

《海辰行为准则》

Hithium Code of Conduct

厦门海辰储能科技股份有限公司
Xiamen HiTHIUM Energy Storage Technology Co., Ltd.

前 言

PREFACE

厦门海辰储能科技股份有限公司（以下简称“海辰”、“公司”）自成立以来，始终致力于为全球提供安全、高效、清洁、可持续的绿色能源解决方案。随着公司日益的发展，海辰相信，诚实守信、依法合规是公司实现全球商业成功的基石，也是海辰可持续发展的坚实基础。

Xiamen Hithium Energy Storage Technology Co. Ltd., (hereinafter referred to as “Hithium” or the “Company”) has always been committed to providing safe, efficient, clean, and sustainable green energy solutions for the world since its establishment. With the growing development of the Company, Hithium believes that honesty, trustworthiness, and compliance with the law are the cornerstones of the Company's global business success, as well as the solid foundation of Hithium's sustainable development.

公司通过持续完善合规管理体系，优化合规风险管理机制，培育全员合规的文化理念，确保公司的经营管理和员工行为符合法律法规、有约束力行业准则和商业道德的要求。为了更好地帮助每一位海辰人理解和掌握公司的合规要求，并将其与日常经营管理工作相结合，公司制订颁发本行为准则。

The Company ensures that the Company's operation and management as well as the behavior of its employees comply with laws and regulations, binding industry standards and business ethics by continuously improving the compliance management system, optimizing the compliance risk management mechanism, and fostering a culture of compliance among all employees. To better help every person in Hithium understand and master the Company's compliance requirements and combine them with daily operation and management, the Company formulated and issued this Code of Conduct.

作为公司合规管理体系的重要组成部分，本行为准则不仅对包括管理层在内的全体员工的日常工作的方方面面提出了具体的行为要求，明确了商业行为中不得触碰的底线，同时也对商业伙伴等利益相关方提出合规要求。为确保本行为准则得到持续遵守，海辰将不断建立完善合规监督体系，支持所有员工或商业伙伴在遭遇或发现任何不符合本行为准则的行为时向公司报告，并保障所报告的内容有效传达及得到合适的响应。

As an important part of the Company's compliance management system, the Code of Conduct not only puts forward specific behavioral requirements for all employees, including management, in all aspects of their daily work, and clearly defines the bottom line that must not be touched in business behavior, but also puts forward compliance requirements for business partners and other stakeholders. To ensure that the Code of Conduct is continuously complied with, Hithium will continuously establish and improve the compliance monitoring system to support all employees or business partners to report to the Company when they encounter or find any behavior that does not comply with the Code of Conduct, and to ensure that the contents of the report are effectively communicated and receive an appropriate response.

适用范围

Scope of Application

本行为准则适用于厦门海辰储能科技股份有限公司及附属企业全体员工、公司商业伙伴等利益相关方。

This Code of Conduct applies to all employees of Xiamen Hithium Energy Storage Technology Co. Ltd. and its affiliated companies, as well as the Company's business partners and other stakeholders.

咨询与建议

Consultation and Suggestion

公司员工或商业伙伴如果在执行本行为准则过程中有任何疑问、建议，应及时向公司法务与合规中心提出以获取有关的解答与反馈。

If the Company's employees or business partners have any questions or suggestions in the process of implementing this Code of Conduct, please promptly submit them to the Company's Legal and Compliance Center to obtain relevant answers and feedback.

联系邮箱 Contact Email: HC-Compliance@hithium.com

投诉与举报

Complaints and Reports

当公司员工或商业伙伴发现不符合本行为准则要求的情况时，应主动、及时地向公司法务与合规中心进行投诉或举报。

When the Company's employees or business partners discover situations that do not comply with the requirements of this Code of Conduct, they should proactively and promptly file a complaint or report to the Company's Legal and Compliance Center.

