Code of Business Conduct

1.1.2 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.
1.1.3 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 necessary to repay the giver in business,
the employee shall not accept the benefits.
1.1.4 All acts related to facilitation payment are prohibited.
1.2 Handling conflicts of interest
The common conflicts of interest include but are not limited to the following situations:
1.2.1.1 Have undeclared financial interests/transactions with any suppliers, service providers
or related personnel that have business dealings with the Company;
1.2.1.2 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;
1.2.1.3 Provide special preferential treatment to individual suppliers, service providers,
customers, job seekers, subordinates or superior leaders, etc. for personal reasons;
1.2.1.4 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;
1.2.1.5 Carry out external work within the Company by taking advantage of the working hours
and the Company’s assets (including human resources).
1.2.1.6 Provide assistance to the Company’s competitors; and
1.2.1.7 Privately provide or manufacture services or goods that compete with the Company.
1.2.2 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.
1.2.2.1 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.
1.2.2.2 If the employees fail to comply with the above requirements, severe disciplinary
punishment may be caused, including demotion, dismissal, etc.
1.3 Insider trading
1.3.1 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.
1.3.2 The employees shall abide by all laws and regulations regarding insider trading. Any
employee involved in insider trading will be punished according to relevant rules of the
Company, or even dismissed. Meanwhile, the Company will also report to relevant law
enforcement agencies.
1.4 Preventing Money Laundering
Money laundering is using otherwise lawful business transactions as a way to hide the source
of money that has been obtained illegally. Money laundering typically involves payments in
the form of cash or money order. Suspicious activity includes: large cash transactions as well
as customers who are reluctant to provide verifiable information.
We comply with applicable laws and regulations relating to money laundering. We do not
condone, support or facilitate money laundering activities. All the employees should:
1.4.1 Watch out for irregularities in the way payments are made.
1.4.2 If you have concerns about a payment, request an alternative form be used and report the
concern to your manager.

1.4.3 If the transaction seems suspicious, report it to related discipline inspection authorities
even if you do not move forward with the transaction.
1.5 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.
We are committed to complying with competition/antitrust laws wherever we operate, so as to
uphold a level playing field in the market.
All the employees should:
1.5.1 When interacting with competitors always refer to the Code.
1.5.2 Seek guidance from the Enterprise Management and Compliance Department whenever
a competition/antitrust law question arises.
1.5.3 Compete vigorously, using public information and competitive circumstances to your best
advantage.
1.5.4 Remember that compliance is always in the Company’s best interest. No one is ever
authorized to violate the law.
1.5.5 Do not discuss with a competitor any terms on which you compete, prices, or allocations
of jobs, customers, or markets.
1.5.6 Do not discuss with a competitor whether or not you intend to submit a bid or quote for
any particular project or customer.
1.5.7 Do not talk to anyone about boycotting or refusing to deal with a supplier or customer.
1.5.8 Do not take any action just to hurt or retaliate against a competitor.
1.6 Use of IT facilities and services
1.6.1 IT facilities and services of the Company are available for the employees to use when
performing their duties. The Company has formulated information security policies, as well as

series of rules and regulations to guarantee information security and integrity. The employees
shall follow these policies, rules and regulations when using IT facilities and services.
1.6.2 The IT Department will monitor the use of these facilities and services without infringing
on the privacy of employees to ensure that employees comply with the rules and regulations on
IT, and the violators will be punished.
1.6.3 Emails of the Company are used for Company management purposes. The employees
shall use the service appropriately according to the national laws and regulations, as well as
social ethics and good customs. The employees shall not send emails that are defamatory,
harassing, pornographic, discriminatory, obscene, derogatory, teasing, fraudulent, inciting, or
other offensive emails.
1.6.4 The employees shall use the Internet facilities provided by the Company in a lawful,
appropriate, and ethical manner. The employees shall use these facilities properly according to
the national laws and regulations, as well as social ethics and good customs, and shall not
participate in online games, download offensive or obscene materials, illegal software, free

1.7.3 Data related to and provided by external personnel that the Company has or will do
business with, such as customers, service providers, suppliers, partners or any other personnel,
etc., are included.
1.7.4 All employees authorized to access or manage any data of the Company must take
adequate protection measures for relevant data to prevent accidental public disclosure, abuse or
misuse of any relevant data. Examples of improper use of data include disclosure of data in
exchange for money or other rewards, use of data for private gain or purpose, disclosure of data
to harm the interests of the Company, or for any other purposes that endanger or damage the
interests and reputation of the Company or its employees.
2. Protection of Employees’ rights
Our employees are our most valuable asset. We are concerned about their welfare, respect their
personal traits and build mutual trust. Caring for each other is not only helpful to personal and
professional development of the employees, but also helpful to the growth of the Company and
its profitability.
2.1 Employee privacy
We respect the privacy of employees. The personal information of employees is protected and
kept strictly confidential. We will avoid collecting unnecessary personal information.
Meanwhile, we will also comply with relevant regulations on personal information (privacy)
when collecting and using the personal information of employees.
2.2 Equal opportunities
The Company actively advocates equal opportunities and prohibits all kinds of discrimination,
and provides equal opportunities for employee recruitment, training, promotion, transfer, salary,
benefits, termination of contract, etc. These opportunities are not affected by such factors as
age, gender, pregnancy, physical health or mental status, marital status, family status, race, skin
color, nationality, religion, political affiliation, sexual orientation, etc. In addition, we will
praise and reward employees based on their contributions, performance and technical ability.
We provide salary and training opportunities to all employees by taking their position, personal

