



ASTRONERGY

正泰新能科技股份有限公司 ESG 政策

ESG Policy Of Chint New Energy Technology Co., Ltd.

归口部门：可持续发展部

Department: Sustainability Department

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1 范围 Scope

本文件规定了正泰新能ESG政策的要求与方法。

This document specifies the requirements and methods for ESG policy of Chint New Energy Technology Co., Ltd..

正泰新能科技股份有限公司 ESG 政策（简称“政策”）适用于正泰新能科技股份有限公司(以下简称“Astronergy”)及各子公司的所有在职员工（包括董事、管理层人员、全职员工、兼职员工、劳务派遣员工等）及本公司在全球直接或间接控制或经营的产业设施。部分政策适用于本公司合作伙伴（包括服务提供商、经销商、供货商、顾问、承包商等）与终端客户。

The ESG policy (the "Policy") of Chint New Energy Technology Co., Ltd. is applicable to all in-service employees of Chint New Energy Technology Co., Ltd. (Hereinafter referred to as "Astronergy") and its subsidiaries (including directors, management personnel, full-time employees, part-time employees, outsourcing labor, etc.) and industrial facilities directly or indirectly controlled or operated by the Company around the world. Some policies apply to our partners (including service providers, dealers, suppliers, consultants, contractors, etc.) and end customers.

2 ESG 承诺 ESG Commitments

我们宣布承诺加入科学碳目标倡议（SBTi）、联合国全球契约组织“加速前进”倡议以及太阳能管理倡议（SSI）、全球环境信息研究中心（CDP）气候变化披露、中国企业气候行动（CCCA）等国际倡议和组织，签署了联合国妇女署《赋权予妇女原则》 Women's Empowerment Principles (WEPs)，积极响应各项与可持续发展相关的全球目标和行动。通过与这些国际组织携手合作，我们期待以更高的标准来规范自身行动，积极参与全球可持续发展进程，为构建一个低碳、绿色、平等、可持续的未来贡献中国企业的智慧与力量。

We commit to joining international initiatives and organizations such as the SBTi, Forward Faster Initiative of United Nations Global Compact, Solar Stewardship Initiative (SSI), the Center for Global Environmental Information and Research Carbon Disclosure Project (CDP) and China Corporate Climate Action (CCCA), and we signed the UN Women's Empowerment Principles (WEPs) to actively respond to global goals and actions related to sustainability. By cooperating with these international organizations, we expect to hold ourselves to a higher standard, actively participate in the global sustainability process, and contribute the wisdom and strength of Chinese enterprises to building a low-carbon, green, equal and sustainable future.

3 ESG 战略方针 ESG Strategic Approach

a) 环境：立足清洁生产，以光能助力零碳未来。

Based on clean production, create a sustainable and net-zero carbon world with solar power

b) 社会：促进体面工作，建立包容和多元的工作环境。



Promote decent work, create an inclusive and diverse workplace

c) 治理：负责任的经营，在价值链创造积极的环境和社会影响。

Responsible operations, create positive environmental and social impacts in the value chain

4 ESG 管理机制 ESG Management Mechanism

4.1 ESG 组织架构 ESG Organizational Structure



ESG管理组织架构 ESG organizational Structure

4.2 ESG 三级职责 ESG 3-Level Responsibilities

治理层：正泰新能董事会为公司可持续发展事宜的最高治理机构，董事会下设战略与可持续发展委员会，并由一位董事担任首席可持续发展官（CSO），负责管理和统筹企业的可持续发展战略、政策与实践，监督战略目标执行与落地，管理ESG风险。

Governance level: The Board of Directors of Astronergy is the highest governance body for sustainability matters. The Board of Directors has set up a strategy and sustainability committee, and one director serves as the Chief Sustainability Officer (CSO), who is responsible for managing and coordinating the enterprise's sustainability strategies, policies and practices, supervising the implementation and realization of strategic objectives, and managing ESG risks.



管理层：公司设立独立的可持续发展部门，作为ESG管理层，执行、监督可持续发展委员会有关决议。部门下设环境治理、社会责任、公司管治三个专项工作组，负责统筹、规划、实施和监督ESG及气候变化相关事宜。

Management level: The Company has set up an independent sustainability department as the ESG management level to implement and supervise the relevant resolutions of the Sustainability Committee. The department has set up three special working groups on environmental governance, social responsibility and corporate regulation for coordinating, planning, implementing and supervising matters related to ESG and climate change.

执行层：开展ESG利益相关方调研和沟通计划，开展ESG报告编制工作，开展并落地ESG战略目标和重点工作计划，定期向管理层汇报ESG重点工作和目标达成情况。

Executive level: Carry out ESG stakeholder research and communication plans, prepare ESG reports, implement ESG strategic objectives and key work plans, and regularly report to the management level on the achievement of key ESG tasks and objectives.

4.3 ESG 管理程序 ESG Management Procedure

a) 汇报机制：执行层根据管理层分解的可持续发展目标和要求，定期向管理层汇报ESG重点工作开展情况和目标达成情况；管理层负责统筹、规划、实施并监督ESG工作，定期向战略与可持续发展委员会汇报ESG重点工作开展情况和目标达成情况。

Reporting mechanism: The executive level shall regularly report to the management level on the implementation of key ESG work and the achievement of ESG objectives according to the sustainability goals and requirements decomposed by the management level; the management level shall coordinate, plan, implement and supervise ESG work, and regularly report to the Strategy and Sustainability Committee on the implementation of key ESG work and the achievement of ESG objectives.

b) 决策机制：治理层基于公司整体可持续发展规划，制定公司可持续发展战略、目标和制度，审议可持续发展相关的重点工作规划，并形成一致决议，监督战略目标执行与落地；管理层负责监督战略与可持续发展委员会有关决议，统筹、监督执行层实施落地。

Decision-making mechanism: The governance level shall, based on the Company's overall sustainability planning, formulate the Company's sustainability strategy, objectives and systems, review key work plans related to sustainability to form unanimous resolutions, and supervise the implementation of strategic objectives; the management level shall supervise the relevant resolutions of the Strategy and Sustainability Committee and coordinate and supervise their implementation by the executive level.

c) 会议机制：战略与可持续发展委员会每年不定期召开ESG相关会议，审阅ESG相关工作；可持续发展部每年不定期召开ESG专题会议，统筹并监督ESG工作事宜。

Meeting mechanism: The Strategy and Sustainability Committee holds ESG related meetings every year to review the ESG work; the Sustainability Department holds ESG sessions every year to



coordinate and supervise the ESG work.

5 ESG 议题管理 ESG Issues Management

5.1 环境政策 Environmental Policy

5.1.1 能源消耗和温室气体排放管理 Energy Consumption & GHG Emission Management

5.1.1.1 定义 Definition

能源消耗指的是在作业和运输过程中的能源消耗，涵盖多种能源形式，包括但不限于电力、燃料以及可再生能源，如化石燃料（例如石油、天然气和煤炭）、可再生能源（如风能、太阳能和水能）以及核能等。

Energy consumption refers to the energy consumption during operations and transportation, covering various forms of energy, including but not limited to electricity, fuel, and renewable energy, such as fossil fuels (such as oil, natural gas, and coal), renewable energy (such as wind, solar, and hydro), and nuclear energy.

温室气体排放指的是温室气体的直接和间接排放，直接温室气体排放是指来自公司拥有或控制的排放源的排放。间接温室气体排放是指由公司活动导致的、但发生在其他公司拥有或控制的排放源的排放。

Greenhouse gas emissions refer to the direct and indirect emissions of greenhouse gases, and direct greenhouse gas emissions refer to emissions from emission sources owned or controlled by companies. Indirect greenhouse gas emissions refer to emissions caused by company activities but occurring from sources owned or controlled by other companies.

5.1.1.2 定性承诺 Qualitative Commitment

正泰新能郑重承诺遵守《联合国气候变化框架公约》及其《京都议定书》和《巴黎协定》以及《蒙特利尔议定书》的相关条款，逐步淘汰消耗臭氧层的物质，采取措施减少温室气体排放。正泰新能始终将“绿色可持续发展”作为企业的长期战略规划，通过加大绿色技术研发投入，不断改进生产工艺，以降低环境负荷和资源消耗。同时，我们积极倡导采用可再生能源，并将节能低碳理念贯穿产品的整个生命周期。

Astronergy solemnly commits to abiding by the relevant provisions of the United Nations Framework Convention on Climate Change, Kyoto Protocol, the Paris Agreement and the Montreal Protocol, phasing out ozone-depleting substances and taking measures to reduce greenhouse gas emissions. Astronergy has always taken "green and sustainable development" as its long-term strategic plan. By increasing investment in green technology research and development, it continuously improves production processes to reduce environmental load and resource consumption. At the same time, we actively advocate the adoption of renewable energy and implement the concept of energy conservation and low carbon throughout the life cycle of products.



我们鼓励员工节约能源, 提倡绿色出行和低碳环保意识, 并在公司内部推动绿色节能理念的实施, 积极响应双碳目标, 为环境保护和可持续发展作出贡献。

We encourage employees to save energy, promote green travel and low-carbon environmental protection awareness, and promote the implementation of green energy conservation concepts within the Company, so as to respond to the goals of carbon peak and carbon neutrality and contribute to environmental protection and sustainability.

5.1.1.3 定量目标 Quantitative Target

短期目标 (至 2028 年) Short-term targets (By 2028)

- a) 可再生能源电力比例达 50%

50% operation electricity is renewable energy

- b) 单位产量碳排放强度减少 30% (以 2022 年为基准年)

30% reduction on unit product carbon emission intensity (taking 2022 as the base year)

- c) 实现 8 家零碳工厂建设

With 8 factories achieving zero carbon emission

中长期目标 (至 2035 年) Mid & Long-term targets (By 2035)

- a) 可再生能源电力比例达 100%

100% operation electricity is renewable energy

- b) 2035 实现运营碳中和, 2050 年实现全价值链碳中和

By 2035, operate in carbon neutrality, by 2050, carbon neutrality across entire value chain

5.1.1.4 审查机制 Review Mechanism

EHS 部每月负责总结各部门的环境绩效情况, 包括统计各受考核部门在当月的电力、天然气等能源的消耗量。这一过程旨在精确评估各部门的能源利用效率, 为制定进一步的节能环保措施提供关键参考, 促进可持续发展和资源有效利用。

The EHS Department is responsible for summarizing the environmental performance of each department every month, including counting the consumption of electricity, natural gas and other energy sources of each assessed department in the current month. This process aims to accurately evaluate the energy utilization efficiency of each department, provide key reference for formulating further energy conservation and environmental protection measures, and promote sustainability and effective use of resources.

每年度, 由 EHS 部对温室气体进行盘查, 各相关部门协助识别及提供相关的活动数据, 并组织第三方认证机构对盘查结果进行外部核查。这一过程旨在监测和控制企业的碳排放, 确保公司的经营活动对环境影响降到最低, 并与可持续发展目标相一致。

Every year, the EHS Department conducts an inventory of greenhouse gases. Relevant departments assist in identifying and providing relevant activity data, and arrange for a third-party



certification authority to carry out external verification of the inventory results. This process aims to monitor and control the carbon emissions of enterprises, so as to ensure that the Company's business activities have a minimum environmental impact and are consistent with sustainability goals.

5.1.2 水资源管理 Water Management

5.1.2.1 定义 Definition

水资源指的是作业过程中的用水量以及排入水体的污染物。

Water consumption during operations. Pollutants rejected into water.

5.1.2.2 定性承诺 Qualitative commitments

正泰新能高度重视水资源管理，在生产运营环节中，采用先进的生产工艺和高效节水设备，不断加大投入研发和创新，优化生产流程，开发新的节水技术和设备，承诺不断提高水资源利用效率，从而有效减少公司运营对当地水资源的负面影响。

Astronergy attaches great importance to water resources management. In the production and operation, it adopts advanced production processes and high-efficiency water-saving equipment, and continuously increases investment in R&D and innovation to optimize production technology and develop new water-saving technologies and equipment, thus improving water resource utilization efficiency and effectively reducing the negative impact of the business activities on local water resources.

5.1.2.3 定量目标 Quantitative Target

短期目标（至 2024 年） Short-term targets (By 2024)

a) 以2022年为基准，实现单位产品耗水强度下降15%

15% reduction on unit product water consumption intensity (taking 2022 as the base year)

中长期目标（至2035年） Mid & Long-term targets (By 2035)

a) 以2022年为基准年,实现单位产品耗水强度下降50%

50% reduction on unit product water consumption intensity (taking 2022 as the base year)

5.1.2.4 审查机制 Review Mechanism

EHS部负责每月汇总各部门环境绩效，包括统计各受考核部门的水资源消耗量，以精确评估各部门的水资源利用效率。此举旨在为制定进一步的节水措施提供重要参考，确保公司水资源使用始终符合环境保护和可持续发展目标。

The EHS Department is responsible for summarizing the environmental performance of each department every month, including counting the water consumption of each assessed department, so as to accurately evaluate the utilization efficiency of water resources in each department. The purpose is to



provide important references for formulating further water conservation measures and ensure that the Company's use of water resources always meets environmental protection and sustainability goals.

5.1.3 原料、化学品、废弃物管理 Materials, Chemicals & Waste Management

5.1.3.1 定义 Definition

原料，即在生产运营过程中使用的各类原材料。

Materials, consumption of all types of raw materials.

化学品，即在生产运营过程中，各类化学品的消耗。

Chemicals, consumption of all types of chemicals.

废弃物指作业产生的无害和有害废弃物，还包括温室气体以外的气体排放（例如 SO_x、NO_x）。

Waste, non-hazardous and hazardous waste generated from operations. Also includes air emissions other than GHG (e.g. SO_x, NO_x).

5.1.3.2 定性承诺 Qualitative Commitments

正泰新能已建立符合绿色供应链标准的采购和生产体系，承诺不使用冲突矿产，严格把控原材料选用，确保产品的原材料来源合法合规。我们郑重承诺化学品管理活动符合国家和行业法律法规的要求，积极推动绿色化学品的使用和环保技术的应用，以低毒、无毒化学品代替高毒化学品。通过优化化学品使用和管理，减少化学品的浪费和消耗。我们承诺持续改进化学品管理体系，不断提高化学品管理水平和效率，预防化学品事故的发生，逐步实现化学品管理的可持续发展目标。

Astronergy has established a procurement and production system in line with green supply chain standards. We commit to not using conflict minerals, strictly controlling the selection of raw materials, and ensuring that the sources of raw materials for products are legal and compliant. We solemnly commit that our chemical management activities conform to the requirements of national and industrial laws and regulations. We actively promote the use of green chemicals and the application of environmental protection technologies, and replace highly toxic chemicals with low-toxicity and non-toxic chemicals. We reduce waste and consumption of chemicals by optimizing chemical use and management. We commit to continuously improving the chemicals management system, constantly enhancing the level and efficiency of chemicals management, preventing chemical accidents, and gradually realizing the sustainability goal of chemicals management.

