



反垄断与公平竞争 政策

Antitrust and Fair Competition Policy

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1. 反垄断声明 ANTI-TRUST STATEMENT OF THE ORGANIZATION

固德威坚信，在与供应商、客户或竞争对手打交道时，要以诚信、道德和不使用任何不公平竞争手段的方式来取得商业成功。固德威宗旨是公平、诚实地超越竞争对手。固德威禁止所有反竞争或违反适用的竞争法或反垄断法的行为。

GOODWE believes in succeeding in business ventures by dealing with integrity, ethics and without any unfair competitive means while dealing with suppliers, customers, or competitors. GOODWE aims to out-perform competition fairly and honestly. GOODWE prohibits all actions that are anti-competitive or otherwise contrary to applicable competition or antitrust laws.

2. 目标 OBJECTIVES

- 该政策规定了固德威的做法，不仅在组织内部，而且在与供应商、分销商和市场上其他竞争对手打交道时，对不公平竞争手段表现出零容忍。

The policy sets out an approach of GOODWE to demonstrate zero tolerance towards unfair means of competition not only within the organization but also in its dealing with suppliers, distributors and other competitors in the market.

- 该政策不仅有助于在参与健康竞争时保持专业礼仪，而且还指导我们在所有业务往来以及内部和外部关系中坚持诚信。

It will not only help to maintain professional decorum while participating in healthy competition but also guide us to adhere to our integrity in all our business dealings as well as relationships internally and externally.

- 该政策将使所有员工和人员对该做和不该做的事情更加明确。因此，它将在组织内部带来公平、道德和透明的行为。

The policy will bring more clarity about do's and don'ts by all employees and personnel. Thus, it will bring fair, ethical and transparent conduct within the organization.

- 董事会应负责本政策，并可对员工进行/组织任何必要的培训，以确保其正确执行和遵守。

The board of directors shall be responsible for this policy and may conduct/organize any necessary training, if any, for employees for proper implementation and adherence.

- 政策的变更和修订应在董事会事先批准后进行并形成文件。

Changes and amendments to the policy shall be made and documented after prior approval of the board of directors.

- 定期审查和更新政策，以确保符合不断变化的立法环境和固德威的经营理念。本政策将从发布之日起至少每年审查一次。

Periodic review and update of the policy may also be undertaken to ensure compliance with evolving legislative landscape and GOODWE's business philosophy. This policy will be reviewed at least once a year from the date of release.

- 每一位固德威员工和所有代表固德威的人员都应遵守所有法律和固德威的政策、程序、原则和标准，包括本政策。

Every GOODWE employee & all personnel representing GOODWE are expected to adhere to all laws and GOODWE's policies, procedures, principles, and standards, including this Policy.

3. 适用性 APPLICABILITY

- 本政策适用于全球所有地点的所有员工、管理人员或为固德威工作或以任何身份代表固德威的任何人员，包括但不限于中国以外的子公司(以下简称“固德威人员”或“您”)。

This policy applies to all employees, officers or any person working for GOODWE or on its behalf in any capacity at all locations, across the world, including but not limited to its subsidiaries out of China (hereafter referred to as 'GOODWE Personnel' or 'You').

4. 与竞争对手打交道 DEALING WITH COMPETITORS

4.1 禁止反竞争安排 Prohibition on anti-competitive arrangements

- 我们通过行业协会、专业研讨会和任何其他行业组织促进与竞争对手的互动，只要它们是公平、道德和透明的，且不促进任何反竞争安排。

We promote interactions with competitors through trade associations, professional seminars, and any other industry groups as long as they are fair, ethical, and transparent and don't promote any anti-competitive arrangements.

4.2 禁止分享敏感信息 Prohibition on sharing sensitive information

- 固德威人员在任何平台上与竞争对手打交道时应始终保持谨慎，不得泄露任何信息或参与与定价、中标合同的投标金额、销售条款和条件或任何可能助长不公平贸易行为并限制公平、自由和公开市场的相关敏感信息有关的讨论。

GOODWE Personnel shall exercise caution at all times while dealing with competitors on any

platform and shall not divulge any information or get involved in discussions related to pricing, bid amounts of winning contracts, terms and conditions of sale or any related sensitive information which may promote unfair trade practice and restrict the fair, free and open market.

4.3 合乎道德的信息来源 Ethical sources of information

- 所有竞争信息或情报必须通过允许的合法和道德手段收集,例如发布的新闻、新闻稿和公共领域的信息。固德威的任何创新研究工作都不得受到与竞争对手讨论的影响。

All competitive information and/ or intelligence must only be collected through permitted legal and ethical means such as published news, press releases, and information available in the public domain. Any innovative research effort at GOODWE must not be influenced by discussions with competitors.

