

Modern Slavery Statement 2025

SunPower Corporation
Australia Pty Ltd

TCL | SUNPOWER

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Aligned with the seven mandatory reporting criteria of the Modern Slavery Act 2018 (Cth)

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About this statement

This is our fifth 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 “TCL SunPower Australia”). Our corporate address is: Suite 207/28 Riddell Parade, Elsternwick, 3185, Victoria, Australia. Our customer service number is: 1800 985 638. TCL 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 2025 to 31 December 2025. 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. TCL SunPower Australia operates using local Australian policies as well as 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 from the British Standards Institution (BSI) in March 2025, a testament of our commitment.

Approval and Signature

This Statement was approved by the board of directors of SunPower Corporation Australia Pty Ltd (ACN 009 066 380), being its principal governing body, on 26 June 2026. It was signed by Enshi Zhang (known as Frank Zhang), Director, as a responsible member of the reporting entity, on 26 June 2026.

Third Party Review

To support the accuracy and integrity of this Statement, TCL SunPower Australia engaged an independent, third-party legal consulting firm to assist in its preparation and to review relevant claims and internal documentation.

Feedback

We value all feedback. If you have any questions or comments on this statement, please forward them to: salesaustralia@sunpowerglobal.com



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Message from our director

The year 2025 marked a pivotal moment for SunPower Corporation Australia Pty Ltd. Following a period of significant transformation, TCL SunPower Australia formally incorporated as a new energy division within TCL Zhonghuan (TZE) in March 2025, signaling the beginning of a new chapter in our company's evolution.

As the solar industry continues to grow and mature, our commitment to the highest standards of integrity, transparency and responsible business conduct has never been stronger. While TCL SunPower integrates more closely into the TZE ecosystem, we remain steadfast in our responsibility to operate ethically and to uphold human rights across our operations and supply chains.

As a subsidiary of a global business operating within a complex and interconnected supply chain, we acknowledge the ongoing risk of modern slavery within our sector. Addressing these risks requires vigilance, collaboration and continuous improvement. We believe meaningful progress can only be achieved through active engagement with our workforce, suppliers and broader stakeholders.

Respect for human rights must remain central to every organisation's strategy as a core principle. This is equally a matter of ethics and sound economics. Supply chains that are free from forced labour, and where people and businesses can thrive quitably, are essential to building resilient global value chains and a Sustainable global economy.

This Modern Slavery Statement reflects our values, policies and commitments, and demonstrates our determination to lead responsibly within our industry. It also reinforces our pledge to uphold the principles of the United Nations Global Compact. As of April 2026, SunPower Corporation Pty Ltd is an official member of the UN Global Compact Australian Network (only 2 solar panel manufacturers are members as of April 2026), complementing our parent company TCL's long-standing membership and commitment to UN Global Compact. As a testament to our commitment, we have several new policies in for conflict minerals, supply chain responsibility, and grievance remediation.

“Respect for human rights must remain central to every organisation's strategy as a core principle. This is equally a matter of ethics and sound economics.”

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Message from our director

We understand that the fight against modern slavery is ongoing and demands sustained action, accountability and continuous improvement. As TCL SunPower Australia continues to expand rapidly within the Australian market through SunPower and TCL Solar branded modules, transparency and robust reporting across our operations are more important than ever. As a leading contributor to Australia's energy transition and its ambition to achieve 82% renewable energy by 2030, we recognize our responsibility to lead by example.

This Statement submitted voluntarily, is a reaffirmation of our commitment to transparency, ethical leadership and a future in which all individuals are free from exploitation.



Frank Zhang

Enshi (Frank) Zhang
Director, SunPower Corporation Australia Pty Ltd.
President of Global Sales and Marketing, TCL Zhonghuan

UN Global Compact Network Australia

TOP SOLAR COMPANY #3 FASTEST GROWING PANEL TCL SUNPOWER AUSTRALIA 2026



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2025 marked critical ESG milestones

Our parent company, TZE, continuously works to enhance its ESG practices, strengthening them with comprehensive frameworks and action plans. In 2025, TZE achieved several key milestones and received broad recognition from leading and reputable rating agencies, highlighting its leading position in the PV industry.

In October 2025, our MSCI ESG Rating was upgraded **from BBB to A,** ranking among the Global Leaders in the photovoltaic industry.

In November 2025, our CDP Global Environmental Information Disclosure Questionnaires for both Water Security and Climate Change received **the management level (B) score.**

In November 2025, we received a score of **65** in the S&P Global 2025 CSA Rating.

In 2025, we were rated **AAA** by the Shenzhen Stock Exchange's CNI ESG Index.

In August 2025, our Wind ESG Rating was upgraded **from A to AA**.

In March 2026, TCL ZHONGHUAN ENERGY TECHNOLOGY (JIANGSU) CO LTD earned a **Silver Medal,** a recognition awarded to the Top 15% of companies assessed by EcoVadis in the 12 months prior to the medal issue date.

In May 2026, TZE was awarded the **TUV Rheinland Certificate SA8000 (Social Accountability 8000)** which is an internationally recognized certification standard for social responsibility in the world of work. The SA8000 advocates compliance with internationally recognized labor rights as set out in the UN Declaration of Human Rights, conventions of the International Labor Organization (ILO) and other international human rights standards and national labor law.



[1]Detailed information of this rating can be accessed by copying the link and viewing it https://recognition.ecovadis.com/GS-SHzsqjECld3Oiupwo9w

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Assessing modern slavery risks

Our operations

In 2025, TCL SunPower Australia employs 19 staff located in Victoria and New South Wales. Management in Australia leads the sale of goods into the Asia-Pacific region and occasionally other markets. We have a local 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 (6 staff across VIC and NSW), Marketing (3 across VIC), Finance Sales Operations & Administration (3 staff in VIC), Legal (1 staff in VIC), Training and Product Engineering (2 staff across VIC and NSW) and Fulfilment & Customer Care (1 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). Our brands include the SunPower Maxeon IBC, SunPower Performance TOPCon, SunPower Reserve home energy storage system, TCL Solar TOPCon and TCL Solar Back Contact manufactured by Maxeon Solar Technologies, Ltd (SunPower Maxeon IBC) and Huansheng Photovoltaic (Jiangsu) Co., Ltd (“HSPV”) and Huansheng Solar New Energy (“HSNE”) (SunPower Performance TOPCon, TCL Solar TOPCon and TCL Solar Back Contact) 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 in Australia

To assess the risk of modern slavery in our operations, we complete an initial desktop assessment. This includes 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 come to our attention (through consultations with specialist third-party service providers, media, grievance mechanisms, etc.). We take reference from the Global Slavery Index while assessing the risks of modern slavery in the countries where we operate or 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 entirely 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 solar modules 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. As our supply chain evolves, our focus will evolve, and in this Statement you will see we also cover Saudi Arabia, which is an emerging risk for our future supply chain.

