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SUNGROW

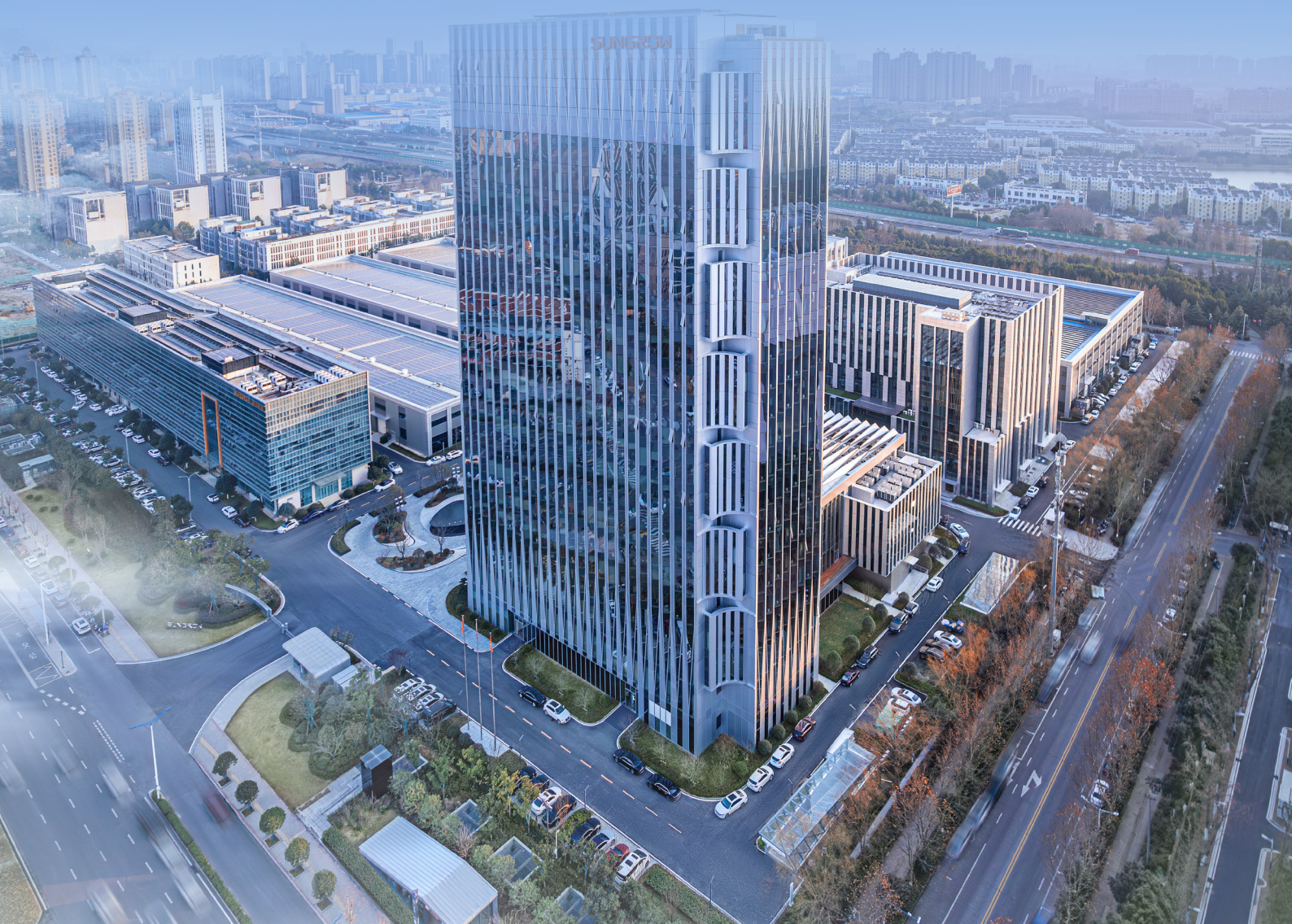
ENVIRONMENTAL MANAGEMENT POLICY

Clean power for all

01 Environmental Management Policy

As a global clean energy enterprise, Sungrow Power Supply Co., Ltd. (hereinafter referred to as "Sungrow" or "the Company") adheres to the environmental principle of "green and energy-saving, pollution prevention, commitment to clean and efficient," as it is dedicated to delivering world-class, full-lifecycle clean energy solutions. With a strong focus on reducing reliance on traditional fossil fuels and actively contributing to the reduction of greenhouse gas emissions, Sungrow aims to drive the green transition of the global energy structure and foster sustainable development in collaboration with its partners. The Environmental Management Policy (hereinafter referred to as "this Policy") has been formulated to establish standardized principles, requirements, and practices for the Company's environmental management.

This Policy applies to Sungrow Power Supply Co., Ltd. and its subsidiaries, covering the Company's production and business operations, products and services, transportation and distribution, waste management, due diligence, mergers and acquisitions, etc. The Company also requires its suppliers, service providers, contractors, and other major business partners to comply with this Policy or equivalent regulations and standards.



Develop a Robust Environmental Management System

Sungrow strictly complies with applicable environmental laws and regulations, including but not limited to the *Environmental Protection Law of the People's Republic of China, Atmospheric Pollution Prevention and Control Law of the People's Republic of China, Water Pollution Prevention and Control Law of the People's Republic of China, Law of the People's Republic of China on Noise Pollution Prevention and Control, Law of the People's Republic of China on the Prevention and Control of Environmental Pollution by Solid Waste, Law of the People's Republic of China on Environmental Impact Assessment,* and other local laws and regulations in the jurisdictions where the Company operates, to fully implement environmental compliance requirements.

