

# 思源合规行为准则

## Sieyuan Compliance Code of Conduct

### 第一部分 目的与适用范围

### Section I Purpose and Scope of Application

#### 1. 目的

##### Purpose

思源电气股份有限公司及其分子公司（合称“思源”或“公司”）对腐败、贿赂、欺诈等不合规的行为采取零容忍的态度。

Sieyuan Electric Co., Ltd, along with its subsidiaries and branches (collectively, “**Sieyuan**”, the “**Company**” or “**we**”), upholds a zero-tolerance policy against corruption, bribery, fraud and other misconduct.

子公司，包括控股子公司和相对控股子公司，分别指思源电气股份有限公司对其持股比例达到 50% 以上的公司，和思源电气股份有限公司出资额或者持有股份的比例虽然不足 50%，但依其出资额或者持有的股份所享有的表决权已足以对股东会的决议产生重大影响的子公司。

The term “subsidiaries” includes both majority-owned subsidiaries (where Sieyuan Electric Co., Ltd. holds more than 50% of shares) and relatively controlled subsidiaries (where Sieyuan Electric Co., Ltd. holds less than 50% of shares but exercises significant influence on resolutions of the shareholders’ meeting through voting rights derived from its capital contribution or shares).

诚信致远，是思源的核心价值观之一。思源深知合规经营是企业长期发展的不竭动力，是实现可持续发展的重要保障。《思源合规行为准则》（“本准则”），规定了思源每一位员工在思源工作时应遵守的行为标准，这些标准有助于确保公司诚信经营、加强合规文化和维护企业声誉。

Integrity leads to far-reaching success, which remains one of the core values of Sieyuan. Operating in compliance persistently drives long-term development and more importantly, safeguards sustainable development of the Company. Sieyuan Compliance Code of Conduct (the “**Code**”) sets out the standard of conduct that every employee should adhere to during their employment at Sieyuan. The Code serves to ensure that the Company operates with integrity, strengthens the corporate compliance culture and preserves the Company’s reputation.

本准则不仅为了确保思源遵守业务所在的司法区域的法律，还关乎思源的社会

形象——一个公平、诚信和有道德的企业，负责任地经营且做正确的事情。

Not only does the Code ensure that Sieyuan complies with the laws of the jurisdictions in which it operates, it also demonstrates Sieyuan's corporate profile as a fair, honest and ethical company that operates with responsibility and righteousness.

合规经营不仅是公司持续健康发展的保证，也是思源对客户、合作伙伴和社会的庄严承诺。尽管在某些情况下，选择合乎道德行事和遵守法律可能意味着思源失去业务或竞争优势，但是思源拒绝因短期经济利益而使思源声誉受损。从长远来看，思源将受益于自身的合规行为和秉持的道德标准。

Operating in compliance not only safeguards the Company's sustainable and healthy development, but also manifests our solemn commitment to our clients, business partners and society. Although in some circumstances, acting ethically and in compliance with laws and regulations may result in Sieyuan losing business or competitive advantage, yet we refuse to compromise our reputation for short-term financial interests. In the long run, Sieyuan will benefit from its compliance and the ethical standards it upholds.

## 2. 适用范围

### Scope of Application

本准则明确了思源核心的合规原则与要求，该等要求适用于思源全球范围内的所有业务。

The Code sets out our core compliance principles and requirements, which equally apply to all the Company's business worldwide.

思源的所有董事、高管、管理人员、全职员工、兼职员工、临时工、合同工以及实习生（合称“员工”）均需要严格遵守本准则的要求。

All employees of Sieyuan, including directors, senior management, officers, full-time and part-time staff, temporary and contract workers, and interns (collectively, the "**Employee(s)**") are obligated to comply with the Code.

思源也将努力促使与思源合作的外部单位和个人以公平、诚信、道德的方式开展业务。

Sieyuan also encourages external entities and individuals that cooperate with Sieyuan to conduct business in a fair, honest and ethical manner.

