



China Hongqiao Group Limited

中国宏桥集团有限公司

(Incorporated in the Cayman Islands with limited liability)

(the "Company")

(Stock Code: 1378)

CORPORATE CODE OF CONDUCT

(Adopted by the Sustainability Committee of the Company on 15 August 2025)

I. General Provisions

1. Purpose of Formulation

China Hongqiao Group Limited and its subsidiaries (hereinafter referred to as "China Hongqiao" or "the Group") have always adhered to the core values of "Starting a Business for the Country and Benefiting the People". To standardize the behaviors of all employees and ensure the legal, compliant, and sustainable development of the Group, the *Corporate Code of Conduct* (hereinafter referred to as "the Code") is formulated. The Code is designed to assist all employees in conducting business operations with the highest standards of ethical conduct, respecting labor rights, protecting human rights, and fulfilling environmental responsibilities.

2. Formulation Basis

The Code is formulated with reference to international standards such as the Ten Principles of the United Nations Global Compact, United Nations Global Guidelines on Corporate Social Responsibility and Human Rights, and International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as applicable laws and regulations.

3. Scope of Application

The Code applies to all employees of China Hongqiao Group headquarters and subsidiaries/branches with operational control (full-time employees, part-time employees, interns, and dispatched workers, including board members and senior management), covering all aspects of the value chain, including production, operations, sales, and services. The Group actively promotes relevant contractors, suppliers and partners to implement the Code. In case of a conflict between the Code and applicable local laws and international standards, the higher standard shall prevail.

II. Core Codes

1. Society

The Group prioritizes human rights and complies with relevant principles and regulations, prohibits child labor and discrimination, respects the rights and interests of indigenous peoples; safeguards labor rights, supports employee association and collective bargaining, ensures fair remuneration and working hours; and pays attention to occupational health and safety.

1.1 Human Rights

(1) The Group complies with the United Nations Guiding Principles on Business and Human Rights, formulates policy commitments to respect human rights, and conducts human rights due diligence.

(2) The Group respects human rights, strictly complies with laws, regulations, and international labor conventions, prohibits and does not support the use of child labor, protects the rights and interests of minors and women, prohibits any form of discrimination and inhumane treatment of employees, and strives to fulfill corporate social responsibilities.

(3) The Group respects the rights and interests of indigenous peoples, in line with international standards and national and local government laws and regulations. In project design, feasible alternatives are considered to avoid or minimize the displacement of communities from substantial locations or properties, while balancing environmental, social, financial costs and benefits, with special attention to the impact on the poor, vulnerable groups and women. The Group respects the legal and traditional rights and interests of local communities in relation to their land, livelihoods, and the use of natural resources, and takes appropriate steps to prevent and address any adverse impact of the Group's activities on the livelihoods of local communities.

(4) The Group commits to not using minerals sourced from conflict-affected and high-risk areas, nor to contributing to armed conflicts or human rights abuses.

1.2 Labor Rights

(1) In accordance with ILO conventions and applicable national and local government laws and regulations, the Group respects employees' rights to freedom of association and engage in association and collective bargaining.

(2) The Group prohibits the use of child labor, does not support any form of child labor, ensuring the protection of minors; the Group prohibits forced labor and labor involving human trafficking, and does not use or support corporal punishment, mental or physical coercion, harassment (including sexual harassment), gender-based violence, or verbal abuse.

(3) The Group prohibits any form of discrimination. In matters such as employment, remuneration, promotion, training, or dismissal, the Group does not discriminate on the basis of gender, race, religion, disability, marital status, childbearing status, or any other status, ensuring equal opportunities.

(4) In management practices, the Group adheres to a people-oriented approach, takes motivating and inspiring employees' enthusiasm and creativity as the fundamental means, integrates the realization of employees' self-worth with the development of the Group, aims to improve efficiency and promote employees' continuous self-improvement and development, and strives to build an outstanding corporate.

(5) The Group has established employee complaint channels to ensure that employees and their representatives can openly communicate on issues such as working conditions and remuneration without retaliation, intimidation, or harassment.

(6) The Group guarantees employees' right to receive remuneration, ensuring that wages are not lower than the legal or industry minimum wage standard, meet basic needs, and are paid in a timely manner in accordance with the law.

(7) The Group complies with laws and industry standards regarding working hours (including overtime), holidays, and paid annual leave.

1.3 Occupational Health and Safety

(1) The Group establishes and operates an occupational health and safety management system that meets applicable national and international standards, and encourages third-party certification to demonstrate its effectiveness.

(2) The Group implements the environmental and occupational health and safety policy of "People-oriented, building an outstanding corporate; meticulous production, creating first-class products; integrity and law-abiding, pursuing customer satisfaction; prevention first, ensuring safe production; reducing pollution and consumption, taking the path of sustainable development", and regularly reviews its effectiveness.

(3) The Group implements environmental, occupational health and safety management, and performance management measures to provide safe and healthy working conditions for all employees and contractors.

(4) The Group strengthens communication with employees, ensures their right to participate in management, maintains the effective operation of labor unions or employee representatives, provides mechanisms for employees to propose, discuss, and participate in solving occupational health and safety issues with management, and evaluates and continuously improves occupational health and safety performance.

2. Governance

China Hongqiao has always adhered to compliance with national laws and regulations in production and operation, takes on social responsibility, upholds principles of ethical business conduct, and continuously improves the management systems of the Group.

2.1 Integrity in Operations

(1) The Group establishes and implements comprehensive and specialized management systems to maintain awareness of applicable laws and ensure compliance.

(2) The Group opposes all forms of corruption, including extortion and bribery, and implements a zero-tolerance policy.

