

**金风科技股份有限公司**  
**Goldwind Science & Technology Co., Ltd.**  
**反舞弊管理制度**  
**Anti-Fraud Management Policy**

## 1 目的 Purpose

为加强公司廉政管理，通过惩防结合的措施有效控制舞弊风险，促进廉洁自律企业文化建设，根据国家法律、法规、监管要求，结合社会公序良俗以及公司的实际情况，制定本制度。  
To strengthen the company's integrity management, effectively control fraud risks through measures that integrate punishment with prevention, promote the development of a corporate culture characterized by integrity and self-discipline, and in accordance with national laws, regulations, regulatory requirements, social public order, good customs, and the actual situation of the company, this system is formulated.

## 2 范围 Scope

本文件规定了舞弊的概念及形式、反舞弊工作组织和职责分工、反舞弊工作重点风险领域、舞弊的预防和控制、舞弊案件的举报、调查、报告及对举报人的保护和奖励，舞弊行为的补救及处分措施等方面的内容。

This document specifies provisions regarding the concept and forms of fraud, the organizational structure and division of responsibilities for anti-fraud initiatives, key risk areas for anti-fraud work, fraud prevention and control, the reporting, investigation, and handling of fraud cases, including the protection and rewarding of whistleblowers, as well as remedial and disciplinary measures for fraudulent conduct.

本文件适用于金风科技股份有限公司（含其分公司）及其直接或间接控股子公司（含其分公司）等公司主体，同时适用于各业务单元、集团职能部门等业务单元主体。

This document applies to Goldwind Science & Technology Co., Ltd.(including its branches)and its directly or indirectly wholly-owned subsidiaries(including their branches), as well as business units and group functional departments.

## 3 规范性引用文件 Normative References

下列文件对于本文件的应用是必不可少的。凡是注日期的引用文件，仅所注日期的版本适用于本文件。凡是不注日期的引用文件，其最新版本（包括所有的修改单）适用于本文件。

《集团奖惩管理制度》

《集团供应商管理办法》

The documents listed below are considered as an integral part of this document. For the dated references, only the editions specified apply to this document. For undated references, the latest edition (including any amendments) applies to this document.

《Group Reward and Punishment Policy》

《Group Supplier Management Guidelines》

## 4 术语和定义 Terms and definitions

### 4.1 舞弊 Fraud

本制度所称舞弊，指个人或组织通过欺骗、隐瞒、伪造、篡改等手段，谋取不当利益或损害公司利益的主观故意行为。符合以下5.1至5.6标题所描述的行为，均属于本制度所称舞弊行为。

The term 'fraud' as used in these regulations refers to any intentional act committed by an individual or organization, through means such as deception, concealment, falsification, or alteration, aimed at obtaining improper benefits or harming the interests of the company. All conducts described under the section titles 5.1 to 5.6 herein constitute fraud as defined by these regulations.

### 4.2 特定关系人员 Related Parties

本制度所称“特定关系人员”包括但不限于：

- (1) 配偶、子女、父母、兄弟姐妹等亲属关系人员；
- (2) 战友、同乡、校友、好友等关系人员；
- (3) 其他与员工存在异常经济往来或利益输送的人员；。

The term " Related Parties " as used in these regulations includes, but is not limited to:

- (1) Individuals related by kinship, such as spouses, children, parents, siblings, etc.;
- (2) Individuals connected through relationships such as comrades-in-arms, fellow townspeople, alumni, close friends, etc.;
- (3) Other persons with whom an employee has abnormal economic transactions or engages in improper transfer of benefits.

## 5 舞弊管理 Fraud Management

### 5.1 索要或收受贿赂 Soliciting or Accepting Bribes

5.1.1 索要或收受贿赂，指公司员工利用职务便利，以个人（员工本人及特定关系人员）或所在组织的名义，索要或接受公司内部或外部单位、人员以任何形式给付的业务合同约定内容之外且超过常规礼尚往来标准的各类给予或馈赠，包括有形（如现金、实物、礼品、礼金、回扣、红包、劳务费、好处费等）和无形（生活便利条件、商业机会、职业发展机会、性贿赂等）的形式。

Soliciting or accepting bribes refers to an employee of the company, exploiting their position of authority, either in their own name (for themselves or specific related persons) or in the name of their organization, demanding or accepting any form of undue benefit or gift from internal or external entities or individuals beyond what is stipulated in business contracts and which exceeds customary standards of courtesy. This includes both tangible (e.g., cash, goods, gifts, cash presents, kickbacks, red envelopes, service fees, favors, etc.) and intangible forms (e.g., lifestyle conveniences, business opportunities, career advancement opportunities, sexual bribes, etc.)

5.1.2 以下情况属于常见的索要或收受贿赂的具体行为，应予禁止：

The following specific acts are considered common forms of soliciting or accepting bribes and are prohibited:

1) 员工以任何形式或理由,借用/占用合作方的财物并用于与合作业务合同内容无关的用途,例如为满足个人生活需要向合作方借用资金、通讯工具、交通工具、住房等。

An employee borrowing/using a partner's property for purposes unrelated to the content of the cooperative business contract, such as borrowing funds, communication devices, vehicles, or housing from a partner to meet personal living needs.

2) 员工要求或接受合作方为其进行个人家庭住房装修、婚丧嫁娶活动安排、旅游接待,以及报销任何应由员工个人负担的费用。

An employee requesting or accepting arrangements from a partner for personal home decoration, wedding or funeral activities, travel reception, or the reimbursement of any expenses that should be borne personally by the employee.

3) 员工在未向上级主管领导申请并获同意的情况下,擅自参加合作方邀请的各种庆典、高档宴请和娱乐活动、外出考察参观活动;擅自接受赠送的礼品;擅自接受合作伙伴安排的超过本公司差旅标准 100%以上的餐饮接待、机票舱位、豪华宾馆住宿等。

An employee attending various celebrations, high-end banquets, entertainment events, or outward inspection tours invited by a partner without applying for and obtaining prior consent from their supervising leader; accepting gifts without authorization; accepting dining reception, air ticket classes, or luxury hotel accommodation arranged by a partner that exceeds the company's travel standard by more than 100% without authorization.

4) 员工要求或接受合作伙伴为其配偶及子女提供入学、留学及工作安排。

An employee requesting or accepting arrangements from a partner for school admission, study abroad opportunities, or job placements for their spouse and children.

