

《投诉与举报管理规定》

Complaint and Reporting Management Regulations

厦门海辰储能科技股份有限公司

Xiamen HithiumEnergy Storage Technology Co., Ltd.

1. 目的 Purpose

在我们的核心价值观中，诚信运营与商业道德是不可妥协的基石。海辰储能深知，一个健康、透明且充满信任的生态系统需要每一位利益相关方的共同维护。本制度旨在公开宣示我们对任何违规行为的“零容忍”态度，并建立一个公开、公正、高效且受到绝对保护的投诉举报解决机制。本政策经董事会授权制定，由董事会战略与可持续发展委员会审阅并批准通过。董事会作为公司合规治理的最高决策与监督机构，对本规定的有效推行提供最终的政策支持与资源保障。

In our core values, integrity operations and business ethics are uncompromising cornerstones. Hithium deeply understand that a healthy, transparent, and trust-filled ecosystem requires the joint maintenance of every stakeholder. This policy aims to publicly declare our "zero tolerance" attitude towards any compliance violations, and to establish an open, fair, efficient, and absolutely protected complaint and reporting resolution mechanism. This Policy is formulated under the authorization of the Board of Directors, and has been reviewed and approved by the Strategy and Sustainability Committee of the Board of Directors. As the highest decision-making and supervisory body for the Company's compliance governance, the Board of Directors provides the ultimate policy support and resource guarantees for the effective implementation of these provisions.

海辰储能不仅无条件欢迎并支持大家在发现问题时积极发声，更承诺为所有挺身而出维护正义与合规的发声者提供全方位的坚实后盾。

Hithium not only unconditionally welcome and support everyone to actively speak up upon discovering issues, but also commit to providing comprehensive and solid backing for all whistleblowers who step forward to uphold justice and compliance.

2. 适用范围 Scope of application

我们深信，合规没有边界。只要任何利益相关方觉得有任何需要报告、反映或申诉的事项，无论您身处何地，我们都随时倾听您的声音：

We firmly believe that compliance has no boundaries. As long as any stakeholder feels

there are any matters needing to be reported, reflected, or appealed, regardless of where you are located, we are always ready to listen to your voice:

内部同仁：全体在职员工、前员工、应聘者、实习生、劳务派遣人员、咨询顾问及各级管理层。

Internal Colleagues: All current employees, former employees, candidates, interns, dispatched labor personnel, consultants, and management at all levels.

商业伙伴与供应链：供应商、分包商、服务商、客户、合资伙伴以及他们各自的全体同仁或关联第三方。

Business Partners and Supply Chain: Suppliers, subcontractors, service providers, customers, joint venture partners, as well as all their respective colleagues or affiliated third parties.

外部社会力量：我们运营所在地的本地社区居民、社会组织（NGO）、行业协会及任何关注并获取公司违规线索的第三方。

External Social Forces: Local community residents where we operate, social organizations (NGOs), industry associations, and any third party that follows and obtains clues regarding the Company's compliance violations.

3. 术语定义 Definitions

为了全面预防和消除潜在风险，我们不设任何议题壁垒。只要您认为存在问题，均可随时向我们提起申诉或举报，包括但不限于以下领域：

To comprehensively prevent and eliminate potential risks, we set no topic barriers. As long as you believe an issue exists, you may raise an appeal or report to us at any time, including but not limited to the following areas:

商业道德与诚信宣示：任何形式的贪污贿赂、索贿受贿、挪用公款、利益冲突、不当商业招待、反洗钱、反不正当竞争及商业秘密泄露。

Business Ethics and Integrity Declaration: Any form of corruption and bribery, soliciting and accepting bribes, misappropriation of public funds, conflicts of interest, improper business entertainment, money laundering, unfair competition, and the leakage of trade secrets.

人权与尊重劳工：任何形式的职场歧视、职业骚扰（包括性骚扰与职场霸凌）、强迫劳动、使用童工、违规延长工时、薪酬福利不公、不尊重结社自由及对安全健康工作环境的破坏。

Human Rights and Respect for Labor: Any form of workplace discrimination, occupational harassment (including sexual harassment and workplace bullying), forced labor, use of child labor, illegal extension of working hours, unfair compensation and benefits, disrespect for freedom of association, and destruction of a safe and healthy working environment.