正泰新能承诺遵守国家 and 地方废弃物管理法律法规，通过优化生产工艺和技术，减少废弃物的排放和产生，根据废弃物的性质和特点采取相应的处理方法。我们承诺采取安全可靠的废弃物处理方式，开发和应用废弃物资源化技术，将废弃物转化为资源，实现资源的循环利用和再利用，积极推动绿色废物处理技术的应用。

Astronergy commits to abiding by national and local laws and regulations on waste management, reducing the discharge and generation of waste by optimizing production processes and technology, and adopting corresponding treatment methods according to the nature and characteristics of waste. We



commit to adopting safe and reliable waste disposal methods, developing and applying waste recycling technologies, transforming waste into resources, realizing the recycling and reuse of resources, and actively promoting the application of green waste disposal technology.

正泰新能承诺严格遵守与企业运行密切相关的重要国际环境公约，例如《关于控制危险废物越境转移及其处置的巴塞尔公约》、《关于汞的水俣公约》、《持久性有机污染物的斯德哥尔摩公约》、《关于海上危险货物的国际公约》、《关于在国际贸易中对某些危险化学品和农药采用事先知情同意程序的鹿特丹公约》以及《生物多样性公约》等。正泰新能采用可持续的资源管理和利用方式，旨在减少环境污染、保护生态系统和促进可持续发展。

Astronergy commits to strictly abiding by important international environmental conventions closely related to enterprise operation, such as the *Basel Convention on the Control of Trans-boundary Movements of Hazardous Wastes and Their Disposal*, the *Minamata Convention on Mercury*, the *Stockholm Convention on Persistent Organic Pollutants*, the *International Convention on Maritime Dangerous Goods*, *Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade* and the *Convention on Biological Diversity*. Astronergy adopts sustainable resource management and utilization methods to reduce environmental pollution, protect the ecosystem and promote sustainability.

正泰新能建立健全化学品管理制度和安全操作规程，规范化学品的采购、储存、使用和处置流程。制定健全的化学品事故应急预案，定期组织化学品事故应急演练，定期开展化学品风险评估，确保零化学品泄漏事故发生。为了实现废弃物零填埋的目标，我们将采取多种措施实现废弃物的再利用、回收和资源化利用。通过生产过程优化、废弃物分类处理，建立健全废弃物管理体系，加强对废弃物处理过程的监测和评估，为环境保护和可持续发展做出积极贡献。

Astronergy establishes and improves the chemical management system and safe operating procedures to standardize the procurement, storage, use and disposal of chemicals. Astronergy formulates a sound emergency response plan for chemical accidents, regularly organizes emergency drills for chemical accidents, and regularly carries out risk assessments of chemicals to ensure zero chemical leakage accidents. In order to achieve the goal of "Zero Waste to Landfill", we will take various measures to realize reuse, recycling and resource utilization of waste. Through production process optimization and waste classification, we establish a sound waste management system, strengthen the monitoring and evaluation of the waste disposal process, and make positive contributions to environmental protection and sustainability.

5.1.3.3 定量目标 Quantitative Target

短期目标（至 2028 年）Short-term targets (By 2028)

a) 实现废弃物零填埋

Zero landfill waste



5.1.3.4 审查机制 Review Mechanism

EHS 部负责对接触化学品的员工进行暴露评估和健康评估，定期对危险化学品仓库和设施进行安全评估，对现场危险化学品存储和使用进行检查。并和有关部门就发现的问题进行联系，提供技术帮助解决问题。此外，指定专人负责每月度综合汇总各基地电池车间的化学品消耗情况，结合各车间的产量数据，计算各基地电池车间单位产量化学品消耗量。这一过程旨在精确评估各基地电池车间的化学品利用效率，督促各基地不断优化工艺流程，减少各类化学品的使用量，确保无化学品事故发生。

The EHS Department is responsible for exposure assessment and health assessment of employees exposed to chemicals, regular safety assessment of hazardous chemical warehouses and facilities, inspection of the storage and use of hazardous chemicals on site, contact with relevant departments on the problems found, and provision of technical assistance to solve them. In addition, the Department shall designate a special person to be responsible for comprehensively summarizing the chemical consumption of battery workshops at each base every month, and calculating the chemical consumption per unit output of battery workshops at each base in combination with the output data of each workshop. The purpose of this process is to accurately evaluate the chemical utilization efficiency in the battery workshop of each base, urge each base to continuously optimize the process flow, reduce the use amount of various chemicals and ensure no chemical accidents.

EHS 部指定专人负责每月度汇总各基地废弃物处置情况，以便核查。EHS 部定期或不定期核查厂内废弃物分类、储存、转运台账及最终处置状况。若有废弃物贮存、转运清单记录等不合规状况，应及时按要求整改。将检查和观察到的不符合项记录，同时落实整改项。

The EHS Department shall designate a special person to summarize the waste disposal of each base every month for verification. The EHS Department shall regularly or irregularly check the classification, storage, transfer ledger and final disposal of waste in the factory. In case of any non-conformance in waste storage, transfer list records, etc., timely rectification shall be carried out as required. The non-conformance items inspected and observed shall be recorded and rectified.

5.1.4 产品使用管理 Product Use Management

5.1.4.1 定义 Definition

直接使用产品对环境产生的影响，包括产品在使用过程中对能源、水资源、材料和化学品的消耗等。

Environmental impacts generated from the direct use of products. Can include energy, water, materials and chemicals use.



5.1.4.2 定性承诺 Qualitative Commitments

正泰新能承诺遵循绿色环保可持续的理念，通过绿色设计，致力于打造低碳、环保、健康、安全的产品，通过围绕产品的使用需求及应用场景，采用高性能长寿命低污染可回收利用的原材料，使用高机械强度的结构设计等，以延长产品寿命、提高光电转化效率、增强抗积灰自清洁等特性，尽可能地降低产品在使用过程中对能源、水资源、材料、化学品和有害物质的消耗，从而最大限度地减轻产品对环境的负面影响。

Astronergy is committed to following the concept of green environmental protection and sustainability, and strives to create low-carbon, environmentally friendly, healthy and safe products through green design. By focusing on the use requirements and application scenarios of the products, adopting high-performance, long-service life, low-pollution and recyclable raw materials, and utilizing structural designs with high mechanical strength, etc., Astronergy is aiming to prolong the life of the products, increase the efficiency of the photoelectric conversion efficiency, and enhance the characteristics of the ash deposition resistance and self-cleaning features to minimize the consumption of energy, water resources, materials, chemicals and harmful substances during the use of products, also the negative impact of the products on the environment.

5.1.4.3 定量目标 Quantitative Target

短期目标（至 2024 年） Short-term targets (By 2024)

- a) 实现产品光电转化效率提升 1%以上 (以 2022 年为基准年)

More than 1% increase in cell efficiency (taking 2022 as the base year)

- b) 单位装机容量下，对土地及建筑物屋顶等安装场地的需求面积降低 1%以上 (以 2022 年为基准年)

Reduction of more than 1% in the area required for installation sites, such as land and building roofs, per unit of installed capacity (taking 2022 as the base year)

- b) 使用过程中综合运维能耗及水资源消耗降低 2%以上(以 2022 年为基准年)

Reduction of more than 2% in integrated operation and maintenance energy and water consumption during use

中长期目标（至 2035 年） Mid & Long-term targets (By 2035)

- a) 实现产品光电转化效率提升 3%以上 (以 2022 年为基准年)

More than 3% increase in cell efficiency

- b) 单位装机容量下，对土地及建筑物屋顶等安装场地的需求面积降低 3%以上(以 2022 年为基准年)

Reduction of more than 3% in the area required for installation sites, such as land and building roofs, per unit of installed capacity

- c) 单使用过程中综合运维能耗及水资源消耗降低 5%以上(以 2022 年为基准年)

Reduction of more than 5% in integrated operation and maintenance energy and water consumption during use



5.1.4.4 审查机制 Review Mechanism

技术研究院负责产品开发战略及技术路线的研判，对产品使用过程中能源、水资源、材料及化学品等各项消耗数据进行动态收集分析，建立产品参数指标与上述数据的关联，开展产品的设计变更及新技术新材料开发等，实现产品性能指标的提升。同时，结合产品管理调研的产品使用情况行业数据，取优补短，为降低客户产品使用过程中的消耗，建立持续的优选方案。

The Technology Research Institute is responsible for studying and judging the product development strategy and technical route, dynamically collecting and analyzing the consumption data of energy, water resources, materials and chemicals during the use of products, establishing the correlation between product parameter indicators and the above data, carrying out product design changes and the development of new technologies and new materials, etc., so as to improve product performance indicators. At the same time, in combination with the industry data of product usage investigated by Product Management, the Technology Research Institute will learn from the best to make up for weaknesses, and establish a continuous optimization scheme to help customers reduce the consumption of products during use.

5.1.5 产品生命末期管理 Product End-of-Life Management

5.1.5.1 定义 Definition

产品寿命结束时对环境产生的直接影响。这些影响可包括产生的有害、无害废物、排放和意外污染。

Direct Environmental impacts generated from the end-of-life of the products. These impacts can include hazardous, non-hazardous waste generated, emissions and accidental pollution.

正泰新能关注光伏组件产品生命末期进行回收和处理，将废弃物或废弃材料重新处理、再加工或重新利用，以减少资源浪费和环境污染，提高资源利用效率。

Astronergy focuses on solar module products which recycled and treated at the end of their lifespan, reprocessing, or reusing waste or materials to reduce resource waste and environmental pollution, and improve resource utilization efficiency.

5.1.5.2 定性承诺 Qualitative Commitments

正泰新能在产品设计开发时已将产品的可回收性和可重复利用性作为重要考量点，采用环保材料以降低氟、肟等有害污染物排放，实现产品制造过程的绿色低碳环保，并降低产品回收过程中对于水资源、土地资源等的污染。公司目前已与国际知名回收服务商PVCYCLE等达成战略合作，实现产品生命末期的闭环管理。作为中国光伏行业协会光伏组件回收工作组的重要成员，正泰新能承诺将联合多方组织积极推动光伏组件产品的回收与可循环利用，助力光伏产业的绿色低碳发展。

Astronergy has focused on the recyclability and reusability of products in product design and development, and adopted environment-friendly materials to reduce the emission of harmful pollutants

such as fluorine and oxime, so as to realize green, low-carbon and environmentally friendly manufacturing of products and reduce pollution to water resources and land resources during product recycling. At present, Astronergy has reached strategic cooperation with internationally renowned recycling service providers such as PVCYCLE to realize closed-loop management of products at the end of their life cycles. As an important member of the Photovoltaic Module Recycling Working Group of China Photovoltaic Industry Association, Astronergy commits to working with multiple organizations to actively promote the recycling and recyclability of photovoltaic module products and help the green and low-carbon development of the photovoltaic industry.

5.1.5.3 定量目标 Quantitative Target

短期目标（至 2029 年）Short-term targets (By 2029)

- a) 计划 5 年内建立绿色回收实验室，为回收技术开发提供研究平台支撑。

We plan to establish a green recycling laboratory within 5 years to provide research platform for the development of recycling technology

中长期目标（至 2035 年）Mid & Long-term targets (By 2035)

- a) 产品回收率达到 90%

90% product recycling rate

- b) 80%的产品原料将来自回收材料

80% raw materials from product recycling

5.1.5.4 审查机制 Review Mechanism

技术研究院负责对产品回收相关信息和数据记录，依据战略合作协议在固定周期内动态监控产品回收率。同时，技术研究院主导产品回收专项小组，负责产品回收体系建设，完善产品回收的制度文件，开展产品回收技术标准、技术规范、操作指南等研究开发，定期监控产品回收效果，并进行持续改进工作。

The Technology Research Institute shall be responsible for recording information and data related to product recycling, and dynamically monitoring the recycling rate of products within a fixed period according to the strategic cooperation agreement. At the same time, the Technology Research Institute shall lead a special product recycling team to be responsible for building the product recycling system, improving the system documents of product recycling, carrying out research and development on technical standards, technical specifications and operation guidelines of product recycling, regularly monitoring the product recycling effect and making continuous improvement.



5.1.6 生物多样性管理 Biodiversity Management

5.1.6.1 定义 Definition

生物多样性是生物（动物、植物、微生物）与环境形成的生态复合体以及与此相关的各种生态过程的总和。

Biodiversity is the sum total of ecological complex formed by organisms (animals, plants and microorganisms) and environment as well as various related ecological processes.

5.1.6.2 定性承诺 Qualitative Commitments

正泰新能遵守联合国《生物多样性公约》等国际公约及《中国生物多样性保护》、《中华人民共和国环境保护法》《中华人民共和国野生动物保护法》、《中华人民共和国森林法》、《中华人民共和国野生植物保护条例》等运营所在辖区的生态政策，将生物多样性保护纳入公司长期可持续发展规划中。正泰新能致力于不断拓展“光伏+”应用方案，将高效光伏方案与农业、荒漠治理等相结合，尽量降低业务营运对生物多样性和生态系统的不利影响，扩大有利影响，促进社会与自然和谐共生。同时建议并鼓励上下游合作伙伴遵守生物多样性保护相关条例并践行生物多样性保护。

Astronergy complies with international conventions such as the UN Convention on Biological Diversity and ecological policies in areas where it operates, including *Biodiversity Conservation in China, Environmental Protection Law of the People's Republic of China, Wild Animal Conservation Law of the People's Republic of China, Forest Law of the People's Republic of China and Regulations of the People's Republic of China on Wild Plants Protection*, and incorporates biodiversity conservation into its long-term sustainability plan. Astronergy is committed to continuously expanding "PV+" application solutions, combining high-efficiency PV solutions with agriculture and desert control, minimizing the adverse effects of business operations on biodiversity and ecosystems, expanding their beneficial effects, and promoting harmonious coexistence between society and nature. At the same time, it advises and encourages upstream and downstream partners to abide by relevant regulations on biodiversity conservation and practice biodiversity conservation.

我们致力于在进行开发或建设项目时、相关经营生产活动对生物多样性产生净零损失。如果公司在开发或建设项目过程中产生任何对生物多样性的负面影响，要求在项目建成后 2 年内采取可信度高的生物多样性补偿措施，通过在其他地区或项目中实施生物多样性保护、恢复等措施，来平衡或抵消由开发活动引起的负面生态影响。

We are committed to net zero loss of biodiversity in related operation and production activities during project development or construction. If the Company has resulted in any negative impact on biodiversity during the development or construction of projects, it is required to take high credible biodiversity compensation measures within 2 years after the completion of the projects, and implement biodiversity conservation and restoration measures in other areas or projects to



balance or offset the negative ecological impacts caused by the development activities.

我们承诺公司在进行开发或建设项目时、相关经营生产活动不涉及任何破坏森林的行为，包括砍伐、烧毁或清除森林，以确保森林生态系统的完整性和可持续性。

We commit that when the Company carries out development or construction projects, related operation and production activities will not involve any behavior of destroying forests, including deforestation, burning or clearing forests, so as to ensure the integrity and sustainability of the forest ecosystem.

我们承诺不在世界自然遗产地或其缓冲区内开展经营生产相关活动。

We commit not to carrying out operation and production related activities in any world natural heritage site or its buffer zones.

我们承诺遵守生态保护区及其他因其生物多样性重要性而指定的区域的任何规章、公约及法律要求、管理目标。

We commit to complying with any regulatory, convention, legal requirements and management objectives of ecological protected areas and other areas designated for their biodiversity importance.

