Modern Slavery Statement

1K5 APAC Holding Pty Ltd

trading as 1Komma5 Australia

Reporting period: 1 January 2025 – 31 December 2025

Prepared under the Modern Slavery Act 2018 (Cth) and submitted to the Australian Government Modern Slavery Statements Register.

Inaugural Statement

> This Statement is 1Komma5 Australia's first Modern Slavery Statement. It sets out the policies, due diligence activities and supply-chain engagement undertaken during the 2025 calendar year and establishes a baseline against which progress will be measured in subsequent reporting periods.

Statement of approval

This Modern Slavery Statement is made by 1K5 APAC Holding Pty Ltd (ACN 662 726 669) trading as (1Komma5 Australia, we, us or our) pursuant to section 16 of the Modern Slavery Act 2018 (Cth) (the **Act**) for the reporting period 1 January 2025 to 31 December 2025.

For the purposes of section 16(2)(b) of the Act, the Statement was approved by the board of directors of 1K5 APAC Holding Pty Ltd on 29 June 2026 in its capacity as the principal governing body of the reporting entity and is given in accordance with section 14(2)(d)(ii) of the Act.

Signed,

Brendan Evans

Director, 1K5 APAC Holding Pty Ltd

Date: 29 June 2026

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Message from the Director

1Komma5 Australia is proud to publish its first Modern Slavery Statement. Our purpose is to accelerate Australia's transition to clean, intelligent, decentralised energy — and we recognise that the products that make this transition possible are built on global supply chains where modern slavery risks must be actively identified and addressed.

The renewable energy sector relies on extended, multi-tier supply chains that include the extraction and refining of critical minerals, manufacturing of solar modules, batteries, inverters and electronics, and the installation and servicing of those products in Australian homes and businesses. Each of those stages carries potential exposure to forced labour, child labour, debt bondage and other practices the Modern Slavery Act 2018 (Cth) defines as modern slavery.

During 2025 we focused on three priorities: (1) understanding our supply chain, with a particular emphasis on our top-tier suppliers and the origin of our own-branded battery products manufactured in China; (2) drawing on the human-rights due diligence already conducted at group level by our German parent under the Lieferkettensorgfaltspflichtengesetz (German Supply Chain Due Diligence Act, LkSG); and (3) preparing the policy, governance and procurement foundations required to meet our obligations under the Australian Act in this and future reporting periods.

We acknowledge that this is the start of a journey. We commit to continuous improvement, transparency, and to working collaboratively with our suppliers, our customers, our people and our regulators to ensure that the energy transition we are part of is built on respect for human rights.

Brendan Evans

Director, 1K5 APAC Holding Pty Ltd

About this Statement

This Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the Act)[1] and addresses each of the seven mandatory reporting criteria set out in section 16(1) of the Act. This is the first statement made by 1Komma5 Group and covers the reporting period from 1 January 2025 to 31 December 2025 (**Reporting Period**).

Among other things, this Statement describes the actions taken during the Reporting Period to assess the risks of and to prevent modern slavery from occurring within 1Komma5's operations and its supply chains.

This Statement covers 1K5 APAC Holding Pty Ltd (ABN: 45 662 726 669) and each of its Subsidiaries listed in Criterion 1 collectively referred to as "**1Komma5 Group**", "**we**", "**us**" and "**our**".

1K5 APAC Holding Pty Ltd is the reporting entity. The Statement covers the operations and supply chains of 1K5 APAC Holding Pty Ltd and its Australian operations conducted under the 1Komma5 brand for the period 1 January 2025 to 31 December 2025 (the Reporting Period). This reporting period aligns with the financial year used by our ultimate parent company, 1KOMMA5° GmbH, which is based in Hamburg, Germany.

1K5 APAC Holding Pty Ltd has annual consolidated revenue exceeding AUD $100 million and therefore meets the threshold for a reporting entity under section 5 of the Act.

This Statement was prepared with input from the Australian leadership team and in consultation with the ESG and Sustainability function of our German parent. It has been reviewed by external legal counsel.

[1] Unless otherwise provided or the context differs, each reference to a section in this Statement is to a section of the *Modern Slavery Act 2018* (Cth).

