

SINOCHEN COMPLIANCE RESPONSIBILITY STATEMENT

Sinochem Compliance Obligation Convention

adWdfafa W egdWfZWUa_ bS` k abWsfW` Xg^Ua_ b`S` UWi [fZ `Si f Xg^`e [fe `WS^ dWba` eT[f[W`e fa fZWeaU[Wk U`W fe eZSdVZa `VW` W_ b`akW`e S` V afZW`efS] VZa `VW` S` V W egdWfZW`g^`_ b`W_ W fSf[a` aXYahW` [Y S` V abWsf[Y W fW`d[eWSUadV[Y fa `Si f fZWE[aUZW_ 5a_ b`S` UWA T`YSf[a` 5a` hW f[a` [eZW`k Xad_g`SfW XadS`efS fa ST[VWTK,

I. Uphold Laws and Disciplines, Maintain Reputation, and Fulfill Promises

#zEfd[Uf`k Ua_ b`k i [fZ Sbb`UST `W`Si e S` V dW`g`Sf[a` e S` V fZWUa_ bS` k dg`W`e S` V ba`U[W`z

\$z5a_ b`S` UWeZS`efS`f`Xa_ fZWfab i Z[WS`efS eZS`fS] WfZW[[fSf[hWfa Ua_ b`k`z %z`_ bSd[S`k S` V XS[fZ`Xg`k bca_ afWUa_ bS` k e VWhWab_ W fl eSXW`gSdV fZWUa_ `Z bS` k e [fW`eS` V dW`gSf[a` f S` V TW`WhafW` fa a` We ai` Vgfk Xad fZW[fW`e aXfZW Ua_ bS` k`z

&z? S[fS[dW`gSf[a` f Xg^`bca_ [eW`e S` V eg[f fZWSUf[a` fa fZW` adV`z

'z` UagdSYWdW`baf[Y aX` a` ZUa_ b`S` UWTK S`efS` z

II. Comply with Management Obligations Prescribed by Law

#z5a_ b`k i [fZ Sbb`UST `W`Si e S` V dW`g`Sf[a` e[SUU`b fZWSV_ [[efcSf[a` S` V egZ bW`h[e[a` [b`W_ W fW`Tk fZWYahW` _ W f S` V [fe dW`h`S` f SYW U[W`e [SUUadS` UWi [fZ fZW`Si f g` VW`fS] WegbW`h[e[a` Tk fZWbgT`[U fS] WfZWdW`ba` eT[f[W`e XadeaU[Wk S` V [`Z hW`efade`z

\$z5a_ b`k i [fZ S` V [b`W_ W f fZWSd[UW`e aXSeeaU[Sf[a` SbbcahW`Tk fZWW` f[fk fZSf bW`ad_e fZW[hW`efade Vgf[W`e /eZSdVZa `VW`f WefST`[eZ S` V efd[Uf`k [b`W_ W f i W`Z`W`z `W` S` V TS`S` UW` [fW`d S`egbW`h[e[a` S` V _ S` SYW_ W f ba`U[W`e S` V bca`fW`f fZW[fW`z W`e aX[hW`efade[UdW`[fa`e S` V afZW`efS] VZa `VW`z

%zEfd[Uf`k Ua_ b`k i [fZ fZWSeeW`Sbbcd[S`S` V `f` Y bca`UW`gdW`bca`dW`S_ [Sf[a` S` V SbbcahS`TW`adW`fcd` eSUF[a` e[Ua_ bW`f[hW`bgT`[U fcdS[Yf S` V aT`YSf[a` e aX[Xad` Sf[a`

V[eU'aegdW S` V ` af[USf[a` e Xad_ WdWd SUcg[e[f[a` f Wcg[fk adSeeW fdS` eSUF[a` el afZWd fZS` fZaeWSbbdahW Tk Ua` fca` Y eZSdWZa` VWdž

&ž@a Xg` Vel YaaVel eWh[UWd adafZWdSeeWfe eZS^TWbdah[VWV fa dWSfW bSdf[Wd i [fZŽ agf Ua` e[VWdSf[a` f S` V ` a fdS` eSUF[a` e i [fZ dWSfW bSdf[Wd eZS^TWUa` VgUfW Sf g` XS[d bd[UWdž

I [fZagf fZWUa` eW faXfZWW f[fk/eZSdWZa` VWd fZSf bWd ad_ e fZWWgf[Wd aXfZW[` hWdž fad` a` WaXfZWd` ai [Y Sufe eZS^TWS` ai W,

Ž7` fWd[Y [fa SYdWU_ W fe i [fZ dWSfW bSdf[Wd XdfZWfdS` eWdaXbdabWfk ad` aS` e ad bdah[V[Y YgSdS` fWVdWSfW bSdf[Wdž

