

诚信合规手册
Integrity Compliance Manual

中国一冶集团有限公司
China First Metallurgical Group Co., Ltd.

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董事长致辞

Speech by the Chairman

中国一冶集团有限公司（下称“公司”或“我们”）是世界 500 强企业中国五矿集团有限公司和上市公司中国冶金科工股份有限公司（股票代码：601618）的重要骨干子企业，是集工程施工总承包、房地产开发、钢材深加工为一身的现代化大型综合企业。公司始终秉持“客户为源、诚信为先、员工为本、进取为魂”的核心价值观，以“质量、工期、服务”为宗旨，坚持“诚信守法，满足客户需求；持续改进、打造精品工程；预防污染、保障安全健康”的管理方针，认真、积极履行合同服务承诺，竭诚为国内外客户提供一流的工程和技术服务。

China First Metallurgical Group Co., Ltd. (hereinafter referred to as "the Company" or "we"), as an important backbone subsidiary of China Minmetals Corporation, a Fortune 500 enterprise, and Metallurgical Corporation of China Ltd. (stock code: 601618), is a modern large-sized comprehensive enterprise incorporating general contracting of project construction, real estate development, and equipment fabrication into itself. The Company always adheres to the core value of "customer as the source, faithfulness with the priority, employees first and aggressiveness as the soul", regards "quality, period and service" as its aim, fulfills strictly the management policy of "abiding by law in good faith, satisfying the requirement of customers; sustainable improvement, and create fine projects, prevent pollution and guarantees safety and health, earnestly and actively fulfill the contract service commitment, and sincerely provide clients at home and abroad with first-class engineering technical services.

我们清醒地认识到：诚信合规对于企业和员工是最宝贵的资源，是赢得信赖的基础，也是赢得广大市场“通行证”的保证。我们强化诚信与合规责任，旨在提升企业软实力，助力企业安全、稳定、持续发展。我们要坚持诚信合规高于经济效益的理念，构建“全员、全业务领域、全过程”的诚信合规管理体系，增强全体员工的诚信合规意识，将诚信合规管理融入我们的经营、管理、业务和工作，对于各类违规违纪行为做到“零容忍”，严肃惩处。

We are keenly aware that integrity compliance is the most precious resource for enterprises and employees, the foundation for winning trust, and the guarantee for gaining the "pass" of the vast market. We should strengthen our integrity and compliance responsibilities, to enhance the soft power of the Company and to achieve safe, stable and continuous development. We should adhere to the concept that integrity compliance is higher than economic benefits, build an integrity compliance management system for "all employees, all business areas and the whole process", enhance the integrity compliance awareness of all employees, integrate integrity compliance management into our operation, management, business and work, and take "zero tolerance" attitude and adopt punitive measures against all kinds of violations.

《诚信合规手册》为全体员工提供了处理内部事务与对外交易交往的基本行为准则，我们要求公司的每一位员工必须严格遵守。诚信合规人人有责，让我们用实际行动，完成“铸造精品工程、拓展幸福空间”的使命。

The Integrity Compliance Manual provides all employees with the basic code of conduct for handling internal affairs and external transactions, and we require every employee of the Company to strictly abide by the Manual. Every one of us has an obligation to maintain integrity compliance. Let's take practical actions to complete the mission of "casting excellent quality projects and expanding happiness space".

中国一冶集团有限公司董事长：宋占江
Chairman of China First Metallurgical Group Co., Ltd.: Song Zhanjiang

使用说明

Instructions for Use

制定《诚信合规手册》的目的

purpose of developing the Integrity Compliance Manual

制定公司统一的诚信合规行为准则，以“合规从高层做起、全员主动合规、合规创造价值”为理念，以规范企业和员工的行为为内涵，以守住不发生重大合规风险的底线、塑造合规软实力和合规竞争力为目标，维护公司良好声誉，确保公司安全、稳定、持续发展。

It aims to help the Company develop a unified code of conduct for integrity compliance, with "top management setting themselves as example for compliance, all employees actively maintaining compliance, and creating value through compliance" as idea, with regulating the behavior of the Company and employees as intention, with holding the bottom line of no major compliance risks and shaping the soft power of compliance and compliance competitiveness as target, to maintain the good reputation of the Company, and to ensure the safe, stable and sustainable development of the Company.

《诚信合规手册》的适用范围

Scope of application of the Integrity Compliance Manual

本手册适用于公司的全体员工、代表（代理）以及以公司名义从事各项工作的人员。

This Manual is applicable to all employees, representatives (agents) and personnel engaged in various tasks in the name of the Company.

公司的全资及控股子公司、附属分公司亦应执行本手册。公司建议参股公司参照执行本手册。同时，公司鼓励商业伙伴的行为与本手册一致。

Wholly owned and controlled subsidiaries and affiliated subsidiaries of the Company shall also implement this manual. The Company suggests the equity participating companies refer to this Manual for the implementation of relevant regulations. At the same time, the Company encourages business partners to behave in consistent with this Manual.

《诚信合规手册》的使用

Use of the Integrity Compliance Manual

本手册规定了公司员工应遵守的基本诚信合规行为准则。此外，公司员工还应遵守公司其他的规章制度，这些规章制度可以在“OA”系统的管理制度栏查阅，也可以向上级领导或相关部门（法律部）寻求帮助。

This Manual specifies the basic integrity compliance codes of conduct that employees of the Company should abide by. In addition, employees should abide by other rules and regulations of the Company, which can be consulted in the management system column of "OA" system, or seek help from superior leaders or relevant departments (Legal Department).

《诚信合规手册》的执行

Implementation of the Integrity Compliance Manual

全体员工应认真学习本手册，深入理解诚信合规的基本准则和要求，并承诺遵守本手册。

All employees should carefully study this manual, deeply understand the basic principles and requirements of integrity compliance, and promise to abide by this manual.

各级领导干部要以身作则，积极营造诚信合规氛围，指导并监督属下员工遵守本手册。

Leading cadres at all levels should lead by example, actively create an atmosphere of integrity compliance, and guide and supervise their subordinates to abide by this Manual.

违反《诚信合规手册》的处罚

Penalties for violating the Integrity Compliance Manual

对违反本手册有关规定的员工，将根据公司相关规定（如《员工违纪与违规处理办法》）给予纪律处分和违规问责，直至解除劳动合同。涉嫌犯罪的，移送司法机关。

Employees who violate the relevant provisions of this Manual will be given disciplinary sanctions and shall be held accountable for violations according to the relevant regulations of the Company (such as the Measures for Handling Employees' Violations of Disciplines and Rules) until the termination of the labor contract. Any employee suspected of committing crimes shall be transferred to judicial organs.

《诚信合规手册》的修订

Revision of the Integrity Compliance Manual

公司将根据需要对本手册进行修订或补充，最新版的手册会及时向员工发布。每一位收到手册的员工应签收确认。

The Company will revise or supplement this Manual as needed, and the latest version of the Manual will be released to employees in time. Every employee who receives the Manual should sign for confirmation.

1、诚信合规基本要求

1. Basic Requirements for Integrity Compliance

诚信合规经营是企业安全、稳定、持续发展的基石。我们的一言一行都与公司的声誉和利益息息相关。每一位员工都要做到：守法合规、诚信正直，为实现“百年一治，基业常青”的美好愿景夯实基础。

Honesty and compliance management is the cornerstone of safe, stable and sustainable development of enterprises. Our words and deeds are closely related to the reputation and interests of the Company. Every employee should be law-abiding, honest and upright, so as to lay a solid foundation for realizing the vision of "A Century of Glory, Everlasting Success of Business".

(1) 诚信正直

(1) Honesty and integrity

人无信不立、企无信不振、国无信不兴。我们要始终坚持对所有合规规范模范遵守。不贪污腐败，不欺上瞒下，不弄虚作假，不侵犯客户、商业伙伴的权益。

The person without integrity cannot be a real man, the enterprise without integrity cannot invigorate business, and the country without integrity cannot prosper. We should always adhere to all compliance norms and models. There shall be no corruption, no deception, no fraud, no infringement of the rights and interests of customers and business partners.

