

反贪腐政策

Policy Statement of Anti Corruption

大金重工股份有限公司（以下简称“公司”）致力于在本公司价值链的各个环节杜绝腐败，要求公司每一位员工和合作供应商遵守并维护公司反腐败政策，确保公司业务建立在公平、公正、透明的基础上，以公平正直的态度尽职履责，树立廉洁的良好风气。

Dajin Heavy Industry Co., Ltd. (hereinafter referred to as "the Company") is committed to eradicating corruption in all aspects of its value chain, requiring every employee and supplier of the Company to abide by and uphold the anti-corruption policy of the Company, ensuring that the Company's business is built on a fair, just and transparent basis, fulfilling duties with fairness and integrity, and fostering a clean and honest atmosphere.

此准则适用于本公司所有员工，包括全职、兼职、外包员工，以及与本公司存在商业往来的利益相关方。

These standards apply to all employees of the Company, including full-time, part-time, outsourced employees, as well as stakeholders who have business dealings with the Company and all affiliated companies.

1 关于员工贿赂、交际及利益冲突

BRIBERY, COMMUNICATION AND CONFLICT OF INTEREST OF EMPLOYEES

公司严格禁止贿赂行为，不容许任何员工行贿、索贿、受贿，包括向客户、供应商、立法和执法单位或其他与公司业务相关的人员索取或提供任何利益；或充当第三方中介以提供、索取或接受任何利益。任何人无论是否得到上级领导许可，利用职权索取或接受任何形式的利益，均违反本准则。

Bribery is strictly prohibited by the Company, and no employee is allowed to offer, solicit or accept bribes, including soliciting or providing any benefits from or to customers, suppliers, legislative and law enforcement authorities or other personnel related to the Company's business; or act as a third-party intermediary to provide, solicit or accept any benefits. Anyone who solicits or accepts benefits in any form by taking advantage of his

authority, regardless of getting permission from superior leaders, shall be deemed as violation of the Code.

1.1 贿赂

Bribery

在任何情况下，员工都不得向任何个人或机构提供贿赂或不正当利益，以谋取个人私利或公司利益。

员工在处理与供应商的关系时，应始终保持公正性，不应试图施加影响以获得对某个特定供应商的“特别对待”，更不得接受供应商和目标供应商任何钱财或礼品，损害对供应商产品价格评估的公正性，从而危害招标选拔程序。

本公司及全体员工不得利用财物或者其他手段进行贿赂以销售商品，在帐外暗中给予对方公司或者个人回扣的，以行贿论处。

Under no circumstances should employees offer bribes or illegitimate benefits to any individual or institution to seek personal gains or Company benefits.

When dealing with suppliers, employees should always maintain impartiality and should not attempt to exert influence to obtain "special treatment" for a particular supplier. Employees are strictly prohibited from accepting any money, gifts, or other forms of compensation from suppliers or potential suppliers, which could compromise the fairness of evaluating supplier's products and prices, thereby undermining the integrity of the bidding and selection process.

1.2 交际

Communication

员工不得直接或间接以任何形式，向与公司业务有关的任何机构或个人索取任何利益。

在与供应商采购谈判时，供应商提供的实物折扣赠品，原则上应该体现在采购合同中，对于无合同或无法体现在合同中的情况，该赠品同样应被视为公司的资产，而非参与谈判员工的个人礼品。

Employees are prohibited from directly or indirectly soliciting any benefits, in any form, from any organization or individual related to the company's business.

Any discounts or gifts provided by the suppliers during procurement negotiations should, in principle, be reflected in the procurement contract. In cases where there is no contract or it is impossible to reflect the gifts in the contract, such gifts should be regarded as assets of the company, rather than personal gifts for the employees involved in the negotiations.

1.3 利益冲突

Conflict of interest

员工不得接受任何直接或间接与公司业务有关的利益，避免在履行职务时妨碍客观公正的判断与处理相关业务，导致触犯法律法规及违反公司规章制度，引发偏袒或不当行为的投诉；如员工意识到存在或可能存在与公司利益冲突，必须立刻以书面形式向其部门负责人如实、及时申报。若未能遵守以上要求，将导致严厉的纪律处分，包括降职、辞退等。

关于员工从业廉洁详细指导，请参考《大金重工管理人员及经济敏感岗位廉洁从业规定》和《大金重工员工纪律考核管理规定》。

Employees are prohibited from accepting any direct or indirect benefits related to the company's business, avoiding hindering objective and fair judgments and handling of related matters while performing their duties, which may result in violations of laws, regulations and company rules, and trigger complaints relevant to favoritism or misconduct. If an employee realizes the existence or potential existence of conflict of interest with the company, they must immediately report the matter timely by honest in writing to their department head. Failure to comply with the above requirements will result in disciplinary actions, including demotion, dismissal, and other consequences.

