



国轩高科  
GOTION HIGH-TECH

Gotion  
Business Partners

国轩高科

商业伙伴行为准则

Code of Conduct

方圆于心 ■ 合规于行  
Compliance Everywhere by Everyone

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本准则阐述了国轩高科股份有限公司，（以下简称“国轩高科”）对其商业伙伴，特别是供应商，在商业活动中思维和行为方式的期望。这些要求是国轩高科与商业伙伴建立合作关系的基础。

The code of conduct defines the expectations of Gotion High-Tech. Co., Ltd. (hereinafter referred to as “Gotion”), regarding the mindset and conduct of business partners in their business activities, in particular with reference to suppliers. The requirements are considered as the basis for building partnerships between Gotion and its business partners.

本准则要求是基于国内外法律法规和公认的标准制定的，如联合国（UN）全球契约的十项原则、联合国商业与人权指导原则以及国际劳工组织（ILO）公约以及中华人民共和国相关法律法规。

The requirements of this code are based on domestic and international laws and regulations and recognized standards, such as 10 Principles of the United Nations (UN) Global Compact, the United Nations Guiding Principles on Business and Human Rights, the Conventions of the International Labor Organization (ILO) and relevant laws and regulations of the People's Republic of China.

此外，这些要求还基于国轩高科的内部标准和价值观制定。如国轩高科对于反腐的宣言、环境保护政策、员工行为准则等。

In addition, the sustainability requirements are also based on internal standards and values, such as the declaration on anti-corruption, environment protection policies, code of conduct for employees, etc.



## 目的和动机

### Purpose and Motivation

国轩高科始终坚持将合规、诚信、透明和公开的原则作为业务经营的基础以及建立信誉和信任的关键因素。我们高度重视在商业实践中贯彻相关法律，内部制度和企业价值观，并向员工明确宣贯这些规则和原则。我们希望商业伙伴可以遵守这些要求，并向自己的雇员和商业伙伴传达这些原则和责任。

Gotion believes the principles of compliance, integrity, transparency and fairness are the foundation of business as well as the key to establish the credibility and trust in practice. We set particularly great store by implementing its legal framework, policy, guidelines and corporate values in business operation and communicate clearly to employees. We expect the business partners of Gotion to abide by these requirements and convey these principles and the obligations to their own employees as well as to their business partners.



## 合作

### Cooperation

商业伙伴在国轩高科取得成功的过程中扮演着至关重要的角色。合作让我们互惠互利、共同进步。因此，国轩高科高度重视与商业伙伴的紧密合作。

通过践行可持续发展之要求，国轩高科意识到自身的行为会对经济、生态和社会发展产生影响，也应当对此负有责任。因此，国轩高科希望商业伙伴能够意识到自己肩负的责任，尤其是在人权、环境保护和打击腐败等这些普遍重点关注的领域。

The business partners play an integral part in the business success of Gotion. Partnership enables us to achieve mutual benefit and make common progress. Therefore, Gotion is focusing on close cooperation with its business partners.

Applying the sustainability requirements, Gotion is aware of its responsibility for the economic, ecological and social impact of its actions. Gotion expects its business partners also address the responsibility they are shouldering particularly in terms of human rights, environmental protection and combatting corruption, etc. which are commonly concerned.

## 适用范围

### Scope of Application

以下要求适用国轩高科及其商业伙伴之间的所有业务关系。并且，国轩高科的商业伙伴必须采取适当措施，确保他们自身的合作伙伴和供应链符合这些要求。

The following requirements apply to all business relations between Gotion and its business partners. Furthermore, business partners must take appropriate steps to ensure compliance with these requirements by their own business partners and along the supply chain.



### 劳工

### Labor

国轩高科的商业伙伴必须尊重和维护国际公认的各项人权，绝不参与任何漠视与践踏人权的行。此规定适用于所有工人，包括临时工、外籍劳工、学徒、合同工、直接雇员和任何其他类型的工人。

The business partners of Gotion must respect and uphold all internationally recognized human rights, and never engage in any behavior that ignores and violates human rights. This rule applies to all workers, including temporary workers, foreign workers, apprentices, contract workers, direct employees and any other type of workers.