## 第二部分 诚信合规经营，开展公平竞争

### Section II Operation with Integrity and Fair Market Competition

#### 3. 禁止欺诈

##### Prohibition of Fraud

思源始终坚持诚信原则，严格禁止任何形式的欺诈行为，对与公司业务相关的欺诈行为采取零容忍态度。禁止欺诈不仅是遵守法律法规的基本要求，更是公司长远发展的重要保障。欺诈行为会使得公司面临严重的法律后果，对公司的业务状况和声誉造成直接损害，影响客户和合作伙伴的信任，进而阻碍公司的业务拓展，影响公司的市场竞争力。通过坚决杜绝欺诈行为，思源才能够建立稳固的商业基础，促进公司健康持续发展。

Sieyuan consistently adheres to the principle of integrity and strictly prohibits any forms of fraudulent practices. We maintain a zero-tolerance policy against fraudulent behavior in relation to the Company's business. Prohibition of fraud is not only a basic requirement in compliance with the relevant laws and regulations, but also safeguards the Company's long-term development. Fraudulent practices can entail serious legal consequences that harm the Company's operations and reputation, endanger the trust our clients and partners bestowed on us, hinder our business development, and affect our competitiveness in the market. It is only through combating fraudulent practices in a resolute manner that Sieyuan will be able to establish a solid business foundation to advance healthy and sustainable development of the Company.

为此，思源要求员工以及业务伙伴在代表公司投标或与公司组成联合体投标、获取业务、执行项目等全过程中，严格遵守客户、业主以及其他对公司负有监管、审计权力的相关机构提出的披露要求，真实、准确地展示公司的业绩和资质等各方面情况，不隐瞒、不造假，确保公司的利益和声誉不受损害。思源也为此制定了具体的规则和政策，如《思源反欺诈指引》。

To this end, Employees and business partners throughout the whole process of bidding on behalf of or as a consortium with the Company, securing business and executing projects, are required to comply rigorously with disclosure requirements set forth by clients, employers and other relevant supervisory and auditory institutions. In addition, the Company's performance and qualifications must be disclosed in an authentic and accurate manner. We will not conceal nor falsify information and will preserve the Company's interests and reputation. In pursuit of this, Sieyuan has formulated specific

rules and policies, such as Sieyuan Anti-Fraud Guidelines.

#### 4. 禁止腐败贿赂

##### **Prohibition of Corruption and Bribery**

思源对腐败贿赂行为采取零容忍态度。无论我们业务往来的对象是政府机构、国有企业还是私营企业，思源都坚决反对在任何业务往来中出现腐败或贿赂行为。思源既绝对禁止员工向外部个人或单位行贿，也禁止员工利用职务便利从任何外部个人或单位处受贿。

Sieyuan upholds a zero-tolerance policy against corruption and bribery. The Company stands firm against corruption and bribery in any business dealings, regardless of engagement with either public officials, state-owned enterprises or private entities. Sieyuan strictly prohibits its Employees from offering or accepting bribes involving any external individuals or entities, including using their positions for personal gain.

实践中，腐败贿赂的形式多种多样，包括但不限于现金、礼金、有价证券、实物、回扣、旅游和娱乐等费用，债务免除，以及就业机会等非财产性利益。任何形式的腐败和贿赂行为都会对公司的声誉和经营带来严重的负面影响，某些情况下还可能使得公司面临法律诉讼、罚款，甚至刑事处罚，给公司的经营和发展带来重大障碍。

In practice, the forms of corruption and bribery are diverse, including but not limited to cash, cash gifts, negotiable securities, tangible products, kickbacks, travel and entertainment expenses, debt forgiveness, and non-monetary benefits such as employment opportunities. Any form of corruption and bribery can have serious negative impacts on the Company's reputation and operations. In some cases, the Company may be exposed to legal proceedings, fines and even criminal penalties, which may result in significant obstacles to the Company's operation and development.

