

Risen Energy Co., Ltd.
东方日升新能源股份有限公司**Code of Business Conduct and Ethics**
商业行为和道德准则**Introduction**
引言

As a first-class photovoltaic company, Risen Energy Co, Ltd., a company duly registered in P. R. China, along with its subsidiaries and branches (jointly hereinafter referred to as “Group”) are committed to providing the qualified and excellent products to the customer around the world and following the high standards of ethics and integrity in its business conduct. The employees of the Group are expected to always act lawfully, ethically, and in the best interests of the Group in performing their duties, through which, the reputation of the Group can be maintained. The Code of Business Conduct and Ethics (hereinafter referred to as “Code”) sets out the basic principles that will guide the employees of the Group to avoid the wrongdoings and even the appearance of the improper behaviors. In addition, the Group also expects its suppliers and partners to comply with the general principles of this Code, as such, the employees of the Group are encouraged to make the suppliers and partners aware of and abide by these principles.

作为全球领先的光伏企业，东方日升新能源股份有限公司（系一家依据中华人民共和国法律注册成立的公司）及其子公司和分支机构（以下统称为“集团”）致力于为全球客户提供优质卓越的产品，并在商业活动中恪守高标准的道德与诚信准则。集团要求员工在履职过程中严格遵守法律法规与道德规范，始终以集团利益为重，以维护集团声誉。本《商业行为和道德准则》（以下简称为“准则”）明确了基本原则，用以指导员工避免违规行为，并防止任何可能被视为不当的行为。此外，集团亦要求供应商与合作伙伴遵循本准则的一般原则，并鼓励集团员工推动其知悉与遵守该等要求。

It is impossible to list every issue concerned, and therefore this Code just represents the minimum baseline of acceptable business conduct and ethics of the Group. Certain positions and departments at the Group, or those having transactions with governments when they perform their duties, may be required to adhere to even stricter policies. The Group also has a number of other policies for specific business and administrative situations, such as the proper handling of travel and other expenses, which employees should also familiarize themselves with and follow. This Code supersedes all other codes of conduct, policies, procedures, instructions, practices, rules or any written or verbal representations (if any) to the extent that they are inconsistent with this Code. However, nothing in this Code otherwise alters the at-will employment policy of the Group.

本准则无法穷尽所有相关问题，故仅代表集团对商业行为与道德的最低要求。集团的特定职位、部门或需与政府发生业务往来的员工，须遵守更为严格的规定。集团还针对特定业务及管理场景制定了专项政策（如差旅费用合规管理等），员工亦须知悉并严格执行。凡其他行为准则、政策、程序、指示、惯例、规则或任何书面/口头表述与本准则冲突者，均以本准则规定为准。但本准则不影响集团现行的自由雇佣原则。

All employees are expected to have accurate, clear and full understanding of this Code and strictly abide by it, thus regular and irregular training initiatives will be carried out to ensure that this Code is properly understood by all the Group employees. Anyone who violates this Code or any other applicable standards of his or her position will be subject to disciplinary action, which, depending on the nature of the violation and the history of these persons, may range from a warning or rebuke to and including termination of employment and, in some cases, civil legal action or referral for regulatory or criminal prosecution. This Code is subject to periodically modification to ensure its adequacy and effective implementation.

全体员工须全面、准确地理解并严格遵守本准则。集团将通过定期与不定期培训，确保员工准确理解与落实准则要求。违反本准则或岗位相关标准者，将视违规性质及历史记录予以纪律处分，包括但不限于警

告、记过、解除劳动合同；情节严重者，集团可依法提起民事诉讼或移送司法机关处理。本准则将定期修订，以确保其适用性与执行效力。

Compliance with Laws, Rules and Regulations

遵守法律、规则和法规

Obedying the law, rules and regulations both in letter and in spirit, is the foundation on which this Code are built. The employees have the obligation to comply with the applicable laws, rules and regulations of the cities, provinces/states, regions and countries where the Group conducts business, which include but not limited to laws concerning commercial bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, insider trading, offering or receiving gratuities, employment harassment, environmental protection, occupational health and safety, false or misleading financial information, misuse of corporate assets or foreign currency exchange activities. Employees are expected to understand and comply with all laws, rules and regulations that apply to their position within the Group. However, being aware of the details of these laws, rules and regulations is highly demanding, employees should timely seek advice from supervisors, managers or the department in charge of the compliance assurance.

守法遵规（包括法律条文与立法精神）是本准则的根基所在。员工必须严格遵守集团业务所涉各城市、省/州、地区及国家的相关法律法规，包括但不限于以下领域：商业贿赂与回扣、著作权、商标权与商业秘密、信息隐私保护、内幕交易、不当利益输送、职场骚扰、环境保护、职业健康安全、虚假财务信息、公司资产滥用及外汇交易活动等。员工须充分理解并恪守与其岗位职责相关的所有法律规定。鉴于全面掌握法律细则的复杂性，员工应及时向直属主管、管理层或合规管理部门咨询求证。

Corporate Opportunities

商业机会

The employees are not allowed to gain any improper personal gains and benefits or compete with the Group in any direct and indirect way by taking the advantages of the opportunity for the Group that are discovered as the result of their position with the Group or through their use of property or information of the Group. Even opportunities that are acquired privately by those persons may be questionable if they are related to Group's existing or proposed lines of business. Instead, the Group expects its employees to advance the Group's legitimate interests.

员工不得利用职务便利获取的集团商业机会、财产或信息，以直接或间接方式谋取不正当个人利益，或与集团进行竞争。即便系员工私下获取的商业机会，若与集团现有或拟开展业务存在关联，亦应视为违规行为。集团要求员工必须优先维护集团的正当商业权益。

Impartiality, Integrity and Conflicts of Interest

公正、诚信和利益冲突

In decisions that influence relations with its stakeholders (customer relations, shareholder relations, management of personnel or work organization, management of suppliers and partners, relations with the surrounding community and the institutions that represent it), Group avoids all forms of discrimination based on gender, age, ability, nationality, disability, sexual orientation, ethnicity, religious beliefs, political opinions and any other form of diversity. With regards to their professional activities, Employees must act diligently in compliance with the law, the Code of Ethics, and the Group's internal policies and regulations. The pursuit of Group's interests cannot justify dishonest conduct under any circumstances.

