

商业道德政策 Business Ethics Policy

为响应全球新能源行业可持续发展趋势、履行企业社会责任，规范经营管理、维护行业秩序，固德威技术股份有限公司（以下简称“公司”）制定本政策。

我们郑重承诺：将商业道德融入核心管理体系，严格遵循行业法规与商业伦理，杜绝商业贿赂、利益输送、数据造假、不正当竞争，对违规行为“零容忍”；尊重员工合法权益，保障合作伙伴权益，营造公平诚信、责任共担、包容共赢的环境，助力全球能源变革。

本政策适用于固德威技术股份有限公司及合并财务报表的分、子公司，并要求供应商、服务商、承包商及其他主要业务合作伙伴积极遵守此政策或同等政策要求。

In response to the global sustainable development trend of the new energy industry and fulfill corporate social responsibilities, GoodWe Technologies Co., Ltd. (hereinafter referred to as the "Company") formulates this policy to standardize business management and maintain industry order. We solemnly pledge to integrate business ethics into the core management system, strictly abide by industry regulations and business ethics, eliminate commercial bribery, interest transfer, data fraud, and unfair competition, and have a "zero - tolerance" attitude towards violations; respect the legitimate rights of employees, protect the rights and interests of partners, create a fair, honest, responsibility - sharing, inclusive and win - win environment, and contribute to the global energy transformation.

This policy applies to GoodWe Technologies Co., Ltd. and its branches and subsidiaries included in the consolidated financial statements. Suppliers, service providers, contractors, and other major business partners are required to actively comply with this policy or equivalent policy requirements.

职责治理与责任分配

Responsibility Governance and Liability Allocation

公司建立“董事会-ESG 战略与管理委员会-ESG 执行层”的三级商业道德治理体系，确保政策有效落地。

The company has established a three - level business ethics governance system of "Board of Directors - ESG Strategy and Management Committee - ESG Executive Level" to ensure the effective implementation of policies.

董事会负责审批商业道德政策及年度战略目标；监督管理层对政策的执行与落实情况；审议商业道德重大事项及资源配置方案。

The board of directors is responsible for approving the business ethics policy and annual strategic goals, supervising the management's implementation and enforcement of the policy, and reviewing major business ethics issues and resource allocation plans.

管理层（CEO 及分管副总）负责制定商业道德年度实施计划；协调跨部门资源，解决政策执行中的重大问题；

向董事会汇报商业道德绩效及改进方向。

The management (CEO and deputy general managers in charge) is responsible for formulating the annual implementation plan for business ethics; coordinating cross - departmental resources to solve major problems in policy implementation; and reporting business ethics performance and improvement directions to the board of directors.

供应链 ESG 合规管理部门负责牵头政策的制定、修订与解读；建立商业道德评价指标体系，开展绩效评估；参与供应商商业道德绩效审核，提供质量合规维度评估意见。

The Supply Chain ESG Compliance Management Department is responsible for leading the formulation, revision, and interpretation of policies; establishing a business ethics evaluation index system and conducting performance evaluations; participating in the review of suppliers' business ethics performance and providing evaluation opinions from the quality compliance dimension.

采购部门作为政策执行部门，将可持续要求融入采购全流程；实施供应商筛选、准入、考核及动态管理；推动采购数据与 ESG 管理系统对接，确保信息透明；负责验证供应商产品合规性，排查因数据造假、偷工减料导致的质量问题。

As a policy - implementing department, the procurement department integrates sustainable requirements into the entire procurement process; implements supplier screening, access, assessment, and dynamic management; promotes the connection between procurement data and the ESG management system to ensure information transparency; and is responsible for verifying the compliance of suppliers' products and investigating quality problems caused by data falsification and cutting corners.

供应链管理部门负责在物流、仓储等环节落实商业道德要求，防范利益输送、不正当合作；协助收集供应商商业道德履约数据；推动供应链协同平台新增合规监督功能。

The supply chain management department is responsible for implementing business ethics requirements in logistics, warehousing and other aspects, and preventing interest transfer and improper cooperation; assisting in collecting data on suppliers' compliance with business ethics; and promoting the addition of compliance supervision functions to the supply chain collaboration platform.

法务部负责处理商业道德相关的法律纠纷（如商业贿赂引发的诉讼）；识别政策执行中的合规风险，提供法律支持。

The legal department is responsible for handling legal disputes related to business ethics (such as lawsuits arising from commercial bribery); identifying compliance risks in policy implementation and providing legal support.

腐败贿赂

Corruption and bribery

a. 核心承诺 Core commitment

我们坚决反对任何形式的腐败与贿赂行为，对此类行为秉持“零容忍”态度，具体涵盖但不限于行贿、受贿、索贿、回扣、佣金等不正当行为，保障光伏逆变器研发、储能设备生产、全球供应链合作等全业务环节的合规性。

We firmly oppose any form of corruption and bribery and maintain a "zero-tolerance" attitude towards such behaviors. Specifically, this includes but is not limited to improper acts such as offering bribes, accepting bribes, extorting bribes, kickbacks, and commissions, ensuring compliance in all business processes including photovoltaic inverter R & D, energy storage equipment production, and global supply chain cooperation.

强化员工教育，定期开展反腐败与反贿赂专项培训，结合新能源行业案例（如供应链采购、海外市场拓展场景），提升员工对相关行为危害性的认知，增强自我约束能力。

Strengthen employee education and conduct regular special training on anti-corruption and anti-bribery. Combine with new energy industry cases (such as supply chain procurement and overseas market expansion scenarios) to enhance employees' awareness of the harm of relevant behaviors and strengthen their self-restraint ability.

鼓励员工参与监督，设立内部举报机制（如合规热线、线上通道），为举报人提供必要的保护与支持，保障监督渠道畅通，确保问题及时发现与处理。

Encourage employees to participate in supervision, establish an internal reporting mechanism (such as a compliance hotline and online channels), provide necessary protection and support for whistle-blowers, ensure the smooth operation of supervision channels, and guarantee the timely discovery and handling of problems.

b. 案例说明 Case description

合规案例：海外市场客户经理在与某国代理商洽谈光伏储能逆变器代理合作时，对方提出私下赠送当地房产份额以争取独家代理资格，该员工当场拒绝，并第一时间将情况同步至公司合规部门，最终通过正常商务谈判达成合作，维护了公司合规形象。

Compliance case: When a customer manager for the overseas market was discussing a cooperation on the agency of photovoltaic energy storage inverters with an agent from a certain country, the agent proposed to privately offer a share of local real estate to secure the exclusive agency right. The employee immediately refused and reported the situation to the company's compliance department at the first time. Eventually, cooperation was reached through normal business negotiations, maintaining the company's compliant image.

违规案例：供应链采购部员工负责光伏逆变器核心芯片采购时，主动向供应商提出“按采购金额 5%提取返点”的要求，后续在供应商满足返点条件后，优先选择其产品，且未按规定进行比价。此行为已构成受贿，违反公司反腐败政策，公司依规对该员工进行辞退处理，并终止与涉事供应商的合作。

Violation case: When an employee in the Supply Chain Procurement Department was responsible for the procurement of core chips for photovoltaic inverters, they actively asked the supplier for a "5% rebate based on the procurement amount." Subsequently, after the supplier met the rebate condition, the employee gave priority to selecting its products and did not conduct price comparisons as required. This behavior constitutes bribery and violates the company's anti - corruption policy. The company has dismissed the employee in accordance with regulations and terminated cooperation with the involved supplier.

c. 目标指标 Target indicators

以 2023 年为基准年，员工反腐败与反贿赂合规培训覆盖率达 100%，至 2030 年培训考核合格率≥95%。

以 2023 年为基准年，持续保持举报机制落地效果：举报 2 个工作日内受理、15 个工作日内反馈进展，100% 保护举报人信息，杜绝打击报复。

以 2023 年为基准年，至 2030 年实现风险管控目标：年度腐败贿赂违规案件 0 起，新增合作方（含供应商、代理商）合规筛查率 100%，高风险部门（采购部、海外市场部）年度专项审计≥2 次。

Taking 2023 as the base year, the coverage rate of anti - corruption and anti - bribery compliance training for employees has reached 100%. By 2030, the pass rate of the training assessment should be ≥95%.

Taking 2023 as the base year, continuously maintain the implementation effect of the reporting mechanism: accept reports within 2 working days, provide progress feedback within 15 working days, protect the information of reporters 100%, and eliminate retaliation.

Taking 2023 as the base year, achieve the risk management and control goals by 2030: zero annual corruption and bribery violation cases, 100% compliance screening rate for new cooperation partners (including suppliers and agents), and at least 2 annual special audits for high - risk departments (Procurement Department and Overseas Marketing Department).

利益冲突

Conflict of interest

a. 核心承诺 Core commitment

公司向全体员工、客户及合作伙伴承诺，严格规范利益冲突管理，保障光伏逆变器研发、储能项目合作、全球供应链运营等业务的公正合规。

The company promises all employees, customers, and partners that it will strictly regulate conflict-of-interest management to ensure fairness and compliance in businesses such as photovoltaic inverter R

& D, energy storage project cooperation, and global supply chain operations.

健全管理机制，严禁员工利用职务便利或公司资源（如技术数据、客户资源、采购决策权）谋取私利，严禁向亲属、关联企业转移公司机密或业务机会。

Improve the management mechanism. Employees are strictly prohibited from using their position advantages or company resources (such as technical data, customer resources, and procurement decision-making power) for personal gain, and from transferring company secrets or business opportunities to relatives or affiliated enterprises.

提供针对性合规培训与指引，结合新能源行业场景（如供应商合作、海外代理商管理），监督员工在业务中主动规避利益关联，保持决策公正客观。

Provide targeted compliance training and guidance, combine with new energy industry scenarios (such as supplier cooperation and overseas agent management), and supervise employees to actively avoid interest associations in business and maintain fair and objective decision-making.

畅通利益关联申报渠道（如线上申报系统、合规专员对接），对员工申报信息严格保密，及时协助制定规避方案，防范冲突风险。

Establish unobstructed channels for reporting interest relationships (such as online reporting systems and communication with compliance officers), strictly keep employees' reported information confidential, and promptly assist in formulating avoidance plans to prevent conflict risks.

b. 案例说明 Case description

合规案例：市场部员工的配偶就职于公司合作的海外储能项目代理商，该员工在接到与该代理商的年度合作谈判需求后，第一时间向部门负责人及合规部门申报关联关系，并申请由其他同事对接该项目，全程未参与相关决策，有效规避利益冲突。

Compliance case: The spouse of an employee in the marketing department works for an overseas energy storage project agent that the company cooperates with. After receiving the demand for the annual cooperation negotiation with this agent, the employee reported the related relationship to the department head and the compliance department immediately, and applied for other colleagues to handle the project. The employee did not participate in relevant decision-making throughout the process, effectively avoiding conflicts of interest.

违规案例：技术部主管私下持有某光伏逆变器软件供应商 15% 股份，在公司推进智能控制软件升级项目时，未申报该持股情况，反而在技术评审中刻意抬高该供应商的兼容性、稳定性评分，最终推动公司与其签订百万级采购合同。此行为违反利益冲突管理政策，公司依规对其降职处理，并重新启动项目招标。

Violation case: The head of the technical department privately holds 15% of the shares of a photovoltaic inverter software supplier. When the company promoted the intelligent control software upgrade project, he failed to declare his shareholding. Instead, he deliberately inflated the

compatibility and stability scores of the supplier during the technical review, and finally pushed the company to sign a million-level procurement contract with it. This behavior violates the conflict-of-interest management policy. The company demoted him in accordance with regulations and restarted the project tender.

c. 目标指标 Target indicators

以 2023 年为基准年，年度全员利益冲突合规培训覆盖率 100%；至 2030 年员工利益关联主动申报率≥98%。
以 2023 年为基准年，高风险部门（采购部、技术部、海外市场部）每年度开展利益冲突专项排查，覆盖率 100%；至 2030 年年度利益冲突违规案件 0 起。

Taking 2023 as the base year, the coverage rate of annual full - staff compliance training on conflicts of interest is 100%; by 2030, the voluntary reporting rate of employees' interest associations should be ≥98%.

Taking 2023 as the base year, high - risk departments (Procurement Department, Technology Department, Overseas Market Department) shall conduct special investigations on conflicts of interest annually, with a coverage rate of 100%; by 2030, the number of annual cases of violations of conflict - of - interest regulations should be zero.

禁止洗钱

Money laundering prohibited

a. 核心承诺 Core commitment

公司承诺全面遵守国家及业务覆盖国（地区）的反洗钱法律法规，坚决抵制任何形式的洗钱活动，维护新能源行业资金安全与公司声誉。

The company promises to fully comply with the anti-money laundering laws and regulations of the country and the countries (regions) where its business covers, resolutely resist any form of money laundering activities, and safeguard the capital safety of the new energy industry and the company's reputation.

强化客户（含海外代理商、大型储能项目客户）与供应商身份识别与核实，建立完善的信息档案，确保名称、资质、资金来源等信息真实、完整。

Strengthen the identification and verification of the identities of customers (including overseas agents and large-scale energy storage project customers) and suppliers, establish a comprehensive information file, and ensure that information such as names, qualifications, and sources of funds is true and complete.

定期开展员工反洗钱教育与培训，结合新能源行业大额资金交易场景（如光伏电站项目结算、海外设备采购付款），提升员工对洗钱行为的识别、防范能力，强化法律意识与职业道德。

Conduct regular anti-money laundering education and training for employees. Combining with the

large-value fund transaction scenarios in the new energy industry (such as settlement of photovoltaic power station projects and payment for overseas equipment procurement), improve employees' ability to identify and prevent money laundering activities, and strengthen their legal awareness and professional ethics.

b. 案例说明 Case description

合规案例：采购部在办理某海外供应商的光伏逆变器核心部件采购结算时，发现对方提供的银行账户开户人名称与营业执照主体不一致，且资金来源标注为“个人借款”，立即暂停付款流程，启动二次身份核验，要求对方补充股权关系证明、资金用途说明等材料，确认无异常后才能完成支付，严格落实反洗钱要求。

Compliance case: When the procurement department was handling the procurement settlement of the core components of photovoltaic inverters from an overseas supplier, it found that the name of the account holder of the bank account provided by the supplier was inconsistent with the entity on the business license, and the source of funds was marked as "personal loan". It immediately suspended the payment process, initiated a second identity verification, and required the supplier to provide supplementary materials such as proof of equity relationship and explanation of fund usage. Payment could only be completed after confirming that there were no abnormalities, strictly implementing anti - money laundering requirements.

违规案例：财务部员工在处理某企业客户的多笔“隔日进、隔日出”短期资金交易时，发现该客户每月有 3-5 笔大额资金转入公司账户，次日即以“合同终止退款”名义转出，且资金用途描述模糊（仅标注“往来款”）。该员工明知交易频率、金额异常，却未按规定上报合规部门，违反公司反洗钱政策，公司依规对其通报批评并扣除季度绩效。

Violation case: When handling multiple short-term "next-day deposit, next-day withdrawal" fund transactions of an enterprise client, an employee in the Finance Department noticed that the client transferred 3 - 5 large - sum funds to the company's account each month and then transferred them out the next day under the pretext of "refund due to contract termination", with the description of the fund usage being vague (only marked as "current account funds"). Although the employee was aware that the transaction frequency and amount were abnormal, he/she failed to report to the compliance department as required, thus violating the company's anti - money laundering policy. The company duly criticized the employee in public and deducted their quarterly performance bonus.

c. 目标指标 Target indicators

以 2023 年为基准年，年度反洗钱合规培训覆盖全体员工，覆盖率 100%；至 2030 年反洗钱合规岗位（财务部、采购部、海外业务部）人均年度培训时长达到 6 小时，考核合格率 100%。

Taking 2023 as the base year, annual anti - money laundering compliance training covers all employees, with a coverage rate of 100%. By 2030, the average annual training hours per person in

anti - money laundering compliance positions (Finance Department, Purchasing Department, Overseas Business Department) will reach 6 hours, and the passing rate of the assessment will be 100%.

禁止欺诈

Fraud is prohibited

a. 核心承诺 Core commitment

公司承诺秉持诚实、公正、透明的经营原则，坚决抵制任何形式的欺诈行为，涵盖财务欺诈、合同欺诈、产品数据欺诈等类型，保障光伏逆变器研发、储能项目合作、全球市场运营的合规性。

The company promises to adhere to the business principles of honesty, fairness, and transparency, and firmly resist any form of fraud, including financial fraud, contract fraud, product data fraud, etc., to ensure the compliance of R & D of photovoltaic inverters, cooperation in energy storage projects, and global market operations.

构建完善的反欺诈管理体系，针对新能源行业特性制定严格的内部控制流程（如研发数据核验、采购合同审核）与监督机制，确保全流程信息真实可追溯。

Build a comprehensive anti - fraud management system, formulate strict internal control processes (such as verification of R & D data and review of procurement contracts) and supervision mechanisms according to the characteristics of the new energy industry to ensure that the information in the whole process is real and traceable.

加强员工反欺诈教育与培训，结合行业案例（如虚假产能申报、研发数据造假），提升员工对欺诈行为的认知度和防范意识，强化合规责任感。

Strengthen employee education and training on anti-fraud. Combine industry cases (such as false production capacity declarations and R & D data falsification) to enhance employees' awareness and prevention ability of fraud and strengthen their sense of compliance responsibility.

b. 案例说明 Case description

合规案例：研发部门员工在整理光伏逆变器户外效率测试数据时，发现部分高温环境下的样本数据存在偏差，未隐瞒问题，第一时间向部门负责人及合规部门汇报，配合开展补充测试与数据校准，最终提交真实完整的研发报告，符合反欺诈要求。

Compliance case: When organizing the outdoor efficiency test data of photovoltaic inverters, an employee in the R & D department found that there were deviations in some sample data under high-temperature environments. Without concealing the problem, the employee reported it to the department head and the compliance department immediately, and cooperated in conducting supplementary tests and data calibration. Finally, a true and complete R & D report was submitted, which met the anti - fraud requirements.

违规案例：销售部门员工为达成季度业绩指标，向某工商业储能项目客户推销设备时，故意隐瞒设备在低温环境下的续航衰减问题，并夸大其年发电增益率，诱导客户签订百万级采购合同。后续客户因设备性能不达标提出索赔，该行为构成商业欺诈，违反公司反欺诈政策。

Violation case: To meet the quarterly performance targets, an employee in the sales department deliberately concealed the issue of battery life attenuation of the equipment in low-temperature environments and exaggerated its annual power generation gain rate when promoting the equipment to a customer of an industrial and commercial energy storage project, inducing the customer to sign a procurement contract worth millions. Subsequently, the customer filed a claim due to the substandard performance of the equipment. This behavior constitutes commercial fraud and violates the company's anti-fraud policy.

c. 目标指标 Target indicators

以 2023 年为基准年，年度反欺诈合规培训覆盖全体员工，覆盖率 100%；至 2030 年欺诈知识人均年度培训时长达到 6 小时，考核合格率 100%。

Taking 2023 as the base year, the annual anti - fraud compliance training covers all employees with a coverage rate of 100%. By 2030, the average annual training duration of fraud knowledge per person will reach 6 hours, and the passing rate of the assessment will be 100%.

信息安全 Information Security

a. 核心承诺 Core commitment

公司承诺建立健全信息安全管理体系统，结合新能源行业数据特性（如客户电站运行数据、核心研发技术），确保信息安全政策、制度及操作规范全面贯彻执行。

The company promises to establish and improve an information security management system. Considering the data characteristics of the new energy industry (such as the operation data of customers' power stations and core R & D technologies), it ensures the full implementation of information security policies, systems, and operating specifications.

严格保护客户（如电站业主）、员工及公司的机密信息，防范信息泄露、滥用、篡改或非法获取，重点保障光伏逆变器核心算法、储能项目方案、全球客户数据等信息资产安全。

It strictly protects the confidential information of customers (such as power station owners), employees, and the company, preventing information leakage, abuse, tampering, or illegal access. It focuses on safeguarding information assets such as the core algorithms of photovoltaic inverters, energy storage project plans, and global customer data.

要求全体员工遵守信息安全政策与操作规范，从人员权限管理、系统防火墙防护、数据加密处理等维度，确保信息安全工作有效落地。

All employees are required to abide by information security policies and operating specifications. From aspects such as personnel access management, system firewall protection, and data encryption processing, it ensures the effective implementation of information security work.

b. 案例说明 Case description

合规案例：IT 部门员工按季度对公司核心服务器（含研发数据服务器、客户运维系统服务器）进行漏洞扫描，发现某储能项目管理系统存在高危漏洞后，24 小时内完成补丁修复，并组织各业务部门开展账号密码安全专项培训，规范员工数据存储与系统操作流程，有效防范安全风险。

Compliance case: Employees in the IT department conduct quarterly vulnerability scans on the company's core servers (including R & D data servers and customer operation and maintenance system servers). After discovering a high-risk vulnerability in an energy storage project management system, they complete patch repairs within 24 hours. They also organize special training on account password security for each business department to standardize employees' data storage and system operation processes, effectively preventing security risks.

违规案例：市场部员工离职前，利用工作权限将公司核心客户（如海外分布式电站运营商）的联系方式、项目报价单、未公开的储能解决方案等商业秘密，拷贝至私人移动硬盘。入职竞争对手公司后，使用该信息抢夺原公司客户，导致公司损失超千万订单，此行为构成严重信息泄露，违反公司信息安全政策。

Violation case: Before leaving the company, an employee in the marketing department used work permissions to copy trade secrets such as the contact information of the company's core customers (e.g., overseas distributed power station operators), project quotations, and unpublished energy storage solutions to a personal mobile hard drive. After joining a competing company, the employee used this information to poach the original company's customers, causing the company to lose orders worth over ten million. This behavior constitutes a serious information leak and violates the company's information security policy.

c. 目标指标 Target indicators

以 2023 年为基准年，核心信息系统（如客户电站运维系统、研发数据管理系统、财务系统）漏洞扫描频率不低于每季度 1 次，高危漏洞修复时效 ≤ 24 小时，修复率 100%。

Taking 2023 as the base year, the core information systems (such as the customer power station operation and maintenance system, R & D data management system, and financial system) should be scanned for vulnerabilities at least once a quarter. The repair time limit for high - risk vulnerabilities should be ≤ 24 hours, and the repair rate should be 100%.

以 2023 年为基准年，开展全员信息安全专项培训，培训覆盖率 100%；培训后组织安全意识考核，员工合格率 $\geq 95\%$ ，未合格者需补考至通过。

Taking 2023 as the base year, conduct a special information security training for all employees, with a

training coverage rate of 100%. After the training, organize a security awareness assessment. The pass rate of employees should be $\geq 95\%$. Those who fail need to retake the exam until they pass.

以 2023 年为基准年，至 2030 年每年至少开展 1 次信息安全管理体系内部审计，关键业务系统合规检查覆盖率 100%，发现合规问题整改完成率 100%。

Taking 2023 as the base year, conduct at least one internal audit of the information security management system every year until 2030. The compliance inspection coverage rate of key business systems should be 100%, and the completion rate of rectification for discovered compliance issues should be 100%.

政策更新与审查机制

Policy Update and Review Mechanism

供应链 ESG 合规管理部门牵头，每年第四季度对政策执行情况进行全面评估，报管理层审议后向董事会汇报。以 3 年为一个周期，由 ESG 管理部联合法务部、内审部等部门，结合国家法规更新、国际合规要求变化、行业实践发展及公司战略调整，对政策进行全面修订与完善，修订方案需经董事会审批后生效。

Led by the Supply Chain ESG Compliance Management Department, a comprehensive assessment of policy implementation will be conducted in the fourth quarter of each year. After being reviewed by the management, the results will be reported to the board of directors. With a three - year cycle, the ESG Management Department, in collaboration with the Legal Department, the Internal Audit Department and other departments, will comprehensively revise and improve the policies in light of updates to national regulations, changes in international compliance requirements, development of industry practices and adjustments to the company's strategy. The revised plan will come into effect after being approved by the board of directors.

出现以下情形之一时，应启动政策紧急更新程序：

The policy emergency update procedure shall be initiated when one of the following situations occurs:

- 相关国家法律法规或国际合规要求发生重大变化；
- Significant changes occur in relevant national laws, regulations, or international compliance requirements;
- 公司业务范围、供应链结构出现重大调整；
- Significant adjustments are made to the company's business scope or supply chain structure;
- 发生重大商业道德风险事件，暴露政策漏洞；
- A major business ethics risk event occurs, exposing policy loopholes;
- 董事会提出政策修订要求。
- The board of directors requests a policy revision.

紧急更新流程应在相关触发事件发生后 30 个工作日内完成评估，90 个工作日内形成修订方案并报批。

政策发布或更新后，ESG 管理部需在 30 个工作日内组织内部采购相关部门及核心供应商开展宣贯培训，确保相关方充分理解政策要求。培训材料及记录需归档留存。

The emergency update process shall complete the assessment within 30 working days after the occurrence of the relevant triggering event, and formulate a revision plan and submit it for approval within 90 working days.

After the policy is issued or updated, the ESG Management Department shall organize internal procurement - related departments and core suppliers to conduct publicity and training within 30 working days to ensure that relevant parties fully understand the policy requirements. Training materials and records shall be archived and retained.

申诉举报机制

Appeal and reporting mechanism

为保障公司商业道德政策等各项管理制度的有效执行，鼓励员工、供应商及利益相关方对违规行为进行监督；对商业活动中违反本政策的行为举报，包括但不限于：

To ensure the effective implementation of the company's management systems such as the business ethics policy, employees, suppliers and stakeholders are encouraged to supervise violations. Report any violations of this policy in business activities, including but not limited to:

- 员工收受回扣、泄露招标信息等廉洁问题；
- Integrity issues such as employees accepting kickbacks and leaking tender information;
- 存在环境违规、劳工权益侵害、商业欺诈等问题未被处理；
- There are unaddressed issues such as environmental violations, labor rights infringements, and commercial fraud;
- 政策执行过程中存在徇私舞弊、故意刁难员工和供应商等行为。
- There are acts such as favoritism and deliberately making things difficult for employees and suppliers during policy implementation.

公司设立多元化、保密的申诉举报渠道，相关信息在公司官网、供应商门户及办公区域显著位置公布：

The company has established diversified and confidential channels for complaints and reports, and the relevant information is announced on the company's official website, supplier portal, and prominent locations in the office area:

申诉举报专用邮箱：GOODWE-Inform@goodwe.com

Dedicated email for complaints and reports: GOODWE-Inform@goodwe.com

申诉举报专用电话：0512-62396791

Dedicated phone for complaints and reports: 0512 - 62396791

公司严禁对申诉举报人进行打击报复，对因申诉举报受到不公平对待的相关方，经核实后将依法依规予以纠正，并对相关责任人进行严肃处理。

The company strictly prohibits retaliation against complainants and reporters. For relevant parties who have been treated unfairly due to complaints and reports, after verification, corrections will be made in accordance with laws and regulations, and relevant responsible persons will be seriously dealt with.

惩戒

Punishment

对于违反本商业道德政策的行为，公司将根据情节轻重采取以下惩戒措施：

For acts that violate this business ethics policy, the company will take the following disciplinary measures according to the severity of the circumstances:

对于情节较轻的违规行为，公司将给予当事人口头警告或书面警告，并责令其在规定期限内改正。

For minor violations, the company will give the person involved an oral or written warning and order them to make corrections within a specified time limit.

对于情节较重的违规行为，公司将视情况对当事人作出降职、降薪或停职等处分。

For more serious violations, the company will, depending on the circumstances, impose disciplinary actions such as demotion, salary reduction or suspension on the person involved.

对于情节严重的违规行为，公司将依法与当事人解除劳动合同。

For serious violations, the company will terminate the labor contract with the person involved in accordance with the law.

若违规行为给公司造成经济损失，公司有权要求相关责任人赔偿相应的经济损失。

If the violation causes economic losses to the company, the company has the right to require the relevant responsible person to compensate for the corresponding economic losses.

若违规行为已触犯国家法律法规，公司将直接将相关线索及当事人移交司法机关处理。

If the violation has violated national laws and regulations, the company will directly transfer the relevant clues and the person involved to the judicial authorities for handling.

公司在处理所有违规行为时，将严格遵循公平、公正、公开的原则。处理过程中会充分听取当事人的陈述与申辩，确保最终处理结果合法、合规，保障当事人的合法权益。

When dealing with all violations, the company will strictly follow the principles of fairness, impartiality and openness. During the handling process, the company will fully listen to the statements and defenses of the person involved to ensure that the final handling result is legal and compliant and to protect the legitimate rights and interests of the person involved.

本政策经公司批准，自 2023 年 9 月 7 日起生效。

This policy has been approved by the company and will take effect on September 7, 2023.

黄敏

Min Huang

董事长兼总经理

Chairman of the Board of Directors and President

日期：2023 年 9 月 6 日

Date: 2023/9/6

附件：《商业道德政策承诺书》

商业道德政策承诺书

本人_____（员工姓名），系固德威科技股份有限公司（以下简称“公司”）员工。我充分认识到商业道德对公司新能源业务（光伏逆变器研发、储能设备生产、全球供应链运营等）持续发展及个人职业操守的重要意义，现郑重作出如下承诺：

一、政策知悉确认

本人确认已认真阅读并完全理解公司《商业道德政策》的全部内容，尤其明确以下核心章节的要求：

- ☐ 反腐败与反贿赂相关规定（含供应链采购、海外市场合作场景要求）
- ☐ 利益冲突规避及申报流程（含关联企业、外部兼职申报要求）
- ☐ 反洗钱合规操作要求（含大额资金交易、客户 / 供应商身份核验规范）
- ☐ 反欺诈行为界定与禁止条款（含研发数据、生产记录、客户服务等场景）
- ☐ 信息安全与保密管理规范（含核心技术、客户电站数据、商业秘密保护）
- ☐ 违规行为惩戒措施与处理流程（含分级处罚、责任追究机制）

二、承诺内容

严格遵守上述《商业道德政策》及公司相关规章制度，在工作中坚决践行反腐败、反洗钱、反欺诈、保护信息安全、规避利益冲突等原则，不利用职务便利（如研发决策权、采购审批权、海外业务对接权）实施任何违反商业道德的行为。

主动履行信息申报义务：涉及利益关联（如亲属在供应商 / 竞争对手处任职）、外部兼职（如在同行新能源企业兼职）等情况时，按规定时限向公司 ESG 管理部或人力资源部申报；发现违规风险（如供应商数据造假）或安全隐患（如核心技术泄露）时，第一时间向合规部门或直接上级报告。

以诚信、专业的态度履行工作职责，在光伏逆变器研发、储能项目交付、全球客户服务等业务中，维护公司合法权益、商业信誉及品牌形象，不损害公司及利益相关方（客户、供应商、合作伙伴）的合法权益。

若违反本承诺，本人自愿接受公司依据《商业道德政策》及规章制度作出的惩戒处理（包括但不限于口头警告、书面警告、职务调整、解除劳动合同等），并承担由此产生的一切法律责任（如赔偿公司经济损失、承担违法后果）。

承诺人（签名）：_____

所属部门：_____

员工工号：_____

承诺日期：_____年____月____日