
**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.)

8 Marina Boulevard #05-02
Marina Bay Financial Centre
018981, Singapore
(Address of principal executive offices, with zip code)

Lindsey Wiedmann
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 to indicate the rule pursuant to which this form is being filed, 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, 2020

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://www.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 – Exhibits

Item 2.01 Exhibits

| Exhibit No. | Description |
|-------------|---|
| 1.01 | Conflict Minerals Report for the calendar year ended December 31, 2020. |

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 undersigned, thereunto duly authorized.

MAXEON SOLAR TECHNOLOGIES, LTD.
(Registrant)

May 28, 2021

By: /s/ Lindsey Wiedmann
Lindsey Wiedmann
Chief Legal Officer

EXHIBITS

| <u>Exhibit</u> | <u>Title</u> |
|-----------------------|--|
| 1.01 | Conflict Minerals Report for the calendar year ended December 31, 2020 |

Conflict Minerals Report

Maxeon Solar Technologies, Ltd. has included this Conflict Minerals Report as an exhibit to its Form SD for 2020 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 May 28, 2021.

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>.

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 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 global manufacturers and marketers of premium solar power technology. We have developed and maintained this leadership through decades of technological innovation and investment, in addition to the development of sales and distribution channels across six continents. Maxeon’s products include solar cells and panels, which we manufacture. Many of the products that Maxeon manufactures contains 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 January 3, 2021. The information contained in the Form 20-F is not incorporated by reference into this Conflict Minerals Report or Maxeon’s Form SD for 2020 and should not be considered part of this Conflict Minerals Report or the Form SD.

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 smelters or refiners 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 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 2020, Maxeon surveyed 50 suppliers as part of its RCOI.

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 2020.

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://www.maxeon.com/static-files/7189df75-ef32-4397-bda9-06e6a11d50fe>.

In an effort to increase supplier awareness about Conflict Minerals and related regulatory requirements, provide answers to frequently asked questions concerning 3TG mineral tracing, and ultimately 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 2020, Maxeon carried out due diligence on relevant components and parts in the products it manufactured. Maxeon's outreach included 50 suppliers (the "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.

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 smelter or refiner 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 smelter or refiner to gain more information about its sourcing practices, including countries of origin and transfer, and due diligence procedures. In addition, for smelters and refiners that are not Conformant, the Service Provider searched public information to attempt to determine the smelter's or refiner'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. Under Maxeon's risk management framework, to the extent that risks require mitigation, Maxeon monitors and tracks the performance of the risk mitigation efforts and reports these efforts to appropriate senior oversight personnel.

Utilization of Independent Third-Party Audits

To the extent that smelters or refiners 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 2020, Maxeon surveyed 50 Suppliers as part of its due diligence around 3TG and received CMRTs from 66% of those Suppliers in response to its outreach. The CMRT declarations received identified 326 smelters and refiners that processed or may have processed 3TG contained in Maxeon's in-scope products. A significant number of 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:

- 326 smelters and refiners were identified by the Suppliers.
- 246 smelters and refiners, or 75%, were listed as Conformant by the RMI.
- 13 smelters or refiners, or 4%, were listed as Active.
- 67 smelters or refiners, or 21%, were listed on the CMRT Smelter Look-up tab only.

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 2020 (table information is as of May 26, 2021; see the notes following the table for additional information concerning the information presented in the table).

