

ANTI-CORRUPTION MANAGEMENT POLICY



Sungrow Power Supply Co., Ltd. (hereinafter referred to as “Sungrow” or “the Company”) has always maintained a zero-tolerance stance toward corruption and takes all necessary measures to prevent and combat corrupt practices. The Company firmly believes that commercial corruption undermines fair market competition and poses significant harm to society, the economy, and corporate development. Sungrow recognizes that long-term success depends not only on the quality of its products and services, but also on the ethical conduct and integrity of its employees.

To this end, this Anti-Corruption Management Policy (hereafter referred to as “this Policy”) is established to explicitly prohibit all forms of commercial corruption, including but not limited to bribery, embezzlement, misappropriation of funds, collusion in bidding, and infringement of trade secrets. It aims to promote the healthy and sustainable development of the Company.

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 suppliers, service providers, contractors and other major business partners to comply with this Policy or equivalent regulations and standards.



Enhance Internal Control Systems



Sungrow strictly complies with the *Criminal Law of the People's Republic of China*, *Company Law of the People's Republic of China*, and other local laws and regulations in the jurisdictions where the Company operates. At the same time, the Company actively benchmarks against international anti-corruption standards and is committed to adhering to global frameworks such as the United Nations *Convention against Corruption* and the *OECD Anti-Bribery Convention*. Through these efforts, the Company continuously strengthens its anti-corruption management system and aligns with international business practices.

The Board's Audit Committee serves as the highest governing body for anti-corruption efforts and assumes overall responsibility for integrity management across all business areas. Its duties include supervising and implementing the Company's internal audit system and formulating guidelines for integrity practices. The Audit and Inspection Department, operating at the first-tier level, independently conducts audits and inspections, establishes comprehensive policies and procedures centered on anti-corruption, investigates employee misconduct that violates internal integrity standards, and reports key findings to the Audit Committee on a quarterly basis. The Legal and Compliance Department is responsible for anti-bribery matters and regularly reports to the supervising Vice President.

All Sungrow employees are strictly prohibited from offering or accepting bribes—directly or indirectly—to or from public officials or business partners in exchange for commercial advantage. Likewise, they must not use their authority or position to solicit or accept improper benefits or misappropriate company assets. Business partners, including customers, suppliers, distributors, service providers, intermediaries, and other commercial collaborators, are also prohibited from offering bribes or improper benefits to Sungrow employees in any form.

Develop Risk Assessment and Regular Audit Mechanisms



Sungrow is committed to establishing a systematic corruption risk assessment mechanism that encompasses all aspects of business operations, including but not limited to:

- Conducting targeted risk assessments at least annually for high-risk business areas, regions, and partners. In accordance with the Regulations of Internal Audit and Inspection Management, regular anti-corruption audits shall be carried out across functional centers, business units, and subsidiaries.

- Starting from 2024, the Audit and Inspection Department shall conduct anti-corruption audits at major operational sites every three years to monitor compliance with Company policies, including the Anti-Corruption Management Policy. Risk control strategies should be adjusted based on assessment results to continuously enhance the anti-corruption management system.

Enforce Anti-Corruption Measures

Promote a Culture of Integrity

Great emphasis is placed on fostering a culture of integrity. Anti-corruption awareness is advanced through training and communication initiatives targeted at both employees and business partners, with the aim of embedding ethical conduct as a core corporate value. The integrity education and training mechanisms include but are not limited to:

- Requiring employees to sign the *Integrity, Compliance, and Self-Discipline Commitment Letter* (see Appendix 1), and providing annual anti-corruption training and education for all employees (including part-time employees and contractors), examinations are conducted to reinforce awareness of ethical conduct. The training covers topics such as the procedures for using reporting channels, aiming to promote transparency and accountability within the Company. All new hires receive onboarding training that covers internal policies such as the *Employee Handbook*, *Code of Conduct for Compliance*, *Regulations of Employee Integrity and Self-Discipline Management*, *Regulations of Whistleblowing and Appealing Management*, and *Regulations on the Management of Conflict of Interest Between Employees and the Company*.
- Operating the Integrity Sungrow WeChat public account and the ISG Compliance Service platform to regularly disseminate holiday reminders and case studies on ethical breaches. Each article concludes with information on available reporting channels.



- Integrating integrity performance into the overall employee evaluation and assessment system. Employees who violate the Regulations of Employee Integrity and Self-Discipline Management shall face disciplinary actions commensurate with their violations, including but not limited to: performance rating reduction, demotion, or termination of employment contract.
- Sending integrity letters to business partners on a regular basis to reinforce expectations and promote self-discipline.

In the event of employee misconduct related to corruption, disciplinary action will be taken in accordance with the *Regulations of Employee Integrity and Self-Discipline Management*. Based on the nature, severity, and consequences of the violation, the Company will impose organizational or disciplinary penalties, and where applicable, refer the matter to judicial authorities for legal action.

Anti-Corruption Management for Suppliers

All suppliers are required to sign the *Integrity Agreement* (see Appendix 2) during the admission stage. Compliance with this agreement is monitored through regular spot checks and the distribution of integrity letters. The *Regulations of Supplier Blacklist Management* has been formulated to strengthen disciplinary measures against breaches of contract and trust, prevent commercial bribery and fraudulent practices, and ensure ethical conduct across all personnel levels. Suppliers found to be involved in corruption or bribery are categorized based on the severity of the violation and subjected to differentiated disciplinary measures. In addition, the *Supplier Guidelines* are communicated annually to promote awareness of Sungrow's anti-corruption policies among suppliers.

External Donations

Participation in donation activities is carried out in compliance with applicable laws and regulations. All charitable contributions must undergo an approval process to ensure their legality and transparency. Any form of bribery—whether direct or indirect—through political contributions, charitable contributions or sponsorships is strictly prohibited.

Establish Reporting and Oversight Mechanisms

Whistleblowing Mechanisms and Procedures

The *Regulations of Whistleblowing and Appealing Management* establishes accessible, efficient, and transparent channels for whistleblowing and appealing concerns related to business ethics violations. Whistleblowing and appeals may be submitted anonymously or under real name 24/7 via the hotline (0551-65327830), TEL (18655168110, also available on WeChat), or email (complain@sungrowpower.com). The Audit and Inspection Department is responsible for handling all whistleblowing and appeals concerning misconduct that violates business ethics or harms the interests of the company, employees, or partners, in accordance with the *Regulations of Internal Audit and Inspection Management*. Designated departments are assigned to conduct investigations and take appropriate action. If the whistleblower disagrees with the outcome, they have the right to appeal to the supervisor overseeing the investigation to ensure fairness and impartiality.

Whistleblower Protection

Whistleblowers who provide valid leads or evidence that result in verified findings may receive a reward based on a proportion of the verified amount. Strict confidentiality is maintained to protect the identity of whistleblowers, informants, and their close relatives. Their personal safety and legal rights are safeguarded, and any form of discrimination or retaliation is strictly prohibited. Violators will be subject to disciplinary action in accordance with the *Regulations of Employee Reward and Punishment Management* and, where applicable, referred to judicial authorities for legal prosecution.

Sungrow encourages both employees and business partners to work together in safeguarding the Company's reputation and promoting its sound and sustainable development. We also look forward to everyone actively participating in anti-corruption and anti-bribery efforts, joining hands to cultivate a culture of integrity and build a transparent, ethical, and upright Sungrow ecosystem.



Review and Update



Sungrow is committed to conducting a comprehensive review of the Anti-Corruption 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 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.

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Appendix 1

Sungrow Power Supply Co., Ltd. Integrity, Compliance, and Self-Discipline Commitment Letter

To effectively implement the *Code of Conduct for Compliance, the Regulations of Employee Integrity and Self-Discipline Management*, and other relevant policies; to uphold the Company's core values; to fulfill professional responsibilities with integrity; to strengthen ethical awareness; and to reinforce personal self-discipline, I hereby make the following solemn commitment to the Company (referring to Sungrow Power Supply Co., Ltd., including its invested and controlled subsidiaries and branches):

I. I have completed the study of the *Employee Handbook, Code of Conduct for Compliance, Regulations of Employee Integrity and Self-Discipline Management*, and other relevant internal policies issued by the Company. I fully understand Sungrow's unwavering commitment to integrity and compliance, and recognize that any breach in this regard constitutes an inviolable red line. I am aware that the Company will communicate the latest compliance policies through its official website, OA intranet, DingTalk platform, email, and other channels. I pledge to make the efforts in studying, understanding, and abiding by the law, to strictly observe all applicable laws, regulations, supervisory requirements, and internal rules, and to diligently supervise both myself and my subordinates in the faithful execution of duties.

II. I acknowledge the vital importance of compliance operation in supporting the Company's sustainability. I commit to conducting myself with the highest standards of professional ethics—upholding integrity, honesty, dedication, and accountability, while safeguarding the reputation of the Company. I will strictly adhere to the principles of compliance management and integrate compliance awareness into all aspects of business operations. In circumstances of uncertainty, I will proactively seek guidance or clarification to ensure full compliance in all matters, at all times.

III. I will comply with all relevant laws, regulations, and internal Company policies, uphold professional ethics, and consistently embody the core values of the Company in both conduct and practice.



I hereby pledge that in all interactions involving myself and my immediate family members with business partners (including but not limited to suppliers, distributors, customers, financial institutions, intermediaries, and other partners) and their employees, we will adhere strictly to the following requirements:

- We shall not solicit or accept, under any circumstances or in any form, cash, bank transfers, marketable securities, loans or disguised loans, gift cards, or valuables. We shall not engage in any monetary transactions of any nature with business partners. In the event that a gift or item cannot be declined, we will report it truthfully to the Audit and Inspection Department within 24 hours and promptly surrender it to the Company.
- We shall not request or accept reimbursement of any personal expenses by business partners. We shall not accept invitations from business partners to meals, entertainment, gambling, travel, or any other activities that may unduly influence business decisions.
- Unless the transaction is at fair market value and there is no business relationship involved, we shall not engage in any form of commercial dealings with business partners or their employees, including but not limited to home renovations, purchases of furniture, IT products, or personal services.
- We shall not take employment or part-time positions with any business partners. If an immediate family member is already employed by a supplier prior to the commencement of business dealings, we will disclose this to the Company and request recusal from any related business activities. Except in the case of publicly traded securities of listed companies, we shall not hold shares in any business partner or its affiliates.
- We shall not engage in bribery of business partners or public officials, nor shall we conduct business through any other illegal means.
- We shall not be involved in any other form of transfer of material interests between ourselves and business partners or their employees.

I further commit not to engage in the following prohibited behaviors:

- Submitting false reimbursement or payment requests, or providing the Company with fabricated invoices and receipts.
- Stealing Company's or colleagues' property; submitting false information or documentation during the hiring process or employment period with the intent to deceive the Company.
- Forging the signatures of superiors or other Company personnel, misappropriating the Company's official seals; conducting business under the Company's name without authorization; or signing contracts, delivery notes, receipts, or payment confirmations in the Company's name where no genuine business exists.
- Falsifying or manipulating financial, operational, or business data, including artificially inflating revenue, profits, or other performance indicators.

- Engaging in private transactions using the Company's clients or other business resources, or introducing clients to competing entities.
- Without the Company's consent, investing in or operating businesses that deal in the same or similar products as the Company, or holding positions such as director, supervisor, general manager, or other substantive managerial roles in other companies.
- Any other intentional acts that cause significant harm to the interests of the Company.

IV. I am fully aware of the Company's policies and regulations on integrity and compliance, and I hereby pledge to enhance my awareness accordingly. In the event of any unforeseen circumstances, I will promptly report to my superior and fully cooperate with both internal and external audits or investigations. Should I become aware of any existing or potential compliance risks or violations, I will report them without delay to my immediate supervisor, the Legal and Compliance Department, or file a report with the Audit and Inspection Department.

The above commitments are made voluntarily and in full recognition of the Company's core values and regulatory framework. I willingly accept the Company's oversight and, in the event of any breach of the above commitments, agree to accept all disciplinary actions imposed by the Company. These may include, but are not limited to termination of employment, surrender of any illegal or non-compliant gains, compensation for losses incurred by the Company, cancellation of stock or option grants, and inclusion on the Sungrow Integrity Alliance's blacklist.

Pledger:

ID Number:

Position:

Date:



Appendix 2

Sungrow Power Supply Co., Ltd. Integrity Agreement

To ensure a healthy and sustainable cooperative relationship between both parties throughout procurement, project construction, business services, and other commercial activities, and to uphold integrity, fairness, honesty, transparency, and compliance, both Party A and Party B hereby agree to the terms of this Agreement, which shall serve as the premise and foundation for all forms of cooperation between them. This Agreement applies equally to Party A and Party B, including their respective affiliated companies.

I. Both parties shall comply with the *Anti-Unfair Competition Law of the People's Republic of China*, *Criminal Law of the People's Republic of China*, *Civil Code of the People's Republic of China*, as well as other applicable laws, regulations, and business ethics. Each party shall protect the lawful rights and interests of the other and ensure that their respective employees abide strictly by the same.