在与利益相关方（包括客户、股东、员工、供应商及合作伙伴、社区及代表机构等）相关的决策中，集团严禁基于性别、年龄、能力、国籍、残障状况、性取向、种族、宗教信仰、政治立场等任何形式的歧视。员工开展职业活动时，须恪守法律法规、道德准则及集团内部规章制度。任何情况下均不得以集团利益为由实施不诚信行为。

A “conflict of interest” occurs when the personal interests of employees may interfere in any way with their performance and impair the best interest of the Group as the result of the influence on their objective judgment. Factors that may be considered in evaluating a potential conflict of interest are, among others:

当员工个人利益可能影响其客观判断，进而干扰履职表现或损害集团利益时，即构成“利益冲突”。评

估潜在利益冲突时应考量以下因素（包括但不限于）：

- whether it may interfere with the employees' job performance, responsibilities or moral or whether it may interfere with the job performance, responsibilities or moral of others within the Group;
是否可能干扰员工的工作表现、职责或道德，或是否可能干扰集团内其他人员的工作表现、职责或道德；
- any potential adverse or beneficial influence on Group's business;
对集团业务的任何潜在不利或有利影响；
- any potential adverse or beneficial influence on Group's relationships with its customers or suppliers or other service providers;
对集团与其客户、供应商或其他服务提供商关系的任何潜在不利或有利影响；
- whether employees have access to confidential information;
员工是否能接触到机密信息；
- the extent to which it would result in financial or other benefit (direct or indirect) to one of Group's customers, suppliers or other service providers
在多大程度上会为集团的客户、供应商或其他服务提供商带来财务或其他利益（直接或间接）
- whether it would enhance a competitor's position; and
是否会增强竞争对手的地位；以及
- the extent to which it would be regarded as improper to an outside observer.
在外部观察者看来在多大程度上会被视为不当。
- although it is impossible to include every possible situation where a conflict of interest could arise, the following are examples of situations that may, depending on the facts and circumstances, involve conflicts of interests:
虽然不可能列举所有可能出现利益冲突的情况，但以下是可能涉及利益冲突的示例情况（具体取决于实际情况和环境）：
 - taking part-time job without permission;
未经许可从事兼职工作；
 - whether directly or indirectly owning a significant financial interest in any entity that does business, seeks to do business or competes with the Group;
直接或间接拥有与集团有业务往来、寻求与集团开展业务或与集团竞争的任何实体的重大经济利益；
 - soliciting or accepting gifts, favors, loans or preferential treatment from any person or entity that does business or seeks to do business with the Group.
向与集团有业务往来或寻求与集团开展业务的任何个人或实体索取或接受礼物、好处、贷款或优惠待遇；
 - asking contributions to any charity or for any political candidate from any person or entity that does business or seeks to do business with the Group.
向任何与集团有业务往来或寻求与集团开展业务的个人或实体请求为任何慈善机构或政治候选人捐款；
 - taking personal advantages of corporate opportunities.
个人利用公司商业机会；
 - being employed by (including consulting for) or providing service on the board of directors of a competitor, customer or supplier or other service provider;
受雇于（包括担任顾问）或在竞争对手、客户或供应商或其他服务提供商的董事会任职；
 - taking the advantages of the position in the Group to conduct business with the family member of employees or an entity where employees have a significant financial interest and exercising supervisory or other authority on behalf of the Group over a co-worker who is also a family member.
利用在集团的职位与员工的家庭成员或员工拥有重大经济利益的实体开展业务，以及代表集团对同为家庭成员的同事行使监督或其他权力；
 - a romantic or other personal relationship between co-workers when one person is able to influence employment decisions or other benefits affecting the other.
同事之间的恋爱或其他私人关系，其中一方能够影响另一方的雇佣决定或其他利益。

Conflicts of interest are strictly prohibited except under guidelines approved by the Board of Directors. Conflicts of interest may not always be clear, therefore if any employee has a doubt or believes that he or she know an actual or suspected conflict, please report it to a supervisor, manager or the Compliance and Internal Control Department.

利益冲突行为严格禁止，经董事会特别批准的除外。鉴于利益冲突情形可能存在隐蔽性，员工如发现实际或潜在冲突，应立即向直属上级、管理层或内控部门报备。

Insider Trading

内幕交易

The employees of the Group are not permitted to use or share non-public information for stock trading or for any other purpose except to conduct the Group's business if they possess or have the access to that information. All non-public information about the Group or about companies with which the Group does business is regarded as confidential information, including but not limited to any information that has not yet been made available or disclosed to the public and that might be of significance to an investor. Using non-public information for stock trading or other personal financial benefit or to tip others who might do so is illegal. If any employee has any questions, please consult the Securities/Compliance and Internal Control Departments before engaging in any related activities.

集团严禁员工利用职务获取或接触的非公开信息进行股票交易或谋取私利（仅限用于集团业务开展）。所有涉及集团及业务伙伴的未公开信息（包括但不限于可能影响投资者决策的任何未公开信息）均属机密信息；任何利用内幕信息进行证券交易、获取不当利益或泄露信息的行为均属违法。如有任何疑问或需开展可能涉及内幕信息的业务活动，必须事先向证券部或内控部门咨询并取得明确指导。

Competition and Fair Dealing

竞争和公平交易

The Group pursues business success through the superior quality of products and good commercial conducts, as the consequence, it strives to compete fairly and honestly. Accordingly, the employees of the Group should respect the rights of, and should deal fairly with, the Group's customers, suppliers, competitors and should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or any material misrepresentation. For example, an employee should not:

集团通过提供卓越的产品品质和恪守规范的商业道德以取得市场成功，因此致力于公平和诚实的竞争。相应地，集团员工应尊重客户、供应商、竞争对手的权利，公平对待各方，不得通过操纵、隐瞒、滥用特权信息或任何重大失实陈述等方式获取不当优势。例如，员工不得：

- give or receive kickbacks, bribe others, or secretly give or receive commissions or any other personal benefits;
给予或收受回扣、贿赂他人，或秘密给予或收受佣金或任何其他个人利益；
- collusion with competitors on pricing and other terms;
与竞争对手串通定价和其他条款；
- provide information to benefit one vendor over others;
提供信息以使某个供应商获益而损害其他供应商；
- spread rumors about competitors, customers or suppliers that the employee knows to be false;
散布明知虚假的关于竞争对手、客户或供应商的谣言；
- intentionally misrepresent the nature of quality of the Group's products;
故意歪曲集团产品的性质或质量；
- violate fair bidding practices including bidding quiet periods;
违反公平投标规范，包括投标静默期；
- seek to advance the Group's interests by taking unfair advantage of anyone through unfair dealing practices, including engaging in unfair practices through a third party;
通过不公平的交易行为（包括通过第三方进行不公平行为）谋取不当利益以推进集团利益；
- make any formal or informal agreements with competitors which impair competition or the benefits of customers, including price fixing and allocations of customers, territories or contracts;

与竞争对手达成任何损害竞争或客户利益的正式或非正式协议，包括固定价格和分配客户、区域或合同；

- make any formal or informal agreements that establish or fix the price at which a customer may resell a product; and
达成任何确定或固定客户转售产品价格的正式或非正式协议；以及
- acquire or maintain a monopoly or attempted monopoly through anticompetitive conduct.
通过反竞争行为获取或维持垄断或试图垄断。

Confidentiality 保密

The employees of the Group must maintain the confidentiality of all information entrusted to him or her by the Group, its suppliers, its customers and other individuals or entities related to the Group's business. Confidential information includes any non-public information that if disclosed might be used by the competitors or harmful to the Group, or its customers or suppliers. Confidential information includes, among other things, the Group's customer lists and details, new product plans, new marketing platforms or strategies, computer software, trade secrets, research and development findings, manufacturing processes, or the Group's acquisition or sale prospects. 集团员工必须严格保守集团、供应商、客户及其他业务相关方委托的所有机密信息。机密信息包括任何可能被竞争对手利用或损害集团及其客户、供应商利益的非公开信息，具体涵盖：客户名单及资料、新产品计划、营销策略、计算机软件、商业秘密、研发成果、生产工艺、并购计划等。

The employees in possession of confidential information must take steps to secure such information, which include: (i) to ensure that only other employees who have the need to know the confidential information in order to do their job can access it, and (ii) to avoid discussion or disclosure of confidential information in public areas (for example, in elevators, on public transportation, and on cellular phones). The employees may only disclose confidential information when the disclosure is authorized by the Group or legally required.