| Metal | Smelter Name | Country Name | Status |
|-------|---|--------------------------|-----------------------------|
| Gold | 8853 S.p.A. | Italy | Conformant |
| Gold | Abington Reldan Metals, LLC | United States of America | On Smelter Look-Up Tab Only |
| Gold | Advanced Chemical Company | United States of America | Conformant |
| Gold | African Gold Refinery | Uganda | On Smelter Look-Up Tab Only |
| Gold | Aida Chemical Industries Co., Ltd. | Japan | Conformant |
| Gold | Al Etihad Gold Refinery DMCC | United Arab Emirates | Conformant |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | Germany | Conformant |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | Uzbekistan | Conformant |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | Brazil | Conformant |
| Gold | Argor-Heraeus S.A. | Switzerland | Conformant |
| Gold | Asahi Pretec Corp. | 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 |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | Turkey | On Smelter Look-Up Tab Only |
| Gold | AU Traders and Refiners | South Africa | Conformant |
| Gold | Augmont Enterprises Private Limited | India | Active |
| Gold | Aurubis AG | Germany | Conformant |
| Gold | Bangalore Refinery | India | Conformant |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines | Conformant |
| Gold | Boliden AB | Sweden | Conformant |
| Gold | C. Hafner GmbH + Co. KG | Germany | Conformant |
| Gold | C.I Metales Procesados Industriales SAS | Colombia | Active |
| Gold | Caridad | Mexico | On Smelter Look-Up Tab Only |
| Gold | CCR Refinery - Glencore Canada Corporation | Canada | Conformant |
| Gold | Cendres + Metaux S.A. | Switzerland | Conformant |

| | | | |
|------|---|--------------------------|-----------------------------|
| Gold | CGR Metalloys Pvt Ltd. | India | On Smelter Look-Up Tab Only |
| Gold | Chimet S.p.A. | Italy | Conformant |
| Gold | Chugai Mining | Japan | Conformant |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | China | Conformant |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | Germany | On Smelter Look-Up Tab Only |
| Gold | Dijllah Gold Refinery FZC | United Arab Emirates | On Smelter Look-Up Tab Only |
| Gold | DODUCO Contacts and Refining GmbH | Germany | Conformant |
| Gold | Dowa | Japan | Conformant |
| Gold | DS PRETECH Co., Ltd. | Korea | Conformant |
| Gold | DSC (Do Sung Corporation) | Korea | 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 |
| Gold | Emirates Gold DMCC | United Arab Emirates | Conformant |
| Gold | Fidelity Printers and Refiners Ltd. | Zimbabwe | On Smelter Look-Up Tab Only |
| Gold | Fujairah Gold FZC | United Arab Emirates | On Smelter Look-Up Tab Only |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd. | India | On Smelter Look-Up Tab Only |
| Gold | Geib Refining Corporation | United States of America | Conformant |
| Gold | Gold Coast Refinery | Ghana | On Smelter Look-Up Tab Only |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | China | Conformant |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | China | Conformant |
| Gold | Guangdong Jinding Gold Limited | China | On Smelter Look-Up Tab Only |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | Heimerle + Meule GmbH | Germany | Conformant |
| Gold | Heraeus Metals Hong Kong Ltd. | China | Conformant |
| Gold | Heraeus Precious Metals GmbH & Co. KG | Germany | On Smelter Look-Up Tab Only |
| Gold | Hunan Chenzhou Mining Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | HwaSeong CJ CO., LTD. | Korea | On Smelter Look-Up Tab Only |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China | Conformant |
| Gold | International Precious Metal Refiners | United Arab Emirates | Active |
| Gold | Ishifuku Metal Industry Co., Ltd. | Japan | Conformant |
| Gold | Istanbul Gold Refinery | Turkey | Conformant |
| Gold | Italpreziosi | Italy | Conformant |
| Gold | JALAN & Company | India | On Smelter Look-Up Tab Only |
| Gold | Japan Mint | Japan | Conformant |
| Gold | Jiangxi Copper Co., Ltd. | China | Conformant |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Russia | On Smelter Look-Up Tab Only |
| Gold | JSC Uralelectromed | Russia | Conformant |
| Gold | JX Nippon Mining & Metals Co., Ltd. | Japan | Conformant |

