



Sunnova Energy Corporation
**OUR CODE FOR
CHANNEL PARTNERS**

sunnovaTM



Table of Contents

| | |
|--|----|
| Introduction | 04 |
| Our Values | 05 |
| Business Integrity and Ethical Standards | 06 |
| Human Rights and Labor | 07 |
| Health and Safety | 08 |
| Environmental | 09 |
| Marketing and Sales Practices | 10 |
| Operational Compliance | 11 |
| General Compliance | 12 |
| Reporting Violations | 13 |
| Acknowledgement | 14 |





Introduction

Sunnova and its sales and installation partners, including sales origination-only, installation-only and service-only providers (“Channel Partner”), share the goal of ethical, compliant sales and high-quality solar system installations, which will enable all customers to enjoy the experience of going solar.

Channel Partners are expected to comply with their agreement with Sunnova (“CPA” or “Applicable Agreement”) and with all applicable laws and regulations. In addition to those laws (and other items covered in the Applicable Agreement, but not covered here), this Channel Partner Code of Conduct (or “Code”) explains many of the basic rules that apply to how Sunnova conducts business, and serves as a resource to help ensure that Channel Partner’s actions are representative of our shared expectations and values.

The Code is in no way meant to be an exhaustive list of responsibilities of Channel Partners, possible actions from Sunnova, or inclusive of all Sunnova policies and procedures.

Our Values



The following values underpin the ethical and safe way we work. Channel Partners should also internalize these core values and exemplify them in all they do:

Creative & Analytical Thinking

Creating long-term value requires the effective introduction of economically sound ideas outside of the norm. Partners must utilize their strong capabilities to drive value creation and superior results for shareholders, partners, customers, and employees.

Accountability & Responsibility

Partners must act with urgency, and meet their agreed objectives for Sunnova. Further, Partners must hold themselves and each other accountable and comply with laws, rules, and applicable regulations.

Discipline & Compliance

Excellence requires doing things in a repeatable, sustainable, and lawful manner that eliminates waste and ensures full compliance with procedures and policies. Partners must transparently demonstrate not just their results, but their process of achieving outcomes.

Flexibility

Partners must anticipate and embrace change, with a willingness to modify their views in the face of contrary evidence. They cannot solve problems if they do not accept the evolving realities faced each day.

Technical Knowledge & Judgment

Our vision can be achieved only with employees and partners who are both excellent in their areas of functional accountability and in their application of judgment in selecting techniques and strategies.

Communication, Cooperation & Teamwork

Partners listen, build consensus, and gain the confidence of their colleagues by treating all counterparties with dignity and respect at all times. Partners care about the inclusion and fulfillment of each member of their team.

Business Integrity & Ethical Standards

Operating with the highest ethical standards, including competing fairly for contracts, avoiding any practice which might be construed to be a violation of the letter or spirit of antitrust laws, or violating any law governing the competitive process is paramount.

Channel Partners must only sell, install and/or service solar systems in geographies where they have the technical competence, experience, registrations and licenses. Channel Partners are expected to ensure the safety of their employees and the general public in their endeavors; and treat subcontractors or service providers in an equitable manner.

We expect Channel Partners and their agents to use the highest degree of professional courtesy when dealing with potential customers, existing customers, and competitors. Fair treatment for the customer is our top priority.

To that end, Sunnova will monitor and provide compliance guidance according to Sunnova's Channel Partner Management Program, and will take appropriate disciplinary action for any Channel Partner or agent who fails to treat customers in a fair manner, or breaches the legal and ethical standards in these guidelines as well as the CPA or Applicable Agreement.

Key ethics and compliance issues we expect our Channel Partners to follow:

Bribery, Corruption and Conflicts of Interests

- not giving or accepting illegal payments or engaging in corruptions;
- complying with antitrust and competition laws;
- competing fairly and ethically for all business opportunities;
- avoiding conflicts of interest;
- operating with financial integrity.