(2) 守法合规

(2) Law-abiding and compliance

公司应遵守适用于公司的合规规范，包括国际条约、法律、行政法规、党内法规、行业监管规定、行业自律性规则、标准、商业惯例、道德规范、公司章程、股东决定、公司内部规章制度及上级单位（如中国五矿集团有限公司、中国冶金科工股份有限公司）适用于公司的规章制度等，确保公司依法合规经营。

The Company shall abide by applicable compliance norms, including international treaties, laws, administrative regulations, internal Party regulations, industry supervision regulations, industry self-discipline rules, standards, business practices, ethics, Articles of Association, shareholders' decisions, internal rules and regulations of the Company and rules and regulations applicable to the Company by higher-level units (such as China Minmetals Corporation and Metallurgical Corporation of China Ltd.), to ensure that the Company operates in compliance with laws and regulations.

在生产经营活动中，公司每一位员工必须严格遵守中国和经营地所在外国（地区）适用的合规规范，恪守职业操守和商业道德。守法合规是底线。

In the production and operation activities, every employee of the Company must strictly abide by the applicable compliance norms in China and the foreign countries (regions) where the business place is located, and abide by professional ethics and business ethics. Law-abiding and compliance is the bottom line.

2、公司与员工

2. Company and Employees

人是企业发展的第一要素，员工是企业的宝贵资源和财富。我们尊重每一位员工的自身价值，维护每一位员工的自身利益，关爱员工，致力于帮助员工全面发展，实现员工价值与企业价值同步提升，实现公司与员工共同成长，共享发展成果。

People are the cornerstone of enterprise development, and employees are precious resources and wealth of enterprises. We respect every employee's own value, safeguard every employee's own interests, care for employees, and strive to help employees develop in an all-round way, realize the simultaneous improvement of employee value and enterprise value, and realize the common growth and sharing of development achievements between the Company and employees.

(1) 营造和谐的劳动关系

(1) Create harmonious labor relations

①依法用工

①Employment according to law

公司遵守所适用的人权保护法律法规、国家人权行动计划以及国际人权公约，自觉抵制任何漠视与践踏人权的行为。

The Company abides by applicable human rights protection laws and regulations, national human rights action plans and international human rights conventions, and consciously resists any disregard and trampling on human rights.

公司严格遵循合法、公平、平等自愿，协商一致，诚实信用的原则，依法依规与员工订立、履行、变更、解除或终止劳动合同。**禁止雇佣童工。**

The Company strictly abides by the principles of legality, fairness, equality, voluntariness, consensus, honesty and credit, and concludes, performs, changes, dissolves or terminates labor contracts with employees according to laws and regulations. **Employment of child labor is prohibited.**

②尊重和维护员工利益

②Respect and safeguard the interests of employees

公司坚持“尊重关爱，助推成长”的人本理念，切实维护员工的合法权益。完善职业培训，助推员工成长。

The Company adheres to the humanistic concept of "respecting, caring, and facilitating cultivation" and earnestly safeguards the legitimate rights and interests of employees. Vocational training are improved to facilitate the growth of employees.

公司坚持民主管理与监督机制，涉及员工切身利益的政策和规章制度，鼓励员工参与民主决策程序。

The Company adheres to the democratic management and supervision mechanism, and encourages employees to participate in democratic decision-making procedures for policies and rules concerning the vital interests of employees.

公司建立完善职业健康、劳动保护制度,保障员工的身心健康和生命安全。

The Company establishes and improves the occupational health and labor protection system to ensure the physical and mental health and life safety of employees.

③平等对待员工

③Treat employees equally

公司为每一位员工提供平等、公平的机会。不因种族、民族、宗教、性别、肤色、国籍等原因，在聘用、薪酬福利、职业发展、奖励惩处等方面对员工歧视或差别对待。

The Company provides equal and fair opportunities for every employee. There shall be no discrimination or differential treatment of employees in terms of employment, remuneration and

benefits, career development, rewards and punishments regarding to race, ethnicity, religion, gender, color, nationality, etc.

④依法解决劳动争议

④Resolve labor disputes according to law

公司依法保障员工参加养老、医疗、工伤、失业、生育等社会保险，依法依规支付员工薪酬。The Company guarantees employees to participate in social insurance such as pension, medical care, work injury, unemployment and maternity according to law, and pays employees' salaries according to laws and regulations.

发生劳动争议时，公司倡导员工以合法方式解决诉求。员工可以自行或通过工会组织向人力资源部和法律部等部门反映。公司鼓励员工与公司协商解决劳动争议，也可以通过法律途径解决。

In case of labor disputes, the Company advocates employees to solve their demands in a legal way. Employees can report to the Human Resources Department, the Legal Department and other departments by themselves or through labor union organizations. The Company encourages employees to negotiate with the Company to solve labor disputes, or through legal approaches.

(2) 保持良好工作氛围

(2) Maintain good working atmosphere

①维护正常的工作秩序

①Maintain normal working order

公司致力于改善和提高工作环境和设施。员工要遵守工作纪律、劳动纪律和工艺纪律，文明办公，礼貌待人。工作场所和工作时间不得从事与工作无关的活动。工作场所着装整洁，施工现场按规定正确穿戴劳动保护用品。

The Company is committed to improving and enhancing the working environment and facilities. Employees should abide by work discipline, labor discipline and process discipline, work in a civilized manner and treat others politely. Employees shall not engage in activities unrelated to work in the workplace and during working hours. Employees shall dress neatly in the workplace, and wear labor protection articles correctly on the construction site according to regulations.

②构建良好的工作习惯

②Build good work habits

公司倡导员工之间相互尊重、相互信任、相互帮助的和谐发展文化。尊重他人的宗教信仰和民族习惯，禁止侮辱、诽谤、冒犯和骚扰他人的语言和行为。不造谣、不信谣、不发布歧视性等信息。

The Company advocates a harmonious development culture of respecting each other, trusting each other and helping each other among employees. Respect the religious beliefs and national customs of others, and prohibit insulting, slandering, offending and harassing others. Do not spread rumors, do not believe in rumors, and do not publish discriminatory information.

③尊重员工隐私权

③Respect the privacy of employees

公司尊重员工的隐私权。严格按照法律法规和规章制度的要求获取、使用、存储和披露员工个人信息，并采取有效措施保护员工信息。员工之间应尊重和保护个人隐私，不打听、不传播个人隐私。

The Company respects the privacy of its employees. The Company obtains, uses, stores and discloses personal information of employees in strict accordance with laws, regulations and rules, and takes effective measures to protect employee information. Employees should respect and

protect personal privacy, and do not make inquiries or spread personal privacy.

(3) 员工应遵守所有合规规范

(3) Employees should comply with all compliance norms

全体员工应充分学习、理解和遵守所有适用于其岗位或与经办业务相关的合规规范，严格依法合规办事。

All employees should fully learn, understand and abide by all compliance norms applicable to their posts or related to handling business, and act in strict compliance with laws and regulations.

员工应遵守公司各项规章制度，经常性查阅和学习公司各项规章制度，确保其行为符合规定。

Employees should abide by the Company's rules and regulations, and regularly consult and study the Company's rules and regulations to ensure that their behaviors comply with the regulations.

公司依据《诚信合规管理制度》等规章制度规定定期或不定期对员工进行合规培训，倡导员工树立合规理念，践行合规规范。

According to the "Integrity Compliance Management System" and other rules and regulations, the Company regularly or irregularly conducts compliance training for employees, and advocates employees to establish compliance concepts and practice compliance norms.