#### 自愿劳工

#### Voluntary labor

商业伙伴必须采取适当和合理的措施，在自己的企业和/或供应链上防止债役、强迫劳动、强制劳动和所有形式的现代奴隶制和人口贩运。商业伙伴应确保雇佣关系是自愿的，员工可以按照自己的意愿并在合理的通知下终止雇佣关系。同时，不得扣留或以其他方式损坏、隐匿、没收员工的由政府颁发的身份证件（如居民身份证、护照等），以及限制工人的行动自由或要求工人在没有商业理由的情况下非自愿地居住公司提供的住宿。

The business partners must take appropriate and reasonable measures to prevent debt bondage, forced labor and all forms of modern slavery and human trafficking in their own businesses and/or supply chains. Business partners should ensure that the employment relationship is voluntary and employees can terminate the employment relationship at their own will and with reasonable notice. At the same time, the government-issued identification documents of employees (such as resident identification cards, passports, etc.) shall not be withheld or otherwise damaged, concealed, or confiscated. And the workers' freedom of movement shall not be restricted or will not be required to involuntarily reside in company-provided accommodation without business justification.

#### 童工和保护未成年工

#### Child labor and protection of underage workers

商业伙伴应根据适用的法律和国际劳工组织的标准确认雇佣人员的最低就业年龄，消除并禁止雇佣童工的现象。同时，确保雇佣的未成年工符合适用的法律法规，并明确岗位职责以及对未成年工进行职业安全教育培训。

The business partners should confirm the minimum age for employment in accordance with applicable laws and International Labor Organization standards, to eliminate and prohibit the employment of child labor. At the same time, ensure the employment of underage workers complies with applicable laws and regulations, clarify job responsibilities and provide vocational safety training for the underage workers.

## 人道待遇

### Humane treatment

商业伙伴不得对工人实施骚扰、虐待、体罚、精神或肉体胁迫或言语侮辱等非人道行为，亦不得威胁要实施任何此类行为。

The business partners shall not engage in inhumane acts of harassment, abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers, or threaten to commit any such acts.

## 自由结社

### Freedom of association

商业伙伴应尊重所有工人自愿组建和加入工会、进行集体谈判与和平集会以及拒绝参加此等活动的权利。工人和/或其代表应能与管理层公开交流沟通并表达看法，而无需担心会受到报复。

The business partners shall respect the rights of all workers to form and join unions voluntarily, to engage in collective bargaining and peaceful assembly, and to refuse participate in such activities, subject to local regulations. Workers and/or their representatives shall be able to communicate openly and express views without worrying about retaliation.

## 不歧视

### Non-discrimination

商业伙伴不得因民族、种族、性别、宗教信仰不同而歧视工人。不应强迫工人或准工人接受可能带有歧视性目的的医学检查或体检。

The business partners shall not discriminate against workers on the basis of national, racial, gender or religious belief. Workers or prospective workers should not be forced to undergo medical examination or physical examination that may have discriminatory purposes.





## 工作时间

### Working hours

商业伙伴应确保其工作时间符合所在地国家法律和/或各自经济部门现行的法律法规要求。

The business partners shall ensure their working hours comply with the local laws and/or the laws and regulations that are currently in force in respective economic sectors.

## 工资和福利

### Salary and benefits

商业伙伴应向其员工支付合理的工资，至少适用法律规定的最低工资标准，并根据就业所在地的法律进行计量。这一工资至少应尽可能满足员工的基本需求，并使员工及其家人享有当地适宜的生活水平。商业合作伙伴必须直接、足额、按时地向员工支付工资。

The business partners shall pay their employees reasonable wage, at least reaching the minimum standard required by applicable law, and measure in accordance with the laws of the place of employment. The wage should at least meet the basic needs of the employee as far as possible and enable the employee and his or her family to reach an adequate standard of living in the place of employment. The business partners must pay their employees wages directly, in full and on time.

## 健康与安全

### Health and Safety

商业伙伴应确保向工人提供安全 and 卫生的工作环境、生活场所，并确保所有工人接受以母语或其可以理解的语言开展的健康安全方面的培训或相关信息，使其正确认知其所接触的工作场所危险标识语。

The business partners should ensure the provision of a safe and hygienic working environment and living quarters to the workers. Additionally, they must ensure that all workers receive health and safety training or relevant information delivered in the workers' native language or a language that the workers can understand to properly recognize the hazard signs in the workplace.

#### 职业卫生及生产安全

##### Occupational Health and Production Safety

商业伙伴应通过正确的设计、引导和管理来识别、评估和控制工人可能遇到的安全风险（如化学、电器和其他能源、火灾、车辆及坠落危险）。相关单位应为工人配备符合安全生产要求的个人防护用品及提供有关上述风险的培训，应对劳动防护用品发放及使用的执行情况进行跟踪管理，确保工人职业卫生及生产安全。



The business partners shall identify, evaluate and control safety risks (such as chemical, electrical and other hazards from energy, fire, vehicle and falling down) that workers may encounter through proper design, engineering and management. Relevant business units should equip workers with personal protective equipment that meets production safety requirements and provide trainings on the mentioned risks. They should track and manage the distribution and use of labor protection equipment to ensure workers' occupational health and production safety.

