

商业行为准则

华润三九践行华润诚信核心价值观，诚信于股东、诚信于客户、诚信于员工、诚信于社会。

华润三九经理人及员工严格遵守《华润三九员工廉洁从业规定》、《华润三九合规“五诫”》，遵纪守法，强化自律，廉洁从业，规范经营。

严守商业道德，悉心维护客户和消费者权益，开展公平竞争，努力提供优质、环保、安全的产品和服务，精诚与客户合作，为客户创造价值，与客户共同成长。坚持不懈反对“四风”，厉行节约，反对浪费，求真务实，克己奉公，精益求精，追求卓越，以出色的业绩回报股东，回报社会。

华润三九与合作伙伴之间是简单的企业之间的合作，不存在任何个人利益动机。

华润三九员工追逐阳光下的公司利润和个人价值，以廉为荣、以贪为耻，忠于职责，恪守《华润三九员工廉洁从业规定》和《华润三九合规“五诫”》。其中，针对贪污腐败相关不正当行为，公司根据事件调查结果和相关规定，对违规者予以处分（包括但不限于撤职、解除劳动合同等）。

我们要求公司全体员工，包含兼职、全职以及合同工，履行以下行为准则：

● 我们坚守诚信底线

1、反垄断与反不正当竞争

诚实守信是华润的核心价值观，是华润建基立业的根本。需要确保我们的经营不存在垄断、贿赂、欺诈、不正当竞争等行为，并遵守适用的反垄断、反不正当竞争相关的法律法规。

我们不允许出现如下行为：

- 向竞争对手透露公司的定价信息、商业合作伙伴往来情况、经营安排等。
- 以偷窃、侵入、偷听、贿赂、胁迫等不正当的手段获取竞争对手的情报。
- 恶意中伤、造谣竞争对手。
- 参与垄断协议的签订与执行。
- 滥用市场支配地位开展的一系列违规行为。
- 在产品设计和推广时，盗用竞争对手商标、专利。

2、反商业贿赂

我们凭借卓越的团队、一流的产品和服务、良好的社会责任担当和声誉口碑开展合作，赢得商业机会。我们不得直接或间接地给予或接受任何形式的贿赂、腐败、回扣或疏通费。

我们不允许出现如下行为：

- 提供、接受、索求任何形式的贿赂、腐败、回扣或疏通费。
- 利用第三方提供、接受、索求任何形式的贿赂、腐败、回扣或疏通费。

3、反洗钱

我们严格遵循国内外有关反洗钱的适用法律及法规，我们不允许出现如下行为：

- 参与洗钱活动或帮助他人进行洗钱活动。
- 以任何方式阻碍官方调查。
- 瞒报、漏报、谎报等包庇洗钱行为。
- 自行调查疑似洗钱案件，拒不及时向上级及华润有关部门报告。

4、礼物及招待

我们必须谨慎看待商业活动中的礼物及招待。在与政府、主管/监管机构、客户、供应商及其他合作伙伴进行接触时，适当的礼物及餐饮娱乐招待有助于关系的维护或业务的达成，但是不恰当的礼物及招待可能引发利益冲突、不正当付款、回扣或腐败行为。

我们不允许出现如下行为：提供、接受任何形式的现金及现金等价物，包括通过中间人提供或接受，提供、接受超过华润及对方公司标准的礼物以及招待，包括通过中间人提供或接受提供产品及服务。

5、提供产品及服务

我们必须一如既往的为客户提供令人满意的产品和服务，同时以国际化水平的高标准要求自身，以此赢得并保有客户。

我们不允许出现如下行为:

- 违反业务操作指引，导致产品及服务质量下降。
- 虚假宣传、夸大宣传、诱导式销售。
- 对客户反映的产品及服务质量问题持消极态度，不积极主动处理。

6、用户数据使用

我们严格遵循所有有关隐私和个人信息保护的适用法律及法规。我们仅以合法经营及合法目的收集所必需的客户信息及有关个人信息，并且始终坚守商业伦理及契约精神，妥善保护用户的隐私数据。

我们不允许出现如下行为:

- 披露客户委托给公司的隐私数据，除非经授权允许或根据相关法律法规存在披露的义务。
- 售卖、转让客户信息及有关个人信息。

7、与政府及监管机构沟通

我们在与政府及监管机构沟通时，不仅要遵循适用的法律及法规，还需严格遵守政府及监管机构的道德标准与要求。

8、对商业合作伙伴的合规要求

我们谨慎选择具备合规管理基础及良好合规形象的供应商、代理人等商业合作伙伴，确保其在与华润合作的过程中，其行事方式不与华润价值观、合规理念发生冲突。

● 我们尊重公平对待员工

1、保持良好工作环境

我们致力于为全体员工营造一个健康、安全、融洽的工作环境。我们严格遵守公司纪律，举止得体、着装规范、语言文明、务实协作，并保持工作场所的整洁有序。

我们不允许出现如下行为:

- 违反公司纪律以及各项规章制度。
- 不服从工作安排，消极怠工，糊弄应付。
- 扰乱工作秩序，妨碍他人正常工作。
- 损坏工作场所设施设备。
- 酒精、药品滥用等不当行为，影响自身及他人正常工作。

2、保护员工权益

我们确保我们的商业活动与《联合国全球契约十项原则》保持一致，尊重每一位员工的合法权益，不容许任何侵犯员工合法权益的行为发生。

我们不允许出现如下行为:

- 任何形式的人口贩运。
- 非合理情景下，强制他人劳动。
- 强迫或容许童工劳动（禁止雇佣低于当地法定年龄的童工从事劳动）。
- 违反业务所在国家/地区的劳动法。
- 未经同意将员工个人隐私信息公开或传递给不相关的第三方。

3、反歧视与骚扰

每一位都享有平等的人权及尊严，不得因种族、民族、宗教信仰、性别、社会身份、地位、生理健康程度、性取向等差异因素而产生歧视或骚扰行为，亦不得容忍、助长此类行为，

我们倡导如下行为:以较高的道德标准要求自身，平等对待身边以较高的道德标准要求自身，每一位同事。对于在工作环境中带有歧视与骚扰意味的行为，勇于进行制止，并向合规管理部门报告。我们亦将对所有的员工申诉与反馈进行严肃调查，若情况属实，我们将对相关人员进行严肃处理。公司每年开展面向全体员工的商业行为准则相关培训，内容包括反歧视与骚扰等，倡导多元包容的工作环境。

我们不允许出现如下行为:

- 对他人进行侮辱、胁迫、挑衅、辱骂及其他敌意行为。

- 针对他人的种族、民族、宗教信仰、性别、社会身份、地位、生理健康程度、性取向等因素，发表不合适言论。
- 展示或散播有歧视意味的信息。
- 传播可能对他人造成伤害的谣言。
- 对员工进行肢体或言语骚扰。

4、平等工作机会

我们始终坚持以同工同酬、平等公正的原则提供工作机会和工作条件，员工的选、任、用、留应基于公司发展需要、岗位的任职标准以及员工的工作能力与品德来决定。我们应客观公正地评价每一位同事或候选人，不得因性别、年龄、种族、民族宗教信仰、社会身份、地位、生理健康程度性取向等因素，在对员工进行选、任、用、留时进行区别对待。

5、自由结社和集体谈判

我们尊重员工参加、组建或者不参加组织工会的权利，而无需担心受到报复、威胁或骚扰。如果员工加入经法律认可的组织工会，我们致力于与他们自由选择的代表积极沟通开展建设性的对话。

● 我们保护公司权益

1、记录与报告

我们以透明和诚信的方式经营业务，接受社会与相关机构的监督。我们有责任和义务确保所经手业务的信息记录是准确、完整且易于理解的。

2、使用公司资产

我们知晓公司资产仅用于公司业务用途，不容许因个人私利或任何非法目的、未经授权使用、侵占公司资产，严厉禁止窃、偷窃等行为。

3、对外沟通与披露

我们严禁个人在外部社交媒体上发布超出中立、涉及华润的业务信息;媒体问题将由指定人员进行解答，任何员工或相关人员不可随意披露内部信息。在以下情况下，对外披露信息必须征求上级领导同意

4、获取与使用内幕信息

我们时刻遵守重要非公开信息及内幕交易的相关法律规定，禁止进行在未被广泛公开的重要信息(内部信息)的基础上的证券买卖行为，所有员工在雇佣期间禁止利用从华润三九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，也不得向其他方披露此类信息。

