

## 孚能科技合规准则

### Code of Compliance of Farasis

董事长致辞：

亲爱的孚能人，我们作为全球清洁能源可持续发展的先行者，在不断拓展公司业务的同时，应该深刻认识到企业的社会责任以及法治社会对企业日益严格的合规要求。

“合规”即“符合规定”，不论是进行国内还是国际贸易，我们应时刻谨记遵守法律法规、行业标准、客户标准，恪守商业道德；在内遵守规章制度流程，营造无障碍沟通、团结奋进的工作氛围，对外尊重对手、重视客户，持续不断地提升产品安全 and 质量，维护公平竞争、杜绝腐败的市场环境。

“孚守合规，能行万里”，合规不是成本，而是生产力。完善的合规体系从源头上规避合规风险，防患于未然，为公司的稳步发展提供有力保障。

合规不只关系公司的长远发展，更关系到每一位孚能人的工作体验，让我们从个人做起、从小事做起，秉持“求真务实，知行合一”的理念，将合规意识贯彻到日常工作的点滴中。如今，我们站在新的起点上，将继续坚守合规运营，在行业发展大潮中谱写新的篇章！

——王瑀

*Message from the Chairman:*

*Dear colleagues,*

*As pioneer of the global clean energy and sustainable development, Farasis, is deeply aware that taking corporate social responsibilities and fulfilling the increasing compliance requirements from all parts of society are crucial while we expanding business worldwide.*

*To be compliant means to meet the requirements from all the relevant parties. During the process of both domestic trade and international trade, we should keep complying with the applicable laws, regulations, industry standards, customer standards as well as business ethic. Internally, we stick to the company policies and procedures to enhance effective communication and cooperative working environment. Externally, we respect competitor and value customer by continuously following and protecting free and fair competition in the market and improving product safety and quality.*

*Compliance makes long-term success. A sophisticated compliance management system takes preventive measures to mitigate compliance risks from the source, which provides guarantee to steady development of the company.*

*Compliance does not only work on sustainable development of the company, but also affect every employee's work experience. Let us stick to the principle knowing-doing and implement compliance awareness into daily work. Today, standing at departure point, we will continue adhering compliant operation to write a new chapter in the tide of industry development.*

*Yu Wang*

## **第一章 目的 Purpose**

为践行企业文化,进一步规范孚能科技(赣州)股份有限公司及其下属分公司、子公司(以下简称“公司”)所有人员依法合规开展经营活动,根据相关法律法规、监管规定的要求,结合公司实际情况,制定本准则。

In order to practice corporate culture and further regulate all personnel of Farasis Energy (Ganzhou) Co., Ltd. and its subsidiaries and affiliates (hereinafter referred to as the “Company”) to carry out their business activities in compliance with relevant laws and regulations, the Company hereby formulate this Code of Compliance (the “Code”) based on the Company's actual situation and in accordance with relevant laws, regulations, and regulatory requirements.

## **第二章 范围 Scope**

本准则适用于公司全体员工以及代表公司从事经营活动的第三方。

This Code applies to all staff and representatives of the Company.

## **第三章 定义 Definitions**

**腐败行为:**指直接或间接地提供、给予、收受或索取有价值的物品,不正当地影响另一方的行为。

**欺诈行为:**指任何作为或不作为,包括失实陈述,即明知或不顾实情误导,或企图误导一方以获得财务或其它利益或者避免义务。

**串通行为:**指双方或多方之间的安排,图谋达到不正当目的,不当地影响另一方的行为。

**胁迫行为:**指直接或间接地削弱或伤害、威胁削弱或伤害任何一方或其财产,不正当地影响一方的行为。

**妨碍行为:**指故意破坏、伪造、改变或隐瞒调查所需的证据材料或向调查人员提供虚假材料,企图严重妨碍对腐败行为、欺诈行为、胁迫行为或串谋行为指控进行的调查;威胁、骚扰或胁迫任何一方使其不得参与调查或透露与调查相关的所知信息。

**性骚扰行为:**违反他人意愿,以语言、表情、动作、文字、图像、视频、语音、链接或其他任何形式的信息使他人产生与性有联想的不适感行为,无论行为或信息的发出者是否具有骚扰或其他任何不当目的或意图。

**个人信息:**是以电子或者其他方式记录的与已识别或者可识别的自然人有关的各种信息,不包括匿名化处理后的信息。

**利益冲突:**指员工在履职过程中,其职务所代表的公司利益、客户利益或投资者利益与其自身的个人利益之间存在冲突,可能损害公司、客户和投资者利益的情形。

**Corruption:** An act of offering, giving, receiving or soliciting, directly or indirectly, valuables that may improperly influence the other party.