Criterion 1 – Identity of the reporting entity

Criterion 1 – in accordance with section 16(1)(a)

Reporting entity	1K5 APAC Holding Pty Ltd
Trading name	1Komma5 (1Komma5 Australia)
ACN	662 726 669
ABN	45 662 726 669
Registered office	Level 12, 213 Miller Street, North Sydney NSW 2060
Principal place of business	Level 12, 213 Miller Street, North Sydney NSW 2060
Ultimate holding company	1KOMMA5° GmbH, Neuer Wall 35, 20354 Hamburg, Germany
Reporting period	1 January 2025 – 31 December 2025
Type of statement	Inaugural single-entity Statement
Subsidiaries	Natural Solar Pty Ltd (ABN: 79 160 373 688) Solaray Energy Pty Ltd (ABN: 80 103 836 497) 1K5 North-Eastern Australia Pty Ltd (ABN: 61 674 966 673) Arkana Group Pty Ltd (ABN: 33 604 703 362) Kozco Energy Group Pty Ltd (ABN: 26 605 073 943) 1Komma5 Distribution Pty Ltd (ABN: 17 667 423 243) 1K5 Heartbeat Pty Ltd (ABN: 27 682 650 915)
Contact for this Statement	Brendan Evans, Chief Financial Officer, brendan.evans@1komma5.com.au

Criterion 2 – Structure, operations and supply chains

Criterion 2 – in accordance with section 16(1)(b)

Corporate structure

1K5 APAC Holding Pty Ltd is an Australian proprietary limited company that operates 1Komma5's business in the Asia-Pacific region under the 1Komma5 brand. The company is part of the 1KOMMA5° group, whose ultimate parent is 1KOMMA5° GmbH, headquartered at Neuer Wall 35, 20354 Hamburg, Germany.

At an international group level, 1KOMMA5° employs approximately 2,500 people across around 80 sites worldwide, including 26 showrooms, and generated revenue of approximately €490 million in 2024.

A complete list of the subsidiaries and controlled entities of 1K5 APAC Holding Pty Ltd is set out in Criterion 1 above.

Operations

1Komma5 Australia designs, sells, installs and services integrated residential and commercial clean-energy solutions. Our offering includes:

- **Solar PV systems** — sale and installation of rooftop solar panels and balance-of-system components for residential and small-commercial customers.
- **Battery energy storage** — sale and installation of residential and small-commercial battery systems, including our own-branded battery products manufactured in China.
- **Inverters and energy management** — supply and installation of inverters, microinverters and our AI-driven Heartbeat energy management platform.
- **Heat pumps and EV charging infrastructure** — supply and installation of low-carbon heating and electric-vehicle charging equipment.
- **Ongoing servicing** — monitoring, software updates, warranty support and maintenance of installed systems.

Our Australian workforce comprises office-based employees (sales, operations, engineering, customer service, marketing and corporate functions) and field-based installation crews. As at 31 December 2025 we employed approximately 248 people in Australia, supported by approximately 260 accredited subcontractor installation crew members.

Supply chains

Our supply chain has two main legs:

- **Product supply chain** — manufactured solar modules, inverters, battery systems, microinverters, monitoring hardware and balance-of-system components. The majority of these products are manufactured in China, with some inverter and microinverter products manufactured in or sourced from the United States and other Asian markets.
- **Services and overheads supply chain** — software and cloud services, professional services (legal, accounting, marketing, consulting), logistics and warehousing, vehicle fleet, office leases and utilities, marketing media, IT hardware, and labour-hire / subcontractor installation services.

During the Reporting Period, our six largest third-party suppliers by spend represented approximately 61% of our addressable third-party spend in 2025. Our other suppliers individually represented significantly lower percentages of our third-party spend (that is each other supplier represented less than 0.5% of our third-party spend).

Our major suppliers supply not only to us, but more broadly across the 1K5 International Group and have been doing so for an extended period of time.

Our main suppliers are located in China and the United States of America.

