SINOCHEM COMPLIANCE RESPONSIBILITY AGREEMENT

Sinochem Compliance Obligation Convention

;` adVWdfa W egdWfZWUa_ bS`k abWdSfWe [` Xg^^Ua_ b`[S` UWi [fZ ´Si łXg^ ^e [fe ´WYS^ dWeba` e[T[´[f[We fa fZWeaUWfkł U´[W feł eZSdWZa´VWdeł W_ b´akWWe S` V afZWdefS]WZa´VWdeł S` V W egdWfZWXg^^[_ b`W_W fSf[a` aXYahWd [` Y S` V abWdf[` Y W fWdbd[eWSUUadd[` Y fa ´Si ł fZWE[`aUZW_ 5a_ b´[S`UWA T´[YSf[a` 5a`hW f[a` [e ZWdWTk Xad_ g´SfWV XadS^^efS` fa ST[VWTk,

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

#žEfd[Uf^k Ua_ b´k i [fZ Sbb´[UST´W´Si e S` V dWg´Sf[a` e S` V fZWUa_ bS`k dg´We S` V ba´[U[Wež

$ž5a_ b´[S` UWeZS^^efSdfXda_ fZWfab i Z[WZS^^efS eZS^^fS]WfZW[` [f[Sf[hWfa Ua_ b´kž

%ž;_ bSdf[S^k S` V XS[fZXg^´k bda_ afWUa_ bS`k e eWhWab_ W f[eXWW´gSdV fZWUa_´Ž bS`k e[`fWdWefe S` V dWbgfSf[a`ł S` V TWWWhafWW fa a`We ai `Vgfk XadfWW[`fWdWfa XfZW Ua_ bS`kž

&ž?S`fS`dWbgfSf[a`łXg^ ^bda_ [eWe S` V eg[ffZWSUf[a` fa fZWi adVž

'ž7`UagdSYWdWbaadf[` Y aX`a`Žua_ b´[S`UWTk S^^efS ž

II. Comply with Management Obligations Prescribed by Law

#ž5a_ b´k i [fZ Sbb´[UST´W´Si e S` V dWg´Sf[a`eł SUUWbf fZWSV_ [` [efdSf[a` S` V egŽ bWdh[e[a` [_ b`W_W fWW Tk fZWYahWd _W f S` V [fe dWWhW´f SYW U[We [` SUUadVS` UWi [fZ fZW´Si ł g` VWdfS]WegbWdh[e[a` Tk fZWbgT´[U[fS] WfZWdWdWeba` e[T[´[f[We XadeaU[Wfk S` V [` Ž hWfadež

$ž5a_ b´k i [fZ S` V [_ b`W_W f fZWSdf[U´We aXSeeaU[Sf[a` SbbdahW Tk fZWeWf[fk fZSf bWdXad_ e fZW[` hWefade Vgf[We /eZSdWZa´VWdfl WefST´[eZ S` V efd[Uf´k [_ b`W_W f i W´ŽVWŽ `WW S` V TS´S` UWW [` fWd`S^egbWdh[e[a` S` V _ S` SYW_ W f ba´[U[Weł S` V bdafWUf fZW[` fWdŽ Wefe aX[` hWefadeł UdW[fadełS` V afZWdefS] WZa´VWdež

%žEfd[Uf^k Ua_ b´k i [fZ fZWSeeWfSbbdaS[eS^S` V `[` Y bda UWWgdWbdacaddWS_ [` Sf[a` S` V Sbbdaha^S^TWXadWatdafS` eSUf[a`eł Ua_ bWf[fZ[hWbgT´[U fdaSV[`Y fl S` V aT´[YSf[a` e aX[` Xad_ Sf[a`