5) 上级领导索要、接受下级员工给付的超过常规礼尚往来标准的礼品、礼金。

A superior leader soliciting or accepting gifts or cash presents from subordinate employees that exceed customary courtesy standards.

### 5.1.3 对收到礼品的管理要求 Management Requirements for Received Gifts::

1) 公司提倡健康的社会交往风气,为提升公司廉洁自律良好形象,公司所有员工均有义务在对外工作交往中帮助公司建立、维护廉洁自律的形象,有义务在与合作方的交往过程中明确告知对方:“本公司有不允许员工个人擅自接受任何礼品的纪律要求”,包括各类节日庆典的礼品、礼金,以及各类感谢礼品、慰问金、合同约定之外的劳务费等。

The company promotes healthy social conduct. To enhance the company's image of integrity and self-discipline, all employees have an obligation to help establish and maintain this image of probity in external work interactions. They must explicitly inform counterparts: "The company has disciplinary rules prohibiting employees from accepting any gifts personally without authorization," including gifts and cash presents for various festivals and celebrations, as well as thank-you gifts, condolence money, and service fees beyond contract stipulations.

2) 各单位应根据实际情况,对已经收到且无法退回的礼品(例如邮寄送达且未署名的或赠送单位拒绝收回的),上交到集团审计监察部做统一的登记及实物管理。

All units shall, based on actual circumstances, hand over gifts that have been received and cannot be returned (e.g., those delivered by mail without a sender's name or those the giving party refuses to take back) to the Group Audit and Supervision Department for unified registration and physical management.

3) 对员工出席的各类会议、活动上发放的符合会议、活动氛围,或在其他场合收到的符合

节日氛围、当地风俗文化习惯，且价值不高（单价 500 元以下）的纪念品、礼品，在向礼品管理登记部门登记并征得主管领导同意后，可以自行处理，此情况不属于 5.1.2 条款所禁止的擅自接受赠送的礼品的情况。员工遇到价值难以判断，或明显高于 500 元，或最近 1 年内已累计收到超过 5000 元的，仍应在申报登记时主动上交，由礼品统一归口管理部门安排处理。

Souvenirs or gifts received at conferences or events that conform to the occasion's atmosphere, or those received on other occasions that align with festive customs or local cultural practices and are of low value (unit price below RMB 500), may be handled personally by the employee after registering with the designated gift management department and obtaining approval from their supervising leader. This circumstance is not considered unauthorized acceptance of gifts prohibited under clause 5.1.2. If an employee receives a gift whose value is difficult to determine, is clearly above RMB 500, or if the cumulative value of gifts received in the past year exceeds RMB 5,000, they must still proactively hand it over during the declaration and registration process. The centralized gift management department will then arrange for its disposal.

4) 集团审计监察部在收到员工上交礼品时，应及时进行登记。登记的信息至少应包括：送礼单位、上交人、对物品的详细描述、接收人等。礼品管理登记部门应向上交人出具“回执”，上交人后续可以凭“回执”随时要求登记部门说明礼品实物的去向，以对礼品实物管理进行监督。The Group Audit and Supervision Department must promptly register received gifts. Registration information shall include at minimum: the gift-giving unit/individual, the person handing it over, a detailed description of the item, and the recipient. The gift management registration department should provide a "receipt" to the person who handed over the gift. This person can subsequently use this receipt to request the registration department to account for the disposition of the gift at any time, thereby supervising the physical management of gifts.

## 5.2 侵占、挪用公司资产，谋取不当利益 Misappropriation of Company Assets and Seeking Improper Benefits

5.2.1 以伪造合同、伪造签字，虚构交易或事项等欺骗手段，将公司资金、资产等用于个人用途。常见行为包括通过虚构采购业务、虚增合同金额、虚报费用、虚增报废或虚构盘点结果套取公司财物等。

Using deceptive means such as forging contracts or signatures, or fabricating transactions or events, to divert company funds or assets for personal use. Common acts include embezzling company property through fictitious procurement activities, inflating contract values, falsifying expenses, exaggerating scrappage, or fabricating inventory results

5.2.2 利用工作中发现的管理薄弱环节（如出入库明细及流程不清晰等）侵占公司财物。常见行为包括盗窃、隐匿、私分公司财物等。

Exploiting identified weak points in management controls (e.g., unclear warehousing records or processes) to misappropriate company property. Common acts include theft, concealment, or unauthorized distribution of company assets.

5.2.3 挪用公司资金用于个人购房、购车、炒股、资金周转等与工作无关的用途。

Misusing company funds for personal purposes unrelated to work, such as purchasing real estate or vehicles, stock trading, or personal cash flow needs.

5.2.4 未经适当授权批准的公车私用，公房私用。

Using company vehicles or housing for personal purposes without proper authorization.

5.2.5 截留业务过程中发生的各种销售折扣、折让，形成小金库或占为己有。常见行为包括擅自承接业主、合作方的工作任务并收取报酬；将可以使公司获利的商业机会、投资机会转移到个人与外部单位之间进行等。凡是基于公司之间的业务往来而发生的，均应全部按公司财务制度纳入公司业务核算、管理范围。

Withholding various sales discounts or allowances arising from business operations to create unauthorized funds or appropriate them for personal gain. Common examples include: undertaking tasks for clients or partners without authorization and receiving personal compensation; diverting business or investment opportunities that could benefit the company to transactions between oneself and external entities. All benefits derived from business dealings between the Company and external parties must be fully incorporated into the company's business accounting and management scope in accordance with the company's financial regulations.

5.2.6 利用公司的设备、技术、知识产权、业务渠道、商业秘密、投资机会等，为本人从事牟利活动。常见行为包括将公司技术、信息泄漏给外部其他单位或人员换取个人利益；利用公司设备、平台等从事与工作无关的个人事务等。

Using company equipment, technology, intellectual property, business channels, trade secrets, or investment opportunities for personal profit-making activities. Common examples include: disclosing company technology or information to external parties or individuals in exchange for personal benefit; using company equipment, platforms, or other resources to conduct personal affairs unrelated to work.

5.2.7 未经上级组织批准，在下属企业兼职并在集团内领取多份报酬。

Holding concurrent positions in subsidiary enterprises without approval from the superior organization and receiving multiple remunerations within the group.