#### 应急准备

##### Emergency preparedness

商业伙伴应识别并评估潜在的紧急情形和紧急事件，并通过实施应急预案及响应程序将其影响降到最低，包括紧急报告、工人通知和撤离程序、工人训练与演习、适当的火灾探测及扑灭设备、明显和畅通的逃生通道、充足的出口设施等。最低程度地降低对生命、环境和财产的损害。

The business partners shall identify and assess potential emergency situations and emergencies and minimize their impact by implementing emergency plans and response procedures, including emergency reporting, worker notification and evacuation procedures, worker training and drills, and appropriate fire detection and suppression equipment, obvious and clear escape routes, adequate exit facilities, etc. To minimize the damage to life, environment and property.



## 工伤和疾病

### Work injury and illness

商业伙伴应制定程序以预防、管理、跟踪和报告工伤和疾病，包括以下规定：鼓励工人报告；对工伤和疾病案例进行分类和记录；提供必要的医疗服务；调查案例并采取纠正措施以消除其事故源头；帮助工人重返工作。

The business partners shall have procedures in place to prevent, manage, track and report work-related injuries and illnesses, including provisions for: encouraging worker reporting; classifying and recording work-related injury and illness cases; providing necessary medical care; investigating cases and taking corrective action to eliminate the source of the accident and help workers return to work.

## 人体工程

### Ergonomic

商业伙伴应识别、评估和控制工人从事强体力型工作给工人带来的影响，包括人工搬运/装卸材料和重复搬举重物、长时间站立以及高度重复或强力的装配工作。

The business partners shall identify, assess, and control the impact of workers performing physically demanding tasks, including manual handling/loading and unloading of materials and repetitive heavy lifting, prolonged standing, and highly repetitive or strong assembly work.

## 机器安全防护

### Machine safety protection



商业伙伴应对生产机械和其他机械进行安全评估，并对可能会对工人造成伤害的机械，设置物理防护装置、联锁装置等，并定期维护。

The business partners shall carry out safety evaluation to the production machinery and others, install physical protection devices, interlocking devices on the machinery that may cause harm to workers, and maintain them regularly.

## 公共卫生、饮食和住宿

### Public health, food and accommodation

商业伙伴应提供干净的洗手间、饮用水和卫生的食品配制、存储和用餐设施。商业伙伴或劳工代理机构提供的工人宿舍应保持洁净安全，并提供适当的紧急出口、洗浴热水、充足的光热和通风、用于存放个人和贵重物品的独立安全柜，以及合理的私人空间。

The business partners shall provide clean restrooms, drinking water and sanitary food preparation, storage and dining facilities. Worker dormitories provided by business partners or labor agencies shall be kept clean and safe with adequate emergency exits, hot water for bathing, adequate light, heat and ventilation, separate safety cabinets for personal and valuables storage, and reasonable private space.

## 环境保护

### Environment Protection



国轩高科立志于承担环境责任。国轩高科的商业伙伴在生产经营中，应尽量减少对社区、环境和自然资源的不利影响，同时保护公众的健康和安全。

Gotion is determined to undertake environmental responsibility. The business partners of Gotion shall minimize adverse impacts on communities and environment, protect the health and safety of the public.

#### 环境许可与报告

##### Environmental permits

商业伙伴应取得、维护并更新所有必需的环境许可证、批准文书和登记证，并且遵循其操作和报告要求。商业伙伴建设用地应当符合国土空间规划、土地利用年度计划和用途管制以及节约资源、保护生态环境的要求，并严格执行建设用地标准，不得在国土空间规划确定的禁止开垦的范围内从事土地开发活动。

The business partners shall obtain, maintain and update all required environmental permits, approvals and registrations, and comply with the corresponding operation and reporting requirements. The construction land of business partners shall comply with the national land space planning, annual land use plan and use control, as well as the requirements of saving resources and protecting the ecological environment, and strictly implement the construction land standards. Land construction activities shall not be carried out within the scope of the prohibited areas of reclamation defined by the national land space planning.