Our storage solution partner

We also sell battery systems produced by a third party as part of our SunPower One offering. We have conducted due diligence on the company (Alpha ESS), 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.

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2025 product breakdown

For 2025 we are publishing, for the first time, a per-product traceability breakdown across the four solar module product lines sold into Australia.



SunPower Maxeon IBC

Manufacturer: Maxeon Solar Technologies, Ltd (related entity under TCL Zhonghuan ownership), Philippines.

Polysilicon: Maxeon's historical sources include Hemlock (US) and Wacker (Germany), continuing under post-March 2025 ownership.

Modern slavery framework: Maxeon Global Human Rights Policy and Whistleblower Policy (multi-language, third-party managed) remain in force; supplier auditing under Maxeon's existing programme.



SunPower Performance TOPCon

Manufacturer: Huansheng Photovoltaic (Jiangsu) Co., Ltd (HSPV), Yixing, Jiangsu.

Upstream: Full vertical integration through TCL Zhonghuan entities (polysilicon Qinghai Lihao/Qinghai As Semiconductor; ingots Inner Mongolia Zhonghuan/Ningxia Huanou; wafers Yixing, Tianjin, Hohhot, Yinchuan).

Traceability: MES tracking, Dec 2024 CEA Phase 2B Chain of Custody, Dec 2025 'Crystal Clear' supplier map.

Social audit: May 2025 4-Pillar SMETA audit (Sedex ZAA600061023).



TCL Solar TOPCon Half-cut

Manufacturer: Huansheng Solar New Energy (HSNE) / Huansheng New Energy (Tianjin & Inner Mongolia).

Upstream: Same TZE vertically integrated supply chain as SunPower Performance TOPCon.

Traceability: Same MES, CEA and SMETA coverage.

Note: TCL Solar TOPCon and SunPower Performance TOPCon share the same upstream supply chain; the brand difference reflects product positioning, not a different factory route.



TCL Solar Back Contact

Manufacturer: Joint venture between Huansheng Photovoltaic (Jiangsu) Co., Ltd (HSPV) and AIKO Solar, Meishan, Sichuan.

Modern slavery framework: AIKO is a separate listed company that publishes its own modern slavery statement and operates its own Supplier Code of Conduct, Labour Policy, Audit Schedule, and grievance channels. AIKO is a Sedex member with RBA VAP Silver (twice) and EcoVadis Silver.

Our due diligence: Based on our desktop review of AIKO's published disclosures, AIKO operates an A-to-D supplier grading system with annual on-site audits of key suppliers (covering operations, EHS and process control) and reports 100% signing coverage of social responsibility framework, NDA and integrity agreements across its supplier base in 2024. AIKO has established traceability for all silicon wafer suppliers and reports 100% traceability coverage for silicon rods and silicon materials, with a focus on labour and human rights compliance.

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Our enhanced Australian policies

TCL SunPower Australia has adopted three new Australia-specific policies that complement TCL Zhonghuan's group-wide framework and tailor our approach to the Australian regulatory and operational context. All three policies apply to our direct operations, our Tier 1 suppliers, and critical Tier 2 suppliers. They are overseen by our Australian Director, our Senior Legal Counsel & Company Secretary, our ANZ ESG Leads, and our HQ liaison at TCL Zhonghuan.

Supply Chain Responsibility Policy

Establishes how we assess supplier risk and engage suppliers on labour, human rights, and environmental standards.

Requires all suppliers to:

- Complete our annual Supplier Self-Assessment Questionnaire
- Maintain documented labour, health and safety, grievance and human rights policies
- Cooperate with third-party audits
- Implement corrective action plans where issues are identified
- Cascade these expectations to sub-suppliers

Suppliers are risk-categorised based on sourcing geography, labour intensity, prior audit findings, transparency, and governance maturity.

Conflict Minerals Policy

Aligns specifically with TCL Zhonghuan's Conflict Minerals Policy (April 2024). Addresses the 3TG minerals (tin, tungsten, tantalum, gold) and other critical materials including polysilicon, metallurgical-grade silicon, and aluminium.

Requires all Tier 1 suppliers to:

- Confirm that products do not contain minerals from high-risk areas
- Identify smelters and refineries in their supply chain
- Cooperate with third-party verification
- Cascade these requirements to sub-suppliers

Where risks are identified, we work with suppliers on remediation; persistent non-compliance may result in contract termination.

Grievance and Remediation Policy

Establishes confidential and accessible reporting channels for workers, contractors, and other stakeholders to raise concerns about forced labour, child labour, wage and hours issues, discrimination and harassment, unsafe conditions, or retaliation.

Reporting channels:

- Email: whistleblowing.au@sunpowerglobal.com
- In-person to facility management
- Anonymous online form
- Third-party hotline

Receipt acknowledged within 2 business days; formal investigation begins within 5 business days; typical completion in 30 to 60 days. Anonymous grievances processed with the same urgency as named reports. Retaliation against reporters or witnesses is strictly prohibited.

The full policies are available on request and will be published on our website following the release of this Statement.

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How we govern modern slavery risk

Australian oversight, plugged into TZE's group-wide framework.

TZE Group Governance



Decision-making

Strategy & Sustainable Development Committee



Supervisory

Sustainability Steering Committee



Management

Sustainable Development Office
Supply Chain Management Centre



Execution

Module owners across procurement, audit and ESG

TCL SunPower Australia Oversight

Board of Directors, SunPower Corporation Australia Pty Ltd

Approves this Statement as the Company's principal governing body.

Australian Director

Signs this Statement as a responsible member; sets the local modern slavery agenda; reports to the TZE board.

Senior Legal Counsel & Company Secretary

Policy ownership; coordination with TZE legal

ANZ ESG Leads

Day-to-day operation of our three Australia-specific policies; supplier engagement; SAQ administration; ESG Reporting and Governance

HQ liaison at TZE

Channel into group audit, traceability and supplier programmes

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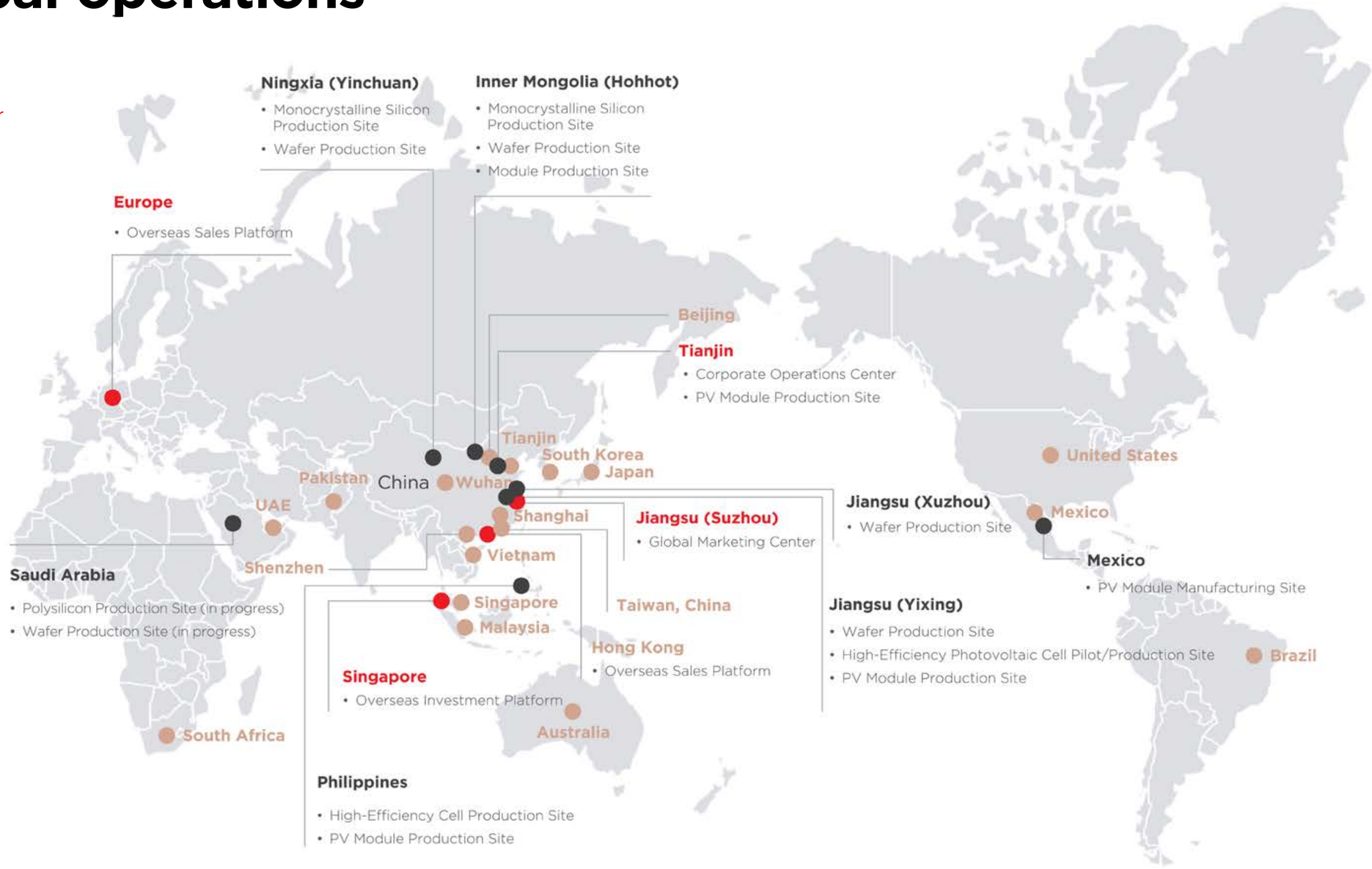
TZE's global operations

- Production Site
- Headquarters / Marketing Center
- Globalisation Marketing Network



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Critical minerals in our supply chain

Where the inherent risk sits in our upstream materials

As a solar manufacturer, we rely on a small number of critical mineral inputs. Industry-wide attention to modern slavery in this sector concentrates on three areas: 3TG conflict minerals, metallurgical-grade silicon, and aluminium. Our 2025 due diligence has prioritised all three.



3TG

Tin · Tungsten · Tantalum · Gold

Inherent risk

Often extracted in conflict zones, with documented child and forced labour. The most prominent example is the eastern Democratic Republic of the Congo.

Our response

TZE Conflict Minerals Policy aligned with OECD Due Diligence Guidance; 100% of suppliers have signed the Commitment Letter on Non-use of Conflict Minerals; RMI-CMRT and RMI-EMRT traceability investigations completed.



MGSi

Metallurgical-grade silicon

Inherent risk

Industry-wide allegations centre on forced labour in Xinjiang. MGSi is processed into polysilicon and is foundational to every solar cell.

Our response

We do not source MGSi from Xinjiang. None of our suppliers source from Xinjiang to the best of our knowledge following the due diligence described in this Statement. Traceability through TZE's MES system.



Al

Aluminium frames

Inherent risk

Frame aluminium is a high-volume input and the area of greatest contemporary regulatory scrutiny in the United States and Europe, particularly around Xinjiang-linked smelting capacity.

Our response

All four frame suppliers confirmed via 2025 SAQ that they do not source from Xinjiang or other elevated-risk regions. SMETA audits on file for the two largest. Bauxite to smelter traceability progressing under our 2026 Digital Passport.

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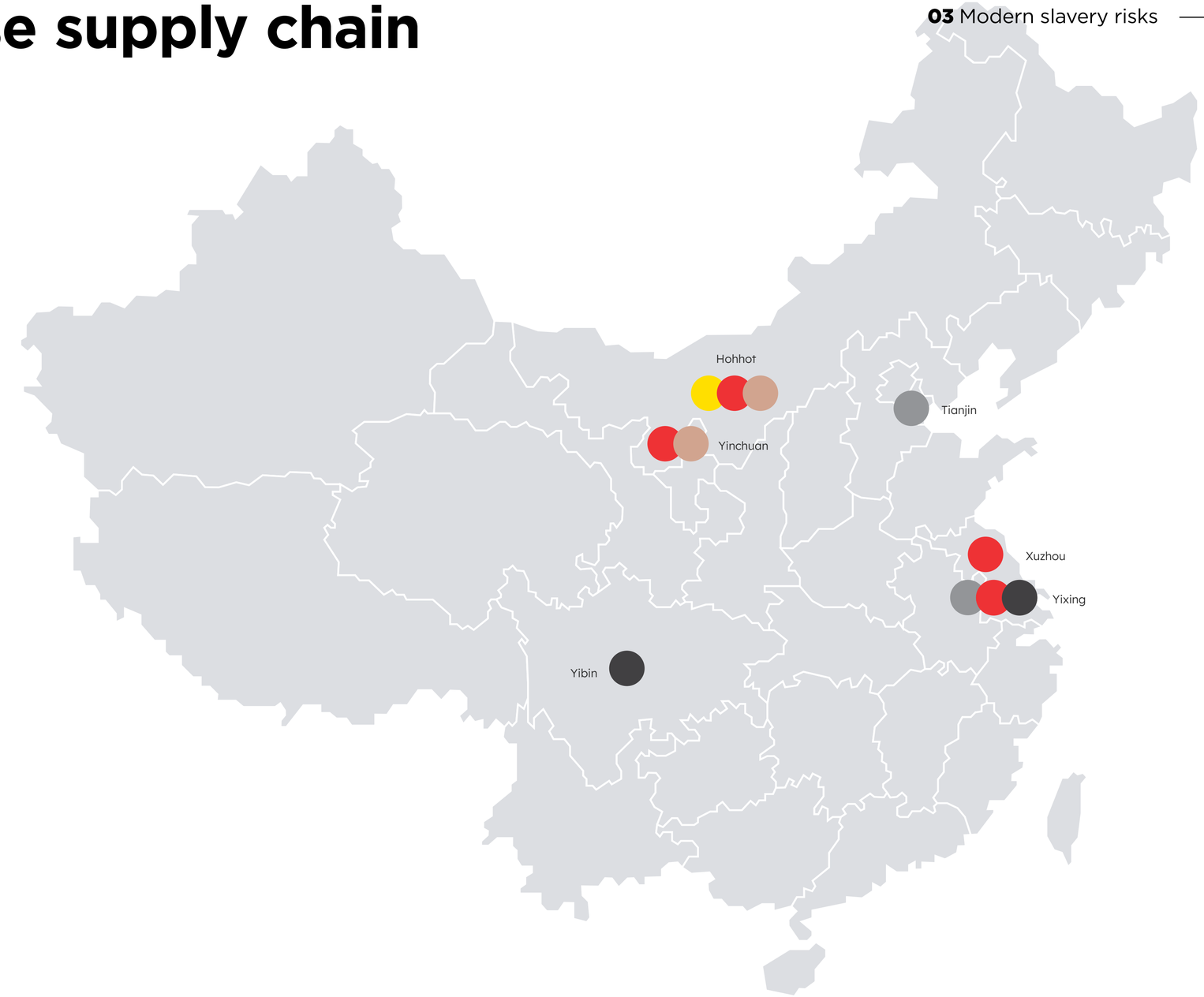
Focus on our Chinese supply chain