**Fraud:** Any act or omission, including misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party in order to obtain a financial or other advantage or to avoid an obligation.

**Collusion:** An arrangement between two or more parties to improperly influence another party with the intent to achieve an improper purpose.

**Coercion:** An act that directly or indirectly impairs or injures, threatens to impair or injure any of the other parties or their property, and that improperly affects the other parties.

**Obstruction:** An act that intentionally destroys, falsifies, or conceals evidentiary material necessary for an investigation or provides false material to investigators with the intent to seriously impede an investigation into allegations of corruption, fraud, coercion, or conspiracy; threatens, harasses, or coerces any party to refrain from participating in an investigation or disclosing information known to the party in connection with an investigation.

**Sexual Harassment:** An act that causes another person discomfort by words, facial expressions, gestures, text, images, video, voice, links or any other form of information

that creates sexually explicit associations against that person's will, regardless of whether the conduct or information is sent with harassment or any other improper purpose or intent.

**Personal Data:** all kinds of electronically recorded information that is in relation to an identified or identifiable natural person, excluding anonymized information.

**Conflict of interest:** refers to a situation where an employee, in the course of performing his/her duties, has a conflict between the interests of the company, clients or investors and his/her own personal interests, which may harm the interests of the company, clients and investors.

## 第四章 企业文化与合规文化的融合 **Integration of Corporate**

### **Culture and Compliance Culture**

企业文化是企业运行的指南针，合规文化建立在企业文化基础上，同时又为企业文化的养成提供保障。

#### 4.1 企业使命：提供绿色能源，构建智能世界

为实现环保目标，减少碳排放，我们以提供绿色能源为使命，在研产销每一个环节满足国内、国际、行业标准以及客户要求。

#### 4.2 企业愿景：专注科技创新，引领能源变革为人类美好生活续航

我们专注技术领域的学习和创新，保证足够的研发投入和人才培养，保持行业领先地位，追踪能源领域法律法规政策变化，为能源变革贡献力量。

#### 4.3 企业精神：创新 创业 协作 共赢

不论是内部交流还是与外部合作伙伴的往来，我们坚持相互尊重、诚实谦逊、平等协作的原则。在内遵守规章制度流程，营造无障碍沟通、团结奋进的工作氛围，对外尊重对手、重视客户，持续不断地提升产品安全和质量，维护公平竞争、杜绝腐败的市场环境。

Corporate culture is the compass of business running on which the compliance culture is based, while the compliance culture guarantees the development of corporate culture at the meantime.

#### 4.1 Corporate Mission: Provide Green Energy, Build an Intelligent World

In order to realize the goal of environmental protection and reduce carbon emissions, we take providing green energy as our mission, and meet the domestic,

international, industry standards and customer requirements in every aspect of research, production and marketing.

4.2 Corporate Vision: Focusing on technological innovation, leading the energy revolution and contributing to a better life for mankind.

We focus on learning and innovation in the field of technology, ensure sufficient investment in R&D and personnel training, maintain the leading position in the industry, track changes in laws, regulations and policies in the field of energy, and contribute to the energy revolution.

4.3 Corporate Spirit: Innovation, Entrepreneurship, Collaboration and Win-Win

We adhere to the principles of mutual respect, honesty and humility, and equal collaboration in both internal and external communications. Internally, we abide by the rules and regulations and create a working atmosphere of barrier-free and unity; externally, we respect our rivals and value our clients; we continuously improve the safety and quality of our products and endeavor to maintain a fair and corruption-free market environment.

