

昌富利（厦门）有限公司
商业行为准则
Cheongfuli (Xiamen) Co., Ltd.
Business Code of Conduct

1 目的 Purpose

为倡导诚信正直、廉洁守正、恪尽职守的职业行为，明确昌富利（厦门）有限公司（以下简称“昌富利”或“公司”）全体员工的从业底线与责任要求，防范各类违规违纪及不道德行为，保障公司各项业务合法合规开展，并积极承担对环境和社会的企业责任，维护公司利益与声誉，特制定本商业行为准则。同时，公司也鼓励并推动供应商、承包商、客户等业务合作伙伴共同遵守本准则，践行负责任商业行为。

This Business Code of Conduct is hereby established to advocate professional conduct characterized by integrity and honesty, probity and uprightness, and due diligence, define the baseline conduct and accountability requirements for all employees of Cheongfuli (Xiamen) Co., Ltd. (hereinafter referred to as “Cheongfuli” or “the Company”), prevent all forms of rule-breaking, disciplinary violations, and unethical conduct, ensure that all business activities of the Company are conducted in a lawful and compliant manner, proactively fulfill corporate responsibilities towards the environment and society, and safeguard the interests and reputation of the Company. The Company also encourages and promotes suppliers, contractors, customers, and other business partners to jointly comply with this Code and practice responsible business conduct.

2 适用范围 Scope

本准则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制定相应的商业行为准则，并需与本准则保持一致。

This Code applies to Cheongfuli and all entities over which it has operational control. Each entity may formulate its own business code of conduct based on its actual circumstances, which shall be consistent with this Code.

3 诚信合规经营 Integrity and Compliance in Business Operations

公司全体员工须坚守合法合规底线，将合规经营、诚信做人作为日常工作的基本准则，秉持诚信正直、廉洁自律的道德标准，自觉维护个

人职业信誉与公司声誉形象，坚决杜绝一切违法违规或不正当、不道德的执业行为。

All employees of the Company shall uphold the baseline of lawful compliance and take compliant operations and honest conduct as the fundamental principles in their daily work, adhere to the ethical standards of integrity, honesty, probity, and self-discipline, conscientiously safeguard their personal professional reputation and the Company's image, and resolutely refrain from all illegal, non-compliant, improper, or unethical conduct.

4 反腐败与反贿赂 Anti-Corruption and Anti-Bribery

公司杜绝一切腐败和贿赂行为。公司员工不得收受他人贿赂或向他人行贿、介绍贿赂，不得利用职务便利提供或收取可能对公司业务造成不公平影响的报酬或其他利益等行为。对于违反本政策或违反反腐败贿赂相关规定的行为，公司将依法依规采取处置措施，追究相应人员的责任。

The Company prohibits all acts of corruption and bribery. No employee of the Company shall accept bribes from others, offer bribes to others, or facilitate bribery, nor shall any employee take advantage of his or her position to provide or accept remuneration or other benefits that may unfairly influence the Company's business. For acts that violate this policy or relevant anti-corruption and anti-bribery provisions, the Company shall take disciplinary measures in accordance with laws and regulations, and hold the responsible persons accountable.

5 自由和公平竞争 Free and Fair Competition

公司遵守国内及业务所在国家或地区反不正当竞争、反垄断相关法律法规，在业务活动中倡导自由公平的竞争原则，杜绝扰乱市场经济秩序的行为。公司禁止采取侵犯商业秘密、制造散播虚假信息等不正当、不合法或不道德的竞争行为，并自觉避免垄断行为的发生。

The Company complies with laws and regulations relating to anti-unfair competition and anti-monopoly in China and in the countries or regions where it conducts business, advocates the principles of free and fair competition in business activities, and prohibits acts that disrupt the market economic order. The Company prohibits unfair, illegal, or unethical competitive conduct such as infringement of trade secrets and fabrication or dissemination of false information, and conscientiously avoids the occurrence of monopolistic conduct.

6 避免利益冲突 Avoidance of Conflicts of Interest

公司员工应尽可能避免产生个人与公司的利益冲突。公司员工在面对利益冲突情形时应及时、主动向公司报告并回避，公司采取相关措施以尽可能规避利益冲突对企业与员工的影响。

Employees shall avoid, to the greatest extent possible, conflicts of interest between personal interests and those of the Company. When faced with a conflict of interest, employees shall promptly and proactively report the matter to the Company and recuse themselves. The Company shall take relevant measures to mitigate the impact of conflicts of interest on the Company and its employees to the greatest extent possible.

7 反洗钱 Anti-Money Laundering

公司坚决抵制洗钱或恐怖主义活动。全体员工应遵守国内及国际反洗钱相关法律法规，不得参与、协助或包庇任何洗钱、恐怖主义活动或其他违法犯罪活动。

The Company firmly resists money laundering or terrorist activities. All employees shall comply with domestic and international laws and regulations relating to anti-money laundering, and shall not participate in, facilitate, or harbor any money laundering, terrorist activities, or other illegal or criminal activities.

8 信息安全与隐私保护 Information Security and Privacy Protection

公司重视信息安全与隐私保护，通过完善信息安全管理机制、定期开展信息安全检查、推动信息安全文化建设等，加强信息安全防护，防止数据信息未经授权的访问、泄露、丢失和损坏，保护员工、客户及其他利益相关方的隐私。

The Company attaches importance to information security and privacy protection, and strengthens information security safeguards by improving information security management mechanisms, conducting regular information security inspections, and promoting the development of an information security culture, so as to prevent unauthorized access, disclosure, loss, and damage to data and information, and protect the privacy of employees, customers, and other stakeholders.

