

瑞浦兰钧商业行为准则

REPT BATTERO Code of Business Conduct

一、目的

I. Purpose

瑞浦兰钧公司（以下简称“瑞浦兰钧”或“公司”）瑞浦兰钧坚持诚信经营、依法合规的价值理念，将合规管理作为公司稳健运营和可持续发展的重要基础。公司持续完善合规治理体系和风险管理机制，推动合规要求融入经营管理全过程，确保各项业务活动符合适用法律法规、监管要求、行业规范及商业道德标准。本行为准则旨在为全体员工提供统一的行为规范和合规指引，明确公司对诚信经营、廉洁自律、公平竞争、信息保护等方面的基本要求，并鼓励员工及商业伙伴共同维护公开、透明、负责任的商业环境。

REPT BATTERO Energy Co., Ltd. (hereinafter referred to as “REPT BATTERO” or the “Company”) upholds the values of conducting business with integrity and operating in compliance with applicable laws and regulations. The Company regards compliance management as an essential foundation for sound operations and sustainable development. It strengthens its compliance governance system and risk management mechanisms and integrates compliance requirements throughout its business and management processes to ensure that all business activities comply with applicable laws and regulations, regulatory requirements, industry standards, and business ethics. This Code of Business Conduct provides all employees with consistent standards of conduct and compliance guidance, sets out the Company’s fundamental requirements regarding business integrity, ethical conduct, fair competition, and information protection, and encourages employees and business partners to jointly maintain an open, transparent, and responsible business environment.

二、适用范围

II. Scope

本行为准则适用于瑞浦兰钧公司及其附属企业的全体员工，以及公司商业伙伴等相关利益方。

This Code applies to all employees of REPT BATTERO and its subsidiaries, as well as the Company’s business partners and other relevant stakeholders.

三、管理架构与职责

III. Governance Structure and Responsibilities

公司建立了专业化、垂直化的合规管理职能，在综合管理中心下设法务部与审计监察部。法务部负责法律合规政策的制定、法律法规识别及合规性评估，并深度参与重大决策的

合法合规性审查。审计监察部作为廉洁合规管理的专项机构，负责监督廉洁准则的执行及违规行为的核查。

The Company has established specialized and vertically integrated compliance management functions, with a Legal Department and an Audit and Supervision Department under the General Management Center. The Legal Department is responsible for formulating legal and compliance policies, identifying applicable laws and regulations, conducting compliance assessments, and participating in legal and compliance reviews of major decisions. As the dedicated function for integrity and compliance management, the Audit and Supervision Department oversees the implementation of integrity standards and investigates suspected violations.

四、举报与举报人保护

IV. Reporting Misconduct and Whistleblower Protection

公司鼓励员工、供应商、客户及其他合作伙伴对涉嫌违反法律法规、商业道德或公司制度的行为进行监督和举报，并建立由审计监察部门负责管理和运行的举报机制。

The Company encourages employees, suppliers, customers, and other business partners to report suspected violations of laws and regulations, business ethics, or Company policies. A reporting mechanism administered and operated by the Audit and Supervision Department has been established for this purpose.

公司设立电话、电子邮件、线上平台及实体信箱等多元举报渠道，允许举报人实名或匿名提交举报信息，并定期向员工开展举报机制及合规相关培训，提升员工对举报渠道及举报流程的认知和使用能力。

The Company provides multiple reporting channels, including telephone, email, online platforms, and physical mailboxes. Reporters may submit concerns either under their real names or anonymously. The Company also provides regular training on the reporting mechanism and compliance matters to improve employees' awareness of and ability to use the available reporting channels and procedures.

公司建立标准化举报调查程序，对收到的举报事项开展初步评估、调查核实、处理整改及跟踪复盘，并根据调查结果采取相应管理措施，推动相关问题整改和持续改进。

The Company has established standardized investigation procedures covering preliminary assessment, investigation and verification, corrective action, and follow-up review. Appropriate management measures are taken based on investigation findings to address identified issues and support ongoing improvement.

公司严格保护举报人合法权益，对举报信息、调查资料及举报人身份信息实行严格保密管理，仅授权人员可以接触相关信息。公司禁止任何形式的打击报复行为，对举报人因举报而遭受的威胁、歧视、骚扰或其他不利待遇实行零容忍，并将依法依规追究相关责任。

The Company strictly protects the lawful rights and interests of whistleblowers. Reports, investigation materials, and information concerning a whistleblower's identity are kept strictly confidential and may be accessed only by authorized personnel. The Company prohibits all forms of retaliation and adopts a zero-tolerance approach to threats, discrimination, harassment, or other adverse treatment arising from the reporting of concerns. Persons responsible for such conduct will be held accountable in accordance with applicable laws, regulations, and Company policies.

公司要求全体员工严格遵守本行为准则及相关管理制度，并将合规经营、诚信履职作为开展各项工作的基本要求。任何违反本行为准则的行为均可能对公司、员工及相关利益相关方造成不利影响，公司将依据事实情况、违规性质、影响程度及相关制度规定进行调查和处理。

All employees are required to comply strictly with this Code and the Company's related management policies. Compliant operations and the responsible performance of duties with integrity are fundamental requirements for all work. Any violation of this Code may adversely affect the Company, its employees, and relevant stakeholders. The Company will investigate and address suspected violations based on the facts, the nature and severity of the conduct, its impact, and applicable Company policies.

