

## 长电科技投诉和举报人保护政策

### JCET Complaint and Whistleblower Protection Policy

#### 1、Purpose 目的

为了规范投诉和举报人保护工作，规定相应的标准和程序以保证按照公司政策以及可适用的法律法规保密、及时、客观、公正地保护员工、第三方和利益相关者，防止其因善意举报而遭受打击报复，特制定本制度。

This Policy is formulated to standardize complaints and the protection for whistleblower, the Company establishes corresponding standards and procedures to ensure that employees, third parties and stakeholders are protected in a confidential, prompt, objective, and impartial manner in accordance with the Company's policies and applicable laws and regulations, and prevent them from retaliation resulted from their good faith report.

#### 2、Scope 范围

本制度适用于江苏长电科技股份有限公司（“长电科技总部”）及其在中国境内外分、子公司（“长电科技下属公司”）（统称为“长电集团”或“公司”）的所有董事会成员、高管、全体职员、非全职员工和实习生（统称为“员工”）。

This Policy applies to all the board members, management, full-time employees, part-time employees and interns (collectively “employees”) of JCET Group Co., Ltd. (“JCET Headquarters”) and its wholly-owned and controlling (or participating) subsidiaries (“JCET Subsidiaries”) inside and outside the PRC (collectively “JCET Group” or “the Company”).

#### 3、Whistleblowers Procedures 举报程序

(1) 公司鼓励投诉和举报人（以下简称“举报人”）基于善意原则对公司某部门或个人，以及顾问、代理人、承包商、供应商、投标单位或者与公司有业务关系的其他单位或个人，甚至包括竞争对手（以下简称“第三方”）的违纪、违法以及犯罪的行为，进行公司内部举报，其举报权利、保密性及其他合法权益受法律保护。

The Company encourages complainants and whistleblowers (hereinafter referred to as "Whistleblowers"), based on the principle of good faith, to internally report the violations of laws and regulations and criminal actions of a department or an individual of the Company, as well as consultants, agents, contractors, suppliers, bidders or other entities or individuals that have business relations with the Company, even including the competitors (hereinafter referred to as "third parties"). The Whistleblowers' right to report, confidentiality and other

legitimate rights and interests are protected by law.

(2) 本制度所指违纪、违法以及犯罪的行为主要包括：

Violations of discipline and law and criminal acts under this Policy mainly include:

- 任何公司及个人未能遵守任何法律、法规及违背监管义务的行为；
- Any company or individual' s behavior that fails to comply with any laws, regulations and breaches the regulatory obligations
- 任何员工从事不道德或者违反公司的《商业道德行为准则》、内部控制制度或其他政策，包括但不限于反腐败和反舞弊制度、商业秘密保护和管理制度、招标采购制度、供应商管理制度等；
- That any employee engages in unethical behaviors or violates the Company's Code of Conduct and Business Ethics, internal control policy or other policies, including but not limited to anti-corruption and anti-fraud policy, trade secret protection and management policies, bidding and procurement policies, supplier management policy, etc.;
- 任何员工或第三方有不诚信、欺诈、腐败、贿赂、侵犯商业秘密或知识产权、不遵守保密义务、职务侵占、盗窃、以权谋私、公器私用、冲突利益、在外兼职，内幕交易等侵害公司权益的行为；
- That any employee or third party engages in behaviors that damage the rights and interests of the Company, such as dishonesty, fraud, corruption, bribery, infringement of trade secrets or intellectual property rights, non-compliance with confidentiality obligations, embezzlement, theft, use of his/her position for personal gain, use of the Company' s equipment for personal purposes, conflicts of interest, part-time jobs, insider trading, etc.;
- 任何员工或第三方在公司场所有暴力、胁迫、骚扰、迫害、公开羞辱、苛刻、辱骂、开黄腔、或歧视的行为；
- That any employee or third party commits any acts of violence, coercion, harassment, persecution, public humiliation, harshness, abuse, sexual explicitness, or discrimination within the workplace of the Company;
- 任何员工或第三方提供误导性或欺骗性的信息给公司导致公司会计、财务报告或审计工作所出具的报告出现问题；
- That any employee or third party provides misleading or deceptive information to the Company, which causes problems in the Company' s accounting, financial reporting or auditing reports;