For detailed guidance on employees' integrity in their work, please refer to the "Dajin Heavy Industry Regulations on Integrity in Employment for Managers and Economically Sensitive Positions" and the "Dajin Heavy Industry Employee Discipline Assessment and Management Regulations."

2 供应商和客户管理

SUPPLIERS AND CUSTOMERS

本公司推行“公平、公开、公正”的阳光采购模式，不断扩大寻价范围，提升采购透明度。保证同合作供应商公平交易，在竞争性的评估过程中公平确定供应商，不予任何理由歧视或欺骗供应商，根据所提供的价格、服务、质量和信誉，客观、公平、公正的选择供应商，同时本着对公司长期商业发展的有利原则来进行。

The Company promotes a “sunshine” procurement model focusing on “fair, open, and just”, and continuously expands the scope of inquiries to enhance procurement transparency. The Company ensures fair transactions with suppliers, fairly selecting suppliers through a competitive evaluation process without discrimination or deception for any reason. The Company select suppliers objectively, fairly, and impartially based on the prices, services, quality, and reputation offered, while adhering to principles that are conducive to the company's long-term business development.

2.1 对供应商的要求

Requirement to suppliers

公司各部门在与供应商签订合同时，应向合作相关方发送廉洁告知函或签署廉洁承诺书、廉洁合同，包括但不限于关于禁止合作方向本集团工作人员及其亲属、特定关系人提供各类好处、便利等条款。

All departments of the Company shall issue an integrity notification letter or sign an integrity commitment and integrity contract with the relevant cooperation parties when entering into contracts with suppliers, which should include, but are not limited to, clauses related to prohibiting the cooperation parties from offering any kind of benefits, conveniences, or other advantages to the staff members of our group, their relatives, or any specific associates.

2.2 与潜在客户和客户的交往

Interactions with potential clients and existing clients.

公司致力于满足客户的需求，提高客户满意度和维持与客户的长期合作关系。同时严禁员工有意或无意地就本公司或竞争对手的产品或服务向客户做出错误的陈述；所有同竞争对手的比较必须是真实、准确、合法的，且基于公开获得的信息，没有误导性。员工不得在书面合同之外与客户签订副协议或私下协议；更不得为了获得或留住客户，向相关人员直接或间接提供金钱或其它任何形式的贿赂。

The Company is dedicated to fulfilling customer needs, enhancing customer satisfaction, and maintaining long-term partnerships with clients. The Company strictly prohibits employees from intentionally or unintentionally making false statements to customers about the company's or competitors' products or services. All comparisons with competitors must be truthful, accurate, lawful, and based on publicly available information, devoid of any misleading elements. Employees are not permitted to enter into side agreements or private arrangements with clients beyond the written contract. Furthermore, to secure or retain clients, employees are strictly forbidden from offering money or any other form of bribe, directly or indirectly, to relevant personnel.

3 反不正当竞争

ANTI-UNFAIR COMPETITION

公平竞争是市场机制高效运行的重要基础，在自由市场体系中，竞争驱动效率和创新。但违反保护竞争的法律可能会受到包括巨额罚款、监禁、名誉受损和被排除在政府合同之外的处罚。公司致力于在任何经营场所遵守反不正当竞争及反垄断相关法律法规，维护市场的公平秩序。

Fair competition is an essential foundation for the efficient operation of market mechanisms. In a free market system, competition drives efficiency and innovation. Violations of laws that protect competition can lead to penalties that include large fines, jail time, damaged reputation and exclusion from government contracts. We are committed to complying with competition and antitrust laws wherever we operate, and competing on a level playing field.