## 预防污染和节约资源

### Prevent pollution and resource saving

商业伙伴应采取措施从源头上消除或减少污染物的产生、排放。在从事生产经营活动，应当采取有效措施，防止、减少土壤污染，识别、管理各类噪声源（如生产设备、运输车辆等），采取噪声源头控制（如选用低噪声设备、优化工艺流程等），合理布局噪声源，利用隔声、吸声、消声、减振等措施，减少振动、降低噪声对周边社区居民及环境的影响，对所造成的相关污染依法承担责任。应采取措施有节制地使用自然资源，包括水、化石燃料、矿产和原始森林木材等。

The business partners shall take measures to reduce or eliminate the generation and emission of pollutants. Effective steps should be taken in the production and business operation to prevent and reduce soil pollution, identify and manage various noise sources (such as from production equipment, transportation vehicles, etc.). Adopting noise source control measures (such as selecting low-noise equipment, optimizing process flow, etc.) and reasonably arranging noise sources, using sound insulation, sound absorption, noise reduction, vibration reduction and other measures to reduce vibration and the influence of noise to residents in surrounding community and environment, and bearing legal responsibility for the pollution caused. Furthermore, measures should be taken to use natural resources in a restrained manner, including water, fossil fuels, minerals and timber from virgin forest.

## 有害物质管控

### Hazardous substance control

商业伙伴应识别、标记和管理会对人类或环境造成危险的化学品及其他材料，确保其得到安全处理、移动、储存、使用、回收及再利用。

The business partners shall identify, label and manage chemicals and other materials that pose a hazard to humans or the environment, ensuring that they are handled, moved, stored, used, recycled and reused safely.



## 固体废弃物

### Solid waste

商业伙伴应采用系统方法识别、管理、减少、负责任地处置或回收固体废弃物（无害废弃物）。

The business partners shall take a systematic approach to identify, manage, reduce, responsibly dispose of or recycle solid waste (non-hazardous waste).

## 材料限制

### Material restrictions

商业伙伴应遵守有关在产品中以及制造过程中禁用或限用某些特定物质（包括回收和处置标志）的相关法律、法规和客户要求。

The business partners shall comply with relevant laws, regulations and customer requirements on prohibition or restriction of certain specific substances (including recycling and disposal marks) during manufacturing process.



## 废气排放

### Waste gas emissions

商业伙伴应识别、管理、并减少对于生产经营过程中产生的对环境有害的废气排放。在排放之前应按要求进行分类、监测、控制和处理。

The business partners shall identify, manage, and reduce waste gas emissions. Classification, monitoring, control and disposal shall be carried out as required prior to discharge.



## 水资源管理

### Water resource management

商业伙伴应实施水管理计划，以记录、分类和监测水资源及其使用和排放情况，寻求保护水资源以及控制污染渠道。所有废水在排放或处置前，需按要求对其进行分类、监测、控制和处理。

The business partners shall implement a water management program to document, classify and monitor water use and discharge, seek to protect water resources and control pollution channels. All wastewater shall be classified, monitored, controlled and treated as required prior to discharge or disposal.

## 能源消耗和温室气体排放

### Energy consumption and greenhouse gas emissions

商业伙伴应跟踪和记录能源消耗以及所有相关温室气体的排放情况。商业伙伴应探索开发有成本效益的方法以提高能源效率，最大程度地减少能源消耗与温室气体排放。

The business partners shall track and record energy consumption and all relevant greenhouse gas emissions, and develop cost-effective ways to improve energy efficiency and minimize energy consumption and greenhouse gas emissions.

## 生物多样性

### Biodiversity

商业伙伴应遵守生物多样性保护相关法规，减少运营、服务和产品对生物多样性、植物安全等方面的负面影响（包括但不限于对栖息地、野生动物、植物群和生态系统的破坏），应不支持任何对生物多样性有危害的活动，例如不售卖捕猎野生动物的工具，不进行野生动物交易，同时支持倡导宣传生物多样性保护。

The business partners shall comply with relevant laws and regulations on biodiversity conservation, reduce the negative impacts from business operations, services and products on biodiversity, plant safety, etc. (including but not limited to the damage to habitats, wildlife, flora and ecosystems), and should not support any activities that are harmful to biodiversity, such as not selling tools for hunting wildlife and not engaging in wildlife trade. At the same time, they should support the advocacy of biodiversity conservation.



## 管理体系

### Management System



国轩高科的商业伙伴应适时实施或维护相应的管理体系，以促进对本准则及法律规定的遵循、识别和降低相关营运风险，以及促进持续改进。

The business partners of Gotion shall implement or maintain appropriate management systems as appropriate to facilitate compliance with this code and legal requirements, identify and mitigate risks, and promote continuous improvement.

#### 公司声明

#### Company statement

商业伙伴应编制公司声明，证明其高标准履行社会和环境职责、道德操守和持续改善的承诺。商业伙伴应以当地官方语言编写该声明，并将其张贴在工厂内。

The business partners shall prepare a company statement demonstrating their commitment to high standards of social and environmental responsibility, ethical conduct and continuous improvement. The business partners shall prepare this statement in the local official language and post it in the factory.

