

GCL SI

Code of Business Conduct

Preface

The *GCL SI Code of Business Conduct* (hereinafter referred to as “the Code”) aims to establish a set of unified standards and behavioral guidelines that must be followed in the business operations of GCL System Integration Technology Co.,Ltd. and all its subsidiaries (collectively referred to as “GCL SI” or the “Company”). This code applies to all directors, senior executives, and employees of the Company. In the event of any conflict between the provisions of this Code and the requirements of local laws and regulations where the company operates, the requirements of local laws and regulations shall be strictly followed.

GCL SI believes that through the strict implementation and continuous improvement of this Code, the Company will effectively prevent risks, enhance its corporate image, and lay a solid foundation for sustainable development. All employees should deeply understand and actively practice this Code, jointly shaping a business culture at GCL SI that is characterized by integrity, transparency, and accountability.

1. Anti-corruption and Anti-bribery

GCL SI is well aware of the serious negative impact of corruption on the business environment, economic performance and social equity. The Company is fully committed to promoting the principles of honest operation, strictly complying with applicable laws and regulations globally, and resolutely opposing corruption and bribery to shape a global business environment characterized by integrity, fairness, and transparency.

GCL SI takes the following measures to prevent and control corruption and bribery:

- Actively foster a corporate culture of lawful operation and integrity, and promote an honest and upright business environment. Advocate directors and management to set an example to all staff by abiding by laws, regulations, rules and ethical business practices. Enhance awareness and capabilities of anti-corruption and anti-bribery through various forms of communication, training, and advocacy.
- Establish and continuously refine mechanisms of anti-corruption and anti-bribery. Strictly prohibit any illegal or irregular behavior such as abuse of power, misappropriation or embezzlement of company assets, accepting or offering bribes.
- In addition to advocating and practicing compliance with laws and ethical standards within the Company, actively inform relevant stakeholders of our anti-corruption and bribery policies and procedures. Through measures including signing anti-corruption and anti-bribery commitments and providing open channels for reporting, strengthen prevention and control measures before, during, and after potential incidents, collectively building a business environment of integrity and honesty.
- If any corrupt or bribery behavior is discovered, employees can lodge complaints or reports through internal channels.

2. Avoidance of Conflict of Interest

GCL SI strives to avoid any potential conflicts of interest that may arise in business operations. Employees of GCL SI and individuals providing services for or on behalf of GCL SI are obligated to proactively disclose and avoid any actual or potential conflicts of interest.

The Definition of Conflict of Interest:

A conflict of interest occurs when an individual's activities or personal relationships actually or potentially interfere with their ability to perform fairly and objectively his or her job duties and make business decisions in the best interest of the Company. For example:

- The employees and their spouses, or close relatives hold positions or have financial interests in current or potential clients, suppliers, or competitors of the Company.
- Economic entity of the employees' spouses, or close relatives engages in business dealings with the Company.
- The employees' spouses or close relatives working in the same company as the employees, department, or even have a superior and subordinate relationship.

GCL SI takes the following measures to prevent and avoid conflicts of interest:

- Require our employees to proactively declare conflicts of interest.
- Strictly prohibit our employees from using company resources without prior permission for personal affairs or personal gain.
- The Company takes appropriate measures, where feasible, to mitigate unavoidable conflicts of interest, including adjusting positions, work assignments, or business relationships when necessary.

3. Anti-money Laundering

GCL SI strictly adheres to applicable regulations on anti-money laundering, only maintaining business relationships with law-abiding enterprises with legitimate financial sources, and paying attention to the risks of being used for money laundering in business processes.

The Definition of Money Laundering:

Money laundering refers to the act and process of disguising, concealing, or transforming proceeds of crime or other illegal activities and their profits through various means to make them appear legitimate.

GCL SI takes the following measures to prevent money laundering:

- Strictly complying with applicable anti-money laundering regulations.
- Avoiding accepting illegal funds or participating in activities and transactions involving illegal funds.
- Conducting appropriate due diligence on business partners and assets received by the company (such as funds, goods, raw materials, equipment, etc.).
- Paying particular attention to the use of large cash payments in business transactions.
- Choosing safe and reliable financial institutions and cooperating with them to conduct identity recognition on the company or customers in business transactions.
- Cooperating with supervision and management by government agencies for import and export transaction funds.

GCL SI provides training and exchanges on anti-money laundering. If any suspicious issues regarding the ownership of business partners and payment transactions are identified, please report them to the Risk Control and Audit Department promptly.

