

Snibe Anti-bribery Policy



SNIBE ANTI-BRIBERY POLICY

Bribery raises serious moral, economic and political issues, undermines good governance, hinders economic development and distorts fair competition globally. It also hinders the fair and efficient operation of the market, increases business costs the cost of goods and services, as well as the uncertainty in commercial transactions, meanwhile it reduces the quality of goods and services, which may lead to losses of life and property and seriously undermines the development of Snibe competitiveness.

In order to prevent and eliminate bribery, most countries where Snibe operates its business have implemented anti-corruption and anti-bribery laws and regulations, and stipulate that bribery may be judged as a crime if it meets the legal requirements.

In order to conduct business in accordance with the principles of fairness, integrity, compliance and transparency globally, Snibe insists on a "**zero tolerance**" attitude towards any form of bribery and firmly prohibits any form of bribery in the process of conducting business, whether in the public and private sectors. Any bribery behavior by all directors, managers, employees and contractors related Snibe (hereinafter collectively referred to as "related personnel") or third-party partners is prohibited. Snibe's related personnel or third-party partners shall not directly or indirectly offer, promise, give, grant money or any other equivalent monetary benefit to any person in the public sector or private enterprise, in order to unduly influence the legitimate duties of the recipient, to obtain or retain other illegal interests.

Snibe is committed to making its global operations strictly comply with applicable anti-corruption and anti-bribery laws and regulations and ensuring that transactions conducted by anyone acting on behalf of Snibe (including third parties) comply with applicable anti-corruption and anti-bribery laws and regulations. Compliance with Snibe' anti-bribery program and the laws and regulations on which it is based



is a basic requirement for all Snibe employees and internal departments.

To this end, Snibe has developed a series of norms, processes and guidelines to reduce the risk of bribery, further making fairness, integrity and "doing the right thing" an integral part of corporate compliance culture, and on a global scale Improve company credibility. Snibe will take effective measures to ensure that Snibe' partners and third parties know that Snibe expects them to comply with relevant anti-bribery compliance requirements when performing any actions or handling any business.

Anti-corruption and anti-bribery laws and regulations include China's anti-corruption and anti-bribery laws and regulations, the United States' Foreign Corrupt Practices Act (FCPA), the United Kingdom's Anti-Bribery Act (UKBA), and other anti-corruption and anti-bribery laws and regulations of the countries where business is conducted. .

This policy applies to all directors, employees, contractors of Snibe's subsidiaries, branches and affiliates, as well as Snibe's business partners.

Violations of the above laws and regulations will result in severe criminal and civil penalties, including but not limited to fines, imprisonment, and other sanctions or penalties that may affect Snibe' global business. Snibe will not tolerate any violations of this policy, the above-mentioned laws and regulations, and Snibe 's relevant processes and requirements. Employees who violate this policy may face disciplinary punishment and/or termination of their employment contract.

The board of directors, board of supervisors and compliance management committee of Snibe fully support the anti-bribery compliance project.

Snibe is committed to providing adequate resources and professional support to ensure compliance with applicable anti-corruption and anti-bribery laws and regulations. We deeply understand that compliance creates value, and require every



employee and partner of Snibe to fully support this work, create value for Snibe, and take compliance responsibilities seriously. The success of Snibe depends on the full cooperation and support of every employee and partner for this important mission. Snibe will publish and implement comprehensive new anti-bribery compliance measures, including but not limited to the revised "Snibe Anti-Bribery Compliance Manual", anti-bribery compliance management specifications in various fields, a series of specific operational guidelines and anti-bribery Compliance training.

The requirements of the Snibe Anti-Bribery Compliance Policy are as follows:

- All related personnel work for or cooperate with Snibe must commit to abide by anti-bribery compliance policies.
- All related personnel and business partners of Snibe must comply with applicable anti-corruption and anti-bribery laws and regulations, as well as all relevant policies, norms and procedures adopted by Snibe.
- All related personnel and business partners cooperates with Snibe must fully understand how anti-corruption and anti-bribery laws and regulations apply to their work, fully and actively participate in all compliance training, and consult any compliance issues or issues through effective channels. Report potential violations, ensure that records, data and information in the course of business are true, accurate and complete, document the above information, and raise questions with the Snibe Compliance Management Committee when you are unsure which requirements may apply.
- Exemptions from this policy require prior legal advice and approval from the Compliance Management Committee.

All related personnel are required to report any anti-bribery compliance issues or potential violations. You may directly report any potential violations, your direct



manager, department head or other senior manager, or to the Internal Audit Department or anonymously, and in any case there will be no retaliation for reporting actual or suspected violations.

Report Hotline

Snibe relies on all business partners to help us prevent, detect bribery and any other misconduct. Any person wishes to seek advice on anti-corruption compliance or report the potential violations against anti-bribery policy, can seek help through the following address, anonymously or non-anonymously:

Email: audit@snibe.cn

Tel: 0755-26706462 (Mainland China)