



## **Conflict Minerals Policy**

### **Effective as of August 26 2020**

Maxeon fully supports the goals and objectives of federal legislation in the United States, under the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”), which aims to prevent the use of “conflict minerals” that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) or adjoining countries (as defined in the Act). Conflict minerals include: columbite-tantalite (coltan) (i.e., tantalum), cassiterite (i.e., tin), gold, wolframite (i.e., tungsten) or their derivatives (3TG), and could expand to include other minerals or their derivatives, as determined by the U.S. Secretary of State.

Maxeon is committed to avoiding the use of conflict minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries, while continuing to support responsible mineral sourcing in the region. We will immediately suspend or discontinue engagement with suppliers if we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups. Maxeon exercises leadership to address conflict minerals.

Maxeon is committed to complying with the reporting obligations required under the Act, as well as the related rules and regulations issued by the U.S. Securities and Exchange Commission, including the requirement that Maxeon conduct inquiries into the source of any concerned minerals included in our products. Maxeon adopted the Responsible Minerals Initiative (RMI) universal reporting template (the CMRT) and follows the due diligence process prescribed by the Organization for Economic Cooperation and Development (OECD) to ensure consistent, transparent and responsible sourcing of concerned minerals throughout the supply chain. Maxeon conducts annual due diligence on this subject.

Maxeon expects its suppliers to have conflict mineral policies and due diligence measures that give us reasonable assurance that minerals used are conflict-free, this includes passing the same requirements on to their suppliers.

To support this policy, Maxeon will:

- Carry out due diligence consistent with the OECD’s recommended process;
- Require all Maxeon suppliers to acknowledge Maxeon’s Supplier Sustainability Guidelines which follow the SEIA Solar Commitment, and which include this policy as an annex;
- Commit to adopt, widely disseminate, and incorporate this policy in contracts and agreements with suppliers who may source the concerned minerals;
- Require concerned suppliers to declare that all products supplied either do not contain 3TG that are necessary to their production or functionality, or, if they do, that they originate from non-conflict areas or from refiners or smelters that have been validated as being conflict-free;
- Reserve the right to request additional documentation from suppliers regarding the source of any minerals included in its products, and ask for traceability data to be maintained for a minimum of five years;
- Coordinate with other companies, including through RMI, to create better reporting solutions; and
- Ensure transparency of the conflict minerals reporting process by making publicly available our reports.



Maxeon evaluates its relationships with its suppliers on an ongoing basis to ensure continued compliance with this policy. Suppliers who do not comply with these requirements may have their existing business relationship with Maxeon terminated, and will be reviewed by Maxeon's supply chain organization for future business. Violations of this Conflict Minerals Policy may be reported using Maxeon's Compliance and Ethics Helpline at [here](#).