- 任何员工或第三方可能损害公司、员工、客户或商业伙伴利益的行为，包括但不限于工作方式不安全、破坏公司环境、破坏食堂卫生、引起健康风险、不遵守防疫规定、造成厂区安全隐患、引起公安事件或者任何人有浪费公司财产及资源的行为；
- Any act of any employee or third party that may damage the interests of the Company, its employees, customers or business partners, including but not limited to unsafety of working methods, damage to the environment of the Company, damage to the canteen' s hygiene, causing health risks, non-compliance with epidemic prevention regulations, causing safety hazards in the factory area, causing public security incidents, or any waste of the Company' s property and resources;
- 任何可能给公司造成经济损失、名誉损失，或者给公司造成其他损害的事件、人员或行为；
- Any event, person or behavior that may cause economic loss, loss of reputation, or other damage to the Company;
- 涉及任何其他类型的严重违纪、违法以及犯罪行为，包括在公司酗酒、酒驾、在厂区禁烟处抽烟等；
- Any other types of serious misconducts, illegal and criminal acts, including excessive drinking in the Company, driving under the influence of alcohol, smoking in the non-smoking factory area, etc.;
- 其它损害公司、部门或员工利益的一切言行，如未经公司授权在媒体上或社交媒体上发表不合适或不正当言论，或任何违反公司规章制度的言行，无论其后果是否已经产生；以及
- All other words and deeds that impair the interests of the Company, departments or employees, such as inappropriate or improper remarks in the media or social media without the authorization of the Company, or any words and deeds that violate the Company' s rules and regulations, regardless of whether consequences have already occurred; and
- 对任何上述行为的有意隐瞒、欺骗或包庇的行为。
- Intentional concealment, deception or cover-up any of the foregoing behaviors.

#### **4、Receiving and Handling of Complaints or Reports 投诉或举报事项的接收及处理**

公司设立有下列三种方式受理投诉和举报：

The Company has set up the following three ways to accept complaints and reports:

- 举报邮箱，由公司内审负责管理，接收公司内外部实名或匿名的投诉或举报事项。举报邮箱地址为：compliance@jcetglobal.com；信函接收地址为上海市浦东新区锦绣东路2777弄29号楼，内审收。

- The ethics email: It shall be managed by the Internal Audit Department of the Company to receive internal or external real-name and anonymous complaints or whistle-blowing. The e-mail address is: compliance@jcetglobal.com; and the written letter shall be addressed to the Internal Audit Department at Building 29, No. 2777, East Jinxiu Road, Pudong District, Shanghai.
- 当面陈述，鼓励员工直接向直属经理提出投诉或举报事项。若员工有理由认为其经理卷入被举报的事件或与该事件存在利益冲突，则向上一级管理层、人力资源部、内审部提出。第三方可直接联系公司的相应业务经理、人力资源部或内审部。收到举报的经理/人力资源部工作人员应及时将举报材料转交给公司内审部。
- Face-to-face statement: The Company encourages employees to file complaints or report matters directly to their supervising managers. If the employee has reason to believe that his or her manager is involved in the reported matter or has a conflict of interest with such matters, he or she shall report it to the upper level of management, the Human Resources Department and the Internal Audit Department. Third parties may directly contact the appropriate business manager, the Human Resources Department or the Internal Audit Department of the Company. The manager/ staff of the Human Resources Department who have received the report shall promptly forward the report materials to the Internal Audit Department of the Company.
- 举报人可通过上述的当面陈述、发送电子邮件、发送信函或其他形式进行举报，也可以委托他人举报。公司提倡负责任的实名举报，但举报人也可以选择保持匿名。
- The Whistleblower can report through face-to-face statement, emails, letters as mentioned above or other ways, as well as entrust others to report. The Company advocates complaints in real name, but Whistleblowers may choose to remain anonymous.

举报人应当如实提供情况，公司内审部接收举报人的投诉或举报事项的内容应如实记录，并及时采取行动。公司内审应视案件严重程度向公司合规工作组提交跟踪报告以及相关审查或调查结果（如适用）。如有必要，公司内审部可协同法务部门共同调查举报事项。举报事项调查结束后，公司内审部可依情况将调查过程或处理结果告知举报人（若有）。

The Whistleblower shall provide information truthfully. The Internal Audit Department of the Company shall truthfully record the contents of complaints and whistle-blowing received from the Whistleblower, and take prompt actions. The Internal Audit Department shall promptly submit a follow-up report and relevant review or investigation results (if applicable) to the

Compliance Working Group of the Company based on the severity of the matters. The Internal Audit Department may coordinate with the Legal Department to jointly investigate the reported matters, if necessary. After the investigation on the reported matter is completed, the Internal Audit Department shall inform the Whistleblower of the investigation progress or results (if any).

举报人认为接收、办理举报的工作人员与被举报人是近亲属或有利害关系，可能影响举报事项客观、公正处理的，有权向公司内审部提出回避要求。情况属实的，有关人员必须回避。

If the whistleblower believes that the person in charge of receiving or handing the report is a close relative or has conflicts of interest with the target of report, which may affect the objectivity and fairness of the investigation, he or she has the right to make a request to the Internal Audit Department for the recusal of such person. If the circumstance is true, relevant personnel must recuse himself or herself.

## **5、Protection of Whistleblowers 举报人保护措施**

公司保护举报人应当遵循保密、限制信息仅供有权调查案件的小团队知悉、奖励和举报人合法权益不受侵犯的原则。与举报人、证人、信息载体、举报的行为以及任何后续调查有关的所有信息必须在可适用法律或法规允许的范围内作保密处理。

The Company shall follow the principles of confidentiality in protecting Whistleblowers, restricting the information to the team with the authority to investigate the case, rewarding and protecting the legitimate rights and interests of Whistleblowers. All information related to the Whistleblowers, witnesses, information carriers, the act of whistleblowing and any subsequent investigation shall be treated confidentially to the extent permitted by applicable laws or regulations.

任何部门和个人不得以任何借口打击报复举报人，在实名举报案件中，公司及调查团队更需确保被举报之人在调查前后不会对举报人采取积极报复或消极对待，也不会以明示或暗示方式表达其可能对举报人产生不利的行为和后果。

No department or individual shall retaliate against the Whistleblower under any excuse. In a real-name report case, the Company and the investigation team need to further ensure that the reported person will not take active retaliation or negative treatment against the Whistleblower before and after the investigation, and shall not express or imply that the Whistleblower may encounter adverse actions and consequences.

## **6、Violations in the Reporting Process and Disposal 举报过程中的违规行为及处理**

任何单位和个人不得干扰和妨碍经办工作人员或公司指派的调查团队查处举报事项。接收及办理举报事项的工作人员或公司指派的调查团队，应当严格依法办事，保护举报人的隐私及合法权益。

No department or individual shall interfere with or hinder the person-in-charge or investigation team designated by the Company from investigating and handling the reports. The staff or the investigation team designated by the Company who receives and handles the reports shall protect the personal privacy and legal rights and interests of the Whistleblower according to laws.

接收举报人员在办理举报事项中，有下列行为之一的，应追究相应的责任：

In case the receiver has any of the following behaviors when handling the reports, he/she shall be held responsible:

- 扣压、隐匿或私自销毁举报材料；  
Withholding, concealing or destroying relevant materials without permission;
- 刁难、威胁举报人；  
Making difficulties for or threatening the Whistleblower;
- 殴打、污辱举报人；  
Beating or insulting the Whistleblower;
- 无正当理由拒不接受举报；  
Refusing to accept the report without any proper reason;
- 不积极搜证、查证或验证；  
Inactive investigation, search or verification;
- 私下将举报情况透露给被举报人或其他第三方；及  
Disclosing the report to the target of report or to other third parties privately; and
- 有其他玩忽职守、滥用职权、徇私舞弊、或接受被举报人贿赂或其他好处的行为。  
Other behaviors of dereliction of duty, abuse of power, malpractice for personal gain or accepting bribes or other benefits from the target of report.

## **7、Review and Update 审核与更新**

长电科技会定期审核此政策，在有需要的情况下将进行更新，并核准发布。

JCET will review this policy on a regular basis and update it if necessary and approve for publication.