持有机密信息的员工须采取以下保护措施：（1）仅限必要知情的员工接触信息；（2）禁止在电梯、公共交通、手机通讯等公共场所讨论或泄露信息。未经集团授权或法律强制要求，员工不得披露任何机密信息。

Upon termination of employment, or at such other time as the Group may request, each employee must return to the Group any medium containing confidential information, and may not retain duplicates. An employee has an ongoing obligation to preserve confidential information, even after his or her termination of employment with the Group, until such time as the Group discloses such information publicly or the information otherwise becomes available to the public through no fault of employees.

员工离职时或应集团要求，必须交还所有载有机密信息的介质且不得留存副本。即使离职后，员工仍负有保密义务，直至相关信息被集团公开或非因员工过错而成为公知信息。

Any questions or concerns regarding whether disclosure of Group information is legally mandated should be promptly referred to the Compliance and Internal Control Department.

有关信息披露法律义务的疑问，须立即咨询内控部门。

Responsibility towards the Community 社区责任

Group is aware of the direct and indirect influence that its activities can have on individual conditions, economic and social development, and general well-being of the community, as well as its social relevance in the communities in which it operates.

集团充分认识到其经营活动对社区民生、经济发展及社会福祉将产生全方位影响，以及在运营所在地的社会责任。

Group is thus committed to conducting its capital expenditure in a sustainable manner, respecting local and national communities and promoting initiatives of cultural and social value in order to further improve its reputation and

acceptance by society at large.

基于这一认知，集团承诺将可持续发展理念贯穿于资本运作全过程，在尊重当地社区权益的基础上，积极推动具有文化内涵和社会价值的公益项目，从而持续提升企业的社会公信力和公众认同度。

Group is committed to respecting the rights of local communities and to contribute to their realization, also by means of promoting free and informed consultation activities. In this regard, Group pays particular attention to the most vulnerable communities, such as tribal and indigenous peoples, including through the promotion of local development projects for the benefit of those communities.

集团郑重承诺尊重当地社区的各项权益，并通过开展公开透明的咨询活动等方式，切实保障这些权益的实现。集团尤其重视保护部落、原住民等弱势群体的合法权益，通过实施有针对性的社区发展项目，持续改善这些群体的生活状况。

More specifically, in the designing and construction of infrastructure projects, Group is committed to taking due account, within proper environmental and social impact assessments, of its environmental footprint and the respect of human rights in the areas where projects will be carried out. Where project implementation might involve relocation of local communities the objective is to minimize the impact, by engaging with them and providing fair compensation.

在基础设施项目的规划建设过程中，集团将严格执行环境与社会影响评估机制。我们承诺全面考量项目可能产生的环境影响，并充分尊重项目所在地居民的人权保障。对于可能涉及的社区搬迁安置，我们将通过充分协商和合理补偿的方式，最大程度降低对居民生活的影响。

Group is also committed to ensuring that its products and services do not compromise the safety and physical integrity of its customers, as far as reasonably foreseeable.

此外，集团始终将客户安全置于首位。我们通过严格的质量管控体系，确保所有产品和服务在正常使用条件下，不会对消费者的人身安全造成损害。

Gifts, Payments, Donations or the Exchange of Anything of Value

礼品、支付、捐赠或任何有价物的交换

Business entertainment and gifts with customers, suppliers or other business partners are welcome courtesies aiming to build good relationships and understanding among business partners unless it affects those persons' ability to make objective and fair business decisions. Gifts or entertainment are improper, even if merely offered or requested, unless they:

与客户、供应商或其他业务伙伴之间的商务招待和赠送礼品是为促进良好关系与相互理解而常见的商务礼仪，但前提是不得影响相关方做出客观公正的商业决策。任何礼品或招待行为，无论主动提供还是被动接受，只有在符合下列条件时才被视为适当：

- are consistent with customary business practices;
符合行业普遍接受的商业惯例；
- are not in cash or equivalent to cash;
不得采用现金或现金等价物形式；
- are not excessive in value;
价值不得过高；
- cannot be seen as a bribe or payoff; and
不得被视为贿赂或回扣；并且
- do not violate the law.
不得违反法律法规。

Stricter standards apply to business dealings with government personnel or candidates for political office. The employees should exercise utmost care to avoid the violation of any applicable laws, rules and regulation of any countries where the Group conducts business when they interact with government personnel or deals with government contracts. The applicable laws include *United States Foreign Corrupt Practices Act 1997*, *the United Kingdom Bribery Act 2010*, *the Australian Criminal Code Amendment (Bribery of Foreign Public Officials) Act*

1999, the Canadian Corruption of Foreign Public Officials Act 1999 and all similar applicable laws which includes the legislation implementing the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. The employees of the Group must not engage in any conduct which would violate these laws if that conduct had occurred in the jurisdiction in which these laws apply in connection with the conduct concerned.

在与政府人员或政治职务候选人的商业往来中应适用更严格的标准。当集团员工与政府人员互动或处理政府合同时，应当格外谨慎，避免违反集团开展业务所在国家的任何适用法律、规则和法规。适用法律包括 1997 年美国《反海外腐败法》、2010 年英国《反贿赂法》、1999 年澳大利亚《刑法修正案（贿赂外国公职人员）》、1999 年加拿大《反海外公职人员腐败法》、经合组织《关于打击国际商业交易中贿赂外国公职人员公约》以及所有类似的适用法律。员工不得从事任何在上述法律适用管辖范围内构成违法的行为。

Please don't hesitate to discuss with the Compliance and Internal Control Department if any employee has any questions about business entertainment and gifts.

如果任何员工对商务招待和礼品有任何疑问，请随时咨询内控部门。

Record-Keeping 记录保存

The validity, accuracy and completeness of the information supporting the entries to the Group's books of account ensure the integrity of the Group's records and public disclosure. Therefore, the Group's corporate and business records should be completed accurately and honestly. The making of false or misleading entries, whether they relate to financial results or test results, is strictly prohibited. The Group's records, including e-mail, internal memos, and formal report, serve as a basis for managing its business and are important in meeting its obligations to customers, suppliers, creditors, employees and others with whom the Group does business. As a result, it is important that the Group's books, records and accounts accurately and fairly reflect, in reasonable detail, the Group's assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities and conform both to legal requirements and the requirements of the Group. To achieve the accuracy and fairness of the Group's books, records and accounts, the Group requires that:

集团的会计记录必须真实、准确、完整地反映所有业务活动，包括资产、负债、收入、支出及其他交易细节。严禁任何虚假或误导性记录，无论涉及财务数据还是测试结果。。所有业务记录（含电子邮件、备忘录和正式报告）都应如实记载，这些记录不仅是经营管理的基础，也是履行对客户、供应商、债权人等各方义务的重要依据。集团的账簿和账目必须严格符合法律法规及内部规定，确保能够公允、全面地反映财务状况，集团要求：