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|------|---|--------------------------|-----------------------------|
| Gold | Kaloti Precious Metals | United Arab Emirates | On Smelter Look-Up Tab Only |
| Gold | Kazakhmys Smelting LLC | Kazakhstan | On Smelter Look-Up Tab Only |
| Gold | Kazzinc | Kazakhstan | 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 | Conformant |
| Gold | Kundan Care Products Ltd. | India | On Smelter Look-Up Tab Only |
| Gold | Kyrgyzaltyn JSC | Kyrgyzstan | Conformant |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | Russia | On Smelter Look-Up Tab Only |
| Gold | L'azurde Company For Jewelry | Saudi Arabia | On Smelter Look-Up Tab Only |
| Gold | Lingbao Gold Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | L'Orfebre S.A. | Andorra | Conformant |
| Gold | LS-NIKKO Copper Inc. | Korea | Conformant |
| Gold | LT Metal Ltd. | Korea | Conformant |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | Marsam Metals | Brazil | Conformant |
| Gold | Materion | United States of America | Conformant |
| Gold | Matsuda Sangyo Co., Ltd. | Japan | 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 |
| Gold | Mitsubishi Materials Corporation | Japan | Conformant |
| Gold | Mitsui Mining and Smelting Co., Ltd. | Japan | Conformant |
| Gold | MMTC-PAMP India Pvt., Ltd. | India | Conformant |
| Gold | Modeltech Sdn Bhd | Malaysia | On Smelter Look-Up Tab Only |
| Gold | Morris and Watson | New Zealand | On Smelter Look-Up Tab Only |
| Gold | Moscow Special Alloys Processing Plant | Russia | Conformant |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | Turkey | Conformant |
| Gold | Navoi Mining and Metallurgical Combinat | Uzbekistan | Conformant |
| Gold | NH Recytech Company | Korea | On Smelter Look-Up Tab Only |
| Gold | Nihon Material Co., Ltd. | Japan | Conformant |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Austria | Conformant |
| Gold | Ohura Precious Metal Industry Co., Ltd. | Japan | Conformant |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Russia | Conformant |
| Gold | OJSC Novosibirsk Refinery | Russia | Conformant |
| Gold | PAMP S.A. | Switzerland | Conformant |
| Gold | Pease & Curren | United States of America | On Smelter Look-Up Tab Only |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | China | On Smelter Look-Up Tab Only |

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|------|--|--------------------------|-----------------------------|
| Gold | Planta Recuperadora de Metales SpA | Chile | Conformant |
| Gold | Prioksky Plant of Non-Ferrous Metals | Russia | Conformant |
| Gold | PT Aneka Tambang (Persero) Tbk | Indonesia | Conformant |
| Gold | PX Precinox S.A. | Switzerland | Conformant |
| Gold | QG Refining, LLC | United States of America | On Smelter Look-Up Tab Only |
| Gold | Rand Refinery (Pty) Ltd. | South Africa | Conformant |
| Gold | Refinery of Seemine Gold Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | REMONDIS PMR B.V. | Netherlands | Conformant |
| Gold | Royal Canadian Mint | Canada | Conformant |
| Gold | SAAMP | France | Conformant |
| Gold | Sabin Metal Corp. | United States of America | On Smelter Look-Up Tab Only |
| Gold | Safimet S.p.A | Italy | Conformant |
| Gold | SAFINA A.S. | Czechia | Conformant |
| Gold | Sai Refinery | India | On Smelter Look-Up Tab Only |
| Gold | Samduck Precious Metals | Korea | Conformant |
| Gold | SAMWON METALS Corp. | Korea | On Smelter Look-Up Tab Only |
| Gold | SAXONIA Edelmetalle GmbH | Germany | Conformant |
| Gold | SEMPSA Joyeria Plateria S.A. | Spain | Conformant |
| Gold | Shandong Humon Smelting Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | China | Conformant |
| Gold | Shenzhen Zhonghenglong Real Industry Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | Shirpur Gold Refinery Ltd. | India | On Smelter Look-Up Tab Only |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | China | Conformant |
| Gold | Singway Technology Co., Ltd. | Taiwan | Conformant |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | Russia | Conformant |
| Gold | Solar Applied Materials Technology Corp. | Taiwan | Conformant |
| Gold | Sovereign Metals | India | On Smelter Look-Up Tab Only |
| Gold | State Research Institute Center for Physical Sciences and Technology | Lithuania | On Smelter Look-Up Tab Only |
| Gold | Sudan Gold Refinery | Sudan | On Smelter Look-Up Tab Only |
| Gold | Sumitomo Metal Mining Co., Ltd. | Japan | Conformant |
| Gold | SungEel HiMetal Co., Ltd. | Korea | Conformant |
| Gold | T.C.A S.p.A | Italy | Conformant |
| Gold | Tanaka Kikinzoku Kogyo K.K. | Japan | Conformant |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | China | Conformant |
| Gold | Tokuriki Honten Co., Ltd. | Japan | Conformant |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | Tony Goetz NV | Belgium | On Smelter Look-Up Tab Only |
| Gold | TOO Tau-Ken-Altyn | Kazakhstan | Conformant |
| Gold | Torecom | Korea | Conformant |
| Gold | Umicore Brasil Ltda. | Brazil | On Smelter Look-Up Tab Only |
| Gold | Umicore Precious Metals Thailand | Thailand | Conformant |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | Belgium | Conformant |