Ž7efST` feZ[Y` a[f hW fgdM [fZ dWSfW bSdf[Wd ad[hWef[Y [W fWbd[eWd ai` W adW WUž f[hWk Ua` fca` W Tk fZW[dWUfad[e]gbWd[h[e]ad[e] eW [ad_ S` SYWd adfZWdU` a eWdWSf[hWdž

DWSfW bSdf[Wd dWVd fa fZWUa_ bS` k e V[dWUfad[e]gbWd[h[e]ad[e] eW [ad_ S` SYW_ W fi S` V fZWdU` a eWdWSf[hWd Se i W` Se fZWW fWbd[eWd ai` W ad WUf[hWk Ua` fca` W Tk fZWeWbWda` ež

` ž:f [e XadT[VWV fa W fWd[fa Ua` fdSufe a` TWZS` XaXfZWUa_ bS` k adW YSYW[` afZWd Ua` VgUf fZSf _ Sk ZShWUa` a_ [U S` V` W` S` Ua` eWcgW UWd a` fZWUa_ bS` k i [fZagf SgŽ fZad[Sf[a` adW UWW fZWhS` V` W` S` SgfZad[Sf[a` ž

(ž6[fYW f` k bWd ad_ Vgf[Wd S` V Seeg_ WfZW` ST[f` k XdfZWT dWSUz aXegUZ Vgf[Wdž) ž3` k XSTd[USf[a` f XS` e[XUSf[a` f fs_ bWd[Yf e[Y` [Y ad[eeg[Y aXUa` fdSUF eWUgd[fk[VaUg_ W fsf[a` f` afW dWUW[bf SUUag` f[Y dWb adfel ad efSf[ef[Ue fZ Sf SdW` af Ua` e[efW f i [fZ fZWSUfe [e efd[Uf` k bcaZ[T fWVž

*ž? S` adVWU[e]a` Ž_ S] [Ye eZS` af h[a` S` fWSbb` UST` WdWg` Sf[a` e S` V Ua_ bS` k dg` Wd S` V ba` U[Wdž

III. Comply with Statutory Obligation of Tax Payment

#ž5a_ b` k i [fZ hSd[age` Si` e S` V dWYg` Sf[a` e Sbb` UST` W[` 5Z[` S` S` V afZWd Uag` fd[Wd /dWY[a` efii ZWVfZWT ge[` Wee [e Ua` VgUfW f bWd ad_ fsj Sf[a` aT` UYSf[a` el S` V SUf[hWk bWdž Xad_ fZWaT` UYSf[a` aXi [fZ Za` V[Y S` V bSk[Y fsj Wdž

\$ZDWFS[fdjWS` V Ua_ b`WfWfSj ZdWSfW_ SfWdS`e Se dWcg[dW Tk fSj Sf[a` SgfZad[fWet
S` V V[eU^aeWfSj [` Xad_ Sf[a` Se dWcg[dWZFSj dW[efcSf[a` S` V fSj VWU`ScSf[a` eZS^TW
Ua` VgUfW SUUadV[Y fa `Si -S` k Ua` UWS^_ W fl a_ [ee[a` t ad_ [eefSfW_ W f [e efdUf`k bcaZ
Z[T [fWZ

%Z 7` egdWTge[Wee abWSf[a` e Ua_ b`k i [fZ Sbb^UST`WfSj `Si e S` V dWg`Sf[a` eZFSj
WhSe[a` t fSj VaVY[Y adXSgVg`W f fSj bdWVW UWe SdWefdUf`k bcaZ[T [fWZ

IV. Comply with Legal Employment Obligations

#ZDWebWUf S` V bcaFWUf fZW`WfS^dYZfe S` V [fWdWefe aXW_ b`akWWe t S` V `af U[dJg_ Z
hW f fZWg^ ^_ W f aX`WfS^aT ^YSf[a` e fa W_ b`akWWeZ

\$Z3` k V[eUd_ [` Sf[a` S` V ZScSee_ W f eZS^TWbcaZ[T [fWt [U`gV[Y Tgf` af ^_ [fW
fa V[eUd_ [` Sf[a` adZScSee_ W f a` fZWYdag` V aX` Sf[a` S`fkt dSUW WfZ` [U[fkt dW[Y[a` t
YW VWd SYW_ Sd[fS^efSfge t S` V bZke[US^Ua` V[f[a` t WfUz

