

亨通光电供应商行为准则

一、前言

（一）目的

为推动全球可持续发展，构建绿色、透明、负责任的供应链体系，江苏亨通光电股份有限公司（以下简称“亨通光电”）特制定本《供应商行为准则》（以下简称“本准则”）。本准则明确供应商在合规经营、环境保护、社会责任及可持续发展方面的基本要求，是亨通光电供应链管理和供应商合作的重要依据。

（二）适用范围

本准则适用于所有向亨通光电及其控股公司提供产品或服务的供应商及合作伙伴。供应商应遵守本准则各项要求，并将其传达至下游供应商和分包商。

二、合规与诚信经营

（一）遵守法律法规

供应商须严格遵守所在国家及地区的法律法规及行业规范，包括但不限于劳动、环境、税务、反垄断、出口管制及经济制裁等规定，禁止任何违法违规行为。

（二）反贿赂与反腐败

供应商不得以任何形式提供或接受贿赂、回扣、商业贿赂或其他不正当利益。所有商业行为应公正、透明、可追溯，维护亨通光电及供应商自身的声誉。

（三）利益冲突管理

供应商应识别并及时披露潜在利益冲突，采取有效措施避免损害亨通光电利益，并确保业务决策独立、透明。

三、人权与劳工标准

（一）禁止强迫劳动与童工

供应商不得使用童工、强迫劳动、奴役劳动或任何形式的非法劳工。招聘过程中不得收取员工费用或扣留身份证件、劳动合同等。

（二）工资、工时与休息权利

供应商应按法律法规支付薪酬，确保工资及时足额发放。合理安排工作时间与休息，遵守法定假期及加班规定。

（三）平等与非歧视

供应商应提供公平、平等的工作环境，禁止基于性别、年龄、种族、宗教、国籍、婚姻状况或其他个人特征的歧视行为。

四、 健康、安全与工作环境

（一） 职业健康与安全保障

供应商应提供安全、健康的工作环境，建立职业健康与安全管理体系，识别并控制潜在风险，防止工伤事故发生。

（二） 培训与应急机制

供应商应定期开展安全培训，提升员工安全意识，并建立有效的应急预案与演练机制，确保突发事件得到及时处置。

（三） 安全文化推广

供应商应倡导安全文化，鼓励员工发现、报告和消除潜在安全风险，实现全员参与的安全管理。

五、 环境与可持续发展

（一） 符合法规与防止污染

供应商须遵守环境保护法律法规，采取必要措施防止污染事件，确保生产与运营过程对环境影响最小化。

（二） 节能减排与资源循环利用

供应商应积极推进节能减排，降低碳排放和能源消耗，推动废弃物循环利用与资源节约。

（三） 绿色材料与负责任采购

供应商应优先采用绿色环保材料和工艺，确保采购来源合法合规，并推动供应

链绿色转型。

（四）碳足迹与产品环境信息（EPD）

在条件允许下，供应商应提供产品生命周期相关信息，包括碳足迹、环境产品声明（EPD）等，以提升产品环境透明度。

六、 供应链责任与管理

（一）原材料来源与冲突矿产管控

供应商应确保原材料来源合法合规，避免使用冲突矿产、高环境风险材料或涉及严重社会争议的材料。

（二）供应链透明度与可追溯性

供应商应建立可追溯体系，确保下游供应商和分包商遵守本准则，实现供应链透明和可控。

（三）供应商考核与持续改进

供应商应积极参与亨通光电定期审核与评估，持续改进管理水平，提升合规、环境及社会责任表现。

七、 信息安全与知识产权

（一）商业机密保护

供应商应妥善保管亨通光电及客户的商业机密、专有信息及技术资料，未经授权不得泄露、转让或用于其他用途。

（二）数据安全与隐私管理

供应商应确保数据安全与隐私保护，遵守适用的个人信息和数据保护法律法规，防止信息泄露或滥用。

八、 监督与执行

（一）审核与评估机制

亨通光电将定期对供应商进行合规、环境及社会责任审核，供应商应配合提供

必要资料和现场支持。

（二）举报与违规处理

供应商及其员工可通过亨通光电设立的渠道举报潜在违规行为。亨通光电将对举报内容进行保密处理，并依法调查。

（三）违规后果与合作终止

对违反本准则的供应商，亨通光电可根据情节轻重采取警告、整改、扣减订单或终止合作等措施，并保留追究法律责任的权利。

九、 承诺与生效

（一）持续改进与合作

供应商承诺持续改进合规、环保及社会责任管理水平，积极参与相关培训和改进活动，与亨通光电共同实现绿色转型和高质量发展。

（二）生效与有效期

本规范自发布之日起生效，有效期为五年。如遇重大变化或调整事项，将另行公布修订内容。

江苏亨通光电股份有限公司

签发人：  _____

职位： 总经理

发布日期： 2025 年 9 月 30 日

Hengtong Optic-Electric Supplier Code of Conduct

I. Preface

1. Purpose

To promote global sustainable development and build a green, transparent, and responsible supply chain system, Hengtong Optic-Electric Co., Ltd. (hereinafter referred to as “HTGD”) has established this *Supplier Code of Conduct* (hereinafter referred to as “the Code”). The Code sets forth the fundamental requirements for suppliers in compliance, environmental protection, social responsibility, and sustainable development. It serves as an important foundation for the company’s supply chain management and cooperation with suppliers.

2. Scope of Application

This Code applies to all suppliers and business partners providing products or services to HTGD and its subsidiaries. Suppliers shall comply with all requirements outlined in this Code and communicate them to their downstream suppliers and subcontractors.

II. Compliance and Ethical Business Practices

1. Compliance with Laws and Regulations

Suppliers must strictly comply with the laws, regulations, and industry standards of the countries and regions in which they operate. This includes, but is not limited to, labor, environmental, tax, antitrust, export control, and economic sanctions regulations. Any form of illegal or non-compliant conduct is strictly prohibited.

2. Anti-Bribery and Anti-Corruption

Suppliers shall not offer or accept bribes, kickbacks, commercial inducements, or any other improper benefits in any form. All business activities must be conducted fairly, transparently, and traceably to safeguard the reputation of both HTGD and the supplier.

3. Conflict of Interest Management

Suppliers must identify and disclose potential conflicts of interest in a timely manner, adopt effective measures to prevent harm to HTGD's interests, and ensure business decisions are independent and transparent.

III. Human Rights and Labor Standards

1. Prohibition of Forced and Child Labor

Suppliers must not employ child labor, forced labor, bonded labor, or any form of illegal employment. During recruitment, suppliers shall not charge fees to employees or withhold identity documents, labor contracts, or other personal property.

2. Wages, Working Hours, and Rest Rights

Suppliers shall comply with applicable laws and regulations regarding wages, working hours, and benefits. Wages must be paid in full and on time. Reasonable working hours, statutory holidays, and overtime regulations must be observed.

3. Equality and Non-Discrimination

Suppliers shall provide a fair and equal workplace, free from discrimination based on gender, age, race, religion, nationality, marital status, or other personal characteristics.

IV. Health, Safety, and Working Environment

1. Occupational Health and Safety

Suppliers must provide a safe and healthy working environment, establish occupational health and safety management systems, identify and control potential risks, and prevent workplace accidents.

2. Training and Emergency Preparedness

Suppliers shall conduct regular safety training to enhance employee awareness and establish effective emergency response plans and drills to ensure timely handling of incidents.

3. Safety Culture Promotion

Suppliers are encouraged to foster a strong safety culture, motivating employees to identify, report, and eliminate potential risks, thereby ensuring full participation in workplace safety management.

V. Environment and Sustainable Development

1. Legal Compliance and Pollution Prevention

Suppliers must comply with environmental protection laws and regulations and take necessary measures to prevent pollution, minimizing environmental impacts during production and operations.

2. Energy Conservation, Emission Reduction, and Resource Recycling

Suppliers shall actively implement energy-saving and emission-reduction initiatives, reduce carbon emissions and energy consumption, and promote waste recycling and resource efficiency.

3. Green Materials and Responsible Sourcing

Suppliers are encouraged to prioritize the use of environmentally friendly materials and processes, ensure the legality and compliance of procurement sources, and drive the green transformation of the supply chain.

4. Carbon Footprint and Environmental Product Declarations (EPD)

Where feasible, suppliers shall provide product lifecycle environmental information, including carbon footprint data and Environmental Product Declarations (EPDs), to enhance environmental transparency.

VI. Supply Chain Responsibility and Management

1. Raw Material Sourcing and Conflict Minerals Control

Suppliers must ensure raw materials are sourced legally and responsibly, avoiding the use

of conflict minerals, high-risk environmental materials, or materials associated with severe social controversies.

2. Supply Chain Transparency and Traceability

Suppliers shall establish traceability systems to ensure that their downstream suppliers and subcontractors also comply with this Code, thereby ensuring supply chain transparency and control.

3. Supplier Assessment and Continuous Improvement

Suppliers are expected to actively participate in HTGD's regular audits and evaluations, continuously improving management standards and enhancing performance in compliance, environmental, and social responsibility.

VII. Information Security and Intellectual Property

1. Protection of Confidential Information

Suppliers must properly safeguard HTGD's and customers' confidential business information, proprietary data, and technical documents. Unauthorized disclosure, transfer, or misuse is strictly prohibited.

2. Data Security and Privacy Management

Suppliers shall ensure data security and personal information protection, complying with applicable data protection and privacy laws to prevent unauthorized use or disclosure.

VIII. Oversight and Enforcement

1. Audit and Assessment Mechanisms

HTGD will regularly audit suppliers' compliance with legal, environmental, and social responsibility requirements. Suppliers shall cooperate by providing necessary documentation and on-site support.

2. Reporting and Whistleblowing

Suppliers and their employees may report suspected violations through designated

channels established by HTGD. Reports will be treated confidentially and investigated in accordance with applicable laws.

3. Consequences of Non-Compliance

Suppliers found in violation of this Code may face warnings, mandatory corrective actions, order reductions, termination of cooperation, or legal accountability, depending on the severity of the violation.

IX. Commitment and Effectiveness

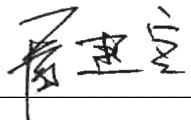
1. Continuous Improvement and Collaboration

Suppliers commit to continuously improving compliance, environmental protection, and social responsibility practices, actively participating in relevant training and improvement initiatives, and working with HTGD to achieve green transformation and high-quality development.

2. Effectiveness and Validity

This Code shall take effect upon publication and remain valid for five years. In the event of major changes or adjustments, updated provisions will be announced separately.

Hengtong Optic-Electric Co., Ltd.

Authorized by: 

Position: General Manager

Date of Issue: September 30, 2025