



California Transparency in Supply Chains Act Disclosure

Enphase Energy, Inc. and its subsidiaries (collectively, "Enphase") strive to achieve and maintain the highest possible standards of corporate integrity and ethical behavior. Enphase expects that its suppliers will conduct their businesses not only in a lawful manner but also in compliance with the same high standards of integrity and ethics.

In order to establish guidelines for such standards, Enphase has established a Supplier Code of Conduct. The Supplier Code of Conduct sets forth and highlights important legal, ethical, behavioral and other requirements for parties that wish to be Enphase suppliers. Specifically, the Supplier Code of Conduct states that suppliers must not support, promote or engage in the practice of slavery or human trafficking, and it requires suppliers to comply with all international standards and applicable laws regarding slavery and human trafficking. Enphase suppliers are further expected to take reasonable and necessary steps to help ensure that their sub-contractors and sub-suppliers also comply with all international standards and applicable laws regarding slavery and human trafficking.

At this point, Enphase does not engage in verification of product supply chains to evaluate or address the risks of human trafficking and slavery, audit suppliers to evaluate compliance with Enphase standards for human trafficking and slavery in supply chains, or require suppliers to certify that the materials incorporated into their products comply with laws regarding human trafficking and slavery. However, Enphase provides its suppliers with a Quality Assurance Manual that outlines our



appropriate laws and regulations regarding slavery and human trafficking. It is our expectation that they do not support, promote or engage in slavery and human trafficking and that slavery and human trafficking do not exist in their respective organizations and supply chains. Enphase suppliers also may be asked to cooperate with Enphase in an annual verification of the absence of human trafficking and slavery in its supply chain through audits of supplier practices and underlying management systems conducted by Enphase. Suppliers are expected to promptly take corrective action to address any deficiencies identified with respect to compliance with Enphase's Supplier Code of Conduct. If a supplier is found to be in violation of the Supplier Code of Conduct, Enphase will take prompt, remedial measures to address the violation.

Enphase also has established a Code of Conduct, which applies to all Enphase personnel, including employees and board members (collectively, "Employees"). Enphase expects its business partners and contractors to share the general principles stated in the Code of Conduct. The Code of Conduct requires Enphase Employees to comply with all applicable laws and regulations, including but not limited to those relating to human trafficking and slavery. While Enphase does not provide specific training on human trafficking and slavery, the Code of Conduct explains that if an Employee needs guidance on a legal or ethical question or has witnessed or has knowledge of an illegal or unethical activity, he or she should consult with or report the matter to his or her supervisor, Enphase's Compliance Officer, the Compliance Hotline and/or the Audit Committee of Enphase's Board of Directors, depending on the specific circumstances. All reports of alleged violations will be investigated by Enphase. If the results of an investigation indicate that corrective action is required, the Company will decide the appropriate steps to take, including discipline, dismissal, and possible legal proceedings.

It is Enphase's intention and policy to conduct its business with integrity and to rely on our employees and partners to follow appropriate ethical and legal business practices. Enphase takes the issues of slavery and human trafficking very



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