违反本行为准则的行为包括但不限于：违反员工权益保护、职业健康与安全管理要求；从事不公平竞争、垄断或其他扰乱市场秩序的行为；实施或参与贿赂、腐败、洗钱、利益输送、利益冲突未申报等廉洁违规行为；违规开展政治捐赠、慈善捐赠或赞助活动；违反信息安全、网络安全及个人信息保护要求；违反产品质量、安全及合规管理要求；以及违反公司可持续发展、环境保护及社会责任相关管理要求等行为。

Violations of this Code include, but are not limited to: breaches of employee rights protection or occupational health and safety requirements; unfair competition, monopolistic conduct, or other activities that disrupt market order; bribery, corruption, money laundering, improper transfers of benefits, failure to disclose conflicts of interest, or other integrity violations; unauthorized or non-compliant political contributions, charitable donations, or sponsorships; breaches of information security, cybersecurity, or personal information protection requirements; breaches of product quality, safety, or compliance requirements; and violations of the Company's requirements concerning sustainable development, environmental protection, and social responsibility.

对于经调查确认存在违规行为的个人或组织，公司将根据相关制度采取相应处理措施，包括但不限于谈话提醒、批评教育、责令整改、书面警告、绩效扣减、取消评优资格、岗位调整、降职降薪、解除劳动关系或终止合作关系等。对于涉嫌贿赂、腐败、欺诈、洗钱、侵犯商业秘密、数据泄露或其他违法犯罪行为的，公司将依法移交有关主管机关处理，并保留追究相关法律责任及经济损失赔偿责任的权利。

Where an investigation confirms that an individual or organization has committed a violation, the Company will take appropriate action in accordance with relevant policies. Such action may include verbal reminders, corrective education, orders to rectify, written warnings, performance-related deductions, disqualification from awards or

recognition, reassignment, demotion, salary reduction, termination of employment, or termination of the business relationship. Suspected bribery, corruption, fraud, money laundering, infringement of trade secrets, data breaches, or other unlawful or criminal conduct will be referred to the competent authorities in accordance with the law. The Company reserves the right to pursue legal liability and compensation for economic losses.

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五、 负责任商业行为承诺

V. Commitment to Responsible Business Conduct

1、 员工权益保障

1. Protection of Employee Rights and Interests

关于员工权益保障的定义与示例

Definition and Examples of the Protection of Employee Rights and Interests

员工权益保障是指公司依据适用法律法规及内部管理要求, 为员工提供公平、尊重、安全和健康的工作环境, 保障员工合法权益, 维护员工人格尊严, 并促进员工职业发展与身心健康。

Protection of employee rights and interests means providing employees with a fair, respectful, safe, and healthy working environment in accordance with applicable laws, regulations, and internal management requirements; safeguarding employees' lawful rights and interests and personal dignity; and supporting their career development and physical and mental well-being.

违反员工权益保障原则的行为包括但不限于:

Conduct that violates the principles of employee rights protection includes, but is not

limited to:

- 童工与强迫劳动：雇佣未达到法定就业年龄人员，或通过扣押身份证件、收取押金、限制人身自由、威胁恐吓等方式强迫员工劳动；
- **Child and forced labor:** Employing persons below the statutory minimum working age or compelling employees to work by withholding identity documents, requiring deposits, restricting personal freedom, making threats, or using intimidation.
- 歧视行为：基于性别、年龄、民族、国籍、宗教信仰、身体状况、婚育情况或其他与工作能力无关因素，对员工在招聘、晋升、培训、薪酬或其他就业机会方面进行不公平对待；
- **Discrimination:** Treating employees unfairly in recruitment, promotion, training, remuneration, or other employment opportunities on the basis of gender, age, ethnicity, nationality, religious belief, physical condition, marital or parental status, or other factors unrelated to their ability to perform the work.
- 骚扰与霸凌：实施言语侮辱、恶意诽谤、人身攻击、职场霸凌、性骚扰或其他侵犯员工人格尊严的行为；
- **Harassment and bullying:** Engaging in verbal abuse, malicious defamation, personal attacks, workplace bullying, sexual harassment, or other conduct that infringes employees' personal dignity.
- 侵犯员工合法权益：违反法律法规或公司制度要求，损害员工在劳动报酬、工作时间、休息休假、社会保险、平等就业等方面的合法权益；
- **Infringement of employees' lawful rights:** Violating laws, regulations, or Company policies in a manner that impairs employees' lawful rights relating to remuneration, working hours, rest and leave, social insurance, equal employment, or other employment matters.
- 忽视职业健康与安全要求：违反安全操作规程，强令冒险作业，隐瞒安全隐患，或未按照要求采取必要的职业健康与安全防护措施；
- **Disregard of occupational health and safety requirements:** Violating safe operating procedures, requiring employees to undertake hazardous work, concealing safety hazards, or failing to implement required occupational health and safety measures.
- 隐瞒或不报告安全风险：发现存在可能危害员工健康与安全的设备、设施、作业活动或工作环境后，未及时采取措施或向相关部门报告；
- **Concealment or failure to report safety risks:** Failing to take timely action or report to the appropriate department after identifying equipment, facilities, work activities, or workplace conditions that may endanger employee health or safety.
- 打击报复员工：因员工提出合理意见建议、举报违规行为或通过合法渠道反映问题而实施打击报复或不公平对待。
- **Retaliation against employees:** Retaliating against or treating employees unfairly because they have made reasonable suggestions, reported misconduct, or raised concerns through lawful channels.

