China Hongqiao Group Limited
中國宏橋集團有限公司
(Incorporated in the Cayman Islands with limited liability)
(the “Company”)
(Stock Code: 1378)

INTEGRITY MANAGEMENT AND ANTI-CORRUPTION POLICY (Revised)

(Adopted by the Sustainability Committee of the Company on 24 April 2026)

1. General Provisions

1.1 This policy is formulated to establish a positive image of the Company and its workforce, promote integrity in the conduct of all employees of the Company and its subsidiaries ("the **Group**"), regulate internal anti-corruption practices and culture within the Group, and champion a culture of integrity.

1.2 The Group adopts a zero-tolerance approach towards all forms of bribery and corruption and is committed to ensuring that its employees uphold business ethics and integrity at all times in all business transactions, pursue high standards of integrity and embody probity, honesty and integrity, fairness, impartiality and sound business ethics as the core values of the Group. All employees shall abide by laws and regulations, faithfully safeguard the interests of the Group, act with integrity and dedication, remain loyal to their duties, and are prohibited from taking advantage of their power or position to seek improper benefits.

1.3 Any form of corruption, bribery, fraud, illegal fundraising or other such acts, wherever committed, may result in criminal prosecution or regulatory action being taken against the Group, its directors or employees, leading to criminal or civil sanctions, including fines and imprisonment, and may damage the business and reputation of the Group, and undermine the Group's relationships with regulatory authorities, its customers, suppliers and business partners.

2. Scope of Application and Definitions

2.1 This policy applies to all employees of the Group, including directors, senior management and employees (whether full-time, part-time or temporary), external parties having business dealings with the Group, and persons acting on behalf of the Group as agents or trustees (including but not limited to agents, consultants and contractors) (collectively, the "**Employees**"), and constitutes the fundamental code of conduct that all employees must strictly observe. The Group also advocates for and promotes suppliers, customers and other value chain partners to jointly follow the purpose and principles of this policy.

2.2 "**Corruption**" referred to in this policy means the act of accepting or soliciting benefits from others, or illegally taking possession of public property, by taking advantage of one's power, position, status or resources, for personal gain and to the detriment of the company's interests.

2.3 "**Bribery**" referred to in this policy means the act of giving or promising to give a benefit to a relevant person, enterprise or institution with the intent to obtain an improper advantage or to achieve another improper purpose.

2.4 "**Benefit**" referred to in this policy includes but is not limited to gifts, loans, fees, remuneration, commissions, travel, accommodation, positions, employment or contracts, or other advantages.

2.5 "**Facilitation Payment**" referred to in this policy typically means an unofficial payment made to induce or expedite the performance of routine government duties or actions.

3. Solicitation, Acceptance or Provision of Benefits

3.1 Notwithstanding that improper treatment is not involved, all employees shall not, for themselves or for others, solicit or accept any benefit from any person, enterprise or institution having business dealings with the Group, or from their subordinates.

3.2 When conducting any business for the Group, no director or employee shall, directly or indirectly through a third party, offer a benefit to any director, employee or agent of another company or institution with the intent to influence such person or any public official.

3.3 All employees shall not engage in any of the following conduct:

3.3.1 Accept or solicit any benefit or transfer of benefits from any enterprise or individual having a business relationship with the Group;

3.3.2 Accept or solicit any benefit provided by the Group's customers or its management and service recipients;

3.3.3 Appropriate for themselves any discounts, rebates, commissions, gift money, gifts, etc. arising from the Group's business dealings;

3.3.4 Use the Group's resources, business channels, trade secrets, intellectual property rights, etc. to engage in profit-making activities or transfer of benefits for the employees themselves or others;

3.3.5 Take advantage of their position to misappropriate, steal, defraud or otherwise illegally take possession of the Group's property;

3.3.6 Use the Group's business entertainment expenses, office expenses, travel expenses, etc. to misappropriate benefits;

3.3.7 During holidays or festivals, personnel at all levels in leadership are strictly prohibited from accepting any gifts, cash, valuable vouchers or cards, digital red packets, and other benefits from relevant parties;

3.3.8 Give facilitation payments to facilitate or expedite the performance of routine duties or actions by government authorities;

3.3.9 During off-duty hours, privately contact business partners in any manner or provide their own private contact details to business partners;

