

Our Commitment to Human Rights

At Enphase, we acknowledge and take seriously our responsibility to protect, preserve, and promote human rights around the world. As we expand our global reach and impact, the need for vigilance and due diligence regarding human rights issues throughout our operations will grow, and we are committed to ensuring that the people and communities impacted by our business are able to live a life of liberty, dignity, and respect. Our internal codes and policies on human rights are rooted in established frameworks and conventions including:



[United Nations Universal Declaration on Human Rights](#)



[The Code of Conduct of the Responsible Business Alliance \(RBA\)](#)



[The United Nations Guiding Principles for Business and Human Rights \(UNGPs\)](#)



[OECD Guidelines for Multinational Enterprises](#)



[International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)

Our Commitment to Human Rights (continued)

Beyond the fundamental rights defined in these instruments, we also consider access to clean, reliable, and affordable energy as a basic human right and a prerequisite for achieving the 2030 United Nations Sustainable Development Goals (UN SDGs). Access to energy helps to alleviate poverty, improve health, reduce inequality, and raise standards of living. For us at Enphase, we believe securing a rapid and equitable clean energy transition advances human rights globally and are pleased that our expanded product and service offerings in both developed and emerging markets will help promote human rights, health, and dignity around the world.

Access to Water

As with energy, we consider access to clean, sanitary freshwater a basic human right, foundational for achieving the 2030 UN SDGs. We strive to comply with all environmental laws designed to conserve freshwater within our own operations and, moreover, expect our upstream suppliers and vendors to take the necessary measures to ensure responsible use of water reserves.

Business Relationships

At Enphase, we seek to do business with those who share our values and stance on human rights and expect employees, business partners, suppliers, and vendors across all operations and geographies to acknowledge and abide by our codes of conduct, including the policy aspects outlined herein. At minimum, we expect our business partners to uphold basic human rights pertaining to minimum wage, maximum working hours, freedom of association and the right to collective bargaining, corporal punishment and disciplinary practices, acceptable living conditions, non-discrimination, and compliance with health and safety laws as defined in domestic and international conventions and frameworks.

Non-discrimination

We are building a community where everyone feels valued and treated equally at Enphase. As an Equal Opportunity Employer (EOE), we are committed to diversity and inclusion in the workplace, and do not tolerate discrimination, harassment, or retaliation of any kind based on race, color, sex, gender, gender expression, religion, sexual orientation, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status, pregnancy, military or veteran status, or any other protected characteristic as outlined by federal, state, or local laws. This policy applies to all employment practices within our organization, including hiring, recruiting, promotion, termination, layoff, recall, leave of absence, compensation, benefits, training, and apprenticeship, and we expect all business partners, suppliers, and vendors to abide by the same standards, including respecting the rights of minorities and women.

Our Commitment to Human Rights (continued)

Eradication of Forced Labor and Human Trafficking in Supply Chains

It is our intention and policy to conduct our business with integrity and to rely on our employees and partners to follow appropriate ethical and legal business practices. We take the issues of slavery and human trafficking very seriously and will continue doing our part by responsibly managing our supply chains to eradicate human trafficking and slavery. As stated in Section 15 of the Vendor Code of Conduct, our suppliers must not support, promote, or engage in the practice of forced labor, child labor, slavery, or human trafficking. Our Vendor Code of Conduct requires our suppliers, its next tier suppliers, and subcontractors to comply with all international standards and applicable laws regarding slavery and human trafficking and to conduct due diligence of their operations to verify compliance that the materials used in our products comply with laws regarding human trafficking and slavery.

Materials Sourcing and Conflict Minerals

We are committed to following all material guidance and environmental regulatory compliance requirements in all the countries in which we operate and sell. We do not use cobalt in our batteries as this mineral represents an increased risk of being sourced from the Democratic Republic of the Congo (DRC) and other conflict-affected areas associated with unfair labor practices. We expect our suppliers to source materials and operate in a responsible manner consistent with the Organization for Economic Cooperation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Our SEC conflict minerals disclosure on responsible sourcing is updated annually and posted on our website. For additional information, please refer to our most recent conflict minerals report and conflict minerals policy.

We expect our suppliers to acknowledge and agree to the following terms with respect to conflict minerals:

- Acknowledge that Enphase is required to meet the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act
- Agree to provide Enphase with conflict mineral content and country of origin information on products supplied to Enphase
- Agree to cooperate in Enphase or independent third-party auditing of supply chain and procurement process, conflict mineral audits, and due diligence on its suppliers
- Agree to collaborate with Enphase in developing a chain of custody for conflict minerals in the supply chain and identifying and sourcing conflict-free sources for minerals used in Enphase products

Our Commitment to Human Rights (continued)

Supplier Selection and Auditing

The success of our products would not be possible without positive and long-lasting relationships with suppliers and partners that share our values of integrity, quality, design, and sustainability. We work closely with all our contract manufacturers, from onboarding to customer delivery, to ensure that our products are made while adhering to the highest ethical, environmental, and socially responsible standards.

We provide a Supplier Quality Assurance Manual that outlines our expectations of new and existing partners. We are committed to producing high quality, reliable, and cost-effective products that are shipped on time, provide customer value, and conform to national and international requirements. We and our customers demand and expect defect-free products and services and we recognize the importance of suppliers in providing quality parts and raw materials on time so that customers' expectations can be met. All potential suppliers are rigorously screened for quality, including performance on environmental and social factors.

Grievance and Remedy

Grievance mechanisms are available, including the use of anonymous reporting to a third-party whistleblower hotline available 24 hours a day, seven days a week, when instances of non-compliance with the Enphase Energy Code of Conduct (Code of Conduct) or Vendor Code of Conduct are observed or reported. Remediation actions are taken through corrective action plans involving managers and executive sponsors, and the Audit Committee of the Board of Directors when appropriate. Remediation actions are taken through corrective action plans involving managers and executive sponsors, and the Audit Committee of the Board of Directors when appropriate.

Stakeholder Involvement and Communication

Our success depends largely on meeting the needs of a wide variety of stakeholders including employees, investors, suppliers, business partners, customers, policy makers, non-governmental organizations, and the communities in which we operate and serve. We engage in regular conversations with these groups and solicit feedback to ensure our business activities remain well-aligned with their values and needs.

Conducting Due Diligence

We are committed to protecting human rights, enforcing fair labor practices, and addressing the potential risks of forced labor, child labor, human trafficking, and slavery across our operations and supply chain. We continue to strengthen our processes for assessing supply chain risk exposure, with director-level oversight and reporting on an annual basis to the Board of Directors.

Employee Training

Training on human rights, including human trafficking and slavery, is provided to new hires during the onboarding process. These materials are made available at any time through the Enphase Learning Academy, accessible to all employees at all times.