

Zhongji Innolight Co., Ltd.
Anti-Bribery and Corruption Policy

中际旭创股份有限公司
反贿赂与反腐败政策

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1. Introduction 介绍

1.1 Policy Statement 政策声明

It is Zhongji InnoLight Co., Ltd. and its subsidiaries and affiliates ("InnoLight Group")'s policy to carry out business fairly, honestly and openly, everywhere around the world. As such the InnoLight Group has a zero-tolerance approach towards bribery and corruption in any part of its operations.

中际旭创股份有限公司及其子公司与关联公司（以下简称“中际旭创集团”或者“中际旭创”）的政策是在全球范围内以公平、诚信和公开的方式开展业务。因此，中际旭创对其运营中任何环节的贿赂和腐败行为均采取零容忍态度。

To meet this commitment, the InnoLight Group has implemented Anti-Bribery and Corruption Policy ("ABC Policy") and procedures.

为了履行此承诺，中际旭创集团已制定相应的反贿赂与反腐败政策和流程。

1.2 Purpose 目的

This ABC Policy has been produced to:

本《反贿赂与反腐败政策》旨在：

- (1) provide a clear statement of the InnoLight Group's position on bribery and corruption, i.e. that bribery and corruption will not be tolerated in any circumstances;
明确中际旭创集团对贿赂和腐败的立场，即在任何情况下都绝不容忍贿赂和腐败；
- (2) ensure compliance with anti-bribery laws, rules and regulations in those countries where the InnoLight Group may carry out its business or in relation to which its business may be connected;
确保中际旭创集团遵守开展业务所在国家，或业务可能涉及的国家所适用的反贿赂法律法规、条例及规则；
- (3) provide information and guidance to InnoLight Staff and Associated Persons (as defined below) to allow them to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others;
向“中际旭创员工”及“关联人士”（定义见下文）提供信息和指导，使其充分了解与贿赂相关的风险，并鼓励其对自身或者他人可能存在的的行为保持警惕，有效识别、防范或举报；
- (4) raise awareness amongst InnoLight Staff and Associated Persons that contracting with Third Parties (as defined below), can create an increased risk of bribery and corruption. This ABC Policy has been created to reduce this risk;
提高中际旭创员工和关联人士的意识，使其认识到与“第三方”（定义见下文）合作可能带来更高的贿赂和腐败风险。本 ABC 政策正是为降低此类风险而制定；
- (5) provide suitable and secure reporting and communication channels and ensure that any information that is reported is properly and effectively dealt with; and

提供安全可靠的举报与沟通渠道，并确保所有举报信息都能得到妥善有效的处理；
以及

- (6) create and maintain a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

建立并维护一套严格有效的机制，以应对任何涉嫌贿赂或腐败的情况。

1.3 Scope 范围

All directors, officers, employees, and interns of the InnoLight Group (collectively referred to as “InnoLight Staff”) are required to comply with this ABC Policy. InnoLight Staff in managerial or supervisory positions (hereinafter referred to as “Supervisors”) must also ensure that InnoLight Staff under their supervision comply with this ABC Policy and all relevant ABC Laws (as defined below).

中际旭创集团的所有董事、高管、员工及实习生（统称为“中际旭创员工”）均须遵守本 ABC 政策。担任管理或监督职责的中际旭创员工（以下简称“主管人员”）还须确保其管辖下的员工遵守本 ABC 政策及其所有相关的反贿赂与反腐败法律法规（ABC 法规，定义见下文）。

The InnoLight Group also expects anyone who acts or provides services for, or on behalf, or in the interest, of the InnoLight Group in any capacity, wherever located – including but not limited to joint venture and other business partners, agency workers, agents, contractors, distributors and consultants (“Associated Persons”) – to comply with all applicable ABC Laws and this ABC Policy. 中际旭创亦期望任何以任何形式代表中际旭创行事、为其提供服务或以其名义或利益行事的个人或实体（无论其所在地为何），包括但不限于合资企业及其他商业合作伙伴、派遣员工、代理商、承包商、分销商和顾问（统称为“关联人士”），均须遵守所有适用的 ABC 法规及本 ABC 政策。

1.4 General Requirements 一般要求

The InnoLight Group is committed to transacting business with integrity and acting ethically and legally in accordance with all applicable ABC Laws. It is important that the InnoLight Group complies at all times with the laws of each jurisdiction in which it operates.

中际旭创致力于诚信经营，并依照所有适用的 ABC 法规秉持道德和合法的行为准则。中际旭创始终遵守其运营所在各司法管辖区的法律法规，这一点至关重要。

InnoLight Staff must also follow all applicable standards, principles, laws and practices for accounting and financial reporting. In particular, no payment is to be made for any purpose other than that described in the InnoLight Group’s financial records and all payments should be recorded with sufficient and accurate detail. No undisclosed or unrecorded accounts are to be established for any purpose. False or artificial entries are not to be made in the InnoLight Group’s financial records for any reason.

中际旭创员工还必须遵守所有适用于会计与财务报告的标准、原则、法律法规及实务要求。特别是，任何付款的目的均不得与其在中际旭创财务记录中所载明的目的不符，且所有付款均应以充分、准确的细节予以记录。不得以任何目的设立未披露或未记账的账户。无论出于何种原因，均不得在中际旭创的财务记录中制作虚假或人为编造的账目。

The [Internal Control Department] will be primarily responsible for the oversight and enforcement of this ABC Policy. Any questions about this ABC Policy shall be referred to [Internal Control Department] in the first instance.

内控部门将主要负责本 ABC 政策的监督和执行。有关本 ABC 政策的任何问题，请首先咨询内控部门。

This ABC Policy will be subject to review by Internal Control Department at least once every year and may be revised whenever necessary to ensure its effectiveness, that any relevant developments are taken into account and that it is meeting the InnoLight Group Policy Statement and Purpose set out above.

本 ABC 政策将由内控部门至少每年审查一次，并可根据需要随时进行修订，及时纳入相关最新发展，并符合上文所述的中际旭创集团的政策声明及目的，以确保有效性。

2. Definitions 定义

Term 术语	Definition 定义
ABC Laws ABC 法规	<p>ABC Laws include: ABC 法规包括:</p> <ol style="list-style-type: none"> (1) the Criminal Law of the People's Republic of China; 《中华人民共和国刑法》 (2) the Anti-Unfair Competition Law of the People's Republic of China 《中华人民共和国反不正当竞争法》 (3) Singapore's Prevention of Corruption Act 1960 (the "PCA"); 新加坡 1960 年《防止腐败法》 (PCA) (4) Singapore's Penal Code 1871 新加坡 1871 年《刑法典》 (5) Singapore's Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act 1992 新加坡 1992 年《腐败、贩毒及其他严重犯罪所得法》 (6) the US Foreign Corrupt Practices Act (the "U.S. FCPA") 美国《反海外腐败法》 (U.S. FCPA) (7) the United Kingdom's Bribery Act of 2010 (the "UK Bribery Act"); and 英国 2010 年《反贿赂法》 (UK Bribery Act) 以及 (8) all other applicable anti-corruption laws in overseas jurisdictions where the InnoLight Group operates. 中际旭创开展业务的其他境外司法辖区所有适用的反腐败法律。 <p>ABC Laws may apply extraterritorially. By way of illustration, the PCA applies extraterritorially to acts of corruption by Singapore citizens. Hence, a Singapore citizen who commits an offence under the PCA outside of Singapore may be punished as if that offence had been committed within Singapore. The UK Bribery Act and U.S. FCPA can be enforced by domestic regulators extraterritorially and could also impact the InnoLight Group.</p>

	<p>ABC 法律可能具有域外效力。例如，新加坡的《防止腐败法》对于新加坡公民在境外实施的腐败行为具有域外适用效力。因此，若一名新加坡公民在新加坡境外触犯了《防止腐败法》，其将如同在新加坡境内犯罪一样收到惩处。英国《反贿赂法》和美国《反海外腐败法》也可由本国监管机构进行域外执法，并可能对中际旭创产生影响。</p>
<p>Bribery 贿赂</p>	<p>The term “bribery” refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage in order to induce or influence an action or decision.</p> <p>“贿赂”一词，系指为诱使或影响某项行为或决定，而提供、给予、承诺、索取、同意接收、接受或要求具有价值或优势的物品或利益的行为。</p> <p>The term “a bribe” refers generally to any inducement, reward, object/item or service of value offered or provided to another individual or entity in order to gain commercial, contractual, regulatory, or personal advantage.</p> <p>“贿赂物”一词，通常指的是为获取商业、合同、监管或个人方面的优势，而向他人或实体提供或给予的任何形式的有价值利益、报酬、实物或服务。</p> <p>“Bribery” is not limited to the act of offering “a bribe.” An individual who solicits or receives “a bribe” also commits an offence.¹</p> <p>“贿赂”不仅限于提供“贿赂物”的行为。索取或收受“贿赂物”的个人同样构成违法行为。</p>
<p>Corruption 腐败</p>	<p>The term “corruption” is used where the offer, payment, promise, or gift, is intended to induce the recipient to misuse his official position.</p> <p>“腐败”一词，系指提议、支付、承诺或赠与利益的行为，旨在诱使接收方滥用其职务权力。</p>