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. Further details on traceability can be directly requested through TCL SunPower Australia entity.

None of these suppliers are in Xinjiang, UAR.

- Monocrystalline silicon
- Ingot
- Wafer
- Cell
- Module



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TZE risk management

Relying on the Supplier Management System, Risk and Opportunity Management System, and Supplier ESG Information Evaluation Form; TZE has constructed a supplier ESG risk management system. This system covers dimensions such as environmental compliance, labor and human rights, occupational health and safety, business ethics, and compliant operations, encompassing the entire supplier process from admission, audit, and improvement to exit.

Supplier Admission: Since 2022, TZE has required new performing suppliers to simultaneously sign the ESG Code of Conduct for Partners when executing business contracts. A violation of this code by a supplier may lead to the termination of cooperation. In 2025, no suppliers were found to have had their business suspended for violating the ESG Code of Conduct for Partners.

Supplier Audits: Through a combination of written and on-site audits, we identify, assess and manage supplier ESG risks on a graded basis, using the assessment results as an important basis for supplier admission, continued cooperation and performance evaluation. In 2025, TZE identified a total of 28 significant high-risk suppliers.

ESG risk-graded management measures

Management measure	High-Risk Critical	High-Risk Non-critical	Low-Risk Critical	Low-Risk Non-critical
Sign code of conduct	✓	✓	✓	✓
Fill out self-assessment form (SAQ)	✓	✓	✓	✓
Participate in training	✓	✓	✓	✓
Desktop audit	✓	✓	✓	
Onsite audit	✓	✓		

Excerpt from TCL Zhonghuan's ESG audit content

Environmental Governance

- Management System Certification
- Circular Use of Resources and Energy
- Green Design or Production Processes
- Use of New Energy
- Conflict Minerals
- Use of Hazardous Substances
- Management of Waste Gas, Waste Water, and Solid Waste
- Emission Reduction Action Plan
- Product Carbon Footprint
- Greenhouse Gas Accounting
- Setting of Environmental Targets

Social Responsibility

- Child Labour
- Forced Labour
- Employee Remuneration
- Discrimination/Disciplinary Action
- Intellectual Property Protection
- Privacy Protection
- Occupational Health and Safety
- Human Rights Due Diligence

Corporate Governance

- Improvement of Management Systems
- Corruption and Bribery
- Business Monopoly
- Compliance in Equity Division
- Business Ethics

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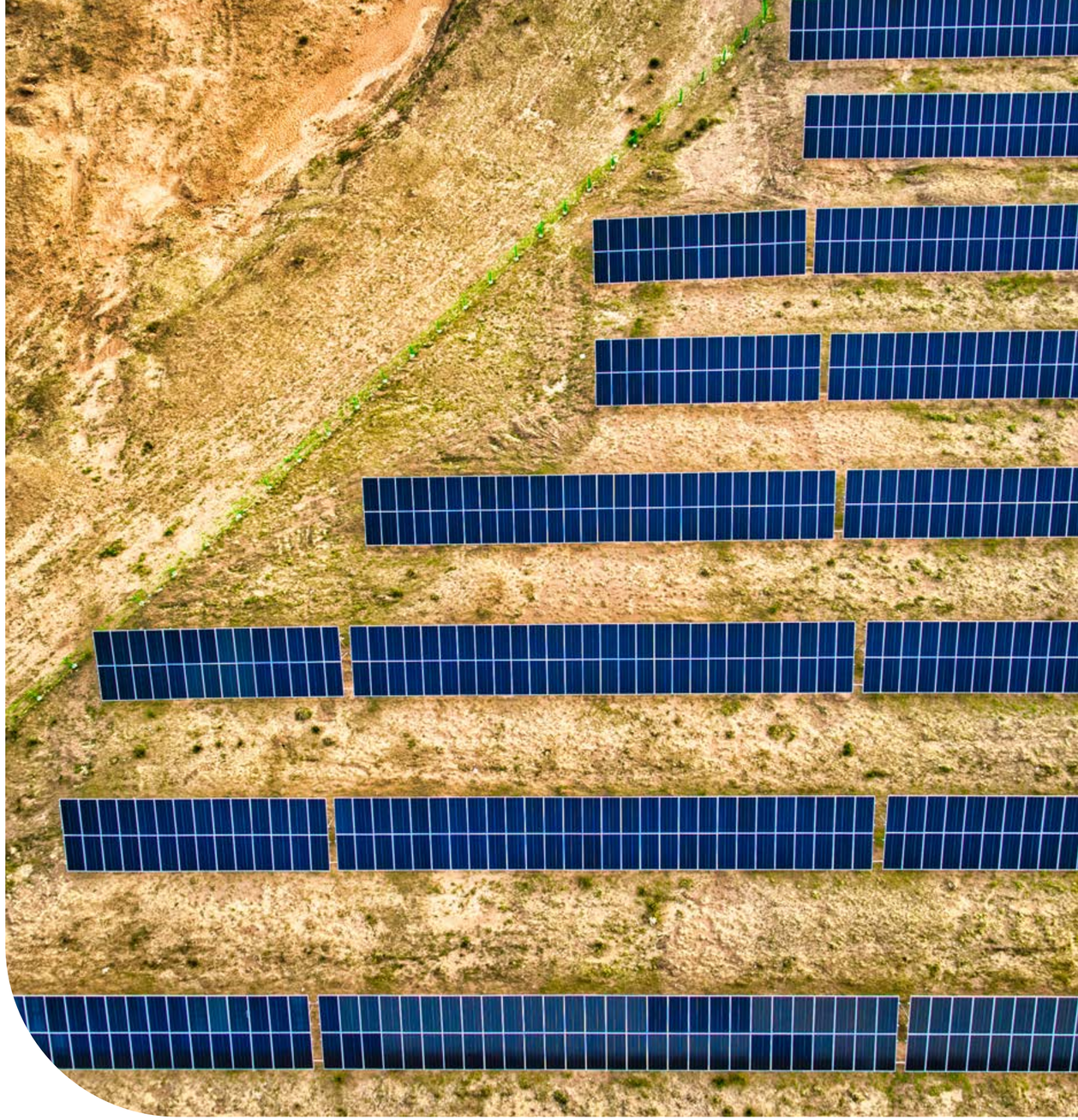
Actions to address the risks of modern slavery

Managing ESG risks in our Chinese supply chain

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.

TCL has a supplier in its chain that is a subsidiary of an Indonesian company operating in a free trade zone in Nigeria. We recognise that this combination of jurisdiction and operating environment can present elevated modern slavery and labour rights risks, and we consider those risks and apply our standards and due diligence to this supplier accordingly.



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Supplier Code of Conduct

Labour Rights Protection

- Explicitly prohibits child labour and upholds the rights to freedom of association and collective bargaining;
- Anti-discrimination and harassment; committed to paying employees a living wage;
- Prohibits forced overtime, ensuring working hours comply with relevant regulations and the requirements of the International Labour Organisation (ILO).

Prohibition of Forced Labour

- Does not use or support the use of forced or compulsory labor, and does not collect deposits or security payments, or withhold personal identification documents.

Conflict Minerals

- Complies with applicable domestic and international laws, regulations, principles, and initiatives concerning the prohibition of conflict minerals, as well as TCL Zhonghuan's *Conflict Minerals Management Policy*

Occupational Health and Safety

- Complies with the laws and regulations of the host country and region;
- Establishes mechanisms for the prevention, management, and reporting of occupational injuries and diseases;
- Provides work-related injury insurance for employees in accordance with the law; and conducts occupational hazard factor testing and health examinations.

Community Integration

- Maintains good community communication and cooperative relationships;
- It encourages partners to actively participate in the activities of the communities in which they operate.

Environmental Responsibility

- Complies with applicable environmental laws, regulations, and emissions standards, and implement environmental management mechanisms;
- Strengthens water resource management, the standardised disposal of waste gas and waste, and the hierarchical control of chemicals and hazardous substances;
- Places importance on ecological environments, biodiversity, and land protection.

Anti-Bribery and Anti-Corruption

- Prohibits all forms of commercial bribery or improper transfer of benefits, and report any related violations promptly through the Company's audit channels.

Anti-Money Laundering

- Strictly complies with all applicable laws and regulations and fully implement anti-money laundering management requirements.

Compliance Management

- Encourages partners to establish their own compliance management systems;
- Ensures employees fully understand and comply with the internally established business code of conduct through internal communication and training.

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TZE’s commitment to a responsible supply chain

TZE continues to strengthen its end-to-end supply chain governance to ensure efficient and stable operations. It embeds responsible sourcing across the entire supplier lifecycle, improving environmental, social, and compliance performance through clear policies, risk identification, and tiered response measures.

TZE also enforces strict conflict minerals controls, carrying out ongoing due diligence and traceability to reduce compliance risks. It promotes low-carbon development by advancing environmentally responsible management and chemical compliance across the supply chain.

In addition, TZE standardises settlement practices and provides grievance mechanisms to safeguard the rights and interests of SMEs and partners, helping build a more responsible and sustainable supply chain.

Governance Structure

In 2025, TZE implemented a profound organisational optimization of the Supply Chain Management Centre, successfully establishing six major functional modules: strategic planning, process management, ESG enablement, digital decision-making, business collaboration, and specialized procurement. This has clarified the responsibilities and collaborative logic at each level. The governance structure is represented as below:



TCL Zhonghuan supply chain management structure

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Supply chain management system and strategy

TZE has established and implemented an ESG Code of Conduct for Partners, assessed the ESG risk level of suppliers and formulated graded management measures. TZE strictly reviewed and proposed improvement plans based on risk results, enhanced the sustainable development capabilities of suppliers, and actively promoted the construction of a low-carbon 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 2025, TZE Supply Chain Management Platform integrated sustainable procurement management into its full lifecycle procurement practices. By adhering to strict internal standards and achieving ISO 20400 and GB/T 33635-2017 certifications, it ensures professional, transparent, and effective management while building a responsible, sustainable, and traceable supply chain.

Building a Compliant and Transparent Responsible Supply Chain System

Strengthening the management of the Supplier Code of Conduct, advancing due diligence on conflict minerals and human rights compliance management, and enhancing supply chain transparency and traceability.

Enhancing Supply Chain Resilience and Risk Response Capabilities

Establishing a classified and tiered management mechanism, strengthening risk identification and early warning capabilities, and improving the supply chain's ability to respond to emergencies and market fluctuations.



Responsible Supply Chain Strategy

Creating a Low-Carbon Supply Chain

Promoting low-carbon procurement and product design, encouraging suppliers to conduct carbon emissions accounting and implement reduction practices, and collaboratively advancing the low-carbon transformation of the industrial chain.

Fostering Collaboration, Mutual Benefit, and Capacity Building

Supporting the capacity enhancement of small and medium-sized enterprises, improving grievance and communication mechanisms, and promoting the formation of long-term, stable partnerships.

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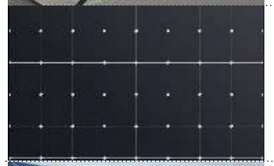
End-to-end traceability for solar PV manufacturing

	Value Chain Stage	What TZE Tracks	Business Value
	Raw Materials & Polysilicon	Supplier ID, origin, ESG and conflict-minerals certificates, batch numbers	Proof of responsible sourcing and regulatory compliance The specific proof for each product is accessible through the Australian ESG and Product team.
	Wafer Manufacturing	Furnace runs, ingot and wafer lots, yield and defect data	Root-cause analysis and process optimisation
	Cell Production	Process route, production line, test results and efficiency	Early detection of quality or degradation risks
	Module Assembly	Serial numbers, full bill of materials, assembly date and site	Targeted recalls and warranty assurance
	Customer & Compliance	Traceability reports, proof of origin, ESG documentation	Faster audits and increased customer trust

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Ethical sourcing and low-carbon practices

Responsible Sourcing of Minerals

TZE embeds a strict “no conflict minerals” policy within its responsible sourcing approach, ensuring compliance with global regulations and sourcing only verified, non-conflict minerals.

It strengthens transparency and traceability, particularly in its silicon supply chain, through systematic due diligence and alignment with international standards, supporting responsible sourcing and building stakeholder trust.

As of the end of the reporting period:

100% of suppliers had signed the Commitment Letter on Non-use of Conflict Minerals

9 suppliers involved in conflict minerals passed the RMI-CMRT traceability investigation

Another **5** passed the RMI-EMRT traceability investigation. There were no instances of sourcing or using materials from conflict regions.

Low-Carbon Procurement

TZE integrates sustainability principles across its entire supply chain, driving a shift toward low-carbon, efficient, and responsible operations. It supports suppliers through coordinated initiatives spanning production, packaging, logistics, and recycling to improve overall environmental performance. At the same time, it enforces strict controls on chemical and product compliance by embedding REACH and RoHS requirements into supplier selection, evaluation, and daily management. Through audits, traceability systems, and rigorous monitoring of high-risk materials, TZE ensures compliance, reduces environmental risks, and strengthens supply chain accountability.

Sustainable Management: The Company incorporates environmental protection, resource efficiency and operational compliance requirements into its supplier admission and assessment system, encouraging suppliers through institutional constraints and process management to establish and improve their environmental management systems and thereby raise their levels of standardised and regulated management.

Low-carbon Production: The Company encourages suppliers to accelerate equipment upgrades and process optimization, promotes the application of energy-saving and emission-reduction technologies and clean production practices, and facilitates energy efficiency improvements and emission intensity reductions in the manufacturing process.

Recycled Packaging and Reduced-Carbon Logistics: The Company continuously optimizes material packaging solutions, promotes the reduction, reuse and recycling of packaging materials, and reduces energy consumption and carbon emissions in the logistics process by shortening transport distances and improving logistics efficiency through a localised and regionalised supply chain layout.

Circularity: The Company encourages upstream and downstream supply chain partners to strengthen collaboration on resource recovery and reuse, thereby improving resource utilization efficiency throughout the entire lifecycle of raw materials and products.

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Implementation of corrective actions

TZE embeds ESG performance into supplier evaluation, incentives, and partnership decisions, rewarding high-performing suppliers with scoring advantages, greater business opportunities, and long-term collaboration. It strengthens relationships by supporting suppliers that actively improve and meet audit requirements, while linking ESG outcomes directly to partnership stability.

A clear and rigorous exit management framework ensures accountability: suppliers with strong ESG performance are allocated greater cooperation share, while those with weaker performance are required to implement corrective actions and are subject to ongoing assessment. Suppliers failing to meet required standards risk reduced cooperation or potential exit. During the reporting period, no non-compliant suppliers were identified through these processes. This demonstrates the effectiveness of TZE's approach in driving continuous improvement and maintaining a resilient, responsible supply chain.

Supplier Exit

If a supplier fails to meet rectification requirements within the specified period, suspends supply for more than one year, has significant quality issues, or fails to meet rectification standards, TZE will issue a Notice of Procurement Suspension in accordance with its procedures to place its cooperation eligibility under restricted management.

For suppliers from whom procurement has been suspended for over two years, TZE will issue a Notice of Disqualification from Supply to terminate their supply eligibility.

For suppliers that commit serious violations, such as breaching the ESG Code of Conduct for Partners, TZE will directly terminate the cooperation in accordance with laws and regulations.

For suppliers subject to the Supplier Blacklist Management System, measures such as being blacklisted for two years or a permanent ban on cooperation will be taken based on the severity of the violation.



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Indicators and 2030 targets

TZE group indicators that anchor TCL SunPower Australia's effectiveness reporting

2025 supplier base

Total Tier-1 suppliers	1,314
Domestic (China)	1,233
Overseas	81
Critical Tier-1 suppliers	141
Grade A suppliers	141
Grade B suppliers	278
Grade C suppliers	895
% spend on critical Tier-1	70%+

By 2030, TZE group targets

100%	Audit coverage for high-risk critical suppliers via desktop or on-site audit
100%	ESG assessment coverage for key suppliers
100%	Coverage for core suppliers in sustainable development training
90%+	Procurement staff annual participation in supply chain ESG training
100%	Suppliers with significant negative impacts supported through corrective action and capacity building

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2025 results

Reporting criterion 5, how we assess the effectiveness of our actions.

61%

On-site audit

100% audit coverage

39%

Desktop audit

100% audit coverage

100%

Conflict minerals commitment

Suppliers signing TZE Non-use Letter

190

New suppliers screened

Special admission assessments, 100% coverage

236

Suppliers passed desktop / on-site

Total across the TZE group in 2025

35

ESG Issues identified

100% rectification rate

What this tells us

Direct supply chain.

We did not identify any material non-compliance in our direct supply chain during 2025. Tier 1 suppliers were subject to rigorous review through internal and customer audits.

Parent group.

Across the wider TZE group, supply chain compliance issues were identified at 35 suppliers during 2025 audits; the rectification rate for those issues reached 100%. We have verified with TZE that none of the suppliers identified with significant actual or potential negative impacts are in the supply chain for products sold in Australia.

How to read our 2025 supplier numbers

Three numbers appear in this Statement that describe different populations of TZE group suppliers. They are not inconsistent, but they measure different things.

1,314 is the total number of Tier-1 suppliers to the TZE group in 2025 (1,233 domestic, 81 overseas). This is the full population.

141 is the number of those Tier-1 suppliers classified as critical based on raw material grade, purchase volume, and substitutability. The 2024 figure of 31 reflected a narrower classification methodology; the 2025 increase is a methodological refinement rather than a deterioration in supplier performance.

28 is the number of suppliers within the critical population identified as high-risk following the 2025 graded ESG risk assessment.

35 is the number of TZE group suppliers (across all tiers and risk grades, not limited to the 28 above) where sustainability or compliance issues were identified during 2025 audits. All 35 were brought under corrective action plans, and rectification reached 100% within the reporting period.

None of the 35 supply product into Australia. This has been verified with TZE.

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2025 supplier self-assessment questionnaire

SAQ rollout from cells, aluminium to glass suppliers, feeding our Australian product

In 2025 we issued our first TCL SunPower Australia SAQ to fourteen suppliers across three critical upstream categories. Responses are summarised in aggregate below.
All fourteen confirmed no sourcing from Xinjiang or other elevated-risk regions and no allegations, investigations or NGO reports relating to forced labour in the past three years.

Category	Suppliers	Xinjiang sourcing	Modern Slavery/ Forced Labour Policy	Code of Conduct	Grievance Mechanism	Recent 3rd-party social audit
Solar Cells	5	0	3 of 5	3 of 5	3 of 5	2 of 5 within 24 months
Aluminium frames	4	0	2 of 4	3 of 4	3 of 4	2 of 4 within 24 months
Solar PV glass	5	0	2 of 5	5 of 5	5 of 5	1 of 5 within 24 months

What we take from this: Xinjiang exposure and recent forced-labour incidents are not features of the supply chain feeding our Australian product. Quality and environmental certifications are uniformly strong. The uneven coverage is in written modern-slavery policies and recent third-party social audits. Our 2026 priority is to bring all key suppliers under a recognised social audit (SMETA, RBA-VAP or equivalent) within a 24-month cycle, and to formalise written modern slavery policies where not already in place.

We are able to provide the detailed breakdown of the above SAQs, on request.

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Whistleblowing and grievance mechanism

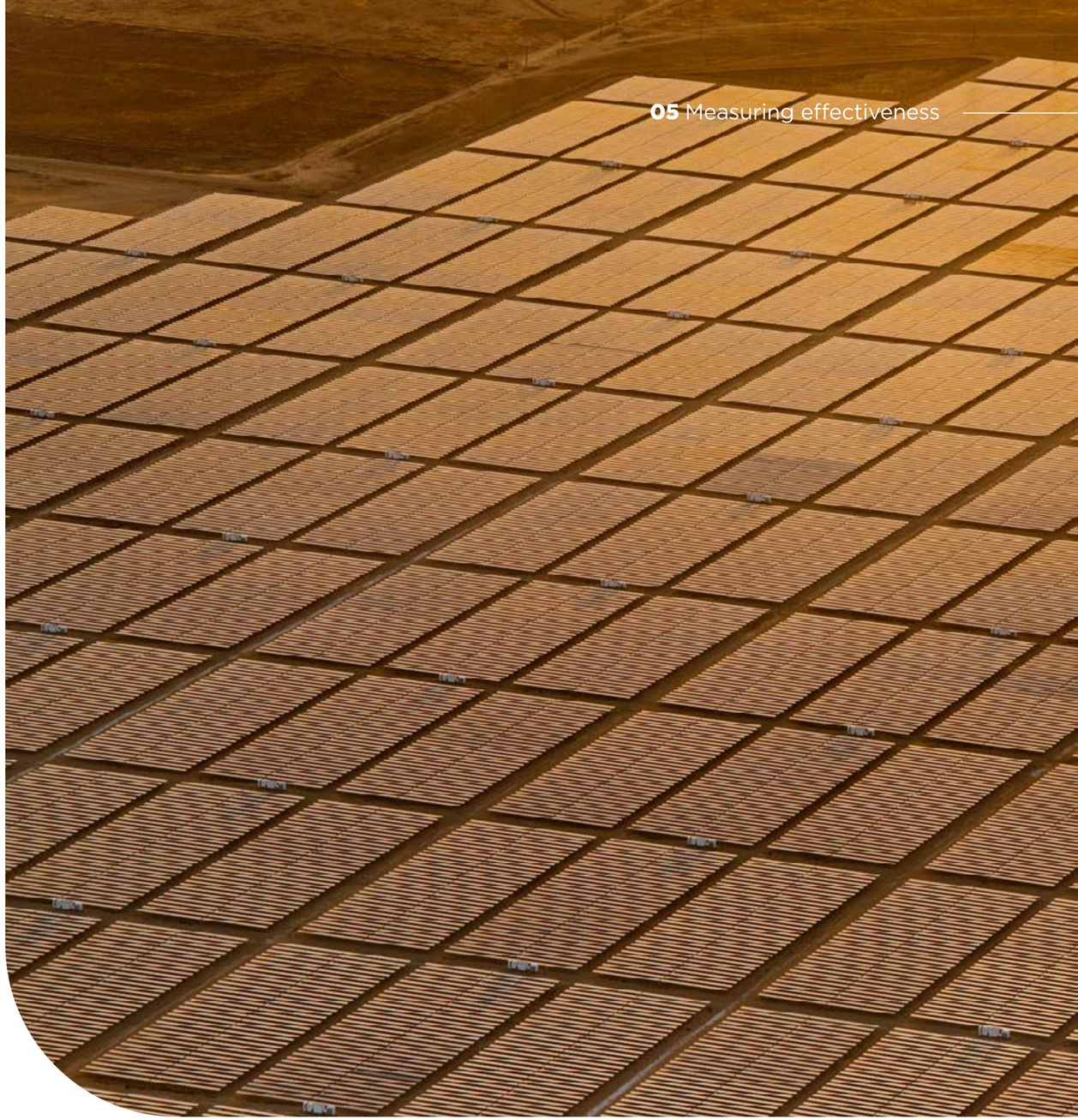
Whistleblowing Channels

E-mail: whistleblowing.au@sunpowerglobal.com
Address: SunPower Corporation Australia Pty Ltd.
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 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. TCL SunPower Australia ensures that all whistleblowing disclosures made in good faith are protected under Australian law, including the Corporations Act 2001 (Cth).

In 2025, we received no reports of violations in our operations.



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Module digital passport

As of H2 2026, the Company will introduce an advanced bilingual (Chinese–English) digital traceability tool that enables end-to-end visibility across the solar panel supply chain, from upstream quartz sourcing to downstream module manufacturing.

Using barcode tracking and a digital passport system, the tool captures and verifies key data at each stage, enhancing transparency, accountability, and product traceability. This solution supports responsible sourcing, strengthens supply chain oversight, and provides stakeholders with reliable, easily accessible information on the origin and lifecycle of solar products.







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Regulations we are watching

The 2025 regulatory environment for forced labour and supply chain due diligence

China is where our manufacturing supply chain operates and where regulatory developments directly affect our due diligence. The United States and European Union are where international best practice on forced labour due diligence is being set, and we align our programme to those standards and monitor them for the TZE group supply chain. In June 2026 these jurisdictions moved into direct tension, with both Australia and China named among 54 economies in a US Section 301 forced labour action.

Primary: Our supply chain jurisdiction

PEOPLE'S REPUBLIC OF CHINA

State Council Orders 834 and 835; Section 301 inclusion

In March and April 2026, the State Council issued Orders 834 and 835. Order 834 establishes a national framework for industrial and supply chain security through a multi-agency model. Order 835 addresses foreign measures that China characterises as improper extraterritorial jurisdiction, with the Ministry of Justice in a central role. The first enforcement action was a 2025 Ministry of Justice determination concerning EU investigative practices in relation to Nuctech. In June 2026, China was also named among 54 economies in the US Section 301 forced labour action, creating direct tension between US trade pressure on Chinese forced labour enforcement and the PRC counter-measures.

Why it matters to us

Our manufacturing supply chain sits directly in this tension. We rely on third-party social audits, SAQ responses and supplier-level traceability that the PRC framework could in principle constrain, while US enforcement treats the absence of such evidence as itself a risk indicator. As at the date of this Statement, the framework has not impeded our 2025 due diligence. We are monitoring developments closely and engage Chinese counsel and TZE's HQ legal team as required.

Other jurisdictions we watch

International standards we align to: The US and EU set the de facto standards for solar industry forced labour due diligence. We align our SAQ, traceability and audit programme to those standards across the TZE group supply chain.

UNITED STATES

Section 301 forced labour investigations + UFLPA

In June 2026 USTR named 54 economies, including Australia, as having failed to effectively enforce a prohibition on the importation of forced labour goods, in 60 Section 301 investigations. CBP separately continued to apply the UFLPA rebuttable presumption to solar imports linked to Xinjiang throughout 2025. Australia's inclusion engages the regime under which this Statement is filed; while Australia ranks low on the Global Slavery Index, USTR has identified its import controls as warranting strengthening.

EUROPEAN UNION

Forced Labour Regulation and CSDDD

Regulation (EU) 2024/3015 prohibits placing forced labour goods on the EU market from December 2027. The CSDDD (Directive (EU) 2024/1760) requires risk-based human rights due diligence, phased in through 2027 to 2029. TZE-manufactured product reaches the EU through other group channels.

TCL SunPower Australia works with Australian and international counsel, and with TZE's HQ legal and sustainability teams, to ensure our due diligence programme remains operable across these jurisdictions.

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Saudi Arabia joint venture

A new manufacturing footprint outside China

In July 2024, TZE signed a joint venture with subsidiaries of Saudi Arabia's Public Investment Fund (RELC, 40%) and Vision Industries (20%), with TZE's Singapore subsidiary holding 40%, to build a 20 GW ingot/wafer factory in the Kingdom of Saudi Arabia. The investment is approximately US$2.08 billion and the facility is expected to become the largest overseas ingot/wafer factory in the TZE group. The facility was not in commercial production during the 2025 reporting period and no product from this facility was supplied into Australia in 2025.

How we are assessing the risk

Saudi Arabia presents a distinct modern slavery risk profile. Walk Free's Global Slavery Index identifies structural risks associated with the kafala sponsorship system, construction-sector migrant worker exploitation, and manufacturing labour conditions. We acknowledge that large construction and manufacturing projects in the region carry inherent forced labour risk for migrant workers, particularly during the construction phase.

Through our HQ ESG team we are tracking the application of TZE's ESG Code of Conduct for Partners to the Saudi JV contractors and operators, and we expect to report more fully on this facility in our 2026 statement. Where any product manufactured at the Saudi facility is supplied into Australia in the future, it will be covered by the same traceability and due-diligence regime described in this Statement.



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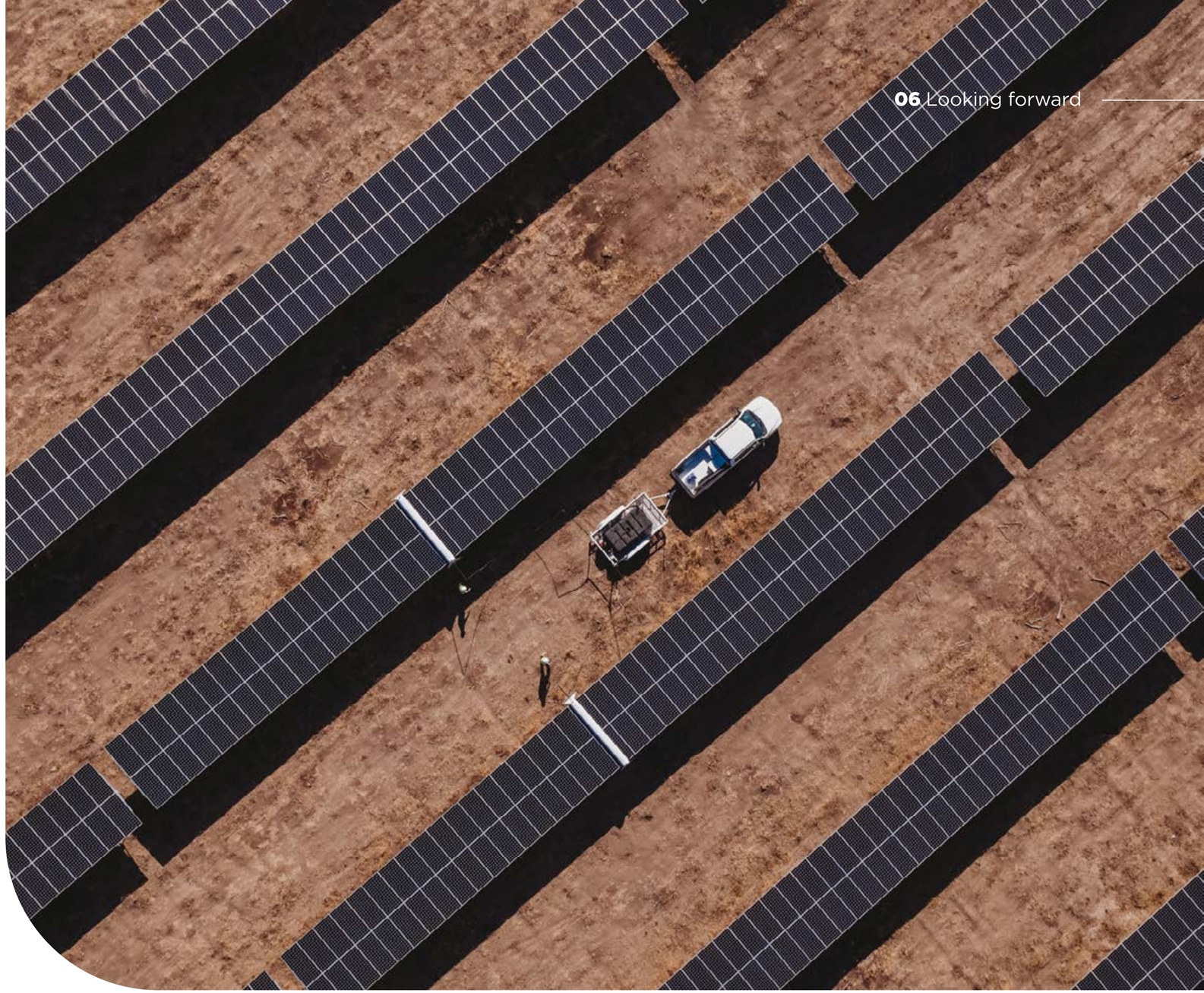
Continuous improvement and future focus

This Modern Slavery Statement has been prepared by SunPower Corporation Australia Pty Ltd in accordance with the Australian Modern Slavery Act 2018 (Cth). It outlines the steps TCL SunPower Australia has taken during the reporting period to identify, assess and address modern slavery risks within its operations and supply chain.

We are committed to continuously improving our approach to responsible sourcing, ethical business conduct and supply chain transparency. During the next reporting period, TCL SunPower Australia intends to further develop its supplier engagement, risk assessment and compliance processes as part of its ongoing modern slavery risk management framework.

This statement is based on information available to SunPower Corporation Australia Pty Ltd as at 26 June 2026 and reflects our current operations, business activities and supply chain arrangements.



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Respect for human rights must remain central to every organisation’s strategy as a core principle. This is equally a matter of ethics and sound economics.

Frank Zhang

Director, SunPower Corporation Australia Pty Ltd.

President of Global Sales and Marketing, TCL Zhonghuan

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