

反贿赂及反腐败政策声明

Anti-Bribery and Anti-Corruption Policy Statement

高伟电子控股有限公司（以下简称“本公司”）及其旗下所有子公司，始终秉持最高的商业道德和社会责任，严格遵守《中华人民共和国刑法》《反不正当竞争法》等相关法律法规，以及国际反腐败公约和相关国际标准。本公司严格遵循《社会责任手册》《伦理政策》等内部规范，坚决反对并禁止任何形式的贿赂、腐败及其他不正当利益输送行为，致力于在整体运营及供应链全环节中贯彻廉洁治理，维护公司声誉与社会责任。

Cowell e Holdings Inc. (hereinafter referred to as "the Company") and all its subsidiaries are consistently committed to the highest standards of business ethics and social responsibility. We strictly adhere to relevant laws and regulations of the People's Republic of China, such as the *Criminal Law* and the *Anti-Unfair Competition Law*, as well as international anti-corruption conventions and related international standards. The Company strictly follows internal regulations, including the *Social Responsibility Manual* and the *Ethics Policy*, and firmly opposes and prohibits any form of bribery, corruption, and other improper benefit transfers. We are dedicated to implementing clean governance across our overall operations and throughout our supply chain, thereby upholding the Company's reputation and social responsibilities.

我们的承诺

Our Commitment

1. 零容忍原则

Zero-Tolerance Principle

本公司对任何形式的贿赂、腐败行为采取“零容忍”立场。这明确包括但不限于：

The Company adopts a "zero-tolerance" stance towards any form of bribery or corrupt practice. This explicitly includes, but is not limited to:

- **任何形式的贿赂：**无论是直接或间接提供、给予、接受或索取任何有价值物品，以不正当影响商业决策或获取不正当利益。

Any Form of Bribery: Offering, giving, receiving, or soliciting, directly or indirectly, anything of value to unduly influence a business decision or gain an improper advantage.

- **贪污、挪用、侵占公司或第三方资产。**

Embezzlement, Misappropriation, or Misuse of Company or third-party assets.

- **利益输送与冲突：**利用职权或内幕信息为自身、亲友或关联方谋取不正当利益。

Improper Benefit Transfers and Conflicts of Interest: Using authority or insider information to seek improper benefits for oneself, relatives, friends, or related parties.

- 洗钱以及伪造记录、文件以掩盖上述任何行为。

Money Laundering and the Falsification of Records or Documents to conceal any of the above acts.

一经发现任何违反本政策的行为，本公司将依法依规采取严厉措施，包括但不限于纪律处分、解除劳动关系或合作，并保留追究法律责任的权利。

Any violation of this Policy will result in strict measures being taken in accordance with the law and regulations, including but not limited to disciplinary action, termination of employment or business relationships, and reserving the right to pursue legal liability.

2. 供应链合规管理

Supply Chain Compliance Management

我们要求所有供应商、合作伙伴及第三方服务提供商共同遵守本政策所确立的反贿赂与反腐败标准，并在其业务运营中严格禁止任何形式的腐败行为。公司将持续加强对供应链的尽职调查与合规审查，推动全链条的透明与廉洁运营。

We require all suppliers, partners, and third-party service providers to adhere to the anti-bribery and anti-corruption standards set forth in this Policy and to strictly prohibit any form of corrupt practices in their business operations. The Company will continuously strengthen due diligence and compliance reviews of the supply chain, promoting transparency and clean operations across the entire chain.

3. 透明运营与持续改进

Transparent Operations and Continuous Improvement

本公司致力于在全球业务中贯彻公开、透明的运营机制，确保所有商业活动符合适用法律与国际规范。公司将定期评估并更新反贿赂与反腐败政策，以适应法律环境及社会期望的变化。

The Company is committed to implementing open and transparent operational mechanisms in its global business, ensuring all commercial activities comply with applicable laws and international norms. The Company will periodically evaluate and update its anti-bribery and anti-corruption policies to adapt to changes in the legal environment and societal expectations.

4. 员工保护与举报机制

Employee Protection and Reporting Mechanism

我们致力于营造诚信、廉洁、公正的工作环境，保障员工合法权益。公司严禁因员工拒绝参与任何违反商业道德或反腐败政策的行为而遭受不公正对待或报复。我们已建立独立、保密且安全的举报渠道，鼓励员工及相关方及时举报任何可疑行为，并承诺对举报信息严格保密，确保举报人免受任何形式的打击报复。

We are committed to fostering an honest, clean, and fair working environment that protects the legitimate rights and interests of employees. We strictly prohibit any form of unfair treatment or retaliation against employees who refuse to participate in activities that violate business ethics or anti-corruption policies. We have established independent, confidential, and secure reporting channels, encouraging employees and relevant parties to promptly

report any suspicious conduct. The Company commits to handling all reports with strict confidentiality and ensuring reporters are protected from any form of retaliation.

5. 培训与意识提升

Training and Awareness Raising

公司将定期为全体员工及供应链合作伙伴提供反贿赂与反腐败相关培训，增强法律意识与道德责任感，确保所有相关人员理解、认同并落实本政策要求。

The Company will provide regular anti-bribery and anti-corruption training for all employees and supply chain partners to enhance legal awareness and ethical responsibility, ensuring all relevant personnel understand, acknowledge, and implement the requirements of this Policy.

责任追究

Accountability

任何违反本政策声明的行为，都将视情节严重程度受到公司的纪律处分，并可能依法移交司法机关处理。公司保留对违规行为及相关责任人追究法律责任的权利。

Any conduct in violation of this Policy will be subject to Company disciplinary action commensurate with the severity of the circumstance and may be referred to judicial authorities in accordance with the law. The Company reserves the right to pursue legal liability against violators and relevant responsible persons.

高伟电子控股有限公司及旗下子公司将持续以负责任的商业行为推动构建公平、廉洁、可持续的商业生态。我们坚信，坚守道德高线与法律底线是实现企业可持续发展的根本保障。

Cowell e Holdings Inc. and its subsidiaries will continue to promote the development of a fair, clean, and sustainable business ecosystem through responsible business conduct. We firmly believe that upholding high ethical standards and legal compliance is the fundamental guarantee for achieving sustainable corporate development.

高伟电子控股有限公司
Cowell e Holdings Inc.

日期： 2025 年 10 月 25 日
Date: October 25, 2025