所有投诉和举报均可秘密且匿名地提交，公司对所有投诉和举报都会进行认真的调查，其中涉及重大风险的调查将优先启动。调查过程由独立部门开展，确保相关信息全程保密。公司将视情况向实名举报人告知处理进展，并在处理结束后通报调查结果。必要时，公司会采取相应的纠正措施并对责任人员进行追责问责。

All complaints and reports can be submitted confidentially and anonymously. The Company will conduct thorough investigations, prioritizing investigations involving significant risks. The investigation process is conducted by an independent department, ensuring complete confidentiality. The Company will inform the named reporter of the progress of the investigation, as appropriate, and will communicate the results of the investigation upon completion. Where necessary, the Company will take corrective action and hold those responsible accountable.

公司对任何报复行为持零容忍态度，严禁对任何以善意方式提出疑惑、寻求建议、报告不合规行为或在调查中提供信息的公司员工或商业伙伴进行报复的行为。公司每年会根据行为准则培训员工并定期要求员工确认，确保全体员工知情并认可其中内容，提升举报渠道的有效利用。如果您遭遇或发现打击报复的情况，应立即向公司法务与合规中心反映。

The Company has zero tolerance for any retaliation and strictly prohibits retaliation against any employee or business partner who, in good faith, raises concerns, seeks advice, reports non-compliance, or provides information during an investigation. The Company conducts annual employee training on the Code of Conduct and regularly requires employee's confirmation to ensure that all employees are aware of and agree to its content and to promote the effective use of reporting channels. If you experience or discover any retaliation, please immediately report it to the Company's Legal and Compliance Center.

联系邮箱 Contact Email: HC-Compliance@hithium.com

1. 尊重与保护员工

Respect and Protect Employees

1.1 相互尊重的工作环境

A Respectful Work Environment

海辰致力于提供一个安全、公平及尊重的工作环境。公司绝不容忍任何形式的骚扰、歧视及排斥。海辰是一家重视机会平等的公司，所有的就业决定（聘用、晋升、终止聘用等）都是基于合法的商业考虑，如经验、技能、教育、业绩、领导力。

Hithium is committed to providing a safe, fair, and respectful work environment. The Company does not tolerate any form of harassment, discrimination, or exclusion. Hithium is a company that values equal opportunity and all employment decisions (hiring, promotion, termination, etc.) are based on legitimate business considerations such as experience, skills, education, performance, and leadership.

1.2 支持与保障人权

Supporting and Guaranteeing Human Rights

公司尊重所有符合联合国《工商企业与人权指导原则》下国际公认的人权。公司力求以公平和尊重的态度对待受公司业务和供应链影响的每个人。公司承诺尽最大努力识别和处理涉及违反人权相关的风险，对可疑的情况始终保持警惕，并进行合理的尽职调查。

The Company respects all internationally recognized human rights consistent with the United Nations Guiding Principles on Business and Human Rights. The Company seeks to treat everyone affected by its operations and supply chains with fairness and respect. The Company is committed to using its best efforts to identify and address risks associated with human rights violations, to remain alert to suspicious situations, and to exercise reasonable due diligence.

海辰非常重视对员工劳动权益的保护。依据中国和业务所在国适用的法律法规，公司确保在薪资福利、工作时间、结社自由和集团谈判等方面保障员工的基本权利。

Hithium attaches great importance to the protection of employees' labor rights and interests. In accordance with the laws and regulations of China and the jurisdictions where the Company conducts business, the Company ensures that the basic rights of employees are protected in terms of salary and benefits, working hours, freedom of association and group negotiations.

1.3 职业健康与工作场所安全

Occupational Health and Safety in the Workplace

海辰坚持以人为本，安全第一。公司遵守员工健康、工作场所安全的相关法律法规，并通过不断完善职业健康专业化管理，构建职业健康保障机制，持续提升公司的职业健康管理水平。

Hithium insists on people-oriented and putting safety first. The Company complies with the relevant laws and regulations on employee health and workplace safety, and builds an occupational health protection mechanism and continues to improve the company's occupational health management level by continuously improving the specialized management of occupational health.

每位员工应当遵纪守法，规避任何可能危害自身及他人健康的行为，并且当在工作场所内察觉到危险或有害的作业、设备或环境时，应当立即向上级主管或公司有关部门报告。

Each employee shall abide by the law and avoid any behavior that may endanger his/her health or the health of others, and shall immediately report to his/her supervisor or the relevant department of the Company when he/she perceives dangerous or harmful operations, equipment or environment in the workplace.