5.1.6.3 定量目标 Quantitative Target

a) 每年利用国际生物多样性日、世界环境日等重要主题纪念日，开展至少 1 场生物多样性科普宣传活动，提升生物多样性保护意识。

We commit to carry out at least one science popularization publicity activity for biodiversity to raise awareness of biodiversity conservation on important theme commemoration days such as International Biodiversity Day and World Environment Day every year.

5.1.6.4 审查机制 Review Mechanism

根据正泰新能《EHS考核管理制度》相关条款的规定，EHS部定期评估公司各部门及相关方的生物多样性保护政策，深入关注各种行为对当地生物多样性可能造成的不利影响，并采取措施加以控制和改善。EHS部通过分析实际情况，对责任部门及责任人进行严格考核，并在环境绩效中体现相关考核记录，以确保所有行动符合生物多样性保护的要求。

According to the relevant provisions of EHS Assessment Management System of Astronergy, the EHS Department regularly assesses the biodiversity conservation policies of various departments and related parties of the Company, pays in-depth attention to the possible adverse effects of various behaviors on local biodiversity, and takes measures for control and improvement. The EHS Department strictly assesses the responsible departments and persons by analyzing the actual situation, and reflects relevant assessment records in environmental performance to ensure that all actions meet the requirements of biodiversity conservation.



5.1.7 顾客健康与安全 Customer Health & Safety

5.1.7.1 定义 Definition

产品和服务对客户或消费者的负面健康与安全影响。

Negative health and safety impacts of products and services on customers or consumers.

5.1.7.2 定性承诺 Qualitative Commitments

正泰新能持续构建并强化企业质量文化，承诺并确保产品品质的卓越与稳定。公司将质量管理视为企业生存发展的生命线，全面融入战略发展规划中，力求用极致的品质追求，赢得市场的广泛认可与赞誉。严格遵守国家及国际上有关光伏产品安全和性能的标准和要求，确保产品不会对客户或消费者健康与安全产生负面影响。公司为客户提供详细的产品安全信息和使用说明，确保客户或消费者在使用光伏产品时完全了解如何安全安装、操作，避免潜在伤害。公司提供完善的售后服务和技术支持，确保产品安全性能得到持续监控。对于客户反馈存在安全隐患或质量原因等缺陷的组件，进行排查，必要时参照《全球组件制造产品召回管理规范》对组件进行召回处理，确保将对客户造成的不良影响或伤害降至最低限度。

Astronergy constantly builds and strengthens its corporate quality culture for excellence and stability of its products. We regard quality management as the lifeline for corporate survival and development by comprehensively integrating it into strategic development planning, aiming to win market recognition with our pursuit of ultimate quality. The company strictly comply with national and international standards and requirements for the safety and performance of photovoltaic products, ensuring that products do not pose any potential risks to the health and safety of customers or consumers during the design and production process. The company provides customers with detailed product safety information and usage instructions to ensure that customers or consumers fully understand how to install and operate photovoltaic products safely and avoid potential harm when using them. The company provides comprehensive after-sales service and technical support to ensure continuous monitoring of product safety performance. As for modules with safety hazards or quality issues reported by customers, we conduct investigation, if necessary, refer to the *Global Component Manufacturing Product Recall Management Specification* to recall the modules and ensure that any negative effects or injuries caused to customers are minimized.

5.1.7.3 定量目标 Quantitative Target

短期目标（至 2024 年） Short-term targets (By 2024)

a) 0 重大质量安全事故

Zero major quality and safety accidents

b) 100% 质量风险事件理累计闭环率



100% Cumulative closed loop rate of major quality risk events

c) 100% 产品监督抽查通过率

100% Product supervision and sampling inspection pass rate

5.1.7.4 审查机制 Review Mechanism

质量管理部每月统计产品质量异常以及涉及客户的健康安全事件，建立数据库，并组织专项会议，针对重大事件推动内部快速分析及改善，外部快速解决。通过现场交付宣贯，讲解产品正确安装使用，杜绝过程导致人身危害的隐患。质量管理部结合客户使用体验，反馈并推动内部对产品进行优化，为客户提供更佳优质的产品和服务。

The Quality Management Department conducts monthly statistics on product quality anomalies, health and safety incidents involving customers, establishes a database, and organizes meetings to promote rapid analysis and improvement for major events, and external rapid resolution. Through on-site delivery promotion, explain the correct installation and use of the product to eliminate the potential dangers of personal harm. Based on customers' experience, the Quality Management Department send feedback and drive internal optimization of products to provide customers with better quality products and services.

5.2 劳工与人权政策 Labor And Human Rights Policy

正泰新能科技股份有限公司（以下简称“正泰新能”或“公司”）郑重承诺遵守《世界人权宣言》、《国际劳工组织公约》、《联合国工商业与人权指导原则》、《经济合作与发展组织跨国企业准则》、SA8000社会责任管理体系标准等国际倡议、国际标准要求，劳动定额标准以及中国法律的标准，尊重并保护在公司控制和影响范围内的所有员工，包括公司自己及其供应商/分包商的生产或服务人员等。这是一个负责任公司所具备的基本条件，也是消费者、客户、公众和政府等利益相关方的期望。

Chint New Energy Technology Co., Ltd. solemnly commits to abiding by the requirements of international initiatives and standards, including the Universal Declaration of Human Rights, the Conventions of the International Labour Organization, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the SA8000 Social Accountability Management System Standard., labor quota standard and laws of China, to respect and protect all employees within the Company's control and influence, including production or service personnel employed by the Company itself and by its suppliers/sub-contractors. This is an essential condition for a responsible company and the expectation of stakeholders such as consumers, clients, the public and governments.

正泰新能始终坚守“以人为本，服务社会。健康安全，人人有责”的社会责任管理方针，全方位践行企业社会责任。

Astronergy consistently adheres to the social responsibility management policy of "People-Oriented, Serving Society. Health and Safety, Everyone's Responsibility," and



comprehensively implements corporate social responsibility in all aspects.

5.2.1 社会责任方针 Social Responsibility Management Policy

以人为本：员工是公司运作的基石，本公司会一直致力于对员工人权的持续保护，遵守国家相关的法律法规，为员工营造舒适安全的工作环境，从制度层面保障员工的个人权益不受侵犯。

People-Oriented: employees are the cornerstone of the company's operations. We are committed to the continuous protection of employees' human rights, compliance with relevant national laws and regulations, creating a comfortable and safe working environment for employees, and safeguarding their personal rights and interests from infringement at the institutional level.

服务社会：为社会提供优质服务是公司生存发展的强大动力，我们会不断的为社会创造价值，承担更多的社会责任，并利用自身影响力，与相关方共同提高社会责任绩效。

Serving Society: providing high-quality services to society is a powerful driving force for the company's survival and development. We will continuously create value for society, take on more social responsibilities, and use our influence to jointly improve social responsibility performance with stakeholders.

健康安全：员工的健康安全是公司管理的底线，公司会时刻将员工的健康安全放在首位，制定管理政策、程序，时刻监督，以保障公司员工的健康安全。

Health and Safety: The health and safety of employees are the bottom line of the company's management. The company will always prioritize the health and safety of employees, formulate management policies and procedures, and monitor them at all times to ensure the health and safety of our employees.

人人有责：做好社会责任管理体系需要公司领导层与员工们的共同努力，社会责任政策的制定与实施离不开领导层的以身作则，员工们的尽职尽责。只有公司上下共同尽责，才能持续改善社会责任绩效。

Everyone's Responsibility: Building a good social responsibility management system requires the joint efforts of the company's leadership and employees. The formulation and implementation of social responsibility policies cannot be separated from the leadership's leading by example and the employees' dedication to their duties. Only when the entire company fulfills its responsibilities together can we continuously improve social responsibility performance.

5.2.2 员工健康与安全管理 Employee Health & Safety Management

5.2.2.1 定义 Definition

处理员工在工作中（即在作业和运输过程中）遇到的健康与安全问题，包括由危险设备、工作方法和有害物质等引起的生理和心理问题。

Deals with health and safety issues encountered by employees at work i.e. during operations and transport. Includes both physiological and psychological issues arising from, among others, dangerous



equipment, work practices and hazardous substance.

5.2.2.2 定性承诺 Qualitative Commitments

正泰新能承诺严格遵守劳动安全、职业健康相关的国家和地方法律法规，致力于营造健康、安全的工作环境，保障员工的合法权益。免费为员工提供必要的安全培训教育,安全设施和装备，帮助员工了解工作中的安全风险和应对措施。

Astronergy commits to strictly abiding by national and local laws and regulations related to labor safety and occupational health, and is committed to creating a healthy and safe working environment and protecting the legitimate rights and interests of employees. Astronergy commits to providing necessary safety training and education, safety facilities and equipment for employees free of charge, to help them understand the safety risks in their work and countermeasures.

正泰新能将采取措施最大限度消除或降低危害，为员工提供一个安全的、良好的工作和生活环境：所有的车间、仓库、写字楼、员工宿舍等建筑物均符合所在国家或地方标准，通过建筑质量、消防、环保验收；各车间工序没有产生过量粉尘、噪声、水分、烟雾，造成高温，严重污染空气的作业；各工序均按国家规定配置了安全保护设施，劳动保护用品；正泰新能定期按照国家或地方相关规定进行三废排放检测、消防设施检测、防雷设施检测、员工饮用水进行检测等，以保证员工们的健康。任何将其他员工置于不安全的工作环境中的员工将被立即解雇。

Astronergy takes measures to eliminate or reduce hazards to the maximum extent and provide employees with a safe and good working and living environment: All workshops, warehouses, office buildings, employees dormitories and other buildings meet the standards of the country or place where they are located and pass the acceptance of construction quality, fire protection and environmental protection; Each workshop process does not produce excessive dust, noise, moisture or smoke, nor results in high temperatures and serious air pollution operations; Each process is equipped with safety protection facilities and labor protection articles according to national regulations; Astronergy regularly tests the discharge of three wastes, fire fighting facilities, lightning protection facilities and drinking water for employees in accordance with relevant national or local regulations to ensure the health of employees. Any employee who places other employees in an unsafe working environment will be immediately dismissed.

公司承诺建立健全的安全监管和管理体系，加强对安全、健康风险的监测和管理，及时发现和解决安全、健康隐患，不断改善生产工作与生活条件，确保员工的健康安全。

Astronergy commits to establish a sound safety supervision and management system, strengthen the monitoring and management of safety and health risks, discover and solve potential safety and health hazards in time, and continuously improve production, working and living conditions, so as to ensure the health and safety of employees.



5.2.2.3 定量目标 Quantitative Target

短期目标（2024 年）Short-term targets (By 2024)

a) Zero fatal accidents, 0.25‰ or lower - incidence rate in major-injury accidents, 1.8‰ or lower - incidence rate in minor-injury accidents

杜绝死亡事故，千人重伤事故率 $\leq 0.25\text{‰}$ ，千人轻伤事故率 $\leq 1.8\text{‰}$

b) B 级事件 ≤ 2 起、C 级事件 ≤ 4 起、D 级事件 ≤ 8 起、E 级事件 ≤ 15 起

Level B incidents ≤ 2 , Level C incidents ≤ 4 , Level D incidents ≤ 8 , Level E incidents ≤ 15

c) 重大安全隐患整改率 100%，专项检查执行率 100%，岗位培训合格率 $\geq 95\%$ ，杜绝职业病和集体中毒事件的发生

100% rectification rate of major safety hazards, 100% execution rate of special inspections, qualification rate of job training $\geq 95\%$, 0 occurrence of occupational diseases and collective poisoning incidents

5.2.2.4 审查机制 Review Mechanism

根据正泰新能《EHS 目标指标与方案管理制度》与《EHS 考核管理制度》，EHS 部每年初对目标指标进行详细分解，逐级制定每年的 EHS 目标责任书，并将其分配给各部门进行签订，确保公司全员完成 EHS 目标责任书的签订。

According to the *EHS Target Indicators and Scheme Management System* and the *EHS Assessment Management System* of Astronergy, the EHS Department decomposes the target indicators in detail at the beginning of each year, formulates the annual EHS target responsibility statement level by level, and distributes it to all departments for signing, so as to ensure that all employees of the Company complete the signing of the EHS objective responsibility statement.

EHS 部每月度对各类事故进行监控，并公布各部门的安全绩效。每季度还将进行一次绩效考核，以评估各部门的安全表现。这一举措有助于确保公司的环境、健康与安全工作得到有效的执行与监督，以保障员工和环境的安全与健康。

The EHS Department monitors various accidents every month and publishes the safety performance of each department. It also conducts one performance appraisal every quarter to assess the safety performance of each department. This initiative helps to ensure that the Company's environmental, health and safety work is effectively implemented and monitored to protect the safety and health of employees and the environment.

5.2.3 工作条件 Working Conditions

5.2.3.1 定义 Definition

工作条件：处理雇员的工作时间、薪酬和社会福利问题。

Deals with working hours, remunerations and social benefits granted to employees.

5.2.3.2 定性承诺 Qualitative Commitments

正泰新能科技股份有限公司承诺遵守所有与常规工作时间、加班时间和福利相关的适用法律，为员工提供平等的就业机会和待遇，合理安排生产计划，保障员工法定休息时间，适时安排工人的工作时间和休息、休假。公司坚持男女同工同酬，遵守所在国家和/或地方劳动法律规定的正常工资和加班工资，按法律要求与员工签订劳动合同，定期提供合理、合法的工资福利，至少满足工人的基本生活需求，并按要求支付加班费及奖金。公司将确保每月发放一次工资，除非所在国家和/或地方法律规定的工资发放周期更短。公司禁止以纪律措施或任何其他原因为由扣留工资

Astronergy commits to abide by all applicable laws related to regular working hours, overtime and welfare, provide employees with equal employment opportunities and treatment, reasonably arrange production plans, ensure the legal rest time of employees, and timely arrange workers for their working hours, rest and vacation. The Company insists on the policy of equal pay for equal work between men and women, abides by the provisions on normal salary and overtime wage stipulated in the labor laws of the country and/or place where it is located, signs labor contracts with employees according to legal requirements, regularly provides reasonable and legitimate wages and benefits to cover at least the basic living needs of workers, and pays overtime pay and bonuses as required. The Company ensures that the salary is paid monthly, unless a shorter period for salary payment is stipulated in the laws of the country and/or place where it is located. The Company prohibits withholding of salaries on the ground of disciplinary measures or for any other reason.