1.1 尊重包容的工作环境

1.1 Respectful and Inclusive Workplace

公司严格遵守劳动用工相关法律法规，坚持合法用工、规范管理原则，将合规要求贯穿招聘、录用、在职管理及离职管理全过程，保障员工合法权益。在人权保护方面，公司坚决禁止童工、强迫劳动及任何形式的非法用工行为，严禁通过扣押证件、收取押金、限制人身自由等方式强迫劳动。公司倡导公平就业和相互尊重，反对基于性别、年龄、民族、宗教信仰、身体状况等因素的歧视行为，对骚扰、侮辱、霸凌等侵害人格尊严的行为实行零容忍，并建立员工沟通与申诉机制，保障员工合法表达诉求和获得公平处理的权利。

The Company strictly complies with applicable labor and employment laws and regulations and follows the principles of lawful employment and standardized management. Compliance requirements apply throughout recruitment, hiring, employment management, and separation processes to protect employees' lawful rights and interests. The Company strictly prohibits child labor, forced labor, and all other forms of unlawful employment, including the use of withheld documents, deposits, restrictions on personal freedom, or similar means to compel labor. It promotes equal employment and mutual respect, opposes discrimination based on gender, age, ethnicity, religious belief, physical condition, or other protected characteristics, and adopts a zero-tolerance approach to harassment, insults, bullying, and other conduct that infringes personal dignity. Employee communication and grievance mechanisms are in place to protect employees' right to raise concerns lawfully and receive fair treatment.

1.2 职业健康与场所安全

1.2 Occupational Health and Workplace Safety

瑞浦兰钧高度重视员工职业健康与安全，将其作为企业稳健运营和高质量发展的重要基础。公司坚持“预防为主、全员参与、持续改进”的原则，建立职业健康与安全管理体系统，将职业健康与安全要求融入研发、生产、工程建设、设备运维、仓储物流等业务环节，通过制度管理、风险防控和安全文化建设，持续提升职业健康与安全管理水平。每位员工均应遵守法律法规，避免任何可能危害自身或他人健康的行为，并在工作场所发现危险或有害的作业、设备或环境时，立即向上级主管或公司相关部门报告。

REPT BATTERO places a high priority on occupational health and safety and regards it as an essential foundation for sound operations and high-quality development. Guided by the principles of “prevention first, participation by all, and continuous improvement,” the Company has established an occupational health and safety management system and integrates relevant requirements into R&D, manufacturing, engineering construction, equipment operation and maintenance, warehousing, logistics, and other business activities. Through policy implementation, risk prevention and control, and the development of a strong safety culture, the Company enhances its occupational health and safety management. Every employee must comply with applicable laws and regulations, avoid conduct that may endanger their own health or that of others, and immediately report hazardous or harmful work activities, equipment, or workplace conditions to their supervisor or the appropriate Company department.

2、负责任的经营

2. Responsible Business Practices

关于负责任经营的定义与示例

Definition and Examples of Responsible Business Practices

负责任经营是指公司在开展经营活动过程中，坚持诚实守信、公平竞争和依法合规原则，遵守适用法律法规及商业道德要求，维护公平有序的市场环境，保障客户、供应商、合作伙伴及其他利益相关方的合法权益。

Responsible business practices mean conducting business in accordance with the principles of honesty, integrity, fair competition, and legal compliance; observing applicable laws, regulations, and business ethics; maintaining a fair and orderly market environment; and protecting the lawful rights and interests of customers, suppliers, business partners, and other stakeholders.

违反负责任经营原则的行为包括但不限于：

Conduct that violates the principles of responsible business includes, but is not limited to:

- 与竞争对手达成固定价格、限制产量、划分市场、分配客户、操纵招投标等限制或排除市场竞争的协议或安排；
- Entering into agreements or arrangements with competitors to fix prices, restrict output, divide markets, allocate customers, manipulate tenders, or otherwise restrict or eliminate market competition.
- 通过串通投标、围标陪标等方式影响招投标活动的公平性和公正性；
- Undermining the fairness and impartiality of tendering and bidding activities through collusive bidding, bid rigging, sham bidding, or similar practices.
- 实施虚假宣传、夸大产品性能、隐瞒产品缺陷或提供误导性信息，影响客户或其他利益相关方的判断；
- Making false claims, exaggerating product performance, concealing product defects, or providing misleading information that may affect the judgment of customers or other stakeholders.
- 通过盗取、非法获取、披露或使用他人商业秘密、保密信息等方式获取竞争优势；
- Obtaining a competitive advantage by stealing, unlawfully obtaining, disclosing, or using another party's trade secrets or confidential information.
- 利用虚构交易、伪造合同、篡改记录、隐瞒重要事实或提供虚假文件等方式获取商业利益或误导利益相关方；
- Obtaining business benefits or misleading stakeholders through fictitious transactions, forged contracts, altered records, concealed material facts, false documents, or similar means.
- 滥用市场地位、商业资源或信息优势，对客户、供应商或其他市场主体实施不公

平交易行为；

- Abusing market position, commercial resources, or informational advantages to impose unfair trading practices on customers, suppliers, or other market participants.
- 在与客户、供应商、合作伙伴、竞争对手或其他第三方开展业务往来过程中，采取其他违反法律法规、商业道德或公平竞争原则的行为。
- Engaging in any other conduct that violates laws and regulations, business ethics, or fair competition principles in dealings with customers, suppliers, business partners, competitors, or other third parties.

