | Tanzania* |
| Brazil | Guyana | Netherlands | Thailand |
| Burundi* | Hungary | New Zealand | Turkey |
| Cambodia | India | Niger | Uganda* |
| Canada | Indonesia | Nigeria | United Arab Emirates |
| Central African Republic* | Ireland | Papua New Guinea | United Kingdom |
| Chile | Israel | Peru | United States of America |
| China | Japan | Philippines | Uzbekistan |
| Colombia | Kazakhstan | Poland | Vietnam |
| Congo, Democratic Republic of the* | Kenya | Portugal | Zambia* |
| Congo, Republic of the* | Luxembourg | Sierra Leone | |
| Cote D'Ivoire | Korea, Republic of | Russia | Zimbabwe |
| Czechia | Kyrgyzstan | Rwanda* | |
| Djibouti | Laos | Saudi Arabia | |

* Represents a Covered Country.

The 3TG processed by the identified SORs also may have originated in whole or in part from recycled or scrap sources.

Due Diligence Improvement Measures

Maxeon intends to further improve its due diligence measures for 2025 in order to mitigate the risk that the necessary 3TG in its in-scope products benefit armed groups by taking the following steps, among others:

- a. Continue to alert suppliers when Maxeon obtains information that a 3TG SOR is believed to be irresponsibly sourcing 3TG
- b. Request that suppliers who have identified non-Conformant or high-risk SORs require their upstream suppliers to find alternative sources of 3TG or require certification of the SORs in their supply chains.
- c. Review our 3TG compliance program for potential additional enhancements, in particular ways to enhance supplier engagement.

The foregoing steps are in addition to the other steps that Maxeon took for 2024 described earlier in this Conflict Minerals Report.