Anti Corruption Policy
The Company is committed to eradicating corruption in all aspects of the
Company's value chain to enhance anti-corruption awareness among
employees at all levels and suppliers, ensure that they conduct themselves in
accordance with professional ethics, and fulfill their responsibilities with a fair
and upright attitude.
This standard applies to all employees of the Company and all affiliated
companies, including full-time, part-time, outsourced employees, as well as
stakeholders who have business dealings with the Company and all affiliated
companies.
（The English translation of the Policy is for reference only and the Chinese
version shall prevail in case of any inconsistency between the Chinese version
and English translation thereof）
1 Bribery, communication and benefits
Bribery is strictly prohibited by the Company, and no employee is allowed to
offer, solicit or accept bribes, including soliciting or providing any benefits from
or to customers, suppliers, legislative and/or law enforcement agencies or
other personnel related to the Company’s business; or act as a third-party
intermediary to provide, solicit or accept any benefits. Anyone who solicits or
accepts benefits in any form by taking advantage of his authority, regardless

of getting permission from superior leaders, shall be deemed as violation of
the Code.
1.1 Providing benefits: under no circumstances should employees offer bribes
or illegitimate benefits to any individual or institution to seek personal gains or
Company benefits.
1.2 Soliciting benefits: employees shall not directly, indirectly or in any form,
solicit any benefits from any institution or individual related to the Company’s
business.
1.3 Accepting benefits: if an employee accepts any benefits directly or
indirectly related to the Company’s business, which hinders his objective
judgment and processing of related business, induces him to violate or harm
the interests of the Company, leads to violation of laws and regulations and
requirements of the place of listing, triggers complaints about favoritism or
misconduct, and/or makes the employee feel that is is necessary to repay the
giver in business, the employee shall not accept the benefits.
1.4 All acts related to facilitation payment are prohibited.
2 Handling conflicts of interest
2.1 Definition of conflict of interest

The common conflicts of interest include but are not limited to the following
situations:
2.1.1 Have undeclared financial interests/transactions with any suppliers,
service providers or related personnel that have business dealings with the
Company;
2.1.2 Hire service providers who are working or have worked for the Company
to work or provide services, goods, etc. for themselves and/or their immediate
family members;
2.1.3 Provide special preferential treatment to individual suppliers, service
providers, customers, job seekers, subordinates or superior leaders, etc. for
personal reasons;
2.1.4 Employees or their immediate family members (including parents,
children and spouses) are getting engaged in or consider engaging in the
things, investment or activities that have a conflict of interest with the Company
or may cause a conflict of interest;
2.1.5 Carry out external work within the Company by taking advantage of the
working hours and the Company’s assets (including human resources).
2.1.6 Provide assistance to the Company’s competitors; and

2.1.7 Privately provide or manufacture services or goods that compete with the
Company.
2.2 Declaration of conflict of interest
The employees shall avoid actual or foreseeable conflicts of interest between
individuals and the Company or that affect their judgment in performing their
duties. The employees shall report all actual or foreseeable conflicts of interest
in a timely manner.
2.2.1 If the employees realize that there is or may have a conflict of interest
with the Company, they must immediately report to their department heads in
writing.
2.2.2 If the employees fail to comply with the above requirements, severe
disciplinary punishment may be caused, including demotion, dismissal, etc.
3 Insider trading
3.1 If employees have any important information about the Company or any
other listed companies with which the Company does business and/or non-public data sensitive to stock prices, the employees shall not buy or sell the
securities of the Company or these listed companies, or disclose relevant
information to others before such data is made public.

4.4 Determine if your business has specific preventative measures in place.
5 Competing Fairly
In a free market system, competition drives efficiency and innovation, and
companies compete on a level playing field. Violations of laws that protect
competition can lead to penalties that include large fines, jail time, damaged
reputation and exclusion from government contracts. Fair competition is in
everyone’s best interest. We are committed to complying with
competition/antitrust laws wherever we operate.
All the employees should:
5.1 Please refer to this Code when interacting with competitors at all time.
5.2 Seek guidance from Legal and Compliance Department, whenever a
competition/antitrust law question arises.
5.3 Compete vigorously using public information and competitive
circumstances to your best advantage.
5.4 Remember that compliance is always in the Company’s best interest. No
one is ever authorized to violate the law.
5.5 Do not discuss with a competitor any terms on which you compete, prices,
or allocations of jobs, customers, or markets.

5.6 Do not discuss with a competitor whether or not you intend to submit a bid
or quote for any particular project or customer.
5.7 Do not talk to anyone about boycotting or refusing to deal with certain
suppliers or customers.
5.8 Do not take any action solely for the purpose of causing damaging to, or
retaliating against, a competitor.
6 Illegal and Improper Payments
The Company and all employees are not allowed to use property or other
means to bribe and sell goods. Those who secretly give kickbacks to the other
party's company or individual outside of the account shall be punished as
bribery. When selling services and goods, if discounts are required to be given
to the other party, including but not limited to commissions,tt2rother

based on the prices, services, quality, and reputation provided by the
suppliers, and in accordance with the principle of being beneficial to the
long-term business development of the company. When dealing with
suppliers, employees should always maintain fairness and should not
attempt to exert influence to obtain "special treatment" for a specific
supplier, as this can jeopardize our competitive selection process.
Employees cannot accept or demand personal benefits from suppliers
and target suppliers to prevent damaging the fairness of supplier
product and price evaluation. Employees should also keep confidential
the pricing or product information submitted by suppliers or potential
suppliers to the Company. The procurement agreement should be
appropriately approved and clearly define the services and products
provided, the calculation basis for payment, and the applicable prices
and fees. The payment amount must match the service or product
provided.
7.2 Items, discount, and gifts
For items, discount and gifts provided by suppliers during the
procurement negotiation process, they should be reflected in the
procurement contract in principle. For situations where there is no
contract or cannot be reflected in the contract, the gift should also be
considered as an asset of the Company, rather than a personal gift for
employees participating in negotiations.

7.3 Interactions with potential customers and clients
The Company is committed to meeting all customer needs, ensuring
customer satisfaction, and maintaining long-term partnerships with
customers. Employees shall not intentionally make false statements to
customers regarding the products or services of the Company or
competitors. All comparisons with competitors must be accurate, based
on publicly available information and not misleading. Employees are
not allowed to sign sub agreements or private agreements with clients
outside of written contracts. Employees shall not directly or indirectly
provide money or any other form of bribery to government officials in
order to obtain or retain customers.
8 Donations
Donations, patronage, and sponsorship may be used to conceal an
undue advantage. They may constitute, or be seen to constitute, acts of
direct or indirect corruption regardless of their monetary value. This risk
is greater when public officials have a direct or indirect connection to the
event or activity benefitting from the donation, patronage, or
sponsorship. All contributions, whether they are made in the context of
patronage, donations, or sponsorship, must go through an approval
process which becomes more rigorous as the value of the contribution
increases. Close attention must be paid to what the financing or
donations are used for, especially when the potential beneficiary of

patronage, donation, or sponsorship is or has ties to a public official,
public authority, a Politically Exposed Person (PEP), or has ties to one of
our customers.
9 Requirements for suppliers
The Company implements a "fair, open, and just" sunshine procurement
model, by increasing the proportion of open bidding, expanding the
scope of price seeking, and continuously improving procurement
transparency. All departments and affiliated companies of the Company
should send integrity notification letters or sign integrity commitment
letters and integrity contracts to relevant parties when signing contracts
with suppliers, including clauses prohibiting cooperation from providing
various benefits and conveniences to the Company staff, their relatives,
and specific related parties. At the same time, as a one vote veto system,
clean and honest employment will prevent suppliers from participating
in bidding and will be blacklisted in case of any violations.