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|----------|---|--------------------------|-----------------------------|
| Gold | United Precious Metal Refining, Inc. | United States of America | Conformant |
| Gold | Valcambi S.A. | Switzerland | Conformant |
| Gold | Western Australian Mint (T/a The Perth Mint) | Australia | Conformant |
| Gold | WIELAND Edelmetalle GmbH | Germany | Conformant |
| Gold | Yamakin Co., Ltd. | Japan | Conformant |
| Gold | Yokohama Metal Co., Ltd. | Japan | Conformant |
| Gold | Yunnan Copper Industry Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | China | Conformant |
| Tantalum | AMG Brasil | Brazil | Conformant |
| Tantalum | Asaka Riken Co., Ltd. | Japan | Conformant |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | China | Conformant |
| Tantalum | D Block Metals, LLC | United States of America | Conformant |
| Tantalum | Exotech Inc. | United States of America | Conformant |
| Tantalum | F&X Electro-Materials Ltd. | China | Conformant |
| Tantalum | FIR Metals & Resource Ltd. | China | Conformant |
| Tantalum | Global Advanced Metals Aizu | Japan | Conformant |
| Tantalum | Global Advanced Metals Boyertown | United States of America | Conformant |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd. | China | Conformant |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | China | Conformant |
| Tantalum | H.C. Starck Hermsdorf GmbH | Germany | Conformant |
| Tantalum | H.C. Starck Inc. | United States of America | Conformant |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | China | Conformant |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | China | Conformant |
| Tantalum | Jiangxi Tuohong New Raw Material | 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 |
| Tantalum | KEMET Blue Metals | Mexico | Conformant |
| Tantalum | Meta Materials | North Macedonia | Conformant |
| Tantalum | Metallurgical Products India Pvt., Ltd. | India | Conformant |
| Tantalum | Mineracao Taboca S.A. | Brazil | Conformant |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | Japan | Conformant |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | China | Conformant |
| Tantalum | NPM Silmet AS | Estonia | Conformant |
| Tantalum | QuantumClean | United States of America | Conformant |
| Tantalum | Resind Industria e Comercio Ltda. | Brazil | Conformant |
| Tantalum | Solikamsk Magnesium Works OAO | Russia | Conformant |
| Tantalum | Taki Chemical Co., Ltd. | 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 |
| Tantalum | Telex Metals | United States of America | Conformant |

