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☐ 初版 Original edition ☒ 修订 Revision ☐ 作废 Obsolescence

修订记录 Revision history:

版本 Revision	日期 Date	修订内容 Description of changes
3.1	2016/11/16	增加客户、供应商赠礼相关规定 Add regulations on gifts from customers and suppliers.
3.2	2022/1/12	增加禁止共谋勾结行为相关规定 Add regulations prohibiting collusion and conspiracy.
4.0	2024/11/25	1、变更文件名称 Change document name 2、更新适用范围 Update scope of application 3、更新遵守准则 Update compliance guidelines 4、更新举报管理 Update whistleblower management 5、更新利益冲突管理 Update conflict of interest management 6、更新反腐败与反贿赂 Update anti-corruption and anti-bribery 7、更新礼品、礼金和招待 Update gifts, cash gifts, and hospitality 8、更新反欺诈与公平竞争 Update anti-fraud and fair competition 9、更新其他重要行为准则规范 Update other important code of conduct regulations 10、更新奖惩措施 Update rewards and punishments measures 11、更新培训宣贯 Update training and communication 12、更新持续监督与改进 Update continuous supervision and improvement

1.0 目的 Purpose

为营造廉洁诚信的职场文化，践行高标准的职业道德，预防利用职务及职权便利牟取不正当利益。

To create a culture of integrity and honesty in the workplace, to practice high standards of professional ethics, and to prevent the exploitation of positions and authority for improper benefits.

2.0 适用范围 Scope

本准则适用于旭创科技、各子公司、分支机构及关联公司（“公司”）的正式员工、实习生、董事、监事和高级管理人员等，以及被指派为或代表旭创科技工作或服务的个人，包括劳务/顾问、第三方派遣和外包人员等。上述人员在准则中统一称为“员工”、“我们”或“你”。为避免歧义应指出，本准则不构成与相关人员的劳动关系。These guidelines apply to formal employees, interns, directors, supervisors, and senior management of Innolight Technology, its subsidiaries, branches, and affiliated companies (the “Company”), as well as individuals assigned to or representing Innolight Technology in work or service, including labor workers/consultants, third-party dispatch, and outsourced personnel. The aforementioned personnel are collectively referred to as “employees,” “we,” or “you” in these guidelines. To avoid ambiguity, it should be noted that these guidelines do not constitute a labor relationship with the relevant personnel.

3.0 职责 Duties

内控管理部负责廉洁自律准则的持续有效运行和监督。

The Internal Control Department is responsible for the continuous and effective operation and supervision of the integrity and self-discipline guidelines.

4.0 图表 Charts

无。

None.

5.0 内容 Content

5.1 遵守准则 Guidelines

5.1.1 作为旭创科技员工，我们应当：

As employees of Innolight Technology, we should:

a) 遵守准则和公司其他相关制度和政策，坚持正确的判断与合理的决策，积极营造廉洁诚信的工作氛围；
Follow the guidelines and the company’s other relevant systems and policies, maintain correct judgment and reasonable decision-making, and actively foster a work environment of integrity and honesty;

b) 对违规行为保持警惕，不轻视也不纵容，勇于反馈和直言，并积极支持调查。

Remain vigilant against violations, neither trivializing nor condoning them, be brave in providing feedback and speaking out, and actively support investigations.

5.1.2 从事各项业务时，我们应遵守如下原则：

In conducting various business activities, we should follow these principles:

a) 以客户满意为目标，提供优质产品和服务；

Aim for customer satisfaction by providing high-quality products and services;

b) 遵守法律法规，维护公司的合法权益。

Comply with laws and regulations to protect the company's legal rights and interests.

5.1.3 在任何情况下，没有阅读或理解准则不作为豁免遵循准则规定或要求的理由。违反行为将基于行为性质和严重程度，根据员工手册，受到不同的纪律处分措施。如果存在潜在的违法或违规行为，公司将配合相关监管机构予以处理。

In any case, not having read or understood the guidelines shall not serve as a reason for exemption from following the guidelines or their requirements. Violations will be subject to different disciplinary measures based on the nature and severity of the behavior, in accordance with the employee handbook. If there are potential illegal or non-compliant behaviors, the company will cooperate with relevant regulatory authorities for handling.

5.2 举报管理 Report fraud tips

5.2.1 鼓励发声 Encourage speaking out

5.2.1.1 旭创科技重视每位员工的声音，并致力于加强问责。因此，如果你被要求做出令你感到不适的行为，或者发现或怀疑有违反准则和法律法规的行为，请通过以下渠道举报：

Innolight Technology values the voice of every employee and is committed to strengthening accountability. Therefore, if you are asked to engage in behavior that makes you uncomfortable, or if you discover or suspect any violation of guidelines and laws and regulations, please report it through the following channels:

a) 邮件举报: anti_fraud@innolight.com;

Email: anti_fraud@innolight.com;

b) 电话举报: 0512-8666 9288-8999;

Telephone : 0512-8666 9288-8999;

c) 向内控管理部及人力资源部举报：（可通过官微查看联系方式，或当面约谈举报）

Report to the Internal Control Department and the Human Resources Department; (you can find contact information through the official WeChat account, or arrange a face-to-face meeting to report).

d) 向主管（包括总经理）举报。（可通过官微查看各部门主管联系方式）

Report to your supervisor (including the General Manager). (You can check the contact information of department supervisors through the official WeChat account).

