

GCL SI

Anti-Corruption Policies

Anti-corruption Commitment

GCL SI is fully committed to implementing the principles of honest operation, strictly complying with applicable laws and regulations globally, and resolutely opposing corrupt practices. We aim to shape a global business environment characterized by integrity, fairness, and transparency. As a leading enterprise in the photovoltaic industry, we deeply understand the serious negative impact of corrupt behavior on the business environment, economic benefits, and social equity. Therefore, we make the following commitments:

- Strictly abide by all anti-corruption laws and regulations applicable to the Company, including prohibiting bribery, misappropriation of company assets, abuse of power, etc., to safeguard the legitimate rights and interests of the Company.
- Establish and continuously improve internal anti-corruption policies and procedures, clarify the responsibilities and obligations of senior management and employees in anti-corruption efforts, and enhance training to increase awareness and capabilities of anti-corruption.
- Advocate for business ethics based on integrity and transparency, requiring employees to adhere to ethical norms in commercial activities and firmly reject any form of fraud, bribery, or corruption.
- Conduct regular audits and inspections of internal anti-corruption measures within the Company. Any instances of corruption discovered will be rigorously investigated and dealt with in accordance with laws, regulations, and company policies, including imposing legal liabilities and internal disciplinary actions on those responsible.
- Collaborate with customers, partners, suppliers, and other stakeholders to jointly foster a clean and healthy market environment. This includes signing anti-corruption agreements and establishing reporting mechanisms to collectively combat corrupt practices.
- Commit to objective and truthful information disclosure and publicity without engaging in any form of false advertising or commercial defamation, thereby establishing a positive corporate image.

Prohibition of Corruption and Bribery

We take 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. Clarify the responsibilities and obligations of senior management and employees in anti-corruption efforts. 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.

Avoidance of Conflict of Interest

Employees of GCL SI and individuals providing services for or on behalf of the Company are obligated to proactively disclose and avoid any actual or potential conflicts of interest. A conflict of interest occurs when an individual's activities or personal relationships actually or potentially interfere with their ability to fairly and objectively perform 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.

We take 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.

Guidelines for Engagements with Third Parties

GCL SI places great importance on external collaboration with third parties. When engaging in cooperation with third parties, the Company will implement effective measures to ensure transparency, fairness, legality, and compliance with the interests of the Company, all stakeholders, and society as a whole.

- Individuals responsible for selecting third party agents (enterprises or individuals) acting on behalf of or representing GCL SI shall conduct proper evaluation to ensure collaboration only with reputable parties.
- Individuals responsible for the supervision and monitoring of activities conducted by third party agents should closely monitor their behavior to ensure compliance with ethical standards of the Company, including but not limited to internal policies and regulations, and timely report any violations.
- Conduct thorough review of contract terms before entering into agreements with third party agent, clarifying rights and obligations to avoid ambiguity or disputes.
- Uphold principles of integrity, fairness, and transparency during communication or collaboration with third party agents. Do not offer or accept any form of bribery, kickbacks, or other illicit benefits.
- Adhere to relevant laws and regulations and respect local customs during engagements with third party agents. Avoid any actions that could harm the reputation or interests of the Company.
- Prompt settlement of fees and keep relevant documentation and records after the cooperation with third party agents in case of verification or audit.

Reporting Mechanism

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 *Employee Reward and Punishment Management Standards* of GCL SI.
- 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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