

欣旺达电子股份有限公司合规行为准则

Code of Conduct for Compliance of Sunwoda Electronic Co., Ltd.

(试行)

(Trial)



前言

Introduction

为稳定满足顾客、社会和员工等相关方要求，实现可持续发展，我们承诺：

To stably meet the requirements of customers, society, employees and other interested parties and achieve sustainable development, Sunwoda promises that:

公司要及时、全面地了解相关方要求和期望，并努力予以满足。公司要及时、全面地识别和遵守适用的国际国内法律、法规、行业标准和其他要求，开展经常性的员工培训，提高员工对质量、环境、职业健康安全等方面的合规意识，提高员工业务、安全防护和预防污染等能力。

The Company will learn about the requirements and expectations of interested parties in a timely and comprehensive manner, and strive to meet them. The Company will identify and comply with applicable international and Chinese laws, regulations, industry standards and other requirements in a timely and comprehensive manner, and conduct regular employee training to improve employees' awareness of compliance with quality, environment, occupational health and safety, etc. and enhance employees' capabilities on business, safety protection, pollution prevention, etc.

公司开展全面有效的监视、测量和分析活动，及时发现不合规行为和改进机会，促进管理体系各过程受控和目标的实现。

The Company will conduct comprehensive and effective monitoring, measurement and analysis activities to identify non-compliance conducts and improvement opportunities, so as to promote both the control of various processes and the realization of objectives of the management system.

公司要求管理者充分了解公司内外部环境和相关绩效水平，适时开展合规管理评价，持续提高公司整体绩效。

The Company will require the management to fully understand the Company's internal and external environment and relevant performance levels and conduct compliance management evaluations in a timely manner, so as to continuously improve the overall performance of the Company.

董事长致辞

Speech by Chairman of the Board of Directors

欣旺达以锂电池模组研发、设计、生产及销售为主营业务，提供绿色、快速、高效的新能源一体化解决方案。公司自上市以来业务得到了快速发展，在立足深圳、服务全球的愿景下，公司逐步建立深圳宝安、深圳光明、惠州博罗、江苏南京、浙江兰溪、印度新德里、山东枣庄、江西南昌等多个生产基地，并已发展成为全球锂离子电池领域的领军企业。随着企业的快速发展，公司不光要着眼未来，还要夯实基础。因为，做企业就是战战兢兢、如履薄冰。一个企业要做起来，需要十年、二十年，甚至百年，但是一个企业倒下去，可能只需要一个月，几天，甚至顷刻间！依法合规经营是企业生存发展的警戒线和生命线，企业保障合规，才能行稳致远。

Sunwoda focuses on the R&D, design, production and sales of lithium battery modules, and provides green, fast and efficient new energy integrated solutions. Since the listing of the Company, our business has experienced rapid development. Based in Shenzhen and serving the world, the Company has gradually established production bases in Bao'an District of Shenzhen, Guangming District of Shenzhen, Boluo County of Huizhou, Nanjing City of Jiangsu, Lanxi City of Zhejiang, Zaozhuang City of Shandong, Nanchang City of Jiangxi, New Delhi of India, and has developed into a global leader in the field of lithium-ion batteries. With such rapid development, we should not only focus on the future, but also lay a solid foundation. Because running a business is as if treading on thin ice, we should be very careful. It may take ten, twenty, or even a hundred years to run a business successfully, but it may only take a month, a few days, or even an instant for an enterprise to fall down! Legal and compliant operation is the warning line and lifeline for the survival and development of an enterprise. Only when an enterprise guarantees its compliance can it achieve stable and long-term development.

欣旺达合规，秉持“遵法守规、诚信经营、合规治企、创造价值”的合规方针，“多措并举、重在预防”，依法合规经营。在重视层面上，要从领导层做起，带头“学合规”、“讲合规”、“守合规”，以身作则，带动管理层以及全员践行诚信合规；在治理结构上，设立专门的合规部门主导集团合规风险管理工作，保持独立性，聘请专业的合规人才，打造专业的合规队伍；在制度层面上，公司建立系统的合规制度体系，规范业务流程，使得公司合规工作有法可依，有章可循；在合规文化层面上，建立线上线下的合规文化体系，积极赋能培训，提高全员合规意识和合规风险管控能力，打破舞弊三角，降低舞弊机会，推动公司全员谨守“成就客户、自我批判、诚信本分、激情奋斗、团队合作”的核心价值观文化。

Adhering to the compliance policy of "abiding by laws and regulations, operating in good faith, managing enterprise in compliance and creating values", Sunwoda operates in compliance with the law by taking multiple measures and focusing on prevention. In terms of emphasis, we, starting from the leadership, take the lead in "learning compliance", "stressing compliance" and "obeying compliance", and set an example to drive the management and all employees to practice integrity and compliance. In terms of governance structure, we set up a special and independent compliance department to lead the compliance risk management of the Group, and hire professional compliance personnel to form a professional compliance team. In terms of institutional level, we establish a systematic compliance

system to standardize business processes, so that the Company's compliance work has laws and rules to follow. In terms of compliance culture, we establish online and offline compliance culture systems and actively conduct empowerment training to improve all employees' compliance awareness and compliance risk control ability, so as to break the fraud triangle, reduce fraud opportunities, and promote all employees to abide by the core value culture of "customer achievement, self-criticism, integrity, passionate struggle and teamwork".

公司遵循在开放中发展，与不同国家的商业合作伙伴保持长期合作关系，遵守商业道德，将诚信合规的要求延伸到客户、股东、供应合作伙伴等相关方，促进双赢。

Following the principle of development in opening up, we maintain long-term cooperative relations with business partners from different countries, abide by business ethics, and extend the requirements for integrity and compliance to customers, shareholders, supply partners and other interested parties to promote a win-win situation.

公司用先进的指标体现国际一流，用持续的发展保持国际一流。关注员工价值体现，自觉履行社会责任，诚信合规的开展经营活动，满足客户。

We prove our international first-class level with advanced operating indicators and maintain this level with sustainable development. We focus on the value embodiment of employees, consciously fulfill our social responsibilities, and carry out business activities in good faith and compliance to satisfy our customers.

举棋若定，落子有声，方能决胜千里之外。合规经营，诚信治企，确保合规管理体系有效实施，持续改进，方能确保企业持续健康发展。

We must be determined and practical in compliance management to gain a great decisive victory. Only by operating in compliance, managing the enterprise in good faith, ensuring the effective implementation and continuous improvement of the compliance management system can we ensure the sustainable and healthy development of the Company.

适用范围：本手册适用于欣旺达电子股份有限公司（以下简称公司）所有员工。

Scope of application: This manual is applicable to all employees of Sunwoda Electronic Co., Ltd. (hereinafter referred to as the Company).