(3) The Group identifies the risk levels of labor and business ethics, and controls risks through technical or management means.

(4) The Group conducts fair transactions and operates with integrity, opposes unfair competition, corruption, embezzlement, fraud, and other similar behaviors, and pursues sincere cooperation and mutual benefit.

2.2 Management Policies

(1) The Group strictly complies with applicable laws, regulations, and other requirements, and establishes an equal, healthy, safe, harmonious, and non-discriminatory working environment. The Group's employment practices, working hours, salary and benefits, and various management systems all comply with legal requirements.

(2) The Group formulates management policies for labor and business ethics, as well as quality, environmental, and occupational health and safety management policies, and fulfills environmental, social, and governance responsibilities.

(3) The Group establishes quality management systems, environmental management systems, occupational health and safety management systems, food safety management systems, etc., to fulfill social responsibilities.

(4) The Group conveys the Supplier Code of Conduct to all suppliers, contractors, and service providers, requiring them to commit to complying with applicable local laws, regulations, and corporate code of conduct standards, and to accept on-site inspections that the Group may conduct.

(5) The Group strengthens occupational health and safety and environmental management for new, renovated, expanded projects, as well as technological transformation and introduction projects in accordance with laws and regulations, to prevent work safety accidents and protect employees' health and the environment.

(6) The Group optimizes the allocation of various resources through modern management practices that are procedural, institutional, standardized, and refined. This approach ensures efficient and coordinated operations across all internal production processes, enabling to produce top-quality products.

(7) The Group identifies and assesses potential emergency or latent situations (including environmental factors and hazard sources), formulates emergency plans for high-risk emergencies, equips with emergency facilities, provides training to employees, conducts regular assessments and drills as scheduled, and determines and reviews the effectiveness of the plans based on results.

(8) In the process of mergers, acquisitions, closures, decommissioning, and divestments, the Group strictly reviews relevant environmental, social, and governance issues to ensure they are well-planned and managed.

2.3 Transparency and Disclosure

- (1) The Group standardizes the work of corporate information disclosure, improves transparency, and provides a sound environment for corporate operations.
- (2) The Group publicly discloses the governance methods and substantial impacts on the environment, society, and economy in accordance with applicable laws and regulations, commits to disclosing information such as major fines, judgments, and penalties imposed for violating laws and regulations, makes payments to the government in accordance with laws, regulations, or contracts, and regularly discloses financial reports, etc.
- (3) The Group establishes a comprehensive information communication mechanism to address complaints and appeals from stakeholders through multiple channels.

2.4 Lifecycle Management

- (1) The Group assesses the environmental impact of products from a lifecycle perspective, improves resource efficiency, promotes the recycling and reuse of aluminum, and practices sustainable development strategies.
- (2) The Group considers lifecycle impacts in product design and formulates clear environmental goals, including the environmental lifecycle impacts of end products.
- (3) The Group considers lifecycle impacts in equipment maintenance and raw material input.
- (4) The Group reduces process waste generation in production and sets targets for recycling or reuse.
- (5) The Group closely cooperates with recycling and circular utilization units to support the accurate measurement and strive to improve the recycling and reuse of aluminum-containing products.

3. Environment

The Group keeps pace with the development of a low-carbon economy, striving to achieve industry-leading levels in production energy consumption, pollutant emissions, greenhouse gas emissions, and comprehensive resource utilization. The Group continuously improves efforts to build a resource-saving and environment-friendly corporate, and realizes the coordinated development of corporate economic benefits and environmental benefits.

3.1 Pollutant Management

- (1) The Group effectively manages emissions of air and water pollutants that affect human health and the environment, minimizes emission concentrations as much as possible in compliance with laws and regulations, and manages waste in accordance with the waste reduction hierarchy.
- (2) The Group maximizes the recycling and reuse of aluminum-containing materials through the treatment of aluminum dross, aluminum slag, and residues.

3.2 Water Resources Management

The Group responsibly utilizes and manages water resources, and timely publicly discloses water balance diagrams and water resource risk assessments.

3.3 Biodiversity

The Group manages impacts on biodiversity in accordance with the order of the mitigation hierarchy, protecting ecosystems and biological species. Through managing and controlling production and living activities, it ensures no impact on ecosystems, no damage to biodiversity, maximizes the protection of biological resources, and benefits both the present and future generations.

3.4 Greenhouse Gas Emissions

In accordance with the ultimate goal of the *United Nations Framework Convention on Climate Change* and the national "dual-carbon strategy", the Group is committed to greenhouse gas emission reduction management from a lifecycle perspective to mitigate negative impacts on the global climate. It conducts annual inventories of greenhouse gas emissions and various energy usage, and formulates emission reduction plans and corresponding measures and schemes.

3.5 Energy Management

- (1) Vigorously adopt new energy-saving technologies, processes, materials, and equipment to improve energy efficiency and economic benefits, and realize the green development of the corporate.
- (2) Adhere to a people-oriented approach, fulfill social responsibilities, encourage full employee participation and process control, reduce carbon emissions, and build a low-carbon corporate.

III. Supplementary Provisions

1. Continuous Improvement

When necessary, revise the Code according to legal and regulatory changes, industry standards and feedback from stakeholders, and publicly update the content through the official website, ESG reports, etc., to ensure the adaptability and effectiveness of the Code.

2. Approval Authority

The Code is reviewed and approved by the Sustainability Committee under the Group's Board of Directors and shall come into force on the date of issuance.

3. Interpretation

The Code shall be interpreted by China Hongqiao. The document is prepared in both Chinese and English. In case of any discrepancy between the Chinese and English versions, the Chinese version shall prevail.