

华晟商业行为规范

Walsun Code of Business Conduct

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为实现华晟“成为世界一流贸易及服务提供商”的愿景，及践行“促进行业绿色可持续发展”的使命，帮助每位华晟员工遵循法律和道德标准，华晟特制定《华晟商业行为规范》（以下简称《规范》）。每位华晟员工均应学习、掌握并遵守《规范》中的各项要求。对于违反《规范》的行为，视为严重违反华晟规章制度，将要求严厉整改，直至解除劳动合同，触犯法律者还会受到法律的制裁。

To realize Walsun's vision of "becoming a world-class provider of trade and services" and to fulfill our mission of "promoting green and sustainable development in the industry," and to help every Walsun employee comply with legal and ethical standards, Walsun has formulated the Walsun Code of Business Conduct (the "Code"). Every Walsun employee shall study, understand, and comply with the requirements of this Code. Any violation of this Code will be deemed a serious violation of Walsun's rules and regulations and will be subject to strict corrective actions up to and including termination of employment. Where laws are violated, the violator will also be subject to legal sanctions.

一、 华晟商业行为责任

I. Responsibilities for Business Conduct

1、 对员工的责任

任何时候我们都将以正直、诚信、勤勉、廉洁、感恩的态度互相对待彼此。我们尊重来自于全世界不同个人的差异。入职决定应基于商业原因，例如资格、才能及成就，并且遵守国家和地方的劳动法规。

1. Responsibility to Employees

At all times, we treat one another with integrity, honesty, diligence, probity, and gratitude. We respect the differences among individuals from all over the world. Employment decisions shall be based on legitimate business considerations, such as qualifications, capabilities, and performance, and shall comply with applicable national and local labor laws and regulations.

2、 对客户和消费者的责任

我们要确保提供的产品和服务达到合同要求并努力超越客户预期。我们依靠诚信、廉洁与客户建立长期关系。所有的营销与广告应准确与真实，蓄意的误导性信息、对重要事实的遗漏或对竞争者出售的商品做出虚假的评判是永远不可接受的。我们合法地、道德地获取业务，杜绝贿赂和回扣。

2. Responsibility to Customers and Consumers

We shall ensure that the products and services we provide meet contractual requirements and strive to exceed customer expectations. We build long-term relationships with customers based on honesty and integrity. All marketing and advertising must be accurate and truthful. Deliberately misleading information, omission of material facts, or making false statements about competitors' products is never acceptable. We obtain business legally and ethically and prohibit bribery and kickbacks.

3、 对业务伙伴的责任

与其他公司建立良好关系为华晟提供了竞争的优势。但我们不与可能损害华晟声誉的公司及个人

做生意。我们将避免同故意或一再违反法律的公司做生意。所有与第三方的往来必须遵守法律以及华晟的政策。我们不借助第三方实施任何法律或《规范》所禁止的行为。

3. Responsibility to Business Partners

Building positive relationships with other companies gives Walsun a competitive advantage. However, we will not do business with companies or individuals that may damage Walsun's reputation. We will avoid doing business with companies that intentionally or repeatedly violate the law. All dealings with third parties must comply with applicable laws and Walsun policies. We shall not use third parties to engage in any conduct prohibited by law or by this Code.

4、对社会的责任

我们服务于社会，致力于以合理价格提供高品质的产品与服务，并且积极地支持我们所在的社会。我们尊重员工的权利，每一名华晟员工都有支持社会、慈善事业和政治组织以及选择理想的自由。

4. Responsibility to Society

We serve society and are committed to providing high-quality products and services at reasonable prices, and to actively supporting the communities in which we operate.

We respect employees' rights. Every Walsun employee has the freedom to support social, charitable, and political organizations and to make personal choices consistent with their ideals.

5、对环境的责任

我们重视环境保护，遵守我们从事业务活动所在国家的环境保护法律。华晟对保护环境承诺，将我们业务活动对环境的影响减至最小，同时作为化工产品的贸易和服务提供商，我们坚持以可持续的采购作为华晟的根本，并以促进行业绿色可持续发展的方式经营我们的业务。

5. Responsibility to the Environment

We value environmental protection and comply with environmental laws of the countries where we conduct business. Walsun is committed to protecting the environment and minimizing the environmental impact of our operations. As a provider of trade and services for chemical products, we uphold sustainable procurement as a fundamental principle and conduct our business in ways that promote green and sustainable development of the industry.