V. Comply with Anti-corruption Obligations

#ZEWf WjS_ b`WS` V dW[ef Ua ddbf TWZSh[ad S` V fZWa`^ai [Y SUfe SdWbcaZ[T [fW,
Z3TgeWaxbai Wd S` V [Xd[YWgba` fZWdYZfe S` V [fWdWefe aXfZWUa_ bS` k S` V
eZSdZa`VWdeZ

ZFS[[Y SVhS` fSYWaXSgfZad[fk XadbWea` S^YS[S` V USgeWWS_ SYWfa fZW[fWdWefe aX
fZWUa_ bS` kt fZWW f[fW eadegTe[V[SdWdeZ

Z6[hWe[a` t W_ TWI `W_ W fl ad_ [eSbbcbdq[Sf[a` aXUa_ bS` k bca bWf`kZ

ZA Wd[Y adSUUWb f[U

fdShSYS` f ebW V[Y fZSf[e[h[a`Sf[a` aXdWWhS` f dWg`Sf[a` ež

&ž 8g`k Ua__ b`k i [fZ fZWG@ 5a` hW f[a` SYS[ef 5adggbf[a` S` V afZVd[fVd Sf[a` S^ Ua` hW f[a` e fa i Z[UZ 5Z[S ZSe SUUWVWl ST[VWTK fZWS` f[ZUadggbf[a` `Si el dWg`Sf[a` e S` V dWg`Sfack ba`U[Ve Sbb`U`UST`W[fZWLag` fd[Ve/dW[a` efii ZWdWfZWTge[Wee abWdSfVe S` V fa dWWhS` f Tge[Wee SUf[h[f[Ve S` V bdaZ[T[f bSk_ W f [S` k Xad_ aXbdabWfK adbdaz h[V[Y eWd[UVe WUzfa bgT`Ua U[S`e ade[[SdbWba` `W`ad Ua__ WU[S^SVhS` fSYWad afZVd[bdaWd[fVdVef S` V W egdWfZWSUUGdSfW bdaWd S` V Ua__ b`WdW WUf[a` aXS`^ ahWdVSe Wj bW V[fgdV[fZWL a_ bS` keTaa]e S` V SUUag` f[Y dWUadVež

VI. Comply with Obligations on Safety in Production, Health, and Environmental Protection

#ž 3↑ Ske bd[a d[f[WeSXWbdaVgUf[a` † efd[Uf`k Ua__ b`k aT`Y Sf[a` e [SUUadV S` UWi [fZ fZWdWWhS` f `Si Sbb`U`UST`Wfa eSXWk [bdaVgUf[a` † W egdWfZ WeSXWk aXfZWbdaVgUf[a` bdaUWe S` V bdaVgUf[e] bdWhW fl dVefdS[† S` V dWbadf S` k bafW f[S^adSufgS^ZSI SdV dWSfWV fa fZWeSXWk S` V ZV S`fZ aXfZWW_ b`akWVe fZWbgT`Uf U`UW fe WUz dVeg`f[Y Xa__ g` eSXW Ua` V[f[a` aXfZWbdaVgUf[a` bdaUWe S` V fZWbdaVgUf[S` V WUa` a_ [U addWbgfSf[a` VS_ Ž SYWUSgeW Tk eSXWk [U[VW fž

\$ž 7efST`eZ[[bdaHWS` V [b`W_ W f`STadeSXWk S` V ZV S`fZ ekefW_ † bdWhW f eSXWk SUU[VW fe S` V dWgUWaUUGbSf[a` S^ZSI SdVež

%ž 5a__ b`k i [fZ Sbb`U`UST`WWh[da` _ W f bdaWUf[a` /W Wd`k Ua` eWdSf[a` S` V WUa` aYŽ [US^W h[da` _ W f bdaWUf[a` fi`Si e S` V dWg`Sf[a` e [5Z[S S` V afZVdUag` fd[Ve/dW[a` e i ZWdWfZWTge[Wee abWdSfVe bW`ad_ aT`Y Sf[a` e g` VVd W h[da` _ W f bdaWUf[a` `Si e S` V dWg`Sf[a` el bdWhW fl dVefdS[† S` V dWbadf bafW f[S^adSufgS^d[e] S` V [U[VW faXW h[ž da` _ W fS^ba` g`f[a` S` V ZSI SdVž

&ž 4ge[Wee bSd` Wde i Za bdaH[VWeWd[UVe fa fZWL a_ bS` k a` Že[fWeZS`^TWegTWUf fa fZWeS_ WefS` V SdVe aXeSXWk _ S` SYW_ W f Se Sbb`U`W fa fZW5a__ bS` kž

VII. Comply with Anti-monopoly Obligations

#ž 4WZ Sh[a de fZSf [bW WfdSVW dVefd[Uf ad Wj U`gVWXS[d Ua__ bWf[f[a` eZS`^ af TW

