INSIDER TRADING POLICY
First adopted on August 20, 2020
As of 7 Mar 2023

• Purpose

This Insider Trading Policy applies to members of the Board of Directors, officers, employees, and consultants (referred to collectively as “Company Personnel”) of Maxeon Solar Technologies Ltd. and of companies it owns (all of which are referred to collectively for convenience as the “Company”). This Insider Trading Policy also applies to any person residing with a member of the Company Personnel, any other family member whose transactions in Company securities are directed by such person or subject to such person’s influence or control, and any controlled affiliate of such person.

Both the United States Securities and Exchange Commission (the “SEC”) and Congress are very concerned about maintaining the fairness of the U.S. securities markets. The U.S. securities laws, which apply to the Company as a U.S.-listed company, are continually reviewed and amended to prevent people from taking unfair advantage of material nonpublic information and to increase the punishment for those who do. These laws require publicly-traded companies to have clear policies on insider trading. In addition, as the Company is incorporated in Singapore, trading in the securities of the Company is subject to the laws of Singapore, including the relevant provisions under the Securities and Futures Act (Chapter 289 of Singapore) (“SFA”). The SFA applies to acts both occurring within and outside Singapore. If companies like ours do not take active steps to adopt preventive policies and procedures covering securities trades by Company Personnel, the consequences could be severe.

Company Personnel are also prohibited from pledging Company securities, purchasing Company securities on margin, making short sales of Company securities or engaging in any hedging transaction that are designed to hedge or speculate on any change in the market value of the Company’s securities. This Policy continues to apply to transactions in Company securities after a person is no longer employed by or affiliated with the Company. Any person in possession of material nonpublic information when their employment terminates, may not trade in Company securities until that information has become public or is no longer material.

This Policy applies to all transactions in the Company’s securities, including common stock, options for common stock and any other securities the Company may issue from time to time, such as preferred stock, warrants, bonds, notes, debentures, convertible instruments, put or call options (i.e., exchange-traded options), or other similar instruments.

In addition, we maintain this Insider Trading Policy to avoid even the appearance of improper conduct on the part of anyone employed by or associated with our company (not just so-called insiders). We have all worked hard to establish our reputation for integrity and ethical conduct. We cannot afford to have it damaged.

• The Consequences.

Penalties for trading on or communicating material nonpublic information are severe, both for individuals involved in such unlawful conduct and their employers. A person can be subject to some or all of the penalties below even if he or she does not permanently benefit from the violation. Penalties include:

○ jail sentences of up to 20 years;
○ criminal fines (no matter how small the profit) up to $5,000,000 and, in the case of entities only, a
criminal penalty of up to $25,000,000;
- civil fines for the person who committed the violation of up to three times the profit gained or loss avoided, whether or not the person actually benefited;
- civil fines for the employer or other controlling/supervisory person of up to the greater of $1,000,000 or three times the amount of the profit gained or loss avoided;
- disgorgement of profits including reasonable interest;
- civil injunctions; and
- barring individuals from serving as officers or directors of publicly-traded companies.

Moreover, if an employee violates the Company’s Insider Trading Policy, Company-imposed sanctions, including dismissal for cause, could result. Needless to say, any of the above consequences, even an SEC investigation that does not result in prosecution, can tarnish one’s reputation and irreparably damage a career. Finally, it should be noted that there are no limits on the size of a transaction that will trigger insider trading liability. In the past, relatively small trades have resulted in SEC investigations and lawsuits.

In addition to sanctions against an individual who trades illegally, penalties may be assessed against what are known as “controlling persons” with respect to the violator. The term “controlling person” may include employers, its directors, officers and managerial and supervisory personnel. Individuals may also be considered “controlling persons” with respect to any other individual whose behavior they have the power to influence. For this reason, the Company’s supervisory personnel are directed to take appropriate steps to ensure that those they supervise, understand and comply with the requirements set forth in this Policy.