目录

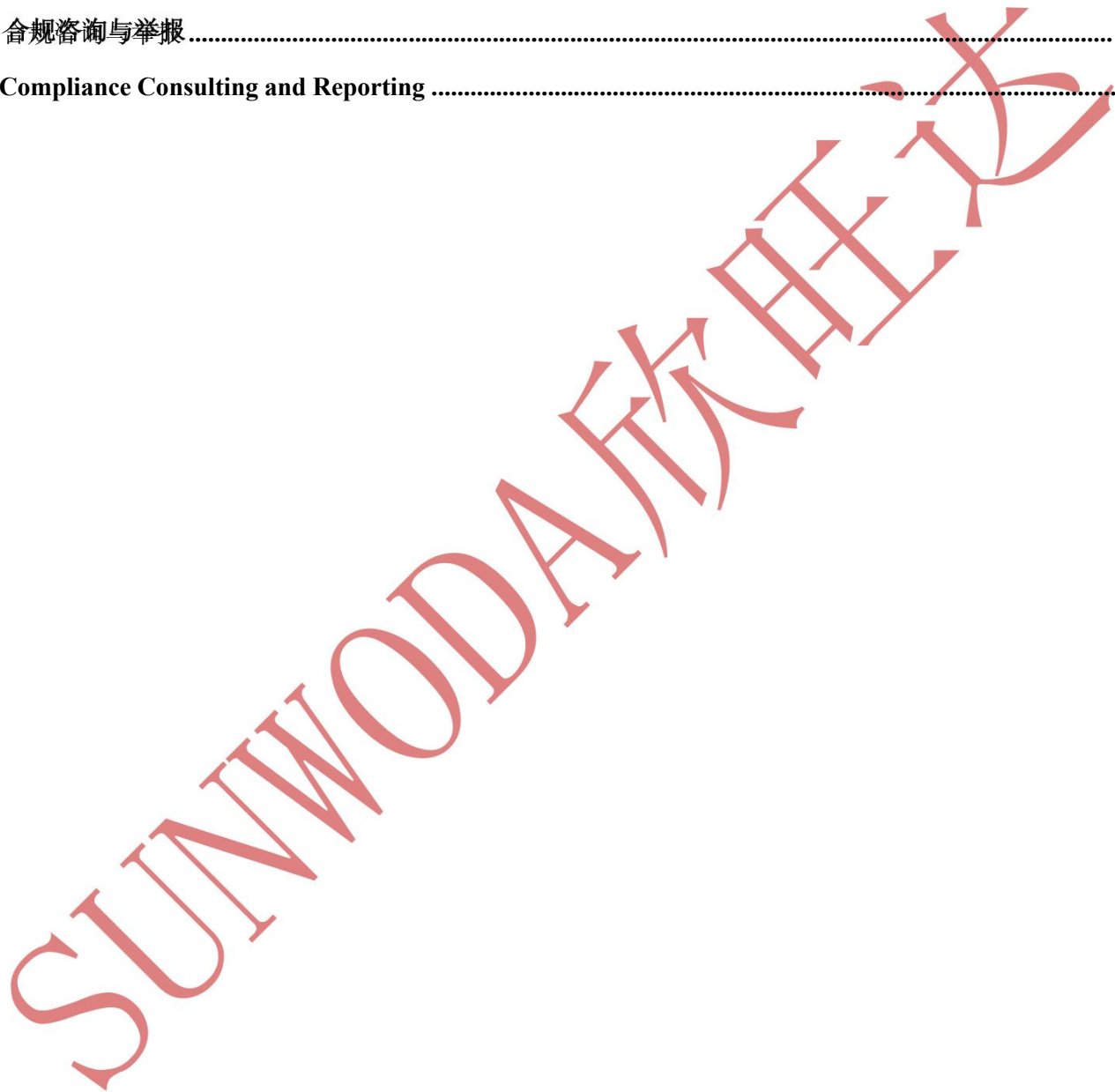
Contents

前言	2
Introduction	2
1 保障人身安全	9
1. Guarantee of Personal Safety	9
1.1 安全教育	9
1.1 Safety education	9
1.2 劳动保护用品	9
1.2 Labor protection articles	9
1.3 隐患事故报告	10
1.3 Reporting of hidden dangers and accidents	10
2 保障员工权益	10
2. Guarantee of Employees' Rights and Interests	10
2.1 平等与包容	10
2.1 Equality and inclusion.....	10
2.2 劳动关系争议	11
2.2 Labor relations disputes	11
3 保护公司资产	12
3. Protection of Corporate Assets	12
4 知识产权与商业秘密保护	13
4. Protection of Intellectual Properties and Trade Secrets	13
4.1 知识产权	13
4.1 Intellectual properties.....	13
4.2 商业秘密保护	14
4.2 Protection of trade secrets	14
5 信息披露与对外宣传	16
5. Information Disclosure and External Publicity	16

5.1 信息披露	16
5.1 Information disclosure	16
5.2 对外宣传	16
5.2 External publicity	16
6 环境保护	17
6. Environmental Protection	17
6.1 环境管理	17
6.1 Environmental management	17
6.2 能源管理	18
6.2 Energy management	18
6.3 绿色办公	18
6.3 Green office culture	18
7 产品与服务品质	19
7. Quality of Products and Services	19
7.1 质量管理	19
7.1 Quality management	19
7.1.1 质量管理体系	19
7.1.1 Quality management system	19
7.1.2 质量控制	20
7.1.2 Quality control	20
7.2 客户服务	21
7.2 Customer service	21
7.2.1 客户满意度	21
7.2.1 Customer satisfaction	21
7.2.2 反馈及投诉机制	21
7.2.2 Feedback and complaint mechanism	21
8 安全生产	22
8. Safety Production	22

8.1 职业健康安全	22
8.1 Occupational health and safety	22
8.2 安全培训	22
8.2 Safety training	22
9 信息安全与隐私保护	23
9. Information Security and Privacy Protection	23
9.1 信息安全	23
9.1 Information security	23
9.2 隐私保护	24
9.2 Privacy protection	24
10 反垄断与公平竞争	26
10. Anti-monopoly and Fair Competition	26
11 反洗钱	26
11. Anti-money Laundering	26
12 会计与财务合规	26
12. Accounting and Financial Compliance	27
13 商业伙伴管理	28
13. Management of Business Partners	28
14 反腐败与反商业贿赂	28
14. Anti-corruption and Anti-commercial Bribery	28
15 利益冲突	29
15. Conflict of Interest	29
16 礼品招待	30
16. Gifts and Entertainment	30
17 社会责任	31
17. Social Responsibility	31
17.1 慈善捐赠	31
17.1 Charitable donation	31

17.2 社区关系	32
17.2 Community relations	32
18. 境外业务合规	33
18. Compliance of Overseas Business	33
19. 合规咨询与举报	34
19. Compliance Consulting and Reporting	34



1 保障人身安全

1. Guarantee of Personal Safety

安全生产人人有责，公司始终把安全生产及员工人身安全放在第一位。员工在从事任何工作时，必须在有效的安全管理下进行，杜绝一切违反安全管理的行为。员工必须增强安全法制观念，牢固树立安全责任意识，摆正安全与施工生产的关系，始终把安全生产放在第一位。

Everyone shall be responsible for safety production. The Company always puts safety production and personal safety of employees first. Employees engaged in any job must work under effective safety management so as to put an end to all acts in violation of safety management. Employees must enhance their legal knowledge of safety, firmly establish the awareness of safety responsibility, straighten out the relationship between safety and construction production, and always put safety production first.

1.1 安全教育

1.1 Safety education

公司员工入职必须接受“三级安全教育”，参加安全考试，考试合格方能上岗。

New employees must receive "three-level safety education" and take the safety examination. They can take up their posts only after passing the examination.

特种作业人员必须进行特种安全教育，取得作业证方能上岗。

Special operation personnel must receive special safety education and obtain operation certificates before taking up their posts.

公司员工必须自觉接受经常性安全教育，参加全员安全知识考试和各类安全活动，了解安全常识，掌握安全知识。

Employees must consciously accept regular safety education, participate in safety knowledge examinations for all employees and various safety activities, know common sense of safety, and master safety knowledge.

1.2 劳动保护用品

1.2 Labor protection articles

公司员工进入生产车间必须按规定着装，佩戴口罩、劳保鞋、防尘服等劳保用品；

Employees must wear masks, safety shoes, dust-proof clothing and other labor protection articles as required when entering the production workshop;

进入容器、设备内作业必须申办证并得到批准；

Employees must apply for a permit and be approved before working in containers or equipment;

进入施工现场、车间必须佩戴安全帽。公司配发的安全帽、安全带应妥善保管；

Employees must wear safety helmets when entering construction sites or workshops, and shall properly maintain safety helmets and safety belts distributed by the Company;

高处作业不戴安全帽、安全带，脚手架不牢、作业点带电、设备线路安全距离不够或无安全护栏等，不准登高作业。

Work at heights is not permitted under the following circumstances: failure to wear safety helmets and safety restraints, insecure scaffold, live operation point, insufficient safety distance of equipment lines or no safety guardrail.

1.3 隐患事故报告

1.3 Reporting of hidden dangers and accidents

员工发现事故隐患应及时报告，发现重大危及人身安全隐患时，应采取尽可能的措施后，撤离生产现场；员工发现或发生事故必须立即报告，及时抢救伤员并保护好事故现场，尽可能采取适宜措施，防止事故或伤害进一步扩大。

Employees shall report hidden dangers in time. In case of major hidden dangers endangering personal safety, employees shall take every possible action and then evacuate the production site. Employees must report immediately when they find or have an accident, rescue the injured in time, protect the accident site, and take every appropriate action to prevent further expansion of the accident or damage.

2 保障员工权益

2. Guarantee of Employees' Rights and Interests

2.1 平等与包容

2.1 Equality and inclusion

公司为每一位员工提供平等机会，不因民族、宗教、性别、国籍等原因，在招聘录用、薪酬福利、职业发展、奖励惩处等方面对员工歧视或差别对待。公司禁止使用任何形式的童工、强迫或强制劳动力。

The Company provides equal opportunities for every employee and does not discriminate against or treat employees differently in recruitment and employment, salary and benefits, career development, reward and punishment due to ethnic group, religion, gender, nationality and other reasons. The Company prohibits the use of any child labor, or forced labor.

公司尊重和关爱员工，切实维护员工合法权益。严格依照相关规定按时足额向员工支付薪酬，依法为

员工缴纳社会保险，保障员工依法享有休息休假的权利，努力改善和提高员工福利待遇。公司根据员工在各自工作岗位上的整体资历和绩效对其进行雇用、晋升和提供发展机会。公司根据每个人的知识、经验和能力，提供适当的支持和发展机会。

The Company respects and cares for its employees and earnestly protects their legitimate rights and interests.

The Company pays employees in full and on time in strict accordance with relevant regulations, pays social insurance for employees in accordance with the law, guarantees employees' legal right to rest and vacation, and strives to improve employees' benefits. The Company hires, promotes and provides development opportunities to employees based on their overall seniority and performance in their respective posts. The Company provides appropriate support and development opportunities based on each employee's knowledge, experience and ability.

公司制定涉及员工切身利益的规章制度和政策，充分听取员工的意见和建议，均通过职工代表大会制度审议。

The Company formulates rules, regulations and policies concerning the vital interests of employees, and works to obtain the opinions and suggestions of employees. All of these have been reviewed through the system of workers and staff congress.

2.2 劳动关系争议

2.2 Labor relations disputes

为保障员工合法权益，公司成立工会，员工可以通过 10 余种线上/线下等方式可以找到工会进行维权，其中员工关爱热线 86-0755-29516888 转 51880（我要帮帮您），24 小时 365 天全年无休，专人接听员工来

电，受理员工投诉建议、隐患

、困难帮扶、学历提升、心理咨询等业务；针对员工申诉设立关爱系统，指派职能部门限时跟进处理，专人对处理进度及结果进行监督，并对申诉员工进行满意度回访。

The Company has established the Labor Union to protect the legitimate rights and interests of employees.

Employees can contact the Labor Union to protect their rights by more than 10 online/offline ways. The employee care hotline +86 - (755) - 29516888 ext 51880 (I Will Help You) is available 24 hours a day, 365 days a year. Specially-assigned personnel will answer calls from employees, and accept employee complaints and suggestions, reports of hidden dangers, assistance for employees in difficulties, education qualifications, psychological counseling, etc. We set up a care system for employee complaints, assign functional departments to follow up and deal with them within a limited time, and specially-assigned personnel will supervise the

劳动关系争议

SUNWODA 欣旺达

processing progress and results and conduct a return visit to the complaining employees for satisfaction.

为提升公司劳动争议预防能力，正当、合规、立即把劳动争议处理在萌芽状态，保护职工正当权益，以友好劳动关系确保企业生产经营有效运行，依据《中华人民共和国劳动争议仲裁法》、《企业劳动争议

协商调解规定》成立劳动争议调解委员会，主任由工会主席担任，调解委员会办公室设在工会。受理业务范围：因劳动合同履行发生的纠纷、休息休假纠纷、员工奖惩纠纷、社会保险纠纷、劳动保护纠纷、因跨地区调动，岗位调整，加班等发生的纠纷。

To improve the Company's ability to prevent labor disputes, handle labor disputes promptly properly, compliantly and immediately, protect the legitimate rights and interests of employees, and ensure the effective operation of enterprise production and operation through friendly labor relations, we have established the Labor Dispute Mediation Committee with the chairman of Trade Union serving as the director and the office set in the Trade Union in accordance with the *Law of the People's Republic of China on Mediation and Arbitration of Labor Disputes* and the *Provisions on the Negotiation and Mediation of Enterprise Labor Disputes*. Business scope: disputes arising from the performance of labor contracts, rest and vacation disputes, employee reward and punishment disputes, social insurance disputes, labor protection disputes, as well as disputes arising from cross-regional transfer, post adjustment, overtime, etc.

3 保护公司资产

3. Protection of Corporate Assets

公司资产是指对公司具有价值的信息及相关资源，是信息安全策略的保护对象，包括信息资产、硬件资产和软件资产。

Corporate assets refer to the information and related resources that are valuable to the Company and are the protected object of information security policies, including information assets, hardware assets and software assets.

固定资产是指使用年限超过一年的房屋、建造物、机器设备、运输设备、IT 设备和单位价值在 5000 元以上（含）的仪器仪表、设备、工量器具及不属于生产经营活动的设备。

Fixed assets refer to the following with a service life of more than one year: houses, buildings, machinery equipment, transportation equipment, IT equipment; instruments & meters, equipment and measuring apparatuses with a unit value of more than CNY 5,000 (inclusive); and equipment not belonging to production and business activities.

保护公司资产

SUNWODA 欣旺达

公司资产是公司稳健发展的物质基础。员工有责任爱护公司财物，确保公司的资产不被滥用或浪费，若发现遗失应立即向行政中心、财务中心或信息中心等相关部门报告，因不当使用而损坏应予赔偿。

Corporate assets are the material basis for the Company's steady development. Employees have the responsibility to take good care of the Company's property and ensure that the corporate assets are not abused or wasted. In case of any loss, employees should immediately report to relevant departments such as Administrative Center, Finance Center or Information Center. Damages due to improper use should be compensated.

对于每一类信息资产，资产责任人必须根据其机密性、完整性、可用性三个角度确定它的安全保护和措施，并且指定资产管理人来执行这些安全措施。对于信息资产的保密要求严格按照《信息资产保密管理规定》相关规定执行。

For each type of information asset, the person responsible for the asset must determine its safety protection and use measures based on its confidentiality, integrity, and availability, and designate an asset manager to implement these safety measures. The confidentiality requirements for information assets are strictly implemented in accordance with the *Management Regulations on Confidentiality of Information Assets*.

在未经公司批准和授权的情况下，员工不得擅自挪用、外借、出售公司资产。在国家法律许可和公司内部制度的范围内，公司有权监察员工如何运用公司资产。

Employees shall not embezzle, lend or sell corporate assets without the approval and authorization of the Company. The Company has the right to monitor how employees use corporate assets to the extent permitted by national laws and the Company's internal system.

4 知识产权与商业秘密保护

4. Protection of Intellectual Properties and Trade Secrets

4.1 知识产权

4.1 Intellectual properties

知识产权是指本公司职工在执行本公司的任务或主要是利用本公司的物质技术条件完成的职务智力劳动成果及根据国家法律规定取得或享有的权利，包括专利权、商标权、著作权（含计算机软件）、商业秘密（技术秘密和经营秘密）、集成电路布图设计权、知名商品特有的名称、包装盒装潢以及公司名称、网站域名等法律法规规定保护的其他知识产权。

Intellectual properties refer to the intellectual work achievements of the Company's employees in performing the Company's tasks or fulfilled by mainly using the Company's material and technical conditions,

and the rights obtained or enjoyed in accordance with national laws, including patent rights, trademark rights, copyrights (including computer software), trade secrets (technical secrets and business secrets), integrated circuit layout design rights, the unique name and packaging decoration of well-known goods, company name, website domain name, and other intellectual properties protected by laws and regulations.

公司注重知识产权的实施、保护和管理，促进知识产权应用，鼓励员工发明创造，提高公司市场竞争力和经济效益。

The Company pays attention to the implementation, protection and management of intellectual properties, promotes the application of intellectual properties, and encourages employees to invent and create, so as to improve the market competitiveness and economic benefits of the Company.

为了确保公司产品不侵犯他人知识产权，公司规定了风险技术点的提出、分析、反馈机制：研发人员确认待分析项目，提交详细的风险点说明及《侵权分析请示》，经部门负责人和总经理签核后移交至法务组。知识产权专员可根据侵权分析项目所涉及到的风险点数量、复杂度、分析检索范围等因素确定是自行进行侵权分析还是请专利代理机构进行侵权分析。

In order to ensure that the Company's products do not infringe the intellectual properties of others, the Company stipulates the proposal, analysis and feedback mechanism of risk technology points: R&D personnel confirm the items to be analyzed, submit a detailed description of risk points and the *Infringement Analysis Request*, and after signing and approval by the department head and the general manager, hand them over to the legal affairs team. Intellectual property specialists can determine whether to conduct infringement analysis on their own or to ask a patent agency to conduct infringement analysis based on factors such as the number, complexity, and analysis and search scope of risk points involved in the infringement analysis items.

