

厦门建发股份有限公司
商业行为准则
Xiamen C&D Inc.
Business Code of Conduct

1 目的 Purpose

公司坚持以高道德标准开展业务，遵守国内及业务所在国家或地区相关法律法规，支持和尊重相关国际公约与规范的要求，并积极履行企业社会责任，在业务发展过程中采取一系列可能的措施以最大化减轻对经济、环境和社会可能造成的任何负面影响。为了明确员工在业务发展过程中应遵守的行为规范，确保员工“知言行”的高度统一，从而贯彻落实公司“团结、敬业、诚信、进取”的企业精神，特制定本行为准则。

The company adheres to high ethical standards in conducting its business, complies with relevant domestic laws and regulations in the countries or regions where it operates, supports and respects the requirements of relevant international conventions and norms, and actively fulfills corporate social responsibilities. In the process of business development, the company takes a series of measures to minimize any negative impact on the economy, environment, and society. In order to clarify the behavioral norms that employees should adhere to in business development and ensure a high level of consistency between their knowledge, words, and actions, thereby implementing the company's corporate spirit of "unity, dedication, integrity, and aggressiveness," the company has formulated this Business Code of Conduct.

2 适用范围 Scope

本准则适用于建发股份及所属全资和控股公司，各单位可根据其实际情况及行业特点制定相应的商业行为准则，并需与本准则保持一致。

This Business Code of Conduct applies to C&D Inc. and its wholly-owned and holding companies. Each unit may develop corresponding business code of conduct based on its actual situation and industry characteristics, which must be consistent with this Code of Conduct.

3 诚信合规经营 Business Integrity and Compliance

- 3.1 公司全体员工应以合法合规、信守承诺、实事求是、诚信本分作为业务经营的基础，以合法、守信、真诚的标准做人做事，树立值得信赖的个人和企业形象。

All company employees are expected to conduct business based on legality, compliance, commitment, truthfulness, and integrity. They should behave and handle their work with principles of lawful, trustworthiness, and sincerity, establishing a reliable image for both themselves and the company.

4 员工基本行为准则 **Employees Code of Conduct**

- 4.1 “简单”是公司全体员工应秉持的人际原则。

"Simplicity" is the interpersonal principle that all employees of the company should uphold.

- 4.1.1 公司提倡心态阳光，坦诚沟通，就事论事，有话当面说，有话好好说，组织氛围简单和谐；反对表里不一，当面一套，背后一套，把简单的事情复杂化。

The company advocates for a positive mindset, open communication, addressing matters objectively, discussing issues face-to-face, speaking in a respectful manner, and fostering a simple and harmonious organizational atmosphere. It opposes duplicity, saying one thing to someone's face and another behind their back, and the tendency to unnecessarily complicate simple matters.

- 4.1.2 公司提倡为人处事客观公正，与同事真诚相处，专心工作，凭努力和实力获得认可；反对投机取巧，钻营人际，请托说情打招呼。

The company promotes objectivity and fairness in personal and professional interactions, fostering sincere relationships with colleagues, emphasizing work diligently, and earning recognition with effort and competence. It opposes opportunistic behavior, manipulating interpersonal relationships, and seeking favors or using personal connections for personal gain.

- 4.1.3 公司提倡为人处事客观公正，就事论事，反对偏激独断，对人不对事。

The company advocates for objectivity and fairness in dealing with others, focusing on the facts and opposing bias and unilateralism. It emphasizes addressing issues rather than targeting individuals.

- 4.2 “尊重”是公司全体员工应具备的基本素养。

"Respect" is a fundamental quality that all employees of the company should possess.

- 4.2.1 公司尊重人权，提倡同事之间人格平等，换位思考，互相尊重；反对出言不逊，伤人自尊，污辱他人人格。

The company respects human rights and advocates for equal dignity among colleagues, encouraging empathy and mutual respect. It opposes disrespectful language, undermining one's self-esteem, and insulting others' dignity.

- 4.2.2 公司提倡谦虚低调，戒骄戒躁，尊重客户，尊重对手；反对骄傲自满，狂妄自大，目中无人。

The company promotes humility and modesty, cautioning against arrogance and impatience. It promotes respect for customers and competitors while opposing pride, complacency, and a dismissive attitude towards others.

- 4.3 “负责”是公司全体员工应涵养的职业情操。

"Responsibility" is the professional ethics that all employees of the company should develop.

- 4.3.1 公司提倡珍惜平台，爱岗敬业，认真做好本职工作，对工作负责；反对工作马虎应付，得过且过，遇事敷衍塞责，推诿扯皮。

The company advocates for cherishing the platform, being dedicated to the job, performing one's duties conscientiously, and taking responsibility for the work. It opposes being careless and perfunctory in work, taking a lax attitude, complacent and evasive when faced with tasks, and shifting blame.

