	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

Zhongtian Technology Heat-Resistant Conductor Factory

中天科技耐热导线工厂

内部公开文件

## 商业道德准则

Code of business ethics

文件编号：ZTTHRC-BE01-ZJB-001

编 制 Editor: 於嘉禾 2025.12

审 核 Checker: 李册 2025.12


批 准 Approver: 徐玉琴 2025.12

中天科技耐热导线工厂

Zhongtian Technology Heat-Resistant Conductor Factory


2025 年 12 月



	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

## 目录

商业道德准则 .....	4
一、 目的 .....	4
二、 范围 .....	4
三、 职责 .....	5
四、 术语与定义 .....	6
五、 沟通举报方式 .....	7
六、 商业道德准则 .....	10
（一） 总体要求 .....	10
（二） 保护与尊重员工 .....	12
（三） 保护与改善环境 .....	14
（四） 提供优质的产品与服务 .....	15
（五） 反贿赂、反腐败、反欺诈 .....	16
（六） 坚持公平竞争 .....	19
（七） 坚持合规运营 .....	20
（八） 回避利益冲突 .....	23
（九） 保守商业秘密 .....	25
（十） 保护与尊重知识产权 .....	27
（十一） 负责任信息管理 .....	29
七、 文件审查与提示 .....	31
八、 相关文件 .....	31
九、 附件 .....	31
附件一：《违反商业道德事件登记表》 .....	31
附件二：《商业道德准则承诺书》 .....	31

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

## 商业道德准则

### Code of business ethics

#### 一、目的

##### I. Purpose

本商业道德行为准则是工厂每个员工都必须共同遵守的规定，也是工厂对所有利益相关者的商业原则与承诺，如员工、客户、供应商、商业合作伙伴、股东以及周边社区等。

This Code of Business Conduct is a set of rules that all employees of the factory must adhere to. It also represents the factory's business principles and commitments to all stakeholders, such as employees, customers, suppliers, business partners, shareholders, and the surrounding community.

#### 二、范围


##### II. Scope

本准则适用于工厂范围内所有部门和层级的员工，工厂每一位员工，无论身处何时何地，处理问题时必须坚持最高的商业道德标准。

This Code applies to all employees at all levels and in all departments within the factory. Every employee of the factory, regardless of time or location, must adhere to the highest standards of business ethics when handling issues.

注 1：本准则无意取代任何相关的适用法律法规、规章条例，也不可能解决所有可能出现的此类问题。为此，除本准则外，员工在评判其任何行为是否符合商业道德要求时需遵守其他相关规定。若员工对此存在疑问，应与主管部门及时沟通；

Note 1: This Code is not intended to replace any applicable laws, regulations, rules, or regulations, nor can it address all possible issues of this nature. Therefore, in addition to this Code, employees must comply with other relevant provisions when evaluating whether their actions meet business ethics requirements. If employees have any questions regarding this, they should promptly communicate with the relevant department;

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

注 2: 本准则对员工的要求并非减轻或者规避工厂的相关责任, 如员工需要主动学习了解相关规定、与工厂为其提供相应的培训并不矛盾, 不代表工厂无需主动对员工进行培训。

Note 2: The requirements of this Code for employees do not reduce or exempt the factory from its relevant responsibilities. For example, employees actively learning and understanding relevant regulations does not conflict with the factory providing corresponding training for them, nor does it mean that the factory is not required to actively train employees.

### 三、职责

#### III. Responsibilities


(一) 工厂总经办负责制定和监督实施本工厂的商业道德准则, 并定期调查评估实施的效果; 并就接收到的任何商业道德的申诉举报信息进行调查处理记录和对接受到的疑惑询问进行解答;

(1) General Manager's Office is responsible for formulating and supervising the implementation of the factory's code of business ethics, and for regularly investigating and evaluating the effectiveness of its implementation. It is also responsible for investigating and handling any complaints or reports received regarding business ethics, keeping records of such investigations, and answering any questions or inquiries received;

(二) 人力资源部负责组织各部门按计划 在部门范围内开展商业道德培训并做好记录的归档汇总工作、负责所有员工入职与每年 1 月签署《商业道德准则承诺书》;

(2) The Human Resources Department is responsible for organizing all departments to conduct business ethics training within their respective departments according to the schedule, maintaining records, and compiling summaries. It is also responsible for ensuring all employees sign the Business Ethics Commitment Letter upon joining the company and annually in January.

(三) 各部门负责具体承接执行与落实本工厂商业道德行为准则的管理要

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

求。

(3) Each department is responsible for specifically implementing and enforcing the management requirements of the factory's business ethics code of conduct.

#### 四、术语与定义

#### IV. Terms and Definitions

(一) 商业道德准则：工厂为了规范员工行为、维护商业伦理和承担社会责任而制定的一套原则和标准，旨在确保工厂在经营过程中遵守法律法规、保持诚信、公平竞争，并充分尊重利益相关者的权益；


(1) Code of Business Ethics: A set of principles and standards established by the factory to regulate employee conduct, uphold business ethics, and fulfill social responsibilities. Its purpose is to ensure that the factory complies with laws and regulations, maintains integrity, engages in fair competition, and fully respects the rights and interests of stakeholders during its operations;

(二) 合规：指工厂的经营管理行为需符合有关法律法规、国际条约、国际组织的合规准则、监管规定、行业标准、商业惯例、道德规范和股份公司的章程及规章制度等要求；

(2) Compliance: Refers to the requirement that a factory's operational and management activities must comply with relevant laws and regulations, international treaties, compliance standards of international organizations, regulatory provisions, industry standards, commercial practices, ethical norms, and the articles of association and internal regulations of the joint-stock company;

(三) 洗钱：指合法资金有可能在知情或不知情的情况下被用于支持犯罪活动或用于恐怖活动；洗黑钱是将非法资金转化为合法资金的过程，目的旨在将犯罪获得或非法性质的资金或资产隐藏在合法商业活动的外衣之下；

(3) Money Laundering: Refers to the use of legitimate funds, whether knowingly or unknowingly, to support criminal activities or terrorist activities; Money laundering is the process of converting illicit funds into legitimate funds, with the aim of concealing funds or assets obtained through criminal activities or of illicit nature

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

under the guise of legitimate business activities;

(四) 商业秘密: 指在法律规定的范围内, 工厂相关部门将关系工厂利益的技术信息、经营信息等商业信息事项, 采取一定的保密管理手段, 并规定工厂全体员工都予以保护的商业秘密信息。

(4) Trade Secrets: Within the scope of laws and regulations, the factory's relevant departments shall adopt certain confidentiality management measures to protect commercial information matters such as technical information and operational information that are related to the factory's interests, and shall stipulate that all factory employees shall protect such trade secret information.