Top six suppliers — country, product category and key controls

Country of manufacture / HQ	Product / service supplied	Key human-rights controls disclosed by the supplier
Wenzhou & Wuxi, China (HQ Zhejiang; established 2019)	Inverters and battery energy-storage systems	SA8000-certified social responsibility management system; internal Social Responsibility Management Manual, Prohibition of Child Labour Management Procedures, Anti-fraud and Whistleblower Management System; aligned to UN Guiding Principles on Business and Human Rights (UNGPs), ILO core conventions and SA8000; supplier selection prioritises ISO 9001 / 14001 / 45001 / SA8000 certified vendors; reported zero incidents of child or forced labour.
Hefei, Anhui Province, China (listed on the Shenzhen Stock Exchange)	Inverters, hybrid inverters and energy-storage systems	Global Human Rights Policy referencing the UN International Bill of Human Rights, ILO core conventions and SA8000; SA8000 certified (audit conducted by SGS, September 2024); ISO 37301 compliance and ISO 27001 information-security certifications; Supplier Code of Conduct covering human rights, labour, health and safety, environment, ethics and management systems; OECD-aligned due-diligence for conflict minerals; 24/7 whistleblowing channels (hotline, app, WeChat, email) with 25 cases received and handled in 2024; Strategy and Sustainability Committee oversight; member of UN Global Compact.
Fremont, California, USA (manufacturing via contract manufacturers, including in India, Mexico and the USA)	Microinverters, IQ batteries, EV chargers and energy-management hardware	Publicly listed (NASDAQ) SEC registrant; Supplier Code of Conduct prohibiting forced labour, child labour, slavery and human trafficking; signatory to the Solar Energy Industries Association (SEIA) Forced Labor Prevention Pledge; compliance with the Uyghur Forced Labor Prevention Act (UFLPA); Conflict Minerals Policy and annual SEC Form SD / Conflict Minerals Report covering 170 in-scope suppliers; supply-chain mapping to third tier; anonymous third-party whistleblower hotline; California Transparency in Supply Chains Disclosure published.
Mountain View, California, USA (global operations)	Cloud computing, Workspace and other software services supporting the Heartbeat energy-management platform and corporate IT	Supplier Code of Conduct setting environmental, social and ethical expectations; member of the Responsible Business Alliance (RBA); ongoing supplier due diligence and audits with corrective-action process overseen by the Supplier Responsibility Steering Team (chaired by the Chief Compliance Officer); public Risk and Compliance reporting via the company's annual disclosures.

Country of manufacture / HQ	Product / service supplied	Key human-rights controls disclosed by the supplier
Hengdian, Zhejiang Province, China; module factories in Lianyungang and Sihong (Jiangsu) and cell factory in Yibin (Sichuan)	Solar cells and modules (including manufacturing of certain 1Komma5-branded module products)	SA8000-certified module factory (TÜV NORD CERT, valid 2023–2026); Code of Business Conduct, Anti-forced labour policy and Responsible Sourcing Policy; 100% Supplier Code of Conduct sign-off and annual due-diligence audits against the SA8000 standard; SMETA 4-Pillar audit conducted by TÜV SÜD at the site (March 2025); product traceability reporting covering polysilicon → ingot → wafer → cell → module; ISO 9001 / 14001 / 45001 / 50001 / 27001 / 56005 / 20400 certifications; verified 100% green electricity consumption at cell and module factories (TÜV SÜD verification, 2024).
United States of America	Battery energy-storage systems	Publicly listed (NASDAQ) SEC registrant; Supplier Code of Conduct prohibiting forced labour, child labour, slavery and human trafficking; conflict minerals report and disclosed list of smelters and refineries of 3TG materials; global human rights policy.

Beyond these six suppliers, our extended supply chain includes additional component manufacturers, freight and logistics providers, Australian distributors, accredited installation subcontractors and a range of services suppliers. We have begun the work of mapping our supply chain beyond our top six suppliers and will expand the supplier-engagement program in subsequent reporting periods.

Criterion 3 – Modern slavery risks in our operations and supply chains

Criterion 3 – in accordance with section 16(1)(c)

Risk assessment approach

In preparing this Statement we have undertaken an initial risk assessment of our operations and supply chains, informed by:

- the Commonwealth Modern Slavery Act – Guidance for Reporting Entities;
- the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct;
- publicly available country, sector and product risk indices, including the Global Slavery Index, the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor, and the U.S. Department of State Trafficking in Persons (TIP) Report;
- information disclosed by our suppliers in their sustainability reports, ESG questionnaires, audit reports and certifications; and
- the human-rights due-diligence outputs prepared by our German parent under the Lieferkettensorgfaltspflichtengesetz (German Supply Chain Due Diligence Act, LkSG), which apply to many of our shared tier-1 suppliers.

Risks in our operations

We assess the risk of modern slavery in our own Australian operations to be low. Our direct workforce is engaged on Australian employment contracts and covered by the Fair Work Act 2009 (Cth), the National Employment Standards and (where applicable) relevant Modern Awards. Pay is processed via reputable Australian payroll providers and wages are above the legislated minimum.

We identify some elevated, residual risk in the following areas of our operations:

- **Subcontracted installation labour** — solar and battery installation in Australia is delivered partly through accredited subcontractor crews. Subcontractor labour models can carry sham-contracting, underpayment and labour-hire risks that, in their most severe form, can amount to forced labour or debt bondage.
- **Cleaning, security and facilities services** — these services, where engaged at our offices and warehouses, are recognised by the Australian Government as elevated-risk categories for vulnerable workers.
- **Migrant and visa-holder workers in adjacent labour pools** — workers in our broader value chain on temporary visas may face additional vulnerability.

Risks in our supply chains

We assess the most significant modern slavery risks in our supply chains to arise upstream from our direct (tier-1) suppliers, particularly in:

- **Mining and refining of critical and conflict minerals** — including polysilicon, lithium, cobalt, nickel, manganese, copper, tin, tantalum, tungsten and gold used in solar cells, batteries, inverters and electronics. These commodities have well-documented links to forced labour and child labour, including in the Democratic Republic of the Congo (**DRC**) and adjoining countries (3TG), the Xinjiang Uyghur Autonomous Region (polysilicon), and artisanal mining sites.

- **Solar polysilicon, wafer and cell manufacturing** — concentrated in China, with public reporting identifying forced-labour risks associated with state-sponsored labour-transfer programs in the Xinjiang Uyghur Autonomous Region. We do not knowingly source any components manufactured in Xinjiang. Our principal solar-module supplier provides product traceability reports tracing polysilicon to Qinghai, ingots to Guangdong, wafers and modules to Jiangsu and cells to Sichuan.
- **Battery cell, module and pack manufacturing** — including upstream extraction of lithium, cobalt and nickel, and downstream cell assembly, predominantly in China. Our own-branded battery products are manufactured in China. Cobalt mining in the DRC and nickel mining in parts of Southeast Asia have been the subject of well-documented child-labour and forced-labour findings.
- **Electronics manufacturing** — including printed circuit boards, semiconductors and microinverter assembly, which depend on the broader Asian electronics supply chain.
- **International logistics** — particularly ocean freight, where seafarer welfare and migrant labour risks are well documented.

> Risk classification — our top-tier suppliers are predominantly large, publicly disclosed manufacturers with mature human-rights and social-responsibility management systems (SA8000, ILO conventions, UNGPs, OECD due-diligence guidance, RBA membership, SEC reporting, or SMETA audit history). We classify our principal modern slavery risks as residing beyond tier-1, in upstream mining and refining operations. We therefore prioritise traceability, supplier certification and conflict-minerals reporting as the most effective levers available to us at our current scale.

Criterion 4 – Actions taken to assess and address risks

Criterion 4 – in accordance with section 16(1)(d)

Governance

Responsibility for modern slavery compliance in Australia sits with the Managing Director who reports to the board of 1K5 APAC Holding Pty Ltd. At group level, the Head of ESG and Sustainability (based in Germany) leads human-rights due diligence under the LkSG and coordinates with the Australian team.

During 2025 and 2026 we engaged external Australian legal counsel to advise on the application of the *Modern Slavery Act 2018* (Cth) to our business, draft our pro-forma supplier questionnaire, and to assist in the preparation of this Statement and our internal Modern Slavery Policy.

Policies adopted or developed during the Reporting Period

- **Modern Slavery Policy** — adopted 12 February 2026
- **Supplier Code of Conduct** — adopted 12 February 2026.
- **Whistleblower Policy** — adopted 12 February 2026
- **Procurement and contracting standards** — modern slavery, anti-bribery and human-rights warranties are being introduced into new and renewed supplier agreements.

Supplier due diligence

During the Reporting Period we took the following steps to assess modern slavery risks in our supply chain:

- issued an ESG and Sustainability questionnaire to our top suppliers covering corporate identity, certifications and audits, environment, social responsibility and human rights, compliance and future strategy;
- collected and reviewed publicly available sustainability and ESG reports from our top six third-party suppliers who supply 61% of our third party spend;
- obtained third-party certificates and audit reports for our principal manufacturing suppliers, including SA8000 certificates for applicable top six third-party suppliers;
- obtained supply-chain traceability information for our solar modules tracing polysilicon, ingots, wafers, cells and modules to specific named factories in Qinghai, Guangdong, Jiangsu and Sichuan provinces;
- reviewed conflict-minerals (3TG) reporting from each of top six third-party suppliers noting core efforts by each to seek to procure no 3TG materials from high-risk sources;
- leveraged the human-rights risk analysis and supplier ratings produced by our German parent under the LkSG, which applies to many of our shared tier-1 suppliers; and
- engaged with our German parent's ESG and Sustainability function to request the group Supplier Code of Conduct, governance and oversight procedures, human-rights risk assessments and supply-chain map.

Subcontractor and labour-hire due diligence (Australia)

Our Australian installation subcontractor crews are accredited under the Clean Energy Council (CEC) accreditation scheme. During the Reporting Period we as part of our installer onboarding process, we have ensured that each subcontractor has active workers' compensation insurances, relevant technical licences, insurances and requirements within our installer agreements for compliance with 1K5's safe work practices.

Training and awareness

Formal training was not provided to employees in 2025. Training for key personnel has been identified as a planned action during 2026 and we are in the process of developing the relevant training materials in consultation with the broader 1Komma5 Group.

Remediation

Where we identify, or are made aware of, indicators of modern slavery in our operations or supply chains, our response will follow the UNGPs' effective remedy framework. This includes:

- ensuring the immediate safety of any affected workers;
- engaging directly with the supplier or other counterparty to understand the root cause and require a corrective action plan with verifiable milestones;
- providing or co-operating with the provision of remedy to affected workers (which may include back-pay, reimbursement of recruitment fees, restoration of identity documents, repatriation support, or referral to specialist organisations);
- escalating to law enforcement and relevant authorities where appropriate; and
- reviewing whether to continue, restructure or terminate the commercial relationship.

During the Reporting Period, no actual instances of modern slavery were identified within our operations or our top-tier supply chain. No remediation steps were therefore required.

Criterion 5 – Assessing the effectiveness of our actions

Criterion 5 – in accordance with section 16(1)(e)

As this is our inaugural Statement, we have focused this reporting period on establishing a baseline against which future effectiveness can be measured. The indicators we will track from 2026 onwards are set out below.

Focus area	Baseline indicator (2025)	Target / direction (2026+)
Supplier coverage of due diligence	Top 7 suppliers (~61% of addressable third-party spend) covered by ESG questionnaire and certificate review.	Expand due diligence activities with top 7 suppliers and reissue questionnaire annually.
Supplier code-of-conduct sign-off	Group Supplier Code of Conduct under finalization in 2025 and adopted in Australian business in February 2026.	100% of tier-1 suppliers to sign updated Supplier Code of Conduct or equivalent contractual modern slavery clauses.
Independent audit coverage	SA8000 / SMETA / TÜV reports obtained for our principal Chinese manufacturing suppliers.	Maintain valid third-party social-responsibility audit (SA8000 / SMETA / RBA-VAP) for all primary manufacturing sites supplying 1Komma5-branded products.
Conflict-minerals traceability	Traceability reports received from each of the top six third-party suppliers.	Obtain conflict-minerals declarations (CMRT / RMI) for all in-scope battery, inverter and module suppliers.
Training	Training program was not rolled out to all key staff during 2025.	100% of procurement, operations and senior management staff to complete annual modern slavery training.
Grievance channel uptake	Whistleblower channel under finalization during 2025 and adopted in 2026.	Whistleblower channel live, communicated to all employees and suppliers, and reported on annually.
Identified incidents / reports	Nil identified during 2025.	Continue to track and disclose; investigate and remediate any report received.