- transactions should be proved by appropriate documentation;
所有交易应有适当文件证明；
- no entry be made or omitted in the Group's books and records that intentionally hides or disguises the nature of any transaction or of any of the Group's liabilities, or misclassifies any transactions as to accounts or accounting periods;
严禁在会计记录中通过虚假记载或刻意遗漏等方式隐瞒交易实质、掩饰负债状况，或进行错误的会计科目及期间分类；
- the terms of sales and other commercial transactions should be reflected accurately in the documentation for those transactions;
所有销售及其他商业交易的条款必须在相关交易文件中准确记载；
- all such documentation should be reflected accurately in the Group's books and records;
上述交易文件内容须如实反映在集团账簿及会计记录中；
- employees adhere to Group's internal controls system;
全体员工必须严格遵守集团内部管控制度；
- no cash or other assets should be maintained for any purpose in any unrecorded or "off-the books" fund;
严禁以任何形式设立或保留未入账的“账外”资金或其他资产；
- the employees are required to cooperate fully with the Group's accounting department, as well as the Group's Internal Auditor, independent public accountants, and counsel, respond to their questions with

honesty and provide them with complete and accurate information to help ensure that the Group's books and records, as well as the Group's reports filed are accurate and complete and complied with applicable laws, rules and regulations;

员工必须全面配合集团财务部门、内部审计、外部审计师及法律顾问的工作，如实回答问题并提供完整准确的信息，确保集团账簿及申报文件真实、完整，并符合相关法律法规要求；

- the employees should not knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of the Group's reports or should not knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of the Group's reports accurate in all material respects;

员工不得在集团报告中故意作出（或指使、纵容他人作出）虚假或误导性陈述，也不得故意遗漏（或指使、纵容他人遗漏）任何确保报告披露内容真实完整所必需的重要信息；

- the employee is not allowed to take or authorize any action that would cause the Group's financial records or financial disclosure fail to comply with generally accepted accounting principles or other applicable laws, rules and regulations;

禁止员工实施或授权任何可能导致集团财务记录或财务披露违反公认会计准则或其他适用法律法规的行为；

- any person who collect, provide or analyze information for or otherwise carry out the performance of preparing or verifying these reports should ensure that the Group's financial disclosure is accurate and transparent and that the Group's reports contain all of the information about the Group which is of importance to stockholders and potential investors to assess the soundness and risks of the Group's business and finances, as well as the quality and integrity of the Group's accounting and disclosures.

财务报告编制及审核人员必须确保：财务披露内容准确透明；报告完整包含股东及潜在投资者评估集团业务财务状况、财务风险以及会计信息质量与可靠性所需的所有重要信息。

Protection and Proper Use of Group's Assets 保护和正当使用集团资产

Employees should protect Group's assets and ensure their efficient use. Such protection includes properly securing, labeling and (when appropriate) disposing of confidential material. Theft, carelessness, and waste have a direct impact on the Group's financial condition. Any suspected incident of fraud or theft should be immediately reported for investigation. The obligation of employees to protect the Group's assets includes its proprietary information, examples of which include "non-public information", as well as other intellectual property such as patents, trademarks and copyrights. Unauthorized use or distribution of this information would violate the Group's policy, and could also result in civil and/or criminal penalties.

员工必须妥善保管集团资产并确保合理使用，包括对机密材料进行规范保管、标识及（适当时）销毁处理。资产盗用、管理疏忽或资源浪费都将直接影响集团财务状况。发现任何涉嫌舞弊或资产侵占的情况须立即上报核查。员工资产保护义务涵盖所有专有信息，包括但不限于未公开信息及专利、商标、著作权等知识产权。未经批准使用或披露上述信息将构成违纪行为，并可能承担相应法律责任。

To ensure the protection and proper use of the Group's assets, each employee also should:
为切实保障集团资产的妥善保管与规范使用，全体员工还须做到：

- exercise reasonable care to prevent theft, damage or misuse of the Group's property;
妥善履行资产保管责任，切实防范资产遭受盗窃、损毁或不当使用；
- safeguard all electronic programs, data, communications and written materials from inadvertent access by others; and
对电子程序、数据信息、通信记录及书面材料等采取保密措施，防止未经授权的访问；以及
- use the Group's property only for legitimate business purposes, as authorized in connection with your job responsibilities.
所有集团资产仅限用于经批准的、与本职工作相关的正当业务用途。

In order to protect the interests of the Group's network and its employees, the Group reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the

use of the Internet or the Group's intranet to the extent permitted by law. These data and information may also be subject to disclosure to law enforcement or government officials. In addition, the Group will not tolerate the use of the Group's assets to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

为保障集团网络及员工权益，集团依法有权监控公司配发电子设备中的数据和信息，包括互联网及内网使用记录，并可在法律要求时向执法部门提供相关信息。集团严禁员工利用公司资产制作、传播、存储或打印任何骚扰、威胁、淫秽或其他不当内容。

Protection of Personal Data **个人数据保护**

The Group has always recognized the importance of protecting personal data in its business activities and is fully aware of its responsibilities when processing personal data. The Group complies with applicable legal requirements for both its internal needs and for the needs of all its partners. Personal data must not be collected, used, and more generally processed, other than for one or more specified purposes, which must be legitimate and necessary for the Group's activities. As such, it is the responsibility of each employee to ensure the necessary security measures and applicable laws are implanted and respected.

集团始终重视业务活动中个人数据的保护，并充分认识到在处理个人数据时所承担的责任。集团遵守适用于内部需求和所有合作伙伴需求的法律规定。个人数据的收集、使用和处理必须限于集团业务活动所必需的一个或多个合法特定目的。每位员工均有责任确保落实必要的安全措施并遵守适用法律。

Discrimination and Harassment **反歧视和反骚扰**

The diversity of the Group's employees is a tremendous asset. The Group is firmly committed to providing equal opportunity in all aspects of employment and do not tolerate discrimination or harassment, including on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law, as well as any unwelcome physical or verbal advances. Please be aware that discrimination and harassment may take any form — verbal, physical or visual — and includes slang or joking in ways that may be offensive to others, as well as bullying. The Group insists that employees do what they can to stop others from engaging in such behavior, and prohibits retaliation against anyone who makes a good-faith complaint or participates in an investigation of such a complaint. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to the Human Resources Department.

员工多样性是集团的宝贵财富。集团坚定致力于在雇佣各个环节提供平等机会，绝不容忍任何形式的歧视或骚扰，包括基于种族、肤色、宗教、退伍军人身份、国籍、血统、怀孕状况、性别、性别认同或表达、年龄、婚姻状况、精神或身体残疾、健康状况、性取向或其他法律保护特征的歧视，以及任何不受欢迎的身体接触或言语冒犯。歧视和骚扰可能表现为言语、身体或视觉上的行为，包括使用冒犯性俚语、开不当玩笑或实施霸凌等。集团要求员工主动制止此类行为，并禁止对善意投诉或参与调查者进行报复。遭遇骚扰或歧视的员工应向直属主管或人力资源部举报。

Group avoids all forms of discrimination against its employees. During the personnel management and development phases, as well as in the selection process, the decisions taken are based on whether the required job profile corresponds to the employee's characteristics (in the case of promotion or transfer, for example) and/or on considerations of merit (for example, the awarding of incentives on the basis of the results achieved). Access to roles and positions is also determined by considering expertise and ability. Flexible forms of work organization are established to facilitate the management of periods of maternity, as well as child care in general, wherever such an approach is compatible with the overall efficiency of work.