The Board's Strategy and Sustainability Committee (a Board-level committee) serves as the highest decision-making body, responsible for governance and supervision of environmental matters, monitoring and evaluating environmental performance indicators, and assuming ultimate accountability for the implementation and effectiveness of environmental initiatives. The ESG Development Center's EHS Management Department acts as the central coordinating body to guide and supervise the comprehensive implementation of environmental initiatives across all business units and subsidiaries.

The Company is committed to fully integrating environmental policies into its corporate governance and development strategy. It has established key regulations such as the *Environmental Management Policy, Pollutant Environmental Protection Regulations, Resource Conservation Management Guidelines,* and *Management Regulations for Non-Value and Obsolete Materials,* embedding environmental management as a core component of its sustainability.

The Company is committed to promoting the coverage and continuous improvement of its Environmental Management System (EMS). The EMS encompasses all production and operational sites and is certified under the ISO 14001:2015 standard.

Internal and external EMS audits are conducted regularly. An independent external audit is carried out at all production and operational sites at least once every three years. Identified issues are reported and assigned to the responsible departments for rectification and closure, with follow-up actions incorporated into key areas of supervision, aiming to drive continuous improvement in environmental performance.

Consolidate the Commitment to Environmental Certifications

Sungrow is committed to the continuous advancement and enhancement of environmental management system certifications, including but not limited to the following areas:

- **Core Environmental Management Certifications:** Maintain and continuously improve the ISO 14001:2015 Environmental Management System, promote internationally recognized standards for greenhouse gas accounting and verification, and implement Environmental Product Declarations (EPD) certifications.
- **Specialized Environmental Management Certifications:** Advance the certification of Energy Management System to enhance energy efficiency, and pursue certification related to product carbon footprint.
- **Comprehensive Sustainability Certifications:** Participate in the major international sustainability rating schemes to continuously improve performance in environmental management domain, and support supply chain partners in obtaining responsible sourcing certifications such as Green Supply Chain labels, with the goal of minimizing environmental impacts across the value chain.