6、对政府的责任

作为一个有责任心的组织，遵守法律法规是我们的义务。

6. Responsibility to Government

As a responsible organization, it is our duty to comply with laws and regulations.

二、华晟商业行为规范

II. Walsun Business Conduct Standards

1、道德规范

1) 华晟所有员工，无论身处何地，处理问题时必须正直、诚信、廉洁，用正确的方式做正确的事情。

2) 华晟所有员工都应学习并践行厚道的方式处事做人：

a. 华晟通过为客户创造价值、让客户受益获取合理的利润，并与所有客户建立立足于长远发展的合作关系；

b. 所有决定须立足于华晟的长远利益，华晟提倡为他人着想，不让客户/合作伙伴吃亏。

3) 必须尊重同事、下属和第三方的权利，不得有歧视、侮辱、诽谤等行为，无论年龄、种族、性别、性倾向、肤色、信仰、宗教、发源国、婚姻、残障等。

1. Ethical Standards

- 1) All Walsun employees, wherever they are located, must act with integrity, honesty, and probity, and do the right thing in the right way.
- 2) All Walsun employees should learn and practice a fair, decent, and considerate way of conduct:
 - a. Walsun earns reasonable profits by creating value for customers and ensuring customers benefit, and builds cooperative relationships with all customers based on long-term development;
 - b. All decisions must be made in the best long-term interests of Walsun. Walsun advocates considering others and not putting customers/partners at a disadvantage.
- 3) We must respect the rights of colleagues, subordinates, and third parties, and must not engage in discrimination, insult, defamation, or similar conduct on the basis of age, race, gender, sexual orientation, skin color, beliefs, religion, country of origin, marital status, disability, or any other status.

2、利益冲突

- 1) 商业决策与行为必须基于华晟的长远利益，绝不能出于个人考虑或私下关系的动机。与潜在的或现在的供应商、承包商、客户、竞争者或政府管理者的私人关系，绝不能影响我们代表华晟的独立与明智的判断力。
- 2) 华晟所有员工不得私下为华晟的任何竞争者、客户、分销商或供应商工作或收取服务费。任何公司之外的活动必须与华晟的工作严格区分开，并且不应影响你在华晟的工作，且确保不会伤害华晟的业务活动。

2. Conflicts of Interest

- 1) Business decisions and conduct must be based on Walsun's long-term interests and must never be driven by personal considerations or private relationships. Personal relationships with prospective or existing suppliers, contractors, customers, competitors, or government officials must not affect our independent and prudent judgment on behalf of Walsun.
- 2) No Walsun employee may privately work for, or receive fees from, any of Walsun's competitors, customers, distributors, or suppliers. Any activities outside the company must be strictly separated from your work at Walsun, must not affect your work, and must not harm Walsun's business.

3、赠礼、业务招待及贿赂

- 1) 禁止行为：业务过程中不允许接受或给予回扣、个人佣金以及现金赠与(包括现金红包、存折、转账、线上支付等)；如有特殊情况，必须向公司汇报，由公司酌情决定。
- 2) 接受礼物：任何人不得接受过分慷慨的礼品。如有不能判断的特殊情况，应与部门负责人汇报，所有礼品均须上交公司。
- 3) 赠与礼品：为向商业合作伙伴等表示感谢，经部门负责人批准，一些商业情形可以赠与礼品，或为相关方支出适当的差旅、餐饮等费用。但所有这些必须是合法的、合理的。当单人单次赠与的礼品价值超过 1000 元时，必须经由部门负责人批准同意。

3. Gifts, Hospitality, and Bribery

- 1) Prohibited: In the course of business, it is not permitted to accept or give kickbacks, commissions, or cash gifts (including cash red envelopes, passbooks, bank transfers, online payments, etc.). If there are exceptional circumstances, they must be reported to the company for a case-by-case decision.
- 2) Accepting gifts: No one may accept excessively generous gifts. If you are unsure in a special situation, report to your department head. All gifts must be turned over to the company.
- 3) Giving gifts: To express appreciation to business partners, with approval from the department head, gifts

may be given in certain business situations, or appropriate travel, meals, and other expenses may be paid for relevant parties. All such arrangements must be legal and reasonable. If the value of a gift given to a single person in a single instance exceeds RMB 1,000, approval from the department head is required.