5.2.3.3 定量目标 Quantitative Target

短期目标（至 2028 年）Short-term targets (By 2028)

- a) 员工满意度得分 ≥ 85 分
85 or higher - Employee satisfaction score
- b) 保持每年技术人才流失率 15% 以下
15% or lower - Technical talent turnover rate per year

5.2.3.4 审查机制 Review mechanism

- a) 风险识别 Risk identification
 - 1) 遵照法律法规，识别各工厂所在地工作条件风险；
Identify the risks to working conditions at each plant location in accordance with laws and regulations;
 - 2) 识别供应链各利益相关方面临的工作条件风险；
Identify the risks to working conditions faced by various stakeholders in the supply chain;
- b) 管理举措 Management measures



1) 建立完善员工沟通与申诉机制，设立实名、匿名投诉建议渠道，定期开展员工访谈，同时保护员工隐私，确保员工不会因此受到报复与区别对待；

Establish and improve the employee communication and appeal mechanism, set up real-name and anonymous complaint and suggestion channels, conduct regular interviews with employees, and protect employees' privacy at the same time, so as to ensure that employees will not be retaliated and treated differently;

2) 设立专案解决员工反馈的问题；

Set up special cases to solve the problems fed back by employees;

c) 监督检查 Supervision and inspection

1) 建立完善员工沟通与申诉机制，设立实名、匿名投诉建议渠道，定期开展员工访谈，同时保护员工隐私，确保员工不会因此受到报复与区别对待；

Establish and improve the employee communication and appeal mechanism, set up real-name and anonymous complaint and suggestion channels, conduct regular interviews with employees, and protect employees' privacy at the same time, so as to ensure that employees will not be retaliated and treated differently;

2) 设立专案解决员工反馈的问题；

Set up special cases to solve the problems fed back by employees;

d) 持续改进 Continuous improvement

开展员工满意度与敬业度调查，出具调查报告，持续优化劳工人权保障体系。

Carry out employee satisfaction and engagement surveys, issue survey reports, and continuously optimize the labor human rights protection system.

5.2.4 职业生涯管理与培训 Career Management & Training

5.2.4.1 定义 Definition

职业生涯管理与培训：处理主要的职业阶段，即，招聘、评估、培训和裁员管理。

Career Management & Training: Deals with main career stages i.e. recruitment, evaluation, training and management of layoffs

5.2.4.2 定性承诺 Qualitative Commitments

a) 承诺设立管理、专业、技能操作多种职业发展通道，满足员工不同职业发展需求。通过绩效评估、专业测评、360 度反馈等方式，全面了解员工的能力和潜力，并结合员工兴趣、价值观、职业目标定制有针对性的职业发展规划。

Astronergy commits to setting up various career development channels for management, specialty and skill operation to meet the different career development needs of employees. Conduct performance evaluation, professional evaluation and 360-degree feedback to fully



understand the capabilities and potential of employees, and customize targeted career development plans in combination with employee interests, values and career objectives.

b) 承诺提供内部专项培养、外部学习、轮岗、项目参与等机会，为帮助员工提升技能和经验，构建了分层分类的培养体系，同时指定导师，提供一对一的职业指导和支持，加速职业发展

Astronergy commits to providing opportunities such as internal special training, external learning, job rotation and project participation, build a hierarchical and classified training system to help employees improve their skills and experience, and designate mentors to provide one-to-one career guidance and support to accelerate career development.

c) 承诺建立透明的晋级晋升机制，明确标准和程序，激励员工努力工作争取晋级晋升机会。

Astronergy commits to establishing a transparent promotion mechanism, clarify the promotion standards and procedures, and motivate employees to work hard for promotion opportunities.

5.2.4.3 定量目标 Quantitative Target

中长期目标（至 2035 年）Mid & Long-term targets (By 2035)

a) 至 2035 年累计支持 1000 名员工完成继续教育提升学历（以 2022 年为基准年）

1,000 employees get supports for continuing education and improving academic qualifications (taking 2022 as the base year)

5.2.4.4 审查机制 Review Mechanism

a) 专人负责：设有专门的职业生涯管理部门，并配有专职人员，确保职业生涯管理得到持续关注和推动。

Special person in charge: There is a special career management department staffed with full-time personnel to ensure that career management receives continuous attention and promotion.

b) 定期评估：每年组织人才盘点，全面评估人才结构与质量。开展骨干人员晋级晋升的选拔评定工作，综合评估人才学习与发展的适配情况。

Regular assessment: Talent review is organized every year to comprehensively assess the structure and quality of talent. The selection and evaluation of key personnel for promotion is carried out to comprehensively assess the adaptability of talent learning and development.

c) 绩效考核：通过定期的绩效考核，了解员工在职业生涯中的表现，包括他们的能力、态度、业绩等。绩效考核结果同时也作为员工晋升、加薪或调整岗位的依据。

Performance appraisal: Regular performance appraisal is made to understand the performance of employees in their careers, including their ability, attitude and performance. The results of performance appraisal are also used as the basis for employee promotion, salary increase or post adjustment.

5.2.5 童工、强迫劳动与人口贩卖 Child Labor, Forced Labor & Human Trafficking

5.2.5.1 定义 Definition

童工、强迫劳动与人口贩卖：处理公司运营中的童工、强迫或强制劳动问题

Child Labor, Forced Labor & Human Trafficking: Deals with child, forced or compulsory labor issues within the company owned operations.

5.2.5.2 定性承诺 Qualitative Commitments

公司承诺遵守《世界人权宣言》，加入联合国全球契约组织（**UNGC**），尊重所有内外部员工的个人权利，遵守公司所在地国家和各地政府的劳工标准，禁止使用童工和强迫劳工（包括监狱劳工、契约劳动等任何形式的强迫劳动）。正泰新能尊重员工择业自由，禁止交纳押金、扣押有效证件原件等任何形式的强迫劳动，确保员工完全自愿受雇，且只聘用具有合法工作权利的雇员。公司保证雇员不用承担雇佣的任何费用与成本。公司将向所有员工提供书面劳动协议，不会限制员工的行动自由。

Astronergy commits to abide by the *Universal Declaration of Human Rights*, join the United Nations Global Compact (UNGC), respect the personal rights of all internal and external employees, comply with the labor standards of the country where the Company is located and the labor standards of local governments, and prohibit the use of child labor and forced labor (including prison labor, indentured labor and any other forms of forced labor). Astronergy respects the freedom of employees to choose jobs, prohibits any form of forced labor such as collecting deposit and detaining original valid certificates, ensures that employees are completely voluntarily employed, and only employs employees with legal right to work. The Company guarantees that the employees do not assume any expenses and costs of employment. The Company will provide all employees with a written labor agreement that does not restrict their freedom of movement.

公司不使用监狱工或奴役工，不对雇员进行身体伤害或进行其他任何形式的强制性劳动，不贩卖工人或通过威胁、武力、胁迫、绑架、欺诈等任何其他方式剥削工人，同时告知雇员在法律允许的前提下能够自由离职并终止工作状态。同时，正泰新能也要求商业伙伴遵守同等的禁止性要求，共同建立公平、透明、平等的商业环境。

Astronergy does not use prison labor or slave labor, nor make physical injury to employees or force them to work in any other form, nor traffic in workers or exploit workers by threat, force, coercion, kidnapping, fraud and any other means, and informs employees that they are free to leave their jobs and terminate their working status to the extent permitted by law. Additionally, Astronergy mandates that business partners adhere to equivalent prohibitions, collectively establishing a fair, transparent, and equal business environment.

公司不接受任何使用童工或任何形式的强迫劳动的供应商/分包商以及下级供应商；公司将要求所有供应商/分包商以书面形式约定在其供应链中禁止使用任何形式的强迫劳动，并充分配合公司对强迫劳动问题进行评估。如果公司的供应商/分包商使用任何形式的强迫劳动或未能配合评估或调查



指控，公司将立即终止与该供应商/分包商签订的任何协议，并取消所有受影响的采购。

Astronergy does not accept any supplier/subcontractor and subordinate suppliers who use child labor or any form of forced labor; the Company requires all suppliers/subcontractors to agree in writing that they prohibit using any form of forced labor in their supply chains, and fully cooperate with the Company in assessing forced labor issues. If a supplier/subcontractor of the Company uses any form of forced labor or fails to cooperate in the assessment or investigation of allegations, the Company will immediately terminate any agreement with that supplier/subcontractor and cancel all affected purchases.

5.2.5.3 定量目标 Quantitative Target

童工聘用、强迫劳动、人口贩卖事件发生率为 0。

0 occurrence of child labor, forced labor, and human trafficking

5.2.5.4 审查机制 Review Mechanism

制定《招聘管理》《女职工与未成年工劳动保护管理制度》、《学生工、学生实习管理制度》、《禁止使用童工管理规定》、《反歧视反骚扰反强迫管理程序》等内部制度，严禁聘用法律规定的童工从事工作、严禁强迫劳动。

The Company formulates internal systems such as *Recruitment Management System*, *Labor Protection Management System for Female Employees and Underage Workers*, *Student Worker and Student Internship Management System*, *Management Regulations on Prohibition of Use of Child Labor*, and *Anti-discrimination, Anti-harassment and Anti-coercion Management Procedures*. The Company strictly prohibits employing child labor stipulated by law to work, and strictly prohibits forced labor.

在招聘阶段和日常巡查阶段人工核对身份证，与当地公安机关联动对拟录用疑似童工人员进行预警。

In the recruitment stage and daily inspection stage, the Company requires manual check of ID cards, and works with local public security organs to give early warning to the persons suspected of proposed employment of child labor.

将禁止使用童工纳入供应商社会责任调查与承诺书，严肃处理并直接淘汰使用童工的供应商。

The Company includes the prohibition of use of child labor in the supplier's social responsibility investigation and commitment letter, and seriously deals with and directly eliminates the suppliers who use child labor.

公司高度重视人身自由，禁止如恐吓、威胁、绑架、诈骗任何形式的强迫劳工，保障员工择业权与离职权，禁止对离职者的惩罚报复行为，不得非法扣留员工证件；

The Company attaches great importance to personal freedom, prohibits any form of forced labor such as intimidation, threat, kidnapping and fraud, protects employees' right to choose jobs



and resignation rights, prohibits punishment and retaliation against resigned personnel, and shall not illegally withhold employee certificates;

公司就强迫劳工、工作时长等议题展开供应商摸排调查，确保供应商尊重劳工权利，推动供应商劳工合规。

The Company conducts supplier screening on topics such as forced labor and working hours to ensure that suppliers respect labor rights and promote their labor compliance.

5.2.6 多元化、平等与包容 Diversity, Equity and Inclusion

5.2.6.1 定义 Definition

处理工作场所的歧视和骚扰防范。歧视的定义，是在聘用、薪酬、培训、晋升、雇佣终止中，基于种族、原籍国、宗教、残疾、性别、性取向、工会成员身份、政治立场或年龄，给予人们不同的对待。骚扰可包括工作环境中的身体、心理和言语虐待。

The Company prevents discrimination and harassment in the workplace. Discrimination is defined as giving people different treatment based on race, country of origin, religion, disability, gender, sexual orientation, trade union membership, political stance or age in hiring, salary, training, promotion and termination of employment. Harassment can include physical, psychological and verbal abuse in the work environment.

5.2.6.2 定性承诺 Qualitative Commitments

正泰新能承诺重视并鼓励多元化，打击任何形式的歧视和骚扰。公司提供平等和公平，没有威胁、谩骂、剥削或性侵权行为的工作和生活环境，禁止地域等任何形式歧视、侮辱人格的行为；公司在雇佣、晋升、决定工资或工作安排等任何人事实践中均不会因肤色、种族、宗教、性别、年龄、性取向或残疾而对员工施加歧视性待遇。公司对所有员工予以尊重与尊严，反对任何形式的肉体惩罚与精神或语言上的侮辱；任何对其他员工进行虐待的员工将被立即解雇。

Astronergy commits to value and encourage diversity, and fight against any form of discrimination and harassment. Astronergy provides an equal and fair working and living environment without intimidation, abuse, exploitation or sexual assault, and prohibits any form of indignity and discrimination such as geographical discrimination. Astronergy will not impose discriminatory treatment on employees due to skin color, race, religion, gender, age, sexual orientation or disability in any personnel practice, including employment, promotion, wage determination or work arrangement. Astronergy treats all employees with respect and dignity, opposes any form of physical punishment and mental or verbal indignity, and immediately dismisses any employee who abuses other employees.



5.2.6.3 定量目标 Quantitative Target

中长期目标（至 2035 年）Mid & Long-term targets (By 2035)

- a) 女性员工比例达 40%
40% - Female employee proportion
- b) 女性管理层比例达 30%
30% - Female senior management staff proportion
- c) 女性技术人员比例达 30%
30% - Female technician proportion

5.2.6.4 审查机制 Review Mechanism

公司制定了《反歧视反骚扰反强迫管理程序》，确保员工不因种族、宗教、年龄、性别、怀孕、社团倾向等原因而遭受不正当的对待，创造人人平等、相互尊重的工作环境。

Astronergy formulates the *Anti-discrimination, Anti-harassment and Anti-coercion Management Procedures* to ensure that employees will not be improperly treated due to race, religion, age, gender, pregnancy, association orientation and other reasons, so as to create an equal and respectful working environment for everyone.

公司将企业社会责任意识纳入员工在职培训体系，每年面向所有员工至少开展一次多元化、平等和包容政策相关培训，培训内容包括但不限于提供关于职场歧视或骚扰相关培训。

Social responsibility awareness has been incorporated into the employees on-the-job training system. The company conducts on diversity, equality and inclusion policies, including but not limited to providing training on workplace discrimination or harassment for all employees at least one time per year.

根据员工申诉处理机制与流程，如员工已知或怀疑发生歧视和骚扰虐待，可通过沟通渠道及时上报给人力资源部。

In accordance with employee complaint handling mechanisms and processes, where discrimination, harassment and abuse are known or suspected by employees, employees can report to Human Resources immediately through communication channels.

5.2.7 社会沟通 Social Communication

5.2.7.1 定义 Definition

社会沟通：与公司所在价值链上的各利益相关方开展社会沟通

Social communication: Engaging with various stakeholders along the value chain of the Company

利益相关方：股东和投资者、政府和监管机构、客户、员工、商业伙伴（商业伙伴（包括但不限于承包商、供应商、承租方等）、社会公众和媒体、周边社区（含居民）、科研机构、行业协会、



同行业公司。

Stakeholders: Shareholders and investors, government and regulatory agencies, customers, employees, business partners (including but not limited to contractors, suppliers, lessees, etc.), the general public and media, surrounding communities (including residents), scientific research institutions, industry associations, and peer companies.

5.2.7.2 定性承诺 Qualitative Commitments

正泰新能高度重视各利益相关方切身利益，高度关注与各利益相关的沟通交流。正泰新能承诺与各利益相关方建立透明、开放、及时、多样的沟通渠道，分享重要信息和决策过程，并及时回应利益相关方的反馈和提问；承诺在重要决策中广泛征求利益相关方的意见和建议，确保他们的声音被充分听取和纳入决策过程；承诺积极处理和解决与利益相关方之间的冲突和争议，寻求共同利益和解的途径，并确保公正和平等的待遇；承诺与所在社区建立良好的合作关系，支持社区发展项目、社会责任活动和公益事业，回馈社区和促进社会进步。正泰新能为保护利益相关方权益，提供多渠道申诉途径，投诉热线、投诉邮箱、投诉与帮助服务台、总经理信箱等。申诉机制的制定和实施符合联合国《工商业与人权非指导原则》要求，即合法的，人人都能得到，公平、透明、兼容，是持续学习的源泉。

Astronergy places great importance on the genuine interests of all stakeholders and maintains a high level of attention to communication and dialogue with them. Astronergy commits to establish transparent, open, timely, and diverse communication channels with all stakeholders, sharing crucial information and decision-making processes, and promptly responding to stakeholder feedback and inquiries; extensively seek the opinions and advice of stakeholders in significant decisions, ensuring their voices are fully heard and integrated into the decision-making process; actively address and resolve conflicts and disputes with stakeholders, seeking pathways to mutual benefit and resolution while ensuring fair and equal treatment; foster positive relationships with local communities, supporting community development projects, social responsibility activities, and charitable initiatives, thereby giving back to the community and promoting social progress. Astronergy provides multiple channels for grievance to protect the rights and interests of stakeholders, including complaint hotline, complaint email, complaint and assistance service desk, and general manager email, etc. Grievance mechanism developed and implemented in line with the requirements of the UN Guiding principles on Business and Human Rights which is legitimate, accessible to all, predictable and clear, equitable, transparent, compatible, a source of continuous learning.