5.2.1.2 无论你选择哪种方式举报，反馈的信息和问题都会被认真对待并严格保密。

No matter which method you choose to report, the feedback and issues will be taken seriously and kept strictly confidential.

5.2.1.3 我们提倡实名举报，举报人应出于善意，本着真实、完整的原则，提供有效的举报信息。故意捏

造虚假信息、诬告陷害他人或以举报为名制造事端，干扰正常工作等提供不实举报信息行为，公司将严肃处理、追究责任。（经调查，由于对事实了解不全而发生误告、错告的失实投诉或举报除外）

We advocate for reporting in real name, and reporters should act in good faith, adhere to the principles of truth and completeness, and provide effective reporting information. Deliberately fabricating false information, framing others, or creating disturbances under the guise of reporting, which disrupts normal work and provides false reporting information, will be dealt with seriously and held accountable by the company. (Misunderstandings or false complaints or reports that occur due to incomplete understanding of the facts, as investigated, are excluded).

5.2.2 受理与调查 Acceptance and Investigation

5.2.2.1 公司设立廉洁自律监督委员会，对廉洁自律问题进行管理和监督。

The company establishes a Integrity and Self-Discipline Supervision Committee to manage and supervise issues related to integrity and self-discipline.

小组负责人:总经理

Group Leader: General Manager

小组召集人:内控管理部/人力资源部

Convener of the Group: Internal Control Department/Human Resources Department

小组成员:相关部门主管

Group Members: Heads of Relevant Departments

5.2.2.2 受理部门及工作人员接受举报和调查举报案件，首先应当严格遵守下列保密规定：

The departments and staff responsible for receiving reports and investigating reported cases must strictly adhere to the following confidentiality regulations first:

a) 受理信件&电话举报时，收发、接听等工作，应做好相关保密的准备工作；

When handling letters and telephone reports, the work of sending and receiving, answering, etc., should be well prepared in terms of confidentiality.

b) 受理当面举报时，应当在能够保密的场所进行，无关人员不得旁听和询问；

When receiving reports in person, the meeting should be conducted in a place that ensures confidentiality, and unauthorized personnel are not allowed to eavesdrop or inquire.

c) 调查被举报人或被举报单位时，应做好保密工作，不得出示举报材料；

When investigating the person or unit being reported, confidentiality should be maintained, and the reporting materials should not be disclosed.

d) 公告或奖励举报人员和拒收贿赂人员时，除征得相关人员的同意外，不得公开人员的姓名、部门等相关信息。

When announcing or rewarding whistleblowers and those who refuse bribes, the names, departments, and other related information of the individuals should not be disclosed without their consent.

5.2.2.3 调查流程 Investigation Process

- a) 受理：对于廉洁违纪问题的揭发、检举、控告，内控管理部应于三个工作日内受理，并按需组建调查团队进行公平、客观、全面调查，对所反映的问题线索、事件性质必须登记备案。

Acceptance: For the exposure, reporting, and accusation of integrity violations and disciplinary issues, the Internal Control Management Department should accept them within three working days and, as needed, form an investigation team to conduct a fair, objective, and comprehensive investigation. All reported problem clues and the nature of the events must be registered and filed.

- b) 调查：员工应当积极配合调查程序并提供准确、全面的信息。对于违规或拒不配合调查的行为，公司将作出纪律处分等相应处理。调查人员须做好过程记录和档案管理。

Investigation: Employees are expected to actively cooperate with the investigation process and provide accurate and comprehensive information. For actions that violate regulations or refuse to cooperate with the investigation, the company will take disciplinary action and other corresponding measures. Investigators must maintain records of the process and manage the files properly.

- c) 处理：经初步核实确有违纪者，需追究相应责任的，内控管理部应当召集监督委员会，呈报相应证据及书面调查报告，由委员会出具处理意见。

Processing: If preliminary verification confirms that there are disciplinary violations, and corresponding responsibilities need to be pursued, the Internal Control Management Department shall convene the Supervision Committee, submit the relevant evidence and written investigation report, and have the committee provide processing opinions.

- d) 对于可能涉及刑事犯罪的行为，委员会有权将案件向公安机关报案，并将案件提交公安机关处理。

For actions that may involve criminal offenses, the committee has the authority to report the case to the public security authorities and submit the case for handling by the public security organs.

5.2.3 禁止打击报复 Prohibition of Retaliation

- 5.2.3.1 廉洁自律监督委员会等知悉举报信息的全部人员，应对举报人和拒收贿赂人员的一切信息，予以保密。

All personnel of the Integrity and Self-Discipline Supervision Committee and others who are aware of the report information must keep all information about the reporter and those who refuse to accept bribes confidential.

