

# Whistleblower Policy

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## Introduction

At Sunrun, we are committed to delivering a high level of ethics and integrity in the way we do business. All accounting, internal accounting controls, auditing, and other legal concerns and complaints received are taken seriously.

The Whistleblower Policy sets out Sunrun's standards around reporting and investigations so that individuals may raise concerns free of any harassment, discrimination, or retaliation, and know that their concerns will be investigated. Therefore, the Whistleblower Policy should be read in conjunction with the Code of Business Conduct & Ethics (the Code) and other relevant policies. This Policy sets out how Sunrun will support us so that we can safely express our concerns without fear of retaliation, know who to contact, how to make a report, and the protections available to us.

# What is whistleblowing and who is a whistleblower?

Whistleblowing is the act of disclosing, reporting or drawing attention to alleged wrongdoing, misconduct, unethical activity, corruption, or other illegal or undesirable acts.

A whistleblower is someone who discloses reportable conduct, as defined in the Reporting section, under this Policy. A whistleblower can be a current or former employee, supplier, contractor, relative, dependent, or spouse.

## Differences between grievance and whistleblowing concerns

Grievance	Whistleblowing concern
The concern is an individual or personal matter (or what is not a whistleblowing concern). This is usually handled by the respective head of department and/or Employee Relations.	The concern is about non-personal matters such as fraud, questionable accounting, gross negligence, or intentional errors in internal and reporting controls of the Company or any of its direct and indirect subsidiaries.
Examples	Examples
Terms of employment	Fraudulent accounting practices
Remuneration and performance appraisal	Threats to health or safety of employees and/or the public
Allegations of unfair treatment at work	Theft, corruption, bribery, kickbacks, or embezzlement
Bullying and harassment	Abuse of power
Disagreements among employees or between employees and management	A deliberate attempt to cover up any of the above

# Reporting

## Why to report

Sunrun maintains a workplace environment where all employees can raise concerns in good faith free of any harassment, discrimination, or retaliation. We have a professional responsibility to report behavior that goes against company policy or laws and regulations. We are crucial in detecting corrupt, illegal, or other undesirable conduct. Sunrun strongly encourages us to speak up if we suspect or witness any matters of concern.

## What to report

We should report and submit complaints related to questionable accounting, internal accounting controls or auditing matters, reporting of fraudulent financial information, violations of securities laws or other laws, rules and regulations, or any activities or transactions which appear to violate the Code, company policies, or laws and regulations. We should provide as much detail as possible regarding dates, times, places, names, actions or inactions, statements made, or any other evidence that could be helpful to investigate the allegations.

### Scenario

**You and another employee have been wrapping up the company's quarterly accounting reports that are required for the U.S. Securities and Exchange Commission (SEC). You notice some errors in the reporting and mention it to your co-worker. Your co-worker responds with, "Yeah, I couldn't get the accounts to reconcile, so I just decided to finalize as is. I mean, it's not off by much." Should you report this?**

Yes. This is an intentional accounting error that is in violation of SEC requirements. It could negatively impact the company, and if not reported, it could impact you.

### Examples of reportable conduct

- Illegal conduct, such as theft, violence, or criminal damage to property
- Money laundering or misappropriation of funds
- Offering or accepting a bribe
- Violations against Sunrun's internal policies such as the Insider Trading Policy or Global Anti-Corruption Policy
- Fraud, deliberate error or gross negligence or recklessness in the preparation, evaluation, review or audit of any financial statement of the Company
- Fraud, deliberate error or gross negligence or recklessness in the recording and maintaining of financial records of the Company
- Deficiencies in, or noncompliance with, the Company's internal accounting controls
- Misrepresentation or false statement to management, regulators, the outside auditors or others by a senior officer, accountant or other employee regarding a matter contained in the financial records, financial reports or audit reports of the Company; and deviation from full and fair reporting of the Company's results or financial condition

## When to report

You should report and submit complaints regarding potential violations of the Whistleblower Policy, the Code, or other applicable policies and laws as soon as possible.

Timeliness is important because, as with all investigations, evidence may deteriorate, disappear, or otherwise become harder to discover or less useful as time passes.

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## How to report

Non-employees can submit complaints regarding accounting, internal accounting controls, or auditing matters through the mailing address listed below.

Employees can submit concerns regarding accounting, internal accounting controls, or auditing matters they believe to be questionable through the mechanisms listed below. It shall be emphasized to employees that each of the methods of submitting complaints listed below may be used anonymously and that such complaints shall be treated confidentially unless restricted by law.

Except for complaints sent directly to the Audit Committee, all complaints will be forwarded to the Chief Legal Officer (or the Chief Financial Officer if the report relates to the Chief Legal Officer) for coordination of investigations.

**We should report issues immediately to our manager. If that method is not appropriate, we can report concerns through the following mechanisms:**

### **Open door policy**

Speak with your manager, a member of your management team, the People Team, and/or executives.

### **Legal and Compliance**

[integrity@sunrun.com](mailto:integrity@sunrun.com)

### **Audit Committee**

[audit@sunrun.com](mailto:audit@sunrun.com)

### **Ethics Hotline**

855-477-8862

[sunrun.ethicspoint.com](https://sunrun.ethicspoint.com)

### **Mailing address**

Sunrun Inc.

Attn: Chief Legal Officer

225 Bush St #1400

San Francisco, CA 94104

# Investigations

## Before investigations

Before making a whistleblower report, we should satisfy ourselves that we have reasonable grounds to suspect reportable conduct. Such reasonable grounds are based on our honest perspective or suspicion based on facts that an incident has occurred or is occurring that could harm other employees, customers, or the reputation of the company.

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## During investigations

All reports made in good faith are taken seriously by Sunrun and assessed carefully to determine whether an investigation is required. A good faith report is any report in which the person making the report has reasonable cause to believe the reported allegations are true and is made without malice or consideration of personal benefit.

All complaints that are received will be stored and tracked in the Ethics Hotline platform, which is a third-party hosted web portal, and it is used for documenting and retaining investigation records.

All accounting and auditing complaints received will be documented in the source of record for tracking accounting, auditing, and other whistleblower related complaints, and will include the date the complaint was received, a description of the complaint, the submitter (if provided), and the status and disposition of the investigation of the complaint once completed.

The following matters will be reported to the Audit Committee upon discovery:

- Matters related to violations or potential violations of the Global Anti-Corruption Policy;
- Matters associated with the Company's revenue recognition policies or which involve accounting, internal accounting controls and auditing matters;
- Matters related to the Company's executive officers, and
- Matters as the Chief Legal Officer deems significant.

All other complaints regarding accounting or auditing concerns will be reviewed under the direction and oversight of the Chief Legal Officer (or the Chief Financial Officer if the report relates to the Chief Legal Officer), who will involve other parties as appropriate. The Chief Legal Officer, or delegate, will provide the Audit Committee with a quarterly report of all accounting and auditing complaints and provide an update of pending investigations. The Audit Committee may request special treatment for any complaint and may assume the direction and oversight of an investigation of any such complaint.

Complaints that are not related to accounting or auditing concerns, will be tracked separately and will be forwarded to the appropriate person or department for investigation, unless the Chief Legal Officer deems that other treatment is appropriate.

## After investigations

Sunrun will provide notification to the whistleblower once the investigation has been completed. Sunrun may be unable to disclose particular details or the outcome, or more than the fact that the investigation was completed. Records will be retained in accordance with internal policies and applicable laws and regulations.

**Exceptions:** Complaints that are filed that do not fit the criteria of reportable conduct under this Policy will be forwarded to the appropriate person or department for investigation (i.e., Employee Relations, Human Resources), unless the Chief Legal Officer deems other treatment is necessary.

# Confidentiality

Confidentiality will be maintained to the fullest extent possible. A whistleblower's identity will only be shared in instances where consent is provided or if it is otherwise required by law.

Sunrun, pursuant to the Whistleblower Policy, has a responsibility to protect us, including not disclosing our identity (unless required or permitted by law). Sunrun will also ensure that we are not subject to retaliation. For more information, please reach out to Legal and Compliance.

# Non-retaliation

Retaliation against any person who has, in good faith, made a complaint or reported a concern, or against any person who assists in any investigation or process with respect to such a complaint or concern, is prohibited. If you feel you have been discriminated against, harassed, or retaliated against for submitting a good-faith report, you should immediately report the concern to your supervisor, Sunrun's Chief Legal Officer, or Audit Committee. Any complaints will be promptly investigated. If the complaint is substantiated, appropriate disciplinary action will be taken, up to and including termination of employment for those individuals who engaged in the retaliation.

## Sunrun's commitments

- All concerns raised will be treated fairly and properly.
- Sunrun will not tolerate harassment, victimization, or retaliation in any form of anyone raising a genuine concern.
- Sunrun will make every effort to allow for anonymity and confidentiality.
- Sunrun will ensure that the whistleblower is aware of who is handling the manner.

# Resources

## Contacts

**Legal and Compliance**  
[integrity@sunrun.com](mailto:integrity@sunrun.com)

**Audit Committee**  
[audit@sunrun.com](mailto:audit@sunrun.com)

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855-477-8862  
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San Francisco, CA 94104

## Related policies

For employees, all policies are available on Current

[Code of Business Conduct & Ethics](#)

[Employee Guidebook](#)

[Global Anti-Corruption Policy](#)

[Insider Trading Policy](#)