- 4.3.2 公司提倡遵纪守法，洁身自爱，做人做事有原则，有底线，对自己、对家庭、对公司负责；反对做违法乱纪和有悖社会公序良俗的事。

The company promotes adherence to laws and regulations, maintaining personal integrity, conducting oneself and handling matters with principles and boundaries, being accountable to oneself, family, and the company. It opposes engaging in illegal activities that violate social norms and public order.

- 4.4 “公司利益至上”是公司全体员工应该遵循的基本原则。

"Putting the company's interests first" is a fundamental principle that all employees of the company should adhere to.

4. 4. 1 公司提倡坚定维护公司利益，以公司大局为重；反对做任何有损公司利益的事，谋取个人私利。

The company advocates for firmly safeguarding the company's interests and prioritizing the overall goals of the company. It opposes any actions that may harm the company's interests or seek personal gains at the expense of the company.

4. 4. 2 公司提倡增强集体荣誉感，自觉维护公司形象；反对任何损害抹黑公司品牌声誉的言论和行为。

The company promotes enhancing the sense of collective honor and consciously maintaining the company's image. It opposes any remarks or actions that may harm or tarnish the reputation of the company's brand.

4. 5 “个人收入合法”是公司全体员工应坚守的道德底线。

"Personal income legality" is the ethical bottom line that all employees of the company should adhere to.

4. 5. 1 公司提倡合法合规，做阳光事，拿阳光钱；反对贪污受贿，吃回扣，拿不该拿的钱。

The company advocates for legality and compliance, doing things in a transparent manner and earning legitimate income. It opposes corruption, bribery, kickbacks, and any form of obtaining money that one should not rightfully possess.

4. 5. 2 公司提倡公私分明，把握原则界线，秉公行事；反对假公济私，利用职务便利给个人和亲友输送利益。

The company promotes maintaining a clear distinction between official business and private matters, upholding ethical principles and boundaries, and acting impartially. It opposes using public resources for personal gain and providing benefits to individuals and relatives through the abuse of one's position.

5 禁止内幕交易 **Prohibition of Insider Trading**

公司严禁内幕交易行为，全体员工应时刻遵守重要非公开信息及内幕交易的相关法律规定，在雇佣期间禁止利用从建发股份或第三方获得的内部信息进行或委托他人进行股票或其他证券交易。公司会对任何拥有建发股份内幕信息的人进行内幕信息及内幕信息知情人管理。

The company strictly prohibits insider trading activities. All employees are expected to comply with the relevant laws and regulations regarding critical non-public information and insider trading. During their

employment, it is restricted to utilize internal information obtained from C&D Inc. or third parties to engage in or instruct others to engage in stock or securities trading. The company implements management of insider information and individuals with knowledge of insider information.

6 利益冲突 **Conflict 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 should strive to avoid conflict of interest between their personal interests and those of the company to the greatest extent possible. In situations involving a conflict of interest, employees are expected to promptly and proactively report to the company, recuse themselves, and the company will take appropriate measures to mitigate the impact of the conflict on both the business and the employees.

7 反洗钱 **Anti-Money Laundering**

公司严格遵循国内外有关反洗钱的适用法律法规和监管要求，严禁员工参与或协助洗钱或相关违法犯罪活动。公司会根据适用的反洗钱相关法律法规，建立完善的内部控制政策和程序，持续保障公司对洗钱和恐怖主义融资风险的防范和管控，同时开展持续的反洗钱培训和宣传教育活动。

The company strictly adheres to applicable domestic and international laws, regulations, and regulatory requirements regarding anti-money laundering. Employees are prohibited from participating in or assisting in money laundering or related illegal activities. The company establishes comprehensive internal control policies and procedures in line with applicable anti-money laundering laws and regulations to continuously ensure the prevention and control of money laundering and terrorist financing risks. The company also conducts ongoing anti-money laundering training and awareness promotion campaigns.

8 自由和公平竞争 **Free and Fair Competition**

公司倡导自由竞争和公平竞争，严格遵守国家和业务发展所在地区相关反垄断和反不正当竞争的法规。公司禁止利用非法或不道德手段获取有关竞争对手、合作伙伴的信息，也禁止制造和散播有关竞争对手的虚假信息。

The company advocates free and fair competition and rigorously follows relevant regulations on anti-monopoly and anti-unfair competition in the

countries and regions where it operates the business. The company prohibits leveraging illegal or unethical means to obtain information about competitors or business partners, as well as the creation and dissemination of false information about competitors.

9 遵守国际业务规则 **International Business Rules Observation**

公司严格遵守国家和业务发展所在地区与出口和进口有关的法律、法规和许可程序。

The company strictly observes the laws, regulations, and licensing procedures related to import and export in the countries and regions where it conducts the business.