5、避免利益冲突

当个人利益或行为妨碍或可能妨碍个人在华润履行或应该为华润履行的职责时，即存在利益冲突。

我们不得从事与华润存在利益冲突的活动，应在履职过程中，主动识别并解决潜在利益冲突

6、保护公司信息安全

我们严格遵守华润信息安全政策以处理不同类型信息，并妥当保管经营活动中的各类信息，谨防信息丢失或泄露。员工在日常工作中必须认识到数据安全的重要性，以免无意丢失或泄露涉密信息或个人数据。

● 我们关心社会与公众

1、保护环境

我们将保护环境作为企业的重要职责之一，贯穿于所有的经营活动，应该履行保护环境的义务，在本职工作中维护周边环境，避免或减少 由于生产经营活动对周边环境产生的不利影响。我们要求：

- 通过防止疾病、伤害和污染事件的发生最大限度地减少经营活动给环境带来的影响。
- 积极倡导并利用各种机会扩大可持续发展的空间，提高能源使用效率、改进安保措施、减少有害污染物的排放。
- 我们承诺无论在何地开展经营活动，都会遵守有关健康、安全、环境和法律方面的要求。

2、遵纪守法

每一位华润人应遵守中华人民共和国适用于公司的法律、法规和政策。除此之外，由于业务开展范围会涉及境外，我们承诺在履行职责的过程中遵守经营活动所在国家和地区的相关法律法规政策。

3、道德与诚信

道德是公民与企业在开展经营活动时的无形底线，每位员工应该在开展日常经营活动时遵循道德与诚信的最高标准，以合乎道德的方式公开透明地开展商业活动。任何员工不应该在任何商业行为中扭曲事实为自身或他人谋取任何不正当利益，任何违反道德与诚信的行为将会损害公司的声誉与利益。

4、慈善与公益

我们倡导员工在力所能及范围内参与公司或社会组织的慈善与公益活动。但员工不得私自以公司名义进行任何慈善活动，也不能以公司包括时间在内的任何资产违规参与公益活动。本公司慈善与公益活动严格受到相关部门管控，要求必须提交预算和合规流程，并核对慈善与公益活动的金额一致性，并对已完成的活动进行发票核验，确保慈善与公益活动的全流程始终合规。

● 对不合规行为的报告

1、举报途径

当您发现不符合《守则》行为要求的情况时，有责任与义务向以下人士或部门进行报告：

- 您的上级领导
- 您所在单位的合规管理部门
- 您所在单位的监察部门
- 您所在单位的分管领导或负责人
- 上级单位相应职能的管理部门
- 集团合规管理部门
- 集团监察部门

如您担心因为利益冲突等因素，报告事项无法得到妥善处理，可直接向集团合规管理部门或集团监察部门报告，我们将会保密处理所有报告，并按照法律、公司政策规定进行跟进处理，并且报告至适当的机构和组织。

2、反报复

严禁对任何以善意方式寻求建议、提出疑虑、举报违纪行为或在调查中提供信息的员工进行报复。报复的示例包括：否决福利、解雇、降职、停工、威胁、骚扰或歧视。

如果任何个人(不论其在华润的职位如何)对以善意方式如实举报潜在违规行为的员工实施报复，即使在调查后发现不存在违规行为，公司也将采取适当的措施。然而，如果有人故意虚假举报，公司将作出相应的处理。

如果您认为您或其他同事因以善意方式寻求建议、提出疑虑、举报违纪行为或在调查中提供信息而遭到报复，您应立即联系集团合规管理部门或集团监察部门。

Code of Business Conduct

China Resources Sanjiu practices the core value of integrity of China Resources, being honest with shareholders, customers, employees and the society.

The managers and employees of China Resources Sanjiu strictly abide by the "Regulations on the Clean and Honest Practice of Employees of China Resources Sanjiu" and the "Five Commandments for Compliance of China Resources Sanjiu". They abide by laws and disciplines, strengthen self-discipline, practice clean and honest work, and conduct standardized business operations.

They strictly adhere to business ethics, carefully safeguard the rights and interests of customers and consumers, carry out fair competition, strive to provide high-quality, environmentally friendly and safe products and services, sincerely cooperate with customers, create value for them and grow together with them. They persevere in opposing the "Four Forms of Decadence", practice strict economy, oppose waste, seek truth and pragmatism, serve the public wholeheartedly, constantly strive for perfection and pursue excellence, and return excellent performance to shareholders and the society.