集团避免对其员工进行任何形式的歧视。在人员管理、发展和选拔过程中，集团的所有决策均基于职位要求与员工特质的匹配度（如晋升或调岗时）和/或个人绩效（如根据工作成果给予奖励）。岗位和职位分配亦完全基于专业能力和工作表现在不影响整体工作效率的前提下，集团实行灵活的工作安排，为员工提供产假和育儿便利。

Evaluations of employees are performed in a broad manner, with the involvement of superiors, the Human Resources and Organization Function and, to the extent it proves possible, those individuals who have had dealings with the person being evaluated.

员工评估采用全方位方式，由上级主管、人力资源及组织部门共同参与，并尽可能纳入与被评估者有工作往来的相关人员意见。

Within the limits of the available information and respecting the individual's privacy, the human Resources Department seeks to prevent all forms of nepotism (for example, by excluding the possibility of direct hierarchical relationships between employees with family ties).

在信息可获取且尊重个人隐私的前提下，人力资源部门着力杜绝任何形式的裙带关系（例如避免存在亲属关系的员工之间形成直接上下级关系）。

Group undertakes to safeguard the moral integrity of employees, ensuring their right to working conditions that respect the dignity of the individual. With this in mind, Group protects workers from acts of psychological violence and opposes any attitudes or form of behavior that results in discrimination or injury of the individual or of his or her convictions or preferences (for example, in the case of insults, threats, isolation or excessive invasion of privacy, as well as professional limitations).

集团郑重承诺保障所有员工的人格尊严和工作权利。集团建立了完善的保护机制，防范职场中的心理暴力行为，包括言语侮辱、威胁恐吓、恶意孤立等。同时严格保护员工个人隐私，避免过度干涉。

Sexual harassment is not permitted, nor are any forms of behavior or speech which might hurt the feelings of individuals (for example, the exposition of images with explicit sexual references or insistent and continual sexual allusions). Employee who believes that he or she has been subjected to harassment or discrimination for motives tied to age, gender, sexual preferences, race, state of health, nationality, political opinions and religious beliefs etc. may report the fact to the company, which shall evaluate whether a violation of the Code of Ethics has occurred. Disparities that have been justified, or are subject to justification, under objective criteria are not, however, considered instances of discrimination.

严禁任何形式的性骚扰行为，包括具有性暗示的言行举止（如展示露骨的性内容图像或持续进行性暗示）。员工如因年龄、性别、性取向、种族、健康状况、国籍、政治观点或宗教信仰等原因遭受骚扰或歧视，可向公司举报。公司将依据本准则进行核查认定。但经客观标准认定为合理差异的情况，不应视为歧视行为。

The Human Resources division prepares periodic statistical analyses which allow to determine whether or not specific groups are being discriminated against. These findings are made available to top management, and the functions involved.

人力资源部定期准备统计分析，以确定是否存在对特定群体的歧视。这些发现将提供给高级管理层和相关职能部门。

Environment, Health and Safety

环境、健康和安全

Environmental Protection

环境保护

The Group shall respect the environment and work to minimize environmental impacts linked to its activities, and shall endeavor to use energy as efficiently as possible and promote the use of renewable energy. The Group is committed to minimizing and, if practicable, eliminating the use of any substance or material that may cause environmental damage, reducing waste generation and disposing of all waste through safe and responsible methods, minimizing environmental risks by employing safe technologies and operating procedures, and being prepared to respond appropriately to accidents and emergencies. In order to achieve the commitment of the Group, all the Group's employees should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures. The employees are responsible for promptly reporting any known or suspected violations of environmental laws or any events that may result in a discharge or emission of hazardous

materials. Employees whose jobs involve manufacturing or dealing with waste have a special responsibility to safeguard the environment. Such employees should be particularly alert to the storage, disposal and transportation of waste, and handling of toxic materials and emissions into the land, water or air. The main environmental protection and management measures adopted by Group include:

集团将严格遵守环境保护要求，最大限度降低生产经营活动对环境的影响。集团将持续提升能源利用效率，积极开发和使用可再生能源，最大限度减少、直至完全停止使用可能危害环境的物质。通过采用先进的安全技术和规范的操作流程，系统控制环境风险，并建立完善事故应急响应机制。全体员工必须切实履行环保责任，积极采取资源回收等节能措施减少废弃物排放，发现任何环保违规行为或污染物泄漏风险须立即上报。特别是从事生产制造和废物处理的一线员工，必须严格规范废弃物存储处置流程，切实做好有毒物质管理和“三废”排放控制。集团采取的主要环保措施包括：

- **Greenhouse Gas Management:** Suppliers should actively reduce greenhouse gas emissions and manage emissions of major gases such as carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆).
温室气体管理：供应商应积极减少温室气体排放，管控二氧化碳（CO₂）、甲烷（CH₄）、一氧化二氮（N₂O）、氢氟碳化物（HFCs）、全氟化合物（PFCs）、六氟化硫（SF₆）等主要温室气体的排放。
- **Energy Management:** Promote energy conservation and emission reduction, give priority to the use of renewable energy such as hydropower, wind energy, solar energy, geothermal energy, and bioenergy, and improve energy use efficiency.
能源管理：推动节能减排，优先使用水电、风能、太阳能、地热及生物能等可再生能源，提高能源使用效率。
- **Pollution Management:** Prevent pollution, reasonably manage air, water and soil pollution, and strictly implement treatment and discharge standards for waste (including solid, hazardous and non-hazardous waste and sewage).
污染治理：预防环境污染，合理管理空气、水体和土壤污染，严格执行废弃物（包括固体、危险与非危险废物及污水）处理和排放标准。
- **Green Innovation:** Increase resources utilization efficiency, optimize the use of raw material and water resources, and promote green innovation in product and process design.
绿色创新：提升资源利用效率，优化原材料和水资源使用，推动产品和工艺设计的绿色创新。
- **Protection of Biodiversity:** Prohibit destructive development such as deforestation in important ecological areas, and implement land protection and restoration measures.
保护生物多样性：禁止在重要生态区域实施毁林等破坏性开发行为，落实土地保护和生态恢复措施。

In the event the employee become aware of the occurrence of any accident which impacts or may impact the environment, the employee shall notify its supervisors, managers or the department in charge of environment issues. The Group must immediately take corrective or preventative measures to prevent or mitigate the damages. The Group shall also keep a record of all the environment events, including a detailed description of the event, the causes and the measures taken for the management and resolution of the event, the reports filed with authorities, if any.

