



**Sunnova Energy International, Inc.**  
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September 9, 2022

**Mercy Tochukwu Christopher**

**Jessie Cato**

Business & Human Rights Resource Centre  
2-8 Scrutton Street, 2nd Floor,  
London, EC2A 4RT, UK

Jessie and Mercy,

Thank you for contacting Sunnova regarding the Uyghur Forced Labor Prevention Act (UFLPA) and the actions we are taking to ensure compliance. As you know from our response last year, which we sent you prior to the passage of the UFLPA, we take this matter very seriously. When Sunnova learned of the allegations that forced labor was being used in the solar supply chain in late 2020, Sunnova immediately began taking steps to ensure transparency in our supply chain.

Sunnova is emphatically and unequivocally committed to respecting and defending human rights and has zero tolerance for any form of involuntary labor in any part of its supply chain. This commitment includes complete alignment with the spirit and letter of the law as set forth in the UFLPA (as well as other relevant laws and regulations) with the objective of categorically excluding Uyghur forced labor across our supply chain.

Sunnova does not manufacture the equipment that generates the power we produce, and we do not export or re-export goods to other markets. Instead, we partner with the top companies around the world to install solar systems to deliver the best service to our customers. To enforce compliance with the UFLPA, we work closely with our vendors to ensure they satisfy our Vendor Code of Conduct (the "Code," linked [here](#)), our Human Rights Policy ([here](#)), and our Environmental Policy ([here](#)). Sunnova's Code and Policies mandate that our vendors engage in ethical sourcing of raw materials and components used in the manufacturing of the products that they supply to Sunnova. Specifically, the Code and the Human Rights Policy require that the businesses we work with observe and uphold human rights in the supply chain process and prohibit all forms of forced labor. Sunnova holds its vendors responsible not only for their own operations in this regard, but also for their supply chain: vendors are required to conduct due diligence on their own suppliers to confirm that they do not engage in human rights abuses in the sourcing or manufacturing of raw materials or component parts that are used to produce the goods that are supplied to Sunnova. Sunnova requires each of its vendors sign a certification attesting to its commitment to engage in ethical sourcing, to observe and uphold human rights in the supply chain process, and to follow the Code and policies referenced therein in all transactions with Sunnova.

In addition to these requirements, we also apply rigorous solar chain traceability protocols to ensure those companies adhere to our policies in all of their transactions with Sunnova. To create an added layer of ethical sourcing assurances, we have hired third-party supply chain audit specialists to aid us in our supply chain traceability efforts. The specialists are reviewing our top module suppliers, conducting onsite audits, and helping to provide alternative sources



for raw materials. They also are empowered to help Sunnova terminate relationships with suppliers which do not share our commitment to ethical sourcing.

You have asked whether we are applying a single global standard, aligned with the requirements of the UFLPA, to exclude Uyghur forced labor across our supply chains. Since at present we develop residential solar projects in the United States, all of the imported equipment that we purchase from vendors globally is brought into the United States and is subject to the UFLPA. Nonetheless, we have consistently endeavored to go above and beyond the statutory requirements of the law because it is the right thing to do, and we expect our vendors to conduct business with integrity, honesty, and transparency. We routinely disclose developments and objectives on our supply chain management in our public communications with our stakeholders, including by publication of our Environmental, Social and Governance Report (linked [here](#)).

We appreciate your attention to this matter because we strive to use our business as a powerful force for good, change the way people energize their lives, and help transform the world for the better.

Sincerely,

A handwritten signature in black ink that reads "John J. Berger". The signature is written in a cursive, flowing style.

John Berger  
Chief Executive Officer  
Sunnova Energy International