绿色运营与 ESG 责任：非法排放污染物、危险废物违规处置、虚假环保披露、耗能数据造假、破坏生物多样性、冲突矿产使用及其他违反运营所在地环境法规的行为。

Green Operations and ESG Responsibility: Illegal discharge of pollutants, non-compliant disposal of hazardous waste, false environmental disclosures, falsification of energy consumption data, destruction of biodiversity, use of conflict minerals, and other behaviors violating environmental regulations in the locations of operation.

阳光采购与供应链规范：采购招标舞弊、串标标底泄露、供应商资质造假、供应商违反《商业伙伴行为准则》、商业敲诈及供应链中的劳工剥削。

Transparent Procurement and Supply Chain Norms: Procurement bidding fraud, collusive bidding and bid base leakage, falsification of supplier qualifications, suppliers violating the "Business Partner Code of Conduct", commercial extortion, and labor exploitation in the supply chain.

其他违规与潜在风险：违反公司各项规章制度、损害公司资产安全、财务欺诈、数据隐私泄露以及任何其他可能损害公司、员工或社会公共利益的行为。

Other Violations and Potential Risks: Violations of various company rules and regulations, damage to the safety of company assets, financial fraud, data privacy breaches, and any other behaviors that may harm the Company, employees, or public interests.

4. 职责 Responsibilities

跨职能独立审查：各常设调查部门在开展调查时拥有绝对的独立调查权，直接向管理层或董事会报告，任何业务部门及高管均不得干预或施加影响。

Cross-functional Independent Review: The permanent investigating departments possess absolute independent investigative powers when conducting investigations, reporting directly to the management or the Board of Directors, and no business departments or senior executives may intervene or exert influence.

完备的利益冲突回避：若报告内容涉及调查部门自身、该部门负责人或关键决策者，该案件将自动触发风险回避机制，移交至完全独立的第三方审计机构或由董事会直接授权的独立联合调查组处理。

Comprehensive Conflict of Interest Avoidance: If the report content involves the investigating department itself, the head of the department, or key decision-makers, the case will automatically trigger a risk avoidance mechanism and be transferred to a completely independent third-party audit institution or an independent joint investigation team directly authorized by the Board of Directors for handling.

5. 管理措施 Management Measures

5.1 您的隐私与匿名权受到绝对尊重

Absolute Respect for Your Privacy and Right to Anonymity

坚固的保密屏障：我们对您的姓名、联系方式、报告内容、调查过程及所有相关资料实施最严阶的加密与权限控制。除非取得您的明确书面同意，或属于司法机关强制要求的法定披露情形，否则我们严禁向任何第三方（包括被举报人及其所属业务部门）透露任何可直接或间接识别您身份的信息。

Solid Confidentiality Barrier: We implement the strictest encryption and access control over your name, contact information, report content, investigation process, and all related materials. Unless explicit written consent is obtained from you, or it falls under statutory disclosure circumstances mandated by judicial authorities, we strictly prohibit disclosing any information that could directly or indirectly identify you to any third party (including the respondent and their affiliated business departments).

畅通的匿名双向沟通：我们鼓励实名沟通，但同样无条件接收并重视匿名报告。

我们通过独立的数字化加密平台，在完全隐匿您 IP 地址和网络身份的前提下，由专人与您进行“双向、持续、可追溯”的沟通，并实时向您更新案件进展。

Unimpeded Anonymous Two-way Communication: We encourage real-name communication, but equally unconditionally accept and highly value anonymous reports. Through an independent digital encrypted platform, under the premise of completely hiding your IP address and online identity, designated personnel will engage in "two-way, continuous, and traceable" communication with you, and update you on the case progress in real time.