员工发现任何已经或可能对环境造成影响事故时，须立即向直属主管、管理层或公司负责环保问题的部门报告。集团须在第一时间采取纠正及预防措施，最大限度控制并减轻环境损害。同时，集团将完整记录所有环境事件，包括事件的详细描述、原因分析、处置和整改措施，以及向监管部门提交的相关报告（如适用）

Environmental Policy

环境政策

Group guarantees that each member of Group shall pursue objectives consistent with the strategic aims regarding the environment.

集团承诺确保集团所有成员单位的环境保护目标与集团整体环境战略保持高度一致。

In order to take advantage of every possibility for synergy, the determination and implementation of environmental policy are handled in a unified, consistent manner. These activities involve:

为充分发挥协同效应，集团对环境政策的制定与实施实行统一管理，具体包括以下工作内容：

- stipulating policies for the environment and for sustainable industrial development;
制定环境和可持续工业发展政策；
- drawing up guidelines for the implementation of environmental policy which must be referred to by subsidiaries;
编制环境政策实施指南，各子公司必须严格参照执行；
- identifying indicators and ensuring monitoring and control of the results of the Group's actions in terms of environmental impact;
确立环境绩效指标，全面监测并管控集团各项活动对环境的影响；
- following developments in the environmental legislation of relevant jurisdictions and preparing implementation guidelines for subsidiaries;
跟踪各运营地环境法规的最新动态，为子公司制定合规实施指南；
- handling relations with organizations, institutes and agencies in the environmental field and promoting, implementing and coordinating understandings and program agreements with similar entities, as well as with government Institutions.
与环保组织、科研机构及政府部门建立并维护合作关系，推动落实各项环保合作协议。

Each member of Group shall have within its ranks key professional figures and/or operating structures responsible for the specific tasks and issues.

集团的每个成员都应在其队伍中设有负责具体任务和问题的关键专业人员和/或运营结构。

Strategies and instruments of environmental Policy

环境政策的战略和工具

Group's environmental Policy is also backed by the awareness that the environment can represent a competitive advantage in a market that continues to expand and is ever more demanding with regard to quality and conduct.

集团深刻认识到，在日益注重质量与可持续发展的市场中，良好的环境实践可以成为重要的竞争优势。

Group's strategy is based on investments and activities that respond to the principles of sustainable development; in particular:

集团的环境政策以可持续发展为核心，重点推进以下战略举措：

- dedicating to the investment to the production of energy from renewable sources;
重点发展可再生能源生产项目；
- in the context of national and international bodies and programs, promoting activities and forms of behavior that consider the environment to be a factor of strategic importance.
通过参与国内外环保计划，推动将环境保护纳入战略决策；
- Group promotes the following instruments of environmental policy:
集团通过以下具体措施落实环境政策：
- voluntary agreements with environmental and professional Institutions and associations;
与环保机构、行业协会签订自愿协议；
- systems of Environmental Management that are certified under ISO 14001 and the relevant conventions, regulations, and that are geared towards achieving continuous improvement in environmental services and organization;
建立符合 ISO 14001 标准的环境管理体系，确保环保绩效持续改进；
- a system for the periodic reporting of environmental data, designed to ensure control of the performance levels of the various industrial activities;

实施环境数据定期报告制度，监控各生产环节的环保表现；

- activities designed to increase the environmental awareness and training of employees, with the objective being to spread information on initiatives internally while increasing the know-how and professional skills of employees;
- 开展员工环保意识培训，提升专业能力并推动内部环保实践；programmes targeted at customers to promote the rational use of energy;
针对客户的计划，以促进合理使用能源；
- implementation of portals devoted to instilling a “culture” of the environment and to the promotion of local initiatives.
建立专门的门户网站，用于培养环境保护意识文化并推广当地环境保护计划。

Environmental communications

环境通信

Group, from time to time, reports on the implementation of environmental policy and the consistency of the results obtained with the objectives set by publishing an annual Environmental Report, which is also an integral part of the Sustainability Report. This report illustrates:

集团定期发布《年度环境报告》（该报告同时作为《可持续发展报告》的重要组成部分），详实披露环境政策实施进展及目标达成情况。报告主要包括：

- the most meaningful environmental events (for example, the certification of Environmental Management Systems, the upgrading of plants and machinery, voluntary agreements and various types of initiatives for the protection of the environment and the local areas and communities);
重大环境管理事项（包括但不限于：环境管理体系认证、生产设备升级改造、环境保护自愿性协议，以及针对当地社区开展的各类环保倡议）；
- the main environmental results (energy efficiency, development of renewable sources, water use, the reduction of emissions, waste management etc.);
核心环境绩效指标（涵盖能源利用效率、可再生能源开发成效、水资源管理、污染物减排及废弃物处理等核心领域）；
- the profiles of the Group members, which highlight their presence in various fields of activity and examine the environmental sector in depth.
集团成员企业专项报告（系统呈现各业务单元环保措施概况，并附重点领域环境管理深度分析）。

Group undertakes to provide access to environmental information in compliance with considerations of industrial confidentiality.

集团承诺在确保商业秘密的前提下依法公开环境信息。

Health and Safety

健康和安全

The Group considers the health, safety, and psychological, relational, and physical well-being of individuals the most precious asset to be protected in any moment, at work, as well as at home and during leisure time. The Group dedicates itself to provide each employee with a safe and healthy work environment, and its goal is to have almost zero injuries as possible and to achieve the safest factories in the solar industry. To realize its goals, the Group requires its employees to raise safety concerns and take relevant measures to solve those hidden safety hazards by constantly providing training activities, sharing knowledge and benchmarking the practices. Suppliers and partners of the Group are an integral part in the development and awareness of health and safety, each person must feel that they are responsible for their own health and safety as well as for the others.

集团视员工健康安全为最宝贵的资产，无论是在工作场所、家庭生活还是休闲活动中。我们承诺为所有员工提供安全健康的工作环境，力争实现“零事故”目标，打造光伏行业安全典范。集团通过持续开展安全培训、知识分享和最佳实践对标，要求全体员工及时报告安全隐患、积极参与安全整改并严格遵守安全操作规程。同时，我们将供应商和合作伙伴纳入安全管理体系，要求各方共同承担健康安全责任。

The Group also asks the employees to perform their duties in a safe manner, free of the influences of alcohol, illegal drugs or other controlled substances. The use of illegal drugs or other controlled substances in the workplace is prohibited. Additionally, the employees are expected to report (either openly or confidentially) accidents or any unsafe equipment, behavior or conditions to their manager, supervisor, Human Resources or the Compliance and Internal Control Department.

集团要求员工在履行职责时确保自身安全，禁止工作期间受酒精或违禁药物影响，严禁在工作场所使用非法药物及管制物质。此外，员工如发现任何安全隐患或事故，应立即向直属主管、人力资源部或内控部门（实名/匿名方式）报告。集团通过持续的安全培训、知识分享和最佳实践对标，不断提升整体安全管理水平。

Forced Labor and Child Labor **强迫劳动和童工**

In addition to guaranteeing the necessary quality standards, the Group is also requested to adopt the best practices in terms of human rights and working conditions (including adequate hours worked, forced or child labor, respect for personal dignity, non-discrimination and inclusion of diversity, freedom of association and collective bargaining), occupational health and safety, environmental responsibility, and respect for data protection by design and by default.

除了保证必要的质量标准外，集团还须在人权和工作条件方面采用最佳实践（包括合理工时、禁止强迫劳动和童工、尊重个人尊严、反歧视并包容多元、结社自由和集体谈判权）、职业健康和安全、环境责任，以及在设计和默认情况下尊重数据保护。

Principles **原则**

The Group shall at all times comply with local regulations and laws, as well as international standards, such as International Charter of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, OECD Guidelines for Multinational Enterprises and the United Nations Convention on Children's Rights, the European Convention on Human Rights, Modern Slavery Act 2015 and other applicable laws and regulations without any political bias or ideological prejudice.

集团应始终遵守当地法规和法律，以及包括《国际人权宪章》、国际劳工组织《关于工作中基本原则和权利宣言》、经合组织《跨国企业准则》和联合国《儿童权利公约》、《欧洲人权公约》、2015年《现代奴役法》在内的国际标准及其他适用的法律法规，且不得存在任何政治或意识形态偏见。

Establishing the labor relation with legal contract **建立合法劳动关系**

Employee is hired with regular employment contracts. No form of irregular employment is tolerated. At the time the employment relationship is established, each employee receives accurate information regarding:

员工必须通过正规劳动合同聘用，严禁任何形式的非正规雇佣。建立劳动关系时，用人单位应向员工如实、准确告知以下事项：

- the characteristics of the function and the tasks to be performed;
岗位特征及工作内容；
- rules of employment and salary considerations;
雇佣条款与薪酬待遇
- regulations and procedures to be adopted in order to avoid possible health risks associated with his or her duties.
为防范职务相关健康风险需遵守的规章制度及操作流程。

This information is presented to the employee in such a way that acceptance of the job is based on an effective understanding thereof.

上述信息应以确保员工充分理解为前提进行告知，保障其基于真实意思表示接受工作岗位。

Forced Labor**强迫劳动**

The Group shall never employ or make anyone working against his or her will or conduct business with business partners that promote or use such practices.

集团严禁任何形式的强迫劳动，包括但不限于非自愿雇佣或强制劳动，并禁止与存在、纵容或实施强迫劳动的商业伙伴开展业务。

Child Labor**童工**

The Group shall not use child labor or conduct business with business partners using child labor. The term “child” means any person under the statutory minimum age applicable to employees where the work is performed, provided the legal age is consistent with the minimum working ages defined by the International Labor Organization.

集团禁止使用童工，且不得与存在使用童工行为的商业伙伴开展合作。“童工”指未达到工作所在国家/地区法定最低就业年龄的劳动者，且该法定年龄须不低于国际劳工组织（ILO）规定的最低工作年龄。

Human Trafficking**人口贩运**

The Group shall refrain from the recruitment, transportation, transfer, harboring or receipt of persons, by means of force, fraud or coercion for the purpose of exploitation. They shall also refrain from using or providing labor or services procured illegally, and notably through migrant smuggling.

集团不得以剥削为目的，通过暴力、欺诈或胁迫等手段招募、运输、转移、窝藏或接收任何人员；同时，集团亦不得使用或提供通过上述方式，特别是通过偷渡等非法途径获取的劳工或服务。。

Employment Practices**雇佣实践**

The Group shall ensure that all its employees are provided with a written employment contract, in a language understandable to the employee and voluntarily signed by the employee prior to its performance of work. The Group must ensure that they respect the rights of its employees and comply with all applicable laws and regulations in the country or countries in which they operate. This includes all rights and minimum standards relating to wages, benefits and working conditions. The Group shall comply with the applicable legal requirements for employee compensation and working hours. The Group are expected to respect the freedom of association and their rights to communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or retaliation.

集团应确保所有员工在开始工作前获得一份以其可理解的语言书写并自愿签署的书面劳动合同。集团严格遵守运营所在地关于工资、福利和工作条件的所有适用法律法规（包括最低标准），依法执行员工薪酬和工时的规定。集团承诺尊重员工的结社自由及就工作条件与管理层公开沟通的权利，禁止任何形式的骚扰、恐吓、惩罚、干扰或报复行为。

Group guarantees the physical and moral integrity of its people, working conditions that are respectful of personal dignity and personal freedoms, and safe and healthy workplaces.

集团保证其员工的身心健康，提供尊重个人尊严和个人自由的工作条件，以及安全健康的工作场所。

The Group also applies a policy of zero tolerance for any form of harassment, intimidation, mobbing, or stalking in the workplace.

集团对职场中的任何形式骚扰、恐吓、精神虐待或跟踪骚扰采取零容忍政策。

Requests or threats aimed at inducing people to act in conflict with the law, the Code of Conducts and Ethics, or

the internal policies, or to adopt behaviors that are detrimental to personal convictions and preferences, are not tolerated.

集团绝不容忍任何诱导员工违反法律法规、行为道德准则、内部政策，或迫使其做出有损个人信念行为的要求或威胁。

Conflict Minerals Policy 冲突矿产政策

The Group shall adhere to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The Group shall progressively integrate due diligence management of the mineral supply chain into our supplier management practices and require our core suppliers to affirm their commitment to the Guarantee of Non-Use of Conflict Minerals.

集团应当遵循《OECD 经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》，应逐步将矿产供应链尽职管理纳入供应商管理工作中，并要求核心供应商签署《不使用冲突矿产保证书》。

The Group shall establish a formalized process/operating procedure to track minerals through the supply chain and identify and assess risks from minerals associated with conflict-affected and high-risk areas, including:

集团应建立正式的流程/操作程序来跟踪供应链中的矿物并识别和评估来自冲突矿产的风险。具体措施有：

- Require a report on the necessity of using the mineral;
使用该矿物的必要性原因报告；
- Conducting supply chain due diligence involves on-site surveys, questionnaires, and interviews to identify mineral sources, verify responses, and determine the country of origin;
对供应链进行尽职调查，包括现场调查、调查问卷、员工访谈等，以识别矿物来源、响应验证、产地确认；
- Responsiveness verification: The Group shall conduct independent third party audits on a regular basis of compliance with responsible supply chain due diligence efforts and effectiveness of response procedures and responses to improve due diligence practices for smelter/refinery and supply chain upstream companies, including through the establishment of institutionalized mechanisms in industry initiatives with government support and stakeholder cooperation;
响应验证：集团应当定期对负责任供应链尽职调查工作的合规性以及响应程序和响应措施的有效性开展独立第三方审计，从而改善冶炼/精炼企业和供应链上游企业的尽职调查实践，这包括在政府的支持下、利益相关方的合作下，通过在行业倡议活动中建立制度化机制进行审计；
- Country origin determination: After identifying the smelting/refining enterprises of refined metals used in the supply chain, the Group shall participate in the supply chain of these smelting/refining enterprises, and obtain preliminary information about the country of origin of minerals, transit countries, transportation routes between mines and smelting/refining enterprises.
产国确定：在识别了供应链所使用的精炼金属的冶炼/精炼企业后，集团应参与到这些冶炼/精炼企业的供应链之中，并从中获得有关矿产原产国、中转国、矿山到冶炼/精炼企业之间运输路线等内容的初步信息。

The Group shall develop supply chain-level management plans to address identified risks and mitigate or remediate issues related to minerals from conflict-affected areas.

集团应在供应链层面制定管理计划来应对识别出的风险，以减轻或补救来自受冲突地区的矿物的风险。

- Risk mitigation plan: The Group shall create tailored risk mitigation plans for identified high-risk suppliers, which may include selecting alternative suppliers and adjusting our supply chain as necessary.
风险缓解计划：针对识别出的高风险供应商，集团应当制定具体的风险缓解计划，包括替代供

应商的寻找和供应链的调整。

- Remediation: If high-risk minerals are identified, the Group will promptly take remedial actions, such as suspending procurement, reassessing suppliers, or providing support to affected areas as needed.
补救措施：对于发现存在风险的矿物，集团应当立即采取补救措施，如停止采购、重新评估供应商或向受影响的地区提供支持。

Money Laundering / Suspicious Activities **洗钱/可疑活动**

Money laundering (i.e., using transactions to conceal the illegal source of funds or make such funds look legitimate) is strictly prohibited. Any suspicious activity that the employees believe involves money laundering should be reported to the Compliance and Internal Control Department and Internal Audit Department. Here are some examples of suspicious activity:

洗钱行为（即通过交易掩饰资金非法来源或使其看似合法）被严格禁止。员工发现任何涉嫌洗钱的可疑活动，必须立即向内控部门及审计部报告。如下列情形可视为可疑活动：

- Large payments in cash;
大额现金交易；
- Payments made in currencies atypical given the circumstances or differing from what is listed in the contract;
异常币种支付；
- Requests for payment amounts that differ from what is required in the contract; or
要求支付与合同要求不符的金额；或
- Payments made by someone or a company that is not party to the contract.
由非合同方的个人或公司支付。

Export Control **出口管制**

The Group endeavors to strictly comply with all applicable laws and regulations relating to the import and export of goods they provide or services they render. In particular, the Group shall take measures to avoid acting in any manner that would result in a violation of any applicable sanction laws, administered or enforced by any national or international authority.

集团致力于严格遵守与其提供的货物或服务的进出口相关的所有适用法律法规。特别是，集团应采取措施，避免以任何方式违反任何国家或国际机构管理或执行的适用制裁法律法规。

Waivers of the Code of Business Conduct and Ethics **准则豁免机制**

Waivers of this Code will be granted on a case-by-case basis and only in extraordinary circumstances. Waivers of this Code may be made only by the Board of Directors, and any waiver granted to any employee of the Group will be promptly disclosed to the public, to the extent required by law or the rules of any exchange on which the Group's securities are listed.

本《行为准则》的豁免仅可在特殊情况下，根据具体情形逐案审批。所有豁免决定必须由董事会作出，且根据适用法律或集团证券上市交易所规则的要求，对集团员工授予的任何豁免均应及时进行公开披露。

Reporting any Illegal or Unethical Behavior **报告任何非法或不道德行为**

Employees are encouraged to talk to supervisors, managers or other appropriate personnel about illegal or unethical behavior and when in doubt about the best course of action in a particular situation. Depending on the situation,

you may also contact the Compliance and Internal Control Department, the Internal Audit Department or Human Resources Department.

本集团鼓励员工在发现违法违规或违反职业道德的行为时，或对特定情形下的最佳处理方式存在疑问时，及时向直属主管、部门负责人或其他相关管理人员反映。根据具体情况，员工亦可直接联系内控部门、审计部、人力资源部。

The Group does not to allow retaliation for reports of misconduct by others made in good faith by employees. Employees are expected to cooperate in internal investigations of misconduct, so the Group encourage employees not to report the illegal or unethical behavior anonymously, to enable the department in charge to contact the reporting employee to obtain more information. Any employee may submit a good faith concern regarding questionable accounting or auditing matters without fear of dismissal or retaliation of any kind. The ethics breach can be reported (i) by email: anti-fraud@risen.com; or (ii) by phone: 0574-59982178.

集团严禁对员工基于善意举报他人不当行为而实施任何形式的报复。员工有义务配合集团对不当行为开展的内部调查。为提高调查效率，我们建议员工优先采取实名举报方式，以便相关部门能与举报人取得联系并获取更多信息。员工就可疑的会计或审计问题提出善意质疑时，无需担心受到解雇或其他任何形式的报复。道德违规举报渠道：(i) 举报邮件： anti-fraud@risen.com；(ii) 举报电话：0574-59982178。

Executive Body 执行机构

The Compliance and Internal Control Department within Group is responsible for the following tasks covered by the Code:

集团合规和内控部门作为本准则的执行机构，主要职责如下：

- examining the periodic reports prepared by the auditors concerning the violations of the Code of a given seriousness;
审议审计部门提交的准则违规定期评估报告，并对违规行为的严重程度进行认定；
- submitting any modifications or additions to the Code to the approval of the Group Board of Directors;
负责准则的修订工作，拟定修改或补充条款后提交集团董事会审批；
- coordinating the investigation by different functions based on the report or whistleblowing covered by this Code.
依据本准则受理相关举报事项，协调各职能部门开展联合调查工作。

Subordination by Suppliers 供应商的从属义务

Group shall ensure its suppliers and subcontractors in different layers to commit to aligning with or fully respecting and complying with this Code in the course of providing the supplies or services either by inserting necessary commitment in orders or contracts or procuring a separate acknowledgement and acceptance letter to be signed by such supplier or subcontractor.

集团应确保其不同层级的供应商和分包商在提供供应或服务的过程中，通过在订单或合同中插入必要承诺或获取此类供应商或分包商签署的单独确认和接受函，承诺遵循或完全尊重并遵守本准则。

Certification 认证

Upon employment by and requirement of the Group, all employees are expected to certify, in writing or electronically, that they have received, read, understood, and will abide by this Code in the form as attached.

根据集团的要求，所有员工在受雇时均应以书面或电子形式确认，已按照附件所示格式收到、阅读、理解并将遵守本准则。

CERTIFICATION OF COMPLIANCE
合规声明

TO: Risen Energy Co., Ltd.

致：东方日升新能源股份有限公司

RE: Code of Business Conduct and Ethics of Risen Energy Co., Ltd.

关于：东方日升新能源股份有限公司《商业行为和道德准则》

The undersigned, hereby certify that the above-referenced Code of Business Conduct and Ethics (the “Code”) have been received, reviewed and understood and I hereby undertake, as a condition to my present and continued employment at or association with Risen Energy Co., Ltd. and/or any of its subsidiaries or branches (collectively, the “Group”), to fully comply with the Code.

本人特此证明，已收到、阅读并理解上述《商业行为和道德准则》（简称“准则”）。本人特此承诺，作为在东方日升新能源股份有限公司及/或其所有子公司、分支机构（统称“集团”）现有及未来任职或建立契约关系的前提条件，本人将严格遵守本准则的各项规定。

I hereby unconditionally and irrevocably certify that I have adhered to and will adhere to the Code during the time period that I have been or will be associated with the Group.

本人特此无条件且不可撤销地保证，在本人与集团已建立或将建立契约关系期间，始终恪守本准则的要求。

Name:

姓名：

职位及所在部门：

Title & Division:

Date:

日期