



The solar energy industry delivers sustainability solutions to customers by producing energy with low greenhouse gas impacts, improving energy security, and creating jobs and economic development. These considerations, however, are only a small part of the industry's role in sustainability. More broadly, the solar energy industry has a responsibility to mitigate and manage its full range of social and environmental impacts, which include respecting the human rights of workers, ensuring that the rights of communities and other stakeholders are respected, and making business operations safe and environmentally responsible.

Maxeon expects its suppliers to be aware of its Human Rights Statement and respect and follow a similar policy, we also ask suppliers to continuously improve their observance of human rights, recognizing new interpretations and standards that affect their work. Maxeon reserves the right to carry out further due diligence including monitoring and auditing suppliers to ensure compliance and reduce risk.

1. LABOR PRACTICES

Maxeon expects its suppliers to operate consistent with, and draw upon SA8000 and internationally recognized standards, such as the [Universal Declaration of Human Rights](#) and the [United Nations Global Compact](#), and [Maxeon's Statement on Human Rights](#) to ensure human rights are protected throughout the supply chain. Suppliers should track and make available to relevant stakeholders information on their human rights performance.

1.1. Freely Chosen Employment

Forced, bonded or indentured labor or involuntary prison labor should not be used. All work will be voluntary, and workers should be free to leave upon reasonable notice. Workers should not be required to hand over government-issued identification, passports or work permits as a condition of employment.

1.2. Child Labor Avoidance

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 should not perform work that is likely to jeopardize the health or safety of young workers.

1.3. Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers should be allowed at least one day off per seven-day week.

1.4. Wages and Benefits

Compensation paid to workers should comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers should be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure should not be permitted. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation.

1.5. Humane Treatment

Disciplinary policies and procedures should be clearly defined and communicated to workers. There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers: nor is there to be the threat of any such treatment.

1.6. Non-Discrimination

The workforce should be free of harassment and unlawful discrimination. Companies should not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

1.7. Freedom of Association

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers should be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

2. HEALTH AND SAFETY

Maxeon recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. We also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace. Suppliers are expected to be aware of and operate consistently with Maxeon's Environment, Health and Safety Policy.

2.1. Occupational Safety

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Workers should not be disciplined for raising safety concerns.

Suppliers must comply with electrical design and installation standards (e.g. the IEC/NEC or equivalent) to ensure electrical safety, including when systems are installed in ground-mount (free-field) or rooftop environments.

Suppliers must comply with all applicable fall prevention requirements including, as relevant, fall prevention safety plans, training, monitoring, mitigation activities, corrective action plans as well as any additional activities to eliminate fall risk.

2.2. Emergency Preparedness

Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

2.3. Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and e) facilitate return of workers to work.

2.4. Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures.

When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

2.5. Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

2.6. Machine Safeguarding

Production and other machinery are to be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

2.7. Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or a labor agent are to be maintained clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, and adequate heat and ventilation and reasonable personal space along with reasonable entry and exit privileges.

3. ENERGY AND ENVIRONMENT

Maxeon recognizes that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

Suppliers should actively work to reduce the consumption of natural resources including raw materials, water, and energy taking into consideration the entire product life-cycle from raw material sourcing through end-of-life. Scrap materials and end of life products should be reused or recycled through public or private programs. Key environmental impacts of manufacturing processes, product technology or key business operations should be identified and appropriate controls should be used to minimize these impacts including tracking water use, energy use, and related greenhouse gas emissions, while maximizing energy efficiency throughout business operations. Suppliers should make available to relevant stakeholders information on all of these processes and activities.

3.1. Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

3.2. Pollution Prevention and Resource Reduction

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

3.3. Hazardous Substances

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

3.4. Wastewater and Solid Waste

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

3.5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

3.6. Product Content Restrictions

Participants are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

3.7. Sustainability Data and Supporting Documentation

We may periodically request support for our sustainability and environmental data reporting such as but not limited to materiality assessment stakeholder interviews, information request consolidation, and provision of supporting documentation as required. We expect suppliers to reasonably cooperate by providing timely and accurate responses to any requests received.

4. MANAGEMENT SYSTEM

Suppliers are expected to adopt or establish a management system whose scope is related to the content of these Supplier Sustainability Guidelines. The management system shall be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to the supplier's operations and products; (b) conformance with these Guidelines; and (c) identification and mitigation of operational risks related to these Guidelines. It should also facilitate continual improvement.

The management system should contain the following elements:

4.1. Company Commitment

Corporate social and environmental responsibility policy statements affirming commitment to compliance and continual improvement, endorsed by executive management.

4.2. Management Accountability and Responsibility

Company representative[s] responsible for ensuring implementation of the management systems and associated programs are identified. Senior management reviews the status of the management system on a regular basis.

4.3. Legal and Customer Requirements

Identification, monitoring and understanding of applicable laws, regulations and customer requirements.

4.4. Risk Assessment and Risk Management

Process to identify the environmental, health and safety and labor practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance. Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.

4.5. Improvement Objectives

Written performance objectives, targets and implementation plans to improve the Supplier's social and environmental performance, including a periodic assessment of Supplier's performance in achieving those objectives.

4.6. Training

Programs for training managers and workers to implement Supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

4.7. Communication

Process for communicating clear and accurate information about Supplier's policies, practices, expectations and performance to workers, suppliers and customers.

4.8. Worker Feedback and Participation

Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by these Guidelines and to foster continuous improvement.

4.9. Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Guidelines and customer contractual requirements related to social and environmental responsibility.

4.10. Corrective Action Process

Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

4.11. Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

5. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Supplier's and their agents are to operate consistently with Maxeon's Code of Ethics and Business Conduct ("Code of Conduct"), available [here](#) and uphold the highest standards of ethics including:

5.1. Business Integrity

The highest standards of integrity are to be expected in all business interactions. Suppliers should prohibit any and all forms of corruption, extortion and embezzlement. Monitoring and enforcement procedures should be implemented to ensure conformance.



5.2. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

5.3. Disclosure of Information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

5.4. Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

5.5. Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.

5.6. Protection of Identity of Whistleblowers

Programs that ensure the confidentiality and protection of supplier and employee whistleblower¹ are to be maintained.

5.7. Reporting Misconduct

If a supplier believes that anyone acting on behalf of Maxeon is engaged in illegal or unethical conduct, the supplier should report this to Maxeon. A good-faith report of suspected misconduct will not adversely impact the supplier.

6. ADDITIONAL POLICY STATEMENTS

Please refer to these Global Human Rights Policy and Conflict Minerals Policy at [here](#)

¹ Whistleblower is defined as any person who makes a good faith disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.



Supplier Sustainability Guidelines Acknowledgement

This acknowledgement and agreement is intended to supplement any and all contracts and agreements between Maxeon and Supplier for the supply of goods or services by Supplier to Maxeon Solar Technologies and its affiliates. Supplier confirms that it has read the Maxeon Supplier Sustainability Guidelines and agrees with its statement of requirements.

Supplier Executive
Signature
Position
Date