Ua` VgUFWz

\$ZFZWbd[U[b^WaXS[dUa_ bW[f[a` f S` f[Z_ a` aba`k`^Si` S` V fZWS` f[fdef`^Si` e aXhSdZ`
age Uag` fd[We eZS^^TWaTeWhWz

%z? a` aba`k` SYdWV_ W fei [fZ fZWW WUfaX_ S` [bg`Sf` Y_ Sd] Wf bd[We eZS^^TWSHa [VWz`
&z5a_ b`k` i [fZ Sbb^[UST`^WS` f[Z_ a` aba`k`^Si` e aXfZWdWhS` f`gd[ev[Uf[a` e_ _ S] W
dWcg[dW_ _ WdYdUa` fca` ^ f` Y dVSWW fa_ WdYd` SUCg[e[f[a` adWcg[fk adSeeWf fcs` eSUZ`
f[a` ež

VIII. Comply with Obligations Against Unfair Competition

#z3ha[V eWV[^ Y fcsV[^ Y abba`fg` [fk adV[edgbf XS[dUa_ bW[f[a` i [fZ afZWabWsfad`
fZdagYZ fZWSVabf[a` aX_ VS` e fZSf h[a` SfWYW Ws`^k` SUWbFW Tge[` Wee WZ[Uež

\$z5a` eU[age`k` _ S[` fS[` fZWS[d Wee aXfZW_ Sd] Wf adWd Sha[V Uda i V[^ Y agf Ua_ bWZ`
[fad` XdfZWbgd`baeWaXeW^` Y YaaVe adbdah[V[^ Y eWh[UWe Sf bd[UWe TWa i Uaefz`

%z3ha[V eWV[^ Y YaaVe adedWh[UWe SYS[` ef fZWi [eZWe aXfZWbgdJZSeWdadSffSUZ afZWd`
g` dVSea` ST`^Ua` V[f[a` ež

&zBw`b`^WeZS^^ afTWdWefdufW Xa_ bgdJZSe[^ Y VVe[Y` SFW YaaVe adedWh[UWež`
' žEfd[Uf`k` aTeWhWSbb^[UST`^W[fWd` Sf[a` S^S` V Va_ Wef[U`^Si` e a` S` f[Zg` XS[dUa_ bWZ`
f[f[a` ž

FZWX`^ai [^ Y SUf[h[f[We SdWefduf`k` bcaZ [T [fW,

Z5ag` fWdWf[^ Y-

Z8S`eWSVhWd[e[^ Y-

Z5a`^ge[hWT [VV[^ Y-

Z5a`_ _ WdU[S^T d[TWk-

Z` X[` YW_ W.fgba` fcsVWeWdWfe-

Z6S`_ SYWfa Tge[` Wee dWbgfSf[a` ž

IX. Comply with the Regulations on the Maintenance of Financial Order and Anti-money Laundering Obligations

#z;f [e XadT [VVW fa W YSYWadbSdf[U[bSfW[^ XSGVg`^W f` ^ S` U[S^Suf[h[fk-adfa Ua` VgUf

S` k Xad_ aXVWUWbfa` fa YW S` aS` ad Xad XadWY` WYUZS` YWfdS` eSuf[a` e-adfa Ua` VgUf
S` k [^WYS^ebWUg`Sf[hWTgk[Y adeW^ Y aXUdW[f XSU[ffk ad XadWY` UgddW Uk- adfa WhSVW
` S` U[S^dWg`Sf[a` eTk [_ bcbWd_ W S` e-adfa W YSYWadbSdf[U[bSfW[fZW ` S` U[S^TgeZ
` Wee [h[a`Sf[a` aX_ Sd] Wf SUUWe Ua` V[f[a` e-adfa bcah[VWYgScS` fWWe XadS` k [V[h[VgS^
adXadS` k W f[fk agfe[VWfZWUa_ bS` k adS` k [V[h[VgS`z

\$z:f [e XadT [VWV fa See[ef fZWWYS`f] Sf[a` aX[^Uf bcaUWWe aXS egebWUfW Ud_ WfZW
Xa`ai [Y TVZSh[a de SdWbcaZ [T [fW,

Z>WSeWadbcah[VWUSb[fS^SUJag` f fa afZWb-

Z3ee[ef fZWfZ [dV bSdfk fa Ua` hWf bcbWf k [fa USEZt ` S` U[S^ [efdg_ W fe ad_ Sd] WfZ
ST WeWUgd[fWez-

Z3ee[ef fZWfZ [dV bSdfk fa fdS` eXWdXg` Ve-

Z3ee[ef fZWfZ [dV bSdfk fa Ua` hWf Xg` Ve [fa fS` Y[T WSeeWfe fa V[eYg[eWfZ WeagdUWS` V
` SfgdWa XegUZ Xg` Vež

%ž5a` VgUf Tge[Wee i [fZ U^W fel [fWd_ W[Sd]Wef S` V Tge[Wee bSdf` Wee i [fZ `W[fZ
_ SfWS` V dWb gST W Xg` Ve eagdUWz

X. Comply with Export Control and Economic Sanction Obligations

#žG` VWefS` V S` V Xg`k Ua_ b`k i [fZ fZWaT ^YSf[a` e g` VWd fZWdWYg`Sf[a` e XadWY badf
Ua` fca`S` V WUa` a_ [U eS` Uf[a` e [_ b`W_ W fW Tk 5Z [St afZWdUag` fdWef S` V [fWd Sž
f[a` S^adYS` [Sf[a` e egUZ Se fZWG@i i Z [UZ SdWSbb ^UST Wfa dWWhS` f Tge[Wee Suf[h[f]We-
Tge[Wee Suf[h[f]We eZS^^ af TWUa` VgUfW [h[a`Sf[a` aXdWYg`Sf[a` e Tk U[dJg_ hW f[hW
XSgVg`W f adafZWd_ W S` ež

\$ž5a_ b`k i [fZ fZW`Si e S` V dWYg`Sf[a` e a` [_ badf S` V WY badf SV_ [[efdSf[a` t Ua_ ž
b`k i [fZ fZWdWg[dW_ W fe aXUgefa_ e egbWch[e]a` t S` V Sha[V e_ gYY^ Yf V[eYg[eW e_ gYž
Y^ Y S` V S` k afZWd Xad_ e aXh[a`Sf[a` e fa U[dJg_ hW f Ugefa_ e egbWch[e]a` ž

XI. Comply with the Obligations of Truthful and Accurate Financial Reporting and Disclosure Obligation of Listed Companies

#žBWad_ fZWaT ^YSf[a` e g` VWd SUJag` f[Y `Si et W egdWfZSf fZWSUJag` f[Y _ Sž

fWd[S^el Taa] el S` V X[S` U[S^dWbadfe SdWfdgW SUUgdSfW S` V Ua_ b`WVzEgT_ [f bca_ bfl
fdgW Ua_ b`WV S` V SUUgdSfW ` S` U[S^SUUag` f[Y [Xad_ Sf[a` fa fZW[hWefadl fSj Sf[a`
SgfZad[f[Wel dWWS` f YahWd _ W f SYW U[Wel S` V dWWS` f eFS] WZa`VWde aXfZWUa_ bS` k [`
SUUadVS` UWi [fZ `Si eS` V dWg`Sf[a` eS` V Sbb`[UST`WSdf[UWde aXSeeaU[Sf[a` ž

\$ž5a_ b`k i [fZ eUS^dWg`Sf[a` e- Z[VVW dWdWde ada ŽTaa] SUUag` f SdWefdUf`k
bcaZ[T fWž

%ž5a_ b`k i [fZ dWWS` f bcah[e a` e aXfZWeWUgd[fk `Si eS` V eWUgd[fk Wj UZS` YW`Si e aX
5Z[S` S` V afZWdWWS` f Uag` fd[W- Xg^ ^^fZW[Xad_ Sf[a` V[eU`aegdWaT`YSf[a` [S f[Wž
kl fdgfZg`SUUgdSfWS` V Ua_ b`WV_ S` ` Wž

XII. Comply with Data Protection and Information Security Obligations

#ž4WdWeba` e[T`WXadVSfS eWUgd[fk S` V [Xad_ Sf[a` eWUgd[fk Vgd[Y fZWSbb`[USf[a` aX
VSfSž

\$ž6gd[Y fZWUa`WUf[a` S` V _ S` SYW_ W faX[Xad_ Sf[a` S` V VSfS,

ŽZS^^ af eFVS^Ua_ bS` k [Xad_ Sf[a` S` V bWde` S^VSfS- addWSeWbcaZ[T fW [Xad
_ Sf[a` -

ŽZS^^ af eW` gb adgeW_ S[U]age bcaYdS_e [fW f[a` S`kl addWSeWS` V fdS` e_ [f [Ž
Xad_ Sf[a` fZSf [e bcaZ[T fW Tk `Si e adS` V dWg`Sf[a` ež

ŽZS^^ af eFVS` dWdW` V[eU`aew fS_ bWdi [fZ] adVS_ SYWUa_ bS` k [Xad_ Sf[a` S` V
bWde` S^VSfS [fZWUa_ bS` k ebaeeWde[a` ž

ŽZS^^ af Vai` `aSV adfdS` eWd[badfS` f bWde` S^[Xad_ Sf[a` adUadbadfWWSfS fa
bWde` S^_ aT[`WVSfS fdS` e_ [ee[a` VWh[UWde [fZagf SgfZad] Sf[a` ž

ŽZS^^ af USdk adfdS` e_ [f agf aXfZWUag` fdk [Xad_ Sf[a` fZSf _ Sk S` WUf` Sf[a` S^
eWUgd[fk] ZSd_ bgT`[U[fWdWefel [bSuf fZWeWUgd[fk aXUa_ bS` k [Xad_ Sf[a` f S` V bWde` S^
[Xad_ Sf[a` i [fZagf fZWUa` eW f aX[fe ai` `WdadfZSf _ Sk [Xd` YWgba` [V[hVgS^` fWž
Wefež

XIII. Comply with Confidentiality Obligations

#ž8g^ `^aT`YSf[a` e fa]WVb Ua_ bS` k e fdSVWeWUdWfe S` V bcafWUf fZWUa` VW f[S^ [Ž

ᖃd_ Sf[a` aXfZWUa_ bS` k S` V fZWW f[fkł fZWdWWS` f Ua` VW f[S^` ᖃd_ Sf[a` aXU`W fe eZS`TW] Wbf Ua` VW f[S^` SUUad/S` UWi [fZ `Si el dWg`Sf[a` eS` V Ua` fdSUF bdah[e]a` ež \$žEfd[UF`k Ua_ b`k i [fZ dWWS` f SV_ [[efdSf[a` dWg`Sf[a` e dWSdV` Y fZWbdah[e]a` aX Ua` VW f[S^` ᖃd_ Sf[a` fa fZ[dV bSdf]Wēž

XIV. Comply with Obligation to Avoid Insider Trading

Efd[UF`k Ua_ b`k i [fZ fZWbdah[e]a` e aXUd_ [S^`Si f eWUgd[f]Wē `Si f dWWS` f `Si e S` V dWg`Sf[a` e aXfZWUag` fdk S` V dW[a` [i Z[UZ fZWUa_ bS` k [e `aUSFWł Se i W`Se fZW bdah[e]a` e aXfZWdWWS` f dg`Wē S` V dWg`Sf[a` e aXfZWUa_ bS` k S` V fZWW f[fkł S` V fZW ᖃ`ai [Y SUfe SdWbdaz[T]fW,

ŽSa_ bS` [Wē [V[h[VgS`e adebWU] U dWSfW bWda` e geW[e[VWd [ᖃd_ Sf[a` fa fdSVW SeeWfe ad `S` U[S^`eWUgd[f]Wēž

Žb[eU`aeW[e[VWd [ᖃd_ Sf[a` fa `a` ŽTge[WēždWSfW bWda` el fa bWda` e i Za ZShW `afe[y` VW S` a` Ž[eU`aegdWSYdWU_ W f adfa ebWU] U dWSfW bWda` ež

ai [Y` ad_e,

Žha[V [Xl[YW_ W f aXfZW[fW^WUfgS^bdabWfkdYZfe aXfZWfZ[dv bSdfk-

ŽA TfS[dWWhS` f [UW eWS` V dMSUZ SYdW_ W f i [fZ fZWdYZf Za^VWd Xadge[Y
fZ[dv ŽbSdfk [fW^WUfgS^bdabWfkdYZfe/[U'gV[Y Ua_ bgfWdeafXi SdWfz

Ža` VgUf [cg[dVea` dWWhS` f [fW^WUfgS^bdabWfkdYZfe [S f[_ Wk_ S` Wdi ZW
dVdSdJZ[Y S` V VWhWab[Y` W` bdaVgUfeS` V fWUZ` a`aY[Vež

ŽSdka gf dVdSdJZ S` V S` S'ke[e aXfZW[fW^WUfgS^bdabWfkdYZfe [fZWfSdWf Uag` Ž
fdV/dW[a` efiXadahVdVSe [fW^WUfgS^bdabWfkdYZfe UaabVdSf[a` ž

%ž 7efST [eZ S` V Ua_ b`k i [fZ Sbb [UST^WSV_ [[efdSf[a` _ VSegdVe fa bdWhW f S` V
_ S` SYWfZWbafW f[S^adSufgS^ [Xl[YW_ W f aX[fW^WUfgS^bdabWfkdYZfež

XVI. Ensure Compliance by Business Partners

#ž8g`k g` VVdS` V Tge[Wee bSdf` WdS` V VdST [eZ UadVba` V[Y Ua_ b [S` UWefS` Ž
VSdVe XadVdSf` Ye i [fZ Tge[Wee bSdf` Wdž

\$žFZWUa_ b [S` UWbZ[`aeabZk S` V Ua_ b [S` UWdVcg[dW_ W fe aXfZWUa_ bS` k eZS^TW
Ua_ _ g` [USFW S` V [b`W_ W fW fa Tge[Wee bSdf` WdS` V Tge[Wee bSdf` Wd eZS^TWdVž
cg[dW fa dVebWUf S` V g` VVdS` V fZWUa_ bS` kie Ua_ b [S` UW_ S` SYW_ W f dVcg[dW_ W fe
XdTge[Wee bSdf` WdS` V fa Ua_ b`k i [fZ fZWdWWhS` f bdah[e[a` e aXfZ[e 5a` hW f[a` [Ž
ha`h[Y Tge[Wee bSdf` Wdž

>Wf ge i ad] faYfZWd fa gbZa V fZWE[aUZW_ 5a_ b [S` UWA T [YSf[a` 5a` hW f[a` †

FZWE[aUZW_ 5a_ b[S` UMDWeba` eT[1fk 3YdWV_ W f[e WjWUgFW fa W ZS` UMa_ b[Z
S` UW_ S` SYW_ W fl W egdWV WUf[hWbWda_ S` UWaXUa_ b[S` UMDWsfW Vgf[We eWf XdfZ
Ua_ b[S` UWtag` VSd[We S` V_ d_ k WeST[feZ Taffa_ Z[WUa_ b[S` UW_ [VeWfz; ZWWTk
g` VV[S] Wa` TWZS`XaX S` V
_ keWXfa efdUf`k Ua_ b`k i [fZ fZWE[aUZW_ 5a_ b[S` UW? S` SYW_ W f DWg`Sf[a` S` V
bWda_ S^Ua_ b[S` UMDWsfW Vgf[We Se ebWU[W [fZWE[aUZW_ 5a_ b[S` UWA T[YSZ
f[a` 5a` hW f[a` z

I. Company's Compliance Management Objectives

FZWUa_ bS` k S[_ e fa efS` VSd[il WTge[We abWsf[a` _ S` SYW_ W fl [bcahWUaZ
baSfWYahW S` UWUSbST[1fk Se bW`Si f bWfW f_ S`ad`WS^Ua_ b[S` UWd[e] et W egdW
`WS`k Ua_ b[S` f Tge[We abWsf[a` f_ S[fS[E[aUZW_ e Ua`baSfW[fWd[We S` V dWZ
gSf[a` f S` V ZWb [fZWTg[V[Y aXS i adVZU`See Y`aTS`k Ua_ bW[f[hWW fWd[WeWfZdagYZ
fZWWeST[feZ_ W f S` V bWUf[a` aXfZW5a_ bS` ke Ua_ b[S` UW_ S` SYW_ W fekefW_ z

II. Company's Compliance Management Philosophy

5a_ b[S` UWeZS^efSd` Xa_ fZWfab i Z[WS^efS` eZS^fS] WfZW[[f[Sf[hWfa Ua_ b`k
efSk STahWfZWTaffa_ f` WaXUa_ b[S` UWd[e] et _ S] WbdSuf[US^Ua_ b[S` UWW adfe S` V
UdVsfWhS`gWfZdagYZ Ua_ b[S` UWz

III. Compliance Responsible Party

3^E[aUZW_ W f[f[We S` V W_ b`akWWe SdWUa_ b[S` UWdWeba` eT`WbSd[WeZA` eY` [Y
fZ[e 3YdWV_ W fl W SUZ dWeba` eT`WbSd`k eZS^Seeg_ WfZWdWeba` eT[1fk aXUa_ b[S` UW
_ S` SYW_ W fl S` V Ua` VgUf Ua_ b`dVZW e[hWUa_ b[S` UW_ S` SYW_ W f aXfZWbWda` ` W
g` VVd_ S` SYW_ W f S` V fZW_ SffWb fZVk SdWdWeba` eT`WXd bcaUWeWf S` V Seeg_ WfZW
dWeba` eT[1fk` SQ !— ! [USQ W ` q ` ` W !— Y Wbq

FZWUa_ bS` k SVabfe S I Wda fa` WdS` UW ba` UK XadS` k h[a` Sf[a` t S` V W Uag dSYWd
WhWk W_ b` akVWfa dWbadf Ua_ b` S[t S` V SVh[eWa` S` k` a` ŽUa_ b` S` UWž7hWk e[` Y` Wh[a` Ž
`Sf[a` i [^TWWS`fi [fZ eWd]age`kž

IV. Compliance Obligations and Duties

5a_ b` k i [fZ `Si` et dWbWUf dg`Wd XefWd S Ua_ b` S` UWŽTSeW _ [`VeWf SU]` ai` WYVW
Ua_ b` S` UWUd[fWd]S[S` V b dSuf[UWfZ WUa_ b` S` UWbZ[`a eabZkž8a` ai` fZWE[` aUZW_ 5a_ Ž
b` S` UW? S` SYW_ W f DWg`Sf[a`` Se S Yg[VW[` WaXSuf[a` t aTeWdhWfZWE[` aUZW_ 5a_ Ž
b` S` UWA T`YSf[a`` 5a` hW f[a` t ST[VWTk fZWUa_ bS` k e Sdf[UWd aXSeeaU[Sf[a` t dg`Wd S` V
dWg`Sf[a` et S` V Ua_ b` k i [fZ S` Sbb`U`ST`W`Si` et [` fWd` Sf[a` S` Ua`VWd S` V Ua` hW f[a` et
S` V S` S` V gefd[S` ad_ e Sbb`U`ST`W`fa fZWaTžI ad] X[fZ Xg`k S` V V[`YV` f`ki b dafWUf fZW
[` fWd`Wfe aXfZWUa_ bS` k i _ S[` fS[` Ua_ bS` k dWb g`Sf[a` t eSXWgSd/ Ua_ bS` k eWUdWf et S` V
dWd`a` g`fWk dWd`ef S` k [^WWS`ad` a` ŽUa_ b` S` f` Suf[a` et i Z[UZ _ Sk USgeWfZWUa_ bS` k fa
TWegebWUfW aXh[a` Sf[a`` aX`Si` eadi Z[UZ SdWY b dWd`k b dZ[T` fWž
8a` ai` fZWUa_ bS` k ž ž

3Uf[hWk bSd[U[bSfW[Tg[V[Y fZWUa_ b[S` UWekefW_ fZdagYZagf fZWW fWbd[eWS` V
eSXWgSdV fZWW WUf[hWabWbSf[a` aXfZWUa_ bS` k eUa_ b[S` UWekefW_ ž

31 Ske_ S[fS[Si SdW Wee aXUa_ b[S` UWdWcg[dW_ W fe S` V fS] WdWba` e[T[f[k Xad
fZWUa_ b[S` UWaXa` We ai ` TWZSh[ad bWba` ` Wg` VWd_ S` SYW_ W fl S` V _ SffWb dca Ž
UWeWž

3UWb f S` V UaabWbSfWi [fZ fZWUa_ b[S` UWSgV[f S` V dW[h[W † S` V SUWb f bgT †U eg Ž
bW[h[e[a` a` Ua_ b[S` UWž

VI. Handling of Violations

; ZWdWk g` VWbS] WS` V i SdS` f fZSf; i [^Ua` Xad_ fa fZWUa_ bS` k eUa_ b[S` UWdWž
cg[dW_ W fe TWSUlag` fST Wfa fZWW[dWUf egbW[h[e ad fZWUa_ b[S` UWaT †YSf[a` e S` V
bWba` d_ S` UWaXUa_ b[S` UWVgf[W e S` V SUWb f fZWegbW[h[e[a` Tk fZWW[dWUf egbW[h[e ad
TSeW a` fZWaT †YSf[a` e ebWU[US^k eWf XadZ ZWdW ž; USeWaXS` k h[a Sf[a` †; S_ i [^ Y
fa TWSddWWhS` f †ST[f[W e [Ug dW [SUUad/S` UW i [fZ `Si e S` V Sbb †UST Wdg We S` V ba Ž
[UWe aXE[aUZW_ † SUWb f VWgUf[a` aXfZWbWba` d_ S` UWWhS` gSf[a` aX_ k Ua_ bS` k S` V
_ keWXS` V TWSdS^dWWhS` f Ua` eWcgW UWe Sd[e[Y fZWdWka_ ž

FZ[e E[aUZW_ 5a_ b[S` UWdWba` e[T[f[k 3YdWV_ W f eZS^TWVWUg fW [fi a Uab Ž
[We S` V eZS^fS] WW WUf gba` e[Y` [Y Tk fZWbSd[W e ZWdWfa S` V eZS^dW_ S[W WUf[hWf[
fZWVSfWaXWj b[dk aXa UWad fWd_ [Sf[a` aXfZWW_ b`ak_ W f Ua` fdSuf aXfZWUa_ b[S` UW
dWba` e[T WbSdfkž

6[dWUf SgbW[h[e ad

6SfW

DWba` e[T WBSdfk,

6SfW



sinochem

In science we trust