

吉林电力股份有限公司商业道德管理政策

Business Ethics Management Policy of Jilin Electric Power Co., Ltd.

《吉林电力股份有限公司商业道德管理政策》（以下简称“商业道德管理政策”）阐明了吉林电力股份有限公司（以下简称“吉电股份”“本公司”“我们”或“公司”）在全部经营领域和所有运营地的合规愿景与合规理念。我们承诺严格遵守国家及业务运营地所在国家（地区）的法律法规并承诺支持包括联合国全球契约（UNGC）十项原则中有关适用的国际准则，我们十分注重我们的商业行为对内外部利益相关方所带来的影响。我们承诺通过公开、透明、诚信的信息披露，以负责任的态度明确我们的员工和公司运营活动中应当遵守的各项行为准则，从而推动吉电股份的规范化管理和业务的可持续、高质量发展。

The *Business Ethics Management Policy of Jilin Electric Power Co., Ltd.* (hereinafter referred to as the "Business Ethics Management Policy" or "the/this Policy") sets forth the compliance vision and principles of Jilin Electric Power Co., Ltd. (hereinafter referred to as "Jilin Electric Power," "the Company," "we," or "our Company") across all business sectors and operational locations. We commit to strictly adhering to the laws and regulations of China and the countries or regions where we operate, as well as supporting the applicable international standards in the *Ten Principles of the United Nations Global Compact (UNGC)* and other provisions. We attach great importance to the impact of our business practices on both internal and external stakeholders. Therefore, we pledge to disclose information in an open, transparent, and honest manner, taking up the responsibility to clarify the code of conduct that our employees and operational activities must follow. This commitment fosters the regulated management of Jilin Electric Power and promotes sustainable and high-quality business development.

我们将每年根据自身业务发展、行业惯例及同行最佳实践及时对商业道德管理政策进行审视和更新。

We will review and update the Business Ethics Management Policy annually, based on our business development, industry practices, and the best practices of our peers.

一、适用群体

I. Applicability

商业道德管理政策适用于以下群体：

The Business Ethics Management Policy applies to the following groups:

吉电股份全体员工

All employees of Jilin Electric Power

吉电股份董事会成员、公司各层级管理人员

Members of the Board of Directors and management at all levels of Jilin Electric Power

➤ 吉电股份的业务合作伙伴

- Business partners of Jilin Electric Power

二、 适用范围

II. Scope of Application

商业道德管理政策适用于以下情形：

The Business Ethics Management Policy applies to the following circumstances:

- 以公司名义开展的一切对外活动
- All external activities carried out in the name of the Company
- 公司内部一切经营相关活动
- All internal activities related to the Company's operations
- 员工私下涉及公司信息的一切活动
- All activities in which employees engage with the Company's information in a private capacity

三、 声明

III. Statement

制定本政策是为了确保吉电股份遵守所有运营地所适用的各项法律法规，并实施和执行有效的举措，以确保公司在所有运营地开展相关业务均能以合规、公平、诚信的方式进行。

The purpose of this Policy is to ensure that Jilin Electric Power complies with all applicable laws and regulations in the regions where it operates, and to implement effective measures that guarantee all business activities are conducted in a compliant, fair, and honest manner.

我们在商业道德管理政策中规定了最低标准。一是公司所在运营地法律法规不及商业道德管理政策严格的情况下，也必须遵守该政策所规定的内容。二是运营地当地法律法规较商业道德管理政策更为严格，则应当在本政策之上，严格遵守所在地的法律法规。

We have established minimum standards of conduct. First, where local laws and regulations are less stringent than those outlined in this Policy, the provisions of this Policy must still be observed. Second, if local laws and regulations are more rigorous standards, the Company will comply with those local requirements in addition to adhering to this Policy.

依照相应工作职能，所有适用人群均应阅读、知悉并确认遵守本政策。所有适用人群若发现公司内出现违背本政策的行为，应当保持客观公正，及时向有关部门报告发现的异常行为，以保障公司利益、声誉、风险控制的有效性及其可持续发展。

All applicable individuals are required, according to their respective job responsibilities, to read, familiarize themselves with and adhere to this Policy. If any applicable individual observes

behaviors that violate this Policy within the Company, it is the responsibility of those involved to objectively and promptly report the issue to relevant departments, thereby safeguarding the Company's interests, reputation, risk management, and sustainable development.

举报电话	0431-81962579
Reporting hotline	0431-81962579

四、 诚信经营

IV. Integrity

吉电股份以诚信经营为荣，恪守商业道德，坚持公平竞争，依法纳税，切实保障客户隐私。

Jilin Electric Power takes pride in operating with integrity, strictly adhering to business ethics, upholding fair competition, paying taxes in accordance with the law, and fully safeguarding client privacy.

4.1 公司要求全体员工签署《合规承诺书》，公司承诺每年至少开展 1 次合规培训，提高全体员工合规意识和职业道德；

4.1 The Company requires all employees to sign the *Compliance Commitment*. It promises to conduct at least one compliance training session annually to enhance employees' awareness of compliance and professional ethics.

4.2 公司已经出台《吉林电力股份有限公司领导人员选拔任用管理规定》，建立了公平的岗位竞选和任免程序，禁止参与共谋、合谋、相互勾结等行为，反对和杜绝不正当竞争。我们不允许出现以下行为：

4.2 The Company has issued the *Regulations on the Selection and Appointment of Leaders of Jilin Electric Power Co., Ltd.*, establishing fair procedures for the selection, appointment, and dismissal of positions. We prohibit collusion, conspiracy, and other unethical practices, and oppose and eliminate all forms of unfair competition. The following actions are explicitly prohibited:

- 向竞争对手透露公司内部信息、商业伙伴往来情况、经营安排等。
- Disclose our Company's internal information, business dealings with partners, or operational arrangements to competitors.
- 以偷窃、侵入、偷听、贿赂、胁迫等不正当手段获取竞争对手的有关情报。
- Gain intelligence about competitors through improper means such as theft, hacking, eavesdropping, bribery, or coercion.
- 恶意中伤、诽谤和造谣竞争对手。
- Engage in malicious defamation, slander, or rumor-mongering against competitors.

- 参与垄断协议的签订和执行。
- Participate in the signing or implementation of monopolistic agreements.
- 滥用市场支配地位开展一系列违规行为。
- Abuse market dominance to engage in unlawful conduct.
- 盗用竞争对手商标、专利及知识产权。
- Misappropriate competitors' trademarks, patents, or intellectual property.

4.3 公司承诺认真遵守运营地各项法律法规，严格履行纳税义务并落实运营地的税收政策，分析税务风险，按时申报和缴纳税项，杜绝非法避税和逃税行为。公司承诺一切纳税申报、税款缴纳与税务事项的会计处理、经营决策和日常经营活动考虑的税收因素影响，符合税法规定。公司将严格依照内部税务管理体系及出台的《吉林电力股份有限公司税务管理实施细则》制度要求，按时开展税务风险评估、税务业务培训及税务信息披露等，密切跟踪运营地税务政策及法律法规的最新规定，严格参照现行法律、解释公告、官方指引和商业惯例，适用通用的税率计算应纳税项。

4.3 The Company is committed to rigorously complying with all laws and regulations in its operating regions, fulfilling its tax obligations, and adhering to local tax policies. We analyze tax risks, file and pay taxes on time, and eliminate illegal tax evasion and avoidance. The Company ensures that all tax-related matters, including tax filings, payments, accounting treatments, and the impact of tax-related factors in business decisions and daily operations, are compliant with tax laws. By strictly following the internal tax management system and the requirements of the issued *Tax Management Guidelines of Jilin Electric Power Co., Ltd.*, the Company will conduct regular tax risk assessments, provide tax-related training, and disclose relevant tax information. We also closely monitor the latest changes in local tax policies and regulations, ensuring compliance with applicable laws, interpretations, official guidelines, and business practices for accurate tax computation and payment at the applicable general tax rates.

4.4 我们承诺不断完善信息安全管理体系统，完善公司信息安全保护制度，以防止员工、客户、供应商等其他相关方的隐私发生泄漏。公司建立了《吉林电力股份有限公司网络安全管理规定》《吉林电力股份有限公司网络安全应急实施办法》《吉林电力股份有限公司网络安全信息通报实施办法》等制度，采取了相应的信息安全措施，推行网络安全集中管控。统一采购正版办公软件，建立了有关电脑管理、信息账户管理等要求，加强信息安全管理，避免出现信息安全事故。在未经客户同意的情况下，不随意收集、存储、处理、传输和分享客户相关信息；公司在存储客户电子版相关信息时，应当设置密码保护；公司在存储客户纸质版相关信息时，需进行上锁管理。

4.4 We stay committed to continuously improving our information security management system and enhancing the Company's information protection policies to prevent privacy breaches involving employees, clients, suppliers, and other relevant stakeholders. The Company has

established several policies, including the *Regulations on Cybersecurity Management of Jilin Electric Power Co., Ltd.*, the *Implementation Measures for Cybersecurity Emergency Response of Jilin Electric Power Co., Ltd.*, and the *Implementation Measures for Cybersecurity Information Reporting of Jilin Electric Power Co., Ltd.* We ensure the centralized procurement of licensed office software and have set requirements for computer management and information account management to strengthen information security and prevent security incidents. Without client consent, we do not collect, store, process, transmit, or share any client-related information. Moreover, all electronically stored client data is password-protected, and physical records are kept securely locked.

五、 反腐败贿赂行为

V. Anti-Corruption and Anti-Bribery

吉电股份反对一切形式的腐败、贿赂和欺诈行为，对相应违法违规行为持“零容忍”态度。

Jilin Electric Power opposes all forms of corruption, bribery, and fraud, and maintains a zero-tolerance stance towards any violations of laws and regulations.

5.1 公司严格落实中央、国家部委及国家电力投资集团有限公司出台的有关防止腐败、贿赂及舞弊的相关法律法规、制度及政策，在此基础上建立了包括《吉林电力股份有限公司廉洁风险防控管理实施办法》《吉林电力股份有限公司党风廉政建设责任制管理规定》在内的多项制度，倡导诚信正直的企业文化，促进公司员工树立廉洁、高尚的工作及生活作风，杜绝贪污腐败行为。

5.1 The Company strictly implements the anti-corruption, anti-bribery, and anti-fraud laws, regulations, policies and systems established by China's central government, national ministries, and the State Power Investment Corporation Limited (SPIC). In this context, we have developed multiple policies, including the *Implementation Measures for Integrity Risk Control and Management of Jilin Electric Power Co., Ltd.* and the *Regulations on the Responsibility System for the Improvement of the Party's Conduct and Clean Governance of Jilin Electric Power Co., Ltd.* These policies promote a corporate culture of integrity and honesty, encouraging employees to uphold ethical conduct in both their professional and personal lives, thereby eliminating corruption and misconduct.

5.2 我们对一切腐败、贿赂和舞弊行为持“零容忍”态度，禁止提供或接受不正当的支付或礼物。我们制定了《吉林电力股份有限公司收受现金及贵重物品上交登记管理实施办法》规范管理员工因工作原因收到对方（包括礼券、礼金、赠品、样品等）、奖励等。

5.2 We uphold a zero-tolerance attitude towards all forms of corruption, bribery, and

fraud, and prohibit the offering or acceptance of improper payments or gifts. The Company has implemented the *Implementation Measures for the Registration and Submission of Cash and Valuables Received by Employees of Jilin Electric Power Co., Ltd.*, which regulates the handling of gifts or rewards (including gift vouchers, cash, promotional items, samples, etc.) received by employees during their work.

5.3 公司禁止内部员工以私人身份向任何与本公司业务往来的人员、公司或机构索取或收受任何利益。

5.3 The Company prohibits employees from soliciting or accepting any personal benefits in their private capacity from individuals, companies, or institutions that conduct business with Jilin Electric Power.

5.4 公司承诺每年开展不少于 1 次开展包括董事会及公司高级管理层在内的全员反贪腐、反舞弊教育，积极倡导专业、公平和道德的商业行为。

5.4 We are committed to conducting at least one anti-corruption and anti-fraud training session each year for all employees, including the Board of Directors and senior management, to actively promote professional, ethical, and fair business practices.

5.5 我们鼓励员工通过本政策列明的举报渠道报告相关违规行为并将严格执行吹哨人（举报人）保护程序。

5.5 We encourage employees to report any violations through the reporting channels specified in this Policy and will strictly enforce whistleblower protection procedures.

六、反洗钱

VI. Anti-Money Laundering

吉电股份反对一切不正当的收入来源，严格遵守所有运营地有关反洗钱的法律法规。

Jilin Electric Power opposes all illicit sources of income and strictly complies with anti-money laundering laws and regulations in the regions where it operates.

6.1 我们不允许公司任何员工、高级管理人员、董事会成员等参与洗钱活动或帮助他人进行洗钱活动。

6.1 We do not permit any employee, senior management personnel, or Board member to engage in or assist others with money laundering activities.

6.2 我们已建立完备的风险控制程序，从纪检监察、财务、审计等角度严密监视异常交易的发生并确保及时报告发现的异常交易或疑似洗钱行为。

6.2 We have established comprehensive risk control procedures to closely monitor suspicious transactions from the perspectives of disciplinary inspection, finance, and auditing, ensuring the timely reporting of any detected unusual transactions or suspected

money laundering activities.

七、 利益冲突管理

VII. Conflict-of-Interest Management

吉电股份致力于减少一切利益冲突的发生。

Jilin Electric Power is dedicated to minimizing all instances of conflicts of interest.

7.1 我们建立了《吉林电力股份有限公司领导人员监督管理规定》等制度文件，减少利益冲突事件的发生。

7.1 We have established policies such as the *Regulations on Supervision and Management for Leaders of Jilin Electric Power Co., Ltd.* and other relevant documents to reduce the occurrence of conflict-of-interest incidents.

7.2 我们禁止公司员工利用职务、工作之便将亲属违规安排到公司工作，或要求有业务往来的单位为亲友安排工作、提供便利或优惠条件。

7.2 We prohibit employees from using their positions or work-related advantages to improperly arrange employment for relatives within the Company or to request business partners to provide employment, convenience, or preferential treatment for their relatives or friends.

7.3 互为亲属关系的人员不得在直接管理、监督或上下级关系等有职责或利益冲突的岗位上任职。在日常工作开展过程中涉及利害关系的，互为亲属关系的人员应当主动回避，相关当事人、单位也有权要求回避。

7.3 Relatives are not permitted to hold positions that involve direct management, supervision, or a superior-subordinate relationship, where a potential conflict of interest may arise. In situations involving such conflicts of interest during daily operations, relatives are required to voluntarily recuse themselves, and related parties or departments have the right to request their recusal.

八、 举报人保护

VIII. Whistleblower Protection

吉电股份承诺保护举报人各项合法权益，制定了《吉林电力股份有限公司问题线索管理处置工作办法》规范公司在受理和查处群众举报的工作流程，吉电股份下属各部门及单位应当按照各自职责，相互配合，共同做好举报人合法权益保护工作。

Jilin Electric Power is devoted to protecting the legal rights of whistleblowers. The Company has formulated the *Measures for Managing and Handling Leads regarding Problems of Jilin Electric Power Co., Ltd.* to standardize the procedures for handling and investigating whistleblower reports. All departments and subsidiaries of Jilin Electric Power

must cooperate, within their respective responsibilities, to ensure the effective protection of whistleblowers' legal rights and interests.

8.1 各有关部门应当遵守保密原则，不外泄举报人反映的情况和问题，不将待定的处理情况泄露，指派专人负责举报电话及举报邮箱的日常管理，对举报人的各项有关情况予以严格保密。

8.1 All relevant departments must adhere to the principle of confidentiality, ensuring that the concerns and issues raised by whistleblowers are not disclosed, and that any pending investigation or results remain confidential. Designated personnel are responsible for the daily management of the whistleblower hotline and email system, and all information related to whistleblowers must be strictly kept confidential.

8.2 各涉及的业务部门及工作人员在接受举报和查处举报事件时，应当遵守保密规定，不准私自摘抄、复制举报材料，严防泄漏举报信息和遗失举报材料。确因工作需要查阅举报人相关资料的，经相关部门批准同意后，应对查阅人员查阅的内容、时间及相关情况进行登记。

8.2 All relevant departments and personnel involved in receiving and investigating whistleblower reports must strictly follow confidentiality regulations. Unauthorized copying, sharing, or reproducing of whistleblower materials is strictly prohibited, and all efforts must be made to prevent leaks or loss of such materials. If there is a legitimate work-related need to access whistleblower information, approval from the relevant departments must be obtained, and details of the access, including the content and time, must be duly recorded.

8.3 我们不允许以任何借口对举报人实施打击、报复。举报人在协助调查工作中受到保护，禁止被举报方对参与调查的员工实施任何形式干扰、恐吓、阻碍工作或采取敌对措施。对违规泄露举报人员信息或对举报人员采取打击报复的人员，将视情节予以警告、纪律处分、撤职、解除劳动合同直至移送司法机关。

8.3 We do not tolerate any form of retaliation or reprisal against whistleblowers under any pretext. Whistleblowers are protected during investigations, and the accused parties are prohibited from interfering with, intimidating, or obstructing employees involved in the investigation, or taking any hostile actions against them. Individuals found to have breached whistleblower confidentiality or retaliated against whistleblowers will face consequences, including warnings, disciplinary actions, dismissal, termination of employment contracts, or, in severe cases, referral to judicial authorities.

九、生效

IX. Effectiveness

本政策于 2024 年 7 月 27 日经公司党委会讨论通过后公布。

This policy will take effect upon its announcement following approval by the Company's Party Committee on July 27, 2024.