

# ANTI-CORRUPTION MANAGEMENT STATEMENT



# Sungrow Power Supply Co., Ltd. Anti-corruption management statement

Sungrow Power Supply Co., Ltd. ("Sungrow" or the "Company") has always had a zero tolerance attitude towards corruption and has taken all necessary measures to prevent and combat corruption. The company believes that commercial corruption affects fair competition in the market, has a very bad impact on the society, the economy and the development of the enterprise itself, and knows that the success of the company depends not only on the quality of products or services, but also on the moral quality and code of conduct of employees.

The company formulated this statement to explicitly prohibit all commercial corruption, including any form of bribery, embezzlement, bidding collusion, infringement of trade secrets and other illegal acts, in order to promote the healthy and sustainable development of the company. The company requires that all employees of Sungrow shall not bribe or disguise bribes to public officials or partners in any way to obtain business opportunities, nor shall they use their power or position to take bribes or disguise bribes and seize company assets; Partners (including customers, suppliers, distributors, service providers, intermediaries and other business partners) are also not allowed to offer bribes or disguised bribes to Sungrow employees.

This statement applies to Sungrow and its subsidiaries and branches that are directly or indirectly controlled worldwide.

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# Improve internal control system



The Audit Committee under the Board of Directors of the Company(Board-level committee), as the highest management body of anti-corruption work, is fully responsible for the integrity construction of the company's various business systems, including the supervision and implementation of the company's internal audit system and the formulation of guidelines for the company's integrity construction. The company has set up a first-level department of audit and inspection to independently carry out the company's audit and supervision work, establish comprehensive rules, regulations and processes with anti-corruption as the core, investigate employees who violate the company's integrity management system, and report key work to the Audit Committee every quarter.

# Implementing anti-corruption measures



## Conduct anti-corruption investigations

In accordance with the Provisions for the Management of Internal Audit Supervision, the Company regularly or irregularly conducts anti-corruption investigations on all functional centers, business divisions and subordinate units. Since 2024, the Audit and Inspection Department has conducted anti-corruption investigations every three years at major operating sites to monitor compliance with the company's policies, including anti-corruption policies.

## Promote a clean culture

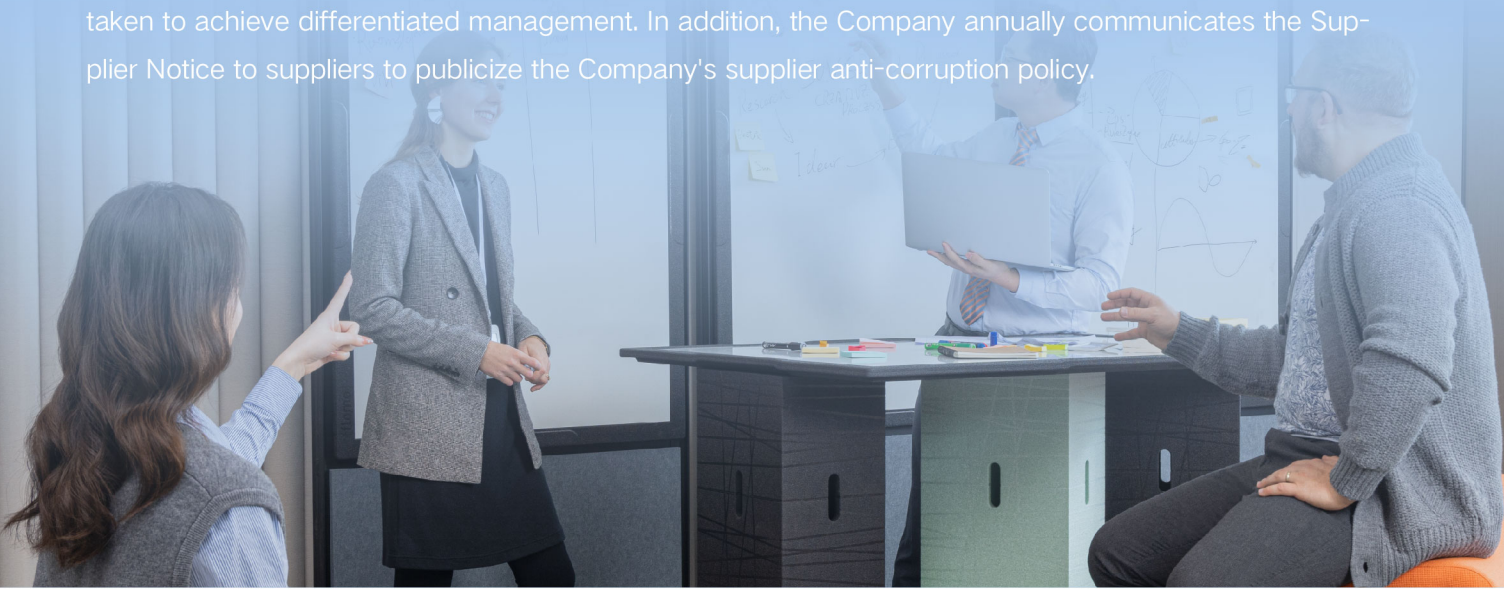
The company attaches importance to the construction of a clean culture, through training, publicity and other ways, to carry out anti-corruption education for employees and partners, promote a clean and disciplined corporate culture. The company's integrity education and training methods, including but not limited to:



- Sign the Code of Conduct and Self-discipline Commitment Letter with employees (see Annex 1 for details), and provide anti-corruption and ethical standards training for all employees (including part-time employees and contractors ) every year. And organize examinations to further strengthen employees' awareness of integrity. All new employees participate in integrity training and learn the company's internal rules and regulations such as Employee Manual, Compliance Code of Conduct and Employee Integrity and Self-discipline Management Regulations.
- Operate the "Integrity Sungrow" wechat public account, operate the ISG integrity compliance service account, and regularly publish festival integrity reminder and warning cases.
- Honesty management will be included in the comprehensive quality assessment and related evaluation and assessment, and employees who violate the Employee Integrity and Self-discipline Management Regulations will be deducted all performance salary and bonus of the year according to the circumstances.
- Regularly send integrity letters to partners to strengthen self-restraint.


## Supplier anti-corruption management

During the supplier access stage, the Company requires all suppliers to sign the Integrity Agreement (see Annex II for details), have anti-corruption policies and verifies the suppliers' compliance with the Integrity Agreement policy by conducting regular spot checks and sending integrity letters. The Company has formulated the "Supplier Blacklist Management Provisions" to strengthen the company's punishment of suppliers for breach of contract and breach of trust, prevent commercial bribery and malicious fraud, and regulate the clean work behavior of personnel at all levels; Suppliers with corruption and bribery should be managed according to their influence and harm degree, and different disciplinary measures should be taken to achieve differentiated management. In addition, the Company annually communicates the Supplier Notice to suppliers to publicize the Company's supplier anti-corruption policy.





# Establish reporting and supervision mechanisms



## Reporting methods and procedures

The company formulated the Provisions on the Management of Reports and Complaints, and established efficient, unimpeded, open and transparent complaints and complaints channels. Informants can report and complain about matters that do not conform to the code of business ethics 24 hours a day through the telephone hotline (0551-65327830), mobile phone (18655168110 with the wechat account), E-mail (complain@sungrowpower.com). The Audit and Inspection Department shall, in accordance with the Provisions for the Management of Internal Audit Supervision, accept all kinds of reports and complaints that violate business ethics and damage the interests of the company, employees and partners, and arrange a centralized department to investigate and deal with them. If the informant has objections to the processing results, he has the right to apply to the competent leader of the investigation department for a ruling to ensure that the processing results are fair and just.

## Whistleblower protection measures

The Company gives rewards and protection from retaliation to whistleblowers, and rewards the whistleblowers who provide effective clues and evidence and help verify the truth according to the appropriate proportion of the verified amount. The Company shall strictly keep confidential the information of whistleblowers, protect the personal safety and legitimate rights and interests of whistleblowers, informants and their close relatives, and no one shall discriminate against or retaliate against them. Violators shall be severely punished according to the Provisions on the Management of Employee Rewards and Punishments, such as the transfer of a crime to the national judicial organs.

Sungrow hopes employees and partners to maintain the company's good reputation and healthy development together, but also look forward to everyone can actively participate in the action against corruption, and jointly create an honest and clean ecosystem.

# Annex I

## Code of Conduct and Self-discipline Commitment Letter

In order to implement the Compliance Code of Conduct and the Employee Integrity and Self-discipline Management Regulations, practice the company's core values, correctly exercise work duties, enhance the awareness of integrity, and strengthen self-restraint, we hereby make the following commitments to the company (Sungrow Power Supply Co., Ltd. and its participating, holding subsidiaries, branches, etc.) :

A. I have completed the study of the Employee Manual, Compliance Code of Conduct, and Employee Integrity and Self-discipline Management Regulations issued by the company, clearly understand the firm position and requirements of Sungrow on integrity and compliance, and deeply realize that violations of integrity and compliance are inviolable red lines; Understand the latest compliance policies that will be released by the company through its official website, OA Intranet, Ding talk and email, etc., and promise to start from oneself, consciously study the law, understand the law, abide by the law, strictly abide by all laws and regulations, regulatory requirements and rules and regulations, supervise subordinates and oneself, and carry out work diligently and due diligence.

B. I recognize the importance of compliance to the sustainable development of the company, and promise to act with high standards of professional ethics, integrity, honesty and trustworthiness, love and dedication, and maintain the company's reputation; Abide by the principles of compliance management, embed compliance management ideas in all aspects of management, and seek advice or guidance in a timely manner when unsure of what actions should be taken, so that everything is compliant and always compliant.

C. I abide by relevant laws and regulations and company rules and regulations, abide by professional ethics, and practice the company's core values.



I promise that I and my close relatives shall comply with the following requirements when dealing with partners (including suppliers, distributors, customers, banks, intermediaries, other partners, etc.) and their employees, including but not limited to:

- Do not ask for or accept any nominal cash, transfers, securities, loans and disguised loans, property cards, valuables, etc.; No nominal capital transactions occur; If it is impossible to refuse, inform the Audit and Inspection Department within 24 hours and hand over the property to the company.
- No reimbursement of expenses from partners; Do not accept partner arrangements that may affect business activities such as banquets, entertainment, gambling, travel and other activities.
- No business transactions with partners and their employees, including but not limited to: decoration, furniture purchase, IT products, private services, etc., except that the business transactions are at a fair price and there is no business docking relationship.
- Do not work in the partner or part-time (if there are close relatives working in the supplier before the business, they should report to the company and apply for withdrawal in the actual business); Except for the public offering of shares by the listed company, it does not hold shares in the partner and its affiliated companies.
- Shall not pay bribes to partners and state staff, and shall not carry out business through other illegal means.
- There shall be no transfer of other substantial interests between partners and their employees.

Other actions you promise not to participate in:

- Provide false reimbursement or payment requests, and provide false invoices and notes to the company.
- Stealing property of the company or colleagues; Submitting false information or materials to defraud the company in the process of employment and employment.
- Forged the signature of superior or other personnel of the company, embezzled the company's seal; Unauthorized use of the company's name to carry out business; Signed without authorization in the name of the company without real business contracts, receipt, receipt, receipt, etc.
- Falsifying or providing false financial, operating and business data, and artificially adjusting income, profit and other performance indicators.



- Make use of the company's customers or other resources, make private deals, and introduce customers to other competitors.
- Without the consent of the Company, participate in the investment or operation of the purchase and sale of the same or similar commodities with the Company; Or engage in director, supervisor, manager or other substantive business management work in other companies.
- Other acts that are subjective and intentional and seriously harm the interests of the company.

D. I am aware of the company's integrity and compliance systems, and promise to raise my awareness, report to my superiors in time in case of emergencies, actively cooperate with internal and external supervision and inspection, find existing or potential compliance problems of the company, and timely report to the direct leadership, Legal and Compliance Department or the Audit and Inspection Department.

The above content is a voluntary commitment made on the basis of my full recognition of the company's core values and system, and I am willing to accept the supervision of the company. If there is any violation of the above commitments, the company will voluntarily accept all treatment, including but not limited to termination of the labor contract, handing over illegal income to the company and compensating the company's losses, canceling the stock or options provided by the company, and being included in the blacklist of Trust and Integrity Enterprise Alliance.

Promisor:

Id Number:

Post position:

Date:



# Annex II



## Integrity Agreement

In order to ensure a healthy and sustainable cooperative relationship between Party A and Party B in the business process of procurement activities, engineering construction, business services and other business, and to ensure the honesty, fairness, integrity, transparency and compliance of the cooperation between the parties, Party A and Party B have reached an agreement to sign this agreement, which is the premise and basis of all cooperation between the parties. Party A and Party B hereof include their respective affiliates.

A. Both parties shall abide by the Anti-Unfair Competition Law, the Criminal Law, the Civil Code and other laws and regulations and business ethics of the State, ensure that the legitimate rights and interests of the other party are not infringed, and bind their respective staff to strictly abide by it.

B. Party A requires that employees of the Company shall not receive any gifts, banquets, red envelopes, bribes or loans, and shall not reimburse Party B for any expenses that should be paid by Party A and its staff in accordance with the principles of honesty, integrity, respect and fairness. Party A's employees shall not require or accept Party B to provide convenience for them and their close relatives in their study, job search, house purchase, decoration, wedding, funeral or other private affairs, and shall not hold any position (including but not limited to shareholder, director, consultant, etc.) in Party B or its affiliated companies. Party A requires the relevant personnel to operate in strict accordance with the procurement system, supplier management system, inspection system and financial system formulated by the Company. Party B fully understands and actively cooperates with this.

C. Party A's staff shall follow the principle that the best interests of Party A are satisfied in each negotiation, technology docking, procurement and project bidding process, and any activities that affect or damage Party A's interests during the transaction shall be prohibited. Party B understands and accepts this provision, and shall inform Party A truthfully once it finds the above behaviors of Party A's staff.





- If Party A finds and verifies that Party B and its personnel actively commit acts in Article 4 to Party A's personnel, or passively commit acts to Party A's personnel but conceals from Party A, regardless of the amount, Party A has the right to freeze the funds in the account of Party B, cancel the qualification of the supplier, and require Party B to pay liquidated damages according to the higher of the rated standards.
- If Party B's bribery acts meet the standards for filing criminal cases, Party A shall reserve the right to report to the judicial authorities.
- If Party B reports violations of other suppliers of Party A, it will give Party B the same incentive treatment as paragraph A of this article once it is verified.

G. Legal Effect: This Agreement shall come into force upon being signed and sealed by both parties. This Agreement shall remain in force until an updated version of this Agreement is signed. If both parties have signed a Integrity Agreement before, this agreement shall prevail. This Agreement is an integral part of all business contracts signed by both parties and has the same legal effect as business contracts.

H. Dispute Resolution: This Agreement is signed in Hefei High-tech Industrial Development Zone, Anhui Province, and shall be governed by and construed in accordance with the laws of the People's Republic of China. Any dispute or dispute in connection with this Agreement shall be settled through friendly negotiation. If no settlement can be reached through negotiation, the dispute shall be settled by the people's court with jurisdiction in the place where Party A resides. Attorneys' fees, investigation fees, notary fees, litigation fees and other fees related to dispute resolution shall be borne by the losing party unless otherwise arranged in the outcome of the lawsuit.

I. Duplicate Agreement: This Agreement is made in duplicate, with each party holding one copy. Faxed copies and photocopies of this Agreement shall be deemed as originals and shall have the same legal effect as the originals.

## ANTI-CORRUPTION MANAGEMENT STATEMENT 2024V1

### Sungrow Power Supply Co., Ltd.

No.1699 Xiyou Rd, High-tech Industry Development Zone, Hefei, Anhui Province, China  
Postcode: 230088

Telephone: +86 551 65327878

Fax: +86 551 65327800

Website: [www.sungrowpower.com](http://www.sungrowpower.com)



Sungrow Youtube Account



Sungrow LinkedIn Account



Sungrow Facebook Account



Sungrow X Account



Sungrow Official Website



Sungrow Official WeChat