Transparency in Supply Chains and Modern Slavery Statement

First Solar, Inc. and its subsidiaries and affiliates (collectively "First Solar") is committed to respecting and protecting human rights across our business operations and supply chain. As part of this commitment, we stand against all forms of modern slavery and have zero tolerance for forced labor, human trafficking and child labor.

This statement for the financial year ending 31 December 2025 has been published in accordance with the California Transparency in Supply Chains Act of 2010 (SB 657) and the UK Modern Slavery Act 2015, which require certain businesses to disclose information relating to their efforts to address the risks of modern slavery in their operations and supply chains. This statement refers to First Solar, Inc. and its subsidiaries collectively. A list of First Solar's significant subsidiaries can be found in Exhibit 21.1 of First Solar's Form 10-K, filed with the US Securities and Exchange Commission on 24 February 2026.

1 Our Business and Supply Chain

First Solar is America's leading solar photovoltaic (PV) technology and manufacturing company. The only U.S.-headquartered company among the world's largest solar manufacturers, First Solar is focused on competitively and reliably enabling power generation needs with our advanced, thin film PV technology. Developed at research and development labs in California and Ohio, First Solar's technology provides a competitive, high-performance, and responsibly produced alternative to conventional crystalline silicon PV solar modules. First Solar PV solar modules are produced using a fully integrated, continuous process that does not rely on Chinese crystalline silicon supply chains. First Solar is the world's largest thin film PV solar module manufacturer and the largest PV solar module manufacturer in the Western Hemisphere.

As of 31 December 2025, we had approximately 7,900 associates (our term for full and part-time employees), the majority of which work in the United States, Malaysia, Vietnam, and India. First Solar is headquartered in Phoenix, Arizona, with regional offices around the world and manufacturing facilities in Perrysburg and Lake Township, Ohio; Trinity, Alabama; Iberia Parish, Louisiana; Kulim, Malaysia; Ho Chi Minh City, Vietnam; and Tamil Nadu, India. We are in the process of further expanding our domestic manufacturing capacity, including the construction of our sixth U.S. manufacturing facility to onshore final production processes for modules initiated by our international fleet, which is expected to commence operations in the second half of 2026. We own and operate vertically integrated PV manufacturing facilities, which turn a sheet of glass into a completed module in about 4 hours. This not only results in a quality product with a faster energy payback time and superior traceability but it

ensures our products are manufactured to the highest labor, environmental, health and safety standards.

Our thin film module manufacturing process uses approximately 30 types of raw materials and components to produce a solar module. Critical raw materials and components in our manufacturing process include cadmium telluride, front glass coated with transparent conductive oxide, other semiconductor materials, organics such as adhesives, heat-strengthened back glass, frames, packaging components such as interlayer, junction boxes, wire assemblies and solar connectors. For more information on our supply chain, please refer to our 2025 Corporate Responsibility Report.

2 Our Commitment and Policies

First Solar is committed to complying with the laws established to protect human rights in each country where we operate and respecting the rights set forth in the International Labour Organization (ILO) 1998 Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights, which provide further instruction to companies dedicated to preventing adverse impacts on the communities with which they are involved. In accordance with the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, we are committed to identifying, preventing and mitigating potential adverse human rights and environmental impacts.

First Solar has established minimum requirements for our associates and suppliers in the areas of environmental, health and safety, labor standards, human rights, and business ethics:

- First Solar Code of Conduct: *Relentless Integrity: How We Conduct Business Ethically* ("our Code") is an important resource designed to help us meet our business goals ethically. Our Code provides a firm foundation for the decisions we make and actions we take when conducting business and applies to everyone at First Solar, including all associates, officers, and directors.
- First Solar Labor and Human Rights Policy: Our Labor and Human Rights policy outlines First Solar's commitment to respecting fundamental human rights and protecting the dignity of workers everywhere. Our policy is aligned with the Responsible Business Alliance's (RBA) Code of Conduct and guided by the International Labour Organization 1998 Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights.
- First Solar Conflict Minerals Policy: First Solar is committed to responsible sourcing and operating a supply chain free of conflict minerals. We comply with and support the goals established under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd- Frank Act") on conflict minerals and condemn human rights abuses associated with the extraction, transport or trade of minerals and any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points or any upstream actors in the supply chain.

- RBA Code of Conduct ("RBA Code"): The RBA Code is a set of social, environmental and ethical industry standards. The provisions in the RBA Code are derived from internationally recognized standards including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights, among others. As a member of the RBA, we implement the RBA Code within our operations and our supply chain.

