

# **Sinochem HK Code of Business Ethics**

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”) strictly complies with all laws and regulations, corporate governance standards and business ethics. The Company is committed to building a business environment and partnerships of integrity and mutual benefit with a view to creating more value for stakeholders.

## **Purpose**

The Company has formulated and released this policy with a view to strengthening corporate governance, regulating business cooperation, providing employees with clear business ethics guidelines.

## **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. The Company’s board of directors supervises and takes the responsibility of the business ethics involved in this policy.

## **Policy**

### **1. Anti-monopoly and Fair Competition**

1.1 The Company undertakes to comply with all applicable anti-monopoly and anti-unfair competition related laws and regulations at all times, to strengthen risk monitoring and self-supervision, and to ensure that there is no monopoly, bribery, fraud or unfair competition during the Company’s operations.

1.2 Strictly manage activities such as charitable donations, business sponsorships, corporate gifting and business hospitality to ensure that relevant business activities are conducted in compliance with anti-monopoly and fair competition requirements.

### **2. Conflicts of Interest**

2.1 The Company shall strengthen the management of conflicts of interest and accurately identify situations involving conflicts of interest. In the event that an employee’s personal interests contradict or conflict with the Company’s interests, s/he shall take the initiative to report the situation and apply for abstention to ensure that conflicts of interest are properly addressed in accordance with relevant rules.

### **3. Anti-bribery and Anti-corruption**

3.1 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, including but not limited to offering or accepting bribes, embezzlement, encroachment, extortion, fraud and money laundering.

3.2 The Company has established and continually improved 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.

#### **4. Political Contributions**

4.1 The Company strictly abides by the laws and regulations of the country or region where it operates, and prohibits all forms of political donation. In case of bribery of state officials or government officials, the case shall be handled with reference to relevant local laws and regulations and other relevant rules of Sinochem HK.

#### **5. Regular Audits**

5.1 The Company conducts audits of its ethical standards of all operations at least once three years, covering all employees.

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.