4、保护华晟客户、供应商和其他相关方信息

1) 华晟员工不得将华晟客户、供应商以及其他相关方的机密信息或版权信息在未经对方许可的情况下公布给其他人。

2) 华晟员工在存储信息时必须采用适当的步骤——包括设置安全文档，对电脑或电子媒体设置使用权限，或采用适当的处理策略——防止其他人未经授权使用这些信息。

4. Protecting Information of Walsun Customers, Suppliers, and Other Relevant Parties

1) *Walsun employees must not disclose confidential information or copyrighted information of Walsun customers, suppliers, or other relevant parties to anyone without the other party's permission.*

2) *When storing information, Walsun employees must take appropriate measures—including securing documents, setting access permissions for computers or electronic media, or applying appropriate handling policies—to prevent unauthorized access or use by others.*

5、收集竞争信息

1) 华晟在收集竞争信息时，必须是合法的。不得侵犯竞争对手的权利，不得披露竞争对手的机密或专有信息。

2) 可以使用公开的信息，如年报、公司网站和出版物、公开演讲和公开营销文档、期刊和杂志上的文章、及其他公共媒体上的申报项目。

3) 如果竞争对手或代表竞争对手的第三方在获取华晟信息时的某些行为被认为是不适当的或不道德的，那么同类行为也应该避免。

5. Gathering Competitive Information

1) *Walsun must collect competitive information legally. We must not infringe competitors' rights, nor disclose competitors' confidential or proprietary information.*

2) *Publicly available information may be used, such as annual reports, company websites and publications, public speeches and marketing materials, articles in journals and magazines, and filings or projects announced through other public media.*

3) *If certain actions by a competitor or a third party representing a competitor in obtaining Walsun information are considered improper or unethical, similar actions should likewise be avoided.*

6、诚信公平交易

1) 华晟任何人不得通过操纵、隐瞒、滥用特权信息，歪曲事实，或以其他不公平的方式获取不当利益。

2) 华晟严格遵守所有适用的公平竞争的相关法律法规，保证商业公正、公平。

6. Integrity and Fair Dealing

1) *No one at Walsun may obtain improper benefits through manipulation, concealment, misuse of privileged information, misrepresentation of facts, or any other unfair means.*

2) *Walsun strictly complies with all applicable fair competition laws and regulations to ensure integrity and fairness in business.*

7、业务采购

- 1) 采购决定必须从华晟的最长远利益出发。供应商赢得华晟的生意是基于其产品或服务的适用性、价格、交付时间及质量等。
- 2) 选择供应商需按相关要求对供应商进行评定审核，审核未合格的供应商不能选择为合作方；
- 3) 任何人不得私下与供应商和/或客户签订任何合同或协议。

7. Business Procurement

- 1) *Procurement decisions must be made in Walsun's best long-term interests. Suppliers win Walsun's business based on the suitability of their products or services, price, delivery time, quality, and other factors.*
- 2) *Supplier selection shall follow the required supplier evaluation and audit process; suppliers that fail the audit may not be selected as partners;*
- 3) *No one may privately sign any contract or agreement with suppliers and/or customers.*

8、商业记录维护

- 1) 华晟需要诚实、准确地记录和上报信息，以便进行负责任的业务决策。
- 2) 按照制度与流程来记录、保存华晟业务记录。只有过了保存的有效期，记录才能销毁。但在未决、诉讼、政府咨询、等待传票或者其他信息查询下，此类记录无论是否过了保存有效期都不得抛弃或销毁。
- 3) 华晟员工永远不得以非正当的理由销毁、更改、隐瞒任何记录，或者不得以个人或联合其他人试图影响、阻止任何正式调查。

8. Maintaining Business Records

- 1) *Walsun must honestly and accurately record and report information in order to make responsible business decisions.*
- 2) *Record and retain Walsun business records in accordance with applicable systems and processes. Records may be destroyed only after the retention period has expired. However, in the case of pending matters, litigation, government inquiries, subpoenas, or other information requests, such records must not be discarded or destroyed, regardless of whether the retention period has expired.*
- 3) *Walsun employees must never improperly destroy, alter, or conceal any records, nor personally or jointly attempt to influence or obstruct any official investigation.*

三、豁免

《规范》适用于所有华晟员工，《规范》的任何一部分都不得豁免。除非经过股东会的投票决定某项内容确实需要豁免，同时豁免该项目可以保护华晟。

III. Waivers

This Code applies to all Walsun employees, and no part of this Code may be waived. A waiver may be granted only if the shareholders' meeting votes to determine that a specific provision truly requires a waiver and that granting such waiver would protect Walsun.

