

# Modern Slavery Statement 2024

SunPower Corporation Australia Pty Ltd

SUNPOWER | TCL SOLAR





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# Our first modern slavery statement of a new era



In 2024, Maxeon Solar Technologies underwent significant transformations causing profound changes to its corporate structure.

As of March 2025, SunPower Corporation Australia has officially been incorporated as a new energy division within TCL Zhonghuan, which is rated in the top 2% of global companies for ESG Performance by leading supply chain evaluator Ecovadis, signalling the start of a fresh era in smart, sustainable living. As the solar industry continues to evolve, we are more dedicated than ever to maintaining high standards and transparency, even as we integrate closer into the TCL Zhonghuan ecosystem.

As a global company with a complex supply chain, we acknowledge the persistent risks of modern slavery within our sector. Understanding and managing these risks require a collaborative approach with our workforce, suppliers and other stakeholders.

This is why we are proud to make this public statement of our values, policies and commitments, both for our own company and as an industry leader in sustainability. It is furtherance of our pledge to uphold the values of the United Nations Global Compact. We are also proud that Maxeon Solar Technologies, our former parent company, was named the number 22 Most Sustainable Company in Corporate Knights' most recent top 100 ranking of global companies, placing it in the top one half of 1% of all companies globally for the last full reporting period that we were under their umbrella.

## WE SUPPORT





# Our first modern slavery statement of a new era

This is our fourth Statement (the “Statement”) in response to the Modern Slavery Act 2018 (the “Act”). The ‘reporting entity’ for this Statement is SunPower Corporation Australia Pty. Ltd. (ACN: 009 066 380 ABN: 67009066380) (“we”, “our” or “SunPower Australia”).

Our corporate address is:

**Suite 207/28 Riddell Parade**

**Elsternwick, Victoria, Australia 3185 1 800 786 769**

SunPower Australia does not own or control any other entities. We are an indirect wholly-owned subsidiary of TCL Zhonghuan (TZE), a Chinese publicly listed company.

This Statement is made voluntarily for the reporting period 1 January 2024 to 31 December 2024.

This Statement outlines how we identify and assess modern slavery risks in our operations and supply chain, the actions we have taken to address those risks and the progress we have made to improve our understanding and effectiveness of the management of modern slavery and human trafficking risks.

SunPower Australia operates using TCL Zhonghuan group-wide policies and procedures to assess and manage modern slavery risks. The adoption of those policies is not intended to convey how we are structured, managed or controlled.

As proud members of TCL Zhonghuan, we’re excited to continue upholding our exceptional standards well into the future. This commitment is reinforced by achievements like earning the ISO20400 Sustainable Procurement Statement of Compliance certification from the British Standards Institution (BSI) this March 2025—a testament to our commitment.

This Statement was approved by our Sole Director Stephen Straughair, SunPower Australia General Manager, on 23 June 2025.

If you have any questions about this Statement, please contact **Stephen Straughair:**

[stephen.straughair@sunpowerglobal.com](mailto:stephen.straughair@sunpowerglobal.com)

Signed by:



**Stephen Straughair**

General Manager

SunPower Corporation Australia Pty. Ltd.



# Our new parent’s commitment to sustainability

## 2024 ESG Ratings

- MSCI ESG rating “BBB”**, the highest level in the Chinese photovoltaic industry
- S&P Global CSA rating of “73” points**, TOP 1 in the Chinese photovoltaic industry, and top 6% globally in the industry
- “A-” level in the CDP Water Security** Questionnaire Leadership, leading the solar manufacturing industry
- CDP Climate Change** Questionnaire Management Level: “B”
- Wind ESG rating “A” level**

## TCL Zhonghuan obtains ISO20400

On 15th March 2025, TCL Zhonghuan obtained the **ISO 20400 Sustainable Procurement Statement of Compliance from the British Standards Institution (BSI)**. This accomplishment highlights the company’s internationally recognized capabilities in sustainable procurement management and represents a significant advancement in fostering green and responsible supply chain systems.



## Non-exhaustive list of 3rd Party Certifications







# Assessing modern slavery risks

## Our operations

SunPower Australia employs 27 staff located in Victoria, New South Wales and Western Australia. Management in Australia leads the sale of goods into the Asia-Pacific region and occasionally other markets. We have a regional office in Melbourne, Victoria, and staff outside of Melbourne work remotely. Our staff cover a range of functions in Australia: Management (3 staff across VIC and NSW), Sales (5 staff across VIC and NSW), Marketing (4 across VIC and NSW), Finance Sales Operations & Administration (4 staff in VIC), Legal (1 staff in VIC), Channel Management (1 staff in VIC), Planning & Joint Venture Operations (1 staff in WA), Training and Product Engineering (5 staff across VIC and NSW) and Fulfilment & Customer Care (3 staff in VIC).

We sell a range of solar panel solutions for residential power (for example, rooftop solar panels) and commercial power applications (for example, providing solar panels to solar power plants including the Limondale 394 MW plant located in Balranald in regional NSW) and specialty product unique applications (such as space and electric vehicle applications).

Our brands include the SunPower Maxeon IBC, SunPower Performance TOPCon, SunPower Reserve home energy storage system and TCL Solar TOPCon manufactured by Maxeon Solar Technologies, Ltd (SunPower Maxeon IBC) and its supplier Huansheng Photovoltaic (Jiangsu) Co., Ltd (“HSPV”) and Huansheng Solar New Energy (“HSNE”) (SunPower Performance TOPCon and TCL Solar TOPCon) and ALPHA ESS (SunPower Reserve home energy storage system) with which we have an agreement to sell offtake outside of China.

## Risks in our operations

To assess the risk of modern slavery in our operations, we complete an initial desktop assessment. This included an analysis of (i) the local conditions in the country where we employ workers; (ii) the qualifications and status of the workers we employ; and (iii) any other red flags that came to our attention (through consultations with specialist third-party service providers, media, grievance mechanisms, etc.). We take reference from the Global Slavery Index<sup>1</sup> while assessing the risks of modern slavery in the countries where we operate of have suppliers.

