

昌富利（厦门）有限公司
反腐败与反贿赂政策
Cheongfuli (Xiamen) Co., Ltd.
Anti-Corruption and Anti-Bribery Policy

1 目的 Purpose

昌富利（厦门）有限公司（以下简称“昌富利”或“公司”）在所有经营活动中严格遵守反腐败相关法律法规，以透明、公正、诚信的方式开展业务，坚决抵制任何形式的腐败与贿赂行为。本政策旨在为公司全体员工及业务合作伙伴提供明确的行为准则与合规指引。

Cheongfuli (Xiamen) Co., Ltd. (hereinafter referred to as “Cheongfuli” or “the Company”) strictly complies with laws and regulations relating to anti-corruption in all business activities, conducts business in a transparent, fair, and honest manner, and firmly resists all forms of corruption and bribery. This policy is intended to provide clear standards of conduct and compliance guidance for all employees and business partners of the Company.

2 适用范围 Scope

本政策适用于昌富利及其所有拥有运营控制权的实体，各单位可根据其实际情况及行业特点制定相应的反腐败与反贿赂政策，并需与本政策保持一致。

This policy applies to Cheongfuli and all entities over which it has operational control. Each entity may formulate its own anti-corruption and anti-bribery policy based on its actual circumstances and industry characteristics, which shall be consistent with this policy.

3 腐败和贿赂的含义 Definition of Corruption and Bribery

腐败是指滥用权力、职位、地位或资源等，为本人或特定关系人谋取私利，致使公司利益受损的行为。贿赂是指给予、承诺给予他人财产性利益或其他利益以谋取私利，导致公司利益受损的行为。

Corruption refers to the abuse of power, position, status, or resources to obtain personal benefits for oneself or designated related parties, thereby causing harm to the Company's interests. Bribery refers to the act of giving or promising to give property interests or other benefits to another person for the purpose of securing personal gain, resulting in harm to the Company's interests.

4 禁止事项 Prohibited Conduct

禁止员工亲自或授意他人代为实施以下行为：

Employees are prohibited from engaging, whether directly or through others at their direction, in the following conduct:

4. 1 向公职人员或其代表直接或间接提供或承诺提供任何款项或其他有价物，以谋取不正当利益；

Directly or indirectly providing or promising to provide any money or other valuable items to public officials or their representatives in order to obtain improper benefits.

4. 2 向私人机构或其工作人员，直接或间接提供或承诺提供任何款项或其他有价物，以获取、维持或回报商业利益；

Directly or indirectly providing or promising to provide any money or other valuable items to private entities or their personnel in order to obtain, retain, or reward business benefits.

4. 3 在商业谈判、招标投标、合同签订及履行等环节，给予或收受任何可能影响公正决策的任何款项或其他有价物；

Giving or accepting any money or other valuable items that may influence impartial decision-making in the course of business negotiations, tendering and bidding, contract signing and performance, or other processes.

4. 4 员工个人或通过代理人、顾问、家庭成员等，接受第三方任何款项或其他有价物，以此作为公司向该第三方或任何其他人员提供商业利益的回报；

Employees, whether directly or through agents, consultants, family members, or other parties, accepting any money or other valuable items from a third party in return for the Company providing business benefits to such third party or any other person.

4. 5 利用职务上的便利，侵吞、窃取、骗取或以其他方式非法侵占公司财产；

Misappropriating, stealing, fraudulently obtaining, or otherwise illegally occupying Company property by taking advantage of one's position or authority.

4. 6 为促进或加快取得政府有关部门例行职责或事务处理而给予疏通费；

Providing facilitation payments to induce or expedite the routine duties or administrative actions of government authorities or officials.

4.7 发生其他腐败贿赂行为或违反本政策的行为。

Engaging in any other acts of corruption or bribery, or any conduct that violates this policy.