3、质量、安全、健康和环保

3. Quality, Safety, Health and Environmental Protection

公司秉承“工程优质、诚信服务、科学管理、追求卓越”和“安全第一、预防为主、以人为本、保护环境”的QHSE方针，以优质的工程产品，诚信服务于客户为宗旨；采取有效的预防措施，确保必要的资源投入，使安全风险可控，防止伤害发生。关爱员工和相关方人员健康，满足人员的职业健康需求。珍爱环境，珍惜资源，人人有责，打造绿色企业形象。

The Company adheres to the QHSE policy of "creating fine quality projects, providing integrity service, performing scientific management, striving for excellence" and "safety first, prevention first, people-oriented, environmental protection", aims at casting fine quality projects, and providing integrity service to customers; And takes effective preventive measures to ensure the necessary input of resources, so that safety risks can be controlled and injuries can be prevented. Care for the health of employees and related personnel, and meet the occupational health demands of personnel. Everyone should care for the environment, cherish resources, and take responsibility to build a green corporate image.

公司倡导公司的承包商、分包商、供应商实施相同的质量、安全、健康和环境保护要求。

The Company advocates that the Company's contractors, subcontractors and suppliers implement the same quality, safety, health and environmental protection requirements.

(1) 质量是生存之本

(1) Quality is the foundation of survival

质量是立业之本、兴业之源。我们始终以建设高标准、高品质精品工程为目标，不断改进和完善质量管理体系，强化过程控制，严把质量关，确保工程和服务质量符合标准要求，以优质的工程产品，诚信服务于客户。

Business and prosperity depend on quality. We always aim at building high-standard and high-quality fine projects, constantly improve and perfect the quality management system, strengthen process control, strictly control the quality, ensure that the engineering and service

quality meet the standard requirements, and serve customers with fine quality projects and integrity.

(2) 安全就是生命，安全就是效益

(2) Safety is life, and benefit stands on safety

安全是生命健康的保障，是企业稳定发展的基石。公司严格遵守适用的安全生产、环境保护、员工健康和公共安全法律法规、监管规则、标准规范。

Safety is the guarantee of life and health and the cornerstone of the stable development of enterprises. The Company strictly abides by applicable laws, regulations, regulatory rules and standards on production safety, environmental protection, employee health and public safety.

公司依法设置安全、环保管理机构，配备安全、环保管理人员。全体员工应不断学习和掌握安全生产知识和技能，并时刻保持警惕，不违章指挥、不违章作业。公司主要负责人和安全生产管理人员、特种作业人员应当依法依规接受培训并取得相应证书。

The Company shall set up safety and environmental protection management institutions and equip them with safety and environmental protection officers according to law. All employees should constantly learn and master the knowledge and skills of production safety, and keep vigilant at all times, and do not command or operate in violation of regulations. The Company's principals, safety production officers and special operators shall receive training according to laws and regulations and obtain corresponding certificates.

(3) 保护员工安全和健康

(3) Protect the safety and health of employees

保护员工的生命安全和身体健康，是公司应尽的基本义务。公司依法保证安全生产资金投入，生产装置、设备、设施、场所按法律法规、技术规范要求配备安全生产、劳动保护、应急处置的装备、设备、设施、工具、防护用品。

It is the basic obligation of the Company to protect the life safety and health of employees. The Company shall ensure the investment of safety production funds according to law, and the production plants, equipment, facilities and places shall be equipped with outfits, devices, facilities, tools and protective articles for safety production, labor protection and emergency disposal according to the requirements of laws, regulations and technical specifications.

员工发现危及生命安全和健康的情况，有权终止作业并向上级或安全管理部门报告。公司倡导员工在身心健康的前提下作业，当员工身体状态和精神状态难以履行岗位职责时，应立即终止工作并向上级或安全管理部门报告。

Employees have the right to terminate the operation and report to the superiors or Safety Management Department in case of any situation endangering their life safety and health. The Company advocates that employees should work on the premise of physical and mental health. When employees suffer from physical and mental illness which make them hard to perform their duties, they should immediately terminate their work and report to their superiors or Safety Management Department.

(4) 保护环境、绿色发展

(4) Protect the environment and promote green development

公司、员工应当履行环境保护的责任和义务，始终把生态文明建设和防止环境污染作为重点工作，致力于生产经营与保护环境协调发展。努力控制和减少“三废”的产生和排放，有毒有害、易燃易爆等物品应保存在专设仓库并设专人保管，做好水土保持和植被保护工作。

The Company and employees should fulfill the responsibilities and obligations of environmental protection, always focus on the construction of ecological civilization and the prevention of environmental pollution, and devote to the coordinated development of production and operation

and environmental protection. Efforts should be made to control and reduce the generation and discharge of "three wastes (waste water, waste gas and waste residue)". Toxic, harmful, flammable and explosive articles should be kept in special warehouses and monitored by special personnel, so as to ensure sound soil and water conservation and vegetation protection.

(5) 妥善处理质量和 HSE 事件

(5) Handle quality and HSE incidents properly

员工应时刻保持对质量和 HSE 突发事件的警惕性, 及时发现并消除隐患。在发生突发事件时, 应及时向上级或有关部门报告。按照应急预案采取有效措施, 控制事件影响。

Employees should be alert to quality and HSE emergencies at all times, and find and eliminate hidden dangers in time. Any emergency should be reported to the superiors or relevant departments in time. Effective measures should be taken according to the emergency plan to control the impact of events.

4、公司与商业伙伴

4. Companies and Business Partners

公司倡导依法合规经营的理念, 坚持诚实守信的交易原则, 恪守商业道德, 实现公开公平的“阳光”采购, 通过公平公正的合理报价赢得市场, 通过诚实守信的契约精神赢得客户的信任。

The Company advocates the concept of operating in compliance with laws and regulations, adheres to the trading principle of honesty and trustworthiness, abides by business ethics, realizes open and fair "transparent" procurement, wins the market through fair and reasonable quotation, and gains the trust of customers through honest and trustworthy contract spirit.

(1) 坚持诚实守信的原则

(1) Adhere to the principle of honesty and trustworthiness

①选择诚信的商业伙伴

①Choose honest business partners

公司建立健全对商业伙伴的调查、审核、批准、执行、审计、监督、培训等一系列合规管控程序, 持续优化和完善商业伙伴尽职调查、评审、管理流程。

The Company has established and improved a series of compliance control procedures for business partners, such as investigation, review, approval, execution, audit, supervision and training, and continuously optimized and improved the due diligence, review and management processes of business partners.

公司在选择商业伙伴(包括公司的承包商、分包商、供应商、服务商、项目业主; 公司的税务、环境、业务或其他代理; 公司的咨询顾问、外部律师或者合资伙伴)时, 应严格按照公司秉持的商业伙伴标准选择。公司鼓励并期望共事的商业伙伴的行为能与本手册一致, 符合公司合规的价值理念。

When selecting business partners (including contractors, subcontractors, suppliers, service providers and project owners of the Company; tax, environmental, business or other agents of the Company; consultant, external lawyer or joint venture partner of the Company), the Company shall strictly follow the business partner standards. The Company encourages and expects business partners to behave in a manner consistent with this Manual and consistent with the Company's compliance values.

当商业伙伴未能遵守公司的合规要求时, 公司应将该商业伙伴违反规定的行为录入信息系统,

情节严重的，永不再入库。

When a business partner fails to comply with the compliance requirements of the Company, the Company shall record its behavior of violating the regulations into the information system, and if the circumstances are serious, it will never be put into the pool of business partners again.

②遵守契约精神

②Abide by the contract spirit

公司积极倡导合规意识、契约精神，积极向商业伙伴传递公司的诚信合规理念和要求，在商业合同中明确合规内容和条款，要求商业伙伴做出合规承诺、正确行使合同权利，与商业伙伴一起规范自身行为，依法合规履行合同义务。

The Company actively advocates compliance awareness and contract spirit, actively conveys the Company's integrity compliance concepts and requirements to business partners, clarifies compliance contents and terms in commercial contracts, and requires business partners to make compliance commitments and correctly exercise contractual rights, and standardizes behaviors together with business partners, to fulfill contractual obligations in compliance with laws and regulations.

