

Sungrow Europe Code of Conduct

Table of Contents

1	Overview	1
1.1	Introduction.....	1
1.2	Scope and Effectiveness.....	2
1.3	Policy Statement	3
2	Continuous Enhancement of Corporate Governance	3
2.1	Corporate Governance.....	4
2.2	Product Quality and Safety	5
2.3	Environmental Protection	7
2.4	Finance and Tax Payment According to Law.....	9
2.5	Asset Management and Utilization	10
2.6	Intellectual Property Rights and Trade Secret Protection.....	12
2.7	Information Security Compliance	13
3	Protect Employees' Rights and Interests in accordance with Law.....	16
3.1	Respect, Equality, Diversity and Inclusion	16
3.2	Occupational Safety and Health	18
3.3	Conflict of Interest	20
4	Conducting Business Activities in Good Faith.....	21
4.1	Stakeholders Management	22
4.2	Anti-Corruption	24
4.3	Anti-Bribery.....	25
4.4	Fair Competition and Antitrust.....	26
4.5	Anti-Money Laundering	28
4.6	Trade Control and Economic Sanctions	29
5	Active Fulfillment of Social Responsibilities	30
5.1	Community Integration and Communication.....	30

- 5.2 Social Responsibility 31
- 5.3 External Donation..... 32
- 6 Compliance Management Support..... 33
- 6.1 Compliance Consultation and Reporting 33

Sungrow Europe Code of Conduct

1 Overview

1.1 Introduction

Sungrow (hereinafter referred to as “the Group” or “the Company”) is committed to providing clean power for all. With the vision of becoming a “global leader in clean electricity conversion technology”, Sungrow consistently upholds to ESG philosophy of “Green Mission for a Better Life.” We adheres to the corporate culture with core values of “Honesty & Reliability, Excellence & Adaptability, Innovation & Respect, Customer-first Approach.” We are diligently working towards establishing Sungrow as a global enterprise of robust capabilities, extensive presence , and unwavering trustworthiness.

Compliance is crucial for Sungrow's sustainable development, as well as for every member of Sungrow. The brand and reputation of Sungrow rest in the hands of each individual, who are relied upon to safeguard it. Adhering to compliance is the fundamental requirement in practicing our core values and forms the baseline of the Group’s risk management strategy. To ensure our business activities are legal and standardized , thereby safeguarding our high-quality and sustainable growth, we have established the “Code of Conduct” (hereinafter referred to as the “Code”) in accordance with relevant laws, regulations, and international conventions. This Code serves as a guide for conduct for Sungrow and all associated personnel, including Sungrow employees and third-party contractors who provide services under the Sungrow name or offer services to Sungrow). Specifically, Sungrow and its employees, are obliged to strictly abide by the Code. Companies in which Sungrow has an equity stake may use the Code as a reference for implementation. Moreover, every member of Sungrow is obliged to comply with the applicable laws, regulations, industry standards, internal policies, and ethical guidelines of the country or region where they operate, and to engage in their responsibilities with a heightened sense of due diligence and integrity.

All members of Sungrow recognize, practice, and safeguard the core values of “Honesty & Reliability, Excellence & Adaptability, Innovation & Respect, Customer-first Approach.”, and should:

- (1) Acknowledge and comply with the laws and regulations as well as the relevant company systems and

processes applicable to their work;

(2) Seek advice or guidance in a timely manner when unsure of what action to take;

(3) Promptly report discovered compliance issues or potential violations covered by the Code to the immediate supervisor, or through the company's whistleblowing channel.;

(4) Actively cooperate with the Company's internal investigation if necessary.

In addition to the above obligations, the Company's managers at all levels shall fulfill the following responsibilities:

(1) Uphold high moral standards, maintain disciplinary integrity, lead by example, and serve as role models for the Company;

(2) Communicate the importance of integrity and compliance to their subordinates; clarify and implement the relevant requirements of the Code;

(3) Take measures to prevent behavior that violates laws, regulations, and the Code;

(4) Protect whistleblowers from threats, intimidation, or retaliation for reporting misconduct, and provide necessary incentives to whistleblowers.

1.2 Scope and Effectiveness

The Code outlines the key policies and behavioral standards for the Company's global operations. Given that applicable laws, regulations, government policies, international treaties, and business cultures may vary by country or by region, any conflict between the provisions of the Code and the applicable laws and regulations of the country or region where the business operates should be promptly reported to the Legal & Compliance Department. This ensures necessary adjustments are made, balancing both the legal and regulatory requirements and the principle-based requirements of the Code. In case where only a standard-setting differs, the more stringent standards shall prevail. In the absence of specific requirement in the applicable laws and regulations, the provisions of the Code should be followed.

The Code applies to all directors, supervisors, senior management personnel, and employees of Sungrow and its subsidiaries. It also applies to individuals representing Sungrow and its subsidiaries or branches in various capacities, as well as to third-party personnel providing services to Sungrow. All these parties are expected to

comply with the relevant provisions of the Code.

1.3 Policy Statement

The development of the Code is primarily based on a principled framework. Within its scope, independently operated subsidiaries should formulate operational guidelines for themselves in line with the principles of conciseness, clarity and feasibility, considering their specific circumstances, and the relevant operating rules shall be established based on the applicable laws and regulations, government policies, and industrial standards.

Every employee should consider the following points with a sense of ownership when making business decisions:

(1) Is the behavior in line with the core values of Sungrow?

(2) Does the behavior comply with laws, regulations, government policies, and Sungrow's internal systems and processes ?

(3) Will the behavior affect high-quality and sustainable development of Sungrow?

(4) Could the behavior have any negative impact on Sungrow's brand image or reputation?

If you have doubts about any of the aforementioned issues, your decision may carry compliance risks. Please consult with your supervisor or HR Department before finalizing your decision.

The EU Compliance Team is responsible for the interpretation and implementation of the Code. All functional departments and subsidiaries are obliged to manage compliance, ensuring that the compliance activities within their responsibilities and business scope are carried out effectively. Considering that the Code comprises various interrelated or mutually supportive systems, the EU Compliance Team may coordinate with all relevant departments for a joint interpretation of the Code.

The EU Compliance Team may, based on actual operational needs, organize the evaluation of the Code and make necessary revisions. Once reviewed and approved, these revisions will be published on the website .

2 Continuous Enhancement of Corporate Governance

2.1 Corporate Governance

2.1.1 Commitment and Goals

By embracing lean and outstanding operational practices, we aim to enhance corporate health, efficiency, and sustainability, thereby empowering the Company to sustainably fulfill its environmental and social responsibility. We commit to a comprehensive risk management and fostering a compliance culture at all staff levels, while adhering to principles of transparent and compliant management to reduce enterprise risks. Sungrow strictly adheres to the requirements of publicly listed companies, vowing to establish and continuously improving a clear, smoothly functioning and effective cooperation internal governance system. Our internal decision-making processes align with legal statutes, ensuring that all internal entities conduct their business management activities within their authorized boundaries and in compliance with the law.