¹ Examples of actions that might be problematic under this ABC Policy include the following:

- (i) Paying or offering cash to a Public Official responsible for issuing the InnoLight Group a license or contract to influence the Public Official's decision to issue the license or award business.
- (ii) Giving a gift to a tax agent to influence his or her decision regarding how much the InnoLight Group owes in taxes.
- (iii) Intentionally overpaying for supplies from a vendor owned by a Public Official to influence that Public Official's decision to continue to refer business to the InnoLight Group.
- (iv) Flying a customer representative and their family at the InnoLight Group's expense in order to influence the customer to award business to the InnoLight Group.
- (v) Taking the employee responsible for purchasing at a state-owned company to an expensive dinner or sporting event to influence them to award business to the InnoLight Group.
- (vi) Making a donation to a political candidate in return for the candidate's promise to give favourable regulatory treatment to the InnoLight Group upon election.
- (vii) Any action the same or similar to the above made through a Third Party.

根据本 ABC 政策，以下行为可能构成违规：

- (i) 向负责向中际旭创集团颁发许可证或授予合同的公职人员支付或提供现金，以影响该公职人员颁发许可证或授予业务的决定。
- (ii) 向税务顾问或官员赠送礼品，以影响其对中际旭创集团应缴税款金额的判定。
- (iii) 故意以高于市场价的价格向由公职人员拥有的供应商采购物资，以影响该公职人员继续将业务推荐给中际旭创集团的决定。
- (iv) 由中际旭创集团承担费用，为某客户代表及其家人安排航班旅行，以促使该客户将业务授予中际旭创集团。
- (v) 邀请国有企业的采购负责人参加昂贵的晚餐或体育赛事，以促使该客户将业务授予中际旭创集团。
- (vi) 向某政治候选人进行捐赠，以换取其当选后对中际旭创集团给予优惠或偏向性的监管待遇。
- (vii) 通过第三方实施的与上述行为相同或类似的行为。

Facilitation Payment 疏通费	<p>A small unofficial bribe, also called a “facilitating”, “speed” or “grease” payment made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.</p> <p>“疏通费”，系指为保障或加快获得付款方依法或依规本应享有的例行或必要服务而支付的小额非正式贿赂，亦称“加速费”或“通融费”。</p>
Gratification 好处	<p>Any item of value regardless of its form. Gratification can include the following:</p> <p>指任何形式的有价之物。好处可以包括以下内容：</p> <ul style="list-style-type: none"> (1) any cash or cash equivalent, gift, loan, fee, reward, commission, or other property or interest; 任何现金或现金等价物、礼品、贷款、费用、报酬、佣金或其他财产或权益； (2) any offer of employment or contract or position; 任何就业、合同或职位的提供； (3) any payment, release, discharge or liquidation of any loan, obligation or other liability whatsoever, whether in whole or in part; and 任何贷款、债务或其他责任的全部或部分支付、免除、清偿，以及 (4) any other service, favour or advantage of any description whatsoever. 任何其他形式的服务、照顾或利益。
Third Party/Parties 第三方	<p>Any (prospective or potential) individual not employed by the InnoLight Group and/or any entity not owned or controlled by the InnoLight Group, that provides services or goods to the InnoLight Group or on behalf of the InnoLight Group or engages in business activities with the InnoLight Group or InnoLight Staff.</p> <p>指任何（现有的或潜在的）非中际旭创集团的个人，和/或任何非由中际旭创集团拥有或控制的实体，只要其向中际旭创集团提供商品或服务、代表中际旭创集团行事，或与中际旭创集团或中际旭创员工开展业务活动，均视为第三方。</p>
Intermediary or Intermediaries 中介方	<p>Third Parties who act on behalf of the InnoLight Group to: a) find, introduce, obtain, or maintain business or any other commercial advantage or b) obtain government approvals or action, such as sales representatives, consultants, and agents.</p> <p>指代表中际旭创集团行事的第三方，其职责包括：a) 寻找、介绍、获取或维持业务关系，或取得其他任何商业优势；或 b) 获取政府审批或促成政府行动，例如销售代理、顾问和其他代理人。</p>
Public Official 公职人员	<p>A person who performs public duties, irrespective of the seniority of that person and includes anyone working in a legislative, administrative or juridical position, or working on behalf of government owned or state-controlled entities or agencies, political parties, party officials, prospective Public Officials such as political candidates, or for a public international organisation whose members are: (i) countries or territories; (ii) governments of countries or territories; or (iii) other public international organisations.</p>

	<p>公职人员，系指履行公共职责的任何人士，无论其职位高低，包括但不限于在立法、行政或司法岗位任职的人员，以及代表政府所有或国家控制的实体或机构、政党及其官员工作的人员；亦包括潜在的公职人员（如政治候选人），以及在成员为以下主体的国际公共组织中任职的人员：(i)国家或地区；(ii)国家或地区政府；或(iii)其他国际公共组织。</p> <p>Though they are not themselves Public Officials, interactions with family members of, and others closely associated with, Public Officials are subject to the same restrictions as interactions with Public Officials under this ABC Policy.</p> <p>尽管公职人员的家属及其他关系密切的人士本身并非公职人员，但依据本 ABC 政策，与该等人士的往来须遵守与公职人员相同的限制规定。</p>
Red Flag 风险信号	<p>A red flag is a serious concern about a Third Party's, or anyone's integrity. For instance, being listed on a sanctions list, having prior court convictions, adverse media reports, allegations of corruption or any suspicious behaviour in relation to e.g. money laundering, bribery and corruption.</p> <p>“风险信号”系指对某第三方或相关方诚信状况产生的重大疑虑。例如，被列入制裁名单，存在腐败相关的法庭定罪前科、负面媒体报道、指控，或存在与洗钱、贿赂及腐败等相关的任何可疑行为。</p>

3. Gifts, Meals & Entertainment 礼品、餐饮及其他业务招待

In many countries, gifts, meals and entertainment play an important role in business protocols and customs. However, when provided inappropriately, gifts, meals and entertainment may violate one or more anti-bribery and corruption laws.

在许多国家，礼品、餐饮及招待在商业礼仪与习俗中扮演着重要的角色。然而，若提供方式不当，礼品、餐饮和招待可能违反一项或多项反贿赂及反腐败法律。

InnoLight Staff and Associated Persons must ensure that they do not place, potentially place or give the appearance of placing the InnoLight Group in a position where a business advantage is expected to be given by the InnoLight Group in return for gifts, meals, or entertainment.

中际旭创员工和关联人士应确保，其涉及礼品、餐饮或招待的行为不会导致中际旭创集团被视作将以商业优待作为回报。

● Prohibited Categories of Gifts, Meals and Entertainment 禁止赠送的礼品、餐饮与招待项目

InnoLight Staff and Associated Persons are **prohibited from doing the following in all circumstances**:

中际旭创员工和关联人士**在任何情况下均不得从事**下列行为：

- (1) making or receiving cash or cash equivalents (such as pre-paid card or vouchers);
提供或接受现金或现金等价物（比如预付卡或代金券）；
- (2) accepting gifts, meals or entertainment where he or she knows, believes, or suspects that it is intended as a bribe;

- 接受其本人明知、相信或怀疑意图构成贿赂的礼品、餐饮或招待；
- (3) requesting a Third Party to provide gifts, meals or entertainment;
要求第三方提供礼品、餐饮或招待；
- (4) making or receiving entertainment of a sexually implicit nature or other type of gifts, meals and entertainment which could damage the reputation of the InnoLight Group;
提供或接受具有性暗示性质的招待活动，或者其他可能损害中际旭创集团声誉的礼品、餐饮或招待；
- (5) making or receiving gifts, meals or entertainment where the InnoLight Staff knows or suspects it would be against the rules of the recipient's organisation; or
在明知或有理由怀疑其违反接收方组织规定的情况下，仍然提供或接受相关礼品、款待或招待；
- (6) Making or receiving tickets or invitations to events where no employees of the donor organisation are present.
在提供方组织无员工出席相关活动的情况下，赠送或接受该活动的门票或邀请函。

● **Permissible Categories of Gifts, Meals and Entertainment**
允许赠送的礼品、餐饮与招待项目

Any gifts, meals or entertainment which InnoLight Staff and Associated Persons offer or accept are only allowed **where it meets all of the following requirements**:

中际旭创员工和关联人士所提供或接受的任何礼品、餐饮或招待，仅当在**同时满足以下全部要求时**方可进行：

- (1) it is legal under all applicable ABC Laws, including applicable local laws;
符合所有适用的 ABC 法规，包括适用的当地法律；
- (2) it is reasonable in nature, value and timing;
类型、金额及时间安排上均属合理；
- (3) it is occasional and in no circumstances is offered to or accepted by the same individual or the same entity, more frequently than 3 times a year;
属偶发性行为，且在任何情况下，向同一人员或同一实体提供或接受相关礼品、餐饮或招待，每年不得超过三次；
- (4) it is properly recorded on the relevant InnoLight Staff's or Associated Person's expenses claims form following the rules for claiming expenses;
按照费用报销规定，如实填写在相关中际旭创员工或关联人士的费用报销单中；
- (5) it is never promised, offered or accepted with an intent to induce improper conduct or to secure a business advantage for the InnoLight Group;
不得以诱导不当行为或为中际旭创集团谋取商业优势为目的，而承诺或提供、接受相关礼品、餐饮或招待；
- (6) it is transparent and recorded on the relevant group company ABC Register; and
保持透明，并如实记录于中际旭创集团相关公司的 ABC 登记流程中；且
- (7) the required approval process has already been completed where the value or the recipient meets or exceeds the thresholds specified in relevant procedures.
若所涉价值或接收方达到或超过规定的标准，则必须已事先完成相应的审批流程。

In the event that any InnoLight Staff is offered or given any of the gifts, meals or entertainment prohibited by this ABC Policy or any applicable laws, the InnoLight Staff must decline immediately on the grounds that acceptance is not in compliance with this ABC Policy and inform [Internal Control Department] immediately.

若任何中际旭创员工被提供或接受本 ABC 政策或任何适用的法律所禁止的任何礼品、餐饮、招待, 该员工必须立即以接受此类款待不符合本政策为由予以拒绝, 并立刻通知内控部门。

4. Facilitation Payments 疏通费

The InnoLight Group strictly prohibits the making of any Facilitation Payment to any Public Official. In any instance where a Facilitation Payment is requested, this should be immediately reported to Internal Control Department.

中际旭创集团严禁向任何公职人员支付疏通费。若遇到索要疏通费的情况, 应立即向内控部门报告。

5. Donations 捐赠

InnoLight Staff and Associated Persons must not, on their own initiative, make political, social or charitable donations, whether in their own names or in the name of the InnoLight Group, if such donations are aimed at obtaining or retaining business for the InnoLight Group or at gaining an illegitimate business advantage for the InnoLight Group.

中际旭创员工及关联人士不得以其自身名义或中际旭创集团的名义, 主动进行政治、社会或慈善捐赠, 若该等捐赠旨在为中际旭创集团获取或维持业务, 或为其谋取不正当的商业利益。

The InnoLight Group generally prohibits the use of InnoLight Group corporate funds or resources for political contributions. For example, a corrupt Public Official may suggest that before the InnoLight Group can be considered for awards of business it must agree to contribute to a charity of the Public Official's choosing.

中际旭创集团原则上禁止使用中际旭创集团公司资金或资源进行政治性捐赠。例如, 某腐败的公职人员可能暗示, 若中际旭创集团希望获得业务机会, 就必须同意向指定的慈善机构捐款。

Companies in the InnoLight Group may choose to make social or charitable donations provided that this is permitted under any applicable laws as well as in accordance with the principles underlying this ABC Policy.

中际旭创集团旗下的公司可能会进行社会或慈善捐赠, 前提是该等捐赠符合任何适用的法律规定, 并遵循本 ABC 政策所依据的基本原则。

Charitable gifts or donations made by the InnoLight Group must be made directly to the recognised charitable organisation and not via another party or individual.

中际旭创集团所做的慈善捐赠 (包括现金捐款及实物馈赠) 必须直接交付经认可的慈善组织, 而不得通过其他第三方或个人进行。

6. Sponsorships 赞助

Sponsorships are commercial arrangements intended to benefit the InnoLight Group's long-term brand, visibility or reputation. Sponsorships may be authorised from time to time provided that there is no real or apparent expectation of immediate business advantage in return for the sponsorship, such as securing specific contracts, influencing procurement decisions, or creating

any perception of a quid pro quo. Sponsorships must be properly recorded in the relevant accounts of the InnoLight Group.

赞助是旨在提升中际旭创集团的长期品牌形象、知名度或声誉的商业安排。若不存在以赞助换取即时商业利益（如获得特定合同、影响采购决策或造成任何“利益交换”的观感）的真实或明显预期，可酌情予以批准。所有赞助必须如实记入中际旭创集团的相关会计账目。

7. Employment and Internship Offers 聘用与实习录用

In certain cases, Public Officials and external parties dealing with the InnoLight Group may request that the InnoLight Group consider giving employment or internships to certain individuals. A contract of employment or internship is an item of value that could amount to Gratification for the purposes of ABC Laws. Where any individual is being considered or interviewed for employment or for an internship, the specified safeguards must be followed, including determine whether the candidate is related to any Public Official or external party having dealings with the InnoLight Group.

在某些情况下，与中际旭创集团往来的公职人员或外部合作方可能要求中际旭创集团考虑为特定人员提供就业或实习机会。雇佣合同或实习协议属于有价值的标的，根据 ABC 法规可能构成“利益输送”。当考虑或面试任何个人担任员工或实习生时，必须遵循相关保障措施，包括核实候选人是否与任何与中际旭创集团有业务往来的公职人员或外部方存在关联。

8. Third Parties 第三方

The InnoLight Group does not tolerate any Third Parties giving or accepting bribes in the course of their businesses, whether or not such actions occur with or without the knowledge of any InnoLight Staff.

中际旭创集团严禁任何第三方在业务往来中进行行贿受贿，无论该行为是否为中际旭创员工所知悉。

The InnoLight Group requires that the InnoLight Staff follow certain steps as required before obtaining the services of: (1) Intermediaries, which often pose a particularly heightened risk for Bribery and Corruption; and (2) other Third Parties, in connection with the InnoLight Group's business.

中际旭创集团要求员工在为集团业务聘请以下两类第三方前，按照要求遵循特定步骤：（1）中介方，此类主体通常存在较高的贿赂和腐败风险；（2）其他第三方。

9. Reporting Procedure 报告流程

InnoLight Staff who have information regarding any violation or suspected violation of this ABC Policy are strongly encouraged to make a report to [anti_fraud@innolight.com] or [+86 512 8666 9288-8999]. All communications made via this channel will be kept strictly confidential and may be made on an anonymous basis.

中际旭创员工如掌握任何违反或疑似违反本 ABC 政策的信息，应立即向以下渠道报告：

【anti_fraud@innolight.com】 或者【 +86 512 8666 9288-8999】。通过该渠道进行的所有沟通都将严格保密，并可匿名进行。

An appropriate investigation shall be conducted where necessary and thereafter, [Internal Control Department] and/or the InnoLight Group relevant management may decide whether the engagement or relationship should be terminated and whether a further report may be warranted to be made to the police or other authorities in relevant jurisdictions.

必要时将开展适当调查，随后由内控部门及/或中际旭创集团相关管理层决定是否终止相关业务往来或合作关系，并判断是否需要向相关司法辖区的警方或其他主管机关进一步报告。

In the event that a report is contemplated to implicate or involve [the head of Internal Control Department] himself or herself, the relevant InnoLight Staff member may reach out directly to the InnoLight Group's relevant management as may be appropriate. Similarly, this may be done on an anonymous basis and all such communications shall be kept strictly confidential.

若拟提交的报告可能牵涉或涉及内控部门负责人本人，相关中际旭创员工可酌情直接联系中际旭创集团相关管理层。同样，此类沟通可以匿名方式进行，所有相关通讯内容均严格保密。

If InnoLight Staff become aware that they may be involved or implicated in any matter potentially involving bribery or corruption, they may also seek guidance via the email or tel. channel mentioned above.

如果中际旭创员工知悉自身可能牵涉任何潜在涉及贿赂或腐败的事项，亦可通过上述电子邮件渠道或者电话寻求指导。

No InnoLight Staff shall suffer intimidation, harassment, discrimination, retaliation, or adverse employment consequences for reporting a violation or suspected violation of ABC Laws or this ABC Policy if he or she does so honestly and in good faith.

任何中际旭创员工若本着诚实和善意的态度举报违反或疑似违反 ABC 法规或本 ABC 政策的行为，均不得因此遭受恐吓、骚扰、歧视、报复或不利的雇佣后果。

10. Breach of ABC Policy 违反 ABC 政策

The InnoLight Group takes its obligations to prevent bribery very seriously. Any InnoLight Staff who do not comply with this ABC Policy may face disciplinary action. Non-compliance could also result in criminal penalties as a result of any regulatory violation.

中际旭创集团高度重视防范贿赂的义务。任何未遵守本 ABC 政策的中际旭创员工都可能面临纪律处分，违规行为亦可能因违反监管规定而导致刑事处罚。

Upon discovery of any violation, the Supervisor of the relevant InnoLight Staff will notify [Internal Control Department]. Subsequently, [Internal Control Department] and [Legal Department] may then decide the appropriate disciplinary action to be taken, which may include suspension or dismissal from service.

一旦发现任何违规行为，相关中际旭创员工的主管人员应通知内控部门。随后，内控部门与法务部可决定采取适当的纪律处分，包括停职或解雇。

Apart from any disciplinary process, the InnoLight Group may, if it considers that the situation warrants it, report the matter to the police and/or other regulatory authorities.

除任何内部纪律程序外，若中际旭创集团认为情况需要，亦可将相关事项报告警方和/或其他监管机构。

In relation to Associated Persons, a breach of this ABC Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

就关联人士而言，违反 ABC 政策可能导致任何相关合同、分包合同或其他协议的中止或终止。

11. Record Keeping and Internal Controls 记录保存与内部控制

All expenditure made by the InnoLight Group must be accurately reflected in the InnoLight Group's records (as applicable) and all payments made with the InnoLight Group's funds, or on behalf of the InnoLight Group, must be properly authorised in accordance with existing procedures.

中际旭创集团的所有支出，均须在集团账簿记录中如实反映（如适用）；所有使用中际旭创集团资金、或代表中际旭创集团支付的款项，必须按照现有程序获得适当授权。

All payments made to a counterparty in a transaction should be made to the corporate accounts of such counterparty (i.e., rather than accounts held by an employee of the counterparty). All payments must be properly supported by documentation, accurately described in the InnoLight Group's books and records (as applicable), and reflect the true nature of the underlying transaction.

向交易相对方支付的款项应汇入该交易相对方的公司账户（而非其员工个人账户），所有付款必须具备完整凭证支持，在中际旭创集团账册及记录（如适用）中准确描述，并真实反映交易本质。

InnoLight Staff who have supervisory responsibility have the duty to ensure that the InnoLight Staff they supervise provide accurate, and complete information in connection with this ABC Policy.

负有监督职责的中际旭创员工有义务确保其下属人员就本 ABC 政策提供准确、完整的信息。

The InnoLight Group will conduct periodic reviews and audits of its books and records to monitor compliance with this ABC Policy. Compliance with this ABC Policy may also be subject to periodic internal audit.

中际旭创集团将对其账簿和记录进行定期审查与审计，以监督对本 ABC 政策的遵守情况。对本 ABC 政策的合规情况亦可能纳入定期内部审计范围。

12. Training 培训

It is mandatory for all InnoLight Staff to attend regular training in ABC Policy and Requirements and to understand the requirements and expectations set out in this ABC Policy. Such ABC training must be held at least once a year.

所有中际旭创员工必须参加定期的 ABC 政策和要求培训，并理解本 ABC 政策中规定的要求和期望。此类 ABC 培训必须至少每年举行一次。

13. Queries 咨询

Any queries relating to this ABC Policy, should (in the first instance) be directed to [Internal Control Department].

有关本 ABC 政策的任何疑问，应首先向内控部门提出。

中际旭创股份有限公司董事会

2026 年 01 月 12 日