III. Comply with Statutory Obligation of Tax Payment

$žD\We[‛ fdgWS‛ V Ua_ b‚WfWfSj‏ŽdWSfWW _ SfWd[S‑e Se dWcg[dWW Tk fSjSf[a‛ SgfZad[f[Wel S‛ V V[eU‑aeWfSj [‛ Xad_ Sf[a‛ Se dWcg[dWW‏žFSj dWe[efdSf[a‛ S‛ V fSj VWU‑SdSf[a‛ eZS^^TW Ua‛ VgUfWW SUUadV[‛Y fa ‑Si -S‛k Ua‛UWS^_Wfla_ [ee[a‛ł ad_ [eefSfW_Wf [e efd[Uf‑k bdaŽ Z[T[fWW‏ž

%ž7‛ egdWTge[‛Wee abWdSf[a‛e Ua_ b‑k i[fZ Sbb‑[UST‑WfSj ‑Si e S‛ V dWYg‑Sf[a‛ež‏FSj WhSe[a‛ł fSj VaVY[‛YadXdSgVg‑W ffSj bdWXWdW‑ UWe SdWefd[Uf‑k bdaŽ Z[T[fWW‏ž

IV. Comply with Legal Employment Obligations

#žDWebWUf S‛ V bdafWUf fZW‑WWS‑d[YZfe S‛ V [‛fWdWefe aXW_ b‑akWWel S‛ V ‛af U[dUug_Ž hW‑ffZWXg^ ^_W faX‑WWS‑aT‑[YSf[a‛e fa W_ b‑akWWež

$ž3‛k V[eUd[_[‛Sf[a‛ S‛ V ZSdSee_W f eZS^^TWbdaŽZ[T[fWWł [‛ U‑gV[‛Y Tgf‛ af ‑[_[fWW fa V[eUd[_[‛Sf[a‛ adZSd See_Wf a‛ fZWYdag‛ V aX‛ Sf[a‛S‑[fkł dSUWł WfZ‛[U[fkł dW‑[Y[a‛ł YWVWdSYW‛ Sd[fS‑efSfgel S‛ bZke[Ua‑Ua‛ V[f[a‛ł WfUž

V. Comply with Anti-corruption Obligations

#žEWfWŁS_ b‑WS‛ VdW[efUaddgbfTWŽSh[adł S‛ V fZWda^^ai [‛Y SUfe SdWbdaŽZ[T[fWW,

Ž3TgeWaXbai Wdł S‛ V [‛Xd[‛YWgba‛ fZWd[YZfe S‛ V [‛fWdWefe aXfZWUa_ bS‛k S‛ V eZSdWŽa^VWdež

ŽFSł[‛Y SdVhS‛fSYWaXSgfZad[fk XadbWdea‛ S^YS[‛ S‛ V USgeWVW‑S_ SYWfa fZW[‛fWdWefe aX fZWUa_ bS‛kł fZWW‑f[f[Weadeg hTe[d[Sd[Wež

Ž6[hWfe[a‛ł W_TWW‑W_W‛fład_ [eSbbdabd[Sf[a‛ aXUa_ bS‛k bdabWdfkž

ŽA_ Wd[‑YadSUUWbf[U

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

VII. Comply with Anti-monopoly Obligations

Ua` VgUfW.ž

$žFZWbd[`U[b´WaXXS[dUa_bW'f[f[a`ł S`f[Ž_a`aba´k´Si S`V fZWS`f[fdgef´Si e aXhSd[Ž age Uag`fd[WeeZS^^TWaTeWdhVW.ž

%ž? a`aba´k SYdWW_W fei [fZ fZWW WUfaX_a[`[bg´Sf[`Y_Sd]Wfbd[UWeeZS^^TWaha[VWVž

&ž5a_b´ki [fZ Sbb´[UST´WS`f[Ž_a`aba´k´Si eaXfZWdWWVhS`f ]gd[eV[Uf[a`e-_S]W dWcg[dWV_WdYWdUa`fda^ `ʃ`YdWSfWVfa_WdYWdʃSUcg[e[ff[a` adWcg[fkadSeeWffdS`eSUŽf[a`ež