Business Records and Confidential Information

- protecting Sunnova's intellectual property and confidential information;
- protecting customers' confidential information;
- only accessing the Channel Partner's own Sunnova web portal – not another Sunnova Channel Partner's web portal;
- refusing to seek additional log-in information for suspended or terminated personnel.

Competition and Sales Practices

- respecting known customer relationships with other Sunnova Channel Partners by refusing to sell Sunnova programs to customers that Channel Partners know have an established Sunnova contract with another Sunnova Channel Partner;
- refusing to advocate that a customer cancel an existing Sunnova contract with another Channel Partner; and
- avoiding the targeted recruitment or solicitation of agents from another Sunnova Channel Partner, not to include general recruitment efforts to which candidates may respond, all of which shall be permitted;
- behaving ethically in contracting with customers;
- implementing robust processes to prevent sales misconduct;
- Requiring agents to comply with this Code and disciplining agents for any misconduct as applicable;
- identifying the Channel Partner as a representative of the Channel Partner (not Sunnova) and accurately describing its relationship to Sunnova.

Human Rights & Labor



Channel Partners will demonstrate a work environment free from discrimination, abuse and harassment, force or coercion, illegal employment, or inhumane treatment.

We expect our Channel Partners to comply with all applicable benefits, leave, wage and hour and other employment laws. Additionally, partners will pay its subcontractors in a timely manner. Additionally, we

expect our Channel Partners to provide a right to remedy for their employees through an accessible, trusted and fair grievance process.

Notwithstanding anything to the contrary, the requirements set forth herein shall only apply to the extent required by applicable law and otherwise shall be at the Channel Partner's discretion.

Health & Safety



We expect our Channel Partners to maintain safe working conditions and a healthy work environment for their workers, including with communication of hazards, preventing occupational injuries by providing appropriate personal protective equipment, establishing processes and programs that drive health and safety, and establishing safe work procedures.

Channel Partners are required to anticipate and be prepared for emergency situations and mitigate

ergonomic risk. We rely on our Channel Partners to conduct a safe installation process. Our policy is that no Sunnova employee may climb ladders or walk on the roof at customers' homes.

Any duty requiring these actions should be performed by our Channel Partners' employees, contractors, or other designees. Channel Partners are expected to assume all risk and liability associated with this action.

Environmental



Channel Partners will strive to reduce the impact of their operations by preventing pollution and waste, conserving natural resources, reducing your environmental footprint, and identifying methods to minimize packaging and shipping materials.

Marketing & Sales Practices

Marketing and Sales Compliance

Channel Partners are expected to understand the potential customer's suitability for solar, including the condition, age and physical integrity of the roof where a solar system is to be installed. No one in the Channel Partner's organization will harass, threaten, or badger customers, or use high-pressure, abusive, deceptive or unfair sales practices. Channel Partner's will not sell to customers who are not suitable under Sunnova's guidelines; nor to any customer who, due to language barriers, health or other evident conditions, is unable to fully understand the terms of the contract.

Channel Partners must comply with Sunnova's policies and compliance guidance materials, including:

- Credit and Underwriting Policy
- Marketing and Customer Communications Policy
- Billing and Collections Policy
- Compliance presentations corresponding to each of the foregoing policies



To access The HUB and the materials above, look for the COMPLIANCE button.

Key Customer Contract Terms

Sales agents must emphasize key terms of the contract to customers, including their right to cancel the contract, the significance of production estimates and guarantees, the effect of any UCC-1 notice filing, net metering benefits (and that neither the contractor nor Sunnova can predict or control a state's net metering policies), the fact that the customer will receive two electric bills after interconnection, moving and transfer of service options, and the customer's options at the end of the contract term.

Door-to-Door Sales

Channel Partners must comply with all door-to-door state and local licensing and permitting requirements, including ensuring that all of their agents secure and carry all required permits while performing sales as well as abstaining from making solicitations at homes displaying a "No Soliciting" sign.

