

## 商业行为与道德政策 Business Conduct and Ethics Policy

诚信 · 合规 · 透明 · 负责

Integrity · Compliance · Transparency · Accountability

### 一、政策愿景与适用范围 Policy Vision and Application Scope

**政策愿景：**思源电气坚信，诚信、合规与道德是公司生存与发展的根基，是赢得并维系所有利益相关方信任的基石。本政策旨在确立一套高于法律底线的商业行为准则，以最高标准规范公司在反腐败、公平竞争、利益冲突、数据隐私、信息安全及合规运营等关键领域的实践。我们承诺以身作则，并要求全体员工及商业伙伴共同恪守，旨在构建一个透明、公正、负责任的商业生态系统，捍卫公司声誉，保障可持续的长期价值创造。

**Policy Vision:** Sieyuan Electric firmly believes that integrity, compliance and ethics are the foundation for the Company's survival and development, and the cornerstone of winning and maintaining the trust of all stakeholders. This Policy aims to establish a code of business conduct that goes beyond the minimum legal requirements, setting the highest benchmarks for corporate practices in critical areas including anti-corruption, fair competition, conflict of interest, data privacy, information security, and compliance operations. We commit to leading by example and require all employees and business partners to abide by these principles jointly, aiming to build a transparent, fair, and responsible business ecosystem that safeguards our reputation and ensures sustainable long-term value creation.

**适用范围：**本政策对思源电气全球所有运营实体、董事会成员、管理层及全体员工（含正式、派遣及临时员工）具有强制约束力。同时，我们鼓励并推动供应商、承包商、代理商、经销商及其他商业伙伴履行本政策的核心要求，并将此作为与思源电气建立及维持商业关系的前提。

**Application Scope:** This Policy is mandatory and binding on all global operating entities, members of the Board of Directors, management, and all employees of Sieyuan Electric (including regular, dispatched, and temporary employees). Meanwhile, we encourage and require suppliers, contractors, agents, distributors, and other business partners to comply with the core requirements of this Policy, which shall be a prerequisite for establishing and maintaining commercial relations with Sieyuan Electric.

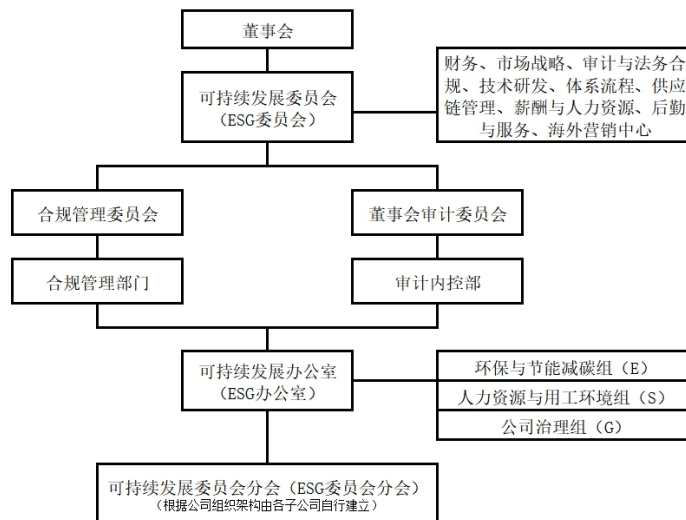
### 二、治理架构与责任分配 Governance Structure and Responsibility Allocation

为确保本政策的权威性与有效实施，公司建立了由董事会负最终责任、管理层抓执行、专门机构强监督、全员共参与的四级治理体系：

To ensure the authority and effective implementation of this Policy, the Company has established a four-tier governance system with the following structure: the Board of Directors assuming ultimate responsibility, management overseeing execution, specialized authorities strengthening supervision, and all employees participating fully:

- 董事会：**董事会及其审计委员会承担公司商业道德与合规文化的最终监督责任，负责审阅重大合规风险报告、评估政策有效性并确保资源投入。
- Board of Directors:** The Board of Directors and its Audit Committee are ultimately accountable for supervising the Company's business ethics and compliance culture. They are responsible for reviewing major compliance risk reports, assessing policy effectiveness, and ensuring adequate resource allocation.
- 可持续发展委员会：**作为核心的战略决策与协调机构，负责审批本政策及重大合规制度，监督公司整体商业道德表现，并决策重大违规事件的处置。