## 第五章 合规行为准则 Code of Compliance

孚守合规，能行万里。只有从日常点滴做起，恪守合规准线，才能行稳致远。员工在日常经营行为中应力争达到最高道德标准，并满足坚持诚信合规、维护公平竞争、防止腐败贿赂、禁止内幕交易、回避利益冲突、保守商业秘密、管控产品与质量安全等方面的合规要求。严禁任何腐败行为、欺诈行为、串通行为、胁迫行为、性骚扰行为或妨碍行为的发生。

### 5.1 坚持诚信合规

5.1.1 全体员工应坚持诚信合规工作，认真履行自身职责，努力维护企业社会形象及良好声誉；

5.1.2 以尊重及谦逊的态度对待所有同事及访客；尊重个体在地域、宗教、文化、民族、教育、容貌、性别、性取向等方面的差异；不得使用辱骂、污蔑、歧视、胁迫性的语言；不得有打架斗殴、欺凌等暴力行为；不得实施性骚扰行为。

5.1.3 以信任和协作的态度，与同事、下属及领导沟通工作问题，相互配合完成工作任务；

5.1.4 以诚实、公平的态度对待所有业务伙伴，确保向业务伙伴沟通或介绍的信息真实准确，不得通过误导现有或潜在业务伙伴获取业务；

5.1.5 不得实施任何可能导致企业陷入违法嫌疑或被明令禁止的不合规行为；

5.1.6 不得非法获取公司财物，不得滥用职权；

5.1.7 不得伪造、变造且不得使用伪造、变造的工作记录、证件、印章、投标文件或其他材料。

5.1.8 工作中若需处理个人信息，需遵守《中华人民共和国个人信息保护法》的规定，满足五项基本原则：合法、正当、诚信原则；最小程度原则；公开透明原则；完整性和准确性原则；安全保障原则。

## 5.2 维护公平竞争

5.2.1 遵守并维护竞争法和反垄断法等维护市场公平竞争的法律法规及合规要求。

5.2.2 不得与竞争对手串通或共同参与具有不正当目的或影响的行为，包括串标、形成价格联盟、破坏投标程序、分割市场、限制产品生产产量等。

5.2.3 不得违反竞争法或反垄断法，与竞争对手交换敏感信息。

5.2.4 不得违反反洗钱和反恐怖融资的法律和法规，不得与资金来源不合法的客户开展业务。

5.2.5 遵守所有关于商品和技术跨境转移的出口管制、经济制裁规定和海关法规。

5.2.6 遵守国际上对支持恐怖主义的国家和其他被经济制裁国家的政策和规定。

## 5.3 防止腐败贿赂

5.3.1 严禁员工向任何人提供可能被认定为贿赂的任何物品。员工应充分认识到公司在商业上的成功应基于市场竞争力、业绩以及产品质量、服务质量和技术质量；

5.3.2 不得直接或通过他人为获取不正当利益提供或许诺金钱、服务、礼物或其他有价值的物品等任何形式的贿赂，包括不得支付融通费、不得通过雇佣提供贿赂、不得以“捐赠赞助”的形式提供贿等；

5.3.3 不得直接或通过他人利用职务上的便利或利用本人职权或地位形成的便利条件，为他人谋取不正当利益，包括但不限于在与第三方合作的过程中违反



股份公司《反舞弊管理制度》的规定索取或者收受金钱、服务、礼物或其他有价值的物品；

5.3.4 在与国内外政府或其附属机构开展业务时，特别是在寻求政府批准、特许、准入或相关审批的情况下，员工不得直接或通过他人提供或许诺金钱、服务、礼物或其他有价值的物品等任何形式的贿赂；

5.3.5 在尊重工作所在地宗教习惯、社会习俗及文化的前提下，员工可以在商务活动中交换象征性的礼物、非现金礼节性纪念品或提供友好的接待，但不得出于获取不正当利益的目的，且不得违反股份公司《反舞弊管理制度》的规定。

#### 5.4 禁止内幕交易

5.4.1 任何员工知悉股份公司内幕信息后，对内幕信息负有保密责任，不得以任何方式向任何单位或个人泄露尚未公开披露的信息；

5.4.2 股份公司禁止任何知悉证券交易内幕信息的员工利用内幕信息从事或建议他人从事证券交易活动；

5.4.3 任何员工违反股份公司内幕信息保密管理制度，擅自泄露内幕信息或由于失职导致内幕信息泄露，给股份公司造成严重影响或损失时，将受到纪律处分、经济处罚并承担法律责任。