10 财产权益保护 **Protection of Property Rights and Interests**

10.1 公司尊重各方的财产权益（包括实物资产以及商业秘密、知识产权、个人信息等非实物资产）。在保护公司的财产不受他人侵犯的同时，也尊重他人的财产，不从事侵犯他人知识产权的商业活动。

The company respects the property rights of all parties, including tangible assets as well as intangible assets such as trade secrets, intellectual property, personal information, etc. While safeguarding the company's property from infringement by others, it also respects the property of others and refrain from engaging in business activities that violate the intellectual property rights of others.

10.2 公司严格遵守国家和业务发展所在地区关于信息保护的相关法律法规，仅出于合法目的而收集、使用和保留经营所需的员工、客户等利益相关方的信息（包括姓名/名称、地址、联系电话、网站使用信息等）。公司尊重利益相关方对其信息享有的合法权利，包括同意或拒绝公司收集或使用其信息以及查询、复制、更改、删除其信息的权利，且仅在法定情形或利益相关方明确同意或为利益相关方提供服务所必须的情形下向第三方合作伙伴披露相关信息。公司在收集和使用时，会告知当事人，并根据相关法规、业务需求在合理期限内保存信息。公司通过信息资产管理、信息安全检查等合理可行的措施尽力保护员工、客户、供应商等利益相关方的信息，防止未经授权的访问、泄露、丢失和损坏。

The company strictly adheres to relevant laws and regulations on information protection in the countries and regions where it operates. It only collects, uses, and retains information of stakeholders such as employees and customers for lawful purposes necessary for business operations (including names, addresses, contact numbers, website usage, etc.). The company respects the legal rights of stakeholders regarding their information, including the right to consent or refuse the collection or use of their information and the right to inquire, copy, modify, or delete their information. The company will only disclose relevant information to third-party partners in statutory situations, with explicit consent from

stakeholders, or when necessary to provide services to stakeholders. When collecting and using such information, the company informs the individuals involved and retains the information for a reasonable period in accordance with relevant regulations and business requirements. The company employs reasonable and feasible measures such as information asset management and security checks to protect the information of stakeholders like employees, customers, and suppliers, preventing unauthorized access, disclosure, loss, and damage.

11 **职业健康与安全 Occupational Health and Safety**

公司坚持“生命至上”的安全理念，将职业健康与安全视为最重大的责任。公司致力于为员工提供安全、健康、美好的工作环境。The company upholds the safety philosophy of "Life First" and considers occupational health and safety as its utmost responsibility. It is dedicated to providing employees with a safe, healthy, and pleasant working environment.

12 **保护环境 Environmental Protection**

公司积极应对气候变化，根据国家和业务发展所在地区环境保护政策开展业务环境影响评估，努力将业务对环境的影响降到最低。The company actively addresses climate change by conducting business environmental impact assessments per national and local environmental protection policies, striving to minimize the environmental impact of its operations.

13 **依法纳税 Taxation Compliance**

公司遵守国内及业务运营所在国家或地区的法律法规，依法履行纳税义务。The company complies with the laws and regulations of the countries or regions where it operates the business, fulfilling its tax obligations in accordance with the law.

14 **报告程序与投诉人保护 Reporting Procedures and Whistleblower Protection**

公司鼓励每位员工向公司报告涉嫌违反本行为准则、公司政策、程序或法律的行为，鼓励员工向主管进行反馈，或通过公司公开的投诉渠道提交匿名或实名报告。公司设置投诉人保护举措，对打击报复行为零容忍。The company encourages every employee to report any behavior that is suspected to be in violation of this code of conduct, company policies, procedures, or laws. Employees are supported to provide feedback to

their supervisors or submit anonymous or named reports through the company's designated complaint channels. The company has established measures to protect whistleblowers and has zero tolerance for retaliatory actions.

15 责任追究 **Accountability**

若员工违反本准则中的行为，公司将根据《员工诚信经营管理条例》《违规经营投资责任追究暂行办法》《奖惩管理规定》和相关管理办法进行相应的纪律处分及处罚，情节严重的，将追究其相关法律责任。

If an employee violates the behaviors outlined in this code of conduct, the company will take appropriate disciplinary actions and penalties in accordance with the "Employee Honest Operation Management Regulations," the "Provisional Measures for Accountability in Violations of Business Operations and Investment," the "Regulations on the Management of Rewards and Punishments," and other relevant management regulations. In cases of severe misconduct, legal liabilities may also be pursued.

16 生效 **Effective Date**

本准则自公布之日起生效。

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

英文版为中文版政策的翻译件，如与中文版存在不一致的，以中文版内容为准。

The English version serves as a translation copy of the Chinese version of the policy. In case of any inconsistencies between the English and Chinese versions, the Chinese version shall prevail.

厦门建发股份有限公司

Xiamen C&D Inc.

2024年2月26日

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