- Our Policy

**No Trading on the Basis of Material Nonpublic Information.** If any Company Personnel has material nonpublic information (often referred to as “insider information”) relating to our Company, that person may not, and may not procure another person to, subscribe for, buy or sell securities of the Company or enter into an agreement to subscribe for, buy or sell securities of the Company, or engage in any other action to take advantage of, or pass on to others, that information. This Policy also prohibits buying or selling securities of other companies while possessing material nonpublic information obtained in the course of performing services for the Company relating to the Company or any other company, including but not limited to our customers, partners and suppliers, our major shareholders (TotalEnergies Solar INTL SAS (“Total Solar”) and TotalEnergies Gaz Electricité Holdings France SAS (“TGEHF,” and together with Total Solar, “TotalEnergies”) and Zhonghuan Singapore Investment and Development Pte. Ltd. (together with its parent company, TCL Zhonghuan Renewable Energy Technology Co., Ltd., “TZE”), and competitors or counterparties in a merger, acquisition or other strategic transaction.

Transactions that may be necessary or justifiable for independent reasons (such as the need to raise money for an emergency expenditure) are no exception. Even the appearance of an improper transaction must be avoided to preserve our reputation for adhering to the highest standards of conduct.

The term “trade” or “trading” means broadly any purchase, sale or other transaction to acquire, transfer or dispose of securities, including market option exercises, gifts or other contributions, exercises of stock options granted under the Company’s stock plans, sales or purchases of stock upon the exercise of options and trades made under an employee benefit plans.

**When is Information Material?** You should assume that information is material if a reasonable investor would consider the information to be important in deciding whether to buy, hold or sell securities of the Company. In short, information is material if you would expect its dissemination to affect the price of our stock. Either positive or negative information may be material. It can be information about the Company...
or about a company with which we do business.

**Examples:** Common examples of information that will frequently be regarded as material are:

- projections of future sales, earnings, losses or other similar financial information;
- significant changes in backlog;
- news of a possible joint venture, merger, acquisition or tender offer, including any non-public expressions of interest in such matters from third parties;
- news of a significant sale of assets;
- significant new products or significant delays in previously announced product introduction or development;
- discoveries with the prospect of leading to new products with significant market potential or grants, allowances or disallowances of patents covering key aspects of products with significant market potential;
- changes in dividend policies, the declaration of a stock split or the offering of additional securities;
- a change of control or changes in management;
- significant transactions with related parties or material changes to existing contracts and arrangements with related parties;
- significant capital expenditures or borrowings;
- plans to raise additional capital through stock sales or otherwise;
- a call of securities for redemption or establishment of, or changes to, a program for the Company to repurchase its own stock;
- the gain or loss of a significant product sale or customer which would materially alter the Company’s internal revenue forecast;
- significant regulatory actions concerning existing, new or proposed products;
- significant changes in operating or financial circumstances, such as cash flow reductions or major write-offs;
- impending bankruptcy or financial liquidity problems;
- any action or event which had or is likely to have a special or extraordinary charge against earnings or capital;
- the threat of new significant litigation, investigations, or enforcement actions, or important developments in existing significant litigation, investigations, or enforcement actions;
- any significant labor disputes or hiring freezes;
- significant developments regarding customers (e.g., significant new sales or contract renewals, lost sales or contract expirations);
- significant developments regarding suppliers (e.g., loss of a supplier, new suppliers, new partnership relationships or joint development projects);
- changes in the Company’s auditors or a notification from its auditors that the Company may no longer rely on the auditors’ audit report;
- a significant cybersecurity incident, such as a data breach, or any other significant disruption in the company’s operations or loss, potential loss, breach of unauthorized access of its properties or assets, whether at its facilities or through its information technology infrastructure; and other
- significant risks or incidents relating to data protection or privacy;
- significant matters which could affect the market for Company securities, such as a forthcoming research recommendation by a major brokerage firm or the intention by any party to buy or sell a large amount of Company securities; and
- other events or developments that the Company elects or is required to disclose in a Form 6-K to be filed with the SEC.

The list of examples provided above is not exhaustive and other events may give rise to information...
that may be material and if disseminated would be expected to impact the price of our stock.

**When is Information Nonpublic?** Information is “nonpublic” if it is not available to the general public. In order for information to be considered public, it must be widely disseminated in a manner making it generally available to investors through a report filed with the SEC or through media such as Dow Jones, Reuters Economic Services, The Wall Street Journal, or Associated Press. The circulation of rumors, even if accurate and reported in the media, does not constitute effective public dissemination. In addition, even after a public announcement of material information, a reasonable period of time must elapse in order for the market to react to the information. Furthermore, the public dissemination of information may be only general in nature and thus an insider may still be deemed to possess material nonpublic information with respect to a matter that is publicly disclosed. When in doubt, please contact the Chief Legal Officer (“CLO”).

