



## GLOBAL HUMAN RIGHTS POLICY

Maxeon Solar Technologies, Pte. and all of its subsidiaries (collectively “Maxeon”) are committed to respecting human rights. This Global Human Rights Policy (this “Policy”) establishes standards for global business conduct related to human rights and labor for Maxeon employees, suppliers and other business partners, in each case wherever located (these suppliers and other business partners are referred to as “suppliers” in this Policy). This Policy is informed by, among other things, the [Universal Declaration of Human Rights](#), the [Conventions of the International Labour Organization](#), the [UN Guiding Principles on Business and Human Rights](#), the [UN Global Compact](#), and the [OECD Guidelines for Multinational Enterprises](#).

This Policy goes beyond mere compliance with law. When differences arise between standards and legal requirements, the higher standard applies, in compliance with applicable law. We also expect our employees and suppliers to conduct themselves in accordance with all other Maxeon policies, including the [Supplier Sustainability Guidelines](#) and our Code of Conduct.

Maxeon actively seeks to protect the rights of its workers by publishing this Policy throughout its facilities in local languages and broadly communicating Maxeon’s Compliance and Ethics Helpline at <https://maxeon.ethicspoint.com>.

Maxeon also makes relevant suppliers aware of this Policy. Maxeon is committed to conducting due diligence on an as-needed basis to confirm suppliers are conforming to our stated requirements.

### **Human Rights Principles**

We respect human rights and are committed to ensuring that our employees, workers in our supply chains and individuals in the communities affected by our activities are treated with dignity and respect. Maxeon has consulted with stakeholders within the company and subject matter experts to develop elements of this Policy.

As part of our commitment to human rights, we expect Maxeon employees and suppliers to adhere to the following principles.

#### *Humane Treatment*

Maxeon seeks to ensure that workers are treated with dignity, and expects suppliers to do the same. There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, forced contraception, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures should be clearly defined and communicated to workers.



### *Equal Opportunity and Diversity; Non-Discrimination*

Maxeon rejects all forms of discrimination and harassment at the workplace, including due to sex (which includes pregnancy, childbirth, breastfeeding, or related medical conditions, the actual sex of the individual, or the gender identity or gender expression), race, color, religion (including religious dress practices and religious grooming practices), sexual orientation, national origin, ancestry, citizenship, marital status, familial status, age, physical disability, mental disability, medical condition, genetic information, protected veteran or military status, or any other characteristic protected by local law or regulation.

Maxeon supports minority and indigenous person's rights in the countries we operate, and expects our suppliers to do the same. As such, Maxeon respects the rights of local communities and cultures and attempts to reduce impacts on their ways of life, and expects suppliers to do the same.

### *Freely Chosen Employment; Recruitment Fees*

Maxeon requires its suppliers to ensure that they do not engage in any form of modern slavery. For purposes of this Policy, modern slavery includes human trafficking or forced, bonded or indentured labor, debt bondage, or involuntary prison labor. All work must be voluntary, without coercion, and workers should be free to leave upon reasonable notice. Workers should not be required to allow the employer or any other person to retain government-issued identification, passports or work permits as a condition of employment. Maxeon also prohibits recruited employees from paying fees in connection with recruitment to deter the potential for forced labor. Maxeon expects its suppliers to undertake the necessary measures to ensure that their direct suppliers do not engage in the foregoing prohibited conduct and activities.

### *Child Labor Avoidance*

Child labor is not to be used in any stage of manufacturing or otherwise in connection with any Maxeon contract. 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.

### *Working Hours*



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.

#### *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 made. The basis on which workers are being paid is to be provided to the worker in a timely manner via pay stub or similar documentation.

#### *Freedom of Association and Speech*

The rights of workers to associate freely, join or not join labor unions, seek representation, and join workers' councils in accordance with local laws should be respected. Maxeon also rejects limitations on free speech, expression, thought, consciousness and religion, and requires suppliers to do the same. This Policy should not be interpreted to prohibit Maxeon or its suppliers from limiting the individuals that may speak on their behalf, from adopting social media policies (including policies relating to hate speech), or from taking remedial action if those policies are violated.

#### *Health and Safety*

As part of our commitment to a safe and healthy workplace, to the extent applicable, we expect Maxeon employees and suppliers to adhere to the requirements outlined below. In addition to these requirements, suppliers are expected to be aware of and operate consistently with the more detailed health and safety requirements in Maxeon's Supplier Sustainability Guidelines and Environment, Health and Safety Policy.

- Worker exposure to potential safety hazards are to be identified, evaluated and controlled. Where hazards cannot be adequately controlled, workers are to be provided with appropriate, well-maintained, personal protective equipment.
- Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures.
- Occupational injury and illness procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness. Suppliers should not take any action that discourages the accurate and timely reporting by workers of workplace injuries.



- Worker exposure to the hazards of physically demanding tasks is to be identified, evaluated and controlled.
- Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Facilities and any worker dormitories provided by the supplier or a labor agent, as applicable, 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.

Maxeon further agrees that the right to water is a fundamental human right. Our employees, as well as workers throughout our supply chain, must have access to safe drinking water.

### *Environmental Justice*

Climate change represents a significant threat to the livelihoods of workers throughout supply chains. Flooding, extreme heat, drought, wildfires and other weather events will negatively impact many of the people who are part of our value chain. We seek to advance environmental justice by mitigating climate change, and expect our suppliers to do so as well.

### *Accountability*

Human rights violations by our employees are unacceptable and impermissible pursuant to the principles and values embodied in our Code of Conduct. If an employee's conduct (or failure to act) is inconsistent with the principles and values embraced in Maxeon's Code of Conduct, disciplinary action, up to and including termination of employment, may result. Maxeon expects its suppliers to report any employee conduct that may constitute a violation of our Code of Conduct or the law. This may be done through Maxeon's Compliance and Ethics Helpline at <https://maxeon.ethicspoint.com>.

Maxeon attempts to hold its suppliers to the same standards as its employees. Maxeon does this through its Master Services Agreements, which require suppliers to acknowledge this Policy and their responsibilities pursuant to it. Maxeon also expects its suppliers to track and make available to Maxeon upon request relevant information on their human rights compliance, including timely responding to any annual assessments conducted by Maxeon and certifying compliance when so asked by Maxeon. Maxeon retains the right to conduct audits of suppliers to evaluate their compliance with this Policy. Violations of this Policy by a supplier may result in the termination of Maxeon's business relationship with the supplier, including the refusal to pay then outstanding invoices if doing so may cause liability to Maxeon or violate the law.

Maxeon's Chief Ethics & Compliance Officer is responsible for the execution of this Policy and periodically reports to the Board of Directors on progress against the Policy.



### *Grievance Mechanism*

Maxeon has a Compliance and Ethics Helpline that is available 24 hours a day, 7 days a week. This line is available to answer questions on business conduct issues, policies, regulations and compliance with legal requirements. Where allowed by law, you may report your concerns through the Helpline anonymously. Additional information about the Helpline may be found at <https://maxeon.ethicspoint.com>. You may also report any issues or concerns directly to Maxeon's Chief Ethics and Compliance Officer via email at [GeneralCounsel@maxeon.com](mailto:GeneralCounsel@maxeon.com).