4.4 限制性做法 Restrictive practices

- 禁止通过直接或间接手段限制竞争对手的价格、客户选择或产品销售条款和条件的自由。

Restricting the freedom of competitors by way of price-fixing, customer selection or terms and conditions of sale of products by direct or indirect means are some important elements of competition law that are prohibited under all circumstances.

- 禁止任何形式的书面或口头协议或安排对公平和公开竞争产生不利影响,包括但不限于定价、市场共享、转售价格、独家供应/分销、操纵投标或串通投标、抵制其他企业、与竞争对手达成影响参与价格的行为。

Any type of agreement or arrangement, written or oral, which adversely impacts fair and open competition, including but not limited to price-fixing, market sharing, resale price, exclusive supply/ distribution, bid-rigging or collusive tenders, boycott other enterprises, arrangement with competitors to influence the price of engagement is prohibited.

5. 兼并与收购 MERGERS AND ACQUISITIONS

- 固德威鼓励收购和/或合并或任何类似的业务安排,以产生积极的协同作用,如降低成本或提高效率等。

GOODWE encourages acquisition and/or mergers or any similar business arrangements, which create positive synergy like reduction of cost or promote efficiencies and so on.

- 固德威不鼓励对资产、业务或股份的任何收购或任何其他类型的业务合并,如果此类收购或合并实质上限制了市场竞争。在所有国家,反竞争法都规定当局有权根据收入、资产价值、市场份额等门槛批准这种商业安排。

GOODWE discourages any acquisition of the asset, business or share or any other type of business

combination if such acquisition or merger substantially restrains competition in the market. In all countries, anti-competitive law provides for enforcement and administrative powers to authorities to approve such business arrangements depending on thresholds ranging from revenue, the value of assets, market share and so on.

- 任何拟议的合并或收购是否会事先获得当地政府的批准将取决于每项业务安排的事实和情况,所有固德威人员必须在任何此类业务安排的早期阶段咨询法务和董事会秘书。

Whether any proposed merger or acquisition will trigger prior approval from local authorities or not will depend on the facts and circumstances of each business arrangement and all GOODWE Personnel must consult the Head Legal and Company Secretary in the early stages of any such business arrangement.

6. 报告渠道 REPORTING CHANNELS

- 如果您知道任何不公平竞争行为,或者您怀疑任何不公平竞争行为已经发生或可能发生,那么您必须根据举报程序的规定尽快报告。

If you are aware of any unfair competition arrangement or if you suspect any unfair competition arrangement has occurred or may occur, then you must notify as per the regulations on Reporting Procedures as soon as possible.

- 如果从竞争对手那里收到任何未经授权的消息或信息,固德威人员必须立即报告给法务和董事会秘书。
In case any unauthorized news or information is received from any competitor then GOODWE Personnel must immediately report it to the Head Legal and Company Secretary.
- 因匿名举报很难进行调查,固德威希望这项政策能让所有固德威人员实名举报。如果您希望秘密地报告疑虑,我们将确保尽一切努力对您的身份保密,并仅在必要时向参与调查的人员透露。

GOODWE hopes that this policy will enable all GOODWE Personnel to voice whistle-blowing concerns openly. Completely anonymous disclosures are difficult to investigate. If you wish to raise concern confidentially then we will ensure to make every effort to keep your identity a secret and only reveal it where necessary to those involved in investigating the concern.

7. 遵从性和监控 COMPLIANCE AND MONITORING

- 所有固德威人员应确保遵守本政策。

All GOODWE Personnel shall ensure adherence to this Policy.

- 任何违反本政策或任何其他反垄断法的行为都可能对固德威人员和/或固德威造成严重的刑事处罚和民事损害。

Any violation of this policy or any other antitrust laws can carry severe criminal penalties and civil damages for GOODWE Personnel and/ or GOODWE.

- 公司保留采取纪律处分的所有权利，包括解雇参与违约的固德威员工。

The company reserves all rights to initiate disciplinary actions up to and including termination of GOODWE Personnel involved in the breach.

本政策经董事会批准，自 2023 年 9 月 7 日起生效。

This policy was approved by the Board of Directors effective 7 September, 2023.

黄敏

Min Huang

董事长兼总经理

Chairman of the Board of Directors and President

日期：2023 年 9 月 6 日

Date:6/9/2023