The risk of modern slavery in our operations is assessed to be low. First, Australia is considered a low-risk country for modern slavery. Second, our workforce comprises entirely highly credentialed and experienced professionals that are not the profile for being at risk of modern slavery. We occasionally employ workers on a temporary basis but not in roles of a nature considered to involve risks of modern slavery. Finally, no red flags were identified in our operations during the reporting period.

## Risks in our Supply Chain Outside of Australia

As a solar manufacturer, our supply chain is heavily reliant on critical minerals and Chinese suppliers. Therefore, our actions to address modern slavery focus on addressing the risks in these two areas.

1 Available at [www.globalslaveryindex.org](http://www.globalslaveryindex.org). Note that data is from 2023.



## Our storage solutions partner Alpha ESS

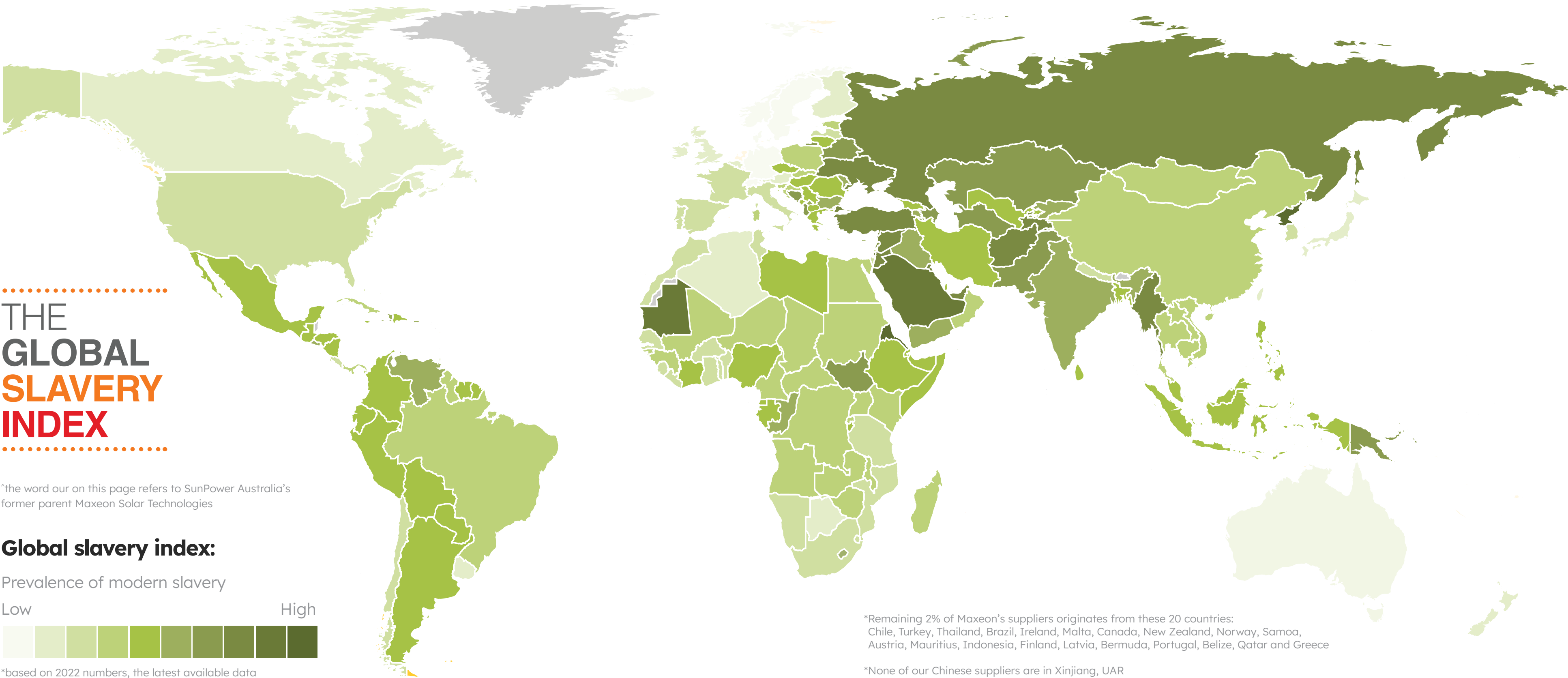
We also sell battery systems produced by Alpha ESS, a third-party, as part of our SunPower One offering. We have conducted due diligence on the company, including seeking detailed information about its supply chain, and have not uncovered any irregularities to date that would indicate modern slavery in its facilities or in its supply chain.



# Assessing modern slavery risks

## Risks of modern slavery in our supply chain^

Over 98% of suppliers originated from the 23 countries shown in the map:



- Americas**
- United States** 317 Suppliers
  - Mexico** 309 Suppliers
- Europe and Central Asia**
- Belgium** 13 Suppliers
  - France** 207 Suppliers
  - Germany** 58 Suppliers
  - Italy** 41 Suppliers
  - Netherlands** 28 Suppliers
  - Poland** 5 Suppliers
  - Spain** 17 Suppliers
  - Switzerland** 28 Suppliers
  - United Kingdom** 30 Suppliers
- Africa**
- South Africa** 48 Suppliers
- Middle East**
- Israel** 4 Suppliers
- Asia and the Pacific**
- Australia** 80 Suppliers
  - China** 115 Suppliers
  - Hong Kong** 13 Suppliers
  - India** 16 Suppliers
  - Japan** 45 Suppliers
  - Malaysia** 395 Suppliers
  - Philippines** 289 Suppliers
  - Singapore** 184 Suppliers
  - South Korea** 11 Supplier
  - Taiwan** 9 Suppliers