2.1 维护公平竞争

2.1 Maintaining Fair Competition

公司坚持公平竞争原则，遵守反垄断及反不正当竞争相关法律法规，维护公开、公平、有序的市场环境。公司禁止串通投标、虚假宣传、侵犯商业秘密等扰乱市场秩序的行为，并要求员工在与客户、供应商、合作伙伴及竞争对手开展业务往来时秉持诚信和公平原则，不得通过隐瞒事实、滥用信息优势或其他不正当方式获取商业利益。

The Company upholds fair competition and complies with applicable antitrust and unfair competition laws and regulations to maintain an open, fair, and orderly market environment. It prohibits collusive bidding, false advertising, infringement of trade secrets, and other conduct that disrupts market order. Employees must act with honesty and fairness in their dealings with customers, suppliers, business partners, and competitors and must not obtain commercial benefits by concealing facts, abusing informational advantages, or using other improper means.

2.2 抵制垄断行为

2.2 Prohibition of Monopolistic Conduct

公司严格遵守适用的反垄断法律法规，禁止与竞争对手或其他市场主体达成固定价格、划分市场、分配客户、操纵招投标或其他限制竞争的协议或安排。员工在与客户、供应商、竞争对手及其他第三方开展业务往来时，应保持合规意识，主动识别和防范反垄断风险，确保各项经营活动依法合规开展。

The Company strictly complies with applicable antitrust laws and regulations and prohibits agreements or arrangements with competitors or other market participants involving price fixing, market allocation, customer allocation, bid manipulation, or other restrictions on competition. When dealing with customers, suppliers, competitors, and other third parties, employees must remain alert to compliance requirements, identify and mitigate antitrust risks, and ensure that all business activities are conducted lawfully.

2.3 反商业欺诈

2.3 Prevention of Business Fraud

公司坚持诚信经营原则，反对任何形式的欺诈、舞弊及虚假陈述行为。公司及员工不得通过伪造文件、虚构交易、隐瞒重要事实、提供虚假信息或其他不诚信方式获取商业利益、误导利益相关方或损害公司合法权益。

The Company conducts business with integrity and opposes all forms of fraud, misconduct, and misrepresentation. Neither the Company nor its employees may obtain commercial benefits, mislead stakeholders, or harm the Company's lawful interests by forging documents, fabricating transactions, concealing material facts, providing false information, or using other dishonest means.

3、反腐败与商业贿赂

3. Anti-Corruption and Commercial Bribery

公司致力于构建“不敢腐、不能腐、不想腐”的廉洁管理体系，通过制度约束、监督管理和廉洁文化建设，将反腐败与反舞弊要求融入经营管理全过程，持续提升廉洁合规管理水平，营造诚信、透明、廉洁的商业环境。

The Company is committed to establishing an integrity management system that deters corruption, prevents opportunities for corruption, and fosters an unwillingness to engage in corruption. Through institutional controls, oversight, and a culture of integrity, the Company integrates anti-corruption and anti-fraud requirements throughout its operations and management, strengthens integrity and compliance management, and promotes an honest, transparent, and ethical business environment.

公司建立监督检查机制，持续识别、评估、并防范贿赂与腐败风险，绝不容忍任何形式的贿赂、回扣或腐败行为，包括给予或收受任何形式的贿赂、回扣或疏通费。同时，公司定期开展商业道德及反贿赂培训，持续提升员工廉洁合规意识。员工在开展业务活动过程中，应遵守公司廉洁合规管理要求，不得直接或间接向任何个人或组织提供、承诺、索取或收受不当利益。

The Company has established oversight and inspection mechanisms to identify, assess, and mitigate bribery and corruption risks. It does not tolerate any form of bribery, kickback, or corruption, including the offering or acceptance of bribes, kickbacks, or facilitation payments. The Company also provides regular training on business ethics and anti-bribery requirements to reinforce employees' integrity and compliance awareness. In conducting business, employees must comply with the Company's integrity and compliance requirements and must not directly or indirectly offer, promise, solicit, or accept improper benefits from any individual or organization.

关于反腐败与商业贿赂的定义与示例

Definition and Examples of Anti-Corruption and Commercial Bribery

反腐败与商业贿赂是指公司及员工在经营活动中遵循诚实守信、公平交易和廉洁从业原则，禁止利用职务便利、商业资源或其他影响力谋取不当利益，或通过不正当方式影响商业决策、交易结果及监管行为。

违反反腐败与商业贿赂原则的行为包括但不限于：

Conduct that violates anti-corruption and commercial bribery principles includes, but is not limited to:

- 向客户、供应商、合作伙伴、公职人员或其他相关方直接或间接提供现金、礼品、招待、旅游、赞助、佣金、回扣或其他不当利益，以获取商业机会、影响业务决策或获得不正当竞争优势；
- Directly or indirectly providing cash, gifts, hospitality, travel, sponsorships, commissions, kickbacks, or other improper benefits to customers, suppliers, business partners, public officials, or other parties to obtain business opportunities, influence business decisions, or secure an unfair competitive advantage.
- 索取、收受或变相收受客户、供应商、合作伙伴或其他第三方提供的现金、有价证券、礼品、回扣、利益分成或其他不当利益；
- Soliciting, accepting, or indirectly receiving cash, negotiable securities, gifts, kickbacks, profit-sharing arrangements, or other improper benefits from customers, suppliers, business partners, or other third parties.
- 通过顾问、代理商、中介机构、供应商、经销商或其他第三方实施贿赂、利益输送或其他违规行为；
- Using consultants, agents, intermediaries, suppliers, distributors, or other third parties to engage in bribery, improper transfers of benefits, or other misconduct.
- 利用虚假合同、虚构服务、异常付款、账外返利、关联交易等方式掩盖贿赂、回扣或利益输送行为；
- Concealing bribery, kickbacks, or improper transfers of benefits through false contracts, fictitious services, irregular payments, off-book rebates, related-party transactions, or similar arrangements.
- 利用职务便利为本人、家庭成员或其他特定关系人谋取商业机会、优惠条件或其他不当利益，且未按规定进行利益冲突申报；
- Using one's position to obtain business opportunities, preferential terms, or other improper benefits for oneself, family members, or closely related persons without making the required conflict-of-interest disclosure.
- 利用慈善捐赠、赞助、公益活动、培训交流、市场推广等名义实施商业贿赂、利益输送或变相利益交换；
- Using charitable donations, sponsorships, public welfare activities, training and exchange programs, or marketing activities as a pretext for commercial bribery, improper transfers of benefits, or disguised exchanges of benefits.