5.2.8 违反公司规定标准，开展各类福利活动。例如未经有授权的主管领导审批、无合理原因的情况下，组织小范围员工开展福利活动，或以业务招待费名义报销没有外部接待对象参加的小范围内部员工招待活动。

Conducting various welfare activities in violation of company standards. For example: organizing welfare activities for a small group of employees without approval from an authorized supervisor and without a valid reason; or seeking reimbursement under the category of business entertainment for internal employee hospitality activities involving a small group with no external guests present.

### 5.3 为谋取不当利益，超越授权、违反流程、弄虚作假 Exceeding Authority, Violating Procedures, or Falsification for Improper Gain

5.3.1 超越权限或违反流程进行重大决策，并为个人或所在单位谋取不当利益。重大决策包括资金调拨、借贷、对外投资、融资、担保、重大技术改造、引进重要技术和设备、进行新产品开发、生产、转让等。

Making major decisions by exceeding authority or violating procedures to seek improper benefits for oneself or one's unit. Major decisions include fund allocation, borrowing, external investments, financing, guarantees, major technical renovations, introduction of key technologies/equipment, and new product development/production/transfer.

5.3.2 在员工群体中拉帮结派，违反人事纪律、程序、授权管理标准，对熟识的员工进行任免、

工作调配；在干部考察、员工录用、岗位晋升或职务调整过程中，隐瞒或歪曲事实真相以规避公司的管理规则；对意见不一致的员工实施打击报复等。

Forming factions among employees, violating personnel discipline, procedures, or delegation of authority standards to make appointments, work assignments for familiar staff; concealing or distorting facts during cadre evaluations, employee recruitment, promotions, or position adjustments to circumvent company rules; retaliating against employees who hold differing opinions.

5.3.3 违反公司规定泄露员工工资、奖金等信息，泄露酝酿讨论干部任免、员工调配的情况，且从中谋取个人利益或损害公司利益。

Disclosing employee salary or bonus information contrary to company rules, leaking information concerning deliberated cadre appointments or employee assignments, and seeking personal benefit or causing harm to the company therefrom.

5.3.4 在工作总结、信息整理以及统计汇报中，隐瞒、歪曲或者伪造事实以获取荣誉及其他利益。

Concealing, distorting, or fabricating facts in work summaries, information compilation, or statistical reporting to gain honors or other benefits.

5.3.5 以薪酬待遇、岗位晋升等事项诱使、胁迫员工，为本人提供与工作无关的服务、从事仅对本人有利的事务，或发生不正当关系。

Inducing or coercing employees through promises of compensation, promotion, etc., to provide services unrelated to work, perform tasks solely for one's own benefit, or engage in inappropriate relationships.

5.3.6 故意绕开公司正常的管理审批程序或改变报销审批等级，将应在本人（单位）报销的事项转移到下属（单位）以改变报销审批等级的行为。

Deliberately bypassing normal management approval procedures or altering reimbursement approval levels by transferring items eligible for reimbursement by oneself (or one's unit) to a subordinate (or unit) to change the approval authority.

5.3.7 以逃税为目的，干扰、影响公司依法履行个人所得税代扣代缴义务。

Interfering with or influencing the company's lawful obligation to withhold and remit individual income tax for the purpose of tax evasion.

5.4 违反“利益关系申报、利益冲突回避”原则的行为 Violations of the Principles of "Interest Declaration and Conflict of Interest Avoidance"

利益关系申报、利益冲突回避，是维护公正、廉洁管理秩序的重要机制和保障，所有员工均应主动、及时通过公司的申报平台申报工作中存在的利益关系，并以避免发生利益冲突为原则在工作中主动回避潜在的利益冲突。以下行为均属禁止的行为。

The declaration of interest relationships and the avoidance of conflicts of interest serve as vital mechanisms to uphold fair and ethical management practices. All employees are required to proactively and promptly declare any such relationships or potential conflicts through the company's designated platform. Furthermore, it is imperative to adhere to the principle of conflict avoidance by consciously refraining from actions that may give rise to actual or perceived conflicts in the course of work. The following actions are strictly prohibited.

5.4.1 在未经适当授权批准情况下，自营或者为他人经营与所任职单位、岗位同类的业务。常见

行为包括：员工未经授权批准，向与本人任职单位经营范围相同的外部单位直接出资入股（通过股票二级市场进行股票买卖的情况除外），或在外部单位担任职务、领取薪酬等。

Operating, or assisting others in operating, businesses similar to the company's business without appropriate authorization. Common acts include: taking equity stakes (excluding secondary market stock trades) in external entities with similar business scopes, or holding positions/remuneration in such entities without authorization.

#### 5.4.2 未按要求向公司申报利益关系 Failing to declare interests as required:

1) 公司 EIS 系统中设立了“利益关系申报”平台，所有员工均需按要求申报以下内容：

An "Interest Declaration" platform is established within the company's EIS system. All employees are required to declare the following information as stipulated:

- 本人及近亲属（包括但不限于配偶、子女、父母、兄弟姐妹）在外部设立（同类或与公司有业务往来）公司的情况，包括控股及参股外部公司（通过股票二级市场进行股票买卖的情况除外）；

Circumstances where the employee themselves or their immediate family members (including but not limited to spouse, children, parents, siblings) have established external companies (whether similar to the company or having business dealings with the company), including holding controlling interests or participating in external companies (excluding trading stocks on the secondary market).

- 本人与公司合作方（以本人所知的合作方为限）之间存在个人利益关系的情况，包括是否擅自在合作方处兼职、与合作方之间存在与工作内容无关的资金及其他实物资产（车辆、房产等）借用、与合作方共同设立公司或合伙从事投资业务的情况。

Circumstances where a personal interest relationship exists between the employee and the company's business partners (limited to partners known to the employee). This includes whether the employee is working part-time at a partner without authorization, whether there are borrowings of funds or other physical assets (e.g., vehicles, real estate) unrelated to job content between the employee and the partner, and whether the employee has jointly established a company or partnership with a partner for investment activities.

当有以上利益关系发生时，员工应于知道或应当知道之日起 30 日内在 EIS 的“利益关系申报”平台进行变更申报。

When any of the above interest relationships occur, the employee shall submit an updated declaration via the "Interest Declaration" platform in the EIS within 30 days from the date they knew or should have known.

