

长电科技商业行为准则

JCET Code of Business Conduct

1、Purpose 目的

长电科技高度重视商业行为对公司自身、股东、客户、员工、合作伙伴以及社区与环境等利益相关方所带来的影响，并致力于通过透明化的信息披露来取得利益相关方的信任。长电科技商业行为准则明确了长电科技在商业活动上的合规标准和道德原则，包含了公司在所有商业活动中对合规管理、商业道德的承诺。长电集团全体员工均应熟悉本道德行为准则（下称“《行为准则》”）并将其作为自身行为的指导原则。

“沟通无碍原则”是我们公司的常规，《行为准则》提供原则性指导，为公司政策提供进一步的具体细节，我们鼓励每一个人发问、寻求指导及表达个人关心。本准则旨在防止犯罪并鼓励如下行为：

JCET places a high value on the impact of its business practices on its stakeholders, including the Company itself, shareholders, customers, employees, partners, and the community and environment, and is committed to gaining the trust of its stakeholders through transparent information disclosure. The JCET Code of Business Conduct defines JCET's compliance standards and ethical principles for business activities and contains the company's commitment to compliance management and business ethics in all business activities. All employees of JCET Group should be familiar with this Code of Business Conduct and Ethics (hereinafter referred to as “Code”) and take this Code as guiding principles. “Communication without hindrance” is our company’s common practice. This Code provides guidance in principle and further details for the company’s policies. We encourage everyone to ask questions, seek guidance and express personal concerns. This Code is aimed at preventing criminal activities and encouraging behaviors as follows:

- 诚实道德的行为，包含依《行为准则》来处理个人与专业之间显而易见的利益冲突；
- Honest and ethical behaviors, including dealing with the obvious conflict of interest between the personal interests and the professional interests according to this Code;
- 遵守合适的法律、法规、规则等；
- Compliance with applicable laws, regulations, rules, etc.;
- 根据《行为准则》的要求及时向相关管理人员或部门报告违反本准则的行为；
- Reporting to the relevant management personnel or department about any violation of this Code as required hereunder;

- 每一位员工都有严格遵守《行为准则》的责任。
- Every employee has the duty to comply with this Code.

2、Scope 范围

《行为准则》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、全职员工、非全职员工和实习生（统称为“员工”）。

This Code 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、Inquiry about and Reporting of Violations 询问和举报违规情况

(1) Reporting in Good Faith 善意的举报

每一个员工都有责任举报其所知晓或观察到的任何与此政策相抵触的违规行为。举报应该是“善意”的，须出于合理的怀疑或真实的信息。“善意”意味着举报是完整的、诚实的，但不要求举报内容完全准确无误。即使举报的内容最终被证明有误，“善意”的举报者也不会被追究责任，关键在于举报者在举报时有合理理由相信自己报告的内容是真实的且已实际发生或即将发生。

Every employee has the responsibility to report any violations of this Code that he or she has known or observed. The report should be “in good faith” and must be based on reasonable doubt or true information. “Good faith” means that the report is complete and honest, but it is not required that the report be completely accurate. Even if the report is ultimately proved wrong, the whistleblower in good faith will not be held accountable where the whistleblower has had reasonable grounds to believe that the event in the report should be true and has actually occurred or is about to occur.

(2) Channels for Inquiry and Reporting 询问和举报的渠道

公司专门设立了以下举报受理渠道：

The Company has set up the following reporting channels:

- 举报邮箱：compliance@jcetglobal.com
- Reporting E-mail: compliance@jcetglobal.com

员工可以通过实名或匿名的方式举报。公司对于善意举报者应保护其姓名、身份及举报内容，并确保举报者不会遭到被举报者或其他人员的打击及报复。

Either real name or anonymous reporting is permissible. The Company shall maintain confidential the name and identity of the whistleblower as well as the contents of report to ensure the whistleblower will not be subject to any attack or retaliation from the person that has been reported against.

