

厦门建发钢铁集团有限公司
信息安全政策
Xiamen C&D Steel & Iron Group Co., Ltd.
Information Security Policy

1 目的 Purpose

信息安全对企业数字化转型及业务稳健运营至关重要，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”）高度重视信息安全保护，加强信息安全管理，以保障本集团信息安全，保护利益相关方隐私。为指导和规范本集团信息安全管理，特制定本政策。

Information security is essential to enterprise digital transformation and the stable operation of business. Xiamen C&D Steel & Iron Group Co., Ltd. (hereinafter as “C&D Steel & Iron Group” or “the Group”) attaches great importance to information security protection and strengthens information security management to safeguard the Group’s information security and protect the privacy of stakeholders. To guide and regulate the Group’s information security management, the Group has formulated this Policy.

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制定相应的信息安全政策，并需与本政策保持一致。同时，本集团鼓励供应商、承包商等业务合作伙伴理解并遵循本政策。

This Policy applies to C&D Steel & Iron Group and its wholly-owned and holding companies. Each unit may develop its own information security policy based on its actual circumstances, provided that such policy remains consistent with this Policy. Meanwhile, the Group encourages suppliers, contractors, and other business partners to understand and comply with this Policy.

3 相关措施 Measures

3.1 信息安全合法合规 Information Security Compliance

严格遵守并落实业务所在国家或地区所适用的信息安全相关法律法规和其他规范，并按照相关规定开展信息安全管理。

The Group strictly complies with and implements applicable laws, regulations, and other rules relating to information security in the countries

or regions where it conducts business, and carries out information security management in accordance with relevant requirements.

3.2 信息安全管理 Information Security Management

建立健全信息安全管理架构，制定信息安全管理相关制度，持续完善信息安全管理机制，通过采取技术防护和管理措施，防止数据信息未经授权被访问、泄露、丢失或损坏，确保数据信息的安全性、完整性。

The Group establishes and improves its information security management structure, formulates information security management systems, and continuously enhances its information security management mechanisms. Through technical protection and management measures, the Group prevents unauthorized access, disclosure, loss, or damage of data and information, and ensures the security and integrity of data and information.

3.3 信息安全检查 Information Security Inspection

定期开展内部或外部信息安全检查、信息系统审计等工作，及时排查、识别重要信息系统的安全风险，并采取有效措施应对和处理信息安全风险和漏洞。通过设置畅通的渠道，鼓励员工向直属领导或有关部门反馈或汇报任何信息安全问题。

The Group regularly conducts internal or external information security inspections, information system audits, and other related work to promptly investigate and identify security risks in important information systems, and takes effective measures to address and handle information security risks and vulnerabilities. By establishing accessible channels, the Group encourages employees to provide feedback or report any information security issues to their immediate supervisors or relevant departments.

3.4 信息安全文化建设 Information Security Culture Development

充分利用多种渠道和形式，面向全体员工普及、宣贯信息安全常识与网络反诈技巧，鼓励参与信息安全技能知识竞赛等活动，增强员工信息安全防范意识，培育良好的信息安全文化。

The Group makes full use of various channels and forms to popularize and promote information security knowledge and online anti-fraud skills among all employees, encourages participation in activities such as information security skills and knowledge competitions, enhances employees' awareness of information security prevention, and cultivates a positive information security culture.

3.5 信息安全事件应对 Information Security Incident Response

针对信息安全事件制定应急预案，定期开展信息安全应急响应演练工作，不断提高处理信息安全突发事件的能力，形成科学、有效、反应迅速的信息安全报告机制及应急响应工作机制。

The Group formulates emergency plans for information security incidents, regularly conducts information security emergency response drills, continuously improves its ability to handle information security emergencies, and establishes a scientific, effective, and rapid information security reporting mechanism and emergency response mechanism.

4 **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 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.

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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