2) “利益关系申报”信息仅作为反舞弊工作资料存档，集团审计监察部负责保证员工个人信息安全，未经员工本人书面形式同意，公司不会将员工所申报的上述信息用于本制度规定之外的任何其他用途。

The declared "Interest Declaration" information is used solely for archiving as part of anti-fraud work materials. The Group Audit and Supervision Department is responsible for ensuring the security of employees' personal information. Without the employee's prior written consent, the company will not use the declared information mentioned above for any purposes other than those specified in this policy.

#### 5.4.3 未对潜在利益冲突进行主动回避 Failure to Proactively Avoid Potential Conflicts of Interest:

1) “利益冲突”指员工的个人利益与员工身份所代表的公司利益之间可能发生的矛盾和冲突。常见的应予以回避的利益冲突事项包括：与本人的近亲属有关的人事任免、工作安排、业务流程

审批及决策：与本人及近亲属之间的，或与其能够控制、获益的外部公司之间的业务合作等。  
"Conflict of Interest" refers to potential contradictions and clashes between an employee's personal interests and the company's interests represented by their role. Common situations requiring avoidance include: personnel appointments and removals, work assignments, business process approvals, and decisions related to the employee's close relatives; business cooperation between the company and the employee themselves, their close relatives, or external companies controlled by or beneficial to them or their close relatives.

2) 公司所有员工在日常工作中遇到与本人有“利益冲突”的情况时，均应及时、主动向上级主管领导或集团审计监察部门汇报，并积极采取回避措施避免发生利益冲突。

All employees must promptly and proactively report situations involving potential conflicts of interest encountered in their daily work to their supervising leader or the Group Audit and Supervision Department, and actively take avoidance measures to prevent conflicts of interest from occurring.

3) 各级主管领导在员工工作安排部署中，应充分考虑避免发生利益冲突。  
Supervisors and managers must fully consider and plan work assignments to avoid conflicts of interest among employees.

4) 所有员工在发生岗位变动、工作内容变化，以及主管领导变化时，应及时自查是否有应当申报及应当回避的利益关系。

Whenever an employee undergoes a change in position, job content, or supervising leader, they must promptly conduct a self-assessment to determine if there are any interests that should be declared or potential conflicts that require avoidance.

## 5.5 行贿 Bribery

本制度所称行贿，指为谋取不正当利益，向国家工作人员或其他企业及个人给予数额较大的财物或好处。常见行为包括：以各种名义给付的超过常规礼尚往来标准的馈赠；免费提供本应由对方负担费用的服务、接待、活动安排；支付没有基于真实业务或不合理的咨询费、手续费、服务费、居间费、顾问费、专家费等。

Bribery, as defined in this policy, refers to offering money, goods, or benefits of significant value to state personnel, other enterprises, or individuals in order to seek improper benefits. Common examples include: gifts exceeding conventional courtesy standards under any pretext; providing services, hospitality, or activity arrangements free of charge that should rightfully be borne by the recipient; paying consulting fees, service charges, intermediary fees, advisor fees, or expert fees that are not based on genuine business activities or are unreasonable.

### 5.5.1 对馈赠礼品及接待活动的管理要求 Management Requirements for Gift-Giving and Hospitality Activities:

作为感谢合作方的支持，或出于礼节性的拜访，可以馈赠一些公司纪念品。各单位礼品归口管理部门应切实做好礼品的设计，以送文明、送健康、送时尚等人文关怀为思路，根据交往对象的实际情况，设计开发新颖、有意义，能够代表公司文化、表达感激心意和交往诚意的礼品，确保在礼尚往来过程中，远离涉嫌行贿的行为。

As a gesture of gratitude for a partner's support or for courtesy visits, company souvenirs may be given. The department responsible for gifts within each unit should focus on gift design with an emphasis on conveying civility, health, and fashion, reflecting humanistic care. Based on the actual circumstances of the recipient, they should design and develop novel, meaningful gifts that represent the company's culture, express gratitude, and demonstrate sincerity in interaction,

ensuring that such exchanges steer clear of any suspicion of bribery.

5.5.2 在与政府、行政管理部门的工作交往中，全体员工应认真学习并严格遵守中央关于实行党风廉政建设、反腐倡廉八项规定等要求；禁止安排超过政府部门管理规定标准的豪华宴请、接待活动；禁止向公职人员及其近亲属馈赠大额财物、提供免费出国、旅游等安排；禁止以吃空饷的方式或高于市场薪酬水平、岗位职级标准，违规聘用政府机关、监管机构、合作方等利益相关方人员及特定关系人员。

In interactions with government and administrative departments, all employees must diligently study and strictly adhere to the central authorities' requirements regarding clean party conduct and government building, and the "Eight Provisions" against extravagance and bureaucracy. The following are prohibited: arranging lavish banquets or reception activities exceeding standards stipulated in government regulations; giving large sums of money or gifts, or providing free overseas travel, tourism, or similar arrangements to public officials or their close relatives; illegally hiring individuals from government agencies, regulatory bodies, partners, and other stakeholders, or their specific related persons, either by creating sinecures ("eating empty pay") or by offering compensation above market rates or position grade standards.

## 5.6 违反财经法规，进行虚假记载 Violation of Financial Laws and Regulations, Falsifying Records

5.6.1 虚构交易，掩饰真实业务内容。

Fabricating transactions to conceal the true nature of business activities.

5.6.2 伪造、变造会计记录或原始单据，影响财务核算的真实、准确。

Counterfeiting or altering accounting records or original documents, affecting the truthfulness and accuracy of financial accounting.

5.6.3 故意隐瞒、错报、漏报业务交易事项，粉饰公司财务报表。

Intentionally concealing, misstating, or omitting business transactions to embellish the company's financial statements.

5.6.4 违规泄露会计信息。

Disclosing accounting information in violation of regulations.

## 6 反舞弊工作组织机构和职责分工 Organization Structure and Responsibility Assignment for Anti-Fraud Work

### 6.1 公司董事会 Company Board of Directors

6.1.1 公司董事会对公司反舞弊工作负领导责任，董事会负责督促管理层建立健全反舞弊机制、不断改善文化环境，以确保反舞弊相关内部控制的有效运行。

The Company's Board of Directors bears the leadership responsibility for the company's anti-fraud work. The Board is responsible for urging the management to establish and improve anti-fraud mechanisms and continuously improve the cultural environment to ensure the effective operation of anti-fraud related internal controls.