- 未经授权以公司名义开展政治捐赠，或利用政治捐赠影响政府决策、监管活动或商业机会获取；
- Making political contributions in the Company's name without authorization or using political contributions to influence government decisions, regulatory activities, or the award of business opportunities.
- 参与、协助或纵容洗钱活动，包括隐瞒资金真实来源、协助转移非法所得，或故意与资金来源不明、存在重大合规风险的交易对象开展业务；
- Participating in, assisting, or tolerating money laundering, including concealing the true source of funds, facilitating the transfer of illegal proceeds, or knowingly conducting business with counterparties whose funds are of unclear origin or present significant compliance risks.
- 故意隐瞒、篡改、伪造与廉洁合规相关的业务记录、财务信息或审批文件，以规避监督管理或掩盖违规行为；
- Intentionally concealing, altering, or falsifying business records, financial information, or approval documents relating to integrity and compliance to evade oversight or conceal misconduct.
- 对举报、调查或审计工作进行干扰、阻挠，或对举报人实施打击报复。
- Interfering with or obstructing reporting, investigations, or audits, or retaliating against a whistleblower.

3.1 礼品与招待

3.1 Gifts and Hospitality

公司员工在向客户赠送礼品或安排宴请招待时应保持审慎。相关行为应在符合法律及公司规定的前提下进行，并限于通常的商业交往惯例范围之内。原则上，员工不得向客户赠送贵重礼品或安排过于昂贵的宴请招待。

Employees must exercise caution when giving gifts to customers or arranging meals or other hospitality. Such activities must comply with applicable laws and Company policies and remain within customary and reasonable business practices. As a general rule, employees must not give customers valuable gifts or arrange excessively expensive meals or hospitality.

3.2 反洗钱

3.2 Anti-Money Laundering

洗钱是将非法所得合法化的犯罪行为。公司严格遵守国内外反洗钱相关法律法规，绝不参与任何洗钱活动。公司仅选择与商业信誉良好、资金来源合法的客户开展业务。

Money laundering is the criminal act of disguising illegally obtained proceeds as legitimate funds. The Company strictly complies with applicable domestic and international anti-money laundering laws and regulations and does not participate in any money laundering activity. The Company conducts business only with customers

that have a sound commercial reputation and legitimate sources of funds.

任何员工不得利用公司产品与任何人通过商业活动从事违法用途，例如清洗非法渠道所得资金；在业务开展过程中，应特别关注使用大额现金支付的客户或供应商。一旦发现任何可疑金融交易或活动，应立即向公司报告。

Employees must not use the Company's products or business activities, whether independently or with another party, for unlawful purposes, including laundering funds obtained through illegal channels. Particular attention must be paid to customers or suppliers that make large cash payments. Any suspicious financial transaction or activity must be reported to the Company immediately.

3.3 利益冲突

3.3 Conflicts of Interest

公司要求员工在履职过程中秉持诚信、公正和客观原则，主动识别、避免并妥善管理实际或潜在的利益冲突，确保个人利益不会影响独立判断或损害公司利益及声誉。员工不得利用职务便利谋取不当利益，不得收受客户、供应商、合作伙伴或其他第三方提供的现金、礼品、回扣或其他不当利益；不得在与公司存在业务往来或潜在业务往来的机构中兼职任职；不得利用职务影响为本人、家庭成员或其他存在特定利益关系的人员谋取不当利益；不得将因职务、公司资源、商业信息或商业机会所产生的利益据为己有，或将其用于与公司利益相冲突的活动。对于可能构成利益冲突的情形，员工应按照公司规定及时申报并接受审查。

Employees must perform their duties with integrity, impartiality, and objectivity and must identify, avoid, and properly manage actual or potential conflicts of interest. Personal interests must not compromise independent judgment or harm the Company's interests or reputation. Employees must not use their positions to obtain improper benefits or accept cash, gifts, kickbacks, or other improper benefits from customers, suppliers, business partners, or other third parties. They must not hold concurrent positions in organizations that conduct or may conduct business with the Company; use their influence to obtain improper benefits for themselves, family members, or persons with whom they have a specific interest relationship; or appropriate benefits arising from their position, Company resources, business information, or business opportunities, or use such benefits in activities that conflict with the Company's interests. Any circumstances that may constitute a conflict of interest must be disclosed promptly and submitted for review in accordance with Company requirements.