5.2 坚决捍卫发声者，对打击报复“零容忍”

Resolutely Defending Whistleblowers, "Zero Tolerance" for Retaliation

善意发声的安全保障：只要您是基于合理理由相信所报告的违规事实在当时具有真实性（即善意举报），即使后续调查证实该事项并未构成违规，您、您的协助者及利益关联人也均受到本制度的全面保护。您不会因善意发声而承担任何民事、行政或劳动法律责任，亦免受任何违反保密协议的追责。

Security Guarantee for Good-faith Whistleblowing: As long as you have reasonable grounds to believe that the reported violation facts were true at the time (i.e., good-faith reporting), even if subsequent investigations confirm the matter does not constitute a violation, you, your assistants, and related stakeholders are fully protected by this policy. You will not bear any civil, administrative, or labor legal liabilities for speaking up in good faith, nor will you be subject to any accountability for breaching confidentiality agreements.

严厉惩治报复行为：我们严厉禁止任何形式的直接或间接打击报复行为（包括降薪、调岗、解雇、绩效恶意打低、职场孤立、恐吓威胁等）。任何此类行为一经查实，将被定性为重大恶意违纪，公司将对报复实施者予以最严厉的纪律处分，直至解除劳动合同；涉嫌违法犯罪的，依法移送司法机关。

Severely Punishing Retaliatory Acts: We strictly prohibit any form of direct or indirect retaliation (including salary reduction, transfer, dismissal, malicious downgrading of performance, workplace isolation, intimidation, and threats, etc.). Once any such

behavior is verified, it will be classified as a major malicious disciplinary violation, and the Company will impose the most severe disciplinary actions on the retaliator, up to the termination of the employment contract; those suspected of illegal crimes shall be transferred to judicial authorities according to law.

6. 沟通受理渠道 Communication and Acceptance Channels

6.1 内部常设受理渠道

Internal Permanent Acceptance Channels

6.1.1 审计监察中心（反舞弊、反腐败、采购违规专用）

Audit and Supervision Center (Dedicated to Anti-fraud, Anti-corruption, and Procurement Violations)

电子邮箱: hcjb@hithium.com

Email: hcjb@hithium.com

沟通专线: 18059223808

Communication Hotline: 18059223808

6.1.2 法务与合规中心（违反国际法规、反垄断、数据安全、重大 ESG 合规风险专用）

Legal and Compliance Center (Dedicated to Violations of International Regulations, Anti-monopoly, Data Security, and Major ESG Compliance Risks)

电子邮箱: HC-Compliance@hithium.com

Email: HC-Compliance@hithium.com

6.1.3 人力资源中心（员工关系、劳资纠纷、职场歧视与不公专用）

Human Resources Center (Dedicated to Employee Relations, Labor Disputes, Workplace Discrimination, and Injustice)

数智平台: Hiro - 转 HR 人工客服

Digital Intelligence Platform: Hiro - Transfer to HR Manual Customer Service

总裁直通邮箱: jc@hithium.com

President's Direct Mailbox: jc@hithium.com

6.1.4 EHS 部与安全保卫部（职业健康、生产安全、环境保护违规、人身骚扰专

厦门市火炬高新区同翔高新城海辰产业园
HiTHIUM Industrial Park, Tongxiang High-Tech Zone
Xiamen, Fujian, China

www.hithium.com
0592-5513735
hithium@hithium.com

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EHS and Security Department (Dedicated to Occupational Health, Production Safety, Environmental Protection Violations, and Personal Harassment)

EHS 邮箱: HC-EHS@hithium.com

EHS Email: HC-EHS@hithium.com

6.1.5 安保指挥中心 Security Command Center

0592-7219110 / 飞书工作台 “海辰 110” 0592-7219110 / Feishu Workspace

"Hithium 110"

6.1.6 ESG 管理部与采购管理部 (供应链尽职调查举报与申诉专用)

ESG Management Department and Procurement Management Department (Dedicated to Supply Chain Due Diligence Reporting and Complaint Mechanism)

邮箱: HC-SRC-SCM@hithium.cn

Email: HC-SRC-SCM@hithium.cn

6.2 外部独立合规举报渠道

External Independent Compliance Reporting Channels

6.2.1 独立第三方托管数字化举报平台 (完全匿名、24 小时、支持多语种)