# Assessing modern slavery risks

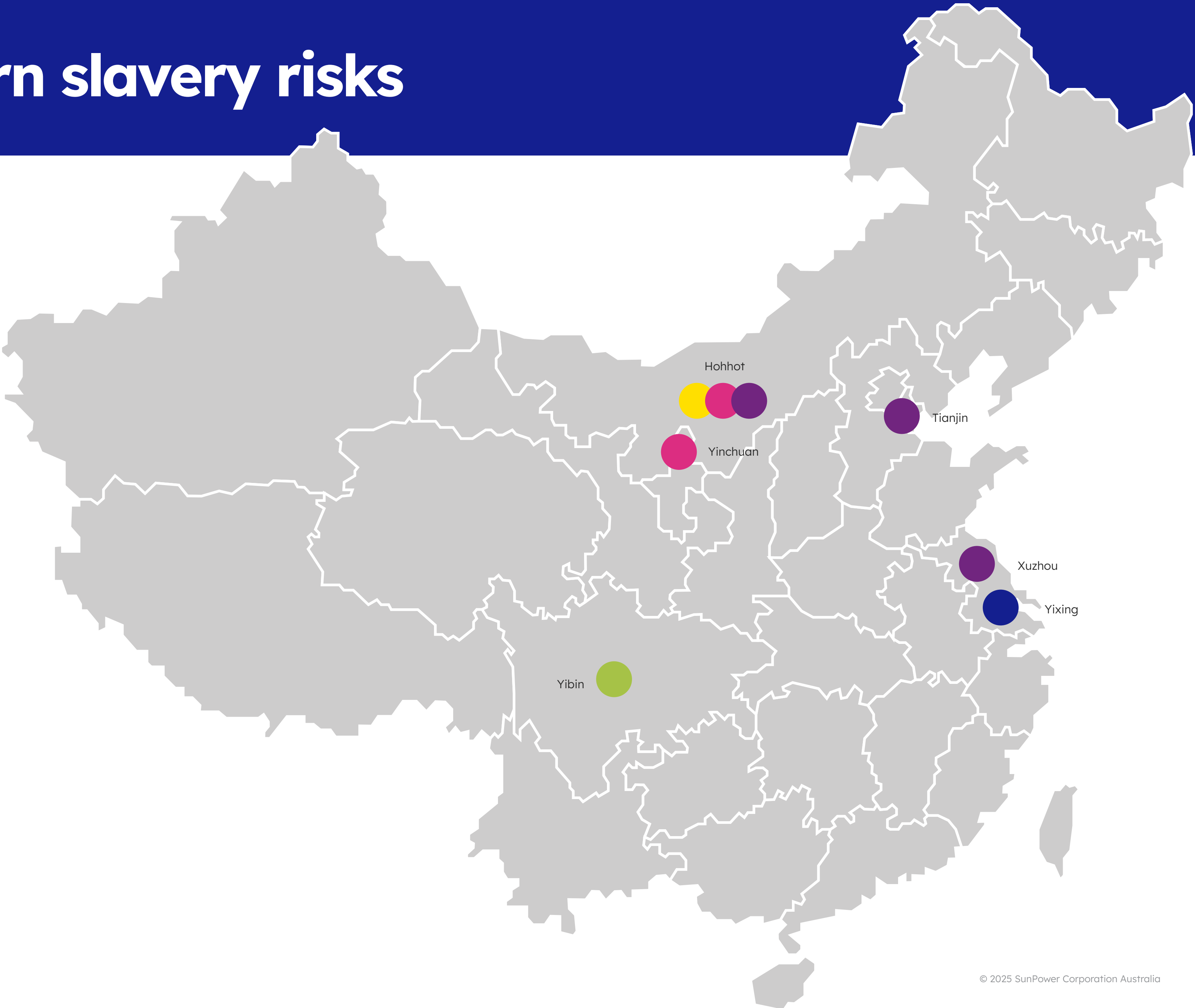
## Focus on our Chinese supply chain

We have mapped all of the supply locations for our Chinese suppliers’ production of polysilicon, ingots, wafers, cells and modules from and between locations in China.

Movements of these components within the products we sell are tracked using the Manufacturer Execution System (MES) to ensure traceability from China to a customer’s rooftop in Australia.

**None of these suppliers are in Xinjiang, UAR.**

-  Polysilicon
-  Ingot
-  Wafer
-  Cell
-  Module





# Assessing modern slavery risks

## Critical minerals in the supply chain

In our industry, which relies heavily on raw materials, the greatest risks of modern slavery in Tier Two suppliers are identified as the suppliers of (i) tungsten, tantalum, tin and gold (3TG); and (ii) metallurgical grade silicon (MGSi). These minerals are classified as ‘critical minerals’ as they are vital for making solar products.

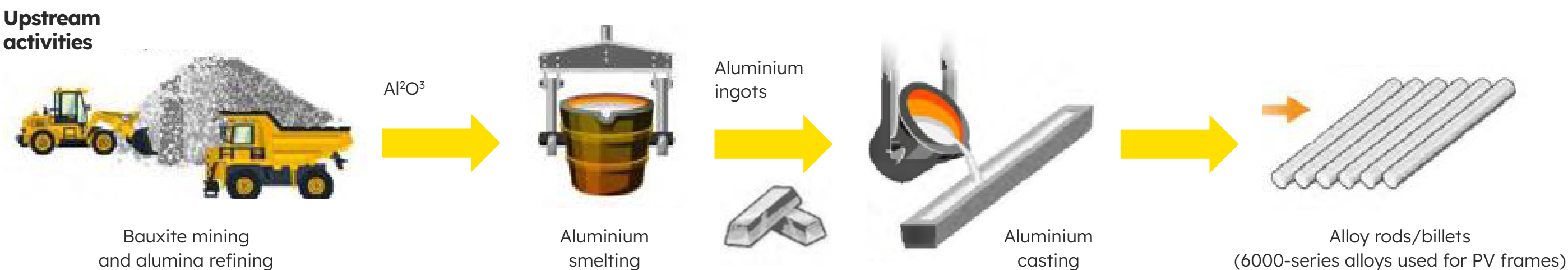
50 <b>Sn</b> Tin 118.711	73 <b>Ta</b> Tantalum 180.95
74 <b>W</b> Tungsten 183.84	79 <b>Au</b> Gold 196.967

**3TG** - are identified internationally as natural resources which have a high prominence of extraction from conflict zones and are often sold to perpetuate and fund conflict. Much of the labour involved in extracting conflict minerals is child and forced labour. The most prominent contemporary example has been the eastern provinces of the Democratic Republic of the Congo.

**MGSi** - there is an industry-wide risk of MGSi which relates to allegations of modern slavery in MGSi. We do not source any MGSi from Xinjiang, and neither do any of our suppliers’ suppliers, to the best of our knowledge following our due diligence processes as described in this document.

**Aluminium** - We have put a strong focus on mapping and stress testing our aluminum supply chain to ensure visibility on the provenance and ensure no exposure to Xinjiang province, UAR. (see chart below)

## Briefing on aluminum frame production process





# Actions to address the risks of modern slavery

## Our initiatives: Due diligence and audits

### Chain of custody audit

A chain of custody audit for traceability goes through every step of the process to ensure inputs are tracked from the source of the raw materials to the final product received by the customer.

Focus is on documentation such as purchase orders and transportation documents and systems to track lot numbers at factories such as usage of Manufacturer's Execution System (MES).

### Social audit

These audits focus on working conditions at a factory, compliance with forced labor laws and other ESG factors in a holistic evaluation of the site audited.

One leading standard is the SMETA (Sedex Members Ethical Trade Audit) methodology, the most widely used format for social audits in the world.

**It is challenging but we are seeing that these audits can be conducted in China at present with the right parameters and sensitivity to the local context.**





# Actions to address the risks of modern slavery

## Our initiatives: Social supply chain audit

### Ethical and responsible sourcing

- More than 60,000 member organisations from over 180 countries use Sedex’s online platform to operate responsibly and sustainably, protect workers and ensure ethical sourcing.
- We have engaged an audit firm to audit supply chain operations and working conditions. The audited results are uploaded on the Sedex platform.
- The latest SMETA audit at the solar factory manufacturing our products in China was conducted on HSNE in April 2024. All registered members of Sedex can request for a copy of the audit report from Sedex via the platform.



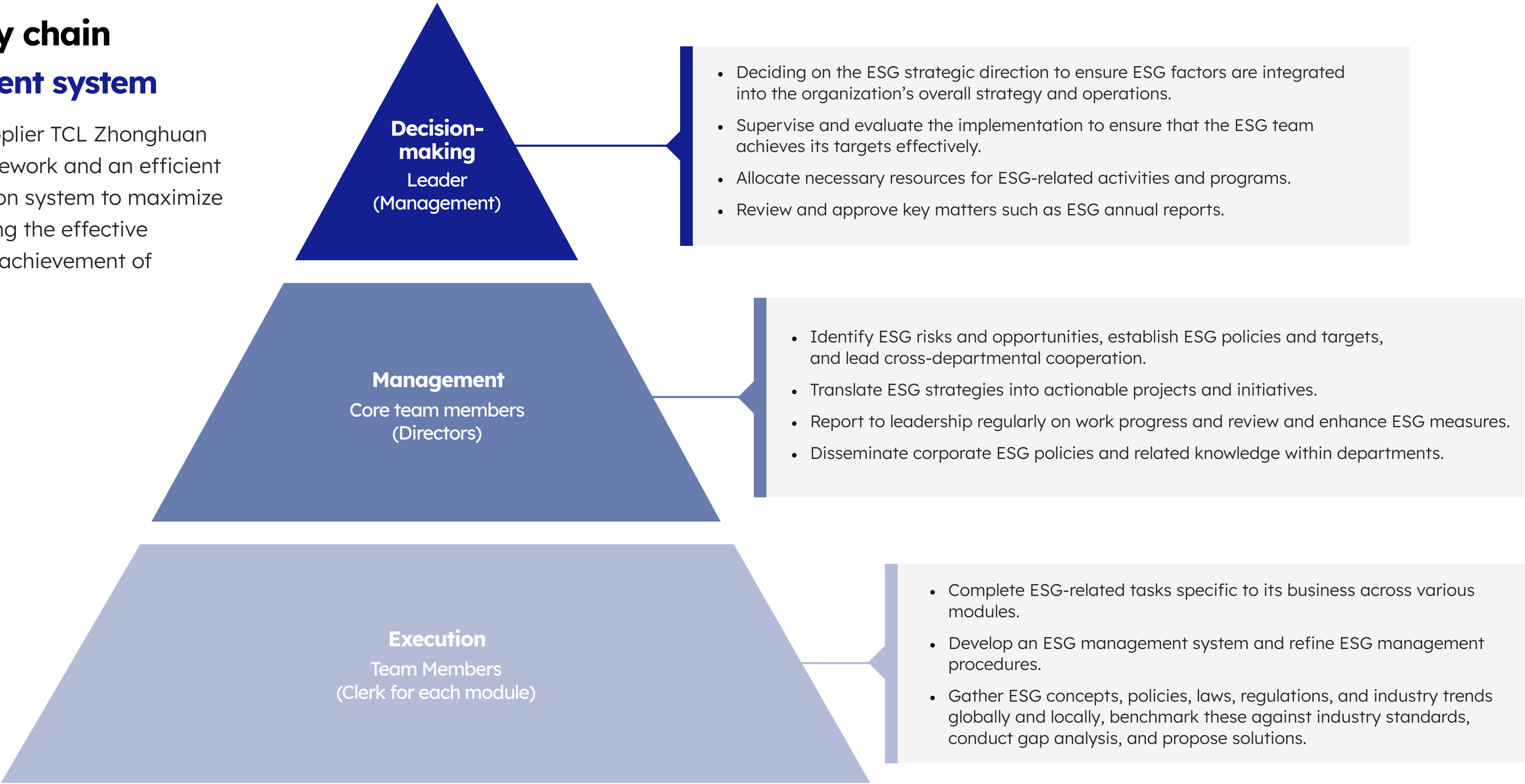
Pre-audit	Supplier completes the Sedex Self-Assessment Questionnaire (SAQ) Supplier shares existing audits, including the SAQ, with buyer Buyer reviews inherent risk score in Sedex risk assessment tool Buyer prioritizes supplier sites and defines requirements for audit
Audit	SMETA process assesses a site’s standards of labour, health and safety, environment and business ethics Auditor will conduct supplier site visit, consisting of a site tour, interviews, and document review Auditor will hold a closing meeting to review the Corrective Action Plan Report
Post-audit	Supplier and buyer review final audit report on Sedex digital platform to assess findings and areas of non-compliance Supplier and buyer work to resolves corrective action, auditor ultimately verifies resolution Once a site undergoes a SMETA audit , supplier can share report with other customers via the Sedex platform



# Actions to address the risks of modern slavery

## Responsible supply chain Supplier management system

Our parent company and supplier TCL Zhonghuan (TZE) has a governance framework and an efficient management and coordination system to maximize resource mobilization, ensuring the effective roll-out of strategies and the achievement of defined objectives.

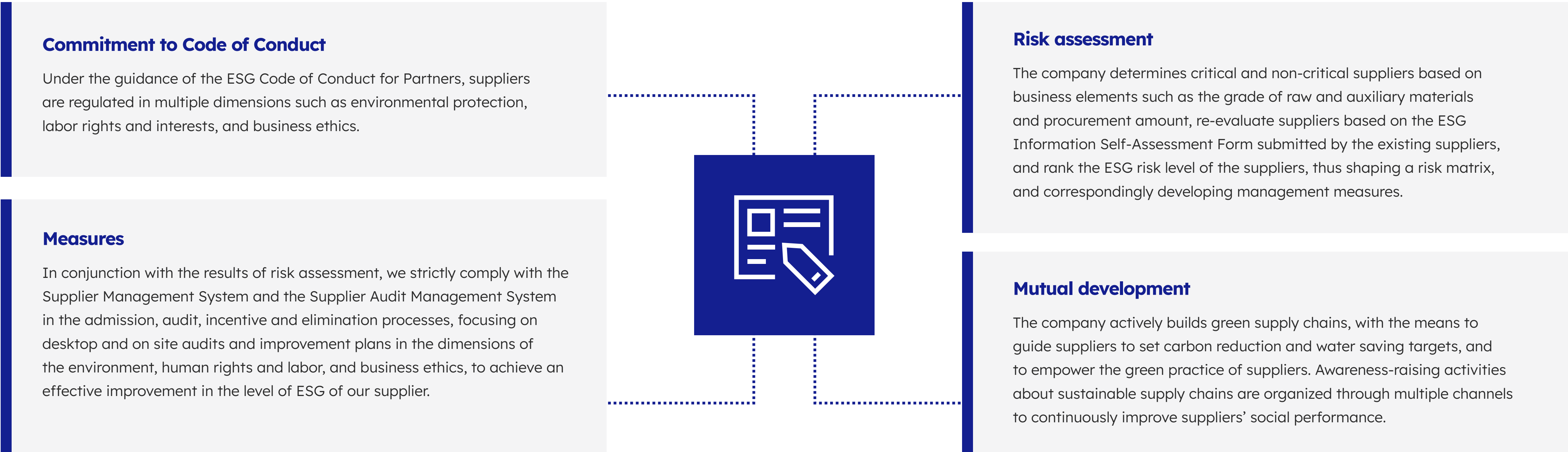




# Actions to address the risks of modern slavery

## Supply chain management system

TZE has established and implemented an ESG Code of Conduct for Partners, assessed the ESG risk level of suppliers and formulated graded management measures, strictly reviewed and proposed improvement plans based on risk results, enhanced the sustainable development capabilities of suppliers, and actively promoted the construction of a green supply chain. Simultaneously, TZE has actively promoted the concept of sustainability to upstream and downstream enterprises within the supply chain, encouraged suppliers to establish carbon reduction and water conservation goals, and accelerated the development of a sustainable supply chain. In 2024, TZE Supply Chain Management Platform integrated sustainable procurement management into its full lifecycle procurement practices.





# Actions to address the risks of modern slavery

## Commitment to Code of Conduct

TZE has developed and implemented the ESG Code of Conduct for Partners to standardize suppliers’ behavior. The Code applies to all partners, including suppliers and service providers, and covers areas such as environmental protection, human rights and labor rights, prohibition of child labor and forced labor, occupational health and safety, business ethics, privacy and information security protection, prohibition of the use of conflict minerals and community inclusion. Since 2022, while signing the business contract, new suppliers have been required to sign the ESG Code of Conduct for Partners. Violation of the ESG Code of Conduct for Partners may result in the termination of its business relationship with TZE. In 2024, no suppliers were found to have business ceased due to violation of the ESG Code of Conduct for Partners.

\*We describe the TZE code of conduct for suppliers here because it is the standard that is applied to the highest risk suppliers in our supply chain, which are TZE’s suppliers.

## Key Focus of the ESG Code of Conduct for Partners

**Environmental protection** - Comply with local environmental protection requirements, including energy conservation, water management and strengthened pollution prevention, and waste management; emphasize biodiversity conservation, and actively respond to the national “carbon peaking and carbon neutrality” strategy by managing carbon emissions effectively.

**Prohibition of child labor** - Comply with the human rights requirements of the International Labor Organization (ILO) and strictly prohibit suppliers from employing or using child labor.

**Prohibition of forced or compulsory labor** - Comply with the human rights requirements of the ILO and strictly prohibit suppliers from employing or supporting the use of forced and compulsory labor.

**Freedom of association and collective bargaining** - Respect the right of employees to form, join, and organize trade unions and engage in collective bargaining.

**Anti-discrimination and harassment** - Do not tolerate or support discrimination based on race, ethnicity, national or social origin, caste, ancestry, religion, disability, gender, sexual orientation, family responsibilities, marital status, trade union membership, political opinion, age, etc.