4、Conflicts of Interest 利益冲突

(1) Definition of Conflicts of Interest 利益冲突的定义

公司在做出商业决策时，不应受员工个人利益的影响。当个人利益和公司利益的互相竞争可能损害或者从表面上看来可能影响商业决策的完整性时，就会产生利益冲突。个人利益与公司利益的冲突可能导致做出与公司利益相反的决策。员工应避免任何可能让人质疑其意图、判断力、诚实或客观性的情况。利益冲突的出现可能损害员工的声誉，亦会损害公司的声誉，严重时也可能违反法律法规及公司规章而应承担相关纪律惩戒或法律责任。

Business decisions made by the Company shall not be influenced by employees' personal interests. Conflicts of interest exist where personal interests competing with the Company's interests may impair, or appear to impair, the integrity of business decisions. The conflicts between personal interests and the Company's interests may result in decisions that are against the Company's interests. Employees shall avoid any situation that might call into question his/her intentions, judgment, honesty or objectivity. The conflicts of interest may injure the reputation of both employees and the Company, and if it is serious, may even result in disciplinary actions or other legal liabilities for violations of laws, regulations and Company rules.

(2) Situations of Conflicts of Interest 利益冲突的情形

- 个人关系：包括亲属关系、亲密关系或其他利益关系。
- Personal relationships including kinship, intimate relationships, or other relationships involving interests.
- 亲属关系：包括通过血缘（父母、子女、兄弟姐妹、祖父母、孙子女、表亲等）、婚姻（配偶、姻亲等）或收养建立的关系；
- Kinship: including relationships by blood (parents, children, siblings, grandparents, grandchildren, cousins, etc.), marriage (spouse, in-law, etc.) or adoption;
- 亲密关系：任何亲密、恋爱或同居关系；及

- Intimate Relationship: any close or romantic relationship, or domestic partnership; and
- 其他利益关系：可能严重损害员工客观评估其他个体的能力的任何其他类型的亲密或亲近关系，无论是个人关系还是经济关系。
- Other Relationships Involving Interests: any other types of close or intimate relationship, be it personal or economic, that may significantly impair the employee' s ability to objectively evaluate other individuals.

5、Intellectual Property and Confidential Information 知识产权和机密信息

知识产权和机密信息对公司的成功至关重要。公司的成功不仅依赖于员工的创新能力和辛勤付出，还依赖于员工认真保护及随时防范公司机密信息的泄露。

Intellectual property and confidential information are critical to the Company. The success of the Company depends not only on the innovation and diligence of employees, but also on their protection of the Company' s confidential information at all times.

(1) Protection of Intellectual Property 知识产权保护

公司对于知识产权、专利、著作权、版权、保密技术和品牌都采取相应的保护，且采取必要措施维护权利并严惩侵权者。同时，公司致力于尊重其他方的知识产权。公司员工不得直接或间接侵犯任何第三方的知识产权。

The Company protects its intellectual property, patents, copyrights, confidential technology and brands and takes necessary measures to maintain its rights and severely punish infringers.

Further, the Company is also committed to respecting the intellectual property rights of other parties. Employees shall not, directly or indirectly, infringe the intellectual property rights of any third party.

(2) Confidential Information 机密信息

公司所有员工应当遵守公司关于保密的规定，包括但不限于《保密制度》以及与公司签订的相关合同，履行保守公司保密信息的义务；应当依据法律法规、规章制度及合同要求，对客户的相关保密信息予以保密。

All employees shall comply with the Company' s rules on confidentiality, including but not limited to the Confidential Policy and the relevant contracts concluded with the Company, and perform the obligation to protect the Company' s confidential information. In addition, employees shall keep the relevant confidential information of customers confidential in

accordance with laws, rules, regulations and the requirements of applicable contracts.

6、 Gift and Entertainment 礼品和招待

公司要求所有员工，基于产品或服务的品质、价格及其他相关竞争因素，客观独立地做出商业决策，而不被个人喜好、不正当的礼品或招待所影响。

The Company requires all employees to make business decisions objectively and independently based on the quality, price and other relevant factors of products or services, avoiding being affected by personal preferences, improper gifts or entertainment.

公司禁止通过利用不正当的业务招待或提供礼物获取业务或业务机会。若某人与公司存在或正寻求业务关系，则在向此人提供或接受此人的礼物或招待时必须谨慎处理。接受礼物或招待可能会影响我们做出客观决定的能力，同样，提供礼物和招待可能会被视为试图影响商业决策的不当行为。

The Company prohibits any activity of obtaining business or business opportunities by providing improper business entertainment or gifts. Employees must prudent when providing or accepting gifts or hospitality from a third party who has, or is seeking, a business relationship with the Company. Accepting gifts or entertainment may affect our ability to make objective decisions. Similarly, providing gifts and entertainment may be regarded as inappropriate behavior with an intent to influence business decisions.