2. 负责任地经营

Operating Responsibly

2.1 与政府合作

Cooperation with the Government

公司以公平、诚实地态度对待政府机构。公司承诺在与政府合作时，遵守所有适用于公司的合同条款和条件、法律和法规。

The Company treats government agencies fairly and honestly. The Company is committed to complying with all contractual terms and conditions, laws and regulations applicable to the Company when working with the government.

公司员工就政府实体是已知最终用户的合同进行谈判，或与政府雇员就潜在的政府合同进行接触时，应及时向公司反馈。

The Company's employees shall provide timely feedback to the Company when negotiating contracts in which government entities are known end users, or engaging with government's employees regarding potential government contracts.

2.2 公平竞争

Fair Competition

公司主张自由竞争的市场，反对限制市场竞争的做法，杜绝串通投标、虚假宣传以及侵犯商业秘密等任何扰乱市场竞争秩序、损害其他经营者或消费者合法权益的行为。

The Company advocates a free competitive market, opposes practices that restrict market competition, and eliminates any behavior that harasses the order of market competition and harms the legitimate rights and interests of other operators or consumers, such as collusive bidding, false advertising, and infringement of trade secrets.

公司应与公司的客户、供应商、竞争对手进行公平交易，不应通过操纵、隐瞒、滥用特权信息、歪曲重要事实或任何其他不公平交易或行为，取得不公平优势。

The Company shall deal fairly with the Company's customers, suppliers, and competitors, and shall not obtain an unfair advantage through manipulation, concealment, misuse of privileged information, misrepresentation of material facts, or any other unfair dealings or behaviors.

2.3 反对垄断行为

Anti-Monopoly

公司遵守所有适用的反垄断相关法律法规。公司不会与其他公司达成不正当的协议，以提供给客户固定价格或条款、分配市场或客户、或操纵投标过程。

The Company complies with all applicable antitrust laws and regulations. The Company will not enter into improper agreements with other companies to fix prices or terms offered to customers, allocate markets or customers, or manipulate the bidding process.

公司员工在与商业合作伙伴或其他第三方接触时，都负有遵守反垄断相关法律法规的义务，警惕与识别潜在的反垄断合规风险。

Employees of the Company should comply with antitrust laws and regulations when engaging with business partners or other third parties, and be alert to and recognize potential antitrust compliance risks.

2.4 防止贿赂与腐败

Anti-Bribery and Anti-Corruption

违反反腐败法律法规可能触发对公司和所涉个人的调查，并导致其名誉受损甚至受到刑事处罚。公司绝不允许任何形式的行贿、受贿或腐败行为发生，包括给予或接受任何形式的贿赂、回扣或疏通费。

Violations of anti-corruption laws and regulations can trigger investigations for the Company and the individuals involved, and lead to reputational damage and even criminal penalties. The Company does not tolerate bribery or corruption of any kind, including the giving or receiving of bribes, kickbacks, or facilitation payments of any kind.

公司员工应遵守有关防止行贿、受贿和腐败行为的公司内部规定。在与各国政府机构打交道时，员工不得为获取订单或利益而向官员贿赂金钱或给予任何形式的好处。如果官员主动要求个人好处，在任何情况下均不得同意，且必须马上向公司报告有关情况。

The Company's employees shall comply with internal company regulations regarding the prevention of bribery, corruption and other corrupt practices. When dealing with government agencies in various countries, employees shall not bribe officials with money or giving advantages of any kind to obtain orders or benefits. If an official actively requests personal benefits, it must not be agreed under any circumstances and the situation must be reported to the Company immediately.

2.5 谨慎对待礼品与招待

Being Cautious with Gifts and Hospitality

海辰始终坚持以客户为中心，响应客户需求，关注客户体验，为客户创造更高价值。公司员工应谨慎对待向客户赠送礼品、宴请招待客户。赠送礼品、宴请招待应在符合法律和公司规定并在通常的商业交往惯例范围内开展。原则上员工均不得向客户赠送贵重礼品、安排昂贵宴请招待。

Hithium always adheres to customer-centricity, responds to customer needs, pays attention to customer experience, and create higher value for customers. Employees of the Company should be cautious with giving gifts to customers and entertaining customers. Gifts and entertainment should be provided in accordance with laws and the Company's regulations, and within the scope of standard business practices. In principle, employees are not allowed to give valuable gifts or arrange expensive entertainment for customers.

2.6 环境保护

Environmental Protection

可持续发展是海辰的重要理念之一。海辰致力于在产品 and 原材料研发、生产、储存、运输及使用中预防或持续减少对环境的影响。同时，海辰在建造、运营、改建或扩建生产工厂时，也适用同样的原则，避免任何违法的物质排放。

Sustainable development is one of the key concepts of Hithium. Hithium is committed to preventing or continuously reducing the environmental impact in the development,

production, storage, transportation, and use of products and raw materials. At the same time, Hithium applies the same principles when building, operating, renovating, or expanding production plants and avoid any illegal emissions of substances.

公司鼓励员工在工作和生活中履行环境保护义务和责任，积极践行低碳生活理念。

The Company encourages its employees to fulfill their environmental protection obligations and responsibilities in their work and life, and actively practice the concept of low-carbon living.

3. 践行良好商业合规

Practicing Good Business Compliance

3.1 遵守反洗钱要求

Anti-Money Laundering

洗钱是一种将非法所得合法化的犯罪行为。公司严格遵守国内外有关反洗钱的适用法律及法规，绝不参与任何洗钱活动。公司只会选择与拥有良好商业信誉、资金来源合法的客户开展业务。

Money laundering is a criminal act that legalizes illegal gains. The Company strictly abides by applicable domestic and international laws and regulations on anti-money laundering and will never participate in any money laundering activities. The Company will only choose to conduct business with customers who have good business reputations and legitimate sources of funds.

任何员工不得使用公司的产品与任何人通过商业活动作违法用途，例如清洗来自非法途径的资金；在业务开展过程中应重点关注使用大额现金支付的客户或其他商业伙伴。一旦发现涉及任何可疑金融交易或活动，应当立即向公司反映。

No employee shall use the Company's products to engage in illegal activities with anyone in the conduct of business activities, such as laundering funds from illegal sources; in the course of business, focus should be placed on customers or other business partners who use large amounts of cash payments. Once any suspicious

financial transactions and activities are detected, they should be immediately reported to the Company.

3.2 确保财税诚信

Ensuring Fiscal and Tax Integrity

公司应遵守适用于公司的会计惯例和财务报告的要求，准备及时、准确和完整的财务信息，以向管理层、投资者、监管者和其他利益相关者提供报告。公司遵守业务所在国家和地区税务法律法规，依法履行纳税义务和税收代扣代缴义务。

The Company shall comply with accounting practices and financial reporting requirements applicable to the Company and prepare timely, accurate, and complete financial information for reporting to management, investors, regulators, and other stakeholders. The Company shall comply with the tax laws and regulations of the countries and regions in which it operates and fulfill its tax obligations and tax withholding obligations under the laws.

公司通过制定和实施财务审计制度和内部控制程序，防范财务造假和舞弊行为。

The Company develops and implements financial audit systems and internal control procedures to prevent financial fraud and malpractice.

3.3 国际贸易合规

International Trade Compliance

作为一家开展国际业务的公司，海辰遵守全球贸易管制和经济制裁相关的适用法规。公司致力于提高供应链的安全管理水准，认真确保在业务活动中检查、执行和遵守适用的海关和贸易法规。

As a company with international operations, Hithium complies with applicable regulations of global trade controls and economic sanctions. The Company is committed to improving the level of security management in the supply chain and carefully ensures that applicable customs and trade regulations are checked, enforced, and complied with in its business activities.

公司负责进出口货物、技术的员工，有义务在工作中遵守现行制裁计划、出口管制和海关法律法规，以及相关指导准则和流程。

Employees of the Company who are responsible for importing or exporting goods or technologies are obliged to comply with the current sanctions programs, export control and customs laws and regulations, as well as with the relevant guidelines and processes in their work.

3.4 负责任的采购活动

Responsible Procurement Activities

为了践行负责任的采购活动，在采购物料、产品和服务时，公司会要求供应商遵守有关人权和劳动保护、卫生安全、环境保护、出口管制、信息安全等相关法律法规和商业道德。

In order to implement responsible procurement activities, during the procurement of materials, products and services, the Company will require suppliers to comply with relevant laws, regulations and commercial ethics of human rights and labor protection, hygiene and security, environmental protection, export control, information security, etc.

公司将不断完善与认真贯彻供应商管理相关制度，优化供应商准入与考核机制，确保所采购的物料、设备等能够有效符合海辰的要求。

The Company will continuously improve and conscientiously implement the relevant system of supplier management, optimize the supplier's access and assessment mechanism, and ensure that the purchased materials, equipment, etc. can effectively meet the requirements of Hithium.

3.5 保证产品安全性和质量

Guarantee of Product Safety and Quality

海辰的产品质量是公司声誉的关键部分，也是公司竞争力的基础。在海辰提供产品的国家或地区，海辰均遵守与公司产品质量、安全、性能有关的适用的法律法规。公司将安

全合规纳入产品监管生命周期，通过设立质量管理体系，确保公司能持续提供符合相关方要求的产品和服务。

Hithium's product quality is the key part of the Company's reputation and the foundation of the Company's competitiveness. In the countries or regions where Hithium's products are provided, Hithium complies with applicable laws and regulations related to the quality, safety and performance of the Company's products. The Company integrates safety compliance into the product regulatory life cycle and establishes a quality management system to ensure that the Company can continue to provide products and services that meet the requirements of relevant parties.

4. 维护公司合法利益

Safeguarding the Legitimate Interests of the Company

4.1 避免利益冲突

Avoidance of Conflict of Interest

利益冲突会影响公司的公信力，并可能使公司面临各种风险，以及损害公司的声誉。为有效避免利益冲突，海辰要求每一位员工在其个人利益可能影响、或被认为可能影响其职业判断与公司利益时，有义务立即向公司进行正式申报和报备，并确保公司始终以公司的最佳利益行事。公司鼓励开放沟通，并对主动申报的行为予以肯定。在涉及以下方面，公司任何一位员工均：

Conflicts of interest will affect the credibility of the Company and may expose the Company to various risks, as well as damage the Company's reputation. To effectively avoid conflicts of interest, Hithium requires every employee to immediately and formally report to the Company when their personal interests may affect, or be perceived to affect, their professional judgment or the interests of the Company, and to ensure that the Company always acts in its best interests. The Company encourages open communication and commends proactive reporting. In the following respects, any employee of the Company shall:

4.1.1 不得接受海辰的任何商业合作伙伴、供应商、其他合作方或潜在第三方的金钱或其他不当利益；

Not accept monetary or other improper benefits from any of Hithium's business partners, suppliers, other partners or potential third parties;

4.1.2 不得在任何正在合作或潜在的海辰商业合作伙伴或供应商的第三方任职；

Not work for any third party who is a current or potential business partner or supplier of Hithium;

4.1.3 不得与家庭成员或有重大个人关系的其他人开展公司的业务，不得利用在海辰的职位为他们获得优惠待遇；

Not conduct the business of the Company with family members or other people with whom you have a significant personal relationship, and not use the position at Hithium to obtain preferential treatment for them;

4.1.4 不得将通过使用公司财产、信息或职位发现的机会据为己有，不得利用公司财产、信息或职位谋取个人利益。

Not take possession of the opportunities discovered by using the Company's property, information or position, and not seek personal benefits by using the Company's property, information or position.

4.2 管理与保护公司品牌

Management and Protection of the Company Brand

公司品牌是公司业务不可分割的一部分，也是海辰重要的企业资产。全体员工应遵守公司有关品牌和宣传的规章制度，妥善管理和保护公司品牌，不得从事有损公司品牌形象的行为。员工只有在获取公司授权委托应对媒体时，才能代表公司和媒体联系。

The company brand is an integral part of the Company's business and an important corporate asset of Hithium. All employees shall abide by the Company's rules and regulations on brand and publicity, properly manage and protect the Company's brand,

and shall not do any behavior that damages the Company's brand image. Employees can only contact the media on behalf of the Company if they are authorized by the Company to deal with the media.