3.4 政治捐赠

3.4 Political Contributions

公司严格遵守经营所在地关于政治捐赠的法律法规要求。未经公司授权，任何员工不得以公司名义直接或间接向政党、政治组织、候选人或其他与政治活动相关的机构提供资

金、实物、服务或其他形式的支持。公司开展政治捐赠活动（如适用）应履行相应审批程序，并确保相关活动合法、合规、透明，不得以获取不当商业利益或影响政府决策为目的。

The Company strictly complies with laws and regulations governing political contributions in the jurisdictions where it operates. Without Company authorization, no employee may directly or indirectly provide funds, goods, services, or any other form of support in the Company's name to a political party, political organization, candidate, or other entity associated with political activities. Where the Company makes a political contribution, if applicable, the required approval procedures must be followed, and the activity must be lawful, compliant, and transparent. Political contributions must not be used to obtain improper commercial benefits or influence government decisions.

3.5 慈善捐赠与赞助

3.5 Charitable Donations and Sponsorships

公司支持依法合规开展公益慈善、社区发展、教育支持、环境保护等社会公益活动。所有慈善捐赠和赞助活动应基于真实、合理的公益目的，并按照公司授权和审批程序实施，确保资金和资源使用公开透明。任何个人或部门不得利用慈善捐赠、赞助或社会公益活动作为实施商业贿赂、利益输送或获取不当利益的手段。

The Company supports lawful and compliant public welfare activities relating to charitable causes, community development, education, environmental protection, and similar areas. All charitable donations and sponsorships must serve genuine and reasonable public-interest purposes, follow the Company's authorization and approval procedures, and ensure the transparent use of funds and resources. No individual or department may use charitable donations, sponsorships, or public welfare activities as a means of engaging in commercial bribery, transferring improper benefits, or obtaining undue advantages.

4、信息安全与隐私保护

4. Information Security and Privacy Protection

信息安全与隐私保护是公司合规管理的重要组成部分。公司将信息安全与隐私保护纳入合规管理体系，持续完善数据安全、网络安全及个人信息保护机制，确保所有数据处理活动合法合规并受到充分保护，不断提升信息安全管理水平和防护能力。

Information security and privacy protection are integral components of the Company's compliance management. The Company incorporates these matters into its compliance management system and strengthens its data security, cybersecurity, and personal information protection mechanisms to ensure that all data-processing activities are lawful, compliant, and adequately protected. It also enhances its information security management and protective capabilities.

关于信息安全与隐私保护的定义与示例

Definition and Examples of Information Security and Privacy Protection

信息安全与隐私保护是指公司通过制度、技术和管理措施，保障数据、信息系统及个人信息的保密性、完整性和可用性，防止信息遭受未经授权的访问、泄露、篡改、丢失、损毁或滥用，维护公司、客户、员工、供应商及其他相关方的合法权益。

Information security and privacy protection means safeguarding the confidentiality, integrity, and availability of data, information systems, and personal information through policies, technical controls, and management measures. These safeguards prevent unauthorized access, disclosure, alteration, loss, destruction, or misuse and protect the lawful rights and interests of the Company, customers, employees, suppliers, and other relevant parties.

违反信息安全与隐私保护原则的行为包括但不限于：

Conduct that violates information security and privacy protection principles includes, but is not limited to:

- 未经授权访问、复制、下载、披露、修改或删除公司数据、商业秘密、客户信息、员工信息及其他敏感信息；
- Accessing, copying, downloading, disclosing, modifying, or deleting Company data, trade secrets, customer information, employee information, or other sensitive information without authorization.
- 违规收集、使用、存储、传输、共享或处理个人信息，或超出授权范围使用相关数据；
- Collecting, using, storing, transmitting, sharing, or otherwise processing personal information in violation of applicable requirements, or using relevant data beyond the scope of authorization.
- 向无关人员泄露公司保密信息、客户信息、技术资料或其他受保护信息；
- Disclosing the Company's confidential information, customer information, technical materials, or other protected information to unauthorized or unrelated persons.
- 故意绕过、关闭或破坏公司信息安全管理措施，或违规使用非授权软件、设备及存储介质处理公司信息；
- Intentionally circumventing, disabling, or damaging the Company's information security controls, or using unauthorized software, devices, or storage media to process Company information.
- 利用公司信息系统从事违法违规活动，或实施可能危害网络与信息安全的行为；
- Using the Company's information systems for unlawful or non-compliant activities or engaging in conduct that may compromise cybersecurity or information security.
- 发现信息安全事件、系统漏洞、数据泄露或其他安全风险后，未按规定及时报告、

隐瞒事实或拒绝配合调查处理。

- Failing to report an information security incident, system vulnerability, data breach, or other security risk as required, concealing relevant facts, or refusing to cooperate with an investigation or response.

公司坚持数据全生命周期安全管理原则，围绕数据收集、存储、传输、使用、共享、归档及销毁等环节建立管理要求，通过权限管理、身份认证、访问控制、加密保护、备份恢复及安全审计等措施，保障数据的完整性、保密性和可用性，防止数据遭受未经授权的访问、泄露、篡改、丢失或损毁。

The Company applies data security management throughout the data lifecycle and establishes requirements covering data collection, storage, transmission, use, sharing, archiving, and destruction. Measures such as permission management, identity authentication, access controls, encryption, backup and recovery, and security audits are used to protect data integrity, confidentiality, and availability and to prevent unauthorized access, disclosure, alteration, loss, or destruction.

公司持续开展信息安全风险识别、监测和评估工作，建立信息安全事件响应与处置机制，及时识别、报告、调查和应对各类信息安全风险及网络安全威胁，持续提升信息安全事件预防、监测和响应能力。

The Company identifies, monitors, and assesses information security risks and has established mechanisms for responding to and handling information security incidents. Information security risks and cybersecurity threats are identified, reported, investigated, and addressed promptly, strengthening the Company's prevention, monitoring, and response capabilities.