(2) 坚持公开公正的原则

(2) Adhere to the principle of openness and fairness

公司对所有商业伙伴一视同仁，不区别对待，不滥用优势地位或不当方式损害他方利益。确保向商业伙伴支付的任何款项不超过其提供的合法服务或货物的合理报酬，并且应通过合法渠道支付此类款项。

The Company treats all business partners equally with no difference, and does not abuse its dominant position or harm the interests of other parties in improper ways. Ensure that any payments made to business partners do not exceed reasonable remuneration for legitimate services or goods provided by them, and that such payments should be made through legal channels.

(3) 妥善处理纠纷

(3) Properly handle disputes

发生纠纷，应与对方积极协商解决。发生诉讼时应及时通知法务人员或法律部，并积极收集和保留证据。发现对方存在违约行为应积极主张权利并向法律合规部报告。

Disputes should be settled through active consultation with the other party. Legal staff or the Legal Department should be notified promptly in the event of litigation, and evidence should be actively collected and retained. When discovering the other party's breach of contract, actively claim rights and report to the Legal Compliance Department.

5、公平竞争与反垄断

5. Fair Competition and Anti-monopoly

公司、员工遵守公平竞争原则，恪守普遍存在于公司业务所在国家或地区的反不正当竞争法和反垄断法，致力于维护市场公平竞争秩序，抵制和反对以垄断和不正当竞争行为取得商业成功。

The Company and employees should follow the principle of fair competition, abide by the Anti-unfair Competition Law and Anti-monopoly Law that are common in the host countries or regions where the companies operate, devote to maintaining fair competition order in the market,

and resist and oppose commercial success through monopoly and unfair competition.

(1) 禁止不正当竞争

(1) Prohibition of unfair competition

不正当竞争是指采取违反公平、诚实信用等公认的商业道德的手段去争取交易机会或者破坏他人的竞争优势，损害客户和其他经营者的合法权益，扰乱社会经济秩序的行为。公司禁止不正当竞争的行为，倡导以自愿、平等、公平、诚实信用原则及公认的商业道德，参与竞争。

Unfair competition refers to the behavior that violates the recognized business ethics such as fairness, honesty and credit to strive for trading opportunities or destroy the competitive advantage of others, damage the legitimate rights and interests of customers and other operators, and disrupt the social and economic order. The Company prohibits unfair competition and advocates participating in competition based on the principles of voluntariness, equality, fairness, honesty and credit and recognized business ethics.

①禁止假冒他人商标

①It is forbidden to counterfeit others' trademarks

公司在对外提供服务时，不准擅自使用或假冒他人注册商标。不准销售或使用假冒他人注册商标的商品。

When the Company provides services to the outside world, it is not allowed to use or counterfeit others' registered trademarks without authorization. It is not allowed to sell or use goods with counterfeit registered trademarks of others.

②禁止招投标过程中的不当行为

②Improper behavior in the tendering and bidding process is prohibited

公司、员工不得有意误导第三方，或者与第三方故意串通、合谋、胁迫影响他人决定；不得在招投标活动中实施规避招标、虚假招标，或者虚构事实提供虚假信息骗取投标。

The Company and employees shall not intentionally mislead third parties, or deliberately collude with third parties, conspire or coerce others' decisions; it is not allowed to evade tendering, make false tendering, or fabricate facts and provide false information to defraud bid in tendering and bidding activities.

组织招标时，不得通过不正当手段操纵招标，或与投标者串通排挤其他投标者。

When organizing tenders, they shall not manipulate bidders by improper means or collude with bidders to exclude other bidders.

参与投标时、不得围标和串通投标，不准与招标者相互勾结，以排挤竞争对手的公平竞争。

When participating in bidding, they shall not rig or collude in bidding, and shall not collude with tenderers to exclude competitors from fair competition.

③不做虚假宣传

③Do not make false propaganda

公司坚持诚实信用原则，禁止利用虚假广告和其它宣传方式欺骗或误导顾客。

The Company should adhere to the principle of honesty and credit, and prohibit deceiving or misleading customers by using false advertisements and other propaganda methods.

④尊重竞争对手

④Respect competitors

不得捏造、散布虚伪事实，损害竞争对手的商业信誉、商品声誉。不得侵犯竞争对手的商业秘密。

It is forbidden to fabricate or spread false facts to damage the commercial reputation and commodity reputation of competitors. It is not allowed to infringe upon the trade secrets of

competitors.

(2) 禁止垄断行为

(2) Prohibit monopolistic practice

禁止公司与其竞争对手之间签订统一定价协议或其他协议，禁止与竞争对手谈论成本或定价信息。

It is forbidden to sign a unified pricing agreement or other agreement between the Company and competitors, and it is forbidden to talk about cost or pricing information with competitors.

除非事先获得公司合规管理部门批准，否则禁止与任何其它公司签订限制与某些供应商、经销商或其它第三方开展业务或限制其业务的协议，禁止与竞争对手就合并、收购、合资或其他类似交易展开任何形式的磋商，禁止与竞争对手商谈影响政府行为的合作活动。

Unless approved in advance by the Compliance Management Department of the Company, otherwise, it is forbidden to enter into agreements with any other company that restrict the business with certain suppliers, distributors or other third parties or restrict their business, and it is forbidden to enter into any form of negotiation with competitors on mergers, acquisitions, joint ventures or other similar transactions, and it is forbidden to negotiate cooperation activities with competitors that affect government actions.

公司、高级管理人员不得组织或参与有关协会开展的制定、发布含有排除、限制竞争内容的行业协会章程、规则、决定、通知、备忘录、标准的活动。

The Company and senior executives shall not organize or participate in the activities carried out by relevant associations to formulate and publish the articles of association, rules, decisions, notices, memorandums and standards of trade associations containing the contents of excluding or restricting competition.

6、财税与资产

6. Finance, Taxation and Assets

公司及全体员工合法经营，依法纳税，遵守财务、税务、资产管理法律法规和监管要求，努力实现国有资产保值增值。

The Company and all its employees should operate legally, pay taxes according to law, abide by laws, regulations and regulatory requirements on finance, taxation and asset management, and strive to maintain and increase the value of state-owned assets.

(1) 保证财务数据信息真实准确

(1) Ensure the truthfulness and accuracy of financial data information

①遵守财经纪律

①Observe financial and economic disciplines

公司制定报销和借支等管理制度并严格履行审批流程。报销费用必须真实并因业务而发生，不得报销未实际发生或非业务发生的费用。不得隐瞒收入，不得截留、坐支、挪用、转移资金。

The Company formulates management systems such as reimbursement and borrowing, and strictly implements the approval process. Reimbursement expenses must be true and incurred due to business, and expenses that have not actually occurred or are not incurred by business shall not be reimbursed. It is not allowed to conceal income, withhold, use revenue cash to meet expense, misappropriate or transfer funds.

②财务记录和报告真实准确

②Financial records and reports shall be true and accurate

公司、员工应严格按照财务会计法律法规和相关准则的要求，真实、客观、全面、及时地履行会计、财务记录和财务报告义务，妥善完整保存各项财务票据、审批文件、财务账册和资料。

The Company and its employees shall perform accounting, financial records and financial reporting obligations in a true, objective, comprehensive and timely manner in strict accordance with the requirements of financial accounting laws, regulations and relevant standards, and properly and completely keep all financial bills, approval documents, financial account books and materials.

③妥善保管财务记录

③Keep financial records properly

严格按照相关规定建立会计档案并妥善保管。财务票据、审批文件应装订成册并保证准确完整。

Accounting files are established and properly maintained in strict accordance with relevant regulations. Financial bills and approval documents shall be bound into a book and guaranteed to be accurate and complete.

(2) 依法纳税

(2) Pay taxes according to law

公司应遵守境内外税务法律的规定，依法履行纳税义务和税收代扣代缴义务；员工应依法履行个人纳税义务。

The Company shall abide by the provisions of domestic and overseas tax laws and fulfill its tax payment obligations and tax withholding obligations according to law; Employees should fulfill their personal tax obligations according to law.

(3) 保护公司财产

(3) Protect company property

公司全体员工应正确使用和处置财产并保护财产安全，避免浪费、毁损、误用；保护资产不被偷盗和侵权；未经批准和授权，不得擅自销售、转让或以其他方式处置资产。

All employees of the Company should correctly use and dispose of property and protect the safety of property to avoid waste, damage and misuse; Protect assets from theft and infringement; No one may sell, transfer or otherwise dispose of assets without approval and authorization.

员工不得将公司资产用于不合理的私人用途、非法用途或其他未经准许的用途。

Employees shall not use company assets for unreasonable private use, illegal use or other unauthorized use.

7、知识产权保护

7. Protection of Intellectual Property Rights

知识产权是关于人类在社会实践中创造的智力劳动成果的专有权利。知识产权包括：著作权、专利权、商标权等。公司重视知识产权的开发、利用和保护，同时尊重并防止侵犯他人的知识产权。

Intellectual property right is the exclusive right of intellectual labor achievements created by human beings in social practice. Intellectual property rights include copyright, patent right, trademark right, etc. The Company attaches importance to the development, utilization and protection of intellectual

property rights, while respecting and preventing infringement of intellectual property rights of others.

(1) 维护公司的知识产权

(1) Safeguard the intellectual property rights of the Company

公司对新的发明创造要依法及时申请或注册知识产权，并对已取得的知识产权依法维护。对侵犯公司知识产权的行为加以制止，必要时可以采取法律诉讼的方式，维护公司的利益。知识产权的许可和转让必须由公司批准。

The Company shall apply for or register intellectual property rights in time for new inventions and creations according to law, and safeguard the acquired intellectual property rights according to law. Stop the infringement of intellectual property rights of the Company, and if necessary, take legal action to safeguard the interests of the Company. Licensing and transfer of intellectual property rights must be approved by the Company.

员工在执行本单位的任务或者主要是利用本单位的物质条件所完成的发明创造为职务发明创造，专利权属于公司，员工个人不得占为己有。

Inventions and creations made by employees during the execution of their own tasks or mainly by taking advantage of the material conditions of their own units are service inventions and creations, and the patent rights belong to the Company, and individual employees may not take them as their own.

(2) 保护他人的知识产权

(2) Protect the intellectual property rights of others

公司尊重并保护他人的知识产权，当需要使用他人知识产权时，应与权利人达成使用协议或许可，严禁员工擅自侵犯他人知识产权。

The Company respects and protects the intellectual property rights of others. In case of necessity to use the intellectual property rights of others, it should reach a use agreement or license with the obligee, and it is strictly forbidden for employees to infringe on the intellectual property rights of others without authorization.

公司在新项目、新技术开发时，应及时查询相关知识产权，防止侵犯他人知识产权。

When developing new projects and technologies, the Company should inquire about relevant intellectual property rights in time to prevent infringement of others' intellectual property rights.

在国际业务中要特别重视对所在国（地区）知识产权的检索和识别，防止侵犯知识产权的事件发生。

In international business, special attention should be paid to the retrieval and identification of intellectual property rights in the host countries (regions) to prevent infringement of intellectual property rights.

8、国际工程、投资和贸易管制

8. International Engineering, Investment and Trade Control

公司开展国际业务时，应遵守国际规则和业务所在国（地区）法律法规，尊重业务所在国（地区）文化、宗教、习俗。

When conducting international business, the Company shall abide by international rules and laws and regulations of the host countries (regions) where the business is located, and respect the culture, religion and customs of the host countries (regions) where the business is located.

贸易管制是国家为了特定的经济和政治目的，通过国内立法和缔结国际条约限制外国商品进口或本国商品进出口，限制与特定国家、某些个人或实体以及某些最终用户的交易。违反贸易管制可能面临经济制裁、民事或刑事处罚。我们开展国际业务时，必须了解并遵守所有适用的进出口管制法律法规的规定。

Trade control means that a country, for specific economic and political purposes, restricts the import of foreign goods or the import and export of domestic goods through domestic legislation and international treaties, and restricts transactions with specific countries, certain individuals or entities and certain end users. Entities or individuals violating trade controls may face economic sanctions, civil or criminal penalties. When we conduct international business, we must understand and comply with all applicable import and export control laws and regulations.

(1) 遵守国际业务适用的国际条约、国际惯例和国内法律法规

(1) Comply with international treaties, international practices and domestic laws and regulations applicable to international business

开展国际业务时，公司、员工应严格遵守适用的国际条约、国际惯例和业务所在国（地区）有关签证、海关、国土安全、出入境、就业的法律法规、监管规则。

When conducting international business, the Company and employees should strictly abide by the applicable international treaties, international practices and the laws, regulations and regulatory rules of the host countries (regions) where the business is located on visa, customs, homeland security, entry and exit, and employment.

公司、员工应识别、了解所适用的我国、联合国、业务所在国（地区）对有关国家、组织、机构、企业、个人实施制裁的法律、法规和规定，依法合规开展经营活动。

Companies and employees shall identify and understand the applicable laws, regulations and provisions of China, the United Nations and the host countries (regions) where they operate on sanctions against relevant countries, organizations, institutions, enterprises and individuals, and carry out business activities in compliance with laws and regulations.

公司、员工遵守、执行所适用的我国、业务所在国（地区）进出口管制法律、法规和规定，依法取得受管制的商品、服务、技术的进出口、转售所适用的许可或授权，并严格执行许可或授权范围内有关目的地、用户、用途的规定。

Companies and employees shall abide by and implement the applicable import and export control laws, regulations and provisions of China and the host countries (regions) where they operate, obtain the licenses or authorizations applicable to the import, export and resale of controlled goods, services and technologies according to law, and strictly implement the regulations on destinations, users and uses within the scope of licenses or authorizations.

(2) 事前审核、事后报告

(2) Pre-audit and post-report

涉及进出口贸易或交易的商业活动，应对商业活动进行审核，具体审查进出口目的国、商业实体或组织是否在受制裁名单之列。

Commercial activities involving import and export trade or transactions shall be audited, specifically examining whether the import and export destination countries, commercial entities or organizations are on the sanctioned list.

经交易审查或其它合规性审核活动确认必须放弃或中断交易的，必须立即向法律合规部报告。

Where a transaction review or other compliance review activity confirms that it is necessary to abandon or interrupt the transaction, immediately report to the Legal Compliance Department.

(3) 反洗钱要求

(3) Anti-money laundering requirements

公司、员工遵守我国和业务所在国（地区）反洗钱的法律、法规和规定，绝不参与洗钱行为，绝不为他人洗钱行为提供帮助或便利。

The Company and employees should abide by the anti-money laundering laws, regulations and rules of China and the host countries (regions) where they operate, never participate in money laundering, and never provide help or convenience for others' money laundering.

9、网络安全和数据信息保护

9. Network Security and Data Information Protection

随着信息技术的不断发展，网络安全和数据信息保护问题也日显突出。公司重视信息安全工作，防范信息安全风险。公司信息安全包括：商业、人事、技术、业务等信息和涉密信息。

With the continuous development of information technology, the problems of network security and data information protection have become increasingly prominent. The Company attaches great importance to information security and prevents information security risks. Company information security includes: business, personnel, technology, business and other information and confidential information.

(1) 保护公司信息安全

(1) Protect the information security of the Company

①建立数据信息保护制度

①Establish a data information protection system

公司依法制订数据信息安全管理办法，组织相关部门和人员定期审查制度的合理性、适用性和执行情况。

The Company shall formulate data and information security management measures according to law, and organize relevant departments and personnel to regularly review the rationality, applicability and implementation of the system.

公司建立健全信息安全责任制，根据事前预防、事中监控、事后审计的整体策略，对数据采取全过程的保护，保障数据的机密性、完整性和可用性。

The Company shall establish and improve the information security responsibility system, and protect the data in the whole process according to the overall strategy of beforehand preventing, in-process monitoring and afterward auditing to ensure the confidentiality, integrity and availability of the data.

公司制定数据备份和恢复策略，采取数据分类、重要数据备份和加密等措施，应对数据泄露等安全事件。

The Company should formulate data backup and recovery strategies, and take measures such as data classification, backup and encryption of important data to deal with security incidents such as data leakage.

②严格执行保密规定

②Strictly enforce confidentiality regulations

全体员工必须严格遵守国家保密法和公司保密规定，妥善保管和使用与工作相关的的信息，避免在公共场合或私人场所涉及保密信息，禁止在公开发表的文章、网络上或媒体采访中泄露保密信息，不准在非涉密载体上存储、使用、传输涉密信息。

All employees must strictly abide by the state secrecy law and company secrecy regulations,

properly keep and use work-related information, avoid involving confidential information in public or private places, prohibit disclosure of confidential information in published articles, on the Internet or in media interviews, and prohibit storage, use and transmission of confidential information on non-confidential carriers.

③对外交往的保密规定

③Provisions on confidentiality of external exchanges

因业务需要对外部人员披露保密信息时，应按规定签订保密协议。获取的外部保密信息也应按照法律和约定采取保密措施。

When disclosure of confidential information to external personnel is required for business purposes, a confidentiality agreement shall be signed as required. Confidential measures should also be taken for the obtained external confidential information in accordance with laws and agreements.

④泄密处理

④Handling of leaks

员工发现泄密事件或泄密隐患，应及时制止并报告上级领导或公司办公室。

Employees who find leaks or hidden dangers should promptly stop and report to their superiors or company offices.

(2) 保护个人信息安全

(2) Protect personal information security

公司、员工按照合法、正当、必要的原则开展个人信息处理活动，并在任何商业活动中严格遵守所在国家及地区个人信息保护的相关要求。

The Company and employees should carry out personal information processing activities in accordance with the principles of legality, legitimacy and necessity, and strictly abide by the relevant requirements of personal information protection in the host countries and regions where any business activity is located.

(3) 信息披露

(3) Information disclosure

按照法律法规要求需要公开披露的信息，由公司授权员工依据公司规定依法披露。非授权员工严禁擅自披露。

Information that needs to be publicly disclosed according to laws and regulations shall be disclosed by employees authorized by the Company according to the Company's regulations. Unauthorized employees are strictly prohibited from disclosing without authorization.

(4) 保护网络安全

(4) Protect network security

公司、员工依法依规强化网络安全意识，加强网络安全保护和应急处理，有效防范网络攻击、计算机病毒感染、数据异常泄露等风险，禁止非法侵入、干扰公司内部及他人网络，禁止非法窃取网络数据，禁止为他人从事危害网络安全的行动提供支持等。

The Company and employees should strengthen awareness of network security according to laws and regulations, enhance network security protection and emergency response, effectively prevent network attacks, computer virus infections, abnormal data leakage and other risks, prohibit illegal intrusion and interference with the Company's internal and others' networks, prohibit illegal theft of network data, and prohibit providing support for others to engage in actions endangering network security.

(5) 人员配备

(5) Staffing

按照“制约、可控”的原则，明确网络安全和数据安全保护的管理机构，配备网络安全和数据安全管理工作人员，明确相关岗位职责，定期对各类网络安全和数据安全人员进行安全保密教育和相关网络安全、数据安全相关的技术培训和合规培训。

In accordance with the principle of "restriction and controllability", the management institutions of network security and data security protection are defined, network security and data security management staff are equipped, relevant job responsibilities are defined, and security confidentiality education and technical training and compliance training related to network security and data security are regularly provided to all kinds of network security and data security officers.

10、禁止不当行为

10. Prohibition of Misconduct

公司禁止任何形式的不当行为，包括但不限于腐败、欺诈、串通、胁迫等行为，不论是直接的还是间接的，包括通过公司有效控制下的代理人或其他中间人进行的。

The Company should prohibit any form of misconduct, including but not limited to corrupt practice, fraudulent practice, collusive practice, coercive practice, etc., whether direct or indirect, including through agents or other intermediaries under the effective control of the Company.

(1) 禁止腐败

(1) Prohibition of corrupt practice

腐败是指不诚实或不合法的行为，最常见的腐败形式是贿赂。贿赂是指以获得不当利益或交易机会为目的，直接或间接向交易对方有关人员和能够影响交易的其他相关人员给予或承诺给予现金/现金等价物、礼物或其他利益的行为。

Corruption refers to dishonest or illegal behavior, and the most common form of corruption is bribery. Bribery refers to the act of giving or promising to give cash/cash equivalents, gifts or other benefits directly or indirectly to the relevant personnel of the counterparty and other relevant personnel who can influence the transaction for the purpose of obtaining improper benefits or trading opportunities.

公司坚决遵守我国反腐败法律法规，遵守《联合国反腐败公约》，遵守业务所在国（地区）及业务所涉及国际组织、多边金融机构适用的反腐败和反贿赂法律，遵守公司及商业伙伴廉洁从业和反腐败的规定、承诺，加强廉洁文化建设。公司和员工不得以任何理由、任何形式在任何地域实施、接受商业贿赂，从事腐败行为。

The Company should resolutely abide by China's anti-corruption laws and regulations, abide by the United Nations Convention Against Corruption, abides by the anti-corruption and anti-bribery laws applicable to the host countries (regions) where it operates and international organizations and multilateral financial institutions involved in its business, abides by the regulations and commitments of the Company and its business partners on honest practice and anti-corruption, and strengthen the construction of incorruptible culture. The Company and employees shall not commit or accept commercial bribes or engage in corrupt practices for any reason or in any form in any region.

公司、员工不得为谋取商业机会、取得竞争优势或个人私利向政府机构、国际组织、商业伙伴及其官员、员工，以及这些官员、员工的特定关系人直接给予或承诺给予现金、折扣、佣金、有价证券、支付凭证、股票、股权、房产、车辆、古董和其他财产，或者旅游度假、就业机会、职务晋升等非财产性利益。

The Company and employees shall not directly give or promise to give cash, discounts,

commissions, securities, payment vouchers, stocks, equities, real estates, vehicles, antiques and other property, or non-property benefits such as travel and vacation, employment opportunities, job promotion, etc. to government agencies, international organizations, business partners and their officials and employees, as well as the specific related persons of these officials and employees, in order to gain business opportunities, competitive advantages or personal gain.

公司、员工不得为谋取商业机会、取得竞争优势或个人私利通过咨询公司、承包商、代理商、中介机构等第三方行贿或作出提供贿赂的承诺等。

The Company and employees shall not bribe or promise to provide bribes through third parties such as consulting companies, contractors, agents and intermediaries in order to seek business opportunities, gain competitive advantages or personal gain.

公司不得在任何国家（地区）以任何形式，向竞选政治职务的候选人或政党官员支付政治献金。

The Company shall not pay political capital contributions to candidates or political party officials running for political office in any country (region) in any form.

公司应要求公司的商业伙伴签署包括反商业腐败和贿赂条款的廉洁承诺书，并严格遵照执行。

The Company shall require business partners to sign a letter of commitment to integrity including anti-business corruption and bribery clauses, which shall be strictly implemented.

禁止以广告宣传费、咨询、慈善公益捐赠、社会责任费用等名义行贿或利益输送。公司严格控制广告费、宣传费、咨询费、赞助费和捐助费等费用的支出，却有必要支出时，必须按照相关规定严格审批。

It is forbidden to pay bribes or transfer benefits in the name of advertising fees, consultation, charitable donations and social responsibility fees. The Company should strictly control the expenditure of advertising fees, publicity fees, consulting fees, sponsorship fees and donation fees. If it is really necessary to spend relevant expenses, it must be strictly examined and approved according to relevant regulations.