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| Tantalum | Ulba Metallurgical Plant JSC | Kazakhstan | Conformant |
| Tantalum | XinXing Haorong Electronic Material Co., Ltd. | China | Conformant |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | China | Conformant |
| Tin | Alpha | United States of America | Conformant |
| Tin | An Vinh Joint Stock Mineral Processing Company | Vietnam | On Smelter Look-Up Tab Only |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | China | Conformant |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd. | China | Conformant |
| Tin | China Tin Group Co., Ltd. | China | Conformant |
| Tin | CV Ayi Jaya | Indonesia | Active |
| Tin | CV Venus Inti Perkasa | Indonesia | Active |
| Tin | Dongguan CiEXPO Environmental Engineering Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Tin | Dowa | Japan | Conformant |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Vietnam | On Smelter Look-Up Tab Only |
| Tin | EM Vinto | Bolivia | Conformant |
| Tin | Estanho de Rondonia S.A. | Brazil | On Smelter Look-Up Tab Only |
| Tin | Fenix Metals | Poland | Conformant |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Tin | Gejiu Fengming Metallurgy Chemical Plant | China | Conformant |
| Tin | Gejiu Kai Meng Industry and Trade LLC | China | Conformant |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | China | Conformant |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | China | Conformant |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | China | Conformant |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | China | Conformant |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | China | Conformant |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | China | Conformant |
| Tin | Huichang Jinshunda Tin Co., Ltd. | China | Conformant |
| Tin | Jiangxi New Nanshan Technology Ltd. | China | Conformant |
| Tin | Luna Smelter, Ltd. | Rwanda | Conformant |
| Tin | Ma'anshan Weitai Tin Co., Ltd. | China | Conformant |
| Tin | Magnu's Minerai's Metais e Ligas Ltda. | Brazil | Conformant |
| Tin | Malaysia Smelting Corporation (MSC) | Malaysia | Conformant |
| Tin | Melt Metais e Ligas S.A. | Brazil | Conformant |
| Tin | Metallic Resources, Inc. | United States of America | Conformant |
| Tin | Metallo Belgium N.V. | Belgium | Conformant |
| Tin | Metallo Spain S.L.U. | Spain | Conformant |
| Tin | Mineracao Taboca S.A. | Brazil | Conformant |
| Tin | Minsur | Peru | Conformant |
| Tin | Mitsubishi Materials Corporation | Japan | Conformant |
| Tin | Modeltech Sdn Bhd | Malaysia | On Smelter Look-Up Tab Only |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Vietnam | On Smelter Look-Up Tab Only |
| Tin | Novosibirsk Processing Plant Ltd. | Russia | Active |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | Thailand | Conformant |
| Tin | O.M. Manufacturing Philippines, Inc. | Philippines | Conformant |

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| Tin | Operaciones Metalurgicas S.A. | Bolivia | Conformant |
| Tin | Pongpipat Company Limited | Myanmar | On Smelter Look-Up Tab Only |
| Tin | Precious Minerals and Smelting Limited | India | On Smelter Look-Up Tab Only |
| Tin | PT Aries Kencana Sejahtera | Indonesia | Active |
| 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 Serumpun | Indonesia | Conformant |
| Tin | PT Bukit Timah | Indonesia | Active |
| Tin | PT Lautan Harmonis Sejahtera | Indonesia | Conformant |
| Tin | PT Menara Cipta Mulia | Indonesia | Conformant |
| Tin | PT Mitra Stania Prima | Indonesia | Conformant |
| Tin | PT Mitra Sukses Globalindo | Indonesia | On Smelter Look-Up Tab Only |
| Tin | PT Prima Timah Utama | Indonesia | Conformant |
| Tin | PT Rajawali Rimba Perkasa | Indonesia | Conformant |
| Tin | PT Rajehan Ariq | Indonesia | Conformant |
| Tin | PT Refined Bangka Tin | Indonesia | Conformant |
| Tin | PT Stanindo Inti Perkasa | Indonesia | Conformant |
| Tin | PT Timah Tbk Kundur | Indonesia | Conformant |
| Tin | PT Timah Tbk Mentok | Indonesia | Conformant |
| Tin | PT Tinindo Inter Nusa | Indonesia | Conformant |
| Tin | Resind Industria e Comercio Ltda. | Brazil | Conformant |
| Tin | Rui Da Hung | Taiwan | Conformant |
| Tin | Soft Metais Ltda. | Brazil | Conformant |
| Tin | Super Ligas | Brazil | Active |
| Tin | Thai Nguyen Mining and Metallurgy Co., Ltd. | Vietnam | Conformant |
| Tin | Thaisarco | Thailand | Conformant |
| Tin | Tin Technology & Refining | United States of America | Conformant |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | Vietnam | On Smelter Look-Up Tab Only |
| Tin | VQB Mineral and Trading Group JSC | Vietnam | On Smelter Look-Up Tab Only |
| Tin | White Solder Metalurgia e Mineracao Ltda. | Brazil | Conformant |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | China | Conformant |
| Tin | Yunnan Tin Company Limited | China | Conformant |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | China | Conformant |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | Japan | Conformant |
| Tungsten | ACL Metais Eireli | Brazil | Conformant |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | Brazil | Active |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | Vietnam | Conformant |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | China | Conformant |
| Tungsten | China Molybdenum Co., Ltd. | China | Conformant |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | China | Conformant |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd. | China | On Smelter Look-Up Tab Only |

