

厦门建发钢铁集团有限公司
反腐败与反贿赂政策
Xiamen C&D Steel & Iron Group Co., Ltd.
Anti-Corruption and Anti-Bribery Policy

1 目的 Purpose

厦门建发钢铁集团有限公司（以下简称“建发钢铁集团”“本集团”）始终坚持以诚实守信、合乎道德的方式开展业务，对任何形式的腐败与贿赂行为持零容忍态度，并建立有效的防范机制，以杜绝腐败和贿赂行为的发生。本集团制定本政策，以明确本集团全体员工在遵守和维护反腐败和反贿赂立场方面应承担的责任，同时为员工识别和应对腐败与贿赂相关事宜提供指导。

Xiamen C&D Steel & Iron Group Co., Ltd. (hereinafter as “C&D Steel & Iron Group” or “the Group”) consistently conducts its business in an honest, trustworthy, and ethical manner. The Group maintains a zero-tolerance approach toward any form of corruption and bribery and has established effective prevention mechanisms to eliminate the occurrence of such conduct. The Group has formulated this policy to clarify the responsibilities of all employees in upholding and complying with the Group’s anti-corruption and anti-bribery principles, and to provide guidance for identifying and responding to matters related to corruption and bribery.

2 适用范围 Scope

本政策适用于建发钢铁集团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反腐败与反贿赂政策，并需与本政策保持一致。

This policy applies to C&D Steel & Iron Group and its wholly-owned and holding companies. Each unit may develop corresponding anti-corruption and anti-bribery policies based on its actual situation and industry characteristics, which must be consistent with this policy.

3 腐败和贿赂的含义 Definition of corruption and bribery

腐败是指滥用权力、职位（例如个人的公职）、地位或资源等谋取私利，导致本集团利益受损的行为。贿赂是指给予、承诺给予他人财产性利益或其他利益以谋取私利，导致本集团利益受损的行为。

Corruption is the abuse of power, position (such as an individual's public officer position), status, or resources for personal gain in a manner that harms the interests of the Group. Bribery is the act of offering, promising, or giving of financial or other benefits to another party for personal gain in a manner that harms the interests of the Group.

4 **禁止事项 Forbidden Activities**

禁止员工亲自或委派他人代其进行以下行为：

Employees are prohibited from engaging in or appointing others to perform the following actions:

4. 1 为谋取不正当利益，直接或间接向公职人员或其代表提供、给予或承诺任何财产性利益或其他有价值物；

To obtain undue benefits, directly or indirectly provide, give, or promise to give financial benefits or any other valuable item to public officials or their representatives.

4. 2 为获取商业利益或回报已获取的商业利益，直接或间接向私人机构或其人员提供、给予或承诺任何款项或其他有价值物；

Bribing private entities by directly or indirectly providing, giving, or promising to pay money or any other valuable item for gaining business advantages or as a reward for previously obtained commercial benefits.

4. 3 在任何商业谈判或投标过程中，给予或收受可能影响结果的任何款项、有价值物或其他利益；

During any business negotiation or bidding process, provide or accept money or any other valuable item if such conduct may potentially influence the outcome.

4. 4 员工个人或通过代理人、顾问、家庭成员等，接受第三方任何款项或其他有价值物，以此作为本集团向该第三方或任何其他人员提供商业利益的回报；

Employees, whether directly or through agents, consultants, family members, or other parties, accepting money or any other valuable item from a third party in return for the Group providing business benefits to such third party or any other person.

- 4.5 利用职务上的便利，侵吞、窃取、骗取或以其他方式非法侵占本集团财产；
Misappropriating, stealing, fraudulently obtaining, or otherwise illegally occupying Group property by taking advantage of one's position or authority.
- 4.6 为促使或加快取得政府有关部门例行职责或事务处理而给予疏通费；
Providing facilitation payments to induce or expedite the routine duties or administrative actions of government authorities or officials.
- 4.7 对拒绝实施贿赂或按本政策反映问题的人员，进行任何形式的威胁或报复；
Threatening or retaliating against individuals who refuse to engage in bribery or raise concerns under this policy.
- 4.8 参与任何其他可能违反本政策的腐败或贿赂行为。
Engaging in any other actions that may result in a violation of this policy.

5 礼金、礼品和招待 **Cash Gifts, Gifts and Hospitality**

本集团规范管理礼品、礼金和招待的收受，以避免发生实际或潜在的腐败或贿赂风险。本集团仅提供或接受属于正常商务礼仪范围内的礼品、礼金和招待。

任何员工在向第三方提供与本集团业务相关的礼品、礼金或招待之前，须取得有权审批人批准。员工对于明显超出正常商务往来范畴、可能造成业务不公或损害本集团利益的礼金、礼品及招待，应当予以拒收或退回。若员工无法拒绝从第三方收受超过规定价值的礼品、礼金或有价物，则应将所收受的礼品、礼金或有价物统一上缴本集团相关部门登记处理。

The Group regulates gifts and hospitality to prevent actual or potential risks of bribery or corruption. The Group only provides or accepts gifts, cash gifts, and hospitality that fall within the realm of standard business etiquette. Employees must obtain prior authorized approval before providing any gifts, cash gifts or hospitality related to the Group's business to third parties. Employees shall refuse or return any gifts, cash gifts, or hospitality that clearly exceed the scope of normal business interactions and may result in unfair business practices or harm the interests of the Group. If an employee is unable to refuse gifts or valuable items from a third party that exceed the prescribed value, they shall promptly submit the received gifts or valuable items to the relevant department of the Group for registration and handling.

6 赞助、慈善捐赠和社区投资 Sponsorship, Donations and Community

Investment

本集团禁止以赞助、慈善捐赠或社区投资为名，掩饰腐败贿赂行为或谋取不正当商业利益。所有赞助、慈善捐赠及社区投资行为不得对本集团任何商业决策产生不当影响。该类行为应符合相关法律法规，按照本集团规章制度履行内部审批决策程序，并妥善保存全部捐款、赞助及社区投资记录。

The Group strictly prohibits engaging in sponsorship, donations, or community investment activities to conceal bribery or seek undue business advantages. No sponsorship, donations, or community investment activities shall unduly influence any of the Group's business decision-making. The Group's sponsorship, donations, or community investment activities must comply with relevant laws and regulations and the Group policies. These activities should adhere to the appropriate internal approval processes within the Group, and records of such donations, sponsorship, or community investments should be diligently maintained.

7 培训与宣导 Training and Communication

本集团面向全体员工开展反腐败反贿赂教育与培训，传达有关反腐败反贿赂政策制度及相关要求，以树立员工廉洁诚信意识。此外，本集团积极向供应商、承包商、客户等合作伙伴进行反腐败反贿赂政策宣贯，倡导并推动各方共同遵守廉洁从业要求。

The Group provides anti-corruption and anti-bribery education and training to all employees to communicate relevant policies, systems, and requirements, and to strengthen employees' awareness of integrity and ethical conduct. In addition, the Group actively promotes its anti-corruption and anti-bribery policies to suppliers, contractors, customers, and other business partners, and advocates and encourages all parties to jointly comply with integrity and ethical business conduct requirements.

8 报告 Whistleblowing

本集团鼓励员工、合作伙伴等利益相关方向本集团实名/匿名反馈或举报任何可能发生或已经发生的贿赂或腐败行为，并对其采取必要的保护措施。本集团对投诉举报人身份信息及投诉举报材料采取保密措施，并承诺任何人均不会因拒绝参与贿赂或腐败，或善意举报实际或可疑的腐败贿赂行为而遭受

不利待遇或打击报复。

The Group encourages employees, business partners, and other stakeholders to report or disclose, on a named or anonymous basis, any suspected or actual acts of bribery or corruption, and will take necessary measures to protect such individuals. The Group shall keep the identity information of whistleblowers, as well as related reporting materials, confidential, and commits to ensuring that no one will suffer adverse consequences for refusing to participate in bribery or corruption, or for making a good faith report of suspected actual or potential bribery or other corrupt practices that have occurred or are about to occur.

9 责任追究 **Accountability**

任何违反本政策或违反有关法律法规的员工将面临处罚，包括但不限于降职、解雇、索赔等。任何供应商、顾客、代理、顾问及其他与本集团开展业务合作的第三方若违反本政策，本集团可终止合作关系并采取任何可用的法律手段。同时本集团有权将上述责任单位或人员移交相关政府机构、当地监管机构或执法机构处理。

Any employee who violates this policy or applicable laws and regulations shall be subject to disciplinary actions, including but not limited to demotion, dismissal, and claims for compensation. Where any supplier, client, agent, consultant, or other third party conducting business with the Group violates this policy, the Group may terminate the business relationship and pursue any available legal remedies. The Group also reserves the right to refer the relevant responsible entities or individuals to the appropriate government authorities, regulatory bodies, or law enforcement agencies for further action.

10 生效 **Effective Date**

本政策自公布之日起生效。

This policy shall come into effect from the date of 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.

厦门建发钢铁集团有限公司

Xiamen C&D Steel & Iron Group Co., Ltd.

2026 年 月 日

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