正泰新能尊重员工结社自由与谈判权利，成立工会组织，制定《员工自由结社政策》《自由结社集体谈判》制度，绝不干涉员工任何结社自由权和集体谈判权。公司各基地就劳动报酬、工作时间、休息休假、工资协商等事项，通过集体协商签订书面协议。

Astronergy respects the freedom of association and negotiation rights of its employees,



establishing union organizations and implementing policies such as the Free Association Policy for Employees and the Free Association and Collective Bargaining System. Astronergy unequivocally refrains from interfering with employees' rights to freely associate and engage in collective bargaining. Across its various bases, agreements on matters such as labor compensation, working hours, rest periods, and wage negotiations are reached through collective bargaining and formalized in written agreements.

5.2.7.3 定量目标 Quantitative Target

短期目标（至 2028 年）Short-term targets (By 2028)

a) 各基地集体合同签署率 100%。

100% - Annual signing rate of collective contracts for each base

b) 每年至少开展 1 次利益相关方问卷调研和实质性议题分析，了解并回应利益相关方期望和需求。

Conduct at least one stakeholder surveys and substantive topic analysis annually to understand and respond to stakeholder expectations and needs.

中长期目标（至 2035 年）Mid & Long-term targets (By 2035)

a) 客户满意度≥95 分

95 points or higher - Customer satisfaction score

5.2.7.4 审查机制 Review Mechanism

每年对利益相关方开展问卷调研，进行分析和总结，得出高、中、低实质性议题，并针对利益相关方需求，制定相应策略，旨在确保利益相关方权益及需求得到满足，促进公司可持续发展。

Annually conduct stakeholder questionnaire surveys, analyze and summarize findings to identify high, medium, and low priority substantive issues. Develop corresponding strategies tailored to stakeholder needs to ensure their rights and requirements are met, thereby promoting sustainable development of the Company.

5.2.8 维生工资 Living Wage

5.2.8.1 定义 Definition

维生工资是指使工人及其家庭能够负担得起工人及其家庭的体面生活水平的工资，包括食品、水、住房、教育、医疗保健、交通、服装和其他必要费用等必需品，包括为意外事件提供的准备金。

A living wage is one that enables workers and their families to afford a decent standard of living for the worker and their family, covering essentials such as food, water, housing, education, healthcare, transportation, clothing and other necessary expenses, including provisions for unexpected events.



5.2.8.2 定性承诺 Qualitative Commitments

公司承诺遵守《世界人权宣言》和国际劳工组织的相关公约，承诺关注员工的工作与生活条件，基于国际认可的维生工资方法论，根据各个基地的实际情况制定维生工资标准，最终使所有员工收入逐步达到维生工资基准，并持续支付维生工资。

The company is committed to complying with the Universal Declaration of Human Rights and relevant conventions of the International Labour Organization, and is committed to focusing on employees' working and living conditions. It sets living wage standards based on the internationally recognized living wage methodology, tailored to the specific conditions of each base. This aims to gradually ensure all employees' earnings meet the living wage benchmark and that this standard is continuously maintained.

此外，正泰新能尊重员工的合法权益，始终确保员工的工资不低于当地最低工资标准，并根据公司的实际情况和员工的工作表现，适时调整工资水平，确保员工能够获得与其劳动相应的报酬，同时确保员工的工资能够满足其基本生活需求，包括衣食住行、医疗、教育等基本生活成本。

In addition, Astronergy respects employees' legal rights, always ensures their wages are no less than the local minimum wage, and makes timely adjustments to wage levels based on the company's actual situation and employees' performance. This guarantees employees receive fair compensation for their work and that their wages meet basic living needs, including food, clothing, housing, transportation, medical care, and education.

5.2.8.3 定量目标 5.3.2 Quantitative Target

短期目标（至 2030 年）Short-term targets (By 2030)

a) 维生工资基准分析所涵盖的直属员工百分比为 100%

Percentage of direct employees covered by a living wage benchmarking analysis

b) 100%直属员工工资不低于当地维生工资基准

100% of direct employees receive wages meeting or exceeding the locally determined living wage benchmark.

5.3 商业道德政策 Business Ethics Policy

5.3.1 定性承诺 Qualitative Commitments

正泰新能重视并持续营造企业诚信文化，严厉禁止员工直接实施或者通过代理人或者其他中间人间接实施任何形式的腐败行为、欺诈行为、共谋行为、胁迫行为和阻碍行为等任何不当行为。同时，正泰新能也要求商业伙伴遵守同等的禁止性要求，共同建立公平、透明、廉洁的商业环境。

Astronergy places significant emphasis on fostering a culture of corporate integrity, strictly prohibiting employees from engaging in any form of misconduct such as corruption, fraud, conspiracy, coercion, obstruction, whether directly or indirectly through agents or intermediaries.

Additionally, Astronergy mandates that business partners adhere to equivalent prohibitions, collectively establishing a fair, transparent, and ethical business environment.

正泰新能高度重视守法合规，坚决遵守适用的法律法规开展公平竞争，采用严格的管控措施进行贸易合规，防止内幕交易、避免利益冲突，反洗钱、反逃税等。同时，正泰新能也要求商业伙伴遵守同等的要求，共同建立公平、透明、合法合规的商业环境。

Astronergy prioritizes compliance with laws and regulations, steadfastly adhering to applicable laws for fair competition, implementing rigorous controls for trade compliance to prevent insider trading, conflict of interest, money laundering, and tax evasion. Simultaneously, Astronergy requires that business partners comply with these requirements, jointly fostering a fair, transparent, legal, and compliant business environment.

在合规举报方面，公司将提供足够的机会和程序保障，以便员工和相关方可以及时与公司沟通。员工或其他相关方如得知任何违反本政策的指控和/或发现违反本政策的情况，应按照《举报与调查制度》。公司将立即对指控进行调查，以确定是否存在违反本政策的情况。公司将对举报的员工的姓名和身份信息保密，任何员工都不会因举报而受到负面影响。

In terms of compliance reporting, the Company ensures sufficient opportunities and procedures for employees and interested parties to communicate promptly with the Company. Employees or other interested parties who become aware of any allegations or instances of policy violations shall follow the *Reporting and Investigation System*. The Company will promptly investigate allegations to determine any violations of this Policy, ensuring confidentiality of the whistleblower's identity and information, with no adverse repercussions for whistleblowers.

负责任信息管理方面，公司始终保护员工、前员工、客户、供应商和其他相关方的个人信息和隐私，遵守各国数据保护相关规定。我们承诺搭建个人信息保护体系，确保业务流程均符合数据要求。公司严格遵守业务所在地有关信息安全的法律法规，实施适当措施确保数据和信息的安全。我们承诺采取有效的技术手段和组织管理措施确保信息的安全性，对不再使用的个人数据及时删除或匿名化处理，部署数据防泄漏系统。公司坚持履行应尽的保密义务，采取适当措施确保保密信息不被不当使用，对保密信息的交流始终保持谨慎的态度，确保所有员工重视保密信息的机密性，未经信息主体同意，不公开、复制、留存或以其他方式使用保密信息。

Regarding responsible information management, the Company consistently protects the personal information and privacy of employees, former employees, customers, suppliers, and other stakeholders, complying with relevant data protection regulations worldwide. We commit to establish a personal information protection system, ensuring all business processes meet data requirements. The Company strictly complies with local laws and regulations on information security, implementing appropriate measures to safeguard data and information. We commit to use effective technical and organizational measures to ensure information security, promptly deleting or anonymizing personal data that is no longer in use, and deploying data



leakage prevention systems. The Company upholds confidentiality obligations, taking appropriate measures to prevent the improper use of confidential information, maintaining a cautious approach in communicating confidential information, and ensuring all employees recognize the confidentiality of such information, refraining from disclosing, copying, retaining, or otherwise using confidential information without the consent of the data subject.

5.3.2 定量目标 Quantitative Target

短期目标（至 2028 年）Short-term targets (By 2028)

反贪污腐败定量目标：所有运营场址商业道德审计（包括反腐败、避免利益冲突、反洗钱及反欺诈等内容）覆盖率 100%。

Quantitative target of anti-corruption: Achieve 100% coverage of business ethics audits at all operational sites (including anti-corruption, conflict of interest, anti-money laundering, and anti-fraud measures).

反竞争行为定量目标：

Quantitative targets for anti-competitive practices:

a) 对全体员工反竞争行为培训覆盖率 100%；

Achieve 100% training coverage on anti-competitive practices for all employees;

b) 对关键业务流程（采购、销售等）反竞争行为审核覆盖率 100%；

Achieve 100% audit coverage on anti-competitive practices for key business processes (e.g., procurement, sales);

c) 不当竞争事件发生数量 0

Achieve 0 incidents of improper competitive behavior.

负责任信息管理定量目标：所有运营场址信息安全管理体系认证（ISO 27001）覆盖率达到 70%

Quantitative Target for responsible information management: Achieve 70% certification coverage of Information Security Management Systems (ISO 27001) across all operational sites

5.3.3 详细的商业道德准则与示例 Detailed Code of Business Ethics And Examples

5.3.3.1 贪污腐败 Corruption

贪污腐败即滥用受托权力以谋取私利，包括敲诈勒索、贿赂、利益冲突、欺诈、洗钱等等。具体可定义为在商业行为中索取或接受任何形式的礼物、贷款、费用、奖励或其他好处，以诱使某人做出不诚实、非法或违反信任行为；或将非法所得的资金通过一系列金融交易，使其看起来像是合法资金等行为。公司严格遵守诚信合规义务，禁止员工直接实施或者通过代理人或其他中间人间接实施任何形式的贪污腐败行为，也要求商业伙伴遵守同等禁止性要求。

Corruption refers to the abuse of fiduciary power for personal gain, including extortion, bribery, conflicts of interest, fraud, money laundering, etc. It can be specifically defined as soliciting or accepting any form of gift, loan, fee, reward, or other benefit in business conduct to induce

someone to engage in dishonest, illegal, or trust-violating behavior; or using illegally obtained funds through a series of financial transactions to make them look like legitimate funds. The company strictly adheres to the obligation of integrity and compliance, prohibits employees from directly committing or indirectly committing any form of corruption through agents or other intermediaries, and also requires business partners to comply with the same prohibition requirements.

5.3.3.1.1 贿赂行为 Bribery Practices

定义：指直接或间接向国际、国家或地方一级的公职人员、政党、政党官员或政治职位候选人、私人的董事、官员或雇员提供、许诺提供（行贿）或接受（受贿）任何不应有的金钱或其他好处，以获得或保留商业机会或其他不正当的利益，如签订公共或私人采购合同、授予监管许可证或税收、海关、司法和立法程序等有关的利益。

Definition: The offering, promising or accepting, directly or indirectly, of any undue pecuniary or other advantage to government officials, political parties, party officials or candidates for political office, directors, officers or employees of private individuals at the international, national or local level in order to obtain or retain business opportunities or other improper advantages, such as in connection with public or private procurement contracts, the granting of regulatory licences or tax, customs, judicial and legislative proceedings.

合规准则 Compliance Standards

我们禁止员工以任何理由、任何形式在任何地区实施贿赂行为，禁止通过直接或间接的提供、给予、接受或者索取财物以不正当的影响另一方行动；

We prohibit employees from engaging in bribery for any reason or in any form in any region, and prohibit improperly influencing another party's actions by directly or indirectly offering, giving, accepting, or soliciting money.

我们建立反贿赂管理体系，发布《诚信合规商业行为管理制度》《反贿赂管理手册》等规范；

We have established an anti-bribery management system and issued policies such as the *The Code of Integrity, Compliance and Business Conduct* and the *Anti-Bribery Management Manual*.

我们制定礼品和招待的相关标准及审批流程，禁止以接受或提供礼品或招待等方式变相实施商业贿赂；

We establish relevant standards and approval processes for gifts and entertainment, and prohibit the disguised implementation of bribery by accepting or providing gifts or entertainment.

我们设立捐赠和赞助的相关标准及审批流程，禁止以慈善事业、社会公益等方式变相实施商业贿赂；

We establish relevant standards and approval processes for donations and sponsorship, and prohibit disguised commercial bribery through charitable causes, social welfare, and other means.

我们设立针对敏感岗位的任前尽调、轮岗安排及岗位隔离等管理措施，以完善高风险岗位的反



贿赂管理；

We have established management measures such as due diligence, job rotation, and job isolation for sensitive positions to improve anti-bribery management for high-risk positions.

我们设立内部监察及奖惩机制，禁止员工利用职务上的便利，侵吞、窃取、骗取或者以其他手段非法占有公司财产，或为本人配偶、子女及其他特定关系人谋取职位或者经济利益，或将公司利益违规输送给其他第三人。

We have established internal supervision and reward and punishment mechanisms to prohibit employees from using their positions to embezzle, steal, defraud, or illegally occupy company property by other means, or to seek positions or economic benefits for their spouses, children, and other specific related parties, or to illegally transfer company benefits to other third parties.。

我们应该怎么做？ How to Do？

禁止为了相关业务或利益，直接或间接地提供或承诺提供任何有价值的物品，包括但不限于返利、贿赂、回扣、佣金、现金或其他任何形式的利益，或批准、参与或授权上述行为，以影响客户或商业伙伴的相关人员或政府官员的决策；

It is prohibited to directly or indirectly provide or promise to provide any valuable items, including but not limited to rebates, bribes, kickbacks, commissions, cash, or any other form of benefit, or to approve, participate in, or authorize the above actions to influence the decisions of relevant personnel or government officials of customers or business partners for related business or interests.

禁止直接或间接地向商业伙伴索取、收受任何与公司业务有关的报酬、好处或个人利益；

It is prohibited to directly or indirectly solicit or accept any remuneration, benefits, or personal benefits related to the company's business from business partners.

禁止支付任何形式的便利费。在某些特殊情况下，员工的健康安全遭受迫在眉睫的严重威胁，除了支付便利费外别无选择，这种胁迫将被视为敲诈勒索，其支付的费用将作为例外情况允许支付；

It is prohibited to pay any form of convenience fee. In certain special circumstances, where the health and safety of employees are under imminent and serious threat, there is no choice but to pay the convenience fee. This kind of coercion will be regarded as extortion, and the fees paid will be allowed to be paid as exceptional circumstances.

我们在业务过程以及商业伙伴交往中，必须将相关的礼品收受和招待活动限制在合理的商业活动和社交礼仪的范围之内，确保这些活动符合当地商业惯例和法律要求，只提供和接受不会影响或几乎不会影响员工以公司最大利益行事判断的礼品和招待；

In business processes and interactions with business partners, relevant gift acceptance and hospitality activities must be limited to reasonable business activities and social etiquette, ensuring that these activities comply with local business practices and legal requirements, and only providing and accepting gifts and hospitality that will not affect or almost affect employees' judgment of acting in the best interests of the company



在发现贿赂或其他不当行为时，及时举报。公司将保护举报人，确保其不会受到任何形式的报复；

Report bribery or other misconduct in a timely manner. The company will protect whistleblowers and ensure that they will not be subject to any form of retaliation.