## 管理问责与责任

### Management accountability and responsibility

商业伙伴应指定一名全职人员作为负责人，监督并落实应履行的社会、健康与安全以及环保责任。应定期查看国轩高科官网，了解确认本《准则》最新版本的内容，同时，积极参与国轩高科组织的相关培训和沟通，加强对本《准则》中相关要求的理解并在内部进行沟通。

The business partners shall nominate a full-time employee as the responsible person to supervise and implement the social, health, safety and environmental responsibilities. This person should check the official website of Gotion regularly to understand and confirm the content of the latest version of this code. At the same time, the business partners should actively participate in relevant training and communication organized by Gotion to deepen the understanding of the relevant requirements in this code and make communication internally.

## 定期评估

### Periodic assessment

商业伙伴应定期评估自身及其分包商和下级商业伙伴的设施和运营情况，以确保遵守适用的法律法规及准则与标准。评估应至少每年进行一次。

The business partners shall regularly evaluate their own facilities and their subcontractors and sub-suppliers, to ensure compliance with applicable laws and regulations. Evaluations should be conducted at least annually.





## 纠正措施计划

### Corrective action plan

对于通过内部和外部审核和评估、申诉报告、工人及利益相关者反馈、事故调查和其他方式发现的违规或不合格行为，商业伙伴应及时实施纠正流程。

The business partners shall implement a timely corrective action for violations identified through internal and external audits, grievance reports, worker and stakeholder feedback, incident investigations and other means.

## 培训和沟通

### Training and communication

商业伙伴应向其全体员工有效沟通其社会和环境公司声明。除遵守《商业伙伴行为准则》外，培训或沟通还应包括但不限于工人的权利和福利以及内部政策和程序，应在入职培训期间进行培训或沟通，并每年通过再培训巩固知识。

商业伙伴应建立流程，向下级商业伙伴和客户清晰、准确地传达其社会责任绩效、实践、政策和期望等相关信息的流程。



The business partners shall communicate their social and environmental statements to all employees. In addition to compliance with this Code of Conduct For Business Partners, training or communication should include but not be limited to workers' rights, benefits and internal policies and procedures. The business partners shall conduct training or communication during induction and consolidate knowledge through retraining each year.

The business partners shall establish processes to clearly and accurately cascade their social responsibility performance, practices, policies and expectations to sub-suppliers and customers.

## 文档和记录

### Documentation and records

商业伙伴应创建并维护文件和记录，确保遵循法规并符合公司的要求及符合隐私保护的相关保密条款。

The business partners shall create and maintain documents and records to ensure compliance with the requirements and compliance with the confidentiality provisions for privacy protection.

## 负责任的原料采购

### Responsible Sourcing of Raw Materials



国轩高科秉承负责任采购的理念，不支持、不采购“冲突矿产”。国轩高科的商业伙伴应确保其采购的原材料没有来自刚果（金）及其周边的冲突地区。

Gotion adheres to the concept of responsible procurement and does not support or purchase "conflict minerals". The business partners should ensure that the raw materials do not come from conflict areas in and around the Democratic Republic of the Congo.

#### 商业伙伴尽职调查

##### Business partner due diligence

商业伙伴应制定尽职调查政策和管理制度，以识别相关的风险并采取适当的措施缓解此类风险。商业伙伴应针对材料采购、加工及交易相关层级开展尽职调查，以判断相关材料是否来自高风险地区，其中包括存在以下活动或情况的区域：冲突、最恶劣形式的童工雇佣现象、强迫劳动和贩卖人口、严重侵犯人权的行为。

The business partners shall establish due diligence procedures to identify risks and take appropriate measures. They shall conduct due diligence for material procurement, processing and transaction related levels to determine whether the material is sourced from high-risk areas, which includes: conflict, worst forms of child labor, forced labor and human trafficking, gross violations of human rights.

## 风险预防 and 解决

### Risk prevention and resolution

商业伙伴应采取适当合理的手段，以确保已识别的风险及其解决情况告知客户方，或采取其他沟通和解决措施。

The business partners shall take appropriate and reasonable measures to ensure that the identified risks and their resolution are notified to the customer, or take other communication and resolution measures.

### 针对供应链尽职调查的第三方验证或审核

#### Third-party verification or audit for supply chain due diligence

使用和/或采购相关矿物的商业伙伴应通过认可的第三方组织对“负责任的采购”尽职调查活动进行验证或审核。如果发现与锡、钽、钨、金、钴或其他指定相关矿物或相关材料有关的任何警告风险，商业伙伴应立即以书面形式通知国轩高科。

The business partners should have their Responsible Sourcing due diligence activities which are conducted by third party for verification or audit when using and/or sourcing relevant minerals. Gotion shall be immediately notified if any risk is found related to tin, tantalum, tungsten, gold, cobalt or other specified related minerals or related materials.