ability and performance as the objective criteria. In addition, we will not tolerate any form of
discrimination, harassment, defamation and acts against others (discrimination that causes harm
to others) in the workplace.
2.3 Health and safety
We comply with all relevant occupational health and safety regulations, formulate occupational
health and safety policies that cover all full-time, part-time, outsourced, and contractor
employees of the Company, and are committed to providing employees with a safe and healthy
working environment, comprehensively ensuring their health and safety. The Company's Safety,
Environment, and Equipment Department has formulated safety production related rules and
regulations, and all employees have corresponding responsibilities and obligations to protect
their own and all relevant personnel's occupational health and safety.
3 Protection of Environment
Working to meet high environmental standards, actively addressing climate change and
continuously improving processes all promote environmental sustainability. Our
Environmental Policy demonstrates our commitment to implementing best practices
concerning environmental issues and outlines improvements we are making across our
organization. It covers environmental compliance, communications, climate change, emission
reduction, resource use, recycling and biodiversity.
All the employees should:
3.1 Comply with environmental laws and regulations applicable to your work.
3.2 Participate in relevant training programmes.
3.3 Report any concerns of non-compliance with environmental laws or regulations.
3.4 Read the Environmental Policy Statement of the Company.
4 Follow the code of conduct

All employees shall have the responsibility to understand and abide by this code of conduct,
and are also obliged to report violations of the Code according to the procedures. Anyone who
violates the Code will be subject to disciplinary punishment.
4.1 Training and implementation of the Code
The head of each unit shall guide his subordinates to understand and apply the principles and
requirements of this Code. To ensure that employees comply with and implement this Code,
they shall be trained on this Code at the time of entry. If employees have problems with the
implementation, or has any opinions or suggestions, they shall communicate them to relevant
departments for follow-up action.
4.2 Reporting and investigation of violations of the Code
The Company expects and encourages employees and those who do business with the Company
(for example, customers, suppliers, creditors and debtors) to report to the Company any
misconduct that may occur with respect to financial reporting, internal monitoring or other
matters, any actual or suspected breach of the Code, and any improper or illegal conduct
associated with the Company.
4.2.1 Reporting
4.2.1.1 Where any report or accusation is received alleging that cadres and staff have violated
requirements for exercising power impartially, conducting work with integrity and observing
business ethics, and are suspected of offences including embezzlement and bribery, abuse of
power, dereliction of duty, rent‑seeking, transfer of interests, and fraud for personal gain,
written or oral reports together with relevant materials may be submitted to the specialized
department responsible for anti‑corruption work (General Office of the Commission for
Discipline Inspection).
4.2.1.2 Each reporting will be kept confidential. Without the consent of the whistle-blower, his
identity shall not be disclosed, unless required by applicable laws and regulations, or required
by any order or instructions of the court that has jurisdiction over the Company.

4.2.1.3 We will do our best to protect the whistleblower and the information received. If the
reporting employee provides real reasons and exact information, the employee shall not be
discriminated or retaliated or harmed even if the reporting is finally turned out to be incorrect
or unfounded. Harassment, discrimination, retaliation and harm to the whistleblower will be
regarded as serious misconduct, which may lead to dismissal if confirmed. Please refer to the
Rules for the Work of Discipline Inspection and Supervision Organ Offices regarding the
Procedures for Accusations and Charges for details.
4.2.1.4 However, if the whistleblower makes false reports maliciously because of ulterior
motives or for personal gain, the Company shall reserve the right to take appropriate actions
against relevant persons including the whistleblower; internal employees will be subject to
disciplinary punishment according to relevant regulations of the Company.
4.2.2 Investigation
4.2.2.1 The investigation team composed of the General Office of the Commission for
Discipline Inspection and relevant teams shall conduct fair and effective investigation to any
report received. The investigation is designed to assess whether the reported matter is a de facto
violation the internal rules and regulations and/or codes of conduct.
4.2.2.2 The investigation team shall issue an investigation report based on the facts verified
after completing necessary procedures.
4.2.2.3 During investigation, the employee under investigation may be suspended from his/her
job.
4.3 Penalties for violation of the code of conduct
4.3.1 We will not tolerate any violation of the code of conduct. Any employee who is found to
be in direct or indirect violation of the Code will be subject to disciplinary punishment,
including dismissal.
4.3.2 In the case of suspected corruption or other forms of illegal behaviors that are detrimental
to the Company, it will be submitted to the judicial organs for processing after approval by the
Company.

4.4 Revision and update of the Code
At least every three years or as needed, the Company checks whether the content of the
guidelines is applicable or needs to be updated, and revises, improves, and enhances the
guidelines based on actual situations, while publishing them to employees on the company's
internal or official website.