- **Sustainability Committee:** As the core strategic decision-making and coordination body, it is responsible for approving this Policy and major compliance regulations, supervising the Company's overall ethical performance, and deciding on the disposition of major violations.
- **合规管理委员会:** 负责监督公司合规管理制度的整体实施，研究、解决合规管理体系建设、运行过程中出现的重点难点问题。
- **Compliance Management Committee:** It is responsible for supervising the overall implementation of the Company's compliance management system, and studying and resolving key and difficult issues arising from the development and operation of the compliance management system.
- **董事会审计委员会:** 监督集团公司及子公司内部审计、内控制度及其执行情况；对公司审计内控部和各合规内控小组的工作做出评价。
- **Audit Committee of the Board of Directors:** Supervise internal audits, internal control systems and their implementation within the Group and its subsidiaries; assess the work of the Company's Audit and Internal Control Department and all compliance and internal control teams.
- **可持续发展办公室（公司治理组）:** 作为专职执行与日常管理机构，负责政策的宣导、培训、解释、咨询、举报受理、初步调查及持续改进。联合审计内控部开展独立审计。
- **Sustainability Office (Corporate Governance Team):** As a dedicated executive and daily management body, it is responsible for the promotion, training, interpretation, consultation, receipt of reports, preliminary investigation, and continuous improvement of the Policy. It also conducts independent audits in conjunction with the Audit and Internal Control Department.
- **可持续发展委员会分会:** 作为本辖区合规管理的第一责任人，必须确保政策层层传达、有效落地，并将合规表现纳入团队考核。
- **Subcommittees of the Sustainability Committee:** As the primary responsible body for compliance management within its jurisdiction, it shall ensure the cascade communication and effective implementation of the Policy, and integrate compliance performance into team assessment.
- **全体员工:** 每一位员工都是公司道德形象的守护者，有义务学习、遵守并勇于报告违规行为。
- **All Employees:** Every employee is a guardian of the Company's ethical image, and has the obligation to learn, abide by, and courageously report violations.



董事会	Board of Directors
可持续发展委员会（ESG 委员会）	Sustainability Committee (ESG Committee)

合规管理委员会	Compliance Management Committee
董事会审计委员会	Audit Committee of the Board of Directors
合规管理部门	Compliance Management Department
审计内控部	Audit and Internal Control Department
可持续发展办公室（ESG 办公室）	Sustainability Office (ESG Office)
环保与节能减排组（E）	Environmental Protection, Energy Conservation and Carbon Reduction Team (E)
人力资源与用工环境组（S）	Human Resources and Workplace Environment Team (S)
公司治理组（G）	Corporate Governance Team (G)
可持续发展委员会分会（ESG 委员会分会）（根据公司组织架构由各子公司自行建立）	Branch Offices of the Sustainability Committee (Branch Offices of the ESG Committee) (Established by each subsidiary in accordance with the Company's organizational structure)
财务、市场战略、审计与法务合规、技术研发、体系流程、供应链管理、薪酬与人力资源、后勤与服务、海外营销中心	Finance, Market Strategy, Audit and Legal Compliance, Technology R&D, System Process, Supply Chain Management, Compensation and Human Resources, Logistics and Services, Overseas Marketing Center

### 三、核心原则与管理承诺 Core Principles and Management Commitments

思源电气承诺，我们将以最高标准构建坚不可摧的商业道德防线：对贪污腐败采取“零容忍”政策，严禁任何形式的贿赂与不当利益输送；通过健全的内部控制体系严防洗钱与欺诈，确保所有交易背景真实、合规；要求全员主动管理与披露利益冲突，保障商业决策的独立与公正；并秉持负责任的信息管理原则，审慎、合法、安全地保护公司数据资产与个人隐私。

Sieyuan Electric is committed to building an unbreakable business ethical defense in line with the highest standards: adopting a “zero-tolerance” policy against corruption, and strictly prohibiting any form of bribery and improper interest conveyance; implementing a robust internal control system to prevent money laundering and fraud, ensuring all transactions are genuine and compliant; requiring all employees to proactively manage and disclose conflicts of interest to safeguard the independence and fairness of business decisions; and adhering to responsible information management principles to prudently, legally, and securely protect corporate data assets and personal privacy.

我们要求所有人员及商业伙伴须遵守以下“不可逾越”的红线准则：

**We require all personnel and business partners to abide by the following “unbreachable” red line rules:**

**1. 构筑全方位合规防线，坚守法律与道德底线：**我们承诺不仅严格遵守所有经营活动所在国家及地区的法律法规、行业监管要求，更主动采纳国际公认的商业道德最佳实践（如联合国全球契约十项原则）。在法律法规未明确或标准不一致的情形下，将主动选择更高、更严的道德标准，为所有商业行为设立清晰的合规边界。

**Building a Comprehensive Compliance Defense and Upholding Legal and Ethical Bottom Line:** We are committed not only to strictly complying with all applicable laws, regulations, and industry regulatory requirements in the countries and regions where we operate, but also to proactively adopting internationally recognized best practices in business ethics (such as the Ten Principles of the UN Global Compact). In cases where laws and regulations are unclear or standards are inconsistent, we will voluntarily adhere to the higher and stricter ethical standards to establish clear compliance boundaries for all business activities.

- 主动学法与严格守法：系统学习并深刻理解与自身岗位职责相关的法律法规、行业规范及公司内部政策，确保所有行为均在合规框架内开展。
- Initiative in Learning and Strict Compliance with Laws: Systematically study and gain a thorough understanding of laws, regulations, industry standards, and internal policies relevant to one's job duties, ensuring all conduct is carried out within the compliance framework.
- 主动寻求合规指引：当对某项行为的合规性存在疑问时，必须立即暂停相关操作，及时向合规法务部或直接上级咨询，不得自行臆断或冒险推进。
- Proactively Seeking Compliance Guidance: When in doubt about the compliance of any conduct, relevant operations must be suspended immediately and consult the Compliance and Legal Department or your direct supervisor in a timely manner without making assumptions or taking risks.
- 主动报告违规行为：发现任何已知或疑似违反法律法规、行业监管要求或本政策的行为，必须通过正式渠道及时报告，不得隐瞒、纵容。
- Proactively Reporting of Violations: Any known or suspected violations of laws, regulations, industry supervision requirements, or this Policy must be reported immediately through official channels, and shall not be concealed or tolerated.

2. 对贪污腐败“零容忍”，捍卫商业廉洁诚信：我们严禁并杜绝任何形式的贪污、贿赂、回扣、利益输送及其他腐败行为。公司对腐败行为持“零容忍”态度，任何旨在不当影响政府官员、公职人员或商业伙伴决策，以谋取不正当竞争优势或利益的行为，均被绝对禁止。

**“Zero Tolerance” for Corruption, Uphold Business Integrity and Honesty:** We strictly prohibit and reject all forms of corruption, bribery, kickbacks, improper interest conveyance, and other corrupt practices. The Company maintains a “zero-tolerance” attitude toward corrupt behaviors. Any actions intended to improperly influence the decisions of government officials, public officers, or business partners to gain an unfair competitive advantage or improper benefits are absolutely prohibited.

- 坚决拒绝贿赂：不得直接或间接向任何单位或个人（包括其亲属、关联方）提供、承诺给予、索取或接受任何形式的贿赂或不当利益（包括但不限于现金、礼金、礼品、有价证券、购物卡、宴请、旅游、娱乐安排、就业机会、优惠待遇等）。
- Firmly Reject Bribery: It is prohibited to directly or indirectly provide, promise to provide, solicit or accept any form of bribe or improper benefits (including but not limited to cash, gifts, securities, shopping cards, banquets, travel, entertainment, employment opportunities, preferential treatment, etc.) to any organization or individual (including their relatives and related parties).
- 规范记录商务往来：确因业务需要发生的合理商务礼品、招待及差旅费用支出，必须按照公司合规制度事先获得上级主管及/或合规法务部批准，严格遵守公司费用报销制度，并如实、完整地记录在案，确保可追溯、可核查。
- Standardize Recording of Business Transactions: Reasonable expenses for business gifts, hospitality and travel incurred genuinely for business purposes must be approved in advance by the immediate supervisor and/or the Compliance and Legal Department in accordance with the Company's compliance policies. Such expenses shall strictly comply with the Company's expense reimbursement rules, be truthfully and completely recorded, and ensure full traceability and verifiability.
- 强化第三方合规管理：在与代理商、经销商、顾问等商业伙伴合作前，必须开展合规背景尽职调查；在合作协议中明确其反贿赂、反腐败义务；定期对高风险商业伙伴进行合规复审，如发现其代表公司从事违规行为，将立即终止合作并追究相关责任。

- **Strengthen Third-Party Compliance Management:** Prior to cooperation with business partners such as agents, distributors and consultants, mandatory compliance due diligence must be conducted. Anti-bribery and anti-corruption obligations shall be clearly stipulated in the cooperation agreement. Regular compliance reviews shall be carried out for high-risk business partners. If any violation committed on behalf of the Company is identified, the cooperation shall be terminated immediately and corresponding liabilities shall be pursued.

3. **严防洗钱与欺诈，保障财务与业务安全：**我们推动建立并持续完善有效的内部控制，构建“事前防范、事中监控、事后追责”的全流程管控机制，严防死守洗钱、财务欺诈、业务欺诈等违规行为，确保所有交易真实、合法、合规。落实“了解你的客户/伙伴”原则：对客户、商业伙伴的身份信息、业务背景、资金来源等进行必要的核实与登记，对异常交易模式（如无合理商业目的的大额交易、频繁转账等）保持高度警惕。

**Strict Prevention of Money Laundering and Fraud, Safeguard Financial and Business Security:** We promote the establishment and continuous improvement of effective internal controls, and build a full-process management mechanism featuring “prevention in advance, monitoring during execution, and accountability after the event”, to strictly guard against violations such as money laundering, financial fraud and business fraud, and ensure all transactions are authentic, legal and compliant. We implement the “Know Your Customer/Partner” principle: conduct necessary verification and registration of the identity information, business background, fund sources and other details of customers and business partners, and maintain high vigilance against abnormal transaction patterns (e.g., large-value transactions without reasonable commercial purposes, frequent fund transfers, etc.).

- **确保交易与记录真实：**所有业务合同、财务凭证、报销单据、业务记录等必须真实、准确、完整地反映实际发生的商业活动，严禁伪造、变造、篡改任何文件或数据。
- **Ensure Authenticity of Transactions and Records:** All business contracts, financial vouchers, reimbursement documents, business records and other materials must truly, accurately and completely reflect the actual commercial activities. It is strictly prohibited to forge, alter, or tamper with any documents or data.
- **及时报告可疑活动：**一旦发现任何无合理商业目的、来源不明或性质可疑的资金交易、业务行为或文件资料，必须立即通过合规渠道向合规法务部或审计内控部报告。
- **Timely Reporting of Suspicious Activities:** Upon discovering any fund transactions, business activities, or documents that lack reasonable commercial purpose, involve unknown sources or are suspicious in nature, you must immediately report such issues to the Compliance and Legal Department or Audit and Internal Control Department through official compliance channels.

4. **主动管理利益冲突，确保决策客观公正：**我们要求员工必须主动识别、及时申报并严格规避任何可能影响其客观判断、履职公正或损害公司利益的个人利益冲突（包括但不限于财务投资、外部兼职、家庭关系、社交关系等引发的冲突）。

**Proactively Managing Conflicts of Interest, Ensure Objective and Fair Decision-Making:** Employees are required to proactively identify, promptly declare, and strictly avoid any personal conflicts of interest that may compromise their objective judgment, impartial performance of duties, or harm the interests of the Company (including but not limited to conflicts arising from financial investments, external part-time jobs, family relationships, or social connections).

- 全面申报利益冲突：员工一旦发现自身或其近亲属的个人利益（如持有竞争对手股份、在合作方任职、与客户存在密切社交关系等）可能与公司利益发生冲突，必须在3个工作日内通过公司指定渠道向直接上级及合规法务部书面申报。
  - Comprehensive Disclosure of Conflicts of Interest: Employees must submit a written report to their direct supervisor and the Compliance and Legal Department through the Company's designated channels within 3 working days if they discover any personal interests (e.g., holding shares in competitors, holding positions in partners, or maintaining close social ties with clients) that may conflict with the Company's interests.
  - 严格服从冲突管理：无条件接受公司对已申报利益冲突的评估结果及管理安排，包括但不限于回避相关业务决策、调整工作岗位、剥离相关利益等。
  - Strict Compliance with Conflict Management: Unconditionally accept the assessment results and management arrangements issued by the Company regarding declared conflicts of interest, including but not limited to recusal from relevant business decisions, job reassignment, and divestiture of relevant interests.
  - 规范外部兼职行为：未经公司可持续发展委员会书面批准，员工不得在与公司存在竞争关系、业务往来或可能影响本职工作的其他机构担任任何职务（包括兼职、顾问等），不得从事与公司业务相冲突的经营活动。
  - Regulating External Part-Time Work: Without the written approval of the Company's Sustainability Committee, employees shall not hold any position (including part-time jobs, consultancy roles, etc.) in any organization that competes with the Company, has business dealings with the Company, or may affect the performance of their primary duties, as well as engaging in business activities that conflict with the Company's operations.
5. 践行负责任的信息管理，保护数据资产与隐私：我们承诺严格遵守《中华人民共和国个人信息保护法》《中华人民共和国数据安全法》、欧盟《通用数据保护条例》等国内外数据合规法规，对所有商业信息、个人数据及知识产权进行审慎、合法、安全的管理，平衡信息利用与风险防控。

**Practicing Responsible Information Management, Protecting Data Assets and Privacy:** We are committed to strictly complying with the *Personal Information Protection Law of the People's Republic of China*, the *Data Security Law of the People's Republic of China*, the *EU General Data Protection Regulation*, and other domestic and international data compliance laws and regulations. We exercise prudent, lawful and secure management over all commercial information, personal data and intellectual property rights, striking a balance between information utilization and risk prevention and control.

- 遵循数据最小化原则：仅收集、存储、使用为完成本职工作所必需的最小范围的信息与数据，不得超范围收集或滥用数据。
- Adhere to the Data Minimization Principle: Only collect, store, and use the minimum scope of information and data necessary to perform job duties. Do not collect or misuse data beyond the authorized scope.
- 严守授权与保密义务：仅在获得明确授权后，在授权范围内访问、使用或披露公司商业秘密、客户信息及个人数据；离职后，对在职期间接触的涉密信息仍需承担持续保密义务，直至该信息成为公开信息。

- **Strictly Abide by Authorization and Confidentiality Obligations:** Access, use or disclose the Company's trade secrets, customer information and personal data only after obtaining explicit authorization and within the scope of such authorization. After resignation, employees shall continue to bear a continuing duty of confidentiality with respect to the confidential information accessed during their employment until such information becomes publicly available.
  - **保障信息安全：**严格遵守公司信息安全管理规定，使用公司认可的安全工具处理、传输和存储信息，定期更换密码，妥善保管涉密载体（如电脑、U盘、文件），防范数据泄露、丢失或被非法访问。
  - **Safeguarding Information Security:** Strictly comply with the Company's information security management policies. Use security tools approved by the Company to process, transmit and store information. Change passwords regularly, properly keep confidential carriers (such as computers, USB drives and documents), and prevent data leakage, loss or unauthorized access.
  - **尊重知识产权：**不得侵犯公司或第三方的商标权、专利权、著作权、商业秘密等知识产权，在业务活动中合理使用他人知识产权时，必须事先获得合法授权。
  - **Respect for Intellectual Property Rights:** Do not infringe upon the intellectual property rights of the Company or third parties, including trademarks, patents, copyrights, trade secrets, etc. When reasonably using third-party intellectual property rights in business activities, lawful authorization must be obtained in advance.
6. **维护公平、诚信的市场竞争环境：**我们坚决遵守国内外反垄断与反不正当竞争法律法规，致力于通过卓越的产品质量、优质的服务体验与持续的技术创新赢得市场，拒绝任何形式的不正当竞争行为。

**Upholding a Fair and Honest Market Competition Environment:** We firmly abide by domestic and foreign laws and regulations on anti-monopoly and anti-unfair competition. We are committed to winning the market through outstanding product quality, excellent service experience and continuous technological innovation, and reject all forms of unfair competition behaviors.

- **坚持独立决策：**禁止与竞争对手私下讨论或交换任何可能影响市场竞争的敏感信息，包括但不限于产品价格、定价策略、成本、客户名单、市场份额、投标报价等。
- **Uphold Independent Decision-Making:** It is prohibited to privately discuss or exchange with competitors any sensitive information that may affect market competition, including but not limited to product prices, pricing strategies, costs, customer lists, market share, bid quotations, etc.
- **尊重竞争对手：**在市场营销、产品宣传及商业活动中，应基于客观事实，不得捏造、散布虚假信息，不得诋毁、贬损竞争对手的商业信誉、产品或服务。
- **Respect Competitors:** In marketing, product promotion and business activities, we should base on objective facts, and not fabricate or spread false information, and not defame or degrade the business reputation, products or services of competitors.
- **合规参与招投标：**在招投标活动中，严格遵守招投标法律法规及程序要求，禁止串通投标、围标、陪标，禁止向招标方或评标方提供不当利益以获取不正当优势。

- **Compliance in Bidding and Tendering:** In bidding and tendering activities, strictly abide by applicable laws, regulations and procedural requirements. Collusion in bidding, bid rigging, and acting as a sham bidder are prohibited. It is forbidden to provide improper benefits to the tendering party or evaluation party to obtain unfair advantages.

#### 四、量化管理目标 Quantitative Management Objectives

为系统化、可衡量地推进承诺，我们设定以下量化管理目标，所有改善目标均以 **2024 年为基准年**。

To systematically and measurably advance our commitments, we have set the following quantitative management objectives, with **2024 as the base year** for all improvement objectives.

管理议题 Management Topics	短期目标 (2024 基准年-2026 目标年) Short-term Objectives (Base year 2024 – Target year 2026)	长期目标 (2024 基准年-2030 目标年) Long-term Objectives (Base year 2024 – Target year 2030)
文化渗透与意识 Cultural Penetration and Awareness	1. 高风险岗位员工年度合规与信息 安全培训完成率 100%。 100% completion rate of annual compliance and information security training for employees in high-risk positions. 2. 全员合规政策知晓率与承诺书签 署率 100%。 100% employee awareness rate of compliance policies and signing rate of commitment letters. 3. 新供应商签约前合规告知率 100%。 100% compliance notification rate for new suppliers before contract signing.	1. 员工年度匿名合规文化评估平均 得分 $\geq 4.5$ 分 (5 分制)。 Average score of annual anonymous employee compliance culture assessment $\geq 4.5$ (5-point scale). 2. 商业道德领导力专项培训完成率 100%。 100% completion rate of specialized training on business ethics leadership.
风险管理 Risk Management and Audit	每年针对至少 2 个合规与信息安全的 高风险领域开展专项合规审计。 Conduct specialized compliance audits in at least 2 high-risk areas of compliance and information security each year.	审计发现的重大/重要缺陷率 $\leq$ 95%。 Rate of major/material deficiencies identified in audits $\leq 95\%$ .
体系认证与标 杆 System Certification and Bench-marking	1. 推进主要运营地及分子公司，搭 建反腐败合规体系； Promote the establishment of anti-corruption compliance systems in major operation sites and subsidiaries; 2. 信息安全管理覆盖率 100%。	1. 推进主要运营基地或 2 家子公司 获得 ISO 37001 (反贿赂管理体系) 或同等权威认证。 Promote major operation bases or 2 subsidiaries to obtain ISO 37001 (Anti-bribery management system) or

管理议题 Management Topics	短期目标 (2024 基准年-2026 目标年) Short-term Objectives (Base year 2024 – Target year 2026)	长期目标 (2024 基准年-2030 目标年) Long-term Objectives (Base year 2024 – Target year 2030)
	Achieve 100% coverage rate of information security management system.	equivalent authoritative certification. 2. 信息安全管理体系统覆盖率 100%。 Achieve 100% coverage rate of information security management system.

**目标管理说明：**短期目标侧重合规底线与基础管理，长期目标侧重体系完善与文化深化，所有量化目标的测量与追踪将依赖于每年度商业道德绩效数据系统与定期内外部审计，并每年进行评审和动态调整。

**Objective Management Note:** The short-term objectives focus on compliance baseline and basic management, while the long-term objectives emphasize system improvement and cultural deepening. The measurement and tracking of all quantitative objectives shall rely on the annual environmental performance data systems and regular internal and external audits, with annual reviews and dynamic adjustments.

## 五、沟通、培训与透明举报 Communication, Training and Transparent Reporting

为确保本政策全覆盖、无死角传达，思源电气将通过多渠道开展传达与培训工作，包括面向内部员工的入职培训、年度必修课、管理层宣讲、内网专栏，以及面向供应链的供应商大会、ESG 专项渠道；同时设立 [ESG@sieyuan.com](mailto:ESG@sieyuan.com) 邮箱接受监督，定期发布 ESG 报告，持续提升供应链透明度与管理水平。

To ensure the full coverage and effective communication of this Policy without blind spots, Sieyuan Electric will conduct communication and training through multiple channels, including onboarding training, mandatory annual courses, management briefings and internal website columns for internal employees, as well as supplier conferences and ESG dedicated channels for the supply chain. Meanwhile, the e-mail address [ESG@sieyuan.com](mailto:ESG@sieyuan.com) is established to receive supervision and feedback, and will regularly issue ESG reports to continuously improve supply chain transparency and management capabilities.

我们鼓励所有利益相关方（包括供应商员工）通过统一独立的保密举报渠道。专项邮箱：（合规法务部（销售端及其他）：[hgfwb@sieyuan.com](mailto:hgfwb@sieyuan.com)、审计内控部（采购端及其他）：[nk@sieyuan.com](mailto:nk@sieyuan.com)）举报任何违反本政策的行为，并承诺：将对所有举报开展公正、独立的调查，严格保密举报人及举报内容，绝对禁止并严肃查处任何形式的打击报复，同时在保护调查机密性和当事人隐私的前提下，视情况向举报人及公司管理层反馈处理进展与结果。

We encourage all stakeholders (including supplier employees) to report any violations of this Policy through the unified, independent and confidential reporting channels. Dedicated e-mail addresses: **(Compliance and Legal Department (sales and others): [hgfwb@sieyuan.com](mailto:hgfwb@sieyuan.com); Audit and Internal Control Department (procurement and others): [nk@sieyuan.com](mailto:nk@sieyuan.com)**. We commit to conducting fair and independent investigations into all reports, keeping whistleblowers and reporting information strictly confidential, absolutely prohibiting and seriously investigating any form of retaliation, and providing feedback on investigation progress and outcomes to whistleblowers and the Company's management as appropriate under the premise of protecting investigative confidentiality and the privacy of relevant parties.

对于违反本政策的行为，公司将依据情节严重程度、造成的损失及影响，采取包括但不限于警告、罚款、降职、解除劳动合同等内部处分；涉及违法犯罪的，依法移交司法机关处理。对于未履行管理责任导致辖区内发生重大合规风险或违规事件的管理者，将依法依规追究其领导责任。

For violations of this Policy, the Company will impose internal disciplinary actions, including but not limited to warnings, fines, demotions, and termination of labor contracts based on the severity, losses incurred, and its impact. Any violation involving illegal or criminal offenses will be transferred to judicial authorities in accordance with the law. Managers who fail to fulfill their management responsibilities, resulting in significant compliance risks or violations within their jurisdiction will be held accountable for their leadership in accordance with applicable laws and regulations.

## 六、政策更新与审查机制 Policy Update and Review Mechanism

**年度审查：**可持续发展办公室（公司治理组(G)）将牵头，每年对本政策的实施效果、目标达成情况、内外部环境变化（如法律法规更新、行业风险变化、业务模式调整）进行全面评估，形成评估报告并向可持续发展委员会汇报。

**Annual Review:** The Sustainability Office (Corporate Governance Team (G)) shall take the lead in conducting a comprehensive annual assessment of the implementation effectiveness, target achievement, and changes in internal and external environments (such as updates to laws and regulations, changes in industry risks, and adjustments to business models) regarding this Policy. An assessment report shall be prepared and submitted to the Sustainability Committee.

**全面更新：**每三年对本政策进行一次全面、系统性的审查与修订，吸收行业最佳实践，强化政策的战略性与引领性，确保其持续满足公司合规管理与可持续发展的需求。

**Comprehensive Update:** The Policy shall be systematically reviewed and revised every three years, industry best practices shall be incorporated to enhance the strategic value and leading role of the Policy, so as to ensure its continuous alignment with the Company's needs for compliance management and sustainable development.

**动态调整：**当相关法律法规、行业监管要求发生重大变化，公司业务范围、组织架构发生重大调整，发生重大合规风险事件或违规案件且暴露出政策漏洞，以及年度评估发现政策存在不匹配、不明确的内容时，及时启动政策修订程序。

**Dynamic Adjustment:** The Policy revision process shall be initiated promptly in the event of significant changes to relevant laws, regulations and industry regulatory requirements, major adjustments to the Company's business scope and organizational structure, the occurrence of material compliance risk incidents or violation cases that expose policy loopholes, as well as the identification of inapplicable or unclear provisions through annual policy assessment.

## 七、最高管理者承诺 Top Management Commitment

## 董事长承诺

### Commitment from the Chairman

作为思源电气股份有限公司董事长暨最高管理者，在此郑重承诺：

As the Chairman and Top Management of Sieyuan Electric Co., Ltd., I hereby solemnly commit:

思源电气将以最高的道德标准和坚定的合规决心，恪守本政策所确立的“诚信、合规、透明、负责”核心原则。董事会及管理层将以身作则，率先垂范，致力于在公司全球运营的各个层面培育并巩固坚不可摧的诚信文化。

Sieyuan Electric will adhere to the highest ethical standards and unwavering commitment to compliance, and abide by the core principles of “Integrity, Compliance, Transparency and Accountability” established in this Policy. The board of directors and management will lead by example and be committed to fostering and consolidating an unbreakable culture of integrity across all levels of the Company’s global operations.

我们承诺，将提供充分的资源与支持，建立健全有效的商业道德与合规管理体系，对任何形式的腐败、欺诈及不正当行为持“零容忍”态度。我们要求每一位员工及商业伙伴都能理解、认同并践行本政策的要求，共同维护公平、廉洁的商业环境，守护公司的声誉与长期价值。

We commit to providing adequate resources and support, establishing a sound and effective business ethics and compliance management system, and maintaining a “zero-tolerance” attitude toward all forms of corruption, fraud and improper conduct. We require every employee and business partner to understand, endorse and implement the requirements of this Policy, so as to jointly maintain a fair and integrity business environment and safeguard the Company’s reputation and long-term value.

我们将确保本政策得到不折不扣的执行，并通过持续的教育、透明的沟通与严格的监督，使之融入公司的决策流程与日常运营。我们坚信，唯有坚守道德底线，方能行稳致远，赢得客户、合作伙伴及社会的持久信任，为公司的可持续发展奠定最坚实的根基。

We will ensure the full and faithful implementation of this Policy, and integrate it into the Company’s decision-making processes and daily operations through continuous education, transparent communication and rigorous supervision. We firmly believe that only by upholding ethical bottom lines can we achieve steady and long-term development, win the lasting trust of customers, partners and society, and lay the most solid foundation for the Company’s sustainable development.

承诺人：

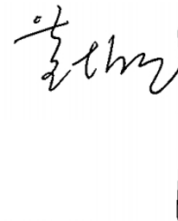
Committed by:

职务：董事长

Title: Chairman of the Board

日期：2026年4月1日

Date: April 1, 2026



## 八、版本控制记录 Version Control Record

版本号 Version No.	修订日期 Revision Date	修订原因 Reason for Revision	修订人/部门 Revised By/ Department	修订人/部门 Revised By/ Department	审批人/部门 Approved By/ Department
V1.0	2024.12.31	首次发布 Initial Release	高嘉婧/供应链管理 部/生产管理部 Gao Jiaying/ Supply Chain Management Department/ Production Management Department	高春南/供应链管 理部/生产管理部 Gao Chunnan/ Supply Chain Management Department/ Production Management Department	冒友建/供应 链管理部 Mao Youjian/ Supply Chain Management Department
V1.1	2025.12.15	内容增补完 善、管理目 标调整 Content Supplement ation, Managemen t Objectives Adjustment	高嘉婧/供应链管 理部/生产管理部 Gao Jiaying/ Supply Chain Management Department/ Production Management Department	高春南/供应链管 理部/生产管理部 Gao Chunnan/ Supply Chain Management Department/ Production Management Department	冒友建/供应 链管理部 Mao Youjian/ Supply Chain Management Department

发布日期：2026年4月1日

Issued on: April 1, 2026

签发：思源电气股份有限公司

Issued by: Sieyuan Electric Co., Ltd.

可持续发展委员会

Sustainability Committee

附件：《员工合规承诺书》摘自 Integrity Compliance Management Protocol for Human Resources 《人力资源廉洁诚信合规管理办法》文号：SY/A-RS(2025)002，由法务合规部于 2025 年 4 月发布。

## Employee compliance commitment

### 员工合规承诺书

I am the employee of \_\_\_\_\_ (hereinafter referred to as “the company”). The company requires employees to abide by the following terms:

本人为\_\_\_\_\_（以下简称公司）\_\_\_\_\_部门员工，公司要求员工遵守以下条款：

一、 Strictly abide by the requirements of national laws, regulations, rules and other regulatory documents, as well as the relevant laws and regulations of the countries (regions) involved in the business, abide by the company's rules and regulations, in particular the Integrity Compliance System which includes Sieyuan Compliance Code of Conduct, and strictly follow the rules and regulations;

严格遵守国家法律、法规、规章及其他规范性文件要求，以及业务所涉国家（地区）的相关法律法规，遵守公司规章制度，特别是包括《思源合规行为准则》在内的思源廉洁诚信合规制度体系等，严格按制度办事；

二、 It is strictly forbidden to accept the benefits provided by suppliers or other third parties in cash, in kind or in any other way. It is not allowed to use the position to provide suppliers or other third parties with business opportunities that do not meet the company's requirements. It is strictly forbidden to engage in malpractices; 严禁接受供应商或其他第三方以现金方式、实物方式或其他任何方式提供的利益，不得利用职务之便为供应商或其他第三方提供不符合公司规范要求的业务机会，公司严禁徇私舞弊的行为；

三、 Strictly abide by the relevant laws and regulations on anti-fraud, anti-corruption, anti-bribery, anti-money laundering, anti-unfair competition, export control and sanctions, etc., in the country or region where the business is located, and comply with the relevant requirements of customers and international financial organizations,

it is not allowed to engage in improper acts that violate relevant laws, regulations and requirements.

严格遵守业务所在国家或地区关于反欺诈、反腐败、反贿赂、反洗钱、反不正当竞争、出口管制与制裁等相关法律法规及客户、国际金融组织相关方面的要求，不得从事违反相关法律法规、要求的不当行为。

四、 Strictly regulate own business behaviour, strictly prohibit forgery of documents or any falsification, and must ensure the authenticity and accuracy of important materials such as qualification certificates, performance materials, operation reports, and test reports;

严格规范自身商业行为，严禁伪造文件、弄虚作假，必须确保提供的资质证明、业绩资料、运营报告、检测报告等重要材料的真实性、准确性；

五、 It is strictly forbidden to participate in the business activities of companies that have a competitive relationship with the company. It is strictly forbidden to violate the confidentiality regulations and disclose the trade secrets of the company;

严禁参与与本公司有竞争关系的公司的经营活动，严禁违反保密规定，泄漏公司商业机密；

六、 Report any major violations of laws and regulations to the company timely, cooperate with the company to investigate relevant actions or take remedial measures.

发现任何重大违法违规行为及时报告公司，配合公司查处相关行为或采取补救措施。

I have carefully read the above terms and am committed to comply with the compliance requirements in the above terms. I am willing to bear corresponding responsibility in case of any violation.

本人已认真阅读以上条款，并承诺遵守上述条款中的各项合规要求，如有违反，本人愿承担相应责任。

Signature of the promisee (承诺人签字): \_\_\_\_\_

Date (日期): \_\_\_\_\_

(本确认书一式两份，员工与公司各执一份，并归入员工档案)