



Conflict Minerals Policy

SunPower fully supports the goals and objectives of federal legislation in the U.S., under the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act"), which aims to prevent the use of "conflict minerals" that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) or adjoining countries (as defined in the Act). Conflict minerals include: columbite-tantalite (coltan) (i.e., tantalum), cassiterite (i.e., tin), gold, wolframite (i.e., tungsten) or their derivatives (3TG), and could expand to include other minerals or their derivatives, as determined by the U.S. Secretary of State. SunPower is aware that the European Union has reached a political agreement on its own conflict minerals policy, and upon a full reading of the approved law, intends to fully support its goals and objectives.

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

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

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

To support this policy, SunPower will:

- Carry out due diligence consistent with the OECD's recommended process;
- Require all SunPower suppliers to acknowledge SunPower's Supplier Sustainability Guidelines which follow the SEIA Solar Commitment, and which include this policy as an annex;

- Commit to adopt, widely disseminate, and incorporate this policy in contracts and agreements with suppliers who may source the concerned minerals;
- Require concerned suppliers to declare that all products supplied either do not contain 3TG that are necessary to their production or functionality, or, if they do, that they originate from non-conflict areas or from refiners or smelters that have been validated as being conflict-free;
- Reserve the right to request additional documentation from suppliers regarding the source of any minerals included in its products, and ask for traceability data to be maintained for a minimum of five years;
- Coordinate with other companies, including through CFSI, to create better reporting solutions;
- Ensure transparency of the conflict minerals reporting process by making publicly available our reports.

SunPower evaluates its relationships with its suppliers on an ongoing basis to ensure continued compliance with this policy. Suppliers who do not comply with these requirements may have their existing business relationship with Sunpower terminated, and will be reviewed by SunPower's supply chain organization for future business. A grievance mechanism exists for reporting violations of the company's Conflict Minerals Policy. Violations may be reported by calling the Company's Compliance and Ethics Helpline at 1-866-307-5679.