4.3 妥善保管与合理利用公司财产

Proper Storage and Reasonable Utilization of the Company Property

公司员工应当妥善保管和合理利用公司财产，包括房地产、设备、库存、产品、办公设施等有形资产，以及商业秘密、专有技术、品牌、计算机系统等无形资产，杜绝一切窃取、不当利用等任何有损公司资产价值的行为。

Employees of the Company shall properly keep and rationally use the Company's property, including tangible assets such as real estate, equipment, inventory, products and office facilities, as well as intangible assets such as trade secrets, proprietary technologies, brands and computer systems, and eliminate any theft, improper use, or other acts that damage the value of the Company's assets.

4.4 尊重与保护知识产权

Respect and Protection of the Intellectual Property

海辰的知识产权是公司业务取得成功的关键。公司尊重和保护知识产权，鼓励并坚持技术创新，注重发挥专利、商标等知识产权的引领和重要作用，将知识产权管理与科技研发、资产运作结合起来，持续提升企业核心竞争力。

Hithium's intellectual property is key to the success of the Company's business. The Company respects and protects intellectual property rights, encourages and adheres to technological innovation, pays attention to the leading and important role of intellectual property rights such as patents and trademarks, combines intellectual property management with technology R&D and asset operation, and continuously improves the core competitiveness of enterprise.

公司认可并尊重竞争对手和业务合作伙伴的知识产权，除非权利人或法律明确允许，否则公司不会使用其知识产权。

The Company recognizes and respects the intellectual property rights of its competitors and business partners, and does not use their intellectual property rights unless expressly permitted by the right holders or laws.

4.5 保守商业秘密

Preservation of Trade Secrets

每位员工都有义务保守商业秘密。这些商业秘密涉及公司的各个方面，比如公司组织架构、与业务、生产、研发相关的事宜以及公司数据等。

Every employee is obliged to keep trade secrets. These trade secrets involve various aspects of the Company, such as the Company's organizational structure, matters related to business, production, research and development, as well as company data, etc.

4.6 数据和个人信息安全

Data and Personal Information Security

数据和个人信息安全是公司的合规管理工作中重要的一部分，公司治理与构建持续改进的信息安全防护体系，确保所有数据处理活动合法合规，并受到充分保护。公司应确保仅在满足特定明确目的前提下处理个人信息（包括但不限于员工、客户和供应商的个人信息），并且必须遵守个人信息保护适用的法律法规。

Data and personal information security is an important part of the Company's compliance management. The Company governs and establishes a continuously improved information security protection system, and ensure that all data processing activities are legal, compliant, and adequately protected. The Company shall ensure that personal data (including, but not limited to, personal information of employees, customers and suppliers) is processed only for specific and explicit purposes and must comply with applicable laws and regulations for the protection of personal data.

通过制定实施公司数据安全保护制度、部署加密与防火墙等有效的技术安全措施、定期开展漏洞扫描配合应急响应机制，公司积极监控和应对威胁，防止数据被任何未经授权

的当事方披露、更改或销毁。同时，公司要求供应商、承包商等第三方遵守同等信息安全要求，通过协议约束与义务告知，确保其信息处理行为符合海辰标准。

By developing and implementing a corporate data security protection system, deploying effective technical security measures such as encryption and firewalls, conducting regular vulnerability scans and coordinating emergency response mechanisms, the Company actively monitors and responds to threats, and prevents data from being disclosed, altered, or destroyed by any unauthorized parties. At the same time, the Company requires suppliers, contractors, and other third parties to comply with the same information security requirements. Through binding agreements and notifications on obligations, the Company ensures that their information processing practices adhere to the standards of Hithium.

每位员工应当以负责任和安全地方式对待公司数据和个人信息，并了解可能存在的威胁和风险。如果发生疑似数据或个人信息泄露或不确定如何自行处理的情况，应及时向公司报告。

Each employee should treat company data and personal information in a responsible and secure manner, and be aware of possible threats and risks. In case of suspected data or personal information security leakage or uncertainty about how to handle the situation, please report to the Company in a timely manner.