VIII. Comply with Obligations Against Unfair Competition

#ž3ha[VeWW]]`Yf̓SV[`Yabbadfg`[fkadV[ed]gbf]XS[dUa_bWf[f[a` i [fZ afZWdabWdSfade fZdagYZ fZWSVabf[a`aX_WS`eeZSfh[a´SfWYW´dS^´k SUUWbfWV Tge[`WeeWfZ[Ue.ž

$ž5a`eU[age´k_S[`fS[`fZWXS[d WeeaXfZW_Sd]WfadVW]Sha[VUda`iV[`YagfUa_bWŽ [fade XadfZWbgdbaeeWaXeW^^[`Y YaaVeadbdah[V[`YeWdh[UWSf bd[UWeTWai Uaefž

%ž3ha[VeW^^[`Y YaaVeadeVWdh[UWeSYa`ef fZWii[^`[eWeaXfZWbgdUZSeWdaadSffSUZ afZWd g`dWSea`ST´WUa`V[f[a`ež

&žBdab´WeZS^^`afTWdWefd[UfWVXda_bgdUZSe[`Y VWed`SfWWYYdSfWW YaaVeadeWdh[UWž

' žEfd[Uf^ka TeWdhWSbb´[UST´W´[`fWddSf[a`S^S`V Va_Wef[U´Si ea` S`f[Ž`XS[dUa_bWŽ f[f[a`ž

FZWXa^^ai [`Y SUf[h[f[WeSdWefd[Uf^k bdaZ[T[fWV,

Ž5ag`fWdXW[f[`Y-

Ž8S´eWSVhWdf[e[`Y-

Ž5a^^ge[hWbT[VV[`Y-

Ž5a__WdU[S^Td[TWdk-

Ž`Xd[`YW_W`f.fgbpa`fdSVWeWUdWfe-

Ž6a_aSYWfa Tge[`WeedWbgfSf[a`ž

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

#ž;t[e)XadT[VVW`fa W`YSYWadbSdf[U[bSfW[`XdSgVg´W`f`S`U[S^SUf[h[fk-adfa Ua`VgUf

S`k Xad_ aXVWUWbf[a` fa YWf S ´aS` adXadXadW[Y` W)UZS`YWfdS`eSUf[a`e-adfa Ua`VgUf
S`k [^WYS^ebWUg^Sf[hWTgk[`Y adeW^^[`Y aXUdWV[f XSU[^[fk adXadW[Y` UgddW`Uk-adfa VhSVW
 `S`U[S^dWYg^Sf[a`e Tk [_bdabWd_ WS`e-adfa WYSYWadbSdf[U[bSfW[` fZW `S`U[S^ Tge[Ž
`Wee[ `h[a^Sf[a` aX_ Sd]WfSUUWee Ua`V[f[a`e-adfa bdah[VWUgSdS`fWW XadS`k[` V[h[VgS^
adXadS`k W`f[fk agfe[VWfZWUa_ bS`k adS`k [` V[h[VgSŽ

$ž f[e XadT[VVW` fa See[ef fZW ´WYS^[ÑSf[a` aX[^^[U[f bdaUWWWe aXe agebWUfWVUd[_ WžfZW
Xa^^ai [`YTWZSh[adeSdWbdaZ[T[fWW,

Ž>WSeW adbdah[VWUSb[fS^SUUag`f fa afZWde-

Ž3ee[ef fZWfZ[dV bSdfk fa Ua`hWdf bdabWdfk [` fa USeZł `S`US^[`efdg_ W`fe ad_ Sd]WfŽ
ST^WSeeUgd[f[Wež-

Ž3ee[ef fZWfZ[dV bSdfk fa fdS`eXWdXg`Ve-

Ž3ee[ef fZWfZ[dV bSdfk fa Ua`hWdf Xg`Ve[` fa fS`Y[T^WSeeWfe fa V[eYg[eWfZWeagdUWS`V
`SfgdWaXegUZ Xg`Vež

%ž 5a`VgUf Tge[`Wee i [fZ U^[W`feł [`fWd_ WV[Sd[We S`V Tge[`Wee bSdf`Wde i [fZ ^WY[f[_
_ SfWS`V dWbgfST^WXg`Ve eagdUWež

X. Comply with Export Control and Economic Sanction Obligations

#ž G`VWdefS`V S`V Xg^^k Ua_ b^k i [fZ fZWaT^[YSf[a` g`VWdfZWdW^WhS`f Wjbadf
Ua`fda^S`V WUa`a_ [UeS`Uf[a`e [_ b^W_ W`fWV Tk 5Z[` S ł afZWdUag`fd[Wł S`V [` fWd`SŽ
f[a`S^adYS`[ÑSf[a`e egUZ SefZWG@ ł i Z[UZ SdWSbb^[UST^Wfa dWeW^WhS`f Tge[`Wee SUf[h[f[We-
Tge[`Wee SUf[h[f[We eZS^^`af TWUa`VgUfWV [` h[a^Sf[a` aXdW^WhS`f aT^[YSf[a`e Tk U[dUg_ hW`f fZW
Xa`SgVg^W fa dafa fZWd`_ WS`ež

$ž 5a_ b^k i [fZ fZW ´Si e S`V dWYg^Sf[a`e a` [_ badf S`V Wjbadf SV_ [`[efdSf[a` ł Ua_ Ž
b^k i [fZ fZWdWcg[dW_ W`fe aXUgefa_ e egbWdh[e[a` ł S`V Sha[V e_ gYY^[`Y ł V[eYg[eWV e_ gYŽ
Y^[`Y S`V S`k afZWd Xad_ e aXh[a^Sf[a`e fa U[dUg_ hW`f Ugefa_ e egbWdh[e[a`ž

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

#ž BWdXad_ fZWaT^[YSf[a`e g`VWdSUUag`f[`Y ´Si eł WegdWfZSf fZWSUUag`f[`Y _ SŽ

fWd[S^eł Taa]eł S` V X[`S` U[S^dbadfe SdWfdgW SUUgdSfW S`V Ua_b`WfŽ EgT_[f bda_bfł

fdgW Ua_b`WfW S`V SUUgdSfW `S`U[S^SUUag`f[`Y[`Xad_Sf[a` fa fZW[`hWefadeł fSjSf[a`

SgfZad[f[Weł dWWhS`f YahWd`_W`f SYW`U[WełS`V dWWhS`f efS]WʻaVWdeaXfZWUa_bS`k[`

SUUadVS`UWi[fZ ʻSie S`V dWYg^Sf[a`e S`V Sbb^[UST^WSdf[UWeaXSeeaU[Sf[a`Ž

$ž5a_b^ki[fZ eUS^dWYg^Sf[a`e- Z[VVW`dWWdhW ada ŽTaa]SUUag`f SdWefd[Uf^k bda^[T[fWdŽ

%ž5a_b^ki[fZdWWhS`fbdah[e[a`eaXfZWeeUUgd[fk ʻSie S`VeeUgd[fkVʻUZ`YWʻSieaX

5Z[`SS`VafZWddWWhS`f Uag fd[We-Xg^^fZW[`Xad_Sf[a` V[eU^aesgdWaT^[YSf[a`[`S`f[_Wʻ

ʻkłfdgfZXg ʻSUUgdSfWS`V Ua_b`WfW_S``WdŽ

XII. Comply with Data Protection and Information Security Obligations

#ž4WdWeba`e[T^WXadVSfS eeUgd[fkS`V[`Xad_Sf[a`eeUgd[fkVgd[`YfZWSbb^[USf[a` aX

VSfSŽ

$ž6gd[`YfZWUa^^WUf[a`S`V_S`SYW_W`faX[`Xad_Sf[a`S`VVSfS,

ŽEZS^^`afefWS^Ua_bS`k[`Xad_Sf[a`S`VbWdea`S^VSfS-addWWłWeWbdaZ[T[fWd[`Xad̃

_Sf[a`-

ŽEZS^^`afeWfgbadgeW_S^[U[ageba`YdS_e[`fWf[a`S^kładdWWSeWS`VfdS`e_[f`Ž

Xad_Sf[a`fZSf[ebdaZ[T[fWdTk ʻSie adS`VdWYg^Sf[a`Ž

ŽEZS^^`afefW^dWWʻdWWʻ1V[eU^ʻaseWʻfS_bWdi[fZładdS_SYWUa_bS`k[`Xad_Sf[a`S`V

bWdea`S^VSfS[`fZWUa_bS`keebaeeWłe[a`Ž

ŽEZS^^`afVaiʻ`ʻaSVadfdS`eWWd[_badfS`fbWdea`S^[`Xad_Sf[a` adUadbadSfWVSfSfa

bWdea`S^_aTʻWWSfSfdS`e_[ss[a`dWh[UWei[fZagfSgfZad[zSf[a`Ž

ŽEZS^^`afUSddkadfdS`e_[fagfaXfZWUag`fdk[`Xad_Sf[a`fZSf_Sk S WUf`Sf[a`S^

eeUgd[fkłZSd_bgbT^[U[`fWdWefeł_bSUffZWeeUgd[fkaXUa_bS`k[`Xad_Sf[a`łS`VbWdea`S^

[`Xad_Sf[a`i[fZagffZWUa`eW`f aX[[se ai`WdadfZSf_Sk[`d[`YWgba`[`V[h[VgSʻ[`fWdȓ

Wefež

XIII. Comply with Confidentiality Obligations

#žg^^^aTʻ[YSf[a`e fa]WWb Ua_bS`k efdSVWeeUdWdfe S`V bdafWUffZWUa`VWf[aS^^ Ž

Xad_ Sf[a` aXfZWUa_bS`k S`V fZWWf[fkłfZWdWWhS`fUa` VWf[S^[` Xad_ Sf[a` aXU^[WŁfe eZS^^TW][WbfUa` VWf[S^[` SUUadVS`UWi [fZ ´Si ełdWYg´Sf[a`e S`V Ua` fdSUfbdah[e[a` ež

$žEfd[Uf^k Ua_ b^k i [fZ dWWWhS`f SV_ [` [efdSf[a` dWYg´Sf[a`e dWWSdV[` Y fZWbdah[e[a` aX Ua` VWf[S^[` Xad_ Sf[a` fa fZ[dV bSdf[Wž

XIV. Comply with Obligation to Avoid Insider Trading

Efd[Uf^k Ua_ b^k i [fZ fZWbdah[e[a` e aXUd_ [` S^^´Si łeWUgd[f[We ´Si łdWWWhS`f ´Si e S`V dWYg´Sf[a`e aXfZWUag` fdk S`V dWY[a` [` i Z[UZ fZWUa_ bS`k [e ´aUSfWł Se i W^^Se fZW bdah[e[a` e aXfZWdWWWhS`f dg´We S`V dWYg´Sf[a`e aXfZWUa_ bS`k S`V fZWWf[fkł S`V fZW Xa^^ai [` YSUfe SdWbdaZ[T[fWV,

Ž5a_ bS` [We łdV[h[dgS^^e adoebWUf[ UdWSfWe bWdea` egeeW` e[VWd ´ Xad_ Sf[a` fa fdSVW SeeWfead ` S` U^S^eWUgd[f[W ž

Ž6[eU^aeW[e[dVWd[Xad_ Sf[a` fa ` a` ŽTgeⁿ Wee²dWfWd bWłea` ełfa bWłea` e i Zo ZShW ` afe[Y` WV S` a` ŽV[eU^aegdWYdWW_ W fadfa ebWU[` UdWSfW bWłea` ž

XVI. Ensure Compliance by Business Partners

I. Company's Compliance Management Objectives

II. Company's Compliance Management Philosophy

III. Compliance Responsible Party

IV. Compliance Obligations and Duties

VI. Handling of Violations

6[dWUfSgbWdh[ead,   DWeba`e[T^WBSdfk,

6SfW   6SfW

sinochem...
In science we trust