9 依法纳税 Tax Compliance

公司遵守国内及业务所在国家或地区有关税收的法律法规，依法履行纳税义务。

The Company complies with laws and regulations relating to taxation in China and in the countries or regions where it conducts business, and fulfills its tax obligations in accordance with the law.

10 保护环境 Environmental Protection

公司遵守环境保护相关法律法规，通过落实各项管理措施，减少污染物排放，加强水资源保护，提高资源利用效率，尽可能降低公司业务活动对环境造成的影响，并积极倡导环保理念，践行环境保护责任。公司积极应对气候变化，努力减少自身运营过程中的温室气体排放，同时也鼓励价值链合作伙伴推进绿色低碳转型。公司关注生态环境与生物多样性保护，尽量减少业务运营对生态环境及生物多样性的不利影响。

The Company complies with laws and regulations relating to environmental protection, reduces pollutant discharge, strengthens water resource conservation, and improves resource utilization efficiency through the implementation of various management measures, so as to minimize, to the greatest extent possible, the environmental impact of its business activities, and proactively advocates environmental protection concepts and fulfills its environmental protection responsibilities. The Company actively addresses climate change, endeavors to reduce greenhouse gas emissions from its own operations, and also encourages value chain partners to advance green and low-carbon transformation. The Company pays attention to ecological environment and biodiversity conservation, and minimizes the adverse impact of its business operations on the ecological environment and biodiversity.

11 保障劳工权益 Protection of Labor Rights and Interests

公司致力于打造多元、包容、公平、健康的职场，严格遵守国家有关劳动法律法规，充分保障员工的合法权益。公司在员工招聘、晋升、激励等方面为员工提供平等机会，反对因种族、宗教、年龄、性别、国籍等因素而采取差别对待；杜绝强迫劳动、雇佣童工、奴隶或奴役、贩卖人口行为；禁止任何形式的歧视、骚扰、暴力、侮辱、霸凌、诽谤等不当行为；尊重和保障员工所享有的获取劳动报酬、休息休假、结社自由与集体谈判等各项权利；建立健全职业健康与安全管理体系统，加强职业健康与安全风险的识别、评估与管控，保障员工身心健康与安全。

The Company is committed to fostering a diverse, inclusive, fair, and healthy workplace, strictly complies with relevant national labor laws and

regulations, and fully safeguards the lawful rights and interests of employees. The Company provides equal opportunities for employees in recruitment, promotion, incentives, and other processes, and opposes differential treatment based on race, religion, age, gender, nationality, or other factors. The Company eliminates forced labor, child labor, slavery or servitude, and human trafficking, and prohibits all forms of discrimination, harassment, violence, insults, bullying, defamation, and other inappropriate conduct. The Company respects and safeguards employees' rights to remuneration, rest and leave, freedom of association, and collective bargaining, and establishes and improves an occupational health and safety management system, strengthens the identification, assessment, and control of occupational health and safety risks, and protects the physical and mental health and safety of employees.

12 负责任采购 Responsible Procurement

公司倡导负责任采购原则，宣导并推动供应商遵循商业道德、公平竞争、人权保护、安全健康、环境保护、产品质量等方面的行为准则，负责任地开展业务。

The Company advocates the principles of responsible procurement, promotes and encourages suppliers to follow codes of conduct in respect of business ethics, fair competition, human rights protection, safety and health, environmental protection, and product quality, and to conduct business in a responsible manner.

13 社区参与 Community Engagement

公司重视社区沟通，接收并反馈重要的社区问题与投诉，致力于建立互信互利的社区关系。公司尊重与保护当地社区的原住民权益、文化习俗、文化遗产等，并尽可能地减少对当地社区的负面影响。公司关注社区发展，通过带动就业等支持社区经济发展，推动企业与社会共生共荣。

The Company values community communication, receives and responds to important community issues and complaints, and is committed to establishing community relationships of mutual trust and mutual benefit. The Company respects and protects the rights and interests of indigenous peoples, cultural customs, cultural heritage, and other aspects of local communities, and minimizes, to the greatest extent possible, adverse effects on local communities. The Company pays attention to community development, supports community economic development through

measures such as promoting employment, and advances the symbiotic co-prosperity of the enterprise and the community.

14 投诉与投诉人保护 Reporting and Whistleblower Protection

公司鼓励员工、供应商、客户等利益相关方向公司报告涉嫌违反法律法规、公司政策制度或本准则的行为，利益相关方可通过公司公开的投诉渠道提交匿名或实名报告，公司员工也可向公司有关部门进行反馈。公司采取投诉人保护举措，严格落实保密机制，加强投诉人保护。公司对打击报复行为秉持零容忍态度，尽可能保护投诉人免于遭受任何形式的打击报复。

The Company encourages employees, suppliers, customers, and other stakeholders to report suspected violations of laws and regulations, Company policies and rules, or this Code to the Company. Stakeholders may submit reports, whether anonymously or by name, through the Company's publicly available complaint channels. Company employees may also provide feedback to the relevant departments of the Company. The Company implements whistleblower protection measures, strictly enforces confidentiality mechanisms, and strengthens the protection of whistleblowers. The Company adopts a zero-tolerance approach towards retaliation and shall, to the greatest extent possible, protect whistleblowers from any form of retaliation.

15 责任追究 Accountability

若员工违反本准则中的行为，公司将根据相关管理规定对其采取相应的纪律处分及处罚措施，情形严重的，将依法追究其相关法律责任。

Where an employee violates this Code, the Company shall impose corresponding disciplinary actions and penalties in accordance with relevant management rules.

Where the circumstances are serious, the employee shall be held legally liable in accordance with the law.

16 生效 Effective Date

本准则自公布之日起生效。

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

2026年 月 日

XX XX, 2026