4.2 商业秘密保护

4.2 Protection of trade secrets

商业秘密是指不为公众所知悉、具有商业价值并经权利人采取相应保密措施的技术信息、经营信息等商业信息。

Trade secrets refer to commercial information such as technical information and business information, which is not known to the public and has commercial value and for which the rights holder has adopted the corresponding confidentiality measures.

随着公司业务的快速发展，商业秘密的重要性也越来越突出，公司注重加强员工的保密意识，有力地

实施保密管理工作，防止公司商业秘密的泄漏和流失。

With the rapid development of the Company's business, the importance of trade secrets is becoming more and more prominent. The Company pays attention to strengthening the confidentiality awareness of employees, and effectively implements the confidentiality management, to prevent the disclosure and loss of the Company's trade secrets.

为避免公司存在信息或技术的泄露，详细制定了商业秘密内容、涉密人员、涉密区域的管理办法。

In order to avoid information or technology disclosure, the Company has formulated detailed management measures for the contents of trade secrets, and secret-related personnel and areas.

其中商业秘密内容包括技术开发信息、市场营销信息（含客户名单、客户信息资料、礼品清单、营销计划、合同、报价体系、定价体系等）、组织管理信息、生产制造信息、法律事务信息、资金财务信息、人力资源信息（含工资）、物料采购信息、文件、部门文件、ERP 系统中的所有信息、及其他属于商业秘密的资料。

The contents of trade secrets include technology development information, marketing information (including customer lists, customer information, gift lists, marketing plans, contracts, quotation systems, pricing system, etc.), organization and management information, production and manufacturing information, legal affairs information, capital and financial information, human resources information (including salary), material purchase information, documents, department documents, all information in ERP system, and other data belonging to trade secrets.

涉密人员是指因工作需要，在生产经营中产生、管理、掌握或经常接触公司秘密的人员，其所掌握的公司秘密一旦泄露，将给公司的安全和利益造成一定损害。

Secret-related personnel refer to those who generate, manage, master or often have access to the Company's secrets in production and operation due to work needs. Once the Company's secrets they master are disclosed, certain damages will be caused to the safety and interests of the Company.

涉密区域是指本公司内部经常产生、处理商业秘密或集中生产、存放、保管大量涉密载体/物品的部门/区域，主要包括技术/设备开发、生产、检验、试验、仓储等部门/区域。

Secret-related areas refer to the departments/areas within the Company that often generate and process trade secrets or centrally produce, store and keep a large number of secret-related carriers/articles, mainly including departments/areas for technology/equipment development, production, inspection, test, storage, etc.

SUNWODA 欣旺达

5 信息披露与对外宣传

5. Information Disclosure and External Publicity

5.1 信息披露

5.1 Information disclosure

公司作为上市公司，需履行上市公司的披露义务，以上市公告书、定期报告、临时报告等形式，把公司及与公司相关的信息，向投资者和社会公众公开披露。参与信息披露或者已知提供的数据会用于信息披露的每个员工须确保信息披露的真实性、准确性、完整性以及及时性。

As a listed company, the Company shall fulfill the disclosure obligation by publicly disclosing its information and information related to it to investors and the public in the form of listed company statement, periodic report, interim report, etc. Each employee who participates in information disclosure or knows that the data provided will be used in the disclosure shall ensure the truthfulness, accuracy, completeness and timeliness of the disclosure.

5.2 对外宣传

5.2 External publicity

战略合作与品牌管理部为公司官方唯一的对外宣传机构，负责公司对外宣传工作的统筹和管理。员工或部门禁止未经授权私自对外发布公司信息（例：接受媒体采访、发布产品信息等）。

As the only official external publicity organization of the Company, Strategic Cooperation and Brand Management Department is responsible for the overall planning and management of the Company's external publicity work. Employees or departments are prohibited from releasing company information without authorization (such as accepting media interviews, and releasing product information).

公司所有对外宣传平台由战略合作与品牌管理部统一管理，员工或部门未经战略合作与品牌管理部授权，私自以公司或部门名义开通宣传平台。

All external publicity platforms of the Company are managed by Strategic Cooperation and Brand Management Department. Employees or departments are prohibited from opening publicity platforms in the name of the Company or department without the authorization of Strategic Cooperation and Brand Management Department.

员工或部门对外宣传须做到遵守公司保密纪律，维护公司利益，发布的信息须真实、准确，严禁发布不实、不健康等违规信息。

Employees or departments must comply with the Company's confidentiality discipline and protect the Company's interests in external publicity. The information released must be true and accurate. It is strictly forbidden to release false, unhealthy and other illegal information.

6 环境保护

6. Environmental Protection

我国在 2020 年 9 月的联合国大会上承诺力争于 2030 年达到二氧化碳排放峰值，并于 2060 年前实现碳中和。本公司作为新能源产业的领军企业之一，必须将节能工作落到实处。

At the General Assembly of the United Nations in September 2020, China pledged to strive to reach peak carbon dioxide emissions by 2030 and achieve carbon neutrality by 2060. The Company, as one of the leading enterprises in the new energy industry, must implement energy conservation effectively.

2020 年，欣旺达及 11 家子公司均已通过 ISO14001 环境管理体系认证，本公司亦已完成清洁生产审核，并获得绿色工厂认证。各事业部以本公司的发展战略为标杆，订下每单位万元产值每年降耗 6% 的具体目标，并签订节能减排目标责任状。

In 2020, Sunwoda and its 11 subsidiaries passed ISO14001 environmental management system certification. The Company has also completed cleaner production audits and obtained green factory certification. Taking the Company's development strategy as the benchmark, each business division has set a specific objective of reducing consumption by 6% per CNY 10,000 output value per year, and signed a letter of responsibility for energy conservation and emission reduction objective.

6.1 环境管理

6.1 Environmental management

本公司严格遵守 ISO14001 环境管理体系要求及环境相关法律法规，设有完善的环境管理体系及制度，致力全面完成节能减排目标，将本公司对环境的影响降至最低。公司全体员工积极推动落实具体的环境管理措施，包括废气、废水、废弃物排放管理及第三方检测、绿色采购等工作，于每季度召开会议总结环境管理工作。各子公司根据自身情况设立环境管理专职团队，并依据公司内部制度实施环境因素识别、定期审核、培训、环保预警等程序。

The Company strictly abides by the requirements of ISO14001 environmental management system and relevant environmental laws and regulations, has a complete environmental management system, and is committed to fully achieving the objective of energy conservation and emission reduction to minimize the impact

of the Company on the environment. All employees of the Company actively promote the implementation of specific environmental management measures, including discharge management of waste gas, wastewater and wastes, third-party testing, green purchase, etc. Meetings are held every quarter to summarize environmental management work. Each subsidiary establishes a full-time environmental management team based on their own situation, and implements procedures for identification of environmental factors, regular audits, training, and environmental protection warnings in accordance with the Company's internal system.

6.2 能源管理

6.2 Energy management

本公司制定并实施《能源管理规定》，积极推动能源管理体系的建设。公司设有由董事长领导的节能委员会，其中，由行政部门负责节能工作的推行。节能委员会负责检查节能进度、宣传节能理念及推广节能技术等。目前，公司已完成 ISO50001 能源管理体系认证。

The Company formulates and implements the *Energy Management Regulations* and actively promotes the construction of an energy management system. The Company has an Energy Conservation Committee led by the chairman of the Board of Directors, and the Administrative Department is responsible for the advancement of energy conservation. The Energy Conservation Committee is responsible for checking the progress of energy conservation, publicizing the concept of energy conservation and promoting energy conservation technology. At present, the Company has completed ISO50001 energy management system certification.

本公司积极响应国家号召，持续推进绿色低碳产业的发展，大力推动清洁技术的使用。我们长期以来布局新能源产业，以锂离子电池产业为核心，业务覆盖上游动力电芯制造等关键环节，及下游储能电站、电池回收等产业，形成全产业链一体化的事业蓝图。

The Company actively responds to the national call, continuously promotes the development of green and low-carbon industries, and vigorously promotes the application of clean technologies. We have been deploying the new energy industry for a long time, with the lithium-ion battery business as the core, which covers key upstream links such as power cell manufacturing, as well as downstream links such as energy storage power stations, and battery recycling, forming a business

6.3 绿色办公

6.3 Green office culture

本公司积极践行绿色办公文化，要求全体员工从细节入手，节约用水、用电及办公室用品。通过营造

绿色办公的氛围，提高员工的节能意识，致力降低碳排放。为鼓励及调动员工的节能积极性，本公司制定奖赏制度，将节能委员会的负责人及相关负责人员的薪酬及绩效与节能成效挂钩。

The Company actively practices green office culture, starting with requiring all employees to focus on details such as saving water, electricity and office supplies. By creating a green office atmosphere, the Company aims to improve employees' awareness of energy conservation and strive to reduce carbon emissions. In order to encourage and mobilize employees' enthusiasm for energy conservation, the Company formulates a reward system to link the salary and performance of both the head of Energy Conservation Committee and relevant responsible personnel with the energy conservation effect.