4. Prevention of Insider Trading

GCL SI strictly prohibits the use or sharing of material non-public information about GCL SI for the purpose of trading securities. All employees are prohibited from trading securities while in possession of material non-public information, regardless of whether the information pertains to the Company or another.

Definition of Insider Information:

Insider information refers to nonpublic information in securities trading activities that involves the operations, finances, or other matters of the issuer that could have a significant impact on the market price of the issuer's securities or the investment decisions of investors. Generally, any information that could affect the value of stocks or other securities should be considered material. For example:

- Financial results or forecasts, or any information indicating that a company's financial results may exceed or fall below forecasts or expectations;
- Significant new products or services;
- Pending or anticipated acquisition or dispositions, including mergers, tender offers, or joint venture intentions;
- Potential changes in management or control;
- Pending or anticipated public offerings or private placements of debt or equity securities;
- Acquisition or loss of significant customers or contracts;
- Significant write-offs;
- Initiation or settlement of significant litigation; and
- Changes in the company's auditors or notifications from auditors that the company can no longer rely on their audit reports.

GCL SI takes the following measures to prevent insider trading:

The laws governing insider trading are specific and complex. Violations of insider trading laws can result in civil and criminal penalties, and the company may also take disciplinary action, up to and including termination of employment. Employees with access to insider information must:

- Refrain from trading securities while in possession of material non-public information.
- Be strictly prohibited from recommending, suggesting, or implying, directly or indirectly, to any third party (including the employee's family members or other relatives and friends) for trading in the stocks or other securities of the Company or other companies.

If there are any doubts about the information held or any transactions involving company securities, please promptly bring them to the attention of the Risk Control and Audit Department. If there are any questions about buying or selling stocks or other securities, please consult the Risk Control and Audit Department before executing any related transactions.

5. Information Confidentiality

GCL SI regards confidential information as a vital intellectual asset. Violating confidentiality obligations and disclosing confidential information may not only result in losses for GCL SI but also lead to severe consequences for the individuals involved, such as termination of employment, financial compensation, administrative actions, or even criminal liability. GCL SI has established a comprehensive confidentiality system and requires all employees and partners to take appropriate measures to ensure that confidential information is not misused, stolen, tampered with, or lost.

The Definition of Confidential Information:

- Confidential information refers to various types of data that the company keeps confidential from external sources. This includes any non-public information that, if disclosed, could be utilized by competitors or could harm the interests of GCL SI, its clients, or its suppliers. Examples include (but are not limited to):
 - Business-related: Business data, partner and supplier information, customer lists and details, industry policies, plans, trade secrets, new marketing platforms or strategies, sales data, and sales forecasts.
 - Product-related: Plans for new products, technical formulas, trade secrets, expertise, research and development data and results, production processes, and techniques.
 - Operational: Financial data, personnel information, acquisition plans, investment plans, etc.
- Confidential information may be stored in computer information system data and media or may exist in paper, verbal, or other forms.

GCL SI takes the following measures to protect confidential information:

- Implementing confidentiality measures in accordance with the Company's confidentiality policies and management requirements to properly manage confidential information.
- Allowing only employees who require access to confidential information for their job duties to obtain such information, ensuring that confidential information circulates only within the necessary scope to achieve business objectives.
- Prohibiting discussion or disclosure of confidential information in public areas.
- Continuously adhering to confidentiality obligations, refraining from disclosing confidential information or using it for purposes unrelated to business, whether during employment or after termination, unless the information has been publicly disclosed by the company or is available to the public through no fault of the employee.

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- Clearly defining confidentiality responsibilities in external collaborations, signing confidentiality agreements before disclosing company confidential information to external parties for business purposes, and taking precautions against leaks.
 - Returning any medium containing confidential information to the Company immediately after termination of employment or at any other time as required by the Company, and refraining from retaining duplicates.

If there are any questions or concerns regarding whether disclosure of company information is legally mandatory or suspected leakage of confidential information, please contact the Risk Control and Audit Department promptly.

6. Anti-monopoly and Fair Competition

GCL SI respects the principles of fair and legitimate business competition and complies with applicable laws and regulations advocating fair competition among business entities. Under no circumstances does GCL SI engage in practices that restrict competition or violate applicable antitrust and unfair competition laws and regulations.

The Definition of Monopoly and Unfair Competition:

The specific definitions of monopoly and unfair competition may vary across different countries and regions. However, the basic principles of antitrust laws and similar laws against unfair competition aim to encourage free market competition and trade while protecting the normal order of the free market. Violating relevant laws can result in serious consequences for the company and its employees, including reputational and market losses, as well as potential administrative and criminal liabilities.