3.3.10 Accept cash from business partners, have any private contact with them, or accept any entertainment, gifts, cash, valuable vouchers or cards, digital red packets or other benefits that exceed reasonable limits;

3.3.11 Engage in any other acts that seek private gain or harm the interests of the Group.

3.4 Subject to strict compliance with this policy and relevant laws and regulations, the following conduct, which is based on legitimate business needs and conforms to reasonable business courtesies, may generally be regarded as acceptable:

3.4.1 In the course of business meetings, seminars, trade exhibitions, industry exchanges or similar business activities, providing participants with gifts of a symbolic or low-value nature, such as souvenirs bearing the Company's logo or other items used for promotional and communication purposes;

3.4.2 Giving to or accepting from existing customers, suppliers and business partners promotional gifts of a symbolic or low-value nature, such as souvenirs bearing the Company's logo;

3.4.3 Other conduct that complies with this policy and relevant laws and regulations, is based on legitimate business needs, does not affect independent commercial judgment, and conforms to reasonable business courtesies.

3.5 Any gift or souvenir received by employees in connection with official duties shall be deemed as a gift to the Group. The relevant employees shall complete and submit a Declaration of Interests Form to the Group's designated approver to report and seek advice on how to handle the gift or souvenir received.

3.6 Employees shall decline to accept a benefit if such acceptance would affect their objectivity in handling the Group's affairs, or cause them to act against the Group's interests, or if acceptance of the benefit would be regarded or alleged as improper conduct.

4. Conflict of Interest

4.1 All employees shall avoid any conflict of interest (i.e. a conflict between a private interest and the interest of the Group) or any situation that may be perceived as a conflict of interest when conducting the Group's business. Employees shall make appropriate declarations to the Finance Department upon the occurrence of an actual or potential conflict of interest situation, including but not limited to the following circumstances:

4.1.1 Employees responsible for recruitment or promotion are family members, relatives or close personal friends of a candidate or an employee under consideration for promotion;

4.1.2 A director holds a financial interest in a company participating in the tendering process that is under consideration;

4.1.3 A full-time or part-time employee holds a part-time job or other form of employment with a contractor that he or she is responsible for supervising.

4.2 The Group adopts stringent monitoring measures for key processes such as tendering and procurement, to prevent conflict of interest situations where employees involved in procurement have a close relationship with or possess a financial interest in a supplier being considered by the Group. All employees involved in procurement and their management personnel shall declare any financial interest that they or their immediate family members may hold in any supplier, contractor or party that conducts business or competes with the Group. Employees involved in procurement and their management personnel shall sign an "Integrity and Self-Discipline Declaration" and an "Integrity Agreement" with the tendering parties, so as to strictly prevent fraudulent acts such as receiving kickbacks or engaging in private transactions.

5. Customer Acceptance Policy

5.1 When accepting new customers, each department shall formulate and comply with its customer acceptance and record-keeping measures, policies or procedures, which shall take into account factors such as the products and services offered, the type of customers and geographical locations.

5.2 When entering into contracts with enterprises or individuals that have business relationships with the Group, an "Integrity Agreement" or "Integrity and Self-Discipline Declaration" shall be attached to the contract, which both parties shall strictly abide by.

6. Sponsorship, Charitable Donations and Community Investment

6.1 The Group prohibits sponsorship, charitable donations or community investments made for the purpose of seeking improper benefits or business opportunities. All such activities shall strictly adhere to the principles of legality, compliance, openness and transparency, and shall not involve any illegal, dishonest or fraudulent acts, harm the interests or reputation of the Group, or contravene the Group's values and mission.

6.2 When conducting sponsorship, charitable donations and community investment activities, the Group shall comply with relevant laws and regulations as well as its internal rules and regulations, strictly screen the recipients, perform the corresponding decision-making procedures, and supervise and manage the use of funds.

7. Political Activities and Political Donations

7.1 The Group adheres to the principle of responsible political participation, and unless permitted by law and formally approved through established procedures, the Group shall not participate in political activities, nor shall it make any form of donation (including cash or in-kind) to any political party, political organisation, public official or candidate. The Group shall also fulfil the corresponding information disclosure obligations in accordance with relevant laws and regulations.

7.2 All employees, when engaging in political activities in their own time, shall comply with the relevant laws and regulations of the country or region where they are located, and shall not act in the name or from the standpoint of the Group, make use of the Group's resources, or harm the interests of the Group.

