

SUNRUN

Speak-Up Policy

This Speak-Up Policy ("Policy") describes Sunrun Inc.'s ("Sunrun" or the "Company") standards for reporting and investigating complaints of unethical and/or unlawful conduct. This Policy outlines how Sunrun will support those who speak up so that concerns can be expressed without fear of retaliation, and should be read in conjunction with the Code of Business Conduct & Ethics and other relevant policies.

Sunrun is committed to acting with a high level of ethics and integrity. All accounting, internal accounting controls, auditing, and other legal concerns and complaints received are taken seriously. Sunrun maintains a workplace environment where all employees can raise concerns in good faith free of any harassment, discrimination, or retaliation. Sunrun employees have a professional responsibility to report behavior that goes against company policy or laws and regulations. This is crucial in detecting corrupt, illegal, or other undesirable conduct. Sunrun strongly encourages individuals to speak up if any matters of concern are suspected or witnessed.



What does "speaking up" mean?

For purposes of this policy, "speaking up" means disclosing, reporting, or drawing attention to alleged wrongdoing, misconduct, unethical activity, corruption, or other illegal or undesirable acts that go beyond personal work-related grievances. A concern may be reportable under this Policy even if it initially appears isolated or limited in scope. Examples of such activity include but are not limited to:

- **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;**
- **Falsification, concealment, or inappropriate destruction of corporate or financial records;**
- **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;**
- **Deviation from full and fair reporting of the Company's results or financial condition;**
- **Deficiencies in, or noncompliance with, the Company's internal accounting controls; and**
- **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.**

Distinction Between Corporate-Wide Concerns and Personal Work-Related Grievances

On the other hand, personal work-related grievances are not within the scope of this Speak-Up Policy. "Personal work-related grievances" concern an individual or personal matter that affects the discloser's own employment relationship rather than raising concerns about broader misconduct, unethical activity, or violations of law or Company policy and that does not have implications for the Company as a whole. Personal work-related grievances should be raised with an employee's manager, department head, People Business Partner, Employee Relations, or reported to anyone within Sunrun's Open Door Policy. Examples of personal work-related grievances include:

- **Terms of employment;**
- **Remuneration and performance appraisal;**
- **Allegations of unfair treatment at work;**
- **Bullying and harassment; and**
- **Disagreements among employees or between employees and management.**



Examples of Reportable Conduct:

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 could violate SEC requirements. It could negatively impact the Company, and if not reported, it could impact you.

WHEN TO REPORT

It is important to ensure there are reasonable grounds to suspect conduct is reportable before making a report under this policy. Such reasonable grounds are based on an honest perspective or suspicion and grounded in facts that an incident has occurred or is occurring that could harm employees, customers, or the reputation of the Company.

Reportable conduct should be reported 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.

HOW TO REPORT

Employees 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 of Business Conduct & Ethics, any other company policy, or laws and regulations. Providing as much detail as possible regarding dates, times, places, names, actions or inactions, statements made, or any other evidence are helpful in investigating the allegations.

Non-employees can submit concerns regarding reportable conduct, as defined in the Reporting section, through the mailing address listed below.

Employees can submit concerns regarding reportable conduct through the mechanisms listed below. All reporting mechanisms allow for anonymous submissions, except when a report is received from a Sunrun work email, in which case maintaining anonymity may not be feasible. Such complaints shall be treated confidentially to the extent possible under applicable 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.

Employees should report issues immediately to their manager. If that method is not appropriate, employees 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 & Compliance
integrity@sunrun.com

Audit Committee
audit@sunrun.com

Ethics Hotline
866-602-6613
Sunrun.AllVoices.Co

Mailing Address
Sunrun Inc.
Attn: Chief Legal Officer
600 California Street,
Suite 1800
San Francisco, CA 94108

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 are made without malice or consideration of personal benefit.

CONFIDENTIALITY

Sunrun will maintain the confidentiality of a reporter's identity to the fullest extent practicable, consistent with conducting a thorough investigation and complying with applicable law. Disclosure may occur where (a) the submitter provides consent, (b) disclosure is required by law or legal process, or (c) the Chief Legal Officer determines disclosure is reasonably necessary to conduct the investigation or protect the Company's legitimate interests. Sunrun will use reasonable efforts to notify the reporter before any such disclosure, unless prohibited by law.

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. Anyone who feels discriminated against, harassed, or retaliated against for submitting a good-faith report, should immediately report the concern to their supervisor, Sunrun's Chief Legal Officer, or the 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 individuals who engaged in the retaliation.

Nothing contained in this Policy or the Code of Business Conduct & Ethics limits or otherwise prohibits an employee from communicating with, filing a charge or complaint with, or otherwise participating in any investigation or proceeding with any federal, state, or local governmental agency or commission (e.g., the Securities and Exchange Commission), including providing documents or other information, without notice to the Company.



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 good faith concern; and
- Sunrun will make every effort to allow for anonymity and confidentiality.