2.1.2 Basic Policies

2.1.2.1 Establish and implement internal decision-making mechanisms

Sungrow is committed to governance in accordance with the law, establishing the shareholders' general meeting, the board of directors, the specialized committees under the board, and the board of supervisors as mandated by law. This governance structure ensures a balanced decision-making power, execution power, and supervisory power through a mutual surveillance approach. Additionally, Sungrow aims to establish a systematically comprehensive, scientifically standardized and effectively operated institutional system as a safeguard.

2.1.2.2 Enhancing supervision mechanism

Sungrow emphasizes the importance of the supervision mechanism for its directors and senior management, particularly in significant and related-party transactions. By overseeing the compliance of these key personnel in executing their responsibilities, Sungrow ensures that their decisions and conduct are not only compliant with regulations but also align with the the overall interests of the company.

2.1.2.3 Standardize information disclosure

Sungrow fulfills its information disclosure obligations and maintains active communication with relevant authorities to effectively promote corporate governance and protect investors' right to information.

2.1.2.4 Control insider information

The company standardizes the internal reporting, transmission and confidentiality procedures of significant

information, controls the range of individuals with access to insider information, and ensures the security of such information. Sungrow diligently maintains records and documentation related to insider information, actively cooperates with the registration processes, and strictly prohibits any form of insider trading.

2.1.2.5 Strengthen internal control

Sungrow consistently maintains a comprehensive internal control system, clearly delineating the responsibilities of each department. We are committed to building and continually optimizing systematic, standardized and efficient business processes. The company also strengthens the coverage of internal audits, conducting reviews, supervision, and evaluation of the authenticity, legality and effectiveness of operations and management, as well as the financial income and expenditure, and other activities. This includes ensuring the standardization of internal controls in accordance with the audit plan which will allow us to identify and resolve issues, thereby supporting stable and efficient operations.

2.1.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

2.1.3.1 Follow the Group's governance structure, abide by all rules, regulations, and policies, implement the Company's decisions and instructions, and uphold the Company's standard operating procedures.

2.1.3.2 Without the authorization of the Company, it is prohibited to disclose non-public Company information to the public, either in the name of the Company or any individual.

2.1.3.3 Employees are prohibited from disclosing insider information to any external parties, including family members. They must not use insider information to engage, either directly or indirectly, in securities trading of Sungrow or other listed companies, nor should they use such information to advise others on buying or selling relevant securities.

2.1.3.4 Employees should actively participate in and contribute to the improvement of the internal control system, strictly adhere to professional ethics, and proactively prevent various risks to the Company.

2.2 Product Quality and Safety

2.2.1 Commitment and Goals

We are dedicated to pursuing excellence in quality, devoting ourselves to improving product quality and

safety. By adhering to all applicable laws, regulations, and standards, we strive to provide society and customers with safe and reliable products and services.

2.2.2 Fundamental Policies

2.2.2.1 Build quality management system

Sungrow is committed to establishing and continually optimizing a top-tier quality management system. We implement stringent international and industry standards for our products and carry out comprehensive testing and verification. Our quality management system undergoes regular evaluations and improvement to ensure it consistently meets the latest industry standards and the demands of customers, thereby mitigating quality risks.

2.2.2.2 Rigorously select supply chain

Sungrow consistently enhances its systematic supply chain ecosystem, implementing stringent supplier and component screening to ensure the highest quality standards. We establish long-term, trust-based partnerships with our suppliers, emphasizing the importance of their business ethics and compliance. This collaborative approach enables us to create value for our customers, maintaining our commitment to ethical and compliant business practices.

2.2.2.3 Strengthen research and development compliance

Sungrow follows a comprehensive research and development process management system, ensuring that each product meets the design specifications, relevant regulations, standards, and customer requirements throughout the design, experiment, verification, and use stages.

2.2.2.4 Adhere to standardized manufacturing

Sungrow continuously invests in advanced manufacturing technologies and tools, and employs sophisticated quality control methods and automation technologies, ensuring that every aspect in the product production process strictly adheres to the quality standards.

2.2.2.5 Collect feedback through multiple channels

We highly value feedback from customers and society. By gathering opinions and suggestions through various channels, we address the needs and concerns of the customers, continuously improving products and services to meet their expectations.

2.2.3 Core Requirements

2.2.3.1 proactively implement the requirements of the quality management system. Conduct rigorous monitoring and verification of all quality data to guarantee its authenticity and validity.

2.2.3.2 Strictly follow the established supply chain management system guidelines. Maintain high standards without compromise, firmly prohibiting any lowering of standards and concessions.

2.2.3.3 Adhere to relevant industry standards and test procedures, and conduct repeated verification to ensure safety and quality.

2.2.3.4 Uphold the principles of sincerity and pragmatism, rigor and openness in all manufacturing processes. Strictly implement the standardized manufacturing requirements, demonstrating zero tolerance for any form of fraudulent behavior.

2.2.3.5 Continuously strive for excellence, actively responding to the reasonable expectations of society and customers, and consistently pursue ongoing improvement.

2.2.3.6 Exercise due diligence and implement policies and procedures designed to avoid the use of conflict minerals.

2.3 Environmental Protection

2.3.1 Commitment and Goals

We are firmly committed to green operations, consistently comply with the environmental laws and regulations applicable to the places we operate. We focus on increasing the utilization of renewable energy, systematically advancing energy conservation and emission reduction, and achieving our corporate carbon neutrality goal through green production and operations. We aim to build a sustainable and low-carbon supply chain, collaborating with our partners to expedite the achievement of net-zero emissions across the entire value chain. Through product and service innovation, we aim to promote resource recycling, maintain biodiversity, contribute to ecological environmental protection, and advocate for the harmonious coexistence between the enterprise and nature.

2.3.2 Basic Policies

2.3.2.1 Implement the environmental protection requirements before project completion

Sungrow strictly follows the environmental protection requirements during project planning and

construction, We are committed to the organic integration of new energy project development and ecological environmental protection, upholding environmental friendliness. We ensure the thorough implementation of environmental protection measures in all phases of the projects, including design, production, construction, and operation.

2.3.2.2 Protect environment in operation

Sungrow emphasizes green and low-carbon operations, enhancing the utilization of renewable energy and improving energy efficiency. The company constantly engages employees in environmental protection and public welfare activities, promotes a green lifestyle, and educates them on controlling hazardous substances and greenhouse gas emissions, as well as reducing noise and light pollution. Thereby achieving the implementation of relevant laws, regulations and mandatory standards.

2.3.2.3 Upholding environmental responsibility after the withdrawal of new energy projects

Sungrow is committed to the environmental protection responsibility following the withdrawal of new energy projects, particularly in the cases of relocation, dismantling, or closure. We implement closed-loop environmental protection management across the entire life cycle of these projects. Sungrow aims to eliminate any negative environmental impacts through rigorous recycling initiatives, soil and water conservation efforts, vegetation restoration, and cleaning up of wastewater, solid wastes, and residual pollutants. All these actions are undertaken in strict adherence to the environmental protection requirements of the locations involved, ensuring that our operations leave minimum ecological footprints.

2.3.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

2.3.3.1 Strictly observe and implement national and local government environmental protection laws and regulations, standards, and company environmental protection rules and regulations.

2.3.3.2 Use all kinds of resources and energy in a scientific, efficient and economical manner, prioritizing environmentally friendly raw materials, clean energy, and renewable resources.

2.3.3.3 Actively participate in environmental protection training and public welfare activities, and continuously improve the ability to identify environmental risks and related professional skills.

2.3.3.4 Perform, monitor, and report as required. Promptly report any potential environmental risks and take

necessary, safe measures.

2.4 Finance and Tax Payment According to Law

2.4.1 Commitment and Goals

We are committed to upholding legal compliance, honest, transparent, and sound operations in our Group's finance and tax affairs. Sungrow strictly complies with the financial and tax laws and regulations and regulatory requirements in the jurisdiction of its business activities. We are committed to enhancing our financial management level, adhering to the principles of industry-finance integration, precision and efficiency, digitalization and safety compliance. Thus, we facilitate the enhancement of operational efficiency and effectiveness, as well as prevention and control of operational risks.

2.4.2 Basic Policies

2.4.2.1 Satisfy financial and accounting requirements

Sungrow establishes and continuously enhances its accounting and financial management system and control processes, records and reports all revenues and expenditures on time, monitors the cash flow and inventory, and prevents any illegal and illicit behaviors such as misappropriation of funds, embezzlement, theft, fraud. Sungrow diligently fulfills its accounting records and financial reporting obligations, and strictly prohibits the preparation or providing false financial information. It is strictly prohibited to misstate costs and expenses, make off-the-books expenditures, or to set up undisclosed funds. Thus, we ensure strict compliance with accounting standards and relevant laws and regulations on financial management.

2.4.2.2 Strengthen tax management

Sungrow firmly instills the principles of compliant operation and lawful tax. We strictly adhere to the tax-laws and regulations of the jurisdictions where we operate, consistently improve the tax management system, and control the tax risks. We strengthen the audit and eliminate the practices of issuing false invoices and transaction vouchers. Sungrow ensures timely and truthful payment of all taxes and fees, fulfilling its tax obligations in accordance with the law.

2.4.2.3 Strictly control debt and financial risks

Sungrow continuously strengthens the dual control of asset-liability ratio and the scale of interest-paying debt, strictly controls the risk of debt default and dispersion. We strengthen the management of contract fulfillment, and improve the legal protection for the clearance of accounts receivable. We strengthen the control

of high-risk ventures such as entrusted wealth management, financial derivatives, and prohibit the illegal collection of funds and guarantees. We ensure that false business prepayment and material transactions are not used to disguise inter-enterprise lending or similar activities. Additionally, we closely monitor international financial markets to effectively manage exchange rate risks in accordance with the laws and regulations.

2.4.3 Core Requirements

All members of Sungrow should comply with the following core requirements :

2.4.3.1 Comply with the Group's financial system, be familiar with the approval process, expense reimbursement standards, and internal control measures. Strictly prohibit any forms of falsification, including but not limited to fabricating business implementation (activities), misusing of subsidies/grants for profit, altering operational records, inflating reimbursement claims, providing false invoices or forged receipt statements; and forging signatures or documents for account approvals.

2.4.3.2 Abide by national and local tax laws and regulations, accurately and truthfully declare all taxes and fees in a timely manner, promptly pay these taxes, and fulfill the civic obligation of tax compliance as mandated by law.

2.5 Asset Management and Utilization

2.5.1 Commitment and Goals

We are dedicated to safeguarding and judiciously utilizing the Company's assets. This includes capital and fixed assets such as office space, plants, equipment, tools, as well as inventory, office supplies and other current or long-term assets. It also covers equity, land use rights, confidential information, brand goodwill, intellectual property rights, non-patented technologies, business opportunities and information assets. We commit to eliminating waste, preventing illegal appropriation, and avoiding concealment or abuse of these assets.

2.5.2 Basic Policies

2.5.2.1 Asset management

Sungrow consistently maintains a robust asset management system, ensuring precise recording and categorization of all fixed and current assets. We prohibit any organization or individual from infringing upon the legitimate rights and interests of stakeholders through concealment or debt fabrication. We commit to properly

safeguarding the Company's assets, adhering to legal requirements for asset acquisition, utilization, trading, and disposal.

2.5.2.2 Security precautions

Sungrow implements appropriate security measures to protect the company's asset and mitigate losses and risks. These measures include acquiring equipment and facilities for safe production, implementing access control systems, conducting regular safety inspections, and ensuring the regular maintenance and repair of equipment.

2.5.2.3 Intangible asset management

Sungrow consistently maintains a robust management and protection system for intangible assets. We implement targeted management measures for various types of intangible assets, ensuring their safeguarding against infringement, illegal usage, and abnormal value depreciation.

2.5.3 Core Requirements

All members of Sungrow are obliged to protect the Company's assets and are required to comply with the following core requirements:

2.5.3.1 The custody and utilization of company assets must strictly adhere to the Company's regulations, ensuring that they are utilized exclusively for legitimate and authorized purposes.

2.5.3.2 The utilization of company assets shall adhere to the principles of safety, scientific approach, reasonableness, and efficiency to prevent wastage or misuse of the Company's resources.

2.5.3.3 Company assets must not be used to make profits for individuals or third parties.

2.5.3.4 It is strictly prohibited to illegally acquire, utilize or disclose the Company's intellectual property rights and non-patented technologies, among other proprietary information.

2.5.3.5 The disclosure or divulgence of the Company's confidential information is strictly prohibited. Necessary preventive and corrective measures must be implemented against any infringement or leakage of confidentiality, as well as against potential infringements or leakages.

2.5.3.6 Uphold the goodwill of the company, and refrain from engaging behavior or making statement that could harm the company's reputation.

2.5.3.7 Without written authorization from the Company, employees shall not accept any type of media interviews on behalf of the Company, shall not express opinions in the media under the Company's name or act

as the representative of Company's employees, and shall not publish text, pictures, audio, video or any other information in the name of the Company through any form of media.

2.5.3.8 When participating in conferences, forums, seminars and other related activities, all remarks made must align with the Company's values and code of conduct. Employees shall refrain from disclosing the Company's commercial confidential information or undisclosed information.

2.6 Intellectual Property Rights and Trade Secret Protection

2.6.1 Commitment and Goals

We are committed to the "Intellectual Property Rights Protecting Sungrow's Industry" strategy, and to the lawful protection of our intellectual property rights and trade secrets. We respect the intellectual property rights and trade secrets of others, and utilize relevant intellectual property rights and trade secrets only in accordance with applicable regulations.

2.6.2 Basic Policies

2.6.2.1 Establish intellectual property protection system

Sungrow establishes a robust intellectual property strategic planning, organizational structure and institutional framework, by establishing dedicated entities such as Intellectual Property Center, Decision-Making Committee, and Evaluation Committee. This framework ensures the timely protection of the Group's innovative achievements through patent applications, trademark registrations and copyright protections. We meticulously adhere to all legal and regulatory requirements throughout the entire intellectual property lifecycle, including rights acquisition, utilization, licensing and transfer. We employ legal means to prevent and address any infringement on the Group's patented technologies, trademarks and creative works. Sungrow proactively implements legitimate early warning mechanisms to deter and halt unauthorized use or infringement of the Group's patented technologies, trademarks and creative works.

Sungrow implements early patent warning measures to gain a comprehensive understanding of developments and competition situations within the sector. Through timely patent risk identification, research and analysis, we proactively respond to the potential risks, effectively reducing the risk of product infringement.

2.6.2.2 Proper protection of trade secrets

Sungrow ensures the meticulous protection of trade secrets through the execution of confidentiality agreements and the implementation of technical protection measures. These measures clarify the confidentiality obligations of all stakeholders, thereby reducing the risks associated with unlawful acquisition, replication, or utilization of commercial secrets. Concurrently, we strictly prohibit the illicit theft of others' trade secrets, and uphold the confidentiality of legally known trade secrets, all in strict adherence to the law.

2.6.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

2.6.3.1 Invention patents obtained primarily through work tasks or resources provided by Sungrow shall be considered job-related invention creations.

2.6.3.2 Unauthorized transfer, disclosure, copying, storing, retention, tampering with and destruction of any intellectual property rights and trade secrets of the Group is strictly prohibited without the consent and authorization of the Group.

2.6.3.3 Strengthen the awareness of confidentiality, adhere to the confidentiality requirements, refrain from discussing the Group's confidential information in public, and implement necessary confidentiality measures when handling sensitive information.

2.6.3.4 Familiarize with the Group's intellectual property Policies, understand the ownership of new products and technologies developed within the Group, and take measures to safeguard the Group's intellectual property rights.

2.6.3.5 Promptly report and actively cooperate in the investigation of compliance-related issues involving intellectual property infringement, trade secret leakage.

2.7 Information Security Compliance

2.7.1 Commitment and Goals

In our operations, we steadfastly adhere to all applicable laws, regulations, and regulatory requirements on network security, as well as data acquisition, storage, processing, transmission, and protection of data. We continually refine our information security compliance management system to align with evolving legal

framework, best practices, and international treaties. We have established a robust feedback mechanism which is regularly enhanced to effectively incorporate valuable insights from relevant stakeholders, to eradicate any breaches of regulatory obligations and prevent any intentional infringement of others' rights and interests, and at the same time safeguard our legitimate rights and interests from being infringed upon. Central to our ethos is ensuring that the information in our stewardship remains complete, accurate, secure, and confidential.

2.7.2 Basic Policies

2.7.2.1 Comprehensive protection of network and data security

At Sungrow, we are continuously enhancing our information security management system and developing a mature information management system. Sungrow strictly adheres to the General Data Protection Regulation (GDPR) and the Network and Information Security (NIS) Directives. We are committed to employing safe and reliable products and equipment, consistently conducting network security risk assessments, security inspections and emergency response drills, to fortify the emergency response capacity for network security incidents.

2.7.2.2 Manage data in accordance with laws and regulations

At Sungrow, we adhere strictly to applicable laws, regulations, and mandatory standards in the industry on data compliance and confidentiality, **particularly focusing on GDPR compliance**. We place a strong emphasis on internal data management, to ensure that the entire cycle of data - collection, storage, processing, transmission, exchange and destruction - is managed lawfully and in full compliance. We vigilantly monitor data flow, proactively prevent data leakage, and guarantee that any security incidents can be addressed swiftly and effectively.

2.7.2.3 Emphasis on incident response and breach notification

In line with GDPR's 72-hour breach notification requirement, Sungrow has established clear protocols for managing data breaches. We will promptly notify the relevant Data Protection Authority and any affected individuals if a data breach occurs. Our incident response plan includes immediate containment measures, internal reporting protocols, and procedures for communication and remediation.

2.7.2.4 Emphasis on cross-border data regulation

Sungrow places equal emphasis on safeguarding of cross-border data. We meticulously adhere to the applicable laws and regulations of the jurisdictions involved in cross-border data transactions, particularly

focusing on GDPR compliance. This includes personal privacy protection, data transfer regulations, and security standards for data processing and storage. Our objective is to ensure that the cross-border data flows within a lawful, secure and reliable environment. Sungrow reinforces identity authentication and access control measures for cross-border data while establishing a security review mechanism to prevent data theft, tampering, or destruction throughout its lifecycle.

2.7.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

2.7.3.1 The storage method, duration, and cross-border transmission of relevant information and data shall comply with the requirements of applicable laws and regulations, including but not limited to the General Data Protection Regulation (GDPR).

2.7.3.2 Clearly state the purposes for which information and data are collected and collect only the necessary information and data. This ensures compliance with the principle of data minimization under GDPR.

2.7.3.3 Except as required by law, consent from the relevant data subjects shall be obtained before processing personal information. Timely responses shall be provided to reasonable requests from information or data subjects, and relevant information and data shall not be disclosed without proper authorization, in accordance with GDPR requirements.

2.7.3.4 Strictly comply with national or regional confidentiality laws and regulations, and the provisions of the confidentiality system of Sungrow Group. Any incidents or potential breaches of confidentiality must be promptly halted and reported, enabling the company can take immediate action.

2.7.3.5 Actively take effective measures to prevent any damage, alteration, loss, leakage, and unauthorised access of relevant information and data. Regular security audits and updates should be conducted to enhance data security.

2.7.3.6 Avoid retaining unnecessary personal information within office premises or on office equipment provided by the Group, such as office telephones and computers, and pay attention to the protection of one's privacy.

2.7.3.7 Enhance information security awareness, and improve the proficiency in data security protection

and emergency handling of network security incidents. This includes regular mandatory training on data protection laws like GDPR.

2.7.3.8 Clarify the division of responsibilities, actively participate in network security and data privacy protection training and drills, and familiarize with countermeasures. Be well-prepared to respond swiftly in relevant situations, ensuring compliance with incident response protocols.

2.7.3.9 When transmitting data and documents across borders, strictly comply with the local cross-border data regulations. In cases where the magnitude and sensitivity of cross-border data approach the monitoring thresholds of local regulations, advice should be sought from the Data Protection Officer (DPO) before proceeding with the cross-border transfer.

3 Protect Employees' Rights and Interests in accordance with Law

3.1 Respect, Equality, Diversity and Inclusion

3.1.1 Commitment and Goals

At Sungrow, we regard all our employees as our most valuable assets. We strive to create a warm, enjoyable, and safe working environment. We prioritize our employees' physical and mental well-being, provide them with diversified, inclusive, equal, and positive development opportunities, and motivate, empower, and respect every worker.

Diversity and inclusion are fundamental principles at Sungrow. We strive to create a supportive workplace where respect is shown to all, regardless of age, ability, gender reassignment, marital status, pregnancy, race, ethnicity, culture, sexual orientation, religion, sex, or any other factor. All Sungrow members are supported and encouraged to perform to their potential.

3.1.2 Basic Policies

3.1.2.1 Protection of human rights

All employees shall be treated with fairness and dignity. We are committed to fostering a workplace where human rights and workplace rights are vigorously protected and respected. This commitment aligns with our

adherence to international standards and local laws in every country or region where we operate. We embrace globally recognized human rights principles, including, but not limited to, those stated in the *United Nations Guiding Principles on Business and Human Rights*, the *Ten Principles of the United Nations Global Compact*, and the International Labor Organization's *Declaration on Fundamental Principles and Rights at Work*.

We maintain a zero-tolerance policy towards any form of forced or child labor, and are dedicated to preventing workplace abuse, bullying, and harassment. We ensure that work conditions are fair, safe, and consistent with the highest ethical standards.

3.1.2.2 Anti-Discrimination

At Sungrow, we respect and embrace the diversity of our employees, including their various opinions, viewpoints, and beliefs. We are committed to fostering an inclusive environment where each employee has access to fair and equitable opportunities for development. Our policy strictly prohibits any form of discrimination in employment, including during hiring, compensation, promotion, discipline, termination, or retirement, based on nationality, gender, race, religion, age, disability, sexual orientation, political opinion, social group, ethnic origin, or any other personal characteristic.

3.1.2.3 Protection of personal information and privacy

Sungrow is dedicated to handling personal information responsibly, including but not limited to collection, storage, use, transmission, transfer, sharing, and destruction, guided by principles of legality, legitimacy, and necessity. We strictly comply with applicable laws and regulations and confidentiality commitments in all business dealings with our partners and third parties. We are committed to maintaining the confidentiality and security of employee information, ensuring that all personal data is processed fairly and transparently, and used only for legitimate purposes directly related to employment.

3.1.2.4 Anti-Harassment

Sungrow is committed to providing a harassment-free workplace. We strictly enforce a zero-tolerance policy towards all forms of sexual harassment, workplace harassment, and bullying. We promote a culture of respect and dignity, where inappropriate behaviors, such as disrespect, rudeness, slander, defamation, libel, offensive or threatening speech, mistreatment, personal attacks, and other negative remarks or behaviors, are not tolerated.

3.1.2.5 Satisfying the requirements for remuneration and benefits

Sungrow ensures that our remuneration and benefits structures, including paid leave and health protection, comply with the applicable employment standards and best practices in the jurisdictions where we operate. We are committed to providing employees with timely and fair compensation, ensuring that all work hours, overtime, and leave entitlements are in accordance with established policies and standards. Our goal is to ensure that employees are fairly rewarded for their contributions and that they have access to a healthy work-life balance.

3.1.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

3.1.3.1 Uphold the core values of Sungrow, namely honesty and trustworthiness, integrity and self-discipline, equal treatment, mutual trust and respect.

3.1.3.2 Prohibit all forms of discrimination, which encompass discrimination based on nationality, gender, race, religion, ethnicity, customs, dress, cultural differences.

3.1.3.3 Emphasize the protection of personal privacy for everyone, while respecting and not infringing upon the privacy of others.

3.1.3.4 Prohibit all forms of harassment, which encompass inappropriate speech and conduct, verbal threats, ill treatment, personal attacks and other adverse behaviors.

3.1.3.5 Prohibit all forms of forced labor, such as prison labor, slave labor, labor conducted under intimidation or duress, and any other instances of coerced or involuntary labor, and refrain from engaging in business relationships with any third party involved in human trafficking or forced labor.

3.1.3.6 Prohibit all forms of child labor. We comply with applicable national and international standards and rules concerning the minimum age of employment for children, and observe all legal requirements, including those pertaining to hours of work and overtime, wages, job types and working conditions. Employees under 18 must not be employed in hazardous working conditions.

3.2 Occupational Safety and Health

3.2.1 Commitment and Goals

We are dedicated to the principle of “people-oriented, life-first” and strictly comply with occupational health

and safety laws and regulations. We conduct comprehensive assessments to identify occupational health and safety risks and implement control measures to mitigate existing or potential hazards. Sungrow provides occupational health and safety education and training to enhance employee awareness, and supplies appropriate personal protective equipment to safeguard the safety and well-being of all employees, and actively encourages employees to participate in occupational health management, thereby fostering a healthier and safer working environment.

3.2.2 Basic Policies

3.2.2.1 Ensure the safety of production sites

Sungrow continually enhances the Group's occupational health system in strict compliance with the applicable laws and regulations related to production safety and industry mandatory standards of the jurisdictions where it operates. This involves formulating systems and measures to ensure the safety of employees' lives and workplaces, ensuring the safe operation of workplaces through regular inspection and maintenance of facilities and equipment, providing employees with training on the correct usage and operation of relevant equipment, and furnishing the necessary safety protection equipment.

3.2.2.2 Prohibit drug abuse

Sungrow explicitly prohibits employees from using any illegal drugs or excessive consumption of prescription drugs during working hours or within the workplace premises. Employees found to have issues related to drug abuse will be subject to strict disciplinary actions in accordance with applicable laws.

3.2.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

3.2.3.1 Employees must acknowledge and be fully aware of potential risks and challenges in the working environment, possess knowledge of safety regulations and procedures regarding their roles, and remain vigilant at all times.

3.2.3.2 Strictly comply with the Group's occupational health and safety systems and safety operation procedures, and must correctly utilize labor protective equipment, personal protective equipment and various types of equipment, ensuring that their conduct aligns with safety requirements.

3.2.3.3 Employees are obliged to comply with applicable health and safety standards to prevent the

transmission of diseases.

3.2.3.4 Prohibit drug abuse, and any health issues should be treated with medication under the proper guidance of a doctor.

3.2.3.5 Employees are expected to actively collaborate with the company in occupational health and safety management and provide valuable opinions and suggestions.

3.2.3.6 Monitor their physical condition, refrain from overloading themselves, and avoid prolonged periods in the same position to minimize the risk of muscle fatigue and injury.

3.2.3.7 Employees must promptly report any occupational health and safety risks, hidden dangers or accidents to their supervisors or safety management personnel to ensure timely corrective measures are taken.

3.2.3.8 Actively participate in occupational safety and health training and awareness campaigns to enhance their awareness of occupational safety and health and their knowledge and skills in emergency response.

3.3 Conflict of Interest

3.3.1 Commitment and Goals

We strive to prevent circumstances in which our personal interests may come into conflict with those of the enterprise or potentially give rise to conflicts. We are committed to safeguarding the interests and reputation of the enterprise. Meanwhile, to protect our own interests, Sungrow requires employees and their families to comply with the relevant restrictions after the termination of employment.

3.3.2 Basic Policies

3.3.2.1 Avoid conflict of interest

In principle, Sungrow prohibits employees and their families from engaging in any conflict of interest with the Company. Sungrow maintains open and effective communication with its employees, emphasizing core principles such as professional ethics, honesty and transparency, impartiality and fairness. The company actively assists employees in developing a proper awareness, ensuring a clear understanding of the Group's values and moral boundaries to prevent conflict of interest.

3.3.2.2 Enhance proactive reporting

To safeguard the legitimate rights and interests of the Company and its employees, Sungrow encourages

employees to transparently report any potential conflicts of interest. It is our responsibility to offer constructive feedback and support in response to such disclosures, concerns, and suggestions. Employees are required to proactively report any conflicts in writing, particularly those arising from genuine business needs or pre-existing situations.

3.3.2.3 Highlight non-compete policy

In line with Sungrow's non-compete policy, employees should refrain from engaging in any competitive activities that may conflict with Sungrow's interests, both during and after their employment within the specified period. This policy defines its scope and duration of non-compete requirements, ensuring adherence to legal requirements. It is consistently reviewed and monitored to align with relevant laws and regulations. The policy further includes streamlined resignation procedures, legally mandated economic compensation for employees bound by non-compete agreements, and documentation of all non-compete agreements and compensation payments.

3.3.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

3.3.3.1 Employees must avoid any conflict between their personal interests and their professional duties at Sungrow. This includes vigilantly preventing conflicts of interest in all professional conduct, promptly report any actual or potential conflicts to the immediate supervisor or HR, and always prioritize the Company's interests over personal gains in professional decisions.

3.3.3.2 Providing any information or service to competitors is prohibited.

3.3.3.3 Engaging in part-time jobs that may affect the Group's interests without prior approval from Sungrow is prohibited.

3.3.3.4 Taking advantage of Group's trading opportunities is prohibited.

3.3.3.5 In any instance where unavoidable conflict of interest arises, it is mandatory to promptly report to the immediate supervisor or HR.

3.3.3.6 Comply with all applicable laws and regulations regarding non-compete restrictions, as well as with relevant internal policies.

4 Conducting Business Activities in Good Faith

4.1 Stakeholders Management

4.1.1 Commitment and Goals

Sungrow acknowledges the significant role of stakeholders management in its comprehensive compliance management framework. “stakeholders” refers to individuals or organizations that interact with, or are influenced by the Company’s compliance management system. This includes, but not limited to, the Company’s partners, customers, competitors, regulators, employees. Recognizing the unique influence and impact each stakeholder has on our company, Sungrow commits to legal compliance and ethical engagement to meet their expectations and demands. We strive to cultivate a value chain ecosystem characterized by integrity, sustainability and mutual benefit.

Sungrow is committed to treating all suppliers, distributors, service providers, and other third-party organizations (hereinafter collectively referred to as “partners”) with fairness and justice. Our partners are integral stakeholders of Sungrow. We seek cooperation with partners who uphold strong reputations and conduct their business with integrity, and we firmly oppose any form of fraud and deceptive practices.

4.1.2 Basic Policies

4.1.2.1 Recognize stakeholders and their expectations

Sungrow is committed to identifying and understanding the critical stakeholders in our development and operations, acknowledging the significance of their expectations.

4.1.2.2 Integrate stakeholder requirements

Sungrow maintains strict adherence to compliance as the foundation in all stakeholder interactions. We actively compile and organize stakeholders’ requirements and ensure their integration into our compliance management practices in a timely manner.

4.1.2.3 Establish Positive and lasting cooperative partnership

Sungrow is dedicated to fostering partnerships based on principles of integrity and fairness, openness and transparency, trustworthiness and mutual benefit. We aim to create a supply chain culture that values cultural convergence, close collaboration and shared responsibility. We guide our partners to strengthen ESG (Environment, Social, and Governance) management and actively encourage them to engage in internationally recognized carbon reduction initiatives and undertake social responsibilities, including public welfare and

environmental protection. We monitor our partners' governance activities appropriately, guiding them towards operations that are both ethical and compliant.

4.1.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

4.1.3.1 Engage with stakeholders following principles of fairness, respect, and good faith, and refrain from any actions that infringe upon their legitimate rights and interests.

4.1.3.2 Provide prompt feedback on expectations and aspirations of stakeholders that are collected and noted.

4.1.3.3 We commit to serving our customers with a focus on delivering excellent service. Prioritizing customer satisfaction is integral to our business ethos and practices.

4.1.3.4 At Sungrow, we are committed to maintaining a stable market competition order, beginning with our own actions. We adhere to social ethics and competition rules, and strictly prohibit any form of unfair competition. Our focus is on market expansion by leveraging the strengths of our services, products, and brands in a fair and ethical manner. This includes avoiding practices such as exaggeration or distortion of facts, denigrating competitors' products, services, financial status or business reputation, and refraining from illegally or improperly obtaining competitor's commercial secrets or confidential information regarding products, services and marketing strategies.

4.1.3.5 Sungrow is committed to adhering to the regulations set by regulatory authorities, assisting in sustaining the standardization and orderly governance of the industry's market. Our interactions with these bodies are conducted ethically and in accordance with the law. We ensure that any information provided to the regulators is accurate and reliable. In the event of omissions or inaccuracies, we commit to prompt communication and correction in line with established protocols.

4.1.3.6 When engaging in business cooperation with partners, it is essential to vigilantly safeguard the Company's legitimate interests while strictly adhering to the legal standards regarding unfair competition, anti-monopoly, anti-corruption and bribery. Our business approach is market-oriented, transparent, communicative, and in pursuit of mutually beneficial outcomes. We strictly comply with Sungrow's internal provisions and procedures regarding commercial contracts, focusing on mitigating commercial risks.

4.1.3.7 Employees should respect the diverse corporate cultures of the company and its partners, seeking

common ground while acknowledging and respecting differences, based on the principles of equality and mutual trust.

4.2 Anti-Corruption

4.2.1 Commitment and Goals

We take a “zero tolerance” attitude towards corruption, establish transparent, fair, honest, and clean foreign cooperative relationships, and fully comply with the anti-corruption laws and relevant laws and regulations in the places where we operate.

4.2.2 Basic Policies

4.2.2.1 Establish anti-corruption prevention mechanism

Sungrow actively builds a corruption prevention system, including periodic risk assessments to continuously evaluate and mitigate evolving risks. We have formulated relevant systems for management personnel’s behavioral management, reporting and complaint, employees’ integrity and self-discipline, and internal audit and supervision to ensure that anti-corruption work is governed by rules and regulations. We provide anti-corruption education for employees and partners through commitment letters, agreements, training sessions, advocacy and reminders, promoting a corporate culture of integrity and self-discipline.

4.2.2.2 Unimpeded reporting and complaint channels

Sungrow establishes efficient, unimpeded, open, and transparent reporting and complaint channels, with protection for whistleblowers to encourage reporting and appealing any non-compliance with business ethics. Sungrow investigates and addresses these issues appropriately and promptly in accordance with applicable laws.

4.2.2.3 Adherence to audit inspection

The Group has set up an independent Audit and Inspection Department, responsible for anti-corruption work. By strengthening the deterrence of corruption and forming a self-discipline culture, we ensure that the Group’s business operates in a compliant, orderly, and efficient manner.

4.2.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

4.2.3.1 It is strictly prohibited to take advantage of one’s position to solicit or appropriate property owned

or managed by the Company through direct or indirect means.

4.2.3.2 In handling official duties, one must strictly abide by ethical standards, avoiding power and money transactions to enhance self-restraint. It is prohibited to accept or solicit any property or benefit beyond the prescribed value from the Company's partners and their personnel, and to engage in improper economic dealings with subordinates or partners and their personnel, and use their position to seek private gain.

4.2.3.3 May not provide or accept gifts, meals or entertainment of a value greater than that allowed by applicable laws and regulations and the Group's policies.

4.2.3.4 Be courteous when refusing gifts, meals or other hospitality, and promptly explain the Group's relevant policies to the other party.

4.2.3.5 Gifts that cannot be refused or returned for various reasons shall be handed over to the Group with explanation and registration.

4.2.3.6 Improve the ability to recognize risks. Be alert to all forms of corruption and not be coerced or induced into illegal and rule-violating activities.

4.2.3.7 If aware of the acceptance of a bribe, firmly and promptly report it to the Group.

4.2.3.8 Participate in anti-corruption efforts, actively cooperate with relevant investigations by the Group and relevant departments, provide evidence truthfully, and not conceal or fabricate information, understanding the legal implications of non-compliance.

4.3 Anti-Bribery

4.3.1 Commitment and Goals

We oppose any form of bribery, but do not restrict legal and business ethical standards of courtesy. We comply with anti-bribery laws and regulations of the countries or regions involved, international conventions, and relevant Group internal control systems. We always uphold the principles of integrity and honesty in our business operations and strictly follow high standards of business ethics.

4.3.2 Basic Policies

4.3.2.1 Comprehensive anti-bribery policy

Sungrow has formulated an anti-bribery policy, expressly prohibiting any form of bribery by all employees

and specifying disciplinary measures for any violations.

4.3.2.2 Strict control of gifts and hospitality

Sungrow adheres strictly to applicable laws, regulations and internal policies regarding gifts and business hospitality, ensuring compliance with both legal and ethical standards. Any actions that could be perceived as misconduct or damaging to the Group's reputation should be avoided.

No inappropriate gifts or hospitality should be offered or accepted that could influence business decisions or operations.

4.3.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

4.3.3.1 It is prohibited to make any unlawful payments to public officials, partner employees, and their relatives and friends to influence their decisions or actions (including inaction). Any inducement to public officials that could influence governmental actions or decisions, benefit Sungrow in obtaining or retaining business, or introduce business to anyone, is strictly prohibited.

4.3.3.2 Gifts, meals, or other forms of hospitality must align with standard business practices, and not influence business decisions and independent judgment. Gifts or benefits that could be perceived as influencing decisions are not to be offered or accepted.

4.3.3.3 Gifts must reflect the Group's value and culture and shall not include cash, precious metals, gift cards, pre-paid consumption, marketable securities or luxury items. Business entertainment should follow guidelines of compliance, cost-effectiveness, practicality, and necessity.

4.3.3.4 Providing travel expenses to external parties should serve a legitimate business purpose and align with business practices and the integrity requirements of the recipient. Any form of inappropriate entertainment, including illegal or unethical activities, is strictly prohibited.

4.4 Fair Competition and Antitrust

4.4.1 Commitment and Goals

We commit to comply with antitrust laws, fair competition laws, and other market competition laws and regulations of the jurisdictions where we operate. We actively participate in the creation and upkeep of a market

environment that is fair, competitive, and orderly. Our efforts are directed towards preventing and countering anti-competitive practices, abuse of dominant market position, and excessive concentration of economic power.

4.4.2 Basic Policies

4.4.2.1 Conduct compliance review

Sungrow prohibits any form of monopolistic behavior. Prior to initiating procurement, sales, investment, merger and acquisition, or similar business activities, we conduct thorough antitrust and fair competition reviews. This includes a comprehensive analysis of compliance risk, and when necessary, fulfilling obligations related to the antitrust declaration of the place of operation.

4.4.2.2 Marketing and publicity

Sungrow is committed to ethical marketing practices with an internal control system. Sungrow prohibits misrepresentation, selective disclosure, and exaggeration of product functions in our marketing activities and publicity. It is prohibited to provide false or misleading information in external business engagements, ensuring the protection of the legitimate rights and interests of customers and competitors.

4.4.2.3 Legitimate acquisition and use of competitive information

Sungrow prohibits the use of any illegal or unethical means to acquire or use others' trade secrets or confidential information. This includes, but not limited to, inappropriate collection or receipt of proprietary or third-party confidential information from customers, competitors' employees, or other entities.

4.4.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

4.4.3.1 Be informed about the applicable antitrust and fair competition laws, regulations, and business practices of the jurisdiction where Sungrow operates, and conduct activities in compliance with these laws. Consult the Legal Department in case of any doubt.

4.4.3.2 Refrain from using industry associations and other entities to engage in unlawful contact or communication with competitors that violate laws, regulations or internal policies.

4.4.3.3 Avoid exchanging or discussing competitively sensitive information with competitors, such as pricing, costs, customer data, production or capacity data, future business strategies, or investment plans.

4.4.3.4 Prohibit espionage, bribery, theft, or other illicit activities to acquire competitive intelligence, and

avoid malicious dissemination of false information about competitors or their products and services.

4.5 Anti-Money Laundering

4.5.1 Commitment and Goals

In our commitment to combat money laundering, we adhere to all applicable anti-money laundering laws and regulations, align with the Group's financial system and management processes. We refuse to accept cash payments that violate regulations and avoid payments to non-transaction accounts or abnormal accounts, to diligently fulfill our anti-money laundering responsibilities and obligations. We do not engage in transactions with, or provide resources or support to, individuals or organizations associated with terrorism.

4.5.2 Basic Policies

4.5.2.1 Conduct due diligence investigation

We prudently conduct identity verification of our customers, partners, and third parties. Our partnerships are limited to those with lawful and transparent financial operations. When necessary, we conduct due diligence on our partners and the assets involved in our transactions.

4.5.2.2 Attention to payment transactions

Sungrow vigilantly monitors payment transactions for irregularities, including, but not limited to, payments in unexpected currencies, cash or equivalent transactions, and transactions involving high-risk countries or regions. This further extends to payment from non-partners, and transactions that appear disconnected from legitimate business relationships.

4.5.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

4.5.3.1 Strictly abide by the Company's financial management system, ensuring accurate record-keeping of all financial transactions. Documentation such as bank documents, business vouchers, account books are preserved to ensure transparency and traceability of Cash flows.

4.5.3.2 Strictly comply with anti-money laundering regulations, register and retain information on any suspicious situations encountered. Prompt reporting to the Group Finance Center and the Legal & Compliance Department is mandatory, and when necessary, reporting to the relevant regulatory authorities

4.6 Trade Control and Economic Sanctions

4.6.1 Commitment and Goals

We are committed to complying with all relevant trade sanctions and export control laws and regulations, including those related to customs supervision, export controls, sanctions, visas, homeland security laws and international conventions. We continuously monitor and adapt to changes in these laws, regulations, and policies, ensuring our compliance commitments to partners and fulfilling our legal obligations. We avoid any offshore investment projects that are legally prohibited.

4.6.2 Basic Policies

Sungrow diligently upholds lawful cross-border trade practices, adhering to relevant customs regulations and supervision. We stay informed about changes in international trade laws and regulations, including export control and sanction/anti-sanction policies, as well as the varying law enforcement practices across countries. Our focus is on monitoring, analyzing, and staying updated on related disputes and conflicts; and maintaining orderly and secure management of trade-related data, information, materials, and documents, ensuring safety, accuracy, authenticity and traceability.

4.6.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

4.6.3.1 Keep abreast of rapid changes in international trade laws and regulations. Consult the Legal Department for clarifications.

4.6.3.2 Consider and adhere to the import and export regulatory requirements of various countries or regions. Prior to initiating business activities, conduct due diligence and comprehensive planning to ensure successful business implementation.

4.6.3.3 For effectively managing export control and trade sanctions, Sungrow implements a comprehensive and coordinated planning approach, ensuring compliance with applicable laws regarding export control, sanctions, and data protection. Conflicts between different legal frameworks are evaluated and addressed as part of our ongoing commitment to uphold international legal standards and navigate the complexities of global trade regulations.

5 Active Fulfillment of Social Responsibilities

5.1 Community Integration and Communication

5.1.1 Commitment and Goals

We are committed to actively engaging in social communication and public welfare activities, focusing on fostering relationships in our operational areas, contributing positively to society, and ensuring seamless integration of the enterprise within the community. Sungrow encourages its employees to participate in social welfare and volunteering, aligned with the Group's mission.

5.1.2 Basic Policies

Sungrow prioritizes its corporate image and brand reputation. In our social activities and external communication, we maintain composure and confidence, foster positive interactions with society, and showcase the Group's proactive and healthy image, thereby enhancing our reputation and influence.

Sungrow strives to provide local employment, training, and development opportunities and actively fulfills its social responsibilities.

Sungrow maintains close contact and good communication with the government agencies, social organizations, and residents of the areas where it operates, fostering mutual benefit and cooperative relationships.

5.1.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

5.1.3.1 Comply with the applicable laws and regulations of the jurisdiction where Sungrow operates, respect local culture and business customs, and maintain positive interaction with the local community.

5.1.3.2 Maintain necessary communication with regulators, government authorities and social organizations of the jurisdiction where Sungrow operates. Strive to enhance their understanding and support of the Group's operations, development and business activities, and actively participate in local public welfare, cultural, and various communication activities.

5.1.3.3 Promptly report to the competent authorities any public event, public relations crisis, or other incidents that may adversely affect the group's interests.

5.2 Social Responsibility

5.2.1 Commitment and Goals

Sungrow adheres to its corporate citizenship, continually launching public welfare investment and voluntary activities in ecological protection, energy conservation and emission reduction, education support, poverty alleviation, community development and disaster relief. We strive to contribute our expertise to society and encourage employee participation in public welfare efforts, aiming to generate extensive and enduring social value.

5.2.2 Basic Policies

5.2.2.1 Improve product quality and safety

Sungrow achieves a harmonious balance between social and economic benefits by delivering high-quality and safe products and services. High-quality products and services can satisfy consumers' needs and improve their quality of life. At the same time, it also means that Sungrow can obtain higher market competitiveness and thus more economic benefits. By pursuing high quality and innovative products and services, Sungrow can realize both social and economic benefits.

5.2.2.2 Abide by business ethics

Sungrow upholds business ethics through transparent operation, openly disclosing decisions and activities that significantly impact local society, economy and environment, and conducts its corporate activities in accordance with internationally recognized ethical business standards.

5.2.2.3 Participation in social welfare undertakings

Sungrow focuses on ecological protection, supports scientific and technological innovation, education and professional development, poverty eradication, and community support, including disaster aid and other voluntary social welfare fields, pays attention to social issues, while actively participating in various voluntary social welfare initiatives.

5.2.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

5.2.3.1 Foster correct values, clarify individual mission and responsibility within the organization, understand the relation between one's work and organizational growth, and recognize personal value and

contribution to achieve a synergy of social and economic benefits.

5.2.3.2 Focus on personal and organizational sustainable development. Through rational resource utilization, environmental impact reduction, and practicing corporate social responsibility, propel the organization towards sustainable growth, enhancing its social reputation and competitiveness, and thereby generating greater economic benefits.

5.2.3.3 Utilize spare time to participate in volunteer activities organized by the government, community organizations and the company, enhancing social responsibility awareness and teamwork skills.

5.3 External Donation

5.3.1 Commitment and Goals

We actively engage in charitable causes and support the development of the communities where we operate. Our participation in donation activities adheres strictly to applicable laws and regulations. In cases of major disasters or urgent humanitarian needs within our operational areas, Sungrow provides necessary funding or assistance, ensuring all donations comply with legal and ethical standards.

5.3.2 Basic Policies

5.3.2.1 Donation recipients and scope

Sungrow's external donations align with the scope defined by the Group. Recipients include public welfare social organizations and public welfare non-profit organizations, socially disadvantaged groups or individuals in need. Our donation process is transparent, ensuring the recipient identity and the donation are clear and properly documented.

5.3.2.2 Prohibition of improper interests

Sungrow's external donations shall not be used to convey or obtain improper benefits. To ensure the philanthropic nature of the donation, no conditions for benefit return are attached to the recipients.

5.3.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

5.3.3.1 All external donation activities are centrally managed and authorized by the Group's brand center according to the internal policies. Employees are prohibited from conducting or participating in unauthorized

donation activities on behalf of the Group.

5.3.3.2 Ensure that donation objectives, causes, amounts, and methods of donation align with the Group's internal policies. Changes to the use of donated funds or materials shall not be made without proper authorization.

5.3.3.3 Before donating, verify the counterparty's identity, clarify the donation purpose and the usage requirements, sign necessary agreements, and maintain accurate records.

5.3.3.4 External donations must not be used to solicit or accept kickbacks, commissions, information fees, labor fees, or other improper benefits.

5.3.3.5 Avoid donations that could potentially harm the image and reputation of the Group.

6 Compliance Management Support

6.1 Compliance Consultation and Reporting

6.1.1 Commitment and Goals

We are committed to establishing an effective compliance counseling and reporting mechanism, encouraging all employees, customers, partners, and other stakeholders to seek guidance or report compliance risks or violations through appropriate channels. Our aim is to foster an open, honest, and responsible corporate culture.

6.1.2 Basic Policies

6.1.2.1 Provide compliance counseling

Employees may consult the Compliance Department for any questions related to this Code through the designated channel or system.

6.1.2.2 Establish reporting channels

Any unit, employee, customer, partner, or other stakeholder of Sungrow may consult or report any known or suspected violation through the established channels. Reports will be reviewed and investigated in accordance with legal requirements.

6.1.3 Core Requirements

All members of Sungrow should comply with the following core requirements:

6.1.3.1 If employees encounter compliance doubts, they should first consult with their line managers. If unresolved, further communication with the Compliance Department is advised.

6.1.3.2 Any unit, employee, customer, partner and other stakeholder may consult or report on any violation or suspected violation found. Maintaining anonymity is an option.

6.1.3.3 All consultations and reports must be kept strictly confidential.

6.1.3.4 No one may, by any means, prevent, intimidate, or suppress whistleblowers, nor retaliate against them.

6.1.3.5 Whistleblowers whose reports lead to effective audits or investigations and positively impact the company will be rewarded accordingly.

Date of Issue: August 29, 2024

Approved By: Lewis Li, President of Sungrow Europe