

申诉、投诉与举报管理 政策

Grievance, Complaint, and Report Management Policy

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1 目的与依据 Purpose and Basis

为保障公司环境、社会及治理（ESG）管理体系的有效运行，切实维护员工及利益相关方的合法权益，建立畅通、公正、保密的申诉与举报渠道，确保所有涉及 ESG 议题的关切、投诉或举报均能得到及时受理、客观调查与有效补救，特制定本政策。

To ensure the effective operation of the Company's Environmental, Social, and Governance (ESG) management system, genuinely safeguard the legitimate rights and interests of employees and stakeholders, and establish accessible, fair, and confidential grievance and reporting channels, ensuring that all concerns, complaints, or reports related to ESG topics are promptly received, objectively investigated, and effectively remediated, this Policy is hereby formulated.

2 适用范围 Scope of Application

本政策适用于上海爱旭新能源股份有限公司及其子公司的任何利益相关方（包括

但不限于董事、高级管理层、各类型员工、服务提供商、供应商、合作伙伴、客户、社区居民以及社会公众等) 对其 ESG 议题的申诉、投诉与举报。

This Policy applies to any stakeholder (including but not limited to directors, senior management, all types of employees, service providers, suppliers, partners, customers, community residents, and the general public) of Shanghai Aiko Solar Co., Ltd. and its subsidiaries regarding their grievances, complaints, and reports on ESG topics.

子公司包括但不限于浙江爱旭太阳能科技有限公司、天津爱旭太阳能科技有限公司、广东爱旭科技有限公司、珠海富山爱旭太阳能科技有限公司、滁州爱旭太阳能科技有限公司、山东爱旭太阳能科技有限公司等，以下统称为“爱旭”或“公司”。

Subsidiaries include but are not limited to Zhejiang Aiko Solar Technology Co., Ltd., Tianjin Aiko Solar Technology Co., Ltd., Guangdong Aiko Solar Technology Co., Ltd., Zhuhai Fushan Aiko Solar Technology Co., Ltd., Chuzhou Aiko Solar Technology Co., Ltd., Shandong Aiko Solar Technology Co., Ltd., etc., collectively referred to as "AIKO".

ESG 议题包括但不限于：

ESG topics include but are not limited to:

ESG 维度	类别	具体议题
ESG	Category	Specific Topics

Dimension		
<p>E-环境 E-Environment</p>	<p>环境 Environment</p>	<p>污染物超标排放、危险废物违规处置、工作场所环境安全缺陷（通风不良、有毒有害物质暴露）、能源浪费、水资源过度消耗等不符合公司环境承诺的行为、环境数据造假或虚假环境声明等。</p> <p>Excessive pollutant discharge, illegal disposal of hazardous waste, workplace environmental safety deficiencies (poor ventilation, exposure to toxic and hazardous substances), energy waste, excessive water consumption inconsistent with the Company's environmental commitments, environmental data falsification or false environmental claims, etc.</p>
<p>S-社会 S-Social</p>	<p>劳工人权 Labor and Human Rights</p>	<p>任何形式的童工或强迫劳动、扣押身份证件、收取押金、限制人身自由、歧视（基于种族、肤色、年龄、性别、性倾向、宗教、残疾、婚姻状况、怀孕等）、职场骚</p>

		<p>扰(包括性骚扰、霸凌、恐吓、精神压迫)、 打击报复、拖欠工资。</p> <p>Any form of child labor or forced labor, withholding of identity documents, collection of deposits, restriction of personal freedom, discrimination (based on race, color, age, gender, sexual orientation, religion, disability, marital status, pregnancy, etc.), workplace harassment (including sexual harassment, bullying, intimidation, psychological oppression), retaliation, wage arrears.</p>
	<p>职业健康安全 Occupational Health and Safety</p>	<p>未提供必要个人防护用品。</p> <p>Failure to provide necessary personal protective equipment</p>
	<p>供应链责任 Supply Chain</p>	<p>供应商存在人权侵犯、环境违规行为、冲突矿产来源不明或未履行尽职调查等。</p>

	Responsibility	Suppliers' human rights violations, environmental violations, unclear sources of conflict minerals, or failure to conduct due diligence, etc.
G-公司治理 G-Governance	商业道德与信息 安全 Business Ethics and Information Security	商业道德违规（贿赂、腐败、利益冲突、洗钱）、违反公平竞争、侵犯商业秘密、个人信息泄露或数据安全事件等。 Violations of business ethics (bribery, corruption, conflicts of interest, money laundering), unfair competition, infringement of trade secrets, personal information leakage or data security incidents, etc.

3 申诉与举报渠道 Grievance and Reporting Channels

公司设立多元化、可及的申诉与举报渠道，内外部利益相关方可通过以下任一渠道，以实名或匿名方式提出申诉、投诉或举报：

The Company has established diversified and accessible grievance and reporting channels. Internal and external stakeholders may submit grievances, complaints, or reports through any of the following channels, either anonymously or by name:

渠道类型 Channel Type	具体渠道 Specific Channel	受理事项 Matters Accepted
电子邮箱 Email	esg@aikosolar.com	环境、社会及一般 ESG 议题 Environmental, social, and general ESG topics
	audit@aikosolar.com	反腐败、商业道德、利 益冲突 Anti-corruption, business ethics, conflicts of interest
	yuangongguanxi@AIKO solar.com	劳动权益、职场关系申 诉 Labor rights, workplace relationship grievances
	Aikoprocurement@aikosolar.com	供应链责任类 Supply chain

		responsibility matters
二维码投诉 QR Code Complaint and Reporting Channel		各类申诉与举报 All types of grievances and reports
实体信箱 Physical Mailbox	各基地“举报信箱”（食堂、车间） "Report Mailbox" at each base (canteen, workshop)	各类申诉与举报 All types of grievances and reports
信件书函 Correspondence	浙江省义乌市好派路 699 号研发楼 -ESG 部（收） ESG Department, R&D Building, No. 699 Haopai Road, Yiwu City, Zhejiang Province, China	各类申诉与举报 All types of grievances and reports
	浙江省义乌市好派路 699 号研发楼-审 计部（收） Audit Department, R&D Building, No. 699 Haopai Road, Yiwu City, Zhejiang Province, China	反腐败、商业道德、利 益冲突 Anti-corruption, business ethics, conflicts of

		interest
	<p>浙江省义乌市好派路 699 号研发楼-信息安全部（收）</p> <p>Information Security Department, R&D Building, No. 699 Haopai Road, Yiwu City, Zhejiang Province, China</p>	<p>信息安全/数据泄露举报</p> <p>Information security/data breach reports</p>
	<p>浙江省义乌市好派路 699 号研发楼-环境与安全部（收）</p> <p>EHS Department, R&D Building, No. 699 Haopai Road, Yiwu City, Zhejiang Province, China</p>	<p>环境与职业健康安全</p> <p>Environment and occupational health & safety</p>
	<p>浙江省义乌市好派路 699 号研发楼-采购部（收）</p> <p>Procurement Department, R&D Building, No. 699 Haopai Road, Yiwu City, Zhejiang Province, China</p>	<p>供应链责任类</p> <p>Supply chain responsibility matters</p>

4 申诉、投诉与举报受理流程 Grievance, Complaint and Report Handling Process

4.1 接收与登记 Receipt and Registration

各直接受理部门（ESG 部、审计部、人力资源部、信息安全部、采购部、环安部等）须指定专人负责申诉渠道的日常维护、信息接收及初步登记。

Each directly responsible department (ESG Department, Audit Department, Human Resources Department, Information Security Department, Procurement Department, EHS Department, etc.) shall designate a dedicated person responsible for the daily maintenance of grievance channels, information reception, and preliminary registration.

对收到的申诉与举报，须在 2 个工作日内完成登记，并录入保密台账。

Received grievances and reports shall be registered within 2 working days, and entered into a confidential ledger.

4.2 受理与分派 Acceptance and Assignment

接收到举报人提供的申诉、投诉或举报材料后，及时研究材料内容，确认调查部门，确认属于本部门的，将委派专人跟进调查；确认属于其他部门的，将在遵循保密原则下移交相关部门处理。

Upon receiving the grievance, complaint, or report materials provided by the reporter, the content shall be promptly studied, and the investigating department shall be confirmed. If it falls under the department's purview, a dedicated person will be assigned to follow

up on the investigation; if it falls under another department's purview, it will be transferred to the relevant department for handling in accordance with the principle of confidentiality.

受理部门需在五个工作日内完成初步审查，确定是否受理，并向实名申诉人反馈初步审查结果（匿名除外）。

The responsible department shall complete the preliminary review within five working days, determine whether to accept the case, and inform the named complainant of the preliminary review result (anonymous cases excluded).

4.2.1 受理条件 Conditions for Acceptance

- a. 事项属于本政策第 2 条规定的范围；
 - b. 提供可核查的初步事实依据；
 - c. 非恶意诬告、捏造事实。
- a. The matter falls within the scope defined in Article 2 of this Policy;
 - b. Verifiable preliminary factual basis is provided;
 - c. It is not a malicious false accusation or fabricated fact.

4.2.2 不予受理条件 Conditions for Non-Acceptance

不属于受理范围、无事实依据、已进入司法程序等，应向实名申诉人说明理由。

Matters not falling within the scope, lacking factual basis, or already subject to judicial proceedings shall be explained to the named

complainant with reasons provided.

4.3 调查与处理 Investigation and Handling

- a. 一般事项：15 个工作日内完成调查。
 - b. 复杂事项：经部门负责人批准可延长至 30 个工作日，并告知申诉人延期理由。
 - c. 调查方式：文件查阅、人员访谈、现场观察、数据分析，必要时委托第三方专业机构。
 - d. 处理结论：事项属实的，出具《申诉/举报处理决定书》，明确处理措施及整改要求；事项不属实的，向实名申诉人说明依据并终止调查；涉及恶意诬告的，视情节追究相关人员责任。
 - e. 涉及跨部门复杂事项：由主责部门牵头，成立联合调查组（可邀请 ESG 部、法务部等参与），确保调查全面客观。
- a. General matters: Investigation shall be completed within 15 working days.
 - b. Complex matters: With the approval of the department head, the period may be extended to 30 working days, and the complainant shall be informed of the reason for the extension.
 - c. Investigation methods: Document review, personnel interviews, on-site observation, data analysis, and when necessary, entrusting third-party professional institutions.
 - d. Investigation conclusions: If the matter is substantiated, a

"Grievance/Report Handling Decision Letter" shall be issued, specifying handling measures and rectification requirements. If the matter is unsubstantiated, the basis shall be explained to the named complainant and the investigation shall be terminated. If malicious false accusation is involved, the responsibility of the relevant personnel shall be pursued based on the circumstances.

e. Complex cross-departmental matters: Led by the primary responsible department, a joint investigation team shall be established (which may invite the ESG Department, Legal Department, etc., to participate) to ensure the investigation is comprehensive and objective.

4.4 结果与反馈 Results and Feedback

相关处理意见将在管理层审批确认后，发送至被举报人进行最终确认。且后续应对申诉处理结果进行持续跟踪，确保所采取的整改措施和答复意见得到有效执行，且无打击报复情形出现。

Relevant handling opinions shall be sent to the reported person for final confirmation after management approval. Subsequently, the implementation of the grievance handling results shall be continuously tracked to ensure that the rectification measures and response opinions adopted are effectively executed and that no retaliation occurs.

结果类型 Result Type	处理措施 Result Type
内部违纪违规 Internal Disciplinary Violations	警告、记过、降职、解除劳动合同等 Warning, demerit, demotion, termination of labor contract, etc.
违法行为 Illegal Acts	移送司法机关处理，或通过法律程序追偿 Transfer to judicial authorities for handling, or seek compensation through legal procedures.
制度缺陷 Systemic Deficiencies	依据《纠正措施控制程序》启动流程优化、培训强化、内控完善 Initiate process optimization, training enhancement, and internal control improvement in accordance with the "Corrective Action Control Procedure."

4.5 信息报送与统筹 Information Reporting and Coordination

各直接受理部门每半年（6月30日、12月31日前）向ESG部报送本半年申诉/举报处理台账。

Each directly responsible department shall submit the grievance/report handling ledger for the past six months (anonymized, including case number, type, handling result, handling

duration, etc.) to the ESG Department every six months (by June 30 and December 31) .

重大案件（涉及童工、强迫劳动、重大腐败、群体性事件等）须在 24 小时内通报 ESG 部。

Major cases (involving child labor, forced labor, major corruption, mass incidents, etc.) shall be reported to the ESG Department within 24 hours.

ESG 部负责编制年度统计分析报告，作为管理评审输入，评估机制有效性，并提出改进建议。

The ESG Department is responsible for preparing an annual statistical analysis report, serving as input for management review, evaluating the effectiveness of the mechanism, and proposing improvement recommendations.

5 举报人保护 Whistleblower Protection

5.1 鼓励举报 Encouragement of Reporting

公司鼓励员工、业务合作伙伴及其他相关方通过适当渠道，善意地提出疑问、寻求建议或举报疑似违反本政策的行为。对查证属实的重大举报，公司将视情况给予表彰或奖励。

The Company encourages employees, business partners, and other relevant parties to raise questions, seek advice, or report suspected

violations of this Policy in good faith through appropriate channels.

For substantiated major reports, the Company will consider giving recognition or rewards based on the circumstances.

5.2 保密原则 Confidentiality Principles

a. 信息分离：举报人身份信息与举报内容分别登记，举报人信息由直接受理部门授权的专人严格保密保管，非必要且非特别授权人员无权查阅。

b. 知情范围：严格控制调查过程中的信息知悉范围，仅限调查必需人员。

c. 材料管理：举报材料及调查过程文件按“机密”级管理，电子文档设置访问权限，纸质文档存放于加锁文件柜。

a. Information Segregation: The reporter's identity information and the content of the report shall be registered separately. The reporter's information shall be kept strictly confidential by a person authorized by the directly responsible department and stored securely. Personnel without necessity and specific authorization shall not have access.

b. Scope of Knowledge: The scope of information knowledge during the investigation process shall be strictly controlled, limited only to personnel necessary for the investigation.

c. Material Management: Reporting materials and investigation process documents shall be managed as "confidential." Electronic documents shall have access permissions set, and paper documents

shall be stored in locked filing cabinets.

5.3 举报人保护 Non-Retaliation Commitment

公司严禁任何组织或个人对举报人、证人、协助调查人员实施任何形式的打击报复（包括否决福利、降低绩效、解雇、降职、威胁、骚扰、歧视及威胁人身安全等）。对报复行为零容忍，一经查实，将视情节给予严厉追责，包括解除劳动合同、解除合作关系，并依法追究法律责任。

The Company strictly prohibits any organization or individual from engaging in any form of retaliation against reporters, witnesses, or personnel assisting in the investigation (including denial of benefits, performance reduction, dismissal, demotion, threats, harassment, discrimination, and threats to personal safety). The Company has zero tolerance for retaliation. Once verified, those responsible will be severely pursued based on the circumstances, including termination of labor contracts, termination of cooperation, and legal liability in accordance with the law.

6 审阅、修订机制

该政策由爱旭解释与修订，确保本政策的有效性和时效性，并根据公司实际运营情况与法律法规的变化，一般情况下修订或更新的周期为每年 1 次。本政策以中文和英文版本制备，若中英文版本不一致，以中文版本为准。

This Policy shall be interpreted and revised by AIKO. To ensure its

effectiveness and timeliness, and in response to changes in the Company's actual operations and relevant laws and regulations, this Policy will generally be revised or updated annually. This Policy is prepared in both Chinese and English versions. In case of any discrepancy between the two versions, the Chinese version shall prevail.