我们的员工应充分了解并遵守所在国及业务所在地适用的反贿赂法律法规。定期参加合规培训，以确保对相关法律法规的理解和遵守。

Our employees should fully understand and comply with the anti-bribery laws and regulations applicable in the country and business location. Regularly participate in Compliance Training to ensure understanding and compliance with relevant laws and regulations.

5.3.3.1.2 欺诈行为 Fraudulent Practice

定义：指以获得财产利益或逃避某种义务为目的，进行故意或疏忽大意的虚假陈述，错误地引导或企图误导一方的作为或不作为行为。

Definition: Refers to the act or omission of intentionally or negligently making false statements, misleading or attempting to mislead one party for the purpose of obtaining property benefits or evading certain obligations

合规准则 Compliance Standards:

我们承诺不参与任何形式的欺诈行为，维护诚信透明的合作氛围。我们已设立反欺诈相关的管理措施，针对员工及商业伙伴建立管理制度和 workflows，设立风险防控机制，接收调查和处理公司内外部举报，组织反欺诈培训，维护公司诚信透明氛围。

We promise not to participate in any form of fraud and maintain a cooperative atmosphere of integrity and transparency. We have established anti-fraud management measures, established management systems and workflows for employees and business partners, established risk prevention and control mechanisms, received investigations and handled internal and external reports, organized anti-fraud training, and maintained an atmosphere of integrity and transparency in the company.

我们应该怎么做？How to do？

我们在商业交往中，需保持最高诚信和合规行为标准，恪守诚实守信的价值观，不利用虚假信息或误导性陈述来获取不当利益，确保所有交易都是基于真实、准确的信息；

In our business dealings, we must maintain the highest standards of integrity and compliance, adhere to the values of honesty and trustworthiness, not use misinformation or misleading statements to obtain improper benefits, and ensure that all transactions are based on true and accurate information.

不通过欺诈手段欺骗公司、社会大众或商业伙伴，任何合同行为都应遵循诚信原则，维护公司的良好信誉和利益；

Do not deceive the company, the public, or business partners through fraud. Any contractual

behavior should follow the principle of good faith and maintain the company's good reputation and interests.

不故意骗取或盗用公司财产，不盗用他人身份信息进行非法活动，不操纵财务报告、挪用资产、或通过欺诈手段进行不当的财务操作获取收入或资产，所有与公司财产相关的行为都应真实、合法，所有业务操作应基于合法的身份和权限。

Do not intentionally deceive or embezzle company property, do not use other people's identity information for illegal activities, do not manipulate financial reports, misappropriate assets, or obtain income or assets through fraudulent means. All actions related to company property should be true and legal, and all business operations should be based on legal identity and authority.

5.3.3.1.3 避免利益冲突 Avoid Conflicts of Interest

定义：指商业、财务、家庭、政治或个人利益能够干扰人们在行使组织职责中的判断的情况。

Definition: Refers to situations where business, financial, family, political, or personal interests can interfere with people's judgment in performing organizational duties.

合规准则 Compliance Standards:

我们禁止自身及商业伙伴与有利益冲突的公司或个人进行个人财务交易或其他商业交易，包括直接或间接的同意或其他利益冲突。

We prohibit ourselves and our business partners from engaging in personal financial or other business transactions with companies or individuals who have conflicts of interest, including direct or indirect consent or other conflicts of interest.

我们应该怎么做？ How to do?

遵循公正、公平原则开展工作，遵守《利益冲突回避制度》，同时按照符合公司的最大利益的方式行事，避免出现任何潜在或真实存在的利益冲突；

Work in accordance with the principles of fairness and impartiality, comply with the Conflict of Interest Avoidance Policy, and act in a way that is in the best interests of the company to avoid any potential or real conflicts of interest.

员工应时刻关注可能发生的利益冲突情况，并及时、如实填写《信息披露和申报表》进行申报。经公司确认存在实际或者潜在利益冲突的，员工应当配合公司作出相应调整，以避免利益冲突引发的风险。

Employees should always pay attention to possible conflicts of interest and timely and truthfully fill out the Information Disclosure and Declaration Form for declaration. If the company confirms the existence of actual or potential conflicts of interest, employees should cooperate with the company to make corresponding adjustments to avoid risks caused by conflicts of interest.

5.3.3.1.4 反洗钱 Anti-Money Laundering

定义：洗钱是指以掩盖违法犯罪所得为目的，将非法资金合法化的价值转移过程，也包含通过交易掩盖资金去向以资助各类犯罪的行为，如恐怖主义融资。



Definition: refers to the value transfer process of legalizing illegal funds for the purpose of concealing illegal criminal proceeds, and also includes the behavior of concealing the whereabouts of funds through transactions to fund various crimes, such as terrorist financing.

合规准则 **Compliance Standards:**

我们禁止自身及商业伙伴参与、实施或隐瞒任何洗钱行为；

We prohibit ourselves and our business partners from participating in, carrying out, or concealing any money laundering activities. 我们承诺遵守所有适用的反洗钱法律法规，不将产品和服务用于洗钱目的，业务交易不涉及洗钱行为，并要求商业伙伴也做出同等承诺；

We promise to comply with all applicable Anti Money Laundering laws and regulations, not use products and services for money laundering purposes, do not involve money laundering in business transactions, and require our business partners to make the same commitment.

我们设置针对商业伙伴的反洗钱背景调查程序，背景审查包括对其财务状况和商业行为的全面评估，我们承诺不与存在洗钱风险的商业伙伴开展业务合作。

We have established an Anti Money Laundering due diligence procedure for business partners, which includes a comprehensive evaluation of their financial status and business conduct. We promise not to conduct business cooperation with business partners who pose a risk of money laundering.

我们应该怎么做？ **How to do?**

在业务过程中需始终关注潜在的洗钱和资助恐怖主义的风险；

Always be aware of potential money laundering and terrorist financing risks during the business process.

定期参与反洗钱培训及宣传，提高对可疑交易的识别能力，并及时向合规部门报告任何可疑活动；

Regularly participate in Anti Money Laundering training and publicity to improve the ability to identify suspicious transactions and report any suspicious activities to the Compliance Department in a timely manner.

应优先选择信誉良好的金融机构，积极配合金融机构对公司及客户身份的识别要求，确保交易的合法性和透明性；

Cooperate with financial institutions' identification requirements for companies and customers, and ensure the legality and transparency of transactions.

应与合法经营、财务来源透明的企业保持业务关系。

Business relationships should be maintained with enterprises that operate legally and have transparent financial sources.

5.3.3.1.5 共谋行为 **Collusive Practice**

定义：是指由双方或多方计划的一种为达到不当目的的安排，例如不适当地影响其他方的行为。

Definition: Refers to an arrangement planned by two or more parties to achieve improper



purposes, such as improperly influencing the behavior of other parties.

合规准则 **Compliance Standards:**

我们禁止员工为了达到不当目的，由双方或多方进行有目的的设计安排或串通，以不适当的方式实施影响另一方的行为。

We prohibit employees from engaging in purposeful design arrangements or collusion by two or more parties to influence the behavior of the other party in an inappropriate manner in order to achieve improper purposes.

我们在如招投标等环节设置管理流程、奖惩机制及监控体系，以识别和打击共谋行为。

We have established management processes, reward and punishment mechanisms, and monitoring systems in areas such as bidding to identify and combat collusive behavior.

我们应该怎么做？ **How to do?**

在参与商业活动时，应始终保持敏感，拒绝来自任何商业伙伴提出的共同操控价格或市场行为的请求，在招投标过程中杜绝围标、串标行为。

When participating in business activities, employees should always remain sensitive, reject requests from any business partners to jointly manipulate prices or market behavior, and prevent bid rigging and collusion during the bidding process.

发现任何可疑的共谋行为，应及时向合规管理部门报告，确保公司能够采取适当的措施进行调查和处理。

Any suspicious collusion should be promptly reported to the Compliance Department to ensure that the company can take appropriate measures for investigation and handling.

5.3.3.1.6 胁迫行为 **Coercive Practice**

定义：是指直接或间接地以伤害或威胁伤害一方身体，或损害或威胁损害一方财产的方式，达到不适当地影响该方行为目的行为。

Definition: Refers to behavior that directly or indirectly harms or threatens to harm one party's body, or damages or threatens to damage one party's property, in a way that improperly affects the behavior of that party.

合规准则 **Compliance Standards:**

我们禁止员工直接地或间接地伤害或者破坏、或威胁将伤害或破坏任何一方或其财产，同时也保护员工使其免受任何形式的胁迫。

We prohibit employees from directly or indirectly harming or damaging, or threatening to harm or damage any party or its property, and also protect employees from any form of Coercive Practice.

我们应该怎么做？ **How to Do?**

我们在遇到胁迫时，应保持冷静，及时记录相关细节，为后续的调查提供重要证据，并通过沟通机制及举报渠道寻求帮助，维护自身合法权益。



When we encounter coercion, we should remain calm, record relevant details in a timely manner, provide important evidence for subsequent investigations, and seek help through communication mechanisms and reporting channels to safeguard our legitimate rights and interests.

5.3.3.1.7 阻碍行为 Obstructive Practice

定义：是指故意销毁、伪造、篡改或隐瞒对调查有重要意义的证据，或向调查人员作出虚假陈述，以严重妨碍对不当行为相关的指控所进行的任何调查；和/或威胁、骚扰或恐吓任何人，阻止其披露与调查相关事项的信息或继续接受调查；意图严重妨碍有关当局或机构行使检查和审计权利的行为。

Definition: Refers to intentionally destroying, falsifying, tampering with, or concealing evidence that is significant to the investigation, or making false statements to investigators, in order to seriously hinder any investigation into allegations of misconduct; and/or threatening, harassing, or intimidating anyone to prevent them from disclosing information related to the investigation or continuing to be investigated; behavior that intends to seriously hinder the exercise of inspection and audit rights by relevant authorities or institutions.

合规准则 Compliance Standards:

我们禁止员工以任何理由，任何形式妨碍或阻止有关当局或机构行使调查的权利，禁止员工故意销毁、伪造、篡改或隐瞒对调查有重要意义的证据，或向调查人员做出虚假陈述等行为。

We prohibit employees from obstructing or preventing relevant authorities or institutions from exercising their right to investigate for any reason or in any form, and prohibit employees from intentionally destroying, forging, tampering with, or concealing evidence that is significant to the investigation, or making false statements to investigators.

我们应该怎么做？How to do?

如接到调查人员的询问，应提供真实、准确的信息。如果对某些问题不清楚，及时说明，而非提供虚假或误导性的信息。

If you receive inquiries from investigators, you should provide truthful and accurate information. If you are unclear about certain issues, explain them in a timely manner instead of providing false or misleading information.

在处理与调查相关的文件或数据时，确保妥善保管，不得随意删除或修改任何与调查相关的记录。

When handling documents or data related to investigations, ensure proper storage and do not arbitrarily delete or modify any records related to investigations.

5.3.3.2 反竞争行为 Anti-Competitive Practices

定义：反竞争行为包括但不限于：操纵投标、价格垄断、倾销、掠夺性定价、强制垄断、划分



势力范围、产品搭售、限制定价和不尊重知识产权。

Definition: Anti-competitive Practices includes but is not limited to: bid rigging, price fixing, dumping, predatory pricing, coercive monopolies, division of power, product tying, price restriction, and disrespect for intellectual property rights.

5.3.3.2.1 公平竞争 Fair Competition

定义：公平竞争指实施维护市场竞争秩序、遵守商业道德、保护消费者及社会公共利益的竞争行为，拒绝包括但不限于垄断行为、虚假宣传、假冒行为、混淆行为、商业诋毁、侵犯商业秘密以及串通投标等，利用网络实施不正当竞争及违规关联交易等行为。

Definition: Refers to the implementation of competition behaviors that maintain market competition order, comply with business ethics, protect consumers and public interests, and reject behaviors including but not limited to monopolistic behavior, false advertising, counterfeiting, confusion, commercial defamation, infringement of trade secrets, and collusion in bidding, as well as the use of the internet to implement unfair competition and illegal related party transactions.

合规准则 Compliance Standards:

我们禁止任何损害消费者与社会公共利益的不正当竞争行为，自觉维护良好的市场秩序。

We prohibit any unfair competitive practices that harm consumer and public interests, and conscientiously uphold a healthy market order.

a) 禁止任何形式的垄断行为。各单位在没有法定许可的情况下，禁止利用其市场地位，实施阻碍贸易、限制和排除公平竞争的行为，包括禁止达成并实施垄断协议、禁止滥用市场主导地位以排挤其他竞争者以及禁止实施具有或者可能具有排除、限制竞争效果的经营者集中。

Any form of monopoly practices is prohibited. Without statutory permission, all departments are prohibited from using their market position to obstruct trade, restrict, or exclude fair competition. This includes prohibiting the formation and implementation of monopoly agreements, prohibiting the abuse of market dominance to exclude other competitors, and prohibiting the implementation of business concentrations that have or may have the effect of excluding or restricting competition.

b) 禁止任何形式的不正当竞争行为。各单位在经营活动中，禁止采取违反公认商业道德的手段，实施争取交易机会或者破坏其他经营竞争优势或者扰乱社会经济秩序的行为，包括但不限于禁止虚假宣传、禁止假冒行为、禁止混淆行为、禁止商业诋毁、禁止侵犯商业秘密以及禁止串通投标等，禁止利用网络实施不正当竞争行为。

Any form of unfair competition is prohibited. In their business activities, all departments are prohibited from using means contrary to recognized business ethics to gain transaction opportunities, undermine the competitive advantages of other businesses, or disrupt social and economic order. This includes but is not limited to prohibiting false advertising, counterfeiting,

confusion, commercial defamation, infringement of trade secrets, and collusion in bidding, and prohibiting the use of the internet for unfair competition.

c) 禁止违规关联交易。各单位进行关联交易时，应保持公司的独立性，禁止利用关联交易调节财务指标，损害公司利益。禁止交易各方隐瞒关联关系或者采取其他手段，规避公司的关联交易审议程序和信息披露义务。

Improper related-party transactions are prohibited. When engaging in related-party transactions, all departments must maintain the Company's independence and are prohibited from manipulating financial indicators to the detriment of the Company's interests. It is prohibited for parties to transactions to conceal related relationships or employ other means to circumvent the related-party transaction review procedures and disclosure obligations of the Company.

我们应该怎么做？ How to do?

不与竞争对手签订或达成任何形式的反竞争或垄断协议，包括书面协议、口头协议以及任何协同行为；

Do not sign or enter into any form of anti-competitive or monopoly agreement with competitors, including written agreements, oral agreements, and any collaborative actions.

不与竞争对手交换商业秘密，不参与任何形式的投标操控行为；

Do not exchange trade secrets with competitors and do not participate in any form of bid manipulation.

遵守适用法律中关于销售或采购协议的竞争限制条款。不从事价格歧视、捆绑销售或拒绝交易等行为。

Comply with the competition restrictions in applicable laws regarding sales or purchase agreements. Do not engage in price discrimination, bundling sales, or refusal to trade.