(2) 禁止欺诈

(2) Prohibition of fraudulent practice

公平竞争是公司的核心价值观之一。禁止公司任何部门或员工为了获得业务或其他不正当利益，或者为了逃避某种义务，而误导或者协助任何其他他人误导第三方，包括歪曲事实、故意隐瞒事实、提供虚假资料或信息、明知是虚假信息却不主动澄清等。

Fair competition is one of the core values of the Company. It is forbidden for any department or employee of the Company to mislead or assist any other person to mislead a third party in order to obtain business or other illegitimate interests, or to evade certain obligations, including distorting facts, deliberately concealing facts, providing false data or information, knowingly using false information but not taking the initiative to clarify it, etc.

(3) 禁止串通

(3) Prohibition of collusive practice

禁止公司任何部门或员工与第三方串通、合谋或有目的地设计某种安排，以不适当地影响他人的决定，例如串标、陪标、串通抬高价格等。

It is forbidden for any department or employee of the Company to collude with a third party, conspire or purposefully design an arrangement to unduly influence the decision of others, such as colluding with bidding, accompanying bidding, colluding with raising prices, etc.

(4) 禁止胁迫

(4) Prohibition of coercive practice

禁止公司任何部门或员工通过对他人施压而不适当地影响他人的行为，即直接或间接地伤害或者破坏他人人身或财产，或者以此为威胁从而迫使他人作出本不会作出的行为，包括使用武力、政治权力、或其他威胁手段。

It is forbidden for any department or employee of the Company to unduly influence others by exerting pressure on others, that is, to directly or indirectly harm or destroy others' safety or property, or to use this as a threat to force others to do acts that they would not have done, including the use of force, political power, or other threats.

11、礼品与招待

11. Gifts and Hospitality

公司及其分子公司的任何部门或员工送礼和招待，须严格遵守《礼品纪念品管理实施细则》《业务招待费管理办法》《业务招待费管理实施细则》《总部人员履职待遇及业务支出管理办法》《所属单位负责人履职待遇及业务支出管理办法》《企业负责人履职待遇及业务支出管理办法》等相关规定及公司和集团不时发布的相关规章制度等。

Gifts and hospitality by any department or employee of the Company and its branch companies and subsidiaries, must strictly abide by the "Detailed Rules for the Implementation of Gift Souvenir Management", "Measures for the Administration of Business Hospitality Expenses", "Detailed Rules for the Implementation of Business Hospitality Expenses", "Measures for the Administration of Performance Remuneration and Business Expenses for Personnel of the Headquarters", "Measures for the Administration of Performance Remuneration and Business Expenses of Heads of Subordinate Units", "Measures for the Administration of Performance Remuneration and Business Expenses of Heads of Enterprises", and relevant rules and regulations issued by the Company and the Group from time to time.

(1) 公务接待和礼品

(1) Official reception and gifts

经营活动中公司遵守必要的商业礼仪和惯例，按照规定可以接受或提供小额、具有纪念意义的、非经常性的伴手礼，以及恰当的接待。国内公务活动中，原则上不对外赠送或收受礼品纪念品。

In business activities, the Company should abide by the necessary business etiquette and practices, and can accept or provide small, commemorative and non-regular accompanying gifts and appropriate reception according to regulations. In domestic official activities, in principle, gifts and souvenirs are not given or received.

公司禁止员工索要礼品或接待，禁止提供或收受不符合公司规定的或可能影响商业决策的礼品或接待。

Employees of the Company are forbidden to ask for gifts or receptions, and it is forbidden to offer or accept gifts or receptions that do not conform to company regulations or may affect business decisions.

(2) 赞助和捐赠

(2) Sponsorship and donation

赞助、捐赠是公司履行社会责任的重要形式，但公司只允许以公益为目的的赞助和慈善捐赠，不得为了获取不当业务优势而承诺、提供或进行赞助和捐赠。公司不允许任何形式的政治捐

赠。

Sponsorship and donation are important forms for the Company to fulfill its social responsibilities, but the Company should only allow sponsorship and charitable donations for public welfare purposes, and may not promise, provide or give sponsorship and donation in order to obtain improper business advantages. The Company does not allow any form of political donation.

(3) 涉及政府官员的付款

(3) Payments involving government officials

严禁公司任何部门、分支机构或员工为取得或维持业务而直接或间接向政府官员行贿或作出提供贿赂的任何承诺或支付。

It is strictly forbidden for any department, branch or employee of the Company to directly or indirectly pay bribes to government officials or make any promise or payment of bribes in order to obtain or maintain business.

公司任何部门、分支机构或员工都不得违反公司开展业务的司法辖区（包括所有海外地区）适用的任何反贿赂合规规范。

No department, branch or employee of the Company shall violate any anti-bribery compliance applicable in the jurisdiction in which the Company conducts business (including all overseas regions).

严禁通过公司的商业伙伴或其他中间人，直接或间接地向任何政府官员提供、支付、赠与或承诺支付任何有价值之物或授权实施这些行为。

It is strictly forbidden to offer, pay, give or promise to pay anything of value or authorize such acts directly or indirectly to any government official through the Company's business partners or other intermediaries.

(4) 收礼

(4) Receiving gifts

公司任何部门或员工不得收受可能影响其公正履行职权和开展业务的礼品、礼金、礼券以及购物卡。

Any department or employee of the Company shall not accept gifts, cash, gift coupons and shopping cards that may affect their fair performance of duties and business.

对于由于各种原因未能拒收的礼品、礼金、礼券以及购物卡等，应按不同标准分别处理。

Gifts, cash, gift coupons and shopping cards that cannot be rejected due to various reasons should be handled according to different standards.

(5) 禁止支付疏通费

(5) Prohibition of facilitation fee

公司禁止向行使行政或司法职能的人员为加快或保证履行其法定职责而额外支付的小额现金或其他好处（疏通费）。

The Company should prohibit the payment of additional petty cash or other benefits (facilitation fees) to persons exercising administrative or judicial functions to expedite or ensure the performance of their statutory duties.

当危及到员工生命安全的情况下允许支付疏通费，但必须如实准确记录在案。

It is allowed to pay the facilitation fee when the life safety of employees is endangered, but it must be recorded truthfully and accurately.

为加急办理相关事项，向行政或司法机关的账户支付并收到正式收据的费用，不属于疏通费。

Fees paid to the accounts of administrative or judicial organs and received with official receipts for expediting related matters do not belong to facilitation fees.

12、利益冲突与利益输送

12. Conflict of interest and transfer of benefits

利益冲突是员工履行公司职务所代表的公司利益与其自身的个人利益之间存在冲突或潜在的冲突，使员工处于难以有效或公正履行工作职责，进而可能损害公司利益的情形。公司的所有员工应以公司利益为佳，尽力避免个人行为及利益与公司利益发生冲突或可能导致发生冲突的情况，员工应当始终坚持维护公司的利益和声誉。

Conflict of interest refers to the conflict or potential conflict between the Company interests represented by employees performing their duties and their own personal interests, which makes it difficult for employees to perform their duties effectively or fairly, and may further damage the interests of the Company. All employees of the Company shall take the interests of the Company as priority, try their best to avoid conflicts between personal actions and interests and the interests of the Company or situations that may lead to conflicts, and employees shall always insist on safeguarding the interests and reputation of the Company.

(1) 避免利益冲突

(1) Avoid conflicts of interest

①禁止以权谋私

①Abuse of power for personal gain is prohibited

公司的所有商业决定，都应以公司利益为先。员工应正确处理个人利益和公司利益，不利用职务便利、职权影响力，将公司利益转移给其他企业或个人。

All business decisions of the Company should put the interests of the Company first. Employees should correctly handle personal interests and company interests, and do not take advantage of their positions and powers to transfer company interests to other enterprises or individuals.

禁止任何员工在公司的业务活动中为个人（包括其本人、亲属或其他受益个人）谋取私利。

It is forbidden for any employee to seek personal gain for individuals (including himself, relatives or other beneficiary individuals) in the business activities of the Company.