We consider two full trading days following publication as a reasonable waiting period before such information is deemed to be public. Therefore, for example, if an announcement is made before the commencement of trading on a Monday, an employee may trade in Company securities starting on Wednesday of that week, because two full trading days would have elapsed by then (that is, all of Monday and Tuesday). As further examples, if the announcement is made on Monday after trading begins, employees may not trade in Company securities until Thursday, and if the announcement is made on Friday after trading begins, employees may not trade in Company securities until Wednesday of the following week. Note that this restriction is in addition to any other restrictions that apply under this Policy, including the requirement that trades be pre-cleared and that they occur during specified trading windows.

**20/20 Hindsight.** Remember, if your securities transactions become the subject of scrutiny, they will be reviewed after-the-fact with the benefit of hindsight. As a result, before engaging in any transaction you should carefully consider how regulators and others might view your transaction in hindsight.

**Transactions by Household Members.** Your family members, as well as others, living in your household also may not buy or sell Company securities or securities of other companies while possessing material nonpublic information that you obtained in the course of performing services for the Company relating to the Company or any other company, including but not limited to our customers, partners, and suppliers, TotalEnergies, TZE and competitors or counterparties in a merger, acquisition or other strategic transaction. Company Personnel are expected to be responsible for compliance by members of their household.

**Do Not Pass Information to Others.** Whether the information is proprietary information about our Company or information that could have an impact on our stock price, Company Personnel must not pass the information on to others. It is illegal to advise others to trade on the basis of undisclosed material information. Liability in these cases can extend to both the “tippee” – the person to whom the insider disclosed inside information – and you, as the “tipper,” and will apply whether or not you derive any benefit from another’s actions.

**When Information is Public.** As you can appreciate, it is also improper for Company Personnel to enter a trade immediately after the Company has made a public announcement of material information, including earnings releases. We impose certain “trading blackouts” to ensure that the Company’s stockholders and the investing public will be afforded the time to receive the information and act upon it. These are discussed below under “Trading Blackouts.” The trading blackouts apply to members of the same household as Company Personnel.

**Pre-Clearance of Trades.** To provide assistance in preventing inadvertent violations and avoiding even the appearance of an improper transaction (which could result, for example, where an employee or consultant engages in a trade while unaware of a pending major development), all members of the Board of
Directors, executive officers, and such other persons as may be designated from time to time and informed of such status by the Company’s CLO are subject to pre-clearance in writing or e-mail confirmation by our CLO, or if the CLO is unavailable, a delegate, of all transactions in Company stock (acquisitions, dispositions, transfers, etc.). To facilitate timely response, such individuals should submit an e-mail or written request for pre-clearance of a transaction no less than two (2) business days before the proposed date of execution of the transaction. Pre-clearance is subject to a one-week expiration and must be renewed by the applicant to be valid. The CLO will furnish an annual report to the Audit Committee that details all insider trading activity by members of the Board of Directors and executive officers. The CLO may not trade in Company securities unless the Company’s Chief Executive Officer (“CEO”) has approved the trade in accordance with the procedures set forth in this Insider Trading Policy.

Pre-clearance does not relieve anyone of his or her responsibility under SEC rules. All Company Personnel, whether subject to pre-clearance or not, are responsible for adhering to this Insider Trading Policy and shall not trade on insider information or trade in violation of applicable blackout period restrictions, as discussed below. If any employee or consultant is in doubt of whether or not trading is permissible, the employee or consultant should inquire with our legal department as a precautionary measure.

Trading Blackouts. In addition to the general prohibition on trading on material nonpublic information, certain Company Personnel will be prohibited from generally trading Company securities under certain circumstances and during regularly recurring quarterly periods, whether or not they actually possess material nonpublic information. Individuals subject to trading blackout restrictions must terminate or withdraw any open limit orders or other unexecuted trade request before the applicable trading blackout period begins.

- **Limited Trading Blackouts** - From time to time, the Company may require that certain Company Personnel and others suspend trading because of developments known to the Company and not yet disclosed to the public. In that event, these persons are prohibited from engaging in any transaction involving the purchase or sale of the Company’s securities during that period and should not disclose to others the fact that they have been suspended from trading.

- **Quarterly Trading Blackouts** - All individuals identified on Exhibit A, which may be updated from time to time, will be subject to a trading blackout period beginning two weeks before the end of a fiscal quarter until two full trading days after earnings for that quarter are released. During the trading blackout period, such individuals are not allowed to buy or sell Company securities. Thus, if an earnings press release is made at 1:00 p.m. on a Monday, Thursday would be the first day on which trading may re-commence. A consultant will be notified in writing or by e-mail if he or she is subject to this quarterly trading blackout restriction.

**Exception for Some Option Exercises.** Cash exercise of options, i.e., where you deliver payment of cash to satisfy the exercise price of an option, currently can be done at any time. However, stock that was acquired upon exercise of a stock option will be treated like any other stock and may not be sold by an employee who is in possession of material nonpublic information. The trading prohibition also does not apply to: (i) the sale of shares and use of proceeds of such sale to satisfy tax withholding requirements for income on shares vested under an equity award, as required by the Company; and (ii) the exercise of a tax withholding right pursuant to which you elect to have the Company withhold shares subject to an equity award to satisfy tax withholding requirements. Cashless exercises or same day sales and exercise of options are prohibited during trading blackouts, as are any other market sales for the purpose of generating the cash needed to pay the exercise price of an equity award.

**Exception for Approved 10b5-1 Plans.** Any individual may at his or her discretion establish a pre-
planned trading program (a “Trading Plan”) designed to enable such person to take advantage of the defense to an allegation of insider trading offered by Rule 10b5-1 of the SEC. Trades that are executed pursuant to a Trading Plan that is established according to the requirements described below do not require pre-clearance as outlined above. An individual’s trades under a Trading Plan may also proceed during trading blackouts and even when the individual may possess material nonpublic information. SEC Rule 10b5-1 provides an affirmative defense from insider trading liability under the federal securities laws for Trading Plans that meet certain requirements, but it does not prevent someone from bringing a lawsuit. This Insider Trading Policy permits individuals to adopt a Trading Plan with brokers that outlines a pre-set plan for trading of the Company’s securities, including the exercise of options or the sale or purchase of vested stock or stock units. Any such program must be in writing and approved at least five days in advance by (i) our legal department and (ii) the CEO or the Chief Financial Officer (“CFO”), or in the CFO’s absence, the Treasurer; and a copy of the approved plan must be filed with the Treasurer. We will be under no obligation to approve such a program and will only do so if we believe the program will meet the requirements of Rule 10b5-1 and will not be adverse to our overall corporate objectives.

Trading Plans should be established in accordance with the following requirements:

- The Trading Plan should include sufficiently specific parameters, such as amount, price and date of the securities trades, or should include a written formula or algorithm for determining the trade terms.

- Trading Plans are to be implemented only during open windows and when the individual is not aware of any material nonpublic information.

- An individual who has established a Trading Plan must act in good faith with respect to the Trading Plan throughout the duration of such Trading Plan.

- The first trade under a new Trading Plan should be at least:
  - for directors and any executive officer (including those who are required to file reports under Section 16 of the Exchange Act, if applicable), the later of: (1) 90 days after the creation of the Trading Plan; and (2) two business days following the disclosure in a periodic report of the Company’s financial results for the fiscal quarter in which the Trading Plan was created (but not to exceed 120 days following creation of the Trading Plan); or
  - for persons other than the Company, a director or executive officer, 30 days after the creation of the Trading Plan.

Such period prior to the first trade being referred to as the “cooling off period”.

- An individual may only have one outstanding Trading Plan at any time. However, this restriction does not apply to:
  - two separate Trading Plans maintained at the same time, so long as one of them only authorizes qualified sell-to-cover transactions (i.e. transactions for the sale of securities as are necessary to satisfy tax withholding obligations incident to the sale or purchase of vested stock units);
  - a series of separate Trading Plans with different broker-dealers or other agents acting on behalf of the individual to execute trades of securities held in separate accounts, provided that the contracts with each broker-dealer or other agent, when taken together as a whole, meet all of
the applicable conditions of Rule 10b5-1; or

- two separate Trading Plans maintained at the same time, so long as trading under the later-commencing Trading Plan is not authorized to begin until after all trades under the earlier-commencing Trading Plan are completed or expire without execution. A cooling off period applies to the later commencing Trading Plan. It should be noted for purposes of the cooling off period, the date of adoption of the later-commencing Trading Plan is deemed to be the date of termination of the earlier-commencing Trading Plan.

