

高景太阳能申诉、投诉与举报管理政策

Gokin Solar Grievance, Complaint and Reporting Management Policy

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1. 目的与依据 Purpose and Basis

为保障本公司环境、社会及治理（ESG）管理体系的有效运行，切实维护员工及利益相关方的合法权益，建立畅通、公正、保密、非报复性的申诉与举报渠道，确保所有涉及商业道德、腐败行为、劳工人权、职业健康安全、环境保护等议题的关切、投诉或举报均能得到及时受理、客观调查与有效处理，特制定本政策。

To ensure the effective operation of the Company's Environmental, Social and Governance (ESG) management system, genuinely safeguard the legitimate rights and interests of employees and stakeholders, and establish accessible, fair, confidential and non-retaliatory grievance and reporting channels, ensuring that all concerns, complaints or reports related to business ethics, corrupt practices, labor and human rights, occupational health and safety, environmental protection and other topics are promptly received, objectively investigated and effectively handled, this Policy is hereby formulated.

本政策参考了国际劳工组织（ILO）公约、SA8000标准、联合国全球契约组织（UNGC）十项原则等国际标准，并结合本公司实际情况制定。

This Policy is formulated with reference to international standards such as the International Labour Organization (ILO) Conventions, the SA8000 standard, the Ten Principles of the United Nations Global Compact (UNGC), and in consideration of the Company's actual situation.

2. 适用范围 Scope of Application

本政策适用于高景太阳能股份有限公司及其子公司的任何利益相关方，包括但不限于：

This Policy applies to any stakeholders of Gokin Solar Co., Ltd. and its subsidiaries, including but not limited to:

- 本公司所有董事、高级管理人员、全体员工（包括全职员工、兼职员工、劳务派遣员工、实习生等）；
- 本公司的服务提供商、供应商、分包商、代理商及其他商业合作伙伴；
- 本公司的客户、社区居民及社会公众。
- All directors, senior management and all employees of the Company (including full-time employees, part-time employees, dispatched employees, interns, etc.);
- Service providers, suppliers, subcontractors, agents and other business partners of the Company;
- Customers, community residents and the general public of the Company.

本政策涵盖的申诉、投诉与举报事项包括但不限于：

The grievances, complaints and reports covered by this Policy include but are not limited to:

- 腐败、贿赂、索贿、便利费、敲诈勒索、贪污挪用、洗钱等商业道德违规行为；
- 利益冲突未申报或未回避；
- 童工、强迫劳动、人口贩卖、歧视、骚扰等劳工人权侵犯行为；
- 职业健康与安全违规行为；
- 环境污染、危险废物违规处置等环境违规行为；
- 财务造假、信息泄露、内幕交易等其他违反法律法规或公司政策的行为。
- Business ethics violations such as corruption, bribery, solicitation of bribes, facilitation payments, extortion, embezzlement, misappropriation, money laundering, etc.;
- Failure to declare or recuse from conflicts of interest;
- Labor and human rights violations such as child labor, forced labor, human trafficking, discrimination, harassment, etc.;
- Occupational health and safety violations;
- Environmental violations such as environmental pollution, illegal disposal of hazardous waste, etc.;
- Financial fraud, information leakage, insider trading and other violations of laws, regulations or company policies.

3. 申诉、投诉与举报渠道 Grievance, Complaint and Reporting Channels

本公司设立多元化、可及的申诉、投诉与举报渠道，内外部利益相关方可通过以下任一渠道，以实名或匿名方式提出申诉、投诉或举报：

The Company has established diversified and accessible grievance, complaint and reporting channels. Internal and external stakeholders may submit grievances, complaints or reports through any of the following channels, either by real-name or anonymously:

- 1) 电子邮箱 Email: shenjibu@gokin.com
- 2) 举报电话/短信 Hotline/SMS: 15692038078
- 3) 举报微信 Reporting WeChat: gokinsolarshenji1209
- 4) 官方公众号 Official WeChat Account: 高景股份、金湾高景、四川高景、青海高景、广州高景 → “联系我们” → “举报渠道” Gokin Solar Co., Ltd., Jinwan Gokin, Sichuan Gokin, Qinghai Gokin, Guangzhou Gokin → “Contact Us” → “Reporting Channel”

5) 二维码举报平台 QR Code Reporting Platform:

(详见公司内部公告及宣传栏 See internal announcements and bulletin boards)



6) 信函 Correspondence: 广东省珠海市金湾区三灶镇湖滨路1566号高景太阳能股份有限公司审计委员会 (收) Audit Committee of Gokin Solar Co., Ltd., No. 1566 Hubin Road, Sanzao Town, Jinwan District, Zhuhai City, Guangdong Province, China

7) 实体信箱 Physical Mailbox: 各基地“举报信箱”(食堂、车间等) “Report Mailbox” at each base (canteen, workshop, etc.)

4. 申诉、投诉与举报受理流程 Grievance, Complaint and Reporting Handling Process

4.1 接收与登记 Receipt and Registration

审计部是本公司申诉、投诉与举报的统一归口管理部门。审计部指派专人负责各举报渠道的日常维护、信息接收及初步登记。

The Audit Department is the unified centralized management department for grievances, complaints and reports of the Company. The Audit Department designates dedicated personnel responsible for the daily maintenance of each reporting channel, information reception and preliminary registration.

对收到的申诉、投诉与举报, 须在3个工作日内完成登记, 并录入保密台账。举报人身份信息与举报内容分别登记, 分别保管。

Received grievances, complaints and reports shall be registered within 3 working days and entered into a confidential ledger. The reporter's identity information and the content of the report shall be registered separately and stored separately.

4.2 受理与分派 Acceptance and Assignment

接收到举报材料后，审计部应及时研究材料内容，在 5 个工作日内 完成初步审查，确定是否受理，并向实名举报人反馈初步审查结果（匿名举报除外）。

Upon receiving the reporting materials, the Audit Department shall promptly study the content and complete a preliminary review within 5 working days to determine whether to accept the case, and inform the real-name reporter of the preliminary review result (anonymous reports excluded).

4.2.1 受理条件 Conditions for Acceptance:

- 1) 事项属于本政策第2条规定的范围;
 - 2) 提供可核查的初步事实依据或线索;
 - 3) 非恶意诬告、捏造事实。
- 1) The matter falls within the scope defined in Article 2 of this Policy;
 - 2) Verifiable preliminary factual basis or leads are provided;
 - 3) It is not a malicious false accusation or fabricated fact.

4.2.2 不予受理条件 Conditions for Non-Acceptance:

- 1) 不属于受理范围;
 - 2) 无事实依据或明显不实;
 - 3) 已进入司法程序且无新的事实依据;
 - 4) 恶意诬告、捏造事实。
- 1) The matter does not fall within the scope of acceptance;
 - 2) No factual basis or clearly untrue;
 - 3) Already subject to judicial proceedings with no new factual basis;
 - 4) Malicious false accusation or fabricated fact.

对于不予受理的实名举报，应向举报人说明理由。确认属于本部门受理的，将委派专人跟进调查；确认属于其他部门受理的，将在遵循保密原则下移交相关部门处理。

For real-name reports that are not accepted, the reasons shall be explained to the reporter. If it falls under the department's purview, a dedicated person will be assigned to follow up on the investigation; if it falls under another department's purview, it will be transferred to the relevant department for handling in accordance with the principle of confidentiality.

4.3 调查与处理 Investigation and Handling

4.3.1 调查程序 Investigation Procedures

- 一般事项：15个工作日内完成调查。
- 复杂事项：经审计部负责人批准可延长至30个工作日，并告知举报人延期理由。
- 重大事项（涉及董事、监事、高级管理人员，或涉及童工、强迫劳动、重大腐败、群体性事件等）：须在24小时内向董事会审计委员会报告，由审计委员会决定是否成立特别调查小组。

- General matters: Investigation shall be completed within 15 working days.
- Complex matters: With the approval of the head of the Audit Department, the period may be extended to 30 working days, and the reporter shall be informed of the reason for the extension.
- Major matters (involving directors, supervisors, senior management, or involving child labor, forced labor, major corruption, mass incidents, etc.): Shall be reported to the Audit Committee of the Board within 24 hours, and the Audit Committee shall decide whether to establish a special investigation team.

4.3.2 调查方式：文件查阅、人员访谈、现场观察、数据分析，必要时委托第三方专业机构协助调查。

4.3.2 Investigation methods: Document review, personnel interviews, on-site observation, data analysis, and when necessary, entrusting third-party professional institutions to assist in the investigation.

4.3.3 调查结论 Investigation Conclusions

- 事项属实：出具《调查处理决定书》，明确处理措施及整改要求；
- 事项不实：向实名举报人说明依据并终止调查；
- 恶意诬告：视情节追究相关人员责任（详见第7条）。
- If the matter is substantiated: A “Investigation Handling Decision Letter” shall be issued, specifying handling measures and rectification requirements;
- If the matter is unsubstantiated: The basis shall be explained to the real-name reporter and the investigation shall be terminated;
- Malicious false accusation: The responsibility of the relevant personnel shall be pursued based on the circumstances (see Article 7 for details).

4.4 结果反馈 Result Feedback

对于实名举报，无论是否立案调查，审计部均应在调查完结后的7个工作日内向举报人反馈

调查处理结果，并听取举报人意见。如举报人对调查结果有异议，审计部应记录在案并向审计部负责人汇报。

For real-name reports, regardless of whether an investigation is initiated, the Audit Department shall provide feedback on the investigation results to the reporter within 7 working days after the investigation is completed, and listen to the reporter's opinions. If the reporter disagrees with the investigation results, the Audit Department shall record it and report to the head of the Audit Department.

对于匿名举报，审计部视情况决定是否反馈调查结果。

For anonymous reports, the Audit Department shall decide whether to provide feedback on the investigation results based on the circumstances.

4.5 后续跟踪 Follow-up Tracking

审计部应对申诉、投诉与举报的处理结果进行持续跟踪，确保所采取的整改措施得到有效执行，且无打击报复情形出现。相关处理意见在管理层审批确认后，发送至被举报人进行最终确认。所有受理、调查、处理过程均以书面文件与电子文件形式留存，做到一案一档。

The Audit Department shall continuously track the implementation of grievance, complaint and report handling results to ensure that the rectification measures adopted are effectively executed and that no retaliation occurs. Relevant handling opinions shall be sent to the reported person for final confirmation after management approval. All acceptance, investigation and handling processes shall be retained in both written and electronic documents, ensuring one case, one file.

5. 举报人保护（无报复政策） Whistleblower Protection (Non-Retaliation Policy)

5.1 保密原则 Confidentiality Principles

本公司对所有举报信息及举报人信息严格保密：

The Company maintains strict confidentiality for all reporting information and reporter information:

- 1) 信息分离：举报人身份信息与举报内容分别登记，举报人信息由审计部授权的专人严格保密保管，非必要且非特别授权人员无权查阅；
- 2) 知情范围：严格控制调查过程中的信息知悉范围，仅限调查必需人员；
- 3) 材料管理：举报材料及调查过程文件按“机密”级管理，电子文档设置访问权限，纸质文档存放于加锁文件柜；

4) 严禁泄密：严禁将举报材料转到被举报人手中，严禁违规泄露举报人信息。

1) Information Segregation: The reporter's identity information and the content of the report shall be registered separately. The reporter's information shall be kept strictly confidential by a person authorized by the Audit Department and stored securely. Personnel without necessity and specific authorization shall not have access;

2) Scope of Knowledge: The scope of information knowledge during the investigation process shall be strictly controlled, limited only to personnel necessary for the investigation;

3) Material Management: Reporting materials and investigation process documents shall be managed as "confidential." Electronic documents shall have access permissions set, and paper documents shall be stored in locked file cabinets;

4) Strict Prohibition of Disclosure: It is strictly prohibited to transfer reporting materials to the reported person, and strictly prohibited to illegally disclose reporter information.

5.2 禁止打击报复（零容忍） Prohibition of Retaliation (Zero Tolerance)

本公司对任何形式的打击报复行为持“零容忍”态度。严禁任何组织或个人对举报人、证人、协助调查人员实施任何形式的打击报复。

The Company maintains a "zero-tolerance" stance towards any form of retaliation. No organization or individual is permitted to engage in any form of retaliation against reporters, witnesses or personnel assisting in investigations.

被禁止的打击报复行为包括但不限于：

Prohibited retaliatory acts include but are not limited to:

- 解雇、降职、停职或威胁解雇；
- 扣减工资、奖金或福利；
- 不公正的绩效评估或工作分配；
- 骚扰、恐吓、欺凌或威胁；
- 诽谤、侮辱或歧视；
- 排除在会议或活动之外；
- 工作中的冷处理或不合理对待；
- 任何其他形式的不利对待。
- Termination, demotion, suspension or threat of termination;

- Reduction of wages, bonuses or benefits;
- Unfair performance evaluation or work assignment;
- Harassment, intimidation, bullying or threats;
- Defamation, insult or discrimination;
- Exclusion from meetings or activities;
- Cold treatment or unreasonable treatment at work;
- Any other form of adverse treatment.

一旦核实存在打击报复行为，本公司将 从严从重处理 涉事人员，包括但不限于解除劳动合同、终止合作关系，并依法追究其法律责任。

Once retaliation is verified, the Company will deal with the involved personnel strictly and severely, including but not limited to termination of employment, termination of cooperative relationships, and pursuit of legal liability in accordance with the law.

5.3 举报人权利 Reporter's Rights

举报人享有以下权利：

Reporters have the following rights:

- 有权选择实名或匿名举报；
- 有权要求对举报信息保密；
- 有权在遭受打击报复时提出申诉；
- 实名举报并查实的，有权获得相应奖励。
- The right to choose real-name or anonymous reporting;
- The right to request confidentiality of reporting information;
- The right to file a grievance when subjected to retaliation;
- The right to receive corresponding rewards for substantiated real-name reports.

6. 举报奖励机制 Reporting Reward Mechanism

为激励本公司内外部利益相关方参与监督举报，本公司对实名举报并经查实的举报人给予适当奖励。

To encourage internal and external stakeholders to participate in supervision and reporting, the Company provides appropriate rewards to real-name reporters whose reports are substantiated.

6.1 类型及办法 Types and methods.

类型 Type	范围 Scope	奖励办法 Reward Method
职务侵占 Position Embezzlement	公司人员互相勾结，监守自盗，将交付管理、经手、使用的财物据为己有 Company personnel conspired with each other, engaged in embezzlement, and appropriated assets that were entrusted to them for management, handling, and use.	按照坎级计算法计算 Calculated according to tiered calculation method
营私舞弊 Self-serving Fraud	伪造资料及数据、虚构及隐瞒事实、挪用公款、泄露机密 Fabrication of information and data, fabrication and concealment of facts, misappropriation of public funds, and disclosure of confidential information.	按照人次或金额任选其一计算 Calculated based on either number of persons involved or amount
贪污受贿 Corruption and Bribery	利用职务便利索取或非法收受他人财物 Abusing one's official position to solicit or unlawfully accept property from others.	按照受贿金额的10%计算，最低2000元，最高30000元 Calculated at 10% of the bribery amount, minimum RMB 2,000, maximum RMB 30,000
吃拿卡要 Extortion and Favoritism	刁难供应商及下属索要红包、礼物、借款等 Harassing suppliers and subordinates by demanding red envelopes, gifts, loans, and other favors.	一次性奖励1000元 One-time reward of RMB 1,000

类型 Type	范围 Scope	奖励办法 Reward Method
人情交易 Favor-based Transactions	接受供应商及下属的招待、吃喝、娱乐等 Accepting hospitality, meals, entertainment, and other forms of entertainment provided by suppliers and their subordinates.	一次性奖励 1000 元 One-time reward of RMB 1,000
其他 Others	虚假报销、信息泄露、恶意扰乱秩序等其他影响较大的行为 False claims for reimbursement, data breaches, malicious disruptions of order, and other significant offenses.	2000 元至 30000 元不等 RMB 2,000 to RMB 30,000

6.2 奖励标准（坎级算法） Reward Standards (Tiered Calculation Method):

挽回金额 Amount Recovered (RMB)	占比 Percentage	奖金 Bonus (RMB)
最低限额 Minimum	—	1,000
20,000	10%	2,000
20,000	12.5%	2,500
20,000	13%	2,600
40,000	15%	6,000
50,000	18%	9,000
39,000	20%	7,800
最高限额 Maximum	—	30,000

6.3 奖励范围 Reward Scope:

- 1) 举报奖励对象原则上限于 实名举报人 或单位；
- 2) 两人以上（含两人）联名举报同一案件的，按同一举报奖励，奖金由举报人协商分配；

- 3) 对恶意诬告、捏造事实的，不予奖励并追究责任。
- 1) Reward recipients are limited to real-name reporters or entities in principle;
- 2) For joint reports by two or more persons (including two) on the same case, it shall be rewarded as a single report, and the bonus shall be distributed among the reporters through negotiation;
- 3) Those who make malicious false accusations or fabricate facts shall not be rewarded and shall be held accountable.

7. 诬告处理 Handling of False Accusations

举报人应对举报内容的真实性负全责。举报人存在以下行为的，将依法依规追究责任：

Reporters shall bear full responsibility for the truthfulness of the content they report. If a reporter engages in the following acts, they shall be held accountable in accordance with laws and regulations:

- 1) 故意歪曲、捏造事实，诬告陷害他人的；
 - 2) 恶意夸大事实，造成严重不良影响的；
 - 3) 以举报为名进行敲诈勒索的。
- 1) Intentionally distorting or fabricating facts to falsely accuse others;
 - 2) Maliciously exaggerating facts, causing serious adverse effects;
 - 3) Engaging in extortion under the guise of reporting.

对内部人员存在上述行为的，本公司将按照相关规定予以纪律处分，包括但不限于警告、记过、降职、解除劳动合同；涉嫌违法的，移送司法机关处理。对外部人员存在上述行为的，本公司保留追究其法律责任或终止合作关系的权利。

If internal personnel engage in the above acts, the Company will impose disciplinary actions in accordance with relevant regulations, including but not limited to warnings, demerits, demotion, termination of employment; if suspected of illegality, the matter will be referred to judicial authorities. If external personnel engage in the above acts, the Company reserves the right to pursue legal liability or terminate cooperative relationships.

8. 修订与审阅 Revision and Review

本政策由本公司解释与修订，以确保其有效性和时效性，并根据公司实际运营情况与法律法规的变化适时进行修订或更新。一般情况下，本政策 每年修订或更新一次。本政策以中文和

英文版本制备，若中英文版本不一致，以中文版本为准。

This Policy shall be interpreted and revised by the Company to ensure its effectiveness and timeliness, and shall be revised or updated as necessary based on the Company's actual operating conditions and changes in laws and regulations. Generally, this Policy is revised or updated annually.

This Policy is prepared in both Chinese and English versions. In case of any discrepancy between the two versions, the Chinese version shall prevail.