5.3.3.2.2 贸易合规 Trade Compliance

定义：指从事商业活动或交易过程中遵守所适用的国内和国际贸易合规法律法规，包括但不限于出口管制、制裁、海关、税务等方面的法律法规。

Definition: Refers to complying with applicable domestic and international trade laws and regulations in the course of business activities or transactions, including but not limited to export control, sanctions, customs, taxation and other laws and regulations.

合规准则 Compliance Standards:

我们禁止与被列入出口管制清单的实体或个人、任何禁运国家或地区、被制裁实体或个人进行可能导致违反出口管制、制裁相关法律法规及合同义务的商业活动或交易；

We prohibit commercial activities or transactions with entities or individuals listed on the export control lists, any embargoed country or region, or sanctioned entities or individuals that may result in the violation of laws and regulations and contractual obligations related to export control and sanctions.



我们开展交易前对项目背景、项目涉及地、所涉主体、所涉物项等关键信息展开合规筛查，强化最终用户、最终用途管理，要求商业伙伴遵守出口管制、制裁相关法律法规及我们的诚信和合规方案，并在交易过程中对项目进行持续监督，确保符合相关要求；

We conduct compliance screening on key information such as project background, location, parties involved, and items involved before conducting transactions, strengthen end-user and end-use management, require business partners to comply with export control, sanction-related laws and regulations, and our integrity and compliance program, and continuously supervise the project during the transaction process to ensure compliance with relevant requirements.

我们禁止走私货物、物品进出境以及利用走私货物、物品。

We prohibit the smuggling of goods and items into and out of the country as well as the use of smuggled goods and items

我们应该怎么做？How to do?

开展交易前准确及时披露项目背景、项目涉及地、所涉主体等关键信息以便展开合规筛查，并在交易过程中对项目进行持续监督，确保符合相关法律法规和诚信和合规方案；

Accurately and timely disclose key information such as project background, location, and parties involved before conducting transactions for compliance screening, and continuously supervise the project during the transaction process to ensure compliance with relevant laws and regulations and integrity and compliance programme.

接受贸易合规相关培训，学习《正泰高危国家报告》等贸易合规政策文件，遵守其中对于出口管制和制裁的限制性规定。

Receive training on trade compliance, study trade compliance policy documents such as the *CHINT High-Risk Country Report*, and comply with the restrictive provisions on export control and sanctions.

5.3.3.2.3 防止内幕交易 Prevent Insider Trading

定义：指自身及商业伙伴利用涉及发行人的经营、财务或者对该发行人证券的市场价格有重大影响的尚未公开的信息进行交易。

Definition: Refers to the transaction of oneself and business partners using undisclosed information that involves the publisher's operations, finances, or has a significant impact on the market price of the public **合规准则 Compliance Standards:**

禁止以窃取、骗取、窃听、利诱等非法手段获取内幕信息；

It is prohibited to obtain Insider Information by illegal means such as theft, deception, eavesdropping, and inducement;

禁止内幕信息知情人在内幕信息公开前，买卖发行人的证券、泄露该信息或者建议他人买卖该



证券。

It is prohibited for Insider Information insiders to buy or sell the publisher's securities, disclose the information, or suggest others to buy or sell the securities before Insider Information is made public.

合规小贴士 **Compliance Tips:**

什么是内幕信息？ What is Insider Information?

内幕信息主要包括以下几个类型：

Insider Information mainly includes the following types:

a) 涉及上市公司的财务信息；

Financial information related to Listed Company.

b) 涉及上市公司增资、减资、股权激励的信息；

Information related to capital increase, reduction, and equity stake incentives of Listed Company.

c) 涉及上市公司经营的重大信息；

Significant information related to the operation of Listed Company.

d) 涉及上市公司股权结构、控制权变动的重大信息；

Significant information involving changes in the equity structure and control rights of Listed Companies.

e) 涉及上市公司董事、监事、高级管理人员的重大信息；

Significant information involving directors, supervisors, and senior management personnel of Listed Company.

f) 涉及上市公司的违法违规行为的重大信息；

Significant information related to illegal and irregular activities of Listed Company.

g) 涉及上市公司实际控制人的重大信息；

Significant information involving the actual controller of the Listed Company.

h) 涉及上市公司控股子公司、参股公司的重大信息；

Significant information related to Listed Company's holding subsidiaries and participating companies.

i) 其他涉及上市公司的重大信息。

Significant information related to the operation of Listed Company.



5.3.3.2.4 反逃税 Anti-Tax Evasion

定义：是指一种使用非法手段来减轻或逃避纳税义务的违法行为。当个人、企业或信托基金明知其有纳税义务，但以欺骗性意图，不申报或者通过少报收入或收益或者多报扣除或损失的方式申报，即构成逃税。

Definition: Refers to an illegal act of using illegal means to reduce or evade tax obligations. When an individual, enterprise, or trust fund knows that they have tax obligations, but with deceptive intent, fails to declare or declares by underreporting income or benefits or overreporting deductions or losses, it constitutes tax evasion.

合规准则 Compliance Standards:

我们承诺遵守适用的税法及与交易、付款有关的会计、簿记与财务报告规定，依法缴纳税款。

We promise to abide by applicable tax laws and accounting, bookkeeping and financial reporting requirements related to transactions and payments, and to pay taxes in accordance with the law.

我们应该怎么做？ How to Do?

遵守适用的税法及与交易、付款有关的会计、簿记与财务报告规定，依法缴纳税款，并要求商业伙伴也做出同等承诺；

Comply with applicable tax laws and accounting, bookkeeping, and financial reporting regulations related to transactions and payments, pay taxes in accordance with the law, and require business partners to make equal commitments.

关键岗位应定期参加反逃税培训及宣传。

Key positions should regularly participate in anti-tax evasion training.

5.3.3.2.5 保护知识产权 Protection of Intellectual Property Rights

我们积极保护公司所有的知识产权，尊重他人的知识产权，遵守业务所在地与知识产权相关的法律规定，制定相关战略，设立专门部门负责知识产权业务。

We actively protect all intellectual property of the Company, respect others' intellectual property rights, abide by the intellectual property laws applicable to our business locations, formulate relevant strategies, and establish specialized departments dedicated to intellectual property affairs.

我们应该怎么做？ How to do?

应全面识别和遵守所有适用的知识产权法规和公司政策。在与外部供应商和商业伙伴的合作过程中，要求其尊重第三方知识产权，在采购合同中需对相关知识产权情况做出合规性声明，并在必要时提供知识产权证明或许可文件，确保不侵犯任何第三方的知识产权；

All applicable intellectual property laws and company policies should be fully identified and complied



with. In the process of cooperation with external suppliers and business partners, they are required to respect third-party intellectual property rights, make compliance statements on relevant intellectual property rights in procurement contracts, and provide intellectual property certification or licensing documents when necessary to ensure that no third-party intellectual property rights are infringed.

谨慎处理第三方专有信息，确保不当使用，并根据许可协议合法使用计算机软件，遵守双方关于知识产权的承诺；

Handle third-party proprietary information carefully, ensure improper use, and use computer software legally in accordance with the Licensing Agreement, and comply with the commitments of both parties regarding intellectual property rights.

定期参加有关知识产权的培训，确保我们在日常工作中能够有效识别和避免潜在的知识产权侵权风险。

Regularly participate in training on intellectual property to ensure that we can effectively identify and avoid potential intellectual property infringing.

5.3.3.3 负责任信息管理 Responsible Information Management

5.3.3.3.1 定义 Definition

定义：个人信息是指以电子或者其他方式记录的与已识别或者可识别的自然人有关的各种信息；隐私是指自然人的私人生活安宁和不愿为他人知晓的私密空间、私密活动、私密信息；有关公司的一切信息，未经授权公开，均视为保密信息。

Definition: Personal information refers to various information related to identified or identifiable natural persons recorded electronically or in other ways; privacy refers to the private life peace of natural persons and the private space, private activities, and private information that they do not want others to know; all information about the company that is not authorized to be disclosed is considered confidential information.

合规准则 Compliance Standards:

我们保护员工、前员工、客户、供应商和其他相关方的个人信息和隐私，搭建个人信息保护体系，落实差异化数据保护措施，如组织员工签署承诺书、同意书等文件，在处理可能有重大影响的个人信息之前进行影响评估等；

We protect the personal information and privacy of employees, former employees, customers, suppliers and other relevant parties, build a personal information protection system, implement differentiated data protection measures, such as organizing employees to sign commitment letters, consent forms and other documents, and conducting impact assessments before processing personal information that may have a significant impact.

我们严格遵守业务所在地有关信息安全的法律法规，搭建信息安全管理体系统，部署数据防泄漏系统，以加密、监控和应急演练等形式加强信息安全保护；



We strictly abide by the laws and regulations on information security in our business location, establish an information security management system, deploy a data leakage prevention system, and strengthen information security protection through encryption, monitoring, and emergency drills.

我们对保密信息的交流始终保持谨慎的态度，采取保密措施确保所有员工重视保密信息的机密性。

We always maintain a cautious attitude towards the exchange of confidential information and take confidentiality measures to ensure that all employees value the confidentiality of confidential information.

我们应该怎么做？ How to do？

遵守各国数据保护相关规定，禁止违反法律法规收集、获取、存储和处理个人信息，不得刺探、侵扰、泄露、公开他人隐私；

Comply with relevant data protection regulations of various countries, prohibit the collection, acquisition, storage, and processing of personal information in violation of laws and regulations, and shall not pry, harass, disclose, or disclose the privacy of others.

保障信息的机密性、完整性、可用性、可验证性和可靠性，并防止未经授权的内部和外部访问；

Comply with relevant data protection regulations of various countries, prohibit the collection, acquisition, storage, and processing of personal information in violation of laws and regulations, and shall not pry, harass, disclose, or disclose the privacy of others.

因工作或职责接触到公司商业秘密的，始终对信息保密，未经授权，不得向第三方披露或提供商业秘密，不得在公开场所讨论、不得使用非保密通信工具传递商业秘密，因业务需要向第三方披露商业秘密时，应采取签订保密协议等措施防止泄密。

Those who come into contact with the company's confidential information due to work or responsibilities shall always keep the information confidential. Without authorization, they shall not disclose or provide trade secrets to third parties, discuss them in public places, or use non-confidential communication tools to transmit trade secrets. When disclosing trade secrets to third parties due to business needs, measures such as signing a Non Disclosure Agreement should be taken to prevent leakage.

5.3.3.4 违反商业道德政策惩戒措施 Disciplinary Measures For Violation Of Business Ethics Policy

a) 发现不当行为或收到举报时，按照《举报与调查制度》的规定开展调查，员工应充分配合并及时答复所有问询；

Upon discovery of misconduct or receipt of a report, investigations shall be conducted in accordance with the *Reporting and Investigation Policy*. Employees are required to fully cooperate and promptly respond to all inquiries;

b) 确认不当行为时，按照《举报与调查制度》进行报告，并提出适当的补救措施，包括但不限于惩戒措施、披露给有关当局或当事人、培训及其他纠正措施；



Upon confirmation of misconduct, reports shall be made as per the *Reporting and Investigation Policy*, and appropriate remedial measures shall be proposed. These measures may include but are not limited to disciplinary actions, disclosure to relevant authorities or parties, training, and other corrective actions;

c) 处罚根据相关法律和标准运营制度决定，包括口头警告、书面警告、记过、记大过、留职察看、降职、终止劳动合同。

Penalties shall be determined in accordance with relevant laws and operational standards, including verbal warnings, written warnings, records of misconduct, serious records of misconduct, probation, demotion, and termination of labor contracts.

5.3.3.5 审查机制 Review Mechanism

a) 举报与调查 Reporting and Investigation

任何人员有权对腐败、欺诈、共谋、胁迫和阻碍等不当行为、对供应链矿产开采、运输、贸易、处理、加工和出口（包括硅材料）方面等违背合规管理制度的情况进行举报。员工有义务及时向合规管理部门举报员工、管理人员、商业伙伴的所有不当行为或嫌疑。举报渠道如下：

Any individual has the right to report incidents of misconduct such as corruption, fraud, collusion, coercion, and obstruction, or violations of compliance management systems in the mining, transportation, trade, handling, processing and export of supply chain minerals (including silicon materials). Employees are obligated to promptly report any misconduct or suspicion involving employees, management personnel, or business partners to the Compliance Department. Reporting channels include:

(1) 举报热线：021-67777777-880080

Hotline: 021-67777777-880080

(2) 举报邮箱：compliance@chint.com

E-mail: compliance@chint.com

(3) 举报箱：合规部定期收集举报箱中的举报文件

Reporting box: Reports collected regularly by the Compliance Department from the reporting box.

(4) 其他渠道：员工可以自由选择其认为合适的其他渠道进行举报

Other channels: Employees are free to choose other appropriate channels for reporting.

合规管理部门获得举报信息后按照《举报与调查制度》开展合规调查。各单位管理层应在合规调查中向合规管理部门提供必要的工作条件及调查需要的所有信息，允许合规管理部门不受限制地接触必要的人员。

Upon receiving reports, the Compliance Department shall conduct investigations in accordance with the Reporting and Investigation System. The management of each department

must provide necessary work conditions and all required information during compliance investigations, allowing unrestricted access to necessary personnel by the Compliance Department.

合规管理部门应规范开展合规调查：坚持实事求是、客观公正、严格保密、保障权益、及时办理的工作原则。如合规调查中发现犯罪活动或其他不当行为，应向相关政府、执法或监管机构报告。

The Compliance Department shall conduct compliance investigations in a standardized manner, adhering to principles of truthfulness, objectivity, fairness, strict confidentiality, protection of rights, and timely processing. If criminal activities or other misconduct are discovered during compliance investigations, relevant government, law enforcement, or regulatory agencies shall be informed.

b) 合规审查 Compliance Review

合规管理部门考查商业道德政策的有效性，确保政策内容符合最新法规、国际标准或趋势，评估商业道德政策的执行情况，对合规事宜进行主动、全面的监督并判断合规风险。

The Compliance Department shall evaluate the effectiveness of the business ethics policy to ensure its alignment with the latest regulations, international standards, or trends. It shall actively and comprehensively supervise compliance matters and assess compliance risks.

合规管理部门定期审查商业道德政策在预防、发现、调查和应对各类不当行为方面的适用性、充分性和有效性，并向公司总裁班子及董事会报告。

The Compliance Department shall conduct regular reviews of the applicability, adequacy, and effectiveness of the business ethics policy in preventing, detecting, investigating, and addressing various forms of misconduct. These assessments shall be reported to the Board of Directors of the Group.

合规管理部门每年度对实施商业道德政策有效性进行评估。

The Compliance Department shall evaluate the effectiveness of implementing the business ethics policy annually.

c) 内部审核 Internal Audit

合规管理部门每 12 个月至少组织一次内部审核，通过对合规管理体系运行情况、目标实现情况、监管部门及相关方反馈信息等的分析，验证合规管理体系的符合性和有效性，以便及时发现问题，并采取纠正措施予以改进，确保管理体系持续有效运行。

The Compliance Department organizes an internal audit at least once every 12 months to verify the compliance and effectiveness of the compliance management system by analyzing the operation of the compliance management system, the achievement of goals, feedback information from regulatory authorities and relevant parties, etc., in order to timely discover problems, take corrective measures to improve, and ensure the continuous and effective operation of the management system.