8. Monitoring and Whistleblowing Procedures

8.1 The Audit Committee of the Company (the "**Audit Committee**") (or such specific person(s) as it may designate from time to time) shall exercise supervision and management and conduct random inspections over the Company and its subsidiaries to ensure the implementation of this policy, and shall adopt the following management measures:

8.1.1 The Finance Department shall promptly report any issues identified during expense review to the Audit Committee for investigation and handling; and

8.1.2 The Audit Committee shall carry out random supervisory inspections of subsidiaries and functional departments from time to time, and refer the cases involving significant amounts to judicial authorities for handling.

8.2 The Group encourages internal employees, suppliers, customers and other stakeholders as well as members of the public to lodge real-name or anonymous complaints or reports on acts that violate laws, regulations or business ethics. Whistleblowing telephone numbers have also been established at various key positions and departments.

8.2.1 If employees discover any actual or suspected violation of this policy, or any other improper or fraudulent incidents or acts, they shall report it to the Audit Committee (or such specific person(s) as it may designate from time to time) or other appropriate persons or departments in accordance with the Group's Whistleblowing Policy or the whistleblowing channels and procedures stipulated in the relevant regulations (whistleblowing hotline: 0543-4161355), and report material issues to the Board of Directors (the "**Board**").

8.2.2 For whistleblowers who provide supporting evidence, rewards shall be granted upon verification of the report, and the information on whistleblowers shall be kept strictly confidential.

8.3 The Group has established disciplinary and handling procedures for potential violations. The Audit Committee shall first conduct an investigation into the issues discovered and reported, hear the representations of the persons being complained against, collect relevant evidence, perform the corresponding investigation, verification and handling procedures in accordance with laws and regulations, and handle the matter based on the outcome of the investigation and in accordance with the relevant systems.

8.4 Where an investigation confirms that an employee has committed a violation, the Group shall, based on the nature and severity of the act, impose disciplinary measures on the relevant responsible person, including but not limited to issuing a notice of criticism, warning, reassignment, demotion, dismissal or claiming compensation, etc. For acts in violation of laws and regulations involving suppliers, contractors, distributors, customers, agents, consultants and other third parties that have business relationships with or work for the Group, the Group shall decide to take measures such as terminating the cooperation, claiming compensation or other disciplinary measures as appropriate. In the event of any violation of applicable laws and regulations or any serious misconduct, the Group shall refer the matter to the relevant law enforcement authorities for investigation and pursue legal liability in accordance with the law.

9. Compliance with the Laws of the People's Republic of China, Hong Kong and Other Jurisdictions and the Group's Management Systems

9.1 All employees shall comply with national laws and regulations and the Group's various management systems, conduct business in accordance with the law, act with integrity, be honest and trustworthy, and earnestly safeguard the lawful rights and interests and good reputation of the Group and individuals. The relevant laws and regulations include but are not limited to the Anti-Money Laundering Law of the People's Republic of China, the Criminal Law of the People's Republic of China, the Prevention of Bribery Ordinance (Cap. 201 of the Laws of Hong Kong) and other relevant legislation, as well as internal rules and regulations such as the Anti-Fraud Measures and Control Procedures, and the Administrative Measures for Complaints and

Whistleblowing.

10. Training

10.1 The Group shall regularly provide all employees with anti-corruption and anti-bribery training, including retaining experts to deliver anti-corruption and integrity promotion training and distributing internally compiled anti-corruption publications, to ensure that all employees understand the Group's anti-corruption and anti-bribery policy and practices, and comply with the laws, regulations and standards of conduct relevant to their scope of business. The Group is committed to using diverse training methods, such as educational materials, corruption case studies, and warning videos, to remind leaders to be vigilant against improper transactions, thereby enhancing their awareness of resisting corruption and maintaining moral integrity.

11. Review of Policy

11.1 Each department of the Company shall convene an integrity meeting on a monthly basis, and the Chairman of the Board shall also convene integrity meetings on a regular basis, so as to review past cases of rule violations and disciplinary breaches and promote the strengthening of integrity building by the leadership of each department. The Group shall also review this policy regularly to ensure its effectiveness and make amendments as necessary.

12. Supplementary Provisions

12.1 The Board of Directors shall have the authority to interpret and implement this policy. The Board of Directors may apply this policy with flexibility based on actual circumstances.

12.2 This policy is available on the Group's website (www.hongqiaochina.com).