6.1.2 公司董事会审计委员会对公司审计监察部的反舞弊工作，进行协调、指导和监督。

The Board's Audit Committee coordinates, guides, and supervises the anti-fraud work carried out by the Company's Audit and Supervision Department.

## 6.2 公司管理层 Company Management

对预防舞弊行为的发生以及对舞弊行为责任人的处理，承担管理责任。管理层负责建立、健全并有效实施包括舞弊风险评估和预防舞弊在内的反舞弊程序和控制，并进行自我评估。

The Management bears the management responsibility for preventing the occurrence of fraudulent acts and for the handling of personnel responsible for such acts. The Management is responsible for establishing, improving, and effectively implementing anti-fraud procedures and controls, including fraud risk assessment and fraud prevention, and for conducting self-assessments.

## 6.3 集团审计监察部 Group Audit & Supervision Department

公司反舞弊工作的日常工作部门，负责通过对各业务单元、子公司的审计监察，促进反舞弊工作的实施，具体包括：

As the department responsible for the day-to-day operations of the company's anti-fraud work, the Group Audit and Supervision Department promotes the implementation of anti-fraud work through audits and inspections of various business units and subsidiaries. Specific responsibilities include:

1) 受理、登记相关舞弊举报工作；

Receiving and registering reports related to fraud

2) 对舞弊事件进行调查，核实事实真相，落实责任人，形成调查结论；

Investigating fraud incidents, verifying the facts, identifying responsible persons, and forming investigation conclusions;

3) 对舞弊事件所涉及的责任人进行处理或提出处理建议；

Handling personnel involved in fraud incidents or proposing handling recommendations;

4) 开展反舞弊预防宣传活动。

Conducting anti-fraud prevention awareness activities.

## 6.4 舞弊行为人的上级主管领导及所在单位人力资源部门 The Immediate Supervisors of Individuals Involved in Fraud and the HR Department of Their Respective Units

负责根据审计监察部调查核实的结果及提出的处理建议，完成对责任人员的处理。处理结果应及时提交集团审计监察部备案。

They are responsible for implementing disciplinary actions against the responsible personnel based on the findings verified by the Audit and Supervision Department and the handling recommendations proposed. The results of such actions shall be promptly submitted to the Group Audit and Supervision Department for filing.

## 6.5 全体员工 All Employees

公司全体员工均有义务积极配合舞弊事件的调查和取证工作。

All employees of the company have the obligation to actively cooperate with the investigation and evidence collection related to fraud incidents.

## 7 反舞弊工作重点风险领域 Key Risk Areas for Anti-Fraud Work

公司各级管理岗位应针对经营管理中容易发生舞弊现象的风险领域和关键环节，把反舞弊落实到组织管理结构、授权审批设计和运行机制的各个环节，融入业务流程和内控制度，有针对性地建章立制，规范权力运行；并重点完善营销、采购、人事、投资、质量、运输、开发、工程、保险、资产管理等关键环节，以及监督公司各级管理人员，防范舞弊风险。

Management at all levels should focus on the risk areas and critical links within operations and management that are prone to fraud. Anti-fraud measures should be integrated into the organizational management structure, the design and operation of authorization and approval processes, and embedded into business processes and internal control systems. Targeted policies and procedures should be established to regulate the exercise of power. Key areas requiring particular attention include improving controls in critical links such as marketing, procurement, human resources, investment, quality, transportation, development, engineering, insurance, and asset management, as well as supervising management at all levels to prevent fraud risks.

## 8 舞弊的预防和控制 Fraud Prevention and Control

### 8.1 反舞弊工作内容 Content of Anti-Fraud Work

反舞弊工作主要包括：倡导诚信的企业文化，营造反舞弊的工作环境和氛围；评估舞弊风险并不断建立健全具体的控制程序和机制；进行舞弊举报的接收、调查、报告和提出处理建议等。Anti-fraud work primarily includes: promoting an ethical corporate culture and fostering an anti-fraud work environment and atmosphere; assessing fraud risks and continuously establishing and improving specific control procedures and mechanisms; and handling the receipt, investigation, reporting of fraud reports, and proposing handling recommendations.

### 8.2 倡导诚信的企业文化，营造反舞弊工作环境和氛围 Promoting an Ethical Corporate Culture and Fostering an Anti-Fraud Work Environment and Atmosphere

倡导诚信正直的企业文化包括但不限于以下方式：

Promoting an ethical and upright corporate culture includes, but is not limited to, the following methods:

1) 公司管理层坚持以身作则，并以实际行动带头遵守公司各项制度和流程。

The company's management must lead by example and take the lead in complying with all company systems and procedures through concrete actions.

2) 公司的反舞弊政策和程序及有关措施应在公司内部以多种形式（通过员工手册、规章制度或者 EIS 等方式）进行有效宣传，确保员工接受有关法律法规、职业道德规范的培训，使其明白行为准则涉及的内容；帮助员工识别合法与违法、诚信道德与非诚信道德的行为。各级管理干部均有责任在对下属员工进行任务分配、工作指导时，确保员工清楚公司对待舞弊行为的严肃态度，让员工了解在预防舞弊方面的责任。

The company's anti-fraud policies, procedures, and related measures shall be effectively communicated internally through various means (such as employee handbooks, internal regulations, or the EIS system). This ensures employees receive training on relevant laws, regulations, and professional ethics, helping them understand the code of conduct, distinguish between legal and illegal, ethical and unethical behavior. Managers at all levels are responsible for ensuring, when assigning tasks and providing guidance, that subordinates are fully aware of the company's serious stance on fraudulent conduct and understand their own responsibilities

in fraud prevention.

3) 公司在员工晋升、评优评先、绩效考核、人才盘点等各项活动中，应充分体现道德诚信方面的素质要求。对道德诚信方面存在瑕疵的员工原则上不予晋升、评优。

In activities such as employee promotion, awards, performance appraisals, and talent reviews, the company must fully reflect the requirements for moral integrity and ethical conduct. Employees with identified shortcomings in moral integrity and ethical conduct should generally not be promoted or awarded.

4) 公司应将倡导遵纪守法和遵守诚信道德的信息，以适当形式告知员工，以及与公司直接或间接发生关系的所有利益相关方。具体告知形式包括：员工入职时签署《员工合规承诺 Employee Compliance Commitment》（参见《金风科技合规手册》），在与合作方建立合作关系时双方共同签署《阳光合作协议书》（详见附件一：《阳光合作协议书》）或按照《集团供应商管理办法》要求签署《阳光合作承诺书》。

The company shall communicate the principles of compliance with laws, regulations, and ethical conduct to all employees and stakeholders with direct or indirect relationships with the company in appropriate forms. Specific methods include having new employees sign the Employee Compliance Commitment upon onboarding (refer to the Goldwind Compliance Manual), and having both parties sign a Sunshine Cooperation Agreement when establishing cooperative relationships with partners, or requiring the signing of a Sunshine Cooperation Agreement stipulated in the Group Supplier Management Measures.

### 8.3 评估舞弊风险，建立健全控制程序和机制 Assessing Fraud Risks and Establishing Sound Control Procedures and Mechanisms

评估舞弊风险并不断建立健全具体的控制程序和机制，以减少舞弊发生的机会，主要通过以下措施：

Assessing fraud risks and continuously establishing and improving specific control procedures and mechanisms to reduce opportunities for fraud are achieved mainly through the following measures:

1) 公司管理层每年年初针对公司经营管理的不同层面、业务部门的工作环节、以及公司的财务状况进行全方位的舞弊风险识别和评估。管理层需要运用相应的控制措施以降低舞弊发生的机会。控制措施包括不相容职务分离、授权审批控制、会计系统控制、财产保护控制、预算控制、运营分析控制和绩效考评控制等。将业务舞弊和财务舞弊风险与控制措施相联系，从而在舞弊发生的源头建立控制机制并发挥作用。

At the beginning of each year, the management shall conduct a comprehensive identification and assessment of fraud risks across different levels of company operations and management, various operational links of business departments, and the company's financial status. Management must apply appropriate control measures to reduce fraud opportunities. These control measures include segregation of duties, authorization and approval controls, accounting system controls, asset protection controls, budget controls, operational analysis controls, and performance evaluation controls. Linking business fraud risks and financial fraud risks with control measures helps establish control mechanisms at the source of potential fraud.

2) 健全完善制度动态管理机制，发现疏漏及时弥补，提高制度执行效果。

Improve and perfect the dynamic management mechanism for rules and systems, promptly address identified omissions, and enhance the effectiveness of implementation.

在制度的设计和制定上，认真执行规章制度管理办法，明确界定制度制定的主体权限。严格执行规章制度制定程序，加强制度的集中管理和统一审核，增强制度建设的科学性、系统性、严密性、约束性，使规章制度既符合工作实际，具有操作性，又杜绝管理漏洞，具有约束性和监控性。

In the design and formulation of systems, strictly implement the management measures for rules and regulations, clearly define the authority for system formulation, and rigorously follow the procedures for establishing rules and regulations. Strengthen centralized management and unified review of systems to enhance their scientific, systematic, rigorous, and binding nature, ensuring they are both practical and operable while eliminating management loopholes and being restrictive and monitorable.

在制度的执行上，进一步加强对规章制度执行情况的监督检查，完善和落实规章制度执行情况评估、督办机制，加大对违规行为的追究、问责力度，保证制度的严肃性和权威性，不断提高制度的执行力。

Regarding the implementation of systems, efforts shall be made to further strengthen the monitoring and inspection of the enforcement of rules and regulations, improve and implement mechanisms for evaluating and supervising the enforcement process, intensify the investigation and accountability of violations, and ensure the authority and binding force of the systems, so as to continuously enhance their effectiveness.

实行规章制度动态管理。定期对规章制度进行清理、评估，并根据执行中出现的问题，不断修订完善或更新，提高制度建设和管理水平。实现规章制度制定、宣贯、修订完善、废止、监督检查的动态管理运行机制。

Implement dynamic management of systems, regularly review, evaluate, and revise them based on issues identified during implementation, or update them to improve the level of system construction and management. Realize a dynamic operational mechanism covering the formulation, communication, revision, abolition, and supervision of systems.

## 9 舞弊案件的举报、调查、报告及对举报人的保护和奖励 Reporting, Investigation, Handling of Fraud Cases, and the Protection and Reward for Whistleblowers

9.1 审计监察部负责建立舞弊举报渠道，接收并受理针对公司内部员工的举报信息。

The Audit and Supervision Department is responsible for establishing channels for reporting fraud and for receiving and handling reports concerning company employees.

审计监察部有专人随时查阅举报邮箱并形成记录，确保举报被及时受理。

The Audit and Supervision Department assigns dedicated personnel to regularly check the reporting email inbox and maintain records, ensuring reports are promptly addressed.

举报电话：86-010-67511888-1127 Reporting Hotline: 86-010-67511888-1127

电子邮箱：audit@goldwind.com Email: audit@goldwind.com

通信地址：北京市经济技术开发区博兴一路8号 金风科技集团审计监察部（邮编：100176）。  
Mailing Address: Goldwind Science & Technology Group, Audit and Supervision Department, No. 8 Boxing 1st Road, Beijing Economic-Technological Development Area, Beijing, China (Postal Code: 100176).

9.2 审计监察部收到举报后，应在3个工作日内告知举报人和所有收到举报信息的员工以下信息：举报事项已由审计监察部受理，对事项的判定请以审计监察部的调查结果为准。

Upon receiving a report, the Audit and Supervision Department shall, within three business days, notify the whistleblower and all employees who received the report of the following: the reported matter has been accepted by the Audit and Supervision Department, and the outcome of its investigation shall be the basis for determining the matter.

9.3 审计监察部对举报的调查应包括所有举报内容。调查过程中应以事实为依据，充分取证，广泛征求意见，必要时可与人力资源等相关部门或聘请外部专家共同组成调查小组进行调查。调查结论应与举报人充分沟通。

Investigations by the Audit and Supervision Department shall cover all reported content. The investigation process must be fact-based, involve sufficient evidence collection, and solicit broad input. When necessary, a joint investigation team may be formed with relevant departments such as Human Resources or by engaging external experts. The investigation conclusions shall be fully communicated with the whistleblower.

1) 为有效控制举报事件的影响，避免因信息不对称造成的不良舆论，审计监察部应视具体情况，主动向举报人、相关当事人反馈调查进展和结果。

To effectively manage the impact of reported incidents and avoid negative舆论 arising from information asymmetry, the Audit and Supervision Department shall, depending on the specific circumstances, proactively provide feedback on the investigation progress and results to the whistleblower and relevant parties involved.

2) 对舞弊案件调查结束，应由审计监察部独立完成舞弊案件调查报告，并依据案件性质向相关领导、总裁、董事长、决策委员会、审计委员会、董事会提交报告及汇报调查结果。

Upon conclusion of a fraud case investigation, the Audit and Supervision Department shall independently complete an investigation report. Depending on the nature of the case, the report and findings shall be submitted to relevant leaders, the President, the Chairman of the Board, the Decision-Making Committee, the Audit Committee, and/or the Board of Directors for reporting.

3) 为有效应对个别举报人恶意的为制造影响而高频率举报，对同一举报事件在出具审计报告后再次出现举报的，如果没有新的证据出现，原则上不再重新开展调查。对恶意举报和诬告陷害的，审计监察部将视情节严重程度移送司法机关处理。

To effectively address situations where individual whistleblowers submit frequent reports with malicious intent to create undue influence, if the same incident is reported again after the audit report has been issued and no new evidence is presented, re-investigation will generally not be conducted in principle. Cases involving malicious reporting or false accusations may be referred to judicial authorities by the Audit and Supervision Department, depending on the severity of the circumstances.

9.4 公司鼓励并保护举报人，并制定了相应的保护措施，详见《举报人保护管理办法》。

The company encourages and protects whistleblowers and has established corresponding protective measures, as detailed in the Whistleblower Protection Management Measures.

9.5 公司实行舞弊举报奖励制度，以鼓励知情者积极实名举报、如实客观的反映腐败问题。奖励对象包括实名举报的个人和外部单位，所有举报信息，经查所举报问题情况属实的，将视结果给予提供有价值线索的举报人3000元以上奖励。对最终被司法机关定性为刑事案件的举报，对举报人的奖励金额视案值大小而定，最低人民币20000元。监察部门根据举报人提供线索价值、调查过程中举报人配合程度及查实案件的重要性，综合核定举报奖励金额。

The company implements a reward system for fraud reporting to encourage informed parties to report actively, objectively, and truthfully. Rewards are available to individuals and external entities who report using their real names. Reports that are verified as accurate will lead to rewards of no less than RMB 3,000 for providing valuable clues. For reports that ultimately lead to criminal cases recognized by judicial authorities, the reward amount will be determined based on the case value, starting from a minimum of RMB 20,000. The supervision department comprehensively determines the final reward amount based on the value of the clues provided, the whistleblower's level of cooperation during the investigation, and the significance of the verified case.

## 10 舞弊行为的补救及处分措施 Remedial and Disciplinary Measures for Fraudulent Conduct

10.1 公司发生舞弊案件后，责任部门应有评估和改进内部控制的书面报告，对责任人采取适当的处分措施。

Following the occurrence of a fraud case, the responsible department must produce a written report assessing and improving internal controls, and take appropriate disciplinary measures against the responsible parties.

10.2 员工个人、部门或单位的舞弊行为所得经济利益，应全额上缴公司。各单位对收缴的舞弊所得应按公司财务制度进行处理，纳入正常财务核算，禁止私设账户存放。

Any economic benefits obtained by an individual employee, department, or unit through fraudulent conduct must be fully surrendered to the company. All units must handle the recovered proceeds according to the company's financial system, incorporating them into normal financial accounting. It is prohibited to deposit such proceeds in private accounts.

10.3 收缴舞弊所得的同时，应视具体情节，依据《集团奖惩管理制度》，适用不同处分方式：警告、严重警告、降级、降岗、解除劳动关系。除对情节轻微的舞弊所进行的警告处分之外，严重警告及以上级别的处分，均应在全集团范围进行通报公示。本制度第10章“舞弊行为的补救及处分措施”规定与《集团奖惩管理制度》不一致的，以《集团奖惩管理制度》为准。

Concurrent with the recovery of proceeds, appropriate disciplinary actions, as stipulated in the Group Reward and Punishment Management System, shall be applied based on the specific circumstances. These actions include: warning, serious warning, demotion, rank reduction, and termination of labor relations. Except for warnings issued for minor infractions, disciplinary actions at the level of serious warning and above must be announced and publicized throughout the entire group. In case of any inconsistency between the provisions of this Chapter 10 and the Group Reward and Punishment Management System, the latter shall prevail.

10.4 对舞弊行为进行处分时，如果舞弊行为的影响可以折算为金额的，可参照以下标准：

When determining disciplinary actions for fraudulent acts, if the impact can be quantified monetarily, the following standards may be referenced:

1) 舞弊金额一年内累计未达到 5000 元的，除舞弊所得全额退缴公司外，应处以警告处分；  
If the cumulative amount involved in fraud within one year is less than RMB 5,000, in addition to the full recovery of the proceeds, a warning sanction shall be imposed.

2) 舞弊金额一年内累计达到 5000 元但未达到 2 万元的，除舞弊所得全额退缴公司外，同时应处以严重警告、降级、降岗处分，并应调整工作岗位；

If the cumulative amount involved in fraud within one year reaches RMB 5,000 but is less than RMB 20,000, in addition to the full recovery of the proceeds, sanctions such as a serious warning, demotion, or rank reduction shall be imposed, and the individual's position must be adjusted.

3) 舞弊金额一年内累计达到 2 万元的, 除舞弊所得全额退缴公司外, 同时应处以解除劳动关系处分。

If the cumulative amount involved in fraud within one year reaches RMB 20,000 or more, in addition to the full recovery of the proceeds, termination of labor relations shall be imposed.

10.5 如符合下列情形之一, 应当从重处罚:

Penalties shall be aggravated under any of the following circumstances:

1) 妨碍、逃避或者抗拒审计监察人员调查的;

Obstructing, evading, or resisting investigations conducted by audit and supervision personnel.

2) 伪造、变造资料, 向调查人员提供虚假资料的;

Fabricating or altering materials, or providing false information to investigators.

3) 两次及以上违反公司反舞弊制度被处罚的;

Being penalized for violating the company's anti-fraud policies on two or more occasions.

4) 给公司声誉造成不良影响的。

Causing damage to the company's reputation.

10.6 如符合下列情形之一, 可以从轻处罚:

Penalties may be mitigated under any of the following circumstances:

1) 主动坦白舞弊事实;

Voluntarily confessing to the fraudulent act.

2) 主动上交舞弊所得, 为公司追回损失;

Proactively surrendering the illicit proceeds and contributing to the recovery of the company's losses.

3) 主动反应公司其他舞弊问题, 查证属实的。

Actively reporting other fraudulent issues within the company, which are verified upon investigation.

10.7 对以下所列示的主观故意明显、性质严重的舞弊行为, 一律适用解除劳动关系处分:

Termination of labor relations shall be mandatorily applied to the following types of fraud, which demonstrate clear subjective intent and are of a serious nature:

1) 对主动索贿, 主动索要回扣、佣金的行为, 无论金额大小、是否索取成功, 均适用解除劳动关系处分。

Actively soliciting bribes, kickbacks, or commissions, regardless of the amount or whether the solicitation was successful.

2) 对未经授权且未按规定申报的在公司外部自营或者为他人经营与所任职单位、岗位同类的业务的情况, 无论情节轻重, 均适用解除劳动关系处分。

Operating, or being employed by, an external business that competes with the company's business, without authorization and without making the required declaration, regardless of the severity.

3) 对行贿的行为, 无论情节轻重, 均适用解除劳动关系处分。

Engaging in bribery, regardless of the circumstances.

4) 对泄露举报人员信息、对举报人员采取打击报复，以及编造情节进行恶意举报的，无论情节轻重，均适用解除劳动关系处分。

Disclosing whistleblower information, retaliating against whistleblowers, or making malicious false reports, regardless of the severity.

10.8 经调查核实，对事实清晰，适用惩处标准明确的，审计监察部可要求相关责任部门按照《集团奖惩管理制度》“5.5 惩处的主要措施”、“5.7 惩处的实施流程”中的相关标准和程序，在限定期限内，做出惩处决定。如相关责任部门未能在限定期限内做出惩处决定的，审计监察部可以根据前述《集团奖惩管理制度》中的适用标准，直接对责任人做出警告、严重警告、降级、降岗直至解除劳动关系的惩处决定。

Upon investigation and verification, if the facts are clear and the applicable disciplinary standards are unequivocal, the Audit and Supervision Department may require the relevant responsible department to render a disciplinary decision within a stipulated time limit, in accordance with the relevant standards and procedures outlined in "Section 5.5 Principal Disciplinary Measures" and "Section 5.7 Disciplinary Implementation Process" of the Group Reward and Punishment Management System. Should the relevant responsible department fail to make a disciplinary decision within the specified time limit, the Audit and Supervision Department may directly impose sanctions on the responsible person, ranging from a warning and severe warning to demotion, rank reduction, and up to termination of labor relations, based on the applicable standards of the aforementioned Group Reward and Punishment Management System.

10.9 除10.7所述适用解除劳动关系处分之外的舞弊行为，在进行处分时除可参照上述10.4中规定的金额标准外，还应考虑视当事人态度、一贯表现，情节和后果的严重程度等因素。

For fraudulent acts not mandating termination under Article 10.7, disciplinary actions may be determined with reference to the monetary standards in Article 10.4, while also considering factors such as the individual's attitude, past conduct, and the severity of the circumstances and consequences.

10.10 公司人力资源部门应建立健全员工行为档案，对所有由于舞弊行为受到公司惩处的事件进行登记。由于舞弊行为受到公司惩处的员工，自做出处分决定时起，一年内不得参与公司任何奖励的评选，不得参与涨薪。公司各级单位对本制度的执行情况应列为相关干部述职和考核的重要标准，考核结果将作为任免、奖惩的重要依据。

The company's Human Resources department shall establish and maintain sound employee conduct files, recording all incidents where penalties are imposed due to fraudulent behavior. Employees penalized for fraud shall be ineligible for any company awards or salary increases for one year starting from the date the disciplinary decision is made. The implementation of this system by all company units at various levels shall be an important criterion in the performance evaluations and assessments of relevant managers, and the evaluation results will serve as a key basis for appointments, removals, rewards, and punishments.

10.11 二人以上（含二人）共同违纪的，职务较高者负主要责任，适用加重处分。

In cases involving collusion by two or more individuals, the person holding the higher position shall bear primary responsibility and be subject to aggravated penalties.

10.12 对发生舞弊行为的业务单位，负有直接管理责任的直管领导应承担主管责任，更高一级分管领导承担领导责任。舞弊终身责任制，每位管理者须对任期内所分管业务发生的舞弊行为负责。

For business units where fraud occurs, the directly supervising manager shall bear direct management responsibility, and the next higher-level supervising leader shall bear leadership responsibility. The principle of lifelong responsibility for fraud applies; each manager is responsible for fraudulent activities that occur within their purview during their term of office.

10.13 在业务活动中，应事先与合作伙伴明确约定反舞弊相关要求，如禁止贿赂、回扣、利益输送等舞弊行为，一旦发现不正当利益往来，我方有权根据情节严重程度对合作伙伴予以降级、终止合作等处罚，若舞弊行为涉嫌构成犯罪将依法移送司法机关。

In business activities, anti-fraud requirements, such as the prohibition of bribery, kickbacks, and improper benefit transfers, must be clearly agreed upon in advance with partners. Upon discovery of any improper exchange of benefits, the company has the right to impose penalties on the partner, such as downgrading the partnership or terminating cooperation, depending on the severity. If the fraud is suspected to constitute a crime, the case will be transferred to judicial authorities.

10.14 对所有触犯国家法律的舞弊行为，公司将通过向公安机关报案或向法院提起诉讼等方式将相关人员移送司法机关处理。

The company will refer all fraudulent acts that violate national laws to judicial authorities for handling, by reporting to public security organs or filing lawsuits with the courts.

## 11 附则 Supplementary Provisions

本文件由金风科技集团审计监察部负责解释，自发布之日起实施。

This document shall be interpreted by the Group Audit & Supervision Department and shall come into effect on the date of its promulgation.

