

厦门建发钢铁集团有限公司
商业行为准则
Xiamen C&D Steel & Iron Group Co., Ltd.
Business Code of Conduct

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”）遵守国内及业务所在国家或地区相关法律法规，遵循相关国际标准与公约，秉持合法合规、诚信公平原则，以高道德标准开展各项业务，践行对环境和社会的企业公民责任。为明确本集团全体员工在业务活动中应遵守的基本原则与行为规范，确保员工“知言行”的高度统一，维护本集团良好声誉，特制定本准则。本集团也期望并鼓励供应商、承包商、客户等业务合作伙伴共同遵守本准则，共建诚信、自由、公平、负责任的商业生态。

Xiamen C&D Steel & Iron Group Co., Ltd. (hereinafter referred to as “C&D Steel & Iron Group” or “the Group”) complies with applicable laws and regulations in China and in the countries or regions where it conducts business, follows relevant international standards and conventions, and conducts all business activities with high ethical standards based on the principles of legality, compliance, integrity, and fairness. The Group also fulfills its corporate citizenship responsibilities toward the environment and society. To clarify the basic principles and behavioral norms that all employees of the Group shall observe in business activities, ensure a high level of consistency between employees’ knowledge, words, and actions, and maintain the Group’s good reputation, the Group has formulated this Business Code of Conduct. The Group also expects and encourages business partners, including suppliers, contractors, and customers, to jointly comply with this Business Code of Conduct and work together to build an honest, free, fair, and responsible business ecosystem.

2 适用范围 Scope

本准则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制定相应的商业行为准则，并需与本准则保持一致。

This Business Code of Conduct applies to C&D Steel & Iron Group and its wholly-owned and holding companies. Each unit may develop its own business code of conduct based on its actual situation and industry characteristics, which must be consistent with this Business Code of Conduct.

3 **诚信合规经营 Business Integrity and Compliance**

本集团全体员工应以合法合规、信守承诺、实事求是、诚信本分作为业务经营的基础，以合法、守信、真诚的标准做人做事，树立值得信赖的个人和企业形象，避免出现任何违法违规或不当行为。

All employees of the group must conduct business based on legality, compliance, commitment, truthfulness, and integrity. They should behave and handle their work with principles of lawful, trustworthiness, and sincerity, establishing a reliable image for themselves, and the company and avoid any illegal, non-compliant, or improper conduct.

4 **反腐败与反贿赂 Anti-Corruption and Anti-Bribery**

本集团禁止任何形式的腐败和贿赂行为。本集团员工不得收受他人贿赂或向他人行贿、介绍贿赂，不得利用职务便利提供或收取可能对本集团业务造成不公平影响的报酬或其他利益等行为。针对违反反腐败贿赂相关规定的行为，本集团将依法依规采取处置措施。

The Group prohibits any form of corruption and bribery. Employees of the Group shall not accept bribes from others, offer bribes to others, act as intermediaries for bribery, or use their positions to provide or receive remuneration or other benefits that may have an unfair impact on the Group's business. The Group will take appropriate measures in accordance with laws, regulations, and internal rules against any conduct that violates anti-corruption and anti-bribery requirements.

5 **避免利益冲突 Conflicts of Interest**

本集团员工应尽可能避免产生个人与本集团的利益冲突。本集团员工在面对利益冲突情形时应及时、主动向本集团报告并回避，本集团采取相关措施以尽可能规避利益冲突对企业与员工的影响。

Employees of the Group shall strive to avoid conflicts of interest between their personal interests and those of the Group to the greatest extent possible. In situations involving a conflict of interest, employees shall promptly and proactively report to the Group and recuse themselves. The Group will take relevant measures to mitigate the impact of conflicts of interest on both the enterprise and employees to the extent possible.

6 反洗钱 **Anti-Money Laundering**

本集团遵循国内及国际上有关反洗钱的法律法规，严禁员工参与或协助任何洗钱、恐怖主义活动或相关违法犯罪活动。本集团坚持与资金来源合法、声誉良好的商业伙伴开展合作，确保业务合法合规。

The Group complies with domestic and international laws and regulations relating to anti-money laundering. Employees are strictly prohibited from participating in or assisting with any money laundering, terrorist activities, or related illegal or criminal activities. The Group is committed to cooperating with business partners that have legitimate sources of funds and sound reputations, to ensure lawful and compliant business operations.

7 自由和公平竞争 **Free and Fair Competition**

本集团倡导自由竞争和公平竞争，严格遵守国内及业务所在国家或地区反不正当竞争、反垄断相关法律法规。本集团禁止采取侵犯商业秘密、制造散播虚假信息等不正当、不合法或不道德的手段，以争取交易机会或损害竞争对手的合法权益，扰乱经济秩序的行为，自觉避免垄断行为的发生。

The Group advocates free and fair competition and strictly complies with laws and regulations relating to anti-unfair competition and anti-monopoly in China and in the countries or regions where it conducts business. The Group prohibits any improper, illegal, or unethical means, including infringement of

trade secrets or the creation and dissemination of false information, to obtain business opportunities, harm the legitimate rights and interests of competitors, or disrupt economic order. The Group consciously avoids the occurrence of monopolistic conduct.

8 **保护本集团资产 Protection of the Group's Assets**

本集团员工在开展业务过程中应保护本集团资产，不得滥用、损坏、侵占或擅自处置本集团资产。本集团资产包括现金、物资、设备设施、车辆等实物资产以及知识产权、商业秘密、数据信息、声誉等非实物资产。

Employees of the Group shall protect the Group's assets during business and not misuse, damage, misappropriate, or dispose of the Group's assets without authorization. The Group's assets include tangible assets such as cash, materials, equipment and facilities, and vehicles, as well as intangible assets such as intellectual property, trade secrets, data and information, and reputation.

9 **信息安全与隐私保护 Information Security and Privacy Protection**

本集团重视信息安全与隐私保护，通过信息资产管理、信息安全检查等合理可行的措施尽力保护员工、客户、供应商等利益相关方的信息，防止数据信息未经授权的访问、泄露、丢失和损坏，确保数据信息的安全性、完整性。

The Group attaches great importance to information security and privacy protection. Through reasonable and feasible measures such as information asset management and information security inspections, the Group strives to protect the information of stakeholders including employees, customers, and suppliers, prevent unauthorized access, disclosure, loss, or damage of data and information, and ensure the security and integrity of data and information.

10 **依法纳税 Taxation Compliance**

本集团遵守国内及业务所在国家或地区有关税收的法律法规，依法履行纳税义务。

The Group complies with laws and regulations relating to taxation in China and in the countries or regions where it conducts business, and fulfills its tax obligations in accordance with the law.

11 **保护环境 Environmental Protection**

本集团积极应对气候变化，通过能源结构优化等措施努力减少自身运营过程中的温室气体排放，同时也鼓励价值链合作伙伴推进绿色低碳转型。本集团重视环境保护，遵守环境保护相关法律法规，通过落实污染物排放管理、废弃物管理、水资源管理等方面的各项管理措施，减少污染物排放和水资源消耗，提高资源利用效率，不断提升环境绩效表现，尽可能降低本集团业务活动对环境造成的影响。本集团也关注生态环境与生物多样性保护，避免在重要生态保护区域开展运营活动，尽量减少业务运营对生态环境及生物多样性的不利影响。

The Group actively addresses climate change and strives to reduce greenhouse gas emissions from its own operations through measures such as optimizing its energy structure. The Group also encourages value chain partners to promote green and low-carbon transformation. The Group attaches great importance to environmental protection, complies with laws and regulations relating to environmental protection, and reduces pollutant emissions and water consumption, improves resource utilization efficiency, and continuously enhances environmental performance by implementing management measures in areas such as pollutant emissions management, waste management, and water resources management, thereby minimizing the environmental impact of the Group's business activities to the extent possible. The Group also pays attention to ecological environment and biodiversity conservation, avoids conducting operations in important ecological protection areas, and strives to minimize the adverse impact of business operations on the ecological environment and biodiversity.

12 **保障劳工权益 Protection of Labor Rights**

本集团尊重并保障员工的合法权益，致力于为员工提供包容、公平、健康的职场环境。本集团严格遵守国家有关劳动法律法规，坚持公平、规

范的用工原则，在员工招聘、培训、晋升等方面提供平等机会，坚决反对基于种族、宗教、年龄、性别、国籍等因素的歧视或不公平对待；坚决反对任何形式的童工、强迫劳动或人口贩卖行为，保护员工不受欺凌、恐吓、骚扰、虐待等不当行为；尊重和保障员工所享有的获取劳动报酬、休息休假、结社自由与集体谈判等各项权利。

The Group respects and protects the legitimate rights and interests of employees and is committed to providing employees with an inclusive, fair, and healthy workplace. The Group strictly complies with national labor laws and regulations, upholds fair and standardized employment principles, and provides equal opportunities in employee recruitment, training, promotion, and other areas. The Group firmly opposes discrimination or unfair treatment based on race, religion, age, gender, nationality, or other factors; firmly opposes any form of child labor, forced labor, or human trafficking; protects employees from improper conduct such as bullying, intimidation, harassment, and abuse; and respects and safeguards employees' rights to labor remuneration, rest and leave, freedom of association, collective bargaining, and other rights.

13 职业健康与安全 **Occupational Health and Safety**

本集团坚持将职业健康与安全置于首位，建立健全职业健康与安全管理体制，加强职业健康与安全风险的识别、评估与管控，为员工提供安全、健康的工作环境。

The Group places occupational health and safety first, establishes and improves its occupational health and safety management system, strengthens the identification, assessment, and control of occupational health and safety risks, and provides employees with a safe and healthy working environment.

14 负责任采购 **Responsible Procurement**

本集团倡导负责任采购原则，宣导并推动供应商遵循商业道德、公平竞争、人权保护、安全健康、环境保护、产品质量等方面的行为准则，负责任地开展业务。

The Group advocates responsible procurement principles, promotes and encourages suppliers to follow codes of conduct relating to business ethics, fair competition, human rights protection, safety and health, environmental protection, product quality, and other areas, and to conduct business responsibly.

15 社区参与 **Community Engagement**

本集团致力于与所在社区保持长期良好关系，关注社区发展以及自身业务活动对社区的影响，以真诚友好的态度与社区建立沟通交流渠道，倾听社区诉求和期望。本集团通过多种形式支持所在社区的经济、文化、教育、环境等方面的建设，推动企业与社区的共同繁荣发展。

The Group is committed to maintaining long-term and positive relationships with the communities where it operates, paying attention to community development and the impact of its business activities on communities. The Group establishes communication channels with communities in a sincere and friendly manner and listens to community concerns and expectations. Through various forms, the Group supports the development of local communities in areas such as economy, culture, education, and the environment, and promotes the common prosperity and development of the enterprise and the community.

16 投诉与投诉人保护 **Complaints and Whistleblower Protection**

本集团鼓励员工、供应商、客户等利益相关方向本集团报告涉嫌违反法律法规、本集团政策制度或本准则的行为，利益相关方可通过本集团公开的投诉渠道提交匿名或实名报告，本集团员工也可向本集团有关部门进行反馈。本集团采取投诉人保护举措，严格落实保密机制，加强投诉人保护。本集团对打击报复行为秉持零容忍态度，尽可能保护投诉人免于遭受任何形式的打击报复。

The Group encourages employees, suppliers, customers, and other stakeholders to report suspected violations of laws and regulations, the Group's policies and systems, or this Code to the Group. Stakeholders may submit anonymous or real-name reports through the Group's publicly

available complaint channels, and employees of the Group may also provide feedback to relevant departments of the Group. The Group adopts measures to protect whistleblowers, strictly implements confidentiality mechanisms, and strengthens whistleblower protection. The Group maintains a zero-tolerance attitude toward retaliation and protects complainants from any form of retaliation to the extent possible.

17 **责任追究 Accountability**

若员工违反本准则中的行为，本集团将根据相关管理规定对其采取相应的纪律处分及处罚措施，情形严重的，将依法追究其相关法律责任。

If an employee violates this Business Code of Conduct, the Group will impose corresponding disciplinary actions and penalties in accordance with relevant management rules. Where the circumstances are serious, the employee's relevant legal liabilities will be pursued in accordance with the law.

18 **生效 Effective Date**

本准则自公布之日起生效。

This Business Code of Conduct shall come into effect from the date of its 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.

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

2026年 月 日

XX XX, 2026