- For persons other than the Company, the affirmative defense will only be available for one single-trade plan in a consecutive twelve-month period. A Trading Plan "designed to effect" the open-market purchase or sale of the Company's securities as a single transaction will not receive the benefit of the affirmative defense unless: (1) the individual who entered into the Trading Plan has not, during the prior 12-month period, adopted another Trading Plan that was designed to effect the open-market purchase or sale in a single transaction; and (2) such other contract, instruction, or Trading Plan in fact was eligible to receive the affirmative defense. This restriction does not apply to Trading Plans authorizing only qualified sell-to-cover transactions or where the broker retains discretion over whether to execute the contract, instruction, or plan as a single transaction.

- New or modified Trading Plans should include a representation from directors and executive officers at the time of the adoption that (1) they are not aware of material nonpublic information about the Company or its securities, and (2) they are adopting the plan in good faith and not as part of a plan or scheme to evade the prohibitions of Rule 10b-5.

We may choose to publicly announce the establishment of a Trading Plan with respect to a given individual.

Establishing a Trading Plan does not exempt individuals from complying with the Section 16 six-month short swing profit rules or liability thereunder, to the extent applicable.

Revocation/Amendments to Plans. An individual may revoke or amend his or her Trading Plan at any time. We discourage multiple amendments to Trading Plans. Revocation of a Trading Plan should occur only in unusual circumstances and requires prior review and approval by the CLO. Revocation or amendment is effective upon written notice to the broker. However, if the individual revokes or amends his or her Trading Plan, then the individual must revoke all of his or her other outstanding Trading Plans and agree that any trading under a new or revised Trading Plan will not commence until the cooling off period described above has passed for the creation of a new Trading Plan or amendment of an existing Trading Plan.

Under certain circumstances, a Trading Plan must be suspended or terminated. This may include circumstances that would cause the transaction either to violate the law or to have an adverse effect on the Company. The legal department, the CFO, the Treasurer, and the Company’s stock plan administrator are authorized to notify the broker in such circumstances.

- Director and Officer Cashless Exercise. In response to the restrictions set forth in the Sarbanes-Oxley Act of 2002, the Company will not arrange with brokers to administer cashless exercises on behalf of directors and officers of the Company. Directors and executive officers of the Company may only utilize the cashless exercise feature of their options if (i) the director or officer selects a broker exercising discretion independently of the Company, (ii) the Company’s involvement is limited to confirming that it will deliver the stock promptly upon payment of the exercise price and (iii) the director or officer uses a “T+2” cashless exercise arrangement, in which the Company
agrees to deliver stock against the payment of the purchase price on the same day the sale of the stock underlying the option settles. Under a T+2 cashless exercise, a stockbroker, the issuer, and the transfer agent of the issuer work together to make all transactions settle simultaneously. This approach is to avoid any inference that the Company has “extended credit” in the form of a personal loan to the director or executive officer. Any employee who has any questions about cashless exercises may obtain additional guidance from our CFO.

- **Director and Officer Trading During Pension and 401(k) Plan Blackouts periods.** In response to the restrictions set forth in the Sarbanes-Oxley Act of 2002, directors and officers of the Company are prohibited from trading Company securities during pension and 401(k) plan blackouts, if any.

- **Additional Prohibited Transactions**

  Because we believe it is improper and inappropriate for any Company Personnel to engage in short-term or speculative transactions involving Company stock, it is the Company’s policy that Company Personnel should not engage in any of the following activities with respect to securities of the Company. We believe that this sort of trading can reflect badly on the Company and Company Personnel are prohibited from engaging in any types of transaction that are commonly viewed as a form of “betting” for or against the Company or otherwise hedging their ownership of Company securities:

  - **Pledging Company securities or purchases of Company securities on margin** - This means borrowing from a brokerage firm, bank or other entity in order to buy Company stock (other than in connection with a so-called “cashless” exercise of options under the Company’s stock plans). Securities held in a margin account or pledged as collateral for a loan may be sold without your consent by the broker if you fail to meet a margin call or by the lender in foreclosure if you default on the loan. A margin or foreclosure sale that occurs when you are aware of material nonpublic information may, under some circumstances, result in unlawful insider trading. Because of this danger, Company Personnel should not hold Company securities in a margin account or pledge Company securities as collateral for a loan.