**Community inclusion** - Keep good communication and partnership with the communities where suppliers operate, respect local culture, traditions, and beliefs, and respect the right to informed consent of communities and residents.

**Conflict minerals** - Do not accept or use “conflict minerals” from conflict areas.

**Employee wage and working hours** - Ensure that the salary paid to employees meet the legal minimum wage standard of the country where the operation is located and cannot be lower than the minimum wage standard of the territory where the operation is located. Ensure that the weekly working hours of the employees meet the requirements of the relevant regulations of the country and territory of operation. Ensure employees’ rest time, and shall not force employees to work overtime; if overtime work is required due to special circumstances, it shall be negotiated with the employees, and overtime expenses shall be paid in accordance with the law.

**Employee health and safety** - Ensure compliance with local occupational health and safety regulatory requirements, provide employees with a safe and healthy work environment, conduct occupational disease prevention, and regularly assess and update emergency response plans. Compliance and business ethics ensure compliance with laws and regulations, strictly prohibit any form of corruption, extortion, embezzlement, and other prohibited conduct, refrain from providing or accepting bribes, including inappropriate benefits or any commercially valuable rewards, and oppose any unfair competition and take measures to protect client information.

**Privacy and information security** - Commit to treating all information obtained during business as confidential, sensitive, and proprietary. Without specific authorization or as required by relevant laws and regulations, information must not be disclosed or conveyed to unauthorized third parties, the public, or the media.

# Actions to address the risks of modern slavery

## Labour and human rights risk management

Theme	Policy and Objective	Mitigation and Management Measure
Prohibition of forced labor and human trafficking	The Human Rights Policy strictly enforces a ‘zero-tolerance’ stance on forced labor, ensuring that every employee enjoys statutory rest days in line with national laws, regulations, and company policies. It also explicitly bans all forms of human trafficking and includes human rights protection clauses in contracts with business partners to ensure their compliance.	<ul style="list-style-type: none"><li>• Develop the Recruitment Management System.</li><li>• Develop and publish the Human Rights Policy on the official website.</li></ul>
Prohibition of child labor	Formulated and implemented the Regulations on Special Protection Management of Minors in accordance with the Law of the People’s Republic of China on Protection of Minors to ensure that minors are not allowed to engage in dangerous and unhealthy or unsafe work, and to protect the rights of minors in accordance with laws and regulations; the Recruitment Management System clearly stipulates that it is prohibited to recruit minors under the age of 18.	<ul style="list-style-type: none"><li>• Confirm the valid identity of applicants through various review methods in stages, such as recruitment, approval, and reporting.</li></ul>
Working hours	Adhere to all applicable laws and regulations on working hours to ensure employees have adequate rest.	<ul style="list-style-type: none"><li>• Establish a dedicated department or appoint personnel to oversee the management of working hours and ensure the effective implementation of related measures.</li><li>• Conduct regular inspections and evaluations of working time management and promptly address identified issues.</li><li>• Encourage employees to participate in oversight, report violations of working hour regulations, and ensure full compliance with statutory working hour rules.</li></ul>
Compensation and benefits	The Employee Handbook specifies that compensation to employees must adhere to all applicable laws and regulations, including but not limited to minimum wage standards, overtime pay, and statutory benefits.	<ul style="list-style-type: none"><li>• Develop management measures for attendance and wages to ensure employees receive legal leave and fair compensation and benefits.</li><li>• Implement an overtime approval system, strictly regulate the duration and frequency of overtime, ensure that overtime complies with legal requirements, and calculate and pay overtime compensation in accordance with national laws and company policies alongside monthly salaries.</li></ul>



# Actions to address the risks of modern slavery

## Labour and human rights risk management

Theme	Policy and Objective	Mitigation and Management Measure
Humane treatment	Strictly prohibit corporal punishment, coercion, or any form of verbal, physical, psychological, or gender disciplinary measures, as well as threats thereof.	<ul style="list-style-type: none"><li>Strengthen training and promotion in all channels, inform employees and managers of relevant disciplinary policies and procedures, and avoid inhumane behavior.</li></ul>
Non-discrimination/ non harassment	Anti-discrimination (Harassment/Retaliation) Behavior Management Policy advocate equal employment relationships and resolutely prevent discrimination in employment relationships based on race, ethnicity, skin color, religious beliefs, sexual orientation, gender, age, physical ability, political orientation, community membership or marital status, and other excuses.	<ul style="list-style-type: none"><li>Strengthen training and promotion through various channels to convey a zero-tolerance attitude towards harassment to employees, popularize relevant laws and regulations, and guide employees on how to deal with harassment.</li><li>Provide smooth channels for reporting and appealing.</li></ul>
Freedom of association	Regulations on the Administration of Freedom of Peaceful Assembly and Association respect employees' rights to freely associate and engage in collective bargaining in a lawful and peaceful manner.	<ul style="list-style-type: none"><li>Standardize the systems of the Employees' Congress and Employee Welfare Committee, and regularly elect employee representatives and trade unions.</li></ul>
Complaints and reports handling	The Human Rights Policy and Code of Business Conduct set out employee reporting channels and relevant policy clauses on whistleblower protection.	<ul style="list-style-type: none"><li>To safeguard the rights and interests of employees who can report through internal audit and supervision channels.</li><li>Upon receiving a complaint, it will be recorded and feedback will be provided within 24 hours.</li></ul>



# Actions to address the risks of modern slavery

## Managing ESG risks in our Chinese supply chain

Global supply chain risks encompass uncertainties in trade policies, higher tariffs, rising transportation costs, fluctuating raw material prices, geopolitical risks, and challenges related to ESG compliance and climate change.

We work with TZE to identify, evaluate and address potential risks through diversified procurement strategies and a comprehensive risk management system. We actively promote sustainable procurement and the green transformation of the supply chain, aiming for a win-win outcome for both environmental and economic benefits. In 2024, TZE's Supply Chain Platform obtained ISO 37301 compliance management system certification, further enhancing the supplier lifecycle management model from admission to elimination.

