

EPEAT Disclosure of Use of Conflict Minerals in Products

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The following report was prepared for conformance to the ANSI/NSF 457 Sustainability Leadership Standard.

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Conflict Minerals Disclosure of Hanwha Solutions Corporation

I. Introduction

Hanwa Solutions Corporation (“Qcells” or the “Company”) is committed to purchasing ethically sourced and produced components and products across its supply chains. In furtherance of this commitment, Qcells has prepared this Conflict Minerals Report (“Report”) for the period from January 1, 2024 – December 31, 2024 (the “Disclosure Period”), in accordance with the Global Electronics Council’s (“GEC”) Electronic Product Environmental Assessment Tool (“EPEAT”) Criteria and the NSF International (“NSF”)/American National Standard for Sustainability (“ANSI”) 457-2019, Criteria 11.4.1.

The Company has prepared this Report in conformance with Rule 13p-1 under the US Securities Exchange Act of 1934 (enforced by the US Securities and Exchange Commission (“SEC”), as amended, as well as the requirements of Form SD (collectively, the “Conflict Minerals Rules”). This Report is available on Qcells’ website.

A. *Background on Qcells*

Qcells is the largest producer of solar modules in North America. We are headquartered in Seoul, South Korea (Global Executive HQ) and Thalheim, Germany (Technology & Innovation HQ) with international manufacturing facilities in the U.S., Malaysia, China, and South Korea. Qcells has made a commitment to invest more than \$2.5 billion to build a vertical silicon-based solar supply chain in the U.S.

B. *Overview of Conflict Minerals Rules*

Under the Conflict Minerals Rules, certain minerals including tantalum, tin, tungsten, and gold are classified as “conflict minerals.” Although Qcells is not subject to the Conflict Minerals SEC reporting rules, we are voluntarily analyzing and reporting the extent to which we have any connections to these conflict minerals in our supply chains.

Specifically, the Conflict Minerals Rules instruct that a company conduct a multi-step analysis to assess whether conflict minerals are necessary to the functionality or production of its goods. If a company’s review indicates that conflict minerals are necessary to the functionality or production of its goods, it must conduct a good faith reasonable country of origin inquiry (“RCOI”) into those necessary conflict minerals to determine whether they originated in the Democratic Republic of the Congo (“DRC”) or an adjoining country (collectively, “covered countries”) or are from recycled or scrap sources.

Qcells proudly supports GEC’s mission to create supply chains with only sustainable and responsibly sourced electronics. The Company does not purchase conflict materials directly and it does not make any purchases from smelters or refiners in covered countries. However, through the efforts described in this Report, Qcells seeks to ensure its suppliers are also sourcing responsibly and in accordance with the Company’s standards and Code of Conduct.

II. Qcells’ Conflict Minerals Policy

The Company has a long-standing commitment to conducting our business in compliance with applicable international laws and regulations. Qcells condemns human rights abuses associated with the sourcing, extraction, export, or trade of any goods, including conflict minerals. Qcells’ suppliers are informed of the Company’s standards

and principles set forth in its Code of Conduct regarding the responsible sourcing of minerals.¹

The Company's suppliers are prohibited from using conflict minerals sourced from covered countries. Under Qcells' standards, partner suppliers should exercise reasonable due diligence to ensure that conflict minerals are not sourced from a covered country.

III. Qcells' Reasonable Country of Origin Inquiry

The Conflict Minerals Rules require the Company to assess whether conflict minerals are necessary to the functionality or production of products manufactured by the Company or contracted to be manufactured by the Company. If conflict minerals are necessary to the production of its products, the Company must perform an RCOI to determine whether conflict minerals are sourced from one or more covered countries or from recycled or scrap sources.

A. Qcells' Product Database Review

During the Disclosure Period, the Company undertook a review of its products to assess whether conflict minerals were necessary to their functionality or production. This process included a review of all the bill of materials for our products. Additionally, Qcells collaborated with our Procurement and Manufacturing Planning Team, our suppliers, and other individuals with knowledge of our sourcing and operations to compile the information necessary to determine whether an RCOI is required. Through this process, Qcells verified the scope of potential components that may include conflict minerals.

Qcells determined that certain parts or components of products may contain one or more conflict minerals. As such, the Company conducted an RCOI to determine whether any of the conflict minerals originated, or may have originated, in the covered countries and whether such conflict minerals originated from recycled or scrap sources.

B. Qcells' RCOI Process

Using its bills of materials, Qcells identified suppliers from which the Company purchased components necessary to the functionality or production of the products ("direct suppliers"). Based on this review, the Company determined that it purchased products or components from direct suppliers that were necessary to the functionality or production of the finished products. After direct suppliers were identified, Qcells' Procurement Team sent each direct supplier a Conflict Minerals Reporting Template ("CMRT") survey developed by the Responsible Minerals Initiative ("RMI"). The RMI is utilized by companies around the world in their efforts to address responsible mineral sourcing in their supply chains.

The question prompts within the CMRT survey are developed to facilitate supply chain transparency regarding mineral country of origin and the smelters and refiners being used by the Company's direct suppliers. Significantly, direct suppliers were required to confirm whether conflict minerals were used in the production of the product(s), where the smelters and refiners of the conflict minerals were located, and whether the conflict minerals were from recycled or scrap sources.²

C. Qcells' RCOI Assessment Results

Qcells worked diligently with its direct suppliers to confirm whether conflict minerals were used in the production of its products. As stated above, we identified direct suppliers that directly supplied materials necessary to the

¹ The Company's code of conduct can be found at its website at the following link: <https://us.qcells.com/code-of-conduct/>.

² The RMI CMRT Survey can be found at the following link: <https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>.

production or functionality of its products and were therefore subject to the Conflict Minerals Rules.

The Company's Procurement Team reviewed the direct suppliers' CMRT survey responses for completeness and accuracy based on historic information of the suppliers and information previously provided. Where a CMRT survey was incomplete or responses were flagged as being inconsistent, the survey was returned to the direct supplier for updates. We relied on our direct suppliers to provide us with accurate information and representations relating to smelter and refiner identities and country of origin.

Through the RCOI assessment process, Qcells has made best efforts to identify the origin of the conflict minerals in our supply chain. Qcells has surveyed all its current direct suppliers and, to the best of our knowledge, Qcells has no reason to believe that any conflict minerals necessary to the production or functionality of its products may have originated in a covered country or originated from recycled or scrap sources.

IV. Ongoing Commitment to Compliance

Qcells has developed an internal revision-controlled global process to document the policies, methods, roles, and responsibilities related to implementing the conflict minerals related procedures outlined in this Report.

Moving forward, Qcells will perform an annual review of the internal revision-controlled global process and make any necessary amendments to bill of material information. Any change in product design or supplier use will require assessment of suppliers' use of conflict minerals and the collection of new CMRT disclosures (if not yet collected, or greater than one year old). In parallel, we will internally review all CMRT disclosures of existing suppliers and will require new CMRT surveys to be completed annually or confirmation that no changes are necessary from the prior disclosure. In the case of any findings of conflict minerals from covered countries, we are prepared to develop a remediation plan and timeline in alignment with risk factors and fully disengage if a supplier does not cooperate with the terms of the plan by the end of the remediation timeline.

Qcells maintains its commitment to continuously improve its RCOI processes. The Company will review our current procedures and, where necessary, adopt improved processes with the goal of clearly and effectively communicating our standards with direct suppliers. Our mission is to reduce the risk that conflict minerals from covered countries are in our supply chain.