- a) 对被举报信息有管辖权的部门和个人，应当按照各自职责互相配合、依法受理举报，共同做好保护举报人和拒收贿赂人员合法权益的工作。

Departments and individuals with jurisdiction over the reported information should cooperate with each other according to their respective responsibilities, accept reports in accordance with the law, and work together to protect the legitimate rights and

interests of the reporters and those who refuse to accept bribes.

- b) 严禁将举报人的任何信息透露给被举报人和贿赂人员或被举报部门；被举报人是部门负责人的，不得将举报材料转给该负责人所在部门。违反前款规定者，应给予纪律处分；构成犯罪的，依法追究刑事责任。

It is strictly forbidden to disclose any information about the reporter to the reported person and the person offering bribes or the department being reported. If the reported person is a department head, the report materials must not be transferred to the department where the responsible person is located. Those who violate the provisions of the preceding paragraph shall be subject to disciplinary action; if a crime is constituted, they shall be held criminally responsible according to the law .

- 5.2.3.1 打击报复投诉举报人，包括纵容、包庇或收买、指使他人对举报人实施侵害，公司将追究相应的责任，涉嫌犯罪的，移交司法机关处理。

Retaliating against complainants and whistleblowers, including indulging, shielding, or bribing, or instructing others to harm the whistleblowers, the company will hold the responsible parties accountable. If a crime is suspected, the case will be handed over to the judicial authorities for processing .

- 5.2.3.2 投诉举报人因投诉举报而受到纪律处分或其他不公正待遇的，公司将予以纠正。投诉举报人的人身安全受到威胁时，公司将及时采取保护措施。因投诉举报造成投诉举报人及其亲属的名誉、财产受到侵害的，投诉举报人有权要求侵权人停止侵害、赔礼道歉、赔偿损失。投诉举报人也可向法院起诉。

If a complainant or whistleblower suffers disciplinary action or other unfair treatment as a result of their complaint or report, the company will correct the situation. If the personal safety of a complainant or whistleblower is threatened, the company will take timely protective measures. If the complaint or report causes damage to the reputation or property of the complainant or whistleblower and their relatives, the complainant or whistleblower has the right to demand that the infringer cease the infringement, apologize, and compensate for the losses. The complainant or whistleblower may also file a lawsuit with the court.

- 5.2.3.3 对违反上述投诉举报人保护规定的，应当视情节轻重，公司将严肃处理，负有管理职责的部门负责人，一并接受相应惩处。造成严重后果构成犯罪的，依法追究刑事责任。

For violations of the aforementioned protection regulations for complainants and whistleblowers, depending on the severity of the circumstances, the company will deal with the matter seriously. Department heads with management responsibilities will also be subject to corresponding penalties. If serious consequences are caused and a crime is constituted, criminal responsibility will be pursued according to the law.

5.3 利益冲突管理 Conflict of Interest Management

5.3.1 定义 Definitions

5.3.1.1 本准则中“利益冲突”指员工履行工作职责时可能会影响其客观决策和行为的个人或家庭利益关系。

In these guidelines, “conflict of interest” refers to personal or family interest relationships that may affect an employee’s objective decision-making and behavior when performing their job responsibilities.

5.3.1.2 典型情形，例如：

Typical situations, for example:

a) 利用职位便利为个人或他人谋取不当利益。

Using one’s position for personal or others’ improper benefits.

b) 与公司利益相关的事项中，存在直接或间接经济利益关联。

Having direct or indirect economic interest involvement in matters related to the company’s interests.

c) 在外部投资、兼职或其他活动中，可能损害公司利益的行为。

Engaging in external investments, part-time jobs, or other activities that may harm the company’s interests.

5.3.2 管理原则 Management Principles

5.3.2.1 透明原则：员工需主动披露与公司事务相关的潜在利益冲突。

Transparency Principle: Employees must proactively disclose potential conflicts of interest related to company affairs

5.3.2.2 回避原则：利益冲突方不得参与相关事务的讨论、决策或执行。

Recusal Principle: Parties with conflicts of interest shall not participate in discussions, decision-making, or execution related to the matters in question

5.3.2.3 合规原则：所有行为须符合公司规章制度及法律法规要求。

Compliance Principle: All actions must comply with the company’s rules and regulations as well as legal and statutory requirements.

5.3.3 管理机制 Management Mechanism

5.3.3.1 申报机制 Declaration Mechanism

a) 员工入职时需根据人力资源部门要求，按规定进行利益冲突申报，详细说明潜在利益冲突事项。

Upon joining the company, employees must declare potential conflicts of interest in accordance with the requirements of the Human Resources department and the regulations, providing detailed information about potential conflicts of interest.

b) 员工在发现自身可能涉及利益冲突时，应立即向直属上级或内控管理部门报告，并填写《诚信廉洁（&利益冲突）自检表》（路径：企业微信-工作台-云表单-公共数据源）

When an employee becomes aware that they may be involved in a conflict of interest, they should immediately report to their direct supervisor or the Internal Control Management Department and complete the “Integrity and Conflict of Interest Self-Check Form” (path:

Wecom -Workbench-Cloud Form-Public Data)

- c) 内控管理部每年会根据风险评估情况，抽样一定数量的员工进行利益冲突问卷调查。收到问卷的员工，须如实报告说明潜在利益冲突事项。

The Internal Control Management Department will conduct a conflict of interest questionnaire survey among a certain number of employees based on risk assessment each year. Employees who receive the questionnaire must report potential conflicts of interest truthfully.