Independent Third-party Hosted Digital Reporting Platform (Completely Anonymous, 24-hour, Multi-language Supported)

访问网址由外部独立专业安全合规供应商托管, 平台在物理和网络层面上独立于公司内网, 不记录任何网络痕迹)

Website: Hosted by an external independent professional security and compliance supplier; the platform is physically and logically independent from the Company's intranet and records no network traces)

6.2.2 外部独立合规邮寄地址

External Independent Compliance Mailing Address

收件人: 海辰储能总部 - 法务与合规中心总合规官 (密件)

Recipient: Hithium Headquarters - Chief Compliance Officer of the Legal and Compliance Center (Confidential)

7. 常态化的合规培训与文化建设 **Normalized Compliance Training and Cultural Construction**

我们深信，与其在问题发生后进行查处，不如在需要申诉和举报之前，就赋予大家识别风险与合规发声的能力。公司全面建立“事前预防型”的常态化合规培训与沟通机制。

We firmly believe that rather than investigating and punishing after a problem occurs, it is better to empower everyone with the ability to identify risks and speak up for compliance before there is a need to appeal or report. The Company has comprehensively established an "ex-ante preventive" normalized compliance training and communication mechanism.

7.1 内部员工的常态化合规赋能

Normalized Compliance Empowerment for Internal Employees

入职第一课：所有新入职同仁在办理入职的 30 个工作日内，必须接受至少 1 课时的商业道德、劳动人权与举报保护政策培训，确保人人知晓自身权利与发声渠道。

First Lesson upon Onboarding: All newly onboarded colleagues must receive at least 1 hours of training on business ethics, labor and human rights, and reporting protection policies within 30 working days of onboarding, ensuring everyone is aware of their rights and whistleblowing channels.

年度全员刷新：各级管理层与全体同仁每年须定期完成至少一次的合规与 Speak-up（合规发声）专题培训，并通过线上合规考核，考核结果纳入年度个人绩效。

Annual Refresher for All Employees: Management at all levels and all colleagues must regularly complete at least one special training on compliance and Speak-up annually, and pass the online compliance assessment, with the assessment results incorporated into the annual personal performance.

关键岗位精准渗透：针对采购、销售、财务、HR、供应链管理等高风险岗位的同
仁，进行量身定制的防舞弊、反垄断、人权保障及反敲诈深度案例培训。

Precise Penetration for Key Positions: For colleagues in high-risk positions such as
procurement, sales, finance, HR, and supply chain management, customized in-depth
case training on anti-fraud, anti-monopoly, human rights protection, and anti-extortion
will be conducted.

7.2 外部供应链与商业伙伴的延伸培训

Extended Training for External Supply Chain and Business Partners

准入前合规宣贯：在与供应商、分包商、服务商等商业伙伴正式建立合作关系前，
公司主动向其全面宣贯本制度及《商业伙伴行为准则》，并在合作协议中明确知
悉本投诉举报机制。

Pre-admission Compliance Promotion: Before formally establishing a cooperative
relationship with business partners such as suppliers, subcontractors, and service
providers, the Company proactively and comprehensively promotes this policy and the
"Business Partner Code of Conduct" to them, and explicitly acknowledges this
complaint and reporting mechanism in the cooperation agreement.

供应商年度联合培训：公司每年利用供应商大会、专题工作坊或线上培训平台，
定期组织供应商管理层及一线员工开展全覆盖的 ESG、商业道德与申诉渠道培训，
帮助商业伙伴在需要前建立健全自身的合规防火墙。

Annual Joint Training for Suppliers: The Company uses annual supplier conferences,
thematic workshops, or online training platforms to regularly organize full-coverage
ESG, business ethics, and appeal channel training for supplier management and
frontline employees, helping business partners establish and perfect their own
compliance firewalls before the need arises.