公司明确各层级员工在信息安全和个人信息保护方面的职责与义务，通过制度宣导、培训教育及日常管理，不断提升全员信息安全意识和风险防范能力。公司制定有《信息安全事件管理规定》，为运营过程中发生的信息安全事件的识别、报告、响应与处置活动提供清晰指引，所有员工均应按照公司规定妥善处理和保护公司数据及个人信息，发现疑似信息安全事件、数据泄露或其他安全风险时，应及时向公司报告并配合开展调查和处置工作。

The Company defines the responsibilities and obligations of employees at all levels regarding information security and personal information protection. Policy communication, training, and routine management are used to strengthen information security awareness and risk-prevention capabilities across the workforce. The Company's Information Security Incident Management Rules provide clear guidance on identifying, reporting, responding to, and handling information security incidents arising in the course of operations. All employees must process and protect Company data and personal information properly in accordance with Company requirements. Suspected information security incidents, data breaches, or other security risks must be reported promptly, and employees must cooperate with the resulting investigation and response.

同时，公司要求供应商、承包商等第三方遵守同等信息安全标准，通过协议约束及义务告知，推动第三方落实与公司一致的信息安全和个人信息保护要求，共同维护数据安全与业务连续性。

The Company requires suppliers, contractors, and other third parties to comply with equivalent information security standards. Contractual obligations and formal notifications are used to require third parties to implement information security and personal information protection requirements consistent with those of the Company, thereby safeguarding data security and business continuity.

员工、承包商及其他相关方在发现信息安全事件、系统漏洞、异常活动或其他潜在信息安全风险时，应立即向信息安全负责人、信息安全工程师或信息技术部门报告。信息安全部门负责对事件进行受理、初步评估和分级管理，并根据事件性质组织相关部门开展调查、处置和整改；对于重大及以上信息安全事件，将按照升级机制及时报告管理层，并组建专项调查小组开展应急响应和原因分析，确保信息安全风险得到及时控制和有效处置。

Employees, contractors, and other relevant parties must immediately report any information security incident, system vulnerability, abnormal activity, or other potential information security risk to the person responsible for information security, an information security engineer, or the Information Technology Department. The information security function is responsible for receiving reports, conducting preliminary assessments, and classifying incidents. Depending on the nature of the incident, it will coordinate the relevant departments in conducting investigations, taking remedial action, and implementing corrective measures. Major or higher-severity information security incidents must be escalated promptly to management under the applicable escalation mechanism. A dedicated investigation team will be formed to carry out emergency response and root-cause analysis, ensuring that information security risks are controlled promptly and handled effectively.

5、产品质量管理

5. Product Quality Management

瑞浦兰钧将产品质量与安全视为核心竞争力和客户信任的基础，坚持将安全、可靠和高品质要求贯穿产品全生命周期管理。在产品研发、生产、测试、交付及售后服务等环节，公司严格遵守产品销售和运营所在地关于产品质量、安全及性能的法律法规和监管要求，通过建立并持续完善质量管理体系，确保产品的一致性、可靠性和可追溯性，持续为客户和终端用户提供安全、可靠的产品与服务。

REPT BATTERO regards product quality and safety as core competitive strengths and the foundation of customer trust. Requirements for safety, reliability, and high quality are incorporated throughout the full product lifecycle. Across product R&D, manufacturing, testing, delivery, and after-sales service, the Company strictly complies with applicable laws, regulations, and regulatory requirements concerning product

quality, safety, and performance in the jurisdictions where its products are sold and operated. By establishing and improving its quality management system, the Company ensures product consistency, reliability, and traceability and provides customers and end users with safe and reliable products and services.

关于产品质量管理的定义与示例

Definition and Examples of Product Quality Management

产品质量管理是指公司通过全过程质量控制和持续改进机制, 确保产品在研发、生产、测试、交付及售后服务等环节符合相关法律法规、技术标准及客户要求, 保障产品的安全性、可靠性和一致性。

Product quality management means applying end-to-end quality controls and continuous improvement mechanisms to ensure that products comply with applicable laws and regulations, technical standards, and customer requirements throughout R&D, manufacturing, testing, delivery, and after-sales service, thereby safeguarding product safety, reliability, and consistency.

违反产品质量管理原则的行为包括但不限于:

Conduct that violates product quality management principles includes, but is not limited to:

- 伪造、篡改、隐瞒产品质量、安全、性能测试结果或其他质量记录;
- Falsifying, altering, or concealing product quality, safety, or performance test results or other quality records.
- 明知产品、原材料或生产过程存在质量缺陷、安全隐患或不符合要求, 仍组织生产、交付或投入使用;
- Proceeding with production, delivery, or use despite knowing that a product, raw material, or manufacturing process has a quality defect, safety hazard, or non-conformity.
- 未按照规定执行质量检验、测试验证、过程控制或产品追溯要求;
- Failing to conduct quality inspections, testing and validation, process controls, or product traceability procedures as required.
- 故意隐瞒产品质量问题、客户投诉、安全风险或其他可能影响产品质量与安全的重要信息;
- Intentionally concealing product quality issues, customer complaints, safety risks, or other material information that may affect product quality or safety.
- 违反适用法律法规、技术标准或公司质量管理要求, 导致产品质量、安全或合规风险。
- Violating applicable laws and regulations, technical standards, or Company quality management requirements in a manner that creates product quality, safety, or compliance risks.

6、可持续发展

6. Sustainable Development

可持续发展是瑞浦兰钧的重要理念之一。瑞浦兰钧致力于在产品 & 原材料研发、生产、储存、运输及使用过程中预防或持续减少对环境的影响。同时，在建设、运营、改建或扩建生产设施时，公司同样秉持上述原则，避免任何违法排放行为。公司鼓励员工在工作与生活中履行环保义务和责任，积极践行低碳生活方式。

Sustainable development is one of REPT BATTERO's core principles. The Company seeks to prevent or reduce environmental impacts arising from the R&D, production, storage, transportation, and use of products and raw materials. The same principles apply to the construction, operation, renovation, and expansion of manufacturing facilities, and the Company prohibits any unlawful discharge or emission. Employees are encouraged to fulfil their environmental responsibilities at work and in their daily lives and to adopt low-carbon lifestyles.

关于可持续发展的定义与示例

Definition and Examples of Sustainable Development

可持续发展是指公司在经营管理过程中统筹经济效益、环境保护和社会责任，将资源节约、环境保护和绿色低碳理念融入产品全生命周期及日常运营活动，持续降低对环境和社会的负面影响，推动企业长期稳健发展。

Sustainable development means balancing economic performance, environmental protection, and social responsibility in business management; integrating resource conservation, environmental protection, and green and low-carbon principles into the full product lifecycle and daily operations; reducing adverse environmental and social impacts; and supporting the Company's sound long-term development.

违反可持续发展原则的行为包括但不限于：

Conduct that violates sustainable development principles includes, but is not limited to:

- 违反环境保护、能源管理、污染物排放、废弃物处置等相关法律法规或公司管理要求；
- Violating laws, regulations, or Company requirements relating to environmental protection, energy management, pollutant emissions, or waste disposal.
- 非法排放废气、废水、噪声或违规处置废弃物，造成环境污染或生态破坏；
- Unlawfully discharging air emissions, wastewater, or noise, or improperly disposing of waste in a manner that causes environmental pollution or ecological damage.
- 故意隐瞒、篡改或伪造环境、能源、资源使用及其他可持续发展相关数据和记录；
- Intentionally concealing, altering, or falsifying data or records relating to the

environment, energy, resource use, or other sustainability matters.

- 浪费能源、水资源、原材料等生产经营资源，或实施明显违背资源节约和循环利用原则的行为；
- Wasting energy, water, raw materials, or other operational resources, or engaging in conduct that clearly conflicts with the principles of resource conservation and circular use.
- 发现环境、安全或其他可持续发展风险后未按规定及时报告、处置或配合整改，导致风险扩大或产生不良影响。
- Failing to report or address environmental, safety, or other sustainability risks promptly, or failing to cooperate with corrective action as required, resulting in the escalation of risks or adverse impacts.

六、政策实施与迭代

VI. Policy Implementation and Review

公司每 2 年联合外部专家对本政策进行修订，并广泛征询外部利益相关方意见，确保政策内容与行业发展趋势、监管要求和利益相关方期望保持一致。发生重大业务调整，如设立海外工厂、并购整合等情形后，公司将及时组织本政策适配性评估，并在必要时及时修订，以适应新的经营环境和管理需求。

The Company will review and revise this Policy every two years in consultation with external experts and will seek input from a broad range of external stakeholders to ensure that its content remains aligned with industry developments, regulatory requirements, and stakeholder expectations. Following major business changes, such as the establishment of overseas manufacturing facilities or mergers and acquisitions, the Company will promptly assess whether the Policy remains appropriate and revise it where necessary to reflect the new operating environment and management requirements.

版本更新履历 (Version History)		
版本号 Version	变更内容 Change	生效日期 Effective date
1.0	新建 Initial issuance	2024 年 06 月 June 2024
2.0	增加可持续发展承诺与要求	2025 年 12 月

	Added sustainable development commitments and requirements	December 2025
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合规承诺函

Compliance Acknowledgment and Commitment

本人已认真阅读并充分理解《商业行为准则》的全部内容，承诺在履行岗位职责和开展业务活动过程中，严格遵守本准则及公司相关制度要求，秉持诚信、合规、审慎的原则开展各项工作，并恪守职业道德和商业行为规范。

I confirm that I have carefully read and fully understood the entire Code of Business Conduct. In performing my duties and conducting business activities, I undertake to comply strictly with this Code and the Company's related policies, to carry out my work with integrity, compliance, and due care, and to observe professional ethics and standards of business conduct.

本人理解并认可，违反本准则或相关法律法规要求，可能导致相应的管理措施、纪律处分，情节严重的，公司有权依法解除劳动关系，并保留追究相关法律责任的权利。

I understand and acknowledge that a violation of this Code or applicable laws and regulations may result in appropriate management measures or disciplinary action. In serious cases, the Company has the right to terminate the employment relationship in accordance with the law and reserves the right to pursue any applicable legal liability.

本人承诺，如发现任何涉嫌违反本准则、公司制度或法律法规的行为，将及时通过公司规定的举报或反馈渠道进行报告。同时，在公司开展相关调查、审计或核查工作时，本人将积极配合，如实提供相关信息、资料及必要协助，共同维护公司合规经营和良好商业环境。

I undertake to report promptly, through the reporting or feedback channels designated by the Company, any conduct suspected of violating this Code, Company policies, or applicable laws and regulations. I will also cooperate fully with any related investigation, audit, or review conducted by the Company and will provide truthful information, documents, and any necessary assistance to help maintain compliant operations and a sound business environment.

本人签字:

Signature:

日期:

Date: