



# Modern Slavery Statement

Enphase Energy, Inc.

FY25

This statement covers the activities of Enphase Energy, Inc. and its owned and controlled entities including Enphase Energy Australia Pty Ltd (ACN 166 383 035) during the period 1 January 2025 to 31 December 2025.

References in this statement to 'Enphase Energy', 'we', 'our' and 'us' refer to Enphase Energy, Inc. and its owned and controlled entities.

This modern slavery statement is submitted under the *Modern Slavery Act 2018 (Cth)* (the Act) and sets out the actions taken by Enphase during the reporting period to assess and address modern slavery risks in its operations and supply chains, the consultation process undertaken, and how the effectiveness of these actions is assessed.

## About us

We are a global energy technology company with operations supporting the design, manufacture, and distribution of microinverter-based solar and battery systems and related energy management solutions that enable people to harness the sun to make, use, save, and sell their own power.

We are headquartered in Fremont, California, USA and, together with our subsidiaries, design, develop, manufacture and sell home energy solutions that manage energy generation, energy storage, and control and communications on one intelligent platform. We operate across multiple regions and sell products in more than 160 countries.

We have a number of owned and controlled entities operating in various countries including the United States, India, France, Germany, Netherlands, Australia, New Zealand, and other international markets where we conduct business operations. Our core operations span globally with significant presence in the Americas, India, EMEA region, and APAC region. We also operate manufacturing facilities through contract manufacturers in the United States, India, and other locations. We engage approximately 2,781 employees across our global offices.

We work with suppliers from a number of countries including the United States, China, India, Netherlands, and other global locations. Our suppliers are primarily located across Asia, North America, and Europe, with significant manufacturing operations in India and the United States.

The main types of goods and services that we procure include:

- semiconductor components and materials;
- contract manufacturing microprocessors;
- electronic components and services;
- packaging and assembly services;
- logistics and transportation;
- professional services including legal, financial, and consulting services;
- information technology services and equipment; and
- general corporate services.

We engage our suppliers through a combination of long-term strategic partnerships and shorter-term arrangements, depending on the nature of the goods and services required. We also have a number of indirect suppliers, including providers of raw materials and other materials used in semiconductor manufacturing.

## Modern slavery risks

We recognize modern slavery risks can arise in complex, global supply chains, particularly where raw materials and intermediate goods may originate in higher-risk geographies or from entities potentially linked to credible allegations of forced labour. We endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains and are committed to complying with all relevant laws and regulations in the locations in which we operate, including forced labor laws.

Our codes and policies expressly prohibit the use of forced labor throughout our supply chain. The [Enphase Supplier Code of Conduct](#) prohibits forced labor and human trafficking and requires suppliers to implement effective management systems to ensure compliance across their own upstream value chains. We also maintain a standalone [Policy Against Forced Labor](#). These documents are communicated to suppliers and embedded in our contracting approach.

In 2025, we enhanced our supplier risk assessment process to improve visibility into potential forced labor linkages and to facilitate supplier compliance to our codes and policies. Outlined below is our approach for operationalizing the Enphase Supplier Code of Conduct and Policy Against Forced Labor through entity screening, risk tiering, and supplier engagement activities.

### Supplier risk assessment

We conduct systematic forced labor risk assessments across our supply chain using a third-party due diligence screening platform, complemented by additional modern slavery indicators including sector and industry, the type of products and services, geographical location and specific entity risk. This process is designed to identify, assess, and prioritize potential forced labor risks across direct and indirect supplier relationships. The screening identifies whether a supplier is (i) directly related (Tier 1), (ii) adjacent (Tier 2–3 proximity), or (iii) sub-tier ( $\geq$ Tier 3).

Forced labor risk is categorized based on proximity within the supply chain:

- Tier 1: Direct suppliers to Enphase
- Tier 2: Suppliers to Enphase’s direct suppliers
- Tier 3+: More remote sub-tier suppliers or service providers

Risk levels are defined as follows:

Risk Level	Definition
<b>High Risk</b>	Forced labor linkage identified at Tier 1 or Tier 2, particularly where the risk relates to core manufacturing inputs or components.
<b>Medium Risk</b>	Forced labor linkage identified at Tier 3 or beyond, where the supplier confirms the relationship and corrective action is required and initiated.
<b>Low Risk</b>	Forced labor linkage identified at higher tiers that has been resolved through supplier corrective actions, substitution of sub-tier providers, or confirmation that the linkage is no longer active.

Suppliers may be flagged for forced labor risk if they are (i) directly identified as a forced labor entity, or; (ii) Indirectly linked to forced labor through upstream or downstream relationships (e.g., sub-tier suppliers, logistics providers, freight forwarders, or service providers that have been identified or alleged to be involved in forced labor). Importantly, a flag does not automatically indicate that a supplier itself engages in forced labor – it only indicates a potential linkage that requires further assessment.

Among flagged suppliers, we prioritize those risks closest to our products (Tier 1 and 2 suppliers), while continuing to investigate and mitigate sub-tier linkages.

### Actions to address risk

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery. Below are outlined our due diligence processes to maintain supplier compliance with the expectations set forth in our codes and policies.

## ***Policies and procedures***

We have a number of policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks, including:

- Enphase Policy Against Forced Labor that establishes our commitment to complying with all relevant forced labour laws and prohibiting the use of forced labour throughout our supply chain.
- Enphase Supplier Code of Conduct that sets out prohibitions and requirements for our suppliers related to forced labour, including specific prohibitions on prison labour, forced child labour, transactions with high risk entities, and sourcing from regions covered by CBP Withhold Release Orders. The Code was rolled out to all suppliers through our supplier certification process.
- Whistleblower Policy that supports and encourages employees to raise concerns without fear of retaliation or that their future employment prospects will be adversely affected.

## ***Contracts and supplier engagement***

Suppliers are contractually required to acknowledge and abide by the Enphase Supplier Code of Conduct, and we expect suppliers to cascade equivalent standards to sub-suppliers and to maintain documentation demonstrating conformance.

## ***Training and capacity building***

Enphase recognizes that effective risk management and compliance with its Supplier Code of Conduct and Policy Against Forced Labor depend not only on formal requirements, but also on awareness, understanding, and accountability across both its internal organization and upstream value chain. Training plays a central role in embedding these expectations into everyday decision-making and operational practices.

Enphase provides mandatory training to internal employees whose roles may influence supplier selection, sourcing decisions, logistics, trade compliance, or supply chain risk management. This includes employees within procurement, supply chain, operations, logistics, trade compliance, and related support functions. Annual code of compliance refresher training is required for all applicable employees and reinforces Enphase's commitment to ethical conduct, human rights, and the prohibition of forced labor.

Completion of training is tracked, and participation rates are used as an indicator of internal compliance effectiveness. Training requirements are complemented by functional guidance, procurement playbooks, and ongoing communications, reinforcing expectations beyond formal training modules and supporting continuous learning.

In addition to internal training, Enphase uses targeted communication to drive compliance among suppliers and upstream value chain entities. Enphase communicates its expectations regarding forced labor through contractual requirements, onboarding materials, and formal acknowledgement of the Supplier Code of Conduct and Policy Against Forced Labor. These communications clarify suppliers' obligations to prohibit forced labor in their own operations and throughout their supply chains.

Where suppliers are identified as higher risk, Enphase engages more directly through enhanced due diligence, corrective action processes, and focused discussions to ensure suppliers understand both the nature of the risk and the actions required to remediate it. These engagements function as a form of applied training, helping suppliers strengthen their own risk management practices, improve transparency, and build awareness within their organizations and sub-tier supply chains.

Suppliers may be required to provide attestations, documentation, or other evidence demonstrating that appropriate controls and training are in place within their own operations. Where appropriate, Enphase encourages suppliers to cascade expectations and training requirements to their subcontractors, logistics providers, and other upstream partners, supporting broader awareness and alignment across the value chain.

Training effectiveness is reinforced through Enphase's broader governance and monitoring framework. Insights gained from supplier engagements, corrective action reviews, and risk assessments are used to refine training content and guidance provided to both employees and suppliers. Common issues, recurring risks, or gaps identified during due diligence reviews inform updates to internal refresher training and supplier communications.

## **Remediation processes**

When a supplier is identified or flagged as presenting potential non-compliance with Enphase policies and procedures relating to the prohibition of forced labor, Enphase follows a structured remediation process designed to promptly address risk, prevent recurrence, and ensure alignment with applicable laws and standards. This remediation framework reflects a risk-based, proportionate approach that considers the nature, severity, and proximity of the identified forced labor risk within the supply chain.

Upon identification of a potential forced labor linkage, Enphase engages the relevant supplier through its procurement and commodity teams to formally communicate the concern. Suppliers are provided with information regarding the basis of the flag and are requested to acknowledge, clarify, or rebut the findings. Where necessary, suppliers must disclose the extent of the identified linkage within their own supply chain, including the tier at which the risk occurs and whether it affects goods or services supplied to Enphase.

If a forced labor linkage is confirmed, Enphase requires the supplier to implement timely and measurable corrective actions. These actions may include, as appropriate, removing or replacing non-compliant sub-tier suppliers, changing logistics or service providers, strengthening internal due diligence processes, or modifying sourcing practices to eliminate the identified risk. Suppliers may be required to submit written corrective action plans, affidavits, or other formal attestations demonstrating that remedial steps have been taken and that forced labor has been effectively excluded, in whole or in part, from the relevant supply chain.

The adequacy and timeliness of corrective actions are assessed by Enphase based on the level of risk and the supplier's responsiveness. Suppliers that cooperate in good faith, demonstrate transparency, and implement effective remediation measures may continue to do business with Enphase, subject to enhanced monitoring. Where remediation involves changes at more remote tiers of the supply chain (e.g., logistics or service providers), Enphase may require follow-up confirmations or periodic re-screening to ensure that corrective actions remain in effect.

Suppliers are escalated and deemed higher risk if they fail to cooperate, are unwilling or unable to implement corrective actions, or if forced labor concerns persist at direct or near-tier levels of the supply chain. In such cases, Enphase evaluates whether continued commercial engagement is appropriate. This evaluation may result in additional remediation demands, suspension of new business, or, where remediation is not feasible or effective, termination of the supplier relationship.

All remediation actions, communications, and outcomes are documented and retained to support regulatory compliance obligations, including those related to forced labor and import regulations, as well as Enphase's internal governance and reporting requirements. Through this remediation framework, Enphase seeks not only to address identified risks, but also to drive continuous improvement in supplier practices and contribute to the broader effort to prevent and eradicate forced labor across its global supply chain.

## **Assessing our effectiveness**

Enphase is committed to continuously evaluating the effectiveness of its due diligence processes to ensure supplier conformance with the expectations set forth in its Supplier Code of Conduct and Policy Against Forced Labor. This assessment is designed to confirm that identified risks are appropriately addressed, corrective actions are effective, and Enphase's overall approach to forced labor risk management remains responsive to evolving regulatory and operational expectations.

The effectiveness of Enphase's actions is assessed through a combination of quantitative performance metrics, qualitative review mechanisms, and governance oversight, which together provide a comprehensive view of how forced labor risks are identified, managed, and remediated across the supply chain.

Governance and oversight are central to Enphase's effectiveness assessment. ESG and Operations leadership periodically review forced labor KPIs, trends, and significant cases to evaluate whether existing risk management processes remain appropriate and effective. These reviews inform refinements to due diligence procedures, escalation thresholds, and monitoring cadence. Key outcomes and aggregated performance metrics are consolidated into Enphase's annual sustainability and modern

slavery reporting, providing transparency into how risks are managed and how performance evolves over time.


Enphase also evaluates the alignment of its due diligence practices with relevant regulatory and governmental guidance, including applicable modern slavery reporting frameworks and guidance issued by authorities such as the Australian Attorney-General's Department. This includes assessing whether risk identification is sufficiently clear, whether corrective actions are proportionate to the severity of identified risks, and whether consultation and engagement processes are effective. Feedback from these assessments is used to strengthen reporting quality and improve internal controls.

## Consultation

Enphase Energy, Inc. consulted with Enphase Energy Australia Pty Ltd by providing a copy of this statement to the board of that company for review and offering it the opportunity to comment on the document. Prior to being presented to the Board of Directors of Enphase Energy Australia Pty Ltd for review and approval, this statement was reviewed by relevant internal teams, including Operations, Global Trade Compliance, Procurement, Commodity Management, and Legal.

This statement was approved by the Board of Directors of Enphase Energy Australia Pty Ltd.

This statement is signed by a director of Enphase Energy Australia Pty Ltd on February 20, 2026.

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Ya-Ling Yang  
Director

## Statement Annexure

### ***Mandatory criteria***

This statement complies with the mandatory criteria for a modern slavery statement outlined in section 16 of the *Modern Slavery Act 2018* (Cth). The below table indicates where each requirement is addressed in this statement.

Requirement	Page Number
(a) Identify the reporting entity.	1
(b) Describe the structure, operations and supply chains of the reporting entity.	1
(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	2
(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	3 and 4
(e) Describe how the reporting entity assesses the effectiveness of such actions.	4 and 5
(f) Describe the process of consultation on the development of the statement with any entities that the reporting entity owns or controls (if a joint statement has been made under section 14, also describe the process of consultation with the entity giving the statement).	5
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	n/a