## 五、沟通举报方式


### V.Communication Methods

(一) 所有员工或其他相关方 (客户、供应商、当地政府主管部门等) 有权就任何关于商业道德的疑惑与问题联系总经办合规专员进行沟通获得解答, 包括但不限于:

1. 对涉及商业道德的问题感到疑惑;
2. 在某些特殊情况下, 不知如何行事才符合工厂的商业道德准则;
3. 业务合作伙伴、客户或同事要求做一些可能违反商业道德准则、甚至是违法的事情;
4. 察觉或怀疑业务合作伙伴、客户或同事有违背商业道德准则、甚至是违法的行为;
5. 其他任何与商业道德相关的问题或情况。

(1) All employees or other relevant parties (customers, suppliers, local government authorities, etc.) have the right to contact the factory's compliance officer to communicate and seek answers regarding any doubts or questions related to business ethics, including but not limited to:

- a. Feeling uncertain about issues involving business ethics;
- b. Being unsure how to act in certain special circumstances to comply with the factory's business ethics guidelines;

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

c. Business partners, customers, or colleagues requesting actions that may violate business ethics guidelines or even be illegal;

d. Observing or suspecting that business partners, customers, or colleagues are engaging in conduct that violates the factory's business ethics guidelines or even illegal activities;

e. Any other issues or situations related to business ethics.

(二) 所有员工有权利也有责任对实际或者合理怀疑的违反商业道德的行为向总经办合规专员进行检举汇报，工厂也积极鼓励其他相关方进行汇报检举。对于接受到的此类报告，工厂承诺：

1. 对举报信息与举报人予以保密，以保护举报人或其他关联人员的身份信息，并且允许匿名举报；

2. 保护员工在出于善意或基于合理相信提出或举报意图、可疑和实际的违反本商业道德准则的行为后免遭报复并禁止这种报复行为；

3. 鼓励员工积极进行商业道德问题的沟通，并且通过培训确保所有人知晓沟通举报的方式与渠道；


4. 对接受到的举报信息及时组织相关人员进行调查与处理、并做好记录；

5. 若举报者也参与了违规活动，那么举报者本人也将受到相应的处分，但对主动检举或坦白者的处分视情节将从宽处理。

(2) All employees have the right and responsibility to report actual or suspected violations of business ethics to the General Manager's Office compliance officer. The factory also actively encourages other relevant parties to report such violations. For such reports received, the factory commits to:

a. To keep the reported information and the identity of the reporter confidential to protect the identity of the reporter or any related parties, and to allow anonymous reporting;

b. To protect employees from retaliation and prohibit such retaliatory actions after they report suspected or actual violations of this Code of Business Ethics in good faith or based on reasonable belief;

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

c. To encourage employees to actively communicate about business ethics issues and ensure that all employees are aware of the methods and channels for reporting through training;

d. Promptly organize relevant personnel to investigate and handle reported information, and maintain records;

e. If the reporter is also involved in the violation, the reporter will also be subject to corresponding disciplinary action; however, disciplinary action against those who voluntarily report or confess will be mitigated depending on the circumstances.

(三) 沟通与联系方式:

(3) Communication and Contact Information:

1. 内部相关的沟通、申诉与举报:

耐热导线厂总经办合规专员

邮箱:wujiahe@ztt.cn 电话:18862796052

a. Internal communication, complaints, and reports regarding:

Compliance Specialist, General Manager's Office, Heat-Resistant Wire Factory

Email:wujiahe@ztt.cn Phone:18862796052

2. 外部相关的沟通、申诉与举报:

中天科技集团财务管理中心审计绩效部

邮箱:zttma@ztt.cn 电话:13962714128

中天科技集团采购管理中心采购内控部

邮箱:zttpsaudit@ztt.cn 电话:18751353183/13485175356


b. External communication, complaints, and reports regarding :

Audit and Performance Department, Financial Management Center, Zhongtian Technology Group

Email:zttma@ztt.cn Phone:13962714128

Zhongtian Technology Group Procurement Management Center, Procurement Internal Control Department

Email:zttpsaudit@ztt.cn Phone:18751353183 / 13485175356

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

3. 商业道德申诉举报的具体接受与处理参见《内、外部申诉、举报沟通程序》，当确认不当行为存在时，应当提出并采取适当的补救措施，包括但不限于应用惩戒措施、披露给有关当局或当事人、培训及其他纠正措施。

c. For specific procedures regarding the receipt and handling of complaints and reports related to business ethics, please refer to the Internal and External Complaint and Reporting Communication Procedures. When misconduct is confirmed, appropriate remedial measures shall be proposed and implemented, including but not limited to disciplinary actions, disclosure to relevant authorities or the parties involved, training, and other corrective measures.

4. 若需采取惩处措施，具体级别根据相关法律和内部惩处制度决定，包括口头教育、警告批评、记过、记大过直至解除劳动合同。

d. If disciplinary action is warranted, the specific level of discipline will be determined in accordance with relevant laws and internal disciplinary regulations, ranging from verbal reprimands, warnings, and written reprimands to serious written reprimands, up to and including termination of the employment contract.