## 透明的商业合作关系

### Transparent Business Relations

国轩高科始终坚持将合规、诚信、透明和公平的原则作为开展业务经营的基础和做出重大商业决定的依据，始终坚持依据透明、公平的标准选择商业伙伴。

国轩高科的商业伙伴应当以同样的标准开展业务，同时在与各自的商业伙伴建立合作关系时，也秉持合规与诚信的原则。

Gotion always insists on the principle of compliance, integrity, transparency and fairness, they are regarded as the foundation of conducting business and making business decisions. And meanwhile, when choosing business partners, Gotion holds the standard of transparency and fairness firmly.

The business partners of Gotion shall conduct business in the line of the same standards, additionally, to stick on the standard of compliance and integrity when choosing business partners as well.

#### 打击腐败

##### Prohibition of corruption

国轩高科践行廉洁合规的商业行为，坚决抵制任何形式的商业腐败。腐败行为会影响商业决定的公正性和客观性，限制公平的市场竞争，阻碍社会进步和商业的发展。打击商业腐败是公司避免损失的必然选择。

商业伙伴也应在业务流程中杜绝任何形式的腐败行为，确保其员工、分包商和代理商不会向客户、政府官员或其他第三方承诺、提供或者接受来自前述各方的贿赂（不当的礼品或招待）、回扣、通融费、不当捐赠等其他不当报酬或利益。

Gotion conducts business with integrity and compliance, and strongly reject any form of corruption in business. Corruption affects the fairness and objectivity of business decisions, limits the fair market competition as well as restricting the development of the society and business. In this regard, prohibition of corruption is an inevitable choice to avoid the damage to the company.

Business partners should prevent and stop all corruptive behaviors in business processes to assure that their employees, subcontractors and agents do not grant, offer or accept bribes (unjustified gifts and invitation), kickbacks, facilitation payments, improper donations or other unnormal payments or benefits to or from the customers, public officials or other third parties.

#### 避免利益冲突

##### Avoiding conflicts of interest

国轩高科严格管控员工间以及与商业伙伴间存在的各种利益冲突情形，同时期待商业伙伴也应当根据客观标准做出商业决定，而不受任何经济利益、个人利益或亲属及社会关系的影响。

Gotion imposes strict controls on conflicts of interest among its employees as well as between its employees and business partners. At the same time, Gotion expects its business partners to make business decisions without the influence of economic benefit, personal interest or family and social relationship.

## 公平的市场行为

### Fair Market Behavior

国轩高科始终坚持在公平和自由竞争原则的基础上开展各项业务，也始终遵守各类现行的法律法规，致力于营造公平的市场竞争环境。因此，国轩高科的商业伙伴也应在遵循公平、自由竞争的市场原则和相应的法律法规的基础上开展商业活动。

Gotion always insists on conducting business on the basis of the principle of fairness and free competition, and follows the applicable provisions of laws and regulations, devotes to creating a fair market competition environment. Therefore, business partners shall stick on the principle of fairness and free competition to conduct their business by obeying all provisions of applicable laws and regulations.

#### 公平自由竞争

##### Fair and free competition

商业伙伴应当杜绝竞争者之间为消除或限制公平自由竞争而签订的横向、纵向协议或其他协商一致的商业行为，以防止出现消除或限制公平自由竞争的情形。同时，商业伙伴应当坚决反对任何形式的获取竞争对手信息、情报的行为以及滥用市场支配地位的行为。

The business partners of Gotion should resolutely reject the horizontal or vertical agreements and other consensual business practices for the purpose of eliminating or restricting fair and free market competition, meanwhile, the behaviors in following manners are also prohibited: obtaining information and intelligence of competitors in any inappropriate way and abusing market dominance.

#### 进出口管制

##### Import and export controls

商业伙伴应在涉及商品、服务和信息进出口业务上严格遵守所有适用的法律法规，同时还应特别注意避免使用制裁名单上的产品或与制裁名单上的公司建立合作关系。

The business partners should strictly abide by all the applicable provisions of laws and regulations on the import and export of goods, services and information. Meanwhile, be cautious to avoid using products or forming cooperative relationship with companies in sanctions lists.

## 不支持武装团体

### Non-support to armed groups

商业伙伴应当确保其自身以及下级供应链没有直接或间接为支持非国家武装团体做出赞助或其他贡献。

The business partners should ensure that there is no direct/indirect sponsorship or other support to non-state armed groups from themselves and their supply chain.