7 产品与服务质量

7. Quality of Products and Services

7.1 质量管理

7.1 Quality management

本公司践行“客户导向、品质卓越、遵纪守法、经济环保、全员参与、持续改进”的质量方针，设立完善的产品质量管理体系，确保产品及服务质量。本公司严格把控生产过程的各环节，以保障我们产品及服务的质量满足客户的要求。

The Company implements the quality policy of "customer orientation, excellent quality, law-abiding, economic and environmental protection, full participation and continuous improvement", and established a complete product quality management system to ensure the quality of products and services. The Company strictly controls all links of the production process to ensure that the quality of our products and services meet the requirements of customers.

7.1.1 质量管理体系

7.1.1 Quality management system

我们根据 ISO9001: 2015、QC080000: 2017 标准制定《质量&HSF 手册》，建立贯穿物料采购、产品设计与开发、产品生产及售后服务等全流程的质量管理体系。此外，公司每年对质量管理体系进行一次全面内审，以及时识别潜在问题并采取改进措施，确保体系的有效性。

Based on ISO9001: 2015 and QC080000: 2017 standards, we have formulated the Quality & HSF Manual, and established a quality management system throughout the whole process of material purchase, product design and development, product production and after-sales service. Besides, the Company conducts a comprehensive

internal audit on the quality management system every year to identify potential problems in time and take improvement actions, ensuring the effectiveness of the system.

截至目前，欣旺达及其旗下 14 家子公司均已通过 ISO9001 质量管理体系认证，部分公司已通过 QC080000 认证、ISO13485 医疗器械质量管理体系认证及 IATF16949 汽车行业质量管理体系认证。此外，我们还拥有多个国内及国际产品认证。

So far, Sunwoda and its 14 subsidiaries have passed ISO9001 quality management system certification, and some have passed QC080000 certification, ISO13485 medical device quality management system certification and IATF16949 automobile quality management system certification. In addition, we also have obtained several domestic and international product certifications.

7.1.2 质量控制

7.1.2 Quality control

我们设有不合格品控制、有害物质管理及标识可追溯性等多个流程制度。本公司引入先进质量工具，包括精益六西格玛、质量管理小组（QCC）、提案改善活动等，并对于活动中表现优秀的员工给予表彰。通过多种形式的活动，提高员工对质量理念的认同感及质量管理能力。

We have established process systems for non-conforming product control, hazardous substance management, identification and traceability, etc. The Company introduces advanced quality tools, including Lean Six Sigma, quality control circle (QCC), proposal improvement activities, etc., and commends outstanding employees in the activities. Through various forms of activities, the Company aims to improve employees' recognition of the quality concept and quality management capabilities.

公司各级管理人员，包括从总经理到各基层管理人员，其薪酬绩效均与质量绩效挂钩，年度考核标准中都会包括产品质量的关键绩效指标。本公司亦于每年初制定质量目标，并将质量绩效目标从上而下逐一分解，各级员工均承担质量责任。

The performance-related pay of the management at all levels, including general manager and all junior management personnel, is linked with quality performance, and the key performance indicators of product quality are included in the annual assessment standards. The Company also formulates quality objectives at the beginning of each year and decomposes these objectives in details from top to bottom so that employees at all levels are responsible for quality.

质量控制

SUNWODA 欣旺达

7.2 客户服务

7.2 Customer service

本公司以客户为中心，通过了解客户的需求及期望，致力为客户提供契合诉求、超越期待的产品及服务。

Taking customers as the center, the Company is committed to providing customers with products and services that meet their demands and exceed their expectations by learning about their needs and expectations.

7.2.1 客户满意度

7.2.1 Customer satisfaction

本公司通过访谈、社群调查、行业展会、客户满意度调查等渠道与客户保持密切沟通，及时获取客户的需求与期望。通过开展客户满意度调查、不定期走访客户等方式了解客户满意度。我们主要从工程支持能力、执行力度、品质管控、技术创新及社会责任等维度，对海内外客户进行调研，通过分析客户的需求，

及时发现并解决问题，进而为客户提供优质的服务，提升客户满意度。

The Company maintains close communication with customers through interview, community investigation, industry exhibition, customer satisfaction investigation and other channels to obtain customers' needs and expectations in time. We learn about customer satisfaction by conducting customer satisfaction investigations, visiting customers from time to time, etc. We conduct research on customers at home and abroad mainly from aspects such as engineering support ability, execution strength, quality control, technological innovation and social responsibility, find and solve problems in time by analyzing customers' needs, so as to provide customers with high-quality services and improve customer satisfaction.

7.2.2 反馈及投诉机制

7.2.2 Feedback and complaint mechanism

本公司设有《客户投诉处理流程》等制度，客户可通过邮箱、电话、微信及面谈等方式提出反馈及意见。在接收客户意见后，我们遵照“2485 原则”及时回应客户。当客户就品质问题提出投诉时，本公司及时召集各相关部门、供应商及第三方验证机构等相关人员组成改善小组（“8D 小组”）。

The Company has systems such as *Processing Flow for Customer Complaints*. Customers can give feedback and comments through e-mail, telephone, WeChat and interview. After receiving customers' comments, we respond to customers in a timely manner in accordance with the "2485 principle". In case of complaints about quality problems by customers, the Company will convene relevant personnel from relevant departments,

客户满意度

反馈及投诉机制



suppliers and third-party verification institutions in time to form an improvement team ("8D team").

8 安全生产

8. Safety Production

8.1 职业健康安全

8.1 Occupational health and safety

欣旺达设立安全管理委员会（“委员会”），由总经理担任主席，分管运营、安全的高管分别担任副主席，各部门派代表担任委员会成员。委员会负责对安全管理体系、车间安全生产、消防、职业卫生及健康等方面进行全面的职业健康安全管理。各子公司依据自身实际情况，设有独立的职业健康安全架构或专职团队。公司全体员工均应当严格遵守职业健康安全的相关法律法规，并按照 ISO45001:2018 标准的要求建立、运行和持续改进完善职业健康安全管理体系。

Sunwoda has established Safety Management Committee (the "Committee"), with the general manager as the chairman, senior managers respectively in charge of operations and safety as vice chairmen, and department representatives as members. The Committee is responsible for the overall control of occupational health and safety in the aspects of safety management system, safety production in the workshop, fire fighting, occupational hygiene and health, etc. Each subsidiary establishes an independent occupational health and safety structure or a full-time team based on their own actual situation. All employees of the Company shall strictly abide by the relevant laws and regulations on occupational health and safety. The Company also establishes, operates and continuously improves the occupational health and safety management system in accordance with the requirements of the ISO45001:2018 standard.

8.2 安全培训

8.2 Safety training

为提高全体员工的安全意识及应对安全事故的能力，公司有序开展多样化的安全培训，包括三级安全教育培训、重点岗位安全培训、特种作业人员的安全技术培训等。全体员工应当积极配合参与公司组织的各项培训，结合安全演练、安全生产和安全知识竞赛、安全视频等多种方式学习掌握相关知识。

In order to improve the safety awareness of all employees and their ability to respond to safety accidents, the Company conducts various safety training activities in an orderly manner, including three-level safety education and training, safety training for key positions, and safety technology training for special operators. All employees

should actively cooperate and participate in various training activities organized by the Company, and learn and master relevant knowledge in a variety of ways, such as safety drills, safety production & safety knowledge competitions, and safety videos.

9 信息安全与隐私保护

9. Information Security and Privacy Protection

9.1 信息安全

9.1 Information security

员工使用的软硬件设备和数据都属于公司财产，包括存储在个人和公司设备上的数据。不当使用可能会使公司蒙受损失，如：网络病毒入侵、设备丢失或损坏等。

The software & hardware equipment and data (including data stored on personal and company equipment) used by employees belong to the Company's property. Improper use including network virus intrusion, equipment loss or damage, etc. may cause losses to the Company.

为保证计算机系统及网络正常运行，所有计算机操作人员需遵守相关法律法规，不得私自加载可能影响运行或网络安全的软件，不得私自卸载公司防病毒软件或禁止防病毒软件更新补丁或防护软件定期自动扫描，不得安装“黑客”软件和工作学习以外的软件。

In order to ensure the normal operation of computer system and network, all computer operators must abide by relevant laws and regulations, and shall not load software that may affect operation or network security without permission, uninstall the Company's anti-virus software without permission, or prohibit the anti-virus software from updating patches or the protective software from conducting regular automatic scanning, and shall not install "hacker" software and software for purposes other than work and study.

员工设置的公司网络、邮箱账号、个人信息系统密码需 8 位或以上，并由大小写字母，特殊符号以及数字组成，定期（90 天）改变个人口令，不得私自将账号密码告知他人或私自使用他人账号密码登录系统，公司系统权限管理人员应根据要求及时对离职或调岗人员权限进行清理或变更处理。

The passwords for the company network, e-mail account and personal information system set by employees shall be 8 characters or more, and shall be composed of upper and lower case letters, special symbols and numbers. Personal passwords shall be changed regularly (every 90 days). Employees shall not disclose the account password to others or use others' account password to log in to the system without permission. The system authority management personnel of the Company shall promptly cancel or change the authority of the

personnel who leave or are transferred to another post as required.

外部人员若需长期驻点公司，入厂前，需签订“外部人员保密协议”，并严格遵守条例以及协议里面的内容。外部人员在公司期间，必须严格遵守公司的相关规定，按规定使用设备和网络；未经允许，严禁进入生产区域、仓库区域或其他敏感特殊区域。若因项目或工作需要，必须得到相关批准，且有我方人员进行全程陪同，方可进入，严禁对泄露与工作无关的公司信息。

If external personnel need to stay in the Company for an extended period of time, they shall sign a "confidentiality agreement for external personnel" before entering the factory and strictly abide by the regulations and the contents of the agreement. External personnel shall strictly abide by the relevant regulations of the Company and use the equipment and network according to the regulations during their stay in the Company. Do not enter the production area, warehouse area or other sensitive special areas without permission. If it is necessary to enter such areas due to the project or work, external personnel must obtain relevant approval and be accompanied by our personnel throughout the process. It is strictly prohibited to disclose company information unrelated to the work.

9.2 隐私保护

9.2 Privacy protection

个人信息是指以电子或者其他方式记录的能够单独或者与其他信息结合识别自然人个人身份的各种信息，包括但不限于自然人的姓名、出生日期、身份证件号码、个人生物识别信息、住址、电话号码等。

Personal information refers to all kinds of information recorded electronically or in other ways that can be used to identify the personal identity of a natural person independently or in combination with other information, including but not limited to the name, date of birth, ID number, personal biometric information, address, telephone number, etc. of a natural person.

敏感信息包括但不限于客户资料、客户交易信息、公司员工资料、公司财务信息、公司信息系统架构和源代码和其它非公开的信息。

Sensitive information includes but is not limited to customer information, customer transaction information, company employee information, company financial information, architecture and source code of the company information system, and other non-public information.

隐私保护是指个人或集体等实体不愿意被外人知道的信息得到应有的保护。

Privacy protection refers to the due protection of information that individuals or collectives and other

entities do not want to disclose to the outsiders.

公司尊重和保护员工、客户和其他合作伙伴的个人信息和隐私。保护公司数据是每位员工的责任。

The Company respects and protects the personal information and privacy of employees, customers and other partners. It is the responsibility of every employee to protect the data of the Company.

员工应仅在出于合法商业需要或者为满足特定法律或政策规定的情况下收集、存储、处理和使用个人信息。个人信息的收集、处理、披露和保留须符合合法性、透明性、公平性和目的限定等原则。员工须通过必要的加密措施保护数据准确性和完整性；防止未经授权的数据访问、篡改、分享、传输、

丢失或被盗。如出于合法商业目的需要传递或共享个人信息，须得到合理授权，并对数据进行必要的加密。

Employees should only collect, store, process and use personal information for legitimate business needs or compliance with specific laws or policies. The collection, processing, disclosure and retention of personal information must comply with the principles of legality, transparency, fairness and purpose limitation. Employees must protect data accuracy and integrity through necessary data encryption or information measures to prevent unauthorized data access, tampering, sharing, transmission, loss or theft. If personal information needs to be transmitted or shared for legitimate business purposes, proper authorization shall be obtained and the data must be encrypted as necessary.

公司与客户合作时，数据的生成、导入、导出均应满足公司的数据质量、数据标准和数据安全要求。数据导出应采取“最小化”原则，根据业务应用需要，仅导出经审批通过或经授权的最小数据集。数据导出后原则上应对敏感信息进行脱敏，因实际业务必须使用敏感信息，应确保数据安全。数据导出后，在数据传递、保存等环节应由数据持有人采取文件加密、设置访问权限等安全措施，并将数据去向严格控制在申请时提出的传播范围内，不得提供给无关人员。

During cooperation with customers, the generation, import and export of data shall meet the requirements of the Company for data quality, data standards and data security management. The principle of "minimization" shall be adopted for data export. Only the approved or authorized minimum data set can be exported according to the needs of business applications. In principle, sensitive information shall be masked after data export. If sensitive information must be used due to actual business, data security shall be ensured. After data export, the data holder shall take security measures such as file encryption and setting of access rights in the links of data transmission, storage, etc., and strictly control the destination of the data within the transmission range proposed at the time of application, and shall not provide it to unauthorized personnel.

SUNWODA 欣旺达

10 反垄断与公平竞争

10. Anti-monopoly and Fair Competition

垄断是指排除、限制公平竞争的行为。垄断行为破坏公平竞争的市场秩序，损害消费者和社会公共利益。

Monopoly refers to the conducts of excluding or restricting fair competition. Monopolistic conducts disrupt the market order for fair competition and damage the interests of both consumers and the public.

欣旺达及所有员工在参与市场竞争的过程中应遵守适用的反垄断、反不正当竞争法律法规及公司《商业道德管理规定》，避免出现垄断或不正当竞争行为，如滥用市场支配地位、与竞争者达成垄断协议、虚假宣传等。

During the market competition, Sunwoda and all its employees shall abide by the applicable laws and regulations on anti-monopoly and anti-unfair competition as well as the *Management Regulations on Business Ethics* of the Company to avoid monopolistic or unfair competition conducts, such as abusing of market dominance, monopoly agreements with competitors, and false propaganda.

11 反洗钱

11. Anti-money Laundering

洗钱是指单位或个人将违法所得的资金或资产，通过各种手段掩饰或隐瞒其来源和性质，以使其在形式上合法化的犯罪行为。

Money laundering refers to the criminal conduct when an organization or individual covers up or conceals the source and nature of illegally obtained funds or assets through various means in order to legalize them in form.

欣旺达及所有员工应遵守适用的反洗钱法律法规及公司相关财务制度，审慎确认客户、商业伙伴和其他第三方的身份、资金来源等，以避免参与或被利用于洗钱活动。

Sunwoda and all its employees shall abide by the applicable laws and regulations on anti-money laundering and relevant financial systems of the Company, and prudently confirm the identity and source of funds of customers, business partners and other third parties, so as to avoid participating in or being used in money laundering activities.

12 会计与财务合规

12. Accounting and Financial Compliance

公司财务部门已经建立完善的内部财务管理、监督制度，确保财务活动的规范性和合法性，定期对会计核算和财务管理进行自查，并按照有关规定接受上级单位和相关部门的监督检查。规范财务部门工作和人员管理，确保公司的各类财务分析报告满足公司生产经营的需要，并能定期编制并监控并推进经营水平的改进。

The Finance Department of the Company has established a sound internal financial management and supervision system to ensure the standardization and legitimacy of financial activities, regularly conducts self-examination on accounting and financial management, and accepts the supervision and inspection of superior authority and related departments in accordance with relevant regulations. By standardizing the work and personnel management of Finance Department, the Company ensures that all financial analysis reports can meet the needs of the Company's production and operation, and can be regularly prepared and used to monitor and promote the improvement of operation level.

公司会计工作岗位设置实行管制度，即凡涉及到资金和资产的收付、结算及登记，必须由两人或两人以上分工办理，相互制约。会计工作岗位可以一人一岗，出纳人员不得兼管审计工作、会计档案保管工作和收入支出、债权债务账目的登记工作。

The Company implements the internal check system for accounting posts, that is, any receipt, payment, settlement and registration of funds and assets shall be handled by two or more persons according to their division of labor for mutual check. One accounting post may be held by one person, and the cashier shall not concurrently take charge of the audit work, the custody of accounting files, and the registration of income & expenditure and claims & debts.

银行预留印鉴应分人保管，作为预留印鉴使用的单位盖章或财务专用章由会计保管，作为预留印鉴使用的财务负责人私章由出纳人员保管。使用时由分管人员审核有关凭证后亲自盖章，严禁他人代盖。

The bank reserved seals shall be kept by different persons. Among them, the official seal or the special seal for finance shall be kept by the accountant, and the private seal of the financial officer shall be kept by the cashier.

For the use of these seals, the persons in charge shall check the relevant vouchers and then affix seals in person. Affixing seals by others is strictly forbidden.

会计人员应当持有会计从业资格证方可上岗，未取得会计从业资格证的人员不得从事会计工作。同时，会计人员应为在职在编人员，临时工和劳务派遣人员不得从事会计工作。

Accounting personnel shall hold Certificate of Accounting Professional before taking up their posts. Persons who have not obtained this certificate shall not engage in accounting work. At the same time, accounting personnel shall be regular employees, casual workers and labor dispatched personnel shall not be engaged in accounting work.

13 商业伙伴管理

13. Management of Business Partners

商业伙伴是指所有向公司提供货物或服务的个人或企业，包括但不限于供应商、承包商、经销商、渠道商、居间商、顾问、代理商等。

Business partners refer to all individuals or enterprises providing goods or services to the Company, including but not limited to suppliers, contractors, distributors, channels, intermediaries, consultants, agents, etc.

公司在开展商业合作时应审慎甄选商业伙伴，并对其进行尽职调查及合规风险评估，明确要求商业伙伴签署并遵循公司《供应商合作基本准则》、《廉洁共建协议》、《诚信廉洁承诺函》等诚信合规政策。

When conducting business cooperation, the Company shall prudently select business partners, conduct due diligence and compliance risk assessment on them, and clearly require them to sign and abide by the Company's integrity and compliance policies such as *Basic Criteria for Supplier Cooperation*, *Integrity Co-construction Agreement*, and *Letter of Commitment to Integrity*.

14 反腐败与反商业贿赂

14. Anti-corruption and Anti-commercial Bribery

腐败是指不诚信或不合法的行为，贿赂是其中一种常见的腐败行为。商业贿赂是指公司及其员工为了获取或保持业务或商业行为中的其他不当利益，直接或间接向商业伙伴、第三方输送或从商业伙伴、第三方处获得不当利益（包括但不限于提供金钱或其他任何有价物品或服务）的行为。

Corruption refers to dishonest or illegal conducts, and bribery is one of the common corrupt conducts. Commercial bribery refers to the conducts of a company and its employees to directly or indirectly transfer or obtain improper benefits (including but not limited to the provision of money or any other valuable goods or services) to or from business partners or third parties in order to obtain or maintain other improper benefits in business or commercial activities.

欣旺达对一切形式的腐败、贿赂行为采取“零容忍”态度，严禁员工或商业伙伴任何形式的行贿、索贿

商业伙伴管理

反腐败与反商业贿赂

SUNWODA 欣旺达

受贿或其他可能被认定为贿赂的不正当行为。所有员工和商业伙伴必须严格遵守适用的反贿赂法律法规，遵守公司《反贿赂合规管理规定》、《廉洁道德行为管理规定》等相关反贿赂政策和制度。

Sunwoda adopts a "zero tolerance" attitude towards all forms of corruption and bribery, and strictly prohibits any form of bribery, solicitation and acceptance of bribes by employees or business partners, or other improper conducts that may be identified as bribery. All employees and business partners must strictly abide by the applicable laws and regulations on anti-bribery, as well as relevant anti-bribery policies and systems of the Company such as *Management Regulations on Anti-bribery Compliance*, and *Management Regulations on Integrity and Ethical Conduct*s.

15 利益冲突

15. Conflict of Interest

利益冲突是指员工个人利益与公司利益或个人利益与所承担的岗位职责间发生或可能发生的冲突。一旦员工从事牺牲公司利益为代价的活动或借此获取个人利益就会产生利益冲突。员工利益与公司利益冲突时，员工廉洁自律原则，员工应以公司利益为先：

Conflict of interest refers to the conflict that occurs or may occur between the personal interests of employees and the interests of the Company, or between the personal interests and the job responsibilities. Once an employee engages in activities at the expense of the Company's interests or gains personal benefits, there will be conflict of interest. In case of conflict of interest between employees and the Company, employees shall follow the principle of integrity and self-discipline and put the Company's interests first:

(1) 不得贪污、挪用资金、收受商业贿赂、渎职行为以及其他玷污职务廉洁性的行为。

(1) No embezzlement, misappropriation of funds, acceptance of commercial bribes, dereliction of duty or other acts that defile the honesty of duties shall be allowed.

(2) 不得用损害公司利益换取个人在物质和非物质方面的利益行为。

(2) Employees shall not damage the interests of the Company for their personal interests in material and non-material aspects.

(3) 不得有损害公司形象和声誉的行为，不得擅自在外兼职，禁止员工同业经营。

(3) Employees shall not damage the Company's image and reputation, nor take part-time jobs outside the Company without authorization or do business in the same industry.

(4) 在经营过程中，不得损害公司利益以各种方式截留、转移公司资金或收益。

(4) Employees shall not damage the Company's interests by withholding or transferring the Company's funds or income in various ways in the course of business operation.

(5) 不得以虚报、谎报等手段获取荣誉及其他利益，不得弄虚作假，谎报成绩，不得授意、指使、强令财会人员或其他人员做假账。

(5) Employees shall not obtain honor and other benefits by means of false reporting or mis-reporting, nor falsify achievements, or incite, instigate or force accounting personnel or others to make false accounts.

(6) 对公司重大失职人员或事件、有损公司利益的事情，不得知情不举、瞒案不报和压案不查。

(6) Employees shall not ignore the Company's major dereliction of duty or events or matters detrimental to the Company's interests, nor conceal or suppress such cases.

(7) 不得制造假象，伪造、藏匿、销毁证据，隐瞒真相，歪曲事实，推卸和逃避责任。

(7) Employees shall not create false impression, forge, hide or destroy evidence, conceal the truth, distort the facts, shirk or evade responsibility.

(8) 不得利用职权或利用涉及公司经营、财务和其它对公司证券市场价格有重大影响信息，为其个人或家庭成员或其他人牟取非法或不正当利益。

(8) Employees shall not seek illegal or improper interests for themselves or their family members or others by taking advantage of their powers or using information related to the Company's operation, finance and other information that has a significant impact on the Company's securities market price.

16 礼品招待

16. Gifts and Entertainment

公司或公司员工在开展业务活动中出于商业礼仪、当地风俗的考量，可以在合理范围内提供/接受与工作相关的恰当、合法的商务礼品或招待。

During business activities, the Company or its employees may offer/accept appropriate and legal business gifts or entertainment related to the work within a reasonable range in consideration of business etiquette and local customs.

欣旺达禁止为获取、保留业务或谋求特殊待遇等不正当利益为目的而提供/接受礼品或招待，禁止提供/接受现金、现金等价物或其他价值过高的礼品或招待。所有员工在提供/接受礼品和招待的，应遵守公司《廉洁道德行为管理规定》、《员工收受礼品管理细则》、《业务费用报销管理规定》等相关制度和流程。

Sunwoda prohibits offering/accepting gifts or entertainment for the purpose of obtaining and retaining

礼品招待

SUNWODA 欣田送

business or seeking special treatment and other improper benefits, and prohibits offering/accepting cash, cash equivalents or other gifts or entertainment of higher value. When offering/accepting gifts and entertainment, all employees shall abide by the Company's relevant systems and procedures such as *Management Regulations on Integrity and Ethical Conducts*, *Management Rules for Employees to Receive Gifts*, and *Management Regulations on Reimbursement of Business Expenses*.

17 社会责任

17. Social Responsibility

17.1 慈善捐赠

17.1 Charitable donation

慈善捐赠是指公司为更好履行社会责任，树立良好的公众形象，建立和谐的企业文化，捐赠或资助慈善事业的社会活动。

Charitable donation refers to the Company's social activities to donate to or fund charity in order to better fulfill its social responsibilities, establish a good public image, and establish a harmonious corporate culture.