5.3.3.2 审查与处理 Review and Handling

- a) 由内控管理部审核申报内容。

The Internal Control Management Department reviews the declared content.

- b) 协同人力资源部门，根据严重性，采取提醒、监督、回避或终止合作等措施。

In conjunction with the Human Resources department, measures such as reminders, supervision, recusal, or termination of cooperation will be taken based on the severity.

5.3.4 违规处罚 Penalties for Violations

- 5.3.4.1 纪律处分：对未按规定申报或隐瞒利益冲突的员工，视情节轻重予以处分。

Disciplinary Action: Employees who fail to declare or conceal conflicts of interest will be disciplined according to the severity of the case.

- 5.3.4.2 法律责任：若利益冲突行为导致公司损失或违法，将依法追究法律责任。

Legal Responsibility: If the conflict of interest behavior results in company losses or illegal actions, legal responsibility will be pursued according to the law.

5.4 反腐败与反贿赂 Anti-Corruption and Anti-Bribery

5.4.1 定义 Definition

- 5.4.1.1 本准则中“贿赂”指直接或间接地向企业或公共部门的任何人员提议、承诺、给予、授权给予或收受金钱或其他任何有价值物，以不当地影响收受方的正当职责或行为，获取或保持业务或商业行为中的其他不当利益。

In this guideline, "bribery" refers to the direct or indirect offering, promising, giving, authorizing the giving, or accepting of money or any other valuable item to improperly influence the recipient's proper duties or actions, in order to obtain or retain business or other undue advantages in business conduct.

5.4.2 反腐败反贿赂要求 Anti-Corruption and Anti-Bribery Requirements

- 5.4.2.1 旭创科技始终坚持公平、诚信和透明地在全球开展业务，致力于营造诚信廉洁的商业环境，在反腐败反贿赂领域，公司全体员工和商业伙伴必须做到：

Innolight Technology (Assuming this is the name of the company) is committed to conducting business globally with fairness, integrity, and transparency, and is dedicated to fostering a business environment of integrity and clean governance. In the field of anti-corruption and anti-bribery, all employees and business partners of the company must:

a) 坚决遵守业务所在国或地区所适用的反贿赂法律法规；

Strictly comply with the anti-bribery laws and regulations applicable in the countries or regions where business is conducted;

b) 避免不正当竞争行为；

Avoid improper competitive practices

c) 尊重当地的风俗习惯与商业惯例。

Respect local customs, habits, and business practices.

5.4.2.2 旭创科技对任何形式的贿赂行为“零容忍”。无论何时、何地，我们在与客户、商业伙伴和政府部门、公共组织的交往中，都应该秉承诚信、透明、廉洁的行为准则。

Innolight Technology has a “zero-tolerance” policy towards any form of bribery. Whenever and wherever we interact with customers, business partners, government departments, and public organizations, we should adhere to the code of conduct that is honest, transparent, and clean.

5.4.3 行为规范 Code of Conduct

5.4.3.1 公司禁止贿赂、回扣或任何形式的腐败。

The company prohibits bribery, kickbacks, or any form of corruption

5.4.3.2 员工不得直接或间接地向任何个人、实体或组织给予、承诺或索取、收受任何不当利益：

Employees must not directly or indirectly give, promise, or demand or accept any improper benefits from any individual, entity, or organization:

a) 甄选供应商时，应秉持诚信与公正原则，选择产品或服务在品质、价格与交货期等各方面均具有竞争力的供应商。

When selecting suppliers, integrity and fairness should be upheld, choosing suppliers whose products or services are competitive in terms of quality, price, and delivery.

b) 禁止关联交易行为，员工及其关联人（包括但不限于直系亲属、三代以内旁系亲属、近姻亲、同学、同事等关系密切或具有利害关系，以及可能导致公司利益转移的其他关系的企业和个人）不得与供应商成立公司或参股供应商公司，以及向供应商收取回扣或其它任何形式的不正当利益。

Related party transactions are prohibited. Employees and their affiliates (including but not limited to direct relatives, collateral relatives within three generations, in-laws, classmates, colleagues, and other individuals or enterprises with close relationships or conflicts of interest, as well as those that may lead to the transfer of company interests) must not establish companies with suppliers or hold shares in supplier companies, nor accept kickbacks or any other form of undue benefits from suppliers.

c) 未得到部门主管及管理层批准，不得接受旅游、高消费娱乐、旅游风景区开会招待。

Without the approval of the department head and management, employees must not accept travel, high-end entertainment, or hospitality at tourist attractions.

- d) 公司不以提供礼品或招待作为维系商业关系的基础。当地商业惯例或礼仪确有需要时，应遵守以下原则：

The company does not base business relationships on the provision of gifts or entertainment. When local business customs or etiquette require it, the following principles should be observed:

- e) 提供礼品或招待应有合理的商业目的，且规格、标准应符合当地商业习惯，不得违反当地法律及公司制度；

The provision of gifts or entertainment should have a legitimate business purpose, and the scale and standards should comply with local business practices and not violate local laws and company policies;

- f) 禁止对外提供可能被视为贿赂、回扣、佣金或不当利益的贵重礼品、招待；

It is prohibited to provide valuable gifts or entertainment that could be considered as bribery, kickbacks, commissions, or undue benefits;

- g) 根据公司在必要时完成礼品或招待的事前审批并保存好记录。

Complete pre-approval for gifts or entertainment as required by company regulations when necessary and keep good records.

- 5.4.4 公司鼓励员工抵制贿赂，并为此提供支持和保护。保护拒绝参与行贿或腐败的任何人或善意举报已经发生的或即将发生的任何实际或潜在受贿或腐败行为的任何人免于遭受任何不利待遇。不利待遇包括开除、处分、威胁或与举报有关的其他不利待遇。若员工或第三方代表认为自身遭到任何此等对待，应立即向公司内控管理部上报有关情况，公司将立刻采取保护措施。

The company encourages employees to resist bribery and provides support and protection for doing so. It protects anyone who refuses to participate in bribery or corruption, or who reports in good faith any actual or potential acts of bribery or corruption that have occurred or are about to occur, from any adverse treatment. Adverse treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment related to the report. If an employee or a third party representative believes they have suffered any such treatment, they should immediately report the situation to the company's Internal Control Management Department, which will take immediate protective measures.

5.5 礼品、礼金和招待 Gifts, Cash Gifts, and Hospitality

5.5.1 概述 Overview

- 5.5.1.1 提供适当的礼品和进行必要的款待有助于和商业伙伴建立良好的合作关系。然而，若是为了对某项决策施加影响或为了谋求不当利益而赠送礼品或进行款待，则有悖商业道德。旭创科技处理原则为：相关人员可以提供与其工作相关的恰当、合法的商务礼品和款待，但前提是该礼品和款待涉及的价值在正常范围内，而且不会被视为或有合理理由被怀疑为影响接受方的决策或者判断。

Providing appropriate gifts and necessary entertainment can help establish good cooperative relationships with business partners. However, giving gifts or entertainment to influence

a decision or seek undue benefits is contrary to business ethics. Innolight Technology's handling principle is: relevant personnel can provide proper and legal business gifts and entertainment related to their work, provided that the value of the gifts and entertainment is within the normal range and will not be seen as or reasonably suspected of influencing the recipient's decision or judgment.

5.5.2 行为规范 Code of Conduct

5.5.2.1 客户、供应商礼品赠送及接收原则

Principles for Gift Giving and Receiving with Customers and Suppliers

- a) 与客户、供应商等商业伙伴间的礼品赠送, 不得逾越正常的礼尚往来标准, 不得利用礼品赠送使得送礼者获得优待、获得业务、享受更好的价格或更优惠条件。

Gift giving between business partners such as customers and suppliers should not exceed the standard of normal reciprocity and should not be used to gain preferential treatment, business, better prices, or more favorable terms for the giver.

- b) 获得部门经理以及总经理批准后, 可在重大节日时视情形向商业伙伴赠送礼品。同一商业伙伴全年累积赠送礼品金额原则上不应超过 5000 元, 全年不应超过 3 次, 单次赠送礼品金额不应超过 2000 元。

With the approval of the department manager and general manager, gifts may be given to business partners on significant holidays as circumstances allow. The total amount of gifts given to the same business partner in a year should not exceed 5,000 yuan in principle, not more than 3 times a year, and not more than 2,000 yuan per occasion.

- c) 公司员工原则上不予接受商业伙伴的馈赠(包括但不限于现金、礼品、卡券等任意形式)。因商业礼仪无法当面拒绝或退回的礼品或礼金, 每位员工全年累计不应超过 5000 元, 全年不应超过 3 次, 单次不得超过 2000 元, 超过者, 则有行贿受贿之嫌。单次超过 1000 元的需上报人力资源部门处理。

Company employees are generally not allowed to accept gifts from business partners (including but not limited to cash, gifts, vouchers, or any other form). If it is not possible to refuse or return gifts or cash due to business etiquette, each employee should not exceed a total of 5,000 yuan in a year, not more than 3 times a year, and not more than 2,000 yuan per occasion. Exceeding these limits may suggest bribery and corruption. Any amount exceeding 1,000 yuan per occasion must be reported to the Human Resources department for handling.

- d) 单个商业伙伴馈赠公司员工(无论单人或多人), 全年累计不得超过 5000 元, 每人每次不得超过 2000 元。

The total amount of gifts given by a single business partner to company employees (whether to one person or multiple people) should not exceed 5,000 yuan in a year, and should not exceed 2,000 yuan per person per occasion.

- e) 国家(地区)文化、习惯、消费水平差异等因素可能导致当地的“礼尚往来标准”与上述规定存在差

异，此情形下，金额标准调整需要经过公司财务部门进行合规性审核。

Differences in national (regional) culture, customs, and consumption levels may lead to differences in local "standards of reciprocity" compared to the above regulations. In such cases, adjustments to the monetary standards require compliance review by the company's finance department.

5.5.2.2 员工及第三方代表不得报复拒收礼品、拒绝行贿的任何个人。

Employees and third-party representatives must not retaliate against any individual who refuses to accept gifts or refuses to engage in bribery.

5.6 反欺诈与公平竞争 Anti-Fraud and Fair Competition

5.6.1 反欺诈 Anti-Fraud

5.6.1.1 我们在经营中始终坚持诚信透明的态度，不参与任何形式的欺诈行为。公司严禁故意使用欺骗手段谋取经济或私人利益、逃避责任义务或给相关方造成损失的欺诈行为。欺诈的形式有多种，例如：

We consistently maintain a stance of integrity and transparency in our operations and do not engage in any form of fraudulent activities. The company strictly prohibits the intentional use of deceptive means to seek economic or personal benefits, evade responsibilities and obligations, or cause losses to relevant parties. There are various forms of fraud, for example:

a) 故意向公司或商业伙伴提供虚假、误导性或不完整的信息；

Intentionally providing false, misleading, or incomplete information to the company or business partners;

b) 篡改、伪造或未经授权更改工作记录；

Tampering with, forging, or unauthorizedly altering work records

c) 明知或应知相关行为属于欺诈，而仍然予以支持或协助等。

Knowingly or should have known that the relevant actions constitute fraud, yet still supporting or assisting in such actions.

5.6.2 公平竞争 Fair Competition

5.6.2.1 反垄断法与反不正当竞争法旨在保护消费者和市场免受不公平商业行为的侵害，维护良性竞争环境。公司遵循相应法律法规，坚持自由、公平、诚信的商业竞争。我们反对通过违法或不道德的业务活动获取竞争优势，反对通过不正当手段获取其他公司的商业秘密信息。

Antitrust laws and unfair competition laws aim to protect consumers and the market from unfair business practices and maintain a healthy competitive environment. The company complies with the corresponding laws and regulations, adheres to free, fair, and honest business competition. We oppose obtaining a competitive advantage through illegal or unethical business activities and oppose obtaining other companies' trade secret information through improper means.

5.6.3 行为规范 Code of Conduct

5.6.3.1 处理客户事宜时，应当：

When handling customer matters, one should:

- a) 遵守并支持客户的诚信廉洁要求，不行贿，不关联，透明公开，信守承诺；

Comply with and support the customer's integrity and clean governance requirements, not engage in bribery, not be related, be transparent and open, and keep promises;

- b) 不得利用公司赋予的职权，影响或干扰公司各项业务，或从中牟取私利；

Not use the authority granted by the company to influence or interfere with the company's various businesses, or to seek private benefits;

- c) 员工及其关联人不得向客户收取回扣或其它任何形式的不正当利益；

Employees and their affiliates must not accept kickbacks or any other form of undue benefits from customers.

- d) 禁止与友商的串通投标、合谋定价及垄断等一切不合规行为。

Collusion in bidding, price fixing, and monopolistic practices with competitors are strictly prohibited.

5.6.3.2 处理竞争事宜时，应当：

When handling competitive matters, one should:

- a) 禁止公司层面与其它公司达成垄断协议、滥用市场支配地位、具有或者可能具有排除、限制竞争效果的行为等共谋行为。

Prohibit the company from reaching monopolistic agreements with other companies, abusing market dominance, or engaging in conspiratorial activities that have or may have the effect of excluding or restricting competition.

- b) 禁止公司销售部门达成类似固定或者变更商品价格、限制购买新技术新设备或者限制开发新技术新产品、联合抵制交易等垄断协议。

Prohibit the company's sales department from reaching monopolistic agreements such as fixing or changing commodity prices, restricting the purchase of new technologies and equipment, or restricting the development of new technologies and products, and jointly boycotting transactions.

- c) 禁止从事以不公平的高价销售商品或者以不公平的低价购买商品、“没有正当理由，以低于成本的价格销售商品”、“没有正当理由搭售商品，或者在交易时附加其他不合理的交易条件”等滥用市场支配地位的行为。

Prohibit engaging in practices that abuse market dominance, such as selling goods at unfairly high prices or buying goods at unfairly low prices, "selling goods at prices below cost without justifiable reason," "tying the sale of goods without justifiable reason, or attaching other unreasonable trading conditions."

- d) 公司通过合同等方式取得对其他公司的控制权或者能够对其他公司施加决定性影响时，并且公司集中达到国家规定的申报标准的，公司应当事先向国家反垄断执法机构申报，未申报的不得实施集中。

When the company acquires control over another company or can exert a decisive influence through contracts or other means, and the concentration reaches the reporting standards set by the state, the company must report to the national antitrust enforcement agency in advance. Concentrations not reported are not allowed to be implemented.

- e) 禁止公司与个人层面共谋勾结, 包括但不限于采购环节的共谋勾结、生产环节共谋勾结、销售环节的共谋勾结、财务环节共谋勾结等。

Prohibit collusion and conspiracy at the company and individual levels, including but not limited to collusion in procurement, production, sales, and financial processes.

5.7 其他重要行为准则规范 Other Important Code of Conduct Regulations

5.7.1 信息安全及保密 Information Security and Confidentiality

5.7.1.1 旭创科技作为科技公司, 创新、技术和知识产权对公司发展至关重要。有关公司业务的一切信息, 未经授权公开, 均应视为保密信息, 包括但不限于公司的商业计划、财务状况、内部通信、组织架构、运营信息、人员信息等, 也包括公司根据合作协议承诺不对外公开的第三方的保密信息。不得向公司外部人员或第三方披露保密信息, 也不应在公共场所讨论保密信息。保密信息在公司内仅有限定范围人员知晓, 除非其他人为履行工作职责所需且已获得授权, 否则不得向第三人披露该保密信息。

As a technology company, innovation, technology, and intellectual property are crucial to the development of Innolight Technology. All information related to the company's business, unless authorized for public disclosure, should be considered confidential, including but not limited to the company's business plans, financial conditions, internal communications, organizational structure, operational information, personnel information, etc., as well as confidential information of third parties that the company has promised not to disclose under cooperation agreements. Confidential information must not be disclosed to external personnel or third parties, nor should it be discussed in public places. Confidential information is known only to a limited scope of personnel within the company, and it must not be disclosed to third parties unless others need it to perform their job responsibilities and have been authorized.

5.7.2 贸易合规 Trade Compliance

5.7.2.1 公司一视同仁要求所有员工必须遵守法律、公司政策和《贸易合规手册》中的相关规定, 否则将受到相应的纪律处分。

The company equally requires all employees to comply with laws, company policies, and the provisions of the Trade Compliance Manual, and will be subject to corresponding disciplinary action if they fail to do so.

5.7.2.2 公司开放多种贸易合规举报和上升渠道, 严肃调查任何违反适用的贸易法规、公司合规政策, 或可能直接或间接导致公司违反适用的贸易法规的潜在违规行为。相关行为一经查实, 公司将严厉追究相关责任人, 并及时启动补救机制。举报专线: trade.compliance@innolight.com。

The company provides various channels for trade compliance reporting and escalation, and will seriously investigate any violations of applicable trade regulations, company compliance policies, or potential violations that may directly or indirectly lead to the company violating applicable trade regulations. Once such actions are verified, the company will severely hold the responsible parties accountable and promptly initiate remedial mechanisms. Reporting hotline: trade.compliance@innolight.com.

5.7.3 内幕交易 Insider Trading

5.7.3.1 员工工作中可能会接触到公司、客户或商业伙伴的重要非公开信息。其中，对交易及市场会产生重要影响的非公开信息属于“内幕信息”。在掌握公司内幕信息的情况下进行股票交易，或者将内幕信息传递给他人并利用该信息交易的行为，均属于内幕交易。相关行为不仅违反公司政策，而且涉嫌违法，可能承担法律责任。

Employees may come into contact with important non-public information about the company, customers, or business partners during their work. Non-public information that can significantly affect transactions and the market is considered "insider information." Engaging in stock trading while in possession of company insider information, or passing on insider information to others and using that information for trading, are both considered insider trading. Such actions not only violate company policy but also may be illegal, potentially incurring legal liability.

5.7.4 工作氛围 Work Environment

旭创科技致力于创造一个相互尊重、多元友善、健康向上的工作环境和氛围，禁止以下行为：

Innolight Technology is committed to creating a work environment and atmosphere that is respectful, diverse, friendly, and healthy. The following behaviors are prohibited:

- a) 利用公司赋予的职权，与下属或与公司有业务往来的人员有金钱往来（包括但不限于赌博）、暧昧关系等不正当行为；

Using the authority granted by the company to engage in financial transactions (including but not limited to gambling), ambiguous relationships, or other improper conduct with subordinates or individuals with whom the company has business dealings;

- b) 推荐、选拔人才任人唯亲、拉帮结派；

Selecting and promoting talents based on nepotism or forming cliques;

- c) 任何形式的歧视、霸凌、骚扰或性骚扰。（该原则适用于所有与工作相关的场景，包括但不限于与同事、客户和商业伙伴的接触与互动）

Any form of discrimination, bullying, harassment, or sexual harassment. (This principle applies to all work-related scenarios, including but not limited to interactions with colleagues, clients, and business partners.)

5.7.5 公司资产 Company Assets

5.7.5.1 保护公司资产的行为规范：

Code of Conduct for Protecting Company Assets::

- a) 员工应妥善保管并合理使用公司资产, 包括但不限于资金、设备、物资、信息资源和知识产权;

Employees should properly manage and reasonably use company assets, including but not limited to funds, equipment, materials, information resources, and intellectual property;

- b) 公司资产仅限于为工作目的使用, 未经授权不得用于个人用途;

Company assets are intended solely for work purposes and should not be used for personal use without authorization;

- c) 严禁任何形式的侵占、挪用、盗窃、毁坏或私自出售公司资产的行为;

Any form of embezzlement, misappropriation, theft, destruction, or unauthorized sale of company assets is strictly prohibited;

- d) 严禁利用职务便利占用公司资金、设备或资源谋取个人利益;

Using one's position to occupy company funds, equipment, or resources for personal gain is strictly prohibited;

- e) 员工有责任维护公司资产的安全性, 防止丢失、损坏或被非法使用;

Employees have the responsibility to maintain the security of company assets and prevent loss, damage, or illegal use;

- f) 发现资产被损坏、丢失或潜在侵占行为, 应及时向主管部门或上级报告。

If assets are found to be damaged, lost, or if there is potential embezzlement behavior, it should be reported promptly to the relevant department or superior.

5.7.5.2 对于蓄意破坏公司资产、将资产用于非法目的、没有尽到保管义务或放任损失扩大的行为, 公司将依据相关法律法规及公司制度, 追究责任, 严重者移交司法机关处理, 并保留追偿的权利。

For intentional destruction of company assets, use of assets for illegal purposes, failure to fulfill custody duties, or allowing losses to expand, the company will pursue responsibility according to relevant laws, regulations, and company policies. In severe cases, the matter will be referred to judicial authorities for handling, and the company reserves the right to seek compensation.

5.8 奖惩措施 Rewards and Punishments

5.8.1 奖励 Rewards

5.8.1.1 举报违反廉洁自律准则者, 经查证属实, 将予以适当经济奖励。

Those who report violations of the integrity and self-discipline guidelines will be given appropriate financial rewards if the report is verified to be true.

5.8.1.2 依据举报情节之大小, 按照《员工奖惩制度》给予非物质奖励, 并予年底绩效加分。

Based on the significance of the reported violation, non-material rewards will be given according to the "Employee Rewards and Punishments System," and additional points will be added to the year-end performance assessment.

5.8.2 处罚 Penalties

5.8.2.1 违反廉洁自律准则的行为，一经查实，将对违反廉洁自律准则者、督导不利者和包庇者，按照公司奖惩制度进行处罚。

Once a violation of the integrity and self-discipline guidelines is verified, penalties will be imposed on the violators, those who failed to supervise effectively, and those who cover up the violations, in accordance with the company's reward and punishment system.

5.8.2.2 自首处理 Self-reporting treatment

a) 有违反廉洁自律准则之事实，事后自首且未对公司利益造成损失者，可以减轻或免除其处分；

Individuals who have violated the integrity and self-discipline guidelines and later self-report without causing damage to the company's interests may have their punishment reduced or waived;

b) 集体违反廉洁自律准则者，对第一位自首人员且未对公司利益造成损失者，可以免除其处分。

In cases of collective violations of the integrity and self-discipline guidelines, the first individual to self-report without causing damage to the company's interests may have their punishment waived.

5.9 培训宣贯 Training and Communication

5.9.1 培训宣贯是旭创科技构建廉洁自律准则体系的重要一环。为提升全员廉洁自律意识和能力，我们不定期开展各类主题培训。

Training and communication is an essential part of Innolight Technology's construction of an integrity and self-discipline guideline system. To enhance the awareness and ability of all employees for integrity and self-discipline, we conduct various themed training sessions on an irregular basis.

5.9.2 我们不定期通过内部邮件、企业通讯工具等向员工提供相关法律法规、案例及公司政策的宣贯。

We periodically provide employees with communication on relevant laws, regulations, case studies, and company policies through internal emails and corporate communication tools.

5.9.3 内控管理部作为公司层面代表，每年根据实际选择一定数量供应商等商业伙伴进行拜访，以及通过邮件推送的方式，向商业伙伴宣导公司《廉洁自律准则》中相关的条款。

As the company-level representative, the Internal Control Management Department annually selects a certain number of suppliers and other business partners to visit and communicates the relevant clauses of the company's "Integrity and Self-Discipline Guidelines" to them through email pushes.

5.10 持续监督与改进 Continuous Supervision and Improvement

5.10.1 内控管理部持续评估廉洁自律风险，并将廉洁自律问题的审计调查纳入审计工作范围。

The Internal Control Management Department continuously assesses the risks of integrity and self-discipline and includes audits and investigations of integrity and self-discipline issues within the scope of audit work.

5.10.2 鉴于各地法律体系不尽相同，若本准则与当地法律法规之间存在不一致，请以更严格的要求和当地法

律法规为准。公司也将定期审阅准则，并为适应法律法规的变化或公司发展作出相应的修订。

Given that legal systems vary by location, if there is any inconsistency between these guidelines and local laws and regulations, the stricter requirements and local laws and regulations shall prevail. The company will also regularly review the guidelines and make corresponding revisions to adapt to changes in laws and regulations or the development of the company.

6.0 附件：Appendices:

无

None

7.0 参考文件：Reference Documents

7.1 《820-5010 员工奖惩制度》

820-5010 Employee Rewards and Punishments System

7.2 《820-9098 供应商诚信廉洁合作协议-中文版》

820-9098 Supplier Integrity and Clean Governance Cooperation Agreement - Chinese Version

7.3 《820-9099 供应商诚信廉洁合作协议-中英文版》

820-9099 Supplier Integrity and Clean Governance Cooperation Agreement - Simplified Chinese and English Version

8.0 定义：Definitions

无

None