Among its initiatives, TZE has established and implemented internal systems such as the Supplier Management System and the Supplier Audit Management System to clarify processes for supplier qualification, performance evaluation, and rankings. Additionally, it has developed a traceability management system covering the entire operational process to ensure the safety and traceability of product quality, enabling full supply-chain visibility from modules to silicon ores.





# Actions to address the risks of modern slavery

## Managing ESG risks in our Chinese supply chain

TZE has developed a multi-dimensional ESG risk assessment process for suppliers, identifying key suppliers based on criteria including raw and auxiliary material grades and purchase volumes. These suppliers are then reassessed based on the critical elements of the ESG Code of Conduct for Partners to determine ESG risk levels and generate a risk matrix. Based on this, we have developed management measures by grade, such as signing a code of conduct, regularly auditing and tracking improvement progress, and conducting empowerment training.

**In 2024, a total of 31 high-risk critical suppliers were identified.**

## Risk management measure by grade

Management measures	High Risk Critical Suppliers	High Risk Non-critical Suppliers	Low Risk Critical Suppliers	Low Risk Non-critical Suppliers
Sign code of conduct				
Fill out self-assessment form				
Participate in training				
Desktop audit				
Onsite audit				

# Actions to address the risks of modern slavery

## Focus on traceability measures

In accordance with emerging regulations and best practices, we have implemented measures to trace our supply chain. This involves taking the following steps:

- 01

Identifying the source of raw materials incorporated in products;
- 02

Tracing such raw materials every step from the source through the factories where it is processed until it is delivered; and
- 03

Use of Manufacturer’s Execution System (MES) tracing system as well as transportation documentation every step of the journey.

On the right is a sample of what tracing the MGSi / Polysilicon supply chain looks like, which is a key area of scrutiny in our industry.



13

AI

Aluminium

26.9815386

We provide extra scrutiny to aluminum in addition to MGSi to ensure that none of our aluminum has any inputs from Xinjiang / forced labour





# Actions to address the risks of modern slavery

## Whistleblowing and Grievance Mechanism

### Whistleblowing Channels

**E-mail:** [Whistleblowing.au@sunpowerglobal.com](mailto:Whistleblowing.au@sunpowerglobal.com)

**Address:** SunPower Corporation Australia  
Suite 207/28, Riddell Parade, Elsternwick VIC 3185, Australia

Complaints received by the whistleblower hotline that concern labour / modern slavery issues may be referred to a grievance mechanism. This mechanism will work with internal and potentially external sources and endeavor to comply with international best practices for labour protection in resolving any issues. Actions taken may include remediation actions to protect workers' rights if practicable.

If stakeholders find any supplier that violates that violates our forced labour / modern slavery standards, they can provide feedback via the aforementioned whistleblowing channels. We will strictly keep the whistleblower's personal information confidential, and prohibit any direct or indirect discrimination, harassment, suppression or retaliation against the whistleblower, and effectively protect the whistleblower's legitimate rights and interests. SunPower Australia ensures that all whistleblowing disclosures made in good faith are protected under Australian law, including the Corporations Act 2001 (Cth).

**In 2024, we received no reports of violations in our operations.**





# Measuring effectiveness

## Social audit standards used in China

- System certification (ISO 9001 and ISO 45001)
- Child labor
- Forced and compulsory labor
- Minimum wage
- Discrimination
- Disciplinary behaviors
- Intellectual property
- Employee privacy customs, etc.
- Legitimate requests of different races, beliefs
- Occupational health and safety
- Conflict minerals



## Results of audits in China in 2024

In 2024, TZE completed 16 desktop audits and 132 on-site audits, achieving 100% coverage of high-risk suppliers. During audits, TZE found that 60 suppliers had ESG management issues. TZE promptly worked with these suppliers to develop ESG performance improvement plans, assisted them in improving their ESG management capabilities, and tracked implementation of improvement plans, with a 100% rate of problem rectification. Furthermore, TZE requires that critical suppliers be audited on-site once every three years.

Supplier Assessment	2024 Results
Total number of suppliers passing desktop/on-site audits	148
Percentage of individual critical/high-risk suppliers assessed	65.49%
Number of suppliers identified with significant actual/potential negative impacts	3*
Percentage of suppliers with significant actual/potential negative impacts for which corrective actions/improvement plans have been agreed	100%
Number of suppliers terminated due to significant actual/potential negative impacts	2*

**100% of suppliers that were identified with any negative impact agreed to engage in corrective action plans and capacity development plans.**

\*The three suppliers found to have actual/potential negative impacts identified by TZE are for products TZE makes that are not solar products and therefore not in our supply chain.



# Measuring effectiveness



## 2024 Results

We did not identify any material non-compliance in our direct supply chain in the 2024 Calendar year. As set forth in this document, Tier One suppliers in our supply chain were subject to rigorous reviews throughout the year and numerous internal and customer audits.

Our parent company, TCL Zhonghuan did have three instances of suppliers identified with significant actual / potential negative impacts of which two were terminated. We have verified with TCL that these three suppliers they identified to have actual or potential negative impacts are not in the supply chain for our products sold in Australia.

It should also be noted that our former parent company Maxeon Solar Technologies, Ltd was reported to have panels detained at the border between Mexico and the United States by the United States Customs and Border Patrol (US CBP). We understand that Maxeon continues to maintain that they have never identified any forced labour in their supply chain, which is in line with our findings as set forth above.



# Measuring effectiveness

## 2024 highlights

Our former parent Maxeon Solar Technologies was ranked the number 22 company in the world by Corporate Knights' Global 100 – The World's Most Sustainable Companies Rating – for sustainability based on ESG data reporting that included us during the relevant reporting year, out of more than 6,000 companies rated.

Our current parent company received a prestigious ranking from Ecovadis, a leading rater of corporate supply chains, rating Gold and in the top 2% of all companies globally for its ESG credentials in its operations and supply chains.