GCL SI takes the following measures against monopoly and unfair competition:

- Strict compliance with relevant antitrust and unfair competition laws and regulations as well as Company policies.
- Avoidance of entering into monopoly/anti-competition agreements with competitors.
- Refraining from negotiating or entering into agreements with competitors that affect market competition, such as fixing prices, dividing markets, boycotting transactions, restricting production or technology development.
- Avoidance of exchanging sensitive business information with competitors, such as production costs, sales prices, customer lists, future strategic plans, etc.
- Abstaining from leveraging the Company's market dominance to exclude competitors, impose unreasonable trading conditions, or engage in forced tying or bundling of products/services.
- Non-discriminatory treatment of customers and suppliers to ensure equal access to market opportunities for all parties involved.
- Abstaining from fabricating, disseminating false or misleading information that could damage the business reputation or product reputation of competitors.

If there are doubts about whether certain behavior may constitute monopoly or unfair competition, or if suspicions arise regarding the implementation of monopoly or unfair competition practices by competitors during transactions, please consult the Risk Control and Audit Department promptly.

7. Environmental Protection

GCL SI adheres to the mission of “Focusing on Green Development, Continuously Improving the Human Living Environment”, committed to continuously improving environmental performance, setting environmental goals, and actively taking measures to reduce environmental impact.

GCL SI takes the following measures to implement the environmental protection commitment:

- Strictly adhering to the *Environmental Protection Law of the People’s Republic of China*, the *Law of the People’s Republic of China on Energy Conservation*, and other applicable laws and regulations at the place of operation.
- Continuously improving the environmental management system, developing and implementing environmental management policies and procedures.
- Actively taking measures to reduce greenhouse gas emissions, energy usage, water usage, and waste emissions, promoting technological and managerial innovations to enhance the company’s environmental protection performance.
- Conducting regular environmental protection training and various low-carbon, eco-friendly themed activities, deepening all employees’ understanding of the environmental impact of their work activities, clarifying responsibilities in areas such as greenhouse gas emissions, energy management, water resource management, and waste management, and advocating for green and sustainable practices.

8. Anti-discrimination and Anti-harassment

GCL SI respects the human rights of employees and is committed to eliminating any form of workplace discrimination, harassment, and abuse. The Company strives to create a diverse, inclusive, and equal workplace, ensuring that all employees have equal opportunities for work, development, and compensation.

GCL SI takes the following measures to prevent workplace discrimination and harassment:

- Strictly adhering to applicable laws and regulations such as the *Civil Code of the People's Republic of China* and the *Labor Law of the People's Republic of China*, respecting and protecting the legitimate rights and interests of employees, and actively fostering a fair, diverse, and inclusive work environment.
- Prohibiting the use of child labor and any form of forced labor.
- Resolutely preventing discrimination against employees based on gender, age, ethnicity, race, nationality, religious belief, disability, marital status, or reproductive status in recruitment, promotion, training, or any other aspect of employment.
- Strictly prohibiting any form of harassment, whether related to gender/sex or not, whether explicit or implicit.
- Respecting the right of assembly, the freedom of association, and the right to join labor unions in accordance with the applicable laws.
- Organizing regular training on human rights protection, anti-discrimination, and anti-harassment.
- Establishing internal channels for reporting complaints, allowing employees to report instances of discrimination or unfair treatment.

9. Employee Health and Safety

GCL SI attaches great importance to the occupational health and safety of its employees, adhering to the concept of “people-oriented”, and is committed to building and maintaining a safe and reliable working environment.

GCL SI takes the following measures to maintain the occupational health and safety:

- Strictly complying with applicable laws and regulations, establishing and continuously improving occupational health and safety management systems that comply with international standards, and developing and implementing detailed occupational health and safety management regulations.
- Organizing regular occupational health and safety education and training to enhance employees' awareness of occupational health and safety, ensuring that each employee is familiar with the safety responsibilities and requirements of their respective positions.
- Providing employees with appropriate personal protective equipment according to the characteristics of their work environment, such as dust masks, protective goggles, safety helmets, etc.
- Conducting regular safety inspections of production equipment, tools, and workplaces, promptly repairing and updating aging or damaged equipment, and eliminating safety hazards.

10. Reporting Mechanism and Whistleblower Protection

GCL SI values feedback, complaints, and reports from employees, external third parties, and other stakeholders. We have established an effective mechanism for receiving and addressing feedback, complaints, and reports, as well as protecting whistleblowers.

