

GLOBAL HUMAN RIGHTS POLICY



Sungrow Power Supply Co., Ltd. (hereinafter referred to as “Sungrow” or “the Company”) is committed to respecting and upholding the human rights of all employees, suppliers, customers, and other stakeholders—regardless of race, color, religion, gender, sexual orientation, age, disability, nationality, or any other personal characteristics. This Global Human Rights Policy (hereafter referred to as “this Policy”) reflects not only a solemn commitment but also the core values and code of conduct that guide the Company’s operations. Sungrow is dedicated to ensuring that all stakeholders can enjoy their fundamental rights and is committed to contributing to a just, inclusive, and sustainable society.

This Policy has been established to safeguard the fundamental rights and dignity of individuals throughout the Company’s operations, encompassing employees, suppliers, customers, and other stakeholders.

This Policy applies to Sungrow Power Supply Co., Ltd. and its subsidiaries, covering the Company’s production and business operations, products and services, etc. It applies to all employees (including part-time employees, contractors, and interns). The Company also requires its suppliers, service providers, contractors, and other major business partners to comply with this Policy or equivalent regulations and standards.



Fundamental Principles

Compliance with Laws, Regulations, and International Conventions

Sungrow complies with all applicable laws and regulations related to the protection of human rights, including but not limited to the *Labor Law of the People's Republic of China*, *Civil Code of the People's Republic of China*, and *Personal Information Protection Law of the People's Republic of China*, and other local laws and regulations in the jurisdiction where the Company operates.

The Company aligns with international human rights conventions, including the *International Bill of Human Rights*, comprising the *Universal Declaration of Human Rights*, the *International Covenant on Civil and Political Rights*, and the *International Covenant on Economic, Social and Cultural Rights*, as well as the *UN Guiding Principles on Business and Human Rights*, the *ILO Declaration on Fundamental Principles and Rights at Work*, and the SA8000® Standard.

The Company respects and adheres to the ten core conventions of the International Labour Organization (ILO), which include the *Equal Remuneration Convention*, *Minimum Age Convention*, *Worst Forms of Child Labour Convention*, *Discrimination (Employment and Occupation) Convention*, *Forced Labour Convention*, *Abolition of Forced Labour Convention*, *Occupational Safety and Health Convention*, *Freedom of Association and Protection of the Right to Organise Convention*, *Right to Organise and Collective Bargaining Convention*, and *Promotional Framework for Occupational Safety and Health Convention*.

Opposing Modern Slavery

The Company firmly opposes all forms of modern slavery, including debt bondage, human trafficking, and the use of child labor. The Company prohibits the direct or indirect employment of any form of forced or involuntary labor, such as slave labor, prison labor, indentured labor, or debt labor.

In alignment with the ILO Core Conventions and the United Nations *Guiding Principles on Business and Human Rights*, the Company is committed to ensuring that all labor is based on informed consent, voluntariness, and fairness. The Company does not tolerate any use of violence, coercion, restriction of personal freedom, confiscation of identity documents, or threats to obtain labor. It fully respects employees' freedom, including the right to freely choose employment, resign voluntarily, accept or decline overtime, and move without restriction.

The Company pledges not to use any form of punitive or coercive measures to force employees to work. It has established policies and procedures to protect underage workers, ensuring that all operations comply with national regulations, relevant international conventions, and the SA8000® Standard. The Company does not engage with suppliers or business partners that employ child labor or forced labor.

The Company is also committed to responsible mineral sourcing and complies with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*. Drawing upon industry's best practices established by the Responsible Minerals Initiative (RMI), the Company actively upholds human rights throughout the mineral procurement process.

The Company requires supply chain partners to disclose the origin and supply chain information of key minerals such as tantalum, tin, tungsten, gold, and cobalt, and gives priority to smelters and refiners certified by credible third parties. Human rights risks are integrated into due diligence assessments for mineral sourcing, including evaluation of potential adverse impacts on workers, local communities, minorities, and indigenous peoples. Where necessary, the Company conducts on-site audits, commissions independent assessments, or terminates cooperation to effectively safeguard the fundamental rights of all individuals involved in resource extraction.

Freedom of Association and Collective Bargaining

Actively fostering an open, transparent, and inclusive communication mechanism, the Company respects employees' freedom of association and their right to collective bargaining. The Company is committed to ensuring that no internal factors—such as discrimination, wage penalties, or dismissal—impede or restrict employees from exercising these rights.

The Company has instituted a regular dialogue mechanism between capital representatives (including management or their authorized delegates) and employee representatives. At minimum, one formal dialogue session is held annually, with additional meetings convened as needed. The Company supports employee representatives in performing their duties independently and ensures they are protected from any form of discrimination or retaliation.

Regular employee representative congresses and trade union representative meetings are organized to facilitate communication and decision-making. The Company also enters into collective agreements on a regular basis, ensuring that 100% of eligible employees are covered under such agreements. Based on the resolutions passed during these meetings and relevant developments, the Company formulates topics for the following year's collective bargaining, which may include matters such as employee remuneration and benefits.



Anti-Discrimination and Anti-Harassment

The Company firmly opposes all forms of discrimination and maintains a zero-tolerance policy toward any behavior, language, or written content that involves distinction, exclusion, restriction, or preference based on race, color, gender, age, language, religion, ethnicity, or other identity factors.

The Company strictly prohibits workplace harassment, including any form of sexual coercion, threats, humiliation, or exploitative behavior—whether expressed through gestures, language, or physical contact. The Company is committed to ensuring a safe and respectful work environment free from harassment.

Regular training on anti-discrimination and anti-harassment is provided to all employees. A clear appeal mechanism is in place for related incidents, and any individual found to have engaged in discriminatory or harassing behavior will face serious consequences. In cases where the conduct may constitute a criminal offense, the matter will be referred to judicial authorities in accordance with the law.

Freedom of Expression and Privacy Protection

The Company encourages employees to exercise their right to freedom of expression and opinion while fostering a culture of constructive dialogue and collaboration within the Company.

The Company is committed to protecting the fundamental rights to privacy and personal data of employees and third parties (including suppliers, customers, and business partners) by ensuring that personal information is handled in a lawful, secure, and transparent manner.

Working Hours and Leave

The Company establishes and maintains fair systems and procedures for managing working hours and rest periods. In accordance with relevant labor, health, and safety laws and regulations, the Company arranges work and rest schedules to meet or exceed local statutory requirements as well as applicable international conventions and the SA8000® Standard.

The standard workweek consists of five working days, Monday through Friday, with Saturday and Sunday designated as rest days. The total weekly working hours shall not exceed 40 hours. Any work performed beyond this limit shall be considered overtime. A work hours management system shall be established to strictly control the duration and frequency of overtime work. Employees shall not be required to work overtime compulsorily. Overtime compensation will be calculated in accordance with applicable national laws and regulations, as well as the Company's internal policies, including the "Regulations of Employee Overtime Management." Overtime pay will be included in the employee's salary for the corresponding month.

Compensation and Benefits

Taking into account market compensation trends and based on the philosophy of “remuneration based on position, capability, and performance,” the Company has established a performance-oriented, capability- and position-based value evaluation system, as well as a value distribution mechanism that centers on contributors who continuously create value. The Company has formulated internal policies such as the *Regulations on Compensation and Benefits Management* and the *Overseas Compensation Management Guidelines*. Adhering to the principle of equal pay for equal work, the Company ensures that male and female employees receive fair and equitable compensation for work of equal value. The Company is committed to offering equally competitive compensation levels and benefit packages to its global workforce, regardless of nationality, ethnicity, age, gender, or religion, and ensure that all employees are not subjected to differential treatment due to non-job-related factors. The minimum wage for employees in all regions where the Company operates is higher than the local statutory minimum wage.

The Company provides fair, diverse, and competitive non-salary benefits to employees across all regions worldwide (including part-time employees and contractors). In compliance with regional legal requirements, the Company offers paid leave such as maternity leave, paternity leave, and parental leave, as well as sick leave, supplementary medical insurance/retirement benefit plans, wellness programs, and other forms of benefits. The employee benefits system is continuously improved to provide better protection. For example, in the Hefei factory, female employees are granted maternity leave of no less than 158 days, male employees are granted 30 days of paternity leave, and employees are entitled to 10 days of paid parental leave per year until their child reaches the age of six.

Career Development and Training

The Company has established a scientific and reasonable career development path and promotion mechanism, encouraging employees to plan their careers based on their individual interests and capabilities. A wide range of training programs and practical opportunities are provided to enhance employees’ professional skills and overall competencies, enabling them to meet the demands of industry development and the Company’s strategic objectives.

Through effective career development and training, the Company aims to strengthen employees’ sense of belonging and loyalty, retain outstanding talent, and stimulate innovation and vitality among employees. In alignment with the Company's business characteristics and job requirements, diversified career development paths have been designed, covering multiple tracks such as technology, management, sales, and marketing.

The development paths, promotion criteria, and capability requirements for each career track are clearly defined to provide employees with clear guidance and expectations for their career progression. Detailed performance feedback is offered to help employees understand their strengths and areas for improvement, and to provide target recommendations for their professional development.

Health and Safety

The Company is committed to providing a safe and healthy working environment and, within reasonable and feasible limits, strives to minimize the inherent risks in the workplace. Appropriate measures are taken to prevent accidents and injuries during work processes, ensuring that all employees maintain high standards of health and safety in daily operations.

The Company rejects all forms of discrimination, harassment, violence, or abuse, including verbal, behavioral, or other inappropriate conduct.

For detailed policies and procedures related to health and safety, please refer to Sungrow's *Health and Safety Management Policy*.

Grievance and Whistleblowing Mechanism

The Company has established and maintains procedures for handling grievances and complaints, ensuring that employees' concerns and complaints are investigated and addressed, with the outcomes communicated to employee representatives.

Anonymous channels for complaints and whistleblowing have been set up to encourage employees, suppliers, and members of the public to report any violations of this Policy. The Company is committed to maintaining confidentiality of whistleblowers' identities and ensuring proper investigation and handling of reported matters.

Protection of Vulnerable Groups

Adhering to the principle of "people-oriented," the Company cares about the well-being of employees and their families, and provides assistance to employees in need through measures such as interest-free loans. The Company complies with and implements maternity leave, breastfeeding leave, parental leave, and other relevant systems in all regions of operation. Measures such as setting up nursing rooms, purchasing exclusive commercial insurance for all female employees, arranging specialized medical check-ups, and granting special benefit allowances for women are adopted to ensure that the rights and interests of female employees are fully protected.

Training and Awareness-Raising

The Company provides relevant training and education to ensure that employees understand the Company's Global Human Rights Policy. It fosters a culture that promotes respect and inclusion, and firmly opposes any form of discrimination and violence.

Social Responsibility

The Company actively engages in social responsibility initiatives, supports the promotion of human rights and social justice, and strives to contribute to social development and progress.

Due Diligence

The Company conducts human rights due diligence through a combination of internal audits and third-party audits. A due diligence procedure that covers the entire business operation process has been established to ensure that all human rights issues are addressed across all employees, business partners (such as suppliers and contractors), and local communities.

Systematic reviews of potential human rights issues are conducted regularly to identify actual and potential human rights risks. These include risks related to forced labor, human trafficking, child labor and young workers, discrimination, restrictions on freedom of association and collective bargaining, equal pay for equal work, health and safety management, and working hours. Particular attention is given to the rights of vulnerable groups such as women, children, indigenous peoples, migrant workers, and third-party employees.

Due diligence results are compiled by the ESG Development Center and reported to the Sustainability Management Office and the Strategy and Sustainability Committee. For mergers, joint ventures, or major investment decisions, human rights risk assessments are conducted prior to establishing business relationships to ensure alignment with human rights standards.



Mitigation and Remedy

For identified human rights risks, mitigation measures are formulated in proportion to the severity of the impact, in order to minimize risks and control them within an acceptable level. Specific measures include the formulation and implementation of a human rights policy, regular human rights training for employees and supply chain partners, enhanced supply chain oversight, and requiring suppliers to sign codes of conduct that include human rights requirements.

In terms of supplier human rights risk assessments, a combination of real-time risk monitoring through an online platform and on-site supplier audits is employed to identify high-risk suppliers. For non-conformities related to human rights, suppliers are required to develop Corrective Action Plans (CAPs), and the Company continuously tracks their improvement progress.

Responsible teams and management monitor and review the implementation of mitigation measures to ensure each human rights issue is effectively addressed. For business activities identified as causing or exacerbating human rights impacts, the Company will immediately cease the infringing conduct and take measures to implement remedial actions, both economic and non-economic. These may include financial compensation, legal aid, psychological support, and career development opportunities to reduce the adverse impacts on affected individuals, while holding relevant parties accountable. At the same time, special mitigation programs are implemented in high-risk areas, including the improvement of working environments, strengthening of supervision mechanisms, and promotion of stakeholder collaboration. The Company continuously enhances its human rights due diligence process and promotes fair and sustainable development.

Review and Update

Sungrow is committed to conducting a comprehensive review of the Global Human Rights 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. In the event of any overlapping provisions between this Policy and other documents, the requirements set forth in this Policy shall prevail. The Human Resources Center is responsible for the interpretation of this Policy in cases where there are differences in understanding or implementation.

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