

Sunrun is committed to delivering a high level of ethics and integrity. All accounting, internal accounting controls, auditing, and other legal concerns and complaints received are taken seriously.

This Whistleblower Policy ("Policy") describes Sunrun's standards for reporting and investigating whistleblowing complaints. This Policy outlines how Sunrun will support whistleblowers 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.

What is a whistleblower 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, within this Policy.

Whistleblowers can include current or former employees, suppliers, contractors, relatives, dependents, or spouses. Personal work-related grievances do not qualify for protection under whistleblower laws or this Policy. 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.

Differences between whistleblowing concern and grievance

WHISTLEBLOWING CONCERN

The concern is about non-personal matters such as fraud, violations of law regulation or policy, questionable accounting, gross negligence, or intentional errors in internal and reporting controls of the Company or any of its direct and indirect subsidiaries.

Examples:

- Fraudulent accounting practices;
- Threats to health or safety of employees and/or the public;
- Theft, corruption, bribery, kickbacks, or embezzlement;
- Abuse of power; and
- A deliberate attempt to cover up any of the above.

GRIEVANCE

The concern is an individual or personal matter that has implications for the discloser personally and does not have significant implications for the Company as a whole.

Examples:

- 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.



Reporting

WHY REPORT CONCERNS

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 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.

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;
- 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.

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 whistleblower report. 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

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 unless restricted by law.

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.



Complaints received pursuant to this Policy will be documented in the source of record for tracking, accounting, and auditing 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 Anticorruption 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 and People Officer deems appropriate.

All other complaints will be reviewed under the direction and oversight of the Chief Legal and People Officer (or the Chief Financial Officer if the report relates to the Chief Legal and People Officer), who will involve other parties as appropriate.

The Chief Legal and People Officer, or delegate, will provide the Audit Committee with a quarterly report of any accounting and auditing complaints and provide an update on 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.

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.

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 (e.g. Employee Relations, People Team), unless the Chief Legal and People 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.

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 and People 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 SEC), 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.