

Sinochem HK Anti-Bribery and Anti-Corruption Policy

As the offshore financing platform and a key overseas asset holding Company of Sinochem Holdings, Sinochem Hong Kong (Group) Company Limited (“Sinochem HK” or the “Company”) upholds the code of conduct of “Adhering to Social Justice, Integrity and Kindness, Abiding by Professional Ethics and Professional Conduct, and Practicing with Integrity” to eliminate all forms of corruption.

Purpose

The Company has formulated and released this policy with an aim to prohibit any form of corruption in all business transactions, including but not limited to offering or accepting bribes, embezzlement, encroachment, extortion, fraud and money laundering. The Company is committed to establish and continually improves the general supervision system to strengthen the prevention and control of integrity risks in key areas, and shall continuously promote integrity training and education to enhance the anti-corruption awareness among all employees.

Scope of Application

This policy applies to all employees (including informal employees such as contractors, interns, and rehired retirees) of Sinochem Hong Kong (Group) Company Limited and its affiliates, and the Company encourages all business partners and other stakeholders, including business associates, related companies, contractors and suppliers, to comply with this policy.

Policy

1. Responsibility and Implementation

1.1 The Company's board of directors has overall responsibility for the monitoring and regular review of this policy. The Office and the Legal and Compliance Department take responsibility for the specific daily implementation of anti-corruption and anti-bribery acts, and report to the board of directors.

1.2 Daily execution includes but is not limited to monitoring bribery and corruption risks, identifying relevant business processes, evaluating the possibility and impact of risks in business functions or processes, etc., to reduce the occurrence of relevant risks, and timely and properly deal with bribery and corruption acts.

2. Anti-Bribery and Anti-Corruption

The Company is committed to complying with the anti-bribery and anti-corruption laws, regulations and rules of all regions and countries involved in the Company's operations,

and prohibits directors and employees from engaging in any form of bribery involved in the above laws, regulations and rules, including but not limited to:

- Making improper payments, kickbacks and other forms of bribery, directly or indirectly, to the directors, employees or agents of another enterprise
- Soliciting interests from the customers, suppliers or other parties engaged in business transactions with the Company
- Offering or receiving any gift, reward or hospitality or other advantages that might be perceived to unfairly influence the Company's business
- Accepting frequent or extravagant entertainment activities from parties engaged in business transactions with the Company
- Offering advantages to any public official or personnel who holds public office to influence such personnel on gaining business or advantage for the Company
- Conducting bribery through any parties acting on behalf of others

3. Political and Charitable Contributions and Sponsorships

3.1 Prior to giving any donations or sponsorships, the Company must understand whether the institution is in line with the Company's corporate culture and values. Such donations or sponsorships must comply with applicable laws and regulations as well as the regular approval processes of the Company. Any charitable donations as a means of bribery are prohibited. The Company shall keep proper records of such donations or sponsorships for inspection.

3.2 Directors and employees cannot make any sponsorships that may be related to bribery or corruption.

3.3 The Company prohibits political contributions of all forms and will not make any donations to political groups or individual politicians.

4. Conflict of Interest

4.1 "Conflict of interest" is a situation in which an individual is confronted with choosing between his/her job function and personal interests. Directors and employees themselves and the parties relating to them, including their families and relatives, should avoid conducting businesses that may cause conflict of interests.

4.2 "Conflict of interest" includes the conflict of interests in job owing to kinship relationships between employees and conflict of interests in business owing to kinship relationship between relevant external parties and employees handling and directing such business when engaged in cooperation with external suppliers, contractors and customers.

4.3 Directors and all employees must also abide by the Company's regulations. When there is a conflict of interest in job or business, they immediately and proactively declare

the relevant conflict of interest to the Company's Office and the Legal and Compliance Department. All filings and decisions must be properly documented. The Office and the Legal Compliance Department shall ensure that all employees follow relevant instructions so as to effectively eliminate or mitigate the conflict of interest involved.

4.4 Upon receiving the declaration of conflict of interest, the Office and the Legal and Compliance Department should report to the Company's ESG Working Group after making a preliminary assessment, and provide an opinion on avoidance. Employees subject to conflict of interests in job should avoid by building a Chinese wall. Employees subject to conflict of interests in business should not participate in the execution or decision-making of such business.

4.5 If an employee who is aware of a conflict of interest fails to report it within the stipulated timeframe, or refuses to implement the decision on avoidance, he/she shall be dealt with the relevant internal regulations of the Company after such violation is verified by the Office and the Legal and Compliance Department through follow-up investigations.

5. Relationships with Suppliers, Contractors and Customers

5.1 The Company's suppliers, contractors and other partners shall apply the same standards as the Company for quality, environment, health and safety, employment, and compliance management, etc. The Company shall conduct its procurement in a transparent manner. Employees must act with prudence in their assessment of suppliers and contractors, and the procurement of products and services must be in compliance with the following fundamental principles to prohibit the improper benefits from such purchase:

- Competitive tendering must be conducted among candidates who fulfill tender requirements
- Participation in illicit operation such as collusive tendering or bid rigging is prohibited
- Disclosure of confidential commercial information to prospective suppliers or other related parties is prohibited
- Discriminatory or biased terms and conditions shall not be used in the tender process of procurement
- Assessment shall be conducted in strict accordance with the assessment standards. Relevant information generated in the procurement process shall be sorted, collected and kept in strict accordance with relevant provisions and unauthorized alteration, forgery and provision of false materials is prohibited

5.2 The Company formulated and issued the "Sinochem HK Supplier Code of Conduct" to properly prevent and manage the risks of corruption and bribery in the supply chain.

5.3 The Company established a transparent and honest cooperation mechanism, severely cracks down on commercial bribery, unfair competition and other violations of laws and regulations, adopts a zero-tolerance policy for any form of corruption and dishonesty, and avoids doing business with companies and personnel known or suspected of engaging in corrupt practices. The Company requires all external parties that have business transactions with the Company to understand and abide by this policy, and encourages them to formulate internal anti-corruption policies and accept regular inspections. Before the Company starts or continues business relationships with customers, suppliers or any other potential business partners, employees should take appropriate measures to identify and verify their identities and, if necessary, conduct risk assessments of money laundering and illegal financing. For companies and individuals that have been proved to have problems, the Company will deal with it seriously in accordance with relevant regulations to prevent misconduct in the supply chain.

6. Whistleblowing and Handling of Violation Cases

6.1 The whistleblowing policy of the Company also provides a confidential and safe channel for whistleblowing for the directors, employees and relevant third parties, and encourages employees to report on any actual or suspected corruption or bribery, and then conduct a detailed investigation. The Company will protect employees who report honestly, and prohibit any retaliation against such employees.

6.2 The Company will refer material cases in breach of this Policy or matters involving legal offences to relevant law enforcement authorities for investigation and shall retain all relevant evidences.

6.3 Directors and employees must cooperate honestly with any investigation into alleged breach of this policy and shall not refuse or provide untruthful information. Any directors or employees in breach of this policy shall be subject to disciplinary actions, including dismissal or termination of contract.

7. Financial Management and Bookkeeping

7.1 The Company has a complete financial management system and a clear division of responsibilities before, during and after the event to ensure the accuracy and completeness of its accounts and books, and to supervise and prevent any misconduct.

7.2 All expenditures must be supported by documentary evidences that accurately describe the relevant expenditure. The falsification of books or records is prohibited.

8. Training

8.1 Directors and employees shall comply with the provisions under this policy and other relevant internal regulations to prevent bribery and corruption.

8.2 The ESG Working Group of the Company is responsible for providing anti-bribery and anti-corruption training for all employees, including new employee training, regular training, rectification and assessment, as well as announcement of cases for warning purposes, etc.

The Company will review and update this policy from time to time or at least every three years.

Should there be any discrepancy between Chinese and English versions, the Chinese version shall prevail.