8. 规范化的闭环处理流转流程 **Standardized Closed-loop Processing and Workflow**

为确保每一件流入的投诉举报都能获得无差别、规范化的专业处理，我们承诺按照以下标准化矩阵流程实施闭环管理。

To ensure that every incoming complaint and report receives non-discriminatory and standardized professional handling, we commit to implementing closed-loop management according to the following standardized matrix process.

注：若遇跨境、极度复杂的重大疑难案件确实无法在 15 天时限内结案的，经合规负责人批准后方可延期，且调查部门必须每隔 7 天主动向发声者同步当前的调查最新进展状态。

Note: In the event of cross-border, extremely complex, and major difficult cases that truly cannot be closed within the 15-day time limit, an extension may be granted upon approval by the Head of Compliance, and the investigating department must proactively synchronize the latest investigation progress status with the whistleblower every 7 days.

9. 积极的奖惩机制 **Active Reward and Punishment Mechanism**

为了在全生态圈中积极营造“敢于发声、崇尚诚信”的合规文化，我们实施“正向激励与严肃惩戒”并重的手段。

In order to actively create a compliance culture of "daring to speak up and advocating integrity" throughout the entire ecosystem, we implement measures that place equal emphasis on "positive incentive and strict disciplinary action".

9.1 荣誉奖励与合规贡献激励

Honorary Awards and Compliance Contribution Incentives

我们设立专项激励机制，全面表彰并奖励为维护生态健康做出贡献的发声者：

We have established a special incentive mechanism to comprehensively commend and reward whistleblowers who have contributed to maintaining the health of the ecosystem:

9.1.1 精神荣誉表彰对于实名报告且查实的同仁，在征得其明确书面同意、确保绝对安全的前提下，由公司合规委员会颁发荣誉证书，或在企业合规微刊中进行匿名事迹表彰。在同仁的绩效考核与晋升评定中，同等条件下优先考虑其合规贡献。

For colleagues whose real-name reports have been verified, under the premise of

obtaining their explicit written consent and ensuring absolute safety, the Company's Compliance Committee will issue honorary certificates, or anonymously commend their deeds in the corporate compliance micro-magazine. In the performance assessment and promotion evaluation of colleagues, priority will be given to their compliance contributions under equal conditions.

9.1.2 物质与经济奖励对于报告一般违规违纪、成功帮助公司堵塞管理漏洞的, 视其消除的潜在风险等级, 给予 500 元至 10000 元不等的现金或等值实物奖励。

For reporting general violations and disciplinary offenses, successfully helping the Company close management loopholes, cash or equivalent material rewards ranging from 500 RMB to 10,000 RMB will be given, depending on the level of potential risks eliminated.

对于报告重大舞弊、贪腐、严重破坏环境或侵犯人权事件, 成功挽回公司直接经济损失或避免重大行政处罚的, 经合规委员会审批, 可按照实际挽回经济损失金额的 0.5% 给予专项合规贡献奖金, 最高不超过 2 万元。

For reporting major fraud, corruption, severe environmental destruction, or human rights violation events, successfully recovering direct economic losses for the Company or avoiding major administrative penalties, upon approval by the Compliance Committee, a special compliance contribution bonus of 0.5% of the actual economic losses recovered may be granted, with a maximum of no more than 20,000 RMB.

外部商业伙伴的共赢激励: 若供应商或分包商的员工报告查实违规的, 除上述经济奖励外, 公司可将该供应商的优秀合规表现纳入“绿色供应商评级”, 在同等商务条件下优先续约或增加采购份额。

Win-win Incentive for External Business Partners: If employees of a supplier or subcontractor report verified non-compliance, in addition to the above financial rewards, the Company may incorporate the supplier's excellent compliance performance into the "Green Supplier Rating", and prioritize contract renewal or increase procurement share under equal commercial conditions.

9.2 严肃问责与恶意诬告惩处

Strict Accountability and Punishment for Malicious False Accusations

对违规者的严肃问责：根据违规严重程度，分别给予口头警告、书面警告、记过、降职降薪、解除劳动合同等纪律处分；若其违规行为给公司造成经济损失，公司保留追偿的权利；涉嫌犯罪的，依法移送司法机关。

Strict Accountability for Violators: Depending on the severity of the violation, disciplinary actions such as verbal warning, written warning, demerit recording, demotion and salary reduction, and termination of the employment contract will be given respectively; if the violation causes economic losses to the Company, the Company reserves the right to seek recourse; those suspected of committing crimes shall be transferred to judicial authorities according to law.

管理层管理连带责任：若业务部门内部存在系统性、长期的违规行为，或部门负责人对违规迹象知情不报、故意掩盖的，对该部门管理层实施管理连带责任问责，扣减绩效奖金并通报批评。

Joint Management Responsibility of Management: If systematic and long-term violations exist within a business department, or if the head of the department knows about the signs of violations but fails to report them or deliberately covers them up, joint management responsibility accountability will be implemented for the management of that department, with performance bonuses deducted and a circulated notice of criticism.

恶意诬告惩处澄清：我们全面捍卫基于合理怀疑的善意漏报；但若经查实，有人故意编造虚假事实、伪造证据对他人进行恶意构陷或诬告的，属于重大违纪行为。公司将对诬告者给予严厉纪律处分直至解除劳动合同，并无条件为受到诬告的清白同仁进行公开澄清与名誉恢复。

Punishment and Clarification for Malicious False Accusations: We fully defend good-faith reporting based on reasonable suspicion; however, if it is verified that someone intentionally fabricates false facts or forges evidence to maliciously frame or falsely accuse others, it constitutes a major disciplinary offense. The Company will impose severe disciplinary actions on the false accuser up to the termination of the employment

contract, and unconditionally provide public clarification and reputation restoration for innocent colleagues who have been falsely accused.

10. 数据留存、商业秘密与持续改进 Data Retention, Trade Secrets, and Continuous Improvement

10.1 数据保护与安全流转

Data Protection and Secure Workflow

所有沟通记录、访谈笔录及调查证据必须存放在相互隔离、独立加密的合规数据库中。在案件完成闭环且超出境内外地方法定合规留存期限后，调查部门必须对系统及纸质档案中的所有个人特征信息实施永久性的、不可逆的匿名化脱敏处理。

All communication records, interview transcripts, and investigation evidence must be stored in isolated and independently encrypted compliance databases. After the case is closed in a loop and exceeds the statutory compliance retention period of domestic and overseas localities, the investigating department must implement permanent and irreversible anonymization and desensitization processing on all personal characteristic information in the system and paper files.

10.2 商业秘密与合规发声的平衡

Balance between Trade Secrets and Compliance Whistleblowing

我们严禁任何调查人员将调查过程中获取的公司技术或商业秘密用于该项调查之外的任何目的。同时，若发声者为了揭露严重违反国际法、环保指令或人权红线的恶性违规行为，在善意且必要的范围内获取或引用了相关内部文件，不视为侵犯商业秘密，公司不对其提起民事或劳动诉讼。

We strictly prohibit any investigator from using the Company's technical or trade secrets obtained during the investigation for any purpose other than that investigation. At the same time, if a whistleblower, in order to expose vicious violations that severely violate international law, environmental directives, or human rights red lines, obtains or quotes relevant internal documents within a good-faith and necessary scope, it will not be considered an infringement of trade secrets, and the Company will not file civil

or labor lawsuits against them.

10.3 定期审查与制度演进

Regular Review and System Evolution

在完全匿名化的前提下，通报发声件数、违规分类趋势、调查时限达标率及整改关闭率。我们将根据年度实践需求，以及我们全球业务版图的扩张情况，至少每年对本制度的有效性进行一次穿透式评审，确保我们的合规架构始终走在国际前列。

Under the premise of complete anonymization, the report shall notify the number of whistleblowing cases, trends in violation classification, compliance rate of investigation time limits, and rectification closure rate. Based on annual practical needs and the expansion of our global business footprint, we will conduct a penetrative review of the effectiveness of this policy at least once a year to ensure that our compliance architecture always remains at the forefront internationally.

厦门海辰储能科技股份有限公司

Xiamen Hithium Energy Storage Technology Co., Ltd.

2025 年 10 月

October 2025