  - **Short sales of Company securities** - This involves selling Company stock that you do not own in the expectation that the price of the stock will fall, or as part of an arbitrage transaction. These types of activities are inherently speculative in nature and contrary to the best interests of the Company and its stockholders. Accordingly, all Company Personnel are prohibited from selling the Company’s stock short.

  - **Any hedging of Company stock** - All Company Personnel are prohibited from hedging their ownership of Company securities. This prohibition covers all hedging transactions (including, without limitation, transactions involving options, puts, calls, prepaid variable forward contracts, equity swaps, collars, exchange traded funds or other derivatives) that are designed to hedge or speculate on any change in the market value of the Company’s securities. Such short-range speculative activities may put the personal gain of the employee or other Company Personnel in conflict with the best interests of the Company and its stockholders. This policy does not pertain to employee stock options granted by the Company. Employee stock options cannot be traded.

- **Confidential Information and Communications with the Media**

  Unauthorized disclosure of internal information relating to the Company (including information regarding new products, the Company’s customers, partners or suppliers, TotalEnergies, TZE and competitors or counterparties in a merger, acquisition, or other strategic transaction) could cause competitive harm to the Company and in some cases could result in liability for the Company.
• **Unauthorized Disclosure.** Company personnel should not disclose internal information about the Company to anyone outside the Company, except as required in the performance of regular duties for the Company.

• **Communications with Media, Securities Analysts and Investors.** Communications on behalf of the Company with the media, securities analysts and investors must be made only by specifically designated representatives of the Company according to the approved Communications Policy.

• **Safeguarding Confidential Information.** Care must be taken to safeguard the confidentiality of internal information. For example, sensitive documents should not be left lying on desks, and visitors should not be left unattended in offices containing internal Company documents.

• **Rumors.** Rumors concerning the business and affairs of the Company may circulate from time to time. Our general policy is not to comment upon those rumors. Individual employees and consultants should also refrain from commenting upon or responding to rumors and should refer any requests for comments or responses to the CFO or in his absence the CEO.

• **Applicability of U.S. Securities Laws to International Transactions.**

  All employees of the Company and its subsidiaries are subject to the restrictions on trading in Company securities and the securities of other companies. The U.S. securities laws may be applicable to the securities of the Company’s subsidiaries or affiliates, including TotalEnergies, TZE, and their respective affiliates, even if they are located outside the United States. Transactions involving securities of subsidiaries or affiliates should be carefully reviewed by counsel for compliance not only with local law but also for possible application of U.S. securities laws.

• **Company Assistance.**

  Any person who has any questions about specific transactions may obtain additional guidance from our CFO or the legal department. Remember, however, the ultimate responsibility for adhering to this Insider Trading Policy and avoiding improper transactions rests with you. In this regard, it is imperative that you use your best judgment.

• **Modifications.**

  This Insider Trading Policy has been approved by the Company’s Board of Directors. Officers of the Company may, from time to time, make non-substantive modifications to this Insider Trading Policy (including, without limitation, substitution of the names of the appropriate contact persons within the Company and modifications of Exhibit A) without prior approval of the Company’s Board of Directors. The Nominating and Corporate Governance Committee should oversee compliance with this Insider Trading Policy and report on such compliance to the Board. The Nominating and Corporate Governance Committee should also review this Insider Trading Policy no less frequently than annually and recommend any changes to the Board for its approval and adoption.
• **No Circumvention.**

   No circumvention of this Insider Trading Policy is permitted; individuals must not try to accomplish indirectly what is prohibited directly by this Insider Trading Policy.

• **Acknowledgements.**

   All individuals subject to this Insider Trading Policy must certify that they have read and intend to comply with the procedure set forth in this policy. Such certification may be submitted either in writing or through electronic means made available by Human Resources as part of its online training programs.
Exhibit A

Persons Subject to Regular Quarterly Black-Out Periods

All members of the following groups, departments or personnel:
- Board of Directors
- CEO and direct Reports to the CEO
- Direct reports to CEO direct reports
- Director-level and above employees
- Administrative Assistants to CEO and CEO Direct Reports
- Stock Administration
- Internal Audit
- Disclosure Committee
- Corporate Controller
- Investor Relations
- Corporate Communications

Any other persons notified by the CEO, CFO, Legal department, or Stock Administration department