

Sino-Ocean Group Code of Conduct for Suppliers

Sino-Ocean Group believes that sustainable development requires joint efforts and win-win cooperation. Therefore, we have developed Sino-Ocean Group Code of Conduct for Suppliers (hereinafter referred to as the “Supplier Code”), which shall be agreed to, signed and observed by all contracted suppliers. We choose suppliers based on their integrity and reliability. Priority will be given to those who adopt sustainable development policies beneficial to the society and the environment, *ceteris paribus*. We require our suppliers to comply with the following Code of Conduct:

1. Compliance governance

- Suppliers must abide by all applicable laws and regulations when conducting business;
- Suppliers shall formulate anti-bribery and anti-corruption policies, code of conduct and relevant procedures to eliminate any form of bribery, corruption, fraud, abuse of power and waste, and ensure their strict implementation;
- Suppliers shall offer timely feedback on major conflicts of interest to ensure fair cooperation and safeguard the interests of both parties.

2. Environmental protection

- Suppliers shall adopt appropriate systems and management mechanisms to assess, measure and reduce the impact of their business operations on the environment;
- Suppliers shall take actions as appropriate to deliver better performance in energy use, carbon emissions, water use and waste disposal, etc.

3. Labor relations

- Children below the minimum working age shall not be employed;
- During recruitment, the decisive factor to be considered shall be the qualifications of candidates. Any unequal treatment or discrimination based on factors such as gender, race, nationality, age, marital status, children status, sexual orientation, religion and disabilities of employees are strictly forbidden.
- Suppliers shall not employ any form of forced labor, coerced labor or bonded labor;
- Suppliers shall resist any form of workplace bullying, harassment, corporal punishment and abusive behavior;

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- Suppliers shall sign labor contracts with all employees in accordance with local legislation and observe local codes of conduct as applicable;
 - Suppliers shall comply with the law of the People's Republic of China Ministry of Human Resources and Social Security in the minimum wage regulations; as well as pay wages to their employees on time, and shall not allow any delay of over one month;
 - Suppliers shall provide employees with holidays that meet the legal requirements based on specific local conditions;
 - Suppliers shall ensure their employees' rights and interests of freedom of association and negotiations, set up communication mechanisms and complaint procedures for employees to voice their demands and complaints to the managerial staff.
4. Health and safety
- Suppliers shall introduce health and safety policies and specify the implementation accordingly, so as to reduce the chance of injury or illness of employees and protect their health;
 - Suppliers shall ensure the staff at construction site having suitable work and living conditions;
 - Suppliers shall provide employees with training in site safety and relevant codes of practice, so that every employee can ensure the safety of themselves and their colleagues.
5. Suppliers and subcontractors
- Suppliers shall formulate the code of conduct that meets the requirements;
 - Suppliers shall pay remuneration to their own suppliers and subcontractors on time;
 - We encourage primary suppliers and contractors to pass on the principles and requirements of this policy, when conditions allow, to secondary suppliers, subcontractors and more partners, contributing to a sustainable supply chain.
6. Audit and supervision
- Suppliers shall provide relevant documents to Sino-Ocean Group and its authorized parties as proof of their compliance with this Code of Conduct, and allow Sino-Ocean Group and its authorized parties to audit their related products and services.

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7. We will give first consideration to cooperating with suppliers, who:
- Abide by all applicable laws and regulations related to environment, society and governance;
 - Strictly observe and promote Sino-Ocean Group's Code of Conduct for Suppliers;
 - Have developed their own sustainable development policies, supplier code of conduct or sustainable procurement policies;
 - Have obtained environmental, social and governance management system certification (for example, ISO 14001 for environmental management systems, OHSAS 18001 for occupational health and safety management systems and other equivalent management systems), or be able to provide environmentally friendly products and services.

This policy is updated every three years. It can be reviewed and updated as appropriate when necessary.