四、违反《规范》的举报渠道和方式

- 1、为搭建畅通的投诉举报渠道，确保本《规范》落到实处，公司指定由总经理领导的绿色可持续发展委员会为专项举报渠道，委员会负责人陈超，举报专线：13517470959，举报专用邮箱 channel08@qq.com；总经理手机号：13507319326，总经理邮箱：yuguo@china.com；
- 2、如果您发现了使您产生疑虑的行为或者有违反《规范》嫌疑的行为，请立即提出相关问题，这样可以使公司有机会赶在该问题构成违反法律的事实或对健康、安全及公司的声誉构成威胁之前处理和纠正该问题。
- 3、公司严肃认真地对待所有举报，并承诺对所有举报进行保密和全面调查。因某项潜在违反《规范》行为而受到调查的员工在调查人员做出任何最终决定之前可以申诉。
- 4、《规范》调查可能涉及任何员工，如果涉及到您，需无条件予以全面合作并完全而诚实地回答

所有问题。

5、公司确保员工不会因任何举报或提供真实信息而遭到报复。员工诚实提出过某项疑虑或参与过某项调查，不得成为对其采取任何不利行动的理由，这些行动包括开除、降职、停职、剥夺权益、威胁、骚扰或歧视。如果您认为某位员工或管理层对您实施了打击报复，请向绿色可持续发展委员会或总经理直接提出。

IV. Reporting Channels and Methods for Violations of this Code

- 1. To establish accessible reporting channels and ensure implementation of this Code, the company designates the Green & Sustainable Development Committee, led by the General Manager, as the dedicated reporting channel. Committee head: Chen Chao. Hotline: 13517470959. Dedicated email: channel08@qq.com. General Manager mobile: 13507319326. General Manager email: yuguo@china.com;*
- 2. If you discover conduct that raises concerns or is suspected of violating this Code, please raise the issue immediately so that the company has the opportunity to address and correct it before it becomes a legal violation or threatens health, safety, or the company's reputation.*
- 3. The company treats all reports seriously and commits to keeping reports confidential and conducting a full investigation. An employee investigated for a potential violation of this Code may appeal before investigators make any final decision.*
- 4. Code investigations may involve any employee. If you are involved, you must cooperate unconditionally, fully, and honestly answer all questions.*
- 5. The company ensures that employees will not suffer retaliation for making a report or providing truthful information. An employee's good-faith concern or participation in an investigation must not be a reason for any adverse action, including termination, demotion, suspension, deprivation of rights/benefits, threats, harassment, or discrimination. If you believe you have been retaliated against by any employee or management, please report directly to the Green & Sustainable Development Committee or the General Manager.*

五、 结语

1、本《规范》自公布之日开始执行。本《规范》的执行，旨在确保华晟员工在公司内部的行为方式以及与公司外部人士打交道的方式均保持一贯性。公司将对所有华晟员工进行培训学习，保证所有华晟员工对《规范》的认知、理解和巩固。未能阅读或理解《规范》不能成为华晟员工不遵守《规范》的理由。华晟保留修改、修订或终止本《规范》的权利。

2、如部分内容与《华晟员工手册》有冲突时，以《华晟员工手册》的条款为准。

V. Closing

- 1. This Code takes effect on the date of publication. Its implementation is intended to ensure consistency in how Walsun employees conduct themselves internally and in dealings with external parties. The company will provide training for all Walsun employees to ensure awareness, understanding, and reinforcement of the Code. Failure to read or understand the Code is not a reason for non-compliance. Walsun reserves the right to modify, revise, or terminate this Code.*
- 2. Where any part of this Code conflicts with the Walsun Employee Handbook, the provisions of the Walsun Employee Handbook shall prevail.*