#### 5.5 回避利益冲突

5.5.1 员工不得利用公司的财产、信息或在公司所担任的职务，获取本应由公司获得的商业机会，应先将该机会提供给公司；

5.5.2 员工不得直接、或者通过亲友间接地，在任何有损其在公司履职，或者需要其在工作时间内投入一定事件的商业实体中享有任何财务利益（所有权或其他）；

5.5.3 员工原则上不得在与公司存在竞争的私有公司或存在重要业务关系的公司中持有任何所有者权益（超过 1%时应及时向审计报告其持股情况）或担任董事会、委员会成员或顾问，经公司董事会批准除外；

5.5.4 员工不得从公司的重要客户、供应商或竞争对手处获得贷款或个人债务担保，或与上述主体进行任何其他的个人财务交易；

5.5.5 员工的亲友与公司发生业务往来前需向审计进行申报，就是否进行或继续业务关系的标准，相关的条款和条件，在同等条件下，不应低于非亲友寻求与公司发生业务往来所适用的标准。

5.5.6 员工不得擅自安排亲属担任与本人有直接上下级关系的职务，擅自安排亲属在公司企管人事、财务、供应、销售、工程和审计等部门工作。

5.5.7 公司雇佣前任或现任政府雇员应当遵守相关法律法规和公司规章制度。

## 5.6 保守商业秘密

商业秘密保护范围主要包括公司的战略规划、管理方法、商业模式、改制上市、并购重组、产权交易、财务信息、投融资决策、产购销策略、资源储备、供应商客户信息、招投标事项等经营信息以及设计、程序、产品配方、制作工艺、制作方法、技术诀窍等技术信息。

5.6.1 不得在未经内部沟通或向上级领导请示前，擅自对外发布、在公开场合讨论、向未经授权的人或机构披露或无正当授权情况下使用公司或相关第三方的商业保密信息和专属信息。

5.6.2 保密信息包括但不限于成果、预测及其他财务数据；人力资源和个人信息；并购、剥离、新产品和订单的相关信息。专属信息包括但不限于公司制定或实现的商业战略、技术、产品改进、发明、信息系统、商业秘密以及专有技术，以及任何保密协议涵盖的事项。

5.6.3 负责管理、使用、传递保密信息和专属信息（包括有关客户和供应商的信息）的员工不得在公司内部或向外部第三方不当披露和滥用相关数据。

5.6.4 加强知识产权保护，对未经授权而使用公司知识产权的人员予以责任追究；尊重有效的知识产权并避免未经授权使用属于他人或组织的知识产权。

5.6.5 加强数据保护和数据安全，确保公司的信息、网络和产品安全以及员工个人信息安全。在处理、共享和保留机密信息方面事先获得利益相关者的许可。

5.6.6 不得利用公司的商业机会、财产、信息或其他资源为自己或他人谋取利益。

## 5.7 产品管控与质量安全

“求真务实，知行合一”是保证产品合规的行为准则。

5.7.1 公司在提升研发生产技术的同时响应国家号召节能减排，减少污染物排放，为保护环境贡献力量。

5.7.2 提高合规意识，遵从企业合规文化及相关工作流程指引，确保产品的全生命周期均符合相关法律法规监管及客户要求，为增强社会各界对公司产品的信心而不断努力。



5.7.3 遵守法律法规、操作指南和规章制度保证产品的安全和质量。

5.7.4 持续追踪学习本行业动态，确保内部知识库处于最新状态。

5.7.5 善于思考工作中每个行为可能带来的影响，在职责范围内揭示潜在风险。

5.7.6 跨职能沟通，多角度分析，采用最佳防治措施并做好记录。

Compliance makes long-term success. Only by starting from the daily routine and abiding by the compliance requirements can we move forward. Employees should strive to meet the highest ethical standards in their daily work and meet the compliance requirements of adhering to integrity and compliance, maintaining fair competition, preventing corruption and bribery, prohibiting insider trading, avoiding conflicts of interest, keeping trade secrets, and controlling product and quality safety. Any corruption, fraud, collusion, coercion, sexual harassment or obstruction is strictly prohibited.