公司员工应：

- 3.1 在与竞争对手发生互动时，请始终参考本准则。
- 3.2 每当出现反不正当竞争/反垄断问题时，应寻求法律事务中心的指导。
- 3.3 充分利用公共信息和竞争环境开展竞争活动。
- 3.4 谨记违法违规行为在任何情况下都不是被允许的。
- 3.5 禁止与竞争对手讨论公司任何与竞争相关的条款、工作、客户或价格。
- 3.6 禁止与竞争对手讨论对任何特定项目或客户提交投标或报价的计划。
- 3.7 禁止与任何人谈论有关抵制或拒绝某些供应商或客户的事宜。
- 3.8 禁止出于伤害或报复竞争对手的目的而采取任何行动。

Employees should:

- 3.1 refer to this policy when engaging in interactions with competitors.
- 3.2 seek guidance from the Legal Affairs Center whenever issues related to anti-unfair competition or antitrust arise.
- 3.3 conduct competitive activities by fully involve public information and the competitive environment.
- 3.4 keep in mind that illegal and unethical behaviors are never permitted under any circumstances.
- 3.5 not discuss with competitors about any Company's terms, jobs, customers, or prices related to competition.
- 3.6 not discuss with competitors about plans to submit bids or quotes for any specific projects or clients.
- 3.7 not discuss with anyone about matters related to boycotting or refusing to work with certain suppliers or clients.
- 3.8 not take any action with the intention of harming or retaliating against competitors.

4 反洗钱

ANTI-MONEY LAUNDERING

洗钱是利用其他合法的商业交易来隐藏非法获得的资金来源,通常涉及现金或汇票形式的付款。可疑活动包括:大额现金交易以及不愿提供可核实信息的客户。本公司遵守适用的反洗钱相关法律法规。零容忍、绝不支持洗钱行为或为其提供便利。

Money laundering is using otherwise lawful business transactions as a way to hide the source of money that has been obtained illegally. Money laundering typically involves payments in the form of cash or money order. Suspicious activity includes: large cash transactions as well as customers who are reluctant to provide verifiable information. The Company is committed to complying with applicable anti-money laundering and counter terrorist financing laws and regulations, and do not condone, facilitate, or support money laundering or terrorist financing.

公司员工应:

4.1 注意付款方式的合规性。

4.2 如果对付款有顾虑,需要向上级领导汇报。

4.3 如果交易可疑,即使没有继续交易,也应向法律事务中心报告这一事项。

Employees should:

4.1 Pay attention to the compliance of payment methods.

4.2 report to superior leader if have any concerns regarding to the payment

4.3 report to the Legal Affairs Center if a transaction is suspicious, even if it is not pursued further.

5 账簿与记录

BOOKS AND RECORDS

销售服务和商品时，如需给合作方折扣，包括但不限于给中间人的佣金、实物等，必须以明示方式给予对方，同时提供真实、完整、准确的证明文件以备核查，并通知财务部门如实入账。

When selling services and goods, if discounts need to be given to partners, including but not limited to commissions to intermediaries, gifts in kind, etc., the personnel who involved in the case must be given to the counterparty in an explicit manner, and authentic, complete, and accurate supporting documents should also be provided for verification purposes. The financial department must be notified to record the transactions accurately.

6 捐赠

DONATION

本公司禁止以任何捐赠形式来掩盖腐败的目的，严格要求所有捐赠和赞助都必须经过相应的审批程序，审批程序的严格程度应随捐款价值逐步增加而增加，尤其是捐赠和赞助的潜在受益人是公职人员或与本公司客户、政府、政治人物有联系的情况下，确保活动的透明、合法。

The company prohibits any form of donation that serves to conceal corrupt purposes. We strictly require that all donations and sponsorships must undergo corresponding approval procedures, with the rigor of the approval process increasing gradually as the value of the donation increases. Particular attention is given to cases where the potential beneficiaries of donations and sponsorships are public officials or are connected to the Company's clients, governments, or political figures, ensuring the transparency and legality of our activities.

7 咨询与举报

CONSULTING AND REPORTING

如您对本政策有任何疑问，可以直接咨询公司审计监察中心，或请参考《大金重工监察投诉举报管理规定》；

如您发现有任何人疑似或已经违反本政策，请通过以下渠道举报：djjc@dajin.cn

本公司对相关举报将开展调查，并对举报人严格保密，绝不允许任何人对举报者打击报复。

If you have any questions about this policy, you can directly consult the Company's Audit and Supervisory Center, or refer to the "Regulations on Complaints and Reports for Supervisory Management of Dajin Heavy Industry".

If you discover any suspected or confirmed violations of this policy, please report them through the following channel: djjc@dajin.cn.

The Company will conduct an investigation into all relevant reports and will maintain strict confidentiality for the reporters. Absolutely no retaliation against reporters will be tolerated.