5 礼金、礼品和招待 **Cash Gifts, Gifts, and Entertainment**

公司要求业务活动中所有礼金、礼品收受与商务招待必须以合法合规、公开透明、价值适度为前提，杜绝任何可能发生的腐败或贿赂行为。任何员工在向第三方提供与公司业务相关的礼品、礼金或招待之前，须履行相应的审批程序。员工收到第三方提供的超出合理范围内或可能对业务造成不公平影响的礼金、礼品时，应当拒收或退回，若无法拒绝的，员工须在收受后及时上缴公司登记备案。

The Company requires that all acceptance of cash gifts and gifts and all business entertainment in the course of business activities be conducted on the premise of lawful compliance, openness and transparency, and appropriateness in value, so as to eliminate any potential corruption or bribery. Prior to providing any gifts, cash gifts, or entertainment related to the Company's business to a third party, employees shall undergo the corresponding approval procedures. Where an employee receives cash gifts or gifts from a third party that fall outside a reasonable scope or may cause unfair influence on business, the employee shall decline or return them. If it is impossible to decline, the employee shall promptly surrender them to the Company for registration and filing upon receipt.

6 赞助、慈善捐赠和社区投资 **Sponsorship, Donations, and Community Investments**

公司遵循合法合规、合乎道德原则开展赞助、慈善捐赠或社区投资，避免其对公司任何商业决策产生不当影响。公司进行赞助、慈善捐赠或社区投资应按内部制度履行审批决策程序，并妥善保存该等捐款、赞助及社区投资记录。

The Company conducts sponsorship, charitable donations, or community investments in accordance with the principles of lawful compliance and ethical conduct, and shall avoid any undue influence on the Company's commercial decisions. The Company shall undergo approval and decision-making procedures in accordance with internal rules when making sponsorship, charitable donations, or community investments, and shall properly maintain records of all such donations, sponsorship, and community investments.

7 培训与宣导 **Training and Awareness**

公司持续加强反腐败反贿赂教育宣导与培训，面向全体员工传达宣导反腐败与反贿赂相关法律法规、公司政策制度要求以及典型警示案例。同时，公司积极向供应链上下游合作伙伴传达本政策要求，推动构建廉洁商业生态。

The Company continuously strengthens anti-corruption and anti-bribery education, awareness, and training, and communicates to all employees the relevant laws and regulations, Company policies and rules, and typical cautionary cases relating to anti-corruption and anti-bribery. The Company also actively communicates the requirements of this policy to upstream and downstream supply chain partners, and promotes the establishment of a clean business ecosystem.

8 投诉举报 **Reporting and Whistleblowing**

公司鼓励员工、合作伙伴等利益相关方积极向公司实名/匿名报告或投诉可能发生或已经发生的腐败行为。公司严格保护举报人身份信息，未经举报人同意，不得向被举报对象或其他无关人员透露举报人情况。任何员工不会因拒绝参与、配合调查或善意举报腐败贿赂活动而遭受解雇、降职、调岗、减薪或其他不利待遇。针对打击报复行为，公司将从严从重追究责任。

The Company encourages employees, business partners, and other stakeholders to proactively report or file complaints, whether by name or anonymously, regarding potential or actual acts of corruption to the Company. The Company strictly protects the identity information of whistleblowers, and shall not disclose the whistleblower's circumstances to the person being reported or other irrelevant persons without the whistleblower's consent. No employee shall suffer termination, demotion, reassignment, pay reduction, or other adverse treatment for refusing to participate in, cooperating with investigations into, or reporting in good faith any corrupt or bribery-related activities. Retaliation in any form shall be subject to severe and heightened accountability.

9 责任追究 **Accountability**

任何员工违反本政策的，公司将视情节采取相应处罚措施，包括但不限于降职、解雇、索赔等。任何供应商、客户、代理、顾问及其他与公司发生业务往来的第三方违反本政策的，公司有权依据法律规定或合同约定追究其法律责任，采取终止合作关系、索取赔偿等相应措施。

Where any employee violates this policy, the Company shall impose corresponding disciplinary measures based on the circumstances, including but not limited to demotion, termination of employment, and claims for damages. Where any supplier, customer, agent, consultant, or other third party having business dealings with the Company violates this policy, the Company reserves the right to pursue legal liability in accordance with legal provisions or

contractual agreements, and to take corresponding measures such as terminating the business relationship and claiming compensation.

10 **生效 Effective Date**

本政策自公布之日起生效。

This policy shall come into effect from the date of its publication.

昌富利（厦门）有限公司
Cheongfuli (Xiamen) Co., Ltd.

2026 年 月 日

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