Bolster Environmental Management Initiatives

Sungrow is committed to minimizing its environmental footprint—including impacts related to air, water, industrial noise, soil pollution, and waste disposal—through effective prevention and mitigation measures. By reducing energy consumption, improving water use efficiency, lowering noise levels, etc., the Company strives to reduce emissions of hazardous substances and waste, while promoting the sustainable use of resources.

The Company is committed to reducing the potential impacts of hazardous substance emissions and waste on the environment and human health, striving for zero environmental incidents. The Company has established clear environmental goals and management policies and implemented practical measures to support resource circularity.

Hazardous Substances

- **Targets:** By 2025, reduce particulate matter (PM) emissions per unit of product by 75% and volatile organic compounds (VOC) emissions per unit of product by 30%, compared to 2020 levels.

- **Strategic Initiatives:** The Company places particular focus on production processes with high VOC emission intensity, especially at operational sites with significant environmental impact. Across all production facilities, measures such as source substitution and optimization of treatment systems are implemented to reduce air emissions. The EHS Department works closely with production teams to ensure strict compliance with emission control standards, while actively identifying opportunities to reduce or eliminate hazardous chemicals. These efforts contribute to the optimization of industrial processes and the reduction of VOC emissions during production.

Water Resources

- **Targets:** By 2025, reduce water consumption per unit of product by 40% compared to 2020 levels.

- **Strategic Initiatives:** In the planning and design of new facilities, the Company gives full consideration to the efficient use of water resources by incorporating water-saving architectural designs and production processes to reduce water consumption at the source. A long-term goal of achieving zero wastewater discharge has been established and is being progressively pursued through technological upgrades and process improvements aimed at enhancing wastewater treatment efficiency and reuse rates, thereby minimizing effluent discharge. Regular maintenance and inspections are carried out on water-saving facilities to ensure their proper functioning and high efficiency. Damaged equipment is promptly repaired to prevent water waste. The Company also actively adopts advanced water-saving technologies and equipment—such as water recycling systems and rainwater harvesting systems—in both facility design and operations to reduce the consumption of freshwater resources.

Waste

- **Targets:** By 2025 achieve a 70% recycling rate for non-hazardous waste, and ensure 100% compliant disposal rate for hazardous waste.

- **Strategic Initiatives:** The Company reduces waste generation and enhances resource efficiency through source reduction and increased end-of-pipe recycling rates, thereby improving the residual value of waste. It is committed to ensuring transparency in waste management processes and strengthening the concept of circular economy by implementing continuous improvement initiatives and rigorous environmental protection measures to drive environmental sustainability. A comprehensive hazardous waste management system has been established, ensuring that hazardous waste is collected, labeled, stored, and legally disposed of by qualified third parties in strict accordance with national environmental regulations. Full traceability and zero leakage are maintained throughout the entire disposal process.

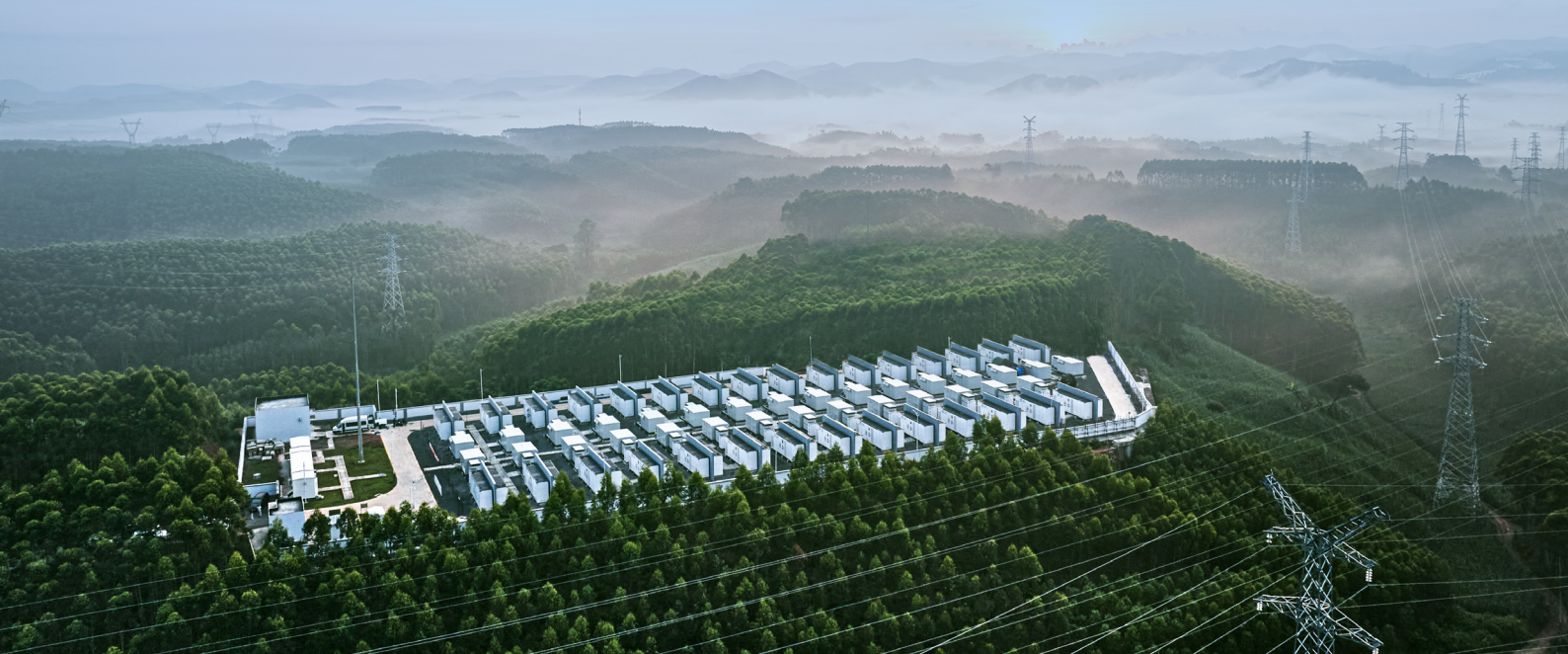
Industrial Noise

- **Targets:** Reduce noise impact generated during production and operations.
- **Strategic Initiatives:** To address potential high-noise activities such as equipment operation, logistics, and production processes, the Company adopts a range of noise mitigation measures, including the selection of low-noise equipment, optimization of process workflows, and installation of soundproofing and noise-reduction devices to reduce the intensity of noise sources. Regular noise monitoring is conducted to ensure continuous compliance with relevant regulatory standards, effectively preventing noise-related disturbances and occupational health risks.

Regular environmental education and training are provided to all employees, aiming to enhance awareness and operational competence across the organization, while training programs cover environmental laws and regulations, internal environmental management systems, and best practices in pollutant and waste management, disposal, and emission reduction. Employees are empowered to proactively identify and mitigate potential environmental risks in their daily work, thereby helping to prevent and reduce environment-related incidents.

Suppliers, subcontractors, and customers are encouraged to adopt international environmental standards and fulfil their environmental responsibilities.

Environmental performance is regularly identified, assessed, and managed through the establishment of specific, measurable targets aimed at reducing environmental impact. Progress is continuously monitored and evaluated to ensure the effectiveness of environmental management practices. The Company is committed to disclosing environmental data in accordance with international standards and supporting third-party verification.



Provide Green and Low-Carbon Products

Sungrow conducts product life cycle assessments (LCA) and is committed to progressively providing transparent and digitalized information on the environmental impacts of its products, such as Environmental Product Declarations (EPD) or other forms of eco-labels.

LCA is being integrated into the design of new products and solutions. Without compromising product performance, the Company is gradually incorporating low-pollution, energy-efficient, recycled, and renewable materials to replace portions of raw materials and packaging, aiming to reduce product-related carbon emissions and energy consumption at the end-of-life stage.

The Company is committed to progressively establishing product take-back programs, including for batteries and components designed for disassembly, remanufacturing, reuse, or recycling. It intends to disclose the proportion of products covered by such programs, as well as the associated revenues and/or cost savings, in order to foster a resource-efficient circular economy and business model.

Actively Respond to Climate Change

By referencing international standards such as IFRS S2, Sungrow has established a systematic process for managing climate-related risks and opportunities, encompassing identification, assessment, prioritization, and ongoing monitoring. This approach enhances organizational resilience to climate-related risks while uncovering potential value and opportunities within the business. Key components include:

- **Governance:** The Board of Directors has defined oversight responsibilities for climate-related risks and opportunities, while climate accountability has been embedded within the Company's Management's functions, supported by performance evaluation and incentive mechanisms.

- **Strategy:** The Company conducts structured climate scenario analyses to quantify the potential impact of climate-related risks and opportunities on business continuity, asset value, and financial performance. Climate-related risks and opportunities are explicitly integrated into the Company's strategic planning and major investment decision-making processes.

- **Impacts, Risks, and Opportunities Management:** An integrated climate-related risk and opportunity management framework has been developed, addressing both physical, transition risks, and opportunities. Tailored risk and opportunity mitigation measures and contingency plans are developed and implemented across the value chain, with regular reviews to assess the effectiveness of response strategies.

- **Metrics and Targets:** The Company continuously improves the accuracy of its carbon accounting and discloses Scope 1, Scope 2, and Scope 3 greenhouse gas emissions, along with progress toward reduction targets at various levels. Science-based resilience indicators are provided, and climate-related capital expenditures and investments are transparently reported.

The Company has set targets for carbon neutrality and net-zero emissions. These goals are pursued through measures such as process optimization, energy efficiency improvements, the adoption of clean energy, and engagement with the supply chain to drive emissions reduction. The specific targets are as follows:

- **By 2028:** Achieve operational carbon neutrality (Scope 1 + 2); reduce absolute emissions from Scope 1 + 2 by 70% from 2023 levels.

- **By 2038:** Achieve supply chain carbon neutrality (Scope 1 + 2 + 3).

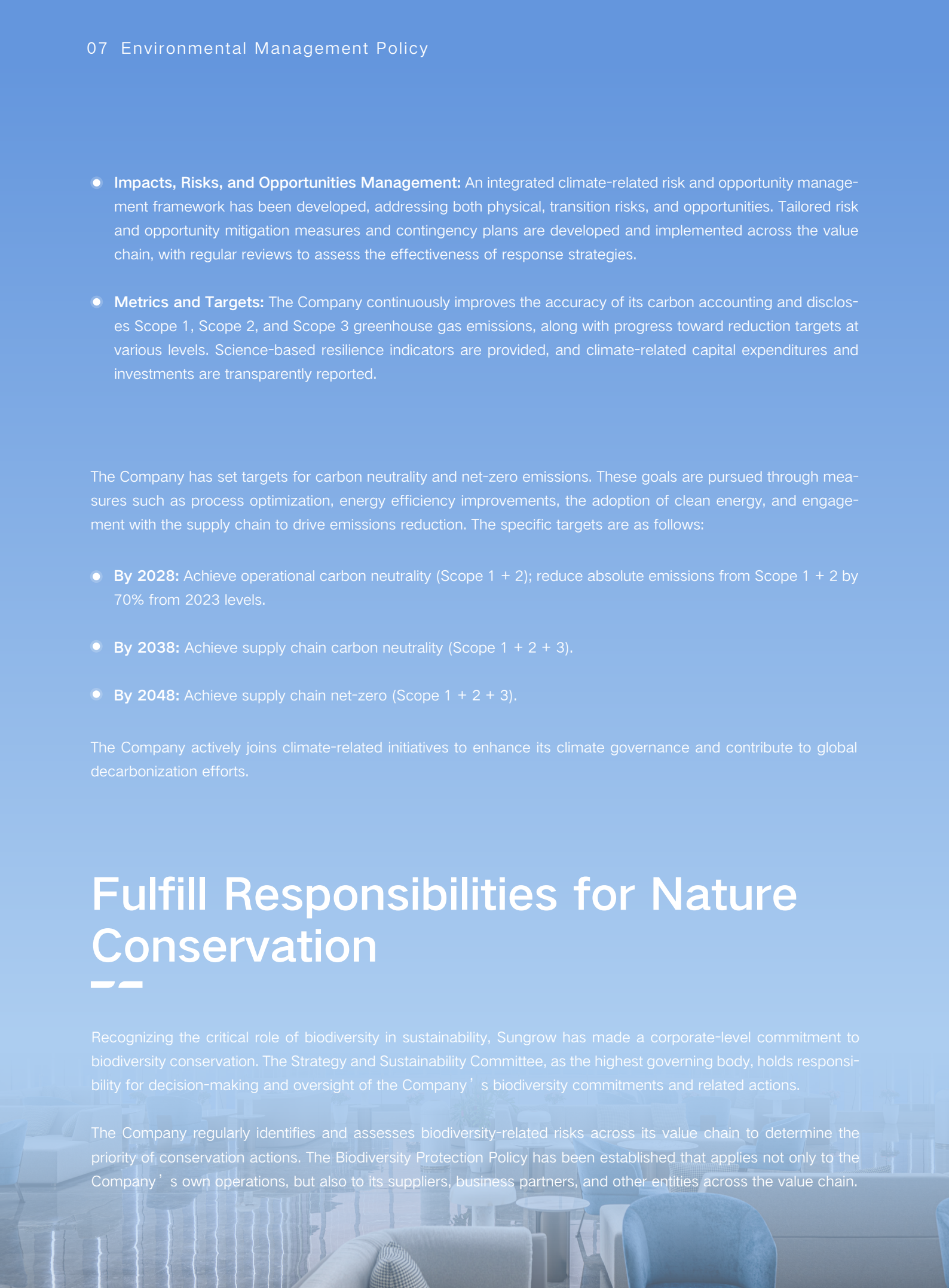
- **By 2048:** Achieve supply chain net-zero (Scope 1 + 2 + 3).

The Company actively joins climate-related initiatives to enhance its climate governance and contribute to global decarbonization efforts.

Fulfill Responsibilities for Nature Conservation

Recognizing the critical role of biodiversity in sustainability, Sungrow has made a corporate-level commitment to biodiversity conservation. The Strategy and Sustainability Committee, as the highest governing body, holds responsibility for decision-making and oversight of the Company's biodiversity commitments and related actions.

The Company regularly identifies and assesses biodiversity-related risks across its value chain to determine the priority of conservation actions. The Biodiversity Protection Policy has been established that applies not only to the Company's own operations, but also to its suppliers, business partners, and other entities across the value chain.



Review and Update

Sungrow is committed to conducting a comprehensive review of the Environmental Management Policy at least once a year. This review process covers this Policy's legality, appropriateness, effectiveness, and alignment with the Company's current operations and future strategic direction. In addition, special reviews will be promptly initiated in response to significant regulatory changes, the adoption of new technologies, or adjustments in business models, to ensure timely updates and continued applicability of this Policy.

Information Disclosure

This Policy shall be communicated comprehensively to all employees through the Company's internal information network. All employees are required to fully understand and strictly comply with the provisions. Regular training sessions will be conducted to enhance employees' understanding and implementation of this Policy, thereby ensuring its effective execution.

Upon review and approval by the Company's Strategy and Sustainability Committee, this Policy shall be implemented across all global production and operational sites.

Date of Issue: May 2025

Version: 2025V1

Sungrow Youtube Account

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Sungrow Official Website

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