The cooperation between China Resources Sanjiu and its partners is simply a cooperation between enterprises, without any personal interest motives.

The employees of China Resources Sanjiu pursue the company's profits and personal values in the sunlight, regard honesty as an honor and corruption as a disgrace, are loyal to their duties and abide by the "Regulations on the Clean and Honest Practice of Employees of China Resources Sanjiu" and the "Five Commandments for Compliance of China Resources Sanjiu". Based on investigation findings and relevant regulations, disciplinary actions shall be imposed on violators, including but not limited to removal from post and termination of labor contracts.

We require all employees, including full-time, part-time, and contractors, to follow the corresponding Code of the Conduct:

1. We adhere to the bottom line of integrity

- (1) Anti-monopoly and anti-unfair competition

Honesty and trustworthiness are the core values of China Resources and the foundation for China Resources to build its business. It is necessary to ensure that our business operations do not involve monopoly, bribery, fraud, unfair competition and other behaviors, and comply with applicable anti-monopoly and anti-unfair competition laws and regulations.

The following behaviors are not allowed:

- Revealing the company's pricing information, business partner transactions, business arrangements, etc. to competitors.
- Obtaining competitors' intelligence by improper means such as theft, intrusion, eavesdropping, bribery, coercion, etc.
- Maliciously slandering and spreading rumors about competitors.
- Participating in the signing and implementation of monopoly agreements.
- A series of illegal acts carried out by abusing the dominant market position.

- Pirating competitors' trademarks and patents when designing and promoting products.

(2) Anti-bribery

We win business opportunities through excellent teams, first-class products and services, good social responsibility and reputation. We must not directly or indirectly give or receive any form of bribery, corruption, kickbacks or facilitation payments.

The following behaviors are not allowed:

- Providing, accepting or soliciting any form of bribery, corruption, kickbacks or facilitation payments.
- Using third parties to provide, accepting or soliciting any form of bribery, corruption, kickbacks or facilitation payments.

(3) Anti-money laundering

We strictly follow the applicable laws and regulations on anti-money laundering at home and abroad.

The following behaviors are not allowed:

- Participating in money laundering activities or helping others conduct money laundering activities.
- Hindering official investigations in any way.
- Covering up money laundering behaviors by concealing, omitting or falsely reporting.
- Conducting self-investigations on suspected money laundering cases and refusing to report to superiors and relevant departments of China Resources in a timely manner.

(4) Gifts and entertainment

We must view gifts and entertainment in business activities with caution. When contacting with the government, competent/regulatory authorities, customers, suppliers and other partners, appropriate gifts and catering and entertainment can help maintain relationships or facilitate business transactions. However, inappropriate gifts and entertainment may lead to conflicts of interest, improper payments, kickbacks or corrupt behaviors.

The following behaviors are not allowed:

- Providing or accepting any form of cash and cash equivalents, including through intermediaries, providing or accepting gifts and entertainment that exceed the standards of China Resources and the other party's company, including through intermediaries, providing products and services.

(5) Provision of products and services

We must always provide customers with satisfactory products and services, and at the same time require ourselves with high international standards to win and retain customers.

The following behaviors are not allowed:

- Violating business operation guidelines, resulting in a decline in the quality of products and services.
- False propaganda, exaggerated propaganda, and induced sales.
- Adopting a negative attitude towards the quality problems of products and services reported by customers and not actively handling them.

(6) Use of user data

We strictly follow all applicable laws and regulations on privacy and personal information protection. We only collect necessary customer information and relevant personal information for legal business and legal purposes, and always adhere to business ethics and the spirit of contract to properly protect users' privacy data.

The following behaviors are not allowed:

- Disclosing the privacy data entrusted to the company by customers, unless authorized or obliged to disclose according to relevant laws and regulations.

- Selling or transferring customer information and relevant personal information.

(7) Communication with the government and regulatory authorities

When communicating with the government and regulatory authorities, we should not only comply with applicable laws and regulations, but also strictly abide by the ethical standards and requirements of the government and regulatory authorities.