#### 5.1 Adhere to integrity and compliance

5.1.1 All employees shall work in good faith and compliance, fulfill their duties conscientiously, and strive to maintain the social image and good reputation of the Company;

5.1.2 Treat all colleagues and visitors with respect and humility; respect individual differences in terms of geography, religion, culture, ethnicity, education, appearance, gender, sexual orientation, etc.; refrain from using abusive, slanderous, discriminatory and coercive language; refrain from violent behavior such as fighting, bullying, etc.; and refrain from committing acts of sexual harassment.

5.1.3 Communicate with coworkers, subordinates, and leaders in a trusting and collaborative manner, and cooperate with each other to complete work tasks;

5.1.4 Treat all business partners with honesty and fairness, ensure that the information communicated or presented to business partners is true and accurate, and shall not obtain business by misleading existing or potential business partners;

5.1.5 Not to commit any non-compliant behavior that may lead to the business being suspected of violating the law or is expressly prohibited;

5.1.6 Not to unlawfully obtain any company property or abuse his/her power;

5.1.7 Shall not forge or alter and shall not use forged or altered work records, documents, seals, tender documents or other materials.

5.1.8 Shall comply with the provisions of the Law of the People's Republic of China on the Protection of Personal Data when handling personal data and satisfy the five basic principles: lawfulness, legitimacy and good faith; minimization; openness and transparency; completeness and accuracy; safety and security.

## 5.2 Maintaining fair competition

5.2.1 Comply with laws, regulations and compliance requirements for maintaining fair competition in the market, such as the Competition Law and the Anti-Monopoly Law.

5.2.2 Not to collude or jointly participate with competitors in acts with improper purposes or influence, including bid-rigging, forming price alliances, sabotaging bidding procedures, dividing the market, and restricting the production output of products.

5.2.3 Not to exchange confidential information with competitors in violation of competition or antitrust laws.

5.2.4 Not to violate anti-money laundering and anti-terrorist financing laws and regulations, and not to conduct business with clients with illegal sources of funds.

5.2.5 Comply with all export controls, economic sanction provisions, and customs regulations regarding the cross-border transfer of goods and technology.

5.2.6 Comply with international policies and regulations on countries that support terrorism and other countries subject to economic sanctions.

## 5.3 Prevention of corruption and bribery

5.3.1 Employees are strictly prohibited from offering anything to anyone that could be construed as a bribe. Employees should be fully aware that the Company's commercial success should be based on market competitiveness, performance, and the quality of its products, services and technology;

5.3.2 Bribery in any form, including the offering or promising of money, services, gifts or other items of value, either directly or through another person, in order to obtain an improper advantage, including the payment of facilitation fees, the provision of a

bribe through employment, or the provision of a bribe in the form of a “sponsorship donation”;

5.3.3 Not to use, directly or through others, the power of one's position or the power created by one's authority or position to seek improper benefits for others, including but not limited to soliciting or accepting money, services, gifts or other items of value in violation of the provisions of the Anti-fraud Management System of the Company in the course of cooperation with third parties;

5.3.4 When conducting business with domestic or foreign governments or their affiliates, especially when seeking governmental approvals, licenses, access or related approvals, employees shall not offer or promise, directly or through others, any form of bribery such as money, services, gifts or other items of value;

5.3.5 Subject to respecting the religious customs, social practices and culture of the place of work, employees may exchange symbolic gifts, non-cash courtesy tokens or offer friendly hospitality in the course of their business activities, provided that this is not done for the purpose of obtaining an undue advantage and that it does not contravene the provisions of the Company's Anti-fraud Management System.

#### 5.4 Prohibition of insider trading

5.4.1 Any employee with knowledge of the insider information of the Company shall be responsible for keeping the insider information confidential and shall not disclose prior to a lawful public disclosure;

5.4.2 The Company prohibits any employee with knowledge of insider information on securities trading from utilizing the insider information to engage in, or suggesting that others engage in, securities trading activities;

5.4.3 Any employee who violates the confidentiality management system of the Company for insider information, discloses insider information without authorization or causes the disclosure of insider information due to dereliction, which causes serious impacts or losses to Company, shall be subject to disciplinary actions, financial penalties and bear legal responsibilities.