3 Risk Assessment and Due Diligence

From our policy, supplier contracts, screening, mapping and auditing, to training and reporting, First Solar takes a comprehensive approach to responsible sourcing and supply chain management in order to identify, prevent and mitigate potential adverse human rights and environmental impacts:

1. **Verification:** All new suppliers undergo a rigorous qualification process using a balanced scorecard which focuses on Quality, Cost, Flexibility, Service, Technology and Sustainability. We regularly map our supply base and conduct an annual risk assessment to identify potential high-risk suppliers. In 2025, First Solar assessed 100% of our tier 1 suppliers that provide materials and components for manufacturing and 100% of our new suppliers using social and environmental criteria. We leverage third-party tools and indices to identify potential natural disaster, sustainability, human rights, and operational risks based on suppliers' locations. Suppliers may be deemed high risk based on their Self-Assessment Questionnaire (SAQ) score, an alternative risk assessment method, or through the presence of any open disqualifying audit findings. We recognize that the presence of vulnerable groups such as migrant workers is associated with a higher modern slavery risk. In our operations, modern slavery risks are predominantly associated with onsite service providers e.g. security, janitorial, landscaping, warehouse operation and facilities maintenance. We require all major suppliers, including onsite service providers, to complete an RBA SAQ on an annual basis.
2. **Audits and Remediation**: First Solar audits new and existing suppliers on quality as well as environmental management, health and safety, labor, human rights, and ethics by leveraging the RBA Code as a framework. In 2025, First Solar conducted 21 onsite audits at supplier sites based on quality as well as environmental and social criteria. We work with suppliers to drive improvements and to remedy adverse impacts through Corrective Action Plans. We publicly report on the environmental and social performance of the suppliers we audit in our sustainability report on an annual basis.

   In addition to assessing our suppliers, First Solar completed third-party onsite RBA Validated Assessment Program (VAP) audits at our Ohio, Malaysia, and Vietnam manufacturing facilities in 2024 and 2025. First Solar Malaysia, Ohio and Vietnam achieved Platinum, Gold and Silver VAP ratings respectively, outperforming country and industry norms. First Solar is the first – and remains the only – solar manufacturer in the world to have conducted independent, third party on-site social audits on its vertically integrated operations. An audit at a First Solar manufacturing facility is equivalent to auditing a crystalline silicon manufacturer's ingot, wafer, cell, and module assembly facilities.

3. **Contracts:** First Solar's supplier and site service agreements require compliance with applicable laws and regulations in addition to First Solar requirements, which can exceed local legal requirements. Under the terms of First Solar's contract agreements, suppliers and onsite service providers must commit to comply with the RBA Code and require their suppliers and subcontractors to do the same. Suppliers must also represent, warrant and covenant that they will not use child, slave, prisoner or any other form of forced or involuntary labor, or engage in abusive employment in the supply of goods or provision of services. Violation of any labor standards may result in the termination of First Solar's business relationship with such party.
4. **Internal Accountability:** First Solar requires all of our directors, officers and associates to act ethically and requires compliance with First Solar's Associate Handbook and our Code. Our Chief Ethics and Compliance Officer manages First Solar's Global Compliance Organization which oversees our ethics and compliance program. The goal of this organization is to implement policies, processes, training, monitoring and general awareness programs to promote ethics and compliance with applicable legal and regulatory standards. Subject to the requirements of local law, and after due diligence and full and fair investigation, any employee found to have directly engaged in or knowingly engaged suppliers engaged in slave labor or human trafficking will be subject to immediate termination of employment.
5. **Training:** In 2025, First Solar provided a global internal training on forced labor in global supply chains to associates involved in procurement, legal and global trade compliance. The training includes recognizing signs and indicators of forced labor, addressing the risks of forced labor in supply chains, and how to report concerns. Associates are also required to acknowledge First Solar's Labor and Human Rights Policy as well as the RBA Code of Conduct. Additional training is available to First Solar associates and suppliers via the RBA e-learning academy.
6. **Ethics Hotline:** First Solar has established a third-party operated Ethics Hotline to provide an anonymous and confidential solution to communicate serious legal, financial, ethical or human rights concerns. No human rights concerns were reported in 2025. The Ethics Hotline ensures that serious concerns are heard and are acted upon immediately. Any associate, employee of First Solar, supplier and other external stakeholder can report concerns toll-free via our Ethics Hotline.

First Solar has a long-standing commitment to conducting business in compliance with applicable laws and regulations and in accordance with the highest ethical principles. We recognize that due diligence is an ongoing process, and we will continue to work with our suppliers to ensure they conduct their business in line with First Solar values to help improve the lives of workers across our supply chain. We recognize that eradicating forced labor from supply chains requires companies to uphold a single global standard of zero tolerance for forced labor across their entire supply chain.

This statement was approved by the Board of Directors of First Solar on 23 April 2026 and signed by Mark R. Widmar, Chief Executive Officer and Director.