## 保护机密信息

### Protection of confidential information

商业伙伴应当严格遵守关于信息安全、知识产权保护以及个人信息保护等法律法规，同时期待各商业伙伴在各自公司内建立严谨安全的信息安全保护系统和制度，以防止合作信息泄露给国轩高科及其员工、商业伙伴自身及其员工带来损失。同时，各商业伙伴应当在开展业务中注意尊重与保护各类第三方的信息和知识产权。

The business partners shall abide by the applicable provisions of laws and regulations with regard to information security, intellectual property protection, personal information protection etc, and establish a functional and secure information security protection system within the company to prevent any loss to Gotion, their business partners and employees from any form of information leakage. Meanwhile, to respect and protect the information and intellectual property of third parties when conducting business.





## 洗钱及恐怖主义融资

### Prohibition of money laundering and terrorism financing

商业伙伴应确保其在与国轩高科的业务合作中遵守国际和所在国适用的反洗钱和恐怖主义融资的法律规定。

The business partners shall assure that they abide by the applicable international and national provisions of laws and regulations on anti-money laundering and terrorism financing in the collaboration with Gotion.

## 信息披露

### Information disclosure

商业伙伴应透明、准确地记录所有业务往来，根据相关法规和现行行业实践披露有关劳工、健康与安全、财务状况等信息，不得伪造记录或虚报各种实际运营情况。

All business transactions of the business partners should be transparent and accurately recorded. Information on labor, health and safety, financial condition shall be disclosed in accordance with relevant regulations and current industry practices. Falsification of records or misrepresentation of actual operations is prohibited.

## 人工智能的使用

### Use of artificial intelligence

数据隐私和安全是使用人工智能的关键要求，商业伙伴应确保所有使用人工智能的发明创造都遵守所应适用的法律法规，同时还应确保人工智能应用程序的安全性和控制权始终属于人类，并应始终致力于提升人类的生活质量和福祉。

Data privacy and security are the key requirements when using AI. The business partners should ensure that all inventions and creations by using AI comply with applicable laws and regulations. They should also ensure that the security and control of AI applications always belong to humans and should always be committed to improving the quality of human life and well-being.

# 合规验证

## Verification of Compliance

国轩高科保留对商业伙伴是否遵守本公司商业伙伴行为准则以适当方式进行验证的权利，形式包括但不限于供应商澄清说明、合规访谈、现场评估等。

现场合规评估仅会在事先通知商业伙伴后开展，且会在正常工作时间内、有商业伙伴代表人员在场的情况下，遵守适用的法律（尤其是信息保护相关的法律法规）进行。

合规尽职调查问卷和现场合规评估有可能会在正式合同签订之前进行，商业伙伴则需配合国轩高科完成对合规的评估与验证。如发现任何不符合合规和可持续发展要求的情况，商业伙伴应在合理的期限内对其进行内部评价并完成相应整改，且保证执行的整改措施不会对与国轩高科的合作造成影响，国轩高科无需为此承担额外费用。

Gotion reserves the right to verify whether business partners abide by Code of Conduct for Business Partners by using appropriate measures, including but not limited to supplier declarations, compliance interviews, on-site assessments, etc.

An on-site assessment will only be carried out by following prior notification and in the presence of representatives of the business partner during regular working hours and in accordance with applicable laws, in particular with regard to information protection.

The business partner compliance due diligence questionnaire or on-site compliance assessment described above may take place prior to signing contracts, business partners should assist Gotion in completing evaluation and verification on abiding by compliance requirements. If any violations of compliance and sustainable development requirement are identified, business partners should assess and remedy the violations within a reasonable period of time, and ensure such assessment and rectification cause no influence on the cooperation with Gotion, additionally, Gotion does not need to bear any additional cost for it.

# 国轩高科举报系统

## Whistleblower system of Gotion

国轩高科要求员工遵守廉洁诚信规定，规范自身行为，同时也要求商业伙伴在合作过程中，坚持合法合规、诚信透明的商业行为。如果商业伙伴发现了任何国轩高科员工的违规行为或可能给国轩高科造成损失的情形，我们鼓励商业伙伴在掌握客观证据或产生合理怀疑的前提下联系国轩高科举报系统进行举报。

国轩高科举报系统始终秉承严谨性、保密性及公正性的原则对举报信息进行核实、调查和处理，从最大程度上确保对公司、举报人和被举报人的权利保障。

Employees of Gotion are requested to abide by the regulations of integrity and compliance to regulate their behaviors, in the same way, Gotion also requires its business partners to be in line with compliance, integrity and transparency in the cooperation with Gotion. If business partners detect any regulatory violations of Gotion's employees or any situation which may cause loss to Gotion, the business partners are strongly encouraged to make report to the whistleblower system of Gotion with concrete evidence or the existing reasonable suspicion.

The whistleblower system of Gotion works firmly with the principles of preciseness, confidentiality and fairness to verify, investigate and handle the reported information, in this regard, the protection of the company, implicated person and the whistleblowers can be guaranteed.





## 举报系统受理范围

### The scope of acceptance of whistleblower system

国轩高科举报系统主要处理严重损害国轩高科声誉和财务利益的不当行为，如：

- 国轩高科员工向商业伙伴索要好处费、辛苦费等索贿行为；
- 第三方向国轩高科员工行贿以谋求合作或其他不当目的；
- 国轩高科员工违反采购流程或限制公平市场竞争的行为，如无正当理由限制商业伙伴参与招投标等。

The whistleblower system of Gotion mainly handle the reported misconducts that might cause serious damage to the reputation and financial benefits of Gotion, such as:

- The employees of Gotion request for reward for go-between, thank-you reward or other behaviors of extorting bribes;
- Any third parties bribe the employees of Gotion for seeking unjustified cooperation or with other improper purpose;
- The employees of Gotion violate the standard purchasing process or restrict fair and free market competition, such as restricting business partners to participate into the bidding without legitimate reason.

## 举报系统联系方式

### The contact of whistleblower system

当面举报或写信举报的地址：

中国安徽省合肥市包河区花园大道566号国轩高科股份有限公司合规管理中心

举报热线电话号码：0551-62100065（请在工作日8:30--17:30拨打）

举报电子邮箱地址：[Jubao@Gotion.com.cn](mailto:Jubao@Gotion.com.cn)

Address for making face-to-face whistleblower report or writing a letter:

Compliance Management Center , Gotion High-Tech Co., Ltd., No.566 Huayuan Road,  
Baohe District, Hefei, Anhui, China

Number of hotline for making whistleblower report:

0551-6210 0065 (please contact the hotline by office hours during working days: Monday to Friday, 8:30 a.m. to 5:30 p.m.)

E-mail address for making whistleblower report:

[Jubao@Gotion.com.cn](mailto:Jubao@Gotion.com.cn)

# 违规的法律后果

## Legal consequences of violation

国轩高科的商业伙伴遵守本文件中列示的要求，对于国轩高科与商业伙伴建立和维系合作关系至关重要。如果商业伙伴已经发生或即将发生违反本准则的行为，国轩高科有权立即采取适当措施或法律手段，以防止、制止或最大限度地减少此类违规行为。同时，商业伙伴有义务及时采取一切适当措施来防止、制止或最大限度地减少此类违规行为以及配合国轩高科的措施执行。

国轩高科保留根据法律法规及监管要求对本《准则》进行合理修改的权利，本《准则》更新后将在公司官方网站进行发布，不再另行通知。在此情形下，商业伙伴应接受并遵照这些变更。本《准则》有中英文两个版本，具有同等效力，如中英文版本存在歧义，以中文版本为准。

The business partners' compliance to the requirements in this code is vital to strengthen the cooperative relationship between Gotion and business partners. If the business partners has violated or is about to violate this code, Gotion has the right to immediately take appropriate measures or legal means to prevent, stop or minimize such violations. At the same time, the business partners are obliged to take all appropriate measures in time to prevent, stop or minimize such violations and make cooperation to Gotion to implement the preventive measures. Gotion reserves the right to make reasonable modifications to this code in accordance with laws, regulations and regulatory requirements. This code will be published on the official website of Gotion after being updated without further notice. In this case, business partners are obligated to accept and comply with these changes. This code has two versions, Chinese and English versions, which have equal effect. If there is any ambiguity between the Chinese and English versions, the Chinese version shall prevail.

# 签收页

Sign Page

本公司已收到并仔细阅读国轩高科《商业伙伴行为准则》（版本：2025年3月），已知晓并承诺遵守其中的各项要求。

The company has received and carefully read The Code of Conduct for Business Partners (Status: 03/25) , and has been aware of and committed to comply with requirements therein.

日期：

Date:

公司法人签字：

Signature of Legal Representative:

公司公章：

Company Seal:





**方圆于心 ■ 合规于行**  
*Compliance Everywhere by Everyone*

国轩高科股份有限公司-供应商管理部  
国轩高科股份有限公司-合规管理中心  
Gotion High-Tech Co., Ltd  
Supplier Management Department  
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