EPEAT Disclosure of Use of Conflict Minerals in Products

Last Updated: October 12, 2026

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

qcells

Table of Contents

1. DISCLOSURE OF USE OF CONFLICT MINERALS IN PRODUCTS (CRITERIA 11.4.1).....3

1. Disclosure of use of conflict minerals in products (Criteria 11.4.1)

Conflict Minerals Disclosure of Hanwha Solutions Corporation

I. Introduction

Hanwha 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, 2025 – December 31, 2025 (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 voluntarily, with reference to and in conformance with Rule 13p-1 under the US Securities Exchange Act of 1934, as amended, and the requirements of Form SD issued by the United States Securities and Exchange Commission (collectively, the "Conflict Mineral 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 subject to those rules 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]

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

The Company's suppliers are expected to exercise reasonable due diligence regarding the origin and chain of custody of conflict minerals and to source such minerals responsibly and in accordance with Qcells' standards and Code of Conduct. Suppliers are expected to identify, assess, and appropriately address sourcing risks, including risks associated with minerals originating in covered countries. Sourcing from a covered country does not, by itself, establish that a supplier's sourcing practices are inconsistent with these expectations.

III. Qcells' Reasonable Country of Origin Inquiry

Consistent with its voluntary use of the Conflict Minerals Rules as a reference, the Company assesses whether conflict minerals are necessary to the functionality or production of products manufactured by the Company or contracted to be manufactured by the Company. Where such minerals are necessary, the Company conducts 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 production or functionality of Qcells' products and included those suppliers in the Company's RCOI process.

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

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.

Supplier CMRT disclosures identified several smelters and refiners located in covered countries. These supplier-level disclosures do not establish whether minerals processed by those facilities were incorporated into Qcells products. Based on the supplier-provided information and available smelter and refiner information reviewed, Qcells did not identify information demonstrating that conflict minerals necessary to the production or functionality of its products financed or benefited armed groups in covered countries. This conclusion is limited to the information reviewed. Qcells will continue to review supplier CMRT disclosures and assess identified sourcing risks as part of its ongoing due diligence process.

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 its internal revision-controlled global process and update bill of materials information as necessary. Changes in product design or supplier use will require an assessment of suppliers' use of conflict minerals and collection of updated CMRT disclosures where existing disclosures are unavailable, more than one year old, or no longer reflect the applicable products or sourcing arrangements. Qcells will also review existing suppliers' CMRT disclosures annually and

request updated disclosures or confirmation that the previously provided information remains accurate.

Where the review identifies potential sourcing risks, Qcells will assess those risks and determine appropriate follow-up measures, which may include further supplier inquiries, engagement, or corrective action consistent with Qcells' standard and Code of Conduct. Qcells remains committed to improving its RCOI and due diligence processes, communicating its expectations to suppliers, and promoting responsible mineral sourcing throughout its supply chain.

Subject to change without notice. ©Qcells EPEAT Disclosure of Use of Conflict Minerals in Products_202610_Rev03
Hanwha Q CELLS America Inc. 300 Spectrum Center Drive, Suite 500, Irvine, CA 92618 | (888) 249 7750 | **EMAIL** na.support@qcells.com | **WEB** www.qcells.com