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| Tungsten | Cronimet Brasil Ltda | Brazil | Active |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd. | China | Conformant |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Tungsten | Fujian Xinlu Tungsten | China | On Smelter Look-Up Tab Only |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | China | Conformant |
| Tungsten | GEM Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Tungsten | Global Tungsten & Powders Corp. | United States of America | Conformant |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | China | Conformant |
| Tungsten | H.C. Starck Tungsten GmbH | Germany | Conformant |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | China | Conformant |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | China | Conformant |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | China | Conformant |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd. | China | Conformant |
| Tungsten | Hydrometallurg, JSC | Russia | Conformant |
| Tungsten | Japan New Metals Co., Ltd. | Japan | Conformant |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | China | On Smelter Look-Up Tab Only |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Xincheng Tungsten Industry Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | China | Conformant |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant" | Russia | Active |
| Tungsten | Kennametal Fallon | United States of America | Conformant |
| Tungsten | Kennametal Huntsville | United States of America | Conformant |
| Tungsten | KGETS CO., LTD. | Korea | Conformant |
| Tungsten | Lianyou Metals Co., Ltd. | Taiwan | Conformant |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Masan Tungsten Chemical LLC (MTC) | Vietnam | Conformant |
| Tungsten | Moliren Ltd. | Russia | Conformant |
| Tungsten | Niagara Refining LLC | United States of America | Conformant |
| Tungsten | NPP Tyazhmetprom LLC | Russia | Active |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | Philippines | Conformant |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG | Germany | Conformant |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | Vietnam | Conformant |
| Tungsten | Unecha Refractory Metals Plant | Russia | Conformant |
| Tungsten | Wolfram Bergbau und Hutten AG | Austria | Conformant |
| Tungsten | Woltech Korea Co., Ltd. | Korea | Conformant |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | China | Conformant |
| Tungsten | Xiamen Tungsten Co., Ltd. | China | Conformant |

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| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | China | Conformant |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | China | On Smelter Look-Up Tab Only |

- a. “Conformant” means that a smelter or refiner has successfully completed an assessment against the applicable Responsible Minerals Assurance Process (“RMAP”) standard or an equivalent cross-recognized assessment. Included smelters and refiners were not necessarily Conformant for all or part of 2020 and may not continue to be Conformant for any future period.
- a. “Active” means that a smelter or refiner has committed to undergo an RMAP assessment, completed the relevant documents, and scheduled the on-site assessment. These may be in the pre-assessment, assessment or corrective-action phases of the assessment.
- a. “On Smelter Look-Up Tab Only” means that a smelter or refiner is listed on the Smelter Look-up tab list of the CMRT, but is not listed as “Conformant” or “Active.”
- a. Smelter or refiner status reflected in the table is based solely on information made publicly available by the RMI, without independent verification by Maxeon.
- a. Country location is the location of the smelter or refiner 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 smelter or refiner 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 smelter or refiner.

The countries of origin of the newly-mined 3TG processed by smelters and refiners listed above may have included countries listed below (as well as possibly other countries).

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

* Represents a Covered Country.

The 3TG processed by the identified smelters and refiners 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 2021 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 smelter or refiner is believed to be irresponsibly sourcing 3TG.
- b. Request that suppliers who have identified non-Conformant or high-risk smelters require their upstream suppliers to find alternative sources of 3TG or require certification of the smelters and refiners 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 steps that Maxeon took for 2020.