②竞业限制

②Non-competition restriction

员工不得在与公司竞争的单位兼职，不得为竞争者提供帮助，不得投资与公司存在竞争关系的非上市企业。公司员工不得利用职务上的便利，自营、合营或者为他人经营与公司同类的业务。

Employees are not allowed to work part-time in units competing with the Company, or to provide assistance to competitors, and to invest in non-listed enterprises competing with the Company. Employees of the Company shall not take advantage of their positions to operate businesses similar to the Company on their own, in joint ventures or for others.

员工退休或离职后，仍需按照法律规定或劳动合同约定，接受竞业限制，不得利用在公司期间掌握的信息、资源，与公司开展同业竞争。

After retirement or resignation, employees are still subject to non-competition restrictions in accordance with the law or labor contract, and may not use the information and resources they have mastered during their stay in the Company to compete with the Company.

(2) 禁止利益输送

(2) Prohibit the transfer of benefits

公司的资产和信息只能用于工作目的，不得利用公司资产和信息为自己或他人谋取利益。

The Company's assets and information can only be used for work purposes, and it is not allowed to use the Company's assets and information to seek benefits for itself or others.

禁止员工亲属在其管辖范围内违规经商办企业和开展业务。任何员工不得插手或干扰市场准入、招投标和合同签订等，不准指定或授意指定交易对象，不准向特定关系人透露招投标标底、内幕消息等。

Relatives of employees are prohibited from running enterprises and conducting business in violation of regulations within their jurisdiction. No employee is allowed to intervene or interfere with market access, tendering and bidding and contract signing, etc., and is not allowed to designate or instruct the designated trading object, and is not allowed to disclose the base price and inside information of tendering and bidding to specific related parties.

(3) 及时汇报

(3) Timely reporting

当员工的个人利益可能影响该员工客观合理的判断以及对公司的忠诚义务时，相关员工和任何知悉存在利益冲突情况的员工都应该将可能出现利益冲突的情况报告给其所在部门、分子公司的合规管理员或者公司法律合规部，以确定是否需要进行回避。

When an employee's personal interests may affect the employee's objective and reasonable judgment and loyalty obligation to the Company, the employee concerned and any employee who is aware of a conflict of interest should report the possible conflict of interest to their department, the compliance officer of the branch companies and subsidiaries or the Legal Compliance Department of the Company to determine whether withdrawal is necessary.

13、政府、协会和社区

13. Government, Association and Community

我们肩负着央企的社会责任，公司健康发展和员工的生活保障与政府和社区紧密相连，加强与政府和社区的沟通交流创造良好的工作和生活环境；加强与行业协会的沟通交流助力公司打造“国内领先，国际知名的工程公司”。

We shoulder the social responsibility of central state-owned enterprises. As the healthy development of the Company and the living security of employees are closely linked with the government and the community, we should strengthen communication with the government and the community to create a good working and living environment; And strengthen communication with trade associations to help the Company build a "leading domestic and internationally renowned engineering company".

(1) 加强与政府的沟通交流

(1) Strengthen communication with the government

公司提倡与政府进行及时、坦诚和主动的沟通交流，积极寻求政府的支持和帮助，合理合法地反映情况和诉求。积极主动地提供法律法规和政府要求的信息和数据。

The Company advocates timely, frank and active communication with the government, actively seeks the support and help of the government, and reasonably and legally reflects the situation and demands. We should proactively provide information and data required by laws, regulations and the government.

(2) 加强与协会的沟通交流

(2) Strengthen communication with the association

公司与行业协会达成良好的沟通交流渠道，为提高商业合规标准和透明度作出积极贡献，以持续完善防范不当行为的机制。

The Company has reached a good communication channel with industry associations, and made positive contributions to improving business compliance norms and transparency, so as to continuously improve the mechanism for preventing misconduct.

(3) 支持社区公益事业

(3) Support public welfare undertakings of community

公司认真履行央企的社会责任，积极支持社区公益事业建设，倡导员工参加社会公益活动。与社区建立良好的沟通渠道，及时解决矛盾和问题。

The Company should earnestly fulfill the social responsibility of central state-owned enterprises, actively support the construction of community public welfare undertakings, and advocate employees to participate in social welfare activities. Establish good communication channels with the community to solve contradictions and problems in time.

(4) 履行社会责任

(4) Fulfill social responsibilities

尊重中国及经营地所在外国（地区）的文化与习俗，积极参与和支持社区公益事业建设，加强与当地政府的沟通 and 交流。在开展经营活动中，避免侵犯当地社区与公众利益。

Respect the culture and customs of China and foreign countries (regions) where they operate, actively participate in and support the construction of community public welfare undertakings, and strengthen communication and exchanges with local governments. In carrying out business activities, avoid infringing on the interests of local communities and the public.

14、合规举报

14. Compliance Reporting

公司鼓励全体员工、客户、商业伙伴以及相关第三方对违反合规规范的行为进行举报。

The Company should encourage all employees, customers, business partners and relevant third parties to report violations of compliance norms.

举报方式包括但不限于：电话、电子邮件、传真、信函等方式，实名或匿名举报。

Reporting methods include but are not limited to telephone, e-mail, fax, letter, etc., real name or anonymous reporting.

举报人及其举报信息受到保护，禁止任何针对投诉举报人的打击报复行为。公司对所有投诉举报都会认真对待，调查核实后必要时会采取相应措施。

Informants and their reported information are protected, and any retaliation against complaining informants is prohibited. The Company will take all complaints and reports seriously, and take corresponding measures when necessary after investigation and verification.

公司举报热线一：

Company reporting hotline one:

举报平台：公司纪检监察部

Report platform: Discipline Inspection and Supervision Department of the Company

举报电话: 027-68868891

Report telephone number: 027-68868891

举报邮箱: yyjtjiwei@sina.com

Report email: yyjtjiwei@sina.com

纸质举报信件收件地址: 武汉市青山区工业大道三号一冶纪委

Address of paper report letter: Commission for Discipline Inspection of China First Metallurgical Group Co., Ltd., No.3, Gongye Avenue, Qingshan District, Wuhan

纸质举报信件收件人: 一冶纪委

Paper report letter recipient: Commission for Discipline Inspection of China First Metallurgical Group Co., Ltd.

公司举报热线二:

Company reporting hotline two:

举报平台: 公司法律与合规管理部

Report platform: Legal and Compliance Management Department of the Company

电话: 027-68868394

Tel: 027-68868394

电子信箱: flswb@cfmcc.com

E-mail: flswb@cfmcc.com

诚信合规手册

Integrity Compliance Manual

员工承诺书

Employee's Letter of Commitment

本人已收到并确认对《中国一冶集团有限公司诚信合规手册》《中国一冶集团有限公司合规管理制度》的内容进行了认真阅读，充分理解公司诚信合规要求和违反合规规范将承担的责任。本人郑重承诺：严格遵守本手册和公司相关合规管理制度的规定，发现违反合规规范的行为及时向公司报告，如有违反，愿意承担相应责任。

I have received and confirmed that I have carefully read the contents of the Integrity Compliance Manual and Compliance Management System of China First Metallurgical Group Co., Ltd., and fully understand the Company's integrity compliance requirements and the responsibilities for violating compliance norms. I solemnly promise to strictly abide by the provisions of this Manual and relevant compliance management systems of the Company, report to the Company any violation of compliance norms timely and be willing to take relevant responsibilities for breach of promise.

本人签字：

Signature:

日期：

Date:

(员工留存页)

(Employee Retention Page)

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本人签字：

Signature:

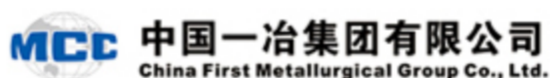
日期：

Date:

(公司留存页)

(Company Retention Page)

诚信正直
Honesty and integrity
守法合规
Law-abiding and compliance



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