Branding

Sunnova's image is supported by the correct and consistent use of the Sunnova brand. Repetition of brand standards creates familiarity and is the most immediate representation of our Company and our brand. Our brand is a valuable asset that must be used consistently in the proper, approved forms.

Channel Partners must have permission to use Sunnova's brand, submit any Sunnova-branded and/or co-branded materials to Sunnova for approval prior to printing and/or dissemination, and adhere to Sunnova's Brand Guidelines in all materials. Sunnova provides access to a digital "store" called The Hub that offers already-created and legally-approved collateral materials. Using pre-approved materials from The Hub ensures Channel Partners stay within these guidelines.

Channel Partners are expected to remind and train their employees, management and any third-party organization with whom they partner, on applicable laws, including the foregoing marketing, sales and branding practices policies and guidelines.



Operational Compliance

Licensing

Channel Partners are expected to comply with each state and territory regulations governing licensing and permitting required to perform sales, installation, repair and maintenance work of solar systems. Such requirements may include home improvement, contractor, electrical, and solar licenses for the company as well as its agents, in addition to applicable requirements even when the Channel Partner subcontracts the work to a properly-licensed subcontractor.

Channel Partner's advertising or other customer-facing materials must comply with each jurisdictions requirements, including (where applicable) stating the Channel Partner's license number as required (business cards, vehicles, flyers, billboards, etc.), along with other required information, and in the format required by law.

Channel Partners must consult with their legal counsel to ensure they and their sales personnel or vendors have the appropriate license(s) and registration(s), and display credentials properly, in every state or territory in which they operate. Channel Partners must notify Sunnova upon any change in license numbers, name, status, or qualifying agent.



General Compliance

Channel partners will designate one or more of its management staff to be responsible for assessing and monitoring its compliance with this Code of Conduct.

Channel Partners are required to establish internal procedures that support compliance with this Code and review those procedures with its employees that perform any activities in relation to Sunnova's products.

From time to time, Sunnova will ask channel partners to execute certifications of their compliance with the principles in this Code. Failure to promptly return executed certifications is a violation of the Code and may lead to termination of the business relationship with Sunnova.

Sunnova or one of our third-party auditors may conduct announced visits to assess compliance with the Code or to confirm that necessary corrective action has been taken. Refusing to grant auditors access to facilities or workers is a violation of the Code.

Channel partners will develop and maintain internal training, policies and/or codes to ensure that their workers and business partners assisting with Sunnova business understand how to comply with this Code.

Sunnova may periodically require business partners and their workers to attend compliance forums conducted by Sunnova or on Sunnova's behalf. Failure to participate in such trainings upon request is a violation of this Code.



Reporting Violations

Simply put, we expect our Channel Partners to follow the law and the information in this code and to promptly report any actual or suspected violations, including violations by any team member or individual acting on behalf of Sunnova or one of our Channel Partners.



How to Report

- Contact your Sunnova Account Manager
- Contact Sunnova's Hotline at 855.375.6718.
- Send an email to compliance@sunnova.com
- Write to:
Sunnova Energy Corporation
20 E Greenway Plaza, Suite 475
Houston, TX 77046
Attn: Legal and Compliance Team

Channel Partners may choose to remain anonymous if you call the Sunnova Hotline. All reported violations that include specific information will be investigated and appropriate action will be taken.

Acknowledgement

We have received this Code of Conduct and, in addition to our other contractual obligations to Sunnova, hereby agree to comply with it, and to ensure that our subcontractors and vendors engaged in any work related to Sunnova, comply with the principles in this Code. However, to the extent that any term contained herein is inconsistent with the terms of the Applicable Agreement or would create or extend any right or obligation beyond the scope of the Applicable Agreement, it shall be non-binding and void.

Channel Partner: _____

Channel Partner Representative: _____

Signature: _____

Date: _____