任何以获取不正当商业优势为目的的礼物与招待，都是不被允许提供或接受的。为了避免利益冲突并保护公司的声誉，所有的礼品和招待应当公开给予或接受，且必须按照公司礼品招待相关规定行事。

It is prohibited to provide or accept any gift or entertainment for the purpose of obtaining an improper business advantage. In order to avoid any conflicts of interest and to protect the reputation of the Company, all gifts and entertainment should be given or accepted openly, as required by the rules on gifts and entertainment.

7、 Anti-Corruption and Anti-Bribery 反腐败与反贿赂

长电科技是上市企业，在不同国家和地区开展业务，须遵守适用于公司经营的所有反腐败和反贿赂的法律法规，包括但不限于中国的反贿赂法、美国的反海外腐败法、英国的反贿赂法等。

JCET Group is a listed company, which conducts business in different countries and regions, and must comply with all applicable anti-corruption and anti-bribery laws and regulations, including but not limited to the Anti-Bribery Laws of the PRC, the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, among others.

公司的商业行为建立在“公平交易”的原则上。公司严禁任何形式的贿赂或腐败行为，无论这种行为涉及个人或单位、政府官员或非政府官员。公司鼓励员工检举任何相关的腐败、贿赂犯罪。

The Company's business activities are conducted based on the principle of "fair trade". The Company strictly prohibits bribery or corruption of any kind, whether or not involving an individual or entity, a government official, or a non-governmental official. The Company encourages employees to report any activity of corruption and bribery.

(1) Strict Prohibition of Bribery 公司严禁贿赂行为

禁止行贿：公司严禁为了获得合同或其他商业优势、或影响他人正当行使职权而向任何人行贿（包括政府官员和非政府官员）。

Prohibition of offering bribes: the Company strictly prohibits offering bribery to any person (including government officials or non-governmental officials) to obtain contracts or other business advantages or to influence others to exercise their authorities properly.

禁止索贿、受贿：公司严禁任何员工向任何个人或单位索取、接受任何财物，为对方谋取利益。

Prohibition on soliciting or accepting bribes: the Company prohibits employees from soliciting or accepting property from any individual or entity for the benefits of such party.

(2) Interaction with Government Officials 与政府官员的互动联系

员工与政府官员的互动联系必须透明且符合商业规范。向政府官员提供任何礼物或招待，无论价值多少，都需要遵守公司相关礼品和招待的制度。

Employees' interactions with government officials must be transparent and business-compliant. Any gifts or hospitality provided to government officials, regardless of the value, are subject to the Company's gifts and entertainment rules.

(3) Political Donations 政治捐献

员工可自主参与合法的政治活动，但前提是应使用自己的时间和金钱。未经公司法务部批准的情况下，不得使用公司资源从事任何政治活动或代表公司进行赞助、捐款或捐献。

Employees are free to participate in legitimate political activities provided that they use their own time and money. Employee shall not use Company resources for any political activity or to make sponsorship, donation or contributions on behalf of the Company, without the approval of the Legal Department.

8、Insider Information and Insider Trading 内幕信息和内幕交易

(1) Insider Information 内幕信息

“内幕信息”是指理性的投资者在判断是否交易证券时可能认为重要的信息，包括公司及其关联公司，经销商、供应商及其他第三方合作伙伴的未公开的涉及证券交易，但一旦公开或使用即会造成正面或负面影响的信息。

“Insider information” means the information that a reasonable investor might consider crucial when deciding whether to trade securities, including information of the Company and its affiliates, distributors, suppliers and other third-party partners that is not public and relates to the trading of securities, and could have a positive or negative impact if publicized or used.

员工不得在掌握内幕信息（无论是公司的，还是其他企业的）的情况下直接或透过任何第三方间接交易证券（包括任何的债券），并应遵守内幕交易及其他适用的证券交易和处理保密信息相关的法律法规。未经授权，员工不得使用或披露内幕信息。

The employees shall not trade the securities, including any debt securities, directly or indirectly through any third party while in possession of insider information (whether of the Company or other enterprises) and shall comply with the laws and regulations on insider trading, securities trading and confidential information. Employees shall not use or disclose inside information without authorization.