思源在开展业务的过程中坚持践行高标准的诚信和道德规范，以提供高品质的产品、服务和解决方案赢得业务，确保公司所有市场开发、业务关系维护的行为都符合法律规定。思源为此也制定了具体的规则和政策，如《思源反腐败反贿赂指引》。

Sieyuan upholds high standards of integrity and ethics, and secures business through high-quality products, services, and solutions. We ensure that all our activities of market development and business relationship maintenance

comply with relevant laws and regulations. In pursuit of this, Sieyuan has formulated specific rules and policies, such as the Sieyuan Anti-Corruption and Anti-Bribery Guidelines.

## 5. 禁止串通和胁迫 Prohibition of Collusion and Coercion

思源支持公开公平的市场竞争，严格遵守公平竞争与反垄断领域的法律法规。思源始终坚持通过合法和合规的手段赢得市场，坚决反对任何形式的串通和胁迫行为。

Sieyuan encourages open and fair competition and strictly adheres to fair competition and anti-monopoly laws and regulations. We insist on attracting clients in a legal and compliant manner and stand firm against any forms of collusion and coercion.

在投标过程中，思源禁止围标、串标、陪标等不正当的串通行为，员工或任何代表公司行事的业务伙伴，包含与公司组成联合体的业务伙伴，不得私下与竞争对手交换涉及竞标、价格等方面的商业敏感信息。如果在商业或社交场合中遇到类似讨论，思源员工应保持敏感，知悉主动或被动地获知非公开信息可能会让公司陷入合规风险。

Throughout the tendering process, Sieyuan prohibits any forms of collusion such as bid-rigging, collusive bidding and cover bidding. Employees or business partners acting on behalf of the Company, including those engaged in a consortium with the Company, shall not privately exchange sensitive business information such as bid details and prices with competitors. If Employees encounter similar discussions in business and social settings, they should remain alert and be aware that active or passive access to non-disclosed information may expose the Company to compliance risks.

思源也禁止任何形式的胁迫行为。思源员工或代表公司行事的业务伙伴，包含与公司组成联合体的业务伙伴，不得以任何方式胁迫第三方与公司进行交易，也不不得以任何手段胁迫竞争对手放弃交易机会。思源提倡在公平、透明和自愿的基础上开展业务合作。

Sieyuan also prohibits any forms of coercion. Employees or business partners acting on behalf of the Company, including those engaged in a consortium with the Company, shall not, in any manner, coerce third parties to enter into a transaction with the Company, nor shall they force competitors to relinquish

market opportunities. Sieyuan encourages business cooperation on a fair, transparent and voluntary basis.

## 6. 遵守反洗钱法律法规

### **Compliance with Anti-money Laundering Laws**

思源严格遵守中国反洗钱法律法规，以及业务开展涉及到的国家（地区）适用于思源的相关法律法规。

Sieyuan rigorously adheres to anti-money laundering laws of the People's Republic of China (the "PRC"), as well as those applicable in the countries (regions) where the Company operates.

员工在开展业务的过程中，应当全面了解客户，包括客户背景、资金来源以及交易目的，与资金来源合法且声誉良好的对象合作。在接收付款时，员工应当严格遵守公司的财务制度和流程，保留相关交易记录。对于任何超出正常业务范围的付款、频繁的大额交易或其他异常情况，员工应保持高度警惕。在发现任何非法活动迹象时向公司合规管理部门报告和咨询，获取进一步指导。

In the course of business development, Employees should familiarize with the clients in a comprehensive manner, including their background, financial sources and the purpose of transactions to ensure that Sieyuan only engages with those who have lawful financial sources and maintain good reputation. When receiving payments, Employees should abide by the Company's financial policies and procedures and maintain relevant transaction records. Employees should also remain alert with respect to any payments outside the normal scope of business, frequent transactions in large sums or other unusual circumstances. Employees who detect any suspicious activities shall promptly seek advice and report to the compliance management department for further guidance.

## 7. 遵守出口管制和经济制裁法律法规

思源遵守其业务开展所应适用的相关国际组织以及国家（地区）在经济制裁与出口管制方面的法律法规要求，包括对特定产品、技术、服务的出口限制，以及对某些国家、地区、组织或个人实施的经济制裁措施。

如员工在业务过程中对涉及的交易对象或涉及的产品或技术是否可能违反相关法律法规有任何疑问，应及时向合规管理部门进行咨询。

Sieyuan adheres to the relevant laws and regulations on economic sanctions

and export controls imposed by international organizations and countries (regions) applicable to its business operations. This includes export restrictions on specific products, technologies, and services, as well as economic sanctions against certain countries, regions, organizations, or individuals.

If Employees have any doubts about whether the transaction parties, products, or technologies involved in business activities might violate these laws and regulations, they should promptly seek guidance from the compliance management department.

## 8. 遵守财税制度

### **Compliance with Taxation Laws and Regulations**

思源严格遵守中国以及其他业务所在国家（地区）的税收法规和政策。所有税务申报必须真实、准确，并及时提交，避免任何形式的虚报、漏报或迟报行为。遵守税法是公司的法律义务，也是公司诚信经营的重要体现。

Sieyuan rigorously complies with taxation laws of the PRC, as well as those applicable in the countries (regions) where the Company operates. All tax filings shall be authentic, accurate and completed in a timely manner to avoid any misrepresentation, omission or delay. Compliance with tax laws and regulations is a legal obligation of the Company and also demonstrates our ethical operation.

思源严格禁止任何形式的税务欺诈行为，包括但不限于虚报收入、隐瞒收入、伪造费用以及其他形式的偷逃税款行为。思源要求员工在处理税务事务时，必须保持高度的职业操守和法律意识，确保公司的税务行为符合法律和道德标准。

Sieyuan strictly prohibits any form of tax fraud, including but not limited to misrepresenting and concealing income, falsifying expenses and other behavior aiming to avoid or evade tax. Employees are required to maintain a high standard of professional ethics and legal awareness when dealing with tax affairs and ensure that the Company's tax behavior complies with legal and ethical standards.

### 第三部分 加强内部管控，保护公司合法权益

## Section III Internal Controls and Protection of Company Legal Interests

### 9. 保护公司资产

#### Protection of Company Assets

保护公司设备、材料及其他资产（例如土地使用权、知识产权等无形资产）是每一位员工的责任。思源严禁任何盗窃、损坏、滥用或未经授权占用或使用公司资产的行为。

It is the responsibility of every Employee to protect the Company's equipment, materials and other assets, such as intangible assets including land use rights and intellectual property rights. Theft, damage, abuse, misappropriation or unauthorized usage of the Company's assets are strictly prohibited.

思源要求所有员工妥善使用和维护公司提供的设备和材料，避免因操作不当或疏忽导致的损坏或丢失。知识产权是公司宝贵的无形资产，包括专利、商标、版权等。员工应确保这些无形资产得到充分保护，不得未经授权使用公司的知识产权。

Employees are entrusted with responsibilities of appropriate utilization and active protection of the equipment and materials provided by the Company against damage or loss resulting from improper handling or negligence. Intellectual property rights including patents, trademarks and copyrights are invaluable intangible assets under the ownership of the Company. Employees shall ensure that these intangible assets are accorded adequate protection and shall not utilize them without the Company's authorization.

### 10. 避免利益冲突

#### Avoidance of Conflict of Interests

员工不得参与或影响与其个人利益相关的业务决策，这种个人利益可能基于经济关系（例如在供应商、分包商等业务伙伴处持有经济利益），也可能与人身关系有关（例如与其他员工、供应商、分包商有家庭或恋爱关系）。

Employees shall refrain from participating or influencing the decision-making on matters in which their personal interests are involved. Such personal interests may stem from economic relationships (such as financial interests in business partners including suppliers and subcontractors), or personal relationships (such as family or romantic relationships with other Employees, suppliers and subcontractors).



在发现任何可能引发利益冲突的情况时，员工应及时向公司报告，避免利益冲突。公司将根据具体情况，采取适当措施来解决或缓解利益冲突，以确保所有商业决策的公正性和透明度。

Employees must immediately disclose any circumstances that could result in a conflict of interest to avoid potential issues. The Company, taking into account the specific circumstances, will adopt appropriate measures to resolve or mitigate conflicts of interest, so as to ensure fairness and transparency in all business decisions.

## 11. 保守商业秘密与公司保密信息 Confidentiality

未经批准和授权，员工不得向思源以外的任何人披露在业务过程中了解到的关于思源、思源的业务或与思源的业务相关的任何第三方（包括思源的客户、供应商或其他业务伙伴）的信息。保守商业秘密和公司保密信息是每位员工的基本职责。

Employees shall not disclose information about the Company, the Company's business, or any relevant third parties (including the Company's clients, suppliers, or other business partners) that they obtain during the course of business to external parties without the approval and authorization of Sieyuan. Employees are required to maintain trade secrets and confidential information.

商业秘密和公司保密信息包括但不限于：技术信息、研发计划、市场策略、客户和供应商名单、财务数据、人事信息以及其他未公开的商业信息。员工在处理这些信息时应当特别谨慎，确保其安全性和保密性。公司提供的电子邮件、文件传输工具和存储设备应当严格按照公司政策使用，防止信息泄露。

Trade secrets and confidential information include, but are not limited to, technical data, research and development plans, marketing strategies, client and supplier lists, financial data, personnel information, and other undisclosed business information. Employees are expected to take special care while handling such information to ensure its security and confidentiality. E-mails, file transfer tools and storage devices provided by the Company shall be used in strict accordance with the Company's policies to prevent information leakage.

即使员工离开思源或不再与思源业务有任何关联后，员工仍应继续履行保密义务。这包括遵守员工与思源签署的合同中的保密条款，不得将任何思源商业秘密或保密信息用于个人利益或提供给第三方。

In the event any Employee leaves Sieyuan or is no longer involved with the Company's business, such Employee shall continue to undertake the confidentiality obligation after the termination of his/her employment. This includes complying with confidentiality clauses in the employment contract, and refraining from manipulating the Company's trade secrets or confidential information for personal gain or providing it to third parties.

## 12. 禁止内幕交易

### Prohibition of Insider Trading

如果员工收到或知晓与思源业务相关的、涉及思源或者其他上市公司的保密信息，且该等保密信息不为公众所知，并可能对其他人投资思源或者该等公司或出售思源或者该等公司股票的决定产生影响，请员工务必保持警觉。披露该等信息及随后的任何交易都可能构成内幕交易，这是法律严禁的行为。

Employees are expected to be vigilant if they receive or become aware of confidential information related to Sieyuan or other listed companies involved with the Company's business, if such confidential information is not publicly disclosed and may impact others' decisions to invest in or to sell their shares of Sieyuan or other companies. Disclosure of such information and any subsequent transactions may constitute insider trading, which is strictly prohibited by laws and regulations.

具体而言，如果员工在工作中获知任何可能影响思源股价的保密信息，如尚未公布的财务业绩、重大合同、并购计划或其他重大事件，员工不得利用这些信息进行股票买卖，也不得将该信息泄露给他人，包括员工的家人和朋友。任何违反内幕交易规定的行为，不仅会给公司带来严重的法律风险和声誉损害，还会对员工的职业生涯造成不可挽回的负面影响。

Specifically, if an Employee learns of any confidential information that may affect Sieyuan's stock price during work, such as unannounced financial results, major contracts, mergers and acquisitions plans, or other major events, the Employee shall not rely on such information to buy or sell shares, nor shall he/she disclose such information to others, including his/her family and friends. Any violation of insider trading laws and regulations will not only result in serious legal risks and reputational damage to the Company but will also cause irreparable harm to the Employee's career.

## 13. 保护公司网络和数据安全

### Protection of Network and Information Security

保护公司网络和数据安全对于保障公司运营和维护客户信任具有重要意义。思

源要求所有员工严格遵守公司的网络安全和数据管理政策。

Network and information security is essential to safeguarding the Company's operations and maintenance of clients' trust. Employees are required to strictly adhere to the Company's cybersecurity and data management policies.

员工应按照公司要求使用密码、安全认证等信息保护措施，避免在不安全的网络环境中处理敏感信息。公司提供的设备和工具应按规定使用，不得将机密信息通过未经授权的渠道传输。

Employees shall adopt information protection measures such as passwords and security authentication in accordance with the Company's requirements and avoid handling sensitive information in unsecured network environments. Equipment and tools provided by the Company shall be used in accordance with internal rules and confidential information shall not be communicated through unauthorized channels.

思源还要求员工在处理和存储数据时，遵循相关的法律法规和公司政策，包括但不限于数据隐私保护和数据泄露报告等规定。任何发现的网络安全威胁或数据泄露，应立即报告给信息技术部门，以便公司及时采取应对措施，防止进一步的损失。

Employees are also required to comply with relevant laws, regulations and the Company's policies with respect to the processing and storage of data, including but not limited to data privacy protection and reporting of data breach. Any cybersecurity threat or data breach identified shall be reported immediately to the information technology department so that the Company can take timely measures to prevent further losses.

#### 第四部分 助力员工发展，积极回馈社会

### Section IV People-Oriented and Proactive Fulfillment of Corporate Social Responsibility

#### 14. 保障员工权益

##### Protection of Employee Rights and Interests

思源致力于为全体员工提供安全、健康和公平的工作环境。思源严格遵守中国劳动用工相关的法律法规和其他业务所在国家（地区）的法律法规，确保员工的合法权益得到保障。思源坚决禁止雇佣和使用童工，抵制一切形式的强制性劳动，确保所有员工在公平和获得尊重的环境中工作。

Sieyuan is committed to providing Employees with a safe, healthy and fair working environment. The Company strictly abides by the laws and regulations in relation to labor and employment of the PRC, as well as those applicable in the countries (regions) where the Company operates, so that the legitimate rights and interests of the Employees are fully protected. Sieyuan stands firm against child labor and any forms of forced labor. We strive to ensure that all our Employees work in a fair and respectful environment.

思源推行公平的薪酬制度，确保每位员工都能获得与其岗位和贡献相匹配的合理报酬。思源还建立了完善的福利保障体系，为员工提供包括医疗保险、带薪休假、职业健康检查等在内的福利，保障员工的生活质量和工作满意度。

Sieyuan upholds fair remuneration to ensure that every Employee is entitled to reasonable remuneration corresponding to his/her position and contribution. The Company has also established a comprehensive welfare system, providing Employees with benefits including medical insurance, paid leave, and occupational health checkups to safeguard Employees' quality of life and job satisfaction.

为了促进员工的职业发展，思源鼓励员工参与职业培训和发展项目，提供各种内部和外部培训机会，帮助员工提升个人技能和职业素养。思源相信员工的成长和发展是公司持续成功的基础。

To foster Employees' career development, Sieyuan encourages Employees to enroll in vocational training and development programs and offers a variety of internal and external training opportunities to assist Employees in polishing their personal and professional skills. Sieyuan believes that the growth and development of Employees is the foundation of the Company's continued

success.

思源坚决反对任何形式的歧视和骚扰，无论是基于种族、性别、年龄、宗教、民族、残疾或任何其他原因。思源致力于营造和谐、包容的企业文化，确保每位员工的尊严和权益得到充分尊重和保护，同时鼓励员工之间的相互尊重和合作，共同构建积极向上的工作氛围。

Sieyuan strictly opposes any forms of discrimination and harassment based on race, gender, age, religion, ethnicity, disabilities or any other grounds. The Company is dedicated to creating a harmonious and inclusive corporate culture, ensuring the dignity and rights of each Employee are fully respected and protected. We also encourage mutual respect and cooperation among Employees to maintain a supportive working atmosphere.

## 15. 保护生态环境

### Environmental Protection

思源高度重视环境保护，努力在业务运营中减少环境影响。公司严格遵守环境相关的法律法规，实施绿色生产，通过不断优化生产工艺和技术，努力降低能耗和排放。公司积极推行环保措施，包括资源回收利用、减少废物排放、节能降耗等，以实际行动保护生态环境。

Sieyuan highly values environmental protection and is committed to minimizing the impacts of its operations on the environment. The Company complies with the relevant environmental protection laws and regulations and implements green manufacturing. Through continuous optimization of production methods and technologies, Sieyuan strives to reduce energy consumption and emissions. The Company has also been proactive in encouraging environmental protection practices such as recycling, waste reduction, energy conservation.

思源也致力于减少碳排放，推行低碳经济的发展。公司采取了一系列措施，包括提高能源使用效率、开发和应用可再生能源、优化物流和供应链管理等，为应对全球气候变化做出贡献。

Sieyuan is also committed to reducing carbon emissions and bolstering the development of a low-carbon economy. The Company has adopted a series of measures to combat climate change including improving energy efficiency, developing and utilizing renewable energy, and optimizing logistics and supply chain management.

## 16. 履行社会责任

### **Fulfillment of Social Responsibility**

履行社会责任不仅是企业的义务，也是企业可持续发展的重要基础。思源积极履行社会责任，通过各种方式支持和回馈社会，为员工、客户和股东创造更大的价值。公司将社会责任融入企业文化，鼓励员工积极参与公益活动，如社区服务、慈善捐助、志愿服务等，为创造更美好的未来做出贡献。

Fulfilling social responsibility is not only a duty but also a cornerstone for sustainable corporate growth. Sieyuan is committed to its social responsibility and supports the community through various initiatives, creating greater value for Employees, clients, and shareholders. The Company integrates social responsibility into its corporate culture and encourages Employees to take the initiative in participating in public welfare activities, such as community service, charitable donations and volunteer services to contribute to the building of a better future.

思源坚信，一个富有社会责任感的企业，才能在激烈的市场竞争中立于不败之地，实现长期稳健的发展。

Sieyuan firmly believes that an enterprise with a strong sense of social responsibility will emerge undefeatable in the current competitive market and achieve long-term robust development.

## 第五部分 记录保存、咨询、报告与违反后果

### Section 5 Record keeping, Consultation, Report and Consequences of Non-Compliance

#### 17. 妥善保存记录

##### Record keeping

思源绝对禁止伪造、篡改或隐瞒任何财务或非财务记录的行为。员工以及为思源提供服务的业务伙伴应当确保所有涉及公司业务的财务或非财务事项的记录真实、准确，并完整、及时地体现在相关账簿和记录中。

Sieyuan strictly prohibits falsification, alteration or concealment of any financial or non-financial records. Employees and business partners providing services to Sieyuan shall ensure that all financial and non-financial records involving the Company are authentic, accurate and are reflected in the relevant books and records in a complete and timely manner.

为了保证记录的真实性和完整性，员工在进行记录时必须严格按照公司的内控政策和程序操作，对记录进行核查和更新。公司还会开展内部审计和外部审计，以确保所有账簿和记录的准确性和合规性。

Employees must ensure the accuracy and completeness of records by strictly following the Company's internal control policies and procedures and regularly verifying and updating them. The Company will also conduct internal and external audits to ensure the accuracy and compliance of all books and records.

此外，思源要求所有记录和账簿按照法律法规要求和公司政策妥善保管。员工必须确保这些记录在规定的保存期限内完好无损，不得擅自销毁、丢失或篡改。对于电子记录，应当采取必要的备份和加密措施，以防止数据丢失或泄露。

In addition, all records and books shall be stored in accordance with legal and regulatory requirements as well as the Company's policies. Employees shall ensure that these records are intact within the mandatory retention period and shall not be destroyed, lost or tampered with. With respect to electronic records, necessary backup and encryption measures shall be adopted to prevent loss or leakage of data.

#### 18. 本准则的使用与分发

##### Usage and Distribution of the Code

思源全体员工应当认真阅读并理解本准则的各项内容，确保其日常工作行为与公司的合规理念和合规要求保持一致。

All Employees shall carefully read and understand each requirement under

the Code and ensure that daily work is carried out in a manner consistent with the Company's compliance culture and requirements.

思源员工应当根据公司《思源业务伙伴合规管理办法》的要求，在与相关业务伙伴签订合作协议之前，向业务伙伴提供本准则，并要求业务伙伴认真阅读本指引的内容，了解思源对业务伙伴的合规期待。

Before entering into a contractual relationship with a prospective business partner, in accordance with the Business Partner Compliance Management Measures, Employees should provide the business partner with the Code and request a thorough understanding of the Code and Sieyuan's compliance expectations on its business partners.

思源的管理层以及员工在认为有必要时，还可以将本准则向社会公众、投资人和其他相关方进行展示，传递思源的合规理念，展示思源诚信致远的合规价值观。

Where the senior management and Employees of the Company deem necessary, the Code may also be disclosed to the public, investors and other relevant parties to convey Sieyuan's compliance culture and demonstrate its philosophy of 'integrity leads to far-reaching success'.

## 19. 违反本准则的后果

### **Consequences of Non-compliance**

思源管理层及全体员工任何违反本准则的行为都将面临公司的纪律处分（包括解雇）。

Any violation of the Code by the senior management and all Employees of Sieyuan will be subject to disciplinary actions (including dismissal) by the Company.

业务伙伴任何违反本准则的行为都将导致思源重新评估与业务伙伴的合作关系，在严重情况下思源有权终止与业务伙伴的合作，并追究业务伙伴的违约责任。

Any violation of the Code by Sieyuan's business partners will prompt the Company to re-evaluate its cooperation with them. In serious circumstances, Sieyuan has the right to terminate business cooperation with its partners and hold them liable for breach of contract.

## 20. 报告、咨询与建议

### **Report, Consultation and Recommendations**

思源鼓励思源员工、业务伙伴或者其他相关方积极举报违反本准则的不当行为，也欢迎就本准则中的问题寻求指导，或提供关于本准则进一步修改和完善的建



议。请通过以下渠道与思源合规管理部门联系：

Sieyuan encourages Employees, business partners and other relevant parties to actively report misconduct that violates the Code. The Company also welcomes requests for guidance or suggestions for further modification and updates to the Code. Please contact the compliance management department via the following channels:

电话受理：021-61610952

Telephone: 021-61610952

邮箱受理：hgfbw@sieyuan.com

E-mail: hgfbw@sieyuan.com

来信/来访地址：上海市闵行区华宁路 3399 号思源电气股份有限公司合规法务部（邮编：201108）

Address: Compliance Legal Department, Sieyuan Electric Co., Ltd., No. 3399 Huaning Road, Minhang District, Shanghai (Zip Code: 201108)

思源合规管理部门将根据相关合规政策和程序认真对待举报、咨询或建议。思源接受匿名举报，对实名举报人的身份严格保密，绝对禁止对举报人进行任何形式的打击报复。

The compliance management department of Sieyuan will take reports, inquiries or suggestions seriously in accordance with relevant compliance policies and procedures. Sieyuan accepts anonymous reports and will maintain the confidentiality of the whistleblowers' identity and prohibits any form of retaliation against whistleblowers.

## 21. 生效时间

### Effective Date

本准则自 2025 年 1 月 20 日起生效。

This Code shall come into force on January 20, 2025.