5.3.3.6 合规政策与义务确认书 Confirmation of Compliance Policies and Obligations

正泰新能全体员工学习、理解并签署《合规与商业道德政策确认书》。模板如下：

All employees of Astronergy shall learn, understand and sign the *Confirmation of Compliance and Business Ethics Policy*. See the template as below:

合规与商业道德政策确认书

Confirmation of Compliance Policies and Obligations

收件人 Recipient: _____

发件人 Sender: 正泰新能科技股份有限公司 Chint New Energy Technology Co., Ltd.

主题: 正泰新能科技股份有限公司的合规与商业道德政策确认书

Subject: Confirmation of Compliance Policies and obligations of Chint New Energy Technology Co., Ltd.

本人已经收到、学习并理解了《正泰新能诚信合规商业行为准则》及公司其他诚信合规政策（以下简称“合规政策”），并且保证：作为本人当前和此后持续受雇于或者服务于正泰新能科技股份有限公司和/或其任何子公司（以下合称为“公司”）的前提条件之一，本人将完全遵守合规政策的要求。

I have received, studied, and understood *The Code of Integrity, Compliance and Business Conduct* and other compliance policies of the company (hereinafter referred to as the "Compliance Policies"), and guarantee that as one of the prerequisites for my current and future continuous employment or service with Chint New Energy Technology Co., Ltd. and/or any of its subsidiaries (hereinafter referred to as the "Company"), I will fully comply with the requirements of the Compliance Policies.

本人据此证明：在本人与公司存在关联的期间内，本人已经遵守了合规政策的要求。

I hereby certify that during the period of my association with the company, I have complied with the requirements of the Compliance Policies. And I agree to continue to comply with the requirements of the Compliance Policies in the future.

本人同意将来继续遵守合规政策。

And I agree to continue to comply with the requirements of the Compliance Policies in the future.

*《正泰新能诚信合规商业行为准则》及其他合规政策最新版本可在以下网址获取并阅读：

<https://www.astronergy.com.cn/faith/index.html>

*The latest version of the Compliance Policies can be accessed and read at: <https://www.astronergy.com/compliance/>

姓名 Name: _____

日期 Date: _____



5.4 可持续采购政策 Sustainable Procurement Policy

5.4.1 供应商环境、社会实践 Environmental And Social Practices of Suppliers

5.4.1.1 定义 Definition

供应商环境实践指：处理供应链中的环境问题，即供应商和承包商自己的业务和产品对环境产生的影响。

Supplier Environmental Practices: Deals with environmental issues within the supply chain i.e. environmental impacts generated from the suppliers and subcontractors own operations and products.

供应商社会实践指：处理供应链中的劳工和人权问题，即供应商和承包商自己的业务或产品产生的劳工和人权问题。

Supplier social Practices: Deals with labor practices and human rights issues within the supply chain i.e. labor practices and human rights issues generated from the suppliers and subcontractors own operations or products.

核心供应商：核心供应商必须满足以下 3 个条件：

Core suppliers: The core suppliers must meet the following three criteria:

- a) 与正泰新能合作连续三年以上的合格供应商；

Qualified suppliers who have cooperated with Astronergy for more than three consecutive years;

- b) 所属材料供应量占新能该材料总采购占比达到 5% 以上份额；

The supply of the material accounts for more than 5% of the total purchase of Astronergy;

- c) 所属材料占 BOM 成本 5% 以上，且材料所属行业具备一定技术壁垒

The material accounts for more than 5% of the BOM cost, and the industry of the material has certain technological barriers

不满足以上三个条件，但满足以下特殊项之一，可经过领导审批，加入核心供应商清单：

Suppliers who do not meet all three criteria but meet one of the following special conditions may be included in the core supplier list upon leadership approval:

- a) 与正泰有战略投资合作关系的供应商

Suppliers with strategic investment cooperation relationship with Astronergy

- b) 拥有特殊专利且对公司产品有重大影响的供应商

Suppliers with special patents that have a significant impact on the Company's products

5.4.1.2 定性承诺 Qualitative Commitments

通过可持续采购决策，减少对环境的影响，促进社会公平，并增强公司的竞争力。我们深刻认识到采购活动对环境、社会和经济的深远影响，并致力于将可持续性原则融入我们的企业采购决策中。

Through sustainable procurement decisions, we aim to reduce environmental impact, promote social equity, and enhance competitiveness of the Company. We recognize the profound influence of

procurement activities on the environment, society, and economy, and are committed to integrating sustainability principles into our corporate procurement decisions.

我们承诺不采购、不使用冲突矿产，鼓励供应商遵循《来自受冲突影响和高风险区域的矿产负责任供应链的尽职调查指南》（OECD Guidance）、负责任的矿产倡议（RMI）等国际公约，遵守《采掘业透明度倡议》（EITI）的原则，开展负责任矿产调查，确保不涉及争议性采购，同时鼓励供应商向其上游供应商传递此原则。我们致力于推动硅材料供应链的透明化与合规化，通过溯源体系建设、供应商分级管理、内外部审计等措施，实现供应链环境、社会与治理（ESG）绩效持续提升。

We commit not to purchasing or using conflict minerals and require our suppliers to strictly adhere to international conventions such as *the Due Diligence Guidelines for Responsible Supply Chains of Mineral from Conflict-Affected and High-Risk Areas (OECD)*, the Responsible Minerals Initiative (RMI), the principles of the Extractive Industry Transparency Initiative (EITI), and actively conduct responsible mineral investigations to ensure that no controversial procurement is involved, and suppliers are required to pass on this principle to their upstream suppliers. We are committed to enhancing transparency and compliance in the silicon material(module/cell/wafer/ingot/polysilicon/silicon powder/metallurgical grade silicon/quartz) supply chain. Through the establishment of traceability systems, tiered supplier management, and internal and external audits, we aim to achieve continuous improvement in Environmental, Social, and Governance (ESG) performance across the supply chain.

我们承诺积极携手供应商履行社会责任，致力于精进产业链的社会责任表现，推进业务与供应链的可持续发展。我们亦努力推动原材料的本地化采购。

We commit to collaborating actively with suppliers to fulfill social responsibilities, improve social responsibility performance across the industrial chain, and advance the sustainability of our business and supply chain. We also strive to promote localized procurement of raw materials.

5.4.1.3 定量目标 Quantitative Target

短期目标（至 2028 年）Short-term targets (By 2028)

- a) 100%核心供应商接受尽职调查审计和社会、环境标准评估

All core suppliers - Accept audits on due diligence and assessment in social, environmental aspects

- b) 每年对核心供应商开展能力建设培训

Annually - Conduct supplier training on ESG performance

- c) 100%不涉及冲突矿产采购及使用

100% Non-involvement in the procurement and use of conflict minerals

中长期目标（至 2035 年）Mid & Long-term targets (By 2035)

- a) 100% 核心供应商通过 ISO 45001 认证

All core suppliers - Obtain ISO 45001 Certification

- b) 100% 核心供应商通过 ISO 14001 认证



All core suppliers - Obtain ISO 14001 Certification

c) 100% 高风险二级供应商接受尽职调查审计

All high-risk secondary suppliers - 100% accept due diligence audits

5.4.1.4 审查机制 Review Mechanism

a) 在供应商准入阶段，按照《生产性物资供应商信息调查表》、《知识产权状况调查表》、《商业伙伴尽职调查问卷表》对其进行尽职调查，了解供应商基础信息、合规控制与遵守、合规核对事项，确保供应商满足 ESG 及合规要求，不在受冲突影响和高风险地区（CAHRA）开展业务。触及 CSR 红线的，不予导入，按退出供应商管理。供方管理部门审核相关资料，通过天眼查和国家企业信用信息公示系统等平台，利用线上审查，该公司是否有司法风险及经营风险中是否有涉及红线相关内容，如劳务纠纷、重大过失死亡事件等。利用国家企业信用信息公示系统审核供方是否存在于经营异常或严重违法失信名录中。如有，按照《供应商管理办法》文件的要求进行处理。

During the supplier onboarding phase, due diligence shall be conducted in accordance with the Supplier Information Questionnaire for Productive Materials, Intellectual Property Status, and Business Partner Due Diligence Questionnaire. This process aims to obtain information on the supplier's basic details, compliance control and adherence, as well as compliance verification items, ensuring the supplier meets ESG and compliance requirements and does not conduct business in Conflict-Affected and High-Risk Areas (CAHRA). Suppliers that violate CSR red lines will not be onboarded and will be managed through supplier exit procedures. The Supplier Management Department shall review relevant documentation, utilize platforms like Tianyancha and the National Enterprise Credit Information Publicity System for online scrutiny to assess judicial and operational risks such as labor disputes and major incidents, and utilize the National Enterprise Credit Information Publicity System to verify if suppliers are listed for abnormal business operations or serious breaches of trust. In case of any identification, it shall handle according to the requirements outlined in the *Supplier Management Measures*.

b) 资格预审，对其提供的调查问卷、REACH 等相关资质证书、背景调研资料进行汇总整理，是否符合我司标准，标准参见《管理供应商准入》，通过《供应商准入审核评分表》对供应商开展包括环境保护、职业健康与安全、社会责任因素、冲突矿产的准入审核。预审通过的，组织供应商准入审核，针对 ESG 部分，设置审核项目，要求供应商在环境保护、职业病管理、安全消防、社会责任等方面建立规范的体系，标准参见《管理供应商准入》要求，针对不符合项要求供应商及时整改，必要时对其进行帮扶。未限期整改或整改不符合的，取消准入资格，触及 CSR 红线的立即停止开发流程，按退出供应商管理。准入完成的供应商在签署框架合同时，须同步签署《正泰商业伙伴诚信合规行为准则》及《诚信合规廉洁承诺书》，以及安全供货承诺书、环保禁用物资承诺等文件，遵守诚信合规、商业道德、健康安全、劳工与人权、冲突矿产、环境保护等方面的条款规定，承诺切实履行社会责任。

Conduct qualification pre-audits, consolidating and reviewing questionnaires, REACH

certifications, and background investigation materials provided by suppliers to assess compliance with our standards as outlined in the *Supplier Admission Management*. We conduct qualification reviews of suppliers using the *Supplier Entry Audit Score Sheet*, including factors such as environmental protection, occupational health and safety, social responsibility, and conflict minerals. If pre-audit criteria are met, organize supplier admission audits focusing on ESG criteria. Require suppliers to establish standardized systems for environmental protection, occupational disease management, safety and fire protection, and social responsibility, as per the *Supplier Admission Management*. Suppliers failing to meet requirements must promptly rectify deficiencies, with necessary assistance provided when needed. Suppliers failing to rectify within the stipulated period or adequately comply will have their admission revoked. Immediate cessation of development processes will occur for those breaching CSR guidelines, managed through supplier exit protocols. Suppliers that have completed admission must, upon signing framework contracts sign documents including *Chint Business Partner Code of Conduct*, *Business Partner Integrity and Compliance Undertakings*, *Safe Supply Commitment*, and *Environmental Protection Prohibited Materials Commitment*, ensuring adherence to provisions regarding integrity and compliance, business ethics, health and safety, labor and human rights, conflict minerals, and environmental protection, and commit to fulfilling social responsibilities.

c) 在供应商日常管理中，依据《管理供应商稽核》规定，定期对主要原材料供应商开展包含环境影响评估、企业社会责任（CSR）评估的供应商现场稽核，监督供应商履约问题。基于《管理供应商风险》对供应商风险进行识别、评估、控制和监测，保障供应链可持续发展。针对 ESG 风险，根据风险系数，采取对应策略，涉及高风险的，冻结供应商供货资格，涉及 CSR 红线的，做退出处理；对合格供应商定期稽核，涵盖 ESG 部分审核项目，审核频次及覆盖范围见《管理供应商稽核》。

In daily supplier management, according to the *Supplier Audit Management*, regular on-site audits of key raw material suppliers are conducted, including environmental impact assessments and corporate social responsibility (CSR) assessments, supervise performance issues. Based on the Supplier Risk Management, we identify, assess, control, and monitor supplier risks to ensure the sustainable development of the supply chain, taking corresponding measures based on ESG risk factors. Suppliers posing high risks will have their supply qualifications frozen, while those breaching CSR guidelines will undergo exit procedures. Conduct regular audits of qualified suppliers, encompassing ESG audit items. Refer to the *Supplier Audit Management* for audit frequency and scope.

d) 在供应商绩效管理，依据《管理供应商绩效》制度，规范供应商绩效考核流程，明确供应商绩效考核标准，促进供应商持续改善。为推进绿色供应链管理制度，实现双碳目标，特设立年度绩效考核加分项，作为年度评选优秀供应商的重要依据，督促供应商节能减排，推动低碳转型。

In supplier performance management, based on the Supplier Performance Management, we standardize the supplier performance evaluation process, clarify performance assessment criteria, and promote continuous improvement among suppliers. To advance the green supply chain



management system and achieve carbon neutrality goals, we have established annual performance evaluation bonus points, and established Green Supplier Evaluation Metrics as a crucial criterion for annual selection of outstanding suppliers. Encourage suppliers to achieve energy conservation and emission reduction goals, promoting a shift towards low-carbon practices.

6 政策审查与更新 Document Updating

1) 本文件由正泰新能科技股份有限公司负责解释、审查和修订。公司每三年会根据国内外政策、最新法律法规、国际标准、监管要求和行业趋势，结合与利益相关方的沟通反馈开展正式政策审查，并每年结合公司运营实际情况进行政策内容更新。

This document is interpreted, reviewed and revised by Chint New Energy Technology Co.,Ltd. Every three years, the Company conducts a formal policy review based on national and overseas policies, the latest laws and regulations, international standards, regulatory requirements and industry trends, combined with communication and feedback from stakeholders, and updates the policy content annually in light of the actual situation of the Company's operations.

2) 政策更新审批流程：

Policy review, update and approval process:

- a) 根据国内外政策、最新法律法规、国际标准、监管要求和行业趋势，可持续发展部收集各部门及利益相关方沟通反馈建议，建议中应包含修订的原因、必要性说明、具体条款的修改建议；

Based on domestic and international policies, the latest laws and regulations, international standards, regulatory requirements and industry trends, the Sustainability Department collects feedback from various departments and stakeholders, which should include the reasons for the revision, explanation of the necessity, and suggestions for modification of specific provisions.

- b) 可持续发展部对建议内容合理性进行预评估，评估修改影响范围，风险和实施难度，并提出修改意见；

The Sustainability Department pre-evaluates the reasonableness of the proposal, assesses the scope of impact, risk and difficulty of implementation, and proposes modifications.

- c) 相关部门或人员综合修改意见起草修订稿

Consolidation of changes and drafting of revisions by relevant departments or personnel.

- d) 管理层正式审批签发

Formal approval and issuance by management.

- e) 在公司内部及官网发布以供内外部利益相关方阅览。

Publish it internally and on the company's website for internal and external stakeholders to read.



3) 若本文件中英文版本存在差异，请以中文版本为准。

In case of any inconsistency between the Chinese and English versions of the document, the Chinese version shall prevail.