(2) Protection on Insider Information 对内幕信息的保护

除非内幕信息已公开，否则员工对持有的内幕信息有保密义务，不得就此类信息进行交易，也不得与其他人共享此类信息，即便是亲朋好友。员工不得根据内幕信息自行或诱使、指示其他人从事证券交易，也不得向其推荐此类交易。

Unless the insider information is publicly known, employees are obligated to keep the insider information confidential and shall not trade based on such information, nor share such information with others, even relatives and friends. Employees shall not, based on insider information, engage in, or induce or instruct others to engage in, securities transactions, or refer such transactions to other people.

9、Anti-Money Laundering 反洗钱

洗钱是指为掩饰、隐瞒毒品犯罪、黑社会性质的组织犯罪、恐怖活动犯罪、走私犯罪、贪污贿赂犯罪、金融犯罪等犯罪活动所得及其产生的收益的来源和性质，并将其转入合法经济活动的犯罪行为。

Money laundering refers to the criminal acts of covering up or concealing the source and nature of the income and yields obtained from criminal activities such as drug-related crimes, organized

crimes in the nature of criminal syndicate, terrorist crimes, smuggling crimes, corruption and bribery crimes and financial crimes, and transfer such income and yields into legitimate economic activities.

公司只与从事合法业务活动、信誉良好的客户、合作伙伴等交易相对方开展业务，并从合法来源获得资金。这些交易相对方必须遵守适用的反洗钱法律法规和公司内部制度中规定的透明度要求。

The Company only conducts business with reputable customers, business partners and other counterparties that are engaged in legitimate business activities, and obtains funds from legitimate sources. These counterparties must comply with applicable anti-money laundering laws and regulations as well as the requirements for transparency set forth in the Company's internal rules.

10、Trade Usage and Antitrust Compliance 贸易惯例与反垄断合规

公司必须根据所有适用的反垄断和竞争法律法规开展市场行为。公司不得参与任何可能违反适用的反垄断法律法规的共谋或共同计划。就公司按照所有适用的反垄断法律法规在市场上展开激烈竞争的努力，公司的每一位员工都应给予支持。

The Company must perform market practices in accordance with all applicable antitrust and competition laws and regulations. The Company shall not engage in any conspiracy or common scheme that may violate the applicable anti-trust laws and regulations. Every employee is expected to support Company to compete vigorously in the market in compliance with all applicable antitrust laws and regulations.

11、Trade Control 贸易管制

公司遵守适用的关于产品、技术进出口，经济制裁或贸易禁令等贸易管制法律法规、条例、政策及命令，包括但不限于；

The Company comply with the applicable trade control laws, regulations, ordinances, policies and orders relating to import or export of products or technology, economic sanctions or trade prohibitions, including but not limited to:

- 关于产品、技术、数据或信息进口和出口限制的法律；
- Laws relating to restrictions on the import and export of products, technology, data or information;
- 禁止向某些国家、组织或个人提供产品、技术、数据或信息的法律；

- Laws prohibiting supply of products, technology, data or information to certain countries, organizations or individuals;
- 中国境内、境外关于因公司进出口机器、原材料、零部件、技术、软件等而需受制于出口国或进口国相关的经济制裁和贸易禁运的政策或命令；
- Policies or orders of the exporting or importing countries, inside and outside China, relating to economic sanctions and trade embargoes that the Company is subject to due to the import and export of machines, raw materials, parts, technologies, software, etc.;

12、Technology Import and Export Control 技术进出口管制

技术进出口是指从中国境外向中国境内，或者从中国境内向中国境外，通过贸易、投资或者经济技术合作的方式转移技术的行为，包括专利权转让、专利申请权转让、专利实施许可、技术秘密转让、技术服务和其他方式的技术转移。

Technology import and export refers to activities of transferring technologies from foreign countries to China or vice versa by way of trade, investment, or economic and technical cooperation, including assignment of patent rights, assignment of patent application rights, licensing for patent exploitation, assignment of technical secrets, technical services, and other forms of technology transfer.

公司不得进（出）口国家禁止进（出）口的技术；进（出）口属于限制进（出）口的技术，公司应向国务院外经贸主管部门提出进（出）口申请；进（出）口属于自由进（出）口的技术，应当向国务院外经贸主管部门办理合同登记。

The companies shall not import or export the technologies that are prohibited from import or export by the Chinese government; to import or export technologies that are restricted from import or export, the Company shall file import or export applications with the competent departments under the State Council; for the technologies freely imported or exported, contracts shall be registered with the competent departments under the State Council.

13、Total Quality and Non-Conflict Mineral 全面品质和无冲突矿产

(1) Overall Quality 全面品质

公司致力于为客户提供最优质的产品和服务。为了实现这一目标，公司的全体员工均有义务承担我们的全面品质精神。我们都必须致力于零缺陷的工作、满足内部及外部客户的要求，并开发帮助我们进行事前管理及事后跟进质保服务的系统。全面品质精神着眼于我们每位员工每天不断进步。

The Company is committed to providing the highest quality products and services to its customers, and, in order to achieve this goal, all employees of the Company are obliged to undertake our total quality spirit. We are devoted to zero defect work, meet the requirements of internal and external customers, and develop a system to help us ex-ante management and ex-post quality assurance service. The overall quality spirit focuses on the continuous progress of each employees every day.

(2) Non-Conflict Minerals 无冲突矿产

冲突矿产是指在刚果民主共和国及其周围国家和地区境内的锡石、黑钨、钨钼、铁矿和黄金等稀有金属。这些地区的大部分采矿活动与冲突的武装组织有关（资助）导致该地区长期不稳定，所以被称为“冲突矿产”，这些国家包括：刚果（金）、卢旺达、乌干达、布隆迪、坦桑尼亚、肯尼亚。对于冲突矿产的开采已造成严重的人权与环境问题。

Conflict minerals refer to rare metals such as cassiterite, wolframite, coltan, iron ore and gold in the Democratic Republic of the Congo and its surrounding countries and regions. Most of mining activities in these areas are related to armed groups in conflict (sponsorship), leading to long-term instability in this region, so they are called “conflict minerals”. The countries include: Congo (Jin), Rwanda, Uganda, Burundi, Tanzania and Kenya. The exploitation of conflict minerals has caused serious human rights and environmental problems.

为确保公司按照国际规范开展业务，公司负责材料采购和使用的部门及员工应避免公司在生产制造过程中使用冲突矿产为原材料。

In order to ensure that the Company carries out its business in accordance with international norms, the Company’s departments and employees responsible for material procurement and use should avoid using conflict minerals as raw materials in the Company’s production and manufacturing process.

14、Human Rights and Environmental Protection 人权和环境保护

(1) Respect for Human rights and Dignity 尊重人权和尊严

公司及员工在开展业务过程中，应尊重人权和尊严，支持旨在促进和保护人权的举措。公司绝不容忍在公司的工作场所或供应链中发生侵犯人权的情况，比如雇佣童工、奴役、贩卖人口、强迫劳动或虐待。

The Company and its employees should conduct business in a manner that respects human rights and dignity and supports initiatives aimed at promoting and protecting human rights. The Company does not tolerate human rights violations, such as child labour, slavery, trafficking,

forced labour or abuse, in the workplace or in supply chain.

(2) Environmental Protection 保护环境

考虑到公司员工及社会大众的安全及福祉，公司各部门应当增强环境保护意识、不浪费资源，严格遵守所适用的环境保护法律法规，包括但不限于《中华人民共和国环境保护法》、《中华人民共和国海洋环境保护法》、《中华人民共和国环境影响评价法》、《中华人民共和国清洁生产促进法》等。

Considering the safety and welfare of the employees and the society, all departments of the Company shall enhance their awareness of environmental protection, refrain from wasting resources and strictly comply with all applicable environmental protection laws and regulations, including but not limited to the Environmental Protection Law of the People' s Republic of China, the Marine Environmental Protection Law of the People' s Republic of China, the Law on Environmental Impact Assessment of the People' s Republic of China and the Cleaner Production Promotion Law of the People' s Republic of China.

公司各部门，特别是研发和生产部门及各员工，应当采取措施，防治在产品研发、生产或者其他活动中产生的废弃物、废气、废水、废渣、固体废物、危险废物、粉尘、恶臭气体、放射性物质以及噪声、振动、光辐射、电磁辐射等对环境的污染和危害，应依法定期检查、维护并将可能的危害减至最低。所有的废料处理均应委托有资质的第三方依法律规定妥善报废处置。

All departments of the Company, especially the R&D and production departments and their employees, shall take measures to prevent and control the pollution and harm to the environment caused by waste, waste gas, waste water, waste residue, solid waste, hazardous waste, dust, odor gas, radioactive substances, noise, vibration, light radiation, and electromagnetic radiation generated in the R&D, production and other activities, and shall conduct regular inspection and maintenance according to the law to minimize possible hazards. All waste materials shall be properly scrapped and disposed of by a qualified third party in accordance with the law.

15、Safety and Health 安全及健康

(1) Prohibition of Violence 禁止暴力

公司根据相关法律法规为员工提供安全和健康的工作环境。员工均有义务遵守环境、安全和健康方面的行为规范，报告事故、伤害和不安全的设施、操作或状况，为其他员工维护一个安全和健康的工作场所。

The Company provides employees with a safe and healthy working environment in accordance with relevant laws and regulations. Employees are obliged to abide by this Code of conduct on

environment, safety and health, report accidents, injuries and unsafe facilities, operations or conditions, maintaining a safe and healthy workplace for other employees.

公司绝不容忍暴力，包括打架、斗殴、推挤、威胁、恐吓或者任何类型的暴力行为。此等行为可包括用口头或书面语言、手势或表情进行直接或间接的伤害威胁。

The Company will not tolerate violence, including fighting, brawling, pushing, threatening, intimidating or other violent behaviors of any kind. Such conduct may include a direct or indirect threat of harm, whether verbal or written, gestures or expressions.

若员工认为自身的工作环境不安全，则应立即与主管讨论。在讨论过后，若员工仍然对自己的工作环境感到不适，则应联系公司的人力资源部协调。

If an employees considers that his or her working environment is unsafe, he or she should discuss it with his or her supervisor immediately. If, after discussion, the employee still feels uncomfortable with the working environment, he or she should contact the Human Resources Department of the Company to coordinate.

(2) Prohibition of Narcotic Drugs and Misuse of Drugs or Alcohol 禁止毒品、滥用药品或酒精

公司严禁员工在办公、经营场所、公司活动场所或员工代表公司出席的任何场合持有或使用违禁物品，例如毒品，亦不得受其影响；不得参与贩毒或销售毒品；不得在前述场合中滥用药品或酒精。

The Company strictly prohibits employees from possessing or using or being under the influence of prohibited items, such as narcotic drugs, within the office, business premises, Company event or on any occasions in which the employee is present on behalf of the Company. The employees shall not participate in the trafficking or sale of narcotic drugs, and shall not abuse drugs or alcohol in any of the aforementioned occasions.

16、Respect 尊重

(1) Equal Opportunity and Non-Discrimination 公平机会、无差别待遇

公司保证对所有员工一视同仁。公司绝不容忍基于“受保护特征”歧视他人（包括但不限于现任及前员工、应聘者、客户、顾客、分销商、供应商、代理商、访客）或因为“受保护特征”影响招聘或与员工相关的决定。“受保护特征”包括但不限于种族、肤色、宗教、性别、年龄、国籍、民族、籍贯、残障、妊娠、性取向、性别认同、婚姻状况、家庭状况、身心障碍或兵役状况等。

The Company guarantees that all employees are treated equally. The Company will not tolerate discrimination against people (including, without limitation, current and former employees,

candidates, clients, customers, distributors, suppliers, agents and visitors) on the basis of “protected characteristics,” nor will it influence the recruitment or relevant employment decisions. “Protected characteristics” includes but are not limited to race, skin color, religion, gender, age, nationality, ethnicity, native place, disability, pregnancy, sexual orientation, gender identity, marital status, family status, physical and mental disability or military service status.

公司致力于对所有员工提供平等的就业机会，招聘、雇佣、晋升、薪酬、聘期、培训、发展机遇、纪律、绩效管理以及解聘都应在公平客观、不存在任何歧视的前提下进行。招聘和晋升取决于个人表现。这种表现与工作能力有关，而非依赖于群体关系。

The Company is committed to providing equal employment opportunities for all employees. Recruitment, employment, promotion, salary, employment term, training, career opportunities, discipline, performance management and dismissal shall be carried out fairly and objectively, without any discrimination. Recruitment and promotion depend on individual’s performance which is related to capability rather than relationship.

(2) Sexual Harassment and Other Forms of Harassment 性骚扰和其他形式的骚扰

公司绝不容许员工在上班期间或下班后对其他员工施以或遭受任何形式的骚扰。公司将立即采取适当措施阻止并应对违反本政策的行为，并可能对违规人员进行惩戒，甚至对恶性重大者，移送法办。

The Company will not tolerate the harassment of employees in any way during or after working hours. The Company will immediately take appropriate measures to prevent and respond to violations of this Code and discipline employees who commit violations. In the event of serious cases, violators will be turned over to applicable outside authorities.

公司零容忍职场性骚扰。职场性骚扰指于工作场所、工作过程中或基于工作关系发生的，以语言、文字、图像、肢体动作等方式实施的，与性有关的、违背员工意愿的行为。

The Company has zero tolerance standard for sexual harassment in the workplace. Sexual harassment in the workplace refers to the sex-related behaviors against the wishes of employees that occurs in the workplace, during work or based on a work relationship, in a form of language, words, images, body gestures, etc.

在工作场所遭遇、目击或了解性骚扰或其他任何形式的骚扰行为，除了通过第2.2条列举的举报方式进行举报，亦可举报给人力资源部、法务部或公司的CEO。公司收到举报后，将根据《员工手册》对违规行为进行调查和处罚。

Anyone who encounters, witnesses or becomes aware of sexual harassment or any other forms

of harassment at the workplace, can report to Human Resources Department, Legal Department or the CEO of the Company. Upon receipt of the report, the Company will investigate the alleged violations and make punishment pursuant to Article 18 of the Employee Handbook.

17、Protection of Privacy and Personal Information 隐私和个人信息保护

公司尊重所有人的隐私和尊严，包括公司股东、员工、客户、供应商及第三方合作伙伴等。

The Company respects the privacy and dignity of all individuals, including its shareholders, employees, customers, suppliers and third party partners, etc.

(1) Processing and Protection of Employees' Personal Information 员工个人信息的处理和保护

个人资料的收集仅限用于合法和相关目的，而且公司将采取一切商业上合理的措施以确保公司所持个人资料的准确性。

Personal information will be collected only for legitimate and related purposes, and the Company will take all commercially reasonable steps to ensure the accuracy of personal information that the Company holds.

员工在本职工作中有机会获悉或接触到其他员工的个人信息的，包括但不限于员工工资、个人身份、员工地址、员工家庭成员等个人信息，应对此类信息保密，严格按照公司政策、程序以及适用的数据保护法律、个人信息保护法律等法律法规规定谨慎地处理所有信息与IT系统，不得不当使用或向未经授权的个人或机构披露、泄漏或者传播员工个人信息。

Where employees have access to other employees' personal information in their work, including but not limited to the salary, personal identity, address and family member, they shall keep such information confidential and carefully handle all such information and IT systems in strict accordance with the Company's rules and procedures and the applicable data protection laws, personal information protection laws and other related laws and regulations. The employees shall not improperly use, disclose, divulge or disseminate employees' personal information to any unauthorized individuals or organizations.

(2) Protection of Third Party's Personal Information and Data 第三方个人信息及数据的保护

员工若在业务经营过程中有机会接触客户、供应商及其他业务合作伙伴的个人信息，应按照公司政策、程序以及适用的数据和个人信息保护法律法规认真谨慎地处理此类信息，不得：不当处理，或冒用公司的名义私自处理、买卖，或向未经授权的个人或机构披露或传播上述个人信息。

Employees who have access to personal information of customers, suppliers and other business partners in the course of business operations shall handle such information carefully and prudently in accordance with the Company's rules and procedures as well as the applicable data and personal information protection laws and regulations. Employees shall not, without authorization, fraudulently handle or use the name of the Company to dispose, trade, disclose or disseminate the above personal information to unauthorized individuals or organizations.

18、 Investigation of Violations 违规行为调查

公司发现员工的违规行为或收到针对员工违规行为的举报后，有权对不合规行为或合规风险隐患启动内部调查，并向公司CEO或董事会就调查情况和调查结论进行汇报。公司将妥善、谨慎处理所有举报的内容，公司将尽最大努力维护举报内容及举报者个人身份信息的保密性。公司将视情况在适当的时候向举报者提供举报处理反馈。

When the Company discovers or receives report on any violation, it may, at its discretion, initiate an internal investigation into the violation or potential compliance risk, and report the investigation and its result to the CEO or the Board of Directors of the Company. The Company will properly and carefully process all contents of the report and will use its best endeavors to maintain the confidentiality of reporting and the identity information of whistleblowers. The Company will provide feedback to the whistleblowers as the Company deems appropriate.

19、 Compliance Training 合规培训

公司将合规培训纳入员工培训计划，制订合规培训计划，定期组织有效的合规培训，使全体员工掌握应知的合规知识、规章制度和风险防控要求。

The Company shall incorporating compliance training into employee training plan, formulating compliance training plan and organizing effective compliance training, so that all employees can master the required compliance knowledge, rules and regulations and risk prevention requirements.

20、 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.