II. Party A requires that its employees shall not accept any gifts, hospitality, red envelopes, bribes, or loans from Party B under any circumstances. Upholding the principles of integrity, honesty, respect, and fairness, Party A's employees shall not seek reimbursement from Party B for any expenses that should be borne by Party A or its staff. They must not request or accept assistance from Party B in any private matters involving themselves or close relatives, including education, employment, housing, renovation, weddings or funerals, and other personal affairs. Furthermore, they shall not hold any position (including but not limited to shareholder, director, or advisor) in Party B or its affiliates. Party A requires its personnel to strictly follow the company's procurement policies, supplier management procedures, inspection protocols, and financial regulations. Party B fully understands and commits to active cooperation in this regard.

III. Party A's personnel shall prioritize the best interests of Party A in every negotiation, technical discussion, procurement activity, and project tender. Any conduct that undermines or compromises Party A's interests during such transactions is strictly prohibited. Party B acknowledges and accepts this provision, and shall promptly and truthfully notify Party A upon discovering any such conduct by Party A's personnel.

IV. Party B commits to providing Party A with the highest quality products or services at the most competitive prices. Quotations submitted by Party B shall solely reflect the intrinsic value of the product or service, without including any other improper elements. Party B and its employees shall refrain from any illegal or criminal conduct involving Party A, and must not offer gifts, money, securities, or any items of value to Party A's employees or stakeholders. They shall not provide loans, reimbursements, hospitality, gambling, entertainment, or non-business-related trips under any pretense; shall not engage in business or financial dealings with Party A's employees or their close relatives; and shall not provide facilitation in matters such as job placement, education, travel, or emigration. Party B and its affiliates must not hold shares in, or appoint Party A's personnel as shareholders, directors, supervisors, consultants, or to any other position. No hints, inducements, promises, or actions involving the transfer of actual benefits to individuals shall be permitted.

V.Should Party B discover that any Party A employee or stakeholder has solicited, implied, or accepted any benefit from Party B (or other suppliers), Party B is obligated to report the matter to Party A ' s responsible integrity department (Audit and Inspection Department) via the various channels (TEL: 0551-65327830/18655168110; Email: complain@sungrowpower.com). Failure to report such incidents truthfully in accordance with this Agreement shall subject Party B to the penalties outlined in Article VI, Clause 2.

VI.Rewards and Penalties

- In cases where Party A ' s personnel or their stakeholders are found to have actively solicited bribes, and Party B reports such behavior to the relevant department of Party A, once verified, Party A may grant Party B priority in procurement under equal conditions, prioritize payment for goods, and issue a reward equivalent to the value of the bribe. Party A undertakes to strictly protect the confidentiality of Party B ' s whistleblowing actions.
- If Party A verifies that Party B or its personnel have actively engaged in any conduct described in Article IV of this Agreement, or have passively done so and concealed it from Party A, regardless of the amount involved, Party A reserves the right to freeze any outstanding payables to Party B, revoke Party B ' s supplier qualification, and require Party B to pay liquidated damages according to the higher standard specified in applicable contractual terms.
- If Party B ' s bribery conduct meets the threshold for criminal prosecution, Party A reserves the right to report the matter to judicial authorities.
- If Party B reports violations committed by other suppliers of Party A, and such reports are verified, Party A shall grant Party B the same reward benefits as outlined in the first clause of this Article.



VII. Legal Validity: This Agreement shall become effective upon being signed and sealed by both parties. It shall remain valid indefinitely unless and until a newer version of this Agreement is executed by the parties. If any previous integrity agreement has been signed by the parties, this Agreement shall prevail. This Agreement constitutes an integral part of all business contracts entered into between the parties and shall have the same legal effect as those contracts.

VIII. Dispute Resolution: This Agreement is executed in the High-tech Industrial Development Zone, Hefei, Anhui Province, and shall be governed by and interpreted in accordance with the laws of the People's Republic of China. Any dispute or controversy arising out of or in connection with this Agreement shall be resolved through amicable consultation. If consultation fails, either party may bring a lawsuit before the People's Court with jurisdiction over the location of Party A's domicile. Unless otherwise determined by the outcome of the litigation, the losing party shall bear all costs related to dispute resolution, including but not limited to attorneys' fees, investigation costs, notarization fees, and litigation expenses.

IX. Counterparts: This Agreement is executed in two original copies, with each party holding one. Faxed or photo-copied versions of this Agreement shall be deemed equivalent to the original and shall carry the same legal effect.

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Sungrow Youtube Account



Sungrow LinkedIn Account



Sungrow Facebook Account



Sungrow X Account



Sungrow Official Website



Sungrow Official WeChat