

天工国际有限公司
商业道德规范制度
Tiangong International Company Limited
Code of Business Ethics

第一章 总则

Chapter One. General provisions

第一条 为明确天工国际有限公司（以下简称“公司”）商业活动的行为准则，确保商业行为合法、公正、诚信、可持续地进行，建立公平、透明、健康的商业环境，结合公司实际，特制定本制度。

Article 1 In order to clarify the code of conduct for the commercial activities of Tiangong International Company Limited (hereinafter referred to as "the Company"), to ensure that the commercial activities are conducted in a lawful, fair, honest and sustainable manner, and to establish a fair, transparent and healthy commercial environment, this code is hereby formulated in the light of the actual situation of the Company.

第二条 本制度适用于天工国际有限公司及其合并报表范围内的所有实体（以下统称“本集团”）。同时，本集团积极号召并支持供应商、经销商、承包商等合作伙伴共同遵守本规范。

Article 2 This code applies to Tiangong International Company Limited and all entities within the scope of its consolidated statements (hereinafter collectively referred to as "the Group"). Meanwhile, the Group actively calls for and supports suppliers, distributors, contractors and other partners to comply with this code.

第二章 商业道德规范的原则

Chapter Two. Principles of Business Ethics

第三条 诚信原则

诚信原则是商业道德规范的核心原则。诚信原则要求本集团在商业活动中保持真实、公正和透明的态度。包括在宣传、广告中提供真实准确的信息，不进行虚假宣传；在履行合同义务时严格遵守承诺，不拖欠或违约；保护客户的合法权益，不进行欺诈、虚假宣传等行为；以及遵循公平竞争原则，不进行不正当竞争。

Article 3 Principles of integrity

The principle of integrity is a core principle of the code of business ethics. The principle requires the Group to maintain a truthful, fair and transparent attitude in their business activities. This includes providing truthful and accurate information in publicity and advertisements and refraining from false propaganda; strictly abiding by commitments in fulfilling contractual obligations and refraining from default or breach of contract; protecting the legitimate rights and interests of customers and refraining from fraudulent and false propaganda and other acts; and following the principle of fair competition and refraining from unfair competition.

第四条 社会责任原则

本集团作为社会的一员，应承担起相应的社会责任。包括关注环境保护，减少对环境的负面影响，推动可持续发展等；同时，本集团还应关注社会公益事业，积极参与社区建设，为社会做出贡献。

Article 4 Principles of social responsibility

As a member of the society, the Group should assume the corresponding social responsibility. This includes paying attention to environmental protection, reducing negative impacts on the environment, and promoting sustainable

development. At the same time, the Group should also pay attention to social welfare, actively participate in community building, and contribute to society.

第五条 透明度和合规性原则

商业活动应具有透明度和合规性，确保商业行为的合法性和合规性。本集团应当公开透明的商业行为，不隐瞒或误导信息；同时，本集团还应遵守相关的法律法规，避免违法违规行为的产生。

Article 5 Principles of transparency and compliance

Business activities should be transparent and compliant to ensure the legality and compliance of business practices. Companies should be open and transparent in their business practices and not conceal or misrepresent information. At the same time, they should also comply with relevant laws and regulations to avoid illegal and illicit behavior.

第六条 公平交易原则

商业活动应遵循公平交易原则，确保交易的公正性和合理性。本集团在买卖过程中应当保持公平公正，禁止采用欺诈、胁迫等不正当手段；同时，还应尊重对方的合法权益，不进行损害对方利益的行为。

Article 6 Principle of fair trade

Commercial activities should follow the principle of fair trade and ensure the fairness and reasonableness of transactions. The Group should maintain fairness and impartiality in the process of buying and selling, and prohibit the use of fraud, coercion and other improper means. At the same time, it should also respect the legitimate rights and interests of the other party and refrain from engaging in behaviors that are detrimental to the interests of the other party.

第七条 尊重和保护利益相关方权益原则

本集团在进行商业活动时，应尊重和保护所有利益相关方的权益，包括员工、股东、消费者、供应商等。本集团应为员工提供良好的工作环境和福利待遇，保障

股东的合法权益，确保消费者的权益不受损害，以及与供应商建立公平、互利的合作关系。

Article 7 Principle of respecting and protecting the rights and interests of stakeholders

When conducting business activities, the Group shall respect and protect the rights and interests of all stakeholders, including employees, shareholders, consumers and suppliers. The Group shall provide a favorable working environment and welfare for its employees, safeguard the legitimate rights and interests of its shareholders, ensure that the rights and interests of consumers are not jeopardized, as well as establish fair and mutually beneficial cooperative relationships with its suppliers.

第三章 商业道德规范的具体内容

Chapter Three. Specific Elements of a Code of Business Ethics

第一节 维护职场健康和安全

Section I. Maintaining health and safety at work

第八条 本集团致力于为员工提供一个安全和健康的工作环境。每位员工均有义务遵守环境、安全和健康方面的行为规范，为其他员工维持一个安全和健康的工作环境，并应报告事故、伤害以及不安全的设备、操作或状况。

本集团禁止暴力和威胁行为。本集团每位员工应以安全的方式履行其职责，不酗酒、不吸毒或者服用其他违禁物品。禁止在工作场所吸食毒品或者服用其他违禁物品。

本集团保障员工取得劳动报酬、休息休假、获得劳动安全卫生保护、享受社会保险以及接受职业技能培训等各项合法权益，不得以任何形式规避履行其对员工的法定义务。

Article 8 The Group is committed to providing a safe and healthy work environment for its employees. Each employee is obligated to comply with environmental, safety and health codes of conduct, to maintain a safe and healthy work environment for other employees, and to report accidents, injuries, and unsafe equipment, operations or conditions.

The Group prohibits violent and threatening behavior. Each employee of the Group is expected to perform his or her duties in a safe manner, without the use of alcohol, drugs or other prohibited substances. The use of drugs or other prohibited substances in the workplace is prohibited.

The Group guarantees the legitimate rights and interests of employees to obtain labor remuneration, rest and vacation, labor safety and health protection, social insurance and vocational skills training, and shall not in any way circumvent the fulfillment of its legal obligations to its employees.

第二节 禁止歧视

Section II. Prohibition of discrimination

第九条 本集团反对基于员工的年龄、种族、国籍、民族、文化、宗教、婚姻情况、性取向等为由歧视任何员工。本集团保护员工在工作中不受骚扰，包括不受性骚扰、威胁、恐吓等，对存在上述行为的人员本集团将严肃处理。

本集团始终坚持为每个人提供平等的就业机会，并公平对待每位员工。每位员工的任职考核和晋升都是基于其能力和绩效。

本集团根据所在国家和地区的规定，保障女员工在孕期、产期、哺乳期内享受生育假期，严禁安排女员工在怀孕期间从事禁止从事的工作。

本集团依法保障因病或非因工负伤的员工享受医疗期和病假。

Article 9 The Group opposes to discrimination on any employee based on the employee's age, race, nationality, ethnicity, culture, religion, marital status, sexual

orientation, etc. The Group protects employees from harassment at work, including sexual harassment, threats, intimidation, etc. The Group will seriously deal with any person who engages in such behavior.

The Group always insists on providing equal employment opportunities for everyone and treating every employee fairly. Each employee's appraisal and promotion are based on his/her ability and performance.

The Group guarantees maternity leave for female employees during pregnancy, childbirth and breastfeeding in accordance with the regulations of the countries and regions in which they work, and it is strictly prohibited to arrange female employees to engage in prohibited work during pregnancy.

The Group guarantees medical treatment and sick leave for employees who suffer from illness or non-work-related injuries in accordance with the law.

第三节 禁止骚扰

Section III. Prohibition of harassment

第十条 本集团禁止任何形式的骚扰行为，包括性骚扰行为。性骚扰是指违背他人意愿，以言语、文字、图像、肢体行为等方式，对他人实施与性或者性别密切相关的不受欢迎的行为。该行为使当事人受到冒犯、胁迫、羞辱，导致了不良的心理感受或者敌意、不友好的工作环境。如果员工出现性骚扰等行为，本集团将对其进行处罚。

Article 10 The Group prohibits any form of harassment, including sexual harassment. Sexual harassment is defined as unwelcome behavior that is closely related to sex or gender, committed against the will of another person by means of speech, writing, images, physical behavior, etc. The behavior causes the person to be offended, coerced, or humiliated and results in adverse psychological feelings or a hostile or unfriendly work environment. If an employee engages in behavior such as sexual harassment, the Group will penalize him or her.

第四节 避免利益冲突

Section IV. Avoiding conflicts of interest

第十一条 员工应积极避免任何可能影响代表本集团利益行事的能力，或者可能使难以客观地、高效地履行工作职责的个人利益的发生。利益冲突会影响员工是否能够真正为本集团利益而行事，也会给本集团合作伙伴的利益带来损害。员工应在采取任何工作行动之前谨慎妥当地处理任何利益冲突情况，并按照本集团关于工作回避、利益冲突相关政策的要求，披露可能产生利益冲突的任何交易或关系，及时进行申报，按要求进行回避，避免出现实际及潜在的利益及职责冲突。

Article 11 Employees shall actively avoid the occurrence of any personal interests that may affect the ability to act on behalf of the Group's interests or that may make it difficult to carry out job duties objectively and efficiently. Conflicts of interest can affect an employee's ability to genuinely act in the interests of the Group and can also be detrimental to the interests of the Group's partners. Employees are expected to handle any conflict-of-interest situation carefully and appropriately before taking any work action, and to disclose any transaction or relationship that may give rise to a conflict of interest, declare it in a timely manner, and avoid as required by the Group's policy on work recusal and conflict of interest, in order to avoid actual and potential conflicts of interest and duty.

第五节 商业伙伴商业道德

Section V. Business ethics for business partners

第十二条 本集团应充分了解商业伙伴，并建立相适应的道德要求。本集团应当在合同中约定商业道德规范及合规条款，并要求商业伙伴予以遵守。对于违反相关条款和协议的，本集团保留追究违约责任的权利。

本集团不参与相关企业联合的非法行为，禁止同行业结盟以提高或压低材料的价格，避免欺骗客户和社会的商业行为。

Article 12 The Group shall fully understand its business partners and establish appropriate ethical requirements. The Group shall agree on business ethics and compliance terms in the contract and require business partners to comply with them. For violation of relevant terms and agreements, the Group reserves the right to pursue the responsibility of breach of contract.

The Group does not participate in illegal behavior of related business association and prohibits the alliance of the same industry in order to raise or lower the price of the material and avoids the business practice of cheating the customers and the society.

第六节 保守商业秘密

Section VI. Preservation of trade secrets

第十三条 有关本集团业务的一切信息，未经授权公开，均应视为保密信息。本集团禁止员工不当获取、披露、出卖、窃取本集团保密信息；收集与本人工作职责无关的保密信息，亦不得为非工作目的而使用该等保密信息；未经授权，对外提供本集团保密信息。

Article 13 All information related to the business of the Group shall be regarded as confidential information if it is not authorized to be disclosed. The Group prohibits employees from improperly obtaining, disclosing, selling or stealing confidential information of the Group; collecting confidential information that has nothing to do with their job duties, or using such confidential information for non-work purposes; and providing confidential information of the Group to the outside world without authorization.

第十四条 集团禁止任何员工通过盗窃、贿赂、欺诈、胁迫、电子侵入或者其他不正当手段获取他人的商业秘密，并禁止员工未经授权，披露、使用或者允许他人使用其所掌握的他人商业秘密，包括其前雇主、商业伙伴的商业秘密，或者其他不具合法来源的信息。

Article 14 The Group prohibits any employee from obtaining the trade secrets of others through theft, bribery, fraud, coercion, electronic intrusion or other improper means, and prohibits employees from disclosing, using or allowing others to use, without authorization, the trade secrets of others in their possession, including those of their former employers, business partners, or other information that does not have a legitimate source.

第十五条 本集团要求全体员工保守国家秘密。

Article 15 The Group requires all employees to keep state secrets.

第七节 保护公司资产

Section VII. Protection of corporate assets

第十六条 本集团资产是本集团发展的重要保障，每位员工都有义务保护本集团资产的安全。在持有/使用本集团资产时，要防止任何未经授权的使用、更改、破坏、浪费或其他不当行为，并仅在授权范围内使用所持有的本集团资产。本集团员工应当合理使用本集团提供的办公设备、生产工具及生产物料，不得将其用于个人用途，及时报告已经发生的，或者可疑的盗窃、损坏或滥用本集团财产的行为。本集团全体员工须严格遵守本集团资产使用规范和程序，在被授权范围内使用/持有相关资产，严禁将本集团资金或资产用于非法或不正当目的。

Article 16 The Group's assets are an important safeguard for the Group's development. Every employee is obliged to protect the safety of the Group's assets. When holding/using the Group's assets, they shall prevent any unauthorized use, alteration, destruction, waste or other misconduct, and use the Group's assets held only within the authorized scope. Employees of the Group shall use office equipment, production tools and production materials provided by the Group in a reasonable manner and shall not use them for personal purposes. They shall promptly report any occurred or suspected theft, damage or misuse of Group property. All employees of the Group shall strictly abide by the norms and procedures for the use of the Group's assets, use/hold the relevant assets within

the authorized scope, and strictly prohibit the use of the Group's funds or assets for illegal or improper purposes.

第八节 知识产权

Section VIII. Intellectual property rights

第十七条 本集团知识产权包括专利、商标、版权、商业秘密和其他信息。每位员工应遵守本集团知识产权和信息安全的相关政策，保护和合法使用本集团的知识产权。员工在本集团工作期间为履行工作职责，或者主要是利用集团资产和资源所形成的发明、创作、计算机软件、技术或商业秘密均属于本集团所有。

Article 17 The Group's intellectual property rights include patents, trademarks, copyrights, trade secrets and other information. Each employee shall comply with the Group's policies related to intellectual property and information security and protect and legally use the Group's intellectual property. The inventions, creations, computer software, technologies or trade secrets formed during the employees' working period in the Group for the purpose of performing their job duties, or mainly by utilizing the Group's assets and resources belong to the Group.

第十八条 参与或介入任何开放源代码软件活动的行为可能导致本集团知识产权不恰当的转让、转移或者公开。因此，每位员工应遵守开源软件使用的要求。

Article 18 Participation or involvement in any open-source software activities may result in improper assignment, transfer or disclosure of the Group's intellectual property rights. Therefore, each employee shall comply with the requirements for the use of open-source software.

第九节 保护公司声誉

Section IX. Protection of corporate reputation

第十九条 员工是本集团形象的代表，在对外活动中应重视自身的言行举止，充分尊重合作伙伴及其员工，尊重并服务消费者。在私人活动中，也应充分认识到

员工的身份，在参加私人社交活动或者在私人社交媒体发表言论时，仍需考量自身言论对本集团声誉的影响。

未经授权，本集团员工严禁代表公司参加公开宣传活动，如接受采访，出席行业展会、论坛与峰会等公开活动，或进行不实的信息披露，使用个人社交媒体发布、转发与公司品牌形象不符或者有损公司声誉的不当言论等。

Article 19 The employees are the representatives of the Group's image and should pay attention to their own words and behavior in external activities, fully respect the partners and their employees, and respect and serve the consumers. In private activities, they should also fully recognize the status of the Group's employees, and when participating in private social activities or making comments in private social media, they still need to consider the impact of their own comments on the Group's reputation.

Employees are strictly prohibited from participating in public promotional activities, such as accepting interviews, attending public events such as industry exhibitions, forums and summits, on behalf of the Group without authorization; or making inaccurate disclosure of information, using personal social media to post or retweet inappropriate comments that are inconsistent with the Company's brand image or damaging to the Company's reputation.

第十节 保护用户隐私

Section X. Protection of user privacy

第二十条 本集团通过恰当的安全措施保护员工、客户和其他人员的个人信息。本集团要求每位可以接触到个人信息的人员必须保护该等信息免遭不当或未经授权的使用或者披露，遵守关于处理该等信息所有适用的本集团政策和安全性通信协议，以及适用于日常工作的隐私和数据保护法。

Article 20 The Group protects the personal information of employees, customers and other persons through appropriate security measures. The Group

requires each person who has access to personal information to protect such information from improper or unauthorized use or disclosure, and to comply with all applicable Group policies and secure communication protocols regarding the handling of such information, as well as privacy and data protection laws that apply to their daily work.

第十一节 保护第三方商业秘密

Section XI. Protection of third-party trade secrets

第二十一条 尊重与保护他人商业秘密是本集团基本的商业准则，本集团员工须严格按照法律规定和合作伙伴的要求获取、使用、存放、处置合作伙伴的商业秘密，并在日常工作中遵守以下指引：

- 1) 不得以不正当手段获取他人的商业秘密；
- 2) 不得在未经许可的情况下，披露、使用或者允许第三方使用他人的商业秘密；
- 3) 对于合法获取的商业秘密，要以妥善的方式进行管理和存储；
- 4) 严格遵守所签署的保密协议的约定，禁止滥用他人商业秘密

Article 21 Respecting and protecting other people's commercial secrets is the Group's basic commercial guidelines. The Group's employees shall acquire, use, store and dispose of the partner's commercial secrets in strict accordance with the provisions of the law and the partner's requirements, and shall comply with the following guidelines in their daily work:

- (1) The trade secrets of others shall not be obtained by improper means;
- (2) Not to disclose, use or allow a third party to use another person's trade secrets without authorization;
- (3) Legally acquired trade secrets should be managed and stored in a proper manner;

(4) Strictly abide by the signed confidentiality agreement and prohibit the abuse of other people's commercial secrets.

第十二节 禁止内幕交易

Section XII. Prohibition of inside trading

第二十二条 内幕信息是指涉及公司的经营、财务、人事或者对公司的发展和价值或上市公司证券的市场供求有重大影响的尚未公开的信息。本集团禁止任何基于内幕信息进行的股票或证券买卖。每位员工因履行自身岗位职责而知悉前述信息时，都应对该等信息承担保密义务，并且不得利用该等信息获取不当利益。拥有内幕信息的员工，应当严格遵照中国刑法、证券法以及所在国家和地区相关法律法规的规定，严格遵守内部规章制度的规定，不得从事以下行为：

- 1) 利用内幕信息进行交易。包括内幕人以本人名义，直接或委托他人进行交易，或者以他人名义进行交易，或者为他人进行交易。
- 2) 泄露内幕信息。即知悉内幕信息的知情人员将内幕信息告诉或传播给第三人，使其利用内幕信息进行交易或者转告给他人的行为。
- 3) 内幕人利用内幕信息建议他人买卖证券。指知悉内幕信息的知情人员在内幕信息的基础上，向第三人提供咨询或者推荐意见，使其进行交易的行为。

Article 22 Inside information refers to information that has not yet been disclosed that involves the Company's operations, finances, personnel or that has a significant impact on the Company's development and value or the market supply and demand of the securities of a listed company. The Group prohibits any trading of stocks or securities based on inside information. Each employee who becomes aware of the foregoing information as a result of performing his/her job duties shall be obligated to maintain confidentiality of such information and shall not utilize such information to obtain improper benefits. Employees in possession of inside information shall strictly comply with the provisions of the Criminal Law of the PRC, the Securities Law and the relevant laws and regulations of the countries

and regions in which they are located, as well as the provisions of the internal rules and regulations, and shall not engage in the following behaviors:

1) Trading with inside information. This includes trading by an insider in his or her own name, directly or on behalf of another person, or trading in another person's name, or trading for another person.

2) Leakage of inside information. That is, the person who knows the inside information tells or disseminates the inside information to a third person, so that he or she can use the inside information to carry out transactions or pass it on to others.

3) An insider who utilizes inside information to advise another person to buy or sell securities. This refers to the act of providing advice or recommendation to a third party to trade on the basis of inside information by a person with knowledge of the inside information.

第十三节 反对贿赂和腐败

Section XIII. Combating bribery and corruption

第二十三条 本集团禁止一切形式的腐败与贿赂行为，董事会将对反贪腐负最高管理职责。本集团员工应遵守适用于本集团的中国及其他司法管辖地区的反贿赂及反腐败法律，对贿赂和腐败行为持“零容忍”态度，杜绝任何形式的贿赂与腐败。

本集团对员工日常业务往来中所收受的礼品进行统一管理与安排。在任何情况下，员工不得向任何与工作业务相关的单位和个人索要礼品，不得决议、授意、同意违规收受礼品。员工可以提供与其工作相关的恰当、合法的商务礼品和款待，但前提是该礼品和款待涉及的价值在正常范围内，而且不会被视为或有合理理由被怀疑为影响接受方的决策或者判断。本集团禁止以谋求特殊待遇，企图获取不当利益回报为目的而赠送礼品或提供款待。

对于违反本集团反腐败要求的行为，本集团将根据违规情节严重程度，采取对应处分措施，严重违规情况将解除劳动合同，并移送司法机关追究法律责任。同时，

发生违规事件后，本集团将针对暴露出的问题开展专项整改，避免同类问题重复发生。

Article 23 The Group prohibits all forms of corruption and bribery, and the Board of Directors assumes the ultimate management responsibility for anti-corruption and anti-bribery. Employees of the Group shall comply with the anti-bribery and anti-corruption laws of China and other jurisdictions applicable to the Group and take a "zero-tolerance" attitude towards bribery and corruption and eliminate any form of bribery and corruption.

The Group conducts unified management and arrangement of gifts received by employees in their daily business interactions. Under no circumstances shall employees demand gifts from any work-related entities or individuals, nor shall they decide, instigate, or consent to the illegal acceptance of gifts. Employees may provide appropriate and legal business gifts and hospitality related to their work, provided that the value involved in such gifts and hospitality is within a reasonable range and will not be deemed or reasonably suspected of influencing the decision-making or judgment of the recipient. The Group prohibits the giving of gifts or provision of hospitality for the purpose of seeking special treatment or attempting to obtain improper benefits in return.

For any violation of the Group's anti-corruption requirements, the Group will impose corresponding disciplinary measures based on the severity of the violation. In case of serious violations, the labor contract will be terminated, and the violator will be transferred to the judicial authority to be held legally responsible. Meanwhile, after the occurrence of a violation incident, the Group will carry out targeted rectification on the exposed problems to prevent the recurrence of similar issues.

第十四节 遵守出口管制法规

Section XIV. Compliance with export control legislation

第二十四条 出口管制是指一国政府通过建立一系列审查、限制和控制机制，以直接或间接的方式防止本国限定的商品或技术通过各种途径流通或扩散至目标国家，从而保护本国的安全、外交和经济利益的行为。

本集团承诺遵守适用于国内和国际贸易的出口管制法律和海关条例，并根据实际情况，有针对性地建立出口管制和贸易制裁相关的完整有效的合规管理体系，减少违规风险或被处罚风险。

Article 24 Export control refers to the act of a government to protect its security, diplomatic and economic interests by establishing a series of review, restriction and control mechanisms to prevent, directly or indirectly, the circulation or diffusion of locally restricted commodities or technologies to the target country through various means.

The Group is committed to complying with export control laws and customs regulations applicable to both domestic and international trade, and to establishing, based on the actual situation, a complete and effective compliance management system related to export controls and trade sanctions in a targeted manner to reduce the risk of non-compliance or the risk of penalties.

第十五节 遵守反垄断法规

Section XV Compliance with anti-monopoly laws and regulations

第二十五条 本集团提倡自由、公平的竞争，反对任何排除、限制竞争或不正当竞争的行为。本集团应当在经营活动中遵守公平竞争原则，遵守反垄断法及各国反托拉斯法的规定，在法律框架内进行良性竞争，自觉避免垄断行为的发生。

Article 25 The Group advocates free and fair competition and opposes any behavior that excludes or restricts competition or unfair competition. The Group shall abide by the principle of fair competition in its business activities, comply with the provisions of the anti-monopoly law and the antitrust laws of various

countries, engage in healthy competition within the legal framework, and consciously avoid monopolistic behavior.

第十六节 遵守反洗钱法规

Section XVI. Compliance with anti-money-laundering legislation

第二十六条 本集团严格遵守所有适用的金融制裁、反洗钱、反恐融资法律法规和国际组织决议，承诺开展业务时与资金来源合法且声誉良好的商业伙伴进行经营来往。

本集团严格禁止将平台、产品和服务用于洗钱或资助恐怖主义目的

Article 26 The Group strictly complies with all applicable financial sanctions, anti-money-laundering and counter-terrorism financing laws and regulations, and resolutions of international organizations, and undertakes to conduct its business with business partners with legitimate sources of funds and good reputation.

The Group strictly prohibits the use of its platform, products and services for money laundering or terrorist financing purposes.

第十七节 坚持公平交易

Section XVII. Upholding fair trade

第二十七条 本集团员工应尊敬客户、供应商、竞争对手和员工的合法权益，并与之公平交易，通过提高产品质量、服务水平等方式赢得市场份额，不得通过操纵、隐瞒、滥用特权信息、错误陈述重大事实或任何其他不公平交易行为获取不公平的优势。

Article 27 Employees of the Group shall respect the legitimate rights and interests of customers, suppliers, competitors and employees, and shall deal fairly with them. Market share shall be acquired by improving product quality and service level, and shall not obtain unfair advantage through manipulation,

concealment, misuse of privileged information, misrepresentation of material facts, or any other unfair trade practices.

第十八节 财务报告义务

Section XVIII. Financial reporting obligations

第二十八条 所有员工必须严格地遵守所有关于业务交易、评估及预测的会计和财务报告可适用的标准、法律、法规和政策。编制财务会计报告，应当根据真实的交易、事项以及完整、准确的账簿记录等资料，并按照所适用的会计制度规定的编制基础、编制依据、编制原则和方法，做到数字真实、计算准确、内容完整、说明清楚。本集团的高级财务管理人员和财务部门的其他员工应确保所披露的财务信息的完整、公平、准确、及时和可理解性。

Article 28 All employees must strictly comply with all applicable standards, laws, regulations and policies on accounting and financial reporting of business transactions, assessments and forecasts. The Group shall prepare financial and accounting reports based on true transactions and matters as well as complete and accurate bookkeeping records and other information, and in accordance with the fundamentals of preparation, the basis of preparation, the principles and methods of preparation stipulated by the applicable accounting system, so as to ensure that the figures are true, the calculations are accurate, the contents are complete, and the explanations are clear. The Group's senior financial management and other employees of the finance department shall ensure the completeness, fairness, accuracy, timeliness and understandability of the financial information disclosed by the Group.

第十九节 社会责任义务

Section XIX. Social responsibility obligations

第二十九条 本集团在创造利润、对股东和员工承担责任时，也承担对社会的责任。本集团始终强调在经营发展的同时，积极回馈社会，具体行为包括但不限于发展和支持慈善事业，开展赞助捐赠等。本集团禁止开展政治捐赠。

Article 29 When the Group creates profits and assumes responsibility to shareholders and employees, it also assumes responsibility to society. The Group always emphasizes on actively contributing to the society while operating and developing, and specific behaviors include but are not limited to developing and supporting charitable causes and carrying out sponsorship donations. The Group prohibits political donations.

第三十条 捐赠的款物必须用于开展符合慈善救助用途的社会救助活动和公益事业。相关慈善款物的使用情况应随时接受利益相关方的查询和监督，捐赠资金严格按照规定实行核算，以防范和杜绝慈善捐赠过程中出现腐败和贿赂行为。

Article 30 The donated funds must be used to carry out social assistance activities and public welfare undertakings in line with the purpose of charitable assistance. The use of relevant charitable funds shall be subject to inquiry and supervision by interested parties at any time, and the donated funds shall be accounted for in strict accordance with the regulations, so as to prevent and eliminate corruption and bribery in the process of charitable donations.

第三十一条 本集团严格遵守中国及相关国家环保法律法规，树立环保合规管理意识，积极履行环境保护义务，落实遵守环境保护法律法规的主体责任，及时采取有效措施防止污染和危害。

Article 31 The Group strictly complies with the environmental protection laws and regulations of China and relevant countries, establishes the awareness of environmental protection compliance management, actively fulfills the obligations of environmental protection, implements the main responsibility of complying with the environmental protection laws and regulations, and takes timely and effective measures to prevent pollution and hazards.