We will also conduct an annual internal review of the Modern Slavery Policy, our Supplier Code of Conduct, and the operation of our whistleblower channel.

Criterion 6 – Consultation with entities we own or control

Criterion 6 – in accordance with section 16(1)(f)

1K5 APAC Holding Pty Ltd is the reporting entity for this Statement. Consultation has been undertaken with the directors and senior leaders of each entity owned or controlled by 1K5 APAC Holding Pty Ltd in Australia, including each of the Subsidiaries listed in this statement. The preparation of this Statement was coordinated centrally with input from finance, operations, procurement, people and culture, legal and executive leadership.

Although 1KOMMA5° Technology GmbH (Germany) is not a reporting entity under the Australian Act, we have consulted with our German parent — in particular its ESG and Sustainability function — given the overlap of suppliers with our European operations and to align with the human-rights due-diligence work conducted under the LkSG.

Criterion 7 – Other relevant information

Criterion 7 – in accordance with section 16(1)(g)

Industry collaboration

The Australian solar and battery industry has been the subject of increasing public attention on forced-labour risks in the upstream polysilicon and battery supply chains. We support sector-wide initiatives that promote transparency and remediation.

COVID-19 and other thematic risks

We continue to recognise that disruptive events — such as global freight disruption, geopolitical sanctions, and the rapid scaling of the global battery supply chain — can heighten modern slavery risk. We monitor relevant developments and adjust our supplier-engagement priorities accordingly.

Alignment with the German Supply Chain Due Diligence Act (LkSG)

Our German parent is subject to the LkSG, which imposes mandatory human-rights and environmental due-diligence obligations across its operations and supply chains. Because many of our tier-1 suppliers are shared with the European business, the group LkSG framework — including risk analysis, the Supplier Code of Conduct, grievance mechanisms and reporting — provides a useful foundation for our Australian compliance under the Act. We intend to continue aligning the two frameworks while ensuring that the Australian-specific elements (Modern Slavery Statement, Australian whistleblower framework, Australian Fair Work compliance) are addressed in their own right.

1KOMMA5°
AUSTRALIA

Forward commitments for 2026

Building on the foundations laid in 2025, we commit to the following actions during the 2026 reporting period:

- finalise and publish our Modern Slavery Policy, Supplier Code of Conduct and Whistleblower Policy;
- extend our supplier questionnaire program to cover a target of ≥80% of addressable third-party spend;
- introduce standard modern slavery, anti-bribery and human-rights warranties into new and renewed supplier agreements;
- deliver targeted modern slavery training to all procurement, operations and senior management staff;
- publish the Australian whistleblower channel (with anonymous external reporting option) and communicate it to employees, subcontractors and suppliers;
- obtain conflict-minerals (CMRT / RMI-aligned) declarations from in-scope battery, inverter and module suppliers; and
- conduct an internal effectiveness review and report on progress in our 2026 Modern Slavery Statement.

Annexure A – Mandatory criteria index

Mandatory criterion (s.16(1) of the Act)	Where addressed in this Statement
1. Identify the reporting entity	Criterion 1 – Identity of the reporting entity
2. Describe the structure, operations and supply chains of the reporting entity	Criterion 2 – Structure, operations and supply chains
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Criterion 3 – Modern slavery risks in our operations and supply chains
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address those risks, including due diligence and remediation processes	Criterion 4 – Actions taken to assess and address risks
5. Describe how the reporting entity assesses the effectiveness of those actions	Criterion 5 – Assessing the effectiveness of our actions
6. Describe the process of consultation with any entities the reporting entity owns or controls	Criterion 6 – Consultation with entities we own or control
7. Any other information the reporting entity considers relevant	Criterion 7 – Other relevant information / Forward commitments

End of Statement.