

# **Windey Energy Technology Group Co., Ltd.**

## **Compliance Policy**

To: Our Clients, Partners, and All Stakeholders,

Windey Energy Technology Group Co., Ltd. (hereinafter referred to as “we”) regards legal compliance and ethical business conduct as the cornerstone of our existence and development. We hereby solemnly declare our unwavering commitment to complying with all applicable laws and regulations and to maintaining the highest standards of business ethics. This statement outlines our core commitments in key compliance areas.

### **1. Compliance Operations**

We are committed to strict adherence to local and international laws, regulations, and regulatory requirements in all jurisdictions where we operate. We have established a robust internal compliance control system, which is regularly reviewed and updated to ensure its ongoing effectiveness. We will achieve full employee coverage of compliance training by 2030.

### **2. Anti-Corruption and Anti-Bribery**

We firmly oppose all forms of corruption and bribery. The Company strictly prohibits offering, promising, giving, or accepting any form of bribe or improper advantage to or from any government official, business partner, or third party. We are committed to conducting corruption and bribery risk assessments at all our sites by 2030.

### **3. Conflicts of Interest**

We are committed to eliminating any form of undue gain and ensuring the fairness and impartiality of all decision-making and business activities. The Company firmly upholds a zero-tolerance stance towards any conduct that may give rise to a conflict of interest. We require our employees and relevant stakeholders to proactively avoid any personal activities or relationships that could compromise, or be perceived to compromise, their objective judgment or conflict with the interests of the Company. All employees are obligated to promptly disclose any actual or potential conflicts of interest. The Company will implement rigorous assessment and control measures to ensure the objectivity and independence of business decisions, steadfastly safeguarding the best interests of the Company and its clients. We are firmly committed to achieving zero occurrences of conflict of interest behaviors.

### **4. Anti-Money Laundering and Counter-Terrorist Financing**

We solemnly commit that our business operations strictly comply with Anti-Money Laundering (AML) and Counter-Financing of Terrorism (CFT) laws and regulations of China and any other countries

where we operate. We require all employees to remain vigilant against suspicious financial activities and to adhere to fundamental principles such as “Know Your Customer” (KYC) to ensure our services are not used for illicit purposes. We are continuously improving relevant internal processes to fully fulfill our legal obligations and ensure all employees receive AML and CFT training by 2030.

## **5. Anti-Fraud**

We strictly prohibit any form of fraudulent activity, including but not limited to financial fraud, misrepresentation, record falsification, insider trading, and any deceptive acts undertaken for improper gain. The Company is dedicated to fostering an operational environment of honesty and transparency. Through the establishment of effective internal control systems, regular audits, and vigilant oversight, we actively work to prevent, detect, and deter fraud risks. Any detected and substantiated acts of fraud will be met with severe disciplinary action and legal consequences. We commit to completing anti-fraud training for all employees by 2030.

## **6. Compliance Awareness and Complaint Reporting**

We are committed to communicating the importance of compliance to our employees and require them to conduct business according to the highest ethical standards. Furthermore, we have established a confidential and anonymous reporting mechanism. We encourage employees and external third parties to report, in good faith, any suspected illegal or unethical conduct, and strictly prohibit any form of retaliation against whistleblowers.

Report Mailbox: [hegui@windeyenergy.com](mailto:hegui@windeyenergy.com)

We require all our employees, management, subsidiaries, and supply chain to adhere to the high standards set forth in this statement.