# Looking forward 2025



**As we become fully integrated with TCL Zhonghuan during the 2025 calendar year, our SunPower Australia team will become more seamless in our operations.**

We embrace a commitment to continuous improvement and plan to continue to enhance what we are doing to combat any possibility of modern slavery in our operations or our supply chain. Among the areas identified for improvement are the following:

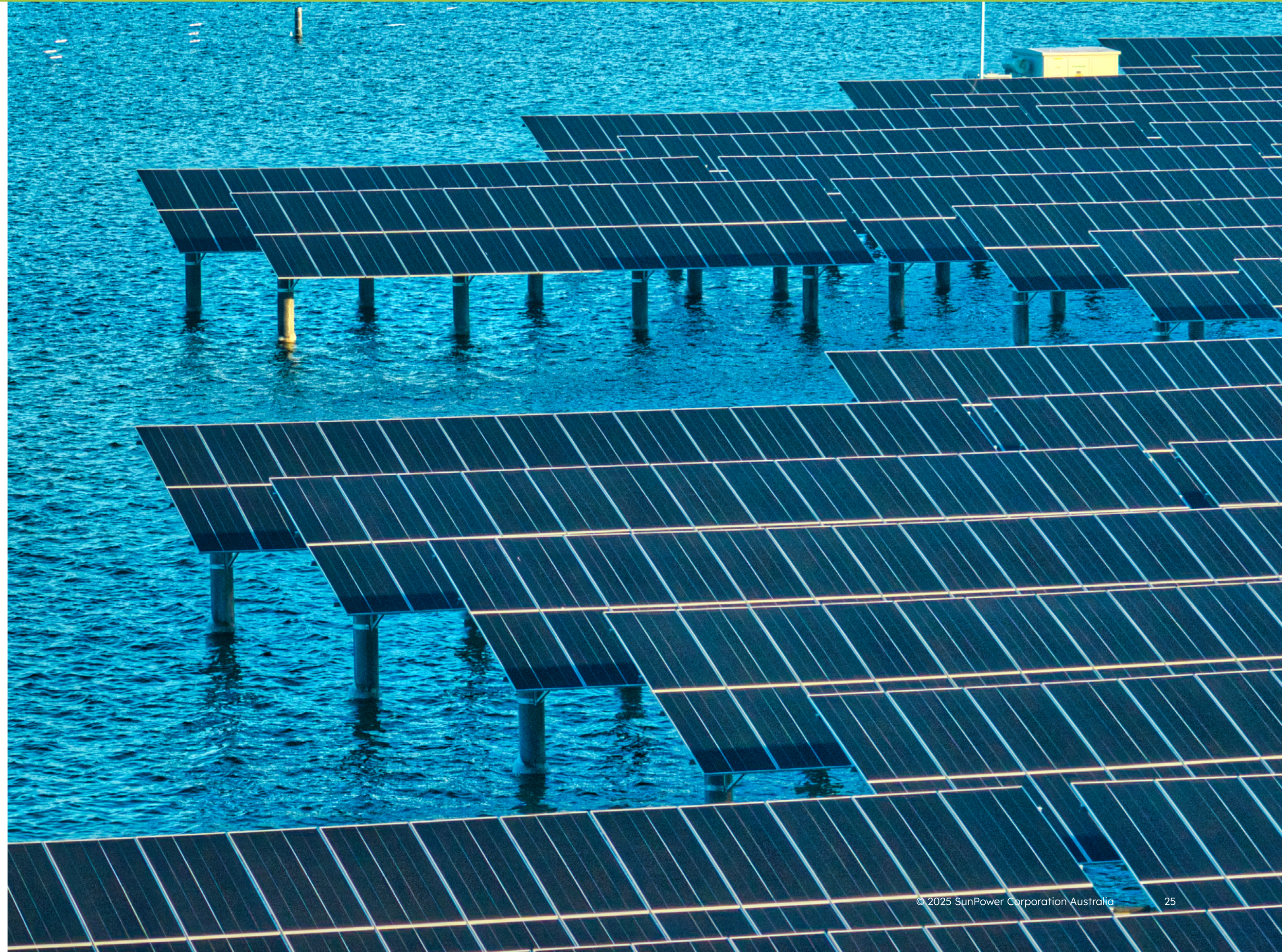
<b>Increased integration with TCL Zhonghuan</b>	As we complete our full integration with TZE in the 2025 calendar year, SunPower Australia’s operations will be optimized to ensure a more seamless experience, enabling us to deliver tailored product offerings for the Australian market and uphold our commitment to exceptional customer service.
<b>Increased Transparency</b>	We aim to be as transparent as possible in our activities and pledge to be more transparent once the new structure is more ingrained.
<b>Continuous Commitment to Improvement</b>	We embrace continuous improvement in our fight against modern slavery. Where high-risk situations are identified, we will work across our value chain to mitigate risks through our multi-step assessment methodology, engaging both internal and external specialists as needed for assessment and remediation.



# Looking forward 2025

This Modern Slavery Statement has been prepared in accordance with the Australian Modern Slavery Act 2018 (Cth). It includes descriptions of actions taken by SunPower Corporation Australia during the relevant reporting period, as well as intended future actions to assess and address modern slavery risks in our operations and supply chains.

While we aim to provide accurate and complete information, some forward-looking initiatives and commitments may be subject to change as our business and supply chains evolve. This statement is based on information available to SunPower Corporation Australia as at 23rd June 2025, and we will continue to review and update our practices and disclosures in future reporting periods as required.





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We are thrilled that SunPower Australia is now part of the TCL Zhonghuan platform with its industry leading products and demonstrated commitment to maintaining our high ethical standards. ”

**Stephen Straughair**

SunPower Australia General Manager

For any questions on this Report, please contact Stephen Straughair at [stephen.straughair@sunpowerglobal.com](mailto:stephen.straughair@sunpowerglobal.com)

To find out more about our ESG commitments, visit our webpage <https://en.tzeco.com/esg/>.

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