(8) Compliance requirements for business partners

We carefully select business partners such as suppliers and agents with a foundation for compliance management and a good compliance image to ensure that their ways of doing business in the process of cooperation with China Resources do not conflict with the values and compliance concepts of China Resources.

2. We respect and treat employees fairly

(1) Maintain a good working environment

We are committed to creating a healthy, safe and harmonious working environment for all employees. We strictly abide by company discipline, behave appropriately, dress properly, use civilized language, be practical and cooperative, and keep the workplace clean and orderly.

The following behaviors are not allowed:

- Violating company discipline and various rules and regulations.
- Disobeying work arrangements, being slack in work, muddling through or coping perfunctorily.
- Disrupting the work order and interfering with the normal work of others.
- Damaging facilities and equipment in the workplace.
- Abusing alcohol, drugs and other improper behaviors that affect the normal work of oneself and others.

(2) Protect employees' rights and interests

We ensure that our business activities are consistent with *the Ten Principles of the United Nations Global Compact*, respect the legitimate rights and interests of every employee, and do not allow any violation of the legitimate rights and interests of employees to occur. We respect the rights of employees to join, form, or not to join organizations and their right to collective bargaining. If employees become members of legally recognized groups, we are committed to actively communicating with the representatives they freely choose.

The following behaviors are not allowed:

- Human-trafficking
- Forcing others to work under unreasonable circumstances.
- Forcing or allowing child labor (it is prohibited to employ children below the local legal working age).
- Violating the labor laws of the country/region where the business is located.
- Any form of harassment, including sexual harassment and non-sexual harassment
- Disclosing or passing on employees' personal privacy information to irrelevant third parties without consent.

(3) Anti-discrimination and anti-harassment

Everyone enjoys equal human rights and dignity. We hold a zero tolerance attitude for discrimination. Discrimination or harassment shall not occur due to differences in race, ethnicity, religious belief, gender, social identity, status, physical health, sexual orientation and other factors, nor shall such behaviors be tolerated or encouraged.

We advocate the following behaviors: To uphold the highest business ethics to ourselves and treat every colleague equally and demand oneself with high moral standards.

For behaviors with discriminatory and harassing implications in the working environment, have the courage to stop them and report them to the compliance management department. We will also seriously investigate all employee complaints and feedback, if the case is true, we will deal with the relevant people seriously.

The Company conducts annual training for all employees on the code of Business conduct, including anti-discrimination and harassment, and advocating a diverse and inclusive working environment.

The following behaviors are not allowed:

- Insulting, coercing, provoking, abusing and other hostile behaviors towards others.
- Making inappropriate remarks regarding others' race, ethnicity, religious belief, gender, social identity, status, physical health, sexual orientation and other factors.
- Displaying or spreading discriminatory information.
- Spreading rumors that may harm others.
- Harassing employees physically or verbally.

(4) Equal job opportunities

We always adhere to the principle of equality and fairness in providing equal pay, job opportunities and working conditions. The selection, appointment, employment and retention of employees should be determined based on the company's development needs, job qualification standards, employees' work abilities and moral characters. We should evaluate every colleague or candidate objectively and fairly and shall not treat employees differently in the selection, appointment, employment and retention due to factors such as gender, age, race, ethnicity, religious belief, social identity, status, physical health, sexual orientation, etc. We respect the right of employees to collective bargaining, and if employees join legally recognized organizations, we are committed to active communication with representatives of their free choice.

(5) Freedom of association and collective bargaining

We respect employees' rights to participate in, form, or abstain from organizations, ensuring that they are protected from any form of retaliation, threats, or harassment. If employees opt to join an

organization that is recognized by law, we are committed to engaging in constructive and open dialogue with their duly elected representatives.

3. We protect the company's rights and interests

(1) Records and reports

We conduct business in a transparent and honest manner and accept the supervision of the society and relevant institutions. We have the responsibility and obligation to ensure that the information records of the business we handle are accurate, complete and easy to understand.

(2) Use of company assets

We know that company assets are only used for company business purposes. It is not allowed to use or misappropriate company assets for personal gains or any illegal purposes without authorization. Theft and other behaviors are strictly prohibited.

(3) External communication and disclosure

We strictly prohibit individuals from publishing business information related to China Resources on external social media that goes beyond being neutral. Media questions will be answered by designated personnel. Any employee or relevant person cannot disclose internal information at will. In the following cases, the disclosure of information to the outside must obtain the consent of the superior leader.