第三十二条 本集团在进行工程建设或改造项目时，严格依照相关政策及监管要求进行环境影响评价，防止污染环境和破坏生态。

Article 32 The Group shall conduct environmental impact assessment in strict accordance with relevant policies and regulatory requirements when carrying out engineering construction or renovation projects to prevent pollution of the environment and damage to the ecology.

第四章 商业道德规范的监督

Chapter Four. Monitoring of the Code of Business Ethics

第三十三条 本集团内部监督机构负责监督商业道德规范的执行情况，定期审查和评估本集团的商业活动，及时发现本集团可能存在的商业道德风险和问题，提出改进建议，并检查整改情况，确保商业活动符合道德规范的要求。

Article 33 The internal oversight body of the Group is responsible for supervising the implementation of the Code of Business Ethics, reviewing and evaluating the Group's business activities on a regular basis, identifying possible business ethics risks and problems in the Group in a timely manner, proposing recommendations for improvement, and checking the status of rectification, so as to ensure that the business activities are in line with the requirements of the Code of Business Ethics.

第三十四条 本集团还应建立商业道德举报机制，鼓励员工和其他利益相关者积极举报违反商业道德规范的行为。

Article 34 The Group shall also establish a business ethics reporting mechanism to encourage employees and other stakeholders to actively report violations of business ethics.

第三十五条 本集团定期提供针对全体员工的商业道德规范内容培训，以增强员工的商业道德意识。同时，本集团还倡导供应商、合作伙伴等其他利益相关方积极开展商业道德培训，并鼓励和支持其建立有效的商业道德规范和执行机制。

Article 35 The Group provides regular training on the content of business ethics for all employees to enhance their awareness of business ethics. Meanwhile, the Group also advocates other stakeholders such as suppliers and partners to actively conduct business ethics training and encourages and supports them to establish effective business ethics and enforcement mechanisms.

第五章 商业道德规范的惩罚

Chapter Five. Penalties on Business Ethics

第三十六条 对于违反商业道德规范的员工，本集团应采取相应的内部处罚措施。处罚措施包括口头警告、书面警告、降职、解雇等，具体取决于违规行为的性质和严重程度。通过内部处罚，本集团可以向员工传达对商业道德规范的重视，并警示其他员工不要效仿该违规行为。

Article 36 The Group shall take appropriate internal punishment measures against employees who violate the Code of Business Ethics. Punishment measures may include verbal warning, written warning, demotion, dismissal, etc., depending on the nature and severity of the violation. By imposing internal penalties, the Group can convey to its employees the importance of the Code of Business Ethics and warn other employees not to follow the example of the offending behavior.

第三十七条 若本集团违反商业道德规范，相关部门可能会处以经济处罚，如罚款、没收违法所得等；若本集团发生涉嫌违法犯罪的商业道德违规行为，如欺诈、行贿、偷税漏税等，本集团及涉事员工可能面临法律追究。

Article 37 If the Group violates the Code of business ethics, the relevant authorities may impose financial penalties, such as fines, confiscation of illegal

income, etc. If the Group engages in business ethics violations suspected of illegal or criminal activities, such as fraud, bribery, tax evasion, etc., the Group and the employees involved may face legal action.

第六章 附则

Chapter Six. Bylaws

第三十八条 本制度由公司内审部负责解释、修订。

Article 38 This Code shall be interpreted and revised by the Company's Internal Audit Department.

第三十九条 本制度由本集团高级管理层审议批准。本集团高级管理层对本制度的执行、监督及定期检讨承担整体责任，并负责对本制度的修订提供指导。本集团相关职能部门根据职责分工负责本制度的具体落实、解释及日常管理；

Article 39 This Code has been reviewed and approved by the Group's senior management. The Group's senior management assume overall responsibility for the implementation, supervision and regular review of this Code, and be responsible for providing guidance on the revision of this Code. The relevant functional departments of the Group shall be responsible for the specific implementation, interpretation and daily management of this Code in accordance with the division of responsibilities.

第四十条 本制度自发布之日起执行。

Article 40 This Code of business conduct shall be implemented as of the date of its issuance.