#### 5.5 Avoidance of conflict of interest

5.5.1 Employees shall not utilize the Company's property, information or position

held in the Company to obtain business opportunities that should have been obtained by the Company;

5.5.2 Employees shall not have any financial interest (ownership or otherwise), directly, or indirectly through family or friends, in any business entity that impairs their performance of their duties with the Company or requires their input in certain events during working hours;

5.5.3 Employees shall not, hold any ownership interest (in excess of 1% they shall promptly report to the Audit about their shareholdings) or serve as a member of a board of directors, a committee, or as an advisor in a privately owned company that competes with the Company, or in a company with which there is a significant business relationship, unless approved by the Company's Board of Directors;

5.5.4 Employees shall not obtain loans or personal debt guarantees from customers, suppliers or competitors of the Company, or engage in any other personal financial transactions with such subjects;

5.5.5 Friends and relatives of employees are required to make a declaration to Audit prior to engaging in business with the Company, and the relevant terms and conditions with respect to the criteria for whether to enter into or continue a business relationship shall not be less favorable than those applicable to non-friends and relatives seeking to engage in business dealings with the Company;

5.5.6 Employees shall not make unauthorized arrangements for their relatives to hold positions with which they have a direct superior-subordinate relationship, or make unauthorized arrangements for their relatives to work in the Company's corporate management, human resource, finance, supply, sales, engineering or auditing department;

5.5.7 Employment of former or current government employees by the Company shall be in compliance with relevant laws and regulations and the Company's rules and regulations.

#### 5.6 Protection of trade secrets

The scope of protection of trade secrets mainly includes the company's strategic planning, management methods, business models, restructuring and listing,

reorganization, equity transactions, financial information, investment decisions, production, purchase and marketing strategies, resource reserves, supplier and customer information, bidding matters and other operational information, as well as design, procedures, product formulas, production processes, production methods, know-how and other technical information.

5.6.1 Employees shall not release, discuss in public, disclose to unauthorized persons or institutions, or use commercial Confidential Information and Proprietary Information of the Company or relevant third parties without proper authorization;

5.6.2 Confidential information includes, but is not limited to, achievements, forecasts and other financial data; human resources and personal information; and information related to mergers and acquisitions, divestitures, new products and orders. Proprietary information includes, but is not limited to, business strategies, technologies, product improvements, inventions, information systems, trade secrets, and know-how developed or realized by the Company, as well as any other information covered by any confidentiality agreements.

5.6.3 Employees responsible for the management, use, and transmission of Confidential Information and Proprietary Information (including information about customers and suppliers) shall not improperly disclose and misuse relevant data within the Company or to any third parties.

5.6.4 Strengthen the protection of intellectual property rights and hold accountable those who use the Company's intellectual property rights without authorization; respect valid intellectual property rights and avoid unauthorized use of intellectual property rights belonging to other entities.

5.6.5 Enhance data protection and data security to protect the company's information, network and products, as well as employees' personal information. Prior consent is needed before processing, sharing and retaining any such data.

5.6.6 Not to utilize the company's business opportunities, property, information or other resources for the benefit of oneself or any third parties.

#### 5.7 Product Control and Quality and Safety

*Knowing-doing* is the code of conduct to ensure product compliance.

5.7.1 The Company shall respond to the national call for energy saving and emission reduction and reduces pollutant emissions while improving R&D and production technology, contributing to the protection of the environment;

5.7.2 Enhance the awareness of compliance, comply with the corporate compliance culture and related workflow guidelines to ensure that the entire life cycle of the product meets the relevant laws, regulations, regulatory and customer requirements; make continuous efforts to help enhance clients' confidence in our products;

5.7.3 Comply with laws, regulations, operation guidelines and rules to ensure product safety and quality.

5.7.4 Continuously track and learn the industry trends to keep the internal knowledge base updated;

5.7.5 Discover and reveal any potential risks in daily work.

5.7.6 Employees shall communicate cross-functionally, analyze from multiple perspectives, take precautions and keep records.