## 六、商业道德准则


### VI. Business Ethics Guidelines

#### (一) 总体要求

##### (1) General Requirements

1. 所有员工在工作中都应始终将工厂利益放在首位，认同公司文化、认真履行自身职责，努力维护工厂的社会形象及良好声誉，禁止损害工厂的形象、声誉或为小集体、个人利益而损害工厂利益，破坏工厂发展；经理与主管等中高层领导尤其需要以身作则、支持并指导下属员工按照本准则要求行事，并做好监督工作；

a. All employees should always prioritize the interests of the factory in their work, align with the company culture, fulfill their duties diligently, and strive to maintain the factory's social image and good reputation. It is strictly prohibited to damage the factory's image or reputation, or to harm the factory's interests for the

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

sake of small groups or personal gains, thereby undermining the factory's development; Managers and supervisors, as senior-level leaders, must lead by example, support and guide subordinate employees to act in accordance with these guidelines, and ensure proper supervision;

2. 所有员工应主动学习并充分知晓任何违反商业道德要求的行为都可能对工厂的良好形象与声誉造成伤害、甚至可能因违反现行法律、法规、规章、条例的行为而需要承担民事或刑事责任，应自觉树立并遵循最高的道德标准，维护公序良俗与公共责任，不得实施任何可能导致工厂违反相应商业道德要求的不当行为；


b. Actively learn and fully understand that any violation of commercial ethics requirements may harm the factory's good image and reputation. Consciously uphold and adhere to the highest moral standards, maintain public order and social responsibility, and refrain from engaging in any improper conduct that may cause the factory to violate relevant commercial ethics requirements;

3. 所有员工应充分了解并遵守内部商业道德管理相关的管理程序与制度，同时遵从工厂各相关的管理体系的具体管理要求，共同推动工厂商业道德管理水平取得持续进步；

c. All employees should fully understand and comply with the management procedures and policies related to internal business ethics, while adhering to the specific requirements of the factory 's relevant management systems, and work together to promote continuous improvement in the factory 's business ethics management;

4. 所有员工应自觉维护工厂内部的良好氛围与风气，每位员工在了解到不符合本商业道德行为准则、并且与工厂业务活动有关的事件时，都有责任进行揭露或举报；有任何疑惑均可直接与相关人员沟通。

e. Actively maintain a positive internal atmosphere and culture within the factory. Every employee has a responsibility to report or disclose any incidents that do not comply with this Code of Business Ethics and are related to the factory's business

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

activities. Any questions or concerns may be directly communicated with the relevant personnel.

## (二) 保护与尊重员工

### (2) Protection and Respect for Employees

#### 定性承诺:


#### Qualitative Commitment:

1. 工厂致力于确保所有员工的安全; 员工与客户是工厂最重要的资源, 工厂保证所有员工均享受在安全的环境中工作的权利, 工厂致力于预防任何工伤事故的发生; 工厂承诺遵守安全相关法律法规与国际标准或公约, 不断完善内部的安全管理制度, 帮助员工理解安全标识, 了解自身岗位存在的安全风险与应对措施、按照规定流程进行工作等等;

a. The factory is committed to ensuring the safety of all employees; employees and customers are the factory's most valuable assets. The factory guarantees that all employees have the right to work in a safe environment and is dedicated to preventing any workplace accidents. The factory pledges to comply with safety-related laws, regulations, international standards, and conventions; to continuously improve its internal safety management systems; to help employees understand safety signage; to ensure they are aware of the safety risks associated with their roles and the corresponding preventive measures; and to ensure they perform their duties in accordance with established procedures;

2. 工厂致力于确保所有员工的职业健康; 工厂坚持生产力的提高和业务的持续发展不应该以牺牲员工的幸福安康为代价, 保证尽力减少工作场所的职业危害并为员工提供充足、达标的安全防护用品且对所有员工进行合理培训; 工厂承诺遵守职业健康相关法律法规与国际标准或公约, 并支持内部职业健康管理体系的有效运作;

b. The factory is committed to ensuring the occupational health of all employees; it maintains that improvements in productivity and the sustainable development of the business should not come at the expense of employees' well-being, and guarantees


	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

that it will make every effort to minimize occupational hazards in the workplace, provide employees with adequate and compliant personal protective equipment, and conduct appropriate training for all employees; the factory pledges to comply with occupational health laws, regulations, and international standards or conventions, and supports the effective operation of its internal occupational health management system;

3. 工厂致力于遵守与促进人权发展; 工厂禁止任何歧视、骚扰、虐待、伤害员工的行为, 坚决反对人口贩卖、利用童工、压榨未成年工、强迫劳动等等, 承诺保证员工的信仰、活动、思想、通讯等的自由与其在薪酬福利、劳动强度、工时休息等方面的合理权益, 支持员工的结社活动与集体谈判权的行使; 工厂承诺全面遵守人权相关法律法规与国际标准或公约(尤其是 SA8000、WCA 标准、国际劳工组织的公约、联合国人权宣言等), 并且持续完善内部制定的程序制度等, 并支持内部社会责任管理体系的有效运行;

c. The factory is committed to upholding and promoting human rights; it prohibits any acts of discrimination, harassment, abuse, or harm against employees, and firmly opposes human trafficking, the use of child labor, the exploitation of minors, forced labor, and similar practices. The factory pledges to guarantee employees' freedom of religion, association, thought, and communication, as well as their legitimate rights regarding compensation, benefits, work intensity, working hours, and rest periods. It supports employees' right to form associations and engage in collective bargaining; The factory commits to fully complying with human rights-related laws, regulations, and international standards or conventions (particularly SA8000, WCA standards, International Labour Organization conventions, and the United Nations Universal Declaration of Human Rights), and to continuously improving its internal procedures and systems, while supporting the effective operation of its internal social responsibility management system;

4. 所有员工发现有任何安全隐患或者安全管理缺陷以及与人权要求违背的行为或活动, 均可向相关人员直接汇报。

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

d. All employees who discover any safety hazards or safety management deficiencies, as well as any behavior or activities that violate human rights requirements, may report directly to the relevant personnel.

**定量目标:**

**Quantitative targets:**

1. 工伤事故次数为 0;
  - a. Zero work-related accidents;
2. 职业病发生次数为 0;
  - b. Zero cases of occupational disease;
3. 歧视、骚扰、虐待、人口贩卖、利用童工、压榨未成年工、强迫劳动、侵犯结社自由与集体谈判权、加班超过限额、未及时足额支付工资等侵犯劳工人权的事件发生次数为 0。

c. There were zero incidents of violations of workers' human rights, including discrimination, harassment, abuse, human trafficking, the use of child labor, the exploitation of underage workers, forced labor, violations of the freedom of association and the right to collective bargaining, overtime exceeding legal limits, and failure to pay wages in full and on time.

**(三) 保护与改善环境**


**(3) Environmental Protection and Improvement**

**定性承诺:**

**Qualitative Commitment:**

1. 工厂致力于减少与降低生产与业务活动对周边环境、生物多样性、生态栖息地等的消极影响; 工厂确保所有废弃物(一般废料与危险废料)、污水等的处置合规并积极接受相关政府监督部门的审查; 工厂承诺遵守生态环境相关的法律法规与有关国际标准或公约并支持内部环境管理体系的有效运行;

a. The factory is committed to minimizing the negative impacts of its production and business activities on the surrounding environment, biodiversity, and ecological habitats; the factory ensures that all waste (including general and hazardous waste)

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

and wastewater are disposed of in compliance with regulations and actively cooperates with inspections by relevant government regulatory authorities; the factory pledges to comply with environmental laws, regulations, and relevant international standards or conventions, and supports the effective operation of its internal environmental management system;

2. 工厂致力于为绿色低碳清洁做出贡献，通过开展碳足迹记录、使用清洁能源、提高绿电、绿色原料、绿色包装等的使用比例；工厂承诺遵守相关的法律法规与有关国际标准或公约并支持内部能源管理体系与绿色低碳的运行；

b. The factory is committed to contributing to a green, low-carbon, and clean environment by tracking its carbon footprint, utilizing clean energy, and increasing the proportion of green electricity, eco-friendly raw materials, and sustainable packaging; the factory pledges to comply with relevant laws, regulations, and applicable international standards or conventions, and to support the implementation of its internal energy management system and green, low-carbon operations;

3. 所有员工对任何对环境有负面影响的活动都应及时向工厂相关人员进行汇报检举。

c. All employees should promptly report any activities that have a negative impact on the environment to the relevant personnel at the factory.

**定量目标:**

**Quantitative targets:**

1. 危险废物合规处置及时率 100%;

a.Zero work-related accidents;

2. 环境污染事故发生次数为 0。


b.Zero cases of occupational disease;

**(四) 提供优质的产品与服务**

**(4) Providing high-quality products and services**

**定性承诺:**

**Qualitative Commitment:**

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

1. 工厂坚持以品质立尊严，工厂通过创新服务和优质产品为客户提供最高价值，工厂承诺始终以高标准要求产品质量与服务标准；

a. The factory upholds the principle of “quality builds dignity.” Through innovative services and high-quality products, the factory strives to provide customers with the highest value. The factory commits to maintaining the highest standards for product quality and service standards at all times;

2. 本工厂承诺遵守质量相关法律法规与国际标准或公约，持续完善工厂质量管理体系的各项程序与制度，保证记录的客观、公正、及时；

b. This factory is committed to complying with quality-related laws, regulations, and international standards or conventions, continuously improving the procedures and systems of its quality management system, and ensuring that records are objective, impartial, and timely;

3. 所有员工对任何质量异常或质量管理缺陷等都应及时联系工厂相关人员进行汇报检举。

c. All employees should promptly report any quality issues or management deficiencies to the relevant factory personnel.

#### 定量目标:

#### Quantitative targets:

1. 产品一次不合格率 $\leq 0.7\%$ ;

a. First-pass yield rate  $\leq 0.7\%$ ;

2. 产品质量相关客诉有效解决率 100%。

b. The resolution rate for customer complaints related to product quality is 100%。


#### (五) 反贿赂、反腐败、反欺诈

#### (5) Anti-bribery, Anti-corruption, Anti-fraud

#### 定性承诺:

#### Qualitative Commitment:

1. 廉洁诚信是我们与客户及其他利益相关方最基本的合作要求，对于工厂的健康发展至关重要，工厂的壮大应当以质量与其他绩效表现为基础而不能依靠贿

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

赂贪腐等不道德行为，工厂严格禁止一切形式与一切目的的贪污、腐败、贿赂行为；

a. Integrity and honesty are the most fundamental requirements for our cooperation with clients and other stakeholders; they are crucial to the healthy development of the factory. The factory's growth must be based on quality and other performance metrics, and must not rely on unethical practices such as bribery and corruption. The factory strictly prohibits all forms and all instances of embezzlement, corruption, and bribery;


2. 工厂致力于维护诚信透明、公平公开的商业氛围，严格禁止通为获取不正当利益，故意采取欺骗、虚构、隐瞒、误导等不诚实手段，致使他人产生错误认知并作出不利决策，从而损害其财产、权利或合法权益的欺诈行为。

b. The factory is committed to maintaining a business environment characterized by integrity, transparency, fairness, and openness. It strictly prohibits fraudulent conduct in which individuals intentionally use dishonest means—such as deception, fabrication, concealment, or misrepresentation—to obtain improper benefits, thereby causing others to form erroneous perceptions and make unfavorable decisions that result in harm to their property, rights, or legitimate interests.

3. 本工厂承诺坚决遵守所有现行的反贿赂、反腐败、反欺诈相关的法律法规以及相关的国际标准和公约并支持确保工厂内部合规管理体系与反贿赂管理体系的有效运行；

c. Our factory is committed to strictly complying with all applicable laws, regulations, and international standards and conventions related to anti-bribery, anti-corruption, and anti-fraud, and supports the effective operation of our internal compliance management system and anti-bribery management system;

4. 所有员工都应拒绝一切目的的贪污、腐败、贿赂、欺诈行为，即便工厂是这些不良行为的受益者，如对客户进行贿赂以换取订单或虚报价格、对供应商进行贿赂以换取优先发货或更低价格、或者对公职人员进行贿赂以规避审查或获取政策支持等；

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

d. All employees shall refuse to engage in any form of embezzlement, corruption, bribery or fraud, even if the factory benefits from such misconduct, such as bribing customers in exchange for orders or inflating prices, bribing suppliers in exchange for priority shipping or lower prices, or bribing public officials to circumvent scrutiny or obtain policy support.

5. 所有员工都应拒绝一切形式的贪污、腐败、贿赂行为，不限于常见的赠送、承诺、支付、接受或收受金钱或任何其它优惠，还包括较为隐秘的通过礼品的赠送与接收、招待的提供与接受、捐赠的进行与接收等，所有员工均应严格遵循内部规范流程与标准处理礼品、招待、捐赠事宜，同时按照相应财务管控制度处理其他的各类涉财务工作事宜，如采购申请、报销申请、私车公用申请等；


e. All employees must refuse all forms of embezzlement, corruption, bribery or fraud, including but not limited to the common practices of giving, promising, paying, accepting, or receiving money or any other benefits. This also includes more covert practices such as the giving and receiving of gifts, the provision and acceptance of hospitality, and the making and receiving of donations. All employees must strictly adhere to internal procedures and standards when handling matters related to gifts, hospitality, and donations. Additionally, they must comply with relevant financial control regulations when handling other financial-related matters, such as procurement requests, reimbursement requests, and applications for the use of private vehicles for official purposes.

6. 所有员工对任何贪污、腐败、贿赂、欺诈事件在其发生或有合理相信认为其将会发生或存在发生的现实隐患时都应及时向工厂相关人员进行汇报检举。

f. All employees should promptly report any incidents of embezzlement, corruption, bribery or fraud to the relevant personnel at the factory when such incidents occur, or when there is reasonable cause to believe that they will occur or pose a real risk of occurring.

**定量目标:**

**Quantitative targets:**

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

1. 所有运营场所的反贿赂、反腐败、反欺诈的内部审计覆盖率达到 100%;
  - a. 100% coverage of internal audits for anti-bribery, anti-corruption, and anti-fraud measures across all operational sites;
2. 100%的员工接受过反贿赂、反腐败以及反欺诈的道德培训;
  - b. 100% of employees have received ethics training on anti-bribery, anti-corruption, and anti-fraud;
3. 贿赂、腐败、欺诈的发生次数为 0;
  - c. Zero incidents of bribery, corruption, or fraud;
4. 所有运营场所反贿赂管理体系认证（ISO 37001）覆盖率 100%;
  - d. 100% coverage of anti-bribery management system certification (ISO 37001) across all operational sites.


#### （六）坚持公平竞争

#### **(6) Adhering to fair competition**

##### 定性承诺:

##### **Qualitative Commitment:**

1. 工厂致力于维护公平公正的市场环境与市场竞争秩序, 保证不利用自己的市场优势地位阻碍、排挤、操纵、影响其他本行业内的竞争对手参与和本工厂的竞争活动;
  - a. The factory is committed to maintaining a fair and impartial market environment and competitive order, ensuring that it does not use its market dominance to hinder, exclude, manipulate, or influence other competitors in the industry from participating in competitive activities with the factory;
2. 工厂承诺坚决遵守所有现行的反不正当竞争与反垄断的法律法规及有关国际标准和公约;
  - b. The factory pledges to strictly comply with all applicable laws, regulations, and international standards and conventions regarding unfair competition and antitrust;
3. 所有员工都应当树立起正确的竞争观念与市场观念, 认同工厂文化与成就

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

的同时，拒绝滥用工厂在行业内的优势地位实现垄断行为、或者与同行合谋划分市场、操纵竞标、控制价格、限制产量等；

c. All employees should cultivate a correct understanding of competition and the market, align with the factory's culture and achievements, while refusing to abuse the factory's dominant position in the industry to engage in monopolistic behavior, collude with peers to divide markets, manipulate bids, control prices, or restrict production;

4. 所有员工都应当尊重竞争对手的商业秘密、商标品牌等，拒绝通过客户、供应商等窃取同行的商业秘密，或者是假冒竞争对手商标品牌等不当行为形成竞争优势；

d. All employees must respect competitors' trade secrets, trademarks, and brands, and refrain from improperly obtaining competitors' trade secrets through clients, suppliers, or other means, or from counterfeiting competitors' trademarks and brands to gain a competitive advantage;

5. 所有员工在发现工厂有违背公平竞争的情形时都应立即报告给工厂相关人员。

e. All employees must immediately report any instances of unfair competition involving the factory to the relevant factory personnel.

#### 定量目标:

#### Quantitative targets:

1. 100%的员工接受过反垄断与反不正当竞争的培训；

a. 100% of employees have received ethics training on anti-bribery, anti-corruption, and anti-fraud;


2. 垄断与事件的发生次数为 0；

b. Zero incidents of bribery, corruption, or fraud;

3. 不正当竞争事件发生次数为 0。

c. Zero incidents of unfair competition.

#### (七) 坚持合规运营

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

## (7) Adhering to compliant operations

### 定性承诺:

#### Qualitative Commitment:

1. 工厂承诺不进行、纵容或方便任何洗钱活动、尤其是洗黑钱活动; 本工厂坚决遵守所有现行的反洗钱的法律法规及有关国际标准和公约, 不施行任何导致工厂陷入洗钱关联的不道德行为;

a. The factory pledges not to engage in, condone, or facilitate any money laundering activities, particularly those involving proceeds of crime; the factory strictly complies with all applicable anti-money laundering laws, regulations, and relevant international standards and conventions, and will not engage in any unethical conduct that could implicate the factory in money laundering;


2. 工厂承诺不进行、纵容或方便任何逃税活动; 本工厂坚决遵守所有现行的税务法律法规及有关国际标准和公约, 不施行任何导致工厂陷入避税关联的不道德行为;

b. The factory pledges not to engage in, condone, or facilitate any tax evasion activities; the factory strictly complies with all applicable tax laws and regulations, as well as relevant international standards and conventions, and does not engage in any unethical conduct that could implicate the factory in tax avoidance schemes;

3. 工厂承诺坚持贸易合规, 遵守产品出口、设备进口等海外业务往来涉及到的各个国家的贸易合规与进出口管制的要求, 工厂应主动识别了解自身业务所涉及的有关国家的相应法律与政策, 推动实现贸易全面合规化;

c. The factory commits to upholding trade compliance and adhering to the trade compliance and import/export control requirements of all countries involved in its overseas business operations, including product exports and equipment imports. The factory shall proactively identify and understand the relevant laws and policies of the countries involved in its business operations to promote comprehensive trade compliance;

4. 工厂在海外业务中坚持中立性, 在部分政治争端较为严重、宗教信仰与民

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

族构成较为混乱的国家，工厂严格恪守政治、宗教等方面的中立立场，坚决不卷入当地争端；工厂应主动识别了解自身业务所涉及国家的有关情况，不正当表态或活动使工厂被误认为有某种鲜明立场而违背商业道德、必须声明他们在公众或政治活动中不代表公司，不得使用公司的任何资源支持政治候选人或政党，并且要避免参加任何公共部门或其他政府机构进行有关工厂的任何决策；

d. The factory maintains neutrality in its overseas operations. In countries where political disputes are particularly severe and religious beliefs and ethnic compositions are complex, the factory strictly adheres to a neutral stance on political and religious matters and resolutely refrains from becoming involved in local disputes; The factory should proactively identify and understand the relevant circumstances of the countries in which it operates. Improper statements or activities that could lead to the factory being mistakenly perceived as holding a particular stance—thereby violating business ethics—must be avoided. It must be made clear that the factory does not represent the company in public or political activities, and it must not use any company resources to support political candidates or parties. Furthermore, the factory must avoid participating in any decision-making processes regarding the factory conducted by public sector entities or other government agencies;

5. 所有员工发现工厂在合规运营方面存在缺陷或过错时，应及时报告给相关人员，以便及时纠正不符合项、避免对工厂海外业务与商业道德造成不利影响。

e. All employees who discover deficiencies or errors in the factory's compliance operations must promptly report them to the relevant personnel to ensure timely correction of non-conformity and avoid adverse effects on the factory's overseas operations and business ethics.


**定量目标：**

**Quantitative targets:**

1. 洗钱事件发生数为 0；

a. Zero incidents of money laundering;

2. 逃税漏税事件发生数为 0；

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

- b. Zero incidents of tax evasion or tax avoidance;
- 3. 海外贸易有关法律法规与政策合规率 100%;
- c. 100% compliance with laws, regulations, and policies related to foreign trade;
- 4. 所有运营场所的相关财务审计覆盖率 100%。
- d. 100% coverage of financial audits for all operating locations.

(八) 回避利益冲突

**(8) Avoidance of conflicts of interest**

**定性承诺:**

**Qualitative Commitment:**

1. 利益冲突可能扭曲员工的正常商业判断, 导致员工为个人利益而弃工厂利益于次位, 从而影响正常的商业秩序, 导致工厂合理利益受损, 工厂致力于充分识别并规避利益冲突情形;

a. Conflicts of interest may distort employees' sound business judgment, causing them to prioritize their personal interests over those of the company, thereby disrupting normal business operations and harming the company's legitimate interests. The company is committed to fully identifying and avoiding situations involving conflicts of interest;


2. 员工应当回避任何可能涉及员工自身或亲属, 并与工厂及其相关方的利益发生冲突的行为, 包括但不限于:

b. Employees shall avoid any actions that may involve themselves or their relatives and conflict with the interests of the factory and its related parties, including but not limited to:

(1) 未经所在单位负责人书面批准, 不得在有可能存在利益冲突的业务关联单位安排亲属、接受劳务或技术服务;

① Without written approval from the head of their department, employees shall not arrange for relatives to work at business-related entities where conflicts of interest may exist, nor shall they accept labor or technical services from such entities;

(2) 禁止利用工作时间和其它资源从事所兼任的工作, 禁止兼职于工厂的

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

业务关联单位或者商业竞争对手，所兼任的工作不得构成对本单位的商业竞争，禁止因兼职影响本职工作或有损公司形象；

② Prohibiting the use of work time and other resources for part-time work; prohibiting part-time employment at business-related entities or commercial competitors of the factory; part-time work must not constitute commercial competition with the employer; prohibiting part-time work from affecting primary duties or damaging the company's image;

(3) 禁止投资于参与经营管理的公司；禁止投资于工厂的任何客户或商业竞争对手；禁止利用职务之便向投资对象提供利益；

③ Prohibiting investment in companies involved in management and operations; prohibiting investment in any clients or commercial competitors of the factory; prohibiting the use of one's position to provide benefits to investment targets;

(4) 禁止通过亲属或其他委托人发生上述行为。


④ It is prohibited to engage in the aforementioned behaviors through relatives or other agents.

3. 员工的商业决策及行为应当基于股份公司的最佳利益，不得因为与未来潜在或现在的供应商、分包商、代表、聘用员工、客户、竞争对手或监管者的关系，而影响独立判断和合理决策；

c. Employees' business decisions and conduct should be based on the best interests of the corporation and should not be influenced by relationships with potential or current suppliers, subcontractors, representatives, employees, customers, competitors, or regulators in a way that affects independent judgment and reasonable decision-making.

4. 为了避免利益冲突，只有在一切条件符合股份公司合规政策、程序和要求时，工厂才可以雇佣前任或现任政府雇员；

d. To avoid conflicts of interest, the factory may only hire former or current government employees if all conditions comply with the joint-stock company's compliance policies, procedures, and requirements;

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

5. 发现在有利益冲突切实存在或存在的隐患时，及时向工厂相关人员报告。

e. If a conflict of interest is identified or there is a potential risk of such a conflict, it must be promptly reported to the relevant personnel at the factory.

**定量目标:**

**Quantitative targets:**

1. 所有运营场所的利益冲突内部审计调查率 100%;

a. 100% internal audit investigation rate for conflicts of interest across all operational sites;

2. 利益冲突导致的重大不合规事件发生数为 0。

b. Zero incidents of major non-compliance resulting from conflicts of interest.

**(九) 保守商业秘密**

**(9) Keeping business secrets confidential**

**定性承诺:**


**Qualitative Commitment:**

1. 商业秘密是工厂重要的无形资产，工厂严格遵守关于商业秘密的法律法规与相关国际标准和公约，持续完善内部关于商业秘密的保护规定，推动工厂内部商业秘密管理体系的运行；

a. Trade secrets are an important intangible asset for the factory. The factory strictly complies with laws, regulations, and relevant international standards and conventions regarding trade secrets, continuously refines its internal regulations on trade secret protection, and promotes the operation of its internal trade secret management system;

2. 所有员工不得在未经内部沟通或向上级领导请示前，擅自对外发布、在公开场合讨论、向未经授权的人或机构披露或无正当授权情况下使用工厂或相关第三方的经营保密信息和技术保密信息（经营保密信息和技术保密信息合称“商业秘密信息”）；

b. All employees shall not, without prior internal communication or approval from their superiors, release to the public, discuss in public, disclose to unauthorized

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

persons or institutions, or use the factory's or related third parties' confidential business information and confidential technical information (confidential business information and confidential technical information are collectively referred to as “trade secret information”) without proper authorization;


3. 经营信息包括但不限于：重大决策中的秘密事项；尚未付诸实施的经营战略、经营方向、经营规划、经营项目及决策；内部掌握的合同、协议、意向书及可行性报告、主要会议记录；供销情报及供应商、客户档案；财务预决算报告及各类财务报表、统计报表（须公开披露的除外）；尚未进入市场或尚未公开的各类信息；职员人事档案、工资、劳务性收入及资料；内部管理制度；

c. Business information includes but is not limited to: confidential matters in major decisions; business strategies, directions, plans, projects, and decisions that have not yet been implemented; contracts, agreements, memorandums of understanding, feasibility reports, and records of major meetings held internally; supply and marketing intelligence and supplier and customer files; financial budget and final accounts reports, various financial statements, and statistical reports (excluding those required to be publicly disclosed); information that has not yet entered the market or been publicly disclosed; employee personnel files, wages, labor-related income, and related documents; internal management systems;

4. 技术信息包括但不限于：各类技术资料；员工在工作期间完成的技术成果及著出的论文、著作、书籍或在工作期间总结、觉察到的信息及其他经工厂确定应当保密的事项；

d. Technical information includes, but is not limited to: various technical materials; technical achievements completed by employees during their employment, as well as papers, works, books, or information summarized or discovered during their employment, and other matters determined by the factory to be confidential;

5. 负责管理、使用、传递经营保密信息和技术保密信息的员工不得在工厂内部或向外部第三方不当披露和滥用相关数据；在对外交往与合作中需要提供工厂秘密事项的，应当事先经总经理批准；员工发现经营保密信息或技术保密信息已

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

经泄露或者可能泄露时，应当立即采取补救措施并及时报告；

e. Employees responsible for managing, using, and transmitting confidential business information and confidential technical information shall not improperly disclose or misuse such data within the factory or to external third parties. When it is necessary to disclose confidential factory matters in external communications and cooperation, prior approval from the general manager shall be obtained. When employees discover that confidential business information or confidential technical information has been leaked or may be leaked, they shall immediately take remedial measures and report the matter in a timely manner.

6. 所有员工绝对禁止利用工厂的商业秘密信息为自己或他人谋取利益；尤其禁止通过内幕交易损害金融交易市场秩序。

f. All employees are strictly prohibited from using the factory's confidential commercial information for personal gain or for the benefit of others; in particular, insider trading that damages the order of the financial trading market is strictly prohibited.

7. 同样应自觉尊重其他往来方的商业秘密，禁止通过各类手段违规获取其商业秘密。

g. Similarly, you should consciously respect the trade secrets of other business partners and refrain from obtaining their trade secrets through any unlawful means.

**定量目标：**

**Quantitative targets:**

1. 商业秘密泄漏事故发生次数为 0；

a. Zero incidents of trade secret leaks;


2. 内幕交易的发生次数为 0；

b. Zero incidents of insider trading;

3. 侵犯其他相关方商业秘密的次数为 0。

c. Zero incidents of infringement of other stakeholders' trade secrets.

**(十) 保护与尊重知识产权**

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

## (10) Protection and respect for intellectual property rights

### 定性承诺:

#### Qualitative Commitment:

1. 知识产权是工厂技术、工艺、设备优势的核心体现，对工厂在市场的优势地位与强大竞争力有着重要的支撑作用；工厂高度重视内部知识产权成果保护，严格遵守知识产权相关法律法规与国际标准或公约，并对他人的知识产权给与尊重与保护；


a. Intellectual property is the core embodiment of a factory ' s technological, process, and equipment advantages, and plays a vital role in underpinning its dominant market position and strong competitiveness; the factory places great emphasis on protecting its internal intellectual property achievements, strictly complies with relevant intellectual property laws, regulations, and international standards or conventions, and respects and protects the intellectual property rights of others;

2. 所有员工都应妥善保管承载知识产权的载体（如技术图纸、数据库、软件密钥、产品原型），不随意复制、传播或是将此类敏感载体带出工作场所；

b. All employees should properly store media containing intellectual property (such as technical drawings, databases, software keys, and product prototypes) and refrain from copying, distributing, or removing such sensitive media from the workplace;

3. 所有员工都需牢固树立知识产权意识，除了保护好工厂的知识产权外，也需尊重他人的知识产权，拒绝使用盗版软件、材料等，尤其是字体、PPT 模版与图片、设计软件等常见的易被忽视的要素，做到不侵犯和违反任何第三方的知识产权；

c. All employees must firmly establish intellectual property rights awareness. In addition to protecting the factory's intellectual property rights, they must also respect the intellectual property rights of others and refuse to use pirated software, materials, etc., especially fonts, PPT templates, images, design software, and other commonly

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

overlooked elements, so as not to infringe upon or violate the intellectual property rights of any third party;

4. 对于他人授权使用的知识产权, 未经其所有人允许, 不得私自传播或分享, 保护知识产权使用权、尊重他人成果;

d. Intellectual property rights authorized for use by others shall not be disseminated or shared without the permission of the owner. Intellectual property rights shall be protected and the achievements of others shall be respected;

5. 所有员工发现有任何违反保守与尊重知识产权要求的行为或切实担忧时, 都应及时向工厂相关人员进行汇报。

e. All employees who discover any violations of intellectual property rights or have genuine concerns should promptly report them to the relevant personnel at the factory.

**定量目标:**

**Quantitative targets:**

1. 知识产权泄漏事故发生次数为 0;

a. Zero incidents of intellectual property leaks;

2. 侵犯其他相关方知识产权的发生次数为 0。

b. There were zero instances of infringement of intellectual property rights belonging to other relevant parties.

**(十一) 负责任信息管理**


**(11) Responsible Information Management**

**定性承诺:**

**Qualitative Commitment:**

1. 信息系统的连续稳定与隐私数据的妥当保护是工厂业务连续稳定的重要条件。工厂高度重视员工 (包括离职员工)、客户、供应商及其他相关方的个人信息与隐私保护, 严格遵循各国数据保护相关法律法规要求, 持续推动构建完善的个人信息保护管理体系, 并设立数据安全保护官统筹相关工作。

a. The continuous and stable operation of information systems and the proper

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

protection of personal data are essential to the factory ' s business continuity. The factory places a high priority on protecting the personal information and privacy of employees (including former employees), customers, suppliers, and other stakeholders. It strictly complies with the data protection laws and regulations of various countries, continuously works to establish a comprehensive personal information protection management system, and has appointed a Data Protection Officer to oversee these efforts.

2. 工厂严格遵守业务所在地信息安全相关法律规定, 通过合理有效的管理方式与技术手段确保数据及信息的安全, 对于不再需要处理的个人信息, 及时予以删除或匿名化处置, 并部署数据防泄漏机制, 防范信息泄露风险。

b. The factory strictly complies with all applicable information security laws and regulations in the jurisdictions where it operates. It ensures the security of data and information through reasonable and effective management practices and technical measures. Personal information that is no longer required for processing is promptly deleted or anonymized, and data leakage prevention mechanisms are implemented to mitigate the risk of information leaks.

3. 工厂员工必须严格遵循工厂的信息安全与隐私保护的政政策、管理制度、技术标准 and 信息系统控制要求, 承担相关安全义务和责任, 并及时报告信息安全事件。


c. Factory employees must strictly adhere to the factory's information security and privacy protection policies, management systems, technical standards, and information system control requirements, assume relevant security obligations and responsibilities, and promptly report information security incidents.

**定量目标:**

**Quantitative targets:**

1. 所有运营场址信息安全管理体系认证 (ISO 27001) 覆盖率 100%;

a. 100% certification coverage of information security management systems (ISO 27001) at all operational sites;

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

2.信息泄露事件发生次数为 0。

b. There were zero incidents of information leaks.

## 七、文件审查与提示

### VII.Document Review and Guidance

1. 本准则由中天科技耐热导线工厂负责解释和修订。工厂会根据国内外相关最新法律法规与政策规章、国际标准或公约、监管要求和行业发展趋势等，结合与工厂利益相关方的沟通反馈，每年进行此文件的复查，并适时更新本文件内容。

a. Zhongtian Technology Heat-Resistant Conductor Factory is responsible for interpreting and revising these guidelines. The factory will review this document annually and update its content as appropriate, taking into account the latest relevant domestic and international laws, regulations, and policies; international standards or conventions; regulatory requirements; and industry trends, as well as feedback from the factory’s stakeholders.

2. 本文件为中英双语版本，若中英文存在差异，请以中文版本为准。

b. This document is available in both Chinese and English. In the event of any discrepancy between the Chinese and English versions, the Chinese version shall prevail.

## 八、相关文件

### VII.Related documents

《内、外部申诉、举报沟通程序》 ZTTHRC-T02-RLZY-002

Internal and External Complaint and Reporting Communication Procedure  
ZTTHRC-T02-RLZY-002

## 九、附件

### VIII.Appendices


附件一：《违反商业道德事件登记表》

附件二：《商业道德准则承诺书》

Appendix 1: “Record of Violations of the Code of Business Ethics”

Appendix 2: “Commitment to the Code of Business Ethics”



	管理手册 Management Manual		文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics		修改码: Amendment code A/1	共 34 页 Total 33

附件二：

## 商业道德准则承诺书

编号：ZTTHRC-BE04-CB-002

说明：请仔细阅读下列规定，并在理解确认后签署名字及日期。如有疑问，请联系合规主管部门。

我，\_\_\_\_\_，特此申明并保证如下：

一、我已经仔细阅读《商业道德准则》，在此申明，我已经充分理解并自愿接受《商业道德准则》的所有规定；

二、我保证在过去十二个月期间，未出现过由我引起的商业道德不良记录或发生的不当款项；

三、我确定，在过去十二个月期间，我对同事、下属及上级未被公开的违反或逃避商业道德管理的行为不知情；

四、我保证，我了解与我后续工作职责有关的《商业道德准则》中的规定，并在后续工作中避免出现违反或逃避《商业道德准则》规定的任何行为；


五、我保证在以后工作中，如果知悉同事、下属及上级存在违反《商业道德准则》的情况，我会将有关情况通过举报渠道向工厂合规专员反映或直接汇报江苏中天科技股份有限公司首席合规官。

七、我确定，我已经完全了解了违反本准则的沟通汇报的渠道与具体的联系人及联系方式。

八、我认同，申明中的错误陈述或虚假陈述会导致不限于谴责或解雇处分等各种纪律处罚。

九、我知晓，《准则》旨在提供本工厂政策的概览，并不代表特定时间内生效的所有政策。我进一步知晓，《准则》或其中引用的任何工厂政策，都不构成与中天科技及其子公司的雇佣合同或继续雇佣的保证，且公司保留随时修改其政策和本《准则》的权利。

签名：

	管理手册 Management Manual	文件编号 Document code: ZTTHRC-BE01-ZJB-001	
	商业道德准则 Code of business ethics	修改码: Amendment code A/1	共 34 页 Total 33

日期: