

# 歌尔商业行为准则

## Goertek Code of Business Conduct

### 公司商业行为遵循的基本原则 / Core Principles of Business Conduct

公司所有商业行为应遵守运营所在地的法律法规，确保公司业务在公平、公正、透明及诚信的基础上开展。  
All business activities must comply with applicable laws and regulations in the regions where we operate, ensuring that all business is conducted fairly, impartially, transparently, and with integrity.

建立本准则，旨在防治舞弊、加强公司治理和内部控制、规范经营行为、维护股东合法权益、促进公司健康稳定发展。

This Code is established to prevent fraud, strengthen corporate governance and internal controls, standardize business practices, protect shareholder rights, and promote the healthy and sustainable development of the company.

### 适用范围 / Scope of Application

本准则的适用范围为歌尔股份有限公司及子公司的所有员工（包括全职、兼职）；同时倡议与歌尔股份发生业务往来利益相关方的工作人员遵守本准则。

This Code applies to all employees (including full-time and part-time) of Goertek Inc. and its subsidiaries. It is also advocated that stakeholders who have business dealings with Goertek comply with this Code.

### 1、基本准则 / Basic Principles

本公司对任何形式的贿赂和腐败行为持零容忍态度。公司员工及其代表不得直接或间接地向任何第三方（包括政府官员、客户、合作伙伴等）提供、承诺、要求或接受任何形式的不当利益（包括金钱、礼品、招待、好处或其他利益），以谋求或维持业务利益。

Our company has a zero-tolerance attitude towards any form of bribery and corrupt behavior. Employees of the company and their representatives must not directly or indirectly provide, promise, request or accept any form of improper benefits (including money, gifts, hospitality, favors or other benefits) to any third party (including government officials, customers, partners, etc.) in order to seek or maintain business interests.

贿赂和腐败的行为包括但不限于以下几类：

- |                  |                     |
|------------------|---------------------|
| 商业贿赂（如回扣、礼品、招待等） | 内部员工与亲属、朋友等进行商业利益输送 |
| 利用职务便利侵占公司财物     | 挪用公司财物              |
| 盗窃公司财物           | 虚构支付款项              |
| 虚假报销             | 伪造相关会计、支付凭证         |
| 侵犯商业秘密           | 非合理的商业款待与馈赠         |
| 内幕交易             | 侵犯他人隐私获取利益          |
| 其他侵害公司利益各类舞弊行为   |                     |

Bribery and corrupt practices include but are not limited to the following categories:

- Commercial bribery (such as kickbacks, gifts, hospitality, etc.)
- Taking advantage of one's position to embezzle company assets
- Theft of company property
- False reimbursement
- Infringement of trade secrets
- Insider trading
- Internal employees engage in commercial interest transfer with relatives, friends, etc.
- Misappropriation of company assets
- Fictitious payment amounts
- Falsifying relevant accounting and payment vouchers
- Unreasonable business hospitality and gifts



稽核部（收）；（5）二维码：见公司官网首页。

如各业务部门设置员工建议/意见收集渠道均需至审计稽核部备案，如收到投诉事件，应报告至审计稽核部。

4.2 Complaint Channels: (1) Face-to-face feedback to the Audit Office; (2) Complaint email address: [tousu@goertek.com](mailto:tousu@goertek.com); (3) Complaint phone number: +86-0536-3050999; (4) Mail address: Audit Department, No.268 Dongfang Road, High-tech Industrial Development District, Weifang, Shandong Province, China; (5) QR Code:

If each business department sets up channels for collecting employee suggestions/feedback, they must be registered with the Audit Department. If a complaint is received, it should be reported to the Audit Department.

4.3 举报投诉资料管理：审计稽核部组织将相关资料整理齐全，将电子版、纸质版文档进行统一存档，并能够用于审计委员会的检查。

4.3 Management of Complaint Materials: The Audit Department should organize and file the relevant materials, keeping both electronic and paper documents in a centralized archive, which can be used for inspection by the audit committee.

4.4 事件调查与报告：通过常态化开展走访调研主动了解违规情况，或在接获关于违反本准则的反馈后，调查组应对事件的具体情况进行梳理分析，识别重点，制定稽核调查方案，并由主管批准后实施。最终事件调查报告必须基于事实，准确、客观、简洁、完整、有建设性、及时、分发范围准确。视事件严重程度，由不同层级部门负责人进行签发并汇报公司领导层。公司承诺，对任何涉嫌或实际发生的贿赂和腐败行为进行独立、客观和及时的调查。无论该行为是否通过投诉渠道提出。

4.4 Event Investigation and Reporting: By conducting regular visits and investigations to proactively identify breaches, or upon receiving feedback regarding breaches of the Code, the investigation team should analyze the specific circumstances of the event, identify key points, formulate an audit and inspection plan, and implement it after approval by the supervisor. The final event investigation report must be based on facts, accurate, objective, concise, complete, constructive, timely, and accurately distributed. Depending on the severity of the event, it will be signed off by different levels of department heads and reported to the company's leadership.

作。在商业道德审查过程中，我们关注商业行为的合规性，深入挖掘潜在的管理问题和风险，并针对发现的问题制定改善措施。公司审查机制的执行部门将向董事会和管理层汇报审计结果及纠正措施，确保监督独立性，并将发现的问题进行汇总，公开、透明地处理相关问题并通过会议、内部邮件等渠道向员工进行公示。

The Company has established a three-line-of-defense mechanism (business operations, internal control, and audit) to ensure legal compliance, operational efficiency, and asset security.

Business ethics audits are conducted focusing on process compliance, regulatory adherence, and risk