公司可以用于对外捐赠的财产包括现金、实物资产（包括库存商品、固定资产及其他有形资产等）。公司生产经营需用的主要固定资产、持有的股权和债权、受托代管财产、已设置担保物权的财产、权属关系不清的财产，或者变质、残损、过期报废的商品物资，不得用于对外捐赠。

The property that the Company can use for external donation includes cash and physical assets (including inventory goods, fixed assets and other tangible assets, etc.). Main fixed assets for production and operation of the Company, equity and creditor's rights held, properties under entrusted management, properties with security interest, properties with unclear ownership, or commodities and materials that have deteriorated, damaged or expired, shall not be used for external donation.

公司对外捐赠的类型：

Types of external donation made by the Company:

1. 救济性捐赠，即通过依法成立的非营利的公益性社会团体和公益性非营利事业单位向遭受重大自然灾害的地区以及困难的社会弱势群体和个人提供的用于生产、生活救济、救助的捐赠；

1. Relief donation, that is, the donation made to areas suffering from major natural disasters and socially

disadvantaged groups and individuals for relief and assistance of their production and living through non-profit public welfare social organizations and public welfare non-profit institutions established according to law;

2. 公益性捐赠，即向教育、科学、文化、卫生医疗、体育事业和环境保护，社会公共设施建设提供的捐赠；

2. Public welfare donation, that is, the donation made to education, science, culture, health and medical care, sports, environmental protection and the construction of social public facilities;

3. 其他捐赠，即除上述以外，公司出于弘扬人道主义目的或者促进社会发展与进步的其他社会公共福利事业捐赠。

3. Other donation, that is, other social and public welfare donation made by the Company for humanitarian purposes or to promote social development and progress in addition to the above.

公司对外捐赠的直接及最终受益人应为公益性社会团体和公益性非营利事业单位、社会弱势群体或者个人。

The direct and ultimate beneficiaries of the external donation made by the Company shall be public welfare social organizations, public welfare non-profit institutions, social disadvantaged groups or individuals.

公司对外捐赠后，不得要求受赠方在融资、市场准入、行政许可、占有其他资源等方面创造便利条件，不得以捐赠为名从事营利活动。捐赠财产的使用应当符合公益目的，不得将捐赠财产挪作他用。

After the Company makes external donation, it shall not require the recipient to create convenient conditions for financing, market access, administrative license, possession of other resources, etc., and shall not engage in profit-making activities in the name of donation. The donated property shall be used for public welfare and shall not be misappropriated for other purposes.

17.2 社区关系

17.2 Community relations

社区关系是指公司与所在地政府、社团组织以及全体居民之间的睦邻关系，直接影响着公司的生存环境和公众形象，是公司发展的社会根基。

Community relations refer to the good-neighborly relationship between the Company and the local government, social organizations and all residents, which directly affects the Company's living environment and

public image, and is the social foundation of the Company's development.

公司本着建立长期稳定健康的合作关系，相互尊重，互惠互利的原则，在公司经营所在地社区合法合规地开展各项项目运营和经营活动，以支持和发展当地社区经济，提高生活水平。

Based on the principles of establishment of long-term, stable and healthy cooperative relationships, mutual respect and mutual benefit, the Company conducts various project operations and business activities in the local community where the Company operates in accordance with the law, so as to support and develop the local community economy and improve the living standard.

公司尊重业务经营所在地的当地文化、生活方式以及传统习惯，公司通过阶段性的经营活动与当地社区以及其他利益相关方保持协调沟通合作，实施可持续性发展计划，建立牢固持久的友好互惠关系。

The Company respects the local culture, lifestyle and traditional habits of the place where its business is conducted. Through phased business activities, the Company maintains coordination, communication and cooperation with the local community and other stakeholders and implements sustainable development plans, to establish a firm and lasting friendly and mutually beneficial relationship.

公司承诺在生产经营的过程中减少和避免污染物排放，避免安全和环境事故，节约资源。公司积极履行合规义务，并与有关方保持沟通。

The Company promises to reduce and avoid pollutant discharge, avoid safety and environmental accidents and save resources in the process of production and operation. The Company actively fulfills its compliance obligations and keeps communication with relevant parties.

18. 境外业务合规

18. Compliance of Overseas Business

公司开展境外日常经营、对外货物和服务贸易、对外承包工程及境外投资等活动，应确保经营活动全流程、全方位合规，全面掌握关于劳工权利保护、环境保护、数据和隐私保护、知识产权保护、反腐败、反贿赂、反垄断、反洗钱、反恐怖融资、贸易管制、财务税收等方面的具体要求。

When carrying out overseas daily operation, foreign trade in goods and services, foreign contracted projects and overseas investment, the Company shall ensure the whole process and all-round compliance of business activities, and fully master the specific requirements on labor rights protection, environmental protection, data

and privacy protection, intellectual property protection, anti-corruption, anti-bribery, anti-monopoly, anti-money laundering, anti-terrorist financing, trade control, financial taxation and other aspects.

公司相关部门应当准确、完整记录并保留境外业务相关的合同、台账，加强单证管理、档案管理、加工贸易手册账务管理等环节。与此同时，建立并保持与境内外监管机构日常工作联系，跟踪和评估监管意见和监管要求的落实情况。积极落实改进机制管理规定，对在进出口业务工作中发现的风险和差错，定期汇总问题形成报告，并要求关务部门限期完成整改。

Relevant departments of the Company shall accurately and completely record and keep the contracts and standing books related to overseas business, and strengthen document management, file management, processing trade manual and accounting management, etc. At the same time, the Company establishes and maintains daily work contact with domestic and foreign regulatory agencies, tracks and evaluates the implementation of regulatory opinions and requirements. The Company actively implements the management regulations on the improvement mechanism, regularly summarizes the problems identified in the import and export business to form a report, and requires the Customs Affairs Department to complete the rectification within a time limit.

19. 合规咨询与举报

19. Compliance Consulting and Reporting

所有员工或商业伙伴发现任何违反公司合规政策或本准则的行为或事件时，应及时向风控审计中心举报。一经查实，酌情奖励。举报渠道如下：

All employees or business partners shall promptly report to Risk Control Audit Center when finding any conduct or event in violation of the Company's compliance policy or this Code. Once verified, reward will be given as appropriate. The reporting ways are as follows:

平台举报：<https://www.sunwoda.com/jubao>;

Platform: <https://www.sunwoda.com/jubao>;

电话举报：18126270617（微信同号）；

Telephone: 18126270617 (also WeChat ID);

邮箱举报：jubao@sunwoda.com;

E-mail: jubao@sunwoda.com;

当面举报：风控审计中心负责人/首席合规官；

Face to face: Head of Risk Control Audit Center/Chief Compliance Officer;

函件举报：将书面举报信通过邮局寄至深圳市宝安区石岩街道石龙社区颐和路 2 号，欣旺达电子股份有限

公司审计部负责人收。

Letter: Send a written report letter via post office to the head of Audit Department of Sunwoda Electronic Co., Ltd. (No. 2, Yihe Road, Shilong Community, Shiyan Street, Bao'an District, Shenzhen)

风控审计中心依据《举报受理及调查管理规定》受理案件并协助合规管理中心进行查处，跟踪举报案件处理结果并归档存查。

Risk Control Audit Center accepts cases in accordance with the *Management Regulations on Reporting Acceptance and Investigation*, assists the Compliance Management Center in investigating and dealing with cases, tracks the handling results of reported cases and files them for reference.

公司对举报人身份及举报信息进行严格保密，并制定《举报人保护管理规定》以加强对举报人的保护，严惩打击报复举报人的行为。

The Company keeps whistleblowers' identity and reporting information strictly confidential, and formulates the *Management Regulations on Whistleblower Protection* to strengthen the protection of whistleblowers and severely punish those retaliating against whistleblowers.

对于任何违反相关法律法规或欣旺达合规政策的行为，公司将依据《奖惩管理规定》对其进行惩处；情节严重构成犯罪的，公司或将移送司法机关。

The Company will punish those violating relevant laws and regulations or Sunwoda's compliance policies in accordance with the *Management Regulations on Rewards and Punishments*. If the circumstances are serious enough to constitute a crime, the Company may transfer the case to the judicial authority.

SUNWODA 欣旺达