Employees at all levels of GCL SI, as well as stakeholders with direct or indirect economic relations with the Company, may report violations through various channels such as letters, emails (including but not limited to jubao@gcl-power.com), phone calls, or in-person meetings.

GCL SI will promptly record all received reports and conduct a timely analysis and assessment of the reported matters, with actions taken based on the following principles:

- If the reported matter involves GCL SI's management center, its subsidiaries, or is deemed necessary by the management level to conduct preliminary investigation with the Risk Control and Audit Department, the Risk Control and Audit Department shall conduct a preliminary investigation within 10 working days from the date of receiving the report (excluding special circumstances). If the preliminary investigation confirms the substantial accuracy of the reported facts, the matter shall be immediately reported to the CEO for approval to proceed with a thorough investigation.
- If the reported involves personnel from the investigation department, reports can be directly made to their supervisory departments. If the whistleblower believes that the employee handling the report have a conflict of interest between the reported individual that may affect objective and fair addressing, they have the right to request recusal to the relevant internal control department's superiors. If substantiated, the concerned individuals must recuse themselves from the investigation.
- The Risk Control and Audit Department of GCL SI's management center may engage external organizations for assistance in investigations, as deemed necessary.

GCL SI places significant emphasis on safeguarding the legal rights and information of whistleblowers. Specific protective measures include but are not limited to:

- All departments and subsidiaries of GCL SI shall cooperate to protect the legal rights of whistleblowers based on respective duties, avoid any form of retaliation against whistleblowers under any circumstances.
- Strictly prohibit disclose the names, workplaces, addresses, or any related information about whistleblowers, as well as the content of their reports, to the reported individuals or entities.
- If the reported individual is a senior leader of his or her organization, the report materials shall not be transferred to the organization where the person in charge.
- Departments responsible for receiving and handling reports must adhere to relevant confidentiality regulations. To prevent leakage of reporting information and loss of reporting materials, privately transcribe or copy of whistleblower materials is not allowed.
- Whistleblowers who encounter unfair treatment due to their reports have the right to appeal to the Risk Control and Audit Department. The Risk Control and Audit Department shall make corrections or recommend the relevant parties to make correction. Those who refuse to make corrections shall be punished according to GCL SI's *Employee Reward and Punishment Management Standards*.
- Report information must be archived and stored by designated personnel, and access to it requires special authorization. In cases where accessing whistleblower-related data is necessary for work

purposes, approval from the Risk Control and Audit Department leaders must be obtained, and the details of access, including the reasons, content and timing, must be recorded by internal audit and control departments.

- During investigations, testimonies of whistleblowers shall only serve as clues for finding other evidence, and efforts shall be made to minimize the reliance on or use of whistleblowers' statements.
- Internal investigation reports must conceal the names and other personal information of whistleblowers.
- Prohibit any form of illegal discrimination or retaliation against whistleblowers or employees participate in investigations.
- Personnel who illegally disclose information of whistleblowers or retaliate against whistleblowers shall terminated from their labor contracts and never be employed once verified.

Zhu Yufeng

Chairman of GCL System Integration Technology Co., Ltd

Bringing Green Power to Life

GCL SI

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- Refrain from trading securities while in possession of material non-public information.
- Be strictly prohibited from recommending, suggesting, or implying, directly or indirectly, to any third party (including the employee's family members or other relatives and friends) for trading in the stocks or other securities of the Company or other companies.

If there are any doubts about the information held or any transactions involving company securities, please promptly bring them to the attention of the Risk Control and Audit Department. If there are any questions about buying or selling stocks or other securities, please consult the Risk Control and Audit



Department before executing any related transactions.

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 - Business-related: Business data, partner and supplier information, customer lists and details, industry policies, plans, trade secrets, new marketing platforms or strategies, sales data, and sales forecasts.
 - Product-related: Plans for new products, technical formulas, trade secrets, expertise, research and development data and results, production processes, and techniques.
 - Operational: Financial data, personnel information, acquisition plans, investment plans, etc.
- Confidential information may be stored in computer information system data and media or may exist in paper, verbal, or other forms.

GCL SI takes the following measures to protect confidential information:

- Implementing confidentiality measures in accordance with the Company's confidentiality policies and management requirements to properly manage confidential information.
- Allowing only employees who require access to confidential information for their job duties to obtain such information, ensuring that confidential information circulates only within the necessary scope to achieve business objectives.
- Prohibiting discussion or disclosure of confidential information in public areas.
- Continuously adhering to confidentiality obligations, refraining from disclosing confidential information or using it for purposes unrelated to business, whether during employment or after termination, unless the information has been publicly disclosed by the company or is available to the public through no fault of the employee.

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- Clearly defining confidentiality responsibilities in external collaborations, signing confidentiality agreements before disclosing company confidential information to external parties for business purposes, and taking precautions against leaks.
 - Returning any medium containing confidential information to the Company immediately after termination of employment or at any other time as required by the Company, and refraining from retaining duplicates.

If there are any questions or concerns regarding whether disclosure of company information is legally mandatory or suspected leakage of confidential information, please contact the Risk Control and Audit Department promptly.

6. Anti-monopoly and Fair Competition

GCL SI respects the principles of fair and legitimate business competition and complies with applicable laws and regulations advocating fair competition among business entities. Under no circumstances does GCL SI engage in practices that restrict competition or violate applicable antitrust and unfair competition laws and regulations.

The Definition of Monopoly and Unfair Competition:

The specific definitions of monopoly and unfair competition may vary across different countries and regions. However, the basic principles of antitrust laws and similar laws against unfair competition aim to encourage free market competition and trade while protecting the normal order of the free market. Violating relevant laws can result in serious consequences for the company and its employees, including reputational and market losses, as well as potential administrative and criminal liabilities.

GCL SI takes the following measures against monopoly and unfair competition:

- Strict compliance with relevant antitrust and unfair competition laws and regulations as well as Company policies.
- Avoidance of entering into monopoly/anti-competition agreements with competitors.
- Refraining from negotiating or entering into agreements with competitors that affect market competition, such as fixing prices, dividing markets, boycotting transactions, restricting production or technology development.
- Avoidance of exchanging sensitive business information with competitors, such as production costs, sales prices, customer lists, future strategic plans, etc.
- Abstaining from leveraging the Company's market dominance to exclude competitors, impose unreasonable trading conditions, or engage in forced tying or bundling of products/services.
- Non-discriminatory treatment of customers and suppliers to ensure equal access to market opportunities for all parties involved.
- Abstaining from fabricating, disseminating false or misleading information that could damage the business reputation or product reputation of competitors.

If there are doubts about whether certain behavior may constitute monopoly or unfair competition, or if suspicions arise regarding the implementation of monopoly or unfair competition practices by competitors during transactions, please consult the Risk Control and Audit Department promptly.

7. Environmental Protection

GCL SI adheres to the mission of “Focusing on Green Development, Continuously Improving the Human Living Environment”, committed to continuously improving environmental performance, setting environmental goals, and actively taking measures to reduce environmental impact.

GCL SI takes the following measures to implement the environmental protection commitment:

- Strictly adhering to the *Environmental Protection Law of the People’s Republic of China*, the *Law of the People’s Republic of China on Energy Conservation*, and other applicable laws and regulations at the place of operation.
- Continuously improving the environmental management system, developing and implementing environmental management policies and procedures.
- Actively taking measures to reduce greenhouse gas emissions, energy usage, water usage, and waste emissions, promoting technological and managerial innovations to enhance the company’s environmental protection performance.
- Conducting regular environmental protection training and various low-carbon, eco-friendly themed activities, deepening all employees’ understanding of the environmental impact of their work activities, clarifying responsibilities in areas such as greenhouse gas emissions, energy management, water resource management, and waste management, and advocating for green and sustainable practices.

8. Anti-discrimination and Anti-harassment

GCL SI respects the human rights of employees and is committed to eliminating any form of workplace discrimination, harassment, and abuse. The Company strives to create a diverse, inclusive, and equal workplace, ensuring that all employees have equal opportunities for work, development, and compensation.

GCL SI takes the following measures to prevent workplace discrimination and harassment:

- Strictly adhering to applicable laws and regulations such as the *Civil Code of the People's Republic of China* and the *Labor Law of the People's Republic of China*, respecting and protecting the legitimate rights and interests of employees, and actively fostering a fair, diverse, and inclusive work environment.
- Prohibiting the use of child labor and any form of forced labor.
- Resolutely preventing discrimination against employees based on gender, age, ethnicity, race, nationality, religious belief, disability, marital status, or reproductive status in recruitment, promotion, training, or any other aspect of employment.
- Strictly prohibiting any form of harassment, whether related to gender/sex or not, whether explicit or implicit.
- Respecting the right of assembly, the freedom of association, and the right to join labor unions in accordance with the applicable laws.
- Organizing regular training on human rights protection, anti-discrimination, and anti-harassment.
- Establishing internal channels for reporting complaints, allowing employees to report instances of discrimination or unfair treatment.

9. Employee Health and Safety

GCL SI attaches great importance to the occupational health and safety of its employees, adhering to the concept of “people-oriented”, and is committed to building and maintaining a safe and reliable working environment.

GCL SI takes the following measures to maintain the occupational health and safety:

- Strictly complying with applicable laws and regulations, establishing and continuously improving occupational health and safety management systems that comply with international standards, and developing and implementing detailed occupational health and safety management regulations.
- Organizing regular occupational health and safety education and training to enhance employees' awareness of occupational health and safety, ensuring that each employee is familiar with the safety responsibilities and requirements of their respective positions.
- Providing employees with appropriate personal protective equipment according to the characteristics of their work environment, such as dust masks, protective goggles, safety helmets, etc.
- Conducting regular safety inspections of production equipment, tools, and workplaces, promptly repairing and updating aging or damaged equipment, and eliminating safety hazards.

10. Reporting Mechanism and Whistleblower Protection

GCL SI values feedback, complaints, and reports from employees, external third parties, and other stakeholders. We have established an effective mechanism for receiving and addressing feedback, complaints, and reports, as well as protecting whistleblowers.

Employees at all levels of GCL SI, as well as stakeholders with direct or indirect economic relations with the Company, may report violations through various channels such as letters, emails (including but not limited to jubao@gcl-power.com), phone calls, or in-person meetings.

GCL SI will promptly record all received reports and conduct a timely analysis and assessment of the reported matters, with actions taken based on the following principles:

- If the reported matter involves GCL SI's management center, its subsidiaries, or is deemed necessary by the management level to conduct preliminary investigation with the Risk Control and Audit Department, the Risk Control and Audit Department shall conduct a preliminary investigation within 10 working days from the date of receiving the report (excluding special circumstances). If the preliminary investigation confirms the substantial accuracy of the reported facts, the matter shall be immediately reported to the CEO for approval to proceed with a thorough investigation.
- If the reported involves personnel from the investigation department, reports can be directly made to their supervisory departments. If the whistleblower believes that the employee handling the report have a conflict of interest between the reported individual that may affect objective and fair addressing, they have the right to request recusal to the relevant internal control department's superiors. If substantiated, the concerned individuals must recuse themselves from the investigation.
- The Risk Control and Audit Department of GCL SI's management center may engage external organizations for assistance in investigations, as deemed necessary.

GCL SI places significant emphasis on safeguarding the legal rights and information of whistleblowers. Specific protective measures include but are not limited to:

- All departments and subsidiaries of GCL SI shall cooperate to protect the legal rights of whistleblowers based on respective duties, avoid any form of retaliation against whistleblowers under any circumstances.
- Strictly prohibit disclose the names, workplaces, addresses, or any related information about whistleblowers, as well as the content of their reports, to the reported individuals or entities.
- If the reported individual is a senior leader of his or her organization, the report materials shall not be transferred to the organization where the person in charge.
- Departments responsible for receiving and handling reports must adhere to relevant confidentiality regulations. To prevent leakage of reporting information and loss of reporting materials, privately transcribe or copy of whistleblower materials is not allowed.
- Whistleblowers who encounter unfair treatment due to their reports have the right to appeal to the Risk Control and Audit Department. The Risk Control and Audit Department shall make corrections or recommend the relevant parties to make correction. Those who refuse to make corrections shall be punished according to GCL SI's *Employee Reward and Punishment Management Standards*.
- Report information must be archived and stored by designated personnel, and access to it

requires special authorization. In cases where accessing whistleblower-related data is necessary for work purposes, approval from the Risk Control and Audit Department leaders must be obtained, and the details of access, including the reasons, content and timing, must be recorded by internal audit and control departments.

- During investigations, testimonies of whistleblowers shall only serve as clues for finding other evidence, and efforts shall be made to minimize the reliance on or use of whistleblowers' statements.
- Internal investigation reports must conceal the names and other personal information of whistleblowers.
- Prohibit any form of illegal discrimination or retaliation against whistleblowers or employees participate in investigations.
- Personnel who illegally disclose information of whistleblowers or retaliate against whistleblowers shall terminated from their labor contracts and never be employed once verified.



Zhu Yufeng

Chairman of GCL System Integration Technology Co., Ltd