(4) Acquisition and use of insider information

We always abide by the relevant legal provisions on important non-public information and insider trading. It is prohibited to conduct securities trading activities based on important information (insider information) that has not been widely publicized. All employees are prohibited from using insider information obtained from China Resources Sanjiu or third parties to conduct or entrust others to conduct stock or other securities trading during their employment period, nor can they disclose such information to other parties.

(5) Avoid conflicts of interest

When personal interests or behaviors hinder or may hinder the duties that an individual should perform for China Resources, there is a conflict of interest.

We must not engage in activities that conflict with the interests of China Resources. We should actively identify and resolve potential conflicts of interest in the process of performing our duties.

(6) Protect the company's information security

We strictly abide by the information security policy of China Resources to handle different types of information and properly keep all kinds of information in business activities to prevent information loss or leakage. Employees must realize the importance of data security in daily work to avoid unintentional loss or leakage of confidential information or personal data.

4. We care about society and the public

(1) Protect the environment

We regard environmental protection as one of the important responsibilities of the enterprise, which runs through all business activities. We should fulfill the obligation of environmental protection, maintain the surrounding environment in our own work, and avoid or reduce the adverse impact on the surrounding environment caused by production and business activities. We require:

- Minimize the impact of business activities on the environment by preventing the occurrence of diseases, injuries and pollution incidents.

- Actively advocate and take advantage of various opportunities to expand the space for sustainable development, improve energy use efficiency, improve security measures and reduce the emission of harmful pollutants.
- We promise that wherever we conduct business activities, we will comply with the requirements regarding health, safety, environment and laws.

(2) Abide by laws and regulations

Every employee of China Resources should abide by the laws, regulations and policies applicable to the company of the People's Republic of China. In addition, since the scope of business operations may involve overseas, we promise to abide by the relevant laws, regulations and policies of the countries and regions where the business activities are carried out in the process of performing our duties.

(3) Morality and integrity

Morality is the intangible bottom line for citizens and enterprises in conducting business activities. Each employee should follow the highest standards of morality and integrity in carrying out daily business activities and conduct business activities in an ethical, open and transparent manner. No employee should distort facts to seek any improper benefits for himself or others in any business behavior. Any behavior that violates morality and integrity will damage the reputation and interests of the company.

(4) Charity and public welfare

We advocate that employees participate in the charity and public welfare activities of the company or social organizations within their capabilities. However, employees are not allowed to conduct any charity activities in the name of the company privately, nor can they use any assets of the company, including time, to participate in public welfare activities in violation of regulations. The Company's charity and public welfare activities are strictly under the control of relevant departments, which require that budgets and compliance processes be submitted, the amount of charity and public welfare activities be checked, and invoices of completed activities be checked to ensure that the whole process of charity and public welfare activities is always in compliance.

5. Reporting of non-compliant behaviors

(1) Reporting channels

When you find situations that do not meet the requirements of the Code, you have the responsibility and obligation to report to the following persons or departments:

- Your superior leader.
- The compliance management department of your unit.
- The supervision department of your unit.
- The person in charge or leader in charge of your unit.
- The management department of the corresponding function of the superior unit.
- The group compliance management department.
- The group supervision department.

If you are worried that the reported matters cannot be properly handled due to factors such as conflicts of interest, you can directly report to the group compliance management department or the group supervision department. We will handle all reports confidentially and follow up and handle them in accordance with laws and company policies, and report them to appropriate institutions and organizations.

(2) Anti-retaliation

It is strictly prohibited to retaliate against any employee who seeks advice in good faith, raises concerns, reports disciplinary violations or provides information in an investigation. Examples of retaliation include denying benefits, dismissal, demotion, suspension, threat, harassment or discrimination.

If any individual (regardless of his or her position in China Resources) retaliates against an employee who truthfully reports potential violations in good faith, even if no violations are found after investigation, the company will take appropriate measures. However, if someone deliberately makes false reports, the company will handle it accordingly.

If you think that you or other colleagues have been retaliated against because you seek advice in good faith, raise concerns, report disciplinary violations or provide information in an investigation, you should immediately contact the group compliance management department or the group supervision department.