## **第六章 管理层和员工的合规责任 Compliance Responsibilities of Management and Employees**

在执行本准则的同时，公司管理层及员工还应负有以下合规责任：

6.1 公司管理层必须积极推动本准则的实施，并通过行动表明其遵守本准则的承诺；

6.2 公司管理层应带头遵守本准则的合规要求并配合合规管理人员进行合规性评价等合规管理活动；

6.3 公司管理层应向员工强调在开展任何生产经营活动时遵守道德标准和合规要求的重要性和必要性；

6.4 公司员工应遵守其岗位职责和工作活动所涉及的法律法规及合规要求，并执行本准则；

6.5 公司员工有义务举报任何已知或可能违反本准则的行为。公司管理层应积极发现和应对任何违反本准则的行为，并保护举报不合规行为的员工；



6.6 公司全体员工均应签署员工合规承诺书并遵照执行。

In performing this Code, the Company's management and employees shall have the following compliance responsibilities:

6.1 The Company's management must actively promote the implementation of this Code and demonstrate its commitment to comply with this Code through its actions;

6.2 The Company's management shall take the lead in complying with the compliance requirements and cooperate with compliance management personnel in compliance management activities such as compliance evaluation;

6.3 The Company's management shall emphasize to its employees the importance and necessity of complying with ethical standards and compliance requirements in carrying out any production and business activities;

6.4 The Company's employees shall comply with the laws, regulations and compliance requirements involved in their job duties and work activities, and implement this Code;

6.5 The Company's Employees are obliged to report any known or potential violation of this Code. The Company's management shall actively detect and respond to any violation of this Code and protect employees who report non-compliance;

6.6 All employees of the Company shall sign the Employee Compliance Pledge and act accordingly.

## **第七章 咨询、举报与违规处理 Counseling, Reporting and**

### **Violations**

7.1 任何员工面临下列情形时，应及时主动地向合规主管部门咨询或举报：

7.1.1 对某种行为的合规性存在疑问；

7.1.2 特定情形下难以判断如何遵守本公司合规要求；

7.1.3 业务合作伙伴、同事的行为违反相关法律法规及公司合规要求；

7.1.4 公司或个人受到外部的合规调查、质询或举报；

7.1.5 其他任何与合规相关的问题或情况。

7.2 任何部门、员工或业务合作伙伴，若知晓任何违反或疑似违反股份公司合规政策、相关法律法规和其他要求的情况，无论情节是否重大，可实名或匿名向合规主管部门或通过以下渠道进行咨询或举报：

咨询举报电话：0797-7329850

咨询举报邮箱：[compliance@farasisenergy.com.cn](mailto:compliance@farasisenergy.com.cn)。

7.3 举报人身份、举报内容及后续调查人、证人、调查情况严格保密。公司和个人不得以任何借口和手段阻止、压制举报人进行举报，也不得打击报复举报人、调查人、证人及其亲属。对于举报不合规行为或积极提出合规建议，为公司避免重大损失的员工，应给予奖励。

7.4 公司员工违反本准则的，根据股份公司相关规定给予警告直至解除劳动合同的处分。

7.1 Any employee who is faced with any of the following situations should promptly and proactively consult with or report to the Compliance Department:

7.1.1 Doubts about the compliance of a certain behavior;

7.1.2 Difficulty in judging how to comply with the Company's compliance requirements under specific circumstances;

7.1.3 The behavior of business partners and colleagues violates relevant laws and regulations and the Company's compliance requirements;

7.1.4 The Company or individuals are subject to external compliance investigations, inquiries or reports;

7.1.5 Any other compliance-related issues or situations.

7.2 Any department, employee or business partner who is aware of any violation or suspected violation of the compliance policy, relevant laws and regulations and other requirements, regardless of whether the circumstances are material or not, may make inquiries or reports to the compliance department in real name or anonymously or through the following channels:

Consultation and Reporting Tel: 0797-7329850

Consultation and Reporting Email: [compliance@farasisenergy.com.cn](mailto:compliance@farasisenergy.com.cn).

7.3 The identity of the whistleblower, the content of the report and subsequent investigators, witnesses, and investigations are strictly confidential. The Company or any individuals shall not use any excuse and means to prevent, suppress the whistleblower to report, and shall not retaliate against whistleblowers, investigators, witnesses and their relatives. Employees who report non-compliance behavior or actively put forward compliance suggestions to avoid significant losses for the Company shall be rewarded.

7.4 Any employee of the Company who violates this Code shall be given a warning up to the termination of the labor contract in accordance with the relevant provisions of the Company.

本准则自印发